

Preliminary Roost Assessment (Bats) and Nesting Bird Assessment

Queens Farm, Queens Farm Road, Shorne,
Gravesend, Kent



Date: April 2026

Revision: Original

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1 Summary

Site	Queens Farm, Queens Farm Road, Shorne, Gravesend, Kent, DA12 3HU
OS Grid Ref.	TQ 69323 73365
Client	Hobbs Parker
Purpose	To support a full planning application
Date of survey	24 th March 2026
Author	Caitlin Laver BSc (Hons) MSc ACIEEM, Ecologist
Reviewed and Approved by	Flora Haynes BSc (Hons) MCIEEM, Senior Ecologist

Consideration	Description	Recommendations
Roosting bats	Buildings B1 and B2 have negligible suitability to support bats during the active and hibernation seasons.	No further action is required.
Nesting bird check	Building B1 has suitability for nesting birds with suitability for species such as feral pigeon to be nesting all year round.	A bird check will be carried out by a competent person prior to any works.
Avoidance measures	Foraging and commuting bats may be present within the nearby habitats.	Implement a sensitive lighting strategy.
Enhancement measures	Bird box	Install one long-lasting general bird box onto one of the buildings.
	Bat box	Install one long-lasting bat box onto one of the buildings.

2 Introduction

2.1 Background

South East Ecology Ltd. was commissioned by Hobbs Parker to undertake a Preliminary Roost Assessment (PRA) for bats and a nesting bird assessment at Queens Farm, Queens Farm Road, Shorne, Gravesend, DA12 3HU herein referred to as 'the site'. This report will support a planning application for repair and renovation works to the roof.

2.2 Site Location & Description

The site is located to the north of the village of Shorne near Gravesend, at central Ordnance Survey Grid Reference TQ 69323 73365. The site totals c. 0.3ha, comprising two buildings and developed land; sealed surface. **Figure 2.1** shows an aerial image of the habitats surrounding the site.

The site is connected to suitable foraging and commuting habitat for bats, with hedgerows present around many of the nearby arable fields. A small, wooded area with a large pond is also located c. 190m to the north-west of the site, providing suitable foraging habitat for bats. This links to further suitable habitat comprising a vegetated railway line, marshland and ditches to the north.

Figure 2.1: Site location (red line) showing surrounding landscape (MAGIC Maps, 2026).

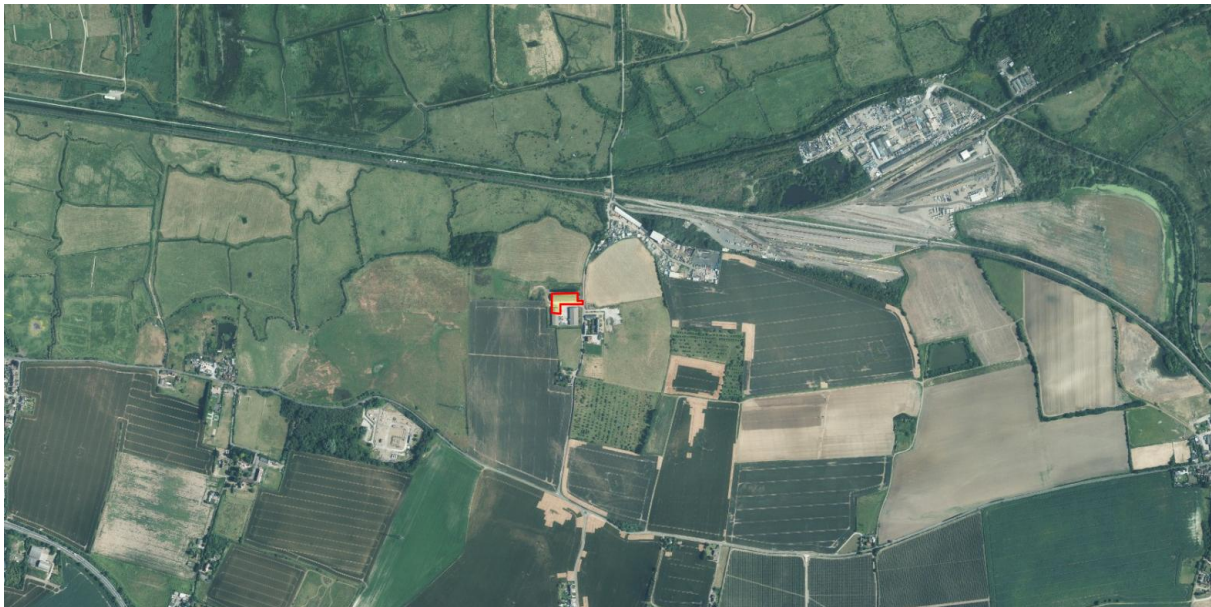
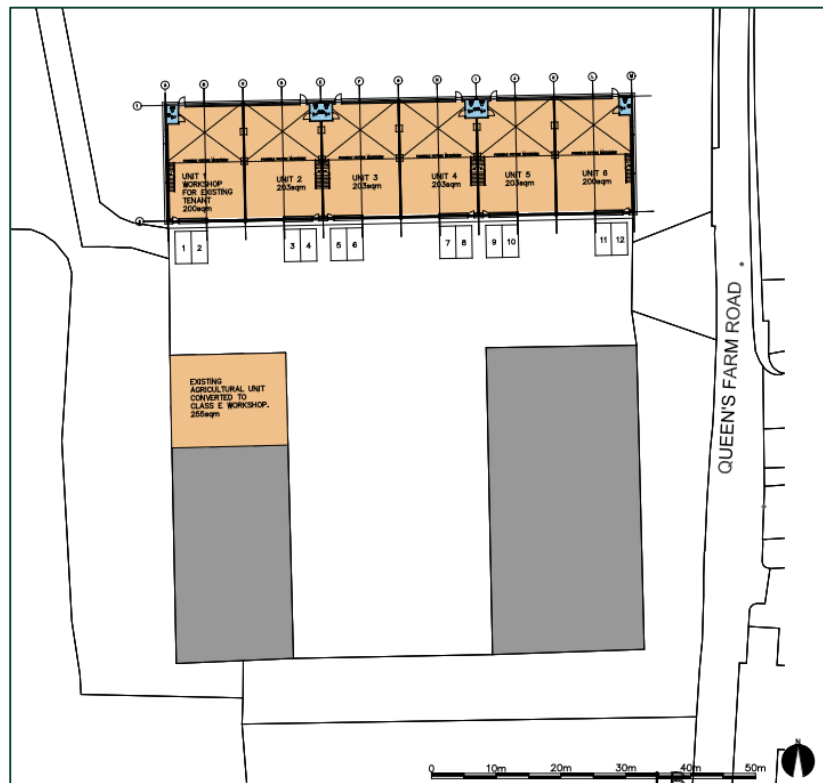


Figure 2.3: Proposed development plan (Lee Evans Partnership LLP, 2025, Drawing Number 9446-A-L-(03)-0001).



3 Methodology

3.1 Surveyor

The site was surveyed by Ecologist Caitlin Laver, who is licensed to survey for bats (level 2) (licence number 2025-84290-CL18-BAT). Caitlin has been a practising bat ecologist in England since 2022. She is also an Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and therefore subject to the CIEEM Professional Code of Conduct.

This report was reviewed by Senior Ecologist Flora Haynes, who is licensed to survey for bats (level 2) (licence number, 2025-12754-CL18-BAT). Flora has been a practising bat ecologist in England since 2013. She is a Full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and therefore subject to the CIEEM Professional Code of Conduct.

3.2 Desk Study

Natural England's Multi-Agency Geographic Information for the Countryside (MAGIC) database was accessed on 23rd March 2026 for information on statutory sites designated for bats and any granted EPSM licences granted for bats within 2km of the site.

3.3 Site Survey

A daytime assessment was undertaken on the 24th March 2026. The weather conditions during the survey were noted to be 13°C with a moderate breeze (Beaufort scale 4) and 100% cloud cover. A full external and internal assessment of the buildings within the site was carried out using, where relevant, binoculars and a high-power torch.

3.3.1 Roosting Bats

The buildings on site were assessed for suitability to support roosting bats per the scales in **Table 3.1**. Both buildings were described and surveyed for bats and their evidence, which includes droppings, staining, scratch marks and feeding remains.

Table 3.1: Classifying the bat roosting suitability of buildings (Collins, 2023).

No roosting suitability	No features likely to be used by any roosting bats at any time of year.
Negligible roosting suitability	Buildings with few, if any, features suitable for roosting, however a small amount of uncertainty remains as bats can use small and apparently unsuitable features on occasion.

Low roosting suitability	One or more potential roost sites that could be used by individual bats opportunistically at any time of year. The features 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.
Moderate roosting suitability	One or more potential roost sites that could be used by bats due to their space, shelter, protection, appropriate conditions and/or suitable surrounding habitat but are unlikely to support a roost of high conservation status (e.g. maternity or hibernation).
High roosting suitability	One or more potential roost sites that could be used by larger numbers of bats on a more regular basis/ longer periods of time, due to their space, shelter, protection, appropriate conditions and/or suitable surrounding habitat. These structures could support to support roosts of high conservation status (e.g. maternity or hibernation).
Confirmed roost	Evidence of bat occupation found.

3.3.1.1 Foraging and Commuting

Potential for the site to support foraging and commuting bats was assessed in line with the Bat Conservation Trust (BCT) Bat Surveys for Professional Ecologists Good Practice Guidelines (Collins, 2023) as outlined in **Table 3.2**.

Table 3.2: Classifying the suitability of bat foraging and commuting habitat (Collins, 2023)

None	No habitat features on site likely to be used by foraging or commuting bats.
Negligible	No obvious habitat features on site likely to be used by commuting or foraging bats, but uncertainty remains to account for non-standard bat behaviour.
Low	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or un-vegetated stream, but isolated or poorly connected to habitat in the surrounding landscape. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in parkland) or a patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that bats may use for commuting such as tree-lines and scrub or linked back gardens. Habitat that connects to the wider landscape that bats may use for foraging such as trees, scrub grassland and water.

High	Continuous, high quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, tree-lines 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.

3.3.2 Nesting Birds

The site was also assessed for suitability for nesting birds; this includes identifying structures that could be used for nesting as well as access to internal features.

3.4 Evaluation

The evaluation of any bat roosts and foraging / commuting habitat is made with reference to Valuing Bats in Ecological Impact Assessment (Wray, et al., 2010) and the Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018).

3.5 Limitations and Assumptions

Access was available to the entire site and the baseline conditions reported represent those identified at the time of the survey.

Therefore, the survey results are not significantly limited and are considered to represent a valid assessment of the potential for roosting bats within the site.

On the assumption that site conditions and habitats remain unchanged, the PRA will remain valid for one year, i.e. until March 2027, and should be updated if works have not yet commenced within this timeframe. Please note that for licencing purposes Natural England usually require data from the most recent relevant season.

4 Results and Evaluation

The following section presents the results of the desk-study and field survey, together with an evaluation of potentially suitable bat roosting habitat on site.

4.1 Desk Study

4.1.1 Statutory Sites

No statutory conservation sites within 2km of the site have been designated for bats. No further action is required in terms of bat-designated protected sites.

The South Thames Estuary and Marshes SSSI, SPA and Ramsar site is located within 2km of the site and has been designated for breeding birds with species including avocet *Recurvirostra avosetta*, black-tailed godwit *Limosa limosa*, dunlin *Calidris alpina* and redshank *Tringa totanus*. No birds that the SSSI, SPA and Ramsar are designated for are likely to nest within the site due to the lack of suitable habitat. Therefore, no further action is required in terms of bird-designated protected sites.

The site is located within the South Thames Estuary and Marshes SSSI Impact Risk Zone; however, the development does not meet criteria for impacts that would likely lead to a significant effect on this SSSI due to the development being limited to the existing hard-standing. Therefore, no consultation with Natural England and no mitigation is required for this SSSI.

4.2 Nesting Bird Survey

The following birds were incidentally recorded during the survey: robin *Erithacus rubecula*, wren *Troglodytes troglodytes*, feral pigeon *Columba livia* and skylark *Alauda arvensis* with the skylarks likely nesting in the habitat within the arable fields.

No trees are located within the site but the buildings do offer nesting opportunities for birds with access to the building comprising an open front on the southern elevation. Feral pigeons were noted within Building B1 but no nests were visible. The site therefore holds **high** potential for widespread species of nesting bird. Building B2 did not have any external features suitable for nesting birds and there was no internal access.

The site overall is, however, considered to hold **negligible** potential for bird species listed as Annex I (Birds Directive) and / or Schedule 1 (WCA). The small nature of the site, lack of suitable habitats and heavy levels of disturbance mean that the site has **negligible** potential for notable wintering bird species and assemblages.

Precautionary action for nesting birds is recommended in **Section 5**.

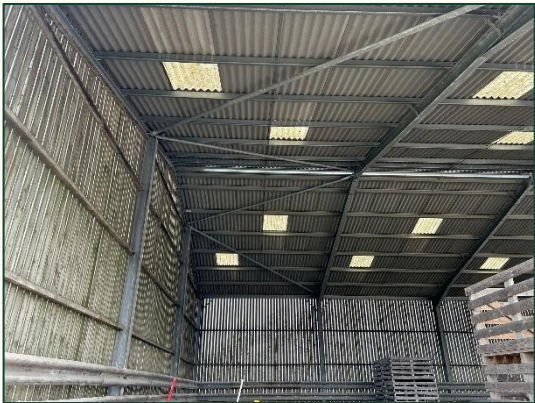
4.3 Bats

No bat Mitigation Licences granted by Natural England are located within 1km of the site (MAGIC, 2026).

4.3.1.1 Roosting (Buildings)

The bat roost suitability of the buildings on site that are proposed to be impacted has been described in **Table 4.1**. Refer to **Appendix 2** for the building locations.

Table 4.1: Bat Roost Suitability of Buildings

Building	Evidence of bats	Potential roost and access features	Bat roosting suitability
B1	None	Open to the south but limited suitability due to the metal beams within the building. No crevice features present and high light levels throughout.	Negligible – active season Negligible – hibernation season
B1: Southern elevation  B1: Internal roof area at the western end of the building. 			
B2	None	Small gaps (c. 3 inches in length) externally between the bricks and metal cladding but likely to be unsuitable due to temperature fluctuations of the metal and exposed nature of the features. No gaps lead to larger crevice spaces and there are no access points,	Negligible – active season Negligible – hibernation season



Based on the results of the preliminary roost assessment, Buildings B1 and B2 hold **negligible** suitability for roosting bats during the active and hibernation seasons.

No further action for roosting bats is required.

4.3.1.2 Foraging and Commuting

No suitable habitat for foraging and commuting bats was recorded within the site but suitable habitat is located within the immediate area including hedgerows which link to further suitable habitat.

The site itself is of **negligible** suitability for foraging and commuting bats, due to a lack of suitable habitats, and the proposals do not include any increase in artificial lighting on site which may impact adjacent habitats. It is however possible that commuting bats may occasionally pass over the site and forage and commute within adjacent habitats and be impacted by any temporary increase in artificial

lighting during the works. Precautionary measures have therefore been recommended in **Section 5**.

5 Further Surveys, Avoidance and Mitigation Recommendations

This section discusses recommendations for further surveys, avoidance and mitigation in line with relevant wildlife legislation and planning policy (see **Appendix 1**).

5.1 Avoidance / Mitigation Measures

5.1.1 Nesting Birds

There is potential for birds such as feral pigeons to nest in Building B1 all year round. A competent person should therefore check ahead of works to Building B1 for any active birds' nests irrespective of time of year. Any active nests identified must be retained in situ with a suitable buffer (to be determined by an ecologist) until the chicks have fledged and the nest is no longer active.

Once works have started, the regular disturbance should deter nesting birds from any retained features. However, if works are paused for more than 72 hours during the breeding season, suitable features should be blocked until works resume to deter nesting birds from moving in, or a check for nesting birds should be carried out immediately before works resume.

5.1.2 Bats - Foraging and Commuting

The following measures should be implemented within the development to reduce impacts on foraging and commuting bats caused by artificial lighting (BCT & ILP, 2023):

- Direct any task lighting used during construction away from off-site trees and hedgerows and any newly installed bat boxes;
- Set any necessary security lighting on short timers with a sensitivity to large moving objects only;
- Limit lighting times to provide dark periods; and
- LED light sources should be used wherever possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capabilities. A warm spectrum light (ideally <2700 Kelvin) should be used to reduce the blue light component. Lights should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012). Luminaires should be mounted on the horizontal, i.e. with no upward tilt. Avoid the use of UV light and do not use metal halide, fluorescent light sources.

6 Enhancements

The recommendations below are designed to enhance the value of the site for bats, as encouraged through the National Planning Policy Framework (2021) and required as part of the adopted Local Plan:

- 1) Install one Schwegler 1B General Bird Box (or suitable long-lasting alternative) onto a building (new or retained) at least 3m above the ground, avoiding direct sunlight (not directly south-facing) and prevailing wind.
- 2) Install one Greenwood Half and Half Bat Box Bat Box (or suitable long-lasting, self-cleaning alternative) onto a building (new or retained). Install the bat box at least 4m above the ground and face in a southerly or easterly direction, so that they receive sun for part of the day. Place box clear of any obstructions to allow access for bats (e.g. over-hanging branches).

7 Conclusion

The development can proceed with minimal impact to habitats and protected / notable species if the avoidance and mitigation measures outlined within **Section 5.1** are implemented.

There is also the opportunity to enhance the development for local wildlife in the long-term by implementing the enhancement measures detailed in **Section 6**.

8 References

Bat Conservation Trust, 2004. Gardening for bats, London: Bat Conservation Trust.

Bat Conservation Trust, 2022. Interim Guidance Note: Use of night vision aids for bat emergence surveys and further comment on dawn surveys.

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MHCLG, 2025. National Planning Policy Framework,. [Online]
Available at: [National Planning Policy Framework - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115114/nppf-2019.pdf)

Natural England, 2025. MAGIC Map Application. [Online]
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Wray, S., Wells, D., Long, E. & Mitchell-Jones, A., 2010. Valuing Bats in Ecological Impact Assessment.. In: Chartered Institute of Ecology and Environmental Management - In Practice 70. Winchester: CIEEM, pp. 23-25.

9 Appendix 1 Legislation & Planning Policies

Legislation

Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (CHSR) 2019

The CHSR 2019 transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (Habitats Directive) into English law, making it an offence to deliberately capture, kill or disturb wild animals listed under Schedule 2 of the Regulations. It is also an offence to damage or destroy a breeding site or resting place of such an animal (even if the animal is not present at the time).

The purpose of the 2019 amendments applied to the legislation were to ensure the continued functionality of the Regulations once the UK has left the European Union, with no policy changes included.

Wildlife & Countryside Act (WCA)

The WCA 1981, as amended by the Countryside and Rights of Way Act (CROW) 2000 and the Natural Environment and Rural Communities Act (NERC) 2006, consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive), making it an offence to:

- Intentionally kill, injure or take any wild bird or their eggs or nests (with certain exceptions) and disturb any bird species listed under Schedule 1 to the Act, or its dependent young while it is nesting;
- Intentionally kill, injure or take any wild animal listed under Schedule 5 to the Act; intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection by any wild animal listed under Schedule 5 to the Act; intentionally or recklessly disturb certain Schedule 5 animal species while they occupy a place used for shelter or protection;
- Pick or uproot any wild plant listed under Schedule 8 of the Act.

Sites of Special Scientific Interest (SSSI) are designated under this Act. Special Protection Areas (SPA) are strictly protected sites, designated under the Birds Directive, for rare and vulnerable birds and for regularly occurring migratory species.

Natural Environment & Rural Communities (NERC) Act

The NERC Act 2006 amends the CRoW Act, by further extending the requirement to have regard for biodiversity to all public authorities, which includes local authorities and local planning authorities and requires that the Secretary of State consults Natural England (NE) in the publication of the list of living organisms and habitat types deemed to be of principal importance in conserving biodiversity.

National Planning Policy

National Planning Policy Framework (NPPF)

The NPPF sets out current government policy on biodiversity and nature conservation and places a duty on planners to make material consideration to the effect of a development on legally protected species when considering planning application (MHCLG, 2025). The NPPF also promotes sustainable development by ensuring that developments take account of the role and value of biodiversity and that it is conserved and enhanced within a development, following the principles of the mitigation hierarchy. The goals set out within the NPPF are for developments to minimise impacts on and provide net gains for biodiversity, including at the catchment or landscape scale.

The NPPF works in conjunction with Government Circular 06/2005 'Biodiversity and Geological Conservation - Statutory Obligations and Their Impact within the Planning System'.

Regional and Local Planning Policy and Guidance

Local Plans & Core Policies

County, District and Local Councils have adopted Plans and associated core policy and supplementary documents that include targets and policies which aim to maintain and enhance biodiversity. These are guided by the NPPF and used by Planning Authorities to inform planning decisions.

Natural England Standing Advice

Natural England has adopted national standing advice for protected species. It provides a consistent level of basic advice which can be applied to any planning application that could affect protected species. It replaces some of the individual comments that Natural England has provided in the past to local authorities.

Table 9.1: Relevant Protected Species Legislation

Species	Relevant Legislation	Level of Protection
Birds	Protection under the Wildlife and Countryside Act, 1981 (as amended).	It is an offence to: - intentionally kill, injure or take any wild bird. - intentionally take, damage or destroy nests in use or being built (including ground nesting birds). - intentionally take, damage or destroy eggs. - Species listed on Schedule 1 of the WCA or their dependant young are afforded additional protection from disturbance whilst they are at their nests.
Bats	European protected species under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Full protection under Schedule 5 of the Wildlife and Countryside Act, 1981 (as amended). Protected by the Wild Mammals (Protection) Act 1996.	It is an offence to: - intentionally kill, injure, or take any species of bat. - intentionally or recklessly disturb bats. - intentionally or recklessly damage destroy or obstruct access to bat roosts.

10 Appendix 2 Building Plan

