



ECOLOGICAL ADVICE SERVICE

TO: Peter Price

FROM: Luke Wallace

DATE: 23 February 2022

SUBJECT: 20211092 / Milton Mount Hall, Gravesend

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.

We have reviewed the ecological information submitted by the applicant and advise that sufficient ecological information has been provided.

Roosting Bats

The roost assessment states that bats are unlikely to roost within the building (that is to be demolished) but does recommend a precautionary approach is taken. This primarily consists of hand removal of potential roost features/roof material under supervision of a licenced ecologist.

We concur and to ensure this is enacted, we advise that a condition is attached to any granted planning permission. Suggested wording:

From the commencement of works (including site clearance), all precautionary mitigation measures for bats will be implemented in accordance with the details contained in the 'recommendations' section of the Preliminary Roost Appraisal (EcoAssistance November 2021).

Breeding Bird Informative

Habitats are present on and around the site that provide opportunities for breeding birds. Any work to vegetation/structures that may provide suitable nesting habitats should be carried out outside of the bird breeding season (March to August) to avoid destroying or damaging

bird nests in use or being built. If vegetation/structures need to be removed during the breeding season, mitigation measures need to be implemented during construction. This includes examination by an experienced ecologist prior to starting work and if any nesting birds are found, development must cease until after the juveniles have fledged. We suggest the following informative is included with any planning consent:

The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this Act. Breeding bird habitat is present on the application site and assumed to contain nesting birds between 1st March and 31st August, unless a recent survey has been undertaken by a competent ecologist and has shown that nesting birds are not present.

Biodiversity and Ecological Enhancement

Under section 40 of the NERC Act (2006), and paragraph 174 of the NPPF (2021), biodiversity must be maintained and enhanced through the planning system. Additionally, in alignment with paragraph 180 of the NPPF 2021, the implementation of enhancements for biodiversity should be encouraged.

It is difficult to understand how the development is going to achieve a biodiversity net-gain so we advise that every available option is utilised to maximise the gains. Ideally, this includes:

- Green roofs/walls.
- A native species-only landscape plan.
- Wildflower meadow creation/management.
- Sensitive lighting.
- Integrated bird nest bricks.

To secure the implementation of biodiversity loss offsetting/ecological enhancements, we advise that a condition is attached to any granted planning permission. Suggested wording:

Within six months of works commencing, details of how the development will offset biodiversity loss/enhance biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include a native species-only landscape plan and integrated bird nest bricks. The approved details will be implemented and thereafter retained.

Luke Wallace
Biodiversity Officer

This response was submitted following consideration of the following documents:
Preliminary Roost Appraisal. EcoAssistance. November 2021.