



## ECOLOGICAL ADVICE SERVICE

**TO:** Rebecca Harrison

**FROM:** Helen Forster

**DATE:** 16 September 2024

**SUBJECT:** Custom House, Gravesend 20210757

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*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.*

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We previously commented on application 20210757 and advised that the submitted ecological information was sufficient to determine the planning application.

We have reviewed the proposed amendments and we advise that we are satisfied that the ecological information is also valid for this application. We have taken this view as the previous surveys concluded that bats were unlikely to be roosting within the buildings. Therefore the two additional roof lights are proposed for the building previously known as the workshop are unlikely to impact roosting bats.

We do not require any further information to be submitted as part of this application.

**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  
Bat Survey Report; Native Ecology; September 2023

#### *Comments provided for application 20210757*

We advise that sufficient information has been provided to determine the planning application.

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 when we originally commented 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.* As such when we originally commented we highlighted that it was 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.

An updated bat survey report has been submitted and it has re-evaluated the potential of the buildings to be used by roosting bats and downgraded the assessment of buildings 1, 5, 6 and 7. We have reviewed the documents and spoken to the ecologist and we advise that we are satisfied that the re-evaluation is appropriate.

No bats were recorded emerging from any of the buildings and 3 species were recorded foraging/commuting within the site. The surveys of buildings 2, 5, 6 and 7 were carried out at the end of the bat survey season but we are satisfied with the conclusions of the surveys as there was very limited bat foraging/commuting activity within the site – partly due to the high light levels.

The report has made recommendations for enhancing the site for bat by including bat roosting features within the building and we advise that these measures are appropriate and must be implemented if planning permission is granted. We recommend that the requirement for integrated bat roosting features are a requirement of the **construction and management plan condition** wording.

#### **Other Species**

We advise that we are satisfied that impacts on other species can be avoided through a precautionary mitigation approach. We recommend that the details of the precautionary mitigation are included within the construction management plan and are a requirement of the **construction and management plan condition** wording.

#### **Landscaping and Enhancements**

The landscaping plan has confirmed that native species planting will be incorporated into the site which should benefit biodiversity.

We note that it is proposed to planting on the shingle beach and we spoke to the ecologist about this recommendations. We understand that it is to enhance the existing vegetation and not to replace it. We are satisfied that the proposed planting is appropriate and must be implemented as detailed in the landscaping plan.

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