



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher
FROM: Elizabeth Fagg
DATE: 06 July 2026
SUBJECT: 20260258 Premier Inn, 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 appeal application and advise that insufficient ecological information has been provided to determine the application. The following information is required:

- Ecological survey, noted in the planning statement.

PROTECTED SPECIES AND HABITATS

No protected or priority species survey information has been submitted with this application, but we notice that the planning statement Section 9 states that '*An ecological survey of the building was undertaken to assess potential impacts on protected species. The survey identified no bat roosts within the building and recorded only low levels of foraging activity in the surrounding area. The report concluded that the proposed development could proceed without the need for a bat mitigation licence. Standard precautionary measures during construction will ensure compliance with wildlife legislation.*'

This ecological survey will need to be submitted so we are able to verify if the survey is within suitable relevant dates and survey is considered current data, evaluate the findings and make appropriate recommendations. The building has a tiled roof and wooden

cladding so could have potential suitability for roosting bats. As there is foraging activity noted above we highlight that any changes to lighting will require a sensitive lighting strategy to ensure there are no impacts to bats.

Lighting in the vicinity of a bat roost or along commuting / foraging routes could constitute an offence both to a population and to individuals. Artificial lighting has been shown to be particularly harmful to bats along river corridors, near woodland edges and near hedgerows¹. Local authorities have a duty to ensure impacts upon legally protected species are avoided and impacts upon bats are a material consideration in any planning permission under the Natural Environment and Rural Communities (NERC) Act 2006 and through the NPPF 2024.

We can provide further comments once the further information is received.

DE MINIMIS (APPLICABLE)

Having reviewed the proposals we consider this application to be exempt from mandatory biodiversity net gain, so that mandatory biodiversity net gain of 10% will not apply. The application form notes a de minimis exemption is applicable as the works are all internal building works to the existing building.

We consider this application exempt because:

- The development will not impact any onsite priority habitat; AND
- The development will not impact more than 25 square metres of onsite habitat with a biodiversity value greater than zero; AND
- The development will not impact more than 5 metres of onsite linear habitat.

N.B: Habitats with a biodiversity value of zero include: buildings, hardstanding, unvegetated garden, and artificial unvegetated; unsealed surface.

Please note that bare ground will attract a biodiversity value greater than zero within the metric.

A metric and biodiversity gain plan have been submitted which are not required if exempt, and it shows 4 small trees will be planted, creating 0.0498 habitat units. We highlight the proposed trees are not evident on the proposed plans. We consider as this is BNG exempt that the tree planting, if feasible within the site, can be included within an enhancement plan.

ENHANCEMENTS

The proposed development provides opportunities to incorporate features into the design which are beneficial to wildlife, such as native species planting, with tree planting as noted above, and others such as the installation of bat/bird nest boxes on the building or within adjacent trees could be implemented. We advise that measures to enhance biodiversity

¹ Bats and Artificial Lighting guidance. Available [here](#).

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*”. An enhancement plan can be conditioned.

Elizabeth Fagg
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Existing site plan, Rev B, 4/3/26
- Proposed site plan, Rev E, 4/3/26
- Planning statement undated
- Design and access statement, undated
- Small sites metric, Completed 27/3/26
- Biodiversity gain plan, dated 27/3/26