

ECOLOGICAL ADVICE SERVICE

TO:

FROM: Helen Forster

DATE: 10 September 2025

SUBJECT: Sevington Inland Border Facility, Sevington OTH/2025/1437

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 the following comments do not consider potential impacts associated with Stodmarsh SPA, SAC, SSSI and Ramsar.

This application is for the following: Retention of the existing buildings, Goods Vehicle parking spaces, entry lanes, refrigerated semi-trailers, staff car parking spaces, access, site infrastructure, utilities, hardstanding, landscaping and ancillary facilities and associated works; and ongoing use of the site for an Inland Border Facility and Border Control Post, operating 24 hours per day, seven days per week.

Therefore any ecological impacts associated with the construction have already occurred when the development was implemented.

The ecological surveys carried out between 2012 and 2020 prior to works commencing on site confirmed the following species were present within the site or the wider area

- Great Crested Newts
- At least 5 species of foraging bats with a number of bat roosts within the wider area.
- Outlier badger sett in 2020
- At least 47 species of Birds recorded during breeding bird survey
- Dormouse within the boundary;

- 3 species of reptiles;
- Water Voles within the stream 125m to the north of the site; and
- Suitable habitat for Invertebrates within the site/wider area including two nationally scarce species were recorded

Ecological mitigation was implemented prior to works commencing on site (including a reptile translocation) and areas of the site continue to provide suitable habitat for the species previously recorded on site. However on going monitoring and updated surveys in 2024 detailed there was no evidence of badgers or dormouse being present within the site.

As no construction works are proposed we are satisfied that no ecological mitigation for is required however the on going surveys have demonstrated that there has a been a decline in nocturnal species which is likely due to the lighting within the site. We note that the lighting assessment has made a number of recommendations to minimise the lighting impacts from the proposal and we are supportive of these measures. We advise that if planning permission is granted a lighting plan must be submitted as a **condition** of planning permission to confirm the new lighting regime.

The submitted information has detailed that the Landscape Monitoring and Management Plan and the Landscape and Ecological Management Plan has been updated and will include additional measures including:

- Bat Activity surveys and bat box checks
- Breeding bird surveys
- Habitat surveys
- GCN surveys
- Reptile surveys
- Dormouse surveys
- Water vole assessment of water bodies on site.

We have reviewed the submitted LMMP or LEMP and advise that we are satisfied with the proposed management but highlight that changes may be required following the results of the on going surveys.

We note that habitat enhancement is proposed of the land within the blue line habitat to allow the proposal to achieve a BNG which should increase opportunities for biodiversity or address any issues identified during the monitoring surveys. These measures have not been implemented yet and therefore must be implemented within the first planting season following planning permission being granted.

Biodiversity Net Gain

We have reviewed the BNG assessment has detailed that due to the proposed habitat creation in the blueline boundary a BNG of 65% for habitats and 58% for hedgerows can be achieved.

We highlight that a condition assessment of the existing habitat on site has not been carried out so it is not clear if the habitats on site have already achieved the anticipated condition detailed in table 6 of the BNG assessment. In addition the current google earth images have not demonstrated that the habitat creation in the blue line boundary have been implemented.

Therefore currently the proposed BNG has not been achieved however we are satisfied if the habitat creation and habitat management is implemented within the site the proposal can achieve a BNG of over 10%.

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:

- Environmental Statement; Chapter 11
- Soft Landscape Works Maintenance And Management Proposals 10 years; BCA Design;
- Landscape and Ecology Specification; November 2020
- External Lighting Assessment; Waterman; May 2025
- Biodiversity Net Gain Report; Waterma; March 2025