



ECOLOGICAL ADVICE SERVICE

TO: Laura Payne
FROM: Jonathan Lynch
DATE: 17 January 2024
SUBJECT: PA/2023/2232 / Glendale House, Ashford

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 information is required prior to determination of the planning application. We recommend that an updated preliminary ecological assessment (PEA) and bat survey is carried out as part of this application and submitted within an Ecological Impact Assessment (EclA).

We note that the submitted PEA is dated September 2021 and is therefore over two years old. The report states:

"This report is valid for two years from the date of the survey visit. Should works be delayed to later than one year after the survey then a further update survey of the site would be required as habitats change over time, along with their potential to support protected species."

Additionally, CIEEM's current advice on the lifespan of ecological reports and surveys states that, if survey data are between 18 months and 3 years old, then:

"[a] professional ecologist will need to undertake a site visit and may also need to update desk study information (effectively updating the Preliminary Ecological Appraisal) and then review the validity of the report, based on the factors listed below. Some or all of the other

ecological surveys may need to be updated. The professional ecologist will need to issue a clear statement, with appropriate justification, on:

- *The validity of the report;*
- *Which, if any, of the surveys need to be updated; and*
- *The appropriate scope, timing and methods for the update survey(s)."*

When we previously commented on application 21/01374/AS, we raised concerns over the validity of the bat emergence surveys conducted as part of this application (on the 29th and 30th of September 2021) as they were conducted outside of optimum surveying period for bat roosts. The same surveys have been re-submitted.

The applicant should be advised of the Bat Conservation Trust's *Good Practice Guidelines* which state that the optimum period for conducting bat emergence surveys is May-August inclusive, during which two separate dusk emergence visits ought to be carried out at least three weeks apart (preferably more). We strongly suggest that a bat emergence survey is repeated in line with this advice, as the site likely has continued potential to support bats (as buildings B1 and B2 were considered to have "moderate suitability" for roosting bats in 2021).

We recommend that all the ecological information is submitted as an EclA.

The EclA will include the following:

- Details of the impacts of development proposals on the ecological baseline established via a Preliminary Ecological Appraisal (PEA) and any additional surveys undertaken;
- Details of any necessary and achievable ecological mitigation and/or compensation measures;
- Details of ecological enhancement measures, and;
- Provision of sufficient information to determine whether the project accords with relevant nature conservation policies and legislation.

To ensure that the planning determination is adequately informed in respect of all potential ecological impacts, we advise that the EclA is sought prior to determination of the planning application. This is in alignment with paragraph 99 of ODPM 06/2005 which states "*it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision*".

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

Jonathan Lynch
Biodiversity Officer

This response was submitted following consideration of the following documents:

- *Bat Emergence Survey Report* (Fellgrove, 09/2021)
- *Block Plan, Existing & Proposed - 20-52-32* (Prime Folio, 02/2021)
- *Location Plan - 20-52-21* (Prime Folio, 11/2020)
- *Planning, Design & Access Statement* (DHA Planning, 11/2023)
- *Preliminary Ecological Appraisal Survey Report* (Fellgrove, 09/2021)