

For and on behalf of David Haime, CIAT

The Red House, Wrangling Lane

Biodiversity Enhancement Plan



DC Development Consultants
Driving Sustainable Development

January 2026

26-363-DC-BEP-01-XX-XX-R1





Document Revision Details

Item	Information
Report title	The Red House, Wrangling Lane, Biodiversity Enhancement Plan
Report reference	26-363-DC-BEP-01-XX-XX-R1
Revision number	R1
Issue Date	21 st January 2026
Author	Thomas Magee BSc (Hons) MCIWEM FGS MCIWM
Checked by	Laura Hobbs CEnv MCIEEM MRes BSc
Client	David Haime, CIAT
Consultant	DC Development Consultants Henge Barn, Pury Hill Business Park, Alderton Road, Towcester, NN12 7LS

Document Revision Status

Issue	Date	Comments
R1	21/01/26	First issue for Client review.



Important note about the report:

The sole purpose of this report and the associated services performed by D & C Consultancy Ltd. (trading as “*DC Development Consultants*”; referred to as DC hereafter) is to develop and present the Ecological Enhancement Plan in accordance with the scope of services set out in the Contract between DC and the Client. That scope of services, as described in this report, has been developed with the Client.

In preparing this report, DC has relied upon, and presumed accurate, any information (or confirmation of the absence thereof) provided by the Client. Except as otherwise stated in the report, DC has not attempted to verify the accuracy or completeness of any such information. If the information is subsequently determined to be false, inaccurate or incomplete then it is possible that our observations and conclusions as expressed in this report may change.

DC have derived the data and assessments in this report from information sourced from the Client, produced in house and/or available in the public domain at the time of reporting. The passage of time, changes to either design or construction details by either the Client, Designer or Contractor, changes in the Clients requirements, manifestation of latent conditions or impacts of future events may require further examination of the project and subsequent re- evaluation of the data, findings, observations and conclusions expressed in this report. DC has prepared this report in accordance with the usual care and thoroughness of the consulting profession, for the sole purpose described above and by reference to applicable standards, guidelines, procedures and practices at the date of issue of this report. For the reasons outlined above however, no other warranty or guarantee, whether expressed or implied, is made as to the data, observations and findings expressed in this report, to the extent permitted by law.

This report should be read in full and no excerpts are to be taken as representative of the findings. No responsibility is accepted by DC for use of any part of this report in any other context.

The report is based on the available information provided to date and subject to agreement with the relevant Regulators. This report has been prepared on behalf of, and for the exclusive use of the Client, and is subject to, and issued in accordance with, the provisions of the contract between DC and the Client.

DC accepts no liability or responsibility whatsoever for, or in respect of, any use of, or reliance upon, this report by any Third Party. A fee may be levied against such arrangements.



Contents

1.0	Introduction.....	1
1.1	Preliminary Information.....	1
1.2	Report Objectives.....	2
1.3	Development Works.....	2
1.4	Confidentiality	2
2.0	Site Information.....	3
2.1	Geographical Context	3
2.2	Ecological Context	4
3.0	Legislative Context.....	6
4.0	Ecological Enhancement	7
4.1	Avian Enhancements	7
4.2	Bat Mitigation and Enhancement.....	10
4.3	Invertebrate Enhancements	11
5.0	Conclusion.....	12
	APPENDIX A – Appeal Notice	
	APPENDIX B – Drawings	
	APPENDIX C – Bat Survey Report	



1.0 Introduction

1.1 Preliminary Information

DC Development Consultants have been commissioned by David Haime, CIAT, to produce the Biodiversity Enhancement Plan for the front, rear and side extensions and alteration works to the Red House, Wrangling Lane, Luddesdown, Kent, DA13 0XF.

This Biodiversity Enhancement Plan has been prepared in relation to Conditions 3 and 4 of the Inspectors decision, as set out in the attached schedule of conditions. A copy of the appeal decision is provided in Appendix A.

Condition 3 requires details of how the development will enhance biodiversity to be submitted to and approved by the Local Planning Authority, with the approved measures to be implemented and thereafter retained.

Condition 4 requires the development to be carried out in accordance with Section 4 of the submitted Bat Scoping Survey prepared by Crossman Associates (September 2024; provided in Appendix C), including precautionary measures for roosting bats during construction and the provision of a single bat box within the garden prior to substantial completion of the development.

This Biodiversity Enhancement Plan has been prepared with reference to the National Planning Policy Framework (NPPF), BS 42020:2013, the Environment Act 2021, and relevant development plan policies relating to biodiversity and the natural environment, including Policy CS12 of the Gravesham Local Plan Core Strategy. The document has also been informed by the findings and recommendations of the Bat Scoping Survey undertaken for the site.

The applicability of mandatory Biodiversity Net Gain (BNG) requirements under Schedule 7A of the Environment Act 2021 has been considered. Mandatory BNG for non-exempt development came into force in February 2024 and requires a minimum 10% net gain in biodiversity value to be demonstrated using the Statutory Biodiversity Metric.

Based on the approved plans and site context, the development is considered to be exempt from mandatory BNG requirements on the basis that it constitutes de minimis development, as defined under the Environment Act 2021 and associated Defra and Natural England guidance. The proposals comprise extensions and alterations to an existing dwelling within an established residential curtilage, together with minor domestic garden works. The site consists of existing built form, hardstanding and areas of managed amenity lawn with scattered trees and shrubs of limited intrinsic ecological value. No priority habitats, hedgerows or semi-natural habitats will be lost or degraded, and the scale of habitat change falls below the threshold intended to trigger mandatory BNG.

Notwithstanding this exemption, the Biodiversity Enhancement Plan has been informed by current Defra and Natural England guidance on Biodiversity Net Gain and has regard to opportunities for



proportionate ecological enhancement within the site. The measures proposed are appropriate to the scale and nature of the development and are intended to secure a modest but meaningful net benefit for biodiversity, in accordance with local policy objectives and national planning guidance.

1.2 Report Objectives

The objectives of this report are to:

- Address the planning condition detailed in Section 1.1 and ensure suitable actions are developed throughout the report, facilitating the discharge of the aforementioned conditions;
- Identify and describe proportionate biodiversity enhancements to be delivered as part of the development;
- Ensure the mitigation measures detailed within the bat survey report are adhered to; and,
- Ensure that the proposed development incorporates measures to enhance biodiversity value and deliver long term ecological benefit, with appropriate provisions for implementation and retention.

1.3 Development Works

The scope of the development will comprise the following works:

- Establishment of temporary construction arrangements within the approved development footprint, utilising existing areas of hardstanding and the existing driveway where practicable;
- Limited site preparation works within the application boundary, including localised clearance and ground preparation within the domestic curtilage to facilitate the approved development;
- Construction of the approved front, side and rear extensions together with first-floor alterations, in accordance with the permitted drawings;
- Formation of associated domestic external works as shown on the approved plans, including alterations to the driveway, patio areas, raised sun terrace and retaining wall;
- Installation of external finishes, doors and windows in accordance with the approved materials and elevations;
- Completion of internal alterations and fit-out works associated with the approved development; and,
- Removal of temporary construction arrangements and reinstatement of any temporarily disturbed areas within the site following completion of works.

1.4 Confidentiality

D & C Consultancy Ltd. (trading as “*DC Development Consultants*”) have prepared this report solely for the use of the Client and those parties with whom a warranty agreement has been executed, or with whom an assignment has been agreed. Should any Third Party wish to use or rely upon the contents

of the report, written approval must be sought from D & C Consultancy; a fee may be levied against such approval.

2.0 Site Information

2.1 Geographical Context

The site is approximately rectangular, centred on national grid reference TQ 66949 63914 and encompasses an area of circa 3,580m². Figure 2.1 below shows the existing site area. The full drawing is presented in Appendix B.

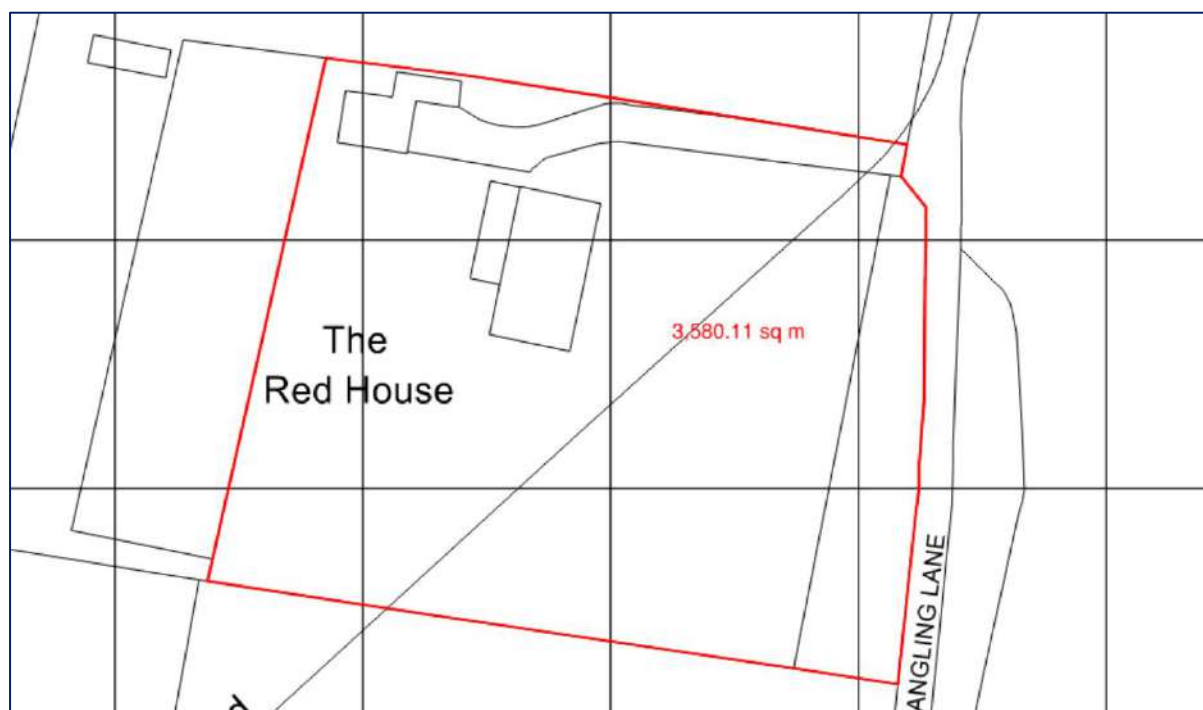


Figure 2.1 – existing site area.

The development footprint is situated within the existing domestic plot and includes areas of garden, driveway and previously modified ground associated with the residential use of the site. The land within the application area is private residential land and does not include any public access routes. Existing built form within the site includes the main dwelling, domestic outbuildings and areas of hardstanding, with the remainder comprising garden land laid predominantly to lawn with scattered trees and shrubs typical of large rural residential plots.

The ground across the site is generally level to gently sloping, with minor changes in level accommodated by garden landscaping and retaining features. No watercourses, ponds or surface water bodies are present within the application site, and none are shown on the approved plans or indicated on publicly available mapping.

A review of recent aerial imagery indicates the presence of mature vegetation, tree belts and boundary planting surrounding the wider plot, particularly along site boundaries and between

neighbouring land parcels. These features are located either at the periphery of the residential curtilage or beyond the application boundary and will be retained in situ. No removal or alteration of boundary features is proposed as part of the development.

Immediately adjacent to the site are other residential properties set within similarly sized plots, together with associated gardens and boundary planting. To the wider east and west, the landscape transitions into open countryside characterised by agricultural land, hedgerows and woodland blocks. To the north, Wrangling Lane provides vehicular access to the site and connects the property to Luddesdown and the surrounding rural road network.

The surrounding landscape is rural in character, comprising a mix of detached dwellings, agricultural land and woodland, with development generally dispersed and low in density. Built form within the locality is largely screened by vegetation and set within generous plots, contributing to the semi-rural character of the area.

Access to the site is taken from the existing private driveway connecting directly to Wrangling Lane. There are no additional access tracks or internal estate roads within the site. Views of the site are filtered by existing buildings, garden planting and surrounding vegetation, with wider views across the landscape available from parts of the site due to its open rural setting.

Relevant drawings are presented in Appendix B, including location and proposed development plans. For reference, the site in context is presented in Figure 2.2 below.



Figure 2.2 – Site in context (red).

2.2 Ecological Context

The site is located within a wider rural landscape that supports a range of internationally, nationally and locally important ecological designations. These include international designations in the form of Special Areas of Conservation (SACs) and statutory national designations including Sites of Special

Scientific Interest (SSSIs), and a nationally designated landscape in the form of the Kent Downs Area of Outstanding Natural Beauty (AONB). Collectively, these designations form part of a wider ecological network recognised through national planning policy, local planning policy and the Kent and Medway Local Nature Recovery Strategy (LNRS).

Land approximately 100 m to the east of the application site includes the North Downs Woodland Special Area of Conservation (SAC), which is designated for Annex I habitats associated with ancient and semi-natural woodland communities on chalk, supporting specialist flora and fauna of international importance. In addition, land approximately 0.32 km to the west includes the Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI), designated for its chalk grassland, woodland and associated species assemblages. These sites form part of the wider North Downs ecological resource and contribute to landscape-scale biodiversity value and ecological connectivity.

The surrounding countryside supports habitats relevant to a range of priority species identified within Countryside Stewardship targeting and the LNRS, including farmland and ground-nesting birds such as corn bunting, lapwing, curlew, redshank and snipe. These species are associated with open agricultural landscapes, chalk downland, river valleys and wet grassland systems that function as upland or semi-upland breeding areas during the breeding season, providing suitable nesting, feeding and low-disturbance conditions at a landscape scale. Domestic gardens and developed residential curtilages do not constitute functional breeding or supporting habitat for these species.

The wider landscape also supports habitats of relevance to farmland birds, woodland species, plants and invertebrates, and contributes to a connected ecological network across the North Downs. Several additional SSSIs are present further afield within the surrounding landscape, contributing cumulatively to ecological resilience and biodiversity connectivity. The site lies within the Kent Downs Area of Outstanding Natural Beauty, a nationally designated landscape recognised for its scenic quality and mosaic of chalk grassland, woodland and agricultural habitats.

At a local scale, the application site is wholly contained within an established residential curtilage associated with The Red House. Review of aerial imagery indicates that the site comprises the existing dwelling, domestic outbuildings, hardstanding, driveway areas and managed garden land. Garden areas are predominantly laid to amenity lawn with scattered trees and shrubs typical of large residential plots, subject to regular management and ongoing human activity. No priority habitats, semi-natural habitats, hedgerows or ecological corridors are present within the application boundary, and the site does not function as supporting habitat for the qualifying features of nearby designated sites.

The proposed development is confined to the existing residential envelope and does not extend into adjacent agricultural land, woodland or designated areas. There is no loss or fragmentation of habitats beyond the domestic curtilage, and no direct or indirect impact pathways have been

identified that would give rise to adverse effects on nearby SACs, SSSIs or other designated ecological assets.

The ecological baseline of the site is therefore characterised as being of limited intrinsic habitat value, but situated within a sensitive wider ecological context due to the proximity of internationally and nationally designated sites and the presence of ecologically valuable habitats in the surrounding landscape. In this context, national planning policy, the Environment Act 2021, current Defra and Natural England Biodiversity Net Gain guidance, the Statutory Biodiversity Metric, BS 42020:2013, and relevant local planning policies emphasise the importance of delivering proportionate, site-appropriate biodiversity enhancements that respond to identified impact pathways and contribute to ecological resilience, without resulting in harm to designated or locally important ecological features.

3.0 Legislative Context

The Ecological Enhancement Plan has been prepared in accordance with the legislative and policy framework governing biodiversity protection and enhancement in England. The principal legislative mechanisms include the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017, which collectively afford protection to a range of species and habitats of conservation importance.

These frameworks protect wild birds, bats, reptiles and other protected fauna, together with their breeding sites, resting places and habitats, and place a duty on developers to avoid actions that would result in offences. In particular, works are required to be undertaken in a manner that avoids harm or disturbance to protected species, including during sensitive periods such as the bird breeding season.

The Ecological Enhancement Plan also has regard to relevant national and local planning policy, including the NPPF and policies within the Gravesham Local Plan, which seek to conserve and enhance biodiversity and ensure that development avoids, mitigates or compensates for ecological impacts where necessary.

The site lies within the zone of influence of a number of internationally and nationally designated sites associated with the North Downs landscape, including the North Downs Woodland SAC and the Halling to Trottiscliffe Escarpment SSSI. Additional SSSIs are present within the wider landscape, forming part of a connected network of designated sites of national importance.

The Habitats Regulations require that plans and projects do not result in adverse effects on the integrity of European sites, either alone or in combination. In this context, development within the zone of influence of designated sites has the potential to give rise to indirect effects through disturbance pathways rather than direct habitat loss. Such pathways may include increased human activity, lighting impacts or temporary construction-related disturbance, which may affect qualifying features of designated sites and other protected species such as bats.



The surrounding landscape comprises a mosaic of agricultural land, chalk downland, woodland blocks, tree belts and semi-natural features that contribute to functional ecological connectivity for a range of species, including birds, bats, reptiles and invertebrates. The site lies within the Kent Downs AONB, a nationally designated landscape recognised for its scenic quality and ecological value. The Kent and Medway LNRS identifies the wider area as having strategic opportunities for habitat protection, restoration and enhancement, particularly in relation to chalk grassland, woodland and farmland habitats associated with the North Downs.

The application site itself is confined to an established residential curtilage comprising existing built form, hardstanding and managed garden areas and does not support designated or priority habitats. The proposed development has been informed by Natural England standing advice, local planning policy and LNRS objectives and incorporates proportionate avoidance, mitigation and enhancement measures to ensure no adverse effects on designated sites or associated species.

At a national policy level, the NPPF requires planning decisions to minimise impacts on biodiversity, avoid significant harm and seek opportunities to enhance biodiversity where possible. Best-practice guidance is provided by BS 42020, which promotes a proportionate, evidence-led approach to biodiversity consideration and should be read alongside the Environment Act 2021 and the associated BNG framework.

Although the proposed development is considered exempt from mandatory BNG requirements, the principles of the BNG framework and the strategic objectives of the LNRS have informed the approach to ecological enhancement. The measures proposed are proportionate to the scale and nature of the development and are intended to ensure compliance with statutory requirements, support the conservation objectives of designated sites, and contribute to the wider ecological network without resulting in adverse effects on protected species or habitats.

4.0 Ecological Enhancement

4.1 Avian Enhancements

In accordance with Natural England standing advice and relevant planning policy, the proposed development incorporates proportionate biodiversity enhancement measures appropriate to the scale and nature of the works. While the wider landscape supports habitats utilised by a range of bird species, including farmland and woodland birds, the application site is located within an established residential curtilage and does not provide habitat suitable for ground-nesting or disturbance-sensitive species associated with nearby designated sites.

The development footprint comprises existing built form, hardstanding and managed garden areas subject to regular human activity. Trees and boundary vegetation within and around the site are typical of rural residential settings and may provide potential nesting opportunities for common bird



species, although no specific bird surveys have been undertaken to confirm nesting activity. In this context, the provision of modest, targeted enhancement is considered appropriate and proportionate.

To support common bird species associated with woodland edge, farmland margins and rural residential environments, and to provide a measurable biodiversity enhancement in accordance with BS 42020, the development shall incorporate dedicated bird nesting provision.

A single bird nesting box suitable for small passerine species (such as tit species or sparrow) shall be installed on the dwelling, a retained outbuilding, or a suitable mature tree within the garden, subject to final positioning on site.

The bird box shall be installed in accordance with the following principles:

- Installed at a height of approximately 2.5–4.0 m above ground level;
- Oriented to face north-east, or otherwise positioned to avoid prevailing wind and direct sunlight;
- Located away from areas of frequent human activity and artificial lighting where practicable; and,
- Securely fixed using appropriate fixings suitable for the mounting location.

The bird box shall be installed prior to first occupation or substantial completion of the development and shall thereafter be retained for the lifetime of the development. Periodic inspection and replacement shall be undertaken if required to ensure continued functionality.

The bird box to be installed shall comprise a Schwegler 1B Nest Box or similar, as illustrated in Figure 4.1 below.



Figure 4.1 – Schwegler 1B Nest Box

No routine vegetation clearance, maintenance activities, cleaning, or other works with the potential to disturb nesting birds shall be undertaken during the bird breeding season (March to August inclusive), unless a suitably qualified ecologist has confirmed that no active nests would be affected.

The surrounding countryside supports habitats relevant to a range of priority species identified within Countryside Stewardship targeting and the LNRS, including farmland and ground-nesting birds such as corn bunting, lapwing, curlew, redshank and snipe. These species are associated with open agricultural landscapes, chalk downland, river valleys and wet grassland systems that function as upland or semi-upland breeding areas during the breeding season, providing suitable nesting, feeding and low-disturbance conditions at a landscape scale. While these species form part of the wider ecological context, domestic gardens and developed residential curtilages are not considered to constitute functional breeding or supporting habitat for such species, and ground-nesting farmland birds do not utilise artificial nesting structures such as bird boxes. Accordingly, the proposed bird box provision supports common bird species typical of rural residential environments without drawing pressure away from, or increasing competition within, habitats used by priority species in the surrounding countryside.

The provision of these measures is considered proportionate to the scale of the development and appropriate to the ecological context of the site, contributing to local biodiversity enhancement and supporting bird species associated with the wider landscape and nearby designated sites.



4.2 Bat Mitigation and Enhancement

The wider landscape surrounding the site comprises a mosaic of woodland blocks, tree belts, hedgerows and open countryside that is typical of the rural setting and is likely to support bat foraging and commuting activity. While the application site itself lies within an established residential curtilage and does not comprise features typically associated with bat roosting, bats are likely to be present within the surrounding environment and may pass through the wider landscape.

In accordance with the recommendations set out within the Bat Scoping Survey (refer to Appendix C), the following mitigation measures shall be implemented to avoid adverse effects on bats during the works:

- Works to external building fabric, including roof coverings, soffits, fascias and other potential access features, shall be undertaken using a precautionary soft-strip approach, with materials removed carefully by hand where practicable;
- All works shall be undertaken during daylight hours only;
- Any cavities, gaps or crevices exposed during the works shall be checked visually prior to removal or permanent sealing. Should a bat be encountered at any stage, works in the immediate area shall cease and advice shall be sought from a suitably qualified ecologist in accordance with the Bat Scoping Survey recommendations;
- No intentional harm to bats shall occur, and all works shall be undertaken in accordance with the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017; and,
- External lighting associated with the development shall be designed and installed to minimise light spill onto retained vegetation, garden boundaries and potential bat flight paths, and shall avoid direct illumination of the installed bat box, in line with the guidance referenced within the Bat Scoping Survey.

These measures reflect the low likelihood of bat roosting identified within the Bat Scoping Survey and are considered proportionate to the scale and nature of the development. Further details are provided in Appendix C for reference.

Within the context of the site, the provision of a dedicated bat roosting feature is considered an appropriate and proportionate biodiversity enhancement, consistent with Natural England standing advice, BS 42020 and the ecological context of the site. The measure is intended to provide additional roosting opportunity for common bat species associated with rural and semi-rural landscapes and does not imply the presence of an existing bat roost within the development footprint.

A single bat box shall be installed as part of the development. The bat box shall comprise a durable, purpose-designed unit suitable for crevice-dwelling bat species commonly associated with rural residential environments (for example a Schwegler 1FF or equivalent).



The bat box shall be installed on the dwelling, a retained outbuilding or a suitable mature tree within the garden, subject to final positioning on site, and in accordance with the following principles:

- Positioned at a height of approximately 4.0 m above ground level;
- Located on a relatively quiet elevation or aspect, away from regular human activity, doors and windows;
- Oriented to minimise exposure to artificial lighting and excessive solar gain, with a south-east or south-west facing aspect preferred; and,
- Securely fixed, with the access point kept clear of obstructions.

The bat box shall be installed prior to first occupation or substantial completion of the development and shall thereafter be retained for the lifetime of the development. Periodic inspection and replacement shall be undertaken if required to ensure continued functionality.

Any new external lighting associated with the development shall be designed and installed to minimise light spill onto surrounding garden areas and retained vegetation and to avoid direct illumination of the bat box location, in accordance with current best-practice guidance.

The provision of this measure is intended as a proportionate enhancement only and does not imply the presence of a bat roost within the application site or the need for further survey, mitigation or licensing.

4.3 Invertebrate Enhancements

Invertebrates form an important component of the wider ecological network, supporting higher trophic levels including birds and bats. While the application site itself is confined to an established residential curtilage and comprises existing built form, hardstanding and managed garden areas, the surrounding landscape includes grassland, woodland edges and hedgerows typical of the rural North Downs setting, which are likely to support a range of common invertebrate species. In this context, the provision of a small-scale invertebrate feature is considered an appropriate and proportionate biodiversity enhancement.

A minimum of one invertebrate habitat feature shall be provided as part of the development. This shall comprise either:

- a purpose-built insect hotel constructed from natural, untreated materials; or,
- a discrete log or deadwood pile created using untreated timber.

The invertebrate feature shall be located within a quiet part of the garden or at the site margin, positioned away from areas of frequent disturbance where practicable. It shall be installed directly on the ground or securely positioned to ensure stability and longevity and located in an area that is not subject to regular disturbance, waterlogging or excessive shading.



The invertebrate habitat feature shall be installed prior to first occupation or substantial completion of the development and shall thereafter be retained for the lifetime of the development. The feature shall be left undisturbed and only replaced if it becomes unsafe or non-functional.

This measure is intended to provide additional microhabitats for common invertebrate species and to contribute to local biodiversity enhancement in a manner proportionate to the scale and nature of the development, supporting wider ecological function within the surrounding landscape and aligning with the objectives of the Kent and Medway LNRS.

5.0 Conclusion

This Ecological Enhancement Plan has been prepared to address the requirements of Conditions 3 and 4 of the planning permission and to identify proportionate biodiversity enhancements appropriate to the scale, nature and location of the development. The measures proposed have been informed by the ecological context of the site, the findings of the Bat Scoping Survey (Appendix C), relevant consultation responses, and recognised best-practice guidance.

The enhancement measures comprise a suite of discrete, low-maintenance features for birds, bats and invertebrates that are suitable for delivery within an established residential curtilage. The measures are designed to contribute to local biodiversity and ecological resilience and are not reliant on the confirmed presence of protected species within the application site. They are intended to provide indirect ecological benefit without resulting in additional land take, management burden or disturbance.

Having regard to the characteristics of the site, the limited intrinsic habitat value within the development footprint, and the absence of functional linkage to nearby designated ecological features, the proposed enhancements are considered proportionate and appropriate to the ecological sensitivities of the surrounding landscape. No further measures are recommended, as additional interventions would be disproportionate to the scale of the development and are unlikely to deliver meaningful ecological benefit.

On this basis, the ecological enhancement and mitigation measures set out within this Plan are considered sufficient to satisfy the requirements of Conditions 3 and 4 and to accord with relevant legislation, planning policy and best-practice guidance.

End of Report



DC Development Consultants
Driving Sustainable Development

APPENDIX A – Appeal Notice



Appeal Decision

Site visit made on 25 November 2025

by E Dade BA (Hons) MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 3rd December 2025

Appeal Ref: APP/K2230/D/25/3373993

The Red House, Wrangling Lane, Luddesdown, Kent DA13 0XF

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mr Andy Wilson against the decision of Gravesham Borough Council.
 - The application Ref is 20240236.
 - The development proposed is front, side and rear extensions with internal alterations.
-

Decision

1. The appeal is allowed and planning permission is granted for front, side and rear extensions with internal alterations at The Red House, Wrangling Lane, Luddesdown, Kent DA13 0XF in accordance with the terms of the application, Ref 20240236, subject to the conditions in the attached schedule.

Preliminary Matters

2. At time of my site visit, the dwelling and detached garage had been refurbished, hardstanding areas had been added to the garden, and a front, side, and rear extension were under construction and substantially complete. Therefore, at time of my decision, the proposal is partly implemented. This weighs neither for nor against the proposal which I have determined on the basis of the submitted plans.
3. In addition, there are two outbuildings on site. Outbuildings 1 and 2 are annotated on the existing site plan¹ and shown in photographs within the delegated report and therefore were in situ at the time of the Council's decision. The outbuildings do not comprise a part of the appeal proposal which relates to extension works and internal alterations to the main dwelling only.

Main Issue

4. The main issue in this appeal is whether the proposed development would be inappropriate development in the Green Belt.

Reasons

5. The appeal property is a detached chalet bungalow located within a generous plot, set back from the highway by a large front garden. The site is within a countryside location within the Metropolitan Green Belt.
6. Paragraph 143 of the National Planning Policy Framework (the Framework) identifies the fundamental aim of Green Belt policy is to prevent urban sprawl by

¹ Drawing no WR/01 Rev A

keeping land permanently open, and the essential characteristics of Green Belts are their openness and their permanence.

7. Development in the Green Belt is inappropriate unless it complies with certain exceptions identified by the Framework. This includes paragraph 154(c) which indicates an extension or alteration of a building would not be inappropriate development, provided it does not result in disproportionate additions over and above the size of the original building.
8. Saved Policy C13 of the Gravesham Local Plan First Review 1994 (LP) sets out criteria for the development of extensions to dwellings in the countryside and thus applies to dwellings both within and outside the Green Belt. Policy C13 is consistent with the Framework insofar as it would limit the scale of extensions in this Green Belt location.
9. At criterion (ii), Policy C13 imposes a limit on the external floor area of extensions, requiring it not exceed one third of the gross external floor area of the original dwelling² prior to any later extension or alteration, unless the increased floorspace has no overall effect on the existing bulk and appearance of the dwelling.
10. The dwelling and detached garage are shown on Kent County Council's Heritage Maps 1929-1952 and were likely in situ on 1 July 1948. This includes a demolished side extension but excludes the rear lean-to structure. The Council's delegated report concludes the proposal would result in a 43.8% increase of the original dwelling's footprint. This moderately exceeds the external floor area limit set out at Policy C13(ii).
11. From the public highway, the rear extension would be concealed from view by the dwelling's main volume. The side extension's parapet roof would minimise its height and perceived scale and would appear subservient to the main dwelling.
12. The glazed front extension would comprise an entrance hall and would sit at the centre of the front elevation. The proposed alterations to the roof would add volume at first floor level to provide additional rooms, accommodated within a hipped roof and served by pitched-roofed dormers. Therefore, the dwelling would retain its 1.5 storey form and appearance of a chalet bungalow.
13. The design of the proposed extensions has been subject to negotiations between the Council and appellant, limiting the height and overall bulk. The delegated report concludes the proposal would not result in the appearance of the property becoming unbalanced, would be symmetrical with evenly distributed dormers and barn hipped edges. In addition, the report concludes the alterations would not result in the property appearing incongruous with its surroundings. Crucially, the delegated report considers that, in isolation, the extensions to the dwelling would likely be considered acceptable.
14. Consequently, whilst the proposed extensions would exceed the external floor area limit, the proposal would not add harmful bulk nor harm the appearance of the dwelling. Therefore, the proposal would comply with the requirements of Policy C13(ii) for extensions to dwellings in the countryside.
15. Works to the garden include a widened driveway, patio, sun terrace, and a retaining wall between sections of the rear garden of differing levels. Therefore,

² As at 01 July 1948 or as first built

the proposal would increase the area of hardstanding within the site. However, the majority of the garden is laid to lawn and vegetated. Notably, the front garden includes a large lawn area interspersed with small trees and is enclosed by a new hedge which is effective in screening hardstanding areas to the front and side of the dwelling. I am satisfied that these modest engineering operations preserve openness and do not conflict with the purposes of the Green Belt.

16. The Council refer to the Warwick judgement³ which concludes that the Framework's exception for extensions in the Green Belt is not to be interpreted as being confined to physically attached structures but, for the purposes of that provision, an extension can include structures which are physically detached from the building of which they are an extension.
17. The Council consider outbuildings 1 and 2 would comprise domestic extensions to the dwelling. Considered cumulatively with the outbuildings' footprint, the proposal would result in a significant floor area increase to the original dwelling of 105%.
18. However, paragraph 43 of the Warwick judgement indicates that regard should be had to the proximity of the new building to the existing building; to the purpose and use of the buildings; and to factors such as the size of the buildings.
19. Outbuildings 1 and 2 are at the side of the dwelling, separated from it by a patio and area of garden and are visible from the site's frontage. Outbuilding 1 is a six-bay kennel block of single storey height with a large footprint. Outbuilding 2 is of low height and small footprint and houses a pond pump. Therefore, the two outbuildings differ significantly in scale.
20. Two applications for certificates of existing lawful development have been refused by the Council (hereafter, *May 25* and *Nov 25 LDC decisions*)⁴.
21. In the May 25 LDC decision, the Council conclude the application was supported by insufficient information to determine with certainty that the use of the kennel outbuilding would be incidental to the personal enjoyment of the dwellinghouse. In the Nov 25 LDC decision, the application sought to use bays 1-3 for garden machinery and garden furniture storage and bays 4-6 as kennels, which the delegated report concludes would be incidental to the dwelling. However, it is unclear how use of kennel bays only for domestic storage would be enforced.
22. The May 25 and Nov 25 LDC decisions confirm the outbuildings fail to comply with Schedule 2, Part 1, Class E.3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) on the basis the outbuildings are situated on land between a wall forming a side elevation of the dwellinghouse and the boundary of the curtilage of the dwellinghouse.
23. Consequently, the outbuildings are not accepted as lawful development. Furthermore, I have no compelling reason to consider permission would be granted in the event a planning application were submitted.
24. The Warwick judgement requires consideration of the building's purpose and use. To regard the outbuildings as a normal domestic adjunct would be inconsistent with the LDC decisions which confirm the outbuildings are not lawful development.

³ Warwick District Council v Secretary of State for Levelling Up, Housing and Communities & Others [2022] EWHC 2145 (Admin)

⁴ LPA refs: 20250272 refused 16 May 2025 relating to outbuildings 1 & 2, and 20250972 refused 24 November 2025 relating to outbuilding 1 only.

25. Therefore, there is insufficient justification to take account the floor area of the outbuildings for the purposes of the paragraph 154(c) assessment. Paragraph 43 of the Warwick judgement recognises there will be circumstances where some detached structures would be found to amount to extensions of existing buildings, but others would not.
26. As set out above, the proposed extensions would increase the external floor area of the dwelling but would not add harmful bulk nor harm the appearance of the dwelling. For this reason, I consider the proposal would not result in disproportionate additions over and above the size of the original building. The proposal would accord with Framework paragraph 154(c) and would not be inappropriate development in the Green Belt.
27. The proposal would therefore comply with saved LP Policy C13 which restricts extensions to dwellings in the countryside to modest extensions, and Policy CS19 of the Gravesham Local Plan Core Strategy (CS) which requires proposals conserve and enhance the character of the local built environment and integrate well with the surrounding area.
28. In addition, since the proposal relates to the extension of an existing dwelling it would be consistent with CS Policy CS02 which distributes housing and employment growth to settlements outside the Green Belt.

Other Matters

29. The site is located within the Kent Downs National Landscape (KDNL). The statutory purpose of National Landscapes is to conserve and enhance the natural beauty of the area. Section 245 of the Levelling-up and Regeneration Act 2023 requires relevant authorities 'seek to further' the statutory purposes of Protected Landscapes, including National Landscapes. Furthermore, paragraph 189 of the Framework instructs that great weight be given to conserving and enhancing the landscape and scenic beauty in National Landscapes, which have the highest status of protection in relation to these issues.
30. The area is characterised by undulating topography with a mix of arable and pasture farmland, areas of native woodland, narrow winding lanes that follow the contours with small settlements and farmsteads located along lanes. Due to its location in quiet, rural area, and mature landscaping on the boundaries and around the site, the appeal property is of limited visibility from public vantage points. The area has a variety of building sizes and designs. As discussed above, the proposed extension would not add harmful bulk nor harm the dwelling's appearance and would not result in the property appearing incongruous with its surroundings. Therefore, the proposal would have a neutral effect on the landscape and scenic beauty of the KDNL which would be consistent with the statutory purposes of Protected Landscapes.

Conditions

31. The Council has provided a list of suggested conditions which I have considered against the Framework's tests. Since the proposal is part implemented, I have not included a condition imposing a time limit for the commencement of development. However, in the interests of certainty, I have attached a condition requiring the development be carried out in accordance with the approved plans.

32. To maintain the character and appearance of the KDNL, I have attached a condition requiring submission of details of external finishing materials.
33. To enhance biodiversity in accordance with CS Policy CS12, and to conserve protected species, I have attached conditions requiring submission of details of how the development will enhance biodiversity and requiring the development hereby be carried out in accordance with section 4 of the Bat Scoping Survey.
34. I have not imposed the suggested condition relating to the removal of permitted development rights. Paragraph 55 of the Framework indicates planning conditions should not be used to restrict national permitted development rights unless there is clear justification to do so. Such a condition would not be necessary to make the appeal proposal acceptable in planning terms and would not comply with the Framework.

Conclusion

35. For the reasons given above, having regard to the development plan taken as a whole and all other relevant material considerations, I conclude the appeal should be allowed.

E Dade

INSPECTOR

Schedule of Conditions

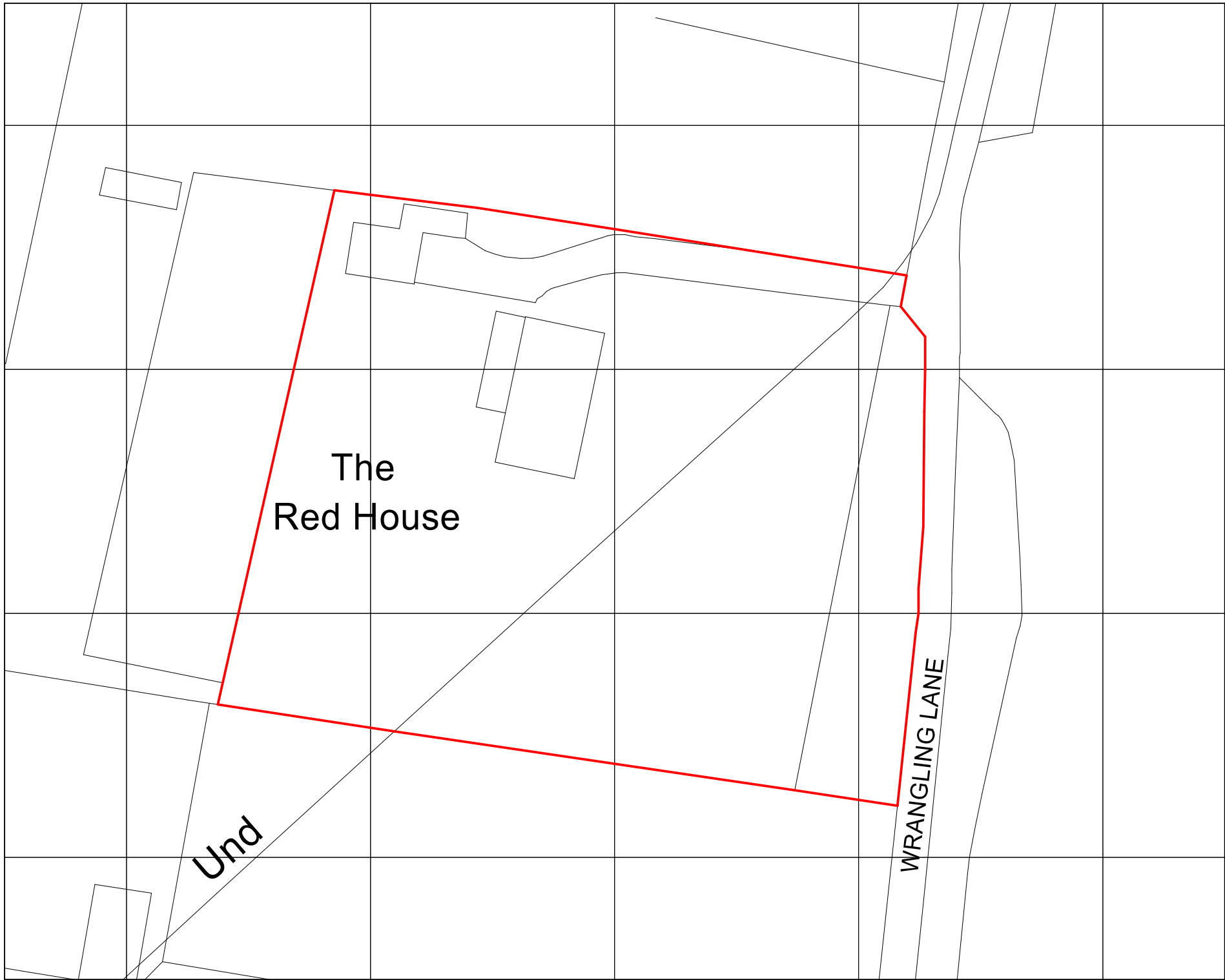
- 1) The development hereby permitted shall be carried out in accordance with drawing nos: Existing Location Map & Block Plan 23-028-LMBP; Existing and Proposed Site Plans WR/01 Rev A; Existing Floor Plans & Elevations WR/02; Proposed Floor Plans & Elevations WR/03.
- 2) Within 3 months of the date of this decision, details of the materials to be used in the construction of the external surfaces of the extension hereby permitted shall be submitted to the local planning authority for approval. The development shall be carried out in accordance with the approved details.
- 3) Within 3 months of the date of this decision, details of how the development will enhance biodiversity will be submitted to the Local Planning Authority for approval. The approved details will be implemented and thereafter retained.
- 4) The development hereby permitted shall be carried out in accordance with section 4 of the submitted Bat Scoping Survey (Crossman Associates, September 2024). Measures to be adhered to include precautionary measures for roosting bats (soft strip and sensitive lighting) during the development and the provision of a single, durable bat box affixed approximately 3-4m high to a mature garden tree, facing southwest or southeast and not near to any artificial light, prior to substantial completion of the development.

END OF SCHEDULE

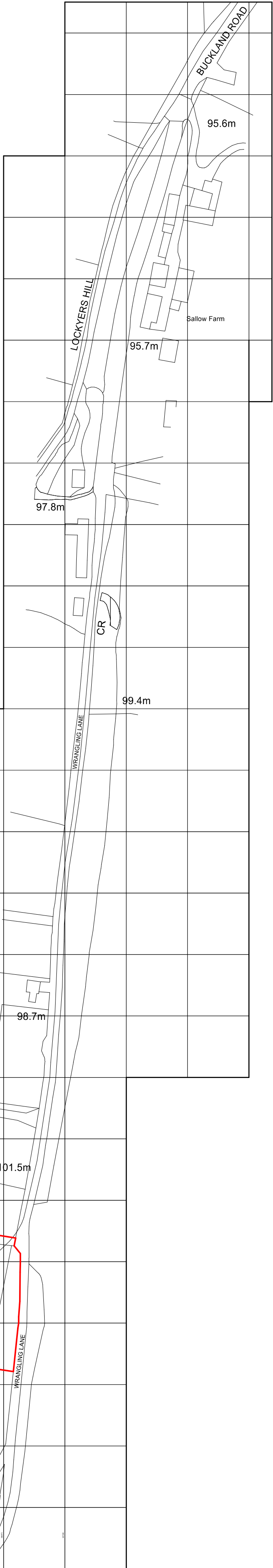
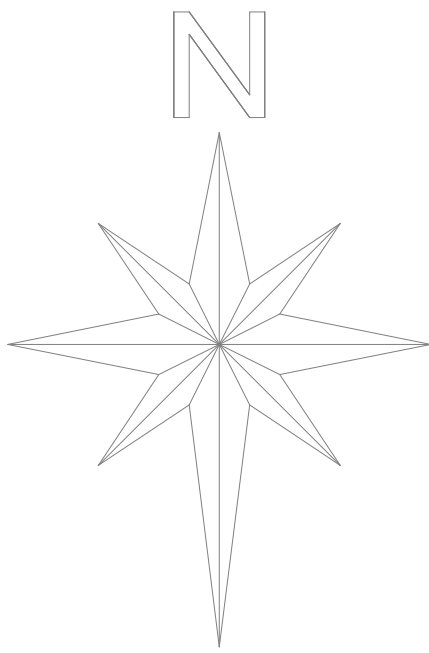


DC Development Consultants
Driving Sustainable Development

APPENDIX B – Drawings



1:500 Block Plan



Ordnance Survey, (c) Crown Copyright 2024. All rights reserved. Licence number 100022432



1:1250 Location Map

Elsigood Associates

BUILDING SURVEYING & ARCHITECTURAL DESIGN
21 Main Street
Barton under Needwood
Staffordshire
DE13 8AA

Tel: 01283 617 612

Chislehurst Bus. Centre
1 Bromley Lane
Chislehurst, Kent
BR7 6LH

Tel: 020 8191 7612

NOTES:

Drawings produced are for planning consent and building regulation approval only and may not cover all elements required to ensure project completion.

All dimensions to be checked on site by contractor.

All discrepancies with the drawings/specifications to be raised and clarified with Elsigood Associates Limited.

All workmanship and materials to comply with current British/European standards, codes of practice & manufacturers instructions.

Do not scale from drawing.

Drawings remain the property of Elsigood Associates Limited and can not be photocopied (copyright law) or used in any way without the permission of Elsigood Associates Limited.

PROJECT:

Proposed Front, Side & Rear Extensions
with Internal Alterations

TITLE:

Existing Location Map & Block Plan

SITE:

The Red House
Wrangling Lane, Great Buckland
Luddesdown, Gravesend
DA13 0XF

DATE:

12/03/2024

SCALE:

1:1250 & 1:500

DRAWING No.:

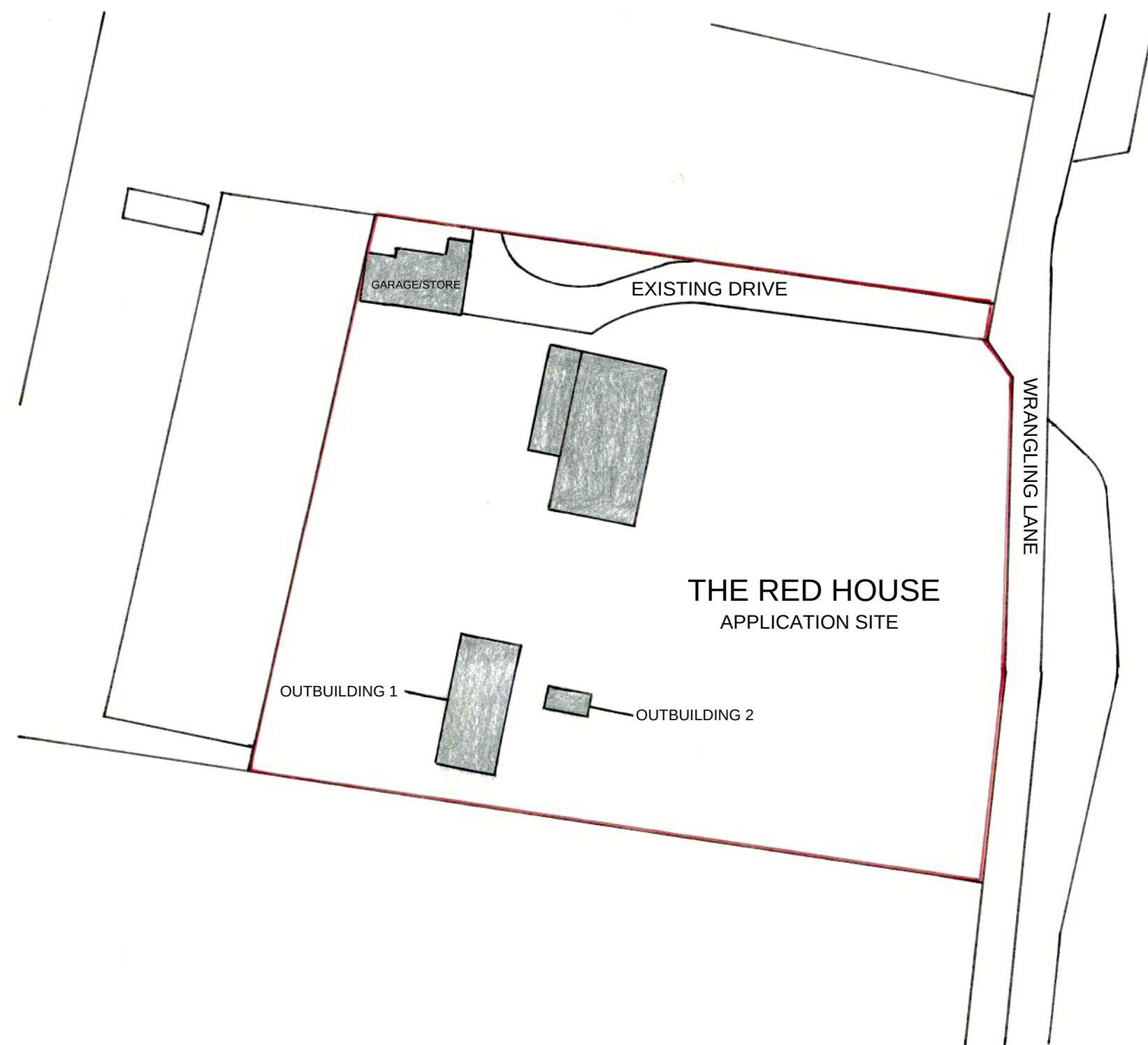
23-028-LMBP

DRAWN:

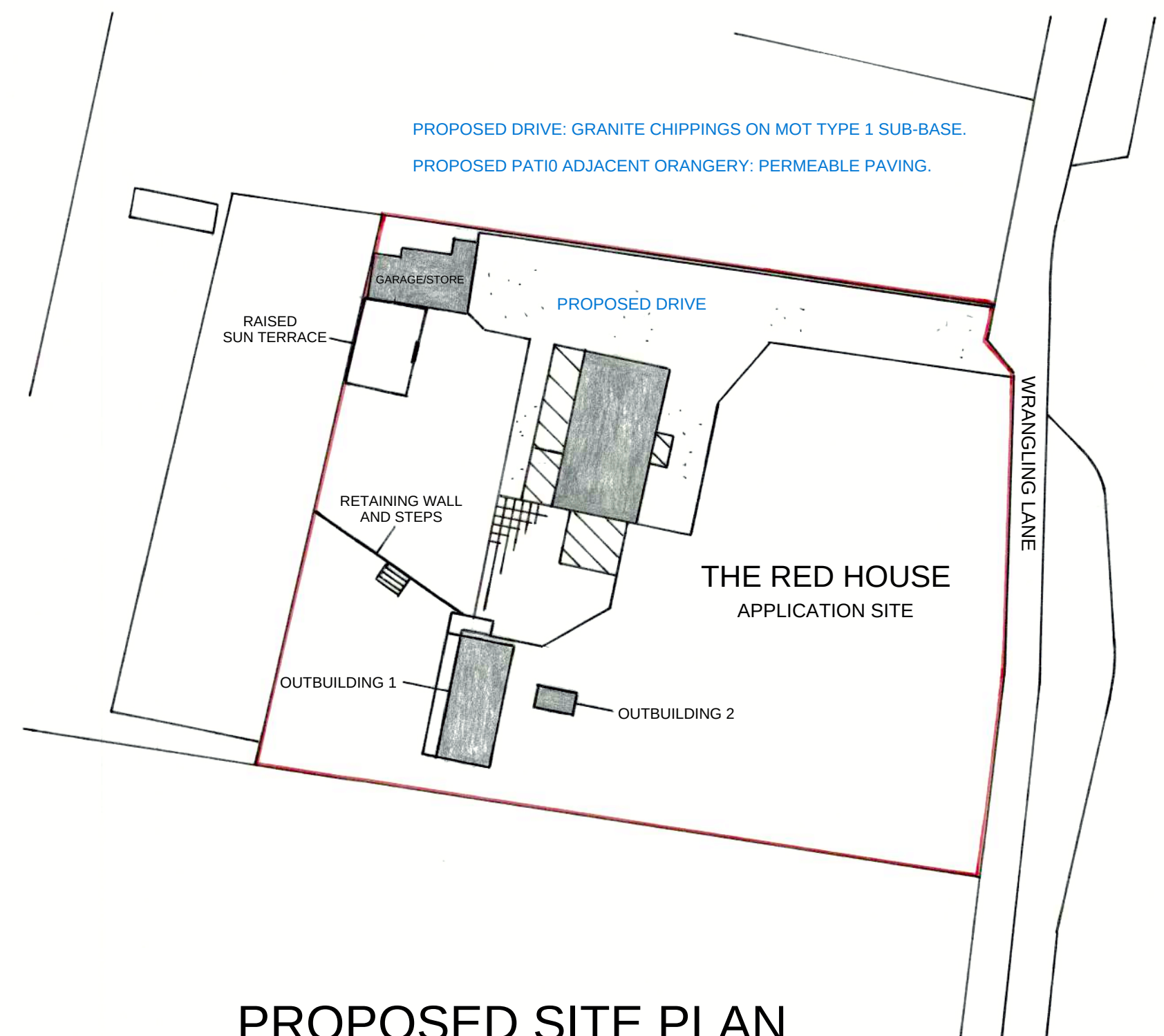
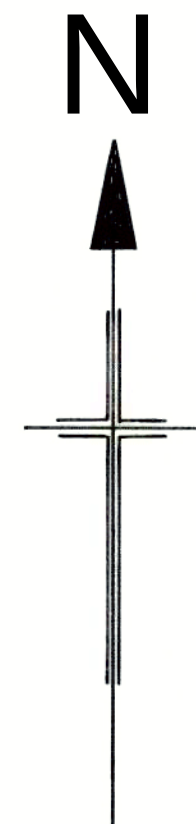
PME

REV:

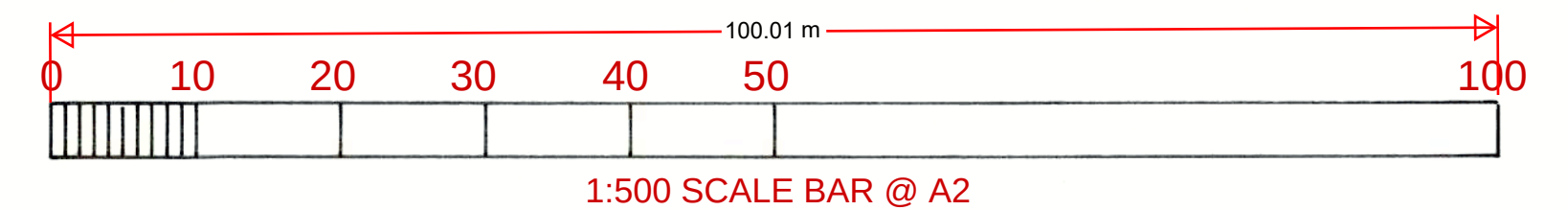
-



EXISTING SITE PLAN



PROPOSED SITE PLAN



REVISION A - 20/03/2025:

OUTBUILDINGS 1 & 2 ADDED TOGETHER WITH
RAISED SUN TERRACE AND RETAINING WALL
AND STEPS AS REQUESTED BY CASE OFFICER



PROPOSED FRONT, SIDE, REAR & FIRST FLOOR
EXTENSIONS WITH INTERNAL ALTERATIONS AT:

THE RED HOUSE WRANGLING LANE GREAT BUCKLAND
LUDESSEND GRAVESEND DA13 0XF

EXISTING AND PROPOSED SITE PLANS

SCALE: 1:500 @ A2 DRG No: WR/01 REV A 27/01/2025

DAVID HAIME | d.haime@btinternet.com | +44 7974 156510

Chartered Institute of Architectural Technologists



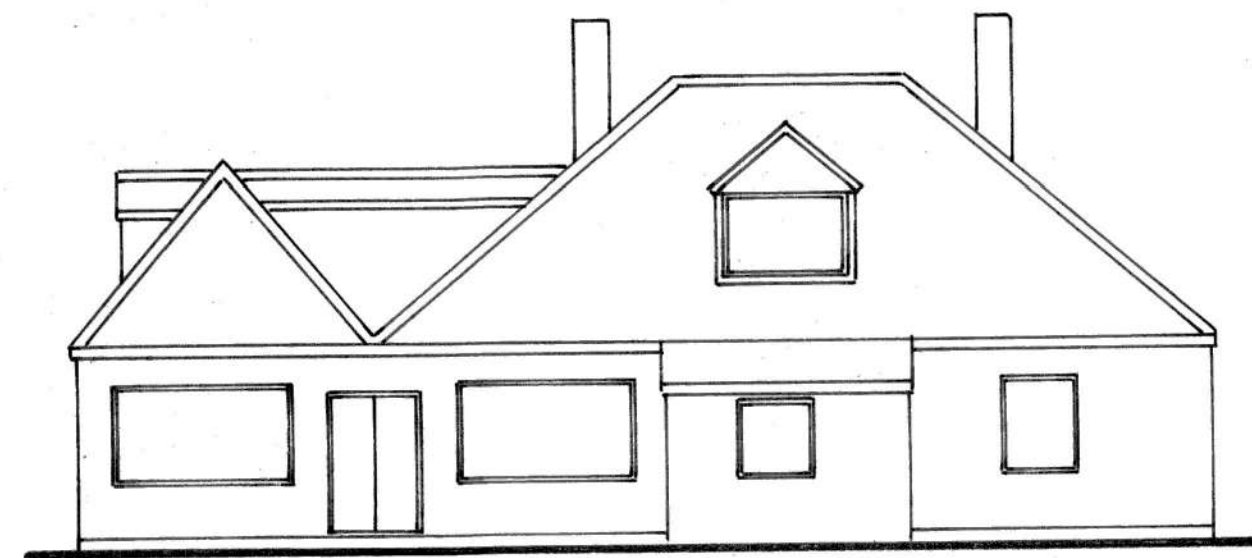
EXISTING ROOF REDLAND 49
INTERLOCKING CONCRETE TILES.

EXISTING GROUND FLOOR WHITE
PAINTED SMOOTH RENDER FINISH.

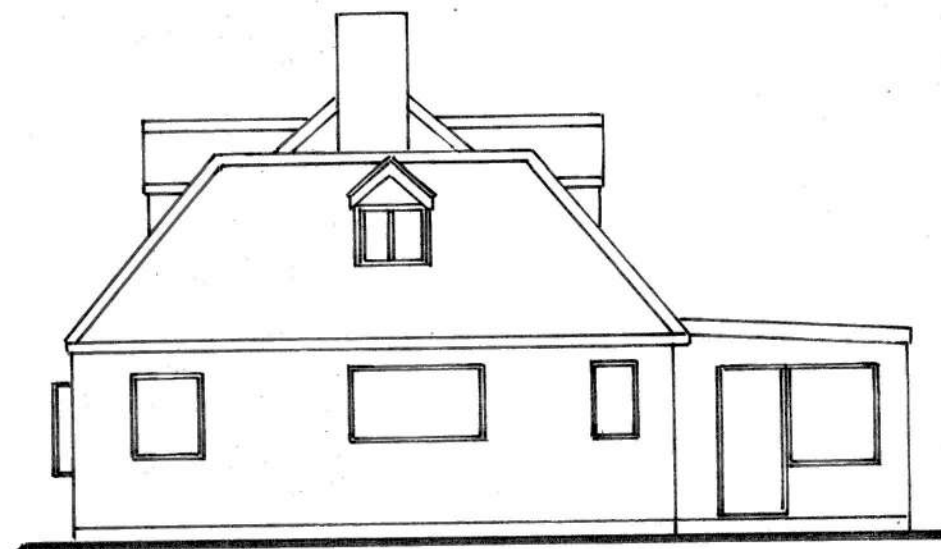
EXISTING WINDOWS AND DOORS
UPVC WHITE FINISH.



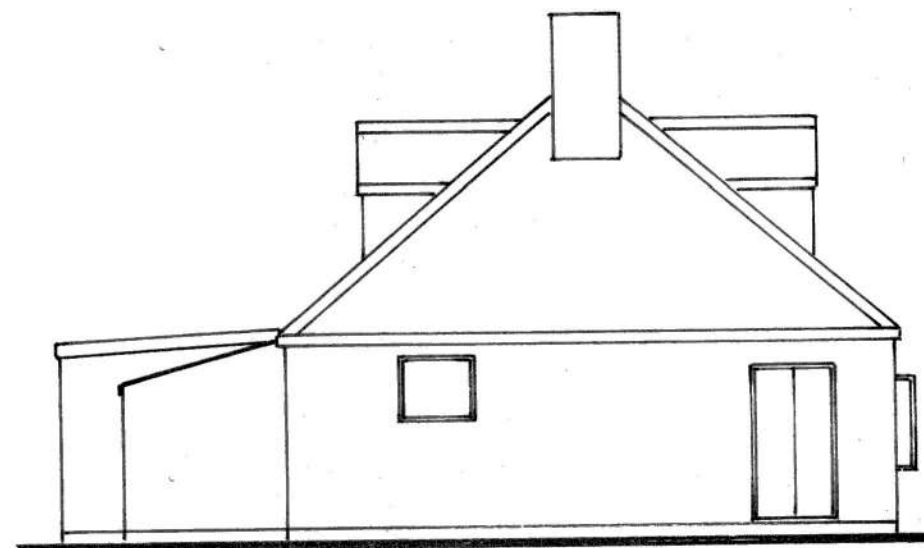
EXISTING FRONT ELEVATION



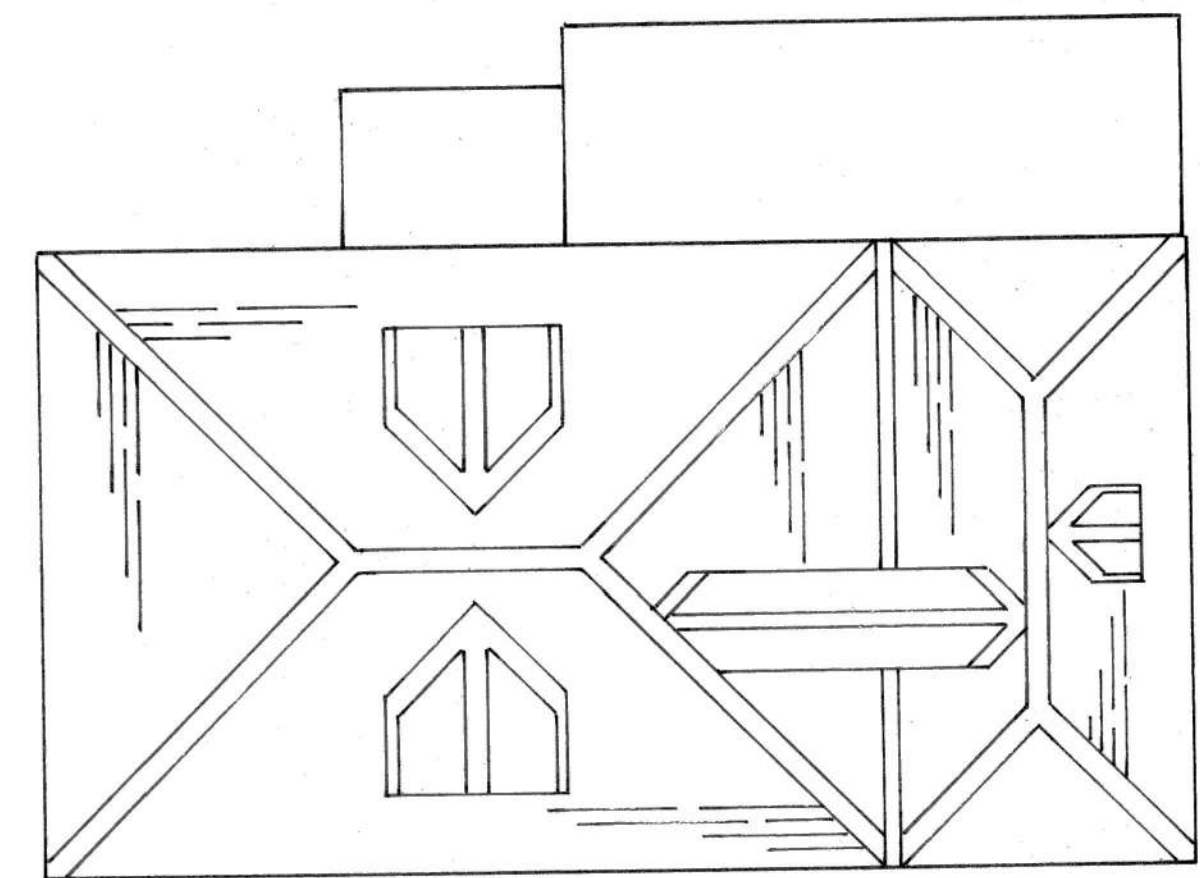
EXISTING REAR ELEVATION



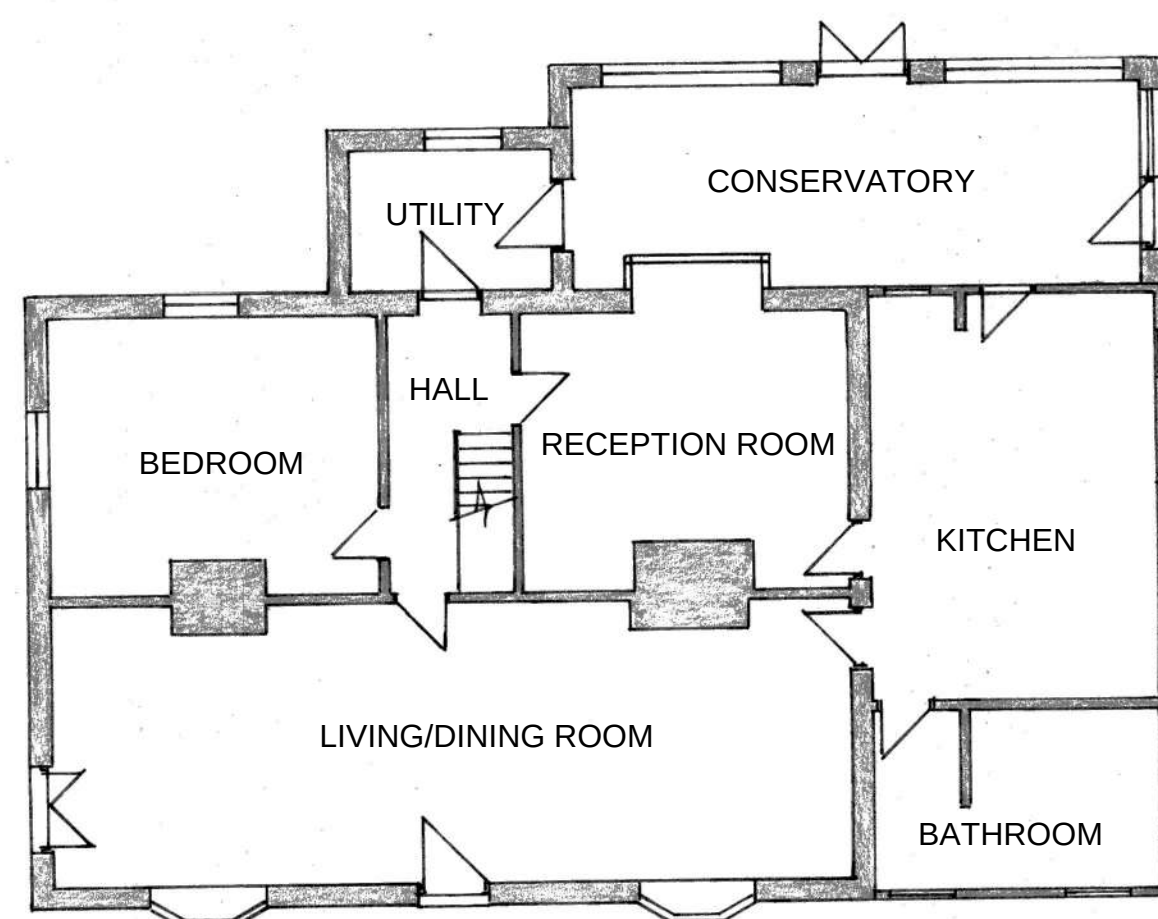
EXISTING SIDE ELEVATION - NORTH



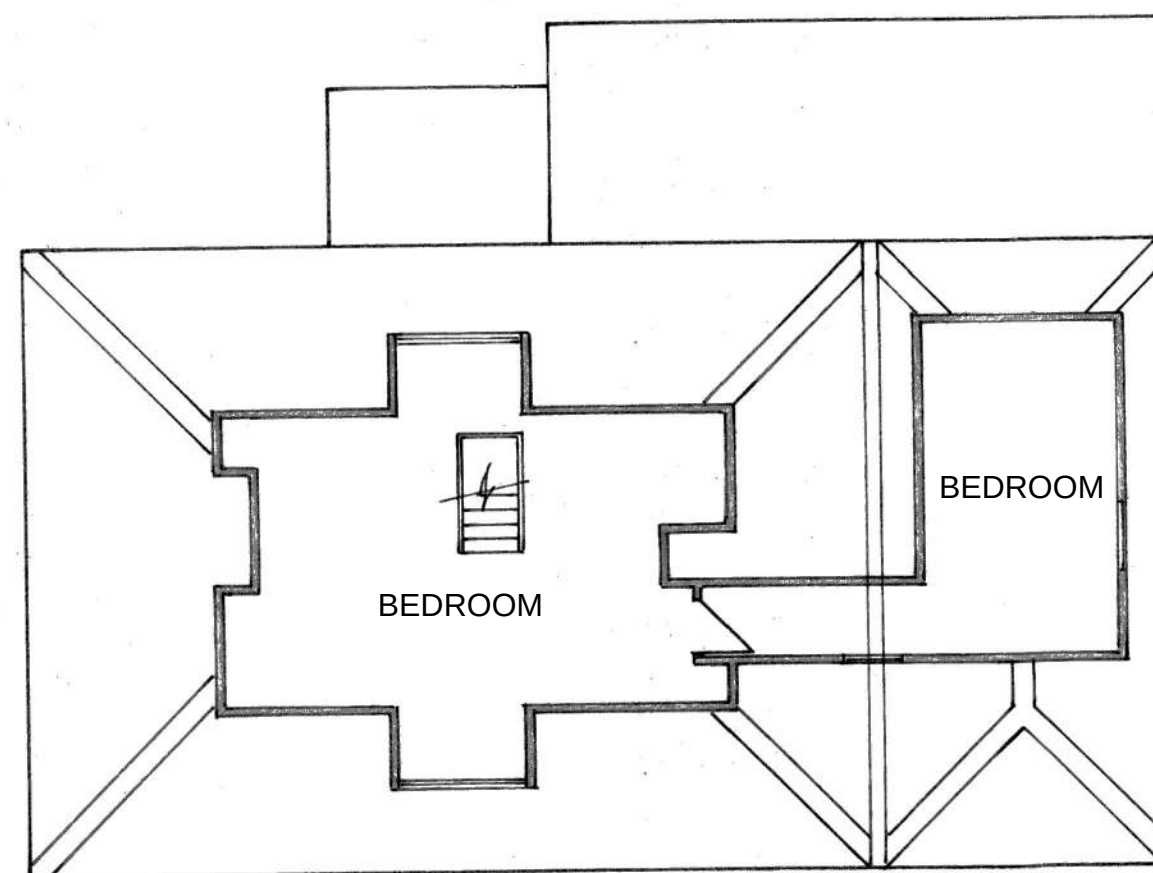
EXISTING SIDE ELEVATION - SOUTH



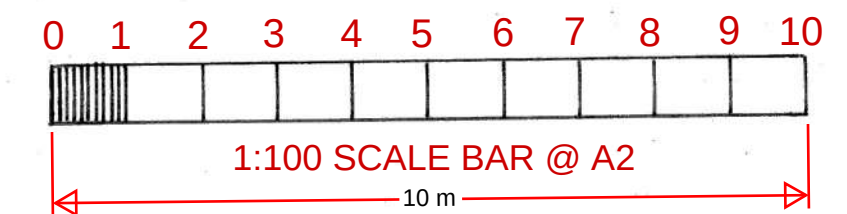
EXISTING ROOF PLAN



EXISTING GROUND FLOOR PLAN



EXISTING FIRST FLOOR PLAN



PROPOSED FRONT, SIDE, REAR & FIRST FLOOR
EXTENSIONS WITH INTERNAL ALTERATIONS AT:

THE RED HOUSE WRANGLING LANE GREAT BUCKLAND
LUDESDOWN GRAVESEND DA13 0XF

EXISTING FLOOR PLANS & ELEVATIONS

SCALE: 1:100 @ A2 DRG No: WR/02 27/01/2025

DAVID HAIME | d.haime@btinternet.com | +44 7974 156510

Chartered Institute of Architectural Technologists





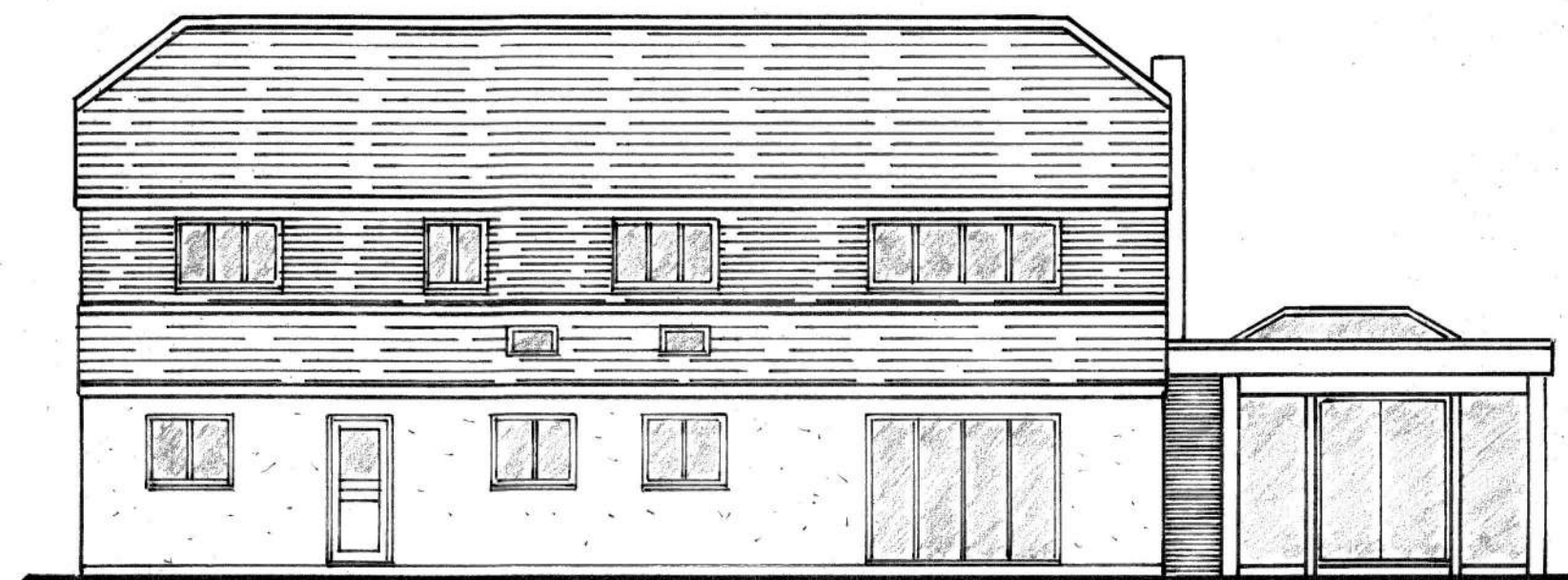
REDLAND 49 SMOOTH CONCRETE INTERLOCKING TILES TO MAIN ROOF-WITH
REDLAND SMOOTH PLAIN TILE HANGING TO FIRST FLOOR - BRECKLAND BROWN.

BLACK WOODGRAIN EFFECT UPVC WINDOWS AND DOORS.

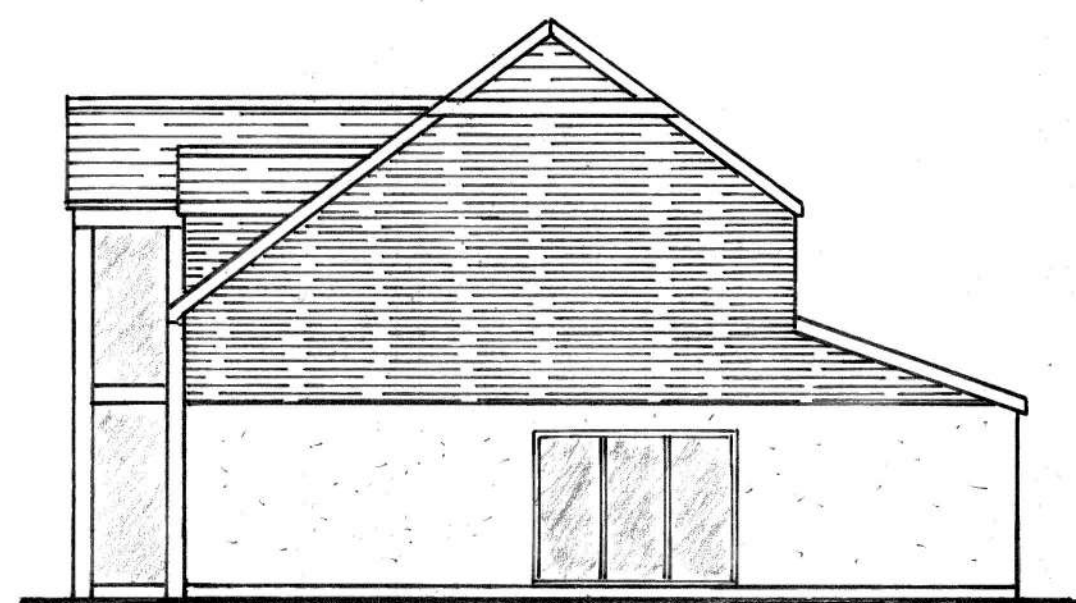
GROUND FLOOR SANDEX PAINTED SMOOTH RENDER WITH RENDER PLINTH.



PROPOSED FRONT ELEVATION



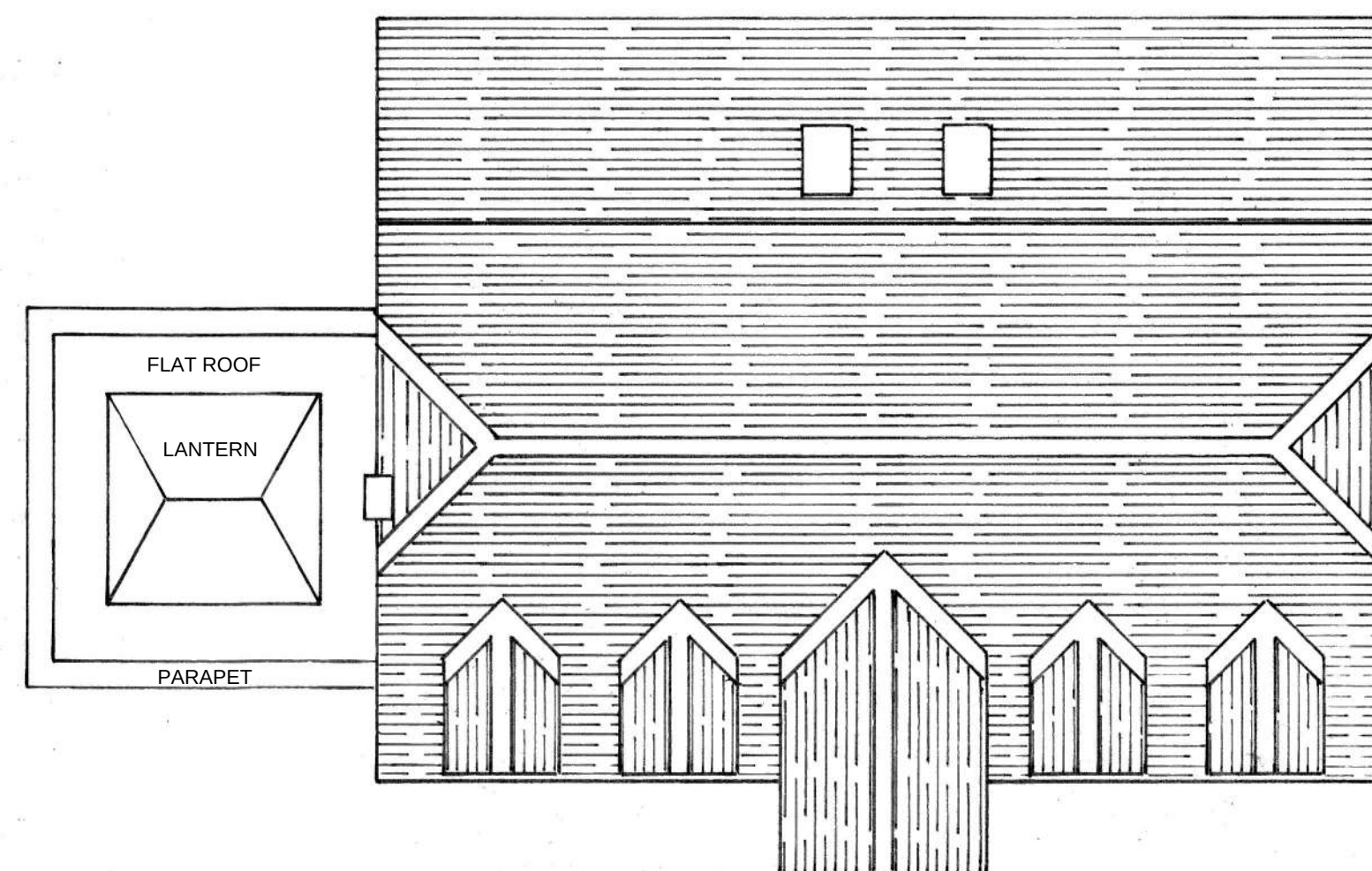
PROPOSED REAR ELEVATION



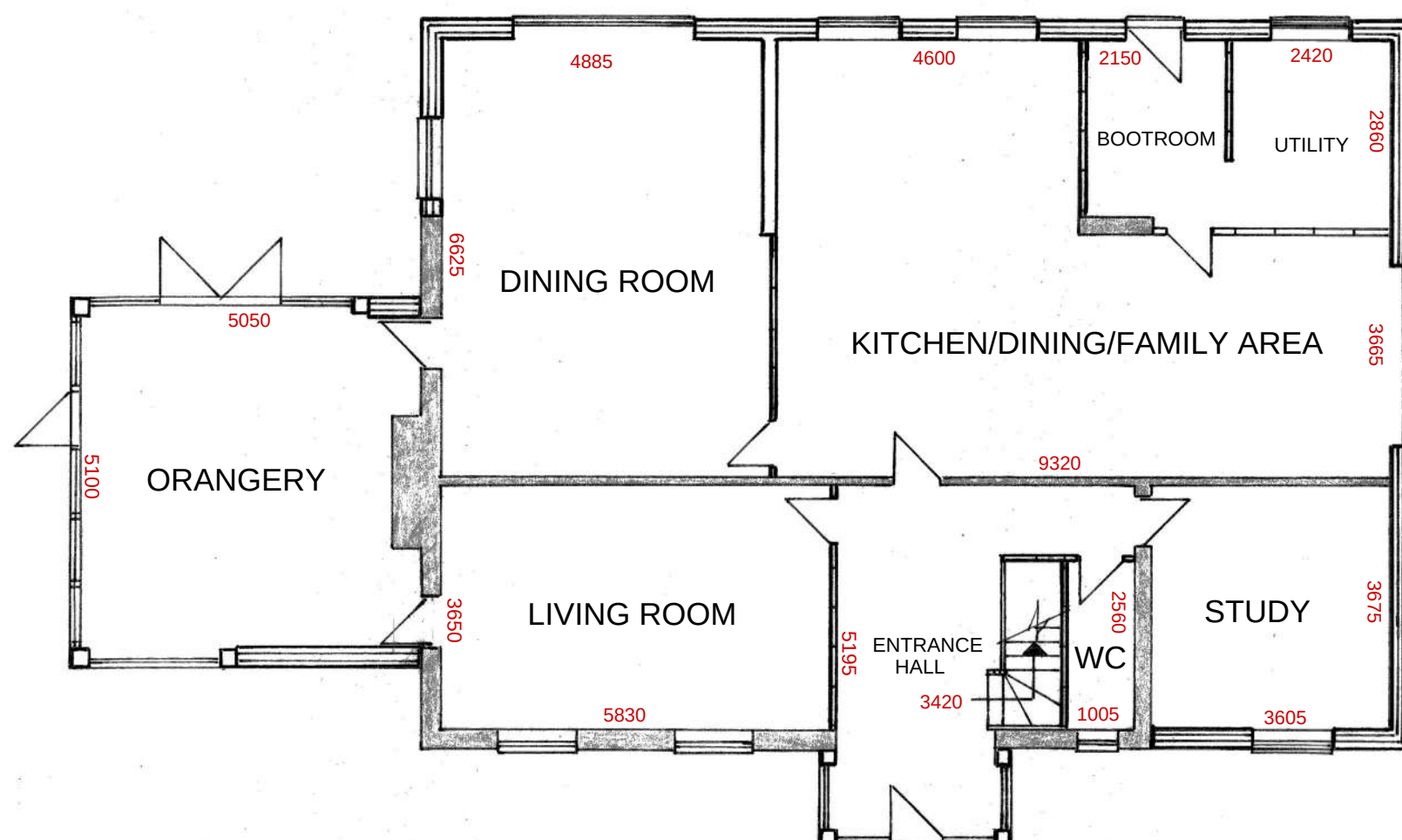
PROPOSED SIDE ELEVATION - NORTH



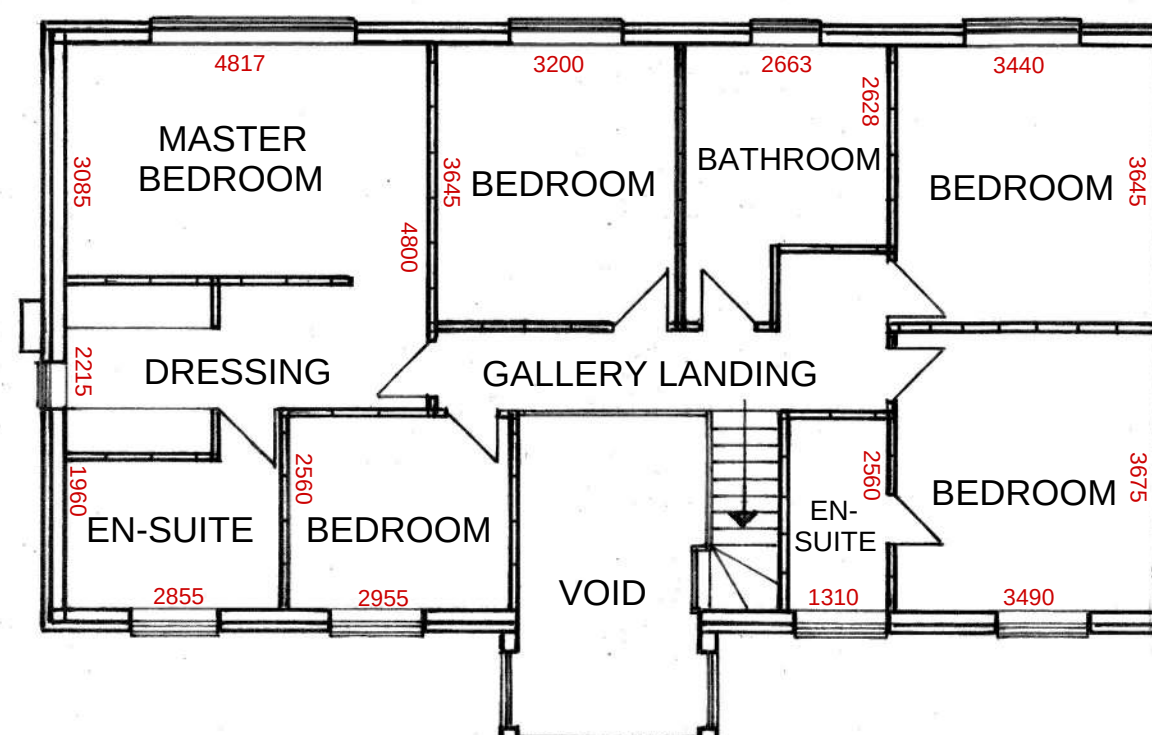
PROPOSED SIDE ELEVATION - SOUTH



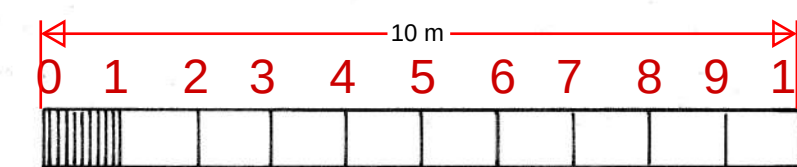
PROPOSED ROOF PLAN



PROPOSED GROUND FLOOR PLAN



PROPOSED FIRST FLOOR PLAN



1:100 SCALE BAR @ A2

PROPOSED FRONT, SIDE, REAR AND FIRST FLOOR
EXTENSIONS WITH INTERNAL ALTERATIONS AT:

THE RED HOUSE WRANGLING LANE GREAT BUCKLAND
LUDESSEND GRAVESEND DA13 0XF

PROPOSED FLOOR PLANS & ELEVATIONS

SCALE: 1:100 @ A2 DRG No: WR/03 27/01/2025
DAVID HAIME | d.haime@btinternet.com | +44 7974 156510

Chartered Institute of Architectural Technologists





DC Development Consultants
Driving Sustainable Development

APPENDIX C – Bat Survey Report

Bat Scoping Survey: The Red House, Great Buckland

Client Mr A Wilson

Reference W1171.001

Issue One

Date 3 September 2024

Written by Miguel Canovas

Crossman Associates

Ecological Consultants
Fire Engine House
Oakhill, Bath BA3 5BJ
01761 233414
info@crossmanassociates.co.uk

www.crossmanassociates.co.uk



Non-technical Summary

Background

In July 2024, Crossman Associates was commissioned to undertake a bat survey of The Red House, Wrangling Lane, Gravesend DA13 0XF. Development proposals include remodeling.

Methods

The scoping survey was undertaken by Carla Souza, an experienced ecologist and bat worker. The building was inspected both externally and internally for any evidence of bat / bird presence, such as droppings, food remains, staining or actual bats / birds. Two additional bat emergence surveys were also undertaken.

Results

The dwelling is located within a semi-rural area. Overall, the dwelling is in good condition. However, the roof provides features suitable for roosting bats and include broken/lifted roof and hanging wall tiles and gaps in the chimney concrete work.

The property has moderate suitability for roosting bats.

The bat emergence survey confirmed likely absence of roosting bats.

Recommendations

It is recommended that the following be undertaken as part of the development:

- Precautionary approach to be taken in relation to bats, birds and hedgehogs.
- Install a bat box in a garden tree of the property.
- Install a bird nest box on the exterior of the new development.
- Reduced external lighting to benefit nocturnal wildlife.

Contents

1. BACKGROUND	3
SITE DESCRIPTION	3
LEGISLATION	3
2. METHODOLOGY	5
DESKTOP STUDY	5
3. RESULTS	7
DESKTOP STUDY	7
FIELD SURVEY	9
EVALUATION	13
4. RECOMMENDATIONS	15
SPECIES RECOMMENDATIONS	15
BATS	15
ECOLOGY ENHANCEMENTS	17
5. LIMITATIONS	19
6. REFERENCES	20

1. Background

- 1.1. In July 2024, Crossman Associates was commissioned to undertake a bat survey of The Red House, Wrangling Lane, Gravesend DA13 0XF. The Ordnance Survey grid reference for the site is TQ 66946 63924. Development proposals include remodeling.
- 1.2. Figure 1 under Appendix II provides a site location map.
- 1.3. The objectives of the survey were to:
 - Make an assessment of the likely presence or absence of bats
 - Identify any legislative or planning policy constraints relevant to the site
 - Determine the need for further surveys, compensation or mitigation

Site Description

- 1.4. The building comprises a two storey detached bungalow, with a converted loft space and a mature garden.
- 1.5. The property is in a semi-rural environment in Great Buckland, Kent. Surrounding areas tend to include similar dwellings with mature gardens. Wider landscape includes farmland and ancient woodlands.

Legislation

- 1.6. In the UK all species of bats are protected under the Wildlife and Countryside Act (1981) as amended and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2017. Under this legislation it is a strict liability offence to injure or destroy a bat or to disturb damage or destroy the resting place of a bat.
-

Under this legislation the UK is obliged to fully take into account bats within the planning process and the level of bat activity on-site must be fully assessed prior to the assessment the planning application.

- 1.7. In Britain all wild birds are granted legal protection under the Wildlife & Countryside Act (1981) (as amended). This legislation protects the birds, their eggs and nests whilst being built or in use.

2. Methodology

Desktop Study

Data search

- 2.1. The MAGIC website was accessed to gain information on any statutory site designations within 4 km of the site that are designated for bats.

National Planning Policy

- 2.2. National Planning Policy has been reviewed for policies that relate to nature conservation relevant to the site.

Field Survey

Bat scoping survey

- 2.3. A bat scoping survey was carried out on the 16th July 2024 by Carla Souza, an experienced ecologist and bat worker.
- 2.4. The building was methodically inspected internally and externally for any evidence of roosting bats, including actual bats, droppings, urine staining and evidence of feeding activity such as discarded insect wings and cases.
- 2.5. The building was also assessed for its suitability to support roosting bats by considering several factors including whether bats can access internal and external voids within the building and whether these voids provide adequate protection and shelter for roosting bats. If the building is not confirmed as a roost, it is assessed from High to Negligible Suitability as follows;

- **High Suitability** – many roosting opportunities. Buildings tend to be old, large and rural
- **Moderate Suitability** – some roosting opportunities. Buildings tend to be old, rural with some recent maintenance
- **Low Suitability** – few roosting opportunities. Buildings tend to be modern, urban and well maintained
- **Negligible Suitability** – insignificant roosting opportunities. Buildings tend to be small, modern, urban and very well maintained.

Birds

- 2.6. The building was also inspected for the presence of birds including house sparrow *Passer domesticus*. The building was checked for field signs including nesting material, accumulations of droppings and/or pellets.

Evening emergence/ activity surveys

- 2.7. Two evening emergence/ activity surveys were carried out by two bat surveyors led by experience and licenced bat worker Miguel Canovas. The surveyors were positioned so that all aspects of the building suitable for roosting bats could be observed. The Surveys were undertaken during suitable weather conditions. The emergence surveys commenced at 15 minutes before sunset and continued for two hours. All general bat activity on site was also noted.
- 2.8. Echo meter touch, Peersonic bat detectors and IR cameras were used together with visual observations on flight patterns and feeding behaviour to aid identification to species level. Recordings of bat calls were made and later analysed using dedicated computer software Audacity and wildlife acoustics.

3. Results

Desktop Study

Data Search

- 3.1. The MAGIC website informed that there are no statutory sites within 4 km of the site designated for bats.

Planning Policy

- 3.2. National policy guidance is provided by National Planning Policy Framework (NPPF), which sets out the Government's planning policies for England and how they should be applied to planning applications;

Conserving and enhancing the natural environment

Planning decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Habitats and Biodiversity

When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific

interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Field Survey

Bat scoping survey

- 3.3. The external and internal conditions of the buildings are described in the table below and photographs can be found in Appendix II.
- 3.4. A table within Appendix III; information sheets set out the criteria for the way a building is assessed for its potential to support roosting bats.

Building	Feature	Feature Description	Bat suitability
The Red House, Great Buckland	Overview	Detached single storey house bungalow, with converted loft space. The property is in good condition and is currently unoccupied.	Moderate suitability ☒
	Exterior	Brick rendered walls no gaps or cracks were observed. The windows and doors are all well sealed. There are gaps on the hanging wall tiles around the dormer windows. A maintained lawn garden is present at the front and rear of the dwelling with young and mature peripheral trees.	
	Interior	Areas of living accommodation are composed of rooms with well-sealed rooms with plaster and painted walls and ceilings. The roof void is insulated, composed by exposed timbers and type one bituminous felt lining. Few gaps were observed.	
	Roof	The roof is clad with concrete roof tiles. There are several lifted tiles and gaps on the roof near the dormers.	

Building	Feature	Feature Description	Bat suitability
		The chimney brick work is in good condition, however, there are gaps on the concrete work which seals the chimney to the roof.	
	Barn	A barn/shed is a simple contracted building in average condition with large amount of light spill, rain and wind exposure.	Negligible suitability ☒

Bat emergence surveys

- 3.5. The building was assessed as having moderate suitability for roosting bats. Therefore, two emergence surveys were undertaken on the 25th July and 27th August 2024. The surveys were led by Miguel Canovas CEnv, an experienced ecologist and licenced bat worker.
- 3.6. The table below details the results of the surveys.

Table 2; Bat emergence table

Survey Date	25/07/2024	27/08/2024
Survey Conditions	Cloud: 23% Weather: Dry Wind level 0 / 2 Start temp 13 ⁰ C End temp 12 ⁰ C Sunset time 20.56	Cloud:5% Weather: Dry Wind level 0 / 1 Start temp 17 ⁰ C End temp 15 ⁰ C Sunset time 19.55
Emergence survey	No bat emergence	No bat emergence
General bat activity. Non emergence	21.07 – 22.03 Multiple passes by common pipistrelle <i>Pipistrellus pipistrellus</i> bats seen/ heard foraging around the building and garden trees.	20.02 – 20.57 Multiple passes by common pipistrelle <i>Pipistrellus pipistrellus</i> bat seen/ heard flying around the front and rear garden and across the building.

Birds

- 3.7. No birds or bird nesting activity was recorded in any aspect of the dwelling.

Evaluation

Dwelling

Bats

- 3.8. The site is in a semi-rural area; and lies near to farmland and ancient woodlands, which is likely to function as commuting and foraging resource for different species of bats.
- 3.9. The lifted tiles and other gaps within the roof and roof void, have the potential to offer roosting opportunities for roof void and crevice-dwelling bats, particularly *Pipistrelle sp.*

Emergence / activity surveys

- 3.10. During the bat emergence survey, no bats were recorded either exiting or entering the dwelling, so bats are not considered to be roosting within the building.
- 3.11. The garden of the property is above average in size and contains a range of mature trees and shrubs. During the survey common and soprano pipistrelle and a long-eared bat was observed foraging along the eastern and northern boundary. The garden combined with neighbouring and similar gardens are considered to provide a useful foraging resource for local bats.

Conclusion

- 3.12. The development will not impact on any protected species or habitats.

Barn

- 3.13. The barn is a simple structure with no insulation or wall cavity and no roof void with large amount of light spill, rain and wind exposure. The barn has negligible suitability to roost bats.

4. Recommendations

- 4.1. The recommendations in the paragraphs below are provided to help ensure that wildlife and important ecological features are protected during the course of works. Recommendations also set out mitigation measures to minimise harm where this cannot be avoided and provide compensation measures to allow the proposals to meet current legislative and planning policy objectives.
- 4.2. The Natural Environment and Rural Communities (NERC) Act (2006) states that a public authority must 'in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity; Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.
- 4.3. The NPPF (2021) states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Species recommendations

Bats

- 4.4. All bats within the UK are fully protected under the Wildlife and Countryside Act (1981) as Amended and the Conservation of Habitats and Species Regulations 2017. Under this registration there are strict liability offence to injure or destroy a bat or to disturb, damage or destroy the resting place (roost) of a bat. Under the Bonn Convention, the UK is obliged through the planning system to protect important bat habitats.

- 4.5. Due to the transitory nature of bats, there remains a small possibility that bats could be encountered during demolition works; therefore, all works will proceed under a precautionary approach. Tiles and roof panels will be removed in a vertical rather than horizontal sliding motion. Roof timbers, leadwork, roofing felt, soffits and masonry will be dismantled using a 'soft' approach taking care with cavity walls where present. All site workers will be vigilant at all times and in the very unlikely event that a bat is found, then works must stop immediately and advice should be sought from Crossman Associates or Natural England.

Lighting

- 4.6. The site lies near to leafy areas and ancient woodlands these habitats are likely to support a number of species of bat; typical species that would be likely to be present include common pipistrelle and soprano pipistrelle, therefore any exterior lighting that is to be employed should be of the modern LED-type and should take into account the presence of bats and avoid over illumination of the garden, trees and adjacent properties. This can be achieved by using directional lights and or cowl.

Other species

Birds

- 4.7. All nesting birds are protected under the Wildlife and Countryside Act (1981) (as amended), which makes it an offence to damage or destroy a nest when being built or in use. This legislation has implications for the timing of vegetation clearance and renovation works.

Any clearance works should take place outside of the nesting bird season, which runs from March to September; any works to be carried out within this period will be overseen by an ecologist or an ecological clerk of works (ECoW). Prior to the commencement of works, a thorough check will be made for nesting birds or

dependent young. If birds are found to be nesting and or rearing young, then works in the vicinity will be deferred until young have fledged and left the nest.

Hedgehog

- 4.8. In the UK hedgehogs are listed on schedule 6 of the Wildlife and Countryside Act (1981) as Amended which makes it illegal to kill or capture wild hedgehogs. Hedgehogs are also listed as a species of 'principal importance' under the Natural Environmental and Rural Communities Act 2006, which is meant to confer a 'duty of responsibility' to public bodies.
- 4.9. Excavated holes and trenches on building sites have the potential to trap wildlife including hedgehogs leading to the potential suffering and death of the animal (s) particularly if they become filled with water.
- 4.10. If during the development excavated holes / trenches are likely to be left open, then timber builders' planks should be fitted as ramps to enable any wildlife including hedgehogs a means of escape.
- 4.11. In the case of solid fences being installed, small holes measuring approximately 150 mm x 150 mm should be created at the bases to allow the passage of hedgehogs and other wildlife.

Ecology enhancements

Bats

- 4.12. Is recommended that one bat box is to be installed in a garden tree of the property. The bat box to be approximately 3-4m high in a clear trunk of mature/ young mature tree, facing southwest or southeast, and not near to any artificial light.

Birds

- 4.13. During the construction phase of the development, there is an opportunity to incorporate inexpensive ecological enhancements that aim to increase the biodiversity of the site.
- 4.14. New nesting opportunities will be provided for the local bird population with a particular emphasis on house sparrows (which have suffered significant decline) and it is recommended that a sparrow nest box is installed within the development.
- 4.15. Sparrow nest boxes are ideally fitted below eaves. Suitable models include the Vivara Woodstone Sparrow Nest Box, which is suitable for integral and surface mounting. This model is strong, durable, long lasting and available in brown or stone colour. Models can be found on vivira.co.uk.

5. Limitations

- 5.1. This report records wildlife found during the survey and anecdotal evidence of sightings. It does not record any plants or animals that may appear at other times of the year and were therefore not evident at the time of visit.
- 5.2. The advice contained in this report relate primarily to factual survey results and general guidance only. On all legal matters you are advised to take legal advice.

6. References

Bat Conservation Trust (BCT) *Bats and Lighting in the UK* BCT

HMSO (1981) *Wildlife and Countryside Act 1981 (and subsequent amendments)*. HMSO

HMSO (1995) *Biodiversity*. The UK Steering Group Report

Joint Nature Conservation Committee (JNCC) *Common Standards Monitoring Guidance for Reptiles and Amphibians* (2004) JNCC

Mitchell-Jones, A.J (2004) *Bat Mitigation Guidelines* English Nature

Mitchell-Jones, A.J , & McLeish A.P. (2012) *The Bat Worker's Manual* (4th Edition)

Multi-Agency Geographical Information for the Countryside (MAGIC)
Website at www.magic.gov.uk

Stace, C. (1997) *New Flora of the British Isles 2nd Edition*. Cambridge University Press

TSO (2021) *National Planning Policy Framework*. TSO

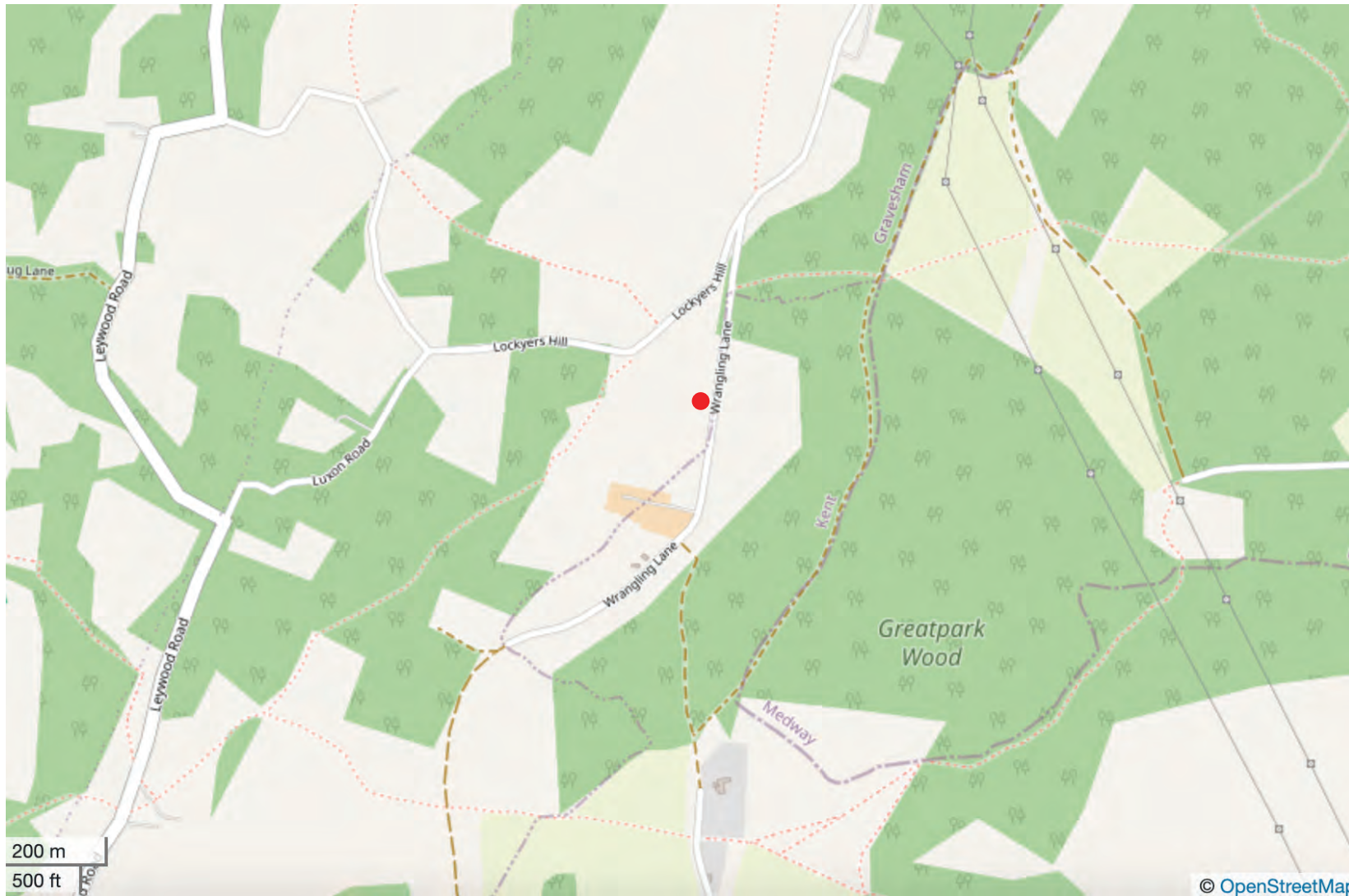
TSO (2006) *Natural Environment and Rural Communities Act* TSO



Appendix I – Site Figures



Site location



Client Mr A Wilson
Title Location plan
Site The Red House,
Figure 1
Date 25 July 2024
Scale xxx



Appendix II – Site Photographs



Site Boundary



Surveyor locations



Bat activity



Client Mr A Wilson
Title Bat survey plan
Site Red House, Great Buckland
Figure 2
Date 02 September 2024
Scale xxx

Photographs 1- 3



Photograph 1:

Front - eastern elevation



Photograph 2:

Back - western elevation



Photograph 3:

Southwestern elevation

Gap details



Photographs 4 - 6



Photograph 4:

Southern elevation

Flash work gap detail



Photograph 5:

Roof void

Gap detail

Bat droppings



Photograph 6:

Barn



Appendix III– Information Sheets

Bat Habitat Suitably Criteria

Bat Roosting Suitability	Criteria	Survey requirement to prove likely absence
Negligible	Negligible habitat features on site likely to be used by roosting bats.	No further survey work required
Low	A building, structure or tree with one or more potential roosting sites that could be used by individual bats opportunistically; however, these possible roost sites do not provide enough space, shelter, protection and/or suitable surrounding habitat to be used by large numbers of bats and are unlikely to be suitable for maternity or hibernation roosts.	One activity survey
Medium	A building, structure or tree with one or more potential roost sites that could be used by bats due to the size, shelter, protection, conditions and surrounding habit, but is unlikely to support a roost of high conservation status.	Two activity surveys
High	A building, structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.	Three activity surveys

Survey requirements are taken from Bat Surveys for Professional Ecologists: Good Practice Guidelines (2016), which is the recognised industry standard guidance used by local planning authorities and other statutory consultees.

Information sheet Artificial bird nesting boxes for Buildings: Swifts, house martins and house sparrows



Habibat house
sparrow nest box



Vivara woodstone sparrow
nest box; suitable for both
integral fitment or surface
mounting

Ibstock Swift boxes are also suitable for house sparrows. Can be customised to suit any exterior finish. Site boxes under eaves, away from windows and direct sunlight.

Sparrow boxes should be grouped together and be at least 2 m of the ground. The boxes can be also be sited on gable walls. At least 3 per averaged size house.

Swifts boxes should be at least 5 m above the ground with an clear un-obstructed flight path.

Schwegler house martin box model 9 b double is a suitable box for house martins and can be used to encourage the uptake of a building by this species. The boxes can be attached to the exterior walls in a sheltered position; ideally beneath the eaves. At least two sets should be placed on an averaged size house.

Ibstock Box



Schwegler model 9b