

The proposed East Havering Data Centre – a threat to local biodiversity.

The **London Plan** (217) states that: to meet Policy 7.19, developers must “*wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity*”.

Note that the word ‘protection’ comes first in this quote. We would argue, first, that the site has a significant variety of wildlife, including many species that are precisely *in need of protection*, either because of their rarity, or the fact that they are in decline.

Second, we are convinced that constructing an ‘ecology park’, right alongside the data centre buildings, is not an adequate replacement for wildlife that will be damaged or driven away as a result of the massive amount of construction involved in building the data centre. It will take up to ten years to build. There will be 12-15 warehouse-style buildings, each 21 metres tall, plus up to 5 metres for ‘flues’ - covering an area of 472 acres (191 hectares). Figures from SLR screening & scoping report July 2023.

The point is that construction work on a site this size will involve: laying concrete foundations to provide nearly 400,000 square metres of floorspace, then constructing the buildings to hold the masses of computers, batteries, and back-up machinery, using a huge number of lorries travelling to and from the site, creating noise, dust and pollution for up to 10 years. **This can only be highly destructive of existing wildlife.**

The whole site is Green Belt land. It is not the case that the land to be built on is bare or poor. Crops have been and still are growing, and there are **many species of plants, insects and animals on or near the site.** (See further below). There is, therefore, an established ecosystem. A basic point about ecology (not understood by most developers!) is that **ecosystems grow gradually over many, many years, and there is a continual, vital interaction between all the organisms in the ecosystem.** To destroy one part of an ecosystem risks destroying the whole of it.

We have used information provided by GiGL (Greenspace in Greater London) to make our case concerning biodiversity. GiGL gives very detailed information on all forms of wildlife, and is used by researchers and wildlife organisations to keep up-to-date and detailed records of wildlife in London.

When consulted about a planning issue, like this one, GiGL draws up a **map of the affected land, up to 2km from the centre of the site, and records all the wildlife found in that area.** This process recognises that the effects of construction work go beyond the boundaries of the site itself. The species of plant, insect, invertebrate, moth, butterfly, and mammals that have been seen on the site are noted, along with a designation indicating how **rare or significant** they are.

The different **habitats** are also described, and in this area, there are: sites of Metropolitan or Borough Importance, Sites of Local Importance, and one Invertebrate Importance Area (IIA). There is **a Local Nature Reserve at Cranham Marsh, and there are 12 Sites of Interest for Nature Conservation (SINCs) within the 2km area. (See below).**

Protected species and species of conservation concern, from the following categories, have been found on or near the site:

- Internationally or nationally protected species
- London Priority Species
- Red Data List species
- Species of Conservation Concern in London

SUMMARY of species identified in the area, **all of which come under at least one of the above categories:**

Plants:

12 flowering plants

NB there is a separate GiGL listing of **some 200 plants classified as axiophytes** (Greek for 'worthy plant'). These are plant species which are indicators of habitats of interest for nature conservation. They are not necessarily rare, but may be very common in habitats of high value. The greater the number of axiophytes present, the greater the botanical value of a site.

Invertebrates:

4 species (including bugs, beetles and dragonflies).

Butterflies and moths:

9 species of butterflies, and 10 of moths, all of London or Local Significance

Mammals:

The following are all either endangered, vulnerable or at risk:

water vole, hedgehog, harvest mouse, hazel dormouse, 5 species of bat.

Birds:

The area is **very rich in birdlife**. Around 60 different species of birds are listed, and all are significant (note that some species appear in more than one category, so the total below is greater than 60):

45 are on the Red Data List,

29 on the list of London Species of Conservation Concern, and 27 London Priority Species,

19 covered by International Legislation, viz. the Birds Directive Annex

23 covered by the Wildlife and Countryside Act

19 counted as Nationally Rare.

SITES OF INTEREST FOR NATURE CONSERVATION (SINCs), a summary:

Cranham Marsh: Marshland is **rare** in London, and this is a fine combination of wet ancient woodland, wet meadow and marsh and an **important habitat for marsh-dwelling species**. There are several regional and locally uncommon plants. The invertebrate fauna includes the **nationally scarce bee *Macropis europaea***. The site is also important for **specially protected reptiles and the great crested newt**. Cranham Marsh also includes a Local Nature Reserve.

North Ockendon Pit: this was designated a Site of (Havering) Borough Importance Grade II in 2003. It is 'moderately rich in plant species.' It has an **invertebrate assemblage of national importance, including several rare bees, wasps and ants**, and is part of a 'chain' of similar sites in the wider area.

It has **significant populations of reptiles, and it is a valuable undisturbed breeding ground for a wide variety of birds -including lapwing (red-listed) and reed bunting (amber-listed)** - in an area dominated by arable farming.

Fields South of Cranham Marsh: these are fields with hedges and drains, where the hedges have **diverse species**. Wet areas may contain **voles**. Rotting wood is likely to have invertebrates, and when leguminous crops are planted in these fields, bean broomrape (*Orobanche crenata*) appears in large numbers. **This is the only place in the UK where this unusual alien plant is naturalised.**

Fairplay Farm: a farm with fine old hedges around, supporting traditional farmland birds and mammals, around fields with **rare arable weeds**. A series of arable fields and hedges with a good variety of associated wildlife. The fields contain large amounts of loose silky-bent (*Apera spica-venti*), a **nationally scarce grass**. Arable fauna is also well represented and includes **skylark**, a strong population of **brown hare and harvest mouse, the latter rare in London**. A variety of common butterflies are present.

There is an unusually large number of ancient oak (*Quercus robur*) pollards that include fissures and dead limbs, and therefore **likely to be of value for bats, fungi, hole nesting birds and invertebrates**.

Clay Tye Wood: this is the **only rookery known to remain in Greater London** and the largest in Thames-side Essex. A sizeable wood, probably ancient, with **London's only known nesting colony of rooks, with around 80 nests**.

Cranham Hall (Shaws and Pasture): an area of traditional countryside with pasture, rich hedges, a pond and two small woods. **Ancient woodland**. A mosaic of habitats which are of value to a variety of birds and invertebrates, and possibly amphibians, as well as having botanical interest.

Puddle Dock Angling Centre: a variety of wetland habitats, with a population of the **rare water vole**. The grounds of this angling centre contain a good variety of wildlife habitats. The open water has an abundance of young fish, which attracts **herons and kingfishers**. Some of the ditches are used by water voles.

The main drainage feature running south from Warley Street is heavily shaded by blackthorn (*Prunus spinosa*) scrub that is likely to be of value for nesting birds. A line of very old oaks with blackthorn is of potential interest for invertebrates and **bats**. Warley Street drain runs north from the angling centre and there are broad margins of coarse grassland with areas of scrub and tall herbs. This area may support water **voles**.

Thames Chase Community Forest Centre: the site includes several **ancient hedges**, some with old hollow pollards and one containing a wild service-tree (*Sorbus torminalis*).

Boundaries also comprise streams with treelines of oak (*Quercus robur*) and various willows (*Salix* spp.), also areas dominated by great reedmace (*Typha latifolia*) and reed canary-grass (*Phalaris arundinacea*), and with quite diverse wet tall herb. **Water voles are present**.

There are two recently-created ponds. The second has well-developed aquatic and emergent vegetation including a good stand of lesser reedmace (*Typha angustifolia*). A water crowfoot, possibly *Ranunculus trichophyllus*, is also well established.

Upminster Sewage Works grass beds: an interesting mix of wetland habitats, home to birds and the **rare water vole**. The site forms a significant wetland area in the north of the borough **of value to birds, water vole, amphibians and invertebrates**.

Hall Farm Moat, St Mary Magdelene Churchyard: there are three ponds at Hall Farm, which are relics of an old moat, and the adjacent churchyard and paddock contain **flower-rich grassland**. Varied habitats. The banks of one pond are sandy and in places contain the burrows of **solitary wasps**, with similar activity occurring near the pond edge in the paddock.

The churchyard and a nearby small horse-grazed paddock are notable for the occurrence of relatively **species-rich grassland**.

The paddock has abundant wild flowers, with smaller amounts of musk mallow (*Malva moschata*) and bugloss (*Anchusa arvensis*), the **latter very rare** in London.

St Cedd's Well, a grotto located in a separate fenced area to the south-west, is housed in a small building. This and the church are both **potential bat roosts**.

Stubbers Outdoor Pursuit Centre: an area of former gravel pits, with **a good range of wetland and grassland habitats and some fine old trees**. Ponds. Veteran trees.

Supports breeding **skylarks and meadow pipits**. Extensive planting of native broadleaves on the slopes of landscaped mounds will be of future benefit to other birds. A raised area to the east supports dry, acid grassland of common bent (*Agrostis capillaris*) and red fescue (*Festuca rubra*), with common centaury (*Centaureum erythraea*) and grey sedge (*Carex divulsa*), both **scarce in London**. The lakes are important for wintering wildfowl, and **tufted duck, mute swan and little grebe** breed. Common dragonflies occur in the summer. The ponds support a variable amount of emergent vegetation and may be of interest for **amphibians**.

Much of the southern part of the site retains its original boundary of decaying oaks with much dead wood and a range of shrubs, including wild service-tree. There is a large and important **bat roost** on the site, and it is also an **important foraging area for bats** in this part of the borough.

Ockendon Railside: the railway line from Upminster to Tilbury includes a very rich wooded cutting on either side of the M25 with **ancient woodland**. Havering's rail-sides form a network of valuable undisturbed habitats, acting as corridors to facilitate the movement of wildlife around the borough. There are good areas of habitat along all the borough's railways, with cuttings and embankments generally supporting the widest and best habitats.