



85 DUNES ROAD, GREATSTONE, KENT

BIODIVERSITY NET GAIN ASSESSMENT AND POTENTIAL ROOST ASSESSMENT

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BIODIVERSITY NET GAIN ASSESSMENT AND POTENTIAL ROOST ASSESSMENT

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1 INTRODUCTION

1.1.1 Evergreen Ecology Ltd was commissioned by Choice Support to undertake a Biodiversity Net Gain Assessment (BNGA) and Potential Roost Assessment (PRA) for the proposed demolition of an existing bungalow and construction of a new dwelling at 85 Dunes Road, Greatstone, New Romney, Kent, TN28 8SW; hereafter referred to as “the Site”.

1.1.2 This report details the results of the PRA and BNGA using biodiversity metric calculations which have been completed based on our current understanding of the development.

1.2 Site Description

1.2.1 The Site covers approximately 0.062 ha and is located within a semi-rural area in the north west of Greatstone (central Ordnance Survey Reference SP 1952 6448). The Site is a residential plot supporting a bungalow with outbuildings, drive, front and rear gardens. Baseline area habitats at the Site include Urban – developed land, sealed surface (u1b) and Grassland – vegetated garden (u~828), as shown in Appendix 1. The development will utilise existing access onto the residential plot.

1.3 Biodiversity Net Gain Assessment

1.3.1 Under the Environment Act 2021, developments are required to achieve 10% Biodiversity Net Gain (BNG) to ensure that biodiversity post-development is greater than that present pre-development.

1.3.2 BNG calculations are conducted through assessing the condition of habitats on a site and then comparing the anticipated changes in biodiversity value based on the development proposals. A BNGA follows the mitigation hierarchy, which sets out that everything possible must be done to firstly avoid, secondly minimise and thirdly restore/rehabilitate losses of biodiversity on-site. Only as a last resort are residual losses compensated for through biodiversity offsetting, whereby the loss of biodiversity is compensated for via new habitat creation off-site or by paying a financial sum to an offset provider. BNGA reports should adhere to the BNG good practice principles¹ (Baker et al, 2019)

1.3.3 BNGAs account for biodiversity losses, which previously could not be fully assessed nor mitigated for, via legal and planning systems. Whilst some species are extensively protected, many and most habitat types are not; with the consequence that

¹ [Biodiversity net gain. Good practice principles for development. A practical guide \(cieem.net\)](https://www.cieem.net/)

development can be 'legally compliant' but still result in biodiversity loss. BNGA guards against this, enabling development to contribute towards the national and global target of halting biodiversity loss (DEFRA, 2011) and towards local and national strategies for conserving and enhancing wildlife. BNGAs allow stakeholders to demonstrate adherence to national legislation and local policy concerning biodiversity.

1.4 Relevant Legislation and Policy

1.4.1 This BNGA has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:

- UK Government's 25 Year Environment Plan (Defra, 2018);
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (Defra, 2011);
- National Planning Policy Framework (NPPF) (DLUHC, 2023);
- The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006);
- The Environment Act (Defra, 2021); and,
- Folkestone and Hythe District Council Core Strategy Review 2022 (Folkestone and Hythe District Council, 2022)
- Folkestone and Hythe District Council Places and Policies Local Plan 2020 (Folkestone and Hythe District Council, 2020)

1.4.2 All species of bats are fully protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Under this legislation it is illegal to:

- Intentionally or deliberately kill, injure or capture a bat;
- Intentionally or recklessly disturb a bat when it is occupying a roost; and
- Intentionally or deliberately damage, destroy or obstruct access to a bat roost.

1.4.3 A bat roost is defined as being 'any structure or place that is used for shelter or protection', and since bats regularly move roost site throughout the year, a roost retains such designation whether or not bats are present at the time.

1.4.4 It is illegal to carry out work affecting bats or their roosts. Licences to permit illegal activities relating to bats and their roost sites can be issued for specific purposes and by specific licensing authorities in each country.

2 METHODOLOGY

2.1 Surveyor Information

2.1.1 This BNGA and PRA has been completed by Richard Laws, principal ecologist of Evergreen Ecology Ltd, who has over 12 years' experience and is a full member of CIEEM. Richard has undertaken formal training on UK Habs Classification and its use within BNG assessment with experience of implementing on numerous projects.

2.2 Bat Roost Potential Assessment

2.2.1 All survey methodologies and assessments followed the Bat Workers' Manual (Joint Nature Conservation Committee, 2004) and Bat Surveys for Professional Ecologists - Good Practice Guidelines, 4th edition (Collins, 2023).

2.2.2 An internal and external inspection of the building was undertaken to determine its bat roost potential status. Equipment used included binoculars and a high-powered torch to check for visual signs of bats and features potentially suitable for roosting bats. Where accessible the exterior walls and attic of the building were searched for evidence of roosting bat activity including droppings, rub or scratch marks, feeding remains, staining at potential roosts and exit holes, live or dead bats, and features, such as gaps, missing bricks, lifted tiles and openings surrounding the roof top.

2.2.3 Based on the location, age, type of building, features and evidence recorded, habitat and lighting present, the building was given a rating from negligible to high roost potential as described in the Bat Conservation Trust (BCT) guidelines (Collins et al 2023). The bat roost potential of the building is then used to determine the requirement for any further surveys in the form of dusk emergence to confirm presence/absence of roosting bats.

2.3 Biodiversity Net Gain (BNG) Assessment

2.3.1 The Site was surveyed using UK Habitats Classification on the 29th September 2025 to ascertain biodiversity baseline and be in line with DEFRA statutory metric calculator ; following the industry recognised best practice methodology within the Statutory Biodiversity Metric User Guide (Natural England, 2024) (SBM).

Biodiversity Metric Inputs for Baseline

Habitat Type and Area

2.3.2 The SBM uses habitat features as a proxy measure for the value and importance of nature. The following information on each habitat are the required metric inputs:

- Type;
- Area;
- Condition; and,
- Strategic significance.

2.3.3 The SBM uses a classification system based mainly on the UKHab System (UKHab Ltd., 2023), with input from other systems including the Water Framework Directive (WFD) Lakes Typology (UKTAG, 2003), the European Nature Information System (EUNIS) habitat definitions (European Environment Agency, 2022), Habitats Directive Annex 1 definitions (JNCC, 2019) and habitats specific to the SBM defined in the 'User Guide' (Natural England, 2024) and/or 'Technical Annex 2' (Natural England, 2023).

2.3.4 Habitat measurements have been calculated using the SBM, digital mapping software QGIS and development details from the chartered surveyors.

Habitat Condition

2.3.5 The condition of a habitat is a measure of the biological 'working-order' of a habitat type judged against the perceived ecological optimum state for that particular habitat.

2.3.6 Following the UKHab ecological walkover survey at the Site, the condition of each habitat type was assessed and categorised as either Good, Moderate or Poor. The assessment was made using the UKHab survey descriptions and criteria within the SBM 'Technical Supplement' (Natural England, 2024), with specific assessment criteria for each broad habitat type.

2.3.7 If a habitat type varied in condition within the Site this was recorded and mapped.

Habitat Strategic Significance

2.3.8 The SBM accounts for whether habitat is situated in an area identified as locally significant for nature. Data on areas and habitats identified as locally significant for nature were obtained from the following:

- Multi-Agency Geographical Information for the Countryside (MAGIC) website for statutory designated sites for nature conservation; and,
- Habitats listed within the Biodiversity Action Plan for Folkestone and Hythe

Biodiversity Metric Calculations

2.3.9 Biodiversity metric calculations provide a numerical score for the current value in Habitat Units (HU), Hedgerow Units (HeU) and Watercourse Units (WU), of the habitats at the Site (where applicable) in order for the baseline to be quantitatively

valued for biodiversity. This will allow for post enhancement or habitat creation works to be effectively measured for gains in biodiversity.

2.3.10 Using the SBM tool, habitat values are calculated based on their abundance, area (ha) or length (km) for linear features such as hedgerows, condition, and importance within the local area, usually identified from local relevant planning policies or documents. This gives individual baseline HU, HeU and WU for area habitats, linear habitats and aquatic habitats respectively. Units for each type are treated separately.

Trading Rules

2.3.11 The SBM considers distinctiveness as described earlier and using this data, SBM applies trading rules that require that any habitat loss is replaced on a ‘like for like’ or ‘like for better’ basis. The trading rules are detailed below in Table 1.

Table 1. Trading Rules within SBM

Distinctiveness Group	Trading Rules
Very High	Bespoke compensation likely to be required
High	Same habitat required
Medium	Same broad habitat or a higher distinctiveness habitat required
Low	Same distinctiveness or better habitat required
Very Low	Compensation not required

2.4 Assumptions and Limitations

2.4.1 Ecological surveys are limited by factors that affect the presence of plants and animals such as time of year, weather, migration patterns and behaviour. The survey was undertaken by Evergreen Ecology Ltd in September 2025 and therefore represents a valid sample of ecological evidence present on that date/season. The report is not designed, nor is it required to present a complete inventory of flora/fauna.

- 2.4.2 The condition of post-development habitats has been estimated based on the criteria within the SBM 'Technical Annex 1 - Condition Assessment Sheets and Methodology' (Natural England, 2024) and based on reasonable assumptions for the habitat types taking into account feasibility, the locality and their extent within the Site.
- 2.4.3 Strategic significance has been considered as 'Area/compensation not in local strategy/ no local strategy' for all area-based habitats. These habitats have not been identified as being of local ecological significance following a review of desk study information.

3 RESULTS AND EVALUATION

3.1 Potential Roost Assessment

3.1.1 The bat roost potential assessment was carried out on the 29th September 2025 which identified the building to be of negligible potential to support roosting bats. Site photos are provided as an appendix.

External

3.1.2 The building seems to be 1970/1980's in construction, it's a brick built bungalow with the ground floor being predominantly rendered. The roof is a mix of a small pitched section with the majority being a flat roof behind at the rear likely from a past extension. The pitched roof supports overlapping slate tiles which are in good condition with no visible gaps, cracks or lifted tiles present. Ridge tiles are all in tact with no visible signs of wear which could create suitable Potential Roost Features (PRFs). Plastic soffit boxes surround the eaves are in good condition with no visible gaps or holes. The front and rear gable ends on the second floor are clad with tiles which are generally in good condition, some small gaps are present where lifted but these do not ingress significantly to provide a PRF. At the front there is an inset wooden beam where there may be some gaps and holes but they do not appear to ingress into the building, they are exposed to the elements and likely illuminated by the street lighting. The brickwork and mortar is in good condition with no gaps identified. Overall the building is in good condition and is well kept with no PRFs identified. No field signs of bats were recorded on the outside of the property or in the vicinity.

Internal

3.1.3 Internally the small attic space is open to the apex with wooden beams and bitumen lined. The attic is well sealed with no light spill identified from any gaps which would allow bats access. The attic space is insulated, partially boarded out and used for storage. No PRFs identified which would be accessible to bats and no field signs of presence found.

Surrounding habitat

3.1.4 The building is located along a residential road near to the coast and backs onto open countryside which is primarily arable land. Whilst the linked gardens offer some foraging and commuting habitat its considered limiting overall with the lack of

hedgerows and woodland in the surrounding area. The bat assemblage and population is likely to be limited in the locality for this reason.

Roost potential

3.1.5 The building has been assessed as having negligible potential to support roosting bats. This is primarily due to the lack of PRFs to support roosting bats given the age and well maintained nature of the building. Although there is connectivity to bat foraging habitat in the wider landscape; its location provides limited local foraging resource to support roosting bats.

3.2 Biodiversity

Baseline Biodiversity

3.2.1 The Site has been assessed for its biodiversity using the DEFRA statutory metric calculator, as provided in Appendix 4. The baseline results of the assessment identified the site habitats had a total HU of 0.08, the results have been summarised in Table 2 below.

Area Habitats

3.2.2 Baseline habitats on the Site comprised Urban – developed land, sealed surface (u1b), Grassland – vegetated garden (u~828) and Grassland -Scattered trees (g~32). The habitats are described using the UKHab methodology which match with SBM terminology. None of the habitats present within the Site condition assessment.

Table 2. The Site Baseline Habitat Areas and Biodiversity

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
Urban - Developed land; sealed surface	V.Low	N/A - Other	0.02071	0.00
Urban - Vegetated garden	Low	Condition Assessment N/A	0.04093	0.08
Total Habitat Area			0.06164	

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
Total Habitat Units (HU)				0.08

Post-Development Biodiversity

3.2.3 The following details the completed biodiversity metric calculations based on the baseline values against the current site layout proposals and proposed site plan (See Appendix 2).

Current Landscaping Proposals

3.2.4 Post-development habitat includes retained vegetated garden and creation of developed land, sealed surface, as described within SBM. The proposed development involves a small loss of vegetated garden. Post-development habitats including lawn and planting areas are considered to be vegetated garden as shown in Appendix 2.

3.2.5 The habitat type, distinctiveness, condition, area and HU of the post-development area habitats are provided within Table 3. Post-development, through habitat retention of the area-based habitats will deliver 0.07 HU based on the current proposals as shown in Appendix 2.

Table 3. The Site Post-development Area Habitats, Condition and Habitat Units

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
Retained				
Urban - Vegetated garden	Low	Condition Assessment N/A	0.03379	0.07
Created				
Urban – developed land, sealed surface	V.Low	N/A - Other	0.02785	0.00

Total Habitat Area (ha)	0.6164	
Total Habitat Units (HU)		0.07

3.2.6 A summary of the biodiversity calculations detailed above are provided in Table 4 below.

Table 4. Summary of Biodiversity Net Gain Calculations On-site

Habitat Type	Baseline Units	Post-development Units	Change in Units	Total Net % Change	Trading Rules Satisfied
Habitat Units (HU)	0.08	0.07	-0.01	-17.44%	No

4 DISCUSSION AND RECOMMENDATIONS

4.1 Legislation and Local Policy

4.1.1 The requirement for the delivery of 10% net gain in biodiversity under Environment Act 2021 for small sites became mandatory from the 2nd April 2024.

4.1.2 Folkestone & Hythe District Council Core Strategy Review 2022 states:

'Policy CSD4

Green Infrastructure of Natural Networks, Open Spaces and Recreation

1. The council will require development proposals over their lifetime: i. To provide net gains in biodiversity at least to comply with statutory and/or national policy requirements (assuming no residual loss);'

4.2 BNG Principles

4.2.1 The BNG good practice principles (CIEEM, CIRIA, IEMA, 2016) are taken into account during the BNG assessment and throughout the progression of the design of the proposed development at this Site.

4.3 Net Unit and Percentage Change On-Site with Recommendations

Area Habitats

4.3.1 The Site has a baseline of 0.08 HU and post development will retain 0.07 HU. The calculated net unit change of -0.01 HU and net percentage change of -17.44% for area habitats means that the current proposals, taking into account the predicted post-development habitats, will not achieve a quantitative measurable no net loss in HU. Delivery of 0.02 HU would be required to achieve 10% BNG on-site.

4.3.2 The SBM trading rules have not been satisfied for area habitats. This is based on loss of the low distinctiveness habitat vegetated garden, as the proposed post-development habitats do not provide sufficient HU to compensate for the overall loss. To compensate for losses of low distinctiveness habitat, delivery of HU of the same broad habitat type (i.e. vegetated garden) or higher distinctiveness habitats (i.e. individual urban trees) would be required. Due to the land around the property being privately owned it is not possible to mitigate onsite for the BNG loss through enhancement or inclusion of higher distinctiveness habitats.

4.4 Biodiversity Enhancements

4.4.1 The proposed development includes for features which will benefit biodiversity which are not recognised within the SBM with a quantitative figure but should be considered qualitatively as mitigation for the loss of biodiversity. These include:

- Bat and Bird boxes
- Bee/bug hotel
- Utilisation of native plant species of local provenance
- Fruiting/flowering tree species to provide a nectar source to pollinating insects

4.5 Off-Site Compensation

4.5.1 As the required quantifiable measurable net gain i.e. 10%, cannot be achieved on Site in its entirety, off-site compensation to deliver the residual HU will be secured in the event the biodiversity enhancements are not considered sufficient from a qualitative perspective.

4.5.2 The options to achieve a quantifiable net gain in HU through off-site compensation are as follows (in order of preference in accordance with the mitigation hierarchy):

- Delivery of the required HU off-site but on land under the same ownership where long-term management can be secured. An ecological walkover survey of any identified areas would be required to record the baseline habitat types and conditions present at the off-site land. Metric calculations would then be run using SBM taking into account predicted post-intervention habitat types to identify the number of HU delivered and determine a total net unit and percentage change for the proposed development.
- Delivery of the required HU through a financial payment to a third party organisation such as a Habitat Bank or the Local Planning Authority. Such organisations may have habitat banks in the local or wider area whereby a financial contribution would deliver the required HU taking into account the trading rules and support delivery of long-term local nature conservation actions in the local or wider area.

4.6 Other Considerations

4.6.1 The gardens supports shrubs and ornamental planting that has the potential to support nesting birds, common amphibians and hedgehog. The vegetation clearance works has the potential to cause disturbance to these species. In the event works to

existing habitats is required during the breeding bird season (March to September) then a nesting bird check should be undertaken by an Suitably Qualified Ecologist (SQE) a maximum of 48 hours prior to works commencing in order to adhere to all relevant legislation. In the event of an active nest being identified then a suitable no works buffer (5m) will be implemented until chicks have fledged and the nest is no longer in use. Any suitable hibernation habitat for hedgehog should be avoided in the winter months.

- 4.6.2 The ornamental planting in the rear of the garden supports stands of Japanese rose *Rosa rugosa* which is a Wildlife and Countryside Act 1981(as amended) Schedule 9 Invasive species. It is an offense to cause its spread within the wild and should therefore be removed from the Site during the works. Its control and eradication should involve its disposal through the use of a licensed landfill that can accept contaminated material and subsequent onsite treatment to prevent any re-growth.




5 CONCLUSION

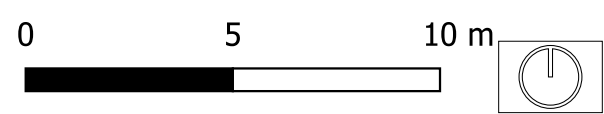
- 5.1.1 The proposed development has shown that there is a minor loss of biodiversity onsite. Mitigation options have been reviewed to compensate and provide the 10% BNG required. In order of preference the proposed development has tried to implement the mitigation requirements onsite and provide qualitative biodiversity enhancements however due to the private ownership and plot size it is not feasible to provide the quantifiable 10% net gain. Where current proposals are not considered adequate It is likely the landowner will utilise off-site compensation to mitigate the minor BNG loss through the use of a Habitat Bank. Its considered that the project can meet both national and local planning policy, and legislation in regards to biodiversity.
- 5.1.2 Measures to be implemented to prevent impacting on nesting birds, common amphibians and hedgehog have been provided during the vegetation clearance works. Control and eradication of Schedule 9 invasive species will also be required to prevent the spread in the wild.

APPENDIX 1 – UK Habitat Classification Plan



LEGEND

-  Red Line Boundary
-  Developed land; sealed surface
-  Vegetated garden



GRID REFERENCE:
N/A

ADDRESS:
85 DUNES ROAD, GREATSTONE, NEW ROMNEY, KENT

POST CODE:
TN28 8SW

CLIENT:
CHOICE SUPPORT

85 DUNES ROAD

Drawing title:
UK HABITAT
CLASSIFICATION PLAN- BASELINE

Drawing No. :
001

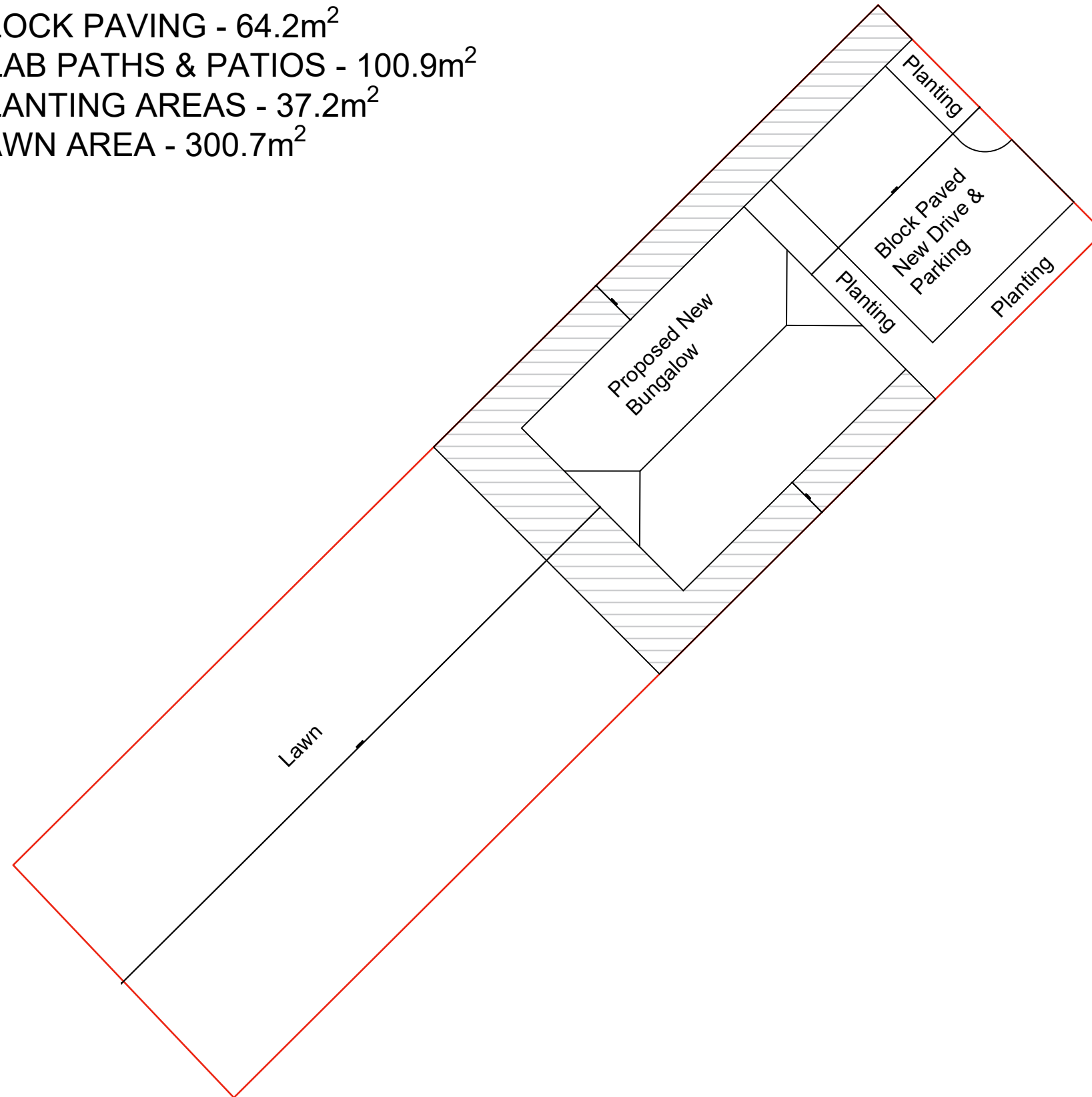
Drawn by: RL	Date: November 2025
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APPENDIX 2 – Post Intervention Plan

NOTES:-

PROPOSED AREAS:-

- 1) PROPOSED BUNGALOW - 113.4m²
- 2) BLOCK PAVING - 64.2m²
- 3) SLAB PATHS & PATIOS - 100.9m²
- 4) PLANTING AREAS - 37.2m²
- 5) LAWN AREA - 300.7m²



Key

— The Site

0 1 2 4 6 8
Meters

N

SLAB PATHS & PATIO

All dimensions must be checked on site. Do not scale from this drawing.

Any discrepancies must be reported to Lawson Queay Chartered Surveyors.

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Rev	Date	Amendment	CDM CHK
A	02/07/2025	Orientation to represent North and dimensions added	
B	02/11/2025	Slab paths and Patio and Planting	



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BUILDING SURVEYORS -
CONSTRUCTION & COST CONSULTANTS -
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Client
Choice Support

Project
85 Dunes Road

Drawing Title
Proposed Site Plan

Scale 1:200 @ A3 Date 16/06/2025
Drawn By [Signature] Drg Review

Drawing No. 254890/02-05 Revision B

Appendix 3 – Site Photos



















APPENDIX 4 IS PROVIDED SEPARATELY