



ECOLOGICAL ADVICE SERVICE

TO: Alison Webster

FROM: Helen Forster

DATE: 24 December 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 an excel version of the Excel Metric has not been uploaded on to the portal or provided to KCC EAS directly. 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 previously advised that a plan demonstrating that a replacement roost will be incorporated in to the buildings must be provide. Additional information has been provided demonstrating that integrated features can be incorporated in to the buildings. We

highlight that the replacement features are not located in the same area where the roosts will be lost however as the principle has been demonstrated we are satisfied that the exact location can be agreed within the detailed mitigation strategy.

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 GBC can be satisfied that the favourable conservation status of bats can be maintained. If planning permission is granted we advise that there will be a requirement for a detailed mitigation strategy to be submitted as a condition of planning permission.

We can provide suggested condition wording once the additional metric information has been provided.

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