LAND OFF WROTHAM ROAD
MEOPHAM

Ecological Impact Assessment (EcIA)

Client:

Richborough

Report Reference:

RSE_8996_R3_V1_EcIA

Issue Date:

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RammSanderson

ECOLOGY
FLOOD RISK
ARBORICULTURE
HABITATS
TRAINING

CIEEM
REGISTERED PRACTICE 2025-2026

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DISCLOSURE:

EXECUTIVE SUMMARY

i RammSanderson Ecology Ltd were commissioned by Richborough to undertake an Ecological Impact Assessment to support an Outline application for residential (the 'Scheme') on Land off Wrotham Road (the 'Application Site' or 'Site') situated adjacent to the village of Meopham, Kent.

ii The Application Site is 15.75ha in size and consists of non-cereal cropland, modified grassland and two native hedgerows with a road along the western boundary. A previous survey of the area and the wider landscape was undertaken to inform an initial assessment of the likelihood of protected species on the Site. The Preliminary Ecological Appraisal Report or PEAR (RammSanderson, 2025). This highlighted suitable bat foraging habitat along the northern boundary (woodland) and trees with bat roost potential along the southwestern and northern boundary.

iii The habitats on Site had very low suitability for reptiles and great crested newts due to the dominance of arable fields, with only marginal vegetation offering limited refuge and foraging opportunities. Therefore, standard precautionary measures detailed within a standalone Construction and Ecology Management Plan (CEMP) is recommended to mediate residual risk and further surveys for these species was scoped out.

iv The potential for birds of conservation concern and dormice on the Site was identified within the PEAR and further surveys were recommended. These have since been undertaken.

v Bats represent the most significant ecological constraint on Site, with local populations utilising the strip of linear woodland along the northern boundary and the southern boundary. Critically however, the landscape proposals seek to retain this are and provide green infrastructure buffer which will retain this as a foraging resource and so impacts at the population level are deemed highly unlikely provided A Bat Friendly Lighting Scheme is secured as part of a reserved matters application within the detailed design phase. Additionally, several trees at the northern edge were identified as PRF-I and PRF-M for bats with a series of crossing point assessments undertaken. As it currently stands the outline application includes a potential cycleway/footpath link which may warrant some tree clearance in this zone. However, the precise location of this is to be confirmed as part of a reserved matters application and additionally noting it is only a footpath / cycleway the likely impacts are limited and can be sensitively designed to accommodate important ecological features. The crossing point assessments show with a high degree of certainty that the trees in this cluster do provide small day roosts for common pipistrelle. It is recommended that the detailed design seeks to avoid PRF-M trees within the design and where this isn't feasible, targeted emergence surveys are undertaken in respects to provision of a European Protected Species Licence, however it is anticipated that the need for such as EPSL can be avoided through sensitive final design.

vi Nesting birds may also be present and potentially impacted by the works. Mitigation to either avoid the nesting season or check vegetation and buildings prior to demolition would protect birds and prevent impacts to this species group.

vii Standard measures to control pollutants, dust and other contaminants would protect the woodland, which is situated along the southern boundary to the Application Site. In addition, a 15m buffer from this woodland should be maintained to protect the roots for retained sections along northern boundary.

viii The two hedgerows will be retained on Site and H1 will be enhanced. Works will result in the loss of the arable field and temporary loss of some of the modified grassland. The landscape planting scheme includes the creation of other neutral grassland, modified grassland, Sustainable Urban Drainage System (SUDs), trees and residential buildings with associated hard standing on-site.

ix This Scheme, along with offsetting within the district on adjacent land would deliver a 15.08% net gain of biodiversity area units and 12.49% net gain in hedgerow linear units, and therefore would be in accordance with national legislation (Environment Act, 2021) as well as national (National Planning Policy Framework) and local

planning policies (The Gravesham Local Plan Core Strategy adopted in September 2014 and the Kent Biodiversity Strategy, 2020).

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1 INTRODUCTION

1.1 Terms of Reference

i RammSanderson Ecology Ltd (RS) were commissioned by Richborough (the Applicant) to undertake an Ecological Impact Assessment (EcIA) to support an Outline application for the erection of residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Wrotham Road, and all other matters are reserved (hereafter referred to as the 'Scheme'), located off Wrotham Road in Meopham, Kent. All land situated within the red line of the Scheme is hereafter referred to as the 'Application Site' or 'Site' and is shown on Figure 1.

ii The purpose of this EcIA is to demonstrate how the Scheme accords with relevant national and local planning policy and legislation. Further details on relevant planning policy and legislation are provided in Appendix A.

iii This EcIA details the methodology followed to undertake the assessment, describes the ecological baseline relevant to the Scheme and evaluates the nature conservation importance of ecological features present within the Study Area (see Section 2). The EcIA characterises the impacts (both positive and negative) of the Scheme on Important Ecological Features (IEF)[1], and where necessary, sets out appropriate and proportionate avoidance, mitigation and compensation measures that will be delivered by the Applicant. The significance of any residual effects (both positive and negative) of the Scheme on the IEFs has been assessed, and opportunities for enhancement are identified with the overall aim of achieving biodiversity net gain through the Scheme.

iv This EcIA forms part of the supporting technical documentation for the planning application submitted for the Scheme and has been undertaken with reference to current good practice[2] and is consistent with the requirements of British Standard 42020:2013 *Biodiversity. Code of Practice for Planning and Development*.

1.2 The Scheme

i The Scheme relates to and Outline application for residential development of the Site (currently used as cropland) and associated parking and roadways. Plans include extensive green infrastructure with two Sustainable Urban Drainage basins along the northern boundary, a belt of grassland with a community orchard. Drainage basins and scattered trees along the eastern boundary and further public open space and tree planting along the southern boundary.

1.3 The Application Site

i The Site is located within the village of Meopham, Kent at Ordnance Survey national grid reference TQ 64606 66632and is approximately 15.75ha in size.

ii The Site comprises primarily cropland habitats, with modified grassland margins, bordered by hedgerows. The Site is bounded by areas of woodland, additional cropland and residential areas, and the wider area consists of further agricultural and residential areas.

[1] Important Ecological Features are habitats, species, ecosystems and their functions and processes that are of conservation importance and could potentially be affected by the Scheme. Various characteristics contribute to a feature's importance including its rarity, diversity, size, population trend, distinctiveness, naturalness, fragility, typicalness, recorded history, potential value and intrinsic appeal.

[2] CIEEM (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

2 METHODOLOGY

2.1 Scope of the EcIA

i The EcIA has been undertaken as follows:

- Define the Study Area for the assessment, which considers the Zone of Influence3 (ZoI) of the Scheme.
- Undertake desk and field-based assessments for designated sites, habitats and species to determine the ecological baseline for the Scheme within the Study Area.
- Determine the nature conservation importance of each ecological feature recorded during the desk and field-based assessments to determine which of those features are IEFs in the context of the EcIA.
- Assess the potential impacts on IEFs because of the Scheme.
- Design suitable avoidance and mitigation measures to address potential impacts.
- Determine the significance of any residual effects and design suitable compensation measures to address significant residual effects; and,
- Identify opportunities for biodiversity enhancements including delivery of Biodiversity Net Gain (BNG).

2.2 Important Ecological Features

i The EcIA has focused on the potential impacts to ecological features (habitats, species, ecosystems and their functions/ processes) that are considered important and potentially affected by the Scheme. The EcIA has not carried out detailed assessments of features that are sufficiently widespread, unthreatened and resilient to impacts and which will remain viable and sustainable should the Scheme proceed as detailed in Section 1.

ii For this EcIA, the following are considered IEFs requiring detailed assessment:

- Statutory designated sites.
- Non-statutory designated sites.
- Habitats and species of principal importance (HoPI / SoPI) for the conservation of biodiversity in England[4].
- Irreplaceable habitats including ancient woodland and veteran trees.
- Individual habitat types or mosaics that may not quality as HoPI but form an important part of ecosystems and their function.
- Legally protected species[5]
- Species of conservation concern, Red Data Book (RDB) species – UK[6].
- Birds of Conservation Concern – UK[7].

iii The EcIA has also considered legally controlled plant species listed as invasive on Schedule 9 of the Wildlife and Countryside Act 1981 in Britain (e.g., Japanese knotweed, Himalayan balsam, giant hogweed).

[3] The Zone of Influence is the area over which ecological features may be affected by biophysical changes because of the Scheme and associated activities.

[4] Listed under S41 of the Natural Environment and Rural Communities Act 2006. http://publications.naturalengland.org.uk/publication/4958719460769792.

[5] Legally protected species are those listed on the Wildlife and Countryside Act 1981, The Conservation of Habitats and Species Regulations 2018, Protection of Badgers 1992.

[6] Species Status Assessment project published by Joint Nature Conservation Committee (JNCC) in 1999. http://jncc.defra.gov.uk/default.aspx?page=3352.

[7] (Eaton MA, Aebischer NJ, Brown AF, Hearn RD, Lock L, Musgrove AJ, Noble DG, Stroud DA and Gregory RD (2015). Birds of Conservation Concern 4: the population status of birds in the United Kingdom, Channel Islands and Isle of Man.

2.3 Study Area

i Desk and field-based studies have been undertaken to establish the biodiversity baseline that may be impacted by the Scheme. The scale of the Study Areas varies dependent upon the ecology of the feature being assessed and its vulnerability to change resulting from construction and operation of the Scheme. Ecological features outside of the Study Area are unlikely to be affected by the Scheme and are not considered in this EcIA.

ii Table 1 summarises the Study Area for the Scheme.

Table 1. Background Records and Field Surveys Study Areas

Ecological Feature	Background Records Study Area[8]	Field Survey Study Area[9]
Designated Sites and Habitats	2km	Within and adjacent to the Application Site
Great crested newt	1km	500m
Badger	1km	30m
Other protected and notable species	1km	Within and adjacent to the Application Site

2.4 Desk Study

2.4.1 Background Records

i A desk study has been undertaken to obtain background records relevant to the Scheme and the EcIA, including records of statutory and non-statutory designated sites and protected and notable species within the Study Areas detailed above in Table 1. The data obtained provides contextual information for the scope of field surveys, to aid the evaluation of field survey results, and to provide supplementary information where complete field survey coverage has not been possible.

ii Data has been obtained from Kent and Medway Biological Records Centre in February 2025.

2.4.2 Planning Policy

iii To demonstrate how the Scheme accords with relevant national and local planning policy, the following have been reviewed as part of this assessment:

- The Gravesham Local Plan Core Strategy adopted in September 2014; and
- Kent Biodiversity Strategy 2020.

2.5 Field Surveys

i Field surveys have been designed to collect information on the habitats and species present that may be affected by the Scheme. The geographical areas across which field surveys have been undertaken are the areas over which ecological features are likely to be subject to impacts from the construction or operation of the Scheme if they are present and accounting for the Scheme design measures detailed in Section 1.

ii Table 2 summarises the field surveys that have been undertaken to inform the EcIA.

[8] Distance measured from the Application Site Boundary.
[9] Distance measured from the Application Site Boundary.

iii Detailed methodologies for collection of field survey data, and any specific limitations and deviations encountered during these surveys, are presented in Appendix 2.

Table 2. Field Surveys undertaken to inform EcIA (full dates provided in Appendix 2)

Ecological Feature	Survey Type	Date(s) of Survey(s)
Habitats	UKHabitat Survey	Winter 2024/Updated Summer 2025
Wintering birds	Wintering Bird Survey	Winter 2024
Breeding birds	Breeding Bird Survey	Spring 2025
Bats	Night time walkovers, static monitoring and crossing point surveys	Spring, summer and autumn 2025
	Ground Level Tree Assessment (GLTA)	Summer 2025
Dormice	Presence/likely absence	Spring-autumn 2025

iv No other field surveys have been undertaken to support this EcIA as they were considered unnecessary (see Section 3 for more details).

2.6 Assessment criteria

i This EcIA broadly follows CIEEMs Guidelines for Ecological Impact Assessment in the United Kingdom with the following clarifications specific to the Scheme.

2.6.2 Nature conservation evaluation

ii Several criteria have become accepted as a means of assessing the nature conservation importance of a defined area of land which are set out in *A Nature Conservation Review*[10] and include diversity, rarity and naturalness.

iii For this EcIA, the nature conservation importance or potential value of an ecological feature is determined within the following geographic context:

- International (Europe): such as Special Areas of Conservation (SAC) or Special Protection Areas (SPA).
- National (England): such as Sites of Special Scientific Interest (SSSI);
- Regional (*): such as populations of species which enrich biodiversity on a regional scale and whose loss would significantly affect the species national distribution.
- County (Kent): such as Local Nature Reserves (LNR) or populations of species which qualify for Local Wildlife Site (LWS) designation.
- Local (Meopham): undesignated ecological features such as old hedges, woodlands, ponds;
- Site: the feature has some ecological importance, but is not of a scale warranting consideration outside of the boundaries of the Application Site itself; and

[10] Ratcliffe, D. (1977). *A Nature Conservation Review*.

- Negligible: the feature either has little or no importance for biodiversity, or is considered sufficiently widespread, unthreatened, and resilient to impacts and will remain viable and sustainable.

*A geographical area for Regional importance has not been defined. A feature is of 'Regional' importance when it is of greater geographical importance than within Kent, but does not reach the threshold to be of National importance.

iv Ecological features of Local or higher nature conservation importance are considered IEFs requiring detailed assessment. In addition, for the EcIA to demonstrate how the Scheme will comply with statutory requirements and policy objectives for biodiversity, some ecological features are considered IEFs even if they are not of Local or higher nature conservation importance. These are features that are protected by national legislation and include:

- Badgers, legally protected through the Protection of Badgers Act, 1992;
- All nesting birds, legally protected through the Wildlife and Countryside Act, 1981; and,
- Non-native invasive plant species, listed on Schedule 9 of the Wildlife and Countryside Act, 1981.

2.6.3 Temporal scope

v Potential impacts on IEFs have been assessed in the context of how the predicted baseline conditions might change between the surveys and the start of construction.

vi Long-term trend information was used to make judgements about the significance of an impact or effect on the conservation objectives or condition of a designated site, or the conservation status of a habitat or species (for example a species with a long term, national population decline may be more susceptible to impacts attributable to the Scheme). Where this information was available it is referenced in Section 4.

vii A high-level construction programme for the Scheme is outlined in Section 1. Once construction is complete, this EcIA has assumed that the operational phase of the Scheme will last for the foreseeable future.

2.6.4 Approach to mitigation

viii Where impacts on IEFs are predicted, the approach to mitigation engages the following hierarchy:

- Avoid features where possible.
- Minimise impact by design, method of working or other measures, for example by enhancing existing features; and,
- Compensate for significant residual impacts (e.g., by providing suitable habitats elsewhere).

ix The highest level of the hierarchy has been applied where possible. Only where this cannot reasonably be adopted have lower levels been considered. The rationale for the proposed level of mitigation has been detailed in Section 4, including sufficient detail to show that these measures are feasible and will be provided by the Applicant.

x NPPF (2024) states that:

> *"development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate".*

xi Throughout this EcIA, the potential to secure biodiversity enhancement, and therefore overall net gain, has been considered.

2.7 Limitations to the Assessment

i The ecological surveys undertaken to support this EcIA have not produced a complete list of plants and animals and the absence of evidence of any particular species should not be taken as conclusive proof that the species is not present or that it will not be present in the future. However, the results of these surveys have been reviewed and are considered to be sufficient to undertake this EcIA.

3 BASELINE CONDITIONS AND NATURE CONSERVATION IMPORTANCE

i The following sections provide a summary of the baseline conditions relevant to the Scheme and the assessment of potential impacts of the Scheme on biodiversity. The baseline is based on the results of the desk and field-based studies undertaken within the Study Area to inform this EcIA.

ii Regarding background data, 'recent' records are considered to be those no older than 10 years from the date of the desk study. Records outside of this period are historical and have only been reported where more recent records do not exist. Exceptions to this are detailed in the appropriate sections below.

iii Ecological features which are present or considered likely to be present within the Study Area have been assigned a geographical scale of nature conservation importance in line with the criteria detailed in Section 2. Nature conservation importance is summarised in Table 6.

iv Where it has not been possible to achieve 100% survey coverage for a habitat or species, the baseline conditions have been based on a reasonable precautionary approach, supported by the results of the desk study.

3.2 Designated Sites

i Table 3 summarises the designated sites situated within the Study Area.

Table 3. Designated Sites within Study Area

Site Name	Designation	Location[11]	Brief Description
North Kent Woods and Downs	NNR*	1.5km SE 1.5km E 1.6km E	3 large parcels, crossing over the search perimeter. Home to many veteran trees as well as nationally significant arable plants.
Henley Wood & Pasture	LWS**	0.5km SE	Ancient Woodland and Deciduous Woodland Priority Habitat
Happy Valley, Meopham	LWS	0.9km S, additional two parcels further south.	Contains Ancient woodland, Ancient Replanted Woodland, Deciduous Woodland and Lowland Calcareous Grassland Priority Habitats.
Strawberry Hill, Pasture & Woodland, Meopham	LWS	0.9km SE	Ancient Woodland and Deciduous Woodland Priority Habitat
Elbow Wood etc, Meopham	LWS	1.6km SW	Ancient Woodland, Deciduous Woodland and Lowland Calcareous Grassland Priority Habitats.
Nurstead and Cozendon Woods, Nash Street	LWS	1.5km N, additional one parcel connected but further west.	Ancient Woodland and Deciduous Woodland Priority Habitat
Pasture and woods south of Luddesdown	LWS	1.7km SE	Ancient Woodland, Deciduous Woodland and Lowland Calcareous Grassland Priority Habitat

[11] Where designated sites are situated outside of the Site boundary, the distance and direction is given at the closest point of the designated site from the Site
* NNR – National Nature Reserve
** LWS – Local Wildlife Site
*** RNR – Roadside Nature Reserve

Site Name	Designation	Location[11]	Brief Description
Longfield Road (East)	RNR***	0.8km NW	-
Longfield Road (West)	RNR	1.9km NW	-
Wrotham Road	RNR	1.5km N	Overlaps with Nurstead and Cozendon Woods, Nash Street LWS and Ancient Woodland.

3.3 Habitats

3.3.1 Desk Study

i Table 4 summarises relevant records of HoPI[12], ancient woodlands, and protected and/or notable[13] flora[14] (including veteran trees[15]) within the Study Area.

Table 4. HoPI, Ancient Woodland and Protected and Notable Flora within Study Area

Habitat/ Flora Feature	Reason for Conservation Interest	Location[16]	Desk Study Comments
Nine Acre Bank Shaw	Ancient Woodland	0.8km S, additional 18 parcels in all directions	
Deciduous Woodland	Priority Habitat, LBAP	Onsite; small area within the southeastern corner of the Site. Additional 86[17] parcels to the north, south, east and west of the Site.	Scattered areas of Deciduous Woodland. Some overlap with Ancient Woodland.
Woodpasture and Parkland	May support ancient woodland, ancient trees and veteran trees.	0.3km E	Overlaps with Deciduous Woodland.
Traditional Orchards	Priority Habitat, LBAP	Closest 0.5km NE, additional 12[18] parcels to the northeast, northwest,	Small in extent scattered areas of Traditional Orchards

[12] Priority habitats are taken as principal habitats for the conservation of biodiversity listed under Section 41 of the Natural Environment and Rural Communities Act 2006.
[13] Protected and/or notable flora are taken as principal flora for the conservation of biodiversity listed under Section 41 of the Natural Environment and Rural Communities Act 2006; any flora listed in an IUCN Red Data Book; and any other flora listed under the County Rare and Scarce Plants in Buckinghamshire list (BMERC, 2012).
[14] For this assessment 'flora' includes: vascular and non-vascular plants, fungi and lichens.
[15] For this assessment the definition of a veteran tree is taken from Annex 2 of the National Planning Policy Framework (glossary): "A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape, or culturally."
[16] Where features are situated outside of the Site boundary, the distance and direction is given at the closest point of the designated site from the Site
[17] Six parcels are considered 'no main habitat but deciduous woodland present' by MAGIC.
[18] Two parcels are considered 'no main habitat but traditional orchards present' by MAGIC.

Habitat/ Flora Feature	Reason for Conservation Interest	Location[16]	Desk Study Comments
		southeast and south.	
Lowland Calcareous Grassland	Priority Habitat	1.1km S, additional 6[19] parcels south, southeast and southwest.	Exists adjacent to areas of Ancient Woodland. SE parcel overlaps with Deciduous Woodland.
Good Quality Semi-improved grassland	May be botanically species rich.	1.6km SE 1.6km SE	Two parcels. Very small in extent area present adjacent to Lowland Calcareous Grassland and Deciduous Woodland to SE.
Bluebell	Schedule 8 of Wildlife and Countryside Act	0.3km E	4 records found in desk study.
Variegated Yellow Archangel	Schedule 9 Plant Species	0.3km E	2 records found in desk study.
Common Rhododendron	Schedule 9 Plant Species	0.3km SW	1 record found in desk study.
Himalayan Cotoneaster	Schedule 9 Plant Species	0.7km S	1 record found in desk study.

3.3.2 Field Survey

ii Table 5 summarises the results of the habitat survey and detailed botanical surveys. Habitats are shown on Figure 2, with specific features highlighted by TNs. Native hedgerows >80% woody species were recorded on Site. These are a Habitat of Principal Importance/HPI (NERC Act, 2006). The woodland on Site did not qualify as HPI.

iii Habitat types detailed are listed in order of the UKHab Survey Handbook (UKHab Ltd, 2023). The species list provided in this report reflect only those taxa observed during the survey and are not an exhaustive list of all species that may be present, as the survey only provides a snapshot of the Site. The habitat mosaic of grassland, crops and hedgerow vegetation within the Application Site is of Site level nature conservation importance. These habitats are common and widespread across the wider landscape, are not botanically diverse nor do they offer significant opportunities for notable or protected species

[19] Two parcels are considered 'no main habitat but lowland calcareous grassland present' by MAGIC.

Table 5: Habitats within Survey Area

Habitat	Description	Area (m^2)	Proportion of Site (%)	Ecological Importance & Outcome of Proposal	Photograph
G4 Modified grassland	Parcels of this habitat were recorded along the northern, western and southern field margins. This was dominated by perennial rye grass with abundant cock's foot. Creeping buttercup, spear thistle and bristly oxtongue were also recorded occasionally alongside locally abundant nettle and ground ivy.	11925	7.57	Limited ecologically value due to the lack of floral diversity, vehicle tracking through the grass and limited spread of the habitat within the Site. This habitat is mostly noted for its suitability for commuting and foraging mammals, such as badger. This habitat is likely to be retained and enhanced throughout the Site.	
C1d Other non-cereal crops	The Site was dominated by non-cereal cropland, covering over 70% of the Site area.	143489.3	91.09	Limited ecologically value due to the current management, presence of bird scaring devices, lack of floral diversity and openness of the habitat. Mostly noted for its suitability to support commuting and foraging mammals, such as badger. May also support ground nesting birds once the bird scaring devices are no longer in use. This habitat is due to be developed as part of the proposed Scheme, or enhanced.	

Habitat	Description	Area (m^2)	Proportion of Site (%)	Ecological Importance & Outcome of Proposal	Photograph
W1g Other Broadleaved woodland	Five-meter-wide strip of woodland between the field margin and the road along northern boundary. Mixture of mature and semi mature trees comprising ash, horse chestnut and sycamore. The understory was formed of holly and rose with a ground flora of daffodils, lords and ladies and cleavers. Snowdrop was also recorded in this habitat.	1896.53	1.2	Ecologically valuable as acts as a commuting and foraging corridor for territorial and aerial species. Likely mostly retained within proposals. A section requires removal to provide pedestrian access to Tradescant Drive.	
h2a Other native hedgerow secondary code: 11 Hedgerow with trees	Two native hedgerows were located on Site. H1 was a defunct hedgerow, with no obvious signs of management within the structure. The hedgerow comprised dominant blackthorn, with frequent hazel and occasional sycamore, ash and holly. The understory was comprised of brambles, cleavers and dandelion. This was 269m in length. H2 was a mature hedgerow dominated by trees including ash, sycamore and hazel. The hedge comprised elder, ivy, hawthorn, blackthorn, sycamore and hazel. This was 73m in length.	N/A	N/A	Ecologically valuable. Provides a commuting and foraging corridor for a range of species, such as terrestrial mammals and bats, commuting and refuge for amphibians and reptiles and nesting habitat for birds. These are all likely to be retained and enhanced as part of the proposed Scheme.	
u1b Developed land sealed surface	A sealed road was present on Site along the western boundary	207.99	0.13	No ecological value.	

iv .

3.4 Great Crested Newt

3.4.1 Desk Study

i There are no recent records of great crested newts (GCN) within the Study Area, nor licence returns or pond surveys for GCN.

ii A total of four water bodies are present within 500m of the Site, as seen on Figure 3.

3.4.2 Field Survey

iii No features within the Site were identified that could support breeding GCN.

iv The dominant cropland habitat throughout the Site was observed as being negligible for terrestrial GCN suitability due to the open, exposed nature of the habitat with limited refuge opportunities.

v Due to the lack of records and suitable habitat GCN have been assigned a geographical scale of negligible nature conservation importance and are not considered further in this assessment. Precautionary working methods detailed within a Construction and Ecology Management Plan should be implemented during works to remove residual impacts.

3.5 Common Species of Reptile

i 'Common species of reptile' refers to common lizard, slow worm, adder and grass snake. The Site is located outside of the known range of smooth snake. While sand lizard are present at reintroduction sites in Kent, these are confined to the southern coast, and these species are not considered in this report.

3.5.2 Desk Study

ii There are two recent records of common lizard and grass snake within the Study Area. The closest / most relevant of these records is associated with a common lizard which is approximately 500m from the Site boundary. No records of adder were returned within the Study Area.

3.5.3 Field Survey

iii The predominant cropland habitat observed on Site was deemed to have limited suitability for reptiles due to the openness and lack of shelter throughout the Site. Boundary habitats, such as the hedgerows and grasslands offer limited potential for commuting, foraging and refuge and may be used by very low numbers of slow worm, common lizard or grass snake. No suitable adder habitat was recorded on Site.

iv Reptiles have assigned a geographical scale of negligible nature conservation importance at this site and are not considered further in this assessment. Precautionary working methods detailed within a Construction and Ecology Management Plan should be implemented during works to remove any risk of residual impacts.

3.6 Birds

3.6.1 Desk Study

i There are recent records for 15 notable bird species within the Study Area. These include one species listed on Annex I of the EC Birds Directive 1994, five species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), three Species of Principal Importance (SPI), six species on the Conservation Concern 5 (BoCC5) Red list (Stanbury, 2021) and six species on the BoCC5 Amber list. The records also include one species of bird, swift, that is a priority species in Kent listed on the Kent BAP.

3.6.2 Field Survey

ii The Site was noted for its suitability for ground nesting birds, such as skylarks, due to the predominance of arable cropland throughout the Site, as well as common and widespread birds within the boundary hedgerow habitats. A series of wintering bird and breeding bird surveys were undertaken in 2025. The wintering bird

surveys were cancelled following the second survey as bird scarers were recorded, which reduced the suitability for birds at that time of year while the crop established. No species of note were recorded during those surveys (results shown in Figures 4 and 5).

iii The breeding bird surveys were undertaken in spring/summer 2025. Species recorded were not of conservation note and comprised wood pigeon, magpie, robin, great tit, black bird, blue tit and other common garden birds. A dunnock was recorded in the south and house sparrow along the northern woodland belt. Whitethroat, song thrush, lesser black backed gull and wren were also noted (results shown in Figures 6, 7, 8, and 9).

iv Birds within the Application Site are therefore of Site nature conservation importance due to red and amber list species.

3.7 Badger

3.7.1 Desk Study

i There were no recent records of badger within the Study Area.

3.7.2 Field Survey

ii Evidence of badger was not recorded on Site or within 30m. However, two badger latrines were noted within the wider landscape (TN1 figure 2). Therefore, this species could access the Site for foraging.

iii As no evidence was recorded on Site, badgers have not been assigned a geographic conservation value. However, due to the mobile nature of this species as their ability to quickly excavate new setts, further recommendations are provided in Section 4 to prevent impacts to locally foraging individuals and reduce the risk of project delays from newly excavated setts.

3.8 Hazel Dormice

3.8.1 Desk Study

i No records of dormice were returned in the desk study. However, Kent is a known stronghold for this species and so absence cannot be assumed based upon a lack of records for this illusive species.

3.8.2 Field Survey

Tubes

ii A total of 20 tubes were placed in good habitat along the eastern section of the Site in the hedgerow shown in Figure 10). While 50 tubes are recommended for detection of dormice at a site, the vast majority of the Site was unsuitable habitat. Therefore, an additional 55 tubes were also installed in the wider landscape in good habitat to the northwest/west to increase detection in local hedgerows and woodlands. These were installed by Maisie Ryan who holds a Natural England dormouse licence. Tubes were checked every month over five visits from May – September as per guidance (Appendix 2 (Wells et al, 2025)).

iii No signs of dormice were recorded during surveys, and these are not given a geographic scale of nature conservation importance.

3.9 Bats

3.9.1 Desk Study

i There were numerous recent records of bats within the Study Area, relating to common pipistrelle roost (95 individuals 680m west), soprano pipistrelle roost (38 individuals 330m east), noctule roost (17 individuals 330m east), Leisler roost (72 individuals 330m east) and serotine roost (12 individuals 380m northeast).

3.9.2 Field Survey

Trees

ii Seventeen of the trees within the Application Site offered potential roosting opportunities for bats, four of which were classified as PRF-M (Potential Roosting Feature, Multiple Bats). The majority of the trees identified with PRF's were located along the northern boundary within a thin strip of woodland. Trees T3, T4 and T5, all identified as PRF-I (Individual Bats), were located along the western boundary and were considered individual trees within their own habitat classification (shown on Figure 11).

iii It is understood that the majority of the trees are due to be retained, however, there are proposals for a footpath/cycle connection in this northern corridor which may require facilitate clearance, likely to understory only. Owing to the outline design stage the final position of the path is To Be Confirmed as part of a detailed design and reserved matters application. Additionally, the environment in the area owing to dense tree understory and proximity of the trees to one another, it was advised that crossing point reviews were undertaken in these areas to ascertain activity/ use of the location.

Activity

iv Habitats on the Application Site, such as hedgerows with trees and a woodland strip, are considered suitable for foraging and commuting bats, with limited connectivity to the surrounding landscape. Therefore, the Application Site was assessed as having 'Low' value for commuting and foraging bats. Field surveys were conducted as per the methodology of the Bat Survey Guidelines (BCT, 2023).

v Transect surveys were undertaken along site Automated/static bat detector surveys. Static surveys include a minimum of five consecutive nights during April, July and September, and seasonal walked activity transects in spring, summer and autumn were undertaken across the Application Site.

vi The static detectors were positioned in habitats/areas which would likely be of importance to local bat populations or areas that would be significantly impacted by the Scheme, as shown on Figure 12. Static 1 was positioned along the southern Application Site boundary, east of the woodland, with static 2 recorded along the western boundary along the hedgerow.

vii The static detector surveys recorded relatively low numbers of bat passes, of mostly common and widespread species; common pipistrelle was the species recorded most frequently (90% of all bat passes), with occasional observations of soprano pipistrelle and Leisler's. Other species were also recorded in very low numbers including Nathusius's pipistrelle, noctule, myotis species, serotine and brown long-eared bat. July recorded the most bat passes for static location 1 to the south and September for static location 2 to the west.

viii Table 6 provides a summary of the static detector monitoring results. The figures in the table are the total passes for each species recorded by both static detectors across the entire monitoring period from April to September. Locations of the static detectors are shown on figure 12, and more detailed results are detailed in Appendix 3 tables 11 and 12.

Table 6: Static bat detector survey results summary

	Common Pipistrelle	Soprano Pipistrelle	Nathusius pipistrelle	Noctule	Leisler's	*Myotis* Sp.	Serotine	Brown *long*-eared
Total passes / species	9386	366	2	45	382	110	121	33

Night-time bat walkover surveys

ix Three night-time bat walkover surveys were scheduled in 2025 and undertaken on 23rd April, 9th July and 2nd September 2025. In general, activity at this site was very limited within these transect surveys with only occasional passes made. Bat species identified during the walked bat activity transects were dominated by the same species as detected by the static monitoring. The bat activity recorded during all of the transects was generally considered to be low in relation to habitat suitability and geographical location. These results can be seen in figures 13, 14 and 15. Coloured hotspots within these plans represent bat activity where the bats were heard but not seen.

x The survey evidence has found the majority of bats using the Application Site are common and widespread species (predominantly common pipistrelle). UK Bat Mitigation Guidelines (CIEEM 2023) classifies common pipistrelle, soprano pipistrelle and brown long eared as 'widespread', Myotis species and noctule as 'widespread in many geographies, but not as abundant in all, and Leisler's, and Nathusius' pipistrelle as 'rarer or restricted distribution'.

xi The overall levels of bat activity do not suggest high reliance on the Application Site.

xii It is noted that within the mitigation guidelines, myotis species are afforded differing conservation values, with species such as Daubenton's and natterers perceived to be less rare than whiskered and brants. The data analysis conducted within the site which accounts for all survey effort, confirms that a very low population of myotis is present and utilising the site. Due to the low population and the geographical context in which the Application Site is situated, it is concluded that bats are considered to be of Local nature conservation importance.

Night-time bat walkover survey 1

xiii The first transect survey was conducted in optimal conditions and in line with the current guidelines at the time of the survey (Collins, 2023). The survey commenced at 20:08 which was the same time as sunset and started with a 30-minute static assessment, with surveyors noting any activity at the start point. The entire survey recorded a single common pipistrelle at 21:19 at point 11 which was heard but not seen. No other bat calls were recorded, with the survey concluded at 22:08. Results shown in Figure 13.

Night-time bat walkover survey 2

xiv The second transect survey was conducted in optimal conditions and in line with the current guidelines at the time of the survey (Collins, 2023). The survey commenced at 21:15 which was the same time as sunset and started with a 30-minute static assessment, with surveyors noting any activity at the start point. The survey recorded two common pipistrelles at 22.43 and 22:48 and a single noctule at 22:43 at point 1 along the northern boundary. The survey concluded at 23:15. Results shown in Figure 14.

Night-time bat walkover survey 3

xv The third transect survey was conducted in optimal conditions and in line with the current guidelines at the time of the survey (Collins, 2023). The survey commenced at 19:12 which was the same time as sunset and started with a 30-minute static assessment, with surveyors noting any activity at the start point. Activity was increased during the final survey, with 5 common pipistrelles and 2 noctules recorded between 19:51 and 21:50. The survey experienced light rain at the start and end of the survey which was not deemed to be a

limitation as activity within the survey was unaffected. The survey was concluded at 22:12. Results shown in Figure 15.

Crossing Point Survey

xvi The northern woodland strip was subject to a crossing point assessment in relation to bats utilising the linear habitat and in order to seek to pinpoint if the cluster of trees did indeed contain likely roosts for bats noting the potential for a footpath / cycle connection. .The habitat was sectioned into three compartments to determine a thorough cross section of the habitat and usage by bats. The surveys were conducted over the summer and autumn period and comprised dusk and dawn reviews.

xvii The middle section (crossing point 2), contained 6 trees which recorded PRF's, with 3 PRF-I's (T13, T14, T15) and 3 PRF-M's (T12, T16, T17). However, all data collected across the 3 crossing points has been analysed fully to determine the importance and potential impacts of the works on the linear feature.

xviii The crossing point assessment of points 1-3 returned largely common and widespread species which are synonymous with tree roosting, including noctule and pipistrelle species. Results shown on Figures 16, 17, 18, and 19.

xix Particularly of note, on the dusk assessment, small number common pipistrelle were recorded immediately at sunset and equally at dawn Pipistrelle were recorded immediately prior to dawn at T13-15. These bats were associated with the northern edge of the site along the adjacent road side. However, despite having six surveyors and having Night Vision Aids at all points, due to the density of canopy and understory in particular, precise points of roosting could not be fully determined. However it is confidently concluded that one of these trees (T12-17) in the location will support a small day roost for common pipistrelle. Based on flight patterns and behaviours. Numbers were limited and so this is considered likely a mall day roost either of solitary individuals or up to a maximum of 5 bats. Roost fidelity in trees is also very low with tree roosts often persisting for limited time frames and bats interchange between multiple roost sites. Had a more sustained roost been present, flight lines and behaviours would have indicated as such and so the positive confirmation of a small roost is robust as a combination of factors described above. The species and roost type would be considered of low conservation significance as the species is common both locally and nationally and the loss of the roost type, in absence of mitigation would not cause an impact to the species favourable conversation status.

xx Further species recorded included myotis, which also have subspecies which prefer tree roosting. However, analysis of myotis calls is very difficult due to the similarity of sonograms and call parameters, making differentiating between the myotis species uncertain.

3.10 Terrestrial Invertebrates

3.10.1 Desk Study

i There are 75 recent records of notable[20] terrestrial invertebrates (moths) within the Study Area. The closest / most relevant of these records is associated with a ghost moth which is approximately 300m from the Site boundary.

[20] Notable terrestrial invertebrates are taken as principal species for the conservation of biodiversity listed under Section 41 of the Natural Environment and Rural Communities Act 2006; any invertebrate listed under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended); any invertebrate listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended); any invertebrate listed in the IUCN Invertebrate Red Data Book (1991); and any invertebrate listed under the Kent BAP.

3.10.2 Field Survey

ii The Site was noted for its low suitability to support a significant notable population of invertebrates due to the predominance of the cropland habitat, with limited floral diversity and intensive management practices. The hedgerows within the Scheme boundary and woodland present outside the Scheme boundary were noted for their higher suitability to support notable invertebrates.

iii As such, invertebrates within the Application Site are not given a geographic scale of nature conservation importance.

3.11 Other Notable Species

3.11.1 Desk Study

i There are 14 recent records of other notable species within the Study Area. The closest / most relevant of these records is associated with common toads and hedgehogs which were approximately 200m from the Site boundary.

3.11.2 Field Survey

ii The Site was noted for its suitability to hedgehogs due to the boundary hedgerows and grassland margins. However, these are likely not impacted by proposals and occurring in low densities.

iii As such, other notable species within the Application Site are assigned a negligible scale of nature conservation importance.

3.12 Future Baseline

i The management of the Application Site, which includes regular mowing of the grassland is unlikely to change between the time the surveys were undertaken and the time the development of the Application Site would take place. Therefore, the baseline described above in Sections 3.2 to 3.9 is not expected to change prior to development of the Application Site.

3.13 Summary of Nature Conservation Importance

i Table 7 summaries the features that have been recorded in the Study Area and their nature conservation importance.

Table 7: Summary of Nature Conservation Importance

Ecological Feature	Geographical Scale of Nature Conservation Importance
Habitats	Site
Birds	Site
GCN, Reptiles, Other notable species	Negligible
Bats	Local

4 IMPACT ASSESSMENT, AGREED MITIGATION MEASURES AND SIGNIFICANCE OF RESIDUAL EFFECTS

i This Section characterises the impacts of the Scheme on IEFs during the construction and operation phases, sets out agreed avoidance and mitigation measures, and assesses the significance of the residual effects (both positive and negative) of the Scheme on these features. Where significant residual effects will occur, appropriate compensation measures are identified to offset those effects. Enhancements agreed by the Applicant are set out in Section 5.

ii The Applicant has agreed that the general mitigation measures identified in Section 4.1 onwards will be incorporated into the detailed design proposals for the Scheme and implemented as part of the overall development of the Application Site.

4.1 Habitats

4.1.1 Construction Impacts and Mitigation

i There is a risk that during construction, impacts to trees or woodland bordering the Site could occur through deposition of dust or spillage of pollutants such as engine oil. To address this risk, standard measures to prevent impacts from pollution through construction related activities would be implemented and root protection areas adhered to.

ii Development of the Scheme, along with offsetting within the district would result in the loss of 1.167ha of modified grassland, 14.346ha of non-cereal crops, 0.0175ha of other broadleaved woodland, and 0.1002ha of trees. 0.4820ha of trees would be retained. These habitats collectively are of Site nature conservation importance and do not support any notable or protected species. Furthermore, 0.78 units of native hedgerow with trees and 1.08 units of native hedgerow were recorded, of which 0.23 units of native hedgerow with trees are lost and 0.23 unit of native hedgerow are also to be lost.

iii Habitats lost will be replaced by 0.509ha of modified grassland, 0.3611 ha of other neutral grassland, 0.3836 ha of mixed scrub, 0.2124ha of allotments, 0.3137 of sustainable urban drainage features and 0.7981 ha of trees within the Application Site as part of the landscape planting. Additional habitats include developed areas which will not score/contribute towards the net gain assessment. Creation of additional hedgerows have also be proposed, with 0.34 units of hedgerow with trees and 0.50 units of native hedgerows due to be planted. The proposed Scheme is due to deliver a 20.55% net gain of biodiversity area units and 20.28% net gain in hedgerow linear units, and therefore would be in accordance with national legislation (Environment Act, 2021) as well as national (National Planning Policy Framework) and local planning policies (The Gravesham Local Plan Core Strategy adopted in September 2014 and the Kent Biodiversity Strategy, 2020).

4.1.2 Operation Impacts and Mitigation

iv No impacts are expected occur to the habitats during the operation of the Scheme.

4.1.3 Residual Effects and Compensation Measures

v Creation of habitats within the Application Site and offsetting site will deliver a net gain for biodiversity, significant at the Site scale.

4.2 Birds

4.2.1 Construction Impacts and Mitigation

i Clearance of vegetation during the nesting bird season (taken to be March to August, though with some seasonal and species variations) would risk damaging or destroying active birds' nests. To prevent this, clearance of vegetation would be undertaken outside of the nesting bird season. If this isn't possible, a check

of vegetation to be cleared would be undertaken within 24 hrs of the clearance taking place. If any active birds' nests were discovered, they would be left in place with a buffer of vegetation surrounding them until such time as the young had fledged or the nest was no longer active.

4.2.2 Operation Impacts and Mitigation

ii No impacts are expected occur to birds during the operation of the Scheme.

4.2.3 Residual Effects and Compensation Measures

iii No significant residual effect would occur to birds, and no compensation is proposed.

4.3 Badgers

4.3.1 Construction Impacts and Mitigation

i No setts were recorded within 30m of the Site. It is recommended that an updated badger survey is undertaken within 3 months prior to works commencing on site to check for newly created setts. To minimise the risks to any badger traversing the Site:

- Night work should be avoided as this is when badgers are most likely to be active. Adherence to the
- If any fresh digging is observed, notify an ecologist immediately and leave a 30 m buffer around the area until an assessment can be made.
- Any pipework >20cm to be capped off at the end of the day.
- Excavations/trenches will require a ramp.
- In the extremely unlikely event that a badger is directly sighted, it must not be approached and must be allowed to leave the works zone unimpeded.
- movement.

4.3.2 Operation Impacts and Mitigation

ii No impacts are expected occur to badgers during the operation of the Scheme.

4.3.3 Residual Effects and Compensation Measures

iii No significant positive effect would occur to badgers following creation of an orchard to the north of the setts and enhancement of grassland on Site would increase foraging potential for this species.

4.4 Bats

4.4.1 Construction Impacts and Mitigation

i A small area of clearance within the woodland along the northern boundary is currently scheduled within the Scheme, to facilitate a potential footpath / cycleway access. It is anticipated that some tree removal will be required to facilitate this, including some PRF-I trees. However precisely which trees will be determined at the detailed design phase as part of a reserved matters application. The surveys have confirmed a probable day roost for common pipistrelle in Tree 12-17. These trees represent mature landscape features and Important Ecological Features which can and should be retained. Whilst some facilitative clearance may be required for the new footpath connection, this should be restricted and avoid the mature trees. Where detailed design confirms any tree removal is needed, update assessments pursuant to a reserved matters application will be required. It should be noted that roost fidelity in trees for small day roosts of this nature is very low and so presence / absence survey in this manner has limited expiration date. As such for this appraisal it is confirmed as a roost at this time but this should be followed by in date assessments as part of that detailed design phase and where applicable European Protected Species License (EPSL) be sought post approval of a reserved matters application. Such a roost can readily be accommodated for in a mitigation method appraisal and alternative means of roost provision provided within the retained woodland corridor by means of roost boxes

within the trees. As further enhancements integrated bat boxes within the dwellings along this northern edge should be considered.

ii For any trees identified as PFR-I which require felling, a PMW document will be required detailing specific mitigation measures re timing of soft felling activities to avoid potential risks. PRF inspection surveys via areal inspection will be required by a suitably licensed ecologist at the time of the works. Prior to any roosting features being removed, alternatives will be installed on retained trees at a minimum of 1:1 ratio.

iii Indirect impacts to potential roosts in suitable trees could occur during construction as a result of increased noise, vibration and lighting. Therefore, precautionary working practices will be followed to minimise the risk of causing disturbance to bats that could be present in tree roosts at the time. These 'best practice' protocols will be provided within a CEMP and will include the following:

- All retained trees with roosting potential will be protected during construction through the implementation of a sufficient buffer zone (minimum 10m from the root protection zone of the tree), which will be observed via fencing.
- Artificial lighting utilised during construction would have the potential to cause displacement impacts to foraging and commuting bats, where directed towards hedgerows and trees. Efforts will be made to minimise the effects of increased artificial lighting upon retained habitats, particularly the retained hedgerows and trees, and night works will not be undertaken. If avoidance of lighting is not possible, any new lighting will follow the guidance set out in Bats and Lighting in the UK (BCT and ILP, 2023) and will be focused on the works area only and away from retained hedgerows and trees. A sensitive lighting scheme will be implemented and enforced via a CEMP. Lighting proposals will consider the following:
    - Avoid nocturnal construction
    - Avoid lighting where possible- particularly near any retained hedgerow and trees;
    - Install lamps and the lowest permissible density;
    - Lamps should be positioned to direct light to avoid upward spill onto any green corridors that could be used
    - by commuting bats or features with bat roost potential;
    - LED lighting – with no/low UV component is recommended;
    - Lights with a warm colour temperature – 3000K or 2700K have significantly less impact on bats;
    - Light sources that peak higher than 550nm also reduce impacts to bats; and
    - The use of timers and dimmers to avoid lighting areas of the Application Site all night is recommended

4.4.2 Foraging and Commuting Bats

iv The areas and habitats within the Application Site where most bats were observed foraging included around the woodland edge and linear boundaries (including hedgerows). As the majority of these features will be retained, impacts from the Scheme upon foraging bats will be minimal. However, to minimise disruption to foraging and commuting bats that could be using these habitats during construction, as described above for roosting bats, any artificial lighting (if required) will be carefully positioned away from these areas / habitats.

4.4.3 Operation Impacts and Mitigation

v No impacts are expected occur to bats at operation phases. The northern section of the woodland was determined a hotspot for activity for common and widespread species during the 2025 surveys with a small section due to be removed. However, it is determined that a sensitive lighting scheme is incorporated within the design, to ensure no artificial light splay impacts local bat populations following completion of the Scheme. The small section of woodland to be removed is unlikely to cause any impacts on commuting and foraging bats, provided no artificial light splays over the linear feature. The lighting scheme will be required to ensure that any artificial light is incorporated in line with The Institution of Lighting Professionals (ILP) Guidance Note GN08/23.

4.4.4 Residual Effects and Compensation Measures

vi The bat mitigation guidelines (2023) confirm a case study (27) which created PRF's suitable for bats to utilise as roosts within retained sections of woodland and retained trees. The case study confirmed success with common pipistrelle using the created PRF's over 5 seasons. It is therefore concluded that the retained section of woodland along the northern boundary must allow for the creation of suitable roosts, with characteristics suitable for roosting (knot holes). Every identified feature must be replaced in the same quantity to ensure no loss of roosting opportunity occurs at a ration of 1:1.

4.4.5 Cumulative Impact Assessment

vii A second site to the west of boundary of the Application Site is likely to also be brought forward by Richborough Estates Limited in due course. This Site is also covered within a separate EcIA (RammSanderson, 2025). Both schemes deliver a net benefit for biodiversity. It is further concluded that as additional habitats are to be created, deemed suitable for bats, including additional tree planting, SUDs and parkland, bats will be compensated for any loss of habitat proposed within the Scheme.

viii The analysis of the data confirms a nationally important population when considering table 3.3 of the Bat Mitigation Guidelines for the southeast of England, with a single rarer species recorded. Leisler are known to roost in trees. It is therefore concluded that provided the case study noted within residual effects and compensation measures (Case study 27 of the bat mitigation guidelines) in relation to the trees, suitable compensation will be provided for tree dwelling species. It is also concluded that 25% of the proposed houses must include bat roosting enhancements which are to be integrated within the structures to accommodate other species of bats.

5 BIODIVERSITY NET GAIN

i The On-site baseline for the Application Site is 38.83 habitat units, 1.94 hedgerow units and 0 watercourse units. Accounting for all the habitat loss and creation detailed above in Section 4.1, the Scheme alone would result in a net loss of 10.32 habitat units, equivalent to a 26.58% loss within the Application Site. A net gain for hedgerows can be achieved on site, with an additional 0.24 units to be delivered, representing a 12.49% net gain.

ii The proposed baseline for offsetting site is calculated at 7.32 habitat units, 0 hedgerow units and 0 watercourse units. Accounting for the habitat creation and enhancements detailed above in Section 4.2, the Off-site net change would be an increase of 23.49 habitat units, equivalent to a 221.08% gain.

iii Overall, with the habitat creation within the Application Site and the Off-site habitat creation and enhancements, the Scheme would result in a net gain of 5.85 habitat units, equivalent to a 15.08% gain.

iv Figures 20 and 21 show the biodiversity baseline and proposed in terms of habitat units.

v A copy of the Statutory Biodiversity Metric for the Scheme has been submitted as part of the planning application for the Scheme.

6 CONCLUSION

i This EcIA is based on a desk study and ecological surveys undertaken between February and September 2025. The scope of the surveys was based on the EZoI of the Scheme and included an extended Phase 1 habitat survey following UKHabs methodology, habitat condition surveys, dormouse survey, wintering birds surveys, breeding birds surveys, ground level tree assessments of potential bat roost features in trees and a badger survey. The ecological features present within the Survey Area are shown in Figures 2, 3, 4 and 5. Once all relevant available information was obtained, the significance of effects (both positive and negative) on IEFs was assessed.

ii The Applicant has agreed that the avoidance, mitigation, and compensation measures identified in Section 4 and 5 above will be incorporated into the detailed design proposals for the Scheme and implemented as part of the overall development of the Application Site. The Scheme has maximised opportunities to incorporate and enhance biodiversity within the proposals wherever possible.

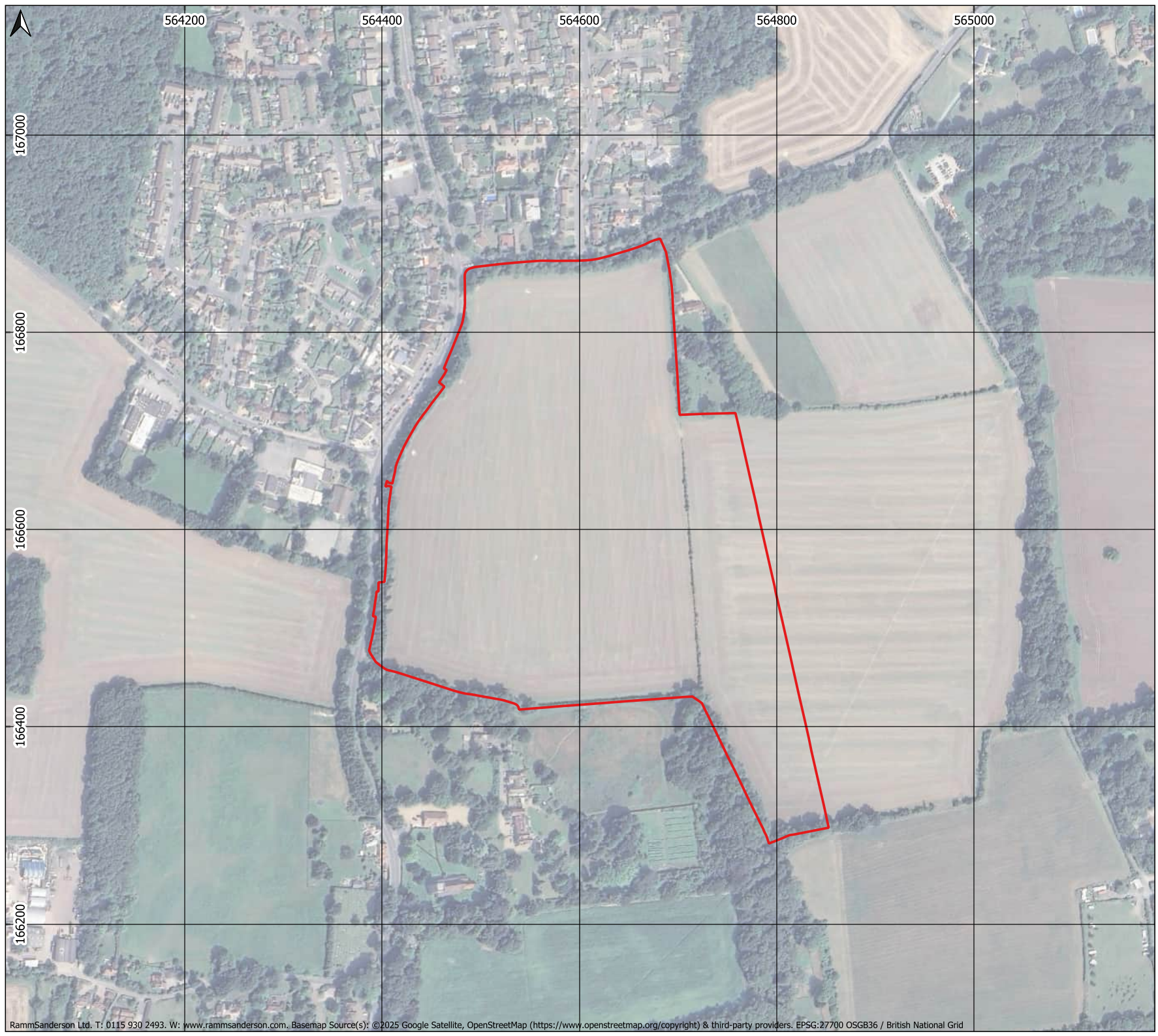
iii Impacts from the construction or operational phases of the Scheme are predicted to result in none of the following significant negative residual effects:

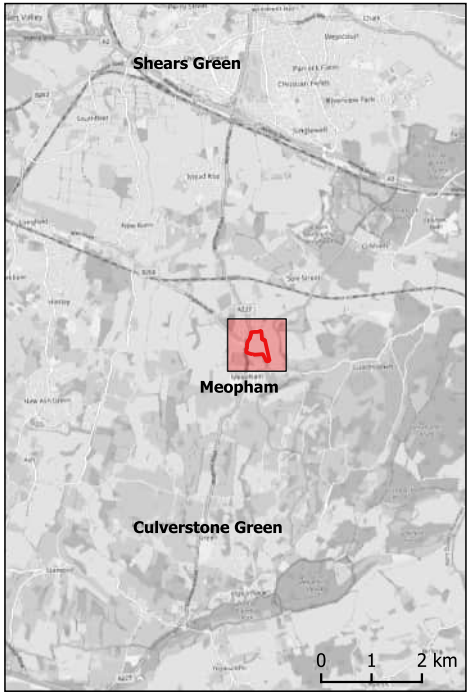
- Undermine the conservation objectives or condition of designated sites and their features of interest;
- A change in ecosystem structure and function; and,
- Threaten the conservation status of undesignated habitats or protected and notable species.

iv Overall, the Scheme would result in a biodiversity net gain of 10.44% habitat units and 13.28% for hedgerows.

v Taking avoidance, mitigation and compensation measures into account, the Scheme conforms in respect of biodiversity to The Environment Act 2021 requirement for mandatory biodiversity net gain and the National Planning Policy Framework (NPPF) Section 15 (Conserving and enhancing the natural environment).

7 FIGURES





RammSanderson

Title: Site Context Plan - Site A	
Project: Wrotham Road, Meopham	
Client: Richborough Estates Limited	Richborough Estates
Date: 04/11/2025	Fig: Author: JW
A4 Scale: 1:5000	ID: RSE_8996c _STC_1125_V2R1

Key

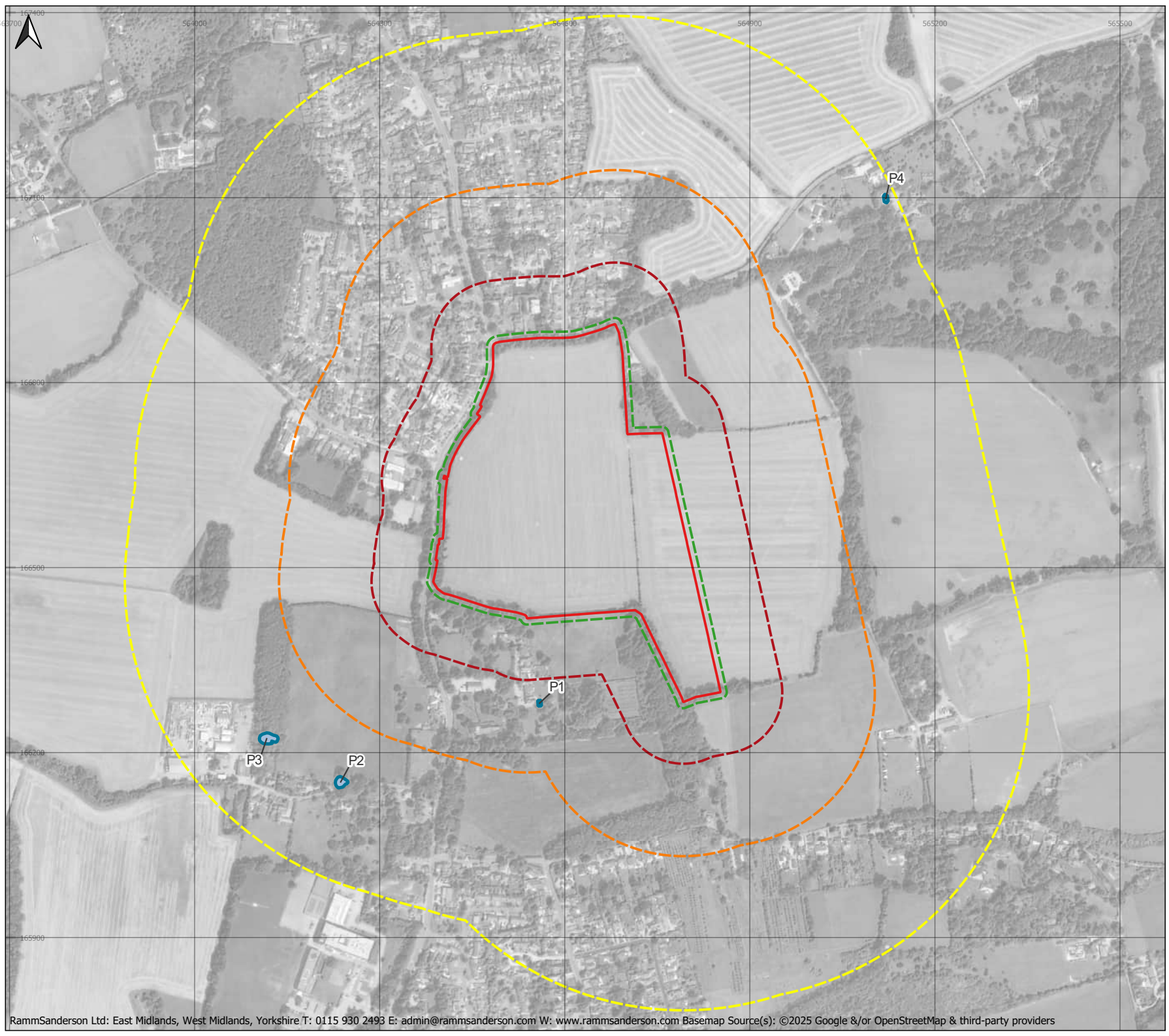
- Site Boundary
- Site Boundary (Line)
- c1d: Non cereal crops
- g4: Modified grassland
- u1b: Developed land; sealed surface
- w1g: Other broadleaved woodland
- h2a: Native hedgerow
- u1e: Built linear features - fence
- g4 200: Tree (Large urban tree)
- g4 200: Tree (Medium urban tree)
- g4 200: Tree (Small urban tree)
- Target Notes:
  TN1: Badger latrine

RammSanderson

Title: UKHabs Habitat Plan - Site A	
Project: Wrotham Road, Meopham	
Client: Richborough Estates Limited	
Date: 04/11/2025	Fig: Author: JW
Habitat MMU: 25m²	Linear MMU: 5m (length)
A4 Scale: 1:3200	ID: RSE_8996c_UKH_1125_V2R1

EPSG:27700 OSGB36 / British National Grid

RammSanderson Ltd: East Midlands, West Midlands, Yorkshire T: 0115 930 2493 E: admin@rammsanderson.com W: www.rammsanderson.com



Key

- Site Boundary
- 10m Buffer
- 100m Buffer
- 250m Buffer
- 500m Buffer
- Pond Location

Pond	Area (m2)
P1	49.3
P2	252.9
P3	398.7
P4	74.4

RammSanderson

Title: Waterbody Plan - Site A

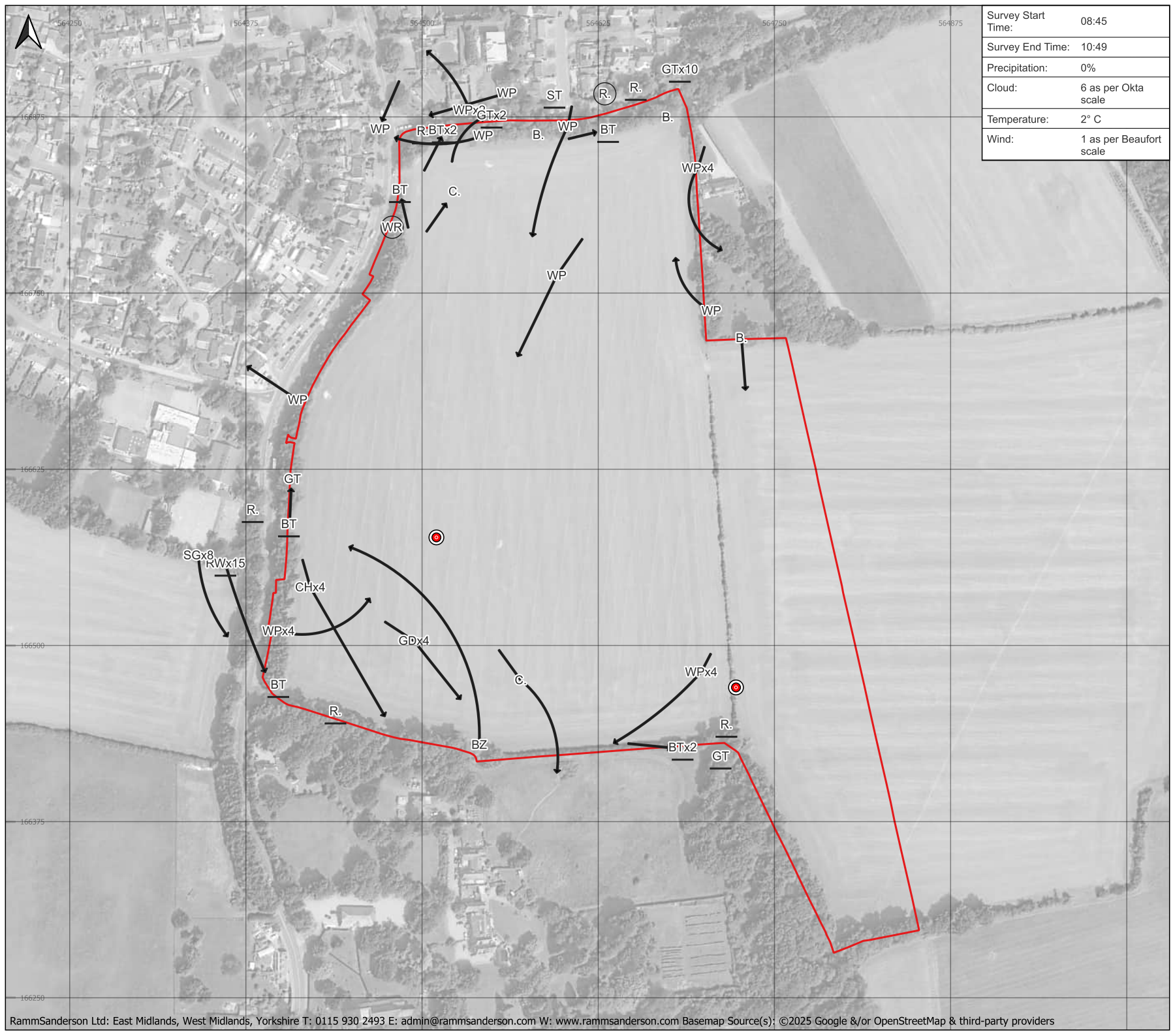
Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 04/11/2025 Fig: Author: JW

A4 Scale: 1:8000 ID: RSE_8996c_WBY_1125_V2R1

EPSG:27700 OSGB36 / British National Grid



Survey Start Time:	08:45
Survey End Time:	10:49
Precipitation:	0%
Cloud:	6 as per Okta scale
Temperature:	2° C
Wind:	1 as per Beaufort scale

Key

- Site Boundary
- Flying in and landing
- Flying away (from being perched)
- Flying over
- Call
- Alarm Call
- Song
- Foraging/Circling Behaviour
- Bird Scarer

sp_abbrev	species
B.	Common Blackbird
BH	Black-headed Gull
BT	Blue Tit
C.	Carrion Crow
MG	Magpie
R.	European Robin
WP	Common Woodpigeon
WR	Wren

RammSanderson

Title: Wintering Bird Survey Plan
Survey 1 Site A- 21/01/2025

Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: YH

A4 Scale:1:3500 ID: RSE_8996_WBS1A_1125_V3R1

EPSG:27700 OSGB36 / British National Grid

Survey Start Time:	13:40
Survey End Time:	16:30
Precipitation:	2
Cloud:	8 as per Okta scale
Temperature:	8° C
Wind:	2 as per Beaufort scale

Key

- Site Boundary
- Site Boundary (line)
- Offsite Boundary
- Flying in and landing
- Flying away (from being perched)
- Flying over
- Call
- Song
- Agressive encounter

sp_abbrev	species
B.	Common Blackbird
BT	Blue Tit
BZ	Common Buzzard
C.	Carrion Crow
GH	Common Grasshopper Warbler
GO	European Goldfinch
GT	Great Tit
HS	House Sparrow
M.	Mistle Thrush
MG	Magpie

RammSanderson

Title: Wintering Bird Survey Plan
Survey 2 Site A - 26/02/2025

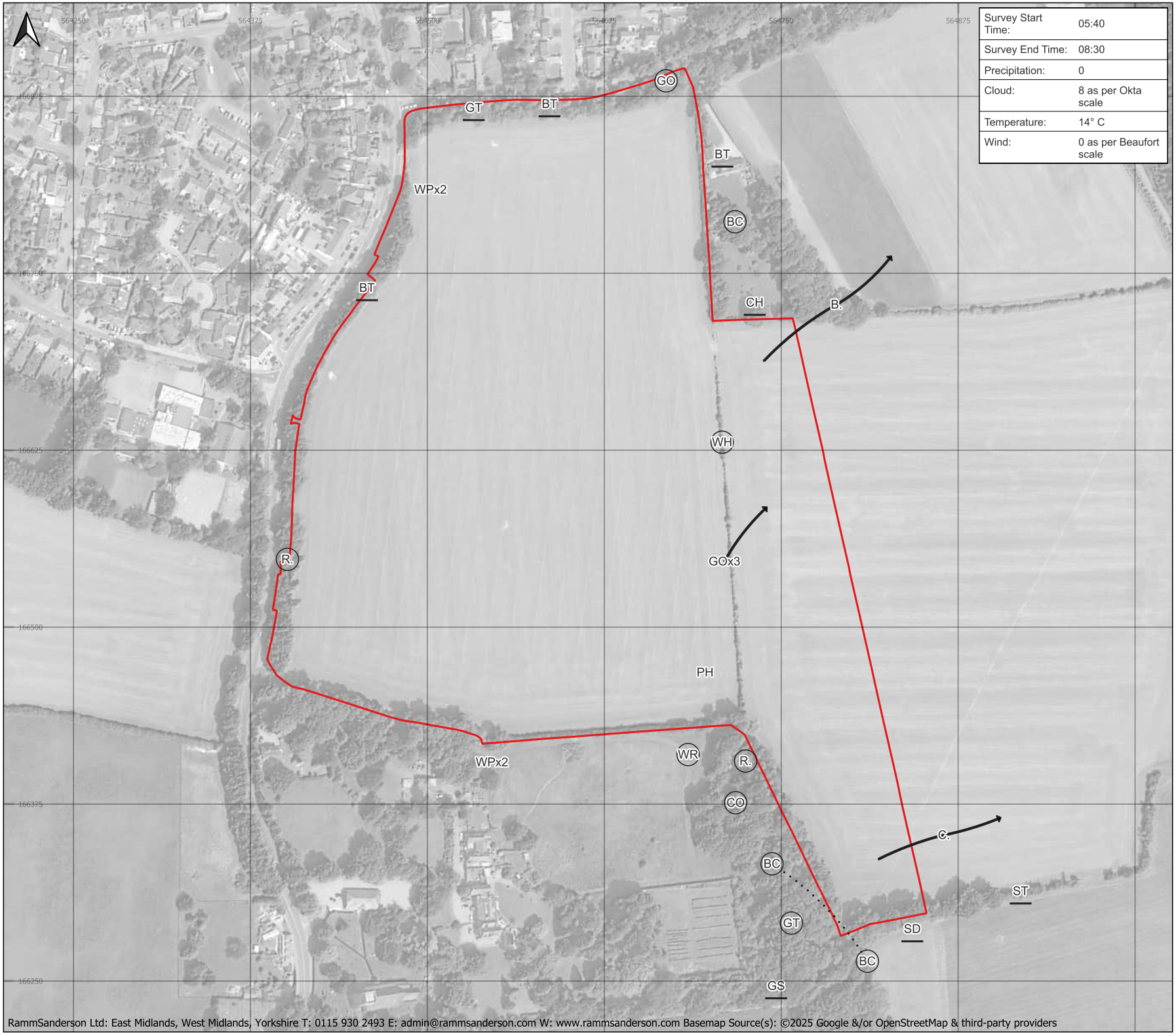
Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: EN / YH

A4 Scale:1:3500 ID: RSE_8996_WBS2A_1125_V3R1

EPSG:27700 OSGB36 / British National Grid



Survey Start Time:	05:40
Survey End Time:	08:30
Precipitation:	0
Cloud:	8 as per Okta scale
Temperature:	14° C
Wind:	0 as per Beaufort scale

Key

- Site Boundary
- Flying away (from being perched)
- Flying over
- Two separate birds singing
- Call
- Song

sp_abbrev	species
B.	Common Blackbird
BC	Blackcap
BT	Blue Tit
C.	Carrion Crow
CH	Chaffinch
CO	Common Coot
GO	European Goldfinch
GS	Great Spotted Woodpecker
GT	Great Tit
PH	Common Pheasant
R.	European Robin
SD	Stock Pigeon
ST	Song Thrush
WH	Common Whitethroat
WP	Common Woodpigeon
WR	Wren

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Title: Breeding Bird Survey Plan - Survey 1 - 30/04/2025

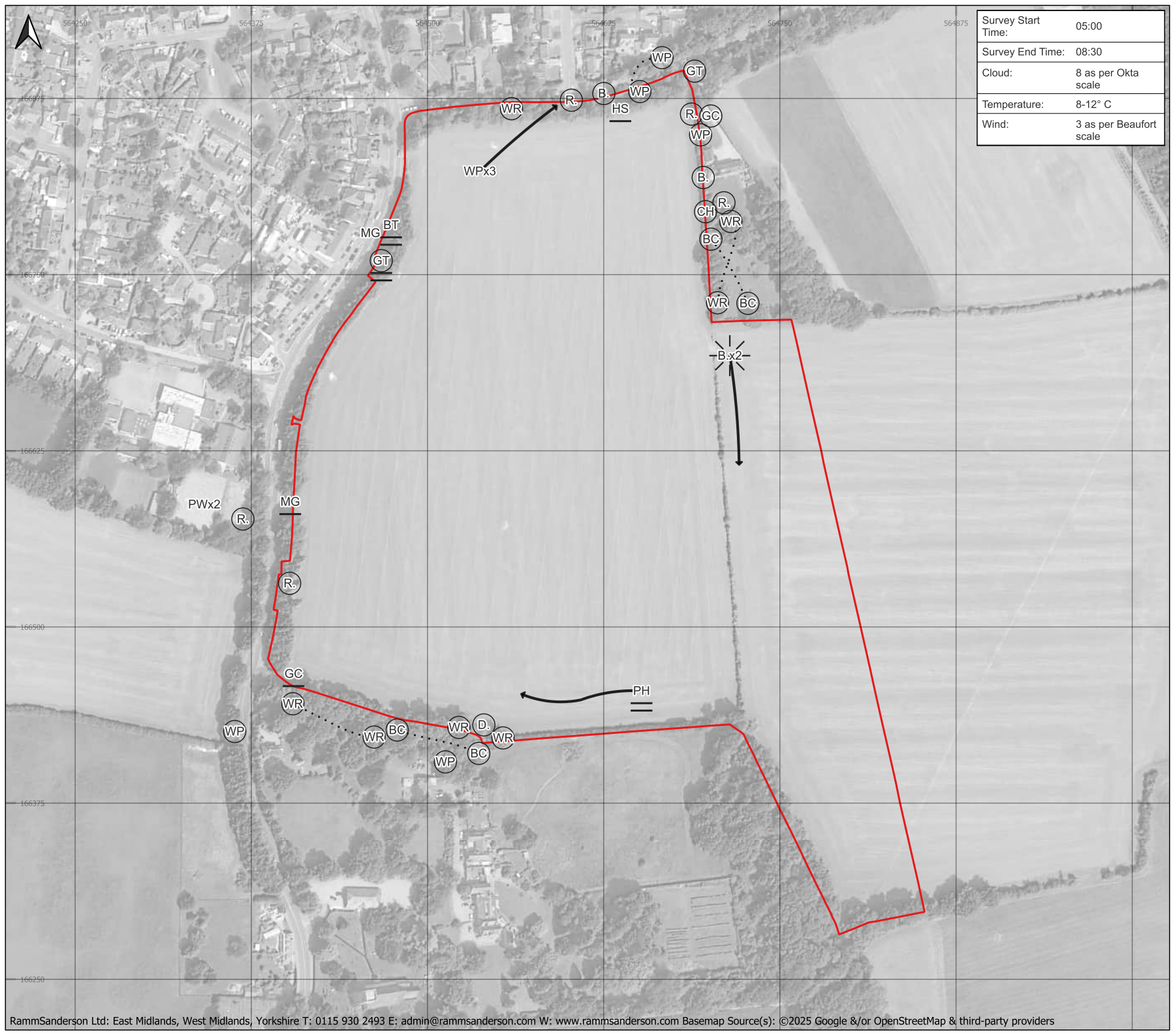
Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: YH

A4 Scale:1:3500 ID: RSE_8996_BBS1_1125_V3R1_Site A

EPSG:27700 OSGB36 / British National Grid



Survey Start Time:	05:00
Survey End Time:	08:30
Cloud:	8 as per Okta scale
Temperature:	8-12° C
Wind:	3 as per Beaufort scale

Key

- Site Boundary
- S. → Flying away (from being perched)
- S. ··· S. Two separate birds singing
- — Call
- = Alarm Call
- ○ Song
- ✳ Agressive encounter

sp_abbrev	species
B.	Common Blackbird
BC	Blackcap
BT	Blue Tit
CH	Chaffinch
D.	Dunnock
GC	Goldcrest
GT	Great Tit
HS	House Sparrow
MG	Magpie
PH	Common Pheasant
PW	Pied Wagtail
R.	European Robin
WP	Common Woodpigeon
WR	Wren

RammSanderson

Title: Breeding Bird Survey Plan - Survey 2 - 15/05/2025

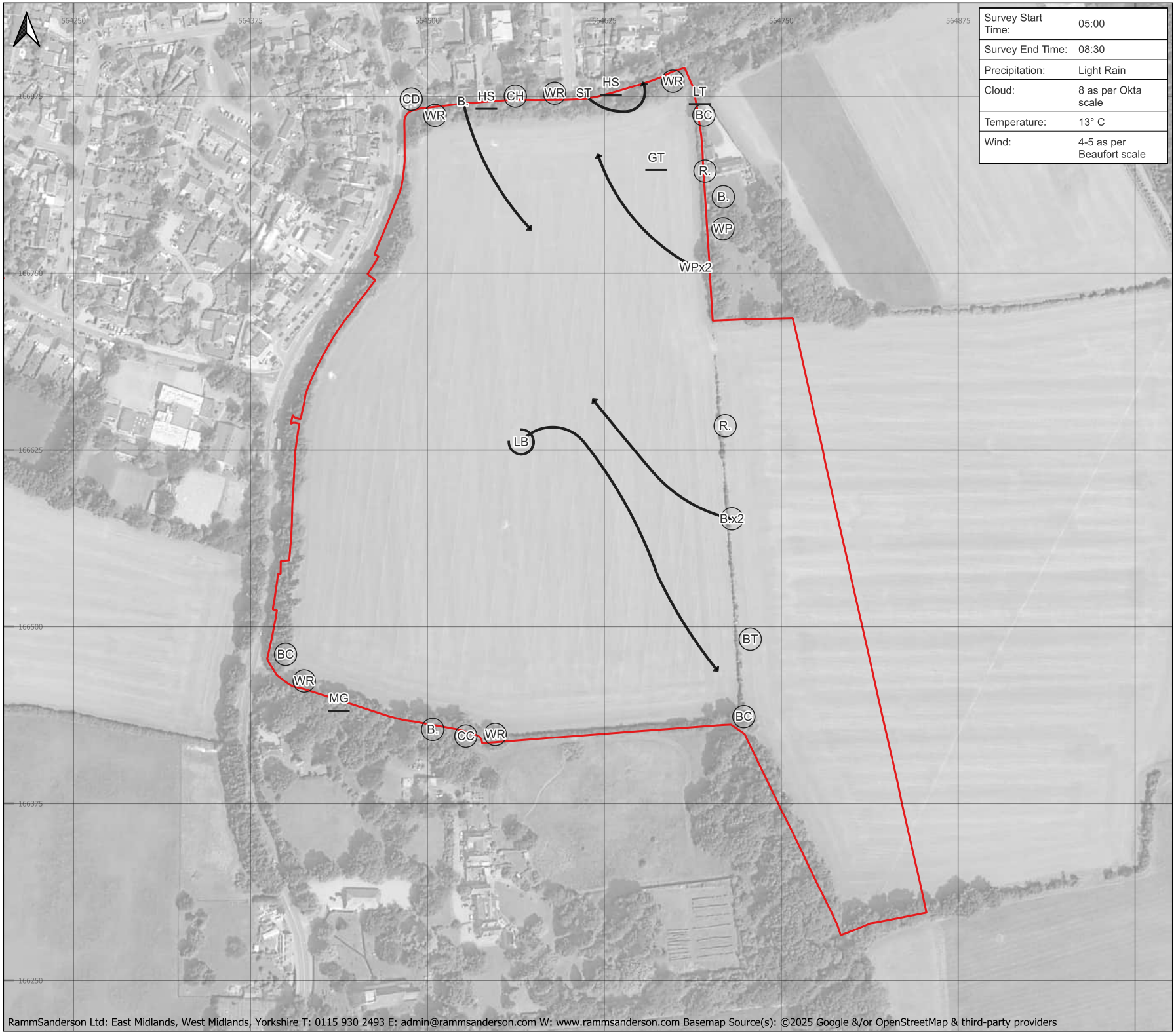
Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: YH

A4 Scale:1:3500 ID: RSE_8996_BBS2_1125_V3R1_Site A

EPSG:27700 OSGB36 / British National Grid



Survey Start Time:	05:00
Survey End Time:	08:30
Precipitation:	Light Rain
Cloud:	8 as per Okta scale
Temperature:	13° C
Wind:	4-5 as per Beaufort scale

Key

- Site Boundary
- Flying away (from being perched)
- Call
- Song
- Foraging/Circling Behaviour

sp_abbrev	species
B.	Common Blackbird
BC	Blackcap
BT	Blue Tit
CC	Common Chiffchaff
CD	Eurasian Collared Dove
CH	Chaffinch
GT	Great Tit
HS	House Sparrow
LB	Lesser Black-backed Gull
LT	Long-tailed Tit
MG	Magpie
R.	European Robin
ST	Song Thrush
WP	Common Woodpigeon

RammSanderson

Title: Breeding Bird Survey Plan - Survey 3 - 29/05/2025

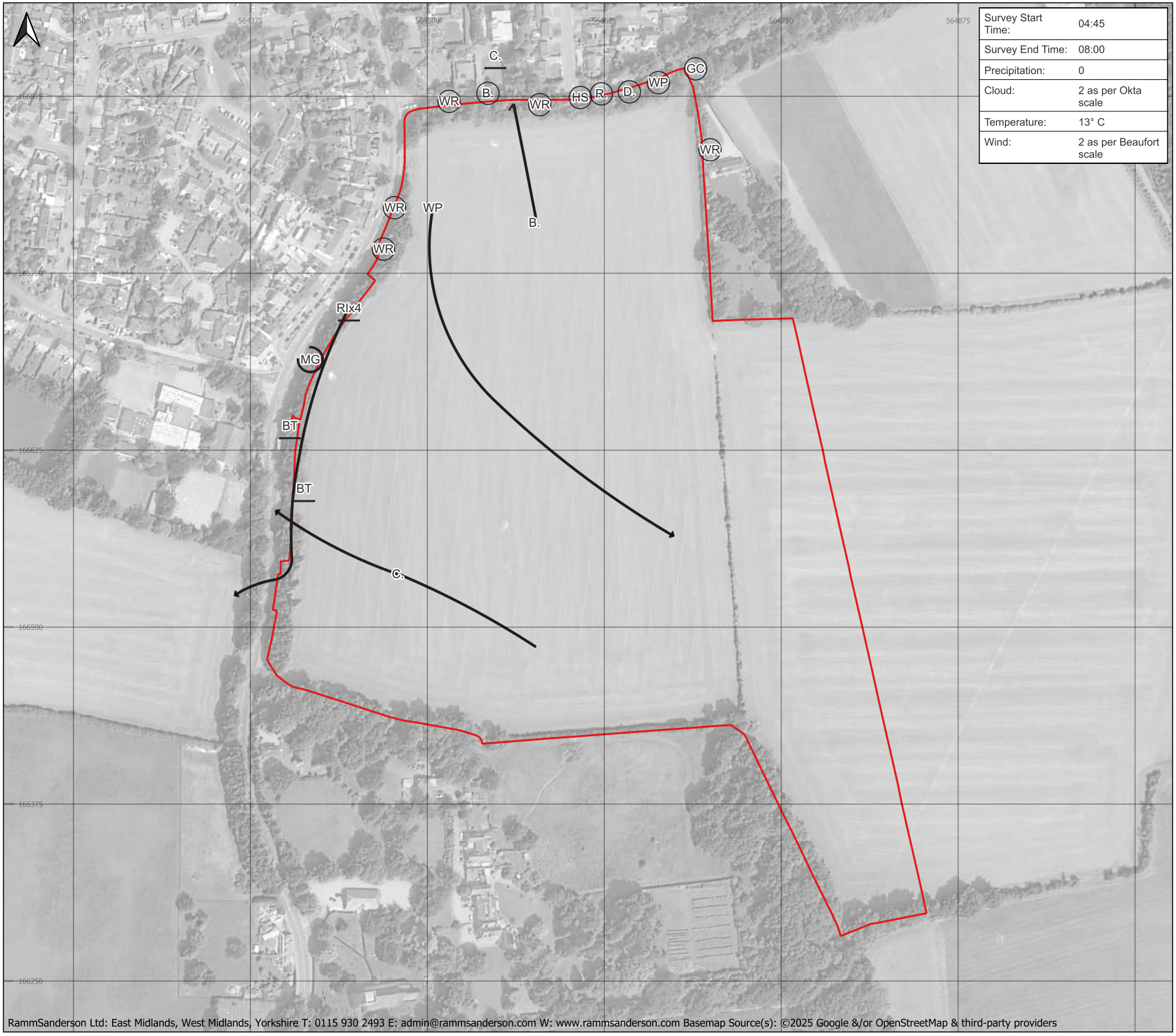
Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: YH

A4 Scale:1:3500 ID: RSE_8996_BBS3_1125_V3R1_Site A

EPSG:27700 OSGB36 / British National Grid



Survey Start Time:	04:45
Survey End Time:	08:00
Precipitation:	0
Cloud:	2 as per Okta scale
Temperature:	13° C
Wind:	2 as per Beaufort scale

Key

- Site Boundary
- Flying away (from being perched)
- Flying over
- Call
- Song
- Foraging/Circling Behaviour

sp_abbrev	species
B.	Common Blackbird
BT	Blue Tit
C.	Carrion Crow
D.	Dunnock
GC	Goldcrest
HS	House Sparrow
MG	Magpie
R.	European Robin
RI	Ring-necked Parakeet
WP	Common Woodpigeon
WR	Wren

RammSanderson

Title: Breeding Bird Survey Plan - Survey 4 - 12/06/2025

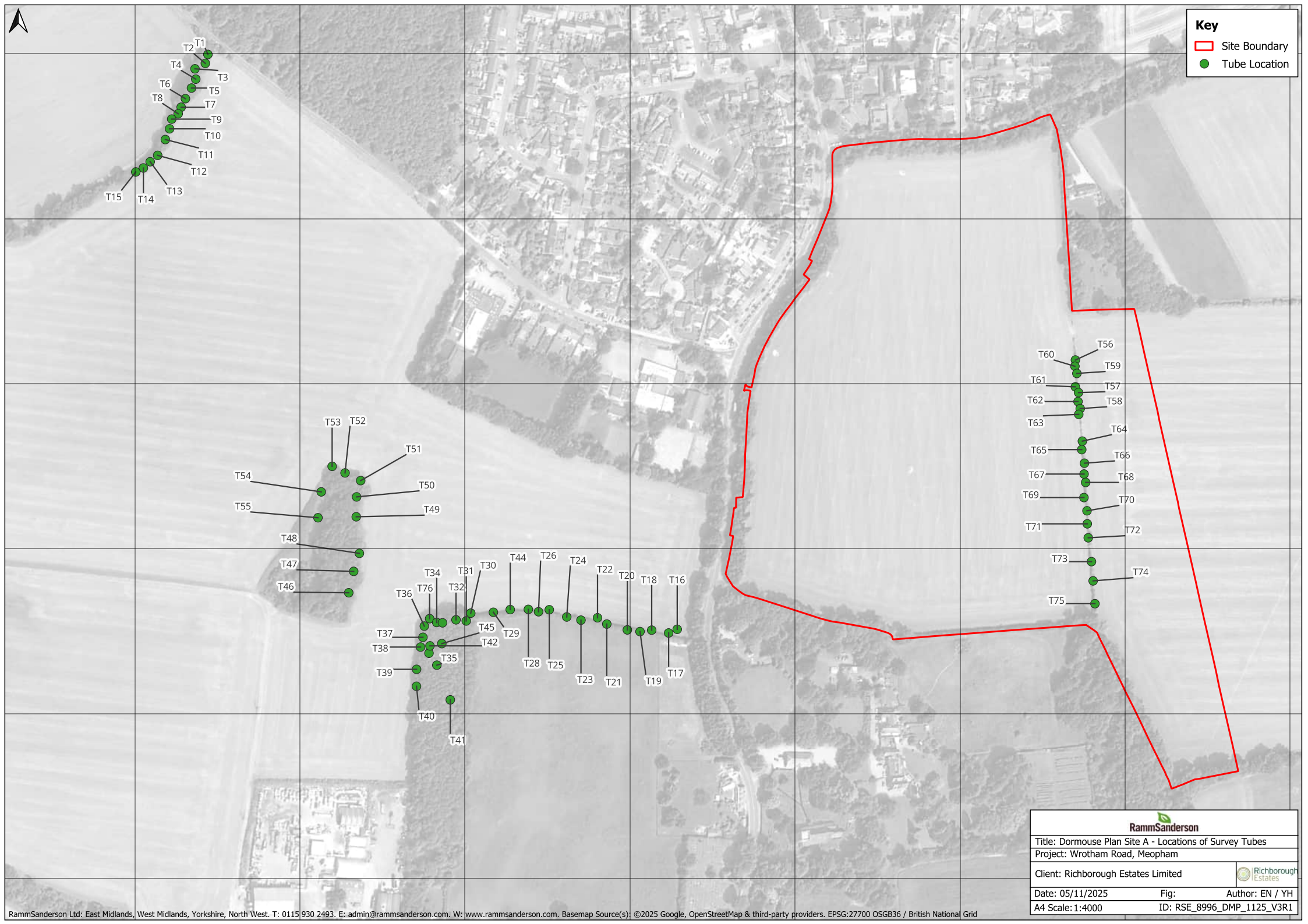
Project: Wrotham Road, Meopham

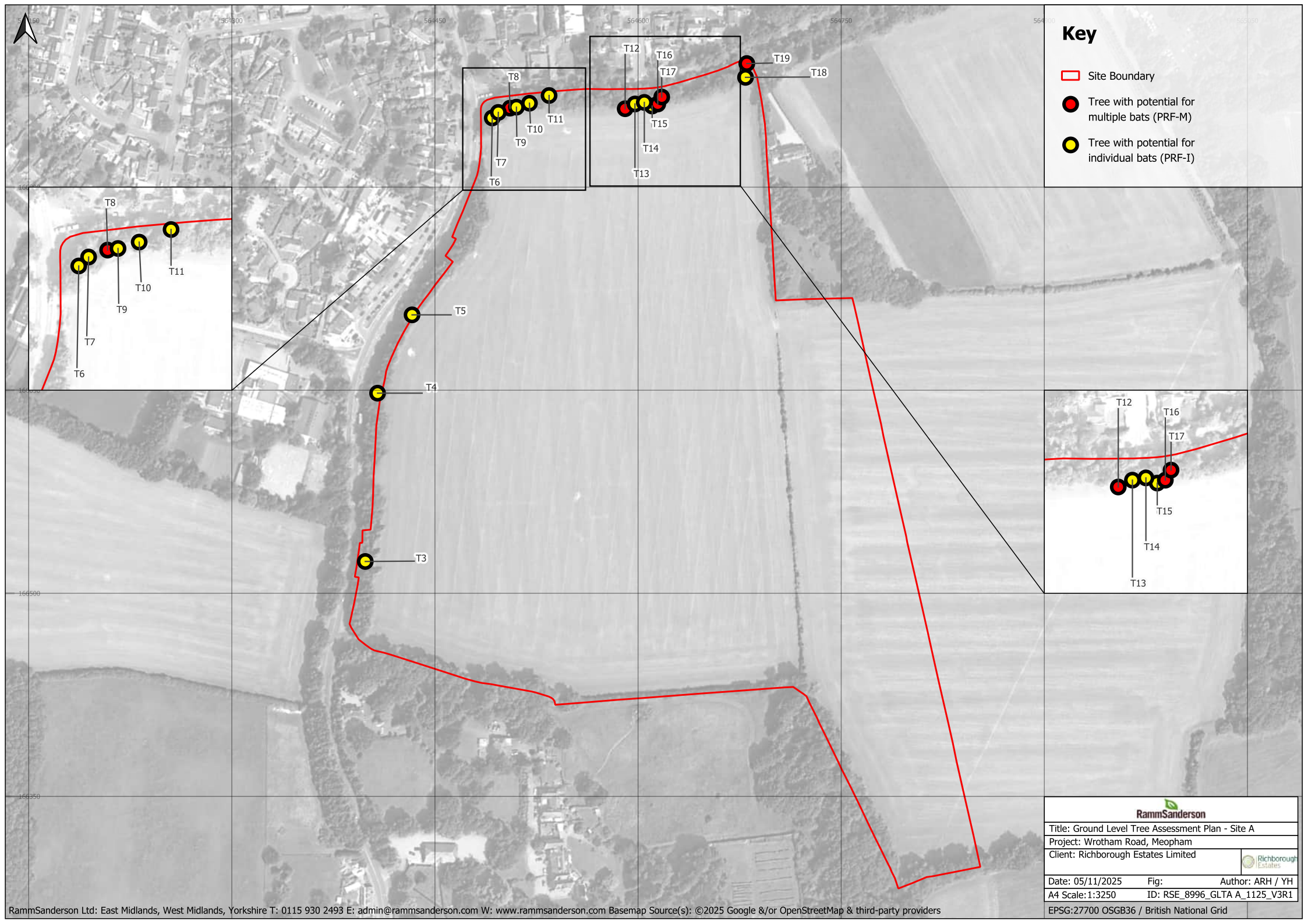
Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: YH

A4 Scale:1:3500 ID: RSE_8996_BBS4_1125_V3R1_Site A

EPSG:27700 OSGB36 / British National Grid





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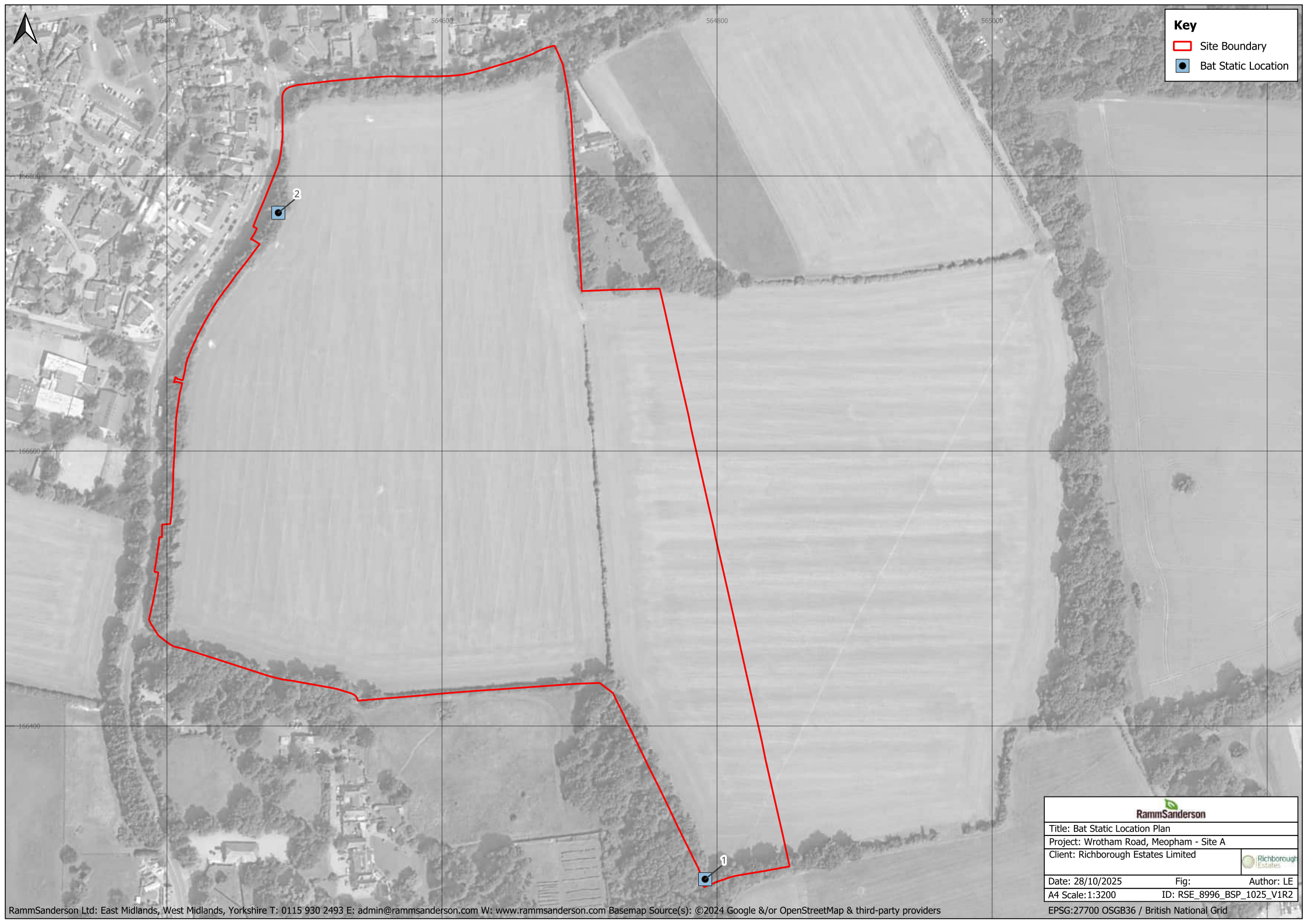
Title: Ground Level Tree Assessment Plan - Site A	
Project: Wrotham Road, Meopham	
Client: Richborough Estates Limited	
Date: 05/11/2025	Fig: Author: ARH / YH
A4 Scale:1:3250	ID: RSE_8996_GLTA A_1125_V3R1
EPSG:27700 OSGB36 / British National Grid	



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Title: Bat Static Location Plan	
Project: Wrotham Road, Meopham - Site A	
Client: Richborough Estates Limited	
Date: 28/10/2025	Fig: Author: LE
A4 Scale:1:3200	ID: RSE_8996_BSP_1025_V1R2

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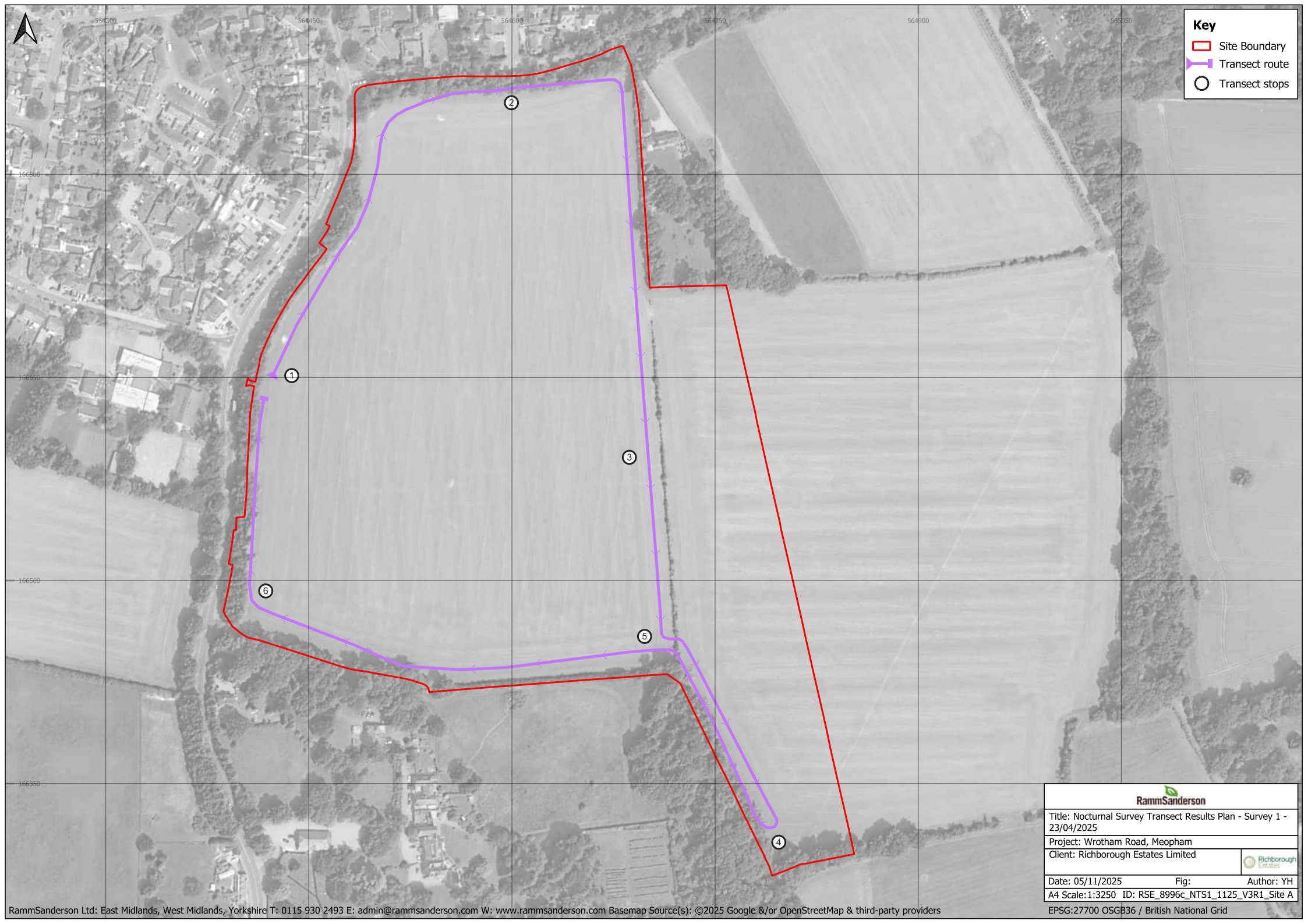

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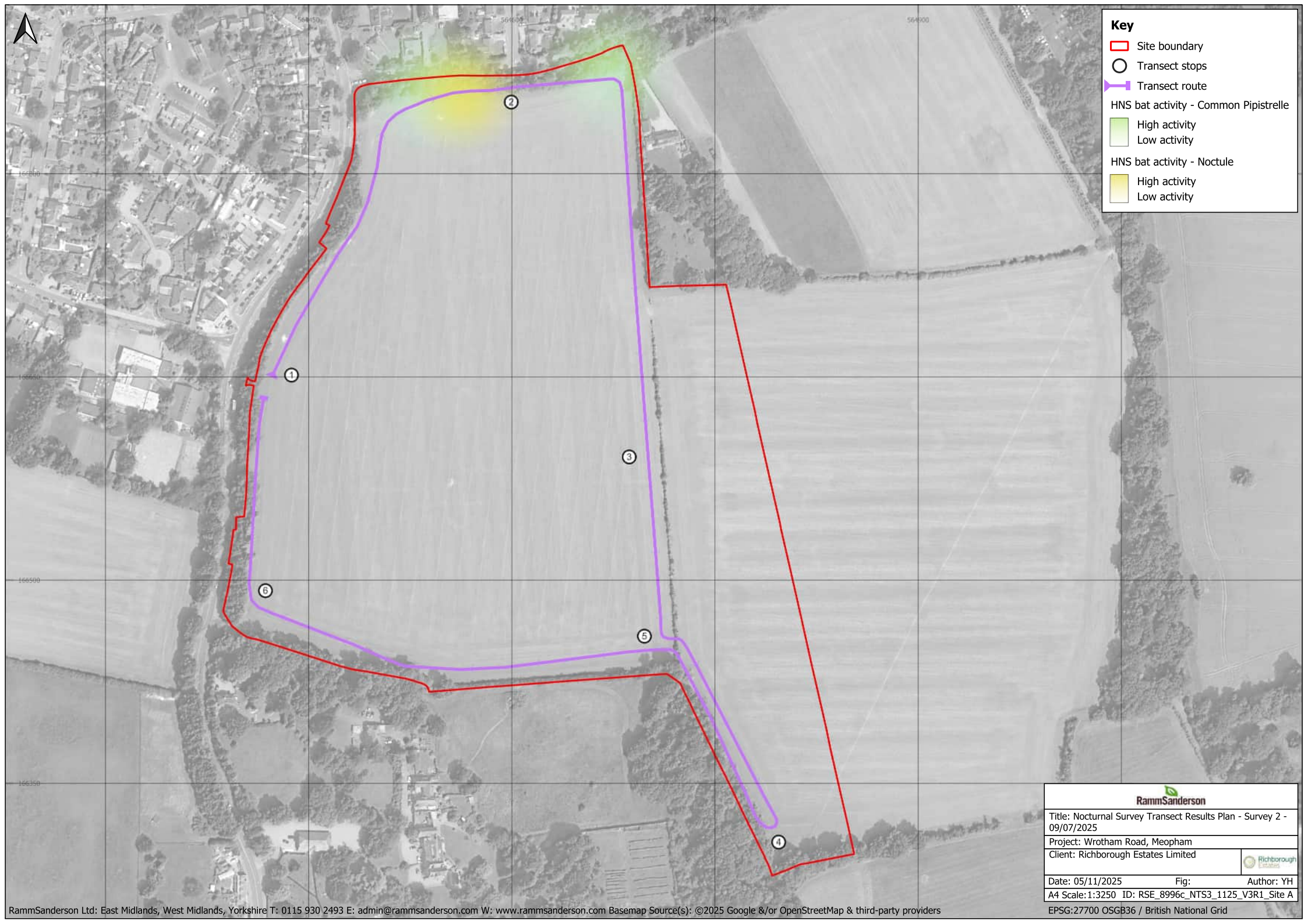
Title: Nocturnal Survey Transect Results Plan - Survey 1 - 23/04/2025

Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: YH

A4 Scale:1:3250 ID: RSE_8996c_NTS1_1125_V3R1_Site A



RammSanderson

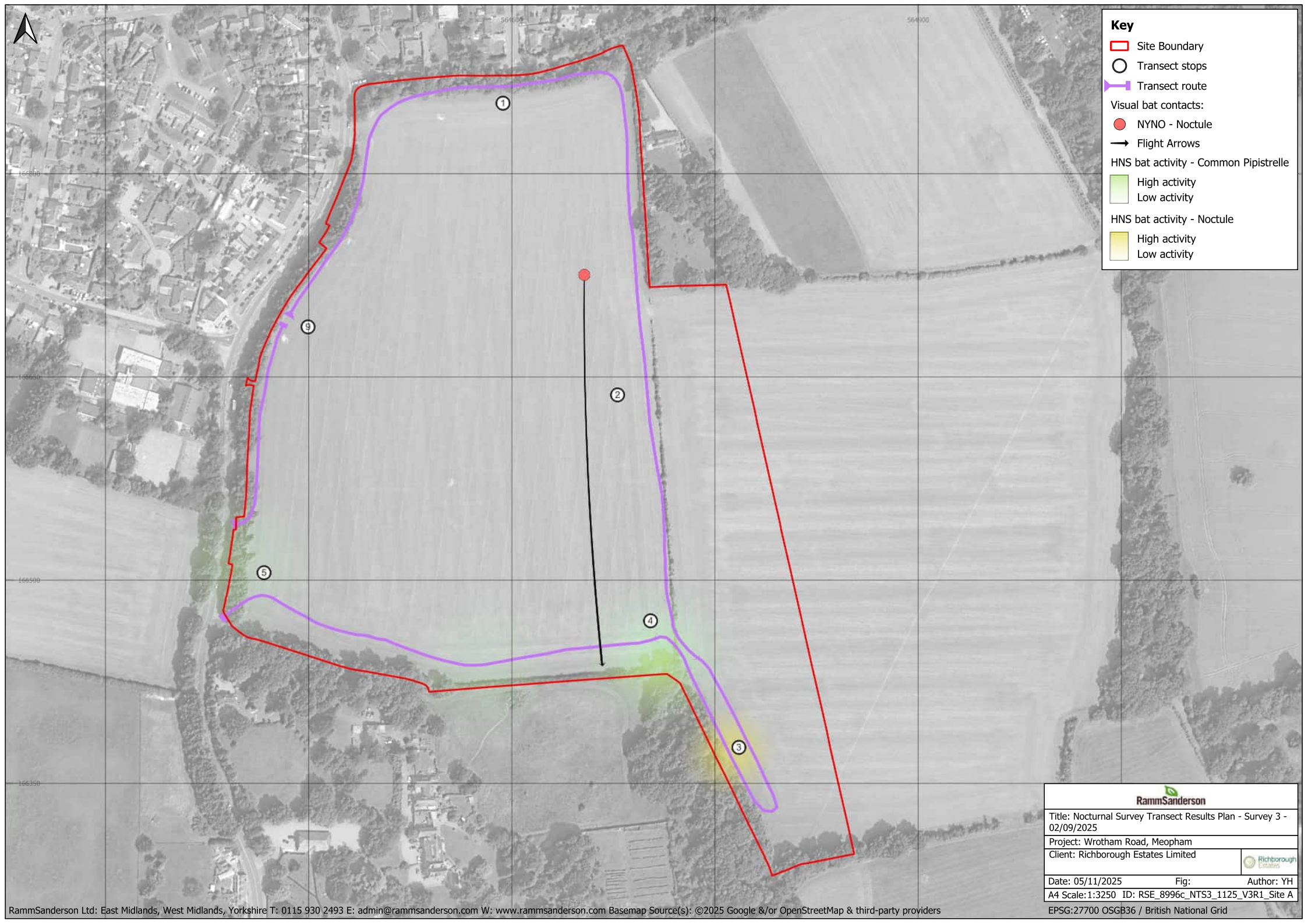
Title: Nocturnal Survey Transect Results Plan - Survey 2 - 09/07/2025

Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: YH

A4 Scale:1:3250 ID: RSE_8996c_NTS3_1125_V3R1_Site A


Key
Site Boundary
Transect stops
Transect route
Visual bat contacts:
NYNO - Noctule
Flight Arrows
HNS bat activity - Common Pipistrelle
High activity
Low activity
HNS bat activity - Noctule
High activity
Low activity
1
2
3
4
5
9
RammSanderson
Title: Nocturnal Survey Transect Results Plan - Survey 3 - 02/09/2025
Project: Wrotham Road, Meopham
Client: Richborough Estates Limited
Date: 05/11/2025
Fig:
Author: YH
A4 Scale:1:3250 ID: RSE_8996c_NTS3_1125_V3R1_Site A
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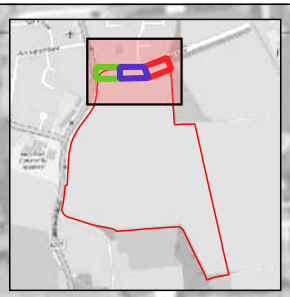
EPSG:27700 OSGB36 / British National Grid



C.Pip First seen in centre of screen, commuting along woodland feature and exits right of screen.

Bat passes throughout survey period along road and woodland. Unable to tell if emergences or re-entry occured due to poor video quality

BLE commuting from center of screen to right of the screen.

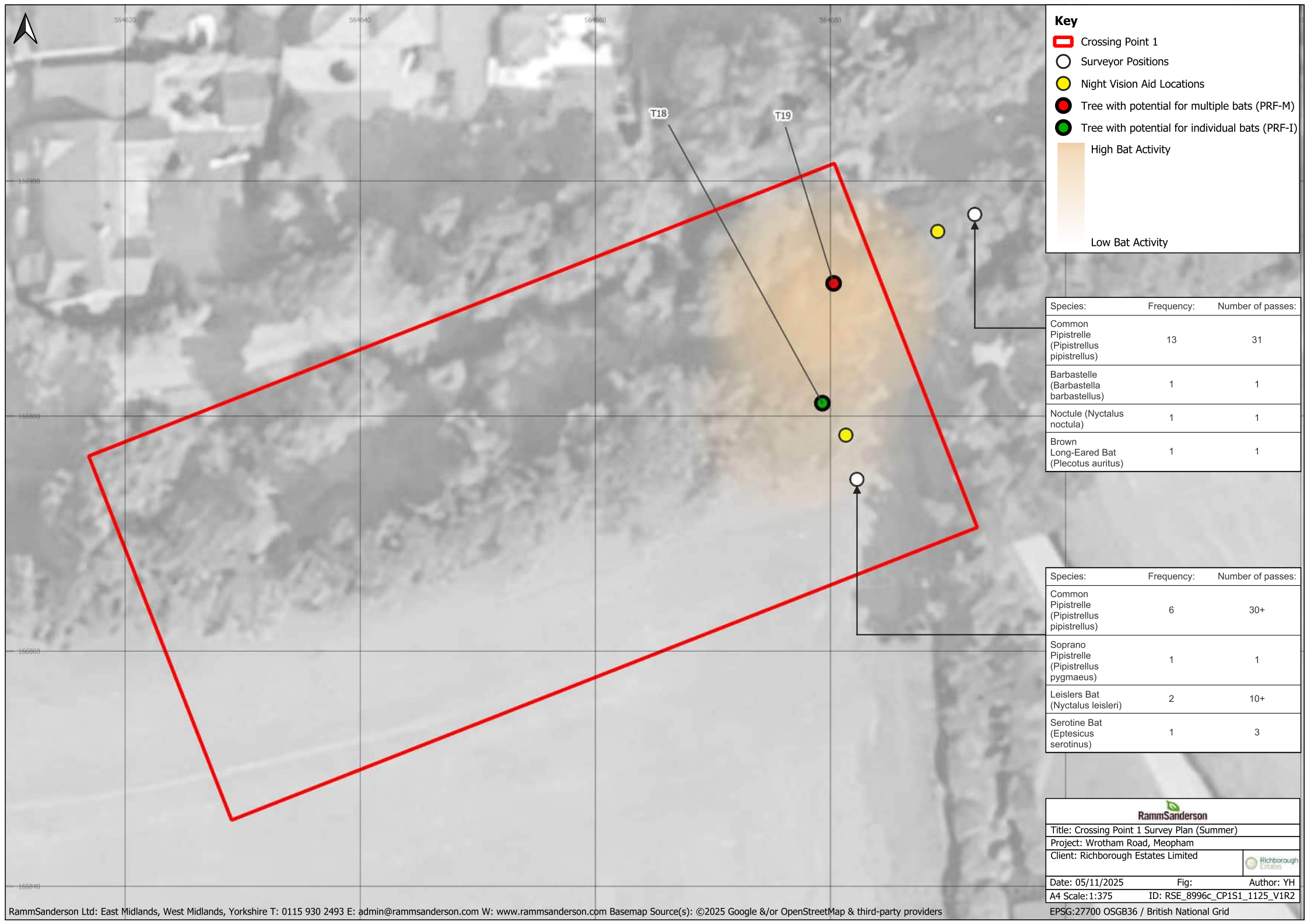
Key

- Crossing Point 1
- Crossing Point 2
- Crossing Point 3
- Surveyor Positions
- Night Vision Aid Locations
- Tree with potential for multiple bats (PRF-M)
- Tree with potential for individual bats (PRF-I)
- High Bat Activity
- Low Bat Activity

T6 T7 T8 T9 T10 T11 T12 T13 T14 T15 T16 T17 T18 T19

RammSanderson

Title: Crossing Point Survey Plan (Summer)	
Project: Wrotham Road, Meopham	
Client: Richborough Estates Limited	
Date: 05/11/2025	Fig: Author: YH
A4 Scale:1:800	ID: RSE_8996c_CPS1_1125_V1R2



Key

- Crossing Point 1
- Surveyor Positions
- Night Vision Aid Locations
- Tree with potential for multiple bats (PRF-M)
- Tree with potential for individual bats (PRF-I)
- High Bat Activity
- Low Bat Activity

Species:	Frequency:	Number of passes:
Common Pipistrelle (Pipistrellus pipistrellus)	13	31
Barbastelle (Barbastella barbastellus)	1	1
Noctule (Nyctalus noctula)	1	1
Brown Long-Eared Bat (Plecotus auritus)	1	1

Species:	Frequency:	Number of passes:
Common Pipistrelle (Pipistrellus pipistrellus)	6	30+
Soprano Pipistrelle (Pipistrellus pygmaeus)	1	1
Leislers Bat (Nyctalus leisleri)	2	10+
Serotine Bat (Eptesicus serotinus)	1	3

RammSanderson

Title: Crossing Point 1 Survey Plan (Summer)

Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: YH

A4 Scale:1:375 ID: RSE_8996c_CP1S1_1125_V1R2

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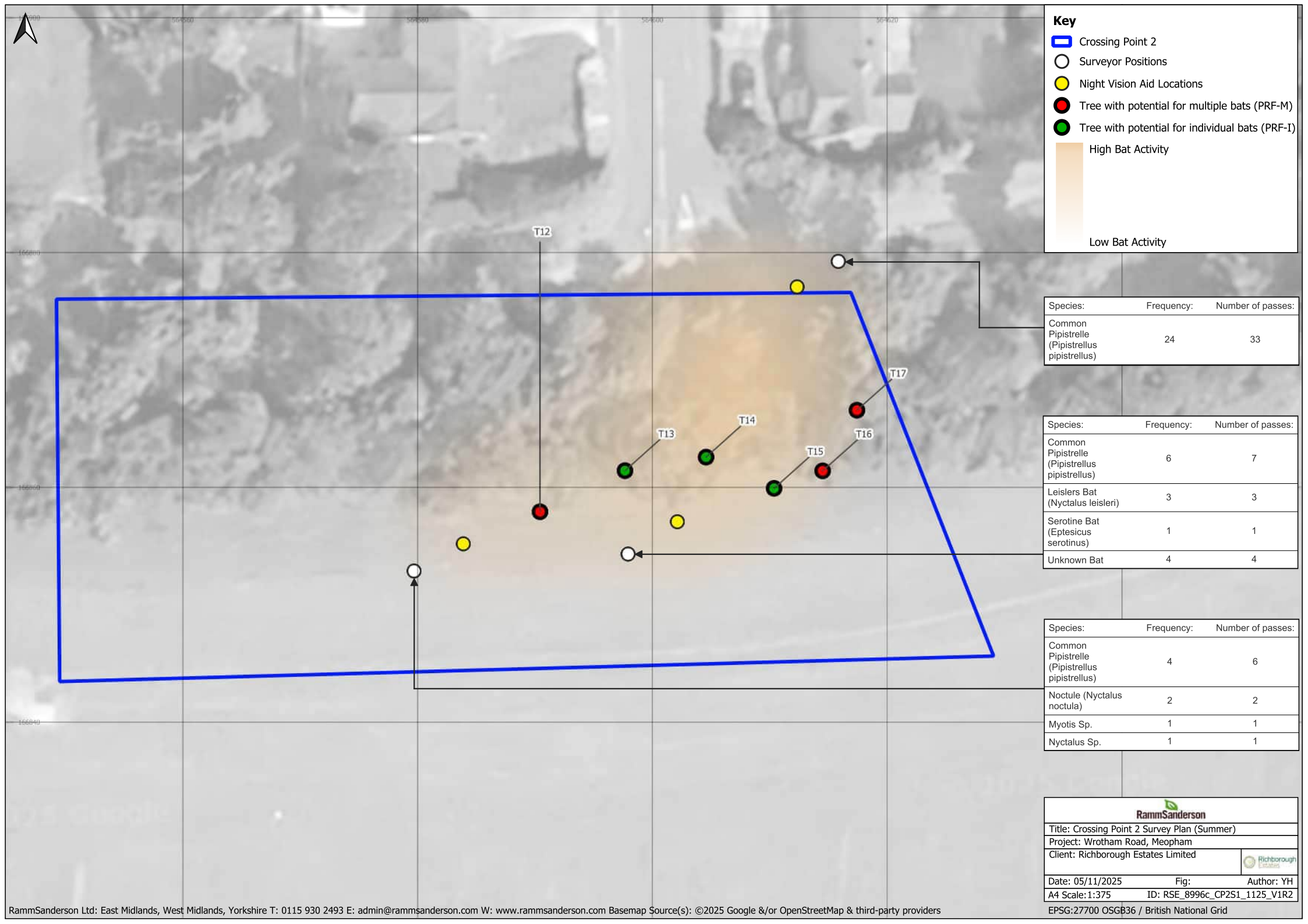
EPSG:27700 OSGB36 / British National Grid



Species:	Frequency:	Number of passes:
Common Pipistrelle (Pipistrellus pipistrellus)	24	33

Species:	Frequency:	Number of passes:
Common Pipistrelle (Pipistrellus pipistrellus)	6	7
Leislers Bat (Nyctalus leisleri)	3	3
Serotine Bat (Eptesicus serotinus)	1	1
Unknown Bat	4	4

Species:	Frequency:	Number of passes:
Common Pipistrelle (Pipistrellus pipistrellus)	4	6
Noctule (Nyctalus noctula)	2	2
Myotis Sp.	1	1
Nyctalus Sp.	1	1

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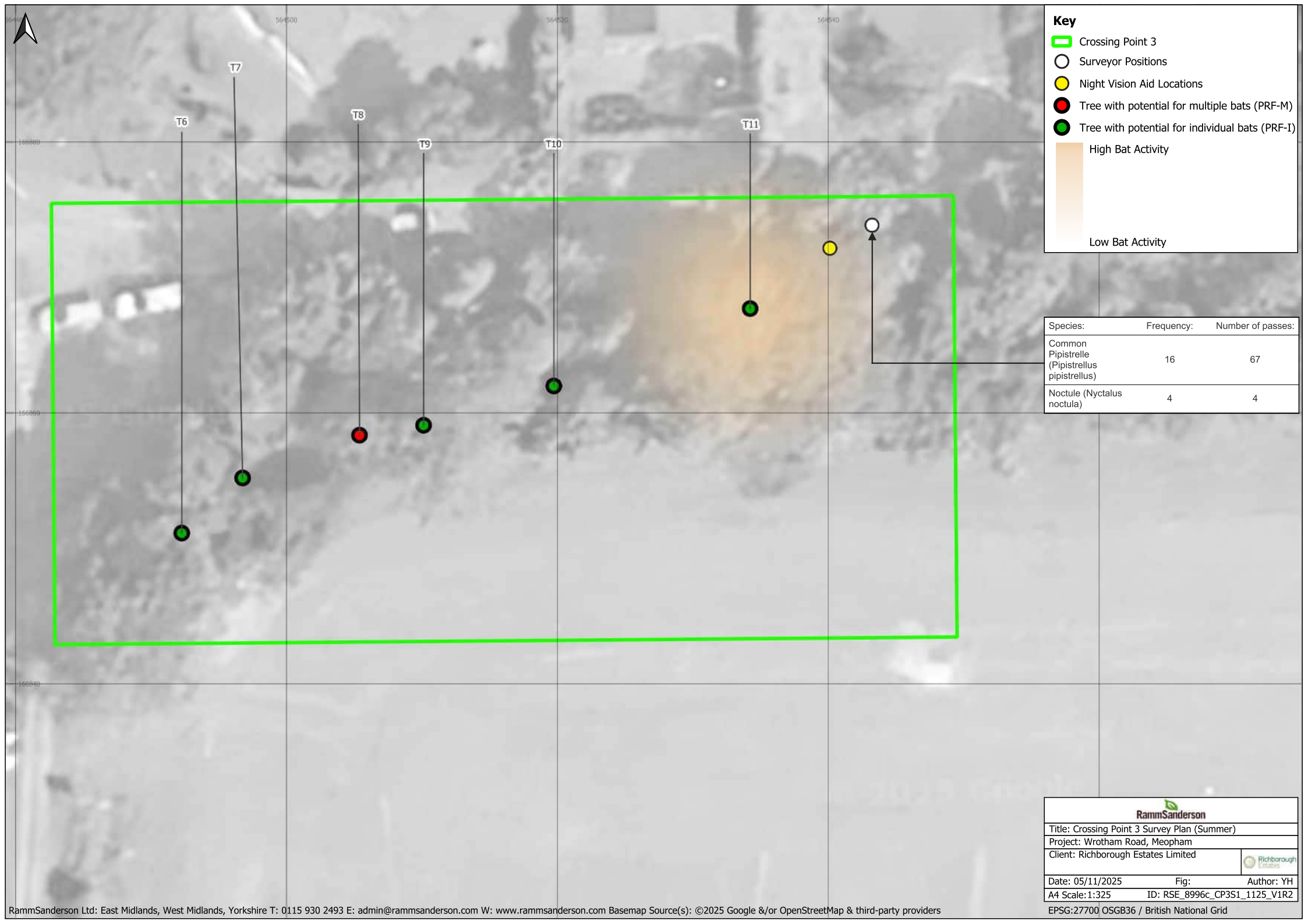
Title: Crossing Point 2 Survey Plan (Summer)

Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: YH

A4 Scale:1:375 ID: RSE_8996c_CP2S1_1125_V1R2



Key

- Crossing Point 3
- Surveyor Positions
- Night Vision Aid Locations
- Tree with potential for multiple bats (PRF-M)
- Tree with potential for individual bats (PRF-I)
- High Bat Activity
- Low Bat Activity

Species:	Frequency:	Number of passes:
Common Pipistrelle (Pipistrellus pipistrellus)	16	67
Noctule (Nyctalus noctula)	4	4

RammSanderson

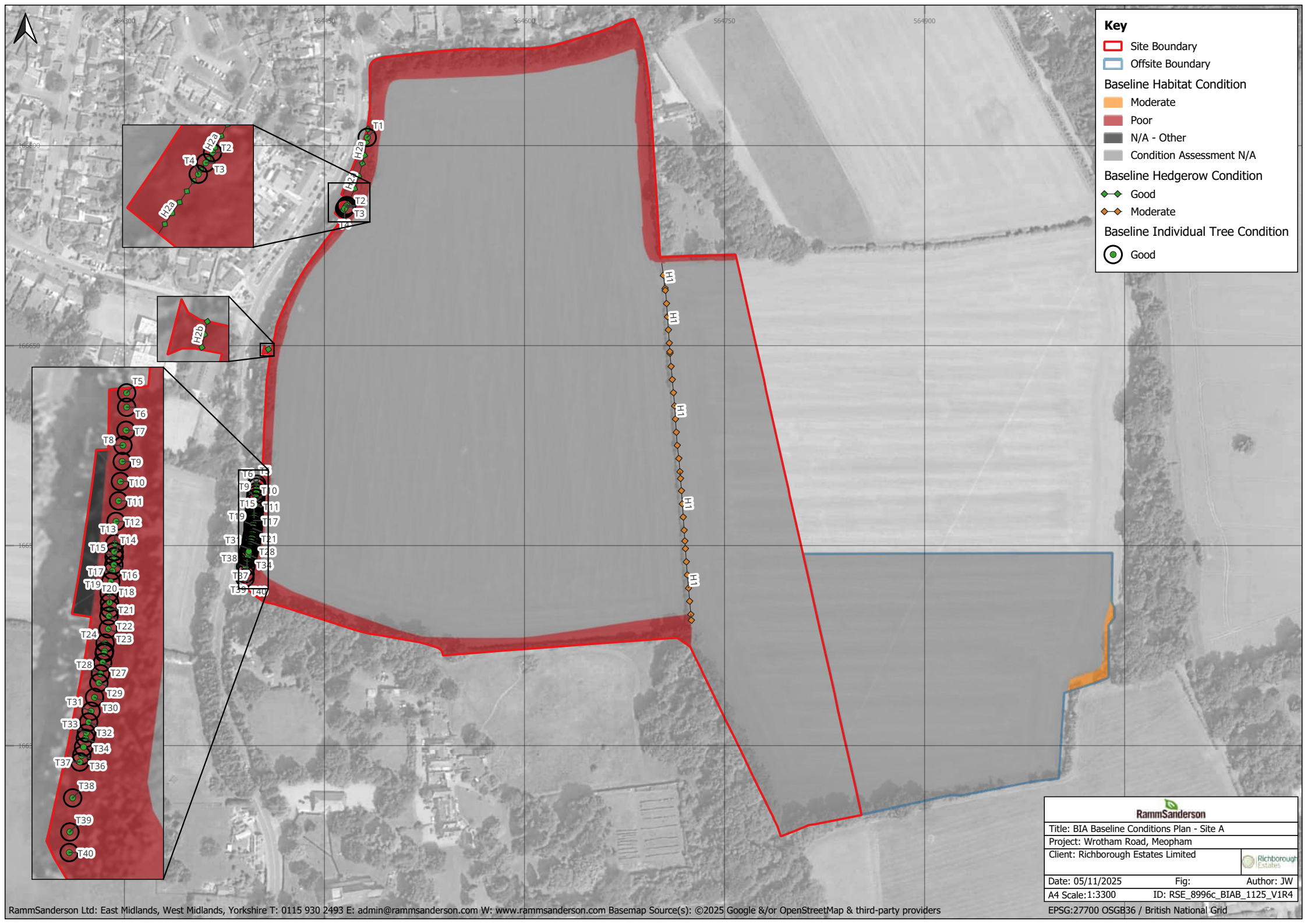
Title: Crossing Point 3 Survey Plan (Summer)

Project: Wrotham Road, Meopham

Client: Richborough Estates Limited

Date: 05/11/2025 Fig: Author: YH

A4 Scale:1:325 ID: RSE_8996c_CP3S1_1125_V1R2


Key
Site Boundary
Offsite Boundary
Baseline Habitat Condition
Moderate
Poor
N/A - Other
Condition Assessment N/A
Baseline Hedgerow Condition
Good
Moderate
Baseline Individual Tree Condition
Good
RammSanderson
Title: BIA Baseline Conditions Plan - Site A
Project: Wrotham Road, Meopham
Client: Richborough Estates Limited
Date: 05/11/2025
Fig:
Author: JW
A4 Scale:1:3300
ID: RSE_8996c_BIAB_1125_V1R4
EPSG:27700 OSGB36 / British National Grid
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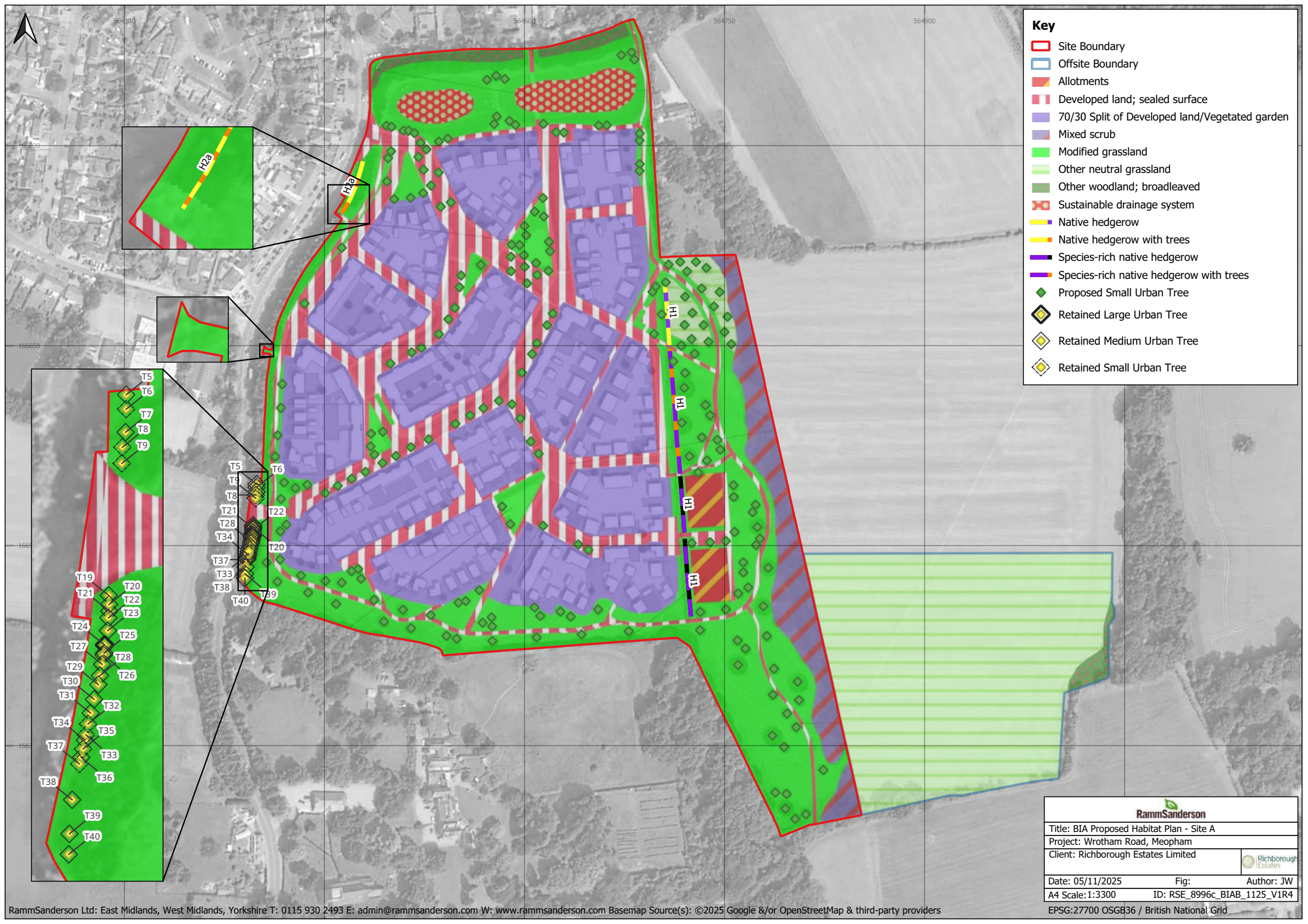
Key
Site Boundary
Offsite Boundary
Allotments
Developed land; sealed surface
70/30 Split of Developed land/Vegetated garden
Mixed scrub
Modified grassland
Other neutral grassland
Other woodland; broadleaved
Sustainable drainage system
Native hedgerow
Native hedgerow with trees
Species-rich native hedgerow
Species-rich native hedgerow with trees
Proposed Small Urban Tree
Retained Large Urban Tree
Retained Medium Urban Tree
Retained Small Urban Tree
H1
H2a
T5
T6
T7
T8
T9
T19
T20
T21
T22
T23
T24
T25
T26
T27
T28
T29
T30
T31
T32
T33
T34
T35
T36
T37
T38
T39
T40
RammSanderson
Title: BIA Proposed Habitat Plan - Site A
Project: Wrotham Road, Meopham
Client: Richborough Estates Limited
Date: 05/11/2025
Fig:
Author: JW
A4 Scale:1:3300
ID: RSE_8996c_BIAB_1125_V1R4
EPSG:27700 OSGB36 / British National Grid
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APPENDIX 1: RELEVANT LEGISLATION AND PLANNING POLICY

The UK is no longer a member of the European Union (EU). EU legislation as it applied to the UK on 31 December 2020 is now a part of UK domestic legislation. EU legislation which applied directly or indirectly to the UK before 11.00 p.m. on 31 December 2020 has been retained in UK law as a form of domestic legislation known as 'retained EU legislation'.

The Secretary of State for the Environment, Food and Rural Affairs and Welsh Ministers have made changes to parts of the Conservation of Habitats and Species Regulations 2017 (referred to as the 2017 Regulations) so that they operate effectively. Most of these changes involve transferring functions from the European Commission to the appropriate authorities in England. All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant and are now referred to as The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (the 2019 Regulations).

Designated Sites

Locally Designated Sites

Local Wildlife Sites are sites with 'substantive nature conservation value'. They are defined areas, identified and selected for their nature conservation value, based on important, distinctive and threatened habitats and species with a region.

They are usually selected by the relevant Wildlife Trust, along with representatives of the local authority and other local wildlife conservation groups.

The LWS selection panel, select all sites that meet the assigned criteria, unlike SSSIs, which for some habitats are a representative sample of sites that meet the national standard. Consequently, many sites of SSSI quality are not designated and instead are selected as LWSs. Consequently, LWSs can be amongst the best sites for biodiversity.

Protected Species

Bats /GCN/ Dormice

These species, known as European Protected Species, are protected under Regulation 43 of the 2017 Regulations as amended by the 2019 Regulations. This makes it an offence to deliberately capture, injure or kill an animal; deliberately disturb an animal; or damage or destroy a breeding site or resting place used by an animal.

Deliberate capture or killing is taken to include "accepting the possibility" of such capture or killing. Deliberate disturbance of animals includes in particular any disturbance which is likely a) to impair their ability (i) to survive, to breed or reproduce, or to rear or nurture their young, or (ii) in the case of animals of hibernating or migratory species, to hibernate or migrate; or b) to affect significantly the local distribution or abundance of the species to which they belong.

Where development works are at risk of causing one or more of the offences listed above, a mitigation licence from Natural England can be obtained to facilitate the works that would otherwise be illegal.

These species are also protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). This makes it an offence to intentionally or recklessly obstruct access to any structure or place used for shelter or protection or disturb an animal in such a place.

Lower levels of disturbance not covered by the Conservation of Habitats and Species Regulations 2017 remain an offence under the Wildlife and Countryside Act 1981 although a defence is available where such actions are the incidental result of a lawful activity that could not reasonably be avoided.

Nesting Birds

All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended), with some species afforded greater protection under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). In addition to the protection from killing or taking that all birds receive, Schedule 1 birds and their young must not be disturbed at the nest.

There are no licensing purposes that explicitly cover development activities affecting wild birds.

Badgers

Badgers and their setts are protected under the Protection of Badgers Act 1992 (as amended). This makes it an offence to wilfully kill, injure or take a badger; or intentionally or recklessly damage, destroy or obstruct access to a badger sett or disturb a badger in its sett.

It is not illegal to carry out disturbance activities near setts that are not occupied, i.e. those that do not show signs of current use.

Where required, licences for development activities involving disturbance or sett interference or closure are issued by Natural England. Licences for activities involving watercourse maintenance, drainage works or flood defences are issued under a separate process.

When assessing the requirement for a licence in respect of development, Natural England (Natural England, 2009) state that badgers are relatively tolerant of moderate levels of noise and activity around their setts, and that a low or moderate level of apparent disturbing activity at or near to badger setts does not necessarily disturb the badgers occupying those setts.

Licences are normally not granted from December to June inclusive (the badger breeding season) because dependent cubs may be present within setts.

Species and Habitats of Principal Importance for the Conservation of Biodiversity

Section 40 of the Natural Environment & Rural Communities Act (NERC) 2006 sets out the duty for public authorities to conserve biodiversity in England.

Habitats and species of principal importance for the conservation of biodiversity are identified by the Secretary of State for England, in consultation with Natural England, are referred to in Section 41 of the NERC Act for England. The list, known as the 'England Biodiversity List', of habitats and species can be found on the Natural England web site.

The 'England Biodiversity List' is used as a guide for decision makers such as public bodies, including local and regional authorities, in implementing their duty under Section 40 of the NERC Act 2006 to have regard to the conservation of biodiversity in England when carrying out their normal functions. The habitats and species on the List, are material considerations of planning, where present on an application site.

Planning Policy

National Planning Policy Framework, 2025

The National Planning Policy Framework (NPPF) (Department of Communities & Local Goverment, 2025) sets out the Governments planning policies for England and how these are expected to be applied by Local Authorities within their Local Development Frameworks (LDF).

Regarding the NPPF, the most pertinent paragraphs are:

> *8.c) "to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy"*

174.d) "minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"

179.b) "promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

180.a) "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."

180.c) "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 reasons63 and a suitable compensation strategy exists."

BNG Policy

The National Planning Policy Framework states that "planning decisions should minimise impacts on and provide net gain for biodiversity". Furthermore, from February 2024, 10% BNG became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This means all relevant developments must achieve at least 10% BNG relative to the baseline biodiversity value of all land within the planning application boundary.

Local Planning Policy

The Gravesham Local Plan Core Strategy adopted in September 2014 sets out the following relevant polices:

Policy CS12: Green Infrastructure – Section 5.7.24 states "There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought" Section 5.7.25 states "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."

Policy CS19: Development and Design Principles – Section 5.15.14 states "New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network.

Local Biodiversity Action Plans

The Kent Biodiversity Strategy aims to deliver, over a 25- year period, the maintenance, restoration and creation of habitats that are thriving with wildlife and plants and ensure that the county's terrestrial, freshwater, intertidal and marine environments regain and retain good health (KCC, 2020). The Strategy has identified 17 priority habitats and 13 priority species that Kent can play a significant part in the restoration of. It has also identified a handful of species that can act as indicators of the health of our ecosystems.

APPENDIX 2: METHODOLOGY

Desk Study

Background Records Search

i The preliminary ecological assessment includes a desk study to obtain background records relevant to a Site and the Scheme. The data obtained provides contextual information for the scope of field surveys, to aid the evaluation of field survey results, and to provide supplementary information where complete field survey coverage is not possible.

ii The Study Area is dependent upon the nature, timing and scale of the Scheme, as well as the location of the Site and the surrounding landscape. These variables all contribute to what is referred to as the Zone of Influence (ZoI) of the Scheme, which is the area over which ecological features may be affected by biophysical changes because of the works and associated activities.

iii In 2025 the Kent and Medway Biological records Centre was contacted to obtain the following ecological data:

- Records of non-statutory designated sites within 1 km of the Site boundary.
- Records of legally protected and notable species (fauna and flora) within 1 km of the Site boundary, including Species of Principal Importance for the Conservation of Biodiversity listed under Section 41 of the Natural Environment & Rural Communities Act 2006 in the England Biodiversity List[21].

iv The Multi-Agency Geographic Information for the Countryside (MAGIC) (www.magic.gov.uk) website was reviewed for the following information:

- Designated sites of nature conservation importance (statutory sites only) within 1 km of the Site; and,
- Notable habitats within 1 km of the Site, these being areas of ancient woodland and 'Habitats of Principal Importance for the Conservation of Biodiversity' included in the England Biodiversity List.

Great Crested Newt Pond Search

v Ordnance Survey maps and the Where's the Path website (https://wtp2.appspot.com/wheresthepath.htm) have been used to identify the presence of water bodies within 500 m of the Site boundary, in order to help establish if the land within and immediately surrounding the Site could be used by great crested newts. This species can use suitable terrestrial habitat up to 500 m from a breeding pond (English Nature, 2001), though there is a notable decrease in great crested newt abundance beyond 250 m from a breeding pond (Natural England, 2004).

Field Survey

vi The preliminary ecological assessment includes a walkover survey of the Survey Area (all land within the Site and adjacent to), broadly following the Phase 1 habitat survey methodology as set out in Joint Nature Conservation Committee guidance (Joint Nature Conservation Committee, 2010). This survey method records

[21] Section 40 of the Natural Environment & Rural Communities Act 2006 requires that very public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. The Secretary of State has drawn up, in accordance with Section 41 of the Act and in consultation with Natural England, a list of habitats and species of principal importance for the conservation of biodiversity in England that is known as the England Biodiversity List

information on habitat types and is 'extended' to record any evidence of and potential for protected or notable species to be present. Plant names recorded during the survey follow (Stace, 2019).

vii During the walkover survey, the following protected or notable species are considered:

- **Badger**: the survey involves searching for signs of badger activity including setts, tracks, snuffle holes and latrines, following the methodology detailed in (Scottish Natural Heritage, 2018) and (Harris, 1989).
- **Bats**: the survey involves searching for potential roosting sites for bats within trees and structures (such as buildings, bridges or underground features such as mines) and categorising the potential of those trees or structures to support roosting bats (negligible to high, or confirmed roost), in accordance with Bat Conservation Trust (BCT) (Collins, J. (Eds.), 2016) guidance.
- **Birds**: the survey involves assessing the potential of habitats within the Survey Area to support breeding, wintering or migrating birds, either individually notable species or assemblages of both common and rarer species;
- **Great crested newt**: the survey involves assessing the potential of habitats within the Survey Area to support great crested newt, following English Nature (English Nature, 2001) and Froglife (Froglife, 2001) guidance;
- **Reptiles**: the survey involves assessing the potential of habitats within the Survey Area to support reptiles (typically adder, grass snake, common lizard and slow worm only, though in some locations and habitat types (most notably heathland) may also include smooth snake and sand lizard), following Froglife (Froglife, 1999) and JNCC ((Joint Nature Conservation Committee, 2003) guidance;
- **Notable species of invertebrate**: the survey involves assessing the potential of habitats within the Survey Area to support notable species of invertebrates, both terrestrial and aquatic (including white-clawed crayfish);
- **Protected or Notable species of plants**: the survey involves recording protected or notable plant species;
- **Other notable species**: the survey involves assessing the potential of habitat within the Survey Area to support other Notable Species, such as hedgehog, brown hare, polecat or common toad;
- **Non-native invasive plant species**: the survey involves recording evidence of the presence of invasive plants listed on (Wildlife and Countryside Act , 1981 (as amended)) and subject to strict legal control.

Tree and Building Bat Roost Suitability Assessment

viii Buildings, trees and other structures were graded as to their suitability for supporting roosting bats using (Collins, J. (Eds.), 2023), an extract of which is provided interpreted in the table below.

Table 8: Criteria for bat roost potential assessment of trees

Roost Potential	Description	Surveys Required (Trees)
Confirmed roost	Evidence of roosting bats found during initial daytime inspection or known bat roost present.	3 – including 1 dawn as a minimum or all dusk surveys supplemented by night vision aids (May to September).
PRF-M	PRF is suitable for multiple bats and therefore may be used by a maternity colony.	Or: conduct Advanced Licence Bat Survey Techniques (ALBST) for larger schemes and / large numbers of trees and PRF-Ms. Winter: 2 surveys / Assume presence and mitigate – December to February.
PRF-I	PRF is only suitable for individual bats or very small numbers of bats due to either size or lack of suitable surrounding habitat.	Compensate for all PRF-Is prior to impacts. Precautionary Mitigation of Works for works. In some instances, may require further survey depending on context.

Roost Potential	Description	Surveys Required (Trees)	
Negligible	No obvious features likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion. Risk considered insignificant.	None	1 Survey - all surveyors using Night Vision Aids (NVAs)

Hazel Dormouse Presence / Likely Absence Survey

ix A habitat quality assessment for dormice has been undertaken in line with Wells, D., Chanin, P. & Gubert, L. (2025) Hazel Dormouse Mitigation Handbook. This assessment takes into consideration the species diversity and suitability for dormice, structural complexity of habitat, abundance and distribution of bramble, habitat management regimes, habitat fragmentation, habitat connectivity and dispersal barriers. The habitat assessment results in poor/fair habitat quality or good/excellent habitat quality. For certain survey methodologies the result of the habitat assessment will impact the survey effort required. There are three methodologies which can be used to prove absence.

Nest Tubes

x As per the recommended protocol for sites where habitat quality is poor/fair for dormice, a minimum of 100 tubes have been deployed for a full season (from April/May until November) and have been checked monthly.

xi As per the recommended protocol for sites where habitat quality is good/excellent for dormice, a minimum of 50 tubes have been deployed based on the required minimum survey effort depending on the month the tubes were deployed as stated in the table below:

Table 9: Hazel Dormouse Nest Tubes Survey Effort

Tubes installed	Number of checks at monthly intervals	End date
April	6	September
May	5	
June	4	
July	3	
August	3	October
September	3	November
October	9	September following year (restarted in the April)

Biodiversity Accounting

xii The biodiversity net gains assessment involves making a comparison between the biodiversity value of habitats present within the Site prior to a development (i.e. the 'baseline') and the predicted biodiversity value of habitats following the completion of the Scheme (i.e. 'post development'). The comparison is undertaken in terms of 'biodiversity units', with a 'biodiversity metric' providing the mechanism to allow biodiversity values to be calculated and compared.

xiii The metric assesses and generates separate outputs for area-based habitats and linear based habitats (with rivers reported separately to other habitats like hedgerows). A development cannot claim to achieve net gain until biodiversity net gains are predicted across all area-based, linear based and river based habitats.

xiv The calculation for area-based and linear (non-river) habitats calculates biodiversity units as follows:

- Before Works = Distinctiveness Score x Condition Assessment x Area/Length x connectivity x strategic significance
- After Works = ((Distinctiveness Score x Condition Score x Area/ Length x connectivity x strategic significance) / Time to Target Condition) / Difficulty of Creation/Restoration

xv The five factors are determined as set out below:

- Distinctiveness Score – High, Medium or Low, based on UK habitat classifications.
- Condition Score – Good, Fairly good, Moderate, Fairly poor or Poor, based on habitat condition assessment.
- Area/Length – hectares (ha)/ length (km) of habitat type.
- Connectivity – High, Medium and Low.
- Strategic significance – High (Within area formally identified in local strategy), Medium (Location ecologically desirable but not in local strategy) and Low (Area/compensation not in local strategy/ no local strategy).
- Time until target condition – time period (in years) until the target condition will be achieved.
- Difficulty of creation/restoration – a score applied to account for risk associated with creating/restoring different types of habitat.

Limitations

xvi The aim of a desk study is to help characterise the baseline context of a proposed development and provide valuable background information that would not be captured by a single site survey alone. Information obtained during the course of a desk study is dependent upon people and organisations having made and submitted records for the area of interest. As such, a lack of records for a particular habitats or species does not necessarily mean that the habitats or species do not occur in the study area. Likewise, the presence of records for particular habitats and species does not automatically mean that these still occur within the area of interest or are relevant in the context of the proposed development.

xvii An ecological survey represents a 'snapshot' in time of the ecological condition of a Site. The ecological character of a Site can change substantially throughout both the course of a year, and from year to year impacting on the extent and quality of habitats potential to support protected species.

xviii Deployed bat static detectors failed to record all of the required data. Static 1 failed to record any data during September and failed to record the full five nights data within July, recording only four nights. Static 2 failed to record any data during April and although it recorded five nights of data during September these nights were not consecutive, recording 2nd, 3rd, 4th, 5th, 7th and 8th September. Due to these technical issues, the amount of survey data is not as complete as would be the ideal. Nevertheless, as monitoring was performed for an extended period of time (April to September inclusive), in addition to the activity transects, and crossing point surveys, it was considered that the amount of bat survey data obtained across the monitoring period was sufficient to draw adequate conclusions on the species and general levels of bat activity within the Application Site.

Table 10: Survey Dates

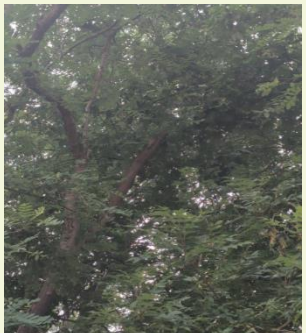
Survey Type	Dates[22]
Badger	24/04/2025
Ukhabs/conditions assessment	26/02/2025, 03/07/2025, 04/07/2025
Winter bird surveys	21/01/2025, 26/02/2025
Ground level tree assessments	03/07/2025, 04/07/2025
Hazel dormouse presence/absence	24/04/2025, 29/05/2025, 26/06/2025, 17/07/2025, 29/08/2025, 17/09/2025
Breeding bird surveys	30/04/2025, 15/05/2025, 29/05/2025, 12/06/2025
Bat activity transects	23/04/2025, 09/07/2025, 02/09/2025
Bat crossing point surveys	14/08/2025, 18/09/2025

[22] (undertaken in suitable conditions unless stated in limitations section)

APPENDIX 3: Survey Results

Bat Ground Level Tree Assessment

Table 11: Summary of Ground Level Tree Assessment Results

Feature	Species	Description	Grading	Photographs
T3	Unknown	Dead tree providing features within main trunk	PRF-I	
T4	Ash	Single broken limb	PRF-I	

Feature	Species	Description	Grading	Photographs
T5	Wild Cherry	Split in limb of tree	PRF-I	
T6	Horse Chestnut	Tree is covered in ivy. Directly behind power lines	PRF-I	

Feature	Species	Description	Grading	Photographs
T7	Ash	Dense Ivy Stems	PRF-I	
T8	Ash	Large trunk cavity on west	PRF-M	

Feature	Species	Description	Grading	Photographs
T9	Sweet Chestnut	Dense Ivy Coverage	PRF-I	
T10	Unknown	Dead Tree	PRF-I	

Feature	Species	Description	Grading	Photographs
T11	Sweet Chestnut	Dead Tree	PRF-I	
T12	Sweet Chestnut	Dead Tree	PRF-M	No Photo
T13	Sweet Chestnut	Knot holes present	PRF-I	

Feature	Species	Description	Grading	Photographs
T14	Sweet Chestnut	Limb Split	PRF-I	
T15	Sweet Chestnut	Limb split	PRF-I	
T16	Sweet Chestnut	Dead tree	PRF-M	

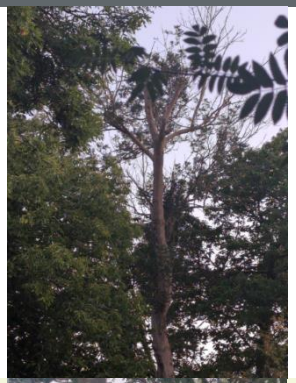
Feature	Species	Description	Grading	Photographs
T17	Ash	Dead tree, multiple woodpecker holes	PRF-M	
T18	Ash	Trunk cavity but downward facing so open to elements Ivy cover	PRF-I	
T19	Ash	Large trunk split	PRF-M	

Table 12: Static Monitoring Results Static 1

Static dates	Common Pipistrelle	Soprano Pipistrelle	Nathusius' Pipistrelle	Noctule	Leisler's	Myotis Sp.	Serotine	Brown long-eared	Total No. of passes	Total no. of nights	Average passes per night (all species)
23/04/2025 - 27/04/2025	166	2		10	57	18		6	259	5	51.8
17/07/2025 - 22/07/2025	4,994	325	1		12	8	54	24	5418	4	1354.5
02/09/2025- 09/09/2025					No Data					0	
Total passes / species	5160	327	1	10	69	26	54	30	5418	9	602
Average passes/ species	573.33	36.33	0.11	1.11	7.67	2.89	6.00	3.33			
% of bat passes / species	95.24	6.04	0.02	0.18	1.27	0.48	1.00	0.55			

Table 13: Static Monitoring Results Static 2

Static dates	Common Pipistrelle	Soprano Pipistrelle	Nathusius' Pipistrelle	Noctule	Leisler's	Myotis Sp.	Serotine	Brown long-eared	Total No. of passes	Total no. of nights	Average passes per night (all species)
23/04/2025 - 27/04/2025	No Data								0	0	0
17/07/2025 - 22/07/2025	894		1	33	294	14	54		1290	5	258
02/09/2025- 09/09/2025	3332	39		2	19	70	13	3	3478	5	695.6
Total passes / species	4226	39	1	35	313	84	67	3	4768	10	476.8
Average passes/ species	422.60	3.90	0.10	3.50	31.30	8.40	6.70	0.30			
% of bat passes / species	88.63	0.82	0.02	0.73	6.56	1.76	1.41	0.06			

BIODIVERSITY IMPACT ASSESSMENT

Table 14: Habitat Descriptions

UK Hab Description	Area (hectares) / Baseline Biodiversity Units	Condition Assessment	Habitat Condition Comments
Non-Cereal Crops	14.349ha / 28.7 units	No Condition Assessment Applicable	The arable field covering the majority of the site is planted with non-cereal crops. Possible brassica spp. The condition of the habitat defaults to condition assessment N/A. The habitat is not strategically significant.
Modified Grassland	1.1926ha / 2.39 units	Poor	Modified grassland present along the north, west, south and the northern part of the eastern boundary of the site. All comprising perennial rye grass, cocksfoot, creeping buttercup and a range of other species typical of the habitat type. The habitat has been condition assessed as poor as it fails to achieve the first criteria in the condition assessment which is essential for achieving moderate condition. The habitat does achieve the following criteria: C. Some scattered scrub (including bramble Rubus fruticosus agg.) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type. F. Cover of bracken Pteridium aquilinum is less than 20%. G. There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA). In the absence of a Local Nature Recovery Strategy for Kent and Medway, the local plans and policies for Gravesham Borough Council have been reviewed and the habitat isn't within a strategic site, hence strategic significance.
Developed Land, Sealed Surface	0.0208ha / 0.00 units	No Condition Assessment Applicable	Developed land; sealed surface present in the southeast and northeast of the site comprising roads and footpaths. The condition of the habitat defaults to N/A - Other. The habitat is not strategically significant.

UK Hab Description	Area (hectares) / Baseline Biodiversity Units	Condition Assessment	Habitat Condition Comments
Other Broadleaved Woodland	0.1869ha / 0.76 units	Poor	Approximately 5m wide woodland strip along the northern boundary of the eastern field, between the field and road. Comprising ash, horse chestnut and sycamore trees with an understory comprising snowdrops, cleavers, ivy, lords and ladies, daffodils, holly and rose. The habitat has been condition assessed as poor by achieving a score of 23 in the condition assessment with the following criteria: Two age-classes present. No significant browsing damage evident in woodland. Rhododendron or cherry laurel present, or other invasive species >10% cover. Three to four native tree or shrub species found across woodland parcel. >80% of canopy trees and >80% of understory shrubs are native. <10% or >40% of woodland has areas of temporary open space. But if woodland <10ha has <10% temporary open space. No classes or coppice regrowth present in woodland. Tree mortality less than 10%, no pests or diseases and no crown dieback. No recognisable woodland NVC plant community at ground layer present. One or less storey across all survey plots. No veteran trees. Between 25% and 50% of all survey plots within the woodland parcel have deadwood, such as standing deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities. More than 1 hectare of nutrient enrichment and or more than 20% of woodland area has damaged ground. In the absence of a Local Nature Recovery Strategy for Kent and Medway, the local plans and policies for Gravesham Borough Council have been reviewed and the habitat isn't within a strategic site, hence strategic significance.
Urban Tree	0.0733ha / 0.88 units	Good	2 large individual urban native trees located in the southwest of the site (part of an urban line of trees). The trees have been condition assessed separately as good as they both achieve the following criteria in the condition assessment: A. The tree is a native species (or at least 70% within the block are native species). B. The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion). C. The tree is mature (or more than 50% within the block are mature). D. There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.

UK Hab Description	Area (hectares) / Baseline Biodiversity Units	Condition Assessment	Habitat Condition Comments
			E. Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark. F. More than 20% of the tree canopy area is oversailing vegetation beneath. T10 and T24 to be retained in line with proposals. In the absence of a Local Nature Recovery Strategy for Kent and Medway, the local plans and policies for Gravesham Borough Council have been reviewed and the habitat isn't within a strategic site, hence strategic significance.
Urban Tree	0.4723ha / 5.67 units	Moderate	29 medium individual urban native trees located on site. T1-T4 located in the northeast of the site as part of a native hedgerow with trees. T1-T4 to be lost in line with proposals. T5, T7, T11-T14, T16, T18-T23, T25-T31, T34, T36, T38-T40 located in the southwest of the site (part of an urban line of trees). T12-T14 to be lost in line with proposals. The trees have been condition assessed separately as good as they all achieve the five or six criteria in the condition assessment: Either A,B,C,D, E,F or B,C,D,E,F or A,B,C,D,F In the absence of a Local Nature Recovery Strategy for Kent and Medway, the local plans and policies for Gravesham Borough Council have been reviewed and the habitat isn't within a strategic site, hence strategic significance.
Urban Tree	0.0366ha / 0.44 units	Poor	9 small individual urban native trees located in the southwest of the site (part of an urban line of trees). The trees have been condition assessed separately as good as they all achieve the five criteria in the condition assessment: Either A,B,C,D,F or A,B,C,E,F. T15 to be lost in line with proposals. T6, T8, T9, T17, T32, T33, T35 and T37 to be retained in line with proposals. In the absence of a Local Nature Recovery Strategy for Kent and Medway, the local plans and policies for Gravesham Borough Council have been reviewed and the habitat isn't within a strategic site, hence strategic significance.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Area habitat units*	5.85
	Hedgerow units	0.24
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Area habitat units*	15.08%
	Hedgerow units	12.49%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	