



ECOLOGICAL ADVICE SERVICE

TO: Katherine Parkin
FROM: Helen Forster
DATE: 20 March 2026
SUBJECT: Boughurst Farm Meopham 20251249

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.

SIMPLIFIED RESPONSE

In providing the following comments, all relevant information has been considered including ecological information (where submitted) and site plans. In addition, other documents when considered useful have been reviewed. This will include (but not limited to) the design and access statement and arboricultural reports.

Additional supporting information and suggested condition wording can be found at the end of the report

SUMMARY – SUFFICIENT INFORMATION

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

Ecological Element	Present on site	Add Info	Comments
Protected/ Notable Species	The ecological reports has confirmed that the building supports a common pipistrelle roost (peak count 11) and a brown long eared roost (peak count of 3). The	No	Bats We are satisfied that the bat mitigation proposed is appropriate and we have provided suggested condition wording at the end of the report.

	report has confirmed there is potential for breeding bats to be present A bat mitigation strategy has been submitted and appropriate mitigation. The proposal will result in the permanent loss of one common pipistrelle roosting feature and the temporary impact on the brown long eared roost during construction.		We are satisfied that the proposed mitigation is appropriate to enable GBC be satisfied that the favourable conservation status can be met and, from the point of view of the third test, NE will issue a European Protected Species (EPS) licence. Further details on the 3 test can be found below. We highlight that the bat mitigation strategy has stated the following regarding roofing felt to be used during the construction. <i>Under bat mitigation licences, only bitumen Type 1F with hessian matrix can be used in areas where bats are likely to roost; if the use of non-bitumen coated roof membrane is necessary, a certificate that proves the roofing membrane has passed a 'snagging propensity test' will be needed by Natural England¹⁷. As pipistrelle bats are likely to go and roost under the clay tiles in the extension, this applies to the entire roof (existing and new), as well as any areas of hanging tiles.</i> No works can commence on site until Natural England Issue an EPS licence. Breeding Birds We recommend a breeding bird informative is included.
Biodiversity Net Gain (BNG)	Exempt	No	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.
Lighting	If any additional lighting is proposed we advise that a sensitive Scheme is required.	No	Suggested condition wording provided at the end of the report

Additional Information

European Protected Species Licence

As Gravesham Borough Council must consider whether it is not unlikely that a Natural England mitigation licence will be granted, in so doing it must address the three tests when deciding whether to grant planning permission for the proposed development.

The three tests are:

- 1. Regulation 55(2)(e) states: a licence can be granted for the purposes of “preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment”.*
- 2. Regulation 55(9)(a) states: the appropriate authority shall not grant a licence unless they are satisfied “that there is no satisfactory alternative”.*

Regulation 55(9)(b) states: the appropriate authority shall not grant a licence unless they are satisfied “that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.”

Suggested Conditions Wording

Bat Mitigation

Prior to and during construction works the bat mitigation detailed within the Bat survey and mitigation strategy (KB Ecology; December 2025) must be implemented as detailed unless subsequently amended by the Natural England Licence. If works have not commenced within 2 years of the date of the report a review and update of the mitigation strategy must be carried out prior to works commencing. On completion of the mitigation a letter must be submitted to the LPA for written approval to demonstrate that the mitigation has been implemented.

Sensitive Lighting (if any external lighting is proposed)

The condition requiring a lighting plan must have 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
- Site plan showing the location and types of lighting
- Plans demonstrating the lighting will not impact the roosting features.
- Lighting must be downward facing and/or on motion sensors.

Breeding Bird Informative

The applicant is reminded that, under the Wildlife and Countryside Act 1981 (as amended), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this Act.

Habitats are present on and around the site that provide opportunities for breeding birds. Any work to vegetation/structures that may provide suitable nesting habitats should be carried out outside of the bird breeding season (1st March to 31st August inclusive) to avoid destroying or damaging bird nests in use or being built. If vegetation/structures need to be removed during the breeding season, mitigation measures need to be implemented.

This includes examination by a suitably qualified and experienced ecologist immediately prior to starting work. If any nesting birds are found, works must cease until after the birds have finished nesting.