



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher

FROM: Helen Forster

DATE: 13 August 2024

SUBJECT: The Kings Veg, Gravesend 20240606+20240610

The following is provided by Kent County Council's Ecological Advice Service (KCC EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the county council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application and if sufficient/appropriate ecological information has been provided.

Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the planning officer, who will seek input from the EAS where appropriate and necessary.

No ecological information has been submitted with this application. As a result of reviewing the data we have available to us, and the information submitted with the planning application, we advise that further information is sought from the applicant with regards to the potential for ecological impacts to arise.

We have taken this view as the pictures provided within the planning statement for application 20240606 indicate that the building is in poor condition and not used regularly. The proposal is for the conversion of office space to residential but as the building has not been used regularly it is possible that bats may be roosting within parts of the building. In addition the satellite photos do highlight that the external part of the building has potential to support roosting bats.

If bats are present within the building the erection of the building for application 20240610 could impact flight patterns and how the bats access the building. Therefore we highlight that the bat survey is required for both buildings.

As such, an Ecological Impact Assessment (EcIA) should be undertaken by a suitably qualified ecologist¹, in accordance with good practice guidelines.

The EcIA will include the following:

- Details of the impacts of development proposals on the ecological baseline established via a Preliminary Roost Assessment any required bat emergence surveys.
- Details of any necessary and achievable ecological mitigation and/or compensation measures;
- Details of ecological enhancement measures, and;
- Provision of sufficient information to determine whether the project accords with relevant nature conservation policies and legislation.

To ensure that the planning determination is adequately informed in respect of all potential ecological impacts, we advise that the EcIA is sought prior to determination of the planning application. This is in alignment with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005² which states *“it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”*.

We highlight that the request for a EcIA does not need to be onerous. It should be fairly simple for the applicant to commission a bat roost assessment. We highlight that if bat surveys are required it is right at the end of the survey season.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Location Plan, Existing Block Plan, Proposed Block Plan; Dream Design Develop; July 2024

¹ Suitably qualified ecologists can be found using either the: [CIEEM Registered Practice Directory](#) or the [Environmental Data Services Directory](#).

² [odpm-circ-0605.qxd \(publishing.service.gov.uk\)](#)