



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher
FROM: Helen Forster
DATE: 11 August 2025
SUBJECT: Premier Inn, Gravesend 20241069

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.

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 further information is sought from the applicant with regards to the potential for ecological impacts to arise.

The proposal is for the extension of an existing building and the works will impact weather boarding and a tiled roof and these features may support roosting bats. As such, an Ecological Impact Assessment (EclA) should be undertaken by a suitably qualified ecologist¹, in accordance with good practice guidelines.

The EclA will include the following:

- Details of the impacts of development proposals on the ecological baseline established via a Preliminary Roost Assessment (PRA) and any necessary additional emergence surveys undertaken;
- Details of any necessary and achievable ecological mitigation and/or compensation measures;
- Details of ecological enhancement measures, and;

¹ Suitably qualified ecologists can be found using either the: [CIEEM Registered Practice Directory](#) or the [Environmental Data Services Directory](#).

- Provision of sufficient information to determine whether the project accords with relevant nature conservation policies and legislation.

To ensure that the planning determination is adequately informed in respect of all potential ecological impacts, we advise that the EclA is sought prior to determination of the planning application. This is in alignment with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005² 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”*.

The EclA will also ensure alignment with the National Planning Policy Framework (NPPF) 2024 and the Natural Environment and Rural Communities Act (NERC) Act 2006. Under section 40 of the NERC Act 2006 and paragraphs 187 and 193 of the NPPF 2024 biodiversity should be maintained and enhanced through the planning system.

We highlight that it is currently the bat survey season therefore the PRA and therefore we recommend that the PRA is carried out as soon as possible as it may enable bat surveys to commence this year.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications⁶³ for development (unless exempt^{64,65}), 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.

Having reviewed submitted information⁶¹, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development.

Any application which is required to achieve a 10% BNG must submit the following information as a minimum³:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- **the pre-development biodiversity value(s), [either on the date of application or earlier proposed date \(as appropriate\)](#);**
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- **[the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;**

² [odpm-circ-0605.qxd \(publishing.service.gov.uk\)](#)

³ <https://www.gov.uk/guidance/biodiversity-net-gain#para11>

- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have:
 - a statement to the effect that these activities have been carried out;
 - the date immediately before these activities were carried out;
 - the pre-development biodiversity value of the onsite habitat on this date;
 - the completed metric calculation tool showing the calculations, and
 - any available supporting evidence of this;
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

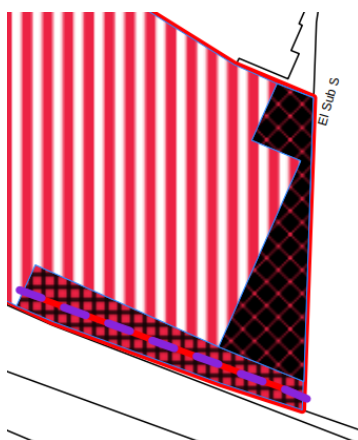
It is our view that the incorrect baseline has been submitted as part of this application.

From looking at the aerial photos it appears that the vegetation at the south of the site is a hedgerow and then there is ornamental shrubs to the west. The hedgerow will be partially lost and but the ornamental shrubs will be retained.

However the metric details the following habitats will be present.

	Developed land; sealed surface
	Vacant or derelict land
	Introduced shrub
	Vegetated garden

According to the plan the vegetated garden and the vacant or derelict land is in the corner where the extension will be located:



The key is a bit confusing but we believe the vacant land is the black back ground with red hatching and the vegetated garden is the red background with black hatching. We are unable to see any of these habitats from looking on google maps or street view. In

addition the metric states that the vegetated garden will be retained which is clearly not the case.

We advise that an updated metric with the correct baseline is submitted prior to determination.

A form has been submitted confirming that the applicant can purchase off site units to enable the application to demonstrate a BNG of over 10% for habitats and linear features. However as the baseline is wrong we are unable to confirm if the correct number of units are proposed to be purchased.

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

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Proposed Site Plan; Rev B; December 2024
- Biodiversity Gain Plan dated 22nd November 2024
- Small Site Metric; Dated 22nd November 2024