



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher

FROM: Philippa Bromley

DATE: 23 June 2026

SUBJECT: 20260243: The Woodlands, 217 Wrotham Road

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: ADDITIONAL INFORMATION REQUIRED

We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. The following information is required prior to determination:

- Preliminary Roost Assessment
- Clarification of on site area

This application is for the conversion of an existing building into a McDonald's drive-through restaurant, including alterations to elevations, demolition and replacement of the side extension, and the provision of car parking and a paved walkway. No ecology was submitted with this application.

BATS

The proposal involves demolition and alterations to the existing structure, which may contain potential roost features (PRFs) that could support roosting bats. Due to its structural complexity, the building includes numerous features such as multiple roof junctions, chimney stacks, eaves and soffits, that could provide gaps and crevices suitable for roosting bats. Additionally, mature trees are also present on-site. Records from the Kent and Medway Records Centre indicate the presence of foraging bats and a Natterer's

bat roost has previously been identified within the surrounding area. Therefore, the proposed demolition works could negatively affect bats, and a Preliminary Roost Assessment (PRA) is requested.

If the PRA identifies roosting bat suitability to be present and impacted by the development, it is likely that further surveys for bats will need to be carried out. The results of the necessary surveys carried out, and details of any mitigation required should be submitted prior to determination of the planning application. This is in alignment with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005¹, 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”*.

Should bats be found to be roosting in the building(s) proposed for alteration/demolition, a mitigation licence may be required from Natural England for works to proceed.

Artificial Lighting

Lighting in the vicinity of a bat roost or along commuting/foraging routes could result in disturbance resulting in roost abandonment, which is an offence under Regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended). Artificial lighting has been shown to be particularly harmful to bats along river corridors, near woodland edges and near hedgerows. Local authorities have a duty to ensure impacts upon legally protected species are avoided and impacts upon bats are a material consideration in any planning permission under the Natural Environment and Rural Communities (NERC) Act 2006 and through the National Planning Policy Framework (NPPF) 2024.

Therefore, to mitigate against potential adverse effects on biodiversity, the Bat Conservation Trust/Institute of Lighting Professionals ‘*Guidance Note 08/23 Bats and Artificial Lighting at Night*’ should be consulted in the lighting design of the development. We advise that the incorporation of sensitive lighting design for biodiversity is submitted to the local planning authority and secured via an attached condition with any planning permission. We can provide suggested wording once the additional information has been provided.

OTHER PROTECTED SPECIES

We are satisfied that impacts on other species likely to be present can be addressed via a precautionary mitigation approach. We can provide suggested wording once the additional information has been provided.

¹ odpm-circ-0605.qxd (publishing.service.gov.uk)

BIODIVERSITY NET GAIN

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications² for development (unless exempt^{3,4}), must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

Having reviewed submitted information⁵, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development. We consider there is no local policy biodiversity net gain requirement above 10% for this development.

We have produced the following table to aid the local planning authority in ascertaining whether sufficient BNG information has been submitted:

Table 1: To show whether the applicant has met the minimum validation requirements, expected information standards in line with planning practice guidance and any applicable national or local policies.

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	Y	
The pre-development biodiversity value(s), <u>either on the date of application or earlier proposed date (as appropriate).</u>	Y	A site visit was carried out by a suitably qualified ecologist 20/02/2026. This is considered acceptable to inform the habitat baseline for this application given the site size, location and habitats reported.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	NA	
<u>The completed metric calculation tool</u> 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.	N	The site is 0.4 hectares in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool is 0.17 hectares and does not match the reported red line boundary site area as per the application form. This is a discrepancy of 2,300 square metres.

² All planning applications for major development (unless exempt) submitted on or after 12th February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2nd April 2024.

³ Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

⁴ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

⁵ References to the biodiversity value of any habitat or habitat enhancement within this section of the advice note refer to the value as calculated in accordance with the biodiversity metric.

		Based on indicative measurements from Google Earth, the site area of 0.17 hectares used in the BNG metric is considered to more accurately reflect the site size. However, we require further clarification on the site size. The habitat baseline must be accurate prior to determination and must reflect the entire red line boundary only. <u>Baseline Habitats</u> Subject to the area of habitats within the site not increasing, we are content with the baseline habitat classifications. We highlight to Gravesham Borough Council that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28th November 2025. The LNRS changes how strategic significance is considered and any BNG assessments produced after the LNRS was published can no longer use <i>Location ecologically desirable but not in local strategy</i>. All baseline information must be set to <i>Area/compensation not in local strategy/ no local strategy</i> The baseline information has correctly reflected the published LNRS requirements.
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 ('<u>degradation</u>'), 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.	Y	None reported or visible on aerial imagery dated 6th August 2025 (Google Earth, accessed 22/6/26 date)
A description of any <u>irreplaceable habitat</u> (as set out in <u>column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024</u>) on the land to which the application relates, that exists on the date of application, (or an earlier date).	-	None reported.
Plan(s), drawn to an identified scale and	Y	The red line boundary in the Location

showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).		Plan matches the on-site habitat plan.
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Post-development Habitats

Habitat Creation and Enhancement Tabs

Subject to the area of habitats within the site not increasing the baseline value of the site, we consider that the proposed habitat creation/enhancement and proposed uplift of 10.76% BNG is achievable and realistic.

Information has been submitted with this application to give confidence that the biodiversity gain hierarchy can be effectively applied to this application, and how conditions should be applied should planning consent be granted.

LNRS

The publication of the LNRS occurred before the planning application was submitted, and it can alter the post-development strategic significance score. However, in this instance, the site lies within an Area that Could become of Importance for Biodiversity (ACIB) with no potential measures that currently match the proposed on-site habitat creation/enhancement action. Changes to the strategic significance scores for the habitats currently proposed on-site are unlikely to make a significant difference to the achievable BNG outcomes for the site.

Submission of Biodiversity Gain Plan

The applicant should submit a biodiversity gain plan form⁶ along with supporting information (e.g., legal agreement and habitat management and monitoring plan) once planning permission has been granted to demonstrate in more detail how the proposed biodiversity net gain will be delivered. The biodiversity gain plan must include the following information:

- Information about steps taken or to be taken to minimise the adverse effects of the development on biodiversity;
- The pre-development biodiversity value of the on-site habitat;
- The post-development biodiversity value of the on-site habitat;
- Any registered off-site biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development;
- Any biodiversity credits purchased for the development; and
- Any other matters that the Secretary of State may be regulations specify.

We advise the local planning authority that there may be conditions attached to the decision notice should planning permission be granted that are linked to the biodiversity gain plan. Wording should be included in such conditions to ensure that it is clear that any

⁶ [Biodiversity gain plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/biodiversity-gain-plan)

documents/plans are produced in accordance with the 'approved biodiversity gain plan'. Relevant conditions where this is likely to be appropriate include soft and hard landscaping conditions, and any other ecology/biodiversity conditions. Other relevant conditions may include drainage conditions.

Philippa Bromley
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Existing Building Demolition Works Elevations (AEW Architects, February 2026)
- Existing Building and Roof Demolition Works Plan (AEW Architects, February 2026)
- Existing Site Demolition Works Plan (Existing Site Demolition Works Plan, February 2026)
- Existing Site Plan (AEW Architects, February 2026)
- Proposed site Plan (AEW Architects, March 2026)
- Biodiversity Net Gain Feasibility Stage Report (Practical Ecology, February 2026)
- BNG Metric (S. Curtis, February 2026)