



ECOLOGICAL ADVICE SERVICE

TO: *Ethan Bonthron*

FROM: *Helen Forster*

DATE: *25 February 2025*

SUBJECT: *Land At RO Flint Cottage, Northfleet; 20241160*

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.

We advise that insufficient information has been provided to determine the planning application with regard to reptiles and the BNG assessment.

Protected/Notable Species

The submitted ecological reports has detailed that there are at least four species of bats are foraging/commuting within the site and there is suitable habitat for breeding birds, reptiles, badgers and hedgehogs. No bats were recorded roosting within the buildings.

We advise that we have concerns with the conclusion that there is no requirement for a reptile survey to be carried out. The photos provided by the planning officer and from reviewing satellite photos it appears there is suitable habitat within the site and it has not clearly demonstrate where reptiles will be relocated to if found during the precautionary mitigation.

Therefore we advise that additional information is provided clarifying why a reptile survey is not required as part of this application.

Biodiversity Net Gain

Under the Environment Act 2021, all planning applications for major development (unless exempt^{1,2}) submitted on or after 12th February 2024 in England, will have to deliver at least a 10% biodiversity net gain. It is a requirement for minor applications, unless exempt, submitted on or after the 2nd April 2024.

Having reviewed submitted information, we consider this application to fall under mandatory biodiversity net gain so that mandatory biodiversity net gain of 10% will apply.

Any application which is required to achieve a 10% BNG must submit the following information as a minimum³:

- 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](#)) 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).

We advise that insufficient information has been provided with regard to mandated BNG. The report has detailed that the only habitat on site are tall ruderals but a review of the photos within the metric suggest that grassland and scrub are present within the stie.

¹ [Biodiversity net gain: exempt developments - GOV.UK \(www.gov.uk\)](#)

² [The Biodiversity Gain Requirements \(Exemptions\) Regulations 2024 \(legislation.gov.uk\)](#)

³ <https://www.gov.uk/guidance/biodiversity-net-gain#para11>

We advise that an updated metric and a habitat plan of the site including all habitats within the site. The metric has detailed that currently the proposal will result in a loss of 51% BNG and the information details that the proposal will result in a deficit of less than 1 unit due to the loss of tall ruderals within the site. However as we are of the opinion that the habitats have been unrecorded within the site it is likely that the deficit will increase.

Ecological Enhancements

Under section 40 of the NERC Act 2006 and paragraphs 187 and 193 of the NPPF 2024 biodiversity should be maintained and enhanced through the planning system. In addition to BNG we advise that ecological enhancement features must also be incorporated in to the site. We recommend that an ecological enhancement plan is submitted.

Lighting

Four species of bats have been recorded within the site and lighting can have a negative impact on bats (and other nocturnal species) and therefore any lighting must be designed to minimise light spill.

We are satisfied that details of the lighting can be submitted via a condition. We can provide suggested wording once the additional information has been provided.

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:

- Bat Survey; KB Ecology; August 2024
- Biodiversity Gain Statement V1.2
- Small Sites Metric
- Preliminary Ecological Appraisal; KB Ecology; May 2024