



ECOLOGICAL ADVICE SERVICE

TO: Rebecca Harrison

FROM: Nancy Inman

DATE: 14 October 2025

SUBJECT: Scouts Hall, Gravesend 20250130

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: SUFFICIENT INFORMATION PROVIDED

The site is of overall low value for biodiversity, consisting of managed modified grassland and a building in an urban context. Habitats onsite should remain managed to avoid increased suitability for protected species such as reptiles prior to the commencement of construction. The building was deemed to have moderate bat roost potential, and as such two emergence surveys were completed, no bat emergences were recorded (Arbtech, Sept 25) and they are presumed likely absent. Two trees are present onsite, and no ground level tree assessment appears to have been undertaken in relation to roosting bats, however these appear to be immature and unsuitable for roosting bats.

The Biodiversity Net Gain assessment demonstrates a net loss of 0.18 habitat units (-70.44%), and an additional 0.20 habitat units are required to achieve a 10% net gain.

PRECAUTIONARY WORKING METHODS

Sensitive working methods will be required throughout the during of construction, as there is some potential for protected/notable species such as nesting birds, reptiles and hedgehog to be present onsite or in the surrounding habitats.

Suggested Condition Wording:

1. Any hedgerow and trees to be retained, including its roots, shall be protected from damage in line with The British Standard "Trees in Relation to Design, Demolition and Construction to Construction - Recommendations" (BS 5837) (2012);
2. Any required clearance of tall/dense vegetation with potential to support reptiles should be undertaken in two stages, with a first cut to 150mm, followed by a second cut several days later to ground level;
3. Brash, rubble and log piles to be relocated shall be dismantled by hand. Where these are suitable for hibernating reptiles/hedgehog, removal shall be conducted outside of the hibernation period (November – February);
4. Backfilling of trenches and other excavations shall be undertaken before nightfall, or a ramp shall be left to allow any animals to easily exit;
5. All excavations and trenches shall be checked each morning throughout the construction period and prior to infilling;
6. All temporarily stored building materials (that might act as temporary resting places) shall be isolated within hardstanding areas and raised off the ground, e.g. on pallets.
7. Any work to vegetation/structures that may provide suitable nesting habitats should be carried out outside of the bird breeding season (1st March to 31st August inclusive) 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. This includes examination by a suitably qualified and experienced ecologist immediately prior to starting work. If any nesting birds are found, works must cease until after the birds have finished nesting.
8. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or to contact the Bat Advice Service on 0345 1300 228, email enquiries@bats.org.uk or visit the Bat Conservation Trust website.
9. If at anytime a protected species is discovered within the works area all works must stop while a suitably qualified ecologist and/or Natural England are consulted. Works shall not resume until any required surveys and/or mitigation are completed.

ARTIFICIAL LIGHTING

Lighting in the vicinity of a bat roost or along commuting / foraging routes could constitute an offence both to a population and to individuals. Artificial lighting has been shown to be particularly harmful to bats along river corridors, near woodland edges and near hedgerows¹. 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 NPPF 2024.

Therefore, to mitigate against potential adverse effects on biodiversity, the Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 8 Bats and Artificial Lighting at Night' (or subsequent updates) should be consulted in the lighting design of the development.

¹ Bats and Artificial Lighting guidance. Available [here](#).

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.

Suggested Condition Wording:

No external lighting, whether temporary or permanent, shall be installed on the site unless details are submitted to and approved in writing by the local planning authority. Details of any proposed external lighting shall accord with the Bat Conservation Trust/Institute of Lighting Professionals 'Guidance Note 08/23: Bats and Artificial Lighting at Night' and demonstrate that no impacts to bat foraging/commuting activity will result. Such details shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) as well as an ISO lux plan showing light spill. The details shall be implemented as approved and retained thereafter.

Reason: To limit the impact of light pollution from artificial light in accordance with the NPPF 2024, paragraph 198(c). With consideration for bats and other nocturnal wildlife in accordance with the NPPF 2024, paragraph 187(d).

BIODIVERSITY NET GAIN

The Biodiversity Net Gain (BNG) assessment (Arbtech, Jan 25) demonstrates a loss of a 0.18 habitat units (-70.44%), and an additional 0.20 habitat units are required to achieve a 10% net gain. This loss comes primarily from the removal of 2 x trees and areas of poor condition modified grassland. Post-development habitats have included the creation of other neutral grassland in moderate condition. We consider that this habitat type and condition may not be achievable given the anticipated amenity use of the site, however this can be resolved post-determination. Additional opportunities such as new tree planting may want to be explored.

No post-development habitats creation is considered to be significant, given the limited unit uplift. There is therefore no requirement for 30 years of management and monitoring with LPA oversight, or a Habitat Management and Monitoring Plan (HMMP). We suggest that any habitat creation measures contributing to BNG onsite may be secured through the production and implementation of a Landscape and Ecological Management Plan (LEMP) and a Biodiversity Gain Plan.

The remaining unit deficit (at present 0.20 habitat units required to achieve 10% but may be more dependent on reconsideration of post-development grassland type/condition), will likely be offset through the obtention of offsite units or statutory credits.

If off-site habitat creation is required, we direct the applicant towards the Kent Biodiversity Net Gain Site Register^[1] available on the Making Space for Nature in Kent and Medway website. Biodiversity Net Gain Guidance for Kent is also available on this website.

Where a developer has a unit deficit smaller than 0.25 biodiversity units (area or linear) they do not need to approach 3 suppliers before considering statutory biodiversity credits. Statutory credits are intentionally marked up in price to prevent undercutting the off-site

market; these prices are reviewed every 6 months. Prices are available here: [Statutory biodiversity credit prices - GOV.UK](#). This does not require a Section 106 agreement.

BIODIVERSITY GAIN PLAN

Single Phase Development

Suggested Condition Wording:

The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the Biodiversity Net Gain Metric and Report (Arbtech, Jan 25).

Reason: To ensure the proposals are in accordance with details submitted and considered as part of the planning application, in accordance with [insert relevant policy].

The above condition is not a statutory requirement but unless imposed there would be no requirement that the Biodiversity Gain Plan submitted for approval to be in accordance with any biodiversity or ecological information submitted with the planning application. This condition may not be appropriate for some outline planning permissions where the post-development biodiversity value will not be known until reserved matters have been approved.

LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP)

Suggested Condition Wording:

Prior to any landscaping works commencing on site a landscape and ecological management plan (LEMP) shall be submitted to and approved in writing by the local planning authority. The plan shall accord with the measures outlined in the Preliminary Ecological Appraisal and Preliminary Roost Assessment Report (Arbtech, Oct 24), Bat Survey Report (Arbtech, Sept 25) and Biodiversity Net Gain Assessment (Arbtech, Jan 25) associated with the planning application and shall include details of the following:

- a) Habitat creation measures, including full details of all habitats contributing to BGN onsite*
- b) A full planting schedule utilising primarily native species;*
- c) Full elevations plans detailing the model and location of integral swift boxes in accordance with BS 42021:2022 (north/east facing, 4m from the ground and with unobstructed access);*
- d) Details of externally-mounted bat and bird boxes which are to be of durable construction and suitably located;*
- e) Locations of 13×13cm holes in closeboard fencing provided for hedgehogs*
- f) Rolling, long-term maintenance measures covering up to a 30-year period; and*
- g) Details of responsible persons.*

The approved plan shall be implemented as described and retained thereafter.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

EVIDENCE OF IMPLEMENTATION - LEMP

Suggested Condition Wording:

Within twelve months of first use of the development hereby approved, photographic evidence of the implementation of such habitat creation and biodiversity enhancement measures as are required by condition X (the LEMP condition) shall be submitted to the local planning authority for approval. The approved measures shall be thereafter retained.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

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

Nancy Inman
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Preliminary Ecological Appraisal and Preliminary Roost Assessment (Arbtech, Oct 24)
- Arboricultural Survey (Arbtech, Oct 24)
- Design and Access Statement (Dec 24)
- Biodiversity Net Gain Report and Metric (Arbtech, Jan 25)
- Bat Emergence and Re-Entry Survey (Arbtech, Sept 25)