



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher

FROM: Helen Forster

DATE: 13 December 2024

SUBJECT: 32 Milton Road, Gravesend 20241008

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 provided pre application on application PRE20240161 and our advice has not changed. No ecological information has been submitted with this application submission. As a result of reviewing the data we have available to us, and the information submitted with the planning application, we advise that the proposal has limited potential to result in significant ecological impacts.

We have taken this view as the images on google earth suggest that the building does not appear to provide optimal features to support roosting bats (e.g. no tiled roof or weather boarding). In addition we understand that other than repairs the majority of the works will be internal to convert the building to flats. An extension is proposed for the site but from the information available to us it does not appear that suitable bat roosting features will be lost. As such, we are satisfied that there is no requirement for an ecological survey to be carried out at this time¹.

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024,

¹ We consider we have taken a proportionate approach to ensure that the provision of information within the planning application is appropriate to the environmental risk associated with the development and its location in line with Clause 4.1.2 of BS42020 (BSI, 2013).

biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for avoidance, mitigation and compensation. We advise that details of how the site will enhance biodiversity must be submitted with the planning application.

Designated Sites

The development includes proposals for new dwellings/holiday accommodation within the zone of influence (ZOI) (6km) of the Thames Estuary and Marshes Special Protection Area and it's associated Wetland(s) of International Importance under the Ramsar Convention (Ramsar Site).

Gravesham BC must consider the impact any submitted application will have on these designated sites in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the National Planning Policy Framework (NPPF) 2024.

Gravesham BC will need to ensure that any application fully adhere to the agreed approach within the North Kent Strategic Access Management and Monitoring Strategy (SAMMS). This is to mitigate for additional recreational impacts on the designated sites and to ensure that adequate means are in place to secure the mitigation before first occupation.

A decision from the Court of Justice of the European Union has detailed that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a full Appropriate Assessment is needed under the Habitats Directive. Therefore, we advise that due to the need for the application to contribute to the North Kent SAMMS, there is still a need for an appropriate assessment to be carried out as part of this application.

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

Insert Name
Biodiversity Officer