



Land at Brimsole Farm, Brimstone Hill

Preliminary Ecological Appraisal

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1 Introduction

1.1 Site Description

The site comprises land at Brimsole Farm, which is a property located off Brimstone Hill, to the east of Meopham, in the County of Kent, at approximate postcode DA13 0BN.

The site, which is estimated to be around 0.12 hectares in size, is centred on Ordnance Survey grid reference TQ 6553 6583 and contains hard standing, a dry pond, bare ground/ruderal vegetation, amenity grassland, boundary hedgerows, an immature tree and various buildings.

The land surrounding the site is rural in character, containing a low density of residential properties, along with agricultural fields, hedgerows, scattered trees and woodland.

The site and surrounding area are illustrated in an aerial image provided in Appendix 1 and photographs of the site are provided in Appendix 2.

1.2 Proposed Works

It is understood that the proposed works are the subject of a planning application to Gravesham Borough Council, the Local Planning Authority (LPA), for the construction of 2 no. three-bed detached new dwellings within the site, which will require the demolition/clearance of the existing buildings/habitats.

1.3 Aims of Study

To inform the planning application, GreenLink Ecology Ltd. has been commissioned to conduct a Preliminary Ecological Appraisal (PEA) for the site, to include a basic desk study and a survey to identify what habitats are present and look for any evidence of, or potential for, protected/notable species. The key objectives of this PEA are to:

- Identify likely ecological constraints associated with the proposals;
- Identify mitigation measures likely to be required;
- Identify additional surveys that may be required to inform an Ecological Impact Assessment¹ (EclA); and
- Identify potential opportunities offered by the proposals to deliver ecological enhancement, to ensure a net gain for biodiversity.

¹ CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.

2 Methodology

A survey was undertaken on 12th October 2023 by experienced consultant ecologist Marcus Fry MCIEEM², in accordance with the published guidelines³. The native plant species and habitat types present were identified and any evidence of, or potential for, protected/notable species and their habitats was recorded. On the day of the survey, the weather conditions were sunshine with scattered cloud and the temperature at midday was around 18°C.

A walkover of the site was also conducted on 24th February 2025, to re-establish baseline information about the site's ecological characteristics.

In addition, the Geographic Information System (GIS) databases (Multi Agency Geographic Information for the Countryside (<http://magic.defra.gov.uk>) and Kent Landscape Information System (<https://webapps.kent.gov.uk/KCC.KLIS.Web.Sites.Public/ViewMap.aspx>)) were accessed for information relating to statutory and non-statutory designated sites for nature conservation from within the surrounding area, along with notable habitat types.

² Member of the Chartered Institute of Ecology and Environmental Management (Full)

³ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal*, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

3 Results

3.1 Habitat Description

In addition to the buildings, which are considered in a subsequent section, the site contains hard standing, bare ground/gravel, a dry pond, amenity grassland, ruderal vegetation, boundary hedgerows and an immature tree.

Hard standing is present throughout the site, where there is the access off Brimstone Hill and car parking. This represents an artificial habitat type of inherently low ecological value, with no potential for protected/notable species.

Bare-ground/gravel is present where there is an access driveway between the southern agricultural building and carport. This represents an artificial habitat type of inherently low ecological value, with no potential for protected/notable species.

There is a dry pond location adjacent to the Brimstone Hill to the west, which at the time of survey contained no standing water or aquatic/marginal vegetation and consisted completely of bare ground with sparse ruderal vegetation. The location appears to periodically receive rainwater run-off from the road and adjacent residential properties, as evidenced by 4 no. inlet pipes leading into it from these directions. This represents a habitat type of low ecological value, with no significant potential for protected/notable species.

There is a small area of amenity grassland to the west of the site, adjacent to a hedgerow, in the rear garden of the adjacent farmhouse. This is a species-poor habitat type dominated by perennial rye-grass (*Lolium perenne*), along with moss (*Brachythecium rutabulum*). This represents a habitat type of low ecological value, with no potential for protected/notable species.

Sparse ruderal vegetation is present throughout the bare ground/gravel area and also around the dry pond location, with species recorded during the survey including creeping cinquefoil (*Potentilla reptans*), annual meadow-grass (*Poa annua*), chickweed (*Stellaria media*), dandelion (*Taraxacum officinale*), common nettle (*Urtica dioica*) dock (*Rumex obtusifolius*), herb Robert (*Geranium robertianum*) and sow thistle (*Sonchus oleraceus*). This represents a habitat type of low ecological value, with no significant potential for protected/notable species.

There are short section of species-poor, non-native predominantly evergreen hedgerows located on parts of the site's boundaries. There is also an immature, self-sown ash (*Fraxinus excelsior*) tree located to the east of the agricultural buildings. These represent habitat types that are of low ecological value, which has limited potential for seasonal use by breeding birds.

In summary, none of the plants within the site are protected/notable species and they do not constitute habitats that are of conservation concern.

3.2 Protected/Notable Species

3.2.1 Bats

Since the proposals include works to the agricultural buildings, stables and carport, which could directly impact upon bats (if present), these were assessed internally and externally by experienced Natural England licence holder Marcus Fry MCIEEM (no. 2015-10955-CLS), for any evidence of, or potential for bats, in accordance with the 2016 Bat Conservation Trust's (BCT) published guidance⁴. Features and evidence considered during the survey included:

⁴ Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines*, Bat Conservation Trust (3rd Edition)

- Roof and wall construction;
- Features that have the potential to be actual bat roosts or provide access to roosting opportunities within the buildings;
- Scattered or accumulated bat droppings (identified by their dry, powdery texture when compressed) within the buildings or around entrances to potential roosts;
- Oily staining, scratch marks and/or urine staining around access points to potential roosting locations;
- Places where cobwebs have been swept away; and
- The actual presence of live or dead bats.

The agricultural building to the north is single-storey, with a corrugated metal/asbestos panel walls, a softwood timber frame and a pitched roof clad in corrugated asbestos panels.

The agricultural building to the south is single-storey, with a corrugated asbestos/metal panel walls, a metal frame and a curved roof clad in corrugated asbestos panels.

The stables are single-storey with blockwork/render walls, a corrugated metal panel roof and a softwood timber frame.

The carport is single-storey, with timber weatherboard walls on three sides, a softwood frame and a roof that is partially tiled to the front and clad in corrugated metal panels to the rear.

There was no evidence of bats recorded during the internal and external inspection of the agricultural buildings and stables, which are considered to have negligible potential for use by roosting bats, due to an absence of potentially suitable roost features.

Whilst potential for bats was identified in relation to the small, front tiled roof area of the carport, this is considered to be low due to most of the tiles being machine made with limited gaps between them and there being no underlying membrane.

Since the proposed works will require the removal of the immature, self-sown ash tree, this was also assessed by experienced Natural England licence holder Marcus Fry MCIEEM (no. 2015-10955-CLS), and categorised (to align with BS 8596:2015 'Surveying for Bats in Trees and Woodland') in accordance with the 2016 BCT published guidance:

- Negligible potential – Unlikely to be used by roosting bats.
- Low potential – A tree of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with only limited roosting potential
- Moderate potential – A tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation significance.
- High potential – A 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, protection, conditions and surrounding habitat.

In summary, there was no evidence of bats recorded in association with the tree, which has no significant potential for use by roosting bats, on the basis of its immaturity and absence of potentially suitable roost features.

3.2.2 Breeding Birds

No evidence for breeding birds was recorded during the survey, which was undertaken outside the breeding season (March-July/August), although the buildings, along with the sections of hedgerow and tree represent potentially suitable habitat for use by birds during the breeding season.

3.2.3 Great Crested Newt

Ordinarily, the presence of a pond would require a Habitat Suitability Index (HSI) assessment, to determine the probability of great crested newt (*Triturus cristatus*) presence.

However, since the pond does not hold standing water for any significant duration of time, it would be unable to support a population of amphibians, including great crested newt, which require standing water of reasonable quality, along with aquatic/marginal flora, all of which are absent.

3.3 Designated Sites/Notable Habitats

According to the Multi Agency Geographic Information for the Countryside database, the site is situated within the Kent Downs Area of Outstanding Natural Beauty (AONB) and the closest statutory designated site for nature conservation is located circa two kilometres to the east, which is Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI) and North Downs Woodland Special Area of Conservation (SAC).

According to the Kent Landscape Information System database, the closest non-statutory designated site for nature conservation is located circa 100 metres to the south-east, which is Strawberry Hill, Pasture & Woodland, Meopham Local Wildlife Site (LWS).

There are also areas of Ancient Semi-Natural Woodland (ASNW) and Priority Habitat Inventory (PHI) deciduous woodland present in the local area, with the closest areas being circa 25 metres and 15 metres to the south, respectively.

4 Assessment

4.1 Constraints

It was possible to directly access the entire site and the survey was undertaken by an experienced consultant ecologist using standard survey techniques and in accordance with the published guidelines. It is therefore considered that there were no significant constraints to the PEA.

4.2 Potential Impacts

4.2.1 Habitats

The site contains common/widespread habitat types that are of low ecological value and impacts to these habitats are therefore considered insignificant.

4.2.2 Protected/Notable Species

4.2.2.1 Bats

Since there was no evidence of roosting bats recorded in association with the agricultural buildings and stables, and there was no significant potential for roosting bats identified in relation to these buildings, it is considered that there is no perceived risk of impacts to bats in relation the demolition of the buildings.

There was also no evidence of bats recorded in association with the carport and only low potential was identified in relation to the small, front tiled roof area, due the most of the tiles being machine made with limited gaps between them and there being no underlying membrane. It is therefore considered that there is a correspondingly low risk of potential impacts, which can be mitigated for on a precautionary basis, as detailed in a subsequent section.

The proposed works could actually have a positive impact for bats through the provision of wall-integrated/mounted roosting features on the new dwellings.

4.2.2.2 Breeding Birds

Although no evidence for actively breeding birds was recorded during the survey, the buildings and habitats (i.e. sections of hedgerow and immature tree) have the potential for seasonal use by breeding birds, which will be removed/disturbed to facilitate the proposed works.

Therefore, breeding birds could be impacted on by the proposed works, if undertaken during the breeding season (March-July/August, as a guide). To avoid the seasonal risk of impacts to breeding birds, precautionary mitigation measures are recommended in a subsequent section.

The proposed works could actually have a positive impact for birds through the provision of wall-integrated nesting features on the new dwellings.

4.2.2.3 Great Crested Newt

Since the pond location is unsuitable for use by great crested newt due to its inability to hold standing water and absence of aquatic/marginal flora, along with the surrounding terrestrial habitats being sub-optimal for use by the species, it is considered that there is no significant potential for great crested newt to be present and at risk of impacts as a result of the proposals.

4.2.3 Designated Sites/Notable Habitats

Although the site is within an AONB and there is a SSSI, a SAC and a LWS present in the local area, these are buffered from the proposed development site by substantial areas of land. Whilst there are areas of ANSW and PHI deciduous woodland present in relatively close proximity to the south, the proposals are limited in scope and restricted to the existing site footprint. Therefore, the proposals should not have any direct or indirect impact on designated sites/notable habitats.

4.3 Legislation and Policy

4.3.1 Bats and Great Crested Newt

All species of bat, great crested newt and the habitats of these species are fully protected under the Wildlife and Countryside Act 1981 (as amended by the CROW Act 2000) and by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The legislation makes it illegal under the Wildlife and Countryside Act 1981 (as amended) to:

- Intentionally or recklessly kill, injure or take a wild bat or great crested newt;
- Be in possession or control of any live or dead wild bat or great crested newt, or any part of, or anything derived from a wild bat or great crested newt;
- Intentionally or recklessly damage, destroy or obstruct access to any place that a wild bat or great crested newt uses for shelter or protection; and
- Intentionally or recklessly disturb any wild bat or great crested newt while it is occupying a structure or place that it uses for shelter or protection.

The legislation makes it illegal under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 to:

- Deliberately capture, injure or kill any wild animal of a European Protected Species;
- Deliberately disturb wild animals of any such species. Disturbance of animals includes in particular any disturbance which is likely to:
 - impair their ability -
 - to survive, to breed or reproduce, or to rear or nurture their young; or
 - in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - to affect significantly the local distribution or abundance of the species to which they belong;
- Deliberately take or destroy the eggs of such an animal; or
- Deliberately damage or destroy a breeding site or resting place of such an animal.

4.3.2 Breeding Birds

Breeding birds are protected under the Wildlife and Countryside Act 1981 (as amended) which makes it an offence to intentionally or recklessly kill, injure or take any wild bird or take, damage or destroy its nest whilst it is in use or being built, or to take or destroy its eggs.

4.3.3 National Planning Policy Framework

The Government revised the National Planning Policy Framework (NPPF) in December 2024. The NPPF states that when determining planning applications, LPAs should aim to conserve and enhance biodiversity by encouraging opportunities to be taken for the incorporation of biodiversity in and around developments.

5 Recommendations

5.1 Mitigation Measures

5.1.1 Habitats

Mitigation measures are not considered necessary for the habitats within the site, since these represent common/widespread habitat types that are of low ecological value and impacts to these habitats are therefore considered insignificant.

5.1.2 Protected/Notable Species

5.1.2.1 Bats

Since it is considered that there is no significant risk of potential impacts to bats in relation to the demolition of the agricultural buildings and stables, mitigation measures are only recommended on a precautionary basis for the small, front tiled area on the carport. This should be carefully dismantled outside of winter, under the supervision of an experienced Natural England licence holder.

If at any time during these works, it becomes apparent that bats are present and at risk of impacts, works will temporarily cease whilst Natural England is consulted about how to proceed further, without the risk of an offence being committed.

5.1.2.2 Breeding Birds

Works to the buildings and removal/disturbance of the sections of hedgerow/tree should ideally be undertaken outside of the breeding bird season (avoiding March-July/August).

If it is necessary to conduct this work during the breeding season, it should be carried out under the supervision of an experienced ecologist, who will check for the presence/absence of any active birds' nests.

If any active nests are found then works with the potential to impact on the nest must cease and an appropriate buffer zone should be established until the young have fledged and the nest is no longer in use.

5.1.2.3 Great Crested Newt

Since it is considered that there is no significant risk of potential impacts to great crested newt, mitigation measures are not recommended.

However, if at any time during the proposed works, it becomes apparent that great crested newt is present and at risk of impacts, works will need to temporarily cease whilst a Natural England licence holder is consulted about how to proceed further, without the risk of an offence being committed.

5.1.3 Designated Sites/Notable Habitats

Since it is considered that there is no significant risk of impacts to designated sites/notable habitats as a result of the proposed works, mitigation measures are not required.

5.2 Enhancement Measures

It is understood that the proposals include the decommissioning of the pond and replacement with an attenuation/soakaway system and therefore, it will not be possible to enhance the pond habitat.

To ecologically enhance the site in accordance with the principles of the NPPF, the following measures are recommended, which are considered to be appropriate for the site and proportionate to the scale of the proposals:

- The re-landscaped site will include a high proportion (>70%) of native species planting, to include small trees, hedging, large shrubs, climbers and bulbs, to ensure that there is good habitat structure and diversity, to benefit local wildlife. Non-native hedging such as cherry laurel and conifers will not be used;
- The new dwellings will each incorporate 2 no. small and discrete wall-integrated/mounted bat boxes, to be installed on different aspects and not illuminated by any existing or proposed artificial lighting; and
- The new dwellings will each incorporate 3 no. small and discrete wall-integrated/mounted bird boxes, to be installed on aspects other than the south (to avoid the risk of over-heating during the summer months).

6 Conclusions

To inform the planning application, GreenLink Ecology Ltd. was commissioned to undertake a PEA of the site, which has been completed without significant constraint.

The survey that was undertaken by an experienced consultant ecologist, determined that the site contains common/widespread habitat types that are not of conservation concern. Since impacts to these habitats are considered insignificant, mitigation measures are not required for habitats.

During the survey, the potential presence of legally protected/notable species was considered, including bats, breeding birds and great crested newt.

Since it is considered that there is no significant risk of potential impacts to bats in relation to the demolition of the agricultural buildings and stables, mitigation measures are only recommended for bats in relation to the carport, on a precautionary basis.

To avoid the seasonal risk of impacts to breeding birds, in relation to the buildings and potentially suitable habitats (i.e. sections of hedgerow and tree), mitigation measures are recommended in this report.

Since it is considered that there is no significant risk of potential impacts to great crested newt, mitigation measures are not required for this species.

Although there are designated site for nature conservation in the local area, along with notable woodland habitats, there is no perceived risk of impacts as a result of the proposed works and therefore, no need for mitigation measures.

In accordance with the NPPF, recommendations have been made for ecological enhancement measures to benefit local biodiversity, in particular habitats, bats and breeding birds.

Overall, there are no known overriding ecological constraints that would prevent the proposed works going ahead, subject to the recommendations made in this report being correctly implemented.

7 Disclaimer

This report is issued to the client for their sole use and for the intended purpose as stated in the agreement between the client and GreenLink Ecology Ltd. under which this work was completed, or else as set out within this report.

This report may not be relied upon by any other party without express written agreement. The use of this report by unauthorised third parties is at their own risk and GreenLink Ecology Ltd. accepts no duty of care to any such third party.

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Nothing in this report constitutes legal opinion. If legal opinion is required the advice of a qualified legal professional should be secured. Observations relating to the state of built structures or trees have been made from an ecological point of view and, unless stated otherwise, do not constitute structural or arboricultural advice.

8 Appendices

Appendix 1: Aerial image illustrating the site location and surrounding area

Photograph 1: The approx. site boundaries and immediate surrounding area



Photograph 2: The site location and wider surrounding area



Appendix 2: Photographs of the site

Photograph 1: View of the site from the entrance off Brimstone Hill, looking south-east



Photograph 2: View of the site from the stable, looking west



Photograph 3: View of the stables, looking north-west



Photograph 4: Interior of the stable



Photograph 5: Southern aspect - stables and western aspect - northern agricultural building



Photograph 6: Eastern aspect of the northern agricultural building, looking north



Photograph 7: Eastern aspect of the northern agricultural building, looking south



Photograph 8: Interior of the northern agricultural building



Photograph 9: View of the pond after rainfall on 16th January 2023, with shallow standing water



Photograph 10: View of the pond after circa two weeks, with no standing water



Photograph 11: Front of the car port, looking north-west



Photograph 12: Interior of the carport, illustrating small, front tiled roof area with no membrane



Photograph 13: View of the southern agricultural building, looking north-west



Photograph 14: View of the southern agricultural building, looking south-west



Photograph 15: Southern agricultural building interior - no evidence of/potential for bats/birds



Photograph 16: View of the dry pond location, looking west

