



ECOLOGICAL ADVICE SERVICE

TO: Adeoye Lawal
FROM: Emma England
DATE: 16 April 2026
SUBJECT: 20251233 / Land at Rose Farm, Istead Rise

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: ADDITIONAL INFORMATION REQUIRED

We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. The following information is required prior to determination:

- Update of the biodiversity net gain calculation tool to show proposed habitat retention (including based on the tree protection plan), and indicative post-development on-site habitats based on the illustrative landscape masterplan and parameter plan;
- Justification for the removal of a veteran tree from the site and lack of suitable buffer zones for retained veteran trees;
- Justification for the removal of trees identified to have ecological value (Former Elmlands Shaw Trees);
- A full Ecological Impact Assessment¹ providing adequate survey information in line with relevant professional standards, and outline avoidance, mitigation, compensation and enhancement measures in line with the mitigation hierarchy (including:

¹ [Guidelines for Ecological Impact Assessment \(EcIA\) | CIEEM](#)

- an outline lighting strategy;
- further assessment of the bat assemblage in accordance with current guidelines;
- further information regarding any important bat foraging and commuting routes that need to be protected from habitat loss and/or the negative effects of increased lighting on-site;
- definition of 'bat pass';
- for the static detector surveys, number of bat passes presented per hour, per species;
- bat roost characterisation following on from further survey effort in line with standard professional practice² as appropriate;
- plans showing the locations of surveyors, infrared cameras and potential roost features for each emergence survey/ bespoke survey along with the walking methodology and route taken for the bespoke survey. Detailed reasoning and justification for not following standard professional guidelines for bat survey of structures needs to be provided;
- further survey information and any necessary avoidance, mitigation and compensation measures in relation to trees in line with current professional guidelines;
- An outline avoidance, mitigation, compensation and enhancement strategy for breeding birds.

We cannot see comments from a tree officer for this application, and we would recommend that the views of a tree officer are also sought.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications³ for development (unless exempt^{4,5}), must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development. Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

Having reviewed submitted information⁶, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development. We consider there is no local policy biodiversity net gain requirement above 10% for this development.

We have produced the following table to aid the local planning authority in ascertaining whether sufficient BNG information has been submitted:

² [Bat Survey Guidelines 23](#)

³ 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.

⁴ Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

⁵ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

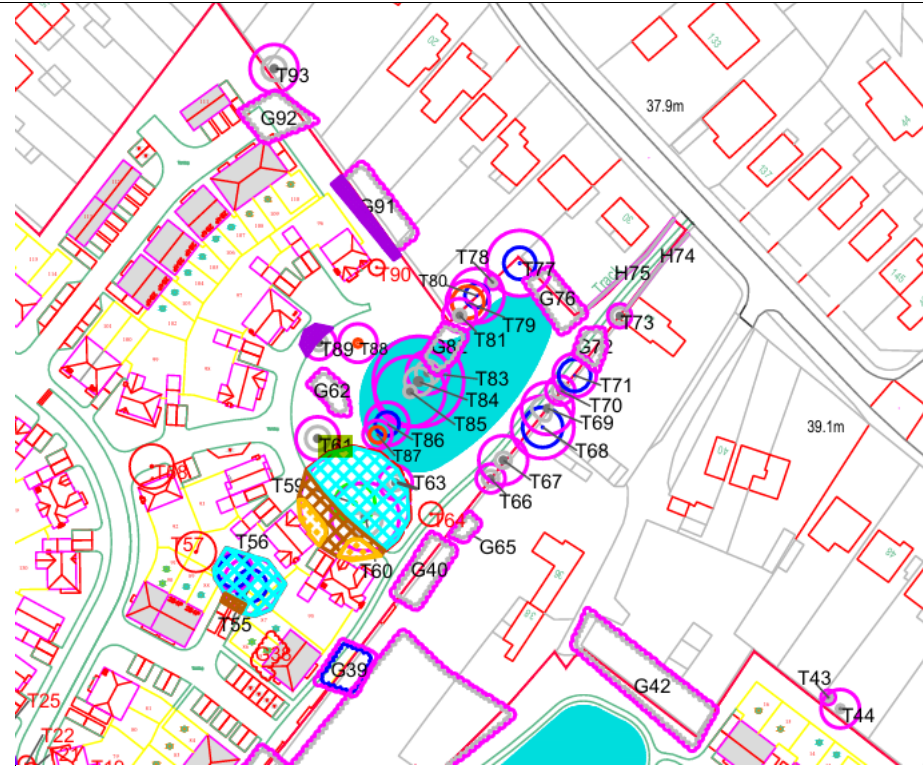
⁶ References to the biodiversity value of any habitat or habitat enhancement within this section of the advice note refer to the value as calculated in accordance with the biodiversity metric.

Table 1: To show whether the applicant has met the minimum validation requirements, and expected standards according to government standing advice

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	Yes	
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate).	Yes	Site visits were carried out by a suitably qualified ecologist on 18th March, 9th June, 2nd July, 12th July, 13th July and 6th October 2025. This is considered acceptable to inform the habitat baseline for this application given the site size, location and habitats reported. The date the biodiversity value was calculated has been given as 9th June 2025. The reason provided in the application is that this is the date the baseline survey was carried out. However, we note that botanical survey extended into October 2025. We therefore consider that the 'relevant date' should be taken to be no earlier than 6th October 2025. The biodiversity metric calculations were made 18th November 2025 and we suggest that this be made the 'relevant date' for this application when the Biodiversity Gain Plan is submitted for discharge should planning permission be granted for this application.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	Yes	We suggest that the 18 th November 2025 be used as the 'relevant date' for this application.
The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value.		The site is 9.6 hectares in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool (9.57 ha) closely matches the reported red line boundary site area as per the application form. We are content with the baseline habitat classifications. We highlight to Gravesham Borough Council that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28th November 2025. The LNRS was published after the 'relevant date'. As the LNRS was published after the relevant date, the 'pre-development' biodiversity value does not need to be updated. As the publication of the LNRS has occurred whilst the planning application is live, and as its publication could affect the post-development strategic significance score, the strategic significance scores in the biodiversity metric calculation tool for the post-

	development habitats will need to be reviewed in advance of the deemed condition discharge⁷. The habitat creation/enhancement strategic significance scoring will need to reflect the published LNRS. The strategic significance score can be determined through use of the Local Habitat Map, available here: Local Nature Recovery Strategy mapping portal Making Space For Nature Kent, with guidance on its use available here: How to use the online mapping tool Kent and Medway Local Nature Recovery Strategy. A guidance document on how to apply strategic significance is available here: The-role-of-Kent-Medways-Local-Nature-Recovery-Strategy-in-Biodiversity-Net-Gain-Strategic-Significance-.pdf. We note that although a landscape masterplan, parameter plan and arboricultural impact assessment is available, that the biodiversity net gain metric calculation tool has been submitted without information relating to habitat retention or creation. It is a legal requirement that the biodiversity gain hierarchy is considered. Sufficient information also needs to be provided with the planning application to understand how conditions should be applied should planning permission be granted. As a general note we point out that there is inconsistency in the tree numbering between reports. This should be reviewed and corrected so it is very clear which trees are being referred to in the reports. We note that three trees are classified as veteran fruit trees and irreplaceable habitat. These trees should be prioritised for retention. We note that the biodiversity net gain validation statement indicates that these trees: T61, T89 and T90 will be removed. However, whilst the arboricultural impact assessment lists T90 for removal, T61 and T89 appear to be being retained and lie within the open space identified within the parameter plan. We would recommend that a commitment be made at this stage regarding the retention of irreplaceable habitats that is reflected within the biodiversity net gain calculations. We would also recommend that robust justification be provided for why all the irreplaceable habitat on-site cannot be retained.
--	---

⁷ [LNRS and SS Multiplier Transition Guidance_2.pdf](#); [LNRS & Strategic Significance Multiplier Transition | Local Government Association](#)

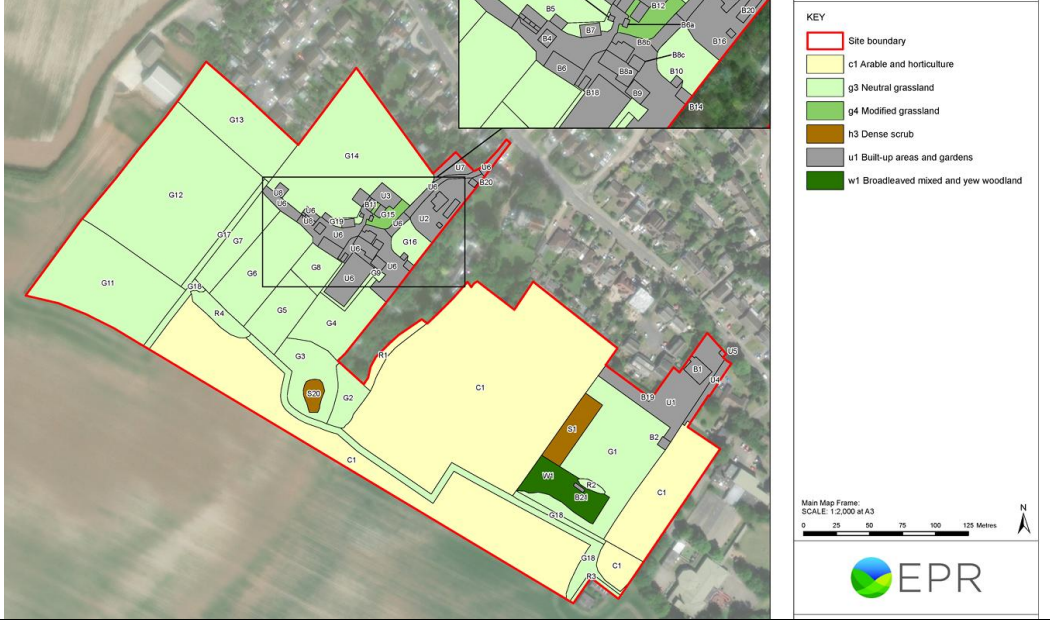


We remind Gravesham Borough Council that any loss of irreplaceable habitat is to be considered under the NPPF 2024, paragraph 193(c), which states: *“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”*.

We would recommend that retained irreplaceable habitat include a suitable buffer. The buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. This will create a minimum root protection area. We note that at present, at least T89 does not appear to have an adequate root protection area. The root protection area needs to be in place during and post-construction (e.g., through the implementation of post and rail fencing).

We also note that the following trees have been identified within the ecological information to be of ecological value: T17, T29, T32, T33, T34, T36 and G16 (Former

		Elmlands Shaw Trees) and T59. However, we also note that some of these trees have been identified for removal (G16, T17, T19, T21, T22, T18, T25) and we request further information regarding why these ecologically valuable trees cannot be retained within designs. We further point out that the developer needs to first prioritise on-site biodiversity net gain before considering off-site options. We note that there is a considerable area of open space proposed on the parameter plan, and that the illustrative landscape masterplan indicates areas of retained trees and hedgerows, proposed trees and woodland, proposed traditional and community orchard, scrub, wildflower meadow, and ponds. However, these habitats have not been represented within the metric to show whether an on-site biodiversity net gain is achievable. Whilst we understand that full details of how the proposals will deliver biodiversity gains are not strictly required until submission of the pre-commencement Biodiversity Gain Plan, it is advisable to obtain an indication of whether a biodiversity net gain is achievable on-site prior to determination as, it gives an indication of how the biodiversity gain hierarchy will be applied, and if granted consent, the project cannot commence until this information has been submitted to and approved by the local planning authority. This information will also provide sufficient indication as to how conditions need to be applied should planning permission be granted for this application. The government's standing advice on BNG states (under paragraph 002 Reference ID: 74-002-20240214): "[BNG] is not just a post-permission matter. To ensure the biodiversity gain objective is met and the condition can be discharged successfully, it is important biodiversity net gain is considered throughout the planning process."
A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('<u>degradation</u>'), and where they have: • a statement to the effect that these activities have been carried out; • the date immediately before these activities were carried out; • the pre-development biodiversity value of the onsite habitat on this date; • the completed metric calculation tool showing the calculations, and • any available supporting evidence of this.	Yes	None reported or visible on aerial imagery (Google Earth Pro, accessed April 2026)
A description of any <u>irreplaceable habitat</u> (as set out in <u>column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024</u>)	Yes	Any irreplaceable habitats that are removed will need appropriate bespoke compensation. However, the irreplaceable habitats should be prioritised for retention

on the land to which the application relates, that exists on the date of application, (or an earlier date).	before considering compensation options. Where compensation is going to be required the need for the removal of the habitats will need to be clearly and robustly justified. No such justification has been provided in the submission material.
Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).	Yes Available within the Outline Ecological Impact Assessment.  The map displays a site boundary in red, enclosing various habitat types color-coded according to the key: yellow for arable/horticulture (C1), light green for neutral grassland (G3), medium green for modified grassland (G4), brown for dense scrub (h3), grey for built-up areas (u1), and dark green for broadleaved mixed and yew woodland (w1). Numerous habitat patches are labeled with codes like G11, G12, G13, G14, G15, G16, G17, G18, G19, G20, G21, G22, G23, G24, G25, G26, G27, G28, G29, G30, G31, G32, G33, G34, G35, G36, G37, G38, G39, G40, G41, G42, G43, G44, G45, G46, G47, G48, G49, G50, G51, G52, G53, G54, G55, G56, G57, G58, G59, G60, G61, G62, G63, G64, G65, G66, G67, G68, G69, G70, G71, G72, G73, G74, G75, G76, G77, G78, G79, G80, G81, G82, G83, G84, G85, G86, G87, G88, G89, G90, G91, G92, G93, G94, G95, G96, G97, G98, G99, G100, G101, G102, G103, G104, G105, G106, G107, G108, G109, G110, G111, G112, G113, G114, G115, G116, G117, G118, G119, G120, G121, G122, G123, G124, G125, G126, G127, G128, G129, G130, G131, G132, G133, G134, G135, G136, G137, G138, G139, G140, G141, G142, G143, G144, G145, G146, G147, G148, G149, G150, G151, G152, G153, G154, G155, G156, G157, G158, G159, G160, G161, G162, G163, G164, G165, G166, G167, G168, G169, G170, G171, G172, G173, G174, G175, G176, G177, G178, G179, G180, G181, G182, G183, G184, G185, G186, G187, G188, G189, G190, G191, G192, G193, G194, G195, G196, G197, G198, G199, G200, G201, G202, G203, G204, G205, G206, G207, G208, G209, G210, G211, G212, G213, G214, G215, G216, G217, G218, G219, G220, G221, G222, G223, G224, G225, G226, G227, G228, G229, G230, G231, G232, G233, G234, G235, G236, G237, G238, G239, G240, G241, G242, G243, G244, G245, G246, G247, G248, G249, G250, G251, G252, G253, G254, G255, G256, G257, G258, G259, G260, G261, G262, G263, G264, G265, G266, G267, G268, G269, G270, G271, G272, G273, G274, G275, G276, G277, G278, G279, G280, G281, G282, G283, G284, G285, G286, G287, G288, G289, G290, G291, G292, G293, G294, G295, G296, G297, G298, G299, G300, G301, G302, G303, G304, G305, G306, G307, G308, G309, G310, G311, G312, G313, G314, G315, G316, G317, G318, G319, G320, G321, G322, G323, G324, G325, G326, G327, G328, G329, G330, G331, G332, G333, G334, G335, G336, G337, G338, G339, G340, G341, G342, G343, G344, G345, G346, G347, G348, G349, G350, G351, G352, G353, G354, G355, G356, G357, G358, G359, G360, G361, G362, G363, G364, G365, G366, G367, G368, G369, G370, G371, G372, G373, G374, G375, G376, G377, G378, G379, G380, G381, G382, G383, G384, G385, G386, G387, G388, G389, G390, G391, G392, G393, G394, G395, G396, G397, G398, G399, G400, G401, G402, G403, G404, G405, G406, G407, G408, G409, G410, G411, G412, G413, G414, G415, G416, G417, G418, G419, G420, G421, G422, G423, G424, G425, G426, G427, G428, G429, G430, G431, G432, G433, G434, G435, G436, G437, G438, G439, G440, G441, G442, G443, G444, G445, G446, G447, G448, G449, G450, G451, G452, G453, G454, G455, G456, G457, G458, G459, G460, G461, G462, G463, G464, G465, G466, G467, G468, G469, G470, G471, G472, G473, G474, G475, G476, G477, G478, G479, G480, G481, G482, G483, G484, G485, G486, G487, G488, G489, G490, G491, G492, G493, G494, G495, G496, G497, G498, G499, G500, G501, G502, G503, G504, G505, G506, G507, G508, G509, G510, G511, G512, G513, G514, G515, G516, G517, G518, G519, G520, G521, G522, G523, G524, G525, G526, G527, G528, G529, G530, G531, G532, G533, G534, G535, G536, G537, G538, G539, G540, G541, G542, G543, G544, G545, G546, G547, G548, G549, G550, G551, G552, G553, G554, G555, G556, G557, G558, G559, G560, G561, G562, G563, G564, G565, G566, G567, G568, G569, G570, G571, G572, G573, G574, G575, G576, G577, G578, G579, G580, G581, G582, G583, G584, G585, G586, G587, G588, G589, G590, G591, G592, G593, G594, G595, G596, G597, G598, G599, G600, G601, G602, G603, G604, G605, G606, G607, G608, G609, G610, G611, G612, G613, G614, G615, G616, G617, G618, G619, G620, G621, G622, G623, G624, G625, G626, G627, G628, G629, G630, G631, G632, G633, G634, G635, G636, G637, G638, G639, G640, G641, G642, G643, G644, G645, G646, G647, G648, G649, G650, G651, G652, G653, G654, G655, G656, G657, G658, G659, G660, G661, G662, G663, G664, G665, G666, G667, G668, G669, G670, G671, G672, G673, G674, G675, G676, G677, G678, G679, G680, G681, G682, G683, G684, G685, G686, G687, G688, G689, G690, G691, G692, G693, G694, G695, G696, G697, G698, G699, G700, G701, G702, G703, G704, G705, G706, G707, G708, G709, G710, G711, G712, G713, G714, G715, G716, G717, G718, G719, G720, G721, G722, G723, G724, G725, G726, G727, G728, G729, G730, G731, G732, G733, G734, G735, G736, G737, G738, G739, G740, G741, G742, G743, G744, G745, G746, G747, G748, G749, G750, G751, G752, G753, G754, G755, G756, G757, G758, G759, G760, G761, G762, G763, G764, G765, G766, G767, G768, G769, G770, G771, G772, G773, G774, G775, G776, G777, G778, G779, G780, G781, G782, G783, G784, G785, G786, G787, G788, G789, G790, G791, G792, G793, G794, G795, G796, G797, G798, G799, G800, G801, G802, G803, G804, G805, G806, G807, G808, G809, G810, G811, G812, G813, G814, G815, G816, G817, G818, G819, G820, G821, G822, G823, G824, G825, G826, G827, G828, G829, G830, G831, G832, G833, G834, G835, G836, G837, G838, G839, G840, G841, G842, G843, G844, G845, G846, G847, G848, G849, G850, G851, G852, G853, G854, G855, G856, G857, G858, G859, G860, G861, G862, G863, G864, G865, G866, G867, G868, G869, G870, G871, G872, G873, G874, G875, G876, G877, G878, G879, G880, G881, G882, G883, G884, G885, G886, G887, G888, G889, G890, G891, G892, G893, G894, G895, G896, G897, G898, G899, G900, G901, G902, G903, G904, G905, G906, G907, G908, G909, G910, G911, G912, G913, G914, G915, G916, G917, G918, G919, G920, G921, G922, G923, G924, G925, G926, G927, G928, G929, G930, G931, G932, G933, G934, G935, G936, G937, G938, G939, G940, G941, G942, G943, G944, G945, G946, G947, G948, G949, G950, G951, G952, G953, G954, G955, G956, G957, G958, G959, G960, G961, G962, G963, G964, G965, G966, G967, G968, G969, G970, G971, G972, G973, G974, G975, G976, G977, G978, G979, G980, G981, G982, G983, G984, G985, G986, G987, G988, G989, G990, G991, G992, G993, G994, G995, G996, G997, G998, G999, G1000, G1001, G1002, G1003, G1004, G1005, G1006, G1007, G1008, G1009, G1010, G1011, G1012, G1013, G1014, G1015, G1016, G1017, G1018, G1019, G1020, G1021, G1022, G1023, G1024, G1025, G1026, G1027, G1028, G1029, G1030, G1031, G1032, G1033, G1034, G1035, G1036, G1037, G1038, G1039, G1040, G1041, G1042, G1043, G1044, G1045, G1046, G1047, G1048, G1049, G1050, G1051, G1052, G1053, G1054, G1055, G1056, G1057, G1058, G1059, G1060, G1061, G1062, G1063, G1064, G1065, G1066, G1067, G1068, G1069, G1070, G1071, G1072, G1073, G1074, G1075, G1076, G1077, G1078, G1079, G1080, G1081, G1082, G1083, G1084, G1085, G1086, G1087, G1088, G1089, G1090, G1091, G1092, G1093, G1094, G1095, G1096, G1097, G1098, G1099, G1100, G1101, G1102, G1103, G1104, G1105, G1106, G1107, G1108, G1109, G1110, G1111, G1112, G1113, G1114, G1115, G1116, G1117, G1118, G1119, G1120, G1121, G1122, G1123, G1124, G1125, G1126, G1127, G1128, G1129, G1130, G1131, G1132, G1133, G1134, G1135, G1136, G1137, G1138, G1139, G1140, G1141, G1142, G1143, G1144, G1145, G1146, G1147, G1148, G1149, G1150, G1151, G1152, G1153, G1154, G1155, G1156, G1157, G1158, G1159, G1160, G1161, G1162, G1163, G1164, G1165, G1166, G1167, G1168, G1169, G1170, G1171, G1172, G1173, G1174, G1175, G1176, G1177, G1178, G1179, G1180, G1181, G1182, G1183, G1184, G1185, G1186, G1187, G1188, G1189, G1190, G1191, G1192, G1193, G1194, G1195, G1196, G1197, G1198, G1199, G1200, G1201, G1202, G1203, G1204, G1205, G1206, G1207, G1208, G1209, G1210, G1211, G1212, G1213, G1214, G1215, G1216, G1217, G1218, G1219, G1220, G1221, G1222, G1223, G1224, G1225, G1226, G1227, G1228, G1229, G1230, G1231, G1232, G1233, G1234, G1235, G1236, G1237, G1238, G1239, G1240, G1241, G1242, G1243, G1244, G1245, G1246, G1247, G1248, G1249, G1250, G1251, G1252, G1253, G1254, G1255, G1256, G1257, G1258, G1259, G1260, G1261, G1262, G1263, G1264, G1265, G1266, G1267, G1268, G1269, G1270, G1271, G1272, G1273, G1274, G1275, G1276, G1277, G1278, G1279, G1280, G1281, G1282, G1283, G1284, G1285, G1286, G1287, G1288, G1289, G1290, G1291, G1292, G1293, G1294, G1295, G1296, G1297, G1298, G1299, G1300, G1301, G1302, G1303, G1304, G1305, G1306, G1307, G1308, G1309, G1310, G1311, G1312, G1313, G1314, G1315, G1316, G1317, G1318, G1319, G1320, G1321, G1322, G1323, G1324, G1325, G1326, G1327, G1328, G1329, G1330, G1331, G1332, G1333, G1334, G1335, G1336, G1337, G1338, G1339, G1340, G1341, G1342, G1343, G1344, G1345, G1346, G1347, G1348, G1349, G1350, G1351, G1352, G1353, G1354, G1355, G1356, G1357, G1358, G1359, G1360, G1361, G1362, G1363, G1364, G1365, G1366, G1367, G1368, G1369, G1370, G1371, G1372, G1373, G1374, G1375, G1376, G1377, G1378, G1379, G1380, G1381, G1382, G1383, G1384, G1385, G1386, G1387, G1388, G1389, G1390, G1391, G1392, G1393, G1394, G1395, G1396, G1397, G1398, G1399, G1400, G1401, G1402, G1403, G1404, G1405, G1406, G1407, G1408, G1409, G1410, G1411, G1412, G1413, G1414, G1415, G1416, G1417, G1418, G1419, G1420, G1421, G1422, G1423, G1424, G1425, G1426, G1427, G1428, G1429, G1430, G1431, G1432, G1433, G1434, G1435, G1436, G1437, G1438, G1439, G1440, G1441, G1442, G1443, G1444, G1445, G1446, G1447, G1448, G1449, G1450, G1451, G1452, G1453, G1454, G1455, G1456, G1457, G1458, G1459, G1460, G1461, G1462, G1463, G1464, G1465, G1466, G1467, G1468, G1469, G1470, G1471, G1472, G1473, G1474, G1475, G1476, G1477, G1478, G1479, G1480, G1481, G1482, G1483, G1484, G1485, G1486, G1487, G1488, G1489, G1490, G1491, G1492, G1493, G1494, G1495, G1496, G1497, G1498, G1499, G1500, G1501, G1502, G1503, G1504, G1505, G1506, G1507, G1508, G1509, G1510, G1511, G1512, G1513, G1514, G1515, G1516, G1517, G1518, G1519, G1520, G1521, G1522, G1523, G1524, G1525, G1526, G1527, G1528, G1529, G1530, G1531, G1532, G1533, G1534, G1535, G1536, G1537, G1538, G1539, G1540, G1541, G1542, G1543, G1544, G1545, G1546, G1547, G1548, G1549, G1550, G1551, G1552, G1553, G1554, G1555, G1556, G1557, G1558, G1559, G1560, G1561, G1562, G1563, G1564, G1565, G1566, G1567, G1568, G1569, G1570, G1571, G1572, G1573, G1574, G1575, G1576, G1577, G1578, G1579, G1580, G1581, G1582, G1583, G1584, G1585, G1586, G1587, G1588, G1589, G1590, G1591, G1592, G1593, G1594, G1595, G1596, G1597, G1598, G1599, G1600, G1601, G1602, G1603, G1604, G1605, G1606, G1607, G1608, G1609, G1610, G1611, G1612, G1613, G1614, G1615, G1616, G1617, G1618, G1619, G1620, G1621, G1622, G1623, G1624, G1625, G1626, G1627, G1628, G1629, G1630, G1631, G1632, G1633, G1634, G1635, G1636, G1637, G1638, G1639, G1640, G1641, G1642, G1643, G1644, G1645, G1646, G1647, G1648, G1649, G1650, G1651, G1652, G1653, G1654, G1655, G1656, G1657, G1658, G1659, G1660, G1661, G1662, G1663, G1664, G1665, G1666, G1667, G1668, G1669, G1670, G1671, G1672, G1673, G1674, G1675, G1676, G1677, G1678, G1679, G1680, G1681, G1682, G1683, G1684, G1685, G1686, G1687, G1688, G1689, G1690, G1691, G1692, G1693, G1694, G1695, G1696, G1697, G1698, G1699, G1700, G1701, G1702, G1703, G1704, G1705, G1706, G1707, G1708, G1709, G1710, G1711, G1712, G1713, G1714, G1715, G1716, G1717, G1718, G1719, G1720, G1721, G1722, G1723, G1724, G1725, G1726, G1727, G1728, G1729, G1730, G1731, G1732, G1733, G1734, G1735, G1736, G1737, G1738, G1739, G1740, G1741, G1742, G1743, G1744, G1745, G1746, G1747, G1748, G1749, G1750, G1751, G1752, G1753, G1754, G1755, G1756, G1757, G1758, G1759, G1760, G1761, G1762, G1763, G1764, G1765, G1766, G1767, G1768, G1769, G1770, G1771, G1772, G1773, G1774, G1775, G1776, G1777, G1778, G1779, G1780, G1781, G1782, G1783, G1784, G1785, G1786, G1787, G1788, G1789, G1790, G1791, G1792, G1793, G1794, G1795, G1796, G1797, G1798, G1799, G1800, G1801, G1802, G1803, G1804, G1805, G1806, G1807, G1808, G1809, G1810, G1811, G1812, G1813, G1814, G1815, G1816, G1817, G1818, G1819, G1820, G1821, G1822, G1823, G1824, G1825, G1826, G1827, G1828, G1829, G1830, G1831, G1832, G1833, G1834, G1835, G1836, G1837, G1838, G1839, G1840, G1841, G1842, G1843, G1844, G1845, G1846, G1847, G1848, G1849, G1850, G1851, G1852, G1853, G1854, G1855, G1856, G1857, G1858, G1859, G1860, G1861, G1862, G1863, G1864, G1865, G1866, G1867, G1868, G1869, G1870, G1871, G1872, G1873, G1874, G1875, G1876, G1877, G1878, G1879, G1880, G1881, G1882, G1883, G1884, G1885, G1886, G1887, G1888, G1889, G1890, G1891, G1892, G1893, G1894, G1895, G1896, G1897, G1898, G1899, G1900, G1901, G1902, G1903, G1904, G1905, G1906, G1907, G1908, G1909, G1910, G1911, G1912, G1913, G1914, G1915, G1916, G1917, G1918, G1919, G1920, G1921, G1922, G1923, G1924, G1925, G1926, G1927, G1928, G1929, G1930, G1931, G1932, G1933, G1934, G1935, G1936, G1937, G1938, G1939, G1940, G1941, G1942, G1943, G1944, G1945, G1946, G1947, G1948, G1949, G1950, G1951, G1952, G1953, G1954, G1955, G1956, G1957, G1958, G1959, G1960, G1961, G1962, G1963, G1964, G1965, G1966, G1967, G1968, G1969, G1970, G1971, G1972, G1973, G1974, G1975, G1976, G1977, G1978, G1979, G1980, G1981, G1982, G1983, G1984, G1985, G1986, G1987, G1988, G1989, G1990, G1991, G1992, G1993, G1994, G1995, G1996, G1997, G1998, G1999, G2000, G2001, G2002, G2003, G2004, G2005, G2006, G2007, G2008, G2009, G2010, G2011, G2012, G2013, G2014, G2015, G2016, G2017, G2018, G2019, G2020, G2021, G2022, G2023, G2024, G2025, G2026, G2027, G2028, G2029, G2030, G2031, G2032, G2033, G2034, G2035, G2036, G2037, G2038, G2039, G2040, G2041, G2042, G2043, G2044, G2045, G2046, G2047, G2048, G2049, G2050, G2051, G2052, G2053, G2054, G2055, G2056, G2057, G2058, G2059, G2060, G2061, G2062, G2063, G2064, G2065, G2066, G2067, G2068, G2069, G2070, G2071, G2072, G2073, G2074, G2075, G2076, G2077, G2078, G2079, G2080, G2081, G2082, G2083, G2084, G2085, G2086, G2087, G2088, G2089, G2090, G2091, G2092, G2093, G2094, G2095, G2096, G2097, G2098, G2099, G2100, G2101, G2102, G2103, G2104, G2105, G2106, G2107, G2108, G2109, G2110, G2111, G2112, G2113, G2114, G2115, G2116, G2117, G2118, G2119, G2120, G2121, G2122, G2123, G2124, G2125, G2126, G2127, G2128, G2129, G2130, G2131, G2132, G2133, G2134, G2135, G2136, G2137, G2138, G2139, G2140, G2141, G2142, G2143, G2144, G2145, G2146, G2147, G2148, G2149, G2150, G2151, G2152, G2153, G2154, G2155, G2156, G2157, G2158, G2159, G2160, G2161, G2162, G2163, G2164, G2165, G2166, G2167, G2168, G2169, G2170, G2171, G2172, G2173, G2174, G2175, G2176, G2177, G2178, G2179, G2180, G2181, G2182, G2183, G2184, G218

Ecological Impact Assessment

An Ecological Impact Assessment (EclA) in line with current guidelines has not been provided to support this application. We recommend that a single document be provided by applicants to support applications. Having a single document based on submitted designs, makes local authority review easier and can provide a more cohesive approach to avoidance, mitigation, compensation and enhancement measures. The EclA which has been provided does not show clearly how the mitigation hierarchy has been and will be applied to proposals. The EclA does not provide a full impact assessment, nor does it provide clear outline avoidance, mitigation, compensation and enhancement measures which have been committed to, that can be secured, and that will be delivered as part of proposals.

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. Given that swifts and roosting bats are known to occur on-site, we recommend that the submission commit to a minimum number of bat and bird boxes to be incorporated within new buildings on-site.

The recommended ratio of integral nest boxes⁸ to residential units is 1:1, with 4-10 recommended for a small block of flats and 10-40+ for larger developments (e.g. warehouses, schools, hospitals and large blocks of flats). Integral swift and bat features are also supported by the NPPF 2024 187(d). The adopted Kent Biodiversity Strategy 2020-2045⁹ also contains the target: *“stop the decline of swifts by ensuring that every new house built in Kent contains one swift-box or nest-brick.”*

Veteran Trees

We note that three trees are classified as veteran fruit trees and irreplaceable habitat. These trees should be prioritised for retention. We note that the biodiversity net gain validation statement indicates that these trees: T61, T89 and T90 will be removed. However, whilst the arboricultural impact assessment lists T90 for removal, T61 and T89 appear to be being retained and lie within the open space identified within the parameter plan. We would recommend that a commitment be made at this stage regarding the retention of irreplaceable habitats that is reflected within the biodiversity net gain calculations. We would also recommend that robust justification be provided for why all the irreplaceable habitat on-site cannot be retained.

Any loss of irreplaceable habitat is to be considered under the NPPF 2024, paragraph 193(c), which states: *“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.*

We would recommend that retained irreplaceable habitat include a suitable buffer. The buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. We note that at present, at least T89 does not appear to have an adequate root protection area. The root

⁸ BS 42021:2022 'British Standard for integral nest boxes'

⁹ [Kent Nature Partnership Biodiversity Strategy 2020-2045 \(kentnature.org.uk\)](https://kentnature.org.uk/kent-nature-partnership-biodiversity-strategy-2020-2045)

protection area needs to be in place during and post-construction (e.g., through the implementation of post and rail fencing).

Bats

A bat survey report forms part of the submission material. This report provides information relating to preliminary roost assessments, emergence surveys, night-time bat walkovers and automated static detector surveys in 2025. The site is used by roosting, commuting and foraging bats. No commitment regarding an outline lighting strategy has been provided and we request further information regarding the most sensitive bat foraging and commuting habitat on-site and the necessary mitigation measures required.

Commuting and Foraging Bats

At least eight bat species were recorded using the site for foraging and commuting. Some of these species are rarer species in a UK context, and some of these species are known to be very light sensitive. We request that a clear assessment be undertaken regarding the importance of the assemblage on-site in line with the latest bat mitigation guidelines¹⁰ (Tables 3.1 and Table 3.3).

The survey report with regards to static detector survey analysis is difficult to interpret. The survey report has not defined 'bat pass' and has not presented the data as number of bat passes per hour, as recommended in the bat survey guidelines. Despite this, the project ecologists have defined the site as of 'low ecological importance' without providing appropriate justification and clear reference values. The bat survey guidelines also recommend using Ecobat ([Bat survey tools — Mammal Society](#)) to provide standardised outputs and to work towards bat activity reference scales of activity for the UK (as available in France: [Reference scales of activity | Team-Chiro](#)).

Roosting Bats - Buildings

The presence of common pipistrelle flying onto the site from off-site locations close to sunset indicates that common pipistrelle from off-site roosts are using the site. Common pipistrelle roosts were also detected on-site in Building 15 (Evelyn Cottage), Buildings 8a, 14 and 9. We note that emergence surveys of the buildings were carried out during July and August in the bat maternity season. We also note that some of the surveys did not follow standard survey guidelines and that roosts have not been characterised. Roost types have not been provided in the submitted reports and no outline avoidance, mitigation, compensation or enhancement measures have been provided for bat roosts on or off-site.

Additionally, plans showing the locations of surveyors, infrared cameras and potential roost features for each emergence survey/bespoke survey have not been provided within the submission. We request that this information be provided, along with the walking methodology, route taken and detailed reasoning for the bespoke farmyard survey in lieu of standard accepted survey effort.

Building 15 assessed to have moderate bat roosting suitability had two surveys conducted in line with guidelines, but when two common pipistrelle roosts were recorded, no further surveys were conducted to characterise the roost, and no roost type has been provided

¹⁰ [UK Bat Mitigation Guidelines 2025 | CIEEM](#)

within the report. Additionally, no outline mitigation and compensation strategy has been provided for the assumed loss of these roosts.

We note some variation between the preliminary roost assessments provided within the outline EclA and bat survey report and that buildings identified to have low or negligible bat roosting suitability were surveyed following a 'bespoke survey'. This survey falls outside standard professional guidelines and justification for its use and reliability over standard survey types have not been provided.

A bespoke survey, relatively late in the maternity season (28th July 2025), rather than standard accepted survey effort was used to survey Buildings 8a, 9 and 14. These buildings were assessed during the preliminary roost assessment to be of low roosting suitability. Across 12 buildings on-site (including these three), three mobile surveyors and eight infrared cameras were used to cover 'certain features'. This is not accepted practice to assess low suitability buildings for roosting bats. Further, whilst one roosting common pipistrelle bat was recorded emerging from Building 8a, one roosting common pipistrelle from Building 14 and two from Building 9, no further survey work was undertaken to characterise these roosts. No roost type, outline avoidance, mitigation or compensation measures have been provided. We consider that it is likely that for these buildings further survey work to characterise the roosts will be required.

Roosting Bats - Trees

The arboricultural impact assessment indicates that trees, including ecologically valuable trees are proposed for removal from the site. However, no tree roost surveys in line with current guidelines, nor any avoidance, mitigation or compensation measures have been proposed. This information needs to be provided to support the application in line with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005¹¹ 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"*.

Birds

Breeding bird surveys were undertaken on-site (four daytime survey visits between 12th May 2025 and 16th June 2025). The project ecologists have justified that four visits (rather than the standard six) are proportionate given the size of the proposed development and types of habitats present. The surveys were only carried out across two months when surveys are usually recommended between late March and early July with at least one nocturnal visit to ensure the maximum spread of breeding species that could make use of the site is captured. The survey effort provided therefore falls well short of expected professional standards. The submitted information also does not provide a clear impact assessment, or clear avoidance, mitigation, compensation and enhancement measures.

Given the habitat types and land use recorded, we do not request further survey information at present (although if sufficient habitat cannot be retained and/or created on-site then we may request it). However, we do request further information, including an outline avoidance, mitigation, compensation and enhancement strategy that commits to

¹¹ [odpm-circ-0605.qxd \(publishing.service.gov.uk\)](#)

retaining as much habitat as possible that is most likely to provide the best habitat on-site for breeding birds. Where breeding bird habitat cannot be retained, we request that appropriate mitigation and compensation is put forward.

We note that given the recorded presence of swift on-site, the development provides an excellent opportunity to incorporate swift nesting habitat into the development as an enhancement.

Recreational Disturbance; Designated Sites

The application site falls within the 6km zone of influence of the Thames Estuary and Marshes Special Protection Area and its associated Wetland of International Importance under the Ramsar Convention (Ramsar Site).

This type of development may cause additional recreational disturbance, and likely significant effects on birds using the SPA and Ramsar sites. As such, the North Kent Strategic Access Management and Monitoring Strategy (SAMMS) applies and the applicant will be required to make a tariff payment which is based on the net number of additional dwellings/overnight accommodation proposed. The payment is to mitigate for additional recreational effects on the designated sites. The local planning authority must ensure that adequate means are in place to secure this mitigation before first occupation.

Gravesham Borough Council must consider the impact the proposal will have on these designated sites in accordance with the Conservation of Habitats and Species Regulations (CHSR) 2017 (as amended) and the National Planning Policy Framework (NPPF) 2024.

A decision from the Court of Justice of the European Union (CJEU: C-323/17) has detailed that mitigation measures cannot be considered when carrying out a screening assessment to decide whether a full 'Appropriate Assessment' is needed under the Habitats Directive. Therefore, we advise that there is a need for the local planning authority to carry out an Appropriate Assessment as part of a Habitats Regulations Assessment (HRA).

For this type of development, it is possible to obtain an autogenerated Natural England advice letter which we have attached to the email accompanying this advice note.

Emma England **Biodiversity Officer**

This response was submitted following consideration of the following documents:

Clague Architects (December 2025) Parameter Plan. 22628B/10. Proposed Residential Development, Istead Rise.

Clague Architects (December 2024) Proposed Site Plan. 22628B/10. Proposed Residential Development, Istead Rise.

Down to Earth (November 2025) Rose Farm, Downs Road, Istead Rise, DA13 9HG. BS 5837 Arboricultural Impact Assessment Report (AIA). Tree Protection Plan.

EPR (November 2025) Land at Rose Farm, Downs Road, Istead Rise. Outline Ecological Impact Assessment.

EPR (November 2025) Land at Rose Farm, Downs Road, Istead Rise. Breeding Bird Survey Report.

EPR (November 2025) Land at Rose Farm, Downs Road, Istead Rise. Reptile Survey Report.

EPR (November 2025) Land at Rose Farm, Downs Road, Istead Rise. Technical Note: Biodiversity Net Gain Validation Statement.

EPR (December 2025) Land at Rose Farm, Downs Road, Istead Rise. Bat Survey Report.

EPR (December 2025) Land at Rose Farm, Downs Road, Istead Rise. Habitats, Flora and Vegetation Survey Report.

Stantec (November 2025) Land at Rose Farm, Istead Rise. Illustrative Landscape Masterplan.

Woodward, A. (December 2025) Application for Outline Planning Permission with some matters reserved. PP-14468593. Gravesham Borough Council. Land at Rose Farm, Istead Rise.