



## Cadent gas pipeline diversion

Environmental concerns regarding the proposed route 4 through the Blue Mills nature reserve

*Anne and Mark Cathcart (Blue Mills)*

# Contents

1. COVERING LETTTER AND SUMMARY
2. A DESCRIPTION OF THE BLUE MILLS NATURE RESERVE AND ITS ENVIRONMENTAL ASSETS
3. THE CHOICE OF ROUTE PUT FORWARD TO THE PLANNING INSPECTORATE WAS NOT AN INFORMED CHOICE
4. THE ADVISABILITY OF ROUTES 1 AND 3 INSTEAD OF THE PROPOSED ROUTE 4
5. THE ENVIRONMENTAL IMPACT OF THE CURRENTLY PROPOSED DIVERSION ROUTE 4 ON THE BLUE MILLS NATURE RESERVE
  - IMPACT ON PROTECTED HABITATS AND TREES
  - IMPACT ON OTTERS
  - IMPACT ON RED KITES, WATER VOLES AND BATS
  - IMPACT ON OTHER PROTECTED SPECIES
6. THE IMPACT ON LOCAL LANDSCAPE CHARACTER AND LOCAL AMENITIES SUCH AS THE ISHAMS CHASE FOOTPATH
  - IMPACT ON LOCAL LANDSCAPE CHARACTER
  - IMPACT ON THE ISHAMS CHASE FOOTPATH
7. OUR PROPOSED LEAST ENVIRONMENTALLY DAMAGING ROUTE IF THE CURRENT ROUTE 4 CORRIDOR IS UPHELD

## APPENDIX A

Concerns on the completeness and accuracy of the applicant's consultation *Environmental Report*

## APPENDIX B

A sample of the wildlife observed at Blue Mills by the owners

## 1. COVERING LETTER AND SUMMARY

Mr Adrian Hunter  
Lead Member of the Examining Authority  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

Mr and Mrs Cathcart

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Your ref: PINS ref TR010060

Our ref: Interested Party number 20033024

Report served via portal and nature films served via email: A12chelmsfordA120@planninginspectorate.gov.uk

Dear Sirs

Submission to the Planning Inspectorate in respect of the proposed Cadent gas pipeline diversion near Witham (TR010060 A12 Chelmsford to A120 Widening Scheme – Gas Pipeline Diversion)

Procedural Deadline 2 – Written Representation – 13 February 2023

We write to expand the comments we made in our Relevant Representation.

### Summary

We strongly object to diversion routes 2, 4 and 5 on ecological grounds. We consider routes 1 or 3 to be considerably less environmentally damaging. We note that, compared to routes 1 and 3, the currently proposed route corridor 4 would create significant additional adverse impacts in the following Highways key policy areas of: protecting the river environment; protecting the landscape and rare habitats of the Blackwater valley, including deciduous woodlands, reedbeds, hedgerows and wet woodland; and protecting the area's valuable and endangered wildlife, notably otters, water voles, bats and red kites.

We do not wish any part of our land to be compulsorily purchased.

This report details our specific concerns about the environmental impact of the currently proposed diversion route 4 on the Blue Mills nature reserve and adjoining strip of ancient woodland, and the impact on the amenity value of the Ishams Chase footpath. We highlight how the current proposal was not informed by any survey data. We also lay out the least damaging path for the pipeline, were the current routing to be upheld.

Objections to the proposed route have also been made by Maldon District Council, Wickham Bishops Parish Council, the Essex Wildlife Trust, along with members of the local community who enjoy the footpath.

Yours sincerely,

Mark Cathcart MA(Cantab)  
Anne Cathcart-Taylor BA(Hons), FCA

13 February 2023

#### **Uploaded files**

1. Nature-cam footage of the otter next to his holt (*duration - 26 seconds*).
2. Nature-cam footage of a water vole in the reed-beds (*duration - 15 seconds*).
3. Film clip showing the height, girth and majesty of the veteran poplar on 'otter island' (*duration – 14 seconds*).



## 2. A DESCRIPTION OF THE BLUE MILLS NATURE RESERVE AND ENVIRONMENTAL ASSETS

### The Blue Mills nature reserve

The nature reserve contains a number of priority habitats such as reedbed and wet woodland, rivers and ponds, adjoins ancient woodland and contains a large number of trees including a significant number which would be classed as rare, ancient, historic, veteran and/or notable.

Wet woodland is one of the most dynamic natural habitats in the UK and is almost extinct in lowland Britain and inland reedbeds are becoming increasingly rare and isolated.



### Development of the reserve

The 5-6 acre site has been developed as a nature reserve by the current owners during the entirety of their 22-year tenure. Previously installed drainage ditches were allowed to silt up and former reed-beds re-established themselves over a 5-year period. In 2001, a several acre native woodland was planted to complement the

adjoining strip of mature woodland and to provide additional riverside food and shelter for birdlife. Moisture loving trees such as specialist species of willows and two swamp cypress were planted along with a number of native trees.

In addition to rewilding the area of the reserve, the entire 11 acre Blue Mills gardens were managed sympathetically for wildlife, with the riverside vegetation being left to nature and the planting of new trees and hedgerows.

Before long, the Environment Agency confirmed the presence of otters. Water voles began frequenting the river and water-filled former drainage ditches, moving downstream from the Witham River Walk colony. Small mammals, songbirds and associated raptors colonized the area, including Red Kites who nested in the tallest oak trees of the adjoining woodland. The site became a breeding site for slowworms. As the riverside mosaic habitat at Blue Mills is attractive to numerous species of bat, pipistrelle (likely soprano pipistrelle given the proximity of water) and brown long eared bats roost in Blue Mill's outbuildings and are commonly seen hunting along the entire length of the river corridor, from the house to the far end of the nature reserve.

### **Blue Mills veteran trees including its rare female Black Poplars**

The majority of the veteran trees on the reserve lie on the north eastern boundary adjoining the neighboring strip of mature woodland. They are the doomsday listed Blue Mills ancient tree and ditch property boundary and they run the entire length of the nature reserve. This tree/ditchline also coincides with the edge of the floodplain.

Of the remaining mature trees on the reserve, of particular note are two ancient, veteran female Black Poplars (*populus nigra betulifolia*), an Essex Red Data List species. Also known as the 'native poplar' or 'water poplar' Black Poplars are the most endangered native timber tree in Britain. The female is the rarest, with only around 600 remaining in the UK.

Around 35 years ago, the Black Poplar sited by the river at the northernmost part of the Blue Mills nature reserve was sampled by renowned botanist Ken Adams and microsatellite DNA fingerprinted at Forest Research (Edinburgh), identifying it as female clone 32. There are only around 4-5 ancient trees of this clone surviving in North Essex. Two are at Blue Mills, the second being sited at the other end of the nature reserve, on the eastern boundary.

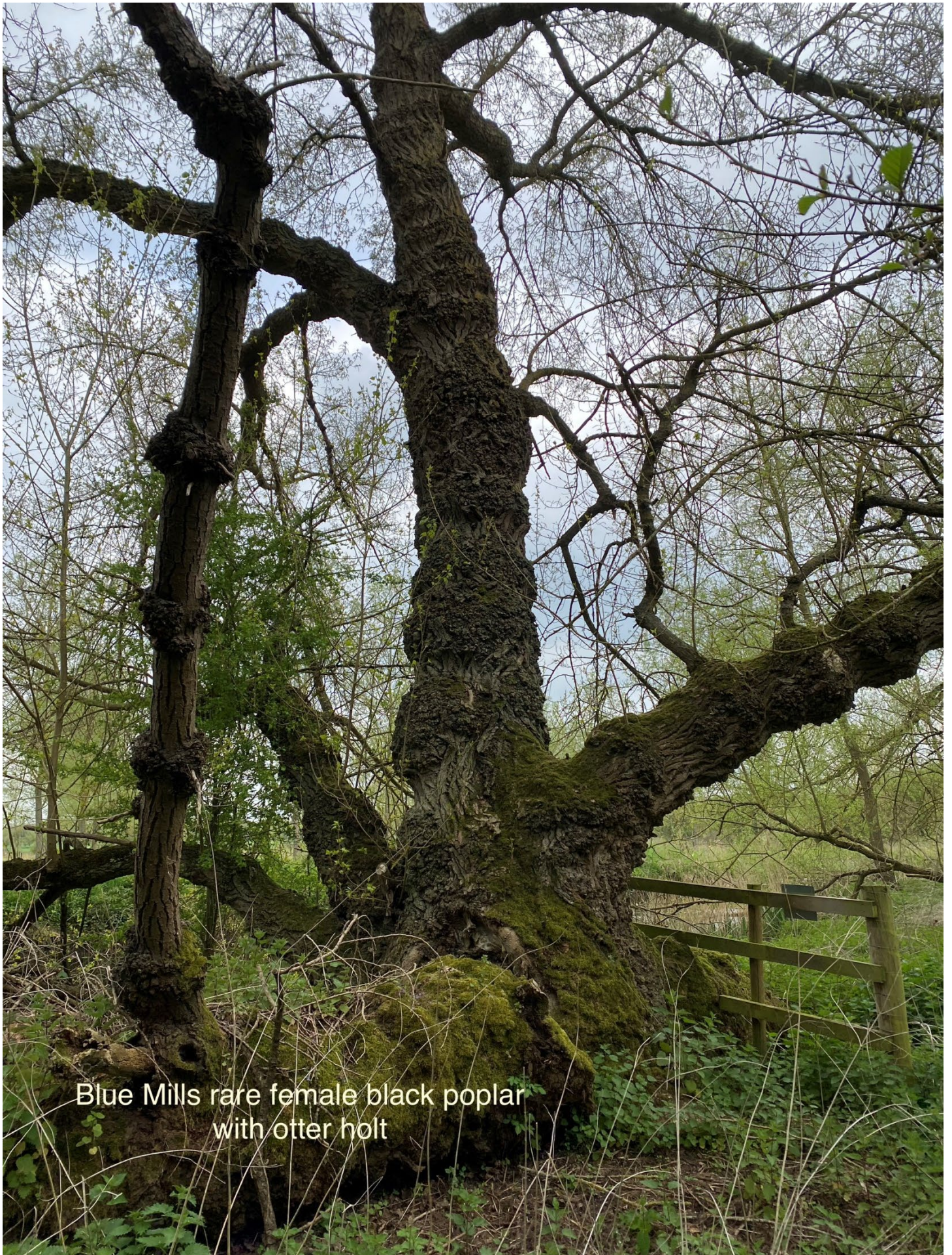
The Local Wildlife Site citation for Blue Mills nature reserve states: 'Both of the veteran Black Poplar are females of significant age and size, and are likely to be two of the largest examples of this increasingly rare species in Essex.'

Of particular additional note is the huge poplar on 'otter island', which is the tallest tree in the area, and visible from some considerable distance, including along the A12. We have uploaded a short film clip of this tree to illustrate its size.

### **The otter holt**

An otter holt has been confirmed in the riverside Black Poplar to the North of the reserve. The Local Wildlife Site citation states: 'Otters, fully protected under UK and European wildlife law, have been regularly recorded and an active bankside otter holt has been confirmed within the site, accompanied by trails, prints and fresh spraints.'





Blue Mills rare female black poplar  
with otter holt



## Awards and protection orders

In 2004, the Blue Mills nature reserve was awarded a Highly Commended in the Maldon District Conservation and Design Awards. It states: ‘The judges were impressed by the restoration of this natural English environment attracting natural species and wildlife to the area and allowing the fishing stock to increase by preventing fishing.’

The area of the reserve and adjoining woodland was awarded an area Tree Preservation Order in July 2022 by Maldon District Council (TPO MSA number 100018588).

The Blue Mills nature reserve was again recognized as being of substantive nature conservation interest when it was awarded a citation to be designated as a Local Wildlife Site by the Essex Wildlife Trust during a review commissioned by Maldon District Council in November 2022. The qualifying selection criteria are as follows:

HC18 Rivers

HC28 Small Component Mosaics

SC1 Vascular Plants

SC11 Otter holt

## Collaboration with other nature bodies

The owners have hosted a number of visits over the years from members of the Essex Wildlife Trust and collaborated with them on two projects – water DNA sampling to detect the presence of otters, and their recent River Connectivity project which seeks to reduce barriers along Essex rivers to enable fish cross breeding and stock replenishment along as much of our county’s river network as possible.

We have also recently collaborated with the Otter Trust - Earsham Wetland Centre & Dickleburgh Moor nature reserve by allowing them to take additional truncheons from our two veteran trees to add to the clone bank for Essex. They are planning to eventually plant trees propagated from our clone 32 females at Whetmead nature reserve, Brockwell Meadows, Bocking Blackwater, Abberton reservoir and Springfield Hall Park, Chelmsford.

### 3. THE CHOICE OF ROUTE PUT FORWARD TO THE PLANNING INSPECTORATE WAS NOT AN INFORMED CHOICE

The detailed pipeline diversion planning appears to have been a rushed, desk top exercise based on incomplete environmental survey data, with changes to one of the originally proposed routes being made at the very last minute, a week or so prior to the consultation starting on 9 November 2021.

Section A3.7 of the Supplementary Consultation: Environmental Report admits this when it states that ‘Ecology and tree surveys (including the identification of potential veteran trees), have not been carried out for the full extent of the area that would potentially be affected by the corridors. (We note that this belies the other statement included in the supplementary consultation brochure that the routes put forward ‘are designed to reduce impacts on properties, businesses and *ecologically sensitive areas*’.)

We consider that consequently the detailed environmental assessment included in that report to have been incomplete, inaccurate and misleading and we examine this in detail in Appendix A.

Significantly for Blue Mills, **when the Applicant submitted the DCO for approval by the Planning Inspectorate, no surveys had been carried out on their property.** Wildlife surveys did not start until July 2022 and are still underway. Tree and habitat surveys have still not been carried despite the owners twice prompting Ardent via email to do so during the past 6 months. A tree survey is now planned to start w/c 13 February 2023. We also wish it to be noted that no response was received from Ardent when they were informed of the existence of European Protected Species, the area Tree Preservation Order, or the citation as a Local Wildlife Site. This information was given to them at the earliest opportunity. Nor does any account appear to have been taken of the site's environmental details contained in the comprehensive report we submitted to the November/December 2021 consultation.

#### 4. THE ADVISABILITY OF ROUTES 1 AND 3 INSTEAD OF THE PROPOSED ROUTE 4

*The adverse impacts of route 4 are unnecessary as routes 1 and 3 provide a less damaging, satisfactory alternative.*

*We consider there to be a huge increase in ecological impact if diversion route 4 is adopted, a diversion which, in order to avoid a brownfield site, cuts a 20-30 metre wide strip of destruction through an area of fertile alluvial, wildlife-rich, greenfield land in the picturesque Blackwater valley and endangers the river environment and the animals which depend on it.*

*We believe that much of this impact will be permanent.*

We are concerned that diversions away from the A12 may be being sought to avoid the expense of the technical and health & safety accommodations which would be required in order to move the gas pipeline onto the borders of an old landfill site (Whetmead), as would be necessary if routes 1 and 3 were chosen.

We believe that diversion routes 1 and 3 are preferable from an environmental perspective because:

- An incursion onto the edge of the landfill site will be required in any case for the A12 road works, and we believe that the minor additional width for the gas pipeline would cause minimal incremental environmental effects.
- As routes 1 and 3 follow the A12, this would obviate the need for landscape destruction along such a wide access corridor, because the A12 roadway could serve as an access for the works.
- The impact of routes 1 and 3 on the river ecosystem is insignificant when compared with that of the currently proposed route. Routes 1 and 3 would still follow the existing crossing of the river Brain at the same point as the A12. However, the currently proposed diversion route 4 also crosses the river Blackwater as it borders/flows through the Blue Mills nature reserve, and it follows the river for an additional distance of one or two miles as diverts around two sides of the Whetmead triangle.

The choice of the current route in preference to routes 1 or 3 clearly does not adhere to the professed aims of Cadent's Environmental and Social Governance policies.

## 5. THE ENVIRONMENTAL IMPACT OF THE CURRENTLY PROPOSED DIVERSION ROUTE 4 ON THE BLUE MILLS NATURE RESERVE

### Impact on protected habitats and trees

*The route would damage and destroy large areas of priority habitat.*

Habitats protected under section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 affected by the routes include:

- Hedgerows
- Rivers
- Reedbed
- Lowland mixed deciduous woodland
- Wet woodland (on a floodplain and associated with a reedbed)

The water environment includes the River Blackwater, millrace, millpond and leat, streams, and a substantial ditch nestled in the reedbed.

*The route corridor crosses an unbroken belt of mature woodland containing veteran trees and also encompasses our riverside Black Poplar.*

### Impact on otters

*As the proposed route 4 corridor goes through the otter holt, the works could harm or displace the otter(s).*

Otters require an abundant, varied supply of food and hunt in river territories of up to 15 miles in length. During the construction phase, the proposed diversion route would restrict the river that they can hunt in to less than 3 miles' length.

Otters are sensitive to river pollution, even temporary, and the likely accidental spillages of soil, sediments, oils, fuels or chemicals during the construction phase could be highly damaging, even fatal, if the river is contaminated. Damage to their waterproof coats can result in drowning and the impact on river fish stocks could reduce their food supply.

Otters are secretive and sensitive to human incursion and require their holts to be free from disturbance. As most of the diversion route runs close to, or follows the river Blackwater, this will almost certainly result in the otters being distressed and displaced. The otters only arrived when the owners of Blue Mills restricted access (including their own) to the area.

Otters require plenty of riverside vegetation to lie up in during the day. The route would result in the destruction of a significant area of riverside vegetation, including trees and reedbeds, both at the river crossing onto the nature reserve and also along the considerable length the route now follows the river.

Much of the success of the Blue Mills wildlife sanctuary is because the owners have managed access and minimized disturbance to the wildlife, which is especially important for the otters. However, an easement giving third party rights of access for maintenance of the pipeline would stop them being able to do this in future.

## **Impact on red kites, water voles and bats**

*The diversion corridor potentially requires the nest trees to be cut down. Even if the actual trees are avoided, works destroying the surrounding trees or close to the nests would almost certainly displace the birds and deter them from breeding here in future.*

Red kites are extremely sensitive to human disturbance in the vicinity of their nests.

*Water voles inhabit our riverside vegetation and reedbeds. They would be made homeless through habitat loss and displaced by disturbance from the works.*

The route 4 corridor crosses the river and then cuts directly through the reedbeds.

*Bats live and hunt over the entire area, and especially by the river, and would be severely and permanently impacted from loss of, and disruption to, their feeding and roosting habitats.*

At least two species of bat (brown long eared and pipistrelle) are widespread and there are likely to be many more, given the varied and ideal bat habitat. The co-incidence of rivers, ancient deciduous woodland with numerous veteran trees, along with old buildings and barns, are ideal for feeding and roosting.

## **Impact on other protected species**

*There are numerous other protected and endangered species concentrated in this area.*

There is an abundance and variety of wildlife on the reserve, including *European Protected Species*, and birds and animals protected under the Wildlife and Countryside Act 1981 and listed in section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

## **6. THE IMPACT ON LOCAL LANDSCAPE CHARACTER AND LOCAL AMENITIES SUCH AS THE ISHAMS CHASE FOOTPATH**

### **Impact on local landscape character**

As stated in the Supplementary Consultation brochure (p24), corridor 4 has 'the potential for significant effects on local landscape character and properties due to landscape loss' and 'significant effects from the loss of mature woodland which is difficult to mitigate due to the time required for replacement habitats to mature'. In addition, pipeline maintenance requirements can prevent tree replanting for future generations.

### **Impact on the Ishams Chase footpath**

A public footpath runs the full length of Ishams Chase, and this allows the local and wider community to share the enjoyment of this beautiful, ecologically valuable, and heritage rich area. At the start of the footpath, on the left, lies the picturesque Blue Mills house, mill and bridge. The first section of the footpath is lined with ancient hedgerows and trees and it then gains far reaching views over the surrounding area as it rises towards Glen Chantry. The gardens of Glen Chantry lie at the end of Ishams Chase, next to the public footpath, and are much enjoyed by passing walkers. The attractive Grade II listed Ishams Barn also lies directly on the footpath near the end of Ishams Chase.



As the footpath crosses the field to continue towards Little Braxted, it runs close to, and parallel with, the Blue Mills nature reserve and its magnificent boundary tree-line with adjoining strip of ancient woodland, affording a beautiful and impressive vista, enriching the footpath with nature, and shielding the view across to the A12. This is illustrated in the picture below.

We are concerned that a 20-30 metre gap might be cut directly through this tree line - the proposed route corridor crosses it at right angles- destroying its beauty and exposing the footpath to a direct view of the A12.





## 7. OUR PROPOSED LEAST ENVIRONMENTALLY DAMAGING ROUTE IF THE CURRENT ROUTE 4 CORRIDOR IS UPHELD

We recommend that the gas pipeline passes to the north of the Blue Mills nature reserve, following a route which we have arrived at in conjunction with the owners of the neighbouring woodland. This route will, we believe, minimize the ecological impact of the works and the impact on the landscape and the amenity value of the Ishams Chase footpath.

Our illustrations A-C below show the impact that the construction of the gas pipeline could have if it follows the currently proposed route. The pictures are also marked with our suggested route.

We have annotated the illustrations with the location of the female Black Poplar otter holt, red kite nests, and strip of ancient woodland, and highlighted the location of the footpath relative to these.

Of note is that trees on our suggested alternative route are only scrub trees (around 15 years old as they were earlier cut down for a water pipeline) and also that if this track were adopted, the rising land of Whetmead behind this cut through point would shield the footpath from the view of the A12.

We also propose that tunnelling be employed in the vicinity of the nature reserve and request that an enforceable assurance be given that the roots of the nearby Black Poplar will be given adequate clearance and that the tree canopy will be fully protected from damage by construction machinery.

Cadent has confirmed via email to a core shareholder's Environmental and Social Governance investment department that trenching will be avoided over any ecologically sensitive areas such as the Blue Mills nature reserve.

We also are anxious that the Planning Inspectorate ensure that English Nature guidelines on prohibiting construction during the period March to September be adhered fully in order to avoid unnecessary disturbance to wildlife during their breeding season.

Illustration A

Wide angle view of the Blue Mills nature reserve oak tree-line as seen from the footpath, with our suggested alternative pipeline route marked in yellow. This route would avoid cutting through our mature oaks and only affect young trees and scrub.

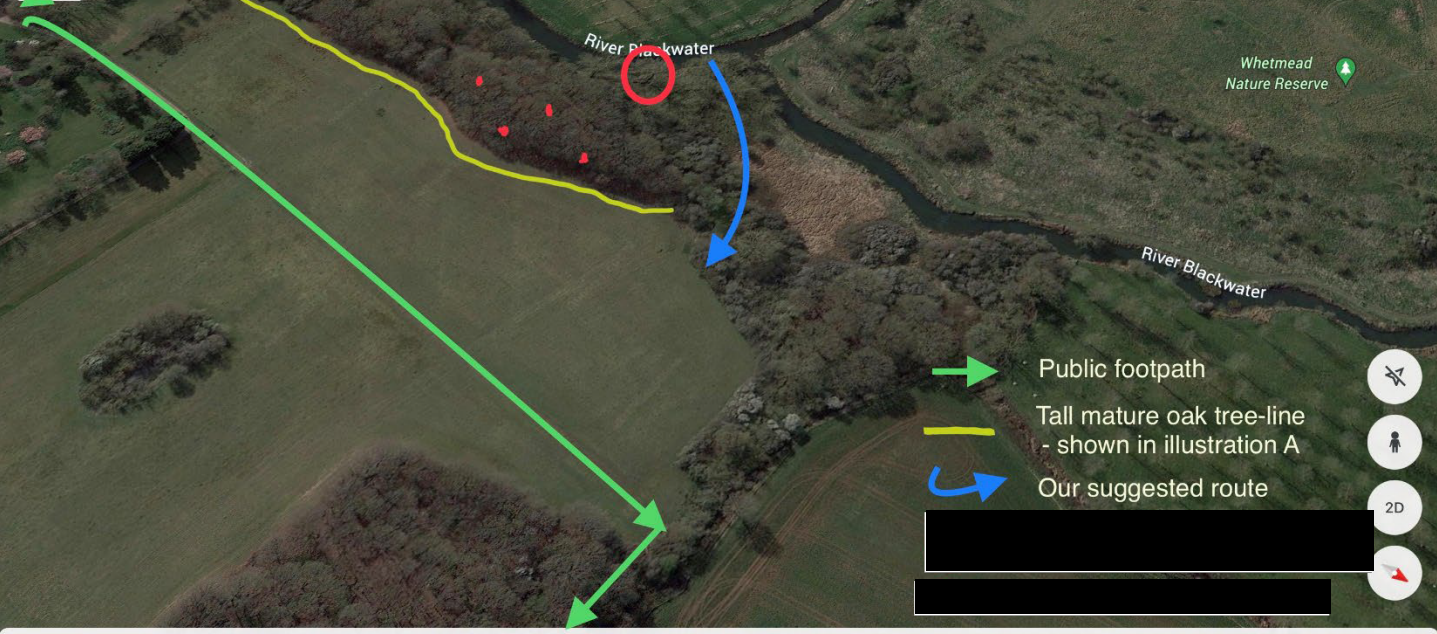
The impact of a 30m wide gap being cut at some point through our treeline is illustrated below in red. As can be seen, some of these trees are approaching 100 feet (30m) tall.





Illustration B

Aerial view of the Blue Mills nature reserve oak tree-line, with our suggested alternative pipeline route marked in blue. This would avoid cutting through our mature oak woodland, avoid the rare female black poplar with otter holt, the red kite nests, and only affect young trees and scrub.



- Public footpath
- Tall mature oak tree-line - shown in illustration A
- Our suggested route







## APPENDIX A

### Concerns on the completeness and accuracy of the applicant's consultation *Environmental Report*

The working table A.4 and the conclusions section A.5 in *the Supplementary Consultation: Environmental Report* was the preliminary assessment of affects for the diversion corridor put forward to the Planning Inspectorate. We consider that this report was incomplete, misleading or inaccurate and detail our concerns below.

This raises the questions as to whether, or to what extent, the fundamental assessments documented in these sections was carried out fully, and whether sufficient time was allocated to allow a considered assessment. It is of concern as the decision on which routes to put forward to consultation and for approval by the Planning Inspectorate should have been based on this assessment.

Excerpts from the report are shown in *magenta*.

#### Relating to table A.5 (Conclusions)

*A.5.1 ..most of the adverse effects would not be significant..*

For the reasons outlined elsewhere in our report, this hugely understates the ecological and landscape damage which would be caused by the diversion route.

*A.5.4 Vegetation loss as a result of construction...has the potential for significant effects on local landscape character and visual receptors.*

The route would damage local landscape character.

*A.5.4 This is also likely to cause significant effects during operation due to easements restrictions limiting replanting of trees above the HPP.*

The impact would therefore be long lasting. We cannot understand how the report elsewhere can refer to the effects of laying the pipeline as *temporary*.

The land along the river is an important wildlife corridor. Enforced tree gaps of some 20-30 metres would permanently disrupt this corridor. The area along the river around Blue Mills/Ishams chase is intermittently heavily wooded within the route corridor.

*A.5.5 All the corridors would result in the loss of woodland habitats which are more difficult to mitigate due to the time required for habitats to mature. Therefore, there would be a moderate adverse effect (significant effect) from all diversion options.*

We consider the reference to '*all diversion options*' to be misleading as routes 1 and 3 will result in little or no loss of woodland additional to that required for the extra lanes of the A12, and no loss of ancient woodland.

In addition, in respect of route 4, because of the significant impact on areas of mature mixed deciduous woodland and ancient hedgerows, these corridors would have more than a '*moderate adverse*' effect. Many of the trees which would require clearance are several hundred years old. Their maturity makes them suitable homes for bats and birds in trunk cavities and for otters in hollows in the tree base. Tree height and their rare grouping

with other similarly ancient trees and rare habitat makes them attractive to birds such as red kites. New tree planting **cannot** replace this, even if planting were allowed.

*A.5.5 Those corridors with the least impact on woodland habitat (ie those requiring the smallest area of woodland clearance) would have the least impact on biodiversity.*

This is a fact and clearly indicates that routes 1 and 3 should be chosen.

*A.5.6 Other habitat losses are more easily mitigated, and given the temporary nature of the impacts, are considered not significant.*

This is not correct. Reedbeds take around 5 years, by which time the wildlife which depends on it will have lost its source of food and shelter and may have died or been displaced. If they are displaced, there is a lack of suitable replacement habitat for them to go to while it regenerates. This is certainly the case for the otters and water voles.

#### [Relating to table A.4 \(route 4\)](#)

##### **Biodiversity**

There is no mention of the fragmentation of the River Blackwater wildlife corridor which would be caused by the route crossing the river onto the Blue Mills nature reserve. Some destruction of the vegetation is likely to take place during construction despite tunnelling techniques being used for the actual river crossing.

There is insufficient mention of the proliferation of bats, for which this riverine habitat is ideal, some of whose roosting sites may be in the veteran trees threatened by the development.

No mention is made of the mature mixed deciduous woodland, hedgerows, wet woodland and reedbeds on the Blue Mills nature reserve, which would be directly and **avoidably** in the path of the gas pipeline.

No mention is made of the wet woodland and the reedbed adjoining the Blue Mills property to the north.

**This is despite the fact that the reedbeds are visible by simple examination of the site via google earth.**

No mention is made of the numerous veteran trees on the site, and no mention is made of the fact that this route threatens cutting through this important belt of ancient woodland.

No mention is made of the presence of otters and water voles, and the existence of an otter holt on the property, despite this being notified to Ardent by email on 27 October 2021.

*The key constraints for this corridor are the same as corridor 2 (where corridor 2 states that: ..it is assessed that is unlikely that there would be significant effects on protected species).*

**This is inaccurate.** The homes and food supplies of otters, water voles, bats and red kites would be lost either permanently, or assuming new trees could be replanted, would be lost for several hundred years while new veteran trees grow, or five years for reedbeds to re-establish. As the habitat that the protected species depend on is rare, they could not move elsewhere. In addition, otters and red kites would not tolerate even close-by construction activity as they are very sensitive to disturbance.

The Blue Mills/Ishams Chase area provides a unique, diverse, interconnected collection of rare habitat. It is likely that many protected species would either be able to relocate or to remain and survive damage to or destruction of their habitat. **This view is supported by the Essex Wildlife Trust.**

### **Cultural heritage**

No mention is made of the impact on the setting of the listed building of Blue Mills. The wider setting of the land upriver is historically significant for a mill which typically owned the embanked floodplain upstream as it was required for the management of water flows. It would have been of limited use for growing arable crops but was typically used for other forms of agriculture such as cropping moisture loving timber trees such as poplars, for woodland or as floodplain grazing marsh. The area currently designated as a nature reserve has always been part of the Blue Mills property and was known in mediaeval times as 'Calloways Bottom'.

### **Road drainage and the water environment**

*Corridor 4 would only cross three unnamed watercourses.*

No mention is made of the multiple watercourses flowing into and crossing the Blue Mills nature reserve.

**We note that these and other statements throughout the report are being presented as fact despite no surveys having been carried out.**

### **Landscape and visual**

No mention is made of the ancient woodland and the many ancient and veteran trees in the Blue Mills nature reserve and surrounding areas.



## APPENDIX B

### A sample of the wildlife observed at Blue Mills by the owners

- Brown long eared bat (roosting site)
- (Soprano) pipistrelle bat (maternity roost)
- Bat foraging site
- Otter (otter holt, hunting and resting territory)
- Badger
- Red kite (breeding site)
- Buzzard (breeding site nearby)
- Kestrel (breeding site)
- Barn and tawny owl
- Mice, vole, shrew (important food species for raptors such as kestrels)
- Swallow (breeding site)
- Kingfisher (breeding site)
- Treecreeper
- Woodcock
- Waterfowl such as moorhen (breeding site), coot, little egret, heron, swan
- Nightingale and numerous other songbirds
- Grass snake
- Adder (breeding site)
- Slow worm (breeding site)

We previously uploaded a video montage to illustrate the nature on the site as part of our submission to request an Accompanied Site Inspection. As part of this current submission, we have also uploaded nature-cam footage of the otter next to his holt and of a water vole in the reedbeds.