



ECOLOGICAL ADVICE SERVICE

TO: *Lisa Fisher*

FROM: *Annalice Line*

DATE: *07 May 2025*

SUBJECT: *20250281: Ebbfleet Grill, 1 - 2 Stonebridge Road, Northfleet*

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 – FURTHER INFORMATION REQUIRED

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 following information is required:

- Preliminary Roost Assessment

Bats

Features suitable for protected species in particular bats are present on site, indicating ecological value and the potential for protected species presence that must be taken account of in the planning decision. We have taken this view as the building slated for demolition is in poor condition and has multiple access points that could be used by roosting bats, the deteriorated state of the building increases the likelihood of such features being present. Bats often roost under tiles, roofing felt, and lead flashing, adjacent to windowsills and windowpanes, within cracked brickwork, lifted rendering, weatherboarding and eaves.

Therefore, we recommend that a Preliminary Roost Assessment be conducted by carried out by a suitably qualified ecologist to evaluate the likelihood of bats being present on the site.

The results of the survey should be submitted within an Ecological Impact Assessment (EIA), produced in accordance with the latest Chartered Institute of Ecology and Environmental Management (CIEEM) guidelines. The results of any necessary emergence surveys, and mitigation/compensation measures, will need to 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 06/2005, 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”*.

Biodiversity Net Gain

Further, the applicant has indicated within the application form that they do not consider the general Biodiversity Gain Condition applies to this application. As the proposal does not have any vegetation within the site, we agree with this position due to the development being subject to the *de minimis* exemption:

- 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.

As such, we are satisfied that there is no requirement for a statutory biodiversity metric to be carried out at this time.

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. Although BNG is not required we advise that ecological enhancement features must also be incorporated into the site. If planning permission is granted, we recommend that an ecological enhancement plan is included. Enhancements include bat and bird boxes and bee bricks within the site and buildings. We suggest the following:

Within 3 months of works commencing within the site an ecological enhancement plan must be submitted to the LPA for written approval. The plan must demonstrate how the site will enhance biodiversity through the inclusion of ecological enhancement features within the buildings. The plan must be implemented as approved.

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

Annalice Line
Graduate Biodiversity Officer

This response was submitted following consideration of the following documents:

- Site Plan (Besa Architectural Design Ltd., March 2025)

- Existing and Proposed Block Plans (Besa Architectural Design Ltd., March 2025)
- Existing Ground Floor Plan (Besa Architectural Design Ltd., March 2025)