

Appendix F.2

CHESHAM BOIS ECOLOGY REVIEW | FN23-138 | 04/12/2023



To Annette Dealey
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Dear Annette,

1. Introduction

1.1. Future Nature WTC was commissioned on 15th November 2023 to undertake a review of ecological information, informed by a site visit of the adjacent land, in respect of a planning application (Ref. PL/22/4074/FA) for redevelopment of the application site to provide a new Parish Centre within Chesham Bois village in Buckinghamshire.

1.2. This report provides the findings from the review of ecological information, and considers them in the context of the proposed redevelopment.

2. Background

2.1. The proposed redevelopment includes the demolition of the existing Parish Centre, associated outbuildings and the rectory, to be replaced by a new Parish Centre, inclusive of a café, day nursery building, rectory, detached garage, outbuildings and prayer room. New parking provision will also be provided.

2.2. The number of Parish Centre users accommodated by the proposed redevelopment will be significantly increased (i.e. from typically 50 people currently, to in excess of 400 people).

2.3. The planning application was supported by a preliminary ecological appraisal and preliminary roost assessment¹, with supplementary information subsequently provided in

¹ Preliminary Ecological Appraisal and Preliminary Roost Assessment, St Leonard's Parish Centre. Arbtech, 07/11/2023.

respect of Biodiversity Net Gain (BNG)², bats³ and newts⁴. Further badger information may also have been provided but was not identified, but is likely confidential in nature.

2.4. A site visit was undertaken by the author on November 24th 2023, which included a walkover of the nearby common land in order to understand the ecological context of the site, with some parts of the site visible from the site boundary. The author (Adam Price BSc (Hons), MSc) is experienced in undertaking a wide variety of ecological surveys, including habitat surveys, biodiversity net gain assessments and protected species surveys.

3. Ecological Considerations

Designated Sites

3.1. No information on non-statutory designated sites (e.g. Local Wildlife Sites) is included in the submitted ecology reporting, with the report stating that a 'biological records search' is not considered necessary. Non-statutory designated sites can however be a material planning consideration, and are vulnerable to impacts from development⁵. Accordingly, CIEEM guidance⁶ specifies that it will 'only not be appropriate to obtain data from the above listed bodies [Local Environmental Record Centres] in the very occasional cases where the information identified in paragraph 3.2 can be obtained by other means and that 'background data searches will generally not be considered adequate by the Local Planning Authority or other regulatory authority if they rely entirely on open access data...'

3.2 Given the significant increase in the capacity of visitors to a new Parish Centre under the proposals, there is the potential for visitor pressure to increase at any such designated sites. Indeed the woodland adjacent to the site (which is a Priority Habitat, discussed further below), lies within the Chesham Bois Conservation Area and is readily accessible from the application site through well used footpaths. Such pressures could include damage to sensitive habitat through increased footfall, littering and noise or other disturbance to flora and fauna.

² Biodiversity Net Gain Assessment, St Leonard's Parish Centre. Arbtech, 01/02/2023 and associated Amended Biodiversity Metric 3.1, 01/02/2023.

³ Bat Mitigation Plan, St Leonard's Parish Centre. Arbtech, 21/04/2023.

⁴ Great Crested Newt eDNA Survey, St Leonard's Parish Centre. Arbtech, 06/07/2023.

⁵ Forward to 2030: Biodiversity Action Plan, Buckinghamshire, Section 3.15.

⁶ Guidelines for Preliminary Ecological Appraisal, Second Edition. Chartered Institute of Ecology and Environmental Management. November 2017.

3.3. Potential adverse impacts on any non-statutory sites which may be present in the local area should therefore be considered.

Habitats

3.4. An area of woodland, part of Chesham Bois Common, is located adjacent to the application site. This woodland is classified as the Priority Habitat 'deciduous woodland' and is situated within the Chesham Bois Conservation Area. The woodland is accessible through public footpaths at the western and eastern end, with well-used tracks running through the woodland itself.

3.5. The habitat map within the submitted ecology reporting identified an area of woodland as extending into the periphery of the site, albeit this is not included within the BNG metric and subsequent biodiversity net gain information. The habitat description describes tree and shrub species present, but the ground flora is not detailed (aside from a reference to common nettle *Urtica dioica*). This habitat should be considered within the reporting (whether it is included within the red line or immediately adjacent to it), as there is the potential for adverse impacts to occur, such as disturbance to flora and fauna from increased footfall, noise and littering. Currently only damage or pollution from construction are mentioned.

3.6. It was clear during the site visit that the woodland adjacent to the application site accords with its Priority Habitat designation. Despite the time of year being sub-optimal, a number of species were recorded within the ground flora in close proximity to the application site, which included garlic mustard *Alliaria petiolata*, pendulous sedge *Carex pendula*, herb Robert *Geranium robertianum*, wood-false brome *Brachypodium sylvaticum*, cow parsley *Anthriscus sylvestris*, wood avens *Geum urbanum*, hedge woundwort *Stachys sylvatica*. Further west, species such as dog's mercury *Mercurialis perennis* and likely wood sedge *Carex sylvatica* were additionally noted.



Example of woodland ground flora evident in winter, near footpath in close proximity to application site.



Second example of woodland ground flora evident in winter, near footpath in close proximity to application site.

3.7. This likely represents an under representation of the ground flora community present, with many species not being detectable at the time of year surveyed. Given the potential for increased visitor pressure arising from use of the proposed Parish Centre, it is considered that the woodland ground flora should be assessed within the optimal season (i.e. in early spring), in order to understand the current ecological value and sensitivity to increased footfall, in addition to other pressures such as non-native invasive garden escapes.

3.8. Furthermore, a fire pit is proposed within the southern section of the application site, in close proximity to existing boundary vegetation with connectivity to woodland within the adjacent common land. This therefore presents a risk of fire spreading to ecologically valuable neighbouring habitats.

3.9. Disturbance to fauna which may utilise the woodland habitat is discussed further below.

Biodiversity Net Gain (BNG)

3.10. The submitted Biodiversity Net Gain information indicates a net gain of 37.3% (3.07 habitat units) within the 3.1 version of the metric. Much of this gain is attributable to new tree planting, which provides 8.06 habitat units. 72 trees have been proposed which are of a 'medium' size. Proposing new tree planting at such a high density, particularly when interspersed with area of hardstanding, is likely to be difficult to realistically achieve, with trees requiring greater than a 30cm diameter at breast height, and 10.8m Root Protection

Area radius under the Biodiversity Metric 3.1 guidance⁷. Clarification should also be given as to whether any woodland habitat is included in the baseline area, as this is currently not included in the metric.

3.11. The new Statutory Metric has since been released, which will become mandatory in due course and supersede all previous versions of the metric. Guidance⁸ which accompanies the Statutory Metric has revised how trees are input into the metric, which includes a significant change in how trees are assessed. The guidance states that 'you should categorise most newly planted individual trees as 'small', unless the tree is medium sized or above at the time of planting.'

3.12. Under this latest guidance, the proposed trees, categorised as 'small' in size, would only provide an additional 0.9 units. The corresponding BNG result would therefore reduce significantly to -49.86% (-4.1 units). If proposing trees already in a 'medium' size this still only provides 3.58 units, and a corresponding output of -17.15% (-1.41 units).

3.13. It is acknowledged that this guidance would not have been available when calculating the BNG output for the planning submission. However the guidance now clearly recognises that proposing large numbers of individual trees within a site overestimates their ecological value. Existing trees should preferably be retained.

3.14. The proposed habitat also includes a green roof. Although green roofs can provide valuable new opportunities for wildlife, in the context of the site they will not replace the open terrestrial habitat suitable for various fauna, as described below. Regardless of the BNG result, the mitigation hierarchy should be followed⁹.

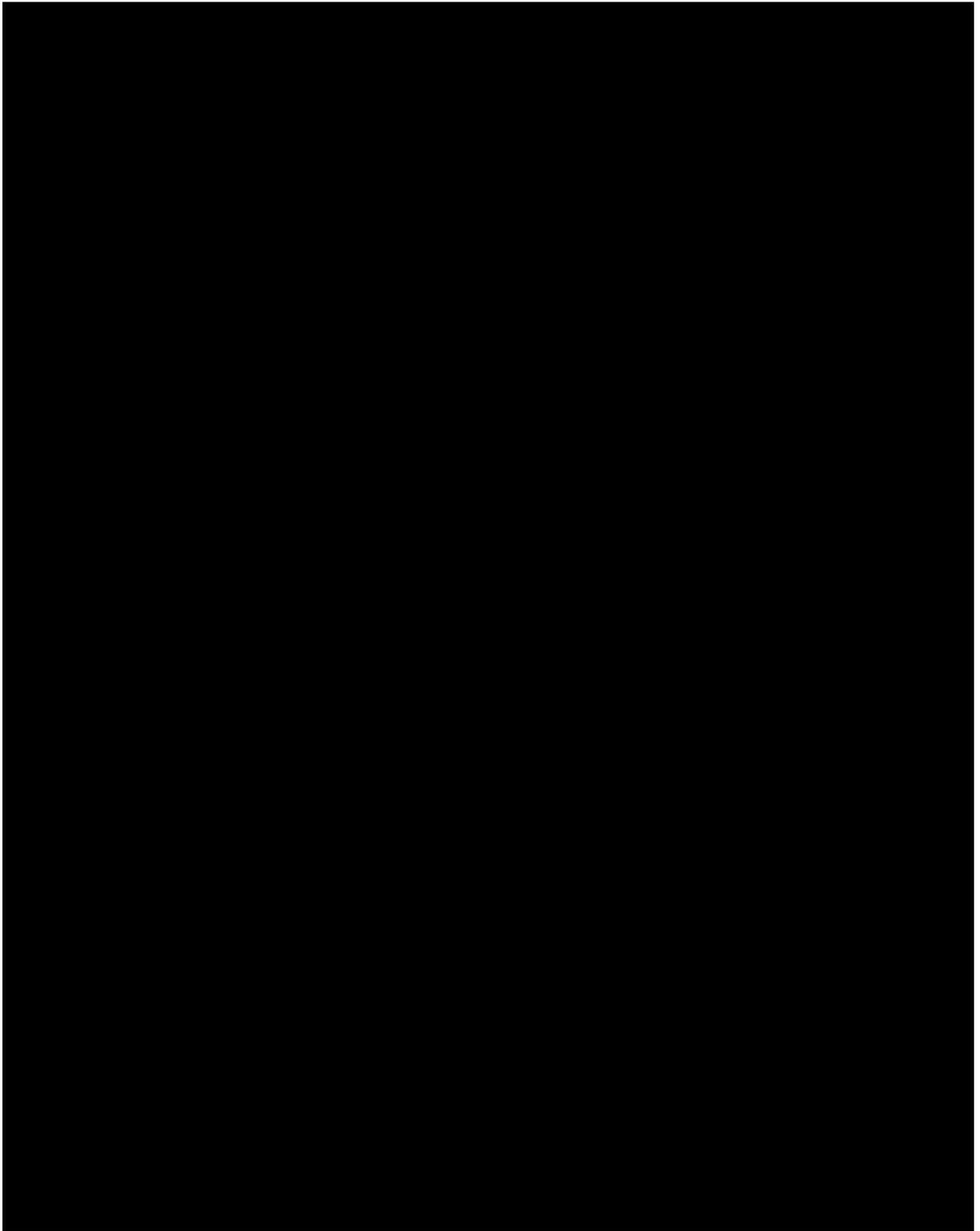
3.15. The proposed woodland at the site is small and fragmented in nature, surrounded by hardstanding car park, and would likely struggle to achieve a moderate condition as is currently targeted.

⁷ Biodiversity Metric 3.1, Auditing and accounting for biodiversity. Natural England Joint Publication JP039, April 2022.

⁸ The Statutory Biodiversity Metric, User Guide (draft), November 2023

⁹ Guidelines for Ecological Impact Assessment in the UK and Ireland. Chartered Institute of Ecology and Environmental management, September 2018.

Protected Species – Badgers



3.22. Badgers at or adjacent to the site will also face increased noise disturbance from the greater numbers of visitors to the application site, in addition to disturbance from the longer hours of operation and any increase in lighting provision. Badgers, which are protected from killing or injuring under the Protection of Badgers Act 1992, may also be at a greater risk from road traffic collisions.

3.23. It is therefore considered that further detailed survey work should be undertaken to identify badger activity in the site's surroundings. If this has already been undertaken, but is not available on the planning portal due to confidentiality issues surrounding badgers and their persecution, the local badger group should be consulted to ensure all known badger activity is accounted for.

Protected Species – Bats

3.24. The submitted ecology information confirms that a number of bat roosts are present within existing buildings at the site, including day roosts, a transitional roost and maternity roosts of the species common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus* and brown long-eared bat *Plecotus auritus*. Other opportunities for roosting bats were noted during the site visit, within the woodland adjacent to site, such as from deadwood and rot holes on mature trees.

3.25. The submitted ecology reporting also describes potential foraging, roosting and commuting habitat, at the application site and nearby. This includes 'small, scattered woodland copses' and acknowledges the potential importance of the Chilterns Area of Natural Beauty c. 500m north from the application site, though would seem to undervalue the potential habitat available (discussed further below).

3.26. No data search for bat species records in the local area has been undertaken. Given the presence of Chesham Bois Wood, a relatively large area of ancient woodland (c. 20ha), located approximately 450m north west from the site and managed by the Woodland Trust,

¹⁰ The minimum buffer when considering safeguards for badger setts, due to sett tunnel construction.

it is considered that there is the potential for an important assemblage of bats to be present in the local area.

3.27 Chesham Bois Wood is well connected to the site through a tree belt along Great Bois Wood road, which in turn connects to the woodland located adjacent to site. The woodland adjacent to site therefore may provide an important resource for bats in the local area.

3.28. Other parcels of ancient woodland and Priority Habitat woodland are present within the local area, which also likely support important bat assemblages.

3.29. The design of the new Parish Centre building complex includes extensive glazing and skylights, and as such is unlikely to be as suitable for bats compared to the current site buildings, due to the light spill and lack of potential roost features such as roof tiles. Furthermore, the majority of bat roosting activity was recorded at the existing rectory building (including soprano pipistrelle and brown long-eared maternity roosts which are more sensitive to light disturbance), whilst the new roosting provision (namely the bat loft, proposed to compensate for losses to maternity roosts) appears to be included on the new rectory building. The new rectory building is proposed to be located in the northern part of the site, further from the Priority woodland habitat and closer to the road, and will therefore require bats to pass the new Parish Building and areas of car park hardstanding. This will potentially reduce the uptake of the new roosting provision.

3.30. The new lighting scheme will likely increase light disturbance to bats, given the extended hours of operation proposed (i.e. hire available from 07:00 to 23:00 daily), in addition to disturbance arising from smoke at the proposed fire pit and increased noise disturbance.

3.31. Bats are fully protected under UK law¹¹ including from killing and injuring and damaging roosts or disturbing bats in their roosts. Therefore further consideration should be given to the presence of bats in the local area, onsite roosting provision and any adverse impacts which may occur as a result of the proposals.

¹¹ Wildlife and Countryside Act (1981) as amended. Conservation of Habitats and Species Regulations (2017) (as amended).

Protected Species – Great Crested Newts (and other Amphibians)

3.32. Submitted ecological information indicates that two ponds are located within 500m of the site. One pond was subject to environmental DNA (eDNA) tests which confirmed the likely absence of this species in 2019 and 2023, the other was dry at the time of survey.

3.33. An additional three ponds are however located within 500m of the site (c. 250m away), clustered together at an approximate central grid reference of SU 96316 99212. These ponds are all considered to provide potential breeding opportunities for Great Crested Newts (and other amphibians, please see below discussion regarding common toads *Bufo bufo*), with good quality terrestrial habitat also provided by the surrounding woodland.



Woodland pond located approximately 250m from application site, conferring opportunities for Great Crested Newts and other amphibians.



Second woodland pond providing opportunities for amphibians.



Third woodland pond with the least potential to support amphibians, being smaller in size.

3.34. These ponds do not appear to have been considered during the survey work to date, or surveyed for the presence of the protected species Great Crested Newt¹² *Triturus cristatus*.

3.35. Natural England standing advice¹³ requires that suitable waterbodies within 500m of a development site should be considered for the presence of this species. The habitat surrounding these woodland ponds is well connected to the site via the woodland habitat. Great Crested Newts are fully protected under UK law¹⁴, including their eggs, breeding sites and resting places. Further survey work should therefore be undertaken in order to ensure sufficient mitigation measures are implemented in respect of this species.

3.36. Other amphibians such as common toads, also appear not to have been considered, with no data search undertaken for records of this species. Common toads are particularly susceptible to increases in traffic volume, and other threats such as gully pots and the fragmentation of migration routes between breeding ponds and terrestrial habitats¹⁵. The proposals will result in the loss of an area of grassland habitat, replaced by hardstanding. As a species of principal importance¹⁶, planning authorities are required to ensure this species is protected from the adverse effects of development.

Other Fauna

3.37. The woodland adjacent to site is likely to support a breeding bird assemblage at least of local importance, especially given the habitat connectivity to large parcels of ancient woodland in the local area, such as the previously mentioned Chesham Bois Wood.

3.38. A significant increase in the number of visitors utilising the site has the potential to cause disturbance to the breeding bird assemblage present, such as through a new lighting scheme, noise disturbance and smoke from the proposed fire pit. Should any Schedule 1¹⁷ birds be present at or near to site (currently not determined by a data search), disturbance

¹² A European Protected Species; Conservation of Habitats and Species Regulations 2017.

¹³ [Great crested newts: advice for making planning decisions](https://www.gov.uk/guidance/great-crested-newts-advice-for-making-planning-decisions) - GOV.UK (www.gov.uk)

¹⁴ Wildlife and Countryside Act (1981) as amended. Conservation of Habitats and Species Regulations (2017) (as amended).

¹⁵ Common toads and roads. Guidance for planners and highways engineers (England). Amphibian and Reptile Conservation, 2009.

¹⁶ Section 40 of the Natural Environment and Rural Communities [NERC] Act 2006.

¹⁷ Wildlife and Countryside Act (1981) as amended.

would constitute an offense. The glazing and skylights on the proposed Parish Centre will also alter the character of buildings at the site, and may increase the risk of bird collisions.

3.39. No species record search or other survey work in respect of the bird assemblage at, or in close proximity to, the application site has been undertaken to quantify the potential for any adverse impacts arising from the proposals.

3.40. New fencing is proposed at the application site. This will form a barrier to fauna which utilise the woodland and the application site for foraging, such as badgers and other mammals, such as hedgehogs which are suffering significant declines due to habitat loss and fragmentation.

4. Conclusion

4.1. A review of the submitted ecological information, informed by a site visit to nearby habitats, has concluded that there are a number of potential adverse ecological impacts which could occur as a result of the proposals.

4.2. These impacts include increased disturbance to valuable adjacent habitats, and the fauna that these habitats support, such as bats, badgers, birds and amphibians.

4.3. The new habitat provision at the application site, may also be overvaluing the proposed habitats, given the latest biodiversity net gain guidance, increase in areas of built footprint, and loss of terrestrial habitat.

4.4. Should the development therefore proceed as is currently proposed, a detrimental impact may therefore occur to local biodiversity, which works against local Biodiversity Action Plan¹⁸ objectives, namely;

'1. Retain enhance, expand and create priority habitats everywhere – with a focus on BOAs and strategically-identified areas.'

'4. Create and manage buffers around existing and new areas of priority habitat and other core and high quality biodiversity and habitat sites following best practice guidelines.....*to improve resilience and enhance the visual characteristics of the landscape.*'

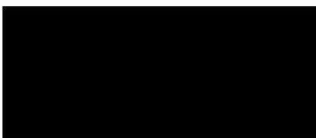
¹⁸ Forward to 2030: Biodiversity Action Plan, Buckinghamshire, Chapter 4.

- '5. Connect quality habitats across the landscape to enable species movement across larger areas to improve habitat and species resilience to external pressures, with a focus on connectivity within and between BOAs as well as into the wider landscape. *Actions are needed to both reduce the risk of biodiversity loss and provide opportunities for biodiversity to migrate and adapt to changing circumstances e.g. climate change. Improved connectivity can provide important re-connected habitats for a range of specialist species and they can also provide natural buffers to flood events which erode soils, lower water quality, flood our homes and damage our economy.'*

4.5. The proposals may also not be in line with objectives in local planning policy, i.e. Policy CS24: Biodiversity in the Core Strategy for Chiltern District¹⁹, which states that 'development proposals should protect biodiversity' and 'enhance any ecological interest'.

I trust the above is helpful, please do share this report with the planning authority as required, and do let me know if you have any queries.

Yours Sincerely,



Adam Price

Consultant Ecologist
Future Nature WTC

¹⁹ [Core Startegy_Final_Web_Version_2012_aCjnMQz.pdf \(buckinghamshire-gov-uk.s3.amazonaws.com\)](#)