



ECOLOGICAL ADVICE SERVICE

TO: *Nina Goodbody*

FROM: *Philippa Bromley*

DATE: *14 January 2026*

SUBJECT: *20260012: 62 Kings Drive, Gravesend*

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: ADDITIONAL INFORMATION REQUIRED

We have reviewed the 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 prior to determination:

- Preliminary Roost Assessment

Bats

No ecological information has been submitted with this application. As a result of reviewing the data we have available to us, we advise that the proposed development has the potential to adversely affect roosting bats which need to be considered as a demolition is proposed.

Bats and their roosts are fully protected from disturbance and harm through the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Some species of bat (including Bechstein's, noctule, soprano pipistrelle and brown long-eared) are also listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as Species of Principal Importance for conservation. Local planning authorities must have regard for the conservation of Section 41 species and all bat species as part of their planning decisions¹⁵.

The existing structures proposed for demolition appears to have wooden fascias, eaves, soffits and felt roofs which could be potential roost features (PRFs) which may support roosting bats. Bats often roost under tiles, roofing felt and lead flashing, adjacent to windowsills and windowpanes and within cracked brickwork, lifted rendering, weatherboarding, eaves and soffit boxes. As these proposals may adversely affect bats, a Preliminary Roost Assessment (PRA) for bats is requested.

If the PRA identifies roosting bat suitability to be present and impacted by the development, it is likely that further surveys for bats will need to be carried out. The results of the necessary surveys carried out, and details of any mitigation required should be submitted prior to determination of the planning application. This is in alignment with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005¹⁷, which states *“it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”*.

Should bats be found to be roosting in the buildings proposed for alteration/demolition, a mitigation licence may be required from Natural England for works to proceed.

Enhancements

The proposed development provides opportunities to incorporate features into the design which are beneficial to wildlife, such as native species planting and the installation of integrated bat/bird nest boxes. We advise that measures to enhance biodiversity are secured as a condition of planning permission, if granted. This is in accordance with Paragraph 193 of the NPPF that *“opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity”*. We can suggest condition wording once we have received the additional information required.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications¹ for development (unless exempt^{2,3}), must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

All exemptions from statutory BNG are laid out in The Biodiversity Gain Requirements (Exemptions) Regulations 2024. The exemptions are:

- The temporary exemption for small developments (applied until 2 April 2024)
- The *de minimis* exemption (development affecting <25m² area habitat or 5m linear habitat)
- Householder applications

¹ All planning applications for major development (unless exempt) submitted on or after 12th February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2nd April 2024.

² Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

³ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

- High Speed Railway Transport Network
- Biodiversity gain sites (to satisfy another development's biodiversity gain objective)
- Self-build and custom build applications

Other types of planning application (retrospective, prior approval, condition discharges, etc) are also not subject to statutory BNG as it is a post-permission matter for full and outline consents only.

Philippa Bromley
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Plan & Elevations as Existing (DAC Architects, June 2025).
- Plan, Elevations & Section As Proposed (DAC Architects, November 2025).
- Site Location Plan (DAC Architects, December 2025).
- Block Plan as Existing (DAC Architects, December 2025).
- Block Plan as Proposed (DAC Architects, December 2025).
- Design & Access Statement (DAC Architects, January 2026).