



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher

FROM: Helen Forster

DATE: 19 May 2025

SUBJECT: 388 Rochester Road, Gravesend 20240303 20250414

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.

Our comments are largely similar to the ecological advice provided for application 20250414. No ecological information has been submitted with this application. As a result of reviewing the data we have available to us, and the information submitted with the planning application, we advise that the proposed development has limited potential to result in significant ecological impacts.

We have taken this view as the photos provided by the applicant indicate that the dwelling and garage to be impacted by the proposed development is in good condition which will limit opportunities for roosting bats. As such we are satisfied that there is no requirement for an ecological survey to be carried out.

Lighting

Lighting can have a negative impact on bats (and other nocturnal species) and therefore any lighting must be designed to minimise light spill. The submitted information has detailed that low UV lighting will be installed.

We recommend that if planning permission is granted the **lighting condition** has the following requirements:

- Be designed following best practice guidance within Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 08/23 Bats and Artificial Lighting at Night'¹
- Downward facing and on motion sensors

Ecological 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.

The submitted information has detailed that the following enhancement features will be incorporated in to the site:

- 2 bat boxes
- 6 bird boxes
- 1 bug hotel
- Hedgehog highways in any close board fencing.

However the exact locations have not been confirmed and therefore we recommend the following condition is included:

Prior to completion, a plan demonstrating where the enhancements detailed within the Proposed Biodiversity Action will be located must be submitted to the LPA for written approval. The approved measures will be implemented and retained thereafter.

SAMMS

The development includes proposals for new dwellings within the zone of influence (6km) of the Thames Estuary and Marshes Special Protection Area, and its associated Wetland of International Importance under the Ramsar Convention (Ramsar Site). Gravesham will need to ensure that the proposals fully adhere to the agreed approach within the North Kent Strategic Access Management and Monitoring Strategy (SAMMS). This is to mitigate for additional recreational impacts on the designated sites and to ensure that adequate means are in place to secure the mitigation before first occupation.

A decision from the Court of Justice of the European Union has detailed that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a full Appropriate Assessment is needed under the Habitats Directive. Therefore, we advise that due to the need for the application to contribute to the North Kent SAMMS, there is still a need for an appropriate assessment to be carried out as part of this application.

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

Helen Forster MCIEEM
Biodiversity Officer

¹ ['Bats and Artificial Lighting at Night' ILP Guidance Note update released - News - Bat Conservation Trust](#)

This response was submitted following consideration of the following documents:
Existing and Proposed Block Plan; Sahota Architectural services; January 2025
Photographic Report; DAC Architects; May 2024
Proposed biodiversity action; No date