



ECOLOGICAL ADVICE SERVICE

TO: Alison Webster
FROM: Helen Forster
DATE: 28 October 2024
SUBJECT: Huggens College, Northfleet 20240402

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 advise that additional ecological information is required prior to determination of the planning application.

Biodiversity Net Gain

A Biodiversity Net Gain Report has been submitted and detailed that the proposal will result in a BNG for habitats over 10%. However the Excel Metric has not been uploaded on to the portal. We advise that copy of the metric must be submitted to enable us to fully consider if we agree with the conclusions.

Protected/Notable Species

The ecological report has confirmed that there are two common pipistrelle roosts within the site, at least two species of foraging / commuting bats within the site and suitable habitat for breeding birds.

The bat roosts have been recorded within the chapel (which is to be retained) and building 7 (to be demolished). As the bat roost in building 7 was considered to be a small maternity roost we advise that a plan clearly demonstrating where the replacement roost will be located must be submitted prior to determination of the planning application.

As European Protected Species are present Gravesham BC must consider whether it is likely 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”*.
3. 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.”*

We advise that we are only able to comment on the 3rd test and we advise that until it can be demonstrated that appropriate mitigation can be implemented GBC can not be satisfied that the favourable conservation status of bats can be maintained.

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:
Biodiversity Net Gain Report; Kent Sussex Ecology; April 2024
Bat Emergence Survey; Kent Sussex Ecology; October 2023
Preliminary Ecological Appraisal; Kent Sussex Ecology; July 2023