



ECOLOGICAL ADVICE SERVICE

TO: Alison Webster
FROM: Emma England
DATE: 26 November 2025
SUBJECT: 20250889 / Buckland Farm, Higham

The following is provided by Kent County Council's Ecological Advice Service (KCC EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the county council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application and if sufficient/appropriate ecological information has been provided.

Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the planning officer, who will seek input from the EAS where appropriate and necessary.

SUMMARY: ADDITIONAL INFORMATION REQUIRED

We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. The following information is required prior to determination:

- A discrepancy between the site area within the application form and metric calculations remains. This discrepancy should be clarified to satisfy the LPA that the habitat baseline for the site is accurate prior to determination.

Developer contributions will need to be provided to mitigate for recreational pressure within the zone of influence of designated sites of international importance.

Suggested condition/informative wording is provided in Appendix 1.

Designated Sites

The site is approximately 15m south/west of the Thames Estuary and Marshes Ramsar site and South Thames Estuary and Marshes SSSI. The site falls within two Impact Risk Zones for designated sites and both these risk zones indicate that Natural England should be consulted on the details of this application. We note that Natural England has been consulted and has stated that it is "*not able to provide specific advice on this application*

and therefore has no comment to make on its details...” and “...we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes...”

We advise that the application site falls within the 6km zone of influence of the Thames Estuary and Marshes Special Protection Area and its associated Wetland of International Importance under the Ramsar Convention (Ramsar Site).

This type of development may cause additional recreational disturbance, and likely significant effects on birds using the SPA and Ramsar sites. As such, the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) applies and the applicant will be required to make a tariff payment which is based on the net number of additional dwellings proposed. The payment is to mitigate for additional recreational effects on the designated sites. The local planning authority must ensure that adequate means are in place to secure this mitigation before first occupation.

Gravesham Borough Council must consider the impact the proposal will have on these designated sites in accordance with the Conservation of Habitats and Species Regulations (CHSR) 2017 (as amended) and the National Planning Policy Framework (NPPF) 2024.

A decision from the Court of Justice of the European Union (CJEU: C-323/17) has detailed that mitigation measures cannot be considered when carrying out a screening assessment to decide whether a full ‘Appropriate Assessment’ is needed under the Habitats Directive. Therefore, we advise that there is a need for the local planning authority to carry out an Appropriate Assessment as part of a Habitats Regulations Assessment (HRA).

The local planning authority (the “Competent Authority”) must consult with and take into consideration Natural England’s advice in determining the application. It may be advisable to reconsult with Natural England once the Appropriate Assessment has been produced.

We would also recommend that a construction ecological management plan (CEMP), drainage strategy and wildlife sensitive lighting plan be secured by condition should planning permission be granted. These measures should be included in the Appropriate Assessment to ensure no increased lighting levels within the designated site during construction or operation, and that appropriate pollution prevention controls are in place during construction and operation.

Ecological Impact Assessment

An Ecological Impact Assessment (EclA) has been submitted in support of this application. This document carried out further surveys for great crested newts, breeding and wintering birds, and roosting, commuting and foraging bats. Mitigations, compensations and enhancements were proposed for protected and priority species within the EclA which should be secured by condition should planning permission be granted.

Great Crested Newt

Following the further survey, precautionary working methods have been recommended for great crested newt. These should be secured by condition should planning permission be granted for this application.

Wintering Birds

The wintering bird survey was not carried out in full accordance with professional best practice and has not been fully reported in the submitted EclA. However, the survey results plans have been provided and indicate that the site is of relatively low ecological value for wintering birds. Given the site layout and habitats present, we consider the site relatively low risk with regards to wintering birds and therefore consider the available survey data acceptable.

Breeding Birds

The breeding bird surveys were not conducted in accordance with professional best practice. However, given the current site layout and habitats present, we consider this site relatively low risk for ground nesting birds and species of high conservation importance and consider the survey effort conducted to date acceptable. Nevertheless, birds of conservation interest found to be making use of the site, or within its zone of influence, included Cetti's warbler, at least 5 breeding pairs of house sparrow, 3 breeding pairs of wren and 1 breeding pair of song thrush.

We note that a vegetated buffer has been recommended for breeding Cetti's warbler and that mitigation and compensation for the potential loss of breeding bird habitat can be incorporated into detailed details. Further, additional bird boxes to act as a site enhancement can be included within designs. We recommend that these measures are secured by condition should planning permission be granted.

Bats

A single common pipistrelle was found roosting in Building 1. This is considered likely to be a day roost and a bat mitigation licence will be required from Natural England prior to the removal of Building 1. Updated emergence survey data and a mitigation/compensation strategy should be secured by condition should planning permission be granted.

One tree with bat roosting suitability is currently due for removal as part of the scheme. Precautionary working methods should be carried out prior to and during tree removal.

Lost roosting features should be compensated for within the scheme's design with additional roosting features in the form of bat boxes provided on new buildings.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications¹ for development (unless exempt^{2,3},) must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

¹ All planning applications for major development (unless exempt) submitted on or after 12th February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2nd April 2024.

² Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

³ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

Having reviewed submitted information⁴, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development. We consider there is no local policy biodiversity net gain requirement above 10% for this development.

We have produced the following table to aid the local planning authority in ascertaining whether sufficient BNG information has been submitted:

Table 1: To show whether the applicant has met the minimum validation requirements

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	Yes	
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate) .	Yes	A preliminary ecological appraisal was carried out 26 th January 2025. Given the nature of the site and findings during the survey, this is considered acceptable to inform the application.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	-	-
The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value.	Yes	<p>The site is 1.68 hectares in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool (1.65 ha) does not match the reported red line boundary site area as per the application form. There is a small discrepancy of 300 square metres.</p> <p>This small discrepancy should be clarified prior to determination to ensure the baseline habitat calculations for the site are accurate. We note that a revised biodiversity metric calculation tool has been submitted. However, this document still shows 1.65 ha. We are not aware that the discrepancy, which is well above the de-minimis habitat area has been justified/clarified.</p> <p>Proposed post-development habitats appear realistic and achievable.</p>
<p>A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value (‘degradation’), and where they have:</p> <ul style="list-style-type: none"> a statement to the effect that these activities have been carried out; 	Yes	None reported and none visible on aerial imagery (Google Earth Pro, accessed 30 th October 2025).

⁴ References to the biodiversity value of any habitat or habitat enhancement within this section of the advice note refer to the value as calculated in accordance with the biodiversity metric.

<ul style="list-style-type: none"> the date immediately before these activities were carried out; the pre-development biodiversity value of the onsite habitat on this date; the completed metric calculation tool showing the calculations, and any available supporting evidence of this. 		
A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date).	-	None reported.
Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).	Yes	

The habitat baseline must be correct prior to determination, but full details of how the proposals will deliver biodiversity gains are not strictly required until submission of the pre-commencement Biodiversity Gain Plan. However, it is advisable to seek an indication prior to determination as, it gives an indication of how the biodiversity gain hierarchy will be applied, and if granted consent, the project cannot commence until this information has been submitted to and approved by the local planning authority. This information will also provide sufficient indication as to how conditions need to be applied should planning permission be granted for this application.

Information has been submitted with this application to give confidence that the biodiversity gain hierarchy can be effectively applied to this application, and how conditions can be applied should planning consent be granted.

A summary of our review of the submitted biodiversity net gain information is provided below.

Table 2: To show a summary of our review of submitted biodiversity net gain information

Percentage Net Gain Required	Percentage Net Gain/Loss Reported for Area Habitats	Percentage Net Gain/Loss Reported for Linear Habitats	Net Gain Proposed: 1 – all on-site; 2 – no significant on-site and off-site; 3 - significant on-site and off-site	On-site 'significant' Net Gains Proposed (Yes/No)
10%	+31.15%	+10.12%	1 – all on-site	Yes

Significant On-site Gains

Significant on-site gains are areas of habitat creation or enhancement which contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development. Retention of existing habitat cannot count as an on-site significant gain.

Non-significant enhancements are those whose loss will not significantly decrease the development's biodiversity value e.g., private gardens or container planting. These types of enhancements do not normally require maintenance provisions and so no Habitat Management and Monitoring Plan, legal agreement or commitment to maintain them is required.

We consider the creation of various habitats on-site to constitute significant⁵ on-site gains. Government guidance states: *"The maintenance of these significant enhancements must be secured with a legal agreement (planning obligation or conservation covenant) or planning condition for 30 years in the same way as off-site gains. LPAs will consider the most appropriate mechanism and this will need to be agreed at the planning permission stage."*⁶

It is our view that these significant on-site gains should be subject to a S106 agreement or conservation covenant to secure a monitoring fee and ensure enforceability over a 30-year period. It is our view that monitoring fees should be secured for these significant on-site gains as these gains will need to be subject to monitoring reports across 30 years, which will need to be reviewed (and acted upon as necessary) by the LPA at their own cost. We provide details of suggested monitoring fees in our March 2025 advice note 'KCC Ecological Advice Service suggested BNG Monitoring Fees' which has been distributed to all LPAs in Kent.

Additionally, we recommend conditions for a habitat management and monitoring plan and monitoring reports to secure the significant on-site gains. We also recommend that the conditions secure the retention of the proposed retained trees, woodland, and pond. Although, the retention of existing habitat cannot count as on-site significant habitat, the relevant retained habitats are recommended to be secured as well as the relevant created and enhanced habitats as without the retained habitats the 10% biodiversity net gain would not be achieved. Furthermore, there are national and local policies in place to conserve biodiversity.

Table 3, Appendix 2 takes elements from the national and local guidance to show how we have calculated the significance of habitats on-site. This site would not qualify for use of the small sites metric.

Emma England
Biodiversity Officer

This response was submitted following consideration of the following documents:

Fryer, J. (September, 2025) Application for Outline Planning Permission with some matters reserved. PP-14195546. Bucklands Farm, Chalk Road, Higham.

RammSanderson (August 2025) BIA Baseline Habitat Plan. Chalk Road, Higham.

RammSanderson (August 2025) BIA Proposed Habitat Plan. Chalk Road, Higham.

⁵ We have recently drafted an advice note titled ['Defining significant onsite enhancements for Biodiversity Net Gain in Kent and Medway'](#) (February 2025) which outlines our definition of 'significant'. However, this document is awaiting a revision whereby reference to retained habitats counting as on-site significant habitats will be removed.

⁶ [Make on-site biodiversity gains as a developer - GOV.UK](#)

RammSanderson (June 2025) Preliminary Ecological Appraisal Report (PEAR). Chalk Road, Higham.

RammSanderson (November 2025) Ecological Impact Assessment. Chalk Road, Higham.

Saunders (July 2025) Location Plan. Land off Chalk Road, Lower Higham.

Appendix 1 – Suggested Condition/Informative Wording

Biodiversity Net Gain

Deemed Condition

Please note that certain information is required to discharge the biodiversity gain condition. The government's published Biodiversity Gain Plan (BGP) template¹² should be submitted with the application to discharge the biodiversity gain condition. This template also indicates which other documents and plans should support the application for discharge.

If planning permission is granted, the statutory biodiversity gain condition (and its reason for imposition) should not be included on decision notices as a condition. The condition cannot be varied or removed. An application must be made to discharge it as any other condition.

We recommend an informative in line with the Planning Practice Guidance (Paragraph: 026 Reference ID: 74-026-20240214)¹² should be included on the decision notice to set out the legislative requirements in relation to biodiversity net gain.

Habitat Management and Monitoring Plan

The below condition is recommended as the scheme must set out the actions needed to create and enhance habitat on-site as well as maintain it for 30 years from the "completion of development"⁶ (Paragraph 9(3) of Schedule 7A of the Town and Country Planning Act 1990).

Neither the statutory definition of the biodiversity gain plan⁷ nor the current DEFRA biodiversity gain plan template require management and maintenance measures to be specified⁸. As a result, the statutory condition does not on its own secure compliance with the approved biodiversity gain plan (including the implementation of any habitat creation and enhancement works or their maintenance for a 30-year period). The delivery of the gain envisaged by the HMMP needs to be secured by condition or, where necessary, legal agreement.

The suggested condition wording below also includes reference to habitat retention. Retention of existing habitat cannot count as on-site significant habitat. Only created and enhanced habitats can count as on-site significant habitats. However, the retained habitats are recommended to be secured as well as the created and enhanced habitats as without the retained habitats the 10% biodiversity net gain would not be achieved. Furthermore, there are national and local policies in place to conserve biodiversity.

Suggested Condition Wording:

The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan, and based on the most up-to-date and/or relevant ecology surveys as determined by a suitably qualified ecologist, has been submitted to, and approved in writing by, the local planning authority and including:

- a. a non-technical summary;*
- b. the roles and responsibilities of the people or organisation(s) delivering the HMMP;*

- c. *the planned habitat retention, creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan and Ecological Design Strategy;*
- d. *the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development and maintain the habitat in accordance with the Ecological Design Strategy for the life-time of the development; and*
- e. *the monitoring methodology and frequency in respect of the retained, created or enhanced habitat to be submitted to the local planning authority.*

The retained, created and/or enhanced habitat specified in the approved HMMP shall be implemented, managed, maintained and monitored in accordance with the approved HMMP. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Reason: To ensure the development delivers the required biodiversity net gain on site in accordance with [local policy reference] and Schedule 7A of the Town and Country Planning Act 1990.

Monitoring Reports

To ensure the proposed biodiversity net gain is achieved, we recommend a condition for the submission of monitoring reports to the local authority to help ensure target habitats and their associated conditions are meeting their goals should planning permission be granted.

The conditions enable monitoring of the delivery of the BNG needs to align with any monitoring fees required through S106 agreement. Monitoring fees may be required by the Local Planning Authority to enable the effective resourcing of the delivery and management of BNG.

Suggested Condition Wording:

Monitoring reports demonstrating that the development is achieving the targeted biodiversity net gain in the approved biodiversity gain plan shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP. Remedial measures, if required, shall be specified within an updated HMMP submitted for approval in writing by the local planning authority at the same time as the submission of each monitoring report.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with [insert policy] and Schedule 7A of the Town and Country Planning Act 1990.

Ecological Features

Construction Ecological Management Plan (CEMP)

The National Planning Policy Framework (NPPF) 2024, paragraph 187, indicates that “*planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and providing net gains for biodiversity...*”

We suggest that the below wording is included as a condition for a Construction Ecological Management Plan (CEMP – biodiversity) if planning permission is granted. This shall mitigate for impacts to biodiversity and help ensure compliance with relevant legislation.

We advise that the below suggested wording does not cover all aspects usually covered within a Construction Environmental Management Plan (CEMP) (such as pollution control, noise, lighting etc. during construction). Therefore, this wording should either form part of any larger CEMP / Construction Management Plan (CMP) condition required or should form a separate stand-alone condition for a Biodiversity Method Statement.

Suggested Condition Wording:

No development shall take place (including any ground works, site or vegetation clearance) until a construction ecological management plan (CEMP - biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP - biodiversity) shall include the following and be based on the submitted Ecological Impact Assessment by RammSanderson, dated 4th November 2025 and up-to-date ecological survey information, as advised by a suitably qualified ecologist:

- Purpose and objectives for the proposed works:*
- The identification of biodiversity protection zones and the use of protective fences, exclusion barriers and warning signs;*
- Detailed design(s) and/or working method(s) necessary to achieve stated objectives;*
- Extent and location of proposed works (including receptor areas(s) in case animals are encountered during development) shown on appropriate scale maps and plans for all relevant species and habitats;*
- Reference to the relevant protected species licences (e.g., bats) to be obtained in advance of site clearance/construction and any relevant mitigation measures required;*
- Reference to or inclusion of a detailed arboricultural method statement to protect retained trees;*
- Timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;*
- Persons responsible for implementing the works, including times during construction when specialist ecologists need to be present on site to undertake / oversee works;*
- Disposal of any wastes for implementing work.*

The works shall be carried out in accordance with the approved details for the duration of site and/or vegetation clearance and construction.

Reason: To protect habitats and species identified in the ecological surveys from adverse impacts during construction.

Ecological Design Strategy

This condition should be used in conjunction with a construction ecological management plan (CEMP – biodiversity). The CEMP – biodiversity should deal with impacts during construction, whereas this condition should focus on tackling avoidance, mitigation, compensation and enhancement measures through design, including via production of detailed design plans and a landscape and ecological management and monitoring plan.

Suggested Condition Wording:

No development (including any ground works, site or vegetation clearance) shall commence until an Ecological Design Strategy (EDS) has been submitted to, and

approved in writing by, the local planning authority. The EDS shall align with the Biodiversity Gain Plan, and be based on the submitted Ecological Impact Assessment by RammSanderson, dated 4th November 2025 and up-to-date ecological survey information, as advised by a suitably qualified ecologist. The EDS shall include the following:

- Purpose and conservation objectives for the proposed works to avoid, mitigate, and compensate for impacts to protected and priority species and habitats as a result of the development and to provide a net positive for biodiversity;*
- Review of site potential and constraints;*
- Detailed designs shown on scaled plans to achieve stated objectives, including detailed soft landscaping plans, planting schedules, and habitat features shown on building elevation plans, soft landscaping plans, fencing plans etc. as appropriate;*
- Details of the precise location (including erection height from ground level and aspect), dimensions, construction materials (including make and model where relevant) and construction methodology of habitat features;*
- Bat and bird boxes made of durable materials and targeted at species of conservation concern that could make use of the site;*
- Hedgehog highways through the network of gardens across the site. These highways need to be sufficient in number, hole size (13cmx13cm) and labelling to secure retention and use during operation of the development;*
- Type and source of materials to be used where appropriate, e.g. native species of local provenance;*
- Timetable for implementation demonstrating that works are aligned with the proposed phasing of development;*
- Persons responsible for implementing the works; and*
- Reference to the HMMP and appropriate management measures to secure the suitability of the site for the life-time of the development, for the relevant protected and priority species and habitats.*

The EDS shall be implemented in accordance with the approved details and all features shall be retained thereafter.

Lighting

To mitigate against potential adverse effects of lighting on biodiversity (including bats and birds), the Bat Conservation Trust/Institute of Lighting Professionals's 'Guidance Note 8 Bats and Artificial Lighting at Night' (or subsequent updates) should be consulted in the lighting design of the development.

We advise that the incorporation of sensitive lighting design for biodiversity is submitted to the local planning authority and secured via an attached condition with any planning permission.

Suggested Condition Wording:

Prior to commencement of works above slab level, a lighting plan which has been designed to minimise impacts on biodiversity shall be submitted to and approved in writing by the local planning authority. Details of any proposed external lighting shall accord with the Bat Conservation Trust/Institute of Lighting Professionals 'Guidance Note 08/23: Bats and Artificial Lighting at Night' and include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) as well as ISO lux plan(s) showing light spill. It shall be clearly demonstrated that areas to be lit shall not impact protected species or their habitats. All

external lighting shall be installed in accordance with the specifications and locations set out in the approved plan and be maintained thereafter.

Reason: To limit the impact of light pollution from artificial light in accordance with the NPPF 2024, paragraph 198(c). With consideration for bats and other nocturnal wildlife in accordance with the NPPF 2024, paragraph 187(d).

Appendix 3: On-Site Significance Calculator

Table 2: On-site Significance of Habitats Calculator

Row No.	On-site Habitat	Present (Y/N)	No. of Habitat Area Units	No. of Hedge Units	Comments
1	Created habitats of medium distinctiveness	Y	0.5 + 0.3542 = 0.8542		
2	Created habitats of high distinctiveness	N	-	-	-
3	Created habitats of very high distinctiveness	N	-	-	-
4	Created habitats of low distinctiveness making up many biodiversity units (BU) relative to biodiversity value pre-development	Y	0.78	0.43	<p>Local guidance indicates that low distinctiveness habitats are considered significant where, in total, created low distinctiveness units are 10% or more of the baseline BU value of the site <u>AND</u> the total number of units delivered is above 0.5.</p> <p>The pre-development total habitat area units are reported to be 3.05.</p> <p>The pre-development total hedge units are reported to be 0.78.</p> <p>The total pre-development biodiversity unit value is 3.83. The total created biodiversity unit value is 1.21. The total created biodiversity unit value is 32% of the pre-development biodiversity unit value.</p>
5	Created habitats have increased distinctiveness compared to pre-development (e.g., modified grassland to other neutral grassland)	Y	-	-	The creation of other neutral grassland has greater distinctiveness than modified grassland.
6	There have been enhancements proposed to the raise the distinctiveness of retained habitats.	N	-	-	-
7	There have been enhancements proposed to the condition of retained habitats	N	-	-	-
8	Habitat creation or enhancement of low distinctiveness habitats or higher is significant in	Y	-	-	Site is 1.65 ha and relevant habitat creation/enhancement is across 0.4646 ha (28% of the site).

	area relative to size of development (excluding individual trees and vertical habitats).				
Total biodiversity habitat units (BU) delivered by relevant creation/enhancement action: 2.0642					
The above table indicates that the on-site habitat is considered significant because of the creation of modified grassland, sustainable urban drainage features, other neutral grassland, and the planting of trees and hedgerows.					

* National guidance indicates that significant enhancements contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development e.g.,:

- o Habitats of medium or higher distinctiveness in the biodiversity metric;
- o Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development;
- o Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development;
- o Areas of habitat creation or enhancement which are significant in area relative to the size of the development;
- o Enhancements to habitat condition.

** In Kent, guidance indicates that the delivery of above 0.5 (total) relevant biodiversity units is considered the threshold for on-site significance for created or enhanced habitats.

*** Private gardens and container planting are not considered significant enhancements in national guidance and have not been included in the above table.

**** Cropland habitats (except arable field margins, and winter stubble where providing mitigation/compensation for wintering birds), Rhododendron scrub, introduced shrub and culverts cannot be considered significant enhancements in local guidance and have not been included in the above table.