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To Whom it Concerns,

4th of December 2024

Site: Land To The West Of Nursery Mews, Gravesend, Kent, DA11 7BU.

Proposal: Erection of 6no. affordable residential dwellings, emergency access / pedestrian / cycle route with associated parking and landscaping.

I am responding to the additional information requested regarding the above site.

Potential for Reptiles

It has been suggested that the on-site habitat could be suitable for reptiles. It is acknowledged that many of our common native reptile species have similar habitat requirements. Favoured sites for common lizard (*Zootoca vivipara*), slow-worm (*Anguis fragilis*) and adder (*Vipera berus*) include heathland, scrub and areas of rough grassland. Grass snakes (*Natrix helvetica*) largely predate on amphibians, so they are usually found near water (ponds, lakes, ditches, canals, gravel pits, etc.) adjacent to open terrestrial habitats. Reptiles require warmth from the sun to regulate their body temperature, achieving this through basking. The lower the ambient air temperature, the more time needed to warm up. The application site includes sealed surfaces, individual trees and ruderal species, making it unsuitable for reptiles.

Permeability refers to a species' ability to move through the landscape and depends on the species and the structural similarity of the landscape to the habitat the species prefers. The site's ecological permeability is considered extremely low due to the presence of roads and dwellings, sealed surfaces, cat predation, and close-mown grasslands, all of which will discourage movement.

A further consideration in assessing the suitability of reptiles in the existing habitats is their low degree of habitat connectivity. Connectivity refers to the degree to which the landscape facilitates movement between different habitat patches. There are two types of



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connectivity: structural connectivity and functional connectivity. Structural connectivity refers to physical connections in the landscape between habitat patches (often called "corridors", although they do not necessarily have to be linear features). Functional connectivity refers to how much the landscape helps or hinders the movement of species and often relates to the vegetation structure or the management intensity. Functional connectivity is species-specific (as it depends on the mobility of the species and the habitat types present in the landscape). A low degree of connectivity occurs due to the lack of heathland, scrub, and rough grassland areas. In addition, the site is not considered a suitable habitat for reptiles, and its permeability to suitable habitats is considered low. The proposal is not considered to harm reptiles or their habitats.

Breeding Birds

Several suitable trees overhang the site, which birds could use for breeding. Therefore, suitable habitats must be removed outside the bird breeding season. Suppose work during the breeding season is unavoidable. In that case, a suitably experienced ecologist will need to inspect the site immediately before the start of site clearance to identify nests. If active nests are found, an exclusion zone will be set up around the nest(s), and work must only continue once the young have fledged.

Biodiversity Net Gain

The metric, which includes the baseline calculation, has been uploaded to the portal.

Biodiversity Net Gain

A habitat map is attached.

Many thanks,

Yours faithfully,

Andrew May

Managing Director