

**DENVILLE HALL CARE HOME,
62 DUCK'S HILL ROAD,
NORTHWOOD**

**NOCTURNAL EMERGENCE /
DAWN RE-ENTRY BAT
SURVEYS**

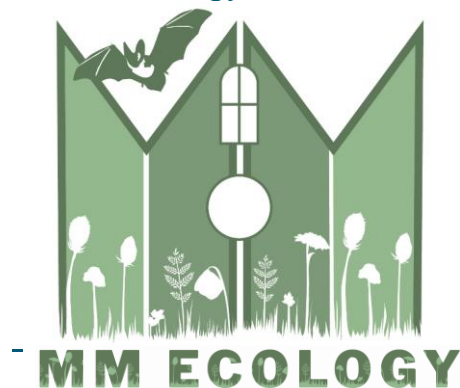


A Report to: Change Project Consulting

Date: October 2022

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1. INTRODUCTION

1.1 BACKGROUND

In June 2021, Change Project Consulting commissioned MMEcology to undertake a Preliminary Ecological Appraisal and Preliminary Roost Assessment at Denville Hall, 62 Duck's Hill Road, in Northwood, Middlesex. This assessment is required to inform a pre-application associated with minor changes to the main care home building, such as extensions and introduction of heated glass walkways, along with the development of the two derelict buildings and garage, repositioning of the driveway, creation of additional parking facilities and landscaping works, as shown in Figure 1 below.

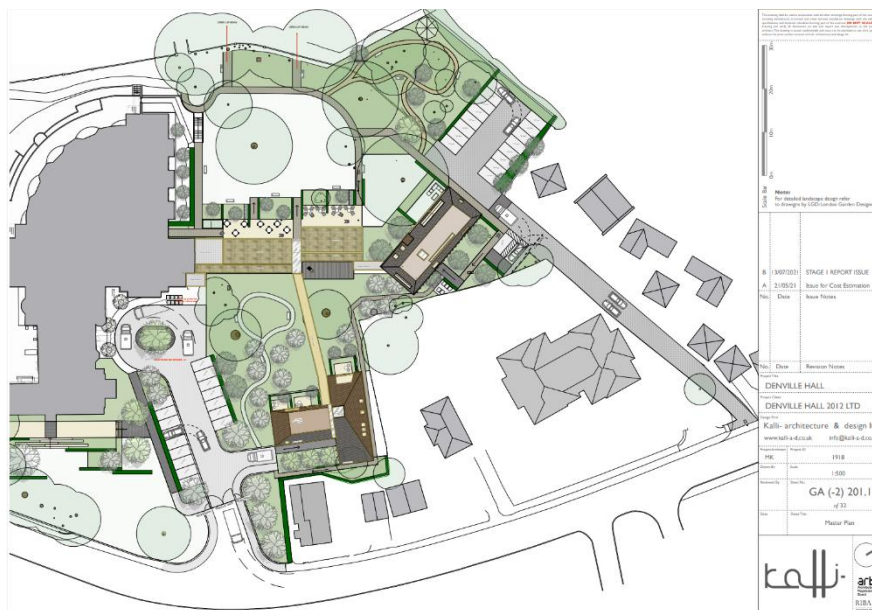


Figure 1. Masterplan (Source: Kalli Architecture and Design Ltd.)

During the Preliminary Roost Assessment of the site in June 2021, five buildings were identified within the site boundary. These include:

- The main care home (Building B1) which is considered to have high potential for roosting bats, with the older part of this building confirmed as a bat roost (bat droppings present).
- A small Plant Room (B2) which has negligible potential for roosting bats and will therefore not be referred to any further in this report.
- The derelict Garage (B3) which has moderate potential for roosting bats and no evidence of bats was recorded during the survey work in June 2021.
- The Bungalow (B4) which has been appointed high potential for roosting bats, with no evidence of bats found during the internal inspection of the loft.

- The Flats (B5) is considered to be of high potential for roosting bats and evidence of bats in the form of a small number of droppings and feeding remains was found during the internal inspection of the loft. This building is therefore a confirmed bat roost.

The proposals for the care home (B1) involves the addition of a single-storey extension to the east of the newer part and will therefore not affect any areas of value to roosting bats such as the roof slates, loft void, etc. Therefore, no impacts are anticipated and no further survey work was carried out. As such, Building B1 will no longer be referred to in this report.

As the Garage (B3) is of moderate potential to roosting bats, with the Bungalow (B4) and the Flats (B5) of high potential, nocturnal emergence and dawn re-entry bat surveys were carried out between July and August 2021, to establish the presence or likely absence of bat roosts within these buildings. Furthermore, an updated site visit was carried out in October 2022 to ensure that the condition of the buildings and roost status have not changed since the previous survey work and the survey data is still valid. This report details the results of the bat activity surveys, including a single dusk emergence and a dawn re-entry survey for the Garage and two dusk emergence and a single dawn re-entry survey for the Flats and Bungalow.

1.2 SITE DESCRIPTION

The application site is located to the west of Duck's Hill Road, in Northwood, Greater London. It is approximately 3.2 acres in size and centred at National Grid Reference TQ 08099 91342.

The site comprises a number of buildings, with Denville Hall in the southern extent of the application site being the largest one. Denville Hall care home was originally built in the 1850s and has been extended over time, most recently in the late 1990s. Three smaller derelict buildings are located in the northern extent of the site. The care home grounds support areas of managed amenity grassland and ornamental shrubs, along with a large number of trees scattered throughout the site.

The application site is situated within a semi-urban setting, surrounded by residential dwellings and their private gardens to the east, north and south. Grass and arable fields, along with wooded parcels are located to the west of the site. A parcel of woodland is also located immediately to the east of the site, beyond Duck's Hill Road.

Figure 2 shows the site location plan with Figure 3 showing the location of the site in the wider landscape. Figure 4 indicates the location of the buildings on site, buildings B1 to B5.



Figure 2. Site location plan



Figure 3. Location of the application site in the wider landscape (Source: Google maps)



Figure 4. Location of the buildings (B1 – B5) on site

2. METHODOLOGY

2.1 NOCTURNAL EMERGENCE AND DAWN RE-ENTRY SURVEYS

As the Garage on site has been assessed to hold moderate potential for roosting bats during the Preliminary Roost Assessment carried out in June 2021, in line with the Good Practice Guidelines (Collins, 2016), two bat surveys were carried out, consisting of a single nocturnal emergence and one dawn re-entry bat survey. Similarly, as the Flats and the Bungalow have been assessed to have high potential for roosting bats, in line with the Good Practice Guidelines (Collins, 2016), three bat surveys were carried out, consisting of two nocturnal emergence and a single dawn re-entry bat survey. The aim of these surveys was to determine whether bats are currently roosting within these buildings on site, the species roosting and the type of roost(s) present.

Nocturnal emergence bat surveys commenced 15 minutes prior to sunset and continued until 90 minutes after sunset. The dawn surveys commenced 90 minutes prior to sunrise and continued until 15 minutes after sunrise.

To facilitate the detection of bats and to aid in the determination of species of bat using the site, the surveys were conducted using electronic bat detectors (i.e. Echo Meter Touch 2 Pro). Computer analysis (i.e. Kaleidoscope software) of bat detector information collected was utilised to identify all species recorded on the site.

Due to the difficulty in detecting late emerging bats, a Sony FDR-AX33 camcorder with infrared recording capability, with two supplementary infrared illuminators were also used during each survey to assist in detecting late emerging bats. The camcorder footage was later analysed. The location of the infrared camcorder was changed during each survey to ensure a full coverage of the areas of the buildings to be affected by the proposals.

The surveys for the Garage were carried out by two members of staff. Similarly, the surveys for the Flats were undertaken by two ecologists. To ensure a full coverage of the Bungalow on site, three bat ecologists completed the surveys of this building. All surveys were led by Maral Miri, Principal Ecologist, MSc, MCIEEM, CEnv, Natural England Level 2 bat class licence holder and a holder of European Protected Species development licence for bats.

Drawings below show the location of the surveyors, ensuring a full coverage of the areas of the buildings with potential for roosting bats.



Figure 5: Location of the surveyors during the emergence and dawn re-entry bat surveys –
Bungalow



Figure 6: Location of the surveyors during the emergence and dawn re-entry bat surveys –
Flats



Figure 7: Location of the surveyors during the emergence and dawn re-entry bat surveys – Garage

3. SURVEY RESULTS

3.1 FLATS (B5) - FIRST EMERGENCE SURVEY

The first nocturnal emergence survey of the Flats was undertaken on 22 July 2021. The weather conditions recorded at the time of the survey are detailed in table 1 below.

Parameter	Conditions
Temperature	25°C
Cloud Cover (%)	0%
Precipitation	Dry
Wind Speed (Beaufort)	F1

Table 1: Weather conditions during the first nocturnal emergence survey

Sunset was at 21:04. No bats were recorded emerging from the Flats. In total, three species of bat, common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *P. pygmaeus* and brown long-eared bat *Plecotus auritus* were recorded during the survey. Overall, moderate levels of foraging and commuting bat activity was recorded during the survey. More details are provided below.

Common pipistrelle

At 21:32 (28 minutes after sunset), a common pipistrelle was observed commuting over B5 in a southerly direction. A social call of a common pipistrelle was registered at 21:33. Another common pipistrelle was recorded commuting over B5 in a southerly direction at 21:35. At 21:37, two common pipistrelle bats were observed foraging briefly around the tree canopies located along the south-western boundary of the rear garden. At 21:38, these two bats were recorded commuting from west to south-east, in the direction of the rear garden of B4 (the Bungalow), flying over the car parking area.

At 21:42 and 21:43, a brief foraging call of a common pipistrelle was heard only. A common pipistrelle was observed foraging above the garden of B5 and the front elevation at 21:45 and then flying in a southerly direction. At 21:47 and 21:51, foraging activity of a common pipistrelle was recorded along the western gable-end and southern elevation of B5 and the rear garden. At 21:54 and 21:58, commuting activity of a common pipistrelle was recorded from the garden of B5, towards the garden of B4 (the Bungalow) in the south-east.

At 22:00, a common pipistrelle was observed commuting in a westerly direction along the front elevation of B5. At 22:04, a common pipistrelle was heard briefly, with a common pipistrelle recorded foraging briefly along the north-western boundary of the carpark at 22:07. The last common pipistrelle call on site was heard at 22:13.

Soprano pipistrelle

At 21:41, a soprano pipistrelle was seen commuting from south-east (the rear garden of B4), in a north-westerly direction. At 21:44, another soprano pipistrelle was observed commuting from the direction of the rear garden of B4, towards the rear garden of B5. At 22:02, a soprano pipistrelle was heard briefly. Between 21:10 and 22:11, intermittent foraging call of a soprano pipistrelle was heard only. The last soprano pipistrelle call on site was heard at 22:16.

Brown long-eared bat

The first brown long-eared bat was recorded at 21:59 (55 minutes after sunset). This bat was observed commuting from south-east to north-west. At 22:12 and 22:18, a brown long-eared call was heard only. Two brown long-eared bats were observed at 22:33, commuting from east to west, flying along the southern/front elevation of B5.

3.2 FLATS (B5) - DAWN RE-ENTRY SURVEY

The dawn re-entry bat survey was undertaken on 8 August 2021. The weather conditions recorded at the time of the survey are detailed in Table 2.

Parameter	Conditions
Temperature	14°C
Cloud Cover (%)	90%
Precipitation	Dry
Wind Speed (Beaufort)	F1 – F2

Table 2: Weather conditions during dawn re-entry survey

Sunrise was at 05:35. Three species of bat, common and soprano pipistrelle and brown long-eared bats were recorded during the survey. No bats were recorded re-entering the building. Overall, low levels of bat activity was recorded throughout the survey period. More details are provided below.

Common pipistrelle

At 04:06, the first common pipistrelle bat call was logged (heard only). Then, between 04:14 and 05:06, intermittent foraging calls of common pipistrelle were recorded (no visual contact was made). At 04:45, a common pipistrelle was observed commuting in a north-easterly direction. Another common pipistrelle was observed commuting from west to east at 04:50.

Soprano pipistrelle

Soprano pipistrelle calls were heard at 04:08, 04:45 and 05:18.

Brown long-eared bat

A brown long-eared bat call was logged at 04:29 and 04:46. At 04:57, a bat with no echolocation (likely to be a brown long-eared) was recorded commuting along the front elevation of B5 in an easterly direction.

3.3 FLATS (B5) - SECOND EMERGENCE SURVEY

The second nocturnal emergence survey of the Flats was undertaken on 17 August 2021. The weather conditions recorded at the time of the survey are detailed in table 3 below.

Parameter	Conditions
Temperature	17°C
Cloud Cover (%)	100%
Precipitation	Dry
Wind Speed (Beaufort)	F1

Table 3: Weather conditions during the second nocturnal emergence survey

Sunset was at 20:20. No bats were recorded emerging from the Flats. In total, three species of bat, common and soprano pipistrelle and brown long-eared bat were recorded during the survey. Overall, moderate levels of foraging and commuting bat activity was recorded during the survey. More details are provided below.

Common pipistrelle

The first common pipistrelle call was heard at 20:29 (9 minutes after sunset). At 20:36, a common pipistrelle was observed commuting from the residential units in the north, towards the south of the site, flying over the roof of B5. From 20:38 to 20:42, a single common pipistrelle was seen foraging above the tree canopies located around B3, which is located to the south-east of B5. At 20:49, a common pipistrelle was recorded flying over the eastern section of B5. At 20:52, a brief common pipistrelle call was heard only.

A common pipistrelle was seen foraging along the western gable of B5 and the houses located outside the northern boundary of the site at 20:56. Between 20:59 and 21:02, foraging calls of a common pipistrelle bat was heard only. Between 21:04 and 21:07, a common pipistrelle was observed foraging briefly along the rear elevation of B5 and over the roof. At 21:09, a common pipistrelle was seen commuting from north, in a southerly direction. At 21:13 and 21:17, a common pipistrelle was recorded foraging over the garden of B5. Other common pipistrelle calls were recorded at 21:14 and 21:21.

Soprano pipistrelle

At 20:50 and 20:55, a soprano pipistrelle was observed foraging above the garden area, to the front of B5. Between 21:10 and 21:12, a soprano pipistrelle was seen foraging around B5.

Brown long-eared bat

At 20:55 (35 minutes after sunset), a brown long-eared bat call was registered. No visual contact was made. However, considering the time of registration, it is likely that there is a roost nearby. At 21:20, another brown long-eared bat call was registered.

3.4 GARAGE (B3) - DAWN RE-ENTRY SURVEY

The dawn re-entry bat survey was undertaken on 1 August 2021. The weather conditions recorded at the time of the survey are detailed in Table 7.

Parameter	Conditions
Temperature	15°C (start) - 14°C (end)
Cloud Cover (%)	0% - 80%
Precipitation	Dry
Wind Speed (Beaufort)	F0 – F1

Table 7: Weather conditions during dawn re-entry survey

Sunrise was at 05:23. Two species of bat, common and soprano pipistrelle were recorded during the survey. No bats were recorded re-entering the Garage. Overall, very low levels of bat activity was recorded throughout the survey period. More details are provided below.

Common pipistrelle

Distant and brief calls of a foraging common pipistrelle was recorded at 04:21, 04:37 and 05:01.

Soprano pipistrelle

A soprano pipistrelle call was logged at 04:46 (no visual contact was made).

3.5 GARAGE (B3) - NOCTURNAL EMERGENCE SURVEY

The nocturnal emergence survey of the Garage was carried out on 12 August 2021. The weather conditions recorded at the time of the survey are detailed in table 5

Parameter	Conditions
Temperature	19°C (start) - 18°C (end)
Cloud Cover (%)	0%
Precipitation	Dry
Wind Speed (Beaufort)	F0

Table 5: Weather conditions during the emergence survey

Sunset was at 20:30. No bats were recorded emerging from the Garage. In total, three species of bat, common and soprano pipistrelle and noctule *Nyctalus noctula* were recorded during the survey. Overall, low levels of foraging bat activity was recorded during the survey. More details are provided below.

Common pipistrelle

The first common pipistrelle activity was recorded at 20:55 (25 minutes after sunset), when a single bat was observed foraging above the tree canopies in the north-west of the site. At 21:00 and 21:02, faint and distant calls of a common pipistrelle was logged, followed by intermittent foraging activity from 21:05 until 21:10 (no visual contact was made). Between 21:16 and 21:21, intermittent foraging activity of a common pipistrelle was also recorded, likely to be associated with the trees to the north of the Garage. Other common pipistrelle calls were recorded at 21:26 and 21:30.

Soprano pipistrelle

A distant and faint call belonging to a soprano pipistrelle was recorded at 20:51 (21 minutes after sunset). At 21:12, a soprano pipistrelle was observed commuting from north, towards the grass field located outside the western boundary of the site. Another soprano pipistrelle call was logged at 21:23.

Noctule

Noctule calls were logged at 20:52 and 21:08.

3.6 BUNGALOW (B4) - FIRST EMERGENCE SURVEY

The first nocturnal emergence survey of the Bungalow was undertaken on 15 July 2021. The weather conditions recorded at the time of the survey are detailed in table 6.

Parameter	Conditions
Temperature	18°C (start) - 16°C (end)
Cloud Cover (%)	0%
Precipitation	Dry
Wind Speed (Beaufort)	F1

Table 6: Weather conditions during the first nocturnal emergence survey

Sunset was at 21:13. No bats were recorded emerging from the Bungalow. In total, two species of bat, common and soprano pipistrelle were recorded during the survey. Overall, moderate levels of foraging and commuting bat activity was recorded during the survey. More details are provided below.

Common pipistrelle

The first bat activity on site was observed at 21:26 (13 minutes after sunset). This belonged to a common pipistrelle bat commuting from west to east, along the southern boundary of the garden of B4. Between 21:27 and 21:31, continuous foraging activity of a common pipistrelle, likely to be the same individual, was observed along the western treeline.

At 21:38, a common pipistrelle was seen commuting in a westerly direction over the roof of B4. Between 21:41 and 21:51, two common pipistrelle bats were recorded foraging constantly along the western treeline and over the garden of B4. At 21:54, a common pipistrelle was observed foraging briefly over the garden of B4. Between 21:57 and 22:01, a common pipistrelle was recorded foraging intermittently around the tree canopies in the south-eastern corner of the garden. A brief and faint common pipistrelle call was logged at 22:06 (no visual contact made). Other common pipistrelle calls were recorded at 22:14 and 22:18, with the last call recorded at 22:19.

Soprano pipistrelle

At 21:30, a soprano pipistrelle joined the common pipistrelle foraging along the western treeline. From 21:33 until 21:35, intermittent foraging calls of a soprano pipistrelle was heard only.

3.7 BUNGALOW (B4) - DAWN RE-ENTRY SURVEY

The dawn re-entry bat survey was undertaken on 1 August 2021. The weather conditions recorded at the time of the survey are detailed in Table 7.

Parameter	Conditions
Temperature	15°C (start) - 14°C (end)
Cloud Cover (%)	0% - 80%
Precipitation	Dry
Wind Speed (Beaufort)	F0 – F1

Table 7: Weather conditions during dawn re-entry survey

Sunrise was at 05:23. Three species of bat, common and soprano pipistrelle and brown long-eared bats were recorded during the survey. No bats were recorded re-entering the building. Overall, low levels of bat activity was recorded throughout the survey period. More details are provided below.

Common pipistrelle

Brief and faint calls (potentially offsite) belonging to a common pipistrelle were recorded at 04:05, 04:07, 04:27, 04:36, 04:37, 04:46 and 04:50. At 04:52, a common pipistrelle bat was observed commuting from west, flying in an easterly direction towards Ducks' Hill Road and the woodland offsite. The last common pipistrelle call on site was recorded at 04:55 (28 minutes before sunrise).

Soprano pipistrelle

At 04:08 and 04:15, brief and faint soprano pipistrelle calls were recorded (no visual contact was made).

Brown long-eared bat

At 04:06, a brown long-eared bat call was logged (no visual contact was made).

3.8 BUNGALOW (B4) - SECOND EMERGENCE SURVEY

The second nocturnal emergence survey of the Bungalow was undertaken on 17 August 2021. The weather conditions recorded at the time of the survey are detailed in table 8 below.

Parameter	Conditions
Temperature	17°C
Cloud Cover (%)	100%
Precipitation	Dry
Wind Speed (Beaufort)	F1

Table 8: Weather conditions during the second nocturnal emergence survey

Sunset was at 20:20. No bats were recorded emerging from the Bungalow. In total, two species of bat, common and soprano pipistrelle were recorded during the survey. Overall, moderate levels of foraging and commuting bat activity was recorded during the survey. More details are provided below.

Common and Soprano pipistrelle

The first bat activity was recorded at 21:41 (21 minutes after sunset) and belonged to a common pipistrelle foraging along the rear and front elevations of B4, over the roof, over the garden and around the tree canopies along the eastern boundary of the garden. This foraging activity continued until 21:03; however, at 20:48, a soprano pipistrelle joined the common pipistrelle and they both foraged on site until 20:55. At 21:10 and 21:12, brief foraging activity of a soprano pipistrelle bat was recorded on site.

3.9 UPDATED SURVEY WORK

An updated site visit was carried out on 14 October 2022. This constituted an external and internal inspection of all the buildings on site to be affected by the proposals.

The external inspection confirmed that the condition of the buildings had remained similar to that previously recorded and the Garage still offered moderate potential with the Flats and Bungalow offering high potential for roosting bats, with no significant further deterioration in the condition of the buildings.

The internal inspection of all three structures failed to record any new evidence of roosting bats. Particularly in the case of the Flats, where no fresh bat droppings or feeding remains were present.

Therefore, it can be concluded that the condition of the buildings on site and roost status have not changed since the previous survey work and the survey data is still valid.

4. DISCUSSION AND CONCLUSIONS

4.1 SUMMARY OF PROPOSALS

The proposals include changes to the main car home (B1), provision of additional car parking areas, demolition of the Garage (B3), Bungalow (B4) and the Flats (B5) and their replacement with assisted living units, along with landscaping such as creation of woodland walks for the residents, inclusion of water features and additional tree and shrub planting.

4.2 SUMMARY OF NOCTURNAL EMERGENCE AND DAWN RE-ENTRY SURVEYS

During the nocturnal emergence and dawn re-entry bat surveys of B3, B4 and B5 between July and August 2021, no bats were recorded emerging or re-entering these buildings on site.

4.3 CONCLUSIONS

Following the suite of survey work undertaken on site, including external and internal building inspection as part of the Preliminary Roost Assessment in June 2021 and dusk emergence and dawn re-entry surveys between July and August 2021, it can be confirmed that the Bungalow (B4) and Garage (B3) do not currently contain a bat roost. Whilst no current roosting activity was recorded in relation to the Flats (B5), as evidence of roosting bats in the form of droppings and feeding remains was previously confirmed, this building is likely to support a historical or occasional day roost belonging to an individual or a small number of brown long-eared bats. The species of bat will however be accurately determined through DNA analysis of the droppings collected.

4.4 POTENTIAL IMPACTS ON BATS

All bat species are UK and European protected species and are capable of being material consideration in the planning process. This makes it an offence to:

- deliberately (or recklessly) capture, injure or kill a bat;
- deliberately (or recklessly) disturb a bat; and,
- damage or destroy a bat roost.

As the surveys to date have confirmed the absence of roosting bats within B3 and B4, the proposals will not result in any impact on bats. As the presence of a historical or occasional day roost belonging to an individual or a small number of brown long-eared bats (to be confirmed through DNA analysis) has been confirmed, if unmitigated, the proposals to demolish this building will result in the potential killing/injury of bats and permanent loss of a roosting site

5. RECOMMENDATIONS

5.1 Overview

As a bat roost has been identified in B5, no works to this building will be allowed in the absence of a Bat Mitigation Class Licence (BMCL) or a European Protected Species (EPS) licence from Natural England. Therefore, prior to any works being undertaken which are likely to result in a breach of the legislation, a development licence must be obtained from Natural England. Prior to a licence being issued, planning permission must be granted and relevant conditions relating to protected species must be discharged. The below summarises the mitigation measures required to be implemented to allow a BMCL or an EPS licence being obtained.

5.2 Mitigation

The surveys undertaken on site between July and August 2021 identified the presence of a historical or occasional day roost of an individual or a small number of brown long-eared bats (to be confirmed via DNA analysis) within B5 (the Flats). The conservation significance of a day roost is of low value for common species (brown long-eared bat is common locally and nationally), and the impact on bats will therefore be low in the absence of mitigation. The below mitigation strategy for the proposed works will ensure that bats are protected during the works and that roosting sites are available at all times.

- Prior to any works commencing on site, three bat boxes will be erected on a suitable tree on site. This will include Improved Crevice Bat Box or equivalent. The bat boxes will be installed on suitably mature trees. The bat boxes will provide roosting locations suitable for bats and will have a life expectancy of 25 years without any maintenance requirements.
- According to Natural England's Bat Mitigation Guidelines (2004), there are no conditions relating to the timing of works on known roosts when they are utilised by an individual or low number of common bats for summer roosting. However, as the presence of hibernating bats could not be ruled out, the most effective method is to carry out the works between March and November.
- A 'toolbox' talk will be held with the works team before the works is undertaken to ensure that the contractors are aware of the bat issues associated with the building on site. This will run through the exclusion work process as detailed below and include the adoption of appropriate methodologies to remove the roof tiles and other suitable features for bats, to ensure no harm to bats.
- The works will then be undertaken by the careful removal of the roof tiles, hanging tiles, soffits and lead flashing under the supervision of a licensed bat worker or their accredited agents, ensuring that no bats are harmed during the works.

- If any bats are discovered during the supervision works, the named ecologist or accredited agent on the licence granted will relocate the bats to the bat box installed on trees.
- To mitigate for the loss of a roosting site within the Flats, the new building will have three roosting features incorporated into its design. This will be in the form of bat access tiles within the new roof as shown in Figure 6 or bat tubes in the gable-ends as shown in Figure 7.



Figure 6. Example of bat access tile



Figure 7. Example of Bat Tube

- Where bat mitigation has been incorporated into the roof, the use of breathable roof membrane will not be allowed.
- The installation of the mitigation features will be supervised and checked by the licence holder or their accredited agents.
- English Nature Bat Mitigation Guidelines (2004) state that post-development monitoring surveys are not required for day roosts utilised by low numbers of common species. The development is small scale and not considered to adversely impact upon the overall conservation status of local bat populations. As such no monitoring surveys will be undertaken.

The mitigation measures detailed above will ensure that bats can be maintained on site at a favourable conservation status.

The survey data obtained for B3 and B4 are valid for 12 months from the date of the last survey. If development works to the surveyed building have not commenced within this timeframe, it may be necessary to update the survey effort to establish if bats have colonised the buildings in the interim.

As a precautionary measure, it is recommended that the works to B3 and B4 are carried out under the supervision of an experienced and licenced bat ecologist (to be secured via a Planning Condition). This will entail the soft stripping of the roof tiles and any other potential roost features under supervision. In the unlikely event that a bat is found during the demolition, all works in that area must immediately cease and Natural England contacted.

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