

<b>Project</b>	Land South of Larches, Ashgrove Road, Sevenoaks, Kent	<b>Date</b>	November 2022
<b>Note</b>	Response to Public Consultation	<b>Ref</b>	UE0441
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<b>Status</b>	FINAL		

## 1 Introduction

- 1.1 This Technical Note presents a response to the public consultation in relation to a proposed residential development at Land South of Larches, Ashgrove Road, Sevenoaks, Kent (Sevenoaks District Council planning reference 22/02645/OUT).

## 2 Context

- 2.1 Following the submission of the planning application for the proposed development, public consultation responses in relation to biodiversity were collated by the applicant's planning consultant and this Technical Note provides further information in relation to concerns which were raised.

## 3 Ecological Features

### **Ancient Woodland**

- 3.1 The presence of nearby Ancient Woodland was identified through the desk study element of the Preliminary Ecological Appraisal<sup>1</sup>. Given the distance and intervening landscape, direct impacts during the construction phase of the development are considered unlikely. However, R11 within the PEA recommends that works are carried out in compliance with a Construction Environmental Management Plan (CEMP: Biodiversity) to protect against potentially damaging construction activities. It is anticipated that measures including protective fences, exclusion barriers, pollution control, methodological or seasonal restrictions, location and timing of sensitive works will avoid or reduce impacts on the surrounding landscape, including Ancient Woodland. The impact of increased recreation within the woodland is considered negligible given that the existing Public Right of Way network throughout the

<sup>1</sup> Urban Edge Environmental Consulting Ltd (UEEC; 2022): *Ashgrove Road, Sevenoaks, Kent: Preliminary Ecological Appraisal*.

surrounding landscape (including the Ancient Woodland) is already well used by dog walkers and other visitors.

### **Hedgerows**

- 3.2 The PEA acknowledges the presence of the western boundary hedgerow (H3) as a Habitat of Principal Importance, in addition to its value as a supporting habitat for a range of wildlife<sup>2</sup>. The removal of a small section of H3 will be mitigated by the reinstatement of the hedgerow to allow for visibility splays. Additionally, native species-rich hedgerow planting along the southern boundary will connect hedgerows H1 and H2 and enhanced connectivity across the site, mitigating the severance along H3.

### **Biodiversity Net Gain**

- 3.3 The Biodiversity Net Gain (BNG) report illustrates the effect on biodiversity using the latest DEFRA Biodiversity Metric 3.1 Calculation Tool<sup>3</sup>. Whilst it is acknowledged that the scheme cannot be sufficiently mitigated on site, an agreement with Kent Wildlife Trust Consultancy Services has been reached, with a suitable receptor site for off-site biodiversity unit creation identified. This approach complies with the Environment Act 2021 prescriptions for achieving 10% net gain as part of the development, albeit this is not yet a mandatory requirement.

### **Protected Species**

- 3.3.1 The PEA recommended that further protected species surveys for great crested newt, badger, roosting bats, foraging and commuting bats, hazel dormouse and reptiles were undertaken to identify and evaluate the potential impacts of development on protected species, and make recommendations accordingly.

#### ***Great crested newt***

- 3.4 Overall, habitats within the survey area provide a range of features which could support a population of great crested newt during the terrestrial phase of their lifecycle. The existing pond did not hold water during the breeding period for this species and appears to be drying out naturally. Due to the lack of survey data obtained for off-site ponds within 250m of the site boundary during the 2022 season (for which access was requested and denied), the Protected Species Surveys report for the application site recommended that the proposed development joins the District Level Licensing scheme for Kent<sup>4</sup>.

#### ***Badger***

- 3.5 The survey results show that badger was using sett S2 during the spring / summer survey season in 2022. This was confirmed by field evidence observed at the sett entrances and as well as camera monitoring. S3 was also considered to be actively used during the 2022 survey period, but this was based upon field

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<sup>2</sup> Urban Edge Environmental Consulting Ltd (UEEC; 2022): *Ashgrove Road, Sevenoaks, Kent: Preliminary Ecological Appraisal*.

<sup>3</sup> Urban Edge Environmental Consulting Ltd (UEEC; 2022): *Ashgrove Road, Sevenoaks, Kent: Biodiversity Net Gain Assessment*.

<sup>4</sup> Urban Edge Environmental Consulting Ltd (UEEC; 2022): *Ashgrove Road, Sevenoaks, Kent: Protected Species Surveys*.

sign surveys only. Sett S1 was identified as an active fox den. The Protected Species Surveys report for the application site recommends the establishment of sett protection zones around badger setts S2 and S3 to avoid destruction / damage / obstruction of the sett or disturbance to badgers during the construction phase of the development<sup>5</sup>.

### **Bats**

- 3.6 Works to fell low suitability trees (T6 & T7) within the woodland will be undertaken in accordance with a Non-licenced Method Statement to reduce the risk of killing / injury to roosting bats<sup>6</sup>. This approach is in line with Bat Conservation Trust guidelines<sup>7</sup>.
- 3.7 Due to the high proportion of common and widespread bat species and relatively very low levels of activity recorded during the bat activity surveys (April-June 2022), the application site was considered to be of Site Importance for its bat population<sup>8</sup>. Surveys carried out July-October 2022 are in the process of being analysed, but the low levels of activity recorded during walked transect surveys in the first part of the season appeared to consistent with walked transects during the second part of the season. The majority of features where elevated bat activity was recorded (hedgerows and woodland) will be retained and protected.

### **Hazel dormouse & Reptiles**

- 3.8 A full suite of reptile presence / absence surveys was completed 2022, which provided a good level of certainty that reptiles were absent from the application site<sup>9</sup>. Hazel dormouse presence / absence surveys up to July 2022 recorded no evidence of this species within the application site. A full suite of surveys has now been completed for the 2022 season, which provided a good level of certainty that hazel dormouse is absent from the application site.
- 3.9 Neither hazel dormouse or reptiles are not considered to present a constraint to the development proposals.

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<sup>5</sup> Urban Edge Environmental Consulting Ltd (UEEC; 2022): *Ashgrove Road, Sevenoaks, Kent: Protected Species Surveys*.

<sup>6</sup> *Ibid*

<sup>7</sup> Collins, J. (ed.) (2016): *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 3rd Edition, Bat Conservation Trust, London.

<sup>8</sup> *Ibid*

<sup>9</sup> *Ibid*