



ECOLOGICAL ADVICE SERVICE

TO: Kelly Joyce

FROM: Jonathan Lynch ACIEEM

DATE: 26 August 2025

SUBJECT: 20250236 / Finches Rhododendron Avenue Meopham Gravesend Kent DA13 0TU

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 – NO FURTHER INFORMATION REQUESTED

We have reviewed the ecological information submitted in support of this application and advise that **no further** information is requested from the applicant prior to determination of the planning application.

ECOLOGICAL CONSTRAINTS AND MITIGATIONS

We previously requested a Preliminary Roost Assessment (PRA) for bats given the potential for the proposals to impact roosting bats, which are protected from disturbance and harm by law. A PRA has been submitted which considers the potential for four onsite structures (referred to as B1, B2, etc) to support roosting bats. Two of these were assessed as having 'low' roosting potential, but no bats were observed utilising these structures during subsequent emergence surveys meaning we can presume roosting bats are likely absent from the site. The following standard informative wording is recommended as a precaution:

BAT INFORMATIVE: *There is a risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species Regulations 2017 (as amended) even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. 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.*

BIODIVERSITY NET GAIN (BNG)

We consider this application exempt from statutory BNG because it is a householder application as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

OTHER ENHANCEMENT MEASURES

No biodiversity enhancements are currently proposed. Paragraph 187(d) of the NPPF 2024 states: *“Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.”* This is notwithstanding any exemption from statutory BNG.

As the PRA does not contain any recommended biodiversity enhancements, the following generic condition is recommended:

GENERAL BIODIVERSITY ENHANCEMENT CONDITION: *Prior to any works above slab level, a Biodiversity Enhancement Plan (BEP) shall be submitted to and approved in writing by the local planning authority. The plan shall include full details of biodiversity enhancements which may include (as appropriate) provision of durable and suitably-placed bat/bird boxes, native wildflower sowing (with details of seed mixes/preparation and management measures), tree planting, the creation of hedgehog highways (by creating small 13×13cm gaps in closeboard fencing), the provision of bee bricks and/or the provision of log piles/artificial refugia for reptiles and amphibians.*

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

Reason: To protect and enhance biodiversity in accordance with Local Policy CS12, 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.

Jonathan Lynch ACIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Covering Letter (Blackburn Architects, February 2025)
- Existing Site Plan (Blackburn Architects, March 2025)
- Preliminary Roost Assessment and Bat Activity Surveys (Bee Wise Eco, July 2025)
- Proposed Site Plan (Blackburn Architects, March 2025)
- Site Location Plan (Blackburn Architects, February 2025)