



ECOLOGICAL ADVICE SERVICE

TO: Rebecca Harrison

FROM: Helen Forster

DATE: 25 August 2023

SUBJECT: Custom House, Gravesend 20210757

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 advise that additional information is required prior to determination.

We have reviewed the submitted ecological information and we advise that we are satisfied with the conclusions of the preliminary ecological appraisal which detail that the site has suitable habitat for roosting bats, hedgehogs and breeding birds. The preliminary ecological appraisal detailed that B1, B2, B5, B6 and B7 (numbering as per the PEA) have potential for roosting bats but bat emergence surveys have only been carried out on B2.

The planning application description details the following: *Redevelopment of the site including demolition of the southern part of the workshop building and existing corridor link at first floor level between Custom House and the outbuildings and conversion of Custom House, the coachhouse and outbuildings to include extensions, the Old Boathouse and the Boathouse with external alterations and erection of a new three storey building to provide 27 residential units.* Therefore it's our understanding that works will be carried out on all the buildings and therefore we would have expected bat surveys to be carried out on all the buildings with bat potential.

We advise that, prior to determination, bat surveys of all the buildings are required to be submitted or further information clarifying why surveys on those buildings are not required. Bats were recorded foraging/commuting within the site during the emergence survey of

building 2 and therefore the results of the previous survey cannot rule out the potential for bats roosting within the buildings.

Other Species

We advise that we are satisfied that impacts on other species can be avoided through a precautionary mitigation approach. Recommendations for condition wording will be provided following receipt of the additional information.

Landscaping and Enhancements

The landscaping plan has confirmed that native species planting will be incorporated into the site which should benefit biodiversity. In addition to native species planting we recommend that enhancement features are incorporated in to the buildings. Details of the enhancements must be provided as part of the current application.

We note that it is proposed to planting on the shingle beach and we question why there is a need for this and instead recommend that the area natural regenerates.

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; Native Ecology; February 2023
Bat Survey Report; Native Ecology; No date