



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher
FROM: Nancy Inman
DATE: 20 May 2025
SUBJECT: Land N & S of Station Road, Southfleet 20250013

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.

SUMMARY: FURTHER INFORMATION REQUIRED

We have reviewed the submitted ecological information and advise that additional information is required prior to determination. A breeding bird survey report and bat activity survey report have been produced, and we are satisfied that these give a sufficient representation of bird populations and bat activity onsite, however we request that an Ecological Impact Assessment is produced with consideration of additional species that may utilise habitats onsite. There is a pond onsite, and several ponds within 500m of the site which may be suitable for great crested newt (GCN), and the structural diversity of grassland swards appears to provide suitability for reptile species, multiple records of GCN and reptiles are present within 1km of the site. Hedgerows and woodland parcels are present which may provide suitable habitat for dormice and badger. Additionally, consideration should be given to the potential impacts of development proposals on wintering bird populations given the sites proximity to the coast.

A Biodiversity Net Gain (BNG) assessment has been submitted with this application which has included the use of offsite land to provide biodiversity enhancements and achieve a net gain of +13% area units and +29.07% hedgerow units. We are unable to see that a biodiversity metric has been submitted with this application and therefore cannot comment further on BNG until this has been received.

Ecological Impact Assessment Required

As a result of reviewing the data 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.

Habitats and features (including other hedgerows, woodland ponds, other neutral grassland and mixed scrub) are present on and around the site, indicating ecological value and the potential for protected species presence that must be taken account of in the planning decision. Additional land in the wider landscape is proposed for enhancement or change of habitat (e.g. cropland to grassland), and impacts to protected species as a result of this will need to be considered within the EcIA, with these areas incorporated into surveys where appropriate.

An Ecological Impact Assessment (EcIA) should be undertaken by a suitably qualified ecologist.

The EcIA will include the following:

- Details of the impacts of development proposals on the ecological baseline established via a Preliminary Ecological Appraisal (PEA) and any necessary additional surveys undertaken;
- 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 accordance with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005 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”*.

Under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 through 195 of the NPPF 2024, biodiversity should be maintained and enhanced through the planning system.

BREEDING BIRD SURVEYS

A total of three breeding bird surveys were undertaken, which is below the industry standard of six surveys¹, however we are satisfied that the site was largely unsuitable for

¹ Bird Survey & Assessment Steering Group, 'Bird Survey Guidelines', 2024.

ground nesting species, with the areas of highest value (treelines/hedgerows/woodland) being largely retained and that the assessment of 'Local level' importance is likely accurate.

BAT SURVEYS

The results of static and night-time bat walkover surveys concluded that the site is of County Level importance for foraging bats. Though activity from rare species (e.g. barbastelle) was infrequent, the high levels of activity from more common species and the potential presence of a functionally linked common pipistrelle and serotine maternity roost to the south increased the value of the site for foraging bats. The bat report (RSK Biocensus, Dec 24) indicates that lighting levels will be low during the operational phase of the development, however this will need to be confirmed through the production of a sensitive lighting strategy post-determination.

BIODIVERSITY NET GAIN – FURTHER INFORMATION REQUIRED

We are unable to comment on the BNG report (Clearstone Energy and RSK Biocensus Dec 24), as no metric has been made available to us.

Any application which is required to achieve a 10% BNG must submit the following information with the planning application as a minimum²:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), [either on the date of application or earlier proposed date \(as appropriate\)](#);
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- **[the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;**
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ([‘degradation’](#)), and where they have:
 - a statement to the effect that these activities have been carried out;
 - the date immediately before these activities were carried out;
 - the pre-development biodiversity value of the onsite habitat on this date;
 - the completed metric calculation tool showing the calculations, and
 - any available supporting evidence of this;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#))

² <https://www.gov.uk/guidance/biodiversity-net-gain#para11>

on the land to which the application relates, that exists on the date of application, (or an earlier date); and

- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Nancy Inman
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Indicative Layout Plan – CADmando Dec 23
- Proposed Ecology Plan – CADmando July 24
- Landscape Strategy – Liz Lake Associates Dec 24
- Existing Site Layout Plan – CADmando Dec 23
- Planning Design and Access Statement – Clearstone Energy Dec 24
- Biodiversity Net Gain Report - Clearstone Energy and RSK Biocensus Dec 24
- Breeding Bird Survey Report (RSK Biocensus, Dec 24)
- Bat Activity Survey Report (RSK Biocensus, Dec 24)