

JAMES BLAKE

A S S O C I A T E S

Ecological Impact Assessment

of

Milton Place, Gravesham,

Kent

on behalf of

Gravesham Community Investment Partnerships LLP

July 2024

Revision B – February 2025

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Revision	Purpose	Originated	Checked	Authorised	Date
		SE	SW	JBA	July 2024
A	Client comments	SW		JBA	November 2024
B	Client comments	SE	PS	JBA	February 2025
Job Number: JBA 24/183		 JAMES BLAKE ASSOCIATES Title: Ecological Impact Assessment of Milton Place, Gravesham, Kent			

Disclaimer

James Blake Associates Ltd have made every effort to meet the client's brief. However, no survey ensures complete and absolute assessment of the changeable natural environment. The findings in this report were based on evidence from thorough survey: It is important to remember that evidence can be limited, hard to detect or concealed by site use and disturbance. When it is stated that no evidence was found or was evident at that point in time, it does not mean that species are not present or could not be present at a later date: The survey was required because habitats are suitable for a given protected species, and such species could colonise areas following completion of the survey.

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CONTENTS

NON-TECHNICAL SUMMARY	4
1 INTRODUCTION.....	6
2 METHODOLOGY.....	8
3 RESULTS	13
4 PROTECTED SPECIES – RESULTS AND EVALUATION.....	18
5 BIODIVERSITY NET GAIN ASSESSMENT	21
6 EVALUATION AND RECOMMENDATIONS	26
7 ECOLOGICAL CONSIDERATIONS AND ENHANCEMENTS.....	28
8 CONCLUSION.....	29
9 REFERENCES	30
10 BIBLIOGRAPHY.....	31
11 APPENDICES.....	32
Appendix A: Statutory designated wildlife sites within 7km	32
Appendix B: Non-statutory designated wildlife sites within 2km	35
Appendix C: Flora list identified during the walkover survey	36
Appendix D: Species legislation.....	37
Appendix E: Site photographs	39
Appendix F: Draft 'Proposed Site Plan Option' (JTP, 2023).....	41
Appendix G: Progress towards bng target conditions form	43

Non-technical Summary

Site:	Milton Place Car Park, Gravesham, Kent
Ordnance Survey National Grid Reference:	TQ 65241 74112
Report Commissioned by:	Gravesham Community Investment Partnerships LLP
Date of Walkover Survey:	2 nd July 2024

Considerations	Description	Method and timing
Statutory designated wildlife areas within 7km of the site:	Thirteen 'Sites of Special Scientific Interest' (SSSI) one 'National Nature Reserve' (NNR), one Ramsar site, one 'Special Protection Area' (SPA), one 'Local Nature Reserve' (LNR) and one Area of Outstanding Natural Beauty (AONB).	The proposed development site falls within the SSSI Impact Risk Zone for at least one of the SSSI but does not meet the criteria for consideration.
Non-statutory designated wildlife sites within 2km of the site:	Two Local Wildlife Sites (LWS).	There may be impacts from increased recreational activities (e.g. dog walkers) on non-statutory sites; however, suitable public open space (POS) is provided on site as well as adjacent recreational space to decrease any possible impact.
Results of walkover survey:	Habitats on the site comprised of amenity grassland, hardstanding, shrub/scrub, scattered trees and tree lines. The site is of low ecological value to high management and high levels of disturbance from public activities. The abandoned area within the south-western corner of the site provides more ecological value; however, this is isolated from other suitable habitat and is well-fenced, restricting access. Trees and shrub/scrub on site can be utilised by nesting birds.	Habitats present are common within the local landscape therefore their loss is not considered to result in a significant ecological impact. Loss of suitable nesting habitat for birds, but not considered to be significant.
Phase 2 surveys:	N/A	N/A
Precautionary measures:	Any clearance of hedgerow, tree or shrub/scrub.	Outside of the nesting bird season or following a clear nesting bird check. Main nesting season is from March to September.
Mitigation / enhancement	Habitat creation	Retention of trees where possible (during and post-construction) Habitat creation through native hedgerow and tree plantings and

Considerations	Description	Method and timing
		creation of wildflower grassland, where possible.
	Artificial provisions.	Installation of bird and bat boxes into/onto retained trees and new structures. Installation of hedgehog highways into any new fence panels on the northern boundary only.

1 Introduction

Background

- 1.1 James Blake Associates Ltd. (JBA) was commissioned by Gravesham Community Investment Partnerships LLP to undertake a Preliminary Ecological Appraisal (PEA) and provide an Ecological Impact Assessment (EclA) of Milton Place Car Park, Gravesham, Kent. Ordnance Survey National Grid Reference; TQ 65241 74112, taken from the centre of site.
- 1.2 The assessment was required to accompany a planning application for the development of 76 dwelling units, 61 flats and 15 houses, with associated landscaping and infrastructure.

Site Location and Description

- 1.3 The site is approximately 1.3 hectares in size and is located to the north of Ordnance road, west of Milton Place the eastern side of Gravesend town centre, located in Gravesham Borough in the County of Kent. The wider landscape includes the town of Gravesend, residential and commercial buildings and arable land. The River Thames (Gravesend reach) is approximately 0.3km north of the site (see Figure 1 below).
- 1.4 The site comprises the former BT depot site in the southwest corner, existing Council car park (148 spaces), an area of green space and the skatepark on the eastern corner of the site. The site is located within the Gravesend Town Centre Opportunity Area and also lies within the Milton Place Conservation Area.
- 1.5 The site itself mainly consists of hardstanding carpark and skate park, unused brownfield land, managed grassland, with hedgerows shrubs and boundary trees.

Figure 1: Site location (Reproduced from Magic maps data licence number 100022861)



Aims and objectives

1.6 The aim of the survey was to:

- Identify the presence, or potential presence, of any protected or notable species or habitats on, or adjacent to, the site; and
- make recommendations for further surveys if required, to advise on avoidance and/or mitigation measures following the survey (if necessary) and provide suggestions to enhance the wildlife value of the site post-development to provide a net gain in biodiversity value.

Wildlife Legislation and Planning Policy

1.7 The relevant wildlife legislations and planning policies are listed below:

- Conservation of Habitats and Species Regulations 2019, ('The Habitats Regulations'). The Habitats Regulations implement The Habitats Directive 1992 (92/43/EEC) into English Law. (Amended by the Conservation of Habitats and Species (Amendment) Regulations 2012 S.I. 2012/1927).
- Wildlife and Countryside Act, 1981 (as amended) (WCA). (Amended by the Countryside and Rights of Way Act (2000).
- The Natural Environment and Rural Communities Act, 2006 (NERC).
- The Protection of Badgers Act, 1992 (The Badgers Act).
- The Wild Mammals (Protection) Act, 1996.
- The Hedgerows Regulations, 2007.
- National Planning Policy Framework, 2023 (NPPF).

1.8 Relevant faunal legislation is summarised in Appendix D.

2 Methodology

Desk study

- 2.1 A desk study was undertaken for statutory and non-statutory designated wildlife sites within a 7km and 2km radius of the site, respectively using 'MAGIC', the Multi-Agency Geographic Information system for the Countryside. The data provided from The Kent & Medway Biological Records Centre (KMBRC) was consulted for records of non-statutory sites and protected and rare species within a 2km search radius (KMBRC data provided on the 31st July 2024). The search with MAGIC also supplemented the data search through providing records of granted licence applications and licence returns for European Protected Species such as bats and great crested newts, where necessary.
- 2.2 The site is covered by the Local Biodiversity Action Plan (LBAP) for Kent which was consulted as part of the desk study.
- 2.3 Within the desk study results, the Birds of Conservation Concern (BoCC) are split into three criteria; the Red list is the highest conservation priority (species needing urgent action). The Amber list is the next most critical group, followed by Green. Red listed species are those that are globally threatened according to the International Union for Conservation of Nature (IUCN) criteria, species with populations or ranges that have declined rapidly in recent years, and those that have declined historically and have not shown a substantial recent recovery.

Walkover Survey

- 2.4 The survey was undertaken by Sasha Edhouse BSc (Hons) on the 2nd July 2024.
- 2.5 The survey methodology followed the standard Phase 1 methodology of Joint Nature Conservation Committee Guidelines (JNCC, 2010) and/or UK Habitat Classification Version 2.0 (2023). An extension of this basic methodology was also undertaken to provide further details in relation to notable or protected habitats present within the survey area, or in relation to habitats present that have the potential to support notable or protected species (CIEEM, 2017).
- 2.6 **Badgers (*Meles meles*):** A visual survey for setts, hair, latrines, prints, snuffle marks or other signs of badgers was undertaken within the site boundary, following guidelines set out by the Mammal Society (1989). The assessment also made judgement on the site's suitability for supporting foraging activity by this species.
- 2.7 **Bats:** In line with guidance set out within the Bat Conservation Trust's Guidelines (Collins (ed.), 2023), trees (where present), were subject to assessment, to appropriately categorise the features in relation to their suitability in supporting roost bats. Typically, the assessment involved the surveyor using binoculars, ladder and endoscope (where appropriate; i.e. if licensed or accompanied by Level 2 licensed surveyor), for any features present that could be

used by this group or evidence of bat occupation. Evidence can include the following; presence of live bats, droppings, urine staining and oil staining.

- 2.8 For trees, features of interest includes lifted bark, mature ivy, cankers, woodpecker holes, hazard beams and wounds.
- 2.9 Further consideration was also given to the site's suitability in supporting foraging and commuting bats, through the presence of vegetative features and their connectivity to other suitable habitat within the local environment.
- 2.10 Subsequent grading followed the descriptions given in Table 4.1 and 4.2 of the BCT guidelines. See Tables 1 and 2 below.

Table 1: Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape

Potential suitability	Description	
	Roosting habitats in structures	Potential flight-paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).	Habitat that could be used by small numbers of bats as flight-paths such as gappy hedgerow or unvegetated stream, but isolated i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a path of scrub.
Moderate	A structure 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 status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of tree and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for	Continuous, high-quality habitat that is well connected to the wider landscape that is likely

Potential suitability	Description	
	Roosting habitats in structures	Potential flight-paths and foraging habitats
	use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation roosts e.g. maternity or classic cool/stable hibernation site.	to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

Table 2: Guidelines for assessing the suitability of trees on proposed development sites for bats

Suitability	Description
NONE	Either no PRFs (potential roost feature) in the tree or highly unlikely to be any
FAR	Further assessment required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

- 2.11 **Other mammals:** The site's suitability for 'other' mammals, particularly those of conservation priority (such as BAP species) was also considered during the assessment. Typical species include hedgehog (*Erinaceus europaeus*) and harvest mouse (*Micromys minutus*). Any signs of presence was recorded such as nest and droppings.
- 2.12 **Birds:** The site's suitability in supporting both nesting and wintering birds was undertaken, with particular attention on whether it could support species of conservation priority; i.e. Schedule 1 birds, NERC Priority Species, BoCC amber/red listed and local BAP species. Birds can occupy a wide range of habitats, and typically, habitats with notable structure and diversity (e.g. broadleaved woodland, wetlands, saltmarsh etc.), are typical in supporting important bird populations, however, non-complex habitats such as arable fields, hedgerows, dense scrub etc. can be just as important, and are able to support important assemblages of both breeding and wintering birds. During the assessment, all identifiable species both within the red line boundary and immediate vicinity were recorded. Notes were also made on the presence of any historic or current nest sites.
- 2.13 **Reptiles:** The site's suitability in supporting reptiles was carried out in line with the Froglife Advice Sheet 10 (1999) guidance. The habitat preference between the common species of reptiles (grass snake *Natrix helvetica*, common lizard *Zootoca vivipara* and slow-worm *Anguis fragilis*) vary somewhat, but can be typically viewed as the following; rough grassland, scattered scrub, allotments, roadside verges, woodland rides, and heathland, whilst species such as adder (*Vipera berus*) are generally more specific in their requirements preferring sites of loose

substrate such as heathland and sand dune systems. Smooth snake and sand lizard receive a higher level of protection, and are considerations of sites (such as heathland) localised around areas in Dorset, Devon, Hampshire, West Sussex and Surrey and few other English coastal sites.

2.14 If undertaken during the active reptile season, any suitable refugia and suitable basking locations was subject to a visual inspection, to account for any reptiles that could be present. Obvious signs of occupation includes live animals and sloughs.

2.15 **Amphibians:** Where accessible, known waterbodies within 250m of the site (unless ecologically separated from the site by significant barriers, such as major roads or rivers) were assessed for potential to support breeding amphibians, such as great crested newts (GCN) (*Triturus cristatus*). Waterbodies were assessed for their potential suitability to support GCN by undertaking a Habitat Suitability Index (HSI) assessment (Oldham *et al.*, 2000). The HSI for GCN is assessed using ten habitat variables (suitability indices – SI) which are known to affect the survival and ability to breed, of GCN. The variables include:

- Geographical location.
- Pond area.
- Pond permanence (number of years a pond is likely to dry out per decade).
- Water quality.
- Percentage of shade of margin.
- Number of waterfowl.
- Occurrence of fish.
- Pond density.
- Terrestrial habitat.
- Macrophyte (plant) cover.

Each variable (or suitability index) is assessed in the field and expressed on a scale from 1 (optimal suitability for GCN) to 0 (totally unsuitable). The ten variables, or indices, are combined using geometric mean to derive the final HSI score for the waterbody. The scoring system is presented in Table 3 below:

Table 3: HSI score and suitability of a waterbody habitat to support breeding GCN

HSI Score	Suitability of water body habitat to support breeding GCN
0.01-0.49	'Poor'
0.50-0.59	'Below average'
0.60-0.69	'Average'
0.70-0.79	'Good'
0.80-1.00	'Excellent'

- 2.16 An assessment of the site's suitability in supporting the terrestrial phase of this species was also given. Typical habitats can includes grassland, scrub, woodland, arable field margins (where substantial) and allotments. This followed guidance as set out within the Great Crested Newt Conservation Handbook (Langton *et al.*, 2001).
- 2.17 **Invertebrates:** The site was scoped for significant rotting deadwood, and high quality aquatic or other habitats, which could be used by significant assemblages of invertebrates, or by any of the invertebrates highlighted in the data search.
- 2.18 **Flora and habitats:** All habitats and plant species that were identifiable at the time of the survey were recorded.
- 2.19 **Adjacent Habitat:** Habitats close to the site were identified, using aerial maps and field observation, so that the ecological impact of the proposed works on the wider landscape could be assessed.

Limitations and Assumptions

- 2.20 The baseline conditions reported in this document represent those identified at the time of the survey on 2nd July 2024. Although a reasonable assessment of habitats present can be made during a single walkover survey, seasonal variations are not observed. The survey was conducted in July, which is within the optimal season for the identification of flora.
- 2.21 The desk study used available records and historical data from the local area. However, this does not provide a reliable indication of species present since records depend entirely on survey effort in the area, which is highly variable. The data is useful as a general guide to supplement the site visit, but absence of records does not reflect absence of species.

3 Results

Desk Study

Statutory Designated Wildlife Sites

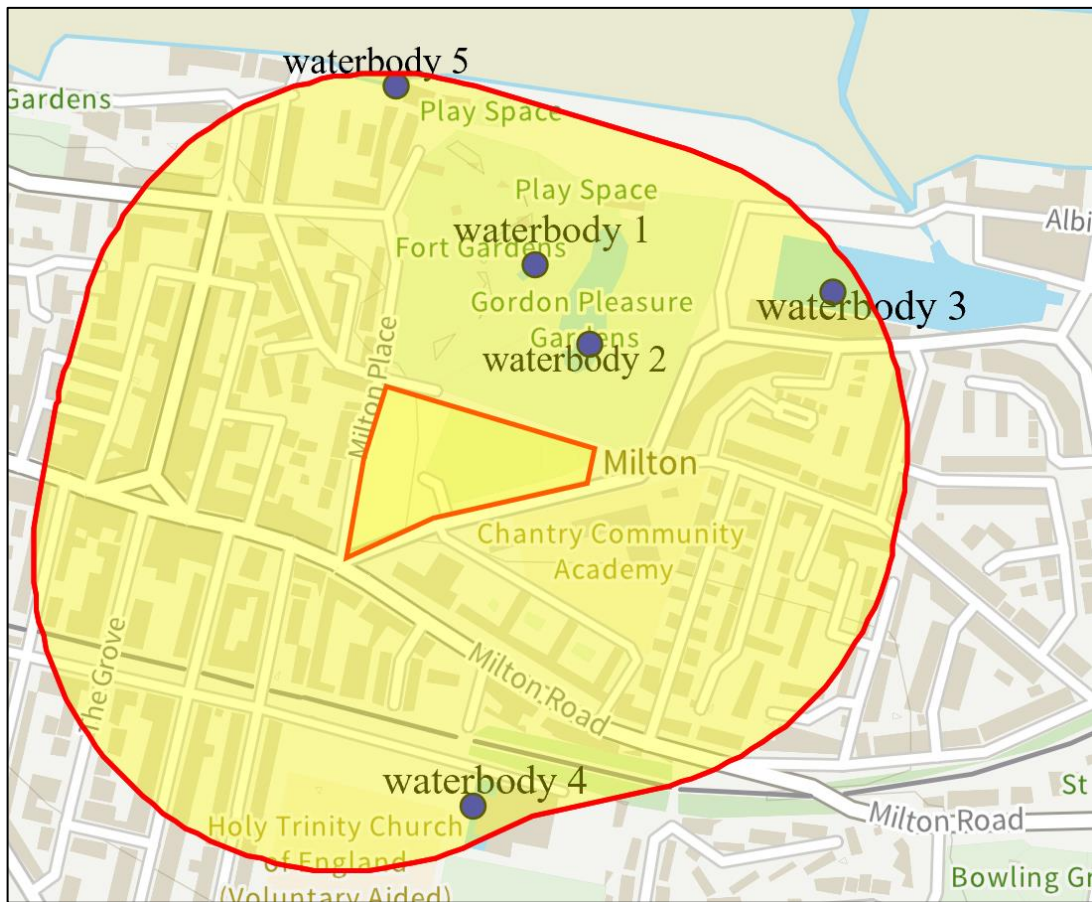
- 3.1 Thirteen 'Sites of Special Scientific Interest' (SSSI) one 'National Nature Reserve' (NNR), one Ramsar site, one 'Special Protection Area' (SPA), one 'Local Nature Reserve' (LNR) and one Area of Outstanding Natural Beauty (AONB) were identified within 7km of the site. A full list of the Statutory designated sites including their relevant citations and approximate distance from the site is detailed in Appendix A.
- 3.2 The proposed development site is within the Impact Risk Zones (IRZ) for at least one SSSI. However, the development does not fall under the IRZ criteria that would likely trigger consultation between the Local Planning Authority (LPA) and Natural England.

Non-Statutory Designated Wildlife Sites

- 3.3 There were two non-statutory designated wildlife sites identified within 2km of the site; both of which are Local Wildlife Sites (LWS). These are detailed in Appendix B.
- 3.4 There may be impacts from increased recreational activities (e.g. dog walkers) on non-statutory sites; however, suitable public open space (POS) is provided on site as well as adjacent recreational space to decrease any possible impact.

Waterbodies within 250m

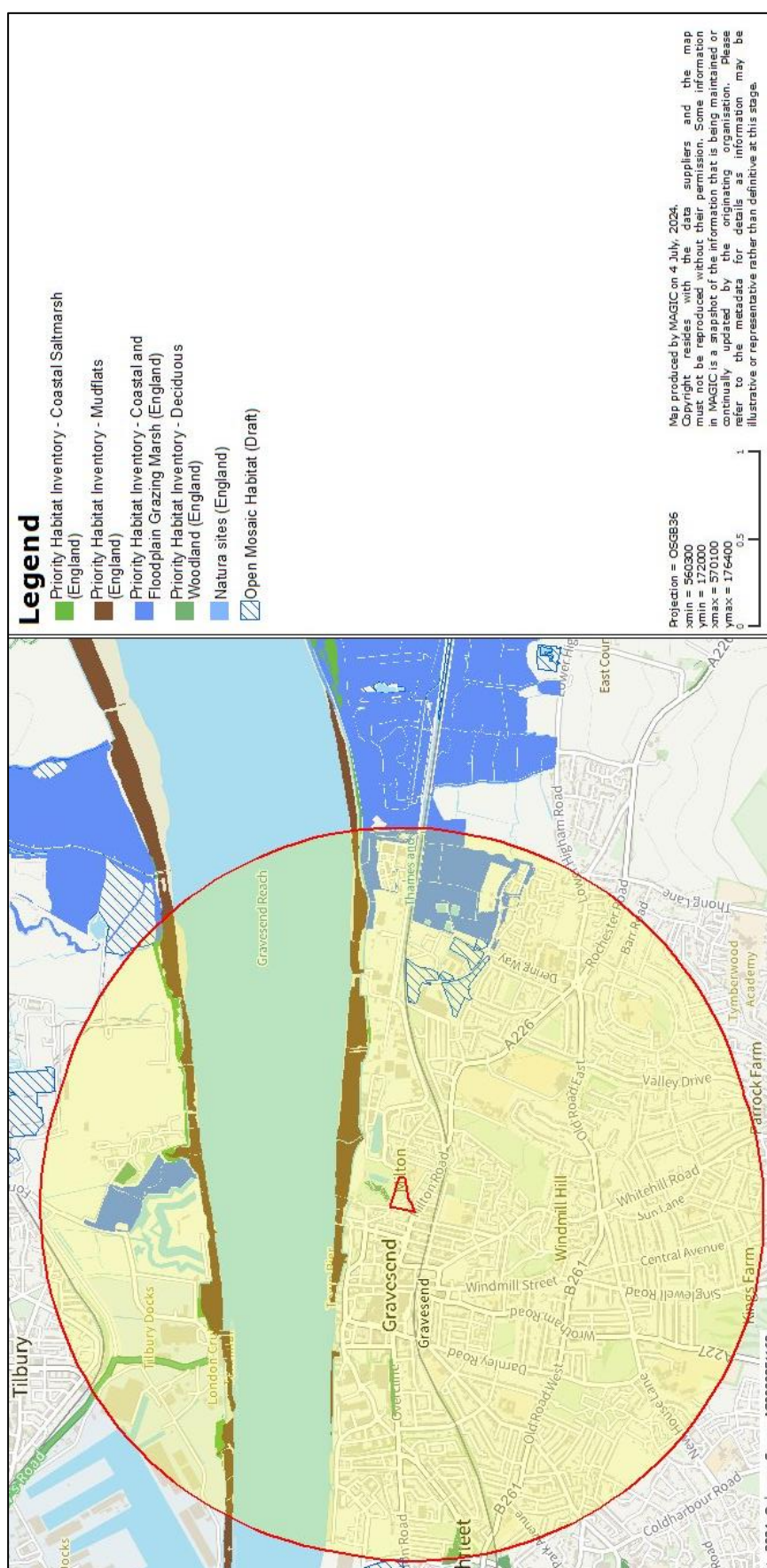
- 3.5 Five waterbodies were identified within 250m of the site boundary (Figure 2). Waterbodies are located as followed:
- Waterbody 1 – A pond located 117m north of site
 - Waterbody 2 - A Pond 45m north of the site
 - Waterbody 3 - A canal basin 190m northeast of the site
 - waterbody 4 - a water feature 205m south of the site
 - Waterbody 5 – Edge of The Themes 243m north of the site.

Figure 2: Waterbodies within 250m of the site boundary

Habitat Types within 2km

- 3.6 Habitat types within the area include coastal marsh, floodplain grazing marsh, mudflats, deciduous woodland and open mosaic habitat. Habitat types are shown on Figure 3. The nearest broadleaved woodland is located 20 north with mudflats further north (276m).

Figure 3: Habitat types within 2km of the site



Protected, priority and rare species within 2km of site

- 3.6 There were no records of protected or rare species for the site itself; although there were numerous records of species within 2km of the site (full raw data can be provided upon request). The most relevant records are described in Table 4 below. Records over ten years old have not been referred to as the walkover survey is considered to provide a more up to date and accurate account of the species and habitats for the site.

Table 4: Protected species records

Fauna	Subdivision of faunal group	Number of records	Date of most recent record	Closest record to the site	Notes (including details of relevant EPS licences)
Bats	Common pipistrelle	28	2021		-
	Soprano pipistrelle	7	2021		-
	Brown long eared	13	2022		-
	Daubenton's Bat	15	2021		-
	Leisler's Bat	3	2018		-
	Noctule	4	2021		-
	Myotis species	1	2021		-
	Natterers	14	2020		-
	Nathusius' Pipistrelle Bat	2	2021		-
	Whiskered/Brandt's	4	2020		-
Birds	Red listed	29	2019	-	-
	Amber listed	61	2019	-	-
Reptiles	Slow-worm	28	2021	-	-
Invertebrates		1	2018	2 km E	-

Walkover Survey

- 3.7 The habitats on site were considered with respect to their potential to support protected species.
- 3.8 Within the redline boundary the site comprises a number of dominant 'habitat types', taken from those listed in the Handbook for Phase 1 Habitat Survey (JNCC, 2010). These habitat types are described below and are shown schematically on Figure 4. Target Notes (TN) are presented in Table 5. A list of plant species identified on site is included in Appendix C. The baseline conditions reported and assessed in this document represent those identified at the time of the survey on 2nd July 2024. Although a reasonable assessment of habitats present can be made during a single walkover survey, seasonal variations are not observed.
- 3.9 The majority of the site comprises amenity grassland. Other habitats present on site are scrub, boundary trees and hardstanding.

Figure 4: Phase 1 Habitat Map

4 Protected Species – Results and Evaluation

Badger

- 4.1 The habitats on the site were largely unsuitable with respect to badger sett creation and foraging. Areas of scrub within the abandoned area at the south-western boundary of the site could provide shelter and sett creation; however, this habitat is limited and the fencing surrounded this appeared to be fully intact, restricting access.
- 4.2 Furthermore, the entire site is subject to high levels of disturbance from public activities. At the time of the survey, the grassland area was being utilised as a fairground. Gordon Pleasure Gardens is located immediately to the north, but again, this is subject to high levels of disturbance from the public.
- 4.3 No setts or evidence of badger activity with regard to hair, latrines or snuffle holes were recorded on the site itself during the survey.

Bats

- 4.4 No buildings are present on-site. The scattered trees (Figure 4) were assessed from the ground for bat roost potential. However, all trees are considered to have 'negligible' bat roost potential (BRP) due to no suitable features present, such as dense ivy cover, peeling bark or knot holes.
- 4.5 Habitat on site was assessed as 'negligible' to 'low' for foraging and commuting bats. There is good connectivity to the Gordon Pleasure Gardens to the north; however, the site itself is well-managed with minimal foraging habitats and subject to high levels of disturbance such as the fairground present at the time of the survey and surrounding roads and car parking.

Mammals - Other

- 4.6 The site provides some habitat for hedgehog due to scrub, hedgerow and amenity grassland that could provide shelter and foraging opportunities, although limited. Furthermore, as noted above, the fencing surrounding the abandoned area to the south-west was fully intact and would restrict use of this area. No evidence of hedgehog was recorded during the walkover survey.
- 4.7 No evidence of other protected or priority mammal species were noted during the walkover survey.

Birds

- 4.8 Trees and shrub on site provide nesting and foraging opportunities for birds. The amenity grassland is considered unsuitable for ground nesting birds due to the current high management (mown) and high levels of disturbance from public activities.

Reptiles

- 4.9 The majority of the site is managed amenity grassland which currently does not provide good habitat for reptiles. However, if the grassland is left to grow up then the area will become suitable in the future.
- 4.10 The shrub cover located in the south-west corner of the site could provide sheltering and hibernation opportunities, however this is located on hardstanding and is isolated from the other habitats on site. Furthermore, this habitat has established over the past few years (previously car parking) and given the urban setting of the site, it's considered unlikely a reptile population has colonised in the interim.

Amphibians

- 4.11 Five waterbodies were identified during the desk study search within 250m of the site boundary.
- 4.12 Waterbody 1 and 2 was subject to a HSI assessment and is considered to have 'poor' suitability for breeding GCN (see Table 5).

Table 5: HSI Score

HSI Variable	Waterbody 1		Waterbody 2	
	Field Score	SI Value	Field Score	SI Value
Location	Zone A	1	Zone A	1
Pond area (m ²)	375	0.75	>2000	0.8
Pond permanence	Sometimes dries	0.5	Never dries	0.9
Water quality	Moderate	0.67	Moderate	0.67
Shade %	0-60	1	0-60	1
Waterfowl	Major	0	Major	0
Fish	Minor	0	Minor	0
Pond density	6	0.84	6	0.84
Terrestrial Habitat	Moderate	0.67	Moderate	0.67
Macrophyte cover %	91-95	0.85	26-30	0.6
HSI value	0.457		0.471	
Pond Suitability	Poor		Poor	

- 4.13 Waterbody 3 to 5 were considered unsuitable for GCN once inspected during the walkover survey. Waterbody 3 is a docking yard/marina with high brick walls surrounding the water, so dispersal in and out of this area would be difficult. Furthermore, the marina is subject to tidal fluctuations.

- 4.14 Waterbody 4 was a large water feature with no permanent water present; furthermore, this was considered ecologically separated from the site due to the extent of buildings and hardstanding, as well as a railway track.
- 4.15 Waterbody 5 is the edge of The Themes, rather than a ditch or a separate watercourse which is considered unsuitable for breeding GCN.
- 4.16 Majority of the site is considered unsuitable for GCN; there is limited opportunities for sheltering and hibernation and the grassland is well managed and subject to high levels of disturbance.

Invertebrates

- 4.17 The habitats on the site are unlikely to support a diverse assemblage of invertebrates. However, the scrub/shrub area to the south-west of the site has potential habitat for invertebrates such as butterflies, although this is very limited.
- 4.18 No rare or protected invertebrate species were observed during the walkover.

Flora

- 4.19 No rare, principally important, local BAP or protected plant flora was identified during the walkover survey.
- 4.20 Schedule 9 invasive plant species such as Japanese knotweed (*Fallopia japonica*) were not identified at the site during the walkover survey. However, buddleia (*Buddleja davidii*) was identified on site which can be considered an invasive species but is not listed on Schedule 9.

5 Biodiversity Net Gain Assessment

- 5.1 As part of the EclA, a biodiversity net gain (BNG) assessment has been undertaken. This assessment explains how the net gain calculation was carried out, the assumptions made and the conclusions from the calculation.
- 5.2 Only habitats/linear features currently and proposed within the site boundary have been included within the calculations. The post development habitats have been based on the proposals set out in the 'Landscape General Arrangement plan' (FPCR, 2025) which is provided in Appendix F.

Background

- 5.3 A biodiversity net gain calculation has been carried out using Defra Biodiversity Statutory Metric (updated March 2023). For more information on the metric, please see [here](#).
- 5.4 Defra's Biodiversity Statutory Metric provides a way of measuring and accounting for biodiversity losses and gains resulting from development or land management change. The metric encompasses both area (e.g. grasslands) and linear habitats (such as hedgerows, rivers and streams). Note that 'material' enhancements for species, such as bat/bird boxes, reptile hibernacula, hedgehog 'highways' etc. cannot currently be factored into the calculation.
- 5.5 The habitats and linear features currently present within the site boundary are used to calculate the baseline biodiversity units; the percentage gain that the proposed development can potentially deliver is estimated using the draft 'Landscape General Arrangement plan' (FPCR, 2025) for the development and assumptions made by the assessor (Appendix F).
- 5.6 At present, national policy states '*To protect and enhance biodiversity and geodiversity, plans should:*
- a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national, and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
 - b) *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'* (NPPF, 2023).
- 5.7 The figure of 10% net gain as the minimum has now been highlighted as mandatory with the emerging Environment Bill, from February 2024 for major development and from April 2024 for small developments.

Methodology and Evaluation

5.8 The baseline figures for the metric calculation were based on the EcIA site survey undertaken by JBA on 2nd July 2024. The area measurement for each of the baseline habitat types was made using QGIS version Grenoble 3.38.1.

5.9 The baseline habitats and linear features consist of those detailed in Table 6 and 7, respectively, the impact of each habitat has also been provided in figure 4.

Table 6: Habitat baseline and impact

Habitat	Area (ha)	Impact
Developed land; sealed surface	0.7046	Retain/Loss
Modified grassland	0.57	Retain/loss
Introduced shrub	0.0254	Loss
Urban Tree (19 small and 2 large)	0.1506	Loss

Table 7: Linear baseline and impact

Linear Feature	Length (km)	Impact
Non-native and ornamental hedgerow	0.064	Loss

5.10 The strategic significance of the location was checked against the 'Local Plan' of Gravesham Borough and Kent. The location did not appear to be in or near to a locality mentioned in the Strategy.

5.11 The areas of habitat to be created were taken from the 'Landscape General Arrangement plan' (FPCR, 2025) (Appendix F). Proposed habitats are provided in Table 8 and proposed linear habitats such as hedgerow are shown in Table 9.

Table 8: Proposed habitat creation

Habitat	Area (ha)	Condition	Further details
Introduced shrub	0.057	Condition Assessment N/A	Ornamental shrub planting
Vegetated garden	0.075	Condition Assessment N/A	
Developed land; sealed surface	0.343	N/A - Other	
Other neutral grassland	0.01	Moderate	Wildflower planting
Sustainable drainage system	0.026	Moderate	
Mixed scrub	0.135	Moderate	Native shrub planting
Urban tree	0.3949	Moderate	97 trees

Table 9: Proposed hedgerow/linear features

Habitat	Length (km)	Condition	Further details
Native hedgerow	0.179	Moderate	Proposed hedgerow planting

Results

5.12 The overall result is a net gain in biodiversity of **18.11%** for habitat units and **836.20%** for linear hedgerow units. However, in order to achieve this BNG percentage, the conditions noted in Tables 8 and 9 will need to be maintained for a period of 30 years. A Habitat Management and Monitoring Plan (HMMP) and supplementary ecological management plans may be required to secure the potential benefits for biodiversity in perpetuity.

5.13 Table 10 below offers some general guidance for the proposed habitat creation and management and how to achieve the targeted conditions.

Table 10: General guidance for targeted condition(s)

Habitat
Modified grassland
Planting/management measures
The grassland should be managed to achieve the following characteristics; • There are at least 6 vascular plant species per m². • Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed • Cover of bracken is less than 20% and cover of scrub (including bramble) is less than 5%. • Absence of invasive non-native species.
Habitat
Other Neutral grassland
Planting/management measures
The grassland should be managed to achieve the following characteristics; • Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed • Cover of bracken is less than 20% and cover of scrub (including bramble) is less than 5%. • Absence of physical damage.
Habitat
Native hedgerow
Planting/management measures
Planting and management of new hedgerow to meet the following criteria over time; • >1.5 m average height along length • >1.5 m average width along length • Gap between ground and base of canopy <0.5 m for >90% of length • Gaps make up <10% of total length; and no canopy gaps >5 m

• >1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length • >90% of the hedgerow or undisturbed ground is free of damage caused by human activities
Habitat
Urban tree
Planting/management measures
Planting and management of new trees to meet the following criteria over time; • Native species • There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.
Habitat
Mixed scrub
Planting/management measures
The scrub should be managed to achieve the following characteristics; • There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA5) and species indicative of suboptimal condition make up less than 5% of ground cover. • At least 80% of scrub is native • There are at least three native woody species, • No single species comprises more than 75% of the cover (except hazel <i>Corylus avellana</i>, common juniper <i>Juniperus communis</i>, sea buckthorn <i>Hippophae rhamnoides</i> (only in its restricted native range), or box <i>Buxus sempervirens</i>, which can be up to 100% cover. • Seedlings, saplings, young shrubs and mature shrubs are present.

Conclusions

5.14 Based on the 'Landscape General Arrangement plan' (FPCR, 2025) and assessor assumptions, it is concluded that the scheme can deliver an overall biodiversity net gain of **18.11%** for habitat units and **836.20%** for linear hedgerow units, providing the above management prescriptions are followed.

5.15 The above results clearly show that the proposed masterplan provides sufficient areas of public open space to incorporate natural habitats into the landscaping design capable of achieving a minimum 10% net gain in biodiversity value.

Monitoring

5.16 Details as to how the biodiversity mitigation and enhancements will be implemented including a timetable for delivery and a plan for the long term management of the mitigation and enhancements should be set out within a Habitat Management and Monitoring Plan (HMMP). The HMMP is a detailed plan that outlines how the land will be managed over at least 30 years to create and enhance habitats for biodiversity net gain (BNG) and manage and monitor the BNG.

- 5.17 On site monitoring is required in order to ensure the created habitats achieve the desired conditions within the expected target time. It is therefore considered that monitoring visits will be required during years 1, 2, 5, 10, 20 and 30.
- 5.18 Monitoring should be undertaken by an ecologist who is competent in undertaking BNG metric condition assessments.
- 5.19 A form to be completed in each monitoring year can be found in Appendix G, which will aid in the monitoring of progression towards target conditions of each habitat. The form and audit report will be submitted to the LPA after each monitoring visit.
- 5.20 Any remedial measures should be appended to this enhancement strategy.
- 5.21 Ongoing management is to be implemented by the Landowner / Site Management Team and suitable appointed contractors, such as landscape contractors. BNG habitat monitoring should be undertaken by a suitability qualified ecologist appointed by the landowner, as appropriate.

6 Evaluation and Recommendations

6.1 Table 11 below includes a summary of all identified and potential ecological constraints to the development, including those where there is insufficient information at the time of survey to be definitive.

Table 11: Survey evaluation, relevant legislation and recommendations

Ecological Receptor	Summary of desk study and walkover survey	Likely impact and recommendations for further survey
Designated wildlife areas - statutory	The desk study identified thirteen SSSI, one NNR, one Ramsar site, one SPA, one LNR and one AONB within 7km of the site. These are detailed in Appendix A.	The site is within several IRZ for SSSI's; however, the development does not meet the qualifying criteria for likely consultation between the LPA and NE.
Designated wildlife areas – non-statutory	Two LWS.	There may be impacts from increased recreational activities (e.g. dog walkers) on non-statutory sites; however, suitable POS is provided on site as well as adjacent recreational space to decrease any possible impact.
Habitats	Habitats on the site comprise: • Amenity grassland; • Hardstanding; • Tree line; • Introduced shrub; • Scattered trees; • Ornamental hedgerow; and • Scattered scrub.	No habitats on site are NERC Priority Habitats. No further assessment required.
Badger	There was no evidence of badger activity on site during the walkover survey and the site itself is considered largely unsuitable.	No further survey considered necessary.
Bats	No buildings present on site and all trees have 'negligible' BRP. The site was considered to have 'negligible' to 'low' suitability for foraging and commuting bats due to limited habitats.	No further survey considered necessary.
Mammals - other	No evidence of hedgehogs was found during the walkover survey and the site is largely unsuitable.	No further survey considered necessary.
Birds	Trees and shrubs on site are suitable for nested birds; however, no nests were identified on site during the walkover.	It is recommended that any vegetation clearance and disturbance is undertaken outside of the nesting season. The nesting season is deemed to be from March to September, although these times can be temperature dependent. If this timing is not possible then a nesting bird check must be carried out by a suitably experienced person, no more than 48 hours between the check and the removal. If the 'all clear' is given, then removal/works can commence. The survey lasts for no longer than 48 hours. If works are not completed in this time frame, then a re-survey will need to be carried out.

Ecological Receptor	Summary of desk study and walkover survey	Likely impact and recommendations for further survey
		If birds are found to be nesting, then no works should be undertaken within at least 10m of the nest until chicks have fledged.
Reptiles	Habitats on site are considered unsuitable for reptiles, at present, due to management and high levels of disturbance.	No further survey considered necessary.
Amphibians, particularly GCN	Five waterbodies were identified within 250m of the site boundary; however, waterbody 3 to 5 were considered ecologically separated or not suitable for breeding GCN. Waterbody 1 and 2 was assessed as having 'poor' HSI. Furthermore, the site itself is considered largely unsuitable for the species.	No further survey considered necessary.
Invertebrates	The habitats on site are unlikely to support a diverse assemblage of invertebrates.	No further survey considered necessary.
Flora	The habitats on site are unlikely to support any rare or protected flora. No Schedule 9 listed species were located during the walkover survey.	No further survey considered necessary.

7 Ecological Considerations and Enhancements

- 7.1 The proposed development is considered unlikely to be adversely detrimental to designated areas, protected species or habitats, provided the recommendations are followed in Table 11. However, a number of considerations and enhancements are recommended with respect to the overall biodiversity of the site in line with current Planning Policy; see Table 12.

Table 12: Mitigation and enhancement table

Ecological Receptor	Recommended Mitigation / Enhancement Measures
Habitats	The recommendations within the BNG assessment of this report (section 5) should be followed in order to achieve at least 10% net gain for habitats and linear features; in brief this includes enhancing areas of retained grassland, hedgerow planting, tree planting, and wildflower areas.
Bats	Bat boxes / tubes / tiles The addition of bat boxes could also be installed on retained trees and proposed new buildings to provide roosting opportunities for common species. Bat boxes should be at least 3m high and between facing south-east to south-west.
Mammals - other	Hedgehog highways As the site is surrounded by roads on the west, south and eastern side, it would not be suitable to supply hedgehog highways on these boundaries; however, they could be installed on the northern boundary which lays adjacent to Gordon Pleasure gardens. Hedgehog highways consisted of 13cm diameter gaps at the base of fences enable small mammals to move through the development.
Birds	Bird boxes / Bird Towers The addition of standard bird boxes on retained trees and proposed new buildings will attract a greater diversity of birds to nest. A number of 1SP Schwegler sparrow terraces should be installed onto new builds. These should be located out of direct sunlight and close to but not restricted by vegetation. A number of Schwegler Swift Bricks should also be installed on the periphery of the new builds.

8 Conclusion

- 8.1 An Ecological Impact Assessment was undertaken at Milton Place Car Park, Gravesham, Kent by James Blake Associates Ltd. in support of a planning application for residential dwelling units and associated infrastructure.
- 8.2 The majority of the site comprises amenity grassland with hardstanding comprising of car parking areas, pathways and a skate park area, scattered/boundary trees and scrub.
- 8.3 Due to the low ecological value of the site, no further surveys are considered necessary; however, precautionary measures for vegetation clearance in relation to active bird nesting should be followed in full.
- 8.4 As part of the EcIA, a biodiversity net gain (BNG) assessment has been undertaken. Based on the 'Landscape General Arrangement plan' (FPCR, 2025) and assessor assumptions, it is concluded that the scheme can deliver an overall biodiversity net gain of **18.82%** for habitat units and **836.20%** for linear hedgerow units, providing the above management prescriptions are followed.
- 8.5 It is considered that the development is able to proceed with minimal impact on the local conservation status of any protected, principally important or rare species within the area.
- 8.6 It is also considered that with a sensitive landscape scheme, and by including some, or all, of the additional enhancements, the site could be improved for local wildlife post development and achieve at least 10% biodiversity net gain.

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11 Appendices

Appendix A: Statutory designated wildlife sites within 7km

Site Name	Designation	Distance From Site	Description
Thames Estuary And Marshes	Ramsar, SSSI	1.9km east	The South Thames Estuary and Marshes SSSI from Gravesend to the eastern end of the Isle of Grain forms a major component of the Greater Thames Estuary. The site consists of an extensive mosaic of grazing marsh, saltmarsh, mudflats and shingle characteristic of the estuarine habitats of the north Kent marshes. Freshwater pools and some areas of woodland provide additional variety and complement the estuarine habitats. The site supports outstanding numbers of waterfowl with total counts regularly exceeding 20,000. Many species regularly occur in nationally important numbers and some species regularly use the site in internationally important numbers. The breeding bird community is also of particular interest. The diverse habitats within the site support a number of nationally rare and scarce invertebrate species and an assemblage of nationally scarce plants.
Swanscombe Peninsula	SSSI	3.7km west	Swanscombe Peninsula SSSI is a corridor of habitats connecting Ebbsfleet Valley with the southern shore of the River Thames between Dartford and Gravesend. Industrial processes such as engineering, power generation, landfill and dredging have left a legacy of low nutrient and often toxic substrates which have developed into bare open ground habitats with low scrub cover. The peninsula also supports wetland, grazing marsh and saltmarsh habitats. These habitats, coupled with a mild climate, provide ideal conditions for certain species and assemblages of plants, invertebrates and breeding birds. Four chalk pits are included within the boundary of the SSSI and, in addition to the habitats described above, contribute to the varied topography,
Kent Downs	AONB	3.7km south	Landscape features of particular note include south facing steep slopes of chalk and greensand; scalloped and hidden dry valleys, expansive open plateaux, broad steep-sided river valleys and the dramatic, iconic white cliffs and foreshore.
Shorne And Ashenbank Woods	SSSI	3.8km west	Shorne and Ashenbank Woods form a complex of ancient and plantation woodland, and include a variety of stand-types associated with Tertiary gravels, clays and sands. The site supports an important and diverse invertebrate fauna, especially its Coleoptera (beetles), Hemiptera (true bugs), and Odonata (dragonflies).
Mucking Flats And Marshes	SSSI	4km north east	Mucking Flats and Marshes comprise an extensive stretch of Thames mudflats and saltmarsh, together with sea wall grassland. Wintering wildfowl and waders reach both nationally and internationally important numbers on the mudflats, roosting and feeding on adjacent saltmarsh and disused silt lagoons. The mudflats form the largest intertidal feeding area for wintering wildfowl and waders west of Canvey Island on the north bank of the Thames.
Globe Pits	SSSI	4.9km north west	Globe Pit is an important site for the interrelationship of archaeology with geology since it is vital in the correlation of the Lower Palaeolithic chronology with the Pleistocene Thames Terrace sequence. The site exposes gravel, apparently belonging to the Lynch Hill Terrace, containing a

Site Name	Designation	Distance From Site	Description
			prolific, uncontaminated Clactonian industry, implying an age much greater than its elevation suggests. This has led to considerable difficulties in interpretation, and the deposit has not been universally accepted as an in situ fluvial gravel. Later and younger "brickearth" is banked against this gravel remnant on its southern side. Comparison with other sites locally suggests that normal ideas of terrace stratigraphy cannot be applied in this area. The exposures in Globe Pit will therefore be of considerable importance for future research.
Swanscombe Skull Site	NNR, SSSI	5.3km west	Barnfield Pit, Swanscombe, the only site in the UK to yield unquestionable Lower Palaeolithic human remains, is probably the most famous and arguably the most important site in the British Pleistocene. In addition to its palaeoanthropological interest the site is of great importance for stratigraphy, palaeontology and Palaeolithic archaeology. For example, it is the only site in Britain which shows evidence of a Clactonian culture stratigraphically below an Acheulian culture and it therefore provides the basis for Lower Palaeolithic chronology in this country. The palaeontological record (molluscs, mammals and, somewhat controversially, pollen) provides evidence of climatic change, with at least one major interglacial represented. Within the sequence a major hiatus is recognised; the upper part of the beds below this level show the development of a fossil soil, which represents a further important aspect of the stratigraphic evidence at Swanscombe.
Hangmans Wood And Deneholes	SSSI	5.4km north west	Hangman's Wood deneholes, the remains of medieval chalk mines, provide the most important underground hibernation site for bats in Essex. Three species have been recorded; Brown longeared bat <i>Plecotus auritus</i> , Natterer's bat <i>Myotis nattereri</i> and Daubenton's bat <i>Myotis daubentonii</i> . Numbers of bats recorded have increased steadily since human access to the site was limited in 1985, and a total of 62 was recorded early in 1991. Hangman's Wood itself is included within the SSSI, as an area of semi-natural habitat in which bats can feed. It is a relict fragment of ancient woodland, dominated by Pedunculate Oak <i>Quercus robur</i> , Ash <i>Fraxinus excelsior</i> and Sycamore <i>Acer pseudoplatanus</i> with occasional Wild Cherry <i>Prunus avium</i> and Elm <i>Ulmus</i> sp
Great Crabbles Wood	SSSI	5.4km south east	This site is representative of woods on North West Kent Tertiary sediments; these comprise a succession of strata over Upper Chalk ranging from Blackheath gravels to Woolwich loams and Thanet sands, which give rise to a range of soil types. Most of the woodland is mixed coppice under oak standards, with sweet chestnut as the dominant species. A number of scarce plants occur, including lady orchid <i>Orchis purpurea</i> and man orchid <i>Aceras anthropophorum</i> .
Linford Wood	LNR	5.8km north east	The woodland consists of a hedgebank, mixed woodland willow plantation, ditches and open area. It is surrounded by arable farmland. The woods provide a habitat for wildlife including tawny owls, great spotted woodpeckers and green woodpeckers and is an oasis for migrant birds in spring and autumn.
Grays Thurrock Chalk Pit	SSSI	6.1km north west	Grays Thurrock Chalk Pit is situated in the SW of Essex. Active mineral extraction ceased in the early 1920s and since that time natural colonisation of the pit bottom has created a range of woodland, scrub and calcareous

Site Name	Designation	Distance From Site	Description
			grassland habitats that are important for the assemblage of invertebrate fauna they support
Cobham Wood	SSSI	6.5km south east	This woodland and old parkland is representative of woods in North Kent which occur in part on acidic Thanet Sands and in part on chalk soils. One nationally rare plant species occurs in the arable land close to the wood. An outstanding assemblage of plants is present at this site which is also of importance for its breeding birds.
Lion Pit	SSSI	6.6km north west	Lion Pit exhibits a complex sequence of Pleistocene Thames deposits overlying and banked against Chalk, representing the northern edge of the river's floodplain at the time of deposition (probably equivalent to the Lynch Hill or Taplow Terrace of the Middle Thames). The deposits have yielded molluscs, ostracods and pollen, and a mid-Levallois working site has been reported on the chalk surface at the foot of the fossil cliff. Since this section has not been stratigraphically related to the established Thames Terrace sequence it requires considerable further work, for which there is great potential.
West Thurrock Lagoon And Marshes	SSSI	6.7km west	West Thurrock Lagoon and Marshes is one of the most important sites for wintering waders and wildfowl on the Inner Thames Estuary. The combination of extensive intertidal mudflats together with a large and secure high tide roost, attracts waders in nationally important numbers, with significant populations of other bird species. The adjacent Stone Ness saltmarsh is noted for the size and character of its high marsh plant community. The mudflats form the single largest intertidal feeding area, for wintering waders and wildfowl, on the inner Thames estuary. In addition to providing a vital feeding area for the birds which roost on the lagoon, it is also regularly used as a low tide roost by migrant Common, Black and Arctic Terns, attracted by the rich food source around the warm water outfall from the adjacent power station.
Darenth Wood	SSSI	7km south west	This site comprises some of the most valuable areas of ancient seminatural woodland in north-west Kent and includes several rare woodland types. The invertebrate fauna has been exceptionally well studied during the last two centuries and the wood has long been famous as a site supporting many rarities. There are recent records of 2 nationally rare species and 32 nationally scarce species and historic records of a further 40 Red Data Book species and 200 nationally scarce species.

Appendix B: Non-statutory designated wildlife sites within 2km

Site Name	Designation	Distance from Site	Description
GR17 Canal & Grazing Marsh, Higham	LWS	1.5km east	Marsh designated for birds (no information provided)
Shorne Marshes RSPB	LWS	2.8km east	Marsh designated for birds (no information provided)

Appendix C: Flora list identified during the walkover survey

Common Name	Scientific Name
Tree/Shrubs	
Bradford pear	<i>Pyrus calleryana</i>
Old mans beard	<i>Clematis vitalba</i>
Bearberry cotoneaster	<i>Cotoneaster dammeri</i>
Butterfly bush	<i>Buddleja sp.</i>
Honeysuckle	<i>Lonicera sp.</i>
English oak	<i>Quercus robur</i>
Blackberry	<i>Rubus sp</i>
Japanese spindle	<i>Euonymus japonicus</i>
Mugwort	<i>Artemisia vulgaris</i>
Norway maple	<i>Acer platanoides</i>
Poplar	<i>Populus sp.</i>
Horse chesnut	<i>Aesculus hippocastanum</i>

Appendix D: Species legislation

Ecological Receptor	Legislation
Badger	Badgers and their setts are protected under the Protection of Badgers Act 1992 and also protected by the Wild Mammals (Protection) Act 1996. Protection also extends to include disturbance. Under the Protection of Badgers Act 1992, it is an offence to intentionally or recklessly: • Kill, injure or take badgers; • Damage a badger sett or any part of it; • Destroy a badger sett; • Obstruct access to, or any entrance of a badger sett; and Disturb a badger whilst it is occupying a badger sett.
Bats	All species of bat are afforded full legal protection under Schedule 5 of the WCA. They are also listed under Schedule 2 of the Habitats Regulations. Some species of bat are also listed in Section 41 of NERC Act as an SPI. Combined legislation makes it an offence: to deliberately kill, injure, capture/take a wild bat; intentionally or recklessly disturb bats, including whilst occupying a place of shelter or protection; to damage or destroy a place used by a bat for breeding or resting (does not need to be deliberate, reckless or intentional); and to intentionally or recklessly obstruct access to any place used by a bat for shelter or protection. Bats are classed as 'European Protected Species' (EPS) and mitigation will typically be undertaken under the auspices of an EPS licence from Natural England.
Hazel dormouse	The hazel dormouse is afforded full legal protection under Schedule 5 of the WCA. It is also listed under Schedule 2 of the Habitat Regulations and in section 41 of NERC as a species of Principal Importance. The hazel dormouse is classed as a 'European Protected Species' and mitigation will typically be undertaken under the auspices of a licence from Natural England.
Water vole	Water vole are protected under: • Schedule 5 WCA (full protection) • Section 41 NERC • Wild Mammals (Protection) Act 1996 • IUCN Red Data Book: Least Concern
Otter	Otter are protected under: • EC Habitats Directive Annex II & IV • Appendix II of The Bern Convention (1982) • Appendix 1 of CITES (1975) • Schedules 5 and 6 WCA (1981) • Near-threatened IUCN Global Red List (2010).
Other mammals	Hedgehogs are listed on Schedule 6 of the WCA which makes it illegal to kill or capture wild hedgehogs, with certain methods listed. The hedgehog is also a SPI under Section 41 of the NERC. All wild mammals are protected under the Wild Mammals (Protection) Act 1996. Offences relate to any act which results in the intent to inflict unnecessary suffering. Mercy killings and killing in a swift and humane way in the course of a lawful activity are not offences under the Act.
Birds	All wild birds while actively nesting are afforded legal protection under the WCA. Special protection is also afforded to birds listed on Schedule 1 of the WCA which makes it an offence to disturb these species at nest or the dependent young.

Ecological Receptor	Legislation
	Combined legislation means that all birds, their nests and eggs are protected by law and it is an offence, with certain exceptions, to: a) intentionally kill, injure or take any wild bird; b) intentionally take, damage or destroy the nest of any wild bird while it is in use or being built; c) intentionally take or destroy the egg of any wild bird; d) have in one's possession or control any wild bird (dead or alive), part of a wild bird or egg of a wild bird; e) intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building or is in, on or near a nest with eggs or young; or disturb the dependent young of such a bird; and f) have in one's possession or control any birds of a species listed on Schedule 4 of the Act unless registered in accordance with the Secretary of State's regulations.
Reptiles	Reptiles are afforded protection under Schedule 5 of the WCA from deliberate injury, killing and trade. They are also listed under Section 41 of NERC as an SPI.
Amphibians	GCN is afforded full legal protection under Schedule 5 of the WCA. It is also listed under Schedule 2 of the Habitats Regulations. This species is also listed under Section 41 of NERC as a species of Principal Importance. GCN are classes as a 'European Protected Species' and any necessary mitigation is typically undertaken under the auspices of a licence from Natural England

Appendix E: Site photographs

Description	Photo
Amenity grassland	 A photograph showing a grassy area next to a paved road. Several large trucks are parked on the grass, including a white DAF truck in the foreground and a large white semi-trailer truck in the background. The grass is green and appears to be a mix of wild and mown grass.
Southern boundary	 A photograph of a paved road running straight into the distance. On the left side of the road, there is a concrete wall or boundary. On the right side, there are trees and a few parked cars. The sky is overcast.
Ornamental hedgerow on western boundary	 A photograph of a dense, green hedgerow with yellow flowers. A green wheelie bin is visible behind the hedgerow. The hedgerow is located next to a paved area.
Skate park area to the east	 A photograph of a skate park area. In the background, there is a concrete skate ramp with graffiti. In the foreground, there is a grassy area and a paved path. A utility pole is visible on the left.

Description	Photo
Treeline on northern boundary	
On site car parking area	
Fenceline towards southern boundary	
Area to the south-western corner of the site	

Appendix F: 'Landscape General Arrangement plan' (FPCR, 2025)

Appendix G: Progress towards BNG target conditions form

Year	Have habitats been appropriately managed via maintenance schedule?	Have habitats met/maintained target condition? - If no, continue to next question.	Are habitats progressing towards target condition? - If no continue to next question.	What rectifying measures have been/can be taken to correct progress towards target condition?
1				
2				
5				
10				

Year	Have habitats been appropriately managed via maintenance schedule?	Have habitats met/maintained target condition? - If no, continue to next question.	Are habitats progressing towards target condition? - If no continue to next question.	What rectifying measures have been/can be taken to correct progress towards target condition?
20				
30				