



ECOLOGICAL ADVICE SERVICE

TO: Richard Hart
FROM: Helen Forster
DATE: 09 July 2026
SUBJECT: Nuralite Industrial Estate Higham 20260521

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.

Condition 11 states; *Prior to works (Other than the works shown on [Drawing No.23/171/14 - Nuralite Retaining Wall) commencing on a new phase (Including the first phase) an updated preliminary ecological appraisal and review and of the site wide mitigation strategy must be carried out and shall be provided by the applicant and submitted for approval to the Local Planning Authority in consultation with Natural England, Environment Agency and Kent County Council. The development shall thereafter be carried out in accordance with the most recent version of the Ecological Mitigation Strategy. For the avoidance of doubt the submitted information shall include, but not exclusively cover the following:*

- a) A preliminary ecological appraisal - less than one year old.*
- b) Review of existing survey data and updates of any surveys required.*
- c) Review of and update of existing mitigation plans.*
- d) Detailed methodology to implement mitigation.*
- e) Details of habitat creation required for ecological mitigation and habitat creation areas.*
- f) Methodology to implement habitat creation.*
- g) Timings of proposed works for ecological mitigation and habitat creation areas.*
- h) Maps showing the following:*
 - 1) Existing habitat plan;*
 - 2) Proposed mitigation areas;*
 - 3) Habitat Creation Areas.*

- i) Details of who will carry out the works.*
- j) Interim management plan for mitigation/habitat creation works.*
- k) Update on what works have already been carried out on site.*
- l) Letter from the applicants ecologist confirming why they are satisfied that the currently site wide mitigation strategy and habitat creation plan is still valid OR Updated site wide mitigation strategy and habitat creation plan informed by required, updated species or habitat surveys.*

An updated ecological mitigation strategy as required by the condition must be submitted prior to the discharge of the condition.

The ecological surveys submitted with the original application detailed the following:

- Low populations of slow worm
- Low population of common lizards (confirmed breeding population)
- Anecdotal evidence of grass snake
- 5 pipistrelle bat roosts in the buildings
- Likely leisler's bat, soprano pipistrelle and brown long eared bat roosts in the trees along the western section.
- At least 7 species of foraging bats
- At least 30 species of breeding birds
- Potential for water vole

Paragraph 1.12.2 of the letter from greenspace ecological solutions detailed that it is considered that the potential for protected and notable species to occur within the site is broadly similar to the 2018/2019 surveys. Therefore we do accept that there is no requirement for breeding bird or reptile surveys to be carried out.

However there is a need for the updated bat surveys to be carried out to finalise the required bat mitigation for the demolition of the buildings. We understand that the remaining buildings within the site may not be demolished for a couple of years and we agree that the required bat surveys should be carried out the season before demolition works are required. However due to this we advise that the condition can not be fully discharged as a further updated mitigation strategy will be required to address the mitigation requirements of the demolished building.

The previous surveys stated there was potential for water vole to be present and advised that a further survey was required. This has not been addressed within the report – however we do accept that due to the asbestos within the site it may not be possible to carry out a survey following best practice guidelines.

The report has detailed that there is no change to the ecological mitigation previously agreed. However there has been change within the habitats within the site over the last 8 years and therefore we would expect an updated mitigation strategy to be submitted as part of this application with clear plans demonstrating where the ecological mitigation is to be implemented and where any receptor sites are located.

We advise that the submitted information is not sufficient to discharge this condition.

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Letter from Green space Ecological Solutions dated 8th September 2025