



ECOLOGICAL ADVICE SERVICE

TO: Kelly Joyce
FROM: Elizabeth Fagg
DATE: 22 May 2025
SUBJECT: 20250028 Northfleet School for Girls

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: FURTHER INFORMATION REQUIRED

We have reviewed the further 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:

- Bat nighttime walkover and static surveys and any proposed mitigation measures

We are satisfied that the BNG baseline is representative. With the current proposals this site will result in a BNG net loss, and 1.02 habitat units will be required.

Protected Species and Habitats

Habitat is present that could provide suitable opportunities for protected species. The sports field is predominated modified grassland with dense scrub and some hardstanding, and it is located adjacent to woodland.

The Preliminary ecological appraisal (PEA) states that no trees will be lost to the development, and an arboricultural impact assessment has been provided that details root protection areas. Foraging and commuting opportunities for bats are present on site, with linkages to adjacent woodland, and the PEA recommends that further surveys are conducted with a bat activity survey (nighttime walkover survey) to establish impact to bats. A lighting assessment and light spill plans have been provided and further changes

to the lighting scheme have reduced the light spill to reduce any impacts to bats. The applicant has requested that with this change whether the need for bat surveys can be reduced. It is recommended that light spill is equal or below to 1 lux on vegetation used by foraging bats and with the lighting changes light spill has been reduced to 1.13 Lux which we consider acceptable. The suggested walkover surveys augmented by static Bat detectors during May and June are an acceptable alternative combined with the precautionary lighting approach. This will enable an understanding of the species and presence of bats on the site. We await this information before providing further comments.

Some vegetation removal is also proposed to northern and eastern elevations of the pitch fencing and checks by a suitably qualified person will be conducted for birds prior to any removal. We suggest this also precautionary measures for bats for this vegetation removal, minimising pruning where possible, and this can be included within a precautionary works method statement (PWMS).

Great crested newts (GCN) have been considered within the PEA by the ecologist as 2 ponds are located within 250m but in isolated urban ponds. Foraging and shelter opportunities exist within the boundary vegetation for GCN but the majority of the site is a sports field, which is shown in aerial imagery to be regularly maintained, and therefore we consider that reasonable avoidance measures proposed in the PEA can be included within the PWMS, detailed in appendix A.

No signs of badger were reported but as they are a mobile species and as there is an adjacent woodland. Precautionary measures of preconstruction surveys are proposed to be included within the CEMP. Precautionary measures are also proposed for reptiles, breeding birds and hedgehogs and these also can be included within the PWMS. Suggested PWMS wording is provided in appendix A.

Lighting

Nocturnal animals (including bats) are likely to be using the site and surrounding area for foraging and commuting and any lighting associated with the proposal may have a negative impact, especially any light spill to scrub boundaries and trees on the site.

The lighting assessment and the design and access statement has discussed controlling light spill to nearby residential properties and upward light spill, but not on the adjacent vegetation where protected species may be present. Louvres have been suggested and the revised plans change a 6 column scheme to an 8 column scheme which allows for greater control over the light spill, which we approve of.

As detailed above further surveys have been proposed in the PEA to understand bat presence within the site.

Biodiversity Net Gain

A baseline assessment and BNG metric have been provided. The baseline assessment has been provided with a habitat map, and we are satisfied that this is representative.

The post development habitats have been provided, with developed land sealed surface, modified grassland and urban trees created. As there is limited opportunity for habitat creation within the area due to the sports use there is a BNG deficit of -20.16%, and a unit deficit of 1.02 habitat units.

We note there is a bund being created with spoil and this is not considered in post development habitats. We suggest that if appropriate this could be utilised to provide further habitat that could reduce the deficit.

As habitat creation may be required offsite, we direct the applicant towards the Kent Biodiversity Net Gain Site Register¹ available on the Making Space for Nature in Kent and Medway website. Biodiversity Net Gain Guidance for Kent is also available on this website.

Off-site gains/the purchase of biodiversity units will need to be subject to a deed of conservation covenants or Section 106 (as appropriate). Off-site gains must be registered² after determination. Section 106 agreement templates are available on the Planning Advisory Service website³.

If planning permission is granted, local planning authorities are encouraged to use suggested paragraphs for Biodiversity Gain Information on the written decision notice which are available to download here: https://assets.publishing.service.gov.uk/media/663251d969098ded31fca800/BNG_Decision_Notice_Text.odt. The applicant should submit a biodiversity gain plan form⁴ 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.

Enhancements

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for BNG, avoidance, mitigation and compensation. As such, we advise that an enhancement plan is provided that includes the actions proposed and the ownership and responsibilities for future management and a proposed condition wording is provided in appendix a.

Suggested biodiversity enhancements include the provision of durable bird/bat boxes, native tree/shrub planting, sowing of an appropriate wildflower mix, the creation of artificial refugia for reptiles/amphibians, the creation of 'hedgehog highways' (13×13cm gaps in closed board fencing) and/or creation of bug hotels/bee bricks for invertebrates.

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

¹ <https://www.makingspacefornaturekent.org.uk/bng/kent-biodiversity-net-gain-site-register/>

² [Register a biodiversity gain site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/register-a-biodiversity-net-gain-site)

³ [PAS Biodiversity Net Gain \(BNG\) Legal Agreement and Planning Condition Templates | Local Government Association](https://www.local.gov.uk/biodiversity-net-gain/bng-legal-agreement-and-planning-condition-templates)

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⁴ <https://www.gov.uk/government/publications/biodiversity-gain-plan>

Elizabeth Fagg
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Location plan, Labosport, 6/10/24
- Winter markings, Labosport, 8/1/25
- Preliminary ecological appraisal, Middlemarch, Dec 24
- Preliminary arboricultural assessment, Middlemarch, Aug 24
- Light survey, Signify, 30/10/24
- Lighting overspill, Labosport, 6/10/24
- Biodiversity statement and metric assessment, Dec 24
- BNG Metric

Appendix A

Suggested Precaution works method statement wording

From commencement of works (including site clearance), precautionary working methods are required regarding badger, bats, breeding birds, great crested newts and hedgehog. We advise that these are secured by condition. Suggested wording:

From commencement of works (including site clearance), to avoid impacts to protected and priority species, the following precautionary mitigation should be implemented:

- 1. Any hedgerow and trees to be retained, including its roots, will be protected from damage;*
- 2. Prior to any tree pruning (if required), checks for the potential presence of breeding birds and roosting bats, will be conducted by a suitably qualified person.*
- 3. Any required clearance of tall/dense vegetation with potential to support reptiles or great crested newts should be undertaken in two stages, with a first cut to 150mm, followed by a second cut several days later to ground level;*
- 4. Any work to vegetation/structures that may provide suitable bird 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 within the breeding bird season a survey by a suitably qualified person needs to be conducted to confirm absence, prior to commencing works.*
- 5. All excavations and trenches will 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) will be isolated within hardstanding areas and raised off the ground, e.g. on pallets.*
- 7. Measures will be in place to avoid pollution impacts from dust, water and run off, noise and lighting during the construction process.*
- 8. 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 will not resume until any required surveys and/or mitigation are completed.*

Suggested Ecological Enhancement condition

Within three months of works commencement, a detailed plan(s) showing how the development will enhance biodiversity, will be submitted to, and approved in writing by, the local planning authority. This will include a detailed landscaping plan, detail on ownership and responsibilities of the outlined management measures to achieve the proposed habitat target conditions, native and wildlife-friendly planting, and integrated durable bat and bird boxes aimed at species of conservation concern. The approved measures will be implemented and retained thereafter.