

Delegated Report

Approval of Details Application

Planning Application No: 20250820

Location: Hopehill Campsite Wrotham Road South Street Meopham

Description: Application for approval of condition 4 and 5 attached to planning permission reference number 20241003 relating an updated bat mitigation strategy and a biodiversity gain plan, a habitat management and monitoring plan.

Applicant: Mr Fraser Patrick, Gravesend District Scout Council

Site Visit Date: **Desktop Assessment**

Submitted Documents/Plans

Planning Application Form received 13th August 2025;
BNG Metric received 13th August 2025;
Biodiversity Gain Plan received 13th August 2025;
Revised Bat Emergence and Re-Entry Surveys (BERS) – received 22nd September 2025;
Bat Mitigation Plan received 13th August 2025;
Drawing No. 1218_A_58 - Roofspace Analysis for Brown Long Eared Bats received 1st October 2025.

Relevant Planning History

Reference	Description	Decision	Decision Date
20241003	Extension and alterations to existing toilet and shower block.	Permitted	10.02.2025

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-Designed Places
- Section 13 – Protecting Green Belt Land
- Section 15 – Conserving and Enhancing the Natural Environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)

Consultations, Publicity and Representations

Consultees

KCC Biodiversity

Condition 4

29.08.25 – **Condition 4** states: Prior to works commencing within the site an updated bat mitigation strategy must be submitted to the LPA for written approval. The plan must include the following:

- Updated bat emergence surveys (if required)
- Overview of mitigation required
- Detailed methodology to implement the mitigation.
- Plans demonstrating that the bat mitigation will be incorporated into the building.
- Details of any monitoring required.

The plan must be implemented as approved.

We advise that additional information is required prior to the discharge of the condition.

The ecological information submitted with the planning application detailed the following:

The report has detailed the following:

- Common pipistrelle day roost x 2 individual bats from the gap in the eaves at the northern elevation. These bats could be roosting in the gap itself or within the loft void.
- 2.
- Common pipistrelle day roost x 1 individual bat from the northwest corner, between the ridge and the roofing material.
- Long-eared day roost (multiple individuals judging from the number of droppings) at the ridge beam at the north-west end of the barn

When we commented on the original application we highlighted that the bat surveys were carried out at the end of the survey season and therefore it is possible that the surveys were too late to record a long eared maternity roost. However we are satisfied from reviewing the submitted site plans that the loft space would be retained as plans were submitted to demonstrate no light will enter into the loft from the rooflights as sun pipes would be used.

The submitted mitigation strategy has detailed that the roof and eaves will be removed and a bat loft cannot be incorporated into the site as the building structure and materials do not allow for

this.

We advise that additional information is required clarifying why the plans have changed since the original application was submitted and the loft will not be retained within the site.

10.10.25 - Condition 4 states: Prior to works commencing within the site an updated bat mitigation strategy must be submitted to the LPA for written approval. The plan must include the following:

- Updated bat emergence surveys (if required)*
- Overview of mitigation required*
- Detailed methodology to implement the mitigation.*
- Plans demonstrating that the bat mitigation will be incorporated into the building.*
- Details of any monitoring required.*

The plan must be implemented as approved.

The ecological information submitted with the planning application detailed the following:

- Common pipistrelle day roost x 2 individual bats from the gap in the eaves at the northern elevation. These bats could be roosting in the gap itself or within the loft void.
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- Common pipistrelle day roost x 1 individual bat from the northwest corner, between the ridge and the roofing material.
- Long-eared day roost (multiple individuals judging from the number of droppings) at the ridge beam at the north-west end of the barn

When we commented on the original application we highlighted that the bat surveys were carried out at the end of the survey season and therefore it is possible that the surveys were too late to record a long eared maternity roost. However we accept from reviewing the additional information provided the planning officer that it is unlikely that the site supports a long eared maternity roost as higher dropping numbers would have been recorded.

The submitted mitigation strategy has detailed that the roof and eaves will be removed and a bat loft cannot be incorporated into the site as the building structure and materials do not allow for this.

We have reviewed the additional information provided and accept that a bat loft following the bat mitigation guidelines cannot be created within the site. However there is space within the roof to provide opportunities for roosting bats and we would recommend that access points and bat boxes are incorporated into the loft space to enable the bats to roost within the building.

We advise that we accept that the proposed mitigation of 3 integrated bat boxes and at least 1 bat box erected on to the trees are sufficient to discharge the condition.

Condition 5

BIODIVERSITY GAIN CONDITION DISCHARGE and DISCHARGE OF CONDITION 5 This development requires a 10% mandatory biodiversity net gain under legislation.

Deemed Condition: *The general biodiversity gain condition as per Schedule 7A, Section 13(1) of the Town and Country Planning Act 1990 is that the development may not be begun unless—*
(a) a biodiversity gain plan has been submitted to the planning authority, and (b) the planning authority has approved the plan.

Condition 5 states: *Prior to the commencement of works, a biodiversity gain plan, a habitat management and monitoring plan shall be submitted to and approved, in writing, by the Local Planning Authority. The plan must detail how any on site habitat creation and enhancement is managed and monitored in the long term. The plan must be implemented as approved.*

We have reviewed the submitted documents (Biodiversity Gain Plan and Statutory metric) in relation to the general biodiversity gain condition of permission and advise that sufficient

information has been provided to discharge the deemed condition and condition 5. Off-site BNG has been achieved through the purchase of 0.02 units at an off site habitat bank site. We advise that as BNG is being achieved via an off site habitat bank we advise that the Habitat Management Plan is not required for the discharge of the condition 5.

Table 1 shows a summary of the information as submitted. Further details are provided in Table 2.

Table 1: To show a summary of our review of submitted information

Percentage Net Gain Required	Percentage Net Gain/Loss Reported for Area Habitats	Percentage Net Gain/Loss Reported for Linear Habitats	Net Gain Proposed: 1 – all on-site; 2 – no significant on-site and off-site; 3 – significant on-site and off-site; 4- All Off Site	On-site 'significant' Net Gains Proposed (Yes/No)
10%	10%	N/A	All Off Site	No

Detailed Comments

Legislation and government standing advice indicates that the information shown in Table 21 needs to be submitted to and approved by the local planning authority as part of the 'deemed condition' biodiversity gain plan prior to commencement of development.

References to the biodiversity value of any habitat or habitat enhancement are to its value as calculated in accordance with the biodiversity metric. As such, a copy of the completed biodiversity metric calculation tool, in excel spreadsheet format, has been submitted as part of this submission in conjunction with the biodiversity gain plan. The local planning authority must approve the biodiversity gain plan; without approval, the development may not commence.

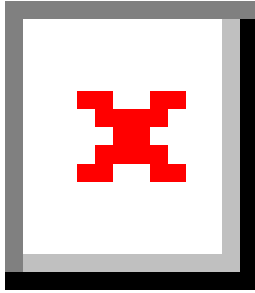
Table 2: To show the information required for the biodiversity gain plan under legislation and as indicated by government standing advice, and whether the submitted information is sufficient.

Information Needed	Provided	Comments
The steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat. And, (except for onsite irreplaceable habitats) a description of how the biodiversity gain hierarchy will be followed and where to the extent any actions (in order of priority) in that hierarchy are not followed and the reason for that.	Yes	The applicant is required by law to deliver biodiversity gains in accordance with the biodiversity gain hierarchy, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 Section 37A. We are satisfied that the applicant has appropriately applied the hierarchy to this development.
The <u>relevant date</u> , for the purposes of calculating the pre-development biodiversity value of onsite habitats and if proposing an earlier date, the reasons for using this earlier date.	Yes	With the original application, the applicant has provided the date of 20th June 2024 as the date of the pre-development biodiversity value calculation, which is the date the metric was completed post ecological walkover survey. This is considered acceptable to inform the application.
The <u>completed biodiversity metric</u>	Yes	We have reviewed the metric and we are

1 For development not proceeding in phases. For phased development there are different requirements for the Biodiversity Gain Plan.

calculation tool(s) , stating the publication date of the tool(s), and showing the calculation of the pre-development onsite value on the relevant date , and post-development biodiversity value. And, evidence that biodiversity gain objective can be met.		satisfied that it has been correctly filled in and no amendments are required.																			
Pre-development and post-development plans showing the location of onsite habitat (including any irreplaceable habitat) on the relevant date , and drawn to an identified scale and showing the direction of North.	No	No pre and post development plans have been submitted as part of this condition discharge.																			
A description of any irreplaceable habitat on the land to which the plan relates which exist on the relevant date , and any part of the development for which planning permission is granted where the onsite habitat of that part is irreplaceable habitat, arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.	N/A	None present on site																			
If habitat degradation has taken place: • a statement to this effect, • the date immediately before the degradation activity, • the completed biodiversity tool showing the calculation of the biodiversity value of the onsite habitat on that date, and • any available supporting evidence for the value.	Yes	The applicant indicated that no on-site habitat degradation has occurred since 30th January 2020. This is corroborated by a review of aerial imagery (Google Earth Pro, accessed August 2025).																			
Where any registered off-site biodiversity gain is specified in the plan and allocated to the development: - o The registered off-site biodiversity gain is so allocated (and, if the allocation is conditional, that any conditions attaching to the allocation have been met, or will be met by the time to development begins), and - o The registered off-site biodiversity gain has the biodiversity value specified in the plan in relation to the development.	Yes	We advise that we are satisfied that an off-site BNG of at least 10% can be achieved through the creation of <i>other neutral grassland</i> An off-site habitat bank will be used to achieve the BNG and the biodiversity gain site register number is BGS-091024001 We are satisfied that the reasons for using a BNG habitat bank are appropriate for this application. The Biodiversity Gain Site Register has confirmed that the required units have been purchased. Planned habitat Planned habitat enhancements from this gain site that have been allocated to a development <table><tr><td>Local Planning Authority</td><td>East Lincs LPA</td></tr><tr><td>Planning reference number</td><td>23344083</td></tr><tr><td>Project name</td><td>BM20980 - Hopedale and Campton, Kent, SA13 9QZ</td></tr></table> Biodiversity value <table><tr><td>Habitat type</td><td>Value</td></tr><tr><td>Area</td><td>0.02</td></tr></table><table><tr><th>Area</th><th>Condition</th><th>Area in hectares (ha)</th></tr><tr><td>Grassland - Other neutral grassland</td><td>Good</td><td>0.007</td></tr><tr><td>Total</td><td></td><td>0.0</td></tr></table>	Local Planning Authority	East Lincs LPA	Planning reference number	23344083	Project name	BM20980 - Hopedale and Campton, Kent, SA13 9QZ	Habitat type	Value	Area	0.02	Area	Condition	Area in hectares (ha)	Grassland - Other neutral grassland	Good	0.007	Total		0.0
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Evidence that any biodiversity credits specified in the plan have been purchased.	N/A	
Name and address of the person completing the Plan, and (if different) the person submitting the Plan.	Yes	
A description of the development and planning permission reference number (to which the Plan relates).	Yes	
A description of arrangements for maintenance and monitoring of habitat enhancement to which paragraph 9(3) of Schedule 7A to the 1990 Act applies (habitat enhancement which must be maintained for at least 30 years after the development is completed).	N/A	As the off-site provision is proposed to be through a habitat bank provider, the gain site reference number is considered sufficient evidence that appropriate management will be implemented for the relevant habitats.



Officer's Analysis

Bat Mitigation

Condition 4

4. *Prior to works commencing within the site an updated bat mitigation strategy must be submitted to the LPA for written approval. The plan must include the following:*

- *Updated bat emergence surveys (if required)*
- *Overview of mitigation required*
- *Detailed methodology to implement the mitigation.*
- *Plans demonstrating that the bat mitigation will be incorporated into the building.*
- *Details of any monitoring required.*

The plan must be implemented as approved.

Reason: *In order to ensure the survival and protection of important species and those protected by legislation that could be affected by the development, in accordance with Local Plan: Core Strategy Policy CS12 and paragraph 187 of the National Planning Policy Framework, (NPPF) 2024 which seeks the protection of priority species.*

The following information has been submitted to discharge condition 4.

Planning Application Form received 13th August 2025;

Revised Bat Emergence and Re-Entry Surveys (BERS) – received 22nd September 2025;

Bat Mitigation Plan received 13th August 2025;

Drawing No. 1218_A_58 - Roofspace Analysis for Brown Long Eared Bats received 1st October 2025.

The submitted bat mitigation strategy has detailed that the building structure and materials do not allow for a bat loft to be incorporated in the build, however there is space within the roof to provide opportunities for roosting bats and it is recommended that access points and bat boxes are incorporated into the loft space.

The proposed mitigation of 3 integrated bat boxes and at least 1 bat box erected on to the trees are sufficient to discharge Condition 4.

An informative will be added to any forthcoming decision notice.

It is considered that that the wording of Condition 4 has been addressed in its entirety and can be discharged and no further information is required.

Biodiversity Net Gain

Condition 5

5. *Prior to the commencement of works, a biodiversity gain plan, a habitat management and monitoring plan shall be submitted to and approved, in writing, by the Local Planning Authority. The plan must detail how any on site habitat creation and enhancement is managed and monitored in the long term. The plan must be implemented as approved.*

Reason - *To ensure an acceptable standard of development upon completion through provision and long term management of soft landscaping and to enhance local provisions for wildlife and biodiversity to mitigate habitat lost by development, in accordance with adopted Gravesham Local Plan Core Strategy Policies CS12 and CS19.*

The following information has been submitted to discharge condition 5.

Planning Application Form received 13th August 2025;
BNG Metric received 13th August 2025; and
Biodiversity Gain Plan received 13th August 2025.

The submitted Biodiversity Gain Plan and Statutory Metric provide sufficient information to satisfy the wording of Condition 5. Off-site BNG has been achieved through the purchase of 0.02 units at an off-site habitat bank site which is satisfactory and therefore the Habitat Management Plan is not required for the discharge of condition 5.

It is considered that that the wording of Condition 5 has been addressed in its entirety and can be discharged and no further information is required.

Conclusion

It is considered that the submitted details are acceptable to address the wording of Conditions 4 and 5 of planning approval 20241003.

Recommendation

ADET - Approval of Details

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Ms Amanda Cue	Team Leader:	Richard Hart
Signed:	A Cue	Signed:	R Hart
Dated:	14 th October 2025	Dated:	14 th October 2025