



ECOLOGICAL ADVICE SERVICE

TO: *Alison Webster*

FROM: *Hannah Simmons*

DATE: *14 August 2024*

SUBJECT: *PRE20240151 / Former Tollgate Hotel, 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.

We have reviewed the ecological information submitted with this pre application submission and advise that we are satisfied that there is no requirement for any further ecological surveys to be carried out at this point.

Bats

Three of the four buildings have moderate potential for roosting bats and were assessed as offering moderate potential for roosting bats but from the surveys in 2022, no bats were observed emerging from or re-entering the buildings. Additionally, all three of the scattered trees present were considered to have negligible potential to support a roost. However, the bat surveys are now over 18 months old.

A Preliminary Roost Assessment (PRA) in March 2024 determined that although new access points are present in the buildings, this does not increase their value for roosting bats from moderate. Therefore, we are satisfied that the results of the 2022 surveys are still currently valid, and the mitigation recommendations as outlined in the bat survey report still apply.

As the condition of the site is deteriorating and new access points are being created, we advise that if a future application has not been submitted within a year, then another PRA

may be required to determine if the building value for roosting bats has increased and if further bat surveys will be required.

Lighting

Common and Soprano Pipistrelle, Serotine, Brown Long eared and Noctule bats were observed commuting and foraging on site. A Lighting Impact Assessment including a proposed lighting layout plan has been submitted. The site is currently highly illuminated by the roads surrounding the site, which includes the A2. As such, the assessment has determined that there will be no significant additional light pollution from the subject site.

From the proposed plan, we are satisfied that there will be minimal impact to the proposed habitats on site from the proposed lighting. If the layout changes with any future application, the lighting plan will also need to be updated to reflect any changes.

Breeding Birds and Hedgehogs

We are satisfied that the proposed mitigation in the EcIA for breeding birds and hedgehogs, identified as having potential to be on site, are sufficient.

Biodiversity Net Gain and Ecological Enhancements

Under section 40 of the NERC Act 2006 and paragraph 180 of the NPPF 2023, biodiversity should be maintained and enhanced through the planning system. Additionally, in alignment with paragraph 186 of the NPPF 2023, the implementation of measurable net gains for biodiversity (integrated as part of design) should be encouraged.

A Statutory Biodiversity Net Gain (BNG) Metric has been submitted with this pre-application submission. We note that from the calculations, BNG cannot be achieved onsite. However, offsite gains will mean a net gain of 14.81% overall will be achieved. Details of the offsite gains and their location should be included in a Biodiversity Net Gain Plan and submitted with any future application.

We would also expect any plans submitted to include details on how other ecological enhancements will be integrated into the development over and above any mitigation required. Examples for a development of this type includes bat and bird boxes, log piles, hibernacula, and hedgehog homes and holes in close-board fencing.

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

Hannah Simmons
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Pre-Application Draft Ecological Impact Assessment. Eco Tech Ecological Consultancy. May 2024
- Pre-Application Draft Bat Survey Report. SLR Consulting Ltd. 29 October 2022
- Statutory Biodiversity Net Gain Metric. 15 May 2024
- Pre-Application Draft External Lighting Environmental Impact Assessment. GW Lighting Consultancy. 8 March 2024
- Preliminary Roost Appraisal. SLR Consulting Limited. 22 March 2024