



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher

FROM: Jessica Holdway

DATE: 20 August 2026

SUBJECT: UPDATED Woodside, Shorne; 20251086

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 – SUFFICIENT INFORMATION PROVIDED

We have reviewed the additional information submitted for this application and advise that **sufficient ecological information** has been provided for determination. Recommended **condition and informative** wording are provided below.

BAT ROOST CONFIRMED

Emergence surveys have confirmed the presence of a Common Pipistrelle day roost within the building (B1), and a mitigation strategy has been proposed within the submitted Bat Emergence and Re-Entry Survey (Arbtech Consulting, August 2026). The proposed alteration of the existing building will result in the loss of the confirmed roost

Bats/their roosts are fully protected from disturbance and harm through the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Some species of bat (including Bechstein's, noctule, soprano pipistrelle, brown long-eared) are also listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as Species of Principal Importance

for conservation. Local planning authorities must have regard for the conservation of Section 41 species and all bat species as part of their planning decisions.

The applicant must therefore apply for a mitigation licence from Natural England for works to commence. This means that they must either:

- complete an application form for a bat mitigation licence (A13) providing a method statement and work schedule, all of which should be submitted to Natural England, or
- find an accredited “Bat Earned Recognition” consultant who can provide a quality-assured site registration with a quicker determination period.

At this stage, the local planning authority must have enough information prior to determination to be confident that a Natural England mitigation licence will be issued.

We have reviewed the mitigation strategy, and it has detailed the following will be included:

- The installation of one bat box per species prior to works commencing, in an undisturbed location, positioned 3-5m above ground in a South or South-westerly direction with a clear flight path;
- The provision of a toolbox talk to contractors by the named ecologist prior to the start of works;
- A pre-commencement inspection of any roost features by the named ecologist;
- Any bats found will be moved by hand to the bat box by the named ecologist.

We advise that we are satisfied that sufficient mitigation has been proposed to maintain the favourable conservation status of the bats.

In accordance with the February 2020 Natural England explanatory note for local planning authorities on Clause 9.3 and Annex D6.1 of BS42020:2013, planning conditions and European Protected Species licences, to help ensure the full implementation of the submitted mitigation/compensation strategy and the applicant's obtention of a mitigation licence from Natural England in advance of works, if planning permission is granted, we advise the condition below is included:

Suggested Condition Wording:

The development shall be completed in strict accordance with the details of bat mitigation strategy, enhancement measures and features specified within the following documents and drawings as submitted with the planning application, unless modified by a relevant European Protected Species Licence issued by Natural England:

- *Page 10, Bat Emergence and Re-Entry Survey (Arbtech Consulting, August 2026)*

All the biodiversity mitigation measures shall be implemented in full accordance with the specified timescales in the aforementioned documents and drawings, or as modified by the relevant licence. All enhancement measures shall be in place prior to first occupation, and all the biodiversity mitigation and enhancement features shall thereafter be permanently retained and maintained for the stated purpose of biodiversity conservation.

If the licensable works have not been started within two years of the date of the emergence surveys, if deemed necessary by a suitably qualified ecologist, updated surveys and an updated mitigation and compensation strategy shall be completed and

submitted for approval in writing by the local planning authority prior to commencement of any works including site clearance.

SENSITIVE LIGHTING

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 hedgerows. 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 2026.

Therefore, to mitigate against potential adverse effects on biodiversity, the Bat Conservation Trust/Institute of Lighting Professional's '*Guidance Note 8 Bats and Artificial Lighting at Night*' (or subsequent updates) should be consulted in the lighting design of the development.

As recommended in the Bat Emergence and Re-Entry Survey (Arbtech Consulting, August 2026), we advise that the incorporation of sensitive lighting design for biodiversity is submitted to the local planning authority and secured via an attached condition with any planning permission.

Suggested Condition Wording:

Prior to occupation, a lighting design plan for biodiversity shall be submitted to, and approved in writing by, the local planning authority. The plan shall show the type and locations of external lighting, as well as the expected light spill in lux levels, to demonstrate that areas to be lit shall not adversely impact biodiversity. All external lighting shall be installed in accordance with the specifications and locations set out in the approved plan and shall be maintained thereafter.

BREEDING BIRDS

All wild bird species, their eggs and nests are protected by law under the Wildlife and Countryside Act 1981 (as amended). As there is potential for nesting birds to be found on site, the following informative is recommended.

Suggested Informative Wording:

All wild birds and their nests are protected from harm under Section 1 of the Wildlife and Countryside Act 1981. As such, any works which may result in impacts to nesting birds should be conducted outside of the core nesting season which is March through August (inclusive) or under ecological supervision. A suitable exclusion zone should be established around any active bird nest in the event one is discovered during works; this exclusion zone should be maintained until all nesting birds have fledged and the nest is unoccupied.

ECOLOGICAL ENHANCEMENTS

Policy N2 (NPPF 2026) states To contribute positively to the natural environment, and support nature's recovery, development proposals should: *Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use or would make them ineffective.*

As stated in the Bat Emergence and Re-Entry Survey, the creation of additional habitat for bats is recommended. This should be outlined within a Biodiversity Enhancement Plan and include:

- The installation of two integrated bat boxes onsite, positioned 3-5m above ground level, facing in a South or South-westerly direction, with a clear flight path and away from and unlit by artificial light.

We also suggest the following enhancements:

- The provision of suitably placed bird boxes to be either integrated into the new structure, and/or located on an existing tree onsite;
- The provision of bee bricks and/or the provision of log piles/artificial refugia for reptiles and amphibians;

Suggested Condition Wording:

Within three months of works commencing, a detailed plan showing how the development shall enhance and maintain biodiversity shall be submitted to, and approved in writing by, the local planning authority. This will include the suggested enhancement measures as detailed in the submitted Bat Emergence and Re-Entry Survey (Arbtech Consulting, August 2026), as well as the provision of bird boxes, bee bricks and log piles/artificial refugia. The approved measures shall be implemented and retained thereafter.

BIODIVERSITY NET GAIN: HOUSEHOLDER EXEMPTION

We consider this application exempt from statutory BNG because it is a householder application as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Jessica Holdway
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Bat Emergence and Re-Entry Survey (Arbtech Consulting, August 2026)
- Proposed Plans and Elevations (offset architects, March 2025)
- Existing House and Garage Plans and Elevations (offset architects, November 2024)
- Proposed Site Plan (offset architects, October 2025)