PRELIMINARY ECOLOGICAL APPRAISAL

Woodlands Farm
Wrotham Road
Culverstone
Kent
DA13 0RQ

Document date: 20th July 2026

Document ref: 7021E/26/01

PJC Consultancy Ltd
www.pjcconsultancy.com
contact@pjcconsultancy.com
01233 225365 - 01323 832120

Kent Office
The Watermill, Maidstone Road
Ashford, Kent.
TN26 1AE.

This report has been prepared by

PJC Consultancy Ltd

on behalf of

[redacted]

Document Author

Naomi Cornwell BSc(Hons) MSc

Naomi is an Ecologist with six years' experience working in the ecological consultancy industry. She gained a BSc(Hons) in Animal Conservation and Biodiversity at Greenwich University in 2018 and an MSc in Oceanography (Ecological and Biological pathway) at the University of Southampton in 2021. In addition, Naomi is a Natural England class one licence holder for bats and accredited agent under a BTO Schedule 1 Disturbance Permit for nest recording of barn owl (and other birds).

Checked and Authorised By

Thomas Knight BSc(Hons) MSc MCIEEM

Tom is Director of Ecology with over 15 years' experience working in the ecological consultancy industry. He gained a BSc(Hons) in Wildlife Conservation at the University of Kent in 2010 and an MSc in Conservation and Biodiversity at the University of Exeter in 2011. Tom is also a full professional member of the Chartered Institute of Ecology and Environmental Management (CIEEM). In addition, Tom is a Natural England class one licence holder for both bats and great crested newts.

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1 EXECUTIVE SUMMARY

PJC Consultancy Ltd was commissioned by [redacted] to provide a Preliminary Ecological Appraisal for Woodlands Farm, Wrotham Road, Culverstone, Kent, DA13 0RQ. The purpose was to classify the habitats present, highlight the potential of the site to support protected species, and recommend suitable avoidance, mitigation, compensation and ecological enhancement measures where appropriate. When implemented successfully, these recommendations will ensure that the development proceeds in line with all relevant laws pertaining protected species and their habitats, as well as contributing to an increase in site biodiversity. This report has been produced in accordance with National Planning Policy Framework NPPF (2024) – more specifically Chapter 15 'Conserving and Enhancing the Natural Environment' as well as the Gravesham Local Plan Core Strategy (Gravesham Borough Council, 2014).

Based on current proposals, the results of the Preliminary Ecological Appraisal can be summarised in the following table:

Protected Species/Habitats	Suitable Habitat Present	Recommended Further Surveys	Ecological Mitigation
Bats (Roosting)	Two buildings (B1 and B1a) within the Site were identified as having high potential to support roosting bats. One building (B2) within the Site was identified as having low potential to support roosting bats.	Three bat emergence surveys should be undertaken on B1 and B1a between May and September inclusive. A single bat emergence survey should be undertaken on B2 between May and August inclusive.	Further requirements for mitigation, compensation and/or licences may be required for bats depending on the results of the recommended further surveys. A sensitive lighting strategy and general best construction environmental practice should be adopted during the construction and operational phases of the proposed development to direct new artificial lighting away from suitable bat foraging and commuting routes, creating dark buffer zones.
Bats (Roosting)	Trees T9, T32, and T49, within the Site were identified as having PRF-M or PRF-I potential to support roosting bats.	Trees T9, T32, and T49, are anticipated to be retained in full throughout all phases of the proposed development. Therefore, no further surveys are required, providing the avoidance and mitigation measures are	A sensitive lighting strategy and general best construction environmental practice should be adopted during the construction and operational phases of the proposed development to direct new artificial lighting away from suitable bat foraging and commuting routes, creating dark buffer zones. Should felling of trees T9, T32 and T49, become necessary, then This would be undertaken outside the core hibernation

		strictly adhered to.	period (outside November to March).
Bats (Foraging and Commuting)	The Site was identified as having moderate habitat suitability to support commuting and foraging bats.	None required, providing the avoidance and mitigation measures are strictly adhered to.	A sensitive lighting strategy and general best construction environmental practice should be adopted during the construction and operational phases of the proposed development to direct new artificial lighting away from suitable bat foraging and commuting routes, creating dark buffer zones.
Badgers	The Site was considered to provide good foraging and commuting opportunities for badgers.	None required, providing the avoidance and mitigation measures are strictly adhered to.	A pre-works check should be undertaken immediately prior to any construction works commencing to ensure no new setts have become established. Any required excavations should be excavated individually and backfilled immediately after to avoid animals becoming trapped. All chemicals onsite should be stored correctly and be made inaccessible to badgers.
Dormice	The Site was identified as providing some suitable foraging, commuting, nest building and hibernating opportunities for dormice.	None required, providing the avoidance and mitigation measures are strictly adhered to.	Retention and enhancement of all boundary vegetation and implementation of a sensitive lighting mitigation strategy. A 3m no construction buffer zone should be implemented between the retained suitable dormouse habitat and the development footprint. If habitat retention is not possible, then dormouse presence/likely absence surveys should be undertaken between April and November inclusive.
Great Crested Newts (GCN)	The Site was identified as having potential to support GCN during their terrestrial lifecycle phase. There was also suitable habitat connectivity to a network of waterbodies within a	None required, providing the avoidance and mitigation measures are strictly adhered to.	Any habitat clearance works should be undertaken in accordance with a precautionary non-licensed method statement.

	250m radius of the Site.		
Reptiles	The Site was identified as having high potential to support reptiles providing foraging, commuting, basking and hibernating opportunities.	Reptile presence/likely absence surveys should be undertaken over the active reptile season between April and September inclusive during periods with daytime air temperatures between 9-18˚C.	Further requirements for mitigation and compensation may be required for reptiles depending on the results of the recommended further surveys.
Nesting Birds	The Site was identified as having potential to support nesting birds.	None required, providing the avoidance and mitigation measures are strictly adhered to.	Habitat clearance works should be undertaken outside the main nesting bird season (March-September inclusive). Should this not be possible, all trees and buildings must be inspected by an ecologist to determine the presence/absence of any nesting birds immediately prior to clearance.
Invasive Plants	A stand of Japanese knotweed was recorded near the base of tree T27 (refer to Tree Constraints Plan for exact location) along the southern Site boundary.	None required.	A specialist contractor should be employed to manage and remove Japanese knotweed from the Site in order to prevent its spread. All habitat clearance works associated with the proposed development should be undertaken in accordance with a detailed invasive plant species method statement prepared by the specialist contractor.

2 INTRODUCTION

2.1 Instruction

2.1.1 PJC Consultancy Ltd was commissioned by [redacted] to provide a preliminary ecological appraisal (PEA) which includes an ecological walkover survey, and a daytime bat walkover (DBW) survey in support of the proposed development at Woodlands Farm, Wrotham Road, Culverstone, Kent, DA13 0RQ (hereafter referred to as the 'Site').

2.2 Survey Objectives

2.2.1 The aim of this PEA is to identify potential ecological constraints and opportunities associated with the Site by undertaking an ecological walkover survey, ecological desk study, and DBW. The objectives were to:

- Identify the habitat types present on the Site;
- Identify the potential of the Site to support protected and notable habitats and/or species;
- Identify the potential of any trees and buildings within the Site to support roosting bats;
- Highlight known or potential legal or planning policy constraints in relation to ecology and recommend avoidance, mitigation and enhancement measures to satisfy legal and planning policy requirements where appropriate; and
- Identify, where necessary, the requirement for further survey.

2.3 Documents and Information Provided

2.3.1 Development proposals are anticipated to include the demolition of all existing buildings, and the construction of 67 residential units with associated roads and private gardens.

2.3.2 The following documents were used to aid the preparation of this report:

- Proposed Site Plan ref: 002 Rev A (Dream Design Develop, June 2026);
- Tree Constraints Plan ref: PJC/7146/26/A (PJC Consultancy, May 2026); and
- Tree Survey Schedule (PJC Consultancy, May 2026).

2.4 Scope of Report

2.4.1 This PEA is only concerned with the habitats and features within the property boundaries of the Site, or in areas that have the potential to be affected by the proposed new development.

2.5 Site Description

2.5.1 The Site, approximately 3.4ha in size, is situated immediately east of Gravesend Road and south of Newlands Lane, on the outskirts of Culverstone Green village, approximately 11km south of Gravesend town centre (OS central grid reference: TQ 63474 62203). The Site is situated within a relatively rural landscape, bordered on all aspects by a mosaic of fields and isolated parcels of woodland and residential properties with gardens, intersected by a network of treelines, hedgerows and road infrastructure. The location of the Site within its environs is presented in Appendix I.

2.6 Legislation and Planning Policy

2.6.1 This PEA has been compiled with reference to relevant wildlife and countryside legislation, planning policy and the UK Biodiversity Framework. Their context and applicability is explained as appropriate in the relevant sections of the report and additional details are presented in Appendix II.

2.6.2 The key articles of relevance are:

- The Environment Act (2021);

- The Conservation of Habitats and Species (Amendment) Regulations 2017;
- The Wildlife and Countryside Act 1981, as amended (WCA);
- The Countryside and Rights of Way (CRoW) Act 2000;
- The Natural Environment and Rural Communities (NERC) Act 2006;
- National Planning Policy Framework (NPPF) 2024 (Ministry of Housing, Communities and Local Government, 2024);
- The Protection of Badgers Act 1992;
- The UK Post-2010 Biodiversity Framework (2011-2020); and
- Gravesham Local Plan Core Strategy (Gravesham Borough Council, 2014).

3 METHODOLOGY

3.1 Desk Study

3.1.1 A desk study was undertaken in May 2026 with the objective of collating and reviewing existing ecological information, and obtaining data and information held by relevant third parties.

3.1.2 In addition, datasets from Natural England (MAGIC, 2026) were reviewed to identify the presence of UK statutory designated sites and notable habitats within the zone of influence, including woodlands listed on the ancient woodland inventory, habitats of principal importance (HPI) listed on the priority habitat inventory and statutory designated sites for their nature conservation value at the national scale such as sites of scientific interest (SSSI) and at the European and/or international scale namely: special areas of conservation (SACs), special protection areas (SPAs), and internationally designated wetland (Ramsar) sites. These sites collectively are hereafter referred to as 'European Sites'. Where measurements are included with the record, these provide the distance of the designated site from the closest point of the Site.

3.1.3 Furthermore, Google Earth aerial imagery was reviewed to assess habitats within the Site and wider environment.

3.1.4 Data for sites within the zone of influence where European Protected Species Mitigation (EPSM) licences have been granted, were also reviewed. This information allows a greater understanding of the potential for European protected species to be present in the local area.

3.1.5 The zone of influence is the area over which ecological features, such as designated sites of nature conservation importance and protected and notable habitats and species, may be affected by the biophysical changes caused by the proposed development and associated activities. Due to the size of the Site and nature of the proposed development it is considered that a zone of 1km from the centre of the Site is appropriate for the gathering of information for the desk study (CIEEM, 2018).

3.2 Ecological Walkover Survey

3.2.1 An ecological walkover survey (formerly referred to as 'extended phase 1 habitat survey') was undertaken on the 7th May 2026 by Naomi Cornwell BSc(Hons) MSc (Natural England class one licence holder for bats). As part of the ecological walkover survey, habitats were identified and mapped in accordance with 'UK Habitat Classification 2.0' (UKHab Ltd, 2023) (Appendix III).

3.2.2 UK Habitat Classification 2.0 comprises a five-level 'Primary Habitat Hierarchy' and a list of 'Secondary Codes', the latter is sub-divided into Essential and Additional Codes. For the purpose of this assessment, habitats have been allocated a single Primary Habitat Code up to Level 4 as well as all associated Essential Secondary Codes, and where relevant Additional Secondary Codes.

3.2.3 The ecological walkover survey was extended to include consideration of protected and notable species in accordance with good practice guidance for preliminary ecological appraisal (CIEEM, 2017). The dominant plant species in each habitat were recorded, as were any evidence of protected and notable species. The potential for the Site to support protected and notable species was also assessed. Those ecological features not classified as a habitat are denoted using a target note.

3.3 Daytime Bat Walkover Survey

3.3.1 All buildings and trees within the Site were also subject to a DBW. The external and internal inspection of the buildings and ground inspection of trees was to assess potential roosting features (PRFs) such as those presented in Tables 1 and 2 below. The DBW was undertaken in accordance with best practice survey standards (BCT, 2023 and BTHK, 2018).

Table 1: Features of trees commonly used by bats.

Features of trees used as bat roosts	Signs indicating possible use by bats

Natural holes.	Tiny scratches around entry point.
Woodpecker holes.	Staining around entry point.
Cracks/splits in major limbs.	Bat droppings in, around or below entrance.
Loose bark.	Audible squeaking at dusk or in warm weather.
Hollows/cavities.	Flies around entry point.
Dense epicormic growth (bats may roost within it).	Distinctive smell of bats.
Bird and bat boxes.	Smoothing of surfaces around cavity.

Table 2: Features of buildings commonly used by bats.

Features of building or built structure	Signs indicating possible use by bats
Type of building.	Tiny scratches around entry point.
Age of building.	Staining around entry point.
Aspect of PRF.	Bat droppings in, around or below entry point.
Wall construction – cavity walls or rubble-filled walls.	Feeding remains below entry point.
Form of the roof – presence of gable ends, hipped roofs, nature and condition of the roof covering.	Cobweb free potential entry points.
Presence of hanging tiles, weather boarding or other forms of cladding.	Audible squeaking at dusk or in warm weather.
Nature of the eaves – sealed by a soffit or boxed eave and tightness of fit to exterior walls.	Flies around entry point.
Presence and condition of lead flashing.	Distinctive smell of bats.
Gaps under eaves, around windows, under tiles, lead flashing.	Smoothing of surfaces around entry point.
Presence and type of roof lining.	
Presence on roof insulation.	

3.3.2 The buildings and trees were assessed in accordance with the criteria listed above and assigned to one of five categories as listed in Table 3 or Table 4 below.

Table 3: Categorisation system for visual inspection of trees.

Suitability	Description
None/negligible	A tree with no features capable of supporting roosting bats or highly unlikely to be any present.
FAR	Further assessment required to establish if any PRFs are present in the tree.
PRF	A tree with at least one PRF present.

PRF-I	Features considered suitable to support individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	Features considered suitable to support multiple bats and may therefore be used by a maternity colony.

Table 4: Categorisation system for visual inspection of structures.

Category	Description
Confirmed roost	Bats discovered roosting within structure or recorded emerging from/entering structure at dusk and/or dawn. Structure found to contain conclusive evidence of occupation by bats, such as bat droppings. A confirmed record (as supplied by an established source such as the local bat group) would also apply to this category.
High suitability	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate suitability	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.
Low suitability	A structure with one or more potential roost sites that could be used by individual bats opportunistically. 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.
Negligible suitability	A structure with no features capable of supporting roosting bats.

3.4 Barn Owl Assessment

3.4.1 All identified buildings within the Site were also subject to a barn owl assessment by Naomi Cornwell BSc(Hons) MSc (accredited under licence) on 7th May 2026. The external and internal inspection was to identify evidence of barn owl presence and/or activity, including live sightings, droppings, pellets, feathers and nests. Any suitable nesting ledges and access points (holes > 75mm) were also surveyed during the assessment. The nesting barn owl assessment was undertaken in accordance with best practice survey standards (Barn Owl Trust, 2012).

3.5 Dormouse Habitat Quality Assessment

3.5.1 A habitat quality assessment of all potentially suitable dormouse habitat (namely hedgerows, scrub, and treelines) within the Site was also undertaken in accordance with best practice survey standards (Wells et al., 2025). Data were gathered to evaluate both the structural complexity and species diversity of the habitats. Species diversity was determined by recording the number of woody plant species, from a list recognised as suitable for dormice (those known to provide valuable food and nesting resources), present within an average 100m transect (High = >6 spp; Medium = 3-6 spp; Low = <3 spp). In addition, key characteristics of the treelines, scrub, and hedgerows were recorded to assess structural complexity. The structural complexity and species diversity were then used to generate a habitat quality score as outlined in Table 5 below.

Table 5: Relationship between species diversity, structural complexity and habitat quality.

		Species Diversity		
		High	**Medium**	**Low**
Structural Complexity	**High**	Excellent	Good	Fair
	Medium	Good	Good	Poor
	Low	Fair	Poor	Poor

3.6 Limitations of Survey

3.6.1 The protected species assessment provides a preliminary view of the likelihood of protected species occurring on Site, based on the suitability of the habitat and any direct evidence on Site. It should not be taken as providing a full and definitive survey of any protected species group. Additional surveys may be recommended if, on the basis of this assessment it is considered reasonably likely that protected species may be present.

3.6.2 The habitats present, and their management are likely to change over time, thus the findings of the ecological walkover survey are only considered valid for a period of up to two years.

3.6.3 Full access to building B1 roof void was not feasible during the survey due to access restrictions and thus a thorough assessment of building B1 roof void could not be undertaken. As a result, a precautionary approach to surveying for bats and subsequent mitigation has been adopted to account for the restricted assessment.

3.6.4 This report includes a preliminary assessment of likely impacts of a development project only. The primary audience for a PEA is the client or developer and relevant members of the project team, such as the architect, planning consultant, and landscape architect. It is normally produced to inform a developer (or other client), and their design team, about the key ecological constraints and opportunities associated with a project, possible mitigation requirements and any detailed further surveys required. Under normal circumstances, it is not considered appropriate to submit a PEA in support of a planning application because the scope of a PEA is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species. In most cases, particularly when further surveys have been recommended within the PEA, a more detailed and comprehensive Ecological Impact Assessment (EcIA) should be submitted in support of a planning application instead.

3.6.5 This document has been prepared for the stated proposal (2.3.1) and should not be relied upon or used for any other project without an additional check being carried out by the author as to its suitability in relation to any updated proposals. PJC Consultancy accepts no responsibility or liability for the consequence of this document being used for a purpose other than the purposes for which it was commissioned. PJC Consultancy accepts no responsibility or liability for this document to any party other than the person by whom it was commissioned.

4 RESULTS

4.1 Desk Study

Statutory Designated Sites

4.1.1 Two statutory designated sites of nature conservation importance were identified within the zone of influence as part of the desk study. Namely Halling to Trottiscliffe Escarpment SSSI, situated approximately 850m south of the Site at the nearest point, and North Kent Woods and Downs National Nature Reserve (NNR), located approximately 680m south of the Site at the nearest point.

4.1.2 Halling to Trottiscliffe Escarpment SSSI is primarily designated for being representative of chalk grassland in west Kent and beech woodland on the chalk. Outstanding assemblages of plants and invertebrates are present. A mosaic of habitats is present at this site with areas of grassland, scrub and various types of woodland. This range of food-plants are ideal for insects and the area is of great entomological importance. It is the only known location in Britain for the moth *Hypercallia citrinalis* and several other very scarce moths, beetles and grasshoppers also occur. Some of the scrub is of entomological interest; there is an uncommon bug *Psylla viburni* which feeds on wayfaring tree for example. Associated with it is stinking iris *Iris foetidissima* and several very scarce species such as lady orchid *Orchis purpurea* and stinking hellebore *Helleborus foetidus*. The ground flora of the plateau woodland is quite different with bluebells *Hyacinthoides non-scripta* most abundant. The site supports a wide variety of birds with each of the habitats having its own characteristic community. Of greatest interest perhaps are the woodland birds; all three species of woodpecker breed here as do nuthatch and other hole-nesting species. Hawfinch is present at a higher density than in most other parts of Kent.

Non-Statutory Designated Sites

4.1.3 No non-statutory designated sites of nature conservation importance were identified within the zone of influence as part of the desk study.

Protected and Notable Habitats

4.1.4 Multiple parcels of ancient woodland listed on the ancient woodland inventory were identified within the zone of influence as part of the desk study, the nearest being Upper Down Woodl/Lower Down Wood located approximately 90m south-west of the Site.

4.1.5 Multiple parcels of HPI listed on the priority habitat inventory were identified within the zone of influence as part of the desk study. These habitats included predominantly broadly classified deciduous woodland, lowland calcareous grassland, and traditional orchard.

4.1.6 The closest parcel of HPI was an area of broadly classified deciduous woodland located approximately 65m south-east of the Site.

Protected and Notable Species

4.1.7 No EPSM licences granted in relation to protected species were identified within the zone of influence as part of the desk study.

4.2 Ecological Walkover Survey

4.2.1 Habitat types and descriptions and associated primary and secondary codes are provided in Table 6 below in accordance with UK Habitat Classification 2.0. The distribution of these habitats are presented in Appendix III, together with Site photographs, which are presented in Appendix IV.

Table 6: Habitat types present within the Site.

Habitat Type	Description

Level 2	Level 3	Level 4	Secondary Codes	
Urban (u)	Built-up areas and gardens (u1)	Developed land; sealed surface (u1b)	Garden (827)	The Site comprised a detached house (B1 and B1a), a stable block, and a barn (B2 & B3). A full description of the buildings is presented in Table 6 below. A hardstanding driveway and patio area comprised of paving slabs was also recorded within the Site.
		N/A	Vegetated garden (828)	The gardens comprised lawn, shrub and flower beds, groups of small fruiting trees, and multiple mature stands of non-native ornamental species, primarily *Rhododendron* sp. and cherry laurel *Prunus laureocerasus*
		Artificial unvegetated surface (u1c)		An equine sand school was recorded south of the stables and barn.
Grassland (g)	Modified grassland (g4)	N/A	Frequently mown (108) Vegetated garden (828)	A large area of the western section of the Site comprised modified grassland, outside of the main residential curtilage, and surrounding the sand school. The grassland, for the most part, exhibited a short and uniform sward (< 5cm) due to a regular mowing regime. Species recorded included primarily grasses such as perennial rye-grass *Lollium perenne,* as well as dandelion *Taraxacum officinale,* yarrow *Achillea millefolium*, daisy *Bellis perennis*, cut-leaved Cranes-bill *Geranium dissectum*, creeping buttercup *Ranunculus repens*, plantain *Plantago* spp., and clover *Trifolium* spp.
	Neutral grassland (g3)	Other neutral grassland (g3c)		The eastern portion of the Site comprised other neutral grassland for the majority, bordered by scrub and hedgerows. The grassland presented a shorter sward centrally (approximately 10cm), owing to the grazing horses, and longer sward towards the margins (over 30-45cm in places). Species within the sward included (but was not limited to) common bent *Agrostis capillaris*, false oat-grass *Arrhenatherum elatius*, Yorkshire-fog *Holcus lanatus*, perennial rye-grass *Lolium perenne*, crested dog's-tail *Cynosurus cristatus*, rough meadow-grass *Poa trivialis* and cock's-foot *Dactylis glomerata,* as well as yarrow,

				ribwort plantain *Plantago lanceolata*, creeping thistle *Cirsium arvense*, white clover *Trifolium repens*, red clover *Trifolium pratense*, meadow buttercup *Ranunculus acris*, common nettle *Urtica dioica*, hogweed *Heracleum sphondylium,* thyme-leaved speedwell *Veronica serpyllifolia,* bugle *Ajuga reptans*
			Scattered trees (32)	Dozens of mature and semi-mature, scattered trees were recorded within the Site, within tree lines, hedgerow, scrub, and the gardens. Tree species recorded included Scot's pine *Pinus sylvestris*, larch *Larix decidua*, hawthorn *Crategus monogyna*, weeping willow *Salix babylonica*, plum *Prunus domestica*, beech *Fagus sylvatica*, hazel *Corylus avellana*, holly *Ilex aquifolium*, hornbeam *Carpinus betulus*, oak *Quercus robur*, yew *Taxus baccata*, ash *Fraxinus excelsior*, cherry *Prunus avium*, apple *Malus domestica*, field maple *Acer campestre,* lime *Citrus x latifolia*, and Norway maple *Acer platanoides*.
Heathland and shrub (h)	Hedgerows (h2)	Native hedgerow (h2a)		Two species-rich native hedgerows comprising were recorded around the Site margins. H71 comprised hawthorn, blackthorn, elder, ash, and hazel and H78 comprised hawthorn, elder, ash, hazel, and holly.
		Non-native and ornamental hedgerow (h2b)	Active management (516)	Hedgerow comprising non-native woody species were recorded within the Site. H52 comprised Monterey cypress, H50 comprised bay and cherry laurel, and H46 comprised Leyland cypress.
	Dense scrub (h3)	Bramble scrub (h3d)		Bramble scrub understorey was recorded around the margins of the eastern portion of the Site, from the hedgerows and mixed scrub parcels, growing low and branching out into the grassland.
		Mixed scrub (h3h)		Two main large areas of mixed scrub were recorded predominantly along the northern and southern boundaries of the Site. These were SG36 comprising cherry laurel, elder, hawthorn, and holly, and SG34 comprising cherry laurel, holly, and hornbeam.

4.3 Daytime Bat Walkover Survey

4.3.1 A description of the buildings and trees and any potential roosting features (PRF) are detailed in Tables 7 and 8 below:

Table 7: DWB results of buildings within the Site.

B1 and B1a – Main house, extensions, and garage (connected)
External Description
Building B1 comprised a three-storey residential house built in 1902, the third storey comprising a converted loft space. The building was comprised of brick-and-mortar in good condition, and this was rendered and painted on the upper levels, concentrated on the gable ends of the building, which was also in good condition. The building supported a complex multi-pitched roof, comprised of red clay tiles in overall good-moderate condition, with multiple lifted, missing and damaged tiles present on all elevations. The building supported three brick-and-mortar chimney stacks, all in good condition, though with some lifted lead flashing at the bases. The eastern elevation supported a flat roof dormer in good condition. The gable ends supported a wide timber soffit at the eaves, which was not flush at the apex under the roof pitch. The eastern elevation supported a bay window with a hipped roof comprised of red clay tiles, some of which were lifted, missing and damaged. The northern elevation presented multiple pitched roofs with timber soffits with gaps between both the timber boards and the wall. The building supported original feature windows for the most part, which were in good condition and well-sealed. Multiple chimneys were recorded, with lead flashing lifted at the base in places, though it was not possible to view all the roof from the ground. Lead flashing under windows also appeared lifted in many places, on all elevations. **Building B1a** comprised a two-storey building with a garage and annex that had been joined to the main house via a single storey extension, linking the two buildings. B1a was comprised of brick-and-mortar in good condition, and this was rendered and painted on the upper levels. The building supported a multi-pitched roof, comprised of red clay tiles in overall good condition, but with multiple lifted, missing and damaged tiles present on all elevations. The building supported closed eaves, though gaps were present along the northern elevation where they were not flush to the wall.
Evidence of Bats
None recorded at the time of the assessment.
Potential Roost Features
Multiple lifted, missing and damaged red clay roof tiles, gaps between the soffits and walls, gaps at the eaves, lifted lead flashing around chimneys and windows, were all considered to provide suitable roosting features for a number of both crevice dwelling and free hanging bat species.
Suitability to Support Roosting Bats
High.
B2 - Stables
External Description

A single storey stable building with multiple compartments, the building was comprised of painted and rendered brick walls in good condition, as well as timber stable doors on the western elevation. The building supported a shallow pitched roof comprising red clay tiles, in good condition though with a few lifted tiles present.

Internal Description

The roof was supported by a timber frame structure in good condition, and was accessible through open stable doors. The roof and walls were unlined, exposing the timber sarking that the tiles were fixed to and the painted render walls. The building measures approximately 4m floor to apex.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

Lifted red clay roof tiles and the internal timber frame were considered to provide suitable roosting features for both crevice dwelling and free hanging bat species.

Suitability to Support Roosting Bats

Low.

B3 - Barn

External Description

Internal Description

An agricultural barn comprised of a mix of corrugated metal, plastic, and composite material sheeting on all elevations in good condition. The barn supported a shallow pitched roof comprised of corrugated metal sheeting in good condition. The access in to the barn was situated at the northern elevation and supported a dense growth of ivy.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

None recorded at the time of the assessment.

Suitability to Support Roosting Bats

Negligible.

Table 8: DWB results of trees within or immediately adjacent the Site. All trees have been labelled in accordance with the Tree Survey Schedule (PJC Consultancy, 2026) and Tree Constraints Plan (PJC Consultancy, 2026).

T49
Description
A mature ash approximately 19m in height, and 90cm DBH.
Evidence of Bats
None recorded at the time of the assessment.
Potential Roost Features
Multiple rot holes were recorded at between approximately 3m and 6m on various aspects of the main trunk and primary limbs which were considered to potentially lead to cavities suitable for roosting bats.
Suitability to Support Roosting Bats
PRF-M
T9
Description
A very large (approximately 121cm DBH), mature beech tree, approximately 19m high.
Evidence of Bats
None recorded at the time of the assessment.
Potential Roost Features
Suitability to Support Roosting Bats
PRF-I
T32
Description
A pedunculate oak approximately 15m high (approximately 64cm DBH)

Evidence of Bats
None recorded at the time of the assessment.
Potential Roost Features
Rot holes were recorded on a secondary limb on the northern aspect.
Suitability to Support Roosting Bats
PRF-I

4.4 Dormouse Habitat Quality Assessment

4.4.1 A number of woody species were recorded throughout the Site that are considered suitable for dormice including hawthorn, blackthorn, hazel, oak, elder, yew, beech, ash, hornbeam, field maple, and willow, as well as thorny species such as bramble and dogrose. Overall, the species diversity of semi-natural habitat present within the Site was classified as high suitability for dormice.

4.4.2 The semi-natural habitat within the Site, particularly the margins of the western and southern sections of the Site, comprised scrub, hedgerows, and scattered trees, which supported distinct and well-connected canopy, understorey and scrub layers. On this basis, the structural complexity of the habitat present within the Site was classified as medium suitability for dormice.

4.4.3 Combining both these habitat quality indices the habitat on Site was overall classified as having good suitability for dormice.

4.5 Barn Owl Assessment

4.5.1 No barn owls or evidence of barn owl occupation within the buildings and trees were identified during the barn owl assessment. In addition, the buildings provided limited features with potential to support nesting barn owls, whilst there was what appeared to be an old nesting box, this had lost the front side, was completely open, and was not large enough to be considered useful as a nesting ledge. However, the surrounding habitat was considered to provide good foraging habitat for barn owls.

5 DISCUSSION AND RECOMMENDATIONS

5.1 Statutory Designated Sites

5.1.1 Two statutory designated sites of nature conservation importance were identified within the zone of influence as part of the desk study. Namely Halling to Trottiscliffe Escarpment SSSI, situated approximately 850m south of the Site at the nearest point, and North Kent Woods and Downs National Nature Reserve (NNR), located approximately 680m south of the Site at the nearest point.

5.1.2 However, given the distance between the Site and the identified statutory designated sites, and the size of the Site and nature of the proposed development, adverse effects upon the statutory designated sites and their qualifying criteria for designation are not considered likely. Statutory designated sites are therefore not considered an ecological constraint and are not considered further in this report.

5.1.3 The Site is located within an impact risk zone for Halling to Trottiscliffe Escarpment SSSI. However, the proposed development does not fall into the listed development categories.

5.2 Non-Statutory Designated Sites

5.2.1 No non-statutory designated sites of nature conservation importance were identified within the zone of influence as part of the desk study. On this basis, no adverse impacts are anticipated on non-statutory designated sites and their qualifying criteria for designation as a result of the proposed development and are therefore not considered an ecological constraint and are not considered further in this report.

5.3 Protected and Notable Habitats

Woodland

5.3.1 Multiple parcels of ancient woodland listed on the ancient woodland inventory were identified within the zone of influence as part of the desk study, the nearest being Upper Down Woodl/Lower Down Wood located approximately 90m south-west of the Site.

5.3.2 Multiple parcels of HPI listed on the priority habitat inventory were identified within the zone of influence as part of the desk study. The closest parcel of which was an area of broadly classified deciduous woodland located approximately 65m south-east of the Site.

5.3.3 Given that the woodland HPI is anticipated to be retained in its entirety throughout the proposed development, (given it is located outside of the Site boundary) direct adverse impacts such as habitat loss and fragmentation are considered highly unlikely.

5.3.4 However, to prevent indirect adverse effects on the woodland HPI due to dust and particulate pollution, run-off, and light pollution the mitigation measures outlined below should be adhered to throughout all phases of the proposed development.

5.3.5 In order to mitigate for any indirect adverse impacts to the woodland HPI, a strict pollution prevention protocol should be adhered to during the construction phase of the proposed development to ensure that dust and particulate pollution does not indirectly adversely impact the habitats within the woodland HPI.

5.3.6 General construction environmental best practice measures such as construction work avoided during periods of high winds, and the dampening of work sites and haul routes, should be implemented to minimise the spread of dust to the HPI woodland. Furthermore, construction works should take place during periods of low rainfall and predicted dry weather, to reduce chemical runoff from the Site.

5.3.7 Other best practice construction measures which must be adhered to during the construction work of the proposed development include:

- Appropriate covering of skips and vehicles;
- Avoidance of burning of materials on Site; and
- Ensuring the correct disposal of litter from all Site contractors.

5.3.8 Furthermore, the mitigation measures in relation to lighting, as outlined in paragraph 5.4.18 below, should be adhered to throughout all phases of the proposed development.

Hedgerows

5.3.9 Multiple hedgerows recorded within the Site (H43, H71, and H78) consist predominantly (i.e. 80% or more cover) of at least one woody UK native species and therefore qualify as an HPI under the NERC Act 2006. In addition, the hedgerows were considered likely to be classified as 'important' under the Hedgerow Regulations 1997 as the hedgerows have likely been in existence for 30 years or more and potentially meet other wildlife and landscape criteria as set out in Part II of Schedule 1 of the Hedgerow Regulations.

5.3.10 Therefore, the presence of the hedgerow HPI on Site is a material consideration in the planning process.

5.3.11 The full extent of the proposed development was unknown at the time of writing this report. However, it is understood the proposed development will include the retention of all hedgerows throughout all phases.

5.3.12 It is therefore recommended that the proposals be updated to ensure a no construction buffer zone (including storage of materials and vehicle access) from the edge of the hedgerows to the boundary of the proposed development footprint, to ensure no adverse impacts on the hedgerows arise. The buffer zone should be informed by the arboricultural assessment to ensure the proposed development does not encroach within the root protection area (RPA) of the hedgerow. It is also recommended that exclusion fencing, in the form of Heras fencing, be installed to ensure that the no construction buffer zone is not disturbed or encroached upon during the demolition or construction phases of the proposed development. The fencing should then be upgraded to timber post and rail fencing post construction to maintain the buffer zone.

5.3.13 It is also recommended that a strict pollution prevention protocol, as detailed above, be implemented throughout the construction and operational phases of the proposed development, to ensure that dust and particulate pollution of all retained hedgerows and wider surroundings is avoided.

5.3.14 Providing general construction environmental best practice measures are implemented, adverse effects upon the parcel of hedgerow HPI are not considered likely.

5.3.15 In the event that the proposed development requires the removal of hedgerow, even small sections, for example for enabling pedestrian and vehicle access, then further hedgerow surveys are recommended to ascertain whether the hedgerows qualify as 'important hedgerows' under the Hedgerow Regulations 1997.

5.3.16 It should be noted that under the Hedgerow Regulations 1997 it is an offence to remove a hedgerow without applying to the local planning authority (LPA) for permission. Should the hedgerow qualify as 'Important' under the Hedgerow Regulations 1997 the LPA must decide whether the reasons for removal justify the loss of an 'Important Hedgerow', with a presumption for retention.

5.4 Protected and Notable Species

5.4.1 The Site was considered to provide opportunities for protected and notable species. The suitability of habitat on Site to support species is considered below.

Bats

5.4.2 All bats are European protected species (EPS) and both individual animals and their roosts are afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended)

and the Wildlife and Countryside Act, 1981 (as amended). Certain bat species are also listed as Species of Principal Importance (SPI) under the NERC Act 2006.

Roosting Suitability Buildings

5.4.3 As part of the DBW, buildings B1, B1a, and B2 were identified as exhibiting features i.e. lifted, damaged or missing tiles with potential to support roosting bats.

5.4.4 On this basis, building B1 was identified as having high suitability to support roosting bats during the summer, and building B2 was identified as having low suitability to support roosting bats during the summer.

5.4.5 Therefore, further emergencesurveys are required to determine presence or likely absence of bat roosts within buildings B1, B1a, and B2 to determine any subsequent requirements for mitigation, compensation and/or licences to facilitate the proposed development. All bat emergence surveys should be undertaken between May and September inclusive. A minimum of a three-week interim period must be allowed between each survey visit.

5.4.6 Buildings B1 and B1a were identified as having high suitability to support roosting bats. It is therefore recommended that three dusk emergence surveys be undertaken. Building B2 was identified as having low suitability to support roosting bats. It is therefore recommended that a single dusk emergence survey be undertaken.

5.4.7 It should be noted that should a bat roost or roosts be found in building B2, additional surveys totalling three emergence surveys will be required to be undertaken, to determine any subsequent requirements for mitigation, compensation and/or licences to facilitate the proposed development

5.4.8 It should also be noted that should a bat roost or roosts be found, an EPSM licence may be required to permit works that would potentially cause destruction. An EPSM licence for development is issued by Natural England under Regulation 53(2)(e) of The Conservation of Habitats and Species Regulations (2017). This application process can a minimum of six weeks.

5.4.9 In addition to summer roosting suitability, buildings B1 and B1a were also identified as having low suitability to support hibernating roosting bats, notably under the tiles.

5.4.10 However, it is not considered appropriate nor efficient to undertake a systematic hibernation assessment of building B1 and B1a. Given the inefficiencies of a systematic search of the entire building, hibernation surveys of buildings B1 and B1a are not considered practical on this occasion. Furthermore, given the size and structure of building B1 and B1a, any automated/static surveys for winter activity would likely record calls from bats flying over the property which would provide inaccurate results.

5.4.11 Therefore, it is recommended that any demolition of buildings B1 and B1a be undertaken outside of the core hibernation period (outside of November to March inclusive). In addition, and to account for the potential loss of a, likely small, hibernation roost, at least one hibernation bat box (Schwegler 1WQ Summer and Winter Bat Roost or similar) shall be installed on to newly constructed buildings.

Roosting Suitability Trees

5.4.12 As part of the DBW survey, trees T9, T32, and T49 were identified as supporting potential roosting features (PRF). Overall, tree T49 supported PRFs categorised as PRF-M suitability and trees T9 and T32 supported PRFs categorised as PRF-I suitability.

5.4.13 In the event that any of these trees are proposed to be felled to facilitate development proposals, felling works could result in the damage or destruction of a potential bat roost site. However, it anticipated that trees T9, T32, and T49 within the Site, are to be retained throughout all phases of the proposed development.

5.4.14 Therefore, direct impacts to any potential bat roosts within these trees is not considered likely, and further surveys for roosting bats in trees are no considered proportionate.

5.4.15 However, indirect impacts, such as from light spill and pollution are considered likely unless the mitigation outlined below

5.4.16 It should be noted that the DBW was undertaken from the ground and therefore it was not possible to accurately determine the characteristics of the feature, for example the depth of the feature within the tree. The above classification therefore follows a precautionary approach using professional judgement.

Foraging and Commuting Suitability

5.4.17 The Site was considered to provide suitable commuting and foraging habitat for bats primarily the scrub, hedgerows, treelines, and scattered trees, and was classified as having moderate suitability to support foraging and commuting bats.

5.4.18 However, these features are anticipated to be retained for the vast majority of the Site. On this basis, the proposed development is considered unlikely to result in the loss or degradation of bat foraging and commuting habitat or sever important commuting routes and obstruct access between potential bat roosts and important foraging habitats, providing the mitigation measures in relation to lighting described below are implemented and strictly adhered to during the construction and operational phases of the proposed development. It is recommended that any new artificial lighting associated with the proposed development aims to:

- Create and maintain dark corridors along all retained boundary habitat;
- Use minimum light levels necessary. For example, there should be times throughout the evening (when bats are most active) when all outdoor security lights are unlit to avoid affecting bat activity. Lighting can also be installed using a timer or movement sensor to avoid long periods of an area being lit at night;
- Lighting should be a warm white spectrum and feature peak wavelengths higher than 550nm to lower the range of species affected by lighting. Using LED luminaires where possible and avoid luminaires with UV elements, specifically avoiding metal halide and fluorescent sources (Institute of Lighting Professionals, 2023); and
- Internal luminaries can be recessed where installed in proximity to windows to reduce glare (Institute of Lighting Professionals, 2023) and light spill and use hoods, louvres or other similar design features to avoid light spill and direct light away from areas of mature vegetation.

Hazel Dormice

5.4.19 Hazel dormice *Muscardinus avellanarius* are EPS and are afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act, 1981 (as amended). Dormice are also listed as SPI under the NERC Act 2006.

5.4.20 A number of woody species were recorded throughout the Site that are considered suitable for dormice including hawthorn, blackthorn, hazel, oak, elder, yew, beech, ash, hornbeam, field maple, and willow, as well as thorny species such as bramble and dogrose. Overall, the species diversity of semi-natural habitat present within the Site was classified as high suitability for dormice.

5.4.21 The semi-natural habitat within the Site, particularly the margins of the western and southern sections of the Site, comprised scrub, hedgerows, and scattered trees, which supported distinct and well-connected canopy, understorey and scrub layers. On this basis, the structural complexity of the habitat present within the Site was classified as medium suitability for dormice.

5.4.22 Combining both these habitat quality indices the habitat on Site was overall classified as having good suitability for dormice.

5.4.23 However, these features are anticipated to be retained for the vast majority of the Site.

5.4.24 Taking both plant diversity and structural complexity into consideration, the marginal vegetation of the Site was assessed as being 'good' quality for dormice providing sheltering, commuting, and

foraging opportunities. In addition, suitable semi-natural habitat connectivity also existed between the Site and other habitats, including woodland within the immediate and wider landscape.

5.4.25 Therefore, in the event that dormice are present within the Site and wider surroundings, the proposed development could result in the death or injury, or disturbance to dormice, or could result in the damage or destruction of a dormouse breeding site or resting place.

5.4.26 The vast majority of suitable dormouse habitat (namely the liner belts of dense scrub around the field boundaries) are anticipated to be retained as part of the proposed development. However, a small volume of scrub (only very low growing bramble scrub at the outer edges of denser more mature scrub), and isolated hedgerow (H43), are proposed to be removed in order to allow for residential gardens within the eastern aspect of the Site.

5.4.27 Given that the section of scrub proposed to be removed is anticipated to be only very low growing bramble scrub at the outer edges of denser more mature scrub, and that the hedgerows proposed to be removed are not considered to be arboreally connected to any other habitat within the Site or wider environment, further dormouse surveys are not considered necessary, *providing the following avoidance, mitigation and compensation measures outlined below are strictly adhered to*.

5.4.28 In the first instance, and following the mitigation hierarchy, every effort must be made to retain as much of the scrub as possible, including changing the design proposals to reduce the size of the proposed residential gardens, therefore avoiding the removal or fragmentation of suitable dormouse habitat.

5.4.29 In the first instance the habitats on Site should be maintained in their present condition, bramble is notoriously fast growing and if the scrub habitat is allowed to recolonise (over one growing season) then further habitat assessment would be needed by a qualified ecologist to establish their suitability for dormice. In the event that the habitat becomes suitable then further dormice surveys would be required to determine dormouse presence/likely absence across the Site. The results of the surveys will determine any subsequent requirements for mitigation, compensation and/or licences to facilitate the proposed development.

5.4.30 In the event that dormice are present within the Site and wider surroundings, the proposed development could result in the death or injury, or disturbance to dormice or could result in the damage or destruction of a dormouse breeding site or resting place.

5.4.31 However, based on best practise guidelines (The Mammal Society, 2025) which recommend when development impacts have a low risk of an offence taking place (i.e. only very low growing bramble scrub at the outer edges of denser more mature scrub is proposed to the cleared), ecologists should make a professional judgement based on a variety of factors. A key factor is if the vegetation can be effectively checked to confirm the absence of dormice or nests, alongside the timings and methods of the site clearance.

5.4.32 With the assumption that suitable dormouse habitat clearance is restricted to very low growing bramble scrub at the outer edges of denser more mature scrub, and the isolated hedgerows centrally within the Site which are no arboreally connected, clearance should be completed under a Precautionary Non-Licensed Method Statement for dormice. This is to avoid direct impacts resulting in the death or injury, or disturbance to dormice or the damage or destruction of a dormouse breeding site or resting place.

5.4.33 This is further supported by guidance detailed by Natural England. For European protected species (such as dormice) Natural England's stance is that: "If the consultant ecologist, on the basis of survey information and specialist knowledge of the species concerned, considers that on balance the proposed activity is reasonably unlikely to result in an offence under Regulation 41 or 45, then no licence is required" (Natural England, 2013).

Great Crested Newts and other Amphibians

5.4.34 Great crested newts (GCN) *Triturus cristatus* are EPS and are afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act, 1981 (as amended). GCN and common toad *Bufo bufo* are also listed as SPI under the NERC Act 2006.

5.4.35 No waterbodies were identified within the Site or within a 250m radius of the Site as part of the desk study. On this basis, the Site was considered to provide negligible breeding opportunities for breeding GCN. The Site supported scrub, hedgerows, grassland, and vegetated garden, which provided some foraging and commuting opportunities for GCN during their terrestrial lifecycle phase.

5.4.36 Given the absence of suitable waterbodies for breeding GCN within the Site, and that no suitable waterbodies were recorded within 250m radius of the Site, the proposed development is considered highly unlikely to result in the death or injury, or disturbance to GCN or result in the damage or destruction of a GCN breeding site or resting place.

5.4.37 This is supported by the rapid risk assessment tool within the GCN licence application form (WML-A14-2), which was used to assess the risk of the proposed development on GCN. Based on the current proposal that comprises no suitable terrestrial habitat loss within 250m of any potential GCN breeding waterbodies, the tool indicates a 'green' risk meaning the risk of an offence being committed is considered to be highly unlikely and that a European Protected Species (EPS) licence is not required.

5.4.38 However, as a precaution, it is recommended that construction works (including habitat clearance works) be undertaken in accordance with a Precautionary Non-Licensed Method Statement (see Appendix V).

5.4.39 The purpose of the Precautionary Non-Licensed Method Statement is to detail all reasonable avoidance and mitigation measures to be implemented to ensure that there are no detrimental impacts on the favourable conservation status of GCN and no risk to individual GCN potentially present within the Site as a result of construction activities.

5.4.40 Providing the avoidance and mitigation measures detailed within the Precautionary Non-Licensed Method Statement are implemented in full, the proposed works are considered highly unlikely to adversely affect the favourable conservation status of GCN, or breach relevant nature conservation legislation pertaining to GCN. On this basis, further GCN presence/likely absence surveys and/or a EPSL is not required prior to proposed works commencing.

Reptiles

5.4.41 Native, widespread reptile species (common or viviparous lizard *Zootoca vivipara*, adder *Vipera berus*, grass snake *Natrix helvetica* and slow worm *Anguis fragilis*) are protected under Schedule 5 of The Wildlife and Countryside Act 1981 (as amended), making it an offence to kill or injure individual animals. All widespread reptile species are also listed as SPI under the NERC Act 2006.

5.4.42 Habitats recorded within the Site particularly scrub, hedgerows, grassland, and vegetated garden were considered to provide foraging, commuting, basking and sheltering opportunities for reptiles. The log piles (Target Note TN1) and brash piles (Target Note TN2) were also considered to provide suitable hibernation features for reptiles.

5.4.43 Works associated with any proposed development of the Site, for example habitat clearance, could therefore result in the death or injury of any reptiles present within the Site.

5.4.44 Therefore, further reptile presence/likely absence surveys are required to determine reptile presence/likely absence, reptile species diversity and population sizes. The results of the surveys will determine any subsequent requirements for mitigation and compensation to facilitate the proposed development.

5.4.45 Reptile presence/likely absence surveys should be undertaken in accordance with best practice survey standards (Froglife, 1999). It is therefore recommended that a minimum of seven survey visits be undertaken to check artificial refugia and natural refugia present for presence of reptiles. Survey visits

should be spread out over the active reptile season between April and September inclusive during periods of dry, warm weather with daytime air temperatures between 9-18°C.

5.4.46 The findings of the reptile presence/likely absence survey and any subsequent requirements for mitigation and compensation to facilitate the proposed development should be presented within a stand-alone (phase 2) report or EcIA.

Birds

5.4.47 All birds, their nests and eggs are protected from killing and injury of individuals, damage and destruction of nests and destruction of eggs under the Wildlife and Countryside Act 1981 (as amended). Species listed in Schedule 1 (Part 1) of the Act are also protected from disturbance whilst nesting or whilst with dependent young, by special penalties. Many bird species are also listed as SPI under the NERC Act 2006.

5.4.48 The Site supported scrub, trees, buildings, hand hedgerow, all of which were considered to provide good nesting and foraging opportunities to a wide range of common bird species. Although unlikely, a number of bird species listed on Schedule 1 of the Wildlife and Countryside Act could potentially use the Site for nesting.

5.4.49 Works associated with any proposed development of the Site, for example habitat clearance, could therefore result in direct adverse impacts on nesting birds. On this basis, nesting birds are therefore considered a potential ecological constraint. In order to comply with legislation protecting nesting birds the mitigation measures detailed below should be adhered to.

5.4.50 It is recommended that habitat clearance works be undertaken outside the main nesting bird season. The nesting bird season for most British bird species is between March and August (inclusive).

5.4.51 Should this not be possible, all suitable nesting habitat, including buildings, must be inspected by an ecologist to determine the presence/absence of any nesting birds prior to clearance. In the event of an active nest being identified, a temporary exclusion zone would need to be placed around the nest and development paused until the dependent young have fledged which may be several weeks. The ecologist will determine safe working distances and the distances will be dependent upon the bird species present.

5.4.52 Please note that as feral pigeons *Columba livia* domestica nest all year round, the destruction of their nests may not be avoidable. Where applicable, a licence to remove an active nest for health and safety purposes may be obtained from Natural England subject to conditions.

5.4.53 The permanent loss of suitable foraging and nesting habitat for birds should be compensated for by incorporating new suitable foraging and nesting habitat into the landscape designs. Habitat creation examples including planting a variety of native fruit and nut bearing tree and shrub species such as birch *Betula* spp., holly *Ilex aquifolium*, rowan *Sorbus aucuparia*, elder *Sambucus nigra* and crab apple *Malus sylvestris*.

5.4.54 Artificial bird nest boxes should also be installed onto any retained trees and new buildings within the Site. Given their designation as SPI, particular consideration should be given to the installation of starling *Sturnus vulgaris* (i.e. Schwegler 3S or similar) nest boxes and/or general bird nest boxes used by house sparrow *Passer domesticus* and spotted flycatcher *Muscicapa striata* (i.e. Schwegler 1B, 2HW, 2GR or similar).

Badgers

5.4.55 Badgers *Meles meles* and their setts are protected under The Badger Act (1992).

5.4.56 Some limited evidence of badger field signs including a mammal path and mammal push throughs were recorded within the Site, predominantly the eastern portion of the Site. However, other field signs, for example hairs, snuffle holes, latrines, dung pits, scratching posts or setts were not recorded within the Site during the survey.

5.4.57 Habitats throughout the Site were considered to provide limited sett building opportunities for badgers given the flat topography and exposed nature of much of the Site. However, habitats throughout the Site were considered to provide good foraging and commuting opportunities for badgers, given the scrub, hedgerows, scattered trees, and grassland present, with connectivity to woodlands parcels in the wider environment.

5.4.58 Given the absence of setts within the Site boundary the proposed development is considered unlikely to result in the damage or destruction of a sett, or obstructing access to a sett, and disturbance to a badger whilst it is occupying a sett.

5.4.59 However, given the suitable foraging and commuting habitat within the immediate Site and due to the mobile nature of the species and its ability to quickly establish new setts, badgers are still considered a potential ecological constraint to the proposed development.

5.4.60 As a precautionary approach it is recommended that a pre-works check be undertaken immediately prior to the proposed development becoming operational to ensure no new setts have become established.

5.4.61 It should be noted that in the event that a mammal hole is identified, further surveys (with the use of trail cameras), mitigation, compensation and licencing requirements may be considered necessary to facilitate the proposed development.

5.4.62 During construction works, all excavations should be excavated individually and back filled immediately after where possible. Where this is not possible excavations must be covered to prevent badgers (or other animals) becoming trapped within the excavation. If this is not possible, one or both sides of the excavation must be sloped in order to allow egress from the excavation.

5.4.63 In addition, all chemicals onsite should be stored correctly and be made inaccessible to badgers, and other animals, (i.e. kept in a secure lock up or on pallets off of the ground).

Riparian Mammals

5.4.64 Water voles *Arvicola amphibious* and their places of shelter are protected under the Wildlife and Countryside Act, 1981 (as amended) which makes it an offence to kill, injure or take any water vole, damage, destroy or obstruct access to any place of shelter or protection that the animals are using, or disturb voles while they are using such a place. Water voles are also listed as SPI under the NERC Act 2006.

5.4.65 Otters *Lutra lutra* are protected under the Conservation of Habitats and Species Regulations (2017) as amended and under the Wildlife and Countryside Act, 1981 (as amended) which makes it an offence to kill, injure or capture an otter, intentionally or recklessly disturb otters; or to damage, destroy or intentionally or recklessly obstruct access to a holt or other resting places. Otters are also listed as SPI under the NERC Act 2006.

5.4.66 Eurasian beavers *Castor fiber* are protected under the Conservation of Habitats and Species Regulations (2017) as amended and under the Wildlife and Countryside Act, 1981 (as amended) which makes it an offence to kill, injure or capture a beaver, deliberately disturb beavers; or to damage or destroy the breeding site or resting place of a beaver.

5.4.67 No aquatic and very limited suitable terrestrial habitat was recorded within the Site and immediate surroundings.

5.4.68 On this basis, the Site was identified as having negligible potential to support water voles, otters, and beavers and are therefore not considered an ecological constraint and are not considered further in this report.

European Hedgehog

5.4.69 The European hedgehog *Erinaceus europaeus* is classified as an SPI under the NERC Act 2006. Therefore, the presence of this species on site would be a material consideration in the planning process.

5.4.70 The Site supported some suitable semi-natural habitat for hedgehogs. However, the proposed development is considered unlikely to result in impacts on European hedgehogs given the size and nature of the Site and presence of other suitable habitat within the wider surroundings and providing mitigation measures detailed below are adhered to.

5.4.71 Hedgehogs should be specifically watched for during the removal of features considered to provide potential sheltering habitat (i.e. dense scrub and brash piles). If any hedgehogs are found, they should be carefully moved to retained areas of vegetation outside of the Site.

5.4.72 Furthermore, any new boundaries required as part of the proposed development should be permeable to hedgehogs in order to main habitat connectivity across the Site and wider surroundings. This can be achieved by creating ground-level boundary holes (approximately 13cm x 13cm) which should link as many neighbouring land parcels as possible.

5.4.73 In addition, parcels of dense scrub, shrubs and tussocky grassland and features such as deadwood and brash piles should be maintained and/or created across the Site in order to provide important foraging and nesting opportunities for hedgehogs.

Rabbits and Foxes

5.4.74 Rabbits *Oryctolagus cuniculus* and foxes *Vulpes vulpes* are protected under the Wild Mammals (Protection) Act 1996 which makes it an offence to crush or asphyxiate or inflict unnecessary suffering to any and all wild mammals.

5.4.75 It should be noted that evidence of rabbits and red foxes in the form of rabbit droppings, mammal push throughs and a fox observed on the day of the Site visit, were recorded within the eastern portion of the Site during the habitat survey.

5.4.76 Therefore, it is recommended a site walkover should be undertaken before works commence, and any identified mammal holes be sensitively deconstructed by soft-digging and supervised by a suitably qualified ecologist, to ensure than no offence will be committed.

Invertebrates

5.4.77 A number of invertebrate species such as stag beetles *Lucanus cervus* are afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and under Schedule 5 of the Wildlife and Countryside Act, 1981 (as amended). Many invertebrate species including the stag beetle are also listed as SPI under the NERC Act 2006.

5.4.78 The Site supported a mosaic of suitable semi-natural habitats for protected and notable invertebrates, most notably stag beetles, in the form of deadwood, scrub, and orchard trees with grassland field layer (within the vegetated garden parcel).

5.4.79 Orchards in particular are known to support an array of invertebrates, including the rare noble chafer beetle *Gnorimus nobilis*, due to the multitude of micro-habitat characteristics and conditions they present including open grassland field-layer, blossom within the fruit trees, structural texture of fruit tree bark and general defects (i.e. rot holes and hollow trunks) within fruit trees, and fallen deadwood.

5.4.80 On this basis, the Site was considered to provide potentially suitable opportunities for protected and notable invertebrate species.

5.4.81 Works associated with any proposed development of the Site, for example habitat clearance, could therefore potentially result in direct impacts to protected and notable invertebrate species present within the Site.

5.4.82 Therefore, if removal of the fruit trees is proposed to facilitate the proposed development, further mitigation and compensation is required to avoid the harm of any notable and protected species.

Mitigation and compensation for stag beetles can be achieved conducting a hand search during any required removal of the trees and deadwood log piles. The hand search should be conducted by looking for any stag beetle adults and larvae. Any cherry trees removed should then be kept and translocated to a donor site that should be detailed within an appropriate landscaping plan. The landscaping plan should also contain suitable larval food sources for the other NERC species found on site such as (sweet vernal grass *Anthoxanthum adoratum*, red fescue *Festuca rubra*, native foxgloves *Digitalis* sp. and native daisy *Bellis* spp.). This should be detailed fully within a landscaping plan.

Plants

5.4.83 Wild plants are protected under the Wildlife and Countryside Act 1981 (as amended) which prohibits the unauthorised intentional uprooting of any wild plant species and forbids any picking, uprooting or destruction of plants listed on Schedule 8 of which there are over 150 species. In addition, nine plant species are afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended). Many plant species are also listed as SPI under the NERC Act 2006.

5.4.84 The habitats on Site were common and widespread and therefore provided limited potential to support protected and notable and rare plant species.

5.4.85 Section 14(1) of the Wildlife and Countryside Act 1981 (as amended) makes it illegal to plant or otherwise cause to grow in the wild any plant listed in Schedule 9 of the Act including Japanese knotweed *Fallopia japonica*.

5.4.86 A stand of Japanese knotweed was recorded near the base of tree T27 (refer to Tree Constraints Plan for exact location) along the southern Site boundary.

5.4.87 Works associated with any proposed development of the Site, for example habitat clearance, could therefore result in the spread of Japanese knotweed. On this basis, invasive plant species are therefore considered a potential ecological constraint. In order to comply with legislation regarding invasive plant species the mitigation measures detailed below should be adhered to.

5.4.88 Any works associated with the proposed development of the Site should be undertaken in accordance with a detailed invasive plant species method statement adhering to the Environment Agency Japanese Knotweed Code of Practice (Environment Agency, 2013). In addition, a specialist contractor should be employed to manage and remove Japanese knotweed from the Site in order to prevent its spread.

5.5 Ecological Enhancements

5.5.1 Under Section 40 of the NERC Act 2006 there is a duty to have regard to biodiversity conservation. In addition, the National Planning Policy Framework (2023) and the Gravesham Local Plan Core Strategy (Gravesham Borough Council, 2014) encourage ecological enhancement to be integrated into development projects in order to achieve an overall net-gain in biodiversity.

5.5.2 Furthermore, the Kent Local Nature Recovery Strategy (LNRS) provides a county-wide framework for identifying priorities and opportunities for conserving, restoring, and enhancing biodiversity, with a focus on priority habitats and species in decline, while also supporting wider objectives such as ecosystem resilience and climate adaptation. Under the Environment Act 2021, LNRSs are a statutory requirement, and public authorities must have regard to them in decision-making, including in the planning process, making them an important material consideration for development proposals. In this context, the ecological enhancement measures proposed below are where possible aligned with the Kent LNRS and targeted towards its priority species (particularly those requiring bespoke measures) as well as other threated / significant species included on the relevant species longlist, thereby contributing to halting biodiversity loss and supporting species recovery at both local and landscape scales, ensuring that site-level interventions deliver measurable ecological benefits in line with strategic conservation objectives.

5.5.3 Given the above, the following enhancement recommendations should be considered and incorporated into the final design proposals:

- Installation and maintenance of artificial bat bricks or bat tubes (i.e. Schwegler 1FR and 2FR bat tubes and Schwegler 1GS bat brick or similar) into any new buildings and installation of bat boxes (i.e. Schwegler 2FN or similar) on to suitable retained trees to increase the roosting opportunities for bats within the Site. Any artificial roosting features should be placed between 3m and 6m above ground in a variety of locations at slightly different heights and preferably positioned facing a variety of directions.
- Installation and maintenance of artificial bird nest boxes onto any retained trees and new buildings on Site to increase nesting opportunities for many bird species. Given their designation as SPI, particular consideration should be given to installing house sparrow *Passer domesticus* (i.e. Schwegler 1SP or similar) and starling *Sturnus vulgaris* (i.e. Schwegler 3S or similar) nest boxes onto any retained trees and any new buildings within the Site.
- Planting of native species rich hedgerows and/or 'natural buffer strips' along the access roads and plot boundaries. Approximately five woody plants should be planted per metre of hedgerow, in double staggered rows. The hedgerow should be managed on an annual rotation, whereby half of each hedgerow is cut in any one year. This will encourage a diverse structure to produce both a wide and dense hedgerow. Woody species planted could include the following species:
    - Oak *Quercus* sp;
    - Hazel *Corylus avellana*;
    - Hawthorn *Crategous monogyna*;
    - Blackthorn *Prunus spinosa*;
    - Field maple *Acer campestre*;
    - Holly *Ilex aquifolium*;
    - Elder *Sambucus nigra*; and
    - Crab apple *Malus sylvestris*.
- Creation of areas of species-rich meadow grassland within the Site, ideally within wide 'natural buffer strips' along the Site boundaries. These areas could provide additional foraging and shelter opportunities for a wide variety of invertebrates, reptiles, amphibians and bird and bat species. Plant species to be included within the wildflower seed mix should be appropriate for the Site and wider area. A wildflower seed mixture should be sown on the site in March, April or September. Once established, the grassland should be maintained via annual seed cutting in the autumn, following seed setting and use of pesticides, fertilizers or other chemicals, avoided.
- Incorporation of dead wood habitat piles within areas of retained suitable habitat for example underneath tree canopies and along pond margins. These are used by both invertebrates such as the stag beetle which is a SPI and by reptiles and widespread amphibians as refugia.
- Creation of a pond designed and managed for wildlife. Ponds provide valuable foraging opportunities for a wide variety of protected and notable species including amphibians and reptiles, particularly grass snakes. As general guidance, any newly created pond(s) should exhibit shallow pond margins (less than 5˚) to allow marginal vegetation to grow and should contain deeper open areas (at least 60 cm) within the centre of the pond. In addition, consideration should be given to the planting of additional marginal plant species including:
    - Branched bur reed *Sparganium erectum*;
    - Broad-leaved pondweed *Potomogeton natans*;
    - Yellow iris *Iris pseudocorus*;

- Floating sweet-grass *Glyceria fluitans*;
- Greater pond sedge *Carex riparia*;
- Marsh marigold *Caltha palustris*;
- Meadowsweet *Filipendula ulmaria*;
- Water forget-me-not *Myosotis scorpioides*;
- Water mint *Mentha aquatic*; and
- Water plantain *Alisma plantago aquatic*.

- Incorporation of a 'Bee Brick' into the new building(s). The Bee Brick should be positioned facing a southerly direction, in an area that receives a lot of light and warmth throughout the day and without vegetational obstruction to the entrances. It is recommended that for every Bee Brick installed, a minimum of 1m^2 of 'bee friendly' plant species be planted to support any solitary bees that would likely utilise the feature. The plant species could include:
  - Common yarrow *Achillea millefolium*;
  - Greater knapweed *Cantaurea scabiosa*;
  - Common foxglove *Digitalis purpurea*;
  - Hemp agrimony *Eupatorium cannabinum*;
  - Common honeysuckle *Lonicera periclymenum*;
  - Wild marjoram *Origanum vulgare*; and
  - Guelder rose *Viburnum opulus*.

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7 APPENDICES

Appendix I: Site Location Plan

LEGEND:

Red Line Boundary

STATUS: FOR INFORMATION ONLY

PJC

Bussex Office: Rocks Yard, Victoria Rd, Henfrmanceux, Hailsham, BN27 4TQ.
T: 01323-832129.

Kent Office: The Watermill, The Mill Business Park, Maidstone Road, Ashford, TN26 1AE.
T: 01233 333383
E: contact@pjcconsultancy.com
W: https://www.pjcconsultancy.com

CLIENT: [redacted]

PROJECT: Woodlands Farm
Culverstone
DA13 0RQ

TITLE: Site Location Plan

SCALE AT A4:	DRAWN:	APPROVED:
1:2,000	TK	TK
PROJECTION:	DATE:	DATE:
EPSG:27700	29/07/26	29/07/26

DRAWING No: PJC/7022E/26/A1/V1

Appendix II: Legislation and Planning Policy

Legislation

The Environment Act (2021)

The Environment Act (2021) is the UK's framework of environmental protection, post Brexit, and provides binding targets for improving air quality, water, biodiversity, and waste reduction. The Environment Act requires all development schemes in England (that are subject to Town and Country Planning Act 1990) to deliver a mandatory 10% biodiversity net gain (BNG) to be maintained for a period of at least 30 years. The concept seeks measurable improvements for biodiversity by creating or enhancing habitats in association with development. Key parts of the Environment Act 2021 which relate to BNG and its delivery are Part 6: Nature and Biodiversity and the supporting Schedule 14, particularly sections 9(3), 13(1), 14(2) and 15.

The Conservation of Habitats and Species (Amendment) Regulations 2017

The Conservation of Habitats and Species (Amendment) Regulations 2017 is the UK transposition of the European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, or the 'Habitats Directive'. The directive provides protection of key habitats and species of European importance. Those key habitats and species are listed in Annexes II and IV of the directive.

Those species protected under the regulations and most likely encountered during development include:

- All bat species
- Hazel dormouse
- Great crested newt
- Common otter

The Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the primary legislation for the protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats (the 'Bern Convention') and the European Union Directives on the Conservation of Wild Birds (79/409/EEC) and Natural Habitats and Wild Fauna and Flora (92/43/FFC) are implemented in Great Britain. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants respectively. The Countryside and Rights of Way (CRoW) Act 2000 makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site

Those species protected under the act and most likely encountered during development include:

- All bat species
- All nesting birds
- Hazel dormouse
- Great crested newt
- Common otter
- Water vole
- All native reptile species

- White-clawed crayfish

The Protection of Badgers Act 1992

The Protection of Badgers Act 1992 consolidates and strengthens previous legislation (including the Badgers (Further Protection) Act 1991). Under the act, it is an offence to:

- Wilfully kill, injure or take a badger (or attempt to do so).
- Cruelly ill-treat a badger.
- Dig for a badger.
- Intentionally or recklessly damage or destroy a badger sett, or obstruct access to it.
- Cause a dog to enter a badger sett.
- Disturb a badger when it is occupying a sett.

The Natural Environment and Rural Communities Act (NERC) 2006

Section 40 of the Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'. Section 41 of the Act provides a list of habitats and species, which are of 'principal importance for the conservation of biodiversity.' This list aids decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications.

Hedgerows Regulations 1997

These regulations were produced to protect important countryside hedges from removal. The regulations only cover hedgerows that are at least 20m long or, if shorter, connected to other hedgerows at both ends or part of a longer hedgerow. They must be in or adjacent to common land, village greens, site of special scientific interest, local nature reserves, or land used for agriculture, forestry or breeding or keeping of horses, ponies or donkeys.

Wild Mammals (Protection) Act 1996

All wild mammals are protected against intentional acts of cruelty under the above legislation. This makes it an offence 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.

This legislation is of relevance when undertaking works with potential to affect wild mammals e.g. works near burrows, warrens or dens, regardless of other legislative protection.

Species and Habitat Specific Legislation

Plants

Wild plants are protected under Section 13 of the Wildlife and Countryside Act 1981 (as amended). It prohibits the unauthorised intentional uprooting of any wild plant species and forbids any picking, uprooting or destruction of plants listed on Schedule 8 of which there are over 150.

The Conservation of Habitats and Species Regulations 2017 (as amended) have nine plants listed within Annex IV these are; creeping marshwort *Apium repens*, early gentian *Gentianella anglica*, fen orchid *Liparis loeselii*, floating-leaved water plantain *Luronium natans*, killamey fern *Trichomanes speciosum*, lady's slipper *Cypripedium calceolus*, shore dock *Rumex rupestris*, slender naiad *Najas flexilis*, and yellow marsh saxifrage *Saxifraga hirculus*. It is an offence to deliberately pick, collect cut, uproot or destroy any protected plant, or keep, transport, sell, or exchange, any live or dead such plant species, this applies to all stages of its life cycle.

Invasive Species

Schedule 9, Section 14 of the Wildlife and Countryside Act (1981, as amended) prohibits the introduction into the wild of any species that is not ordinarily resident in and is not a regular visitor to Great Britain in a wild state, or any species of the 69 plants listed on Schedule 9.

The frequently encountered invasive species within proposed development sites include floating pennywort *Hydrocotyle ranunculoides*, giant hogweed *Heracleum mantegazzianum*, Himalayan balsam *Impatiens glandulifera*, Japanese knotweed *Fallopia japonica*, New Zealand *pygmyweed Crassula helmsi*i, rhododendron *Rhododendron ponticum* and certain hybrids of the above, some species may be native yet are listed for conservation purposes.

Plant or soil material contaminated by Japanese knotweed that is to be discarded is considered to be a 'controlled waste' under the Environmental Protection Act 1990 (EPA 1990). It is an offence to deposit, treat, keep, or dispose of controlled waste without a licence. Furthermore, knotweed that has been cut down and removed must be received by an authorised person to be disposed of correctly. A licence can be obtained from the Environment Agency (EA). The release or planting of a listed species in the wild can be permitted under a licence granted by the relevant statutory body.

Invertebrates

A number of invertebrates such as silver studded blue butterfly *Plebejus argus*, stag beetles *Lucanus cervus* and white letter hairstreak *Stymondia w-album* are fully protected under Schedule 5 of the Wildlife and Countryside Act (1981, as amended). This legislation makes it illegal to intentionally kill, injure, or take a protected invertebrate, or to damage, destroy, or obstruct access to any structure or place used for shelter or protection by such a species; and disturb any protected species occupying such a structure or place.

Three invertebrates are listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017, fisher's estuarine moth *Gortyna borelii lunata*, the large blue butterfly *Maculinea arion* and lesser whirlpool ram's-horn snail *Anisus vorticulus*. It is an offence deliberately to kill, capture, or disturb a listed species, or to damage or destroy the breeding site or resting place of such an animal.

Amphibians

There are four widespread amphibian species, common frog *Rana temporaria*, common toad *Bufo bufo*, palmate newt *Lissotriton helveticus* and smooth newt *Lissotriton vulgaris*. All of the four widespread species receive partial protection under Schedule 5 of the Wildlife and Countryside Act (1981, as amended) making it an offence to offer them for sale or trade.

Great crested newts *Triturus cristatus* and natterjack toads *Epidalea calamita* are fully protected under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) of the Wildlife and Countryside Act (1981, as amended) and the Conservation of Habitats and Species Regulations 2017. Reintroduced populations of 'native' pool frogs *Pelophylax lessonae* also receive the same protection. It is illegal to possess a protected species (alive or dead), deliberately capture, injure or kill, to intentionally or recklessly disturb, or to deliberately take or destroy the eggs of these protected species. It is also illegal to damage, destroy or intentionally or recklessly obstruct access to breeding or resting place used by these protected species'. All life stages of each species' are afforded the same level of protection.

In order to undertake any activity, which would, otherwise result in any of the above offences being committed, it may be necessary to obtain a European Protected Species (EPS) licence from the relevant statutory body (Natural England (NE), Countryside Council for Wales (CCW) or Scottish natural Heritage (SNH)). It is possible to undertake surveys which would otherwise involve unlawful acts, such

as disturbance, by obtaining a survey licence which provides authorisation for scientific and educational purposes

Reptiles

The four common reptile species, adder *Vipera berus*, grass snake *Natrix helvatica*, common lizard *Zootoca vivipara* and slow worm *Anguis fragilis* are protected under Schedule 5 of the Wildlife and Countryside Act (1981, as amended) against deliberate and/or intentional killing, injuring and trade.

If common reptile species are found to be present or considered potentially present within a proposed development site. To ensure that no subsequent offence will be committed a precautionary method of working (written by a suitably qualified ecologist) and submitted to the relevant authority may be required to enable works to proceed with limited risks of offences being caused.

Birds

All birds, their nests and eggs are protected by the Wildlife and Countryside Act (1981, as amended). It is an offence to intentionally kill, injure, or take any wild bird, or take or destroy an egg of any wild bird. It is also an offence to damage or destroy the nest of any wild bird (whilst being built, or in use). Therefore, clearance of vegetation within the site boundary, or immediately adjacent to the site during the nesting season could result in an offence occurring under the Act. The bird breeding season can be taken to run between the 1 February and 31 August and is subject to geographical and seasonal factors. There are 79 species of birds listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). It is an offence to intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

Barn owls *Tyto alba* are given the highest level of legal protection possible under Schedule 1 of the Wildlife and Countryside Act 1981. It is therefore illegal to kill, injure or take a barn owl, or to take or destroy its eggs. It is also illegal to intentionally or recklessly take, damage, or destroy the nest of any wild bird while it is in use or being built, release or allow the escape of a barn owl into the wild or possess any bird (dead or alive) or part of bird without a licence which is obtainable through the country agencies (EN, SNH, and CCW).

Badgers

Badgers *Meles meles* are protected under the Protection of Badgers Act (1992) and the Wildlife and Countryside Act (1981, as amended). As such it is an offence to wilfully take, kill, injure or ill-treat a badger, or possess a dead badger or any part of a badger. Under the Act their setts are also protected against obstruction, destruction, or damage in any part.

Sett interference includes damaging or destroying a sett, obstructing access to a sett, and disturbing a badger whilst it is occupying a sett. The Act defines a badger sett as 'any structure or place, which displays signs indicating the current use by a badger' and Natural England takes this definition to include seasonally used setts.

Work that may disturb badgers or their setts is illegal without a development licence from the relevant statutory body (NE, CCW, SNH). As a precautionary principle, a buffer distance between a badger sett and the works will be determined, based upon guidance from an appropriately experienced ecologist. This buffer distance should be based upon the size and activity levels at the sett, the topography between the sett and the works and the nature of the works.

Bats

All native UK bat species are fully protected by UK law under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) and Schedule 6 of the Wildlife and Countryside Act (1981, as amended), and under Schedule 2 of the Conservation of Habitats and Species Regulations 2017. It is illegal to deliberately

capture, injure or kill a bat or to intentionally or recklessly disturb bats. It is also illegal to damage, destroy or intentionally or recklessly obstruct access to a breeding or resting place used by a bat.

Any activity that would result in a contravention of the above legislation would likely require an EPS licence from the relevant statutory body (NE, CCW or SNH). Works or mitigation activities involving interference with bats or bat shelters must be carried out by a licensed bat worker.

Dormice

Dormice *Muscardinus avellanarius* are protected under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) of the Wildlife and Countryside Act (1981, as amended) and are listed in Schedule 2 of the Conservation of Habitats and Species Regulations 2017. Under the current legislation it is illegal to intentionally or deliberately kill, injure or capture dormice, deliberately disturb dormice (whether in a nest or not); or to damage, or destroy dormouse breeding sites or resting places.

Any activity that would result in a contravention of the above legislation would likely require an EPS licence from the relevant statutory body (NE, CCW or SNH).

Otters

The otter *Lutra lutra* is fully protected under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) of the Wildlife and Countryside Act (1981, as amended) and are listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017. It is therefore illegal to deliberately capture, injure or kill an otter, possess an otter (dead or alive), or any other part of an otter, or intentionally or recklessly disturb otters. It is also illegal to damage, destroy or intentionally or recklessly obstruct access to a holt or other resting place used by an otter.

Any activity that would result in a contravention of the above legislation would likely require an EPS licence from the relevant statutory body (NE, CCW or SNH).

Water voles

Water voles *Arvicola amphibious* are protected under Schedule 5 of the Wildlife and Countryside Act (1981, as amended). It is an offence to possess, control or sell water voles or to intentionally kill, injure or take water voles. It is also an offence to intentionally or recklessly damage, destroy or obstruct access to a place that water voles use for shelter or protection or disturb water voles whilst using such a place.

A licence is required for catching/handling water voles, or for field surveys that are intrusive or disturbing where the surveyor suspects' water voles are present. A licence can be obtained by applying to the relevant statutory body (NE, SNH, and CCW,). Please note that the legislation does not permit licences to be issued in relation to development of land.

Biodiversity Policies

National Planning Policy Framework (NPPF) 2024

Published in 2024 the NPPF sets out the Government's planning policies for England and how these are expected to be applied by local authorities. It replaces all the Planning Policy Statements and Guidance (PPSs and PPGs). The NPPF emphasises the need for sustainable development, whilst specifying the need for protection of designated sites and priority habitats and priority species (as listed in section 41 of the Natural Environment and Rural Communities (NERC) Act 2006). Paragraph 187 of The National Planning Policy Framework (NPPF) states:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

Paragraph 192 states that "to protect and enhance biodiversity and geodiversity, plans should:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

Furthermore, paragraph 193 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for

biodiversity or enhance public access to nature where this is appropriate.

Paragraph 194 states:
"The following should be given the same protection as habitats sites:

- potential Special Protection Areas and possible Special Areas of Conservation;
- listed or proposed Ramsar sites; and
- sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."

Paragraph 195 states:
"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site."

The UK Biodiversity Framework (2011-2020).
The UK Biodiversity Framework is an important framework that is owned, governed and implemented by the four UK countries, assisted by Defra and JNCC in their UK co-ordination capacities. Although differing in details and approach, the four UK countries have published strategies which promote the same principles and address the same global targets: joining-up our approach to biodiversity across sectors; and identifying, valuing and protecting our 'Natural Capital' to protect national well-being now and in the future. This new framework has been developed to enhance the recovery of priority habitats and species in England (published under section 41 of the NERC Act 2006), thereby contributing to the delivery of the England Biodiversity Strategy. The framework has been developed and endorsed by the England Biodiversity Group and wider partnership. It is the starting point for a more integrated approach to biodiversity conservation in England, building on the strengths of the former UK Biodiversity Action Plan (BAP) process and improving those areas where insufficient progress was being made.

Gravesham Local Plan Core Strategy (Gravesham Borough Council, 2014).
The Gravesham Local Plan Core Strategy sets out the relevant policies for the control of development with regards to the natural environment and biodiversity.

Policy CS12: Green Infrastructure

A multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained. The network will improve access within the urban area, from the urban area to the rural area and along the River Thames. The key parts of the network are identified on Figure 19: Strategic Green Infrastructure Network.

Sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites, followed by nationally designated Sites of Special Scientific Interest, followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity.

There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.

Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

The overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Cluster Studies where relevant.

Appendix III: Ecological Walkover Survey Map

LEGEND:

- Red Line Boundary
- Existing Very Large Rural Tree
- Existing Large Rural Tree
- Existing Medium Rural Tree
- Existing Small Rural Tree
- Non-native and ornamental hedgerow
- Ecologically valuable line of trees
- Native hedgerow
- Species-rich native hedgerow
- Artificial unvegetated, unsealed surface
- Bramble scrub
- Developed land; sealed surface
- Mixed scrub
- Modified grassland
- Other neutral grassland
- Vegetated garden

STATUS: FOR INFORMATION ONLY

PJC

Bussex Office: Rocks Yard, Victoria Rd, Henfrmanceux, Hailsham, BN27 4TQ.
T: 01323-832129.

Kent Office: The Watermill, The Hill Business Park, Maidstone Road, Ashford, TN26 1AE.
T: 01233 225385
E: contact@pjcconsultancy.com
W: www.pjcconsultancy.com

CLIENT: [redacted]

PROJECT: Woodlands Farm
Culverstone
DA13 0RQ

TITLE: Pre-Development (Baseline) Habitat Map

SCALE AT A4:	DRAWN:	APPROVED:
1:2,000	TK	TK
PROJECTION:	DATE:	DATE:
EPSG:27700	29/07/26	29/07/26

DRAWING No: PJC/7022E/26/A2/V1

Appendix IV: Site Photographs

All Site photographs were taken by Naomi Cornwell BSc(Hons) MSc on 7th May 2026.

Photograph 1: Building B1 northern elevation..

Photograph 2: Northern boundary of residential section of site.

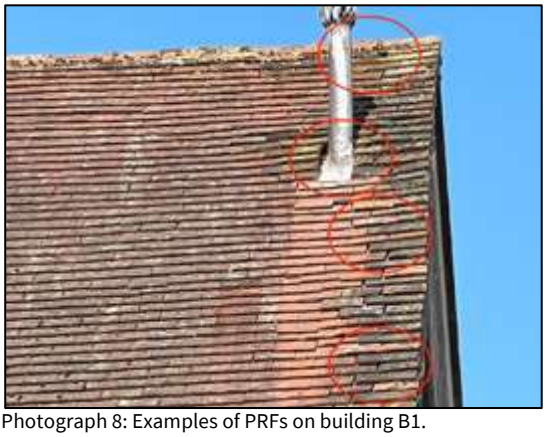
Photograph 3: B1a northern elevation.

Photograph 4: Example of PRF on B1a.

Photograph 5: Gaps at eaves of B1a.

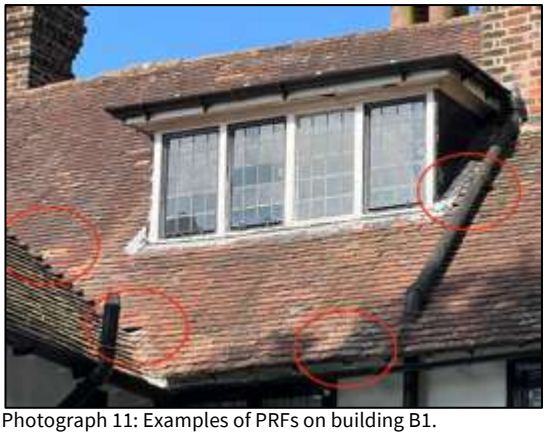
Photograph 6: Eastern elevation B1a.

Photograph 7: Eastern elevation B1.


Photograph 8: Examples of PRFs on building B1.

Photograph 9: Examples of PRFs on building B1.

Photograph 10: Southern elevation of B1.


Photograph 11: Examples of PRFs on building B1.

Photograph 12: Examples of PRFs on building B1.

Photograph 13: Rhododendron in garden, western boundary.

Photograph 14: Tree T49.

Photograph 15: Examples of PRFs in T49.

Photograph 16: Examples of PRFs in T49.

Photograph 17: Building B2, the stables.

Photograph 18: Internal view of the stables.

Photograph 19: Garden orchard.

Photograph 20: Western boundary vegetation within garden.

Photograph 21: Tree T9.

Photograph 22: Examples of PRFs in T9.

Photograph 23: Examples of PRFs in T9.

Photograph 24: Looking southwards through private garden.

Photograph 25: Area south of the sand school.

Photograph 26: Equine sand school.

Photograph 27: Southern elevations of the stables and barn.

Photograph 28: Modified grassland area south of the sand school.

Photograph 29: Other neutral grassland bordered by scrub.

Photograph 30: Scrub and mature oaks in southern section of Site.

Photograph 31: Mammal push through in south-eastern section of the Site.

Photograph 32: Other neutral grassland with horses grazing in background.

Appendix V: Precautionary Non-Licensed Method Statement

MITIGATION MEASURES

The mitigation measures detailed below are provided to ensure that in the unlikely event of GCN being present within the Site, they are protected from death, injury or disturbance, and that their resting places are also protected from damage, destruction, or obstruction of access.

PRIOR TO CONSTRUCTION WORKS

All site workers undertaking any habitat clearance works will receive an ecological Tool Box Talk (TBT) with a focus on GCN from a suitably qualified ecologist prior to undertaking habitat clearance works on Site.

DURING CONSTRUCTION WORKS

Access and egress routes for people and plant must be kept to existing areas of hardstanding, bare earth and grassland (providing the grassland sward has been maintained below 100mm in height).

Habitat clearance must be conducted using a two-stage directional approach, first reducing the vegetation to approximately 100mm above ground, then the second cut reducing it to ground level. This technique will allow any protected species potentially present within the Site to naturally disperse to other areas of suitable semi-natural habitat within the surroundings.

An ecologist must hand search the cleared areas either before the first cut, or immediately after, depending on the height of the vegetation and visibility.

Potential refuge features, such as exposed tree roots and mammal burrows potentially used by hibernating GCN must not be moved or affected during the hibernation season (November to March). All features must be deconstructed sensitively, whereby removing half of the feature (top-down) and removing the second half after 24 hours.

All suitable GCN habitat removal must be supervised at all times by a suitably qualified ecologist.

All arisings generated from habitat clearance works must be removed from Site and should not be stored on Site for any longer than a 24-hour period. In the event that this is not possible, all arisings must be stored within a skip or a minimum of 10m away from retained suitable GCN habitat, and only on existing hardstanding or bare earth.

All excavations should be excavated individually and back filled immediately where possible. Where this is not possible, excavations must be covered to prevent GCN (and other animals) becoming trapped within the excavation. If this is also not possible, one or both sides of the excavation must be sloped in order to allow egress from the excavation.

All machinery, equipment and materials must be stored on areas identified by an ecologist as being unsuitable for GCN, for example, grassland of a short sward.

All site workers, particularly those involved in habitat clearance works, must remain vigilant at all times during construction works if at any point during construction works any protected species or signs of protected species, including GCN are identified, the following instructions must be adhered to:

- Stop works immediately and leave the area;

- Inform an ecologist immediately who will then provide further guidance/instructions;
- Do not try to handle a GCN; and
- Do not resume construction works until advised it is safe to do so by a suitably qualified ecologist.

CONTACT DETAILS

Kent Office:

The Watermill

The Mill Business Park

Maidstone Road

Ashford

Kent

TN26 1AE

Tel: 01233 225365

Author: Naomi Cornwell BSc(Hons) MSc

Date: 20th July 2026

E-mail: naomi@pjcconsultancy.com