



# Adelaide Farm Dwellings, Hacklinge, Kent

## **BIODIVERSITY ENHANCEMENT PLAN**

TO ADDRESS CONDITION 17  
OF PLANNING CONSENT

22/01334

Mr & Mrs Farrington (via EZ Plans)

April 2024

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# 1 Introduction

## 1.1 BACKGROUND & OBJECTIVE

Andrews Wildlife Consultants Ltd (AWC) was previously commissioned by Mr. & Mrs. Farrington (via their designers: EZ Plans) to undertake Preliminary Ecological Appraisals (PEAs) in support of plans to demolish and rebuild the existing Adelaide Farm Café building (AWC 2021a) and the attached residential units (AWC 2023) on this site. Also, the initial PEA (AWC 2021a) indicated that the café building had moderate potential for bat roosting, and therefore a bat survey consisting of two appropriately timed survey visits to identify any roosting activity was undertaken in 2021 (AWC 2021b).

The proposals subsequently received planning permission (Applications 20/00246 and 22/01334) with several conditions relating to ecology/biodiversity attached to the latter consent (22/01334). One of these conditions was as follows:

### ***Condition 17 – (Biodiversity Enhancement Plan)***

*No works above ground level shall commence until the details of the locations, specifications, and timings of measures and/or features to enhance biodiversity on the site have been submitted to and approved in writing by the Local Planning Authority. These enhancements will include bat and bird boxes integrated into the new buildings, features for hedgehogs, including 13 x 13 cm gaps in close-board fencing, and native species planting, together with the recommendations in section 4 of the Preliminary Ecological Appraisal prepared by Andrews Wildlife Consultants and dated February 2023. The approved details will be implemented in accordance with the approved details and the approved timings and shall thereafter retained in accordance with the approved details.*

*Reason: These details are required prior to work above ground level to protect and enhance existing species and habitat on the site in the future.*

This report provides the required enhancement plan to discharge Condition 17 of Application 22/01334.

This report has been prepared by Richard Andrews who is a Fellow of the Chartered Institute of Ecology and Environmental Management (CIEEM): registration number 1332. He is also a Chartered Environmentalist through the Society for the Environment (reg. 2261).

## 1.2 STUDY AREA & LOCATION

The location of the study site is on Sandwich Road, Hacklinge, Kent as shown in Figure 1 (Grid reference: TR342 541). The site consists of a disused café building and an attached residential annex building at the rear of the old café. A large gravel driveway serving the café and adjacent farm is situated immediately to the west and north-west of the café. There are also some small, landscaped (garden) areas to the north and south of the building which

include grasses, tall herbs, shrubs and trees. To the immediate south of (adjacent) the site is the slow-flowing South Stream watercourse which forms part of the Sandwich Bay to Hacklinge Marshes SSSI and overlapping Thanet Coast & Sandwich Bay Ramsar site.

The site is situated within a wider low-lying landscape dominated by arable crops and freshwater coastal grazing marsh dissected by ditches and streams, much of which is formally designated for nature conservation.

**Figure 1 – Site Location:** Approximate site boundary shown by red outline.



### 1.3 LIMITATIONS

The enhancements described in this report are based on the existing habitats and field-signs of species evident on the dates and times of various survey visits. Ecological surveys are limited by factors which affect the presence of plants and animals, such as the time of year, ranging patterns and behaviour. Therefore, the absence of evidence of any particular species should not be taken as conclusive proof that the species is not present or that it will not be present in the future.

The absence of desk study records cannot be relied upon to infer absence of a species or habitat. Often, the absence of records is a result of under-recording within the given data-search area.

The above limitations are not considered likely to significantly affect the relevance or effectiveness of this Biodiversity Enhancement Plan.

This report deals with matters of legal significance but does not constitute professional legal advice. The Client may wish to seek professional legal interpretation of the relevant wildlife legislation cited in this document, which is summarised in **Section 2**.

## 2 Legislative Context

### 2.1 THE WILDLIFE & COUNTRYSIDE ACT 1981 (AS AMENDED)

The Act creates the following offences relevant to this study:

- To intentionally or recklessly kill, injure, or take, possess, or trade in any wild animal listed in Schedule 5, and intentionally or recklessly interfere with places used for shelter or protection or disturb animals occupying such places.

It also provides a mechanism making any of the above offences legal through the granting of licences by the appropriate authorities.

### 2.2 CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2017 (AS AMENDED)

Regulation 43 of the regulations creates the following offences relating to European Protected Species (EPS) such as bats, otter and beaver:

- 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
  - significantly affect 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.

However, the actions listed above can be made lawful through the granting of licences (EPS Licence) by the appropriate authorities (e.g. Natural England in England). Licences may be granted for several purposes, 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'.

### 2.3 NATURAL ENVIRONMENT & RURAL COMMUNITIES (NERC) ACT 2006

Section 40 of NERC imposes a duty on 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 species and habitats which are of 'principal importance for the purpose of conserving biodiversity'. These lists generally reflect the species and habitats previously listed as priorities under the UK Biodiversity Action Plan, known as 'priority' species or habitats.

### 2.4 PROTECTION OF BADGERS ACT 1992

This makes it an offence to wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so and to intentionally or recklessly interfere with a sett (den). Sett interference includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access to it.

Under Section 10 (1)(d) of the Protection of Badgers Act 1992, a licence may be granted by Natural England to interfere with a badger sett for the purpose of development, as defined by Section 55(1) of the Town & Country Planning Act 1990.

### 3. Previous Studies that Inform this Enhancement Plan

This Biodiversity Enhancement Plan is informed by the following baseline ecological studies undertaken for the consented developments:

- Andrews Wildlife Consultants (AWC) (2021a). *Adelaide Farm Café, Hacklinge, Kent – Preliminary Ecological Appraisal*. Report for Mr. Farrington, July 2021.
- Andrews Wildlife Consultants (AWC) (2021b). *Adelaide Farm Café, Hacklinge, Kent – Bat Survey Report*. Report for Mr. Farrington, August 2021.
- Andrews Wildlife Consultants (AWC) (2023). *Adelaide Farm Café, Hacklinge, Kent: Replacement dwellings to rear of Café – Preliminary Ecological Appraisal*. Report for Mr. Farrington, February 2023.
- Andrews Wildlife Consultants (AWC) (2024a). *Adelaide Farm Café, Hacklinge, Kent: Mammal Survey and Mitigation Report to Address Condition 15 of Planning Consent 22/01334*. Report for Mr. & Mrs. Farrington, April 2024.
- Andrews Wildlife Consultants (AWC) (2024b). *Adelaide Farm Café, Hacklinge, Kent: Species Mitigation Method Statement to Address Condition 16 of Planning Consent 22/01334*. Report for Mr. & Mrs. Farrington, April 2024.
- Martin Newcombe Wildlife Management Consultancy (2016). *The Adelaide Café, Sandwich Road, Worth, Kent – Ecological Scoping and Bat Building Survey*. Report for Mr. Farrington, December 2016.

These documents should be referred to for details of the methodologies and results of the ecological desk-studies and surveys.



## 4. Biodiversity Enhancements

### 4.1 SPECIES-RICH WILDFLOWER SEEDING

The landscaped areas within the red line boundary of the new residential units are very small and will be subject to uncertain management largely dictated by the tenants of the new units. The gardens are likely to be managed as regularly-mown amenity grassland. Therefore, these areas are not the most suitable for species-rich native seeding and management.

Instead, the area of grassland between the immediately adjacent café building, which is to be rebuilt, and the South Stream provides a suitable area for sward enhancement for biodiversity that is within the same land ownership (Enhancement Location 1 in Figure 2).

Here, once the new café building has been built, an area of minimum 45 m<sup>2</sup> of remaining sward and disturbed ground will be prepared and seeded with a native wildflower grassland seed-mix such as Emorsgate Seed's EM2 mix (or similar), which has the following native species composition:

#### Wild flowers – 15%

- *Agrimonia eupatoria* – Agrimony
- *Centurea nigra* – Common knapweed
- *Daucus carota* – Wild carrot
- *Galium verum* – Lady's bedstraw
- *Knautia arvensis* – Field scabious
- *Lathyrus pratensis* – Meadow vetchling
- *Leontodon hispidus* – Rough hawkbit
- *Leucanthemum vulgare* – Oxeye daisy
- *Malva moschata* – Musk mallow
- *Plantago lanceolata* – Ribwort plantain
- *Poterium sanguisorba ssp sanguisorba* – Salad burnet
- *Primula veris* – Cowslip
- *Prunella vulgaris* – Selfheal
- *Ranunculus bulbosus* – Bulbous buttercup
- *Vicia cracca* – Tufted vetch

#### Grasses – 85%

- *Agrostis capillaris* – Common bent
- *Cynosurus cristatus* – Crested dogstail
- *Festuca rubra* – Red fescue
- *Phleum bertolonii* – Smaller cat's-tail
- *Poa pratensis* – Smooth-stalked meadow-grass

Emorsgate Seeds provide the following guidance for planting and management, which will be implemented by the landowner:

- **Ground preparation:** Good preparation is essential to success so aim to control weeds and produce a good quality seed bed before sowing. To prepare a seed bed, first remove weeds using repeated cultivation. Then plough or dig to bury the surface vegetation, harrow or rake to produce a medium tilth, and roll, or tread, to produce a firm surface. The ground should not be fertilised.
- **Sowing:** Seed is best sown in the autumn or spring but can be sown at other times of the year if there is sufficient warmth and moisture. The seed must be surface sown and can be applied by machine or broadcast by hand. To get an even distribution, divide the seed into two or more parts and sow in overlapping sections. Do not incorporate or cover the seed, but firm in with a roll, or by treading, to give good soil/seed contact.
- **First year management:** Most of the sown meadow species are perennial and are slow to establish. Soon after sowing there will be a flush of annual weeds, arising from the soil seed bank. These weeds can look unsightly, but they will offer shelter to the sown seedlings, are great for invertebrates, and they will die before the year is out. So, resist cutting the annual weeds until mid to late summer. Then cut, remove and compost. Early August is a good time. This will reveal the young meadow, which can then be kept short by grazing or mowing through to the end of March of the following year. Dig out any residual perennial weeds such as docks.
- **Management once established:** The new wildflower grassland will not be cut or grazed from spring through to late July/August to give the sown species an opportunity to flower. After flowering, in July or August take a 'hay cut': cut back with a scythe, strimmer or mower to c. 50mm. Leave the 'hay' to dry and shed seed for 1-7 days then remove from site. Then mow or graze the re-growth through to late autumn/winter to c. 50mm and again in spring if needed. Avoid any fertilisation.

#### 4.2 BAT ROOSTING STRUCTURES

Once the new café building has been built, where possible, a minimum of two artificial bat roosting structures (such as 'bat bricks' and/or 'bat tiles') will be integrated into the outer walls and/or roof of the new buildings (Enhancement Location 2 in Figure 2). If this can be proven to not be possible by the designer and/or contractor because of the nature of the new external walls/roof, then a minimum of two bat roost boxes will be permanently fixed onto the buildings' exterior. In either case, these roost structures will be placed as high as possible (ideally min. 4m) on the warmer, sheltered south-facing elevation of the building(s), facing the South Stream corridor, which is ideal for bat foraging. They will be placed away from artificial light sources and windows.

The bat roost structures must be a tried-and-tested commercial product made of environmentally-friendly durable materials which has not been treated with chemicals that could harm animals.

Once these roost structures are in place, they must not be opened or otherwise disturbed except by a licensed bat worker. Care should be taken to ensure the entrances do not become obstructed by trees and creepers.

Refer to the Bat Conservation Trust's 'Bat Box Information Pack' for more detailed advice (freely available for download on the Trust's website).

#### 4.3 BIRD NESTING STRUCTURES

Once the new café building has been built, where possible, a minimum of two artificial bird nesting structures for swifts ('swift bricks') will be integrated into the outer walls of the new buildings (Enhancement Location 3 in Figure 2). If this can be proven to not be possible because of the nature of the new external walls/roof, then a minimum of two swift nest boxes will be permanently fixed onto the buildings' exterior. In either case, these structures will be placed as high as possible (min. 5m), at least 1m apart and away from windows and where there is some shading. Under the eaves is ideal. They will be placed away from artificial light sources.

The swift nest structures must be a tried-and-tested commercial product made of environmentally-friendly, durable materials which have not been treated with chemicals that could harm animals.

Care should be taken to ensure the entrances do not become obstructed by trees and creepers.

#### 4.4 INSECT NESTING STRUCTURE

Once the new café building has been built, at least one insect house/'bug box' will be installed on the warmer south-facing side of the new buildings (Enhancement Location 4 in Figure 2), within or immediately adjacent to the new native wildflower grassland (Section 4.1). This will benefit species of e.g. ladybirds, lacewings and solitary bees, and it will help pollinate the new wildflowers and manage pest species.

The insect house must be a tried-and-tested commercial product made of environmentally-friendly, durable materials which have not been treated with chemicals that could harm animals.

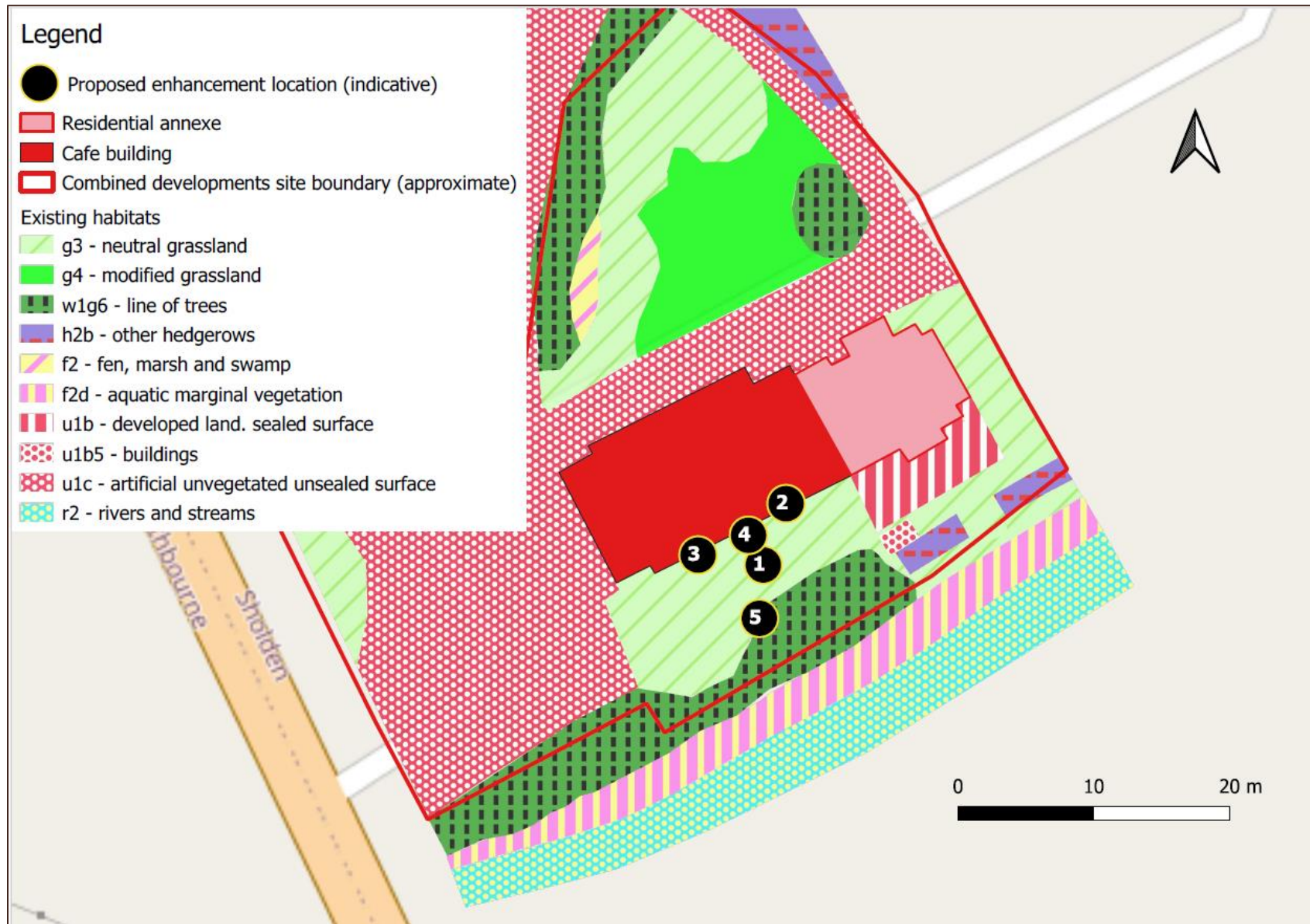
#### 4.5 STRUCTURES FOR HEDGEHOG, REPTILES AND AMPHIBIANS

A compact pile, minimum 1m width x 2m length and 1m height, of untreated logs and smaller branches will be created immediately adjacent to (but not within) the new wildflower grassland area (Enhancement Location 5 in Figure 2) where it can remain

undisturbed and allowed to decay. This will provide valuable sheltering and foraging habitat for reptiles, amphibians, invertebrates and hedgehogs along the South Stream corridor.

A separate mitigation plan for the proposed developments has been prepared to address planning condition 16 (AWC 2024b) which includes the provision of reinforced hedgehog gaps ('hedgehog highways') in the bottom of all new garden fences. These are mitigations rather than enhancements, so are not detailed here.

**Figure 2** *Indicative locations of biodiversity enhancements (refer to main text for enhancement descriptions)*



#### 4.6 ENHANCEMENT TIMETABLE

Action	When	Who
Ground preparation and sowing of wildflower seed mix	Autumn or spring following completion of the new café building.	Landowner/contractor
Watering of seeded area	During dry spells in the weeks and months after sowing.	Landowner
Wildflower grassland cutting and removal of cuttings	Early August to March only, following establishment.	Landowner
Installation of bat and bird boxes/bricks	During construction (bricks) or following completion of construction (boxes)	Contractor
Installation of insect house	Following completion of construction and wildflower grassland sowing.	Landowner
Construction of log-pile	Following completion of construction and wildflower grassland sowing.	Landowner/contractor