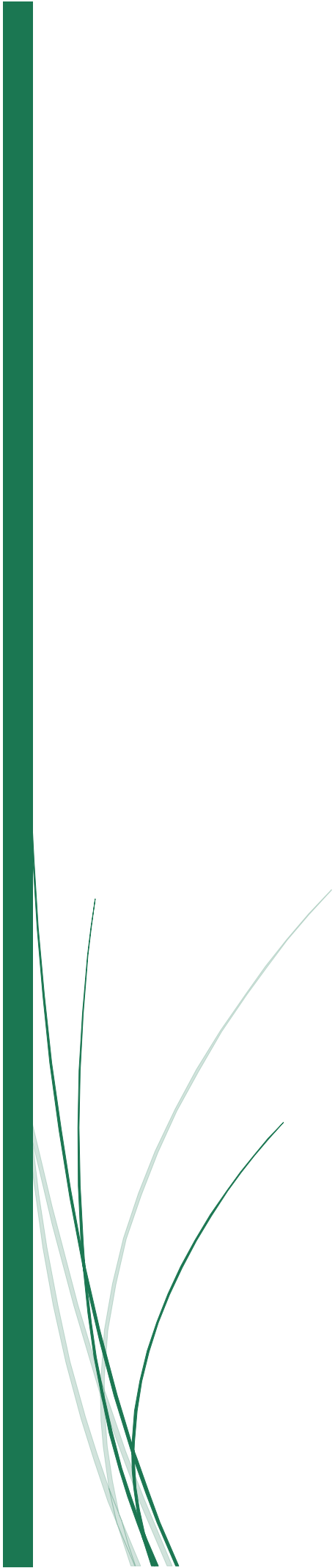




Golden Lion Garden, Brookers Farm, Luddesdown Rd, Luddesdown, Gravesend Kent DA13 0XE

Preliminary Ecological Appraisal

A Report for DHA

March 2026



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Preliminary Ecological Appraisal

Client:	DHA	
Project Ref:	Golden Lion Garden	
Report Ref:	J26-000014	
Author:	Technical Review:	Approved:
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Disclosure:		
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1 PROJECT OVERVIEW

Client: DHA

Site Address: Golden Lion Garden, Brookers Farm, Luddesdown Rd, Luddesdown, Gravesend Kent DA13 0XE

Attending Ecologists: Ashley Walker BSc (Hons) MSc, Ecologist
Ryan Richardson BSc (Hons) MSc (Hons), Ecologist & Technical Data Lead

Survey Date(s): 26th January 2026

Site Proposals: Expansion of the pub garden, inclusion of a new footpath and HGV access to the winery.

Associated Planning Reference Number: Not yet submitted.

Source of Relevant Documents:

Document:	Source:
Application Boundary:	DHA. Existing Site Layout Plan. Drawing Ref: DHA/35449/02 Rev B
Site Location Plan:	Google Earth Pro
Desk Study:	Kent & Medway Biological Records Centre (KMBRC) Magic Map (Magic.defra.gov.uk)
Proposed Development:	DHA. Proposed Site Layout Plan. Drawing Ref: DHA/35449/03

2 NON-TECHNICAL SUMMARY

- 2.1 In response to the proposed development at Golden Lion, Gravesend ('the Site'), a Preliminary Ecological Appraisal of land within the redline boundary (Figure 1) has been undertaken.
- 2.2 The Site occupies 0.16ha and comprises two buildings, grounds and car park, and areas of hardstanding.
- 2.3 Development of the Site will not impact designated sites or areas of ancient woodland. Recommendations have been provided to protect an area of deciduous woodland, a Habitat of Principal Importance (HPI) as listed on s41 of the Natural Environment and Rural Communities (NERC) Act 2006, located 5m west of the Site.
- 2.4 Retained trees should be protected in accordance with BS 5837:2012 'Trees in relation to design, demolition and construction.'
- 2.5 No evidence of badger was recorded. However, the habitats present are optimal for foraging and commuting badgers, therefore, precautionary working methods are required during construction.
- 2.6 Further assessment of tree T5 in regards to bat suitability is required, if this tree is to be affected by the proposed development.
- 2.7 Building B1 has 'Low' suitability to support roosting bats. The building is to be demolished under a separate planning application (ref: 20250053) which has already been approved, therefore is excluded from this planning application.
- 2.8 Mitigation to protect nesting birds and dormice is required.
- 2.9 The grassland and gardens should be maintained to current sward levels to ensure they do not become suitable for great crested newts or reptiles before or during the development.
- 2.10 Proposed biodiversity enhancements for the Site, in accordance with the requirements of the National Planning Policy Framework (NPPF) 2024, include:
- Installation of a tree-mounted bird box on a retained tree
 - Installation of a tree-mounted bat box on a retained tree
 - Incorporation of a log and brash pile at a suitable location
 - Installation of an insect house at a suitable location

- 2.11 Provided the recommendations set out within this report are implemented, the proposed development will not contravene any relevant legislation or planning policies pursuant to nature conservation.

3 INTRODUCTION

3.1 Context

- 3.1.1 In response to a proposed development at Golden Lion, Brookers Farm, Luddesdown Rd (hereafter referred to as 'the Site'), a Preliminary Ecological Appraisal (PEA) of land within the redline boundary was undertaken (see UKHab Habitats Plan, Figure 1).
- 3.1.2 The Site's suitability to support protected and/or notable species and habitats was assessed and appropriate recommendations of further surveys and mitigation, where required, are provided within Section 6 of this report, and opportunities for biodiversity enhancements in-line with the NPPF 2024 are presented in Section 7. Ecological features of interest are depicted in Figure 1: UKHab Habitats Plan and photographs of the Site are provided in Appendix A.

3.2 Site Location

- 3.2.1 The Site is in a rural location, north of the village of Luddesdown, in the Gravesham district of Kent. It is at National Grid Reference: TQ 67209 66643. The location of the Site is depicted in Image 1, below.



Image 1 – Geographical Location of the Golden Lion ('the Site')

3.3 Site Description

- 3.3.1 The Site occupies approximately 0.16ha and comprises grassland, individual trees and areas of hardstanding.

- 3.3.2 The Site is bounded by Luddesdown Road to the north and west, the winery buildings and car park to the east, and staff car park to the south. The wider landscape is rural in nature, with agricultural fields and large blocks of woodland.

3.4 Legislation and Planning Policy

- 3.4.1 Relevant legislation and policies that apply to ecological issues within the Site are:

- [The Conservation of Habitats and Species Regulations 2017 \(as amended\)](#)
- [The Environment Act 2021](#)
- [The Wildlife and Countryside Act 1981 \(as amended\)](#)
- [The Countryside Rights of Way Act 2000](#)
- [The Natural Environment and Rural Communities \(NERC\) Act 2006](#)
- [Hedgerows Regulations 1997](#)
- [The Protection of Badgers Act 1992](#)
- [The Wild Mammal \(Protection\) Act 1996](#)
- [The National Planning Policy Framework \(NPPF\) 2024](#)
- [Government Circular 06/05](#)
- [Gravesham Local Plan Core Strategy \(Adopted September 2014\)](#)

- 3.4.2 The above summary serves as guidance only. Further information is presented in Appendix B.

3.5 Objectives of the Survey

- 3.5.1 The objectives of the survey were to:

- Classify the main habitats present within the Site.
- Evaluate the ecological importance of these habitats.
- Assess the suitability for protected species and any otherwise notable species to occur within the Site.
- Provide appropriate recommendations for further surveys and mitigation where required, as well as opportunities for biodiversity enhancement.

4 METHODS

4.1 Desk Study

4.1.1 A desk study was undertaken in January 2026 to determine the presence of designated sites and habitats of conservation importance, as well as freely available European Protected Species records.

4.1.2 The following bodies were consulted for the desk study:

- Google Earth Pro for aerial imagery.
- Magic Map (Magic.defra.gov.org) for records of statutory designated sites; European Protected Species Mitigation Licences (EPSMLs); and great crested newt (GCN) pond survey data and class licence returns.
- Kent Landscape Information System (KLIS) for non-statutory designated sites
- OS mapping for ponds within 250m of the Site.

4.1.3 The desk study involved obtaining the following information:

- International statutory designated sites within 5km.
- National statutory designated sites within 1km.
- Non-statutory designated sites within 1km.
- EPSMLs and GCN pond survey data and class licence returns within 1km.
- Ancient woodland parcels within 30m.
- Waterbodies within 250m.
- Habitats of Principal Importance (NERC Act 2006) within or immediately adjacent to the Site.

4.1.4 These search areas are considered sufficient to cover the potential zone of influence of the proposed development.

4.2 Habitats

UKHab Survey

4.2.1 The Site was surveyed using the methods outlined in '[The UK Habitat Classification, Version 2.0](#)' (UKHab Ltd, 2023). The techniques applied during the survey involve identifying the main plant communities present on the Site and classifying the habitat types following the UKHab methodology. This technique provides an inventory of the basic habitat types present and enables areas of greater botanical interest which may require further, more detailed, surveys to be identified.

- 4.2.2 Any occurrences of recognised invasive species as listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were also noted, if present.
- 4.2.3 A map of the habitats and areas of interest is provided in Figure 1. Photographs of features of interest are presented in Appendix A.
- 4.2.4 The survey was undertaken by GES Ecologist Ashley Walker and GES Ecologist Ryan Richardson on 26th January 2026.

4.3 Protected and Notable Species

- 4.3.1 The survey was extended to consider the suitability of the Site to support protected and notable species. Species considered included those considered appropriate by the surveyor during the survey. Detailed surveys were not completed for these species. However, based on an understanding of species ecology, consideration was given to the Site's potential to provide sheltering or foraging habitat and/or connectivity from other areas of potentially suitable habitat to allow dispersal between populations. Core species considered during the survey are outlined below.

Badger

- 4.3.2 Evidence of badger *Meles meles* activity within (and, where possible, within 30m of) the Site was assessed by searching for signs such as:
- Presence of setts, indicated by suitably sized holes or burrows.
 - Evidence of badger latrines, badger hair and/or footprints.
 - Evidence of well-used runs supported by secondary evidence such as foraging signs.

Bats

Foraging and Commuting Habitat Assessment

- 4.3.3 An assessment of suitable foraging, commuting, roosting and swarming habitat for bats both within the Site and adjacent habitats was carried out in accordance with current Bat Conservation Trust (BCT) good practice guidance (Collins, 2023). The presence of features suitable for bat foraging or commuting was noted and the assessment enabled the Site and surrounds to be categorised as having either 'none,' 'negligible,' 'low,' 'moderate,' or 'high' suitability for bats.

Ground Level Tree Assessment (GLTA)

- 4.3.4 A GLTA of trees within the Site, was carried out in accordance with current BCT good practice guidance (Collins, 2023). Trees were inspected for potential roosting features (PRFs) such as splits, fissures, cavities, delaminated bark, heavy ivy *Hedera* sp. cover and woodpecker holes.

Evidence such as droppings, staining and bats themselves were searched for below and (where possible) in suitable features, with the use of high-powered torch, telephoto lens camera and binoculars (where necessary). Each tree was categorised as having:

- PRFs suitable for individual bats (PRF-I)
- PRFs suitable for multiple bats (PRF-M)
- Further assessment required (FAR)
- No PRFs.

4.3.5 The above information was used to determine the level (if any) of further surveys required in respect of tree-roosting bats.

Preliminary Roost Assessment

4.3.6 A full external and internal inspection (where possible) was undertaken of all the buildings present within the Site, with the use of high-powered torch, ladder and binoculars (where required). Any suitable roosting or access points for bats such as raised fascia boards, missing/lifted tiles, cracks or crevices in brick/blockwork and gaps in soffit boxes were searched for and inspected for evidence of use by bats (staining, droppings, scratch marks, or the bats themselves). The results of the scoping survey enabled the buildings to be categorised as having either 'none,' 'negligible,' 'low,' 'moderate,' or 'high' suitability for roosting bats. Should evidence of bats be recorded, the building would also be categorised as a 'confirmed' roost.

4.3.7 The above information was used to determine the level (if any) of further surveys required in respect of bat roosts in buildings.

Dormouse

4.3.8 The Site was surveyed for suitable hazel dormouse *Muscardinus avellanarius* habitat, such as the presence of well-connected broadleaved woodland, hedgerows, mature scrub and suitable food sources such as oak *Quercus sp.*, hazel *Corylus avellana* and other nut-bearing trees, fruiting trees and shrubs and flowers. A search of dormouse-gnawed nuts and tightly woven nests was also included in the survey.

Great Crested Newts (GCN)

Terrestrial Habitat Assessment

4.3.9 Any suitable terrestrial habitat for great crested newts (GCN) *Triturus cristatus* was searched for, including long grass, tall ruderal, woodland and hedgerow borders, as well as wood and rubble piles that act as sheltering places.

Habitat Suitability Index (HSI)

4.3.10 Where access was available, an assessment of the suitability of each waterbody within 250m of the Site to support GCN was undertaken using a simplified version of the HSI assessment methodology developed by Oldham *et al.* (2000) (ARG, 2010). The HSI incorporates ten suitability indices, all of which are factors considered to affect GCN:

- Location (in Britain)
- Pond area
- Desiccation rate (years out of ten that pond dries)
- Water quality (subjective assessment)
- Percentage of pond shade
- Presence of waterfowl
- Fish population (subjective assessment)
- Number of ponds within 1km
- Terrestrial habitat quality
- Percentage macrophyte cover

4.3.11 The results of the HSI provide a numerical index of between 0 and 1, whereby 0 indicates potentially unsuitable habitat and 1 indicates potentially optimal habitat. The details of the HSI scoring criteria are provided in Table 1. The location of waterbodies within 250m of the Site is shown in Figure 2: Waterbodies within 250m, and the full HSI results are provided in Appendix C.

Table 1 – HSI Scoring Criteria

HSI Score	Pond Suitability for GCN
<0.50	Poor
0.50 – 0.59	Below Average
0.60 – 0.69	Average
0.70 – 0.79	Good
>0.80	Excellent

Reptiles

4.3.12 The Site was assessed for any suitable habitat for reptiles, including long grass, vegetated boundaries, woodland and hedgerow borders, as well as wood and rubble piles that provide sheltering opportunities.

Nesting Birds

- 4.3.13 The habitats within the Site were assessed for their suitability to support nesting birds. Factors considered include suitable cover and feeding habitat. Evidence was searched for in the form of any active or disused birds' nests.

4.4 Constraints*PEA*

- 4.4.1 The survey was carried out outside the optimal period for conducting UKHab surveys (generally considered to be April to September inclusive) and therefore certain plant species may not have been recorded during the survey. However, the habitats within the Site were intensively managed amenity habitats. Therefore, the level of information gathered during this survey is sufficient to effectively evaluate the habitats within the Site, and this does not pose a constraint to the survey findings.
- 4.4.2 Any measurements or indications of area provided within this report are estimates and are provided as a guide only.

5 RESULTS

5.1 Desk Study

Designated Sites

- 5.1.1 Statutory and non-statutory designated sites identified within the potential zone of influence of the proposed development are presented in Table 2 below.

Table 2 – Designated Sites within ZOI of the development

Site Name	Description	Distance and Orientation from Site
Statutory Designated Sites		
Internationally Designated Sites (Ramsar) & UK National Site Network (SPA, SAC)		
North Downs Woodland (SAC)	<i>Semi-natural dry grasslands and scrubland facies: on calcareous substrates for which the area is considered to support a significant presence. Asperulo-Fagetum beech forests for which this is considered to be one of the best areas in the United Kingdom. Taxus baccata woods of the British Isles for which this is considered to be one of the best areas in the United Kingdom.</i>	880m SE
Nationally Designated Sites (SSSI, NNR, LNR)		
North Kent Woods and Downs NNR	<i>Network of protected sites. Ancient woodlands, chalk grasslands.</i>	Several parcels. Closest is 200m N
Halling to Trottiscliffe Escarpment SSSI	<i>A mosaic of habitats is present at this site with areas of grassland, scrub and various types of woodland. The site is representative of Chalk grassland in west Kent and beech woodland on the chalk. Outstanding assemblages of plants and invertebrates are present.</i>	775m E
Non-statutory Designated Sites		
Henley Wood & Pasture LWS	<i>Contains ancient woodland and deciduous woodland habitats. No details provided.</i>	350m W
Pasture and woods south of Luddesdown LWS	<i>Contains lowland calcareous grassland, ancient woodland and deciduous woodland. No details provided.</i>	680m S

(SPA – Special Protection Area, SAC – Special Area of Conservation, SSSI – Site of Special Scientific Interest, NNR – National Nature Reserve, LNR – Local Nature Reserve, LWS- Local Wildlife Site)

SSSI Impact Risk Zones (IRZs)

- 5.1.2 The Site lies within the IRZ of Halling to Trottiscliffe Escarpment SSSI, Cobham Woods SSSI, Great Crabbles Wood SSSI, and Shorne and Ashenbank Woods SSSI and any Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that these SSSIs underpin.

Ancient Woodland

- 5.1.3 The desk study returned no records of ancient woodland parcels within 30m of the Site.

NERC s41 Habitats of Principal Importance (HPI)

- 5.1.4 The desk study returned no record of a habitat listed under s41 of the NERC Act 2006 within or adjacent to the Site. However, 'Deciduous Woodland' is present approximately 5m west of the Site, separated from the Site by Luddesdown Road.

European Protected Species Mitigation Licences (EPSML) and GCN surveyed ponds and class licence returns

- 5.1.5 The desk study returned no records of EPSML sites or GCN records within 1km of the Site.

5.2 Habitats*UKHab Survey*

- 5.2.1 The following habitat types were recorded within the Site on 26th January 2026:

- Modified grassland
- Native hedgerow
- Non-native and ornamental hedgerow
- Rural Trees
- Vegetated garden
- Artificially unvegetated, unsealed surface
- Developed land; sealed surface (Hardstanding)
- Developed land; sealed surface (Buildings)

- 5.2.2 A summary of the key botanical species present within each habitat type is included within the descriptions below. While considering this information, reference should be made to the UKHab Habitats Plan presented in Figure 1 and photographs presented in Appendix A.

Modified Grassland

- 5.2.3 Two parcels of modified grassland were recorded. Both parcels have a sward length of less than 10cm, with the majority being less than 5cm.
- 5.2.4 Quadrats taken in MG1, in the north of the Site, found the grassland to be dominated by perennial rye-grass *Lolium perenne*, with occasional red fescue *Festuca rubra*, cleavers *Galium aparine*, black medick *Medicago lupulina* and daisy *Bellis perennis*. Occasional white clover *Trifolium repens* and common bent *Agrostis capillaris* are also present within the grassland.
- 5.2.5 The grassland along the east of the Site, MG2, is also dominated by perennial rye-grass and contains occasional red fescue.

Native Hedgerow

- 5.2.6 A single native hedgerow (H2) exists in the south of the Site. Regularly managed and 1.5m in height, 1m in width and 14m in length, the feature is formed of dominant blackthorn *Prunus spinosa* and rarely occurring Chinese barberry *Berberis julianae*. The base of the hedgerow is a short sward grassland.

Non-native and Ornamental Hedgerow

- 5.2.7 A single non-native and ornamental hedgerow (H1) exists within the vegetated garden. Unmanaged and 5m in height, 1.5m in width and 41m in length, species present include frequent western red-cedar *Thuja plicata* and cherry laurel *Prunus laurocerasus*, and rarely occurring butterfly-bush *Buddleja davidii*, juniper *Juniperus communis*, holly *Ilex aquifolium*, wild cherry *Prunus avium* and evergreen spindle *Euonymus japonicus*. The base of the hedgerow is a short sward grassland.

Rural Trees

- 5.2.8 Eight trees are present on Site, or immediately adjacent to the Site boundary. Species present include wild cherry, western red-cedar, field maple *Acer campestre*, beech *Fagus sylvatica*, and apple *Malus domestica*. All are present within vegetated garden and modified grassland.

Vegetated Garden

- 5.2.9 An area of grassland in the centre of the Site has been classified as vegetated garden, as it forms a part of the adjacent residential properties. Dominated by perennial rye-grass, other grass species including occasional red fescue and false oat-grass, and frequent cock's-foot *Dactylis glomerata*. Herbaceous species present include occasional creeping buttercup *Ranunculus repens* and greater periwinkle *Vinca major*.

- 5.2.10 The sward length is maintained at less than 10cm.

- 5.2.11 A log pile, denoted as TN1 within Figure 1, and pile of vegetation cuttings, TN2, are located within the vegetated gardens.

Artificially unvegetated, unsealed surface

- 5.2.12 An area of gravel present in the west of the Site is currently utilised as access and parking for the off-site residential buildings.

Developed Land; Sealed Surface (Hardstanding)

- 5.2.13 Hardstanding (concrete) is present with the Site in the form of access roads and parking. There are no botanical species present within this habitat type.

Developed Land; Sealed Surface (Buildings)

5.2.14 Two buildings are present on-site (B1 and B2).

5.2.15 B1 is an open-sided brick barn with slate roof. B2, connected to B1, is a small building made of timber, with a felt roof.

5.3 Protected and Notable Species

Badger

5.3.1 The grassland and hedgerows within the Site provide suitable foraging and commuting habitat for badger. There is no sett-building habitat within or adjacent to the Site.

5.3.2 No signs of badger or their setts were observed during the survey.

*Bats**Foraging and Commuting Habitat*

5.3.3 The grassland provides sub-optimal foraging opportunities for bats. The hedgerows and trees provide suitable foraging and commuting opportunities. Furthermore, the Site is connected to areas of broadleaved woodland and grassland which provide foraging opportunities within the surrounding landscape.

Roosting Habitat – Trees

5.3.4 A detailed ground-level tree assessment was undertaken of the trees within and immediately adjacent to the Site. Table 3 below provides a description of each tree, and their locations are depicted on Figure 1.

Table 3 – GLTA results of the trees within and immediately adjacent to the Site

Tree Ref	Species	PRFs	Level of Suitability
T1	Indian cigar <i>Catalpa speciosa</i>	None	None
T2	Western Red-cedar <i>Thuja plicata</i>	None	None
T3	Western Red-cedar	None	None
T4	Western Red-cedar	None	None
T5	Field Maple <i>Acer campestre</i>	Peeling bark at 4m high	FAR
T6	<i>Cedrus</i> sp.	None	None
T7	Beech <i>Fagus sylvatica</i>	None	None
T8	Wild Cherry <i>Prunus avium</i>	None	None

Roosting Habitat – Buildings

5.3.5 Two buildings are present within the Site. Table 4 below provides a description of each building and their locations are depicted on Figure 1.

Table 4 – Building Descriptions and Suitability to Support Roosting Bats

Building Ref	Description	PRFs (and any evidence found?)	Suitable Access Points	Level of Suitability
B1	Single-storey barns (x2 connected) in the north of the Site, open-sided on the south side. Brick walls, with tight-fitting weatherboarding on the west side. Mono-pitched on the eastern half and shallow pitched on the western half, artificial slate roof.	Lifted roof slates and lifted ridge tile. Gaps in brick work. Breathable roof lining present.	Open-sided	Low
B2	Connected to B1. Tight timber walls with a flat felt roof.	None	None	Negligible

Dormouse

- 5.3.6 No evidence of dormouse was recorded during the survey. The hedgerows provide limited sub-optimal hazel dormouse habitat, limited in species diversity and connectivity to surrounding suitable habitat.

*Great Crested Newt**Terrestrial Habitat*

- 5.3.7 The habitats on Site are sub-optimal and limited for GCN in their terrestrial stages, with the hedgerows being suitable for commuting and foraging GCN (albeit limited in extent) and the grassland potentially enabling dispersal across, albeit highly sub-optimal. The grassland and vegetated garden are maintained to a sward length considered too short to be suitable for resting GCN.
- 5.3.8 One log pile (TN1) and one vegetation cutting pile (TN2) are present on site, which would provide suitable refuge habitat for the species, however, both are surrounded by unsuitable grassland for GCN to reside in.

Aquatic Habitat

- 5.3.9 A review of available online OS mapping identified two ponds within 250m of the Site, as depicted on Figure 2.
- 5.3.10 Both were subject to HSI assessment. A summary of the survey results is presented in Table 5. The full HSI calculations are presented in Appendix C.

Table 5 – Habitat Suitability Index Assessment Results

Waterbody Reference	Description	Distance from Site	HSI Score	HSI Suitability
WB1	Dew pond adjacent to orchard	110m NE	0.64	Average
WB2	Almost dry road side ditch	100m SW	0.47	Poor

Reptiles

- 5.3.11 The habitats on Site are highly sub-optimal for reptiles as the grassland and vegetated garden are maintained to a sward length considered too short to be suitable for resting or breeding reptiles. One log pile (TN1) and one vegetation cutting pile (TN2) are present on site, which would provide suitable refuge habitat for the species, however both are surrounded by sub-optimal grassland.

Nesting Birds

- 5.3.12 No nesting birds or disused nests were recorded during the survey. Suitable nesting habitat is present within the Site in the form of buildings, hedgerows and scattered trees.

Other Species

- 5.3.13 The habitats recorded within the Site provide suitable, albeit limited, foraging (grassland) and resting places (hedges) for European hedgehog, a “Notable” species and SPI listed under s41 of the NERC Act 2006.
- 5.3.14 Beyond those noted above, the survey identified negligible suitability for other species of conservation concern within the Site.

6 EVALUATION AND RECOMMENDATIONS

6.1 Designated Sites

Statutory Designated Sites

Internationally Designated Sites

- 6.1.1 The desk study returned one record of an Internationally designated site within 5km of the Site; North Downs Woodland SAC, which is located approximately 880m south east of the Site. The SAC is an area of semi-natural dry grassland, scrubland facies and woodland. The Gravesham Local Plan Core Strategy (adopted September 2014) states that the SAC is a significant biodiversity resource. Developers may need to provide or contribute to mitigation measures for recreation needs arising from their developments, which may include provision of alternative greenspace, contributions to visitor control mechanisms and/or management of the SAC, to ensure that detrimental impacts on the integrity of the SAC sites are avoided.
- 6.1.2 However, as the proposed development is an amendment to an existing pub garden and winery, it is unlikely that the proposals will increase recreation within the nearby SAC. Therefore, no further consideration to this, or any other European protected site, is required in this instance. Therefore, no further consideration is required, beyond standard general pollution prevention control measures, and species-specific protections outlined within this section of the report.

Nationally Designated Sites

- 6.1.3 The desk study returned two records of Nationally designated sites within 1km of the Site.
- 6.1.4 The closest designated site is North Kent Woods and Downs NNR which is a network of protected sites, the closest parcel being approximately 200m north of the Site. However, the limited size and scope of the proposed development means it is unlikely that the proposals will have any adverse impact on this or any other Nationally designated site.

SSSI Impact Risk Zones (IRZs)

- 6.1.5 The Site is within the IRZ of several SSSIs. However, at the locations selected, the proposed development is unlikely to have a harmful effect on terrestrial SSSIs and the SACs, SPAs or Ramsar sites that they underpin. Therefore, there is no need to consult Natural England on the likely impacts of development on these.

Non-Statutory Designated Sites

- 6.1.6 The desk study returned records of two non-statutory designated sites within 1km of the Site. The closest Local Wildlife Site is Henley Wood & Pasture LWS which is located 350m west of the Site.

- 6.1.7 However, due to the limited extent and nature of the proposals, coupled with the spatial separation and lack of ecologically valuable onsite habitats to be affected, no statutory or non-statutory designated sites are considered likely to be impacted by the proposed development.

6.2 Ancient Woodland

- 6.2.1 Guidance from Natural England and the Forestry Commission state that no development should occur within 15m of an ancient woodland. The proposed development lies beyond 15m of any ancient woodland and therefore no detrimental impacts to ancient woodland will occur.

6.3 Habitats and Botanical Species of Interest

- 6.3.1 The NERC s41 HPI, 'deciduous woodland', exists 5m west of the Site. Separated from the Site only by Luddesdown Road, measures to ensure that the proposed development does not result in any adverse impacts upon this woodland are required.

- 6.3.2 To ensure the integrity of the woodland habitat is maintained, the following measures should be implemented in full:

- The adjacent woodland should be protected by HERAS security fencing (or similar) with fine-mesh dust netting installed along the extent prior to the commencement of development works.
- Drainage channels and trenches should be designed to ensure that water and sediment from the construction site does not enter the woodland.
- Standard pollution prevention measures during construction should be implemented.
- A sensitive lighting strategy should be designed to ensure that the woodland is not subject to any illumination from external artificial lighting as a result of the proposed development (including during the construction phase).

- 6.3.3 Implementation of the above measure, as well as the separation of the woodland from the Site by Luddesdown Road, will ensure that no loss or deterioration of the woodland will result from the proposed development and the works will be conducted in accordance with the requirements of the NPPF and the guidance set out to protect broad-leaved woodland sites.

6.4 Protected and Notable Species

Badger

- 6.4.1 Although suitable foraging and commuting habitat for badger is present within the Site, no evidence of badger was recorded within or adjacent to the Site, and there is no sett-building habitat within or adjacent to the Site. Therefore, no further surveys are required at this time.

- 6.4.2 However, badgers are a highly mobile species and should a period of more than 12 months from the time of writing pass, an update badger survey should be conducted.

Bats

Commuting and Foraging Habitat

- 6.4.3 The hedgerows and trees provide suitable foraging and commuting habitat for bats. The grassland provides sub-optimal foraging habitat. Furthermore, the Site is connected to other areas of suitable habitat within the wider landscape. However, whilst the Site's habitats are therefore considered to offer 'Low' suitability for foraging and commuting bats, given the very limited extent of these habitats, further bat activity surveys are considered disproportionate, and are not recommended, in this instance.

- 6.4.4 However, since lighting can be detrimental to bats using vegetation for foraging and commuting, any external lighting proposed for the development should be sensitive to the retained trees and woodland within and around the Site, avoiding direct illumination of them. The lighting scheme should be designed using guidance provided by the Bat Conservation Trust ([BCT & ILP, 2023](#)). Potential design measures include:

- Use of LED lighting, which does not emit UV and which has a warm white light spectrum (ideally <2700Kelvin) and uses wavelengths higher than 550nm.
- Directional lighting, such as low-level downward direction lighting to minimise light spill.
- Use of motion sensor (PIR activated) lighting or timers to restrict lighting to required periods.
- Dimming or part-night lighting to reduce light levels when bats are most active.
- Use of the lowest lux possible.
- Use of back shields/louvres to limit light spill

- 6.4.5 Further lighting specifications will be provided at the detailed design stage.

Roosting Habitat

- 6.4.6 A detailed ground-level tree assessment of trees within the Site identified one tree, T5, which would require further assessment, should its removal be required by the development.

Table 6 – Trees with Bat Roost Suitability to be Affected by the Proposed Development

Tree Reference	Tree Species	Bat Roost Suitability	Number and Type of Further Survey(s) Required
T1	Indian Cigar	None	N/A
T2	Western Red-cedar	None	N/A

T3	Western Red-cedar	None	N/A
T4	Western Red-cedar	None	N/A
T5	Field Maple	FAR	Climb and Inspect, if felling required
T6	<i>Cedrus sp.</i>	None	N/A
T7	Beech	None	N/A
T8	Wild Cherry	None	N/A

6.4.7 An internal and external assessment of the buildings within the Site identified the building denoted B1 to support 'Low' suitability for roosting bats. It is understood that this building is to be demolished under a separate, granted planning application (ref 20250053), and is therefore not included within this planning application. Summary recommendations are provided within Table 7, in-line with BCT guidelines (Collins, 2023).

Table 7 – Buildings with Bat Roost Suitability

Building Reference	Bat Roost Suitability	Number and Type of Further Survey(s) Required
B1	Low	None – It is understood that surveys were undertaken by ECO assistance in 2024 as part of previous, granted planning application (ref 20250053).
B2	Negligible	None

Dormouse

6.4.8 With the native hedgerow (H2) supporting only the single native hedge species of blackthorn, in accordance with the habitat quality assessment tables within the Haxel Dormouse Mitigation Handbook (The Mammal Society, 2025), this hedgerow has 'low' species diversity for dormice, is regularly managed and at only 1m wide has 'low' structural complexity. In line with current guidance H2 offer 'poor' quality habitat for dormice.

Table 3.6 The relationship between species diversity, structural complexity and habitat quality.

		Diversity		
		High	Medium	Low
Complexity	High	Excellent	Good	Fair
	Medium	Good	Good	Poor
	Low	Fair	Poor	Poor

Image 2 – Dormouse Habitat Quality Calculator, taken from the Hazel Dormouse Mitigation Handbook (2025)

- 6.4.9 Albeit rarely occurring, the non-native hedgerow (H1) contains three native species, holly, wild cherry, and rose, which presents as ‘medium’ species diversity. However, at less than 2m wide, the hedgerow has ‘low’ structural complexity and the hedgerow H1 provides is therefore considered to provide ‘poor’ quality habitat for dormice.
- 6.4.10 Beyond the two Low quality hedgerows, no other suitable dormouse habitat is present on site. Connectivity to woodlands and hedgerows suitable to support dormice within the wider landscape does, however, exist.
- 6.4.11 From review of the current proposals, it is understood that both hedgerows are to be removed to facilitate the development. Given the limited extent and that less than one dormouse would be affected (0.055 dormice calculated using Table 3.7 on page 26 of the Hazel Dormouse Mitigation Handbook (2025)), the application of further surveys to determine the presence/likely absence of the species is considered disproportionate.

Table 3.7 Relationship between habitat quality and dormouse density in terms of numbers of breeding adults; (n km⁻¹ in hedgerow and n ha⁻¹ in woodland/scrub).

Quality	Hedgerow	Woodland/ Scrub
Excellent	8	10
Good	5	6
Fair	3	4
Poor	1	2

Image 3 – Estimating the number of dormice to be affected, taken from the Dormouse Mitigation Handbook (2025)

6.4.12 Dormice are, however, fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), and as a precautionary measure, the following sensitive clearance measures are recommended:

- To ensure all on-site staff are aware of the working sensitivities to be considered when working potentially near a European Protected Species, prior to the start of works, the contractors working on the project should be subject to a 'Toolbox Talk' given by a suitably experienced and licensed Ecological Clerk of Works (ECOW). The 'Toolbox Talk' would outline the current legislation related to dormice and the appropriate manner in which to proceed with the work.
- The clearance should be undertaken in a directional manner towards the retained offsite habitat, in order to achieve the safe displacement of any unlikely dormice present into suitable offsite habitat outside of the working area.
- Given that the suitable dormouse habitat within the Site comprises approximately 57m of hedgerow, which provides poor quality habitat and can be fully inspected, the vegetation clearance can be undertaken in a single stage process (meaning it can be taken down to ground and roots pulled out all in one go), but must be undertaken outside of hibernation season (hibernation: November to March inclusive), and ideally also be undertaken outside of the core breeding season of dormice also (however, during the active season of April-October is acceptable). Therefore, single stage clearance ideally to be undertaken in May or in mid-September-October of any given year. Note: clearance in September/October would avoid potential conflict with nesting birds.

- Hedgerow clearance should be undertaken using hand tools only (e.g. strimmers, brush cutters and/or chainsaw), under the supervision of a suitably licensed ECoW who will undertake a fingertip search of the clearance area prior to (and, where required, during) removal.
- If, at any point, a dormouse or dormouse nest is found, works must **stop** immediately and advice sought from a suitably experienced ecologist and/or a Natural England EPS mitigation licence obtained, prior to re-commencing.

6.4.13 Provided the above sensitive working methodology is followed, the proposed development can be conducted in accordance with all relevant planning policies and legislation that protect dormice.

Great Crested Newt

6.4.14 The Site is located within the green impact risk zone for GCN (Natural England). However, the habitats within the Site are considered suboptimal to support GCN during its terrestrial phase and are unlikely to provide suitable habitat for the species.

6.4.15 While the log pile (TN1) and a vegetation cutting pile (TN2) may provide refuge for the species, both are situated within the sub-optimal grassland and are therefore isolated in nature. As such these are not considered to offer significant terrestrial habitat for GCN.

6.4.16 The HSI assessment of the two waterbodies within 250m of the Site, identified the pond located c. 110m to the north-east of the Site (WB1), as providing 'Average' suitability, and a second pond (WB2) that is located c.100m to the south-west as providing 'Poor' suitability.

6.4.17 As the habitats to be affected are suboptimal, extend to <0.5ha, and beyond 100m from any suitable breeding habitat, it is considered disproportionate to undertake further surveys or licensing for GCN.

6.4.18 This matter is further corroborated through use of the Natural England 'Rapid Risk Assessment' calculator tool, which confirms a result of 'Green: Offence highly unlikely' (see Image 4 below).

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	0.1 - 0.5 ha lost or damaged	0.1
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
	Maximum:	0.1
Rapid risk assessment result:		GREEN: OFFENCE HIGHLY UNLIKELY

Image 4 – Rapid Risk Assessment GCN Calculator Results for the Proposed Development

6.4.19 However, the grassland should be maintained at its current sward height, to prevent the habitat from becoming more suitable for the species prior to and during construction. In addition, should either TN1 or TN2 require removal, this should be undertaken under the supervision of a suitably experienced Ecological Clerk of Works (ECoW).

6.4.20 The above sensitive hedgerow clearance methodology for dormice will also ensure the welfare of any unlikely GCN present is safeguarded throughout construction.

6.4.21 In the unlikely event that a GCN is found onsite, all works must **stop** until the appointed ecologist has been contacted and, if required, an appropriate licence has been applied for and obtained from Natural England.

Reptiles

6.4.22 The habitats on Site are considered sub-optimal for reptiles as the grassland and vegetated garden are maintained to a sward length considered insufficient to provide suitable resting or breeding habitat for reptiles. The log pile (TN1) and vegetation cutting pile (TN2) provide suitable refuge habitat, however, both are surrounded by sub-optimal grassland and isolated in nature. Further surveys to determine the presence/likely absence of reptiles are considered disproportionate.

6.4.23 As stated above, the grassland should be maintained at its current sward height to prevent it from becoming more suitable for reptiles, and the above mitigation measures will also ensure that the welfare of reptiles (should they be present) will be safeguarded throughout the development. In addition, should any reptiles be found, all works must **stop** and the ecologist consulted on the correct method to proceed.

Nesting Birds

6.4.24 Suitable breeding, nesting and foraging habitat for birds is present within the Site, however, further surveys in relation to breeding birds is considered disproportionate.

6.4.25 As all nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended), it is recommended that works to these areas (such as trees, hedgerows, buildings), where necessary, are conducted outside the core breeding period for birds of late February – August inclusive.

6.4.26 Should this timeframe be unobtainable, a survey for the presence of nesting birds should be conducted by a suitably experienced ecologist immediately prior to the start of works. Should evidence of nesting birds be recorded, works within 5m of the nest, or works that have the potential to destroy the nest(s), should stop until the eggs have hatched, and the chicks fledged, or the nest is deemed by a suitably experienced ecologist to no longer be active.

Other Species

6.4.27 Habitats within the Site have the suitability to support hedgehogs and there are suitable habitats within the wider landscape. Therefore, the proposed development should incorporate new hedgerow/scrub planting, log/brash piles in appropriate locations on the peripheries of the development, particularly if the existing piles need to be removed, and dark corridors. Ensuring that any lighting does not spill onto vegetation such as hedgerows will also benefit hedgehogs. The above mitigation measures in relation to dormice, GCN and reptiles, will also ensure no hedgehogs are harmed during the course of the development.

6.4.28 There are no obvious and immediate issues regarding other protected or notable species on the Site and no further surveys to determine the presence of other protected species or notable species is required in this instance.

6.4.29 Should at any point during the development a protected or notable species be identified within the Site, then all works should **stop** and the appointed ecologist consulted on the appropriate manner in which to proceed.

7 ECOLOGICAL ENHANCEMENTS

7.1 Opportunities to include biodiversity enhancements within the Site exist and, in accordance with the requirements of the NPPF 2024, the following recommendations are considered appropriate for the Site:

- The installation of a bird box in a suitable location, such as a tree within the Client's ownership, would increase the Site's suitability for nesting birds. The box should be selected from open fronted or hole fronted nesting boxes. To maximise suitability, the box should be installed on sheltered aspects close to vegetation at a height of 2-3m, preferably on north, northeast or northwest facing elevations.
- The installation of a bat box installed on a tree in a suitable location within the Client's ownership would increase the Site's suitability for roosting bats. The box should be installed at a height of 3m or more on sunny, sheltered aspects, away from direct illumination by artificial lighting and in a location, which ensures connectivity to foraging habitats within the wider landscape. In this instance, a box such as the Kent Bat box or Schwegler 2FN (or similar) is recommended for any suitable retained trees.
- The incorporation of a wildlife-friendly planting scheme within the grounds post-development, including native plant species, would be of benefit to invertebrates, and subsequently birds and bats. Species such as honeysuckle *Lonicera periclymenum* and traveller's-joy *Clematis vitalba* would be of benefit to dormice, as they provide nesting material.
- The incorporation of a log and brash pile at a suitable location within the Site would provide an enhancement for hedgehog, GCN, reptiles and other species, particularly if existing piles are to be removed.
- The installation of an insect house within a suitable location within the Site would provide an enhancement for invertebrates, and subsequently birds and bats.
- Any tree planting should be undertaken using native species such as pedunculate oak, small leaved lime *Tilia cordata*, wild service tree *Sorbus torminalis* or similar.

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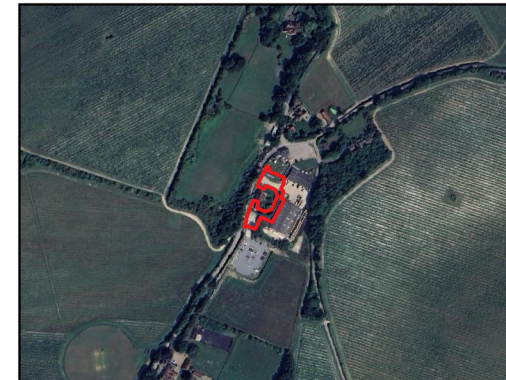
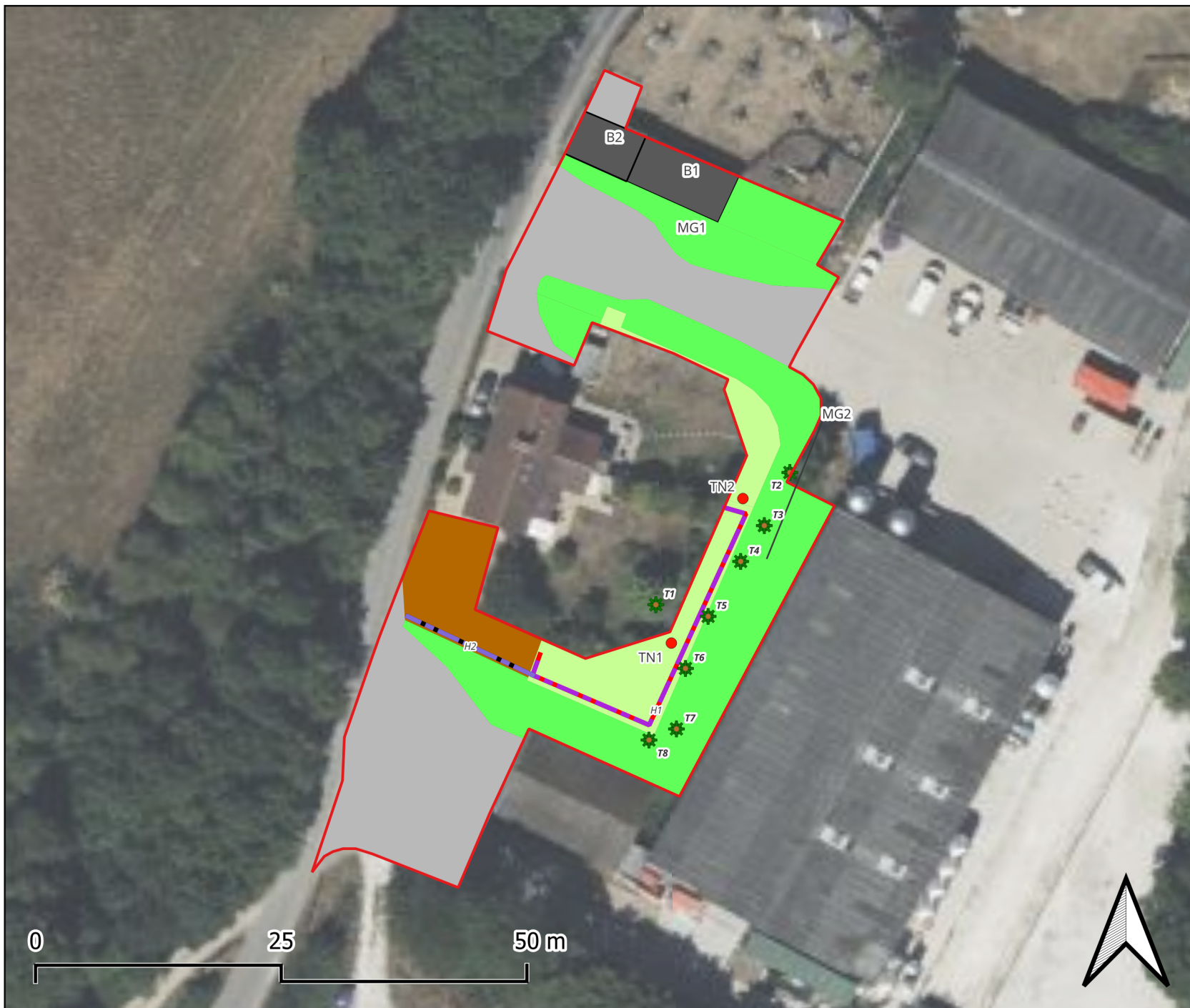
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Figures

Figure 1: UK Habs Habitat Plan (J26-000014 - Golden Lion Garden Extension)



Key

Red Line Boundary

BNG

● Target Notes

✱ Existing trees

— Native Hedgerow

— Non-native and Ornamental Hedgerow

Modified Grassland

Developed Land; Sealed Surface (Buildings)

Developed Land; Sealed Surface (Hardstanding)

Artificial Unvegetated, Unsealed Surface

Vegetated Garden

Surveyor: Ashley Walker & Ryan Richardson

Survey Date: 26.01.2026

Drawn by: Ryan Richardson

Drawn Date: 20.03.2026

Ref: J26-000014

Scale: 1:550 @ A4

Contains Google Imagery ©2024 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, Map data ©2024

Figure 2: Waterbodies within 250m (J26-000014 - Golden Lion Garden Extension)

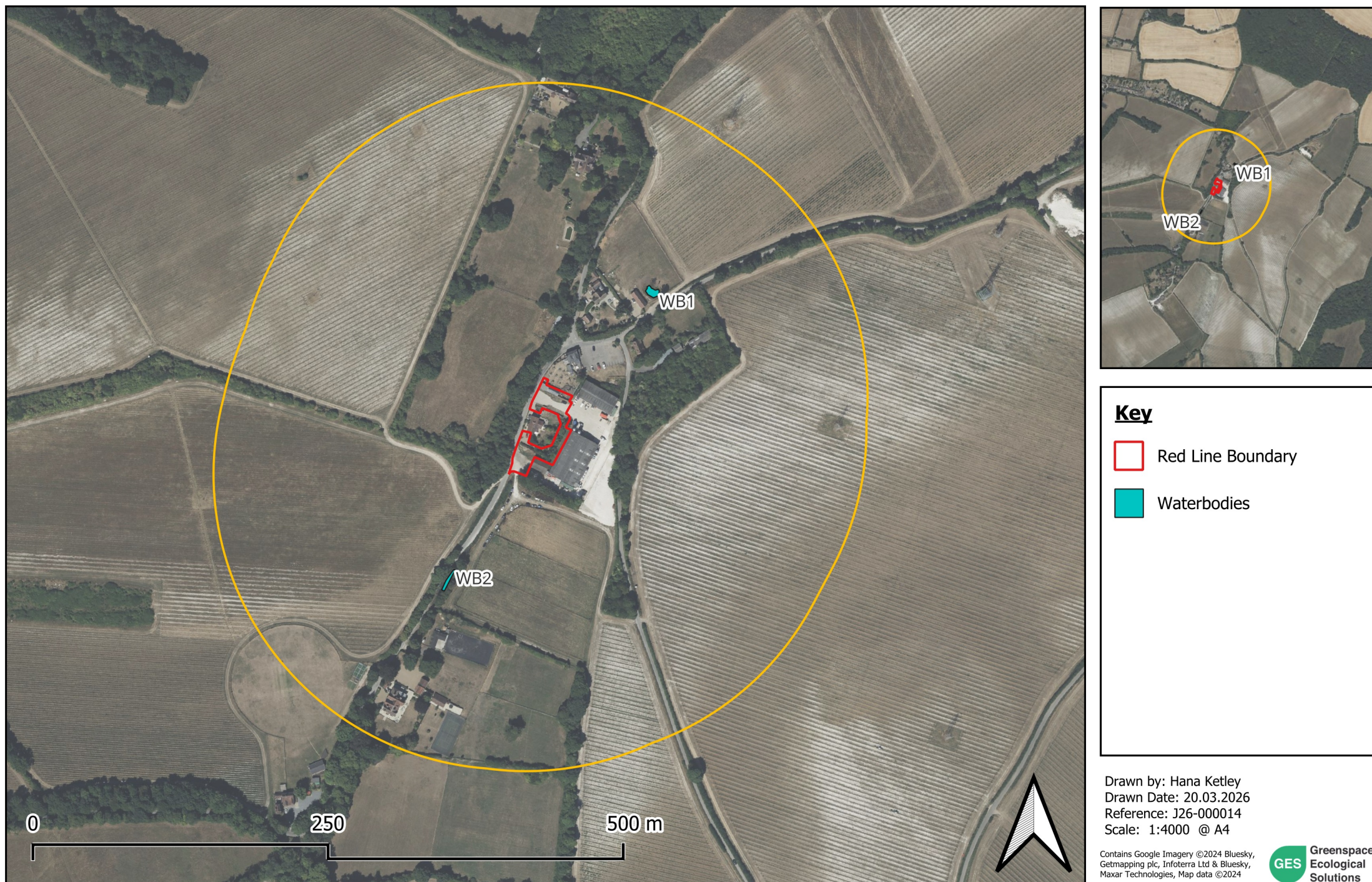
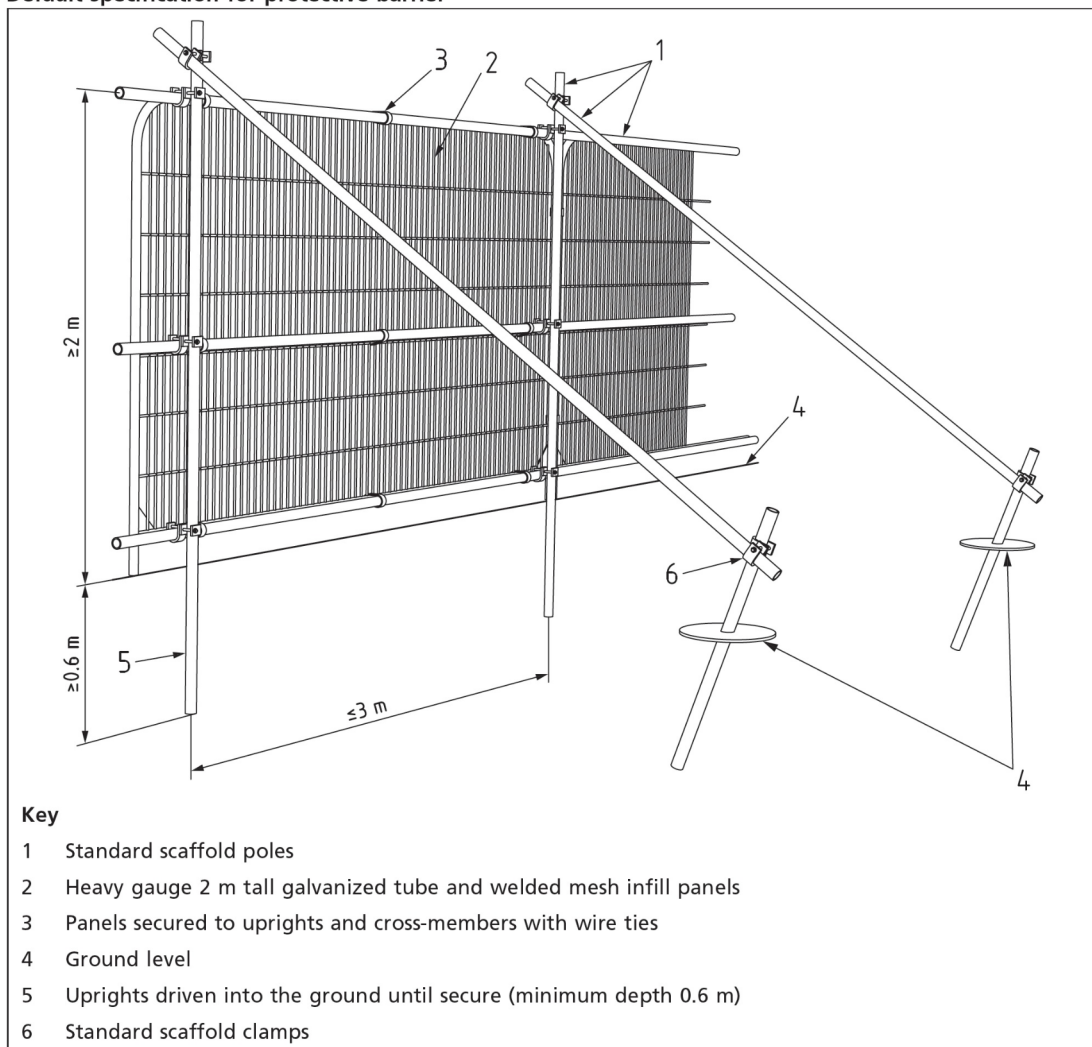
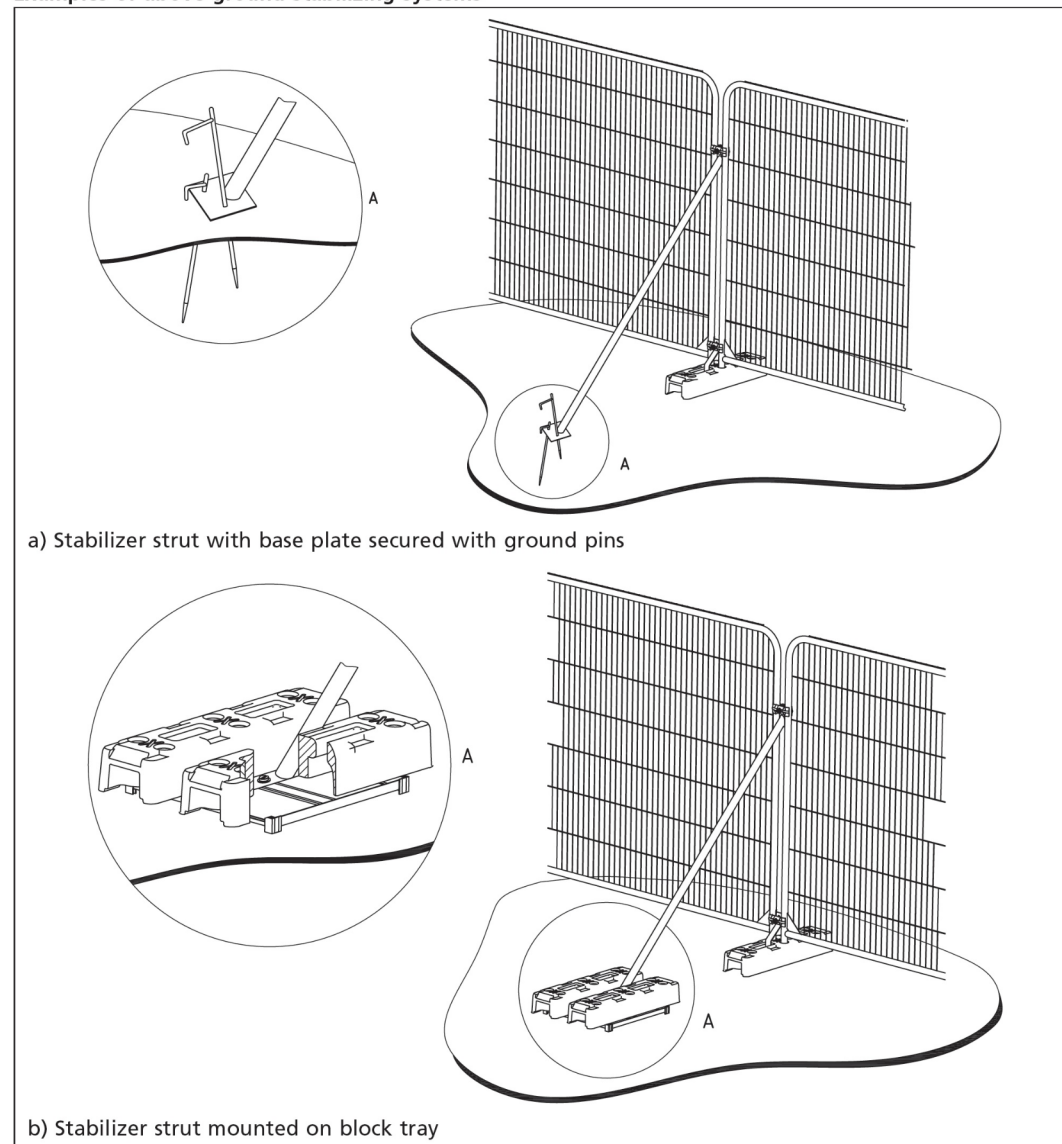


Figure 3 - Tree Protection Measures (J26-000014 - Golden Lion Garden Extension)

Default specification for protective barrier



Examples of above-ground stabilizing systems



Appendices

APPENDIX A – Site Photographs

Photo 1: Modified grassland (MG1)



Photo 2: Modified grassland (MG2) and hardstanding



Photo 3: Vegetated garden



Photo 4: Vegetated garden



Photo 5: Developed land; sealed surface



Photo 6: Building B1, open sided barns.



Photo 7: Building B1, lifted/slipped roof tiles



Photo 8: Internal aspect of B1



Photo 9: Building B2, timber building



Photo 10: Artificially unvegetated; unsealed land



Photo 11: Waterbody WB1



Photo 12: Waterbody WB2

APPENDIX B – Legislation and Planning Policies

Legislation

- The Conservation of Habitats and Species Regulations 2017 (as amended) transposes European Union Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive) into National law. These regulations provide for the designation and protection of 'European Sites', the protection of 'European Protected Species' and the adaptation of planning controls for the protection of such sites and species. Under the regulations, public bodies have a duty in exercising their functions to have regard to the EC Habitats Directive.
- The Environment Act 2021 operates as the new framework of environmental protection following the United Kingdom's departure from the EU. The Environment Act allows the UK to enshrine some environmental protection into law, and offers new powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction. The Act mandates the creation of Local Nature Recovery Strategies, Protected Site Strategies, Species Conservation Strategies, and the use of conservation covenants to support the design and delivery of strategic approaches to deliver better outcomes for nature. Additional mandates covered by The Act (Part 7) include:
 - A requirement for Biodiversity Net Gain for developments, to ensure all development deliver a minimum of 10% net gains in biodiversity (Section 98).
 - Strengthening of the duty placed on all public bodies to “conserve” and “enhance” biodiversity (Section 102).
 - Duty placed upon Local Authorities to consult prior to felling street trees (Section 115).
- The Wildlife and Countryside Act 1981 (as amended) provides detail on a range of protection and offences relating to wild birds, other animals, and plants. The level of protection depends on which Schedule of the Act the species is listed on. Licences are available for specific purposes to permit actions that would otherwise constitute an offence in relation to species.
- The Countryside Rights of Way Act 2000 provides additional support to the Wildlife and Countryside Act 1981; for example, increasing the level of protection for certain species of reptiles.
- The Natural Environment and Rural Communities (NERC) Act 2006 imposes an obligation on all public bodies, including local authorities, to consider whether their activities can contribute to the protection of wildlife. The duty is created by section 40(1) of the Act, which states that:

“Every 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.”

- The Hedgerows Regulations 1997 are enforced under the Environment Act 1995, and serves to: restrict the removal of hedgerows, or parts of hedgerows which are over 20m in length. In this case, removal includes digging up and replanting elsewhere, as well as removing from the land completely or destroying in the course of other actions. This includes developments or activities which destroy the roots, causing the vegetation to die.
- The Protection of Badgers Act 1992 exists to protect badgers *Meles meles* from cruelty. Under the act it is a criminal offense to wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so, or to intentionally or recklessly interfere with a sett.
- The Wild Mammal (Protection) Act 1996 protects wild mammal species from certain cruel acts, including kicking, beating, nailing, or otherwise impaling, stabbing, burning, stoning, crushing, drowning, dragging or asphyxiation of any wild mammal with intent to inflict unnecessary suffering. Crushing and asphyxiation are most likely to occur as a result of development proposals, should these works collapse any mammal burrows, or encounter wild mammals on site.

National Planning Policy

- The National Planning Policy Framework (December 2024) states (Section 15) that the planning system should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks; promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. It also states that local planning authorities should refuse planning on the following principles:
 - If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for.
 - If development is on land within or outside a Site of Special Scientific Interest (SSSI), and is likely to have an adverse effect on it (the exception being where the benefits of the development in the location proposed clearly outweigh its likely impact);
 - If development results in the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient or veteran trees (unless there are wholly exceptional reasons, and a suitable compensation strategy exists).

Additionally, the NPPF states that development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity

improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

- Species and Habitats of Principal Importance for Conservation in England and Wales and priority habitats and species listed in the Gravesham Borough Council local plan are species which are targeted for conservation. The government has a duty to ensure that involved parties take reasonable practice steps to further the conservation of such species under Section 41 of the Natural Environment and Rural Communities Act 2006. In addition, the Act places a biodiversity duty on public authorities who 'must, in exercising their functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity' (Section 40 [1]). Criteria for selection of national priority habitats and species in the UK include international threat and marked national decline.

Local Planning Policy

- The Gravesham Local Plan Core Strategy (adopted September 2014) Policy CS12: Green Infrastructure states:
 - Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.
- Policy Cs19: Development and Design Principles states:
 - New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise.

APPENDIX C - HSI SCORES

Full HSI Scores for accessible waterbodies within 250m

Pond Reference	Pond Location	SI ₁	Pond Area	SI ₂	Pond Drying	SI ₃	Water Quality	SI ₄	Shade	SI ₅	Fowl	SI ₆	Fish	SI ₇	Pond Count	SI ₈	Terrestrial Habitat	SI ₉	Macrophytes	SI ₁₀	HSI Score	Pond Suitability
WB1	Zone A	1.00	100m2	0.20	Sometimes Dries	0.50	Moderate	0.67	0-60%	1.00	Minor	0.67	Absent	1.00	2	0.60	Moderate	0.67	26-30%	0.60	0.64	Average
WB2	Zone A	1.00	50m2	0.10	Dries Annually	0.10	Poor	0.33	66-70%	0.80	Minor	0.67	Absent	1.00	2	0.60	Moderate	0.67	41-45%	0.75	0.47	Poor

Pond Reference	Pond Description																				
WB1	Dew pond adjacent to orchard																				
WB2	Almost dry roadside ditch																				

Index Definitions	
Index Number	Index Definition
SI ₁	Location within Britain
SI ₂	Pond area (rounded to nearest 25m ²)
SI ₃	Desiccation rate (years out of ten that pond dries)
SI ₄	Water quality (subjective assessment, using indicators such as invertebrate and plant diversity)
SI ₅	Percentage of perimeter of pond shaded to at least 1m from edge
SI ₆	Level of waterfowl disturbance
SI ₇	Fish populations
SI ₈	Number of ponds within 1km not separated by major barriers
SI ₉	Terrestrial habitat quality (based on percentage of available area)
SI ₁₀	Percentage macrophyte cover

Great Crested Newt HSI Scoring Criteria

HSI Score	Pond Suitability for GCN
< 0.5	Poor
0.5 – 0.59	Below Average
0.6 – 0.69	Average
0.7 – 0.79	Good
> 0.8	Excellent