Project: 25_PEA_BNG_09_47
Site: 70 Lower Vicarage Rd, Kennington, Ashford TN24 9AS
Client: Daniel McCarthy

Supplementary Document - Preliminary Bat Roost Assessment. (SP-1)

Supplementary Document - Potential Roosting Features. (SP-2)

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Project Number:	25_PEA_BNG_09_47
Report Type:	Preliminary Ecological Appraisal Report (PEAR)
Site Address:	70 Lower Vicarage Rd, Kennington, Ashford TN24 9AS

Role:	Name:	Position:	Date:
Consultant	Rodrigo Iniesta	Environmental Science	21/10/25
Surveyor	Antony Aslam	Ecologist	06/10/25

Revision History		
Date:	Version number:	Summary of changes:
21/10/25	1.0	First Draft
27/10/25	1.0	First Issue
31/10/25	2.0	Update

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Summary:	
Site Surveyed	Land at 70 Lower Vicarage Rd, Kennington, Ashford TN24 9AS National Grid Reference: NGR TR 0145 6609
Purpose & Brief	Preliminary ecological appraisal commissioned by Daniel McCarthy
Development Proposals	The proposed development is erection of two single-storey bungalows with associated access, parking and landscaping
Methods	Desk Study UK Habitat Classification (UKHab) survey of the site. Assessment of likely significant effects as far as can be reasonably and proportionally known
Confirmed Ecological Constraints	None
Potential Ecological Constraints	Nesting birds in bramble in boundary vegetation. Reptiles (slow worm or common lizard) associated with TN1 (rubble) an bramble edges. Hedgehog using TN1 or garden edges. Common amphibians occasionally within rubble or grass. Lighting: potential effects on foraging bats if poorly designed.
Recommendations For Further Survey Works	Reptiles: No dedicated surveys are considered proportionate. Works will proceed under a Precautionary Method of Working (PMW) for reptiles given the small, isolated extent of low-quality habitat (bramble edges and a small rubble pile) Birds: pre-works nesting bird check if vegetation is removed Mar–Aug (inclusive). No surveys required for roosting bats, GCN, badger, dormouse, otter, water vole (according to current baseline).
Opportunities For Ecological Enhancements	Native species planting

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With the assumption that the existing conditions on-site remain unchanged. The results of this report are likely to remain valid for 12-months inline with the guidance published by CIEEM and the Bat Conservation Trust.

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Acknowledgements:

Data referred to within this report was sourced from Natural England Department for Environment, Food and Rural Affairs Multi-Agency Geographic Information for the Countryside (DEFRA MAGIC) database and through direct consultation with Kent & Medway Biological Records Centre (KMBRC).

Client Documents:

This report has been completed on the assumption that the plans provided by the client at the time of issue of this report remain the same. A list of the documents provided by the client can be found in the table below.

Table: Documents provided by the client as of 22/09/25

Plans provided by the client as of 22/09/25
18.08.25 Preliminary Planning.pdf
22.09.25 70LVR.dwg

1 Introduction

1.1 ROAVR Group were commissioned to undertake a Preliminary Ecological Appraisal Report (PEAR) at 70 Lower Vicarage Rd, Kennington, Ashford TN24 9AS.

1.2 The survey was comprised of a desktop study, which was undertaken in October and a site survey, which was carried out by Antony Aslam on 06/10/25.

1.3 The methodology and results are outlined within the report. Where applicable, recommendations for suitable mitigation and ecological enhancements are provided.

1.4 The report is to be submitted to support a planning application. Full details of the proposals can be found on the planning portal.

1.5 The information and recommendations within this report have been prepared and provided in accordance with CIEEM's Code of Professional Conduct (CIEEM, 2022).

SITE DESCRIPTION

1.6 The survey site covers an area of approximately 0.16 hectares and is centred on grid reference 'TR 0145 6609'.

1.7 The site is situated in Kennington in the Ashford Borough Council area. It is

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located on the northern side of Ashford and is accessed from Lower Vicarage Road at No. 70.

1.8 The site is located within a residential area at 70 Lower Vicarage Road, Kennington, Ashford (TN24 9AS) and comprises a single residential plot with a detached bungalow (Building 1, B1) situated towards the northern boundary. B1 is a brick-built structure with a clay tile pitched roof in good structural condition, presenting well-sealed roof tiles and no visible potential roost features (PRFs) for bats. The immediate curtilage of the property includes a front and rear garden composed of modified grassland and ornamental planting, alongside areas of sealed hardstanding such as a patio and driveway. These areas fall within Habitat 3 (developed land, sealed surface) and Habitat 4 (vegetated garden).

1.9 To the rear of the fenced garden lies a disused, overgrown plot forming part of the development footprint. This area supports a mosaic of habitats, including modified grassland (Habitat 1), bramble (Rubus fruticosus agg.) scrub along the boundaries (Habitat 2), and occasional ruderal species. A loosely consolidated pile of rubble containing voids and overgrown with vegetation was noted on-site and could provide refugia for UK native fauna such as hedgehog (Erinaceus europaeus) or common reptile species. The site is otherwise largely enclosed and does not contain any waterbodies or mature trees. No additional buildings (B2) were identified within or immediately adjacent to the survey area.

DEVELOPMENT PROPOSALS

1.10 The proposed development comprises the erection of two single-storey residential dwellings (bungalows) to the rear of 70 Lower Vicarage Road. The scheme includes associated hardstanding for access and parking, as well as soft landscaping to integrate the new units within the existing residential context.

SCOPE OF WORKS

1.11 The aims of this assessment were to:

- identify the likely ecological constraints associated with the proposed development;
- identify suitable mitigation measures (if required);
- determine whether further surveys are necessary;
- identify opportunities for ecological enhancement

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2 Methodology

DESKTOP STUDY

2.1 Site-specific information concerning land designations, protected species and protected habitats within a 2km search area was sourced from DEFRA MAGIC and KMBRC.

2.2 In order to ensure that ecological data searches were up to date, species data was screened and all data records pre-2012 were omitted from the results.

2.3 Results of the desktop study should be considered to be indicative only.

UKHAB SURVEY

2.4 A Preliminary Ecological Appraisal, consisting of a site walkover and mapping was undertaken by Antony Aslam on 06/10/25. The PEA was undertaken in line with CIEEM's 'Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017). Antony has been completing preliminary ecological appraisals for a number of years and regularly undertakes surveys of this scale. He has received professional training in all aspects covered in this report.

2.5 The survey was conducted from the ground. Habitats and features of importance were mapped using a GPS-enabled handset.

2.6 A Site Habitat Map was produced in accordance with the UK Habitat Classification Manual (Butcher et al., 2020). (Appendix 3).

PRELIMINARY BAT ROOST ASSESSMENT (PRA)

2.7 A Preliminary Roost Assessment, consisting of a preliminary ground level roost assessment was undertaken during the site survey on 06/10/25. The PRA was undertaken in line with the Bat Conservation Trust's 'Bat Surveys for Professional Ecologists: Best Practice Guidelines' (Collins, 2023).

2.8 The survey included an active search for evidence of bats (such as droppings, feeding remains, urine splatters, oil staining, bat fur and/or scratch marks) and potential roosting features (PRFs). PRFs of trees are listed in Table 2.10.1. PRFs of built structures are listed in Table 2.8.1. The lists are not exhaustive but show examples of the most commonly used roosting features of built structures and trees.

Table 2.8.1: Potential roosting features (PRFs) in built structures listed in Bat Conservation Trust's 'Bat Surveys for Professional Ecologists: Best Practice Guidelines' (Collins, 2023).

Potential roosting features (PRFs) in built structures	
External	Internal
- Access/egress through windowsills,	- Behind wooden panelling;

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Potential roosting features (PRFs) in built structures	
External	Internal
window panes and walls; - Behind peeling paintwork or lifted rendering; - Behind hanging tiles; - Weatherboarding; - Eaves; - Soffit boxes; - Fascias; - Lead flashing; - Gaps under felt (even including those of flat roofs); - Under tiles/slates; - Existing bat boxes; - Gaps in brickwork or stonework which provide access/egress to cavity or rubble-filled walls	- In lintels above doors and windows; - Behind window shutters and curtains; - Behind pictures, posters, furniture, peeling paintwork, peeling wallpaper, lifted plaster and boarded windows; - Inside cupboards and in chimneys accessible from fireplaces; - Within attic roof voids; - The top of gable end or dividing walls; - The top of chimney breasts; - Ridge and hip beams and other roof beams; - Mortise and tenon joints; - All beams; - The junction of roof timbers, especially where ridge and hip beams meet; - Behind purlins; - Between tiles and the roof lining; - Under flat felt roofs

GROUND LEVEL TREE ASSESSMENT (GLTA)

2.9 A Preliminary Bat Roost Assessment, consisting of a preliminary ground level roost assessment was undertaken by Antony Aslam during the site survey on 06/10/25. The GLTA was undertaken in line with the Bat Conservation Trust's 'Bat Surveys for Professional Ecologists: Best Practice Guidelines' (Collins, 2023).

2.10 The survey included an active search for evidence of bats (such as droppings, feeding remains, urine splatters, oil staining, bat fur and/or scratch marks) and potential roosting features (PRFs). PRFs of trees are listed in Table 2.10.1. The lists are not exhaustive but show examples of the most commonly used roosting features of trees.

Table 2.10.1: Potential roosting features (PRFs) in trees listed in Bat Conservation Trust's 'Bat Surveys for Professional Ecologists: Best Practice Guidelines' (Collins, 2023) Table 6.6.

Table 2.10.1. PRF types that can be exploited by bats and how they form (adapted from Bat Roosts in Trees, BTHK, 2018) reproduced from Table 6.6. (Collins, 2023.)		
PRFs formed by disease and decay	*PRFs formed by damage*	*PRFs formed by association*
• *Woodpecker holes* • *Squirrel holes* • *Knot holes* • *Pruning cuts* • *Tear outs* • *Wounds* • *Cankers* • *Compression forks*	• *Lighting strikes* • *Hazard beams* • *Subsidence* • *Cracks* • *Shearing cracks* • *Transverse snaps* • *Welds* • *Lifting bark*	• *Fluting* • *Ivy*

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Table 2.10.1. PRF types that can be exploited by bats and how they form (adapted from Bat Roosts in Trees, BTHK, 2018) reproduced from Table 6.6. (Collins, 2023.)		
PRFs formed by disease and decay	*PRFs formed by damage*	*PRFs formed by association*
• *Butt rots*	• *Desiccation* • *Fissures* • *Frost cracks*	

Table 2.10.2. Guidelines for assessing the suitability of trees on proposed development sites for bats, to be applied using professional judgement.reproduced from Table 6.6. (Collins, 2023.)	
Suitability	*Description*
NONE	*Either no PRFs in the tree or highly unlikely to be any*
FAR	*Further assessment required to establish if PRFs are present in the tree*
PRF	*A tree with at least one PRF present*

2.11 A Site PRF Map was produced to show the location of built structures, trees and potential roosting features (PRFs). Habitats and features of importance were mapped using a GPS enabled handset.

SUITABILITY ASSESSMENT

2.12 The likelihood of occurrence of protected ecological features and species was ranked in accordance with the criteria listed in Tables 2.12.1 and 2.12.2. Likelihood of occurrence was assessed using data collected during the desk study and after evaluation of the habitats on-site (during the site survey) as to their likelihood to provide suitability for protected species (i.e. presence of breeding, nesting, roosting, foraging, commuting and/or refuge habitat for example).

Table 2.12.1: Criteria used to assess the likelihood of occurrence for protected ecological features and species on-site (excl. bats).

Likelihood of occurrence	Criteria
Present	Confirmed as present during the site survey or by confirmed historical records.
High	Species are known to be present within close proximity to the site (records present). Habitats on-site are of high quality for the species and/or likely to support a large population. The site is well connected to good quality habitat within the local area.

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Likelihood of occurrence	Criteria
Moderate	Species are known to be present within the local area (records present). Habitats on-site are of moderate quality for the species and/or likely to support a moderate population. The site and connected habitats provide all of the ecological requirements of the species. The suitability of habitats on-site may be limited due to disconnectivity to the wider landscape, poor to moderate habitat available within the wider locality, and/or due to the presence of only a small area of suitable habitat.
Low	Few or no records of the species within the local area. Habitats on-site are of poor quality for the species and/or likely to support just a few individuals. The suitability of habitats may be limited due to disturbance, isolation and/or poor quality habitat available within the wider locality. However, species presence cannot be discounted due to the national distribution of the species or the nature of on-site and surrounding habitats (if all required ecological requirements for the species are present).
Negligible	While presence cannot be discounted, the site includes very limited or poor-quality habitat for a particular species. Connected habitats do not fulfil the ecological requirements of the species. There are no local records and/or the site is outside the known national range of the species.

Table 2.12.2: Criteria used to assess the likelihood of occurrence (site's suitability) for bats, from Bat Conservation Trust's 'Bat Surveys for Professional Ecologists: Best Practice Guidelines' (Collins, 2023) (Table 4.1.)

Potential suitability	Description	
	Roosting bats	Potential flight paths and foraging habitats
None	No habitat features on-site likely to be used by any roosting bats at any time of the year (i.e a complete absence of crevices / suitable shelter at all ground/underground levels).	No habitat features on-site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight lines, or generate/shelter insect populations available for foraging bats).
Negligible	No obvious habitat features on-site are likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and unsuitable features on occasion.	No obvious habitat features on-site likely to be used as flight paths or by foraging bats; however, a small element of uncertainty remains to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used regularly or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).	Habitat that could be used by small numbers of commuting bats but isolated (i.e. not very well connected to the surrounding landscape by other habitat). Suitable, but isolated habitat that could be used by small numbers of bats for foraging such as a lone tree (not in a parkland situation) or a patch of scrub.

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Potential suitability	Description	
	Roosting bats	Potential flight paths and foraging habitats
	A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.	
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, appropriate conditions and/or suitable surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only - with respect to roost type only).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees or linked back gardens. Habitat that is connected to the wider landscape that could be used for bats for foraging such as trees, scrub, grassland or water.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitats. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation sites.	Continuous, high-quality habitat that is well connected to the wider landscape and is likely to be used regularly by commuting bats. High-quality habitat that is well connected to the wider landscape is likely to be used regularly by foraging bats. The site is close to and connected to known roosts.

ECOLOGICAL CONSTRAINTS AND MITIGATION

2.13 An evaluation of the potential ecological constraints to the proposed development and appropriate mitigation strategies was made following CIEEM's 'Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018).

LIMITATIONS

2.14 Only one site visit was undertaken, therefore, a full evaluation of species present throughout the year could not be made. Therefore, there were seasonal constraints to species identification. However, the data collected during the site survey was sufficient to make an appropriate assessment of the site.

2.15 The site maps shown in Appendix 3 were produced from an Ordnance Survey Tile purchased from our mapping supplier. A site walkover with a GPS enabled handset was used to inform the location and extent of existing habitats shown on the appended mapping and is as accurate as possible but some error must be allowed for without a full topographical survey.

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3 Policy and Legislative Context

3.1 This section includes the legislative context of those protected species or other notable species that are recorded on-site or have the potential to be present on-site. Details on specific legislation for other protected or notable species that have not been identified as being present, or having the potential to be present, are not included below.

NATIONAL PLANNING POLICY

3.2 The introduction of the National Planning Policy Framework (NPPF) in March 2012 sets out the Government's planning policies for England and how these are expected to be applied in the presumption in favour of sustainable development. It sets out the Government's requirements for the planning system, only to the extent that it is relevant, proportionate and necessary to do so and is a material consideration for local planning authorities in determining applications.

3.3 Planning Practice Guidance is relevant covering the Natural Environment alongside the NPPF. Therefore features of ecological value should be considered in the context of conserving and enhancing the natural environment.

3.4 The Government's objectives for planning are to promote sustainable development, to conserve, enhance and restore the diversity of England's wildlife and geology and to contribute to rural renewal and urban renaissance.

LOCAL PLANNING POLICY

3.5 This report has been commissioned in order to comply with policies ENV1, ENV2, ENV4, ENV5, ENV14.

https://www.ashford.gov.uk/planning-and-development/our-planning-policies/current-local-plans/ashford-local-plan-2030/

NATIONAL AND INTERNATIONAL LEGISLATION

3.6 Bern Convention on the Conservation of European Wildlife and Natural Habitats (1982)

3.7 Convention on the Conservation of Migratory Species of Wild Animals (1983)

3.8 Countryside and Rights of Way Act (2000)

3.9 National Parks and Access to the Countryside Act (1949)

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3.10 Natural Environment and Rural Communities Act (2006)

3.11 Protection of Badgers Act (1992)

3.12 The Conservation of Habitats and Species Regulations (2017)

3.13 The Convention of International Trade in Endangered Species of Wild Fauna and Flora (1975)

3.14 The Hedgerows Regulations (1997)

3.15 UK Biodiversity Action Plan (1994)

3.16 Wildlife and Countryside Act (1981)

3.17 Wild Mammals (Protection) Act (1996)

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4 Desktop Study

SITE DESIGNATIONS

4.1 There is one designated site within the 2km search area.

Table 4.1.1: Designate sites recorded within a 2km radius of the survey site.

Site Name	Grid Reference	Area (ha)	Approx. Closest Distance from Site (km)
Ashford Green Corridors LNR	TR 012 419	47.41	1.55

*Data from DEFRA MAGIC

Table 4.1.2: Local wildlife sites recorded within a 2km radius of the survey site.

Site Name	Grid Reference	Area (ha)
Conningbrook Lakes and East Stour River Corridor	TR028428	101.4
Kennington Gravel Pits	TR018446	9.7
The Pastures	TR019435	1.1
Henwood Industrial Estate	TR025424	0.8
Court Lodge Farm Fields	TR033446	3.8

*Data from KMBRC

LOCAL HABITAT

4.2 There were more than 50 priority habitats that were formerly mapped within the 2km search area.

Table 4.2.1: Closest and different priority habitats formerly mapped within a 2km radius of the survey site.

Habitat	Approx. Closest Distance from Site (km)
Deciduous Woodland	0.19
Lowland dry acid grassland	1.15

*Data from DEFRA MAGIC

4.3 There were 2 standing water bodies situated within a 500m radius of the survey site.

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HISTORICAL SPECIES RECORDS

4.4 Protected species records relating to the site and 2km search area were obtained from the KMBRC as part of the desktop study. The data search contains confidential information that is not suitable for public release. Therefore, the data has not been included in the report.

4.5 A full list of identified species recorded within the 2km search area can be requested from KMBRC.

4.6 The absence of identified records does not discount the presence of a species. An absence of identified records is primarily a result of a lack of survey or the non-submission of records. Furthermore, historical records of species do not confirm their current presence within an area.

4.7 There are 44 records of bats within 2 km of the site, including common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*), brown long-eared bat (*Plecotus auritus*), and unidentified *Pipistrellus* spp.

4.8 There are 22 records of terrestrial mammals within 2 km of the site, including hedgehog (Erinaceus europaeus) and European mole (Talpa europaea).

4.9 There are 10 records of amphibians within 2 km of the site, including great crested newt (*Triturus cristatus*), smooth newt (*Lissotriton vulgaris*), and common frog (*Rana temporaria*).

4.10 There are 8 records of reptiles within 2 km of the site, including slow worm (*Anguis fragilis*) and common lizard (*Zootoca vivipara*).

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5 Site Survey

5.1 The site survey was undertaken on 06/10/25. The weather conditions were considered to be appropriate to survey (Table 5.1.1).

Table 5.1.1: Weather conditions at the time of survey.

Date of site survey:06/10/2025	
Temperature	Weather conditions during the survey were dry, with a temperature of 14°C
Wind	Light breeze from the west
Precipitation	There was no precipitation recorded at the time of the survey

*Data from BBC Weather.

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5.2 Site and building description:

The site is located within a residential area at 70 Lower Vicarage Road, Kennington, Ashford (TN24 9AS) and comprises a single residential plot with a detached bungalow (Building 1, B1) situated towards the northern boundary. B1 is a brick-built structure with a clay tile pitched roof in good structural condition, presenting well-sealed roof tiles and no visible potential roost features (PRFs) for bats. The immediate curtilage of the property includes a front and rear garden composed of modified grassland and ornamental planting, alongside areas of sealed hardstanding such as a patio and driveway. These areas fall within Habitat 3 (developed land, sealed surface) and Habitat 4 (vegetated garden).

To the rear of the fenced garden lies a disused, overgrown plot forming part of the development footprint. This area supports a mosaic of habitats, including modified grassland (Habitat 1), bramble (Rubus fruticosus agg.) scrub along the boundaries (Habitat 2), and occasional ruderal species. A loosely consolidated pile of rubble containing voids and overgrown with vegetation (Target Note 1) was noted on-site and could provide refugia for UK native fauna such as hedgehog (Erinaceus europaeus) or common reptile species. The site is otherwise largely enclosed and does not contain any waterbodies or mature trees. No additional buildings (B2) were identified within or immediately adjacent to the survey area.

The northern elevation of Building 1 (B1) faces the front of the property and is composed of solid brickwork with uPVC-framed windows and a gable end beneath a pitched clay tile roof. The structure appears well maintained with tight mortar courses and no evidence of cracks or crevices suitable for access by bats or nesting birds. No climbing vegetation or ivy was observed on this elevation, reducing the suitability for concealment by invertebrates or small mammals. The lack of ledges, soffits, or significant architectural features further limits ecological value.

The eastern elevation overlooks the side garden and boundary of the plot. It consists of uninterrupted brickwork with minimal external features. One small service vent was noted at low level; however, this appeared fully sealed and poses negligible potential as a wildlife entry point. There are no open gaps or overhangs, and the elevation is broadly exposed to the weather, which reduces its attractiveness to roosting bats or nesting birds.

The southern elevation, facing the rear garden, includes a large window and access door opening onto a paved patio. The elevation is again constructed of tightly sealed brickwork with no visible signs of decay or structural gaps. The eaves are flush

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and well sealed, with no gaps observed. While the adjoining garden may offer foraging opportunities for birds or invertebrates, the elevation itself does not present features suitable for ecological use.

The western elevation mirrors the opposite side and comprises plain brickwork with no structural complexity. No signs of bird nesting, wasp nests, or bat activity (e.g. staining, droppings) were noted, and the condition of the building fabric is sound. A small overhang of the roof tiles is present, but it is flush with no gaps or lifted tiles, making the elevation of negligible ecological importance.

The roof is a pitched, clay-tiled structure in good condition, with tiles tightly fitted across all elevations. No lifted, broken, or missing tiles were noted during the survey (see photos Habitat 3), and there are no visible features such as gaps at the ridge or verge tiles that could provide roosting opportunities for bats. The roof structure, as recorded, offers negligible potential for roosting and is not considered a constraint to the development proposals.

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5.3 A description of habitat present along with target notes is shown in Table 5.3.1. The location of habitats is shown in the Site Habitat Map, Appendix 3.

Table 5.3.1: Description of habitats present on-site (please also see the Site Habitat Map, Appendix 3).

Habitats and Target Notes	Description	Supporting Photo
Habitat 1	g4: Modified grassland This habitat is located within the central and southern portions of the disused rear plot and is characterised by a sward dominated by coarse and patchy grasses indicative of a frequently disturbed and nutrient-enriched substrate. Dominant species include perennial ryegrass (Lolium perenne), with occurrences of creeping bent (Agrostis stolonifera) and false oat-grass (Arrhenatherum elatius) visible within less frequently disturbed patches. The herbaceous layer is limited but supports frequent broad-leaved dock (Rumex obtusifolius), common nettle (Urtica dioica), and occasional dandelion (Taraxacum officinale agg.). Vegetation height and composition appear consistent with periodic management in the past, likely through mowing or sporadic clearance, but the area is now evidently unmanaged and undergoing early successional change. The grassland displays low species diversity and limited structural heterogeneity, readily identifiable from both ground-level. Its floristic composition and nutrient status are typical of modified grassland occurring on ex-garden or informal amenity land. Ecological value is considered low; however, the habitat may provide low-quality foraging opportunities for	

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Habitats and Target Notes	Description	Supporting Photo
	invertebrates, birds, and small mammals. The proximity of scrub edge habitats marginally improves heterogeneity but does not elevate its conservation status.	 

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Habitats and Target Notes	Description	Supporting Photo
		

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Habitats and Target Notes	Description	Supporting Photo
Habitat 2	h3d: Bramble scrub This habitat is primarily confined to the boundary margins of the disused rear plot, forming dense linear stands along the northern and western edges. It is dominated by bramble (Rubus fruticosus agg.), which forms a near-continuous thicket in several areas, with vegetation structure ranging from low sprawling growth to upright arches exceeding 1.5 metres in height. The presence of occasional emergent species such as hawthorn (Crataegus monogyna) and young sycamore (Acer pseudoplatanus) indicates early successional woodland development in the absence of active management. Ground flora is shaded and sparse due to the dominance of dense bramble cover but includes common nettle (Urtica dioica), cleavers (Galium aparine), and occasional cow parsley (Anthriscus sylvestris) along more open fringes. The habitat provides moderate ecological function in the form of cover, shelter, and foraging resources for a range of UK native fauna including small mammals, nesting birds, and invertebrates. The structural complexity and microhabitats (e.g. leaf litter and low canopy arching over bare soil) afford suitable conditions for hedgehog (Erinaceus europaeus) and potentially widespread reptile species such as slow worm (Anguis fragilis), particularly where transitional zones abut adjacent modified grassland. Conservation value remains low to moderate, depending on landscape connectivity and species usage.	 

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Habitats and Target Notes	Description	Supporting Photo
		 

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Habitats and Target Notes	Description	Supporting Photo
Habitat 3	u1b: Developed land – sealed surface This habitat encompasses the hardstanding areas across the survey site including the patio, driveway, and ancillary paved sections surrounding the main dwelling. These surfaces are entirely man-made and impervious, comprising concrete paving slabs, tarmac, and other compacted materials. Vegetation is largely absent with only occasional colonisation by ruderal or pioneer species in cracks or along edges, such as buddleia (Buddleja davidii), nipplewort (Lapsana communis), and creeping thistle (Cirsium arvense), reflecting a low level of ecological succession. Due to its sealed and artificial nature, this habitat offers negligible ecological value in terms of flora. However, at interfaces with vegetated areas, such structures may occasionally provide basking opportunities for reptiles or foraging corridors for invertebrates. Ecological function is otherwise highly limited. This habitat type should be classed as of negligible importance to nature conservation.	 

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Habitats and Target Notes	Description	Supporting Photo
		

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Habitats and Target Notes	Description	Supporting Photo
Target Notes	TN1: A loosely consolidated pile of broken concrete, mixed rubble, compacted soil, and inert construction debris located within the disused rear portion of the site. The feature supports overgrowing vegetation including common nettle (Urtica dioica), bramble (Rubus fruticosus agg.), and wall speedwell (Veronica arvensis), which provide surface cover and increase concealment value. The pile includes several cavities and sheltered crevices, offering potential refugia for common reptiles such as slow worm (Anguis fragilis) or common toad (Bufo bufo), as well as shelter or temporary nest sites for hedgehog (Erinaceus europaeus), a UK BAP Priority Species. While no direct evidence of fauna was observed at the time of survey, the structure's composition and vegetative cover make it suitable as a transient or overwintering habitat feature for a range of low-disturbance-tolerant terrestrial species.	

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Habitats and Target Notes	Description	Supporting Photo
		

PRELIMINARY BAT ROOST ASSESSMENT (PRA)

5.4 There were no built structures on site capable of supporting roosting bats.

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6 Evaluation and Assessment

6.1 Results from the desktop study and site survey were evaluated to assess the likelihood of occurrence for protected ecological features and species potential (as per Table 2.12.1). An evaluation of the potential impacts due to the proposed development and recommendations for appropriate mitigation measures are provided in Table 6.1.1.

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Protected Species Likelihood:

Protected feature or species: *Roosting bats*
Likelihood of occurrence or suitability: *Negligible*
Comments and justifications: *Building 1 (B1) is a well-sealed, modern brick structure with tightly fitted clay tiles, no lifted or missing tiles, gaps, soffits or potential roost features noted during inspection (see photos IMG_2110–IMG_2113). No other buildings or mature trees present within the site.*
Impacts due to the proposed development: *None anticipated*
Required mitigation measures: *No surveys or specific mitigation required. Site should be kept under occasional review during works in line with good practice guidance.*

Protected feature or species: *Foraging/commuting bats*
Likelihood of occurrence or suitability: *Low*
Comments and justifications: *Site located within a suburban residential area with limited habitat connectivity. Scrub and garden vegetation offers very limited foraging opportunities, with no linear features or waterbodies on or adjacent to the site.*
Impacts due to the proposed development: *Neutral to negligible loss of low-value foraging habitat*
Required mitigation measures: *None required. Exterior lighting strategy, if proposed, should comply with Bat Conservation Trust guidelines to minimise light spill onto retained vegetated boundaries.*

Protected feature or species: *Badgers (Meles meles)*
Likelihood of occurrence or suitability: *Negligible*
Comments and justifications: *No evidence of setts, pathways, latrines or foraging signs observed. The site is enclosed by residential development with low connectivity to wider habitats.*
Impacts due to the proposed development: *None anticipated*
Required mitigation measures: *No further action required. Any excavations during construction to be backfilled daily or fitted with escape ramps as a precaution.*

Protected feature or species: *Hedgehog (Erinaceus europaeus)*
Likelihood of occurrence or suitability: *Moderate*
Comments and justifications: *Pile of rubble, bramble scrub, boundary vegetation and cavity (TN1) provide potential daytime shelter and foraging habitat. Species recorded locally and widely distributed across Kent.*
Impacts due to the proposed development: *Potential loss of terrestrial refuge and injury risk during site clearance.*
Required mitigation measures: *Sensitive clearance of TN1 under supervision. Gaps to be retained or installed at base of new boundary features (13cm x 13cm) to allow movement through site. Night works and light spill to be minimised where possible.*

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Protected feature or species: *Amphibians*
Likelihood of occurrence or suitability: *Low*
Comments and justifications: *No standing water present on or adjacent to site. Modified grassland and rubble offer limited refuge suitable for common species such as common frog (Rana temporaria). No records of great crested newt (Triturus cristatus) within 250m per local distribution.*
Impacts due to the proposed development: *Low risk of disturbance during vegetation and rubble clearance*
Required mitigation measures: *Precautionary clearance of rubble piles and scrub during active season (March to October). Any amphibians found to be relocated manually to suitable retained habitat onsite or nearby.*

Protected feature or species: *Reptiles*
Likelihood of occurrence or suitability: *Moderate*
Comments and justifications: *TN1 and boundary bramble scrub in combination with modified grassland provide warm sheltered features typical of lowland reptile habitat. Species such as slow worm (Anguis fragilis) and common lizard (Zootoca vivipara) present in surrounding landscape.*
Impacts due to the proposed development: *Potential killing or injury during site clearance*
Required mitigation measures: *Habitat suitability suggests requirement for presence/likely absence survey in line with Froglife (1999) and Natural England standing advice. If found present, site clearance under supervised phased method with displacement strategy.*

Protected feature or species: *Otter (Lutra lutra)*
Likelihood of occurrence or suitability: *Negligible*
Comments and justifications: *No watercourses on or adjoining site. Site is entirely suburban; no habitat suitable for this species. Outside of core range of regular occurrence.*
Impacts due to the proposed development: *None anticipated*
Required mitigation measures: None required

Protected feature or species: *Water vole (Arvicola amphibius)*
Likelihood of occurrence or suitability: *Negligible*
Comments and justifications: *No aquatic habitat present; unsuitable terrestrial vegetation. No signs of burrows nor feeding remains.*
Impacts due to the proposed development: *None anticipated*
Required mitigation measures: *None required*

Protected feature or species: *Dormouse (Muscardinus avellanarius)*
Likelihood of occurrence or suitability: *Negligible*
Comments and justifications: *No structurally complex woodland, hedgerow, or connected canopy vegetation. Outside the high-suitability range in Kent.*

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Impacts due to the proposed development: *None anticipated*
Required mitigation measures: *None required*

Protected feature or species: *Nesting birds*
Likelihood of occurrence or suitability: *Moderate*
Comments and justifications: *Bramble scrub, ruderal vegetation and boundary features present nesting opportunities for common bird species such as blackbird (Turdus merula) and robin (Erithacus rubecula).*
Impacts due to the proposed development: *Potential destruction of active nests during clearance*
Required mitigation measures: *All vegetation clearance to be undertaken outside nesting bird season (March–August inclusive) or following pre-clearance check by an ecologist.*

Protected feature or species: *Invertebrates*
Likelihood of occurrence or suitability: *Low*
Comments and justifications: *Limited floristic diversity and structural variation across site. Rubble pile (TN1) may offer shelter to ground-active species, but site lacks resources for notable assemblages. No habitat features indicating presence of priority species.*
Impacts due to the proposed development: *Minor localised loss of habitat*
Required mitigation measures: *General retention of soft landscaping in finished scheme to support pollinators; use of nectar-bearing species in landscape specifications encouraged.*

Protected feature or species: *Invasive species*
Likelihood of occurrence or suitability: *Negligible*
Comments and justifications: *No evidence of Schedule 9 invasive plant species such as Japanese knotweed (Fallopia japonica) or Himalayan balsam (Impatiens glandulifera) seen during survey.*
Impacts due to the proposed development: *None anticipated*
Required mitigation measures: *No action required. Should invasive species be identified during works, appropriate control procedures as per Environment Agency Guidance must be followed.*

Protected feature or species: *Terrestrial mammals (non-protected)*
Likelihood of occurrence or suitability: *Low*
Comments and justifications: *Vegetation and rubble features suitable for small rodents such as wood mouse (Apodemus sylvaticus). No features present likely to support significant populations or protected status.*
Impacts due to the proposed development: *Minor displacement associated with vegetation clearance*
Required mitigation measures: *Standard good practice during site preparation including slow directional clearance towards retained vegetated zones.*

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Protected feature or species: *Common and widespread mammals*
Likelihood of occurrence or suitability: *Moderate*
Comments and justifications: *Garden and scrub habitats provide opportunities for fox (Vulpes vulpes), grey squirrel (Sciurus carolinensis), and other common species in suburban settings. No evidence of resting sites.*
Impacts due to the proposed development: *Temporary disturbance and displacement*
Required mitigation measures: *General site hygiene to be maintained. Secure storage of materials and waste to prevent opportunistic colonisation or attraction during works.*

Potential Impacts & Mitigation Recommendations:

The proposed development at 70 Lower Vicarage Road, Kennington, Ashford (TN24 9AS) is situated within a residential plot comprising a well-maintained bungalow (B1), associated hardstanding, gardens, and a disused rear area supporting modified grassland, bramble scrub and rubble (TN1). The site supports habitats of low to moderate ecological value, with no evidence of high-value features such as veteran trees, watercourses or statutory designations. However, the survey has identified features of some importance to common and protected species including nesting birds, hedgehogs, and reptiles. In accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) guidelines and current legislation including the Wildlife and Countryside Act 1981 (as amended), and the Conservation of Habitats and Species Regulations 2017 (as amended), the following potential impacts and mitigation measures are advised:

- Vegetation and rubble present on-site, notably TN1, may offer shelter for protected species such as hedgehogs and reptiles. Clearance activities should be timed and undertaken sensitively to avoid harm, following appropriate survey or displacement methodologies.

- The presence of bramble scrub and marginal vegetation has potential to support nesting birds. Any vegetation clearance should avoid the breeding season (March to August inclusive) or be preceded by a pre-clearance check by a suitably qualified ecologist.

- No buildings or structures displayed potential for roosting bats, and no waterbodies or aquatic vegetation are present to support amphibians or aquatic mammals. As such, further protected species survey effort is not currently required for bats or other aquatic species.

- Although reptile habitat is limited, the presence of suitable refugia in combination with local records suggests that a presence/likely absence survey should be undertaken prior to site clearance, in accordance with Froglife Advice Sheet 10 and Natural England standing advice.

- Mitigation for hedgehogs should include retention or installation of permeability features such as small access gaps (13cm x 13cm) at the

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base of boundary fences or walls.

- Sensitive management practices, such as phased vegetation clearance and maintenance of clean working areas, should be adopted throughout the development phase to minimise broader impacts on fauna such as small mammals, birds and invertebrates.

- Any future lighting scheme should follow Bat Conservation Trust guidance (BCT, 2018) to reduce potential impact on nocturnal wildlife and retained vegetation corridors.

These recommendations are proportionate with the scale of development and ecological baseline recorded and align with CIEEM guidance for the mitigation hierarchy: avoid, mitigate, compensate. Continued adherence to these measures will ensure compliance with legislation and good practice standards, supporting a lawful and ecologically responsible approach to site development.

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Table 6.1.1: Likelihood of occurrence of protected ecological features and species on-site, potential impacts due to the proposed development and recommendations for appropriate mitigation measures.

Protected feature / species	Likelihood of occurrence / suitability	Comments / Justification	Impact due to Proposed Development	Required Mitigation Measures
Protected sites	Negligible	The site is not situated within, or adjacent to, any known protected sites. The site is not considered to be well connected to any known protected sites.	None anticipated.	None required. Standard construction controls (Heras fencing) to confine works areas.
Protected habitats	Negligible	On-site habitats comprise modified grassland, bramble scrub, garden and developed land, no HPI mapped on or adjacent to the site.	None anticipated.	None required beyond good practice.
Protected plant species	Low	There are no known records of protected plant species within 2km of the site. No protected plant species were observed during the site survey. Habitats on-site are not considered to be unique or of high quality to support protected plant species. However, their presence cannot be entirely discounted.	The site does not appear to support protected plant species, thus, the proposed development is unlikely to impact upon protected plant species.	None required. If any protected plants are discovered, stop works and seek ecologist advice.
Invasive plant species	Negligible–Low	No invasive species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were	Potential if present and spread by works.	If identified, implement appropriate control per EA guidance, biosecurity to prevent spread.

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Protected feature / species	Likelihood of occurrence / suitability	Comments / Justification	Impact due to Proposed Development	Required Mitigation Measures
		found during the survey. As there were seasonal constraints to plant identification, it is possible that invasive plant species are present and have yet to be identified.		
Roosting bats (buildings)	Negligible	B1 is a well-sealed modern bungalow with tightly fitted clay tiles, no PRFs noted, no other buildings or mature trees on site.	None anticipated.	No bat surveys or specific mitigation required. Maintain occasional ecological checks during work.
Reptiles (slow-worm or common lizard)	Low	TN1 + bramble edges with modified grassland provide suitable lowland reptile habitat, local records in wider area.	Potential killing or injury during clearance.	Low risk managed by PMW, no surveys required.
Hedgehog (Erinaceus europaeus)	Moderate	TN1 rubble pile, bramble and boundary vegetation provide potential refuge or foraging.	Risk of injury or kill during clearance, loss of small refuges.	Sensitive clearance of TN1 and scrub, provide or retain 13 cm × 13 cm fence gaps, minimise night working or light spill.
Nesting birds	Moderate	Bramble, ruderal, boundary vegetation provides nesting opportunities for common species (e.g. blackbird, robin).	Possible destruction of active nests if cleared in season.	Avoid clearance Mar–Aug (inclusive) or undertake pre-clearance check by ecologist, protect any active nests until fledging.
Common & widespread mammals (fox, grey squirrel, etc.)	Moderate	Suburban gardens or scrub offer occasional use, no resting sites found.	Temporary disturbance or displacement.	Maintain site hygiene, prevent harbourage (secure materials or waste).

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7 Biodiversity Enhancements

7.1 The development should be used as an opportunity for biodiversity net gain, by creating new opportunities for wildlife.

BIRDS

7.2 Avoid clearance Mar–Aug (inclusive) or undertake pre-clearance check by ecologist, protect any active nests until fledging.

HERPTILES

7.3 Undertake a reptile PMW: two-stage strim (to 150 mm then 50 mm) in suitable weather (≥ 9 – 10 °C, April–October), hand-search and lift rubble or boards carefully, directional clearance towards retained vegetated margins, toolbox talk to contractors, and ecologist watching brief during removal of TN1. If reptiles are encountered in numbers, pause works and seek ecologist advice.

INVERTEBRATES

7.4 Fruit trees make ideal habitat for many invertebrate species. Thus, it is recommended to plant new garden ornamental fruit trees on-site. For example, Crab Apple (*Malus sylvestris*), Wild Cherry (*Prunus avium*) and Common Pear (*Pyrus communis*).

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8 Conclusions

8.1 The site at 70 Lower Vicarage Rd, Kennington, Ashford TN24 9AS is to be redeveloped with The proposed development comprises the erection of two single-storey residential dwellings (bungalows) to the rear of 70 Lower Vicarage Road. The scheme includes associated hardstanding for access and parking, as well as soft landscaping to integrate the new units within the existing residential context.

8.2 The proposals remove small areas of low-distinctiveness habitat within the footprint, however, with embedded mitigation and the proposed landscaping, the scheme will deliver a measurable Biodiversity Net Gain of 11.50% (statutory metric), and no significant residual effects are anticipated.

ECOLOGICAL CONSTRAINTS

8.3 Development proposals must have regard for protected species identified as potentially occurring on, or near, the site (e.g., amphibians, birds, terrestrial mammals, and reptiles). Mitigation measures to protect these species have been produced within this report to ensure that the proposed works comply with relevant UK legislation.

MITIGATION STRATEGIES

8.4 Construction works should be limited to daylight hours (excl. dawn and dusk) in order to prevent disturbance to nighttime foraging activity.

8.5 Vegetation removal must be undertaken using hand tools. Cut vegetative materials should be checked and removed from site immediately.

8.6 Any trenches or other excavations left open overnight should be well covered to deter Badgers from entering. If this is not possible, any trenches or other excavations left open overnight should either be provided with an escape ramp (comprised of a sloped side or wooden plank reaching up to ground level or slightly above), to allow any wildlife that falls in to escape.

8.7 Any necessary excavation of animal burrows should be done carefully to avoid unnecessary suffering (such as crushing or asphyxiation).

8.8 During hibernation season (October to March), piles of leaf litter and logs should be retained to ensure hibernating hedgehogs are not harmed. If removal is unavoidable, the piles must be carefully checked before burning.

8.9 Post-construction, the use of artificial lighting should be limited where possible. Motion sensors on outside lighting will prevent prolonged disturbance. It is recommended that outside lighting be set on short-timers (1 minute) and that the sensitivity is set to large moving objects only.

8.10 Any newly built boundary features should incorporate ‘wildlife gaps’

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(comprising a 13x13cm gap at the base of the feature), to allow wildlife to pass through.

BIODIVERSITY NET GAIN

8.11 The project is to be used as an opportunity for biodiversity net gain by creating new opportunities for wildlife. New habitat creation is to be implemented on-site and should be included within the final project design.

Site Baseline

8.12 The on-site baseline biodiversity is calculated at **0.27 habitat units**. The habitats largely consist of modified grasslad.

Site As Proposed

8.13 Post-development, without intervention, the proposed plans will result in **0.31 habitat units** or a net gain of **13.72%**.

Recommended Actions

8.14 Development proposals reach the mandatory net gain in habitat units. In order to reach the 10% net gain in habitat units, a further **10 small urban trees** (maintained to a moderate condition) would need to be planted . This would produce an overall net gain of **13.72%** in habitat units.

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Appendix 1: Site Location and Assessment Boundary

Figure A1.1: Extract from Google Maps showing the site location. (Google, 2025).

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Figure A1.2: Extract from DEFRA MAGIC showing the assessment boundary. (MAGIC, 2025)

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Appendix 2: Desktop Study

*Data from DEFRA.

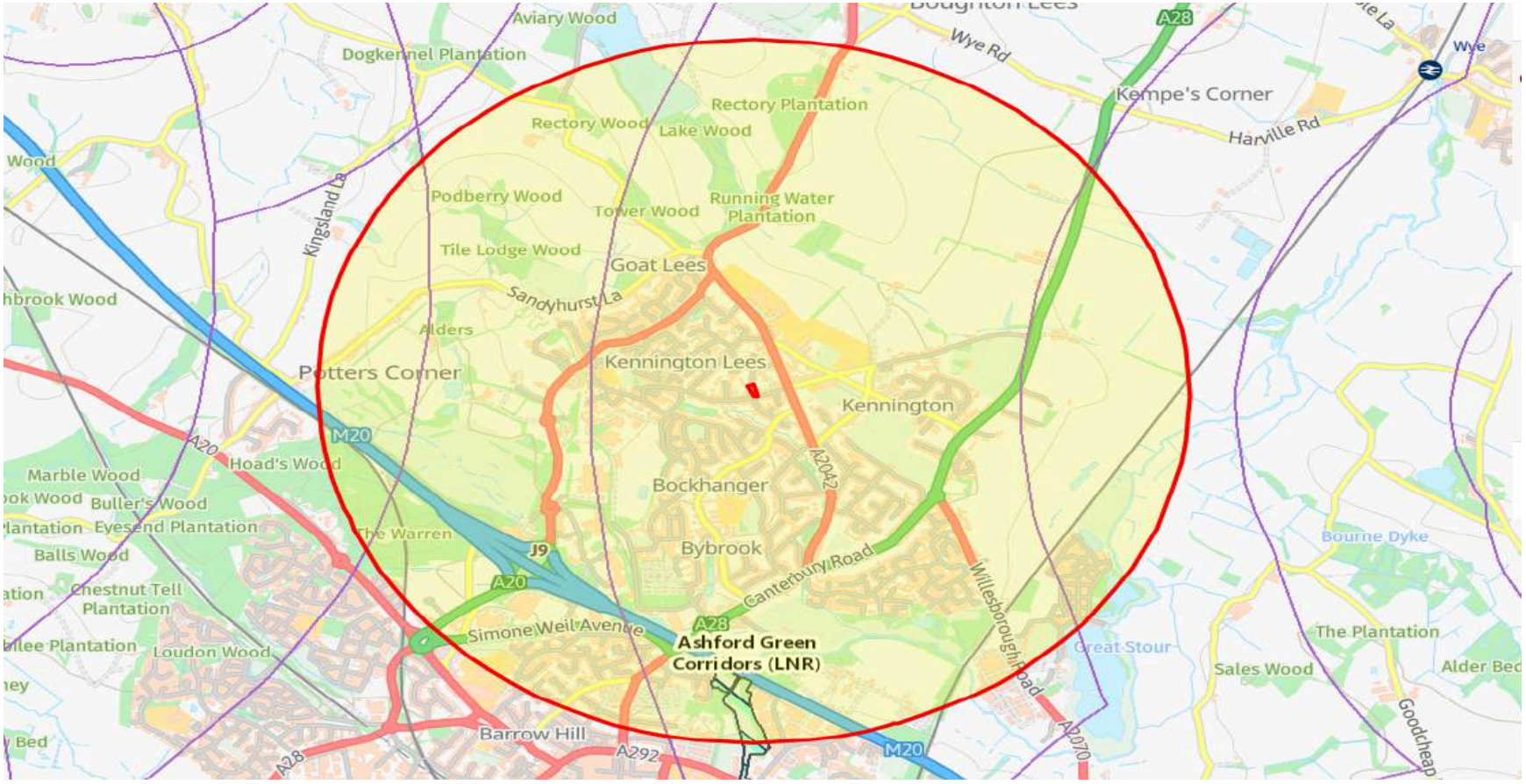

Figure A2.1: Location of designated sites situated within a 2km search radius of the site.

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*Data from DEFRA.

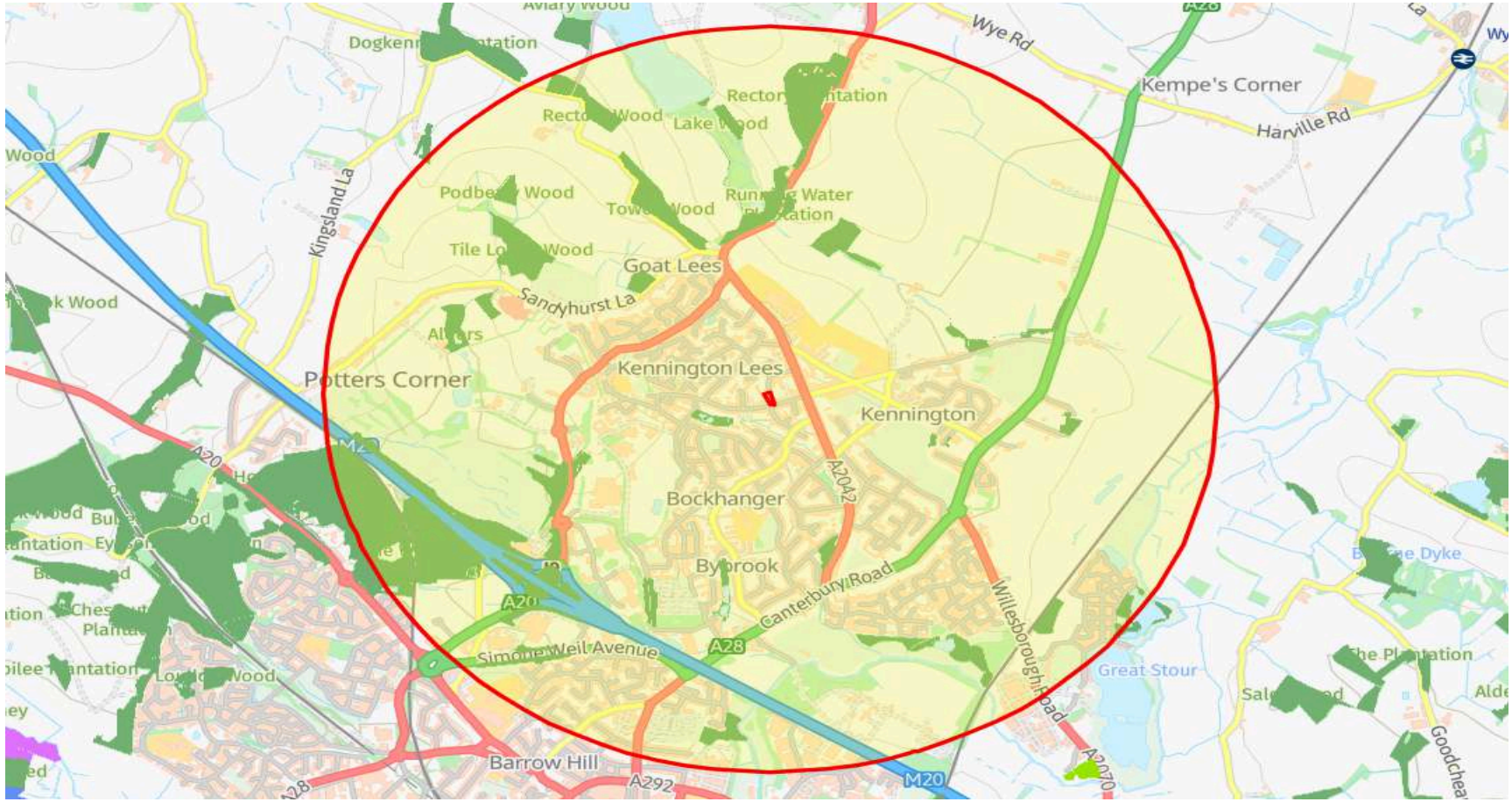

Figure A2.2: Priority habitats formerly mapped within a 2km search radius of the site.

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*Data from Bing Maps

Figure A2.3: Standing water bodies formerly mapped within a 500m search radius of the site.

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Appendix 3: Site Maps

A3.1 The Site Habitat Map was produced per the UK Habitat Classification Manual (Butcher et al., 2020).

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