



ECOLOGICAL ADVICE SERVICE

TO: *Danielle Wilkins*

FROM: *Helen Forster*

DATE: *11 March 2024*

SUBJECT: *Hillside Farm, Stowting 23/1141/FH*

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 have reviewed the submitted information and we are satisfied that the submitted ecological information is sufficient to determine the planning application.

We are satisfied with the conclusions of the submitted surveys that the building has been confirmed as a common pipistrelle and long brown eared bat roost and at least 2 species of foraging bats were recorded during the survey. In addition we are of the view that there is suitable habitat within the site to support breeding birds.

Bats

The submitted ecological survey detailed the following: *One common pipistrelle was recorded emerging from Building B1. This building is therefore a confirmed bat roost, likely to be used by one male or non-breeding female bat. The roost is considered to be of importance at the local level. On completion of the surveys, the brown long-eared roost in Building B1 (evidenced by hundreds of droppings in the loft void) was defined as a subsidiary maternity roost and afforded county level importance.*

The mitigation required is the following:

The loss of the common pipistrelle day roost will be permanently replaced with a suitable crevice roost feature incorporated within the new roof proposed within the northern portion of the newly created building. The suitable crevice roost feature will be on the north-

western elevation to best replicate the roost being lost. The precise feature to be used will be confirmed at the licensing stage, but a suitable example for use on this building is the Heritage Clay Bat Access Tile sold by NHBS. • The loss of the brown long-eared bat subsidiary maternity roost will be permanently replaced with a loft void which will be created within the northern portion of the new building. **The loft void will measure L x 9.5m, W x 5.4m and H x 1.8m (to the apex)** and will include rough sawn timber beams for brown long eared bats to roost on. The roof will comprise of roof tiles on Bitumen 1F felt (no breathable membranes will be used) and four bat access tiles each with a cut in the felt below will be incorporated near the ridge, two on each roof elevation. This will allow access for brown long-eared bats to the void space. A loft hatch will be incorporated to allow for maintenance, but the loft will be kept free of stored items due to the restricted eaves height

The plans submitted with the planning application has confirmed that the proposed bat mitigation will be incorporated into the building.

If planning permission is granted we recommend that the ecological mitigation detailed within the submitted report must be implemented as detailed. We recommend the following wording:

Prior to and during construction works the bat mitigation detailed within the Bat Survey Report (David Archer Associates; July 2023) and the Biodiversity Strategy – Drawing 13 (Holloway; June 2023) must be implemented as detailed unless varied by a European Protected Species licence subsequently issued by Natural England. If works have not commenced within 24months of the date of the bat survey report a review and update of the bat mitigation strategy must be carried out and submitted to the LPA for written approval.

Lighting

Lighting can have a negative impact on bats (and other nocturnal species) and therefore any lighting must be designed to minimise light spill.

We recommend that if planning permission is granted the **lighting condition** has the following requirements:

- Be designed following best practice guidance within Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 08/23 Bats and Artificial Lighting at Night'¹
- Downward facing and on motion sensors
- Does not impact the replacement bat roost

Breeding Birds

Due to suitable habitat being present to support breeding birds we recommend the following information is included if planning permission is granted:

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

The applicant is reminded that, under the Wildlife and Countryside Act 1981 (as amended), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this Act.

Habitats are present on and around the site that provide opportunities for breeding birds. Any work to vegetation/structures that may provide suitable 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 vegetation/structures need to be removed during the breeding season, mitigation measures need to be implemented. This includes examination by a suitably qualified and experienced ecologist immediately prior to starting work. If any nesting birds are found, works must cease until after the birds have finished nesting.

Ecological Enhancements

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 180 and 186 of the National Planning Policy Framework (NPPF) 2023, biodiversity should be maintained and enhanced through the planning system.

A Biodiversity Strategy (Drawing 12) has been submitted and it has confirmed the following enhancement measures will be implemented within the site:

- Native Species planting (including climbing plants and wildflower meadow)
- Native Hedgehog
- 1 bird box
- 1 Hedgehog box
- 1 log pile

We are satisfied that the proposed measures are appropriate and must be implemented within the completed development.

The document does also state a bat box will be erected but we highlight that this measure is required as part of the bat mitigation.

We recommend the following wording:

Prior to occupation the ecological enhancement measures Biodiversity Strategy – Drawing 12 (Holloway; June 2023) must be installed as detailed.

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:
Bat Survey Report; David Archer Associates; July 2023
Biodiversity Strategy – Drawing 12; Holloway; May 2023
Biodiversity Strategy – Drawing 13; Holloway; June 2023

