



**Wildlife Trust
Consultancies**



Adonis Blue
ENVIRONMENTAL CONSULTANTS

Bocoda Hill Farm, Wrotham Road, South Street,
Meopham, DA13 0QG

Preliminary Ecological Appraisal



Adonis Blue Environmental Consultants

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Report Verification

Client	Chatranjan Seehra
Site	Bocoda Hill Farm, Wrotham Road, DA13 0QG
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Report Title	Preliminary Ecological Appraisal
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Quality Assurance

Report Version	Issue Date	Prepared By	Technical Review By	Final Review By
Final	24 June 2026	Jess Martin-Joiner BSc (Hons) Ecologist, ABEC	Gwilym Pask-Hale BSc (Hons), MSc, ACIEEM Senior Ecologist , ABEC	Anne Waite BSc (Hons), CBIol, MRSB Practice Manager, ABEC

This report has been prepared in accordance with British Standard 42020:2013 “Biodiversity, Code of practice for planning and development”

This report has been prepared by Adonis Blue Environmental Consultants for the sole use of the client.

All opinions expressed are the true and professional bona fide opinions of Adonis Blue Environmental Consultants. They do not constitute legal advice, and the client may wish to seek professional legal interpretation of the relevant wildlife legislation referenced in this report.

Any information provided by third parties and referred to within this report has not been checked or verified by Adonis Blue Environmental Consultants unless otherwise expressly stated within this document.

EXECUTIVE SUMMARY

- S.1. Adonis Blue Environmental Consultants (ABEC) was commissioned by Chatranjan Seehra in April 2026 to undertake a Preliminary Ecological Appraisal (PEA) of Land at Bocoda Hill Farm, Wrotham Road, South Street, Meopham, DA13 0QG (herein referred to as 'the site').
- S.2. The site extends to approximately 0.273 hectares and comprises of modified grassland (0.156ha), which is cut on an annual basis, areas of developed land, sealed surface (0.079ha), a stable and connecting hay storage (0.011ha) and artificial unvegetated, unsealed surface (0.028ha), comprising of an existing track. Linear features along the site boundaries comprise of species-rich native hedgerows with trees (0.095km) and a non-native and ornamental hedgerow (0.024km). One individual tree is within the site.
- S.3. The site is located approximately 7.5km northwest of West Malling. Land use within the surrounding area comprises farmland, grassland and woodland. To the east, the site is separated from grassland and woodland by A227 (South Street). To the south and west of the site are areas of grassland, arable fields and scattered woodland, to the north are scattered residential dwellings and two ponds interspersed with woodland and grassland.
- S.4. The proposed development is for the conversion of the existing stables into a residential dwelling with associated landscaped areas. The access to the north is proposed to be resurfaced with tarmac, and the field to the east is proposed to be planted as a wildflower meadow. All hedgerows and individual trees are to be retained.
- S.5. The existing stable and connected hay storage were found to have low suitability for roosting bats and one dusk emergence survey, to be undertaken within the survey period May to August, is recommended.
- S.6. Mitigation measures, without the need for further survey work, are recommended to avoid potential negative effects for nesting birds, hedgehog *Erinaceus europaeus*, badger *Meles meles*, great crested newts *Triturus cristatus*, reptiles, foraging and commuting bats, individual trees, hedgerows and invasive species (detailed within Section 9).
- S.7. Opportunities for ecological enhancement are detailed in Section 10.
- S.8. A summary of relevant legislation and planning policies is provided within Appendix A.
- S.9. Photographs of the site are included within Appendix B.

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1. INTRODUCTION

Background

- 1.1 Adonis Blue Environmental Consultants (ABEC) was commissioned by Chatranjan Seehra in April 2026 to undertake a Preliminary Ecological Appraisal of Land at Bocoda Hill Farm, Wrotham Road, South Street, Meopham, DA13 0QG, central grid reference TQ 63654 64309 (herein referred to as 'the site').

The Site

- 1.2 The site extends to approximately 0.273 hectares and comprises modified grassland, which is cut on an annual basis, a stable and connecting hay storage, an area of developed land, sealed surface surrounding the stable, part of an old existing horse school and access road to the site, and artificial unvegetated, unsealed surface, comprising an existing track through the site. Linear features along the site boundaries comprise of two species-rich native hedgerows with trees along the southern and eastern boundary and a non-native and ornamental hedgerow along the western boundary. One individual tree is present within the site.
- 1.3 The site is located approximately 7.5km northwest of West Malling. Land use within the surrounding area comprises farmland, grassland and woodland. To the east, the site is separated from grassland and woodland by A227 (South Street). To the south and west of the site are areas of grassland, arable fields and scattered woodland, to the north are scattered residential dwellings and two ponds interspersed with woodland and grassland.

Proposals

- 1.4 The proposed development is for the conversion of the existing stables into a residential dwelling with associated landscaped areas. The access to the north is proposed to be resurfaced with tarmac, and the field to the east is proposed to be planted as a wildflower meadow. All hedgerows and individual trees are to be retained.

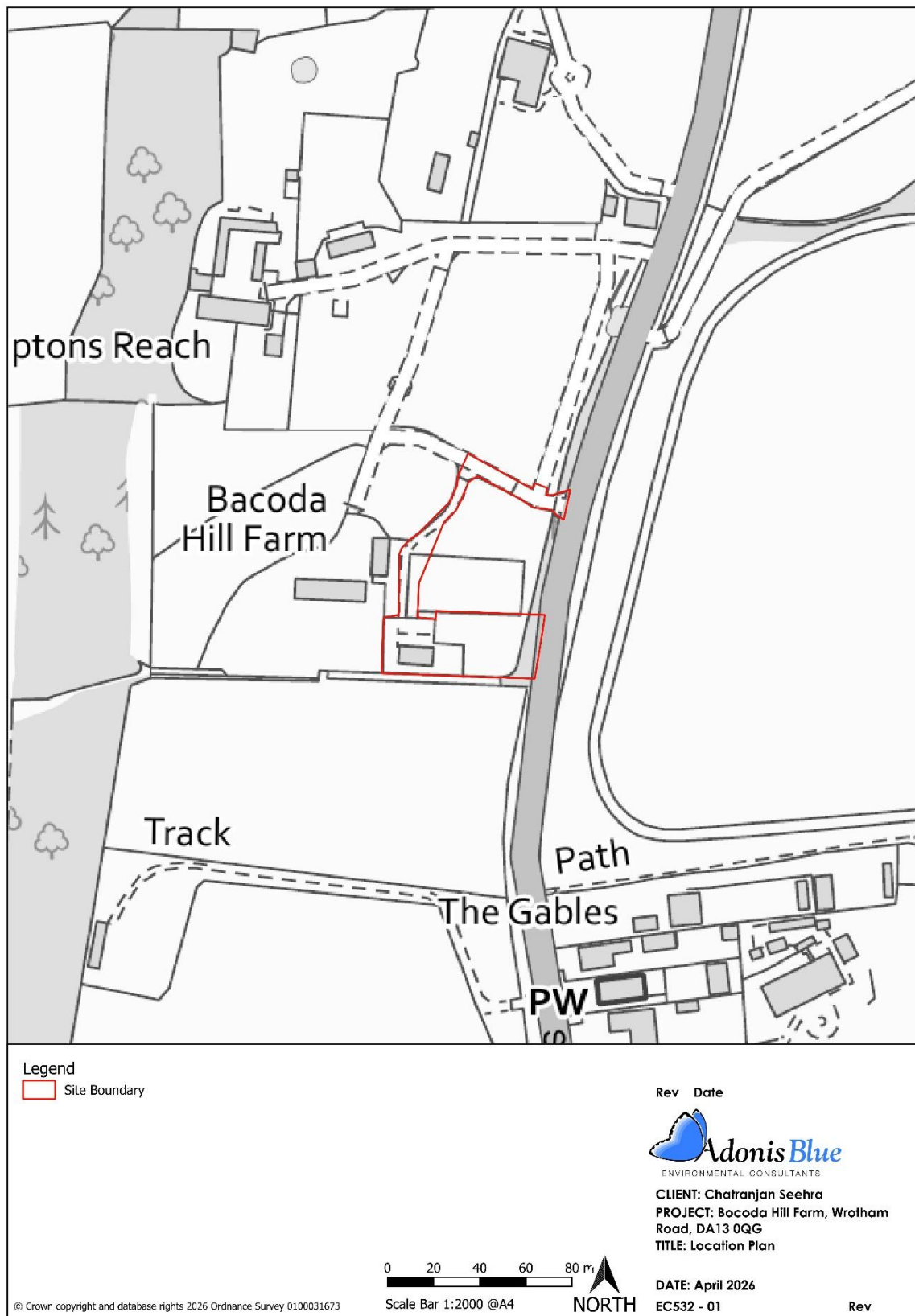
Survey Objectives

- 1.5 The purpose of this survey is to provide a Preliminary Ecological Appraisal (PEA) to identify relevant ecological constraints and opportunities.
- 1.6 The key objectives are as follows:
- Identify all relevant statutory and non-statutory designated sites and features of ecological significance within the site and the zone of influence;
 - Assess the potential for the presence of protected species and Species and Habitats of Principal Importance or other biodiversity features within the site and its surroundings;
 - Detail further surveys that are likely to be required, based on the likely development proposals;
 - Present the likely significance of ecological impacts on the proposed works; and

- Provide an early indication of potential ecological mitigation and compensation requirements necessary as part of any development proposals

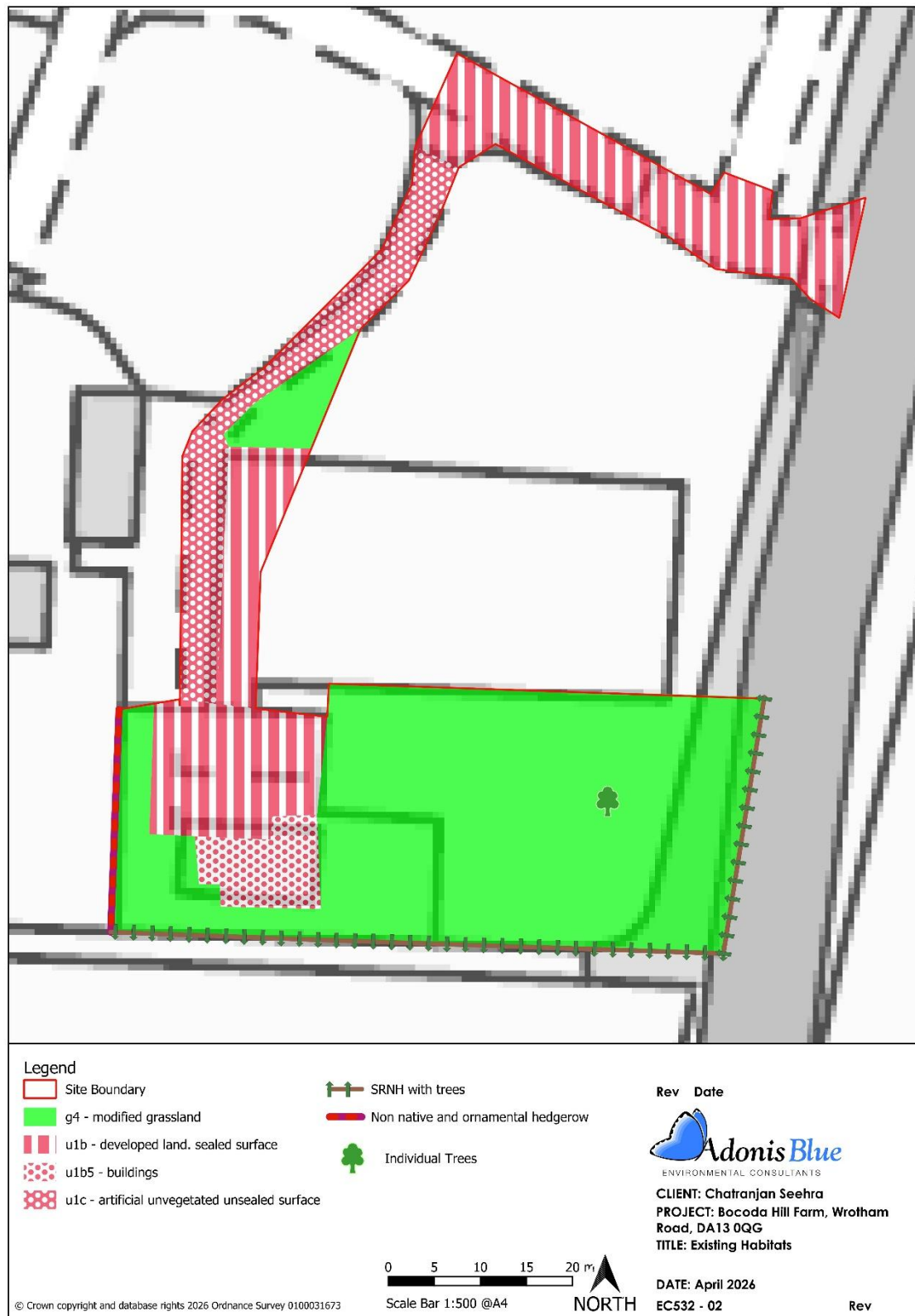
2. SITE LOCATION PLAN

Figure 1: Site Location Map.



3. EXISTING HABITATS PLAN

Figure 2: Existing Site Plan



4. METHODOLOGY

Desktop Study

- 4.1 An ecological desktop study was carried out prior to the site visit. Collation of such information can identify the presence of any statutory or non-statutory designated ecological sites and highlight presence of protected or notable species occurring on the site or within the local area and which may have the potential to be affected by the proposals.
- 4.2 The consultees for the desktop study and with information provided are shown in Table 1.

Table 1. Desktop Study Consultees.

Consultee	Data Obtained
Kent & Medway Biological Records Centre (KMBRC) ¹	• Statutory designated sites – 1km radius from site centre • Non-statutory designated sites – 1km radius from site centre • Section 41 habitats – 1km radius from site centre • Protected and designated species records - 1km radius from site centre • Bat records - 5km radius from site centre • Bird records - 1km radius from site centre
Kent Landscape Information System (KLIS) ²	Local Wildlife Sites -1km radius from site centre
Magic Website ³	Data analysed within 15 km radius from site centre: • Statutory Sites of International Importance – including Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites. Data analysed within 2 km radius from site centre: • Statutory Sites of National Importance - including National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR). Data analysed within 1 km radius from site centre: • Granted European Protected Species Licencing (bats 5km) Data analysed within 500 m radius from site centre: • Priority Habitats • Ancient woodland

¹ <https://www.kmbrc.org.uk>

² <http://www.archnature.eu/mapping-tools.html>

³ www.magic.gov.uk

	Impact Risk Zones (to assess planning applications for likely impacts on SSSIs, SAC, SPA and RAMSAR within area of interest).
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Site Survey

4.3 The site survey was undertaken on 15th April 2026 by Jess Martin-Joiner BSc (Hons) a Qualifying member of CIEEM and Ecologist at ABEC with four years’ experience conducting protected species and UKHab surveys across a range of habitat types. Jess holds a Level 4 Plant Identification Test (PIT) qualification, equivalent to a Level 4 Field Identification Skills Certificate (FISC).

Table 2. Survey weather conditions.

Survey visit date	Surveyor	Weather conditions
15 th April 2026	Jess Martin-Joiner	12°C, slight breeze, 90% cloud cover, ground wet.

- 4.4 During the survey, an inspection of the site and immediate wider area was undertaken as follows:
- Ground level inspection of all trees within the site for roosting bat potential.
 - An external and internal inspection of the structures looking for evidence of potential bat roosting and bird nesting features and evidence of occupancy. Inspection was carried out from ground level.
 - Badger signs and sett search within the site and including a 30m radius surround the site, where accessible.
 - A walkover survey to map the habitats present within the survey area and to assess their importance and likelihood of supporting protected species using standard best practice survey methods (Bat Conservation Trust, 2023; UKHab Ltd, 2024; CIEEM, 2018).
- 4.5 Mapping of the habitats within the site followed the UK Habitat (UKHab) Classification methodology V2 (UKHab Ltd, 2024). This follows a standardised system which can be easily interpreted. Target notes were used to record further information regarding features of interest, specific habitats or features identified during the survey which do not closely match any of the UKHab Classification criteria. Plant species were identified in accordance with Streeter et al (2016).
- 4.6 A search was also conducted for the presence of Schedule 9 invasive non-native plant species (INNS); however, it should be noted that this is not a specific survey for these species.

Ground Level Tree Assessment (GLTA)

- 4.7 All suitable trees within the site were subject to a ground level tree assessment to assess their suitability for roosting bats and any subsequent impact they may experience from the proposed works.
- 4.8 All potential features identified were checked for evidence of bats and photographed. Where necessary binoculars were used to inspect features.

Preliminary Roost Assessment (PRA)

- 4.9 The structures were subject to an external and internal assessment. The survey was carried out in accordance with best practice guidelines (Collins, 2023).
- 4.10 The inspection included a systematic search of each structure from ground level to:
 - Assess the structure in terms of wall and roof construction.
 - Identify potential access points and roosting features such as holes or gaps in the roof, walls, or brickwork; and
 - Search for evidence of bats such as live or dead specimens, squeaking noises, urine splashes, staining and/or bat droppings below any features, on walls, windows, and floors.
- 4.11 During the Preliminary Roost Assessment, binoculars were used as required. Any signs of breeding birds were also noted.

Suitability Assessment

- 4.12 The overall suitability for a structure to support roosting bats at any time of year was classified by placing the structures into one of five categories as described in Collins (2023):

High: A structure with one or more potential roost sites that are obviously suitable for use by a larger number 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 status roosts, e.g. maternity or classic cool/stable hibernation site.

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, such as a maternity or hibernation roost.

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 (unlikely to be used as a maternity roost and not a classic cool/stable hibernation site but could be used by individual hibernating 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.

None: No habitat features on site likely to be used by any roosting bats at any time of year (a complete absence of crevices/suitable shelter at all ground/underground levels).

- 4.13 The overall suitability for a tree to support roosting bats at any time of year is classified by placing the tree into three categories as described in Collins (2023):

PRF: A tree with at least one PRF (Potential Roost Feature) present.

FAR: Further assessment required to establish if PRFs are present in the tree.

None: Either no PRFs in the tree or unlikely to be any.

Limitations

- 4.14 Due to the nature of this type of report, it is possible that some plant species were not recorded during the visit as different plant species appear within different months of the year. This is not considered to be a significant limitation as the habitat types within the site could be determined from the plant species present.
- 4.15 The two off-site ponds within 250m of the site are located on private land and therefore could not be assessed for great crested newts *Triturus cristatus*. Due to the limited and sub-optimal terrestrial habitat on site, precautionary mitigation will be implemented to reduce the potential for individual great crested newts being harmed during the development.

5. BASELINE ECOLOGICAL CONDITIONS

Designated Sites

5.1 A map of the designations is provided within Appendix C.

Statutory Sites of International Importance

5.2 The Statutory Sites of International Importance located within 15km of the site are listed in Table 3 below.

Table 3. Statutory sites of international importance within 15km of development site.

Designation	Site Name	Distance from site (closest point)	Site description
Special area of conservation (SAC) ⁴	North Downs Woodlands	3.5km east	Chalk escarpment of south-east England. It has been designated to conserve rare chalk woodland habitats and the wildlife that depends on them.
	Peters Pit	8.0km east	Peter's Pit is an old chalk quarry located in the North Downs in north Kent, near Faversham. The site comprises large ponds set within a mosaic of grassland, scrub, and woodland habitats. Water levels in the ponds fluctuate considerably, yet they support significant breeding populations of the great crested newt. As a former chalk quarry, the site has undergone natural regeneration, developing into valuable chalk grassland and scrub. The thin, alkaline chalk soils and sun-exposed quarry slopes provide ideal conditions for species-rich calcareous grassland communities.
Ramsar ⁵ & Special protected area (SPA) ⁶	Thames Estuary & Marshes	9.7km northeast	A complex of brackish, floodplain grazing marsh ditches, saline lagoons and intertidal saltmarsh and mudflat. These habitats together support internationally important numbers of wintering waterfowl. The saltmarsh and grazing marsh are of international importance for their diverse assemblages of wetland plants and invertebrates.

⁴ A protected area designated under the EU Habitats Directive to safeguard important natural habitats and species of plants and animals, ensuring their long-term conservation.

⁵ A wetland area designated under the Ramsar Convention to protect wetlands of international importance, especially as habitats for water birds.

⁶ A legally protected site designated under the EU Birds Directive to conserve important habitats for rare, threatened, and migratory bird species.

5.3 Proposed works to the site are unlikely to impact the above SPA, SAC and Ramsar sites due to the small scale of site, nature of the development and distance between the sites.

5.4 No further assessment or mitigation is required for statutory sites of international importance.

Statutory sites of National Importance

5.5 There are no statutory sites of national importance located within 2km of the development site.

5.6 No further assessment or mitigation is required for statutory sites of national importance.

5.7 The site lies within a Natural England Impact Risk Zone (IRZ) for nearby Sites of Special Scientific Interest (SSSI). The SSSI in question is Halling to Trottiscliffe Escarpment located 3.5km east of the site. However, the proposals do not meet the criteria of any of the planning categories listed against this IRZ.

Non-statutory sites

5.8 There are two Local Wildlife Sites (LWS) within 1km of the site.

Table 4. Non-statutory sites within 1km of development site.

Site type	Site Name	Distance from site (closest point)	Site description
Local Wildlife Sites (LWS) ⁷	Happy Valley, Meopham	260m east	Happy Valley is valued for its chalk grassland habitats, which support a diverse assemblage of wildflowers and grasses, alongside notable invertebrate and bird species.
	Elbows Wood, Meopham	700m northwest	Elbows Wood is recognised for its ancient or semi-natural woodland characteristics, providing habitats for notable birds, invertebrates, and small mammals.

5.9 The proposed development is unlikely to impact the above LWSs due to the distance from the site, the small scale of the site and nature of the development.

5.10 No further assessment or mitigation is required for non-statutory sites.

Ancient woodland

5.11 There are three areas of ancient woodland located within 500m of the site. The closest lies c. 250m east of the site.

⁷ A locally designated area identified for its importance to wildlife and habitats at a county or district level, protected through local planning policy rather than national law.

- 5.12 The proposed development is unlikely to impact the above ancient woodland, due to the small nature and size of the proposed development and the distance between the site and woodland. As such, no further assessment or mitigation is considered necessary in relation to ancient woodland.

Priority habitats

- 5.13 According to Natural England's Magic Map application, three types of priority habitat are present within 500m of the site: six parcels of deciduous woodland, one area of lowland calcareous grassland and one area of traditional orchard the nearest being c.200m east.
- 5.14 The proposed development is unlikely to impact the above priority habitats, due to the inaccessibility of the priority habitats from the surrounding public rights of ways, and the small scale and nature of the development. As such, no further assessment or mitigation is considered necessary in relation to priority habitats.

Habitats

- 5.15 The habitats present within the site are described in Table 5 below according to the UK Habitat Classification system.
- 5.16 A habitat plan showing the location and extent of habitats within the site is provided in Figure 2, Section 3. Photographs of the site are provided within Appendix B.

Table 5. UKHab Classification Habitat Survey (S41 refers to species or habitats listed on Section 41 of the NERC Act 2006 (as amended)).

UKHab Classification Habitat (code)	Secondary codes	S41 Habitat	Description
Modified grassland (g4)	n/a	No	Three areas of modified grassland, the largest of the three areas is an old horse paddock. Species include common nettle <i>Urtica dioica</i>, cleavers <i>Galium aparine</i>, lesser celandine <i>Ficaria verna</i>, cow parsley <i>Anthriscus sylvestris</i>, perennial rye-grass <i>Lolium perenne</i>, hogweed <i>Heracleum sphondylium</i>, meadow buttercup <i>Ranunculus acris</i>, broad-leaved dock <i>Rumex obtusifolius</i>, creeping buttercup <i>Ranunculus repens</i>, Yorkshire-fog <i>Holcus lanatus</i>, lords-and-ladies <i>Arum maculatum</i>, bramble <i>Rubus fruticosus</i> agg., and greater plantain <i>Plantago major</i>. The second area is a grassland border around the western boundary of the site and surrounding two sides of the existing stable block. Species include ground-ivy <i>Glechoma hederacea</i>, dandelions <i>Taraxacum</i> spp., hogweed <i>Heracleum sphondylium</i>, cleavers <i>Galium aparine</i>, perennial rye-grass <i>Lolium perenne</i>, white clover <i>Trifolium repens</i>, white dead-nettle <i>Lamium album</i>, and common nettle <i>Urtica dioica</i>. The last area is a small section on the existing grassland to the north of the site that will be incorporated into a driveway for the development. Species include perennial rye-grass <i>Lolium perenne</i>, dandelions <i>Taraxacum</i> spp., and cut-leaved crane's-bill <i>Geranium dissectum</i>.
Artificial unvegetated, unsealed surface (u1c)	n/a	No	An existing track leading from the road to the existing stable building and connecting hay storage. Species include perennial rye-grass <i>Lolium perenne</i> , common vetch <i>Vicia sativa</i> , greater plantain <i>Plantago major</i> , white clover <i>Trifolium repens</i> , and ribwort plantain <i>Plantago lanceolata</i> .
Buildings (u1b5)	n/a	No	A stable block with adjoining hay storage; the building comprises timber sides, with a gable felt roof over the stable section and a flat felt roof over the hay storage.
Developed land, sealed surface (u1b)	n/a	No	There are three areas of hardstanding: the first comprises the access road into the site, which is currently tarmac; the second is an existing horse school, which is fenced off from the rest of the

UKHab Classification Habitat (code)	Secondary codes	S41 Habitat	Description
			site; and the third is the hardstanding surrounding the existing stable block. This area contains perennial rye-grass <i>Lolium perenne</i> , cut-leaved crane's-bill <i>Geranium dissectum</i> , dandelions <i>Taraxacum spp.</i> , ground-ivy <i>Glechoma hederacea</i> , white dead-nettle <i>Lamium album</i> , hogweed <i>Heracleum sphondylium</i> , chickweed <i>Stellaria media</i> , hairy bittercress <i>Cardamine hirsuta</i> , Yorkshire-fog <i>Holcus lanatus</i> , and cleavers <i>Galium aparine</i> .
Individual mature tree (203)	Mature tree (203)	No	There is one mature hornbeam <i>Carpinus betulus</i> within the large area of modified grassland on site.
Non-native and ornamental hedgerow (h2b)	n/a	No	One hedgerow along the south aspect of the western boundary separating the site from a private garden. Species include herry laurel <i>Prunus laurocerasus</i> , hawthorn <i>Crataegus monogyna</i> , and blackthorn <i>Prunus spinosa</i> .
Species-rich native hedgerows with trees (h2a5 11)	Hedgerow with trees (11)	No	Two hedgerows with trees along the southern and eastern boundary of the site. Species in the southern hedgerow includes hazel <i>Corylus avellana</i> , elder <i>Sambucus nigra</i> , sycamore <i>Acer pseudoplatanus</i> , hawthorn <i>Crataegus monogyna</i> , cherry laurel <i>Prunus laurocerasus</i> , and field maple <i>Acer campestre</i> . Species in the eastern boundary include Sycamore <i>Acer pseudoplatanus</i> , ash <i>Fraxinus excelsior</i> , hawthorn <i>Crataegus monogyna</i> , elder <i>Sambucus nigra</i> , and field maple <i>Acer campestre</i> .

Species and species groups

- 5.17 The potential for the site to support protected and notable species is described below.

Flora

- 5.18 Data obtained from KMBRC within 1km of the site included seven species that are nationally scarce and rare in England; Scots pine *Pinus sylvestris*, the lichen *Polycauliona ucrainica*, man orchid *Orchis anthropophora*, lady orchid *Orchis purpurea*, wall bedstraw *Galium parisiense*, stinking hellebore *Helleborus foetidus* and Welsh poppy *Papaver cambricum* and two species listed in Schedule 8 of the Wildlife and Countryside Act, 1981, bluebell *Hyacinthoides non-scripta* and oak polypore *Buglossoporus quercinus*.
- 5.19 At the time of the survey, Scots pine would have been expected to be visible; however, the species was not recorded. This absence suggests that the site is unlikely to support this species.
- 5.20 *Polycauliona ucrainica* is a lichen that can grow on man-made substrates such as the stables and adjacent hay storage. However, the combination of high disturbance, unsuitable surfaces due to the treated wood, and poor light/ventilation in the stables, the site is unlikely to support it.
- 5.21 Man and Lady orchid inhabits chalk pits, open woodland and calcareous grassland, none of these habitats are found on site, therefore the site is unlikely to support this species.
- 5.22 Wall bedstraw is typically associated with old walls, bare ground, and calcareous and neutral grassland. While grassland is present on site in the form of modified grassland. As the species was not recorded during the site survey, the site is considered unlikely to support it.
- 5.23 Stinking Hellebore inhabits woodland glades, open scrub and rock ledges, none of these habitats are found on site, therefore the site is unlikely to support this species.
- 5.24 Welsh poppy is found in damp woodlands and cliff ledges these habitat types are not present on site, and the species was not recorded during the survey, therefore the site is unlikely to support this species.
- 5.25 Bluebells occur in deciduous woodland habitats, as well as in hedgerows, shaded banks, and unimproved grassland. At the time of the survey, bluebells would have been expected to be in flower; however, the species was not recorded. This absence suggests that the site is unlikely to support this species.
- 5.26 Oak polypore is found on limbs on living or dead veteran oak trees. Although trees are present on site, no oak species were present within the site, and the site is unlikely to support this species.
- 5.27 No further survey work, mitigation or assessment is required for flora.

Invertebrates

- 5.28 Data obtained from KMBRC within 1km of the site included three species that are nationally scarce and rare in England; The ground beetle *Demetrias monostigma*, the flea beetle *Mantura rustica* and the leaf beetle *Cryptocephalus hypochaeridis* and two species listed in Schedule 5 of the Wildlife and Countryside Act, Roman Snail *Helix pomatia* and White-letter Hairstreak *Satyrrium w-album*.
- 5.29 *Demetrias monostigma* is found on coastal and grassy slopes, as well as sand or silt near freshwater flushes; none of these habitats are found on site, therefore the site is unlikely to support this species.
- 5.30 *Mantura rustica* is typically associated with calcareous and neutral grassland, as well as open, disturbed ground. While modified grassland is present on site, no host plants, sorrel *Rumex* spp., were recorded during the survey. In the absence of suitable host plants, it is considered unlikely that the site supports this species.
- 5.31 *Cryptocephalus hypochaeridis* is typically found in limestone and dune areas, along with woodlands; none of these habitats are found on site, therefore the site is unlikely to support this species.
- 5.32 Roman Snail is found on calcareous soil, this habitat is not found on site, therefore the site is unlikely to support this species.
- 5.33 The white-letter hairstreak typically inhabits woodlands, hedgerows, parks, and gardens. While grassland is present on site, elm trees *Ulmus* spp., which are the species primary host plants, were not recorded during the survey. In the absence of suitable host trees, the site is considered unlikely to support this species.
- 5.34 No further survey work, mitigation or assessment is required for invertebrates.

Great Crested Newt / Amphibians

- 5.35 Data obtained from KMBRC included no records of great crested newt *Triturus cristatus* within 1km of the site.
- 5.36 According to data obtained from MAGIC Map⁸, no EPSM⁹ licences have been granted by Natural England for great crested newt within 1km of the site.
- 5.37 There are no ponds present within or immediately adjacent to the site. Based on Ordnance Survey mapping and aerial imagery, there are two ponds within 250 m of the site boundary; the nearest pond being approximately 85m north of the site. The two ponds are located on private land and were not accessed as part of this survey.
- 5.38 The site is separated from the surrounding ponds by a combination of grassland and small access roads, which together create a partial barrier for great crested newt dispersal. Although areas of modified grassland are present within the southern aspect of the site, they provide sub-optimal suitability for amphibian foraging and shelter. Boundary vegetation is expected to be retained as part of the proposals.

⁸ MAGIC

⁹ European Protected Species Mitigation

- 5.39 Based on the limited on-site terrestrial suitability, it is assessed that the risk of great crested newts occurring on the site is low. As such, further presence/absence or eDNA surveys are not considered necessary or proportionate to the level of risk.
- 5.40 However, due to the close proximity of the surrounding off-site ponds and the lack of dispersal barriers from the site, mitigation will be implemented and is set out in Section 9.
- 5.41 The mitigation outlined in Section 9 will also apply to other amphibian species recorded in the local area, including common toad *Bufo bufo*, a S41 priority species, for which one record is held by KMBRC.

Reptiles

- 5.42 Data obtained from KMBRC included no records of reptiles within 1km of the site.
- 5.43 The site includes areas of modified grassland within the southern aspect of the site, however due to the small areas of grassland and the current habitat mosaic, this grassland is sub-optimal for reptiles. The majority of the site comprises developed land, sealed surface and artificial unvegetated, unsealed surface resulting in areas of bare ground and hard standing which significantly reduces suitability for reptiles. The hedgerows are to be retained and remain unaffected by the proposals. On this basis, the site is currently considered to be of low suitability for reptiles, and further survey is not considered necessary or proportionate.
- 5.44 The site is connected to surrounding habitats that may be suitable for reptiles. As such, a precautionary mitigation approach will be implemented to reduce the risk of harm to any individual that may be occasionally using or commuting through the site. The mitigation measures to be applied are set out in Section 9.

Birds

- 5.45 Data obtained from KMBRC included records of 80 bird species within 1km of the site. The data includes six records of species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), including hobby *Falco subbuteo*, fieldfare *Turdus pilaris*, redwing *Turdus iliacus*, brambling *Fringilla montifringilla*, common crossbill *Loxia curvirostra* and barn owl *tyto alba*.
- 5.46 Hobby prefers large woodland blocks of mature dense deciduous or mixed woodland with clearings, none of which occur on site, and as such, hobby is not expected to nest within the site.
- 5.47 Fieldfare, redwing and brambling are winter visitors, that are not expected to nest in this country, therefore they are unlikely to be impacted by the development.
- 5.48 Common crossbill typically inhabits coniferous woodland, relying on mature pine and spruce, and are associated with larch. As this habitat is not present on site, the species is not expected to nest within the site.
- 5.49 Barn owl typically inhabit open farmland, grassland and areas of woodland. These habitats are present near the site. However, given the limited extent of suitable nesting features on site, it is considered unlikely that barn owl would nest within the site.

- 5.50 Several common bird species were observed during the site survey: blackbird *Turdus merula*, common chaffinch *Fringilla coelebs*, wood pigeon *Columba palumbus*, blue tit *Cyanistes caeruleus*, goldfinch *Carduelis carduelis*, robin *Erithacus rubecula*, great tit *Parus major*, and wren *Troglodytes troglodytes*.
- 5.51 Habitats within the site including the species-rich native hedgerow with trees, building, non-native hedgerow and the individual tree provide suitable habitat for nesting birds, mitigation for common nesting birds is considered further in Section 7.

Hedgehog

- 5.52 Data obtained from KMBRC included five records of European hedgehog *Erinaceus europaeus* within 1km of the site.
- 5.53 The species-rich native hedgerow with trees and non-native hedgerow on the site provide suitable foraging habitat.
- 5.54 Hedgehogs are considered further in Section 7.

Badger

- 5.55 Data from KMBRC included 12 records of European badger *Meles meles* within 1km of the site.
- 5.56 No badger setts or signs of badger were found within the site or within a 30m radius of the site boundary. Due to the current habitats on site, proposals are unlikely to affect the local population. However, the occasional presence of badger within the site cannot be entirely ruled out.
- 5.57 Badgers are considered further in Section 7.

Riparian mammals

- 5.58 Data from KMBRC includes no record for water vole *Arvicola amphibius* and otter *Lutra lutra* within 1km of the site.
- 5.59 The habitats within and adjacent to the site provide no suitable habitat for riparian mammals.
- 5.60 No further survey, mitigation or assessment is required for riparian mammals.

Hazel Dormouse

- 5.61 Data obtained from KMBRC include no recent records of hazel dormouse *Muscardinus avellanarius* within 1km of the site.
- 5.62 According to data obtained from MAGIC, no EPSM licences have been granted by Natural England for hazel dormouse within 3km of the site.
- 5.63 The species-rich native hedgerow with trees within the site provides sub-optimal habitat for hazel dormouse, this is not being affected by the proposed works. Therefore, no further survey, mitigation or assessment is required for hazel dormouse.

Bats

- 5.64 A summary of the bat records within 5km of the site provided by KMBRC is included within Table 6 below.
- 5.65 The data search highlighted the presence of one hibernation bat roost within 1km of the site, located 950m south of the site.

Table 6. Bat records compiled from desktop study.

Species	Distance from site	Status
Danbenton's Bat <i>Myotis daubentonii</i>	3.36km southeast	ECH4, WCA5, LPS
Serotine <i>Eptesicus serotinus</i>	1.98km south	ECH4, WCA5, LPS,
Noctule <i>Nyctalus noctula</i>	3.04km north	ECH4, WCA5, LPS
Brown Long-eared Bat <i>Plecotus auritus</i>	0.98km south	ECH4, WCA5, LPS
Whiskered Bat <i>Myotis mystacinus</i>	3.36km southeast	ECH4, WCA5
Natterer's Bat <i>Myotis nattereri</i>	3.36km southeast	ECH4, WCA5
Leisler's Bat <i>Nyctalus leisleri</i>	3.04km north	ECH4, WCA5
Common pipistrelle <i>Pipistrellus pipistrellus</i>	0.33km southeast	ECH4, WCA5
Soprano Pipistrelle <i>Pipistrellus pygmaeus</i>	1.38km south	ECH4, WCA5, LPS
Key: ECH 4: Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest in need of strict protection. WCA 5: Schedule 5 of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). LPS: Local Priority Species		

- 5.66 There are three records of EPS licences within 5km of the site, the nearest of which is 3.25km west of the site.

Roosting bats – structures

Table 7. Building suitability for roosting bats

Buildings	Description	Suitability for roosting bats
Existing stable and connected hay storage	Timber-sided stable block and hay storage with a felt roof. The top of the stable doors are always left open and there are gaps above the hay storage access door on the eastern aspect of the connected hay storage, as well as gaps within the upper timber cladding along the southern elevation of the connecting hay storage.	Low

- 5.67 Roosting bats are considered further in Section 8.

Roosting bats - trees

- 5.68 All trees within the site were subject to a Ground Level Tree Assessment (GLTA). No potential roost features (PRF) were visible within any of the trees assessed.
- 5.69 No further survey work or mitigation is required for roosting bats in trees.

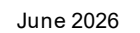
Bat foraging habitat

- 5.70 Habitats within the site have low suitability for commuting and foraging bats due to the lack of suitable vegetated habitat and human disturbance within the site. Better foraging and commuting habitat can be found within the surrounding landscape, especially the surrounding woodlands, grassland and arable fields.
- 5.71 In the absence of appropriate mitigation, the proposed works have the potential to affect commuting and foraging bats that may utilise on-site boundary features, particularly the species-rich native hedgerows with mature trees, which provide suitable linear commuting corridors. However, as these boundary features are to be fully retained and will remain unaffected by the proposals, no significant impacts to foraging or commuting bats are anticipated. On this basis, further survey effort for commuting and foraging bats is not considered necessary.
- 5.72 The site boundaries will need mitigation due to the additional lighting levels during the construction phase and post-development.
- 5.73 Foraging and commuting bats are considered further in Section 7.

Invasive Species

- 5.74 The KMBRC data search includes eleven Schedule 9 invasive plant species including, Montbretia *Crocsmia × crocosmiiflora*, Japanese Knotweed *Reynoutria japonica*, Rhododendron *Rhododendron ponticum*, Hermann's Pride *Lamium galeobdolon* subsp. *argentatum*, Himalayan Cotoneaster *Cotoneaster simonsii*, Giant Hogweed *Heracleum mantegazzianum* and winter heliotrope *Petasites pyrenaicus*.
- 5.75 None of these species were found during the site visit, and they are considered unlikely to be present on site.
- 5.76 The walkover survey found Cherry Laurel *Prunus laurocerasus* another Schedule 9 invasive species, on the western and south edge of the site, that had escaped from the neighbouring garden. Cherry laurel is an invasive non-native ornamental species often found in vegetated gardens.
- 5.77 Further mitigation is needed to manage this invasive species is detailed in Section 9.

Figure 3: Proposed Site Layout (Drawing No. 86341R1, EnviroSmart)



7. KEY ECOLOGICAL CONSTRAINTS FOR DESIGN

Proposals

- 7.1 The proposed development is for the conversion of the existing stables into a residential dwelling with associated landscaped areas. The access to the north is proposed to be resurfaced with tarmac, and the field to the east is proposed to be planted as a wildflower meadow. All hedgerows and individual trees are to be retained.

Key ecological constraints

- 7.2 The potential ecological constraints to the development proposals are considered in the following section.
- 7.3 Should the proposed works be deferred for a period in excess of 18 months, or should the proposals be subject to change, then contents of this report and its recommendations will need to be updated.

Species and species groups

Trees and Site Boundaries

- 7.4 The site contains an individual tree and hedgerows that are to be retained. Further mitigation is outlined in Section 9, to avoid dust and damage to the retained features.

Great Crested Newt / Amphibians

- 7.5 The site contains areas of modified grassland within the southern aspect of the site, there are two off-site ponds within a 250m radius, the nearest pond being approximately 85m north of the site.
- 7.6 The site is separated from the surrounding ponds by a combination of grassland and small access roads, which together create a partial barrier for great crested newt dispersal. Although areas of modified grassland are present within the southern aspect of the site, they provide sub-optimal suitability for amphibian foraging and shelter.
- 7.7 Based on the limited on-site terrestrial suitability, it is assessed that the risk of great crested newts occurring on the site is low. As such, further presence/absence or eDNA surveys are not considered necessary or proportionate to the level of risk.
- 7.8 However, due to the close proximity of the surrounding off-site ponds and the lack of dispersal barriers from the site, a precautionary approach will be adopted, as lack of suitable mitigation could result in accidental harm to individual animals.
- 7.9 Suitable mitigation measures are detailed within Section 9.

Reptiles

- 7.10 The site contains areas of modified grassland within the southern aspect of the site, due to the small areas of grassland and the current habitat mosaic, this grassland is sub-optimal for reptiles. The majority of the site comprises develop land sealed surface

and artificial unvegetated, unsealed surface resulting in areas of bare ground and hard standing which significantly reduces suitability for reptiles. The absence of a suitable terrestrial habitat on site means the likelihood of supporting a reptile population on site is low.

7.11 However, due to the connectivity to suitable reptile habitat, a precautionary approach will be adopted, as lack of suitable mitigation could result in accidental harm to individual animals.

7.12 Suitable mitigation measures are detailed within Section 9.

Birds

7.13 Habitats within the site including species-rich native hedgerow with trees, non-native / ornamental hedgerow, individual tree and the existing building provide suitable habitat for nesting birds.

7.14 Proposals are unlikely to impact local bird populations due to relatively small amount of suitable habitat being impacted. The hedgerows are to be retained and unaffected, and there are large amounts of additional suitable habitat in the surrounding landscape. No further survey work is recommended for birds.

7.15 Mitigation measures are detailed within Section 9 to avoid impacts to common nesting birds found on site.

Hedgehog

7.16 The occasional presence of hedgehog within the site cannot be ruled out. Proposals are unlikely to affect the local populations of this species and therefore no further survey work is recommended for hedgehog. However, the absence of suitable mitigation could result in accidental harm to individual animals.

7.17 The mitigation outlined in Section 9 will also be applied to help protect other mammal species that may be present on site.

7.18 Suitable mitigation measures are detailed within Section 9.

Badger

7.19 No badger setts or signs of badger were found within the site or within a 30m radius of the site, therefore they are unlikely to be present. However, the occasional presence of foraging or commuting individuals within the site cannot be ruled out therefore a precautionary approach is recommended.

7.20 Badgers are considered further in Section 9.

Bats

Roosting bats – Buildings

7.21 The existing stable and connected hay storage were found to have low suitability for roosting bats. Therefore, additional emergence surveys are required for the site.

7.22 Roosting bats in buildings are considered further in Section 8.

Foraging and Commuting bats

7.23 The site boundaries comprising species-rich native hedgerows provide low suitability for foraging and commuting bats. As the site boundaries are to be retained in the proposed works, no further survey works for foraging and commuting bats are required.

7.24 Due to the indirect effects of additional lighting on site, further mitigation for foraging and commuting bats along site boundaries is outlined in Section 9.

8. FURTHER ECOLOGICAL ASSESSMENT

- 8.1 The following ecological surveys are recommended based on potential impacts of the proposed development.

Roosting bats – Structures

Summer Roosting Bats

- 8.2 The potential features (Appendix E) associated with the existing stable block and connecting hay storage provides low suitability for summer roosting bats.
- 8.3 The following survey effort is required to determine the presence or likely absence of summer roosting bats:
- One dusk emergence survey to be undertaken within the survey period May to August.
 - Survey conditions should be 10°C or above at sunset, with no heavy rain or strong wind.
 - Should a roosting bat/s be found within the building, two additional emergence surveys will be required to characterise the roost and provide sufficient data on which to base an application to Natural England for a European Protected Species Mitigation (EPSM) licence. Emergence surveys would need to be spaced at least 3 weeks apart.

9. MITIGATION REQUIREMENTS

- 9.1 The following mitigation measures may be required depending on the precise nature and extent of proposed works.

Individual trees and hedgerows

- 9.2 All individual trees and hedgerows that are predicted to be retained should follow guidance given in the 'BS 5837:2012 Trees in relation to design, demolition and construction'. This standard requires a Tree Protection Plan to be put in place wherever there is potential for works to impact on trees, for example, through dust pollution and/or machinery incursion. For trees within and immediately adjacent to the works area, this plan should include the delineation of the tree root protection area with protective fencing.
- 9.3 The retained hedgerows and individual tree should be protected against accidental damage during works, including their root plates, using appropriate fencing such as Heras fencing or similar, as required.

Species and species groups

Amphibians and Reptiles

- 9.4 To minimise the risk of any individual amphibians and reptiles being killed or injured, any required vegetation clearance will be carried out under the following precautionary methodology.
- Vegetation clearance will be kept to the minimum required to facilitate the works. Clearance works will commence outside of the amphibian and reptile hibernation season (generally regarded as November to February). Works will take place in suitable weather conditions (i.e. weather above 10°C, dry and calm weather).
 - A search for amphibians and reptiles should occur before cutting, and any individuals found should be relocated outside of the works area, unless a Great crested newt is found then all works will need to stop, and a mitigation license obtained.
 - All current log piles within the site that are to be affected by the development should be removed and dismantled by hand, before strimming occurs.
 - An initial cut will be undertaken with a handheld strimmer to a height of 150mm and the arisings raked off. The arisings will be used to make soft release piles / hibernacula in the site boundaries of the site. The area will then be left for 24 hours to enable individuals to disperse the area.
 - A second cut will then be taken to ground level and the arisings removed as before. The area will then be left for 24 hours to enable individuals to disperse the area.
- 9.5 During the construction phase, all building material, debris and rubble will be stored on pallets away from site boundaries to reduce the risks of amphibians and reptiles seeking shelter beneath them. This should minimise the risks to individual amphibians and reptiles within the site.

Birds

9.6 Habitats within the site including species-rich native hedgerow with trees, non-native / ornamental hedgerow, individual tree and the existing building provide suitable habitat for nesting birds.

- Any works that include impacts to the above habitats should be undertaken outside of the main bird breeding season (avoiding the 1st March – 31st August inclusive).
- If this is not possible then an inspection by a suitably experienced ecologist should be completed a maximum of 48 hours before works commence. If during the inspection a nest considered to be in use is discovered, works must not commence until the chicks have fledged.

Hedgehog and other mammals

9.7 The occasional presence of hedgehog and other mammals within the site cannot be ruled out. Mitigation is detailed below to minimise the risks to individual animals:

- Care should be taken when clearing any vegetation, log or rubble piles to avoid harming hedgehog that may be sheltering within the site.
- If a hedgehog is found (without young) within the site between April and October inclusive, then it should be carefully relocated to an area outside the development area that offers immediate shelter.
- If a nesting hedgehog with young is found between May and October inclusive (breeding season) or if a hibernating hedgehog is found between November and March inclusive (hibernating season) then an ecologist should be contacted immediately for advice.
- All holes and excavations should be covered over each night to prevent animals from being trapped or injured. If this is not possible, a structure/plank should be placed into the hole to enable animals to escape.

Badger

9.8 The occasional presence of badgers within the site cannot be entirely ruled out. The mitigation measures outlined below should be followed to account for potential individual badger activity.

9.9 All holes and excavations should be covered over each night to prevent animals from being trapped or injured. If this is not possible, a structure/plank should be placed into the hole to enable animals to escape.

Bats

Roosting bats in structures

9.10 Further mitigation may be required depending on the outcome of the additional emergence survey.

9.11 If roosting bats are identified, then a mitigation license will need to be sought from Natural England to enable the works to proceed.

Foraging and commuting bats

- 9.12 The site provides low suitable foraging and commuting habitat for bats, in the form of the species-rich native hedgerow with trees, the site also has connectivity to other areas of suitable foraging habitat for bats in the surrounding landscape.
- 9.13 Due to the low suitability for foraging and commuting bats, the lighting mitigation detailed below should be followed, for any external lighting proposed.
- 9.14 The following mitigation is recommended to reduce the effects of any external lighting on nocturnal animals, such as foraging and commuting bats, that may utilise the site boundaries.
- During the construction phase, works should be restricted to day-light hours.
 - Any proposed external lighting should be directed away from the site boundaries to minimise impacts to bats and other nocturnal animals. The lighting scheme should be reviewed by an ecologist to ensure the designs will reduce the effects of external lighting.
- 9.15 If any post-development lighting is proposed, the following lighting guidance should be followed, to avoid disturbing nocturnal mammals and bats in the site boundaries.
- 9.16 Note 8 Bats and Artificial Lighting ([Guidance Note 8 Bats and Artificial Lighting | Institution of Lighting Professionals](#))¹⁰ should be followed:
- A sensitive lighting scheme should be designed to minimise impacts to foraging bats and other nocturnal species, when choosing luminaires, all luminaires should lack UV elements such as metal halide compact fluorescent source as, LED luminaires should also be used where possible due to the sharp-cut-off lower intensity and dimming capability. Where warm white light sources (2700 Kelvin or lower) are used these should be adapted to reduce the blue light component.
 - If external lighting is to be installed, they should be mounted horizontally, with no light output above 90 degrees or upwards and where appropriate should be set on a motion-sensor and set for short periods of time. The lux used within the lighting should not exceed 1 lux.

Invasive Non-Native Species

- 9.17 Cherry laurel, a Schedule 9 invasive non-native species, was recorded along the southern site boundary and within the non-native/ornamental hedgerow as a garden escape from a neighbouring garden. Measures will include but not be limited to the following:
- If the hedgerow needs to be cut during the works, a specialist contractor should be appointed for the controlled disposal of cuttings to prevent the cherry laurel from spreading into the wild.

¹⁰ [Guidance Note 8 Bats and Artificial Lighting | Institution of Lighting Professionals](#)

10. OPPORTUNITIES FOR ECOLOGICAL ENHANCEMENT

- 10.1 In addition to the mitigation measures set out above, ecological enhancements should be incorporated into the proposed development to contribute towards the objectives of planning legislation.
- 10.2 The National Planning Policy Framework (NPPF) was first published on 27th March 2012 and updated on 7th February 2025. This sets out the government's planning policies for England and how these are expected to be applied. The NPPF states that "opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity" (Para 186).
- 10.3 Proposals provide opportunities to enhance the site through habitat enhancements to benefit a range of species.

Bird boxes

- 10.4 The site provides an opportunity to increase bird nesting habitat through the installation of two bird boxes within the retained species-rich native hedgerows away from the proposed dwelling
- 10.5 Boxes suitable for urban environments will be installed such as the Schwegler Nestbox 1B¹¹ (1B Schwegler Nest Box | NHBS Practical Conservation Equipment), (Photo in Appendix D) on north and east elevations of the trees to provide nesting habitat for hole nesting bird species.
- 10.6 Bird nest boxes should be installed at a height of at least 2m above ground level, sheltered from the weather to prevent rain entering the box and not too close to other nest boxes. Further recommendations can be found at the British Trust of Ornithology (BTO) website¹².
- 10.7 All active bird nests and roosts are protected under the Wildlife and Countryside Act, 1981 and as such maintenance that may impact these boxes must be undertaken outside of the bird nesting season (avoiding March to August inclusive).

Bat boxes

- 10.8 The site provides an opportunity to increase bat roosting habitat through the installation of two bat boxes, one within the individual tree on site and one on the proposed new residential dwelling.
- 10.9 Bat Box 2F¹³ (Photo in Appendix D) (or similar) should be installed on south, south-east or south-west elevations within the individual tree on site.

¹¹ [1B Schwegler Nest Box | NHBS Practical Conservation Equipment](#)

¹² <https://www.bto.org/>

¹³ [2F Schwegler Bat Box \(General Purpose\) | NHBS Practical Conservation Equipment](#)

10.10 Ibstock Enclosed Bat Box C¹⁴ (Photo in Appendix D) (or similar) could be installed on the south elevation of the proposed residential dwelling to provide roosting opportunities for a variety of bat species.

10.11 Two Bat boxes will be installed as per recommendations from the Bat Conservation Trust (Bat Conservation Trust, 2025):

- Where bats are known to feed and navigate (close to hedges and tree lines).
- Ideally at least 4m above the ground (where safe installation is possible).
- Away from artificial light sources (to protect them from predation).
- Sheltered from strong winds; and
- Exposed to the sun for part of the day (usually south, south-east or south-west).

10.12 Bat roosts are afforded strict legal protection under the Habitats and Species Regulations 2019 and the Wildlife and Countryside Act 1981(as amended) and therefore any actions that may impact these boxes will first require inspection by a licenced bat ecologist.

Log piles

10.13 The creation of log piles (Photo in Appendix D) in suitable locations within the anticipated retained grassland would provide sheltering and foraging habitat for small mammals, reptiles and invertebrates.

10.14 Log piles should be constructed from untreated deciduous logs and should measure at least 2m in length, 1m in width and 0.5m in height. Log piles should be constructed at a variety of orientations to the sun to provide different microclimates for invertebrates.

Wildflower meadow enhancement

10.15 Enhancement of the modified grassland to wildflower meadow, would provide foraging and shelter for birds, invertebrates and, indirectly, food sources for bats.

10.16 Grassland could be overseeded with an appropriate seed and wildflower mix for the soil type.

10.17 RHS recommendations for rich grassland creation are as follows (RHS, 2024):

- Most seed mixes can be sown in early to mid-spring (March/April).
- Species-rich grassland areas should be created in areas of full sun with well-drained soil.
- Prior to seeding remove all grass and flower species from the area, this included perennial weeds such as nettles and docks, all roots should be removed.
- Fork over the soil to break up any compaction or lumps.
- Leave the soil to settle for four to six weeks, this will allow missed weeds to germinate that can then be raked off to create a level surface.

¹⁴ [Ibstock Enclosed Bat Box 'C' | NHBS Practical Conservation Equipment](#)

- Plant the seed mix and water regularly (if it doesn't rain) until the young plants are well-rooted.
- Maintenance over the summer would involve removing any obvious weeds, this will help ensure wildflowers aren't outcompeted.

Hedgerow enhancement

10.18 Existing hedgerows should be enhanced within the site to provide nesting and foraging habitat for birds, small mammals and invertebrates. Species such as hawthorn *Crataegus monogyna*, blackthorn *Prunus spinosa*, hazel *Corylus avellana*, dogwood *Cornus sanguinea*, spindle *Euonymus europaeus*, guelder-rose *Viburnum opulus*, wayfaring-tree *Viburnum lantana*, dog-rose *Rosa canina*, hornbeam *Carpinus betulus* and pedunculate oak *Quercus robur* could be planted within gaps of the existing hedgerow.

10.19 Management of the hedgerow should involve rotational cutting avoiding the nesting bird season. Management should be undertaken as per advice provided by Buglife (Buglife, 2023):

- Cutting will take place every three or more years allowing the hedgerow to produce flowers and berries and achieve a better structure.
- Cutting will occur after most of the berries have gone, late winter is the optimum time.
- The growth of bramble will be managed. Bramble produces food sources for birds and small mammals; however, bramble will not dominate a hedgerow.

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12. APPENDICES

Appendix A: Wildlife Legislation and Policy

12.1 This Appendix provides an overview of the framework of legislation and policy which underpins nature conservation and is a material consideration in the planning process in England. The reader should refer to the original legislation for the definitive interpretation.

12.2 For further information, please see:

<https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications>

and

<https://www.gov.uk/government/policies/protecting-biodiversity-and-ecosystems-at-home-and-abroad/supporting-pages/species-protection>

Relevant Legislation	Description
EU Directives	
Habitats Directive (92/43/EEC)	Required protection of natural habitats, wild flora, and fauna through the designation of Special Areas of Conservation (SAC) which support habitats listed on Annex I and species listed on Annex II of the Directive. Special protection measures are afforded to species listed on Annex IV, V and VI (European Protected Species). Introduces the precautionary principal which (with some exception) permits projects only if no adverse effect on site integrity is ascertained. Transposed into English law via the Conservation of Habitats and Species Regulations 2019.
Wild Birds Directive (79/409/EEC)	Aims to maintain ornithological and habitat diversity through the creation of Special Protection Area (SPA) which aim to maintain ornithological and habitat diversity through the entire European range. Provides a framework for the conservation, management, and human interaction with wild birds in Europe and includes measures to prevent the introduction of non-native species. Special protection measures are afforded to species listed on Annex I. Transposed into English law via the Conservation of Habitats and Species Regulations 2017.
English Legislation	
Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019	Provides for the protection of Natura 2000 sites (Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites), European Protected Species and habitats. European Protected Species are protected from deliberate capture, injury or killing; deliberate disturbance of a European Protected Species, such that it impairs their ability to breed, reproduce or rear their young, hibernate or migrate or significantly affect their local distribution or abundance; deliberately take or destroy effect; damage or destroy a breeding site or resting place; keep, transport, sell or exchange any live, dead, or part of a European Protected Species. European Protected Species include, but are not limited to:

Relevant Legislation	Description
	Great crested newt Natterjack Toad Otter Smooth Snake Sand Lizard All bat species Hazel Dormouse
Wildlife and Countryside Act 1981, as amended	The WCA, as amended, consolidates, and amends pre-existing national wildlife legislation in order to implement the Bern Convention and the Birds Directive. It complements the Habitat Regulations 2017, offering protection to a wider range of species. The Act also provides for the designation and protection of national conservation sites of value for their floral, faunal, or geological features, termed Sites of Special Scientific Interest (SSSIs). Schedules of the act provide lists of protected species, both flora and fauna, and detail the possible offences that apply to these species.
Countryside and Right of Way Act 2000	The CROW Act, introduced in England and Wales in 2000, amends and strengthens existing wildlife legislation detailed in the WCA. It places a duty on government departments and the National Assembly for Wales to have regard for biodiversity and provides increased powers for the protection and maintenance of SSSIs. The Act also contains lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.
Natural Environment and Rural Communities Act 2006	Section 40 of the Act places a duty on local authorities to have regard to the conservation of biodiversity in England whilst carrying out their normal functions. Section 41 comprises a list of Habitats of Principal Importance (HPI) and Species of Principal Importance (SPI) which should be considered.
Wild Mammals (Protection) Act 1996	This Act makes it an offense for any person to mutilate, kick, beat, nail, or otherwise impale, stab, burn, stone, crush, drown, drag, or asphyxiate any wild mammal with intent to inflict unnecessary suffering.
Planning Policy	
National Planning Policy Framework and Practice Guidance	The National Planning Policy Framework (NPPF) was first published on 27th March 2012 and updated on 7th February 2025. This sets out the government's planning policies for England and how these are expected to be applied. The government circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact within the Planning System, which accompanied PPS9, still remains valid. A presumption towards sustainable development is at the heart of the NPPF. This presumption does not apply however where developments require appropriate assessment under the Birds or Habitats Directives.

Relevant Legislation	Description
	Chapter 15, on conserving and enhancing the natural environment, sets out how the planning system should contribute to and enhance the natural and local environment by: • protecting and enhancing existing sites of biodiversity value; • minimising impacts on and providing net gains for biodiversity; and, • establishing coherent ecological networks. If a proposed development would result in significant harm to the natural environment which cannot be avoided (through the use of an alternative site with less harmful impacts), mitigated or compensated for (as a last resort) then planning permission should be refused. With respect to development on land within or outside of a Site of Special Scientific Interest (SSSI) which is likely to have an adverse effect (either alone or in-combination with other developments) would only be permitted where the benefits of the proposed development clearly outweigh the impacts on the SSSI itself, and the wider network of SSSIs. Development resulting in the loss of deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons for the development, and a suitable compensation strategy is provided. Chapter 15 identifies that development whose primary objective is to conserve or enhance biodiversity should be supported and opportunities to incorporate biodiversity improvements in and around development should be encouraged, especially where this can secure measurable net gains for biodiversity. Chapter 11, making effective use of the land, sets out how the planning system should promote use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. Opportunities for achieving net environmental gains, including new habitat creation, are encouraged. In March 2014, the Department for Communities and Local Government released guidance to support the National Planning Policy Framework (NPPF), known as the National Planning Practice Guidance (NPPG). This has been produced to provide guidance for planners and communities which will help deliver high quality development and sustainable growth in England. The guidance includes a section entitled 'Natural Environment: Biodiversity, geodiversity and ecosystems and green infrastructure', which was updated in July 2019. This document sets out information with respect to the following: • the statutory basis for seeking to conserve and enhance biodiversity. • the local planning authority's requirements for planning for biodiversity. • what local ecological networks are and how to identify and map them;

Relevant Legislation	Description
	• how plan-making bodies identify and safeguard Local Wildlife Sites, including Standard Criteria for Local Wildlife Sites; • the sources of ecological evidence; • the legal obligations on local planning authorities and developers regarding statutory designated sites and protected species; • definition of green infrastructure; • where biodiversity should be taken into account in preparing a planning application; • how policy should be applied to avoid, mitigate, or compensate for significant harm to biodiversity and how mitigation and compensation measures can be ensured; • definitions of biodiversity net gain including information on how it can be achieved and assessed; and, • the consideration of ancient woodlands and veteran trees in planning decisions and how potential impacts can be assessed. The NPPG July 2019 issue also includes a section entitled 'Appropriate assessment: Guidance on the use of Habitats Regulations Assessment' which provides information in relation to Habitats Regulations Assessment processes, contents, and approaches in light of case law. This guidance will be relevant to those projects and plans which have the potential to impact on European Sites and European Offshore Marine Sites identified under the Conservation of Habitats and Species Regulations 2017 (as amended).
ODPM Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within the Planning System (2005)	The Government's Office of the Deputy Prime Minister (ODPM) Circular 06/05 (ODPM 2005) presents the legal requirement for planning authorities with regard to statutory designated sites. Planning approval should not be granted where impacts to statutory designated sites that are not connected to the site maintenance for nature conservation or will have a significant effect on the site's conservation objectives and/or affect the site's integrity. Permission may be granted if the proposed development overrides public interest.
Gravesham Borough Council Local Plan and Strategy review¹⁵	Proposed Policy GI 4: Trees, Hedgerows and Woodland Development should be designed to retain trees, hedgerows and woodland that contribute positively to the amenity of the site and surrounding area and which are important in terms of landscape, townscape, biodiversity or heritage. Consideration should be given to the incorporation of trees and hedgerows within new development in the interests of sustainability, to integrate with and improve the quality of the local environment and to assist in place making. The use of

¹⁵ [Gravesham-local-plan-and-strategy-review-.pdf](#)

Relevant Legislation	Description
	locally sourced natural species in planting schemes will be expected unless otherwise justified as an exception. Proposals which threaten the future retention of trees, hedgerows and woodland or other landscape features of importance to a site's character, the amenity of the surrounding area or to wildlife will not be permitted unless the need for, and benefits of, the development in that location clearly outweigh the loss and adequate mitigation and compensation measures can be secured. In evaluating proposals, the greatest weight will be accorded the retention and protection from harm of areas of ancient woodland and aged and veteran trees, the loss of which will only be allowed in exceptional circumstances where the public benefit would clearly outweigh the loss or deterioration of habitat and a suitable compensation strategy exists. Development proposals that have the potential to result in the loss of or harm to trees, hedgerows or woodland should be supported by a tree survey, arboricultural report and ecological report prepared by a suitably qualified professional setting out: • The location, species, size, health and characteristics of any affected trees, hedgerows or woodland including root spread on or adjoining the site likely to be affected by the development; • The extent of proposed works and development relative to the features identified together with a plan and schedule of any trees, hedgerow or areas of woodland including root spread that would need to be removed or otherwise modified to accommodate the development; • A plan and schedule of those trees, hedgerows or areas of woodland to be retained; • The measures to be taken during the course of construction to avoid damage to those trees, hedgerows or areas of woodland to be retained; • The ecological value of the assets to be lost and measures to be taken to avoid any unacceptable adverse impact on any nature conservation interest as a result of works to trees, hedgerows or areas of woodland; and • Outline proposals for how any loss or damage to trees, hedgerows or areas of woodland will be mitigated to secure environmental net gain. Where the loss of trees, hedgerows or woodland have a potential landscape impact, the proposal should also be supported by a landscape report prepared by a suitably qualified person detailing those impacts and proposed means of mitigation Where planning permission is granted for proposals that result in the loss of or damage to trees, hedgerows or areas of woodland, conditions will be imposed requiring the submission of a final landscaping scheme for the prior written approval of the Council and details of how that landscaping will be maintained in the long-term, including provision for the replacement of planting that dies or becomes diseased before it becomes established.

Relevant Legislation	Description
	Policy GI 6: Biodiversity Applications resulting in significant harm to biodiversity which cannot be avoided, mitigated or compensated for will not be permitted unless material considerations indicate otherwise. In addition to the requirements set out above: • Development that will have an adverse effect on the integrity of international/ European designated sites either alone or in combination with other plans or projects will not be permitted unless otherwise allowed for under national legislation and policy. • Development that will have an adverse effect on nationally designated sites either alone or in combination will not be permitted unless the benefits of the development (including overriding public interest) clearly outweigh harm and there is no acceptable alternative solution that would avoid such impacts. • Development resulting in the loss or deterioration of irreplaceable habitats will not be permitted unless there are wholly exceptional reasons where the public benefit would clearly outweigh such loss or deterioration and a suitable, acceptable and deliverable compensation strategy exists. • Development should avoid harm to locally identified biodiversity assets (including Local Wildlife Sites, Local Nature Reserves and Roadside Nature Reserves) as well as priority and locally important habitats and species, in accordance with national policy.
Protection of Protected Habitats	
Habitats of Principal Importance	Section 41 of the NERC Act 2006 details 56 Habitats of Principal Importance, divided into 10 broad categories: arable and horticulture, boundary, coastal, freshwater, grassland, heathland, inland rock, marine, wetland, and woodland.
Ancient Woodland and Veteran Trees	The National Planning Policy Framework (2012) states that 'Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss'. In addition, Natural England's standing advice for ancient woodland indicates that a 15m buffer is retained between ancient woodland and any works or development. Ancient woodlands, and ancient and veteran trees, may also be protected by Tree Preservation Orders.
Non-native Invasive Plant Species	Schedule 9 of the Wildlife and Countryside Act 1981, as amended is a list of non-native plant species for which Section 14 of the Act applies. It is an offence to plant or otherwise cause to grow in the wild species listed under Schedule 9 of the act. These include, but are not limited to:

Relevant Legislation	Description
	Himalayan Balsam Cotoneaster sp. Japanese Knotweed Giant Hogweed

Appendix B: Photographs



Photograph 1. Developed land, sealed surface outside of the stable block



Photograph 2. Developed land, sealed surface, access road



Photograph 3. Example of modified grassland on site



Photograph 4. Stable building on site



Photograph 5. Individual tree on site



Photograph 6. Example of the species-rich native hedgerows on site



Photograph 7. Non-native / ornamental hedgerow on site



Photograph 8. Artificial unvegetated, unsealed surface, existing track on site



Photograph 9. Potential bat roosting feature



Photograph 10. Potential bat roosting feature



Photograph 11. Potential bat roosting feature



Photograph 12. Existing horse school

Appendix C: Designations



Appendix D: Ecological Enhancements



Schwegler Nestbox 1B



Bat Box 2F



Ibstock Enclosed Bat Box 'C'



Log Piles

Appendix E: Ecological Features on site

