



ECOLOGICAL ADVICE SERVICE

TO: Richard Hart

FROM: Helen Forster

DATE: 13 April 2022

SUBJECT: Land At 270-340 Valley Drive, Gravesend 20220305

The following is provided by Kent County Council's Ecological Advice Service (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 whether sufficient and appropriate ecological information has been provided to assist in its determination.

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.

Condition 15 states: Prior to the first occupation of the development hereby approved a scheme for providing bat roosting opportunities at the site, in line with the recommendations of the Bat Survey Report (Greengage, September 2017) has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full prior to the first occupation of the residential units hereby permitted.

The preliminary ecological appraisal submitted with this application has advised that the buildings had low potential to be used by roosting bats and stated that bat emergence surveys were required. As a result of reviewing the satellite photos we understand that the buildings have already been demolished and therefore if bats were roosting within the buildings, we advise that (without mitigation) the works would have resulted in a breach of wildlife legislation.

We question if the recommended bat emergence surveys were carried out and in that situation we require the results of the surveys to be submitted as part of this condition discharge.

5 integrated bat boxes are proposed to be erected on northern and western aspects of the buildings. Typically bats prefer boxes to be located on the southern and eastern aspects of the

building and therefore we require confirmation of why the bat boxes have been proposed to be located within northern and western aspect. The bat boxes may have been located on those aspects due to the results of bat emergence surveys but if this is not the case, we recommend that the integrated features are located within the courtyard area. As the planting of the communal gardens, if native species incorporated in to the planting plan, is likely to be beneficial to foraging bats.

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:
Preliminary Ecological Appraisal; Greenlink Ecology; November 2018
Integrated Bat Box Plan