



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher
FROM: Elizabeth Fagg
DATE: 20 June 2025
SUBJECT: 20250481 Willow Platt, Rochester

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

We have reviewed the information submitted by the applicant and advise that sufficient **ecological/biodiversity net gain** information has been provided for determination. Recommended **condition/informative** wording is provided below.

The application states this is a self and custom build proposal and therefore is exempt from BNG. The LPA need to be satisfied this application meets this exemption.

PROTECTED SPECIES

A preliminary ecological appraisal and bat roost assessment has been completed by an ecologist, Arbtech May 25. The site has already been subject to demolition works and the remaining buildings that were assessed have shown a negligible suitability for the presence of bats. As suitable trees and habitat are present for foraging and commuting bats within the site, a sensitive lighting strategy has been suggested in line with Bat Conservation Trust website noting a redundant hyperlink. We highlight that these need to follow the following Bat Conservation Trust/Institute of Lighting Professional's 'Guidance

*Note 08/23 Bats and Artificial Lighting at Night*¹. Some suitable requirements have been proposed on the proposed site plan. Lighting is discussed further below.

The ecology report states that there will be minimal vegetation removal and that the trees will be retained. Some vegetation within the site has been identified as suitable breeding bird habitat and as some will be impacted we recommend that any works to vegetation are conducted outside the breeding bird season (1st March to 31st Aug) to avoid risk of impacts or if within the breeding bird season, a survey by a suitably qualified person needs to be conducted to confirm absence, prior to commencing works. This should be included in the precautionary works method statement, detailed further below.

Some small areas of modified grassland are to be lost and were identified as potentially suitable habitat for a low number of reptiles. As this is connected to more optimal habitat, the ecologist has suggested a precautionary approach is used and the grass is maintained at a low sward of 5cm to discourage reptiles. We would have normally expected a reptile survey but have reviewed the photographs provided and with considering the works that have already been completed, we agree with the precautionary approach proposed. We have also suggested a directional cut within the precautionary measures, to ensure the vegetational removal pushes any potential reptiles found present to optimal habitat for shelter.

The site is within a green zone for great crested newts (GCN), indicating a lower risk of presence, and 2 ponds are located within 500m, with the nearest being within approximately 215m. A Natural England Rapid Risk Assessment was conducted for GCN and the chance of an offence is highly unlikely. From the photographs we can see that the garden area is managed and the precautionary approach suggested is acceptable. These measures are to be included in the precautionary works method statement, detailed further below.

No evidence of badgers was found on the site visit and it is stated that no loss of habitat suitable for dormice will occur, and the development will be situated approximately 100m from any suitable habitat. Precautionary mitigation has been proposed that considers any presence of mobile species such as badgers and hedgehogs on the site.

As this is a replacement dwelling, we consider that there will be no change to any impacts on designated areas.

PRECAUTIONARY WORKS METHOD STATEMENT

We understand that the site has already been subject to some demolition and rubble is shown in the photographs. The site also has a good number of existing trees and vegetation which will need protection during the clearance and construction. Therefore, to protect from limited adverse impacts to protected species during clearance and

¹ [‘Bats and Artificial Lighting at Night’ ILP Guidance Note update released - News - Bat Conservation Trust](#)

construction we recommend a precautionary work statement is a condition with the suggested wording below.

Suggested condition wording:

From commencement of works (including site clearance), to avoid impacts to protected and priority species, the following precautionary mitigation should be implemented:

- 1. Any hedgerow and trees to be retained, including its roots, will be protected from damage;*
- 2. Any required clearance of tall/dense vegetation with potential to support reptiles or amphibians should be undertaken in two stages, with a first cut to 150mm, in the direction towards optimal habitat for shelter, followed by a second cut several days later to ground level;*
- 3. Grass will be maintained to a low sward of 5cm prior to and during the construction;*
- 4. Brash, rubble, soil and log piles to be relocated will be dismantled by hand. Where these are suitable for hibernating reptiles/amphibian/hedgehog, removal will be conducted outside of the hibernation period (November – February);*
- 5. Backfilling of trenches and other excavations will be undertaken before nightfall, or a ramp will be left to allow any animals to easily exit;*
- 6. All excavations and trenches will be checked each morning throughout the construction period and prior to infilling;*
- 7. All temporarily stored building materials (that might act as temporary resting places) will be isolated within hardstanding areas and raised off the ground, e.g. on pallets.*
- 8. Any work to vegetation/structures that may provide suitable bird nesting habitats should be carried out outside of the bird breeding season (1st March to 31st August inclusive) to avoid destroying or damaging bird nests in use or being built. If within the breeding bird season a survey by a suitably qualified person needs to be conducted to confirm absence, prior to commencing works.*
- 9. If at any time a protected species is discovered within the works area all works must stop while a suitably qualified ecologist and/or Natural England are consulted. Works will not resume until any required surveys and/or mitigation are completed.*

LIGHTING

Nocturnal animals (including bats) are likely to be using the site and surrounding area for foraging and commuting and any lighting associated with the proposal may have a negative impact, especially any light spill to hedgerow boundaries and trees on the site. We note that the proposed plans have noted suitable information for a sensitive lighting strategy, with lighting positions shown, with requirements. We advise that a **condition** will be required to ensure the sensitive lighting strategy is implemented.

A sensitive lighting scheme will be implemented as detailed within in the Proposed plans and elevations, Synergy, Oct 24, in accordance with guidance in Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 08/23 Bats and Artificial Lighting at Night. No changes must be implemented unless agreed in writing with the LPA.

Reason: to minimise light spill and to protect adjacent habitats and wildlife from impacts from lighting.

BIODIVERSITY NET GAIN

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications² for development (unless exempt^{3,4}), must deliver at least a 10% biodiversity net gain (BNG). Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

This application states it is a self and custom build dwelling and therefore exempt from BNG.

ENHANCEMENTS

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for BNG, avoidance, mitigation and compensation. As such, we advise that an enhancement plan is provided and a condition wording is suggested below.

Within three months of works commencement, a detailed plan(s) showing how the development will enhance biodiversity, will be submitted to, and approved in writing by, the local planning authority. This will include the installation of durable bat and bird boxes, log piles, hibernacula, hedgehog homes and native species included in any planting. The approved measures will be implemented and retained thereafter.

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

Elizabeth Fagg
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Design and Access Statement
- Preliminary ecological appraisal and roost assessment, Arbtech, 1/5/25
- Existing plans and elevations, Synergy, Oct 24
- Proposed plans and elevations, Synergy, Oct 24

² All planning applications for major development (unless exempt) submitted on or after 12th February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2nd April 2024.

³ [Biodiversity net gain: exempt developments - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

⁴ [The Biodiversity Gain Requirements \(Exemptions\) Regulations 2024 \(legislation.gov.uk\)](https://legislation.gov.uk)