Phase 1 Habitat Survey

Extended Assessment

Adventure Zone, Mote Park
Maidstone, Kent

10 November 2015

Lewis Ecology

Lewis Ecology • email: info@lewisecology.co.uk • web: www.lewisecology.co.uk • Tel. 07801 750904

Report For

Commercial and Economic Development
Maidstone Borough Council
Maidstone House
King Street
Maidstone
Kent
ME15 6JQ

Main Contributors

Brett Lewis

Issued by

Dr Brett Lewis BSc (Hons) MSc PhD MCIEEM

Lewis Ecology

27 Saltwood Road
Maidstone
Kent
ME15 6UY
England
Tel: +44 (0) 7801 750904

Maidstone Borough Council

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Document Revisions

No.	Details	Date
1	Phase 1 Habitat Survey - Extended Assessment	10 Nov 2015

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1.0 Introduction

1.1 Purpose of this report

Maidstone Borough Council is considering various options to secure a sustainable future for Mote Park. One option for consideration is the construction of a new Adventure Zone facility consisting of high rope walks and climbing walls, to be situated close to the existing park facilities at Ordnance Survey grid reference TQ 52746 55783.

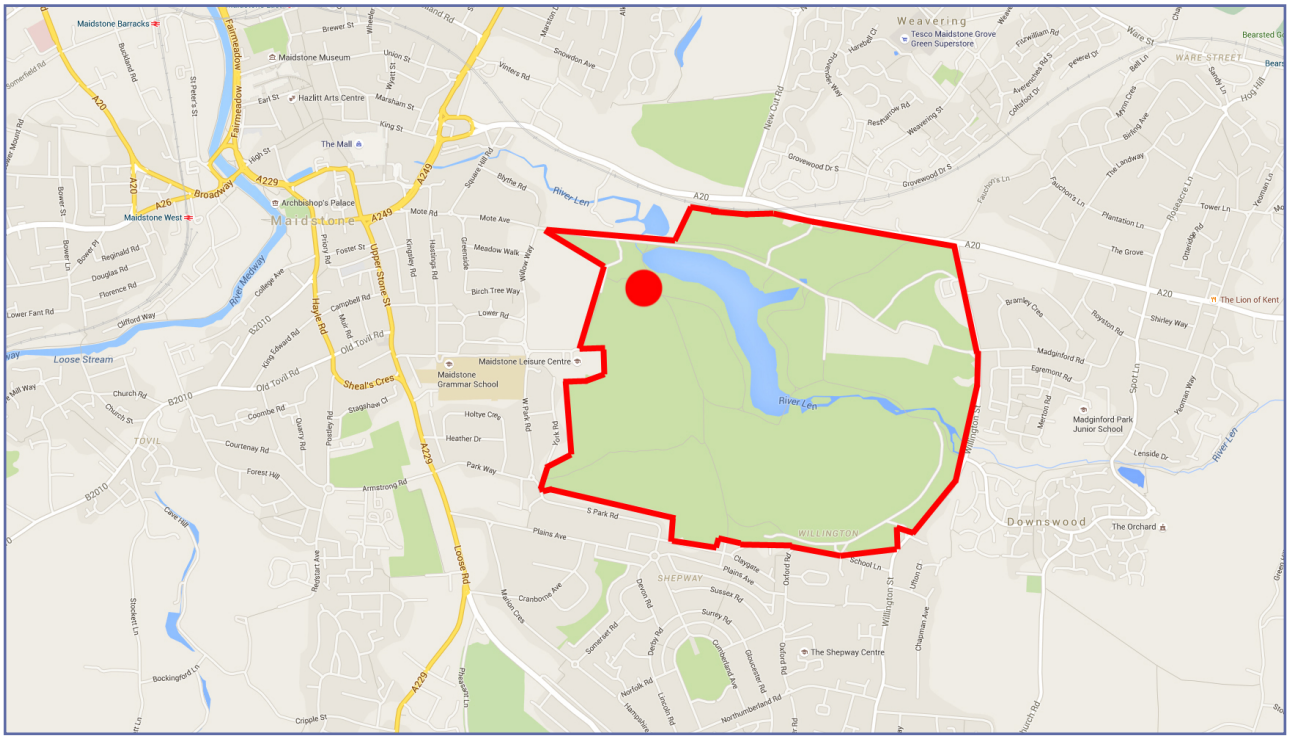
Maidstone Borough Council have commissioned Lewis Ecology to undertake a baseline ecological assessment in support of the proposed works. Two sites within Mote Park have been identified as potential locations for the Adventure Zone and a further site has been identified for potential biodiversity enhancement as part of the councils commitment to offset developmental impacts to biodiversity interests of the site. In completing the assessment a survey of the site was undertaken in which any potential ecological constraints that might be associated with the development of the site were identified.

This report details the methods adopted and the results of the survey work.

1.2 Site context

The site is located approximately 1 km south-east of Maidstone Town Centre, The County Town of Kent. The site is contained within Mote Park, which comprises a large expanse of open parkland covering over 182 hectares of grassland, woodland, rivers and a 30 acre lakeland.

Fig. 1.0. Mote Park and Site location.



2.0 Methodology for Data Collection

2.1 Desk Study

A data-gathering exercise was undertaken to obtain information relating to statutory and non-statutory nature conservation sites, priority habitats and species, and legally protected and controlled species (see boxes 1 and 2 below).

Box 1 - Designated wildlife sites and priority habitats and species.

Statutory nature conservation sites

Internationally important sites: Special Areas of Conservation (SACs) and candidate SACs, Special Protection Areas (SPAs) and proposed SPAs, Sites of Community Importance, Ramsar sites and European offshore marine sites.

Nationally important sites: Sites of Special Scientific Interest (SSSIs) that are not subject to international designations and National Nature Reserves (NNRs)

Local Nature Reserves (LNRs) are statutory sites that are of importance for recreation and education as well as nature conservation. Their level of importance is defined by their other statutory or any non-statutory designation (e.g. if an LNR is also an SSSI but is not an internationally important site, it will be of national importance). If an LNR has no other statutory or non-statutory designation it should be treated as being of district-level importance for biodiversity (although it may be of greater socio-economic value).

Non-statutory nature conservation sites

Local Wildlife Sites are special places for wildlife and are vital to the future survival of native species. There are over 440 Local Wildlife Sites in Kent. They cover and area of over 27, 000 hectares (roughly 7% of the county). They range from a 0.13 hectare churchyard important for orchids, to grazing marsh sites of over 1,000 hectares. They do not have legal protection like Sites of Special Scientific Interest or Nature Reserves but they complement these protected sites and provide vital linkages between habitats. Their long-term survival depends upon the interest and goodwill of their land managers and owners.

Priority habitats and species

A Biodiversity Action Plan (BAP) for Kent lists priority habitats as ‘key habitats’, of which there is a significant proportion of the UK resources in the county. Also, key habitats that have declined in the recent past or are still declining locally, as well as key habitats that are locally rare and/or threatened.

Similarly, priority species are those that Kent can contribute to the achievement of the national targets, because the species are characteristic of the area. Furthermore, species that are locally rare, declining, threatened and are either high profile and/or locally distinctive.

Box 2 - Legally protected and controlled species

A list of these species can be seen on the following pages:

- Protected species*
- National or Kent Biodiversity Action Plan (BAP) priority species
- Kent invasive species initiative

*Protected species are those listed on the EC Habitats Directive - Annexes II and IV, Conservation (Natural Habitats) Regulations 1994 - Schedules 2 & 4, Wildlife and Countryside Act 1981 (as amended) excluding species that are protected only in relation to sale.

Data reported herein will be limited to within 1 km of the site boundaries. Source of information regarding sites, habitats and species within the desk study were obtained via the Kent and Medway Biological Records Centre (KMBRC), the Kent Wildlife Trust (KWT) and the Multi Agency Geographic Information for the Countryside (MAGIC) online resource system. It should be noted that Lewis Ecology is not responsible for the validity of records, and therefore does not warrant any data gained through the desk study from external sources which have been used to inform this assessment.

2.2 Field Surveys

2.2.1 Habitats

A phase 1 habitat survey of the site and its surrounds was undertaken by Lewis Ecology on 20th March 2015. During the survey, distinct habitats were identified and any features of interest were photographed and described in more details in a target note. As the standard phase 1 habitat survey methodology is mainly concerned with vegetation communities, the survey was extended to allow for the provision of information on other ecological features, including identification of the presence/potential presence of legally protected and otherwise notable species.

2.2.2 Species

The methodologies used to establish the presence/potential presence of protected and notable species as part of the extended phase 1 habitat survey are summarised below. These relate to those species/biological taxa that the desk study and habitat types present indicated could occur on the site.

Birds

The habitats on-site were assessed for the potential to provide nesting habitat for breeding birds, or to support important assemblages of rare or notable bird species, particularly those listed as Biodiversity Action Plan (BAP) species for Kent and Species of Principal Importance (SPI).

Bats

The habitats on-site were assessed for the potential to provide habitat for roosting or hibernating bats, or to support foraging and commuting bats.

Mammals

The habitats on site were assessed for their potential to support protected mammals. Surveys included looking for field signs such as feeding remains, nests, burrows, setts as well as faecal remains, dropping and spraints.

Herpetofauna

Habitats that may support sheltering or breeding sites for herpetofauna were examined for the potential presence of animals including widespread species such as slow-worms, grass snakes, frogs, toads and newts.

Other species

In addition, an assessment was made of the potential for the site to support any other species considered to be of value for biodiversity conservation and that were identified as occurring within the vicinity of the study area by the desk study, particularly those listed as Biodiversity Action Plan (BAP) species for Kent and Species of Principal Importance (SPI).

3.0 Site Baseline

3.1 Statutory nature conservation sites

A desk based search showed that there are three Local Nature Reserves within 1 km of the study site and include the River Len, Len Valley and Vinters Valley Park Local Natures Reserves. Also Spot Lane Quarry SSSI is approximately 2.3 km from the study site (See table 3.1 below).

Table 3.1 - Statutory nature conservation sites

Site Name	Status	Grid Reference	Area (ha)	Distance from site (m)
River Len	LNR	TQ 766 556	0.96	750
Len Valley	LNR	TQ 765 556	2.54	410
Vinters Valley Park	LNR	TQ 776 561	30.19	710
Spot Lane Quarry	SSSI	TQ 793 541	0.09	2300

Natural England is responsible for notifying SSSIs, ensuring they are managed appropriately and assessing and monitoring their biodiversity. Natural England provide site descriptions via their

website at www.gov.uk/protected-or-designated-areas. A synopsis of each site description and its notification is provide below:

River Len & Len Valley (LNR)

A Habitat Management Plan for the River Len & Len Valley LNR has been produced by the Medway Valley Countryside Partnership (2012), which provides the following site description:

A 2.54 hectare inner-urban site owned by Maidstone Borough Council and managed for the benefit of nature conservation, the quality of life of local residents, townscape, flood water storage, air quality. The reserve forms a part of the *Mote Park and River Len Local Wildlife Site* (MA62) and is designated as a Local Nature Reserve. The River Len is classified as a Critical Ordinary Watercourse by the Environment Agency. It is bounded to the North by Riverbank Close and the Sunningdale Court tower block, to the west by the Sainsbury's car park, to the east by Turkey Mill, to the south by back gardens of properties in Chancery Lane, Mote Road, Square Hill Road, Blythe Road, allotment gardens and Mote Park. In addition to the sites own intrinsic landscape and amenity value it also provides a significant wildlife habitat on a County-wide scale and green corridor link between the town centre and the historic Turkey Mill, Mote Park and open countryside to the east.

River Len LNR comprises open water habitats, woodland, species rich damp grassland with spring-line seepages, scrub and diverse wetland habitats including the sedge and reed-mace lined river channel and crack willow / alder carr. Survey work on the site has identified a rich saproxylic (species with life-cycles reliant upon dead wood) invertebrate fauna that is particularly associated with wet woodland.

A further source of considerable invertebrate interest is the reed-bed and damp grassland that persists at the Southwest extent of the site – but that is particularly threatened by aggressive garden escapes such as Himalayan giant blackberry and sycamore. Invertebrate species recorded here that are particularly associated with this habitat include Desmoulin's whorl snail *Vertigo moulinsiana* and water vole *Arvicola amphibius [terrestris],* both legally protected UK and Kent Biodiversity Action Plan Priority Species, the crane fly *Tipula maxima*, white-legged damselfly *Platycnemis pennipes*, large red damselfly Pyrrhosoma nymphula, banded demoiselle *Calopteryx splendens* short-winged conehead cricket *Conocephalus dorsalis* and the soldier beetle *Silis ruficollis*. Landlocked urban colonies of grassland butterflies including gatekeeper, orange tip, small copper, meadow brown, common blue, Essex and large skipper also persist at this site.

Vinters Valley Park (LNR)

Vinters Valley Park LNR is owned by Kent County Council and Maidstone Borough Council and managed by Vinters Valley Trust. The site has a variety of habitats including woodland, grassland, scrub, lakeland, a stream and marshland. Owing to its historical setting as a parkland the reserve is home to a range of both native and non-native flora and some very mature trees. There are a plethora of woodland birds that frequent the feeding stations set up on the reserve and throughout the site. The site is also home to a number of wildfowl species and kingfishers are regularly sited throughout the wetland habitats.

Spot Lane Quarry (SSSI)

Spot Lane Quarry is a designated SSSI because it provides the best cross-section, through a series of cambers and gulls, of Hythe beds currently visible in Britain. Furthermore, the loess in the gulls is noted for its fauna of land snails, possibly of Wolstonian age. Loess in Britain is typically unfossiliferous, and Spot Lane Quarry is one of very few sites available where loess fauna can be studied. Spot Lane Quarry is therefore a key Pleistocene site for periglacial, mass movement and palaeoenvironmental studies.

The proposed development site at Mote Park is within the 'Impact Risk Zone' of Spot Lane Quarry Site SSSI. The quarry site is approximately 2.3 km southeast of the planned development area. However, the proposed 'Adventure Zone' play area is unlikely to cause impacts to the Spot Lane Quarry SSSI since the proposed development does not correspond with any of the noted 'likely risks' as listed on the government information pages for that site.

3.2 Non-statutory nature conservation sites

A desk based search showed that there is just one Local Wildlife Site (LWS) within 1 km of the study site - Mote Park and River Len LWS. (See table 3.2 below).

Table 3.2 - Non-statutory nature conservation sites

Site Name	Status	Grid Reference	Area (ha)	Distance from site (m)
Mote Park & River Len	LWS	TQ 775 549	152.69	Included within the site

Local Wildlife Sites are identified, selected, managed, monitored and protected through a partnership-run Local Wildlife Site system. These are most commonly administered on a county or unitary authority scale and their efficient delivery requires access to a large volume of up-to date information and data. A synopsis of the site description and its notification is provide below:

Mote Park and River Len (LWS)

The site is recorded as being a parkland estate since the 13th century. It was a deer park for much of this time, until the Second World War. It has ancient trees displaying many features such as rot holes and dead wood which have potential to be used by a variety of wildlife such as birds, bats, invertebrates and lower plants. It also includes areas characteristic of old wood pasture, such as on the south side where a scattered mature oak community exists. The stretch of the River Len to the west of Mote Park is included as it supports Desmoulin's whorl snail, a UK BAP priority species.

Within Mote Park, the only areas which are not considered of sufficient value for inclusion in the Local Wildlife Site designation are the sports fields and children's activity areas on the west side of the park, and the development areas of Mote House and the Walled Garden. The Local Wildlife Site includes the rest of the Park excluding some houses and gardens on or near the park border. The mini-golf course is included as it retains the parkland character, holding a number of important, mature and veteran trees. The fact the grassland is improved here does not detract

from this interest. The River Len is also included in the site until it is culverted under Sainsbury's landholdings to the west.

3.3 Habitats

Appendix B presents a map of the proposed site locations together with an area proposed for biodiversity enhancement. Photographs of the sites are also provided in Appendix C. The following sections describe the habitats on and around the site together with records of protected and notable species found with 1 km (5 km for bats) of the site, within the past 10 years.

3.3.1 Site context and surrounding habitats

The sites of interests (potential development sites) are located at the western area of Mote Park and are currently in use as:

1) Sports fields [football pitches];
2) Pitch and putt golf course; and
3) Over-flow car park.

Each of the sites and their associated habitats are described in section 3.3.2 below.

3.3.2 On-site habitats

Site 1 - Sports field

The sports field area is currently managed as a recreational facility consisting of approximately 1.64 hectares of amenity (improved) grassland habitat. The whole area has been subject to resurfacing in recent years and the intrinsic biodiversity value of this site is considered to be low at the time of the survey.

Site 2 - Pitch and putt golf course

The pitch and putt golf course is currently managed as a recreational facility consisting of approximately 1.67 hectares of amenity (improved) grassland together with some mature and veteran trees. Tree species include English oak (Quercus robur), sweet chestnut (Castanea sativa), field maple (Acer campestre) and cherry (Prunus sp.)

The pitch and putt course is contained within the Mote Park and River Len LWS and is immediately adjacent to an area of scrub-woodland habitat leading to a wetland area and lakeland. Species recorded within the scrub habitat include Bramble (Rubus fruiticosus agg.), common nettle (Urtica dioica), greater burdock (Arctium lappa), broad-leafed dock (Rumex obtusifolius), red sorrel (Rumex acetosella), common dandelion (Taraxacum officinale), rosebay willowherb (Chamerion angustifolium), buddleja (Buddleja davidii), dog rose (Rosa canina), ribwort plantain (Plantago lanceolata), cleavers (Galium aparine), common ivy (Hedera helix), common reed (Phragmites australis), as well as tree species including - elder (Sambucus nigra), hawthorn (Crataegus monogyna), ash (Fraxinus excelsior), goat willow (Salix caprea), field maple (Acer campestre), sycamore (Acer pseudoplatanus), and English walnut (Juglans regia).

Site 3 - Overflow car park

The over-flow car park is contained within the Mote Park and River Len LWS and is currently managed as an additional parking facility at times of high demand. The site consists of approximately 1.56 hectares of amenity (improved) grassland, bare earth tracks, together with some mature and veteran trees. The site is lined on both the north and southern margins by European beech (Fagus sylvatica) trees and is interspersed with notable and champion trees such as Siberian elm (Ulmus pumila) and a tulip tree (Liriodendron tulipifera). There are a number of mature English oak (Quercus robur) trees at the eastern end of the site. This area is being considered for biodiversity enhancement in line with the National Planning Policy Framework (2012).

3.4 Species

3.4.1 Birds

Table 3.2 below provides a list of records of protected or notable birds within 1 km of the site. All records were provided by KMBRC (2015) and are limited to historical records from the past 10 years only.

Table 3.2 - Records of protected or notable birds within 1 km of the site

Common name	Latin name	No. of records	Date of most recent record mm/yyyy	OS Grid Reference
Honey buzzard	*Pernis apivorus*	1	08/2009	TQ 77 54
Marsh harrier	*Circus aeruginosus*	2	09/2010	TQ 77 54
Merlin	*Falco columbarius*	1	02/2013	TQ 78 55
Hobby	*Falco subbuteo*	6	09/2010	TQ 77 54
Dunlin	*Calidris alpina*	1	04/2012	TQ 78 55
Herring gull	*Lares argentatus*	31	02/2011	TQ 77 54
Turtle dove	*Streptopelia turtur*	9	05/2010	TQ 75 S
Cuckoo	*Cuculus canorus*	39	04/2008	TQ 75 S
Kingfisher	*Alcedo atthis*	123	08/2011	TQ 77 54
Lesser spotted woodpecker	*Dendrocopus minor*	63	01/2011	TQ 75 S
Skylark	*Alauda arvensis*	9	12/2007	TQ 75 S
Black redstart	*Phoenicurus ochruros*	2	11/2010	TQ 78 55
Fieldfare	*Turdus pilaris*	18	02/2012	TQ 77 54

Table 3.2 - Continued records of protected or notable birds within 1 km of the site				
Common name	Latin name	No. of records	Date of most recent record mm/yyyy	OS Grid Reference
Song thrush	*Turdus philomelos*	128	11/2012	TQ 75 S
Redwing	*Turdus iliacus*	66	02/2012	TQ 77 54
Wood warbler	*Phylloscopus sibilatrix*	1	04/2010	TQ 77 54
Firecrest	*Regulus ignicapillus*	6	02/2011	TQ 77 54
Spotted flycatcher	*Muscicapa striata*	26	05/2011	TQ 75 S
Starling	*Sturnus vulgaris*	14	04/2012	TQ 75 S
Brambling	*Fringilla montifringilla*	3	12/2010	TQ 77 54
Linnet	*Carduelis cannabina*	17	02/2011	TQ 75 S
Lesser redpoll	*Carduelis cabaret*	14	02/2009	TQ 75 S
Common crossbill	*Loxia curvirostra*	8	07/2009	TQ 77 54
Marsh tit	*Loxia curvirostra*	2	11/2007	TQ 75 S

No protected or notable birds were recorded during a walkover survey however the trees, hedgerows and scrub habitats present on site provide potential nesting opportunities for a variety of species, including many of those listed above.

3.4.2 Bats

Table 3.3 below provides a list of records of bats within 5 km of the site. All records provided by the Kent Bat Group via KMBRC (2015) and are limited to historical records from the past 10 years only.

Table 3.3 - Records of bats within 5 km of the site

Common name	Latin name	No. of Non-roost records	No. of roost records	Date of nearest record mm/yyyy	OS Grid Reference
Brown long-eared	*Plecotus auritus*	18	77	09/2005	TQ 764 556
Soprano pipistrelle	*Pipistrellus pygmaeus*	75	5	05/2014	TQ 773 552
Common pipistrelle	*Pipistrellus Pipistrellus*	129	11	05/2014	TQ 773 552
Serotine bat	*Eptesicus serotinus*	12	2	09/2010	TQ 775 555
Daubenton's bat	*Myotis daubentonii*	66	33	08/2013	TQ 773 552
Natterer's bat	*Myotis nattereri*	5	55	10/2014	TQ 777 550
Noctule bat	*Nyctalus noctula*	47	1	09/2009	TQ 774 553
Nathusius' pipistrelle	*Pipistrellus nathusii*	4	0	05/2014	TQ 773 552
Leisler's bat	*Nyctalus leisleri*	9	2	09/2014	TQ 777 550

A total of 10 species of bats, of the 15 species recored in Kent, have been recorded in the survey area. All 10 species have been recorded on numerous occasions.

All bats are protected under the Wildlife and Countryside Act (1981) (as amended); and by the Conservation of Habitats and Species Regulations (2010).

3.4.3 Mammals

Table 3.4 below provides a list of records of protected or notable mammals within 1 km of the site. All records were provided by KMBRC (2015) and are limited to historical records from the past 10 years only.

Table 3.4 - Records of protected or notable mammal species within 1 km of the site

Common name	Latin name	No. of records	Date of most recent record mm/yyyy	OS Grid Reference
Eurasian badger	*Meles meles*	2	04/2012	TQ 782 548
European hedgehog	*Erinaceus europaeus*	20	04/2012	TQ 782 548
Water vole	*Arvicola amphibius*	8	2010	TQ 765 556

3.4.4 Herpetofauna

Table 3.5 below provides a list of records of herpetofauna species within 1 km of the site. All records were provided by the Kent Reptile and Amphibian Group (KRAG) via KMBRC (2015) and are limited to historical records from the past 10 years only.

Table 3.5 - Records of protected or notable herpetofauna species within 1 km of the site

Common name	Latin name	No. of records	Date of most recent record mm/yyyy	OS Grid Reference
Common toad	*Bufo bufo*	40	10/2013	TQ 774 558
Viviparous lizard	*Zootoca vivipara*	51	09/2014	TQ 775 559
Slow worm	*Angus fragilis*	493	09/2014	TQ 775 560
Grass snake	*Natrix natrix*	62	09/2014	TQ 775 560
Adder	*Vipera berus*	1	04/2005	TQ 776 544

3.4.5 Other species

Table 3.6 below provides a list of records of other protected or notable species found within 1 km of the site. All records provided by KMBRC (2015) and are limited to historical records from the past 10 years only.

Table 3.6 - Records of protected or notable species within 1 km of the site

Common name	Latin name	No. of records	Date of most recent record mm/yyyy	OS Grid Reference
Flowering Plants				
Snowdrop	*Galanthus nivalis*	6	03/2009	TQ 779 550
Bluebell	*Hyacinthoides non-scripta*	7	2010	TQ 769 556
Invertebrates				
Roman snail	*Helix (Helix) pomatia*	1	12/2012	TQ 769 554
Desmoulin's whorl snail	*Vertigo (Vertigo) moulinsiana*	3	2010	TQ 765 556

The diversity of trees and shrubs on site as well as some flowering plants offer good potential for invertebrate species to be found. In particular deadwood and leaf littler provides opportunities for sheltering and foraging for stag beetles (*Lucanus cervus)* and their larvae. Stag beetles are a Species of Principal Importance (SPI) and require action under the UK BAP and are considered conservation priorities under the UK Post-2010 Biodiversity Framework.

3.4.6 Invasive non-native species

Table 3.7 below provides a list of records of invasive non-native species found within 1 km of the site. All records provided by KMBRC (2015) and are limited to historical records from the past 10 years only.

Table 3.7 - Records of invasive non-native species found within 1 km of the site

Common name	Latin name	No. of records	Date of most recent record mm/yyyy	OS Grid Reference
Plants				
Japanese knotweed	*Fallopia japonica*	6	2010	TQ 765 556
Himalayan balsam	*Impatiens glandulifera*	3	2010	TQ 769 556
Japanese rose	*Rosa rugosa*	4	2010	TQ 769 556
Three-cornered garlic	*Allium triquetrum*	4	2010	TQ 765 556
Virginia creeper	*Parthenocissus quinquefolia*	3	2010	TQ 765 556
Giant hogweed	*Heracleum mantegazzianum*	5	2010	TQ 765 556
Invertebrates				
Harlequin ladybird	*Harmonia axyridis*	4	2010	TQ 78 55
Horse-chestnut leaf-minor	*Cameraria ohridella*	7	06/2011	TQ 78 54

These species are all listed on Schedule 9 of the Wildlife and Countryside Act in England and Wales, therefore it is also an offence to plant or otherwise cause to grow these species in the wild.

4.0 Evaluation

4.1 Evaluation Methodology

The biodiversity conservation value of the habitats and species present/potentially present at the Mote Park - 'Adventure Zone' sites have been assessed. The evaluation uses professional judgement in drawing together information about the quality and extent of habitats, characteristics of species' population and distribution, and the findings of both the desk and field studies. Evaluations have been undertaken only for sites/habitats/species that fall within at least one of the categories set out in Boxes 1 and 2. This reflects the expectation that all species/habitats that are of sufficient value that an effect upon them could be significant, would fall within at least one of the categories. The use of these categories therefore enables often lengthy lists of sites/habitats/species to be filtered to derive a short-list of sites/habitats/species that can be the focus of more detailed evaluation work. Regardless of the findings of the assessment, there is a need to recognise that certain habitats and species are legally protected and measures must be taken to ensure that contravention of the relevant legislation is avoided.

4.2 Evaluation

4.2.1 Sites designated for nature conservation

These sites are considered to be important at the level at which they are designated. Within 1 km of the 'Adventure Zone' sites there are three statutory nature conservation sites and they are the River Len and Len Valley LNR, Vinters Valley LNR and Spot Lane Quarry LNR. The sites provide a mosaic of wildlife areas, woodlands, and wetlands together with public access and amenity areas for recreational use. The sites are of considerable local value and are of importance for both natural history and geology.

The Mote Park and River Len LWS is noted for its veteran and ancient trees witch have many features, such as rot holes and dead wood, which have potential to be used by a variety of wildlife such as birds, bats, invertebrates and lower plants. It also includes areas characteristic of old wood pasture, such as on the south side where a scattered mature oak community exists. The stretch of the River Len to the west of Mote Park is included as it supports Desmoulin's whorl snail, a UK BAP priority species.

Whilst there are no clear plans for the 'Adventure Zone', to date, there are two possible areas proposed for its development. Site 1 is currently amenity (improved) grassland, is currently being used as a sports field (football pitches) and is considered to have a low intrinsic biodiversity value. Site 2 is an amenity (improved) grassland area with scrub-woodland habitat, and is currently being used as a pitch-and-putt golf course. Site 2 is included within the existing Local Wildlife Site designation as it retains the historical parkland character, holding a number of important, mature and veteran trees. The fact the grassland is improved here does not detract from its wildlife interests.

Given the clear differences in the biodiversity interests of each of the proposed site locations it is considered that the Adventure Zone will have a much greater impact to biodiversity if built on the LWS, within Site 2.

4.2.2 Birds

Whilst no protected or notable birds were recorded during the walkover survey a number of notable breeding bird species have been recorded within 1 km of the site and may also occur on-site, see section 3.4 above. Site 2, an area within the Mote Park and River Len LWS, provides a diverse and rich habitat of a number of bird species, many of which are recorded in table 3.2 above. The mature and veteran trees together with the scrub habitat areas provide both food and sheltering opportunities for nesting birds.

Given the low biodiversity interests of Site 1 (football pitches), and the wide availability of similar and better habitats in the local area, it is considered unlikely that this location will support important populations of notable bird species. However, that does not negate a requirement to comply with the Wildlife and Countryside Act (1981 amended) with regards to nesting birds. Should nesting birds be found within the proposed development site then the area around the nest should not be disturbed until the young have fledged.

4.2.3 Bats

In the past two years the Kent Bat Group have carried out surveys as part of a national programme to monitor Nathusius' pipistrelle bats. Survey efforts have concentrated on the linear habitats along waterways and at Mote Park this has been carried out within the LWS and Site 2, the pitch and put golf course. Surveys have included the use of harp traps and a number of bat species have been recorded including soprano, common and Nathusius' pipistrelle bats, Daubenton's bats and Natterer's bats. The scrub-woodland habitat provides a corridor in which bats commute and forage. The mature and veteran trees also provide features such as rot holes, woodpeckers holes, lifted bark and hazard beams, that may support roosting bats. Furthermore, serotine bats and noctule bats have been recorded foraging above the tree lines and above the open grassland areas.

Within the past 10 years a number of bat species have been recorded within 5 km of the site - see section 3.4.2 above. A total of 10 species of bats, of the 15 species recored in Kent, have been recorded in the Mote Park area. All 10 species have been recorded on numerous occasions.

If the proposed Adventure Zone is located within Site 2 (the LWS and the pitch and putt golfing area), it is highly likely that it will have an adverse effect on the bat population within the park. The structure and lighting will completely change the layout of an important commuting and foraging area for bats within the park and is likely to overspill onto the important wetland and lakeland habitats nearby.

If the proposed Adventure Zone is located within Site 1 (sports fields), outside of the LWS designation, it is unlikely that it will have any long lasting effects on the local bat population since there are few opportunities for foraging or sheltering within that area. However it is still possible that any lighting installations, as part of the development, may negatively affect bats. Therefore, further surveys with regards to the use of the site by bats may be required.

4.2.4 Mammals

The scrub-woodland habitats associated with Site 2 provide a rich and diverse landscape for a number of small bodied mammal species including common and pygmy shrews, field and bank voles, woodmice and yellow-necked mice. Furthermore the dense understory provides a good resource for foraging and sheltering hedgehogs. A number of mole hills were recorded during the walk-over survey and evidence of foxes (spraints) were also recorded.

Site 1 is less likely to support a diverse range of mammal species since it consists of open, short-sward, heavily managed, amenity grassland.

4.2.5 Herpetofauna

The amenity grassland habitats on site offer negligible potential for the presence of widespread reptiles and amphibians. There is no tall grass or tussocky vegetation areas and most areas are heavily managed for recreational/sporting activities. Despite that, the scrub-woodland habitat immediately adjacent to Site 2 provides foraging and sheltering habitat potential for both reptiles and amphibians.

Consideration should be given to reptiles and amphibians when deciding which of the locations to site the proposed Adventure Zone. Reptiles are protected under the Wildlife and Countryside Act (as amended) 1981. It is an offence to intentionally kill or injure any of these species. Where destruction of these habitats is unavoidable then appropriate surveys to detect the presence and/or likely absence of species should be followed by a detailed mitigation strategy, were it is required.

In the unlikely event that a great crested newt is found during development operations then works must stop and the advice of an appropriately qualified and experienced ecologist should be obtained. The ecologist will advise on the appropriate course of action. There is a low-risk and works may be delayed whilst a licence is requested from Natural England.

4.2.6 Other species

Protected or notable species listed within table 3.6 above are considered unlikely to inhabit either of the proposed development sites and therefore no further consideration regarding those species is required. However, the diversity of trees and shrubs adjacent to Site 2 as well as some flowering plants offer good potential for invertebrate species to be found. In particular deadwood and leaf littler provides opportunities for sheltering and foraging for stag beetles (*Lucanus cervus)* and their larvae. Stag beetles are a Species of Principal Importance (SPI) and are considered conservation priorities under the UK Post-2010 Biodiversity Framework.

There are a number of mature, veteran, ancient and champion trees noted throughout Mote Park and some are located within the proposed development site (Site 2 in particular). The trees on site may be subject to a Tree Preservation Order (TPO). A Tree Preservation Order is a written order made by a local planning authority (e.g. a borough, district or unitary council or a national park authority) which, in general, makes it an offence to cut down, top, lop, uproot, wilfully damage or wilfully destroy a tree protected by that order without the authority's permission. An

order can protect anything from a single tree to all trees within a defined area or woodland. The local planning authority should be contacted before any works are carried out that might affect trees protected by this order. Further information can be obtained in the Town and Country Planning (Tree Preservation) (England) Regulations 2012.

4.2.7 Invasive non-native species

All invasive non-native species recorded in section 3.4 (Table 3.7) above are listed under Section 41(1) of the Wildife and Countryside Act.

The Act makes it illegal to release or allow to escape into the wild any animal which is not ordinarily resident in Great Britain and is not a regular visitor to Great Britain in a wild state, or is listed in Schedule 9 to the Act. It is also illegal to plant or otherwise cause to grow in the wild any plant listed in Schedule 9 to the Act. The Schedule 9 list of animal and plant species has been amended by the Wildlife and Countryside Act 1981 (Variation of Schedule 9) (England and Wales) Order 2010.

It is important that the location of invasive non-native plants on site are identified ahead of the proposed development. It is also important that development activities do not cause any non-native species to move around the park or to an offsite location during site clearance works without an appropriate licence being granted by the statutory authority.

5.0 Conclusions and Recommendations

5.1 Habitats

The majority of the habitats on site comprise amenity (improved) grassland with parkland scattered trees. There are two disparate sites that are currently being considered as potential locations for the Mote Park - 'Adventure Zone', Site 1 - Sports fields and Site 2 - Pitch and putt golf course and scrub-woodland habitat.

It is clear from the desk top study together with evidence gathered during the walkover survey that the development location least likely to impact biodiversity interests of the park is within Site 1 (see Appendix B). Site 1 is outside of the Mote Park and River Len LWS and offers the only place that is unlikely to have a long-term, negative impact on the local biodiversity interests of the park. The whole of Site 1 consists of amenity grassland that is managed for sports and recreation.

Site 2 (see Appendix B) is understood to be a second choice location by Maidstone Borough Council and an alternative site evaluated in lieu of any concerns that may arise with plans for development of Site 1. When compared with Site 1, Site 2 is noted to have a much greater biodiversity interest. Whilst part of Site 2 is intensively managed amenity grassland, almost half of it consists of scrub-woodland habitat. Site 2 also forms part of the Mote Park and River Len LWS because of it parkland setting and its mature and veteran trees.

Recent activities undertaken by the local wildlife recording groups, such as the Kent Bat Group, have shown that Site 2 is an important commuting and foraging area for protected wildlife. The area also provides a rich source of food as well as sheltering habitat for a number of species including invertebrates, birds and bats.

Furthermore any proposals to develop within Site 2 will need to consider the impact on the mature and veteran trees that are scattered throughout the area. The trees on site may be protected by a preservation order and any works undertaken as part of the proposed development of the site should be subject to a management strategy and/or method statement prepared in conjunction with an arboricultural specialist and supplied to the local planning authority for further consideration.

There are three sites of nature conservation importance (LNRs) within 1 km of the development site and are considered to be valued ecological receptors, furthermore there is a SSSI within 2.3 km of the site, which is noted for it geological interest. Although a specific impact risk assessment has not been carried out as part of this preliminary study, consideration has been given to the potential of the proposed development to impact the ecological interests of the designated sites. At the present time it is considered that the 'Adventure Zone', consisting of an open air, adventure playground, will have no/negligible impact during or after site operations, as they are all outside the zone of influence of the proposed development.

5.2 Species

Depending on the final design plans for the Adventure Zone, further ecological surveys may be required. In particular surveys for bats as indicated in section 4.2 above. Also consideration should be given to the design and implementation of a lighting strategy for the proposed Adventure Zone. The following guidelines are provided by the Bat Conservation Trust:

- *Consider 'no lighting' solutions where possible.*
- *Consider employing a competent lighting designer who will apply the principals of providing the right light, in the right place, at the right time and controlled by the right system.*
- *Minimise the spread of light to at, or near horizontal and ensure that only the task area is lit. Flat cut-off lanterns or accessories should be used to shield or direct light to where it is required and away from the woodland and hedgerows.*
- *Lighting column height should be carefully considered to balance task and mitigation measures.*
- *Use temporary close-boarded fencing until vegetation matures, to shield sensitive areas from lighting.*
- *Limit the times that lights are on to provide some dark periods. A lighting designer can vary the lighting levels as the use of the area changes, reducing lighting levels or perhaps even switching installations off after certain times. This use of adaptive lighting can tailor the installation to suit human health and safety as well as wildlife needs.*

The National Planning Policy (2012), paragraph 125 states that *"..planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation*".

For further information regarding bats and the effects of lighting on wildlife can be found via the following websites - www.bats.org.uk and www.batsandlighting.co.uk.

All bats are protected under the Wildlife and Countryside Act (1981) (as amended); and by the Conservation of Habitats and Species Regulations (2010).

Furthermore, it is likely that reptiles, such as slow-worms and grass snakes, together with some amphibians my occupy the scrub-woodland habitat areas of Site 2 of the proposed development site. Widespread reptiles are protected under Section 9(1) of the Wildlife and Countryside Act against intentional killing and injuring. Therefore presence and/or likely absence surveys for protected species should be followed by an appropriate mitigation strategy in the event that habitats, likely to contain reptile species, are likely to be impacted by the proposed development.

There is a requirement to avoid contravention of the legalisation relating to nesting birds in the UK (See Wildlife and Countryside Act 1981, Appendix A). It is considered an offence to intentionally take, damage or destroy the nest of any wild bird while it is in use or being built, or take or destroy the egg of any wild bird. It is also an offence to disturb any wild bird listed on Schedule 1 of the Act whilst it is nest building, or is at a nest contain eggs or young, or to disturb the dependent young of any such bird. Therefore all tree, scrub and vegetation removal should take place outside of the bird breeding season (March-August). If this is not possible then a pre-construction nesting bird survey by a suitably qualified ecologist will be required.

5.3 Ecological enhancements

The National Planning Policy (2012), paragraph 114 states that local planning authorities should - "*set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure".* The proposed development provides the opportunity to create habitat for species of principal importance and for conservation/enhancement of biodiversity.

The existing over-flow car park, Site 3 (see section 3.3 above and Appendix B) has been highlighted as a potential site for biodiversity enhancement. It is understood that Maidstone Borough Council wish to move the existing over-flow car park facility to the amenity grassland area associated with potential development of the Adventure Zone at Site 1. This will move the existing facility outside of the Mote Park and River Len LWS boundary and provide an opportunity for regeneration of up to 1.56 hectares of parkland habitat.

Creation of new habitat for biodiversity should reflect the existing park flora and fauna and be undertaken in consultation with the Kent Wildife Trust who currently hold the information reporting to the designation of the area as a Local Wildife Site.

The following section outlines a number of recommendation aimed at enhancing the ecological resources present on site.

Key Recommendations:

- To maximise the opportunities for wildlife within Site 3, all planting proposed on site should include species that provide a source of nectar and pollen for insects, and berries for birds. A comprehensive planting strategy should be provided by an appointed landscape team in consultation with the Kent Wildife Trust. Some examples of tree species may include field maple (*Acer campestre*), common hornbeam (*Carinus betulus*), hawthorn (C*rataegus laevigata*), spindle (*Euonymus europaeus*), cherry (*Prunus sp.*), dog-rose (*Rosa canina*), rowan (*Sorbus aucuparia*), elder (*Sambucus nigra*) and crab apple (*Malus sylvestris*). Some flowering plants may include species such as foxglove (*Digitalis purpurea.*), cowslips (*Primula veris*), knapweed (*Centaurea sp.*), ox eye daisy (*Leucanthemum vulgare*), bluebells (*Hyacinthoides non-scripta*) and wood anemone (*Anemone nemorosa*).

- It is recommend that the current mowing regime be reduced to allow a mixed sward to proliferate. Cutting or strimming of the grassland should be reduced to coincide with meadow grassland management elsewhere in the Park.

- Areas of bare earth should be tilled and seeded with a grass seed mix typical of the meadow structure elsewhere in the park.

- Any new lighting should be designed and positioned to minimise impacts on any bats and other wildlife that may be utilising the surrounding area. Lights should avoid linear features that could be used by commuting bats such as hedgerows and site boundaries. Low pressure sodium lamps should be used as opposed to high pressure sodium or mercury lamps, and brightness should be as low as possible. Lighting should be directional, aimed only where it is needed and lighting across the site should be positioned so as to allow some completely dark areas of habitat.

- The adoption of a management practices on the site that are sensitive to biodiversity and aim to maximise the value of the site should be a priority. Such strategies should take into account the locations of nearby ecological receptors and seek to create linkages with the wider landscape. Areas of unmanaged habitats should be left within the site, with shorter sward grassland progressing to tall sward and shrubs of various sizes, rather than mowing up to the edge of trees and shrubs.

Additional Recommendations

- Where appropriate consideration should be given to the erection of bird nest boxes within the site, on the trees. These should include boxes that are suitable for the use by species known to occur in the local area, such as marsh tits, blue tits and great tits among others.

- Where appropriate consideration should be given to the erection of bat boxes within the site, on trees. Information on the design and placement of bat boxes can be found via the Bat Conservation Trust website (http://www.bats.org.uk/pages/bat_boxes.html).

- Consideration should be give to the creation of a pond, designed to maximise wildlife potential, supporting native aquatic or marginal vegetation will help to increase invertebrate

diversity on the site, and thus provide a food source for other species such as birds and bats. Further information on the design and construction of a wildlife friendly pond can be found via the Freshwater Habitats Trust website www.freshwaterhabitats.org.uk.

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Appendix A

Wildlife Legislation & Policy

Conservation of Habitats and Species Regulations 2010

The Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490) are the principal means by which the European Habitats Directive is transposed in England and Wales. The Regulations provide for the designation and protection of a network of 'European Sites' termed Natura 2000, the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites.

Regulation 41 relates to the protection of European Protected Species listed under Schedule 2 of the Regulations. Taken together it is an offence to undertake the following acts with regard to European Protected Species:

- deliberately capture, injure or kill any wild animal of a European Protected Species;
- deliberately disturb animals of any such species in such a way as to be likely to:
    - impair their ability to survive, breed, rear or nurture their young, hibernate or migrate, or
    - affect significantly the local distribution or abundance of the species to which they belong;
- deliberately take or destroy the eggs of such an animal; or
- damage or destroy a breeding site or resting place of such an animal.

The disturbance offence is generally taken to refer to a discernible effect at population level and biogeographic level, rather than simply to an individual animal. However, in certain circumstances the disturbance of one individual animal may have population level effects.

The Regulations also make it an offence (subject to exceptions) to deliberately pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5.

However, the actions listed above can be made lawful through the granting of licences (European Protected Species Licence) by the appropriate authorities (Natural England in England). Licences may be granted for a number of purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority has determined that the following regulations are satisfied:

The works under the licence are being carried out for the purposes of 'preserving public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment'.

- there is 'no satisfactory alternative'
- the action 'will not be detrimental to the maintenance of the population of the species concerned at favourable conservation status in their natural range'.

To apply for a licence, the following information is required:

- The species concerned.
- The size of the population at the site (note this may require a survey to be carried out at a particular time of the year).

- The impact(s) (if any) that the development is likely to have upon the populations.
- What measures will be conducted to mitigate for the impact(s).

The Wildlife & Countryside Act 1981

The Wildlife & Countryside Act 1981 (as amended) is the principal piece of UK legislation relating to the protection of wildlife. It consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive) in Great Britain.

The Act provides protection to areas of land designated as Sites of Special Scientific Interest (SSSI).

The Act makes it an offence (with exception to species listed in Schedule 2) to intentionally kill, injure, or take any wild bird or their eggs or nests. Special penalties are available for offences related to birds listed on Schedule 1, for which there are additional offences of disturbing these birds at their nests, or their dependent young.

The Act makes it an offence (subject to exceptions) to intentionally kill, injure, or take, possess, or trade in any wild animal listed in Schedule 5, and prohibits interference with places used for shelter or protection, or intentionally disturbing animals occupying such places. The Act also prohibits certain methods of killing, injuring, or taking wild animals listed in Schedule 6.

The Act makes it an offence (subject to exceptions) to pick, uproot, trade in, or possess (for the purposes of trade) any wild plant listed in Schedule 8, and prohibits the unauthorised intentional uprooting of such plants.

The Act contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9. It also provides a mechanism making any of the above offences legal through the granting of licences by the appropriate authorities.

The Countryside and Rights of Way Act 2000

The Countryside and Rights of Way Act 2000 (CRoW) was passed to provide additional levels of protection for wildlife whilst also strengthening the protection afforded to Sites of Special Scientific Interest.

Schedule 12 of the Act amends the Wildlife and Countryside Act 1981, strengthening the legal protection for threatened species. The provisions make certain offences 'arrestable', create a new offence of ‘reckless’ disturbance, confer greater powers to police and wildlife inspectors for entering premises and obtaining wildlife tissue samples for DNA analysis, and enable heavier penalties on conviction of wildlife offences.

Natural Environment & Rural Communities Act 2006

The Natural Environment & Rural Communities Act 2006 (NERC) is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government policy.

It was created to make provision in connection with wildlife, Sites of Special Scientific Interest, National Parks and the Broads; to amend the law relating to rights of way; to make provision as to the Inland Waterways Amenity Advisory Council; to provide for flexible administrative arrangements in connection with functions relating to the environment and rural affairs and certain other functions; and for connected purposes.

Section 40 of NERC carries an extension of the earlier CRoW Act biodiversity duty to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity. Section 41 requires the Secretary of State, as respects England, to publish a list of the living organisms and types of habitat which in the Secretary of State's opinion are of principal importance for the purpose of conserving biodiversity. The updated list was published in May 2008.

Photograph 2. Garage building. Roof was replaced at the time of the survey

UK Post-2010 Biodiversity Framework

The Environment Departments of all four governments in the UK work together through the Four Countries Biodiversity Group. Together they have agreed, and Ministers have signed, a framework of priorities for UK-level work for the Convention on Biological Diversity. Published on 17 July 2012, the 'UK Post-2010 Biodiversity Framework' covers the period from 2011 to 2020.
Most work which was previously carried out under the UK Biodiversity Action Plan (UK BAP) is now focussed in the countries. The UK BAP partnership no longer operates. Further information about the country biodiversity strategies can be found through the country-level biodiversity web-page (http://jncc.defra.gov.uk/page-5701).

Many of the tools developed under UK BAP remain of use, for example, background information about the lists of priority habitats and species, which can be found on the priority species and habitats web-pages (http://jncc.defra.gov.uk/page-5705). The lists of priority species and habitats agreed under UK BAP still form the basis of much biodiversity work in the countries.

The Animal Welfare Act 2006

Photograph 3. Gable end to existing house showing air bricks leading to cavity wall, above window and air slot at the apex. Possible bat entry points. View from west to east.

Prior to the Animal Welfare Act 2006, people only had a duty to ensure that an animal didn't suffer unnecessarily. The new Act keeps this duty but also imposes a broader duty of care on anyone responsible for an animal to take reasonable steps to ensure that the animal's needs are met. This means that a person has to look after the animal's welfare as well as ensure that it does not suffer. The Act says that an animal's welfare needs include:

- a suitable environment (how it is housed);
- a suitable diet (what it eats and drinks);
- the ability to exhibit normal behaviour patterns;
- any need it has to be housed with, or apart from, other animals; and
- protection from pain, suffering, injury and disease.

With regards to development, this may have implications when translocations of animals are proposed. As such, care must be taken to ensure that any receptor sites are suitable for the species in terms of habitat and carrying capacity.

The Wild Mammals (Protection) Act 1996

The Wild Mammals (Protection) Act 1996 makes it an offence for any person to mutilate, kick, beat, nail or

Photograph 4. Air bricks leading to cavity wall, possible entry points for bats. View from south to north.

otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

The Hedgerows Regulations 1997

The Hedgerows Regulations 1997 were introduced to protect hedgerows of importance from destruction. However the legislation does not apply to any hedgerow (even if it is within the list above) which is within or marking the boundary of the curtilage of a dwelling house.

For the Regulations to be applicable, the hedgerow must be at least 20 metres in length or, if less than 20 metres, it must meet another hedgerow at each end. A hedgerow is deemed to be important if it is more than thirty years old and meets at least one of the criteria listed in Part II of Schedule 1 of the Regulations.

If a hedgerow which qualifies under the Regulations is to be removed, the landowner must contact the Local Planning Authority (LPA) in writing by submitting a hedgerow removal notice. The LPA then has a period of 42 days to decide whether or not the hedgerow meets the importance criteria of the regulations.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) replaces Planning Policy Statement 9: Biodiversity and Geological Conservation (PPS 9) (ODPM 2005b) and sets out the view of central Government on how planners should balance nature conservation with development and helps ensure that Government meets

its biodiversity commitments with regard to the operation of the planning system. One of the key principles of the NPPF is:

“LPAs should aim to conserve and enhance biodiversity by applying a number of principles, including the encouragement of opportunities to incorporate biodiversity in and around developments”.

The NPPF states that development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their areas, including biodiversity. It also states that the aim of planning decisions should be to prevent harm to biodiversity conservation interests and to ‘promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species’.

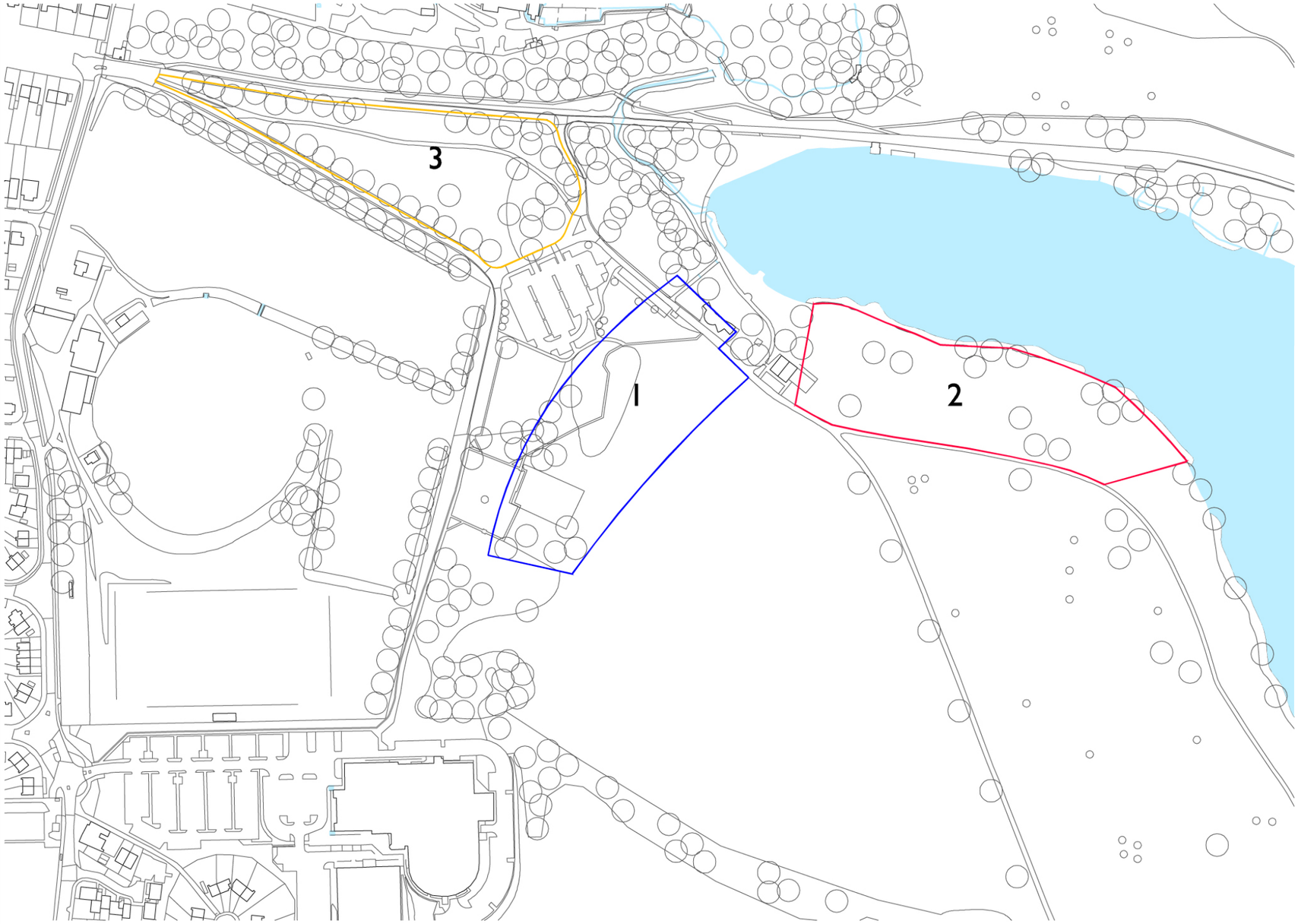
To minimise impacts on biodiversity (in particular reference to undesignated nature conservation sites) and geodiversity, planning policies should ‘identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation’.

Where determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principals; ‘if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused’; and, ‘planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss’.

This means that full ecological surveys should be carried out and suitable mitigation measures proposed prior to any planning application being submitted. It is common practice for planning officers to consult Natural England or other conservation bodies for advice regarding the suitability of proposals in relation to biodiversity conservation.

Appendix B

Site Map - Proposed development sites and area for biodiversity enhancement



Mote Park Adventure Zone

Site Map - Proposed development sites and area for biodiversity enhancement.

Legend

- Site 1 - Sports fields
- Site 2 - Pitch & Putt golf course and scrub-woodland habitat
- Site 3 - Over-flow car park, proposed biodiversity enhancement area.
- Lake

Lewis Ecology

	Drawing No. 001	N W E S
Date: 10-11-2015	Drawn by: Allen Scott Ltd	
Created by: BL	Plan Source: Allen Scott Ltd	

Appendix C

Site Photographs

Mote Park Adventure Zone

Photograph - Site 1

Sports Fields

Lewis Ecology

Date: 10-11–2015	Photo No. 001
Created by: BL	Photo by: Lewis Ecology

N W E S

Mote Park Adventure Zone

Photograph - Site 2

Pitch & Putt golf course and scrub-woodland habitat.

Lewis Ecology

Date: 10-11–2015	Photo No. 002
Created by: BL	Photo by: Lewis Ecology

Mote Park Adventure Zone

Photograph - Site 3

Over-flow car park, proposed area for biodiversity enhancement.

Lewis Ecology

Date: 10-11–2015	Photo No. 003
Created by: BL	Photo by: Lewis Ecology

W S N E