



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher
FROM: Elizabeth Fagg
DATE: 17 May 2024
SUBJECT: 20240239 / Azila, Harvel

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 PROVIDED

We have reviewed the bat survey information submitted by the applicant and advise that sufficient ecological information has been provided. We have taken this view as no roost features were found or impacts from demolition to bats were identified in the bat scoping survey (KB Ecology Apr 24). We also viewed additional photos of the surrounding from the agent which showed an apparent hardcore surface widespread around the structures proposed for demolition and rebuild. The hardcore presence indicates a lower likelihood of valuable habitat and protected species presence around the proposed site. We therefore recommend a precautionary mitigation approach.

We would like to highlight there appears to be less vegetation in the photos from the applicant (10/5/24) compared to the Bat Scoping survey. If there has been vegetation clearance works and any habitats previous on site have supported protected/notable species, it is likely that the works have resulted in a breach of wildlife legislation. Any enhancement plans need to consider any losses to habitats and ensure there is a net gain in biodiversity based on the habitats present on site, prior to any vegetation clearance works.

PRECAUTIONARY WORKING MEASURES

The site is adjacent to Strawberry Hill, Pasture & Woodland, Meopham Local Wildlife Site and there is some potential for mobile wildlife to use the site and precautionary working methods are recommended to avoid any harm during clearance and construction phases. All trees/hedgerows within or bordering the proposed development shall be protected during construction in line with standard arboriculture best practice (BS5837:2012). A suggested precautionary mitigation approach suggested condition wording is below;

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

- 1) The adjacent hedgerow and trees, including their roots, will be protected from damage;*
- 2) 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.*
- 3) 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*
- 4) Backfilling of trenches and other excavations will be undertaken before nightfall, or a ramp will be left to allow any animals to easily exit;*
- 5) All excavations and trenches will be checked each morning throughout the construction period and prior to infilling;*

LIGHTING

Nocturnal animals (including bats) are likely to be present foraging around the site and surrounding rural area and any lighting associated with the proposal may have a negative impact. We advise that the **condition wording** for any external lighting (if granted) requires the following requirements:

- Plan showing location of lighting
- Downward facing
- On a motion sensor
- *Follow the recommendations within Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 08/23 Bats and Artificial Lighting at Night'*

ENHANCEMENTS

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) 2023, biodiversity should be maintained and enhanced through the planning system. As such, if planning permission is granted, we advise that a condition is included requiring an ecological enhancement plan to be submitted. We recommend the following wording:

Within three months of works commencing, detailed plans showing how the development will enhance and maintain biodiversity, plus an establishment and management plan for native planting, will be submitted to, and approved in writing by, the local planning authority. This will include details of native and wildlife-friendly planting, integrated bat and bird bricks and/or durable boxes, and hedgehog holes in any close board fencing. The approved measures will be implemented and retained thereafter.

Appendix 1 provides some generic (non-exhaustive) information regarding the most common enhancements we see proposed. To provide a view regarding the potential ecological benefits of any project, in line with relevant legislation and planning policy, we require sufficient detail to be submitted. Without sufficient detail we are unable to provide an opinion regarding the suitability of any proposed measures. Suitable detail may include the provision of information such as:

- The proposed target species;
- Make and model of any boxes;
- Location information such as height, aspect, surrounding habitat;
- Detailed planting schedules; and
- Relevant management necessary to ensure the habitat is suitable for the target species.

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, GSP, Mar 24
- Existing block site locations, GSP, 29/2/24
- Proposed Block Plan, GSP 6/3/24
- Bat Scoping Survey, KB Ecology, 25/4/24
- Photographs, Email LPA 10/5/24

Appendix 1: Ecological Enhancement Measures

Possible Biodiversity Enhancements	Details
Provision of ready-made bird boxes	Suitability: All development. Location: Semi-mature/mature trees, buildings To provide a long-term ecological benefit for the site, boxes will need to be correctly sited: • Be away from windows and doors; • Be at the appropriate height for the target species and erected in accordance with the manufacturer guidelines; • Be sheltered, and sited on a northern or eastern facing aspect; • The boxes should be away from artificial light sources. • If siting on a tree, place the box in a way that avoids damaging the tree, and select a mature or semi-mature specimen; and • There should be a clear flight path to the box, so vegetation should not clutter the box entrance. Material: Wall or tree-mounted woodcrete or building integrated boxes are generally recommended for development projects over wooden boxes. Wooden boxes are only likely to last 5-10 years before needing to be replaced to continue to provide a wildlife benefit. A woodcrete box has a much longer lifespan of 20-25 years before needing to be replaced. We would always recommend durable materials be selected for installation to minimise maintenance in the long-term and to provide a longer-term assurance of biodiversity net gain in line with the NPPF 2023. Maintenance: Many bird boxes need clearing out at the end of the nesting season. The manufacturer can provide relevant information as well as the Royal Society for the Protection of Birds (RSPB)¹ and British Trust for Ornithology (BTO)².

¹ [How To Clean a Bird Nesting Box - The RSPB](#)

² [Putting up a nest box | BTO - British Trust for Ornithology](#)

Provision of bat boxes/bricks/tubes/tiles or bat roosting spaces within the new buildings	Suitability: Most development. Location: Semi-mature/mature trees, buildings To provide a long-term ecological benefit for the site, boxes will need to be correctly sited: • Be away from windows and doors or any features that might allow access to cats; • Be at the appropriate height (ideally 4-5m high) and erected in accordance with the manufacturer guidelines. • Be sheltered, and with the majority sited on a southerly facing aspect; • The boxes and a flight path to the box should be unlit; • A clear flight path to the box is needed, so vegetation should not clutter the space around the box; and • On trees, only mature or semi-mature specimens should be chosen. Material: Wall or tree-mounted woodcrete or building integrated boxes are generally recommended for development projects over wooden boxes. Wooden boxes are only likely to last 5-10 years before needing to be replaced to continue to provide a wildlife benefit. A woodcrete box has a much longer lifespan of 20-25 years before needing to be replaced. We would always recommend durable materials be selected for installation to minimise maintenance in the long-term and to provide a longer-term assurance of biodiversity net gain in line with the NPPF 2023. Maintenance: Bat boxes should only be checked by a suitably licensed individual to avoid breaches of legislation.
Provision of space for solitary bees	Suitability: Most development. Location: Building integrated or wall-mounted Bricks or boxes for solitary bees need to be correctly sited in a warm, sunny spot. The box should be near vegetation, but vegetation should not clutter the entrances. Place at least 1m from ground level. The box should not sway in the wind or easily become dislodged. Avoid where possible using single large hotels. Instead use lots of smaller ones spaced around the site. Material: Woodcrete boxes and building integrated boxes are generally recommended for development projects over wooden/other boxes. Although, as some sources recommend regular maintenance of solitary bee hotels, provided

	there is a commitment to regular maintenance, less durable boxes can be acceptable. Erection: Follow the manufacturer guidelines. Maintenance: See www.bumblebeeconservation.org/bee-nest-boxes/. And here.
Provision of hedgehog holes in fencing	Suitability: Many developments. Location: Base of fencing Construction: 13cm x 13cm gaps at the base of fencing to allow hedgehog access to all garden areas. To reduce the risk of the holes being blocked by future residents, a sign above the hole is recommended as shown on the hedgehog street website³.
Provision of hedgehog nesting boxes	Suitability: Many developments. Location: Tucked away under a hedge, in shrubbery or near a wall in a quiet, sheltered place. Place the box where it will not flood after heavy rain. Material: Woodcrete boxes are generally recommended for development projects over wooden/other boxes. Boxes should have a tunnel entrance or internal dividing wall to reduce risk of predators getting to the hedgehogs inside. Maintenance: See information provided by Hedgehog Street⁴ or The British Hedgehog Preservation Society⁵.
Provision of hibernacula (for great crested newts or reptiles)	Suitability: For larger sites with suitable habitats such as hedgerows and long grassland. Location: A sunny position on a well-drained site, not prone to flooding. One of the long sides should be south-facing. Should be placed in a patch of suitable habitat such as tussocky grassland with minimal public disturbance. Material and construction: For reptiles at least 4m long, 2m wide and 1m high and for great crested newt at least 2m long, 1m wide and 1m high. On free-draining soils, locate below ground level by excavating a pit or trench, then

³ [Link your garden with a hedgehog highway \(hedgehogstreet.org\)](http://hedgehogstreet.org)

⁴ <https://www.hedgehogstreet.org/cleaning-out-boxes/>

⁵ [Hedgehog Homes \(britishhedgehogs.org.uk\)](http://britishhedgehogs.org.uk)

	infilling with a mixture of topsoil and rubble, sleepers, logs, etc. For ideas on the design and construction of suitable hibernacula, see here. Maintenance: Hibernacula should be left undisturbed. Where log filled hibernacula deteriorate over time, to maintain habitat provision, consider building new ones.
Provision of log piles (for invertebrates, but could also benefit other species e.g., amphibians, reptiles, hedgehogs)	Suitability: For sites which can provide the right location and surrounding vegetation. Location: Wood in direct contact with the ground, in dappled shade. Can be placed in shrub beds, edge of woodland, near hedgerows, in long grassland etc. Material and construction: Logs at least 100mm thick with the bark still attached, and from native hardwood species. Lay stacks of logs on their side in compact piles to maintain humidity. To prevent the logs rolling, drive a stake into the ground on either side of the pile. Can also partially bury logs vertically in the ground to an approximate depth of 450 to 500mm. Use logs of different diameters and length and bury them side-by-side to form a pyramid⁶.
The creation of ponds	Suitability: Many developments. Location: Place away from the root protection area of trees and risk excess leaf litter. Ideally have some longer vegetation and log piles around the edge of the pond, and this connected to suitable habitat in the wider environment. This will encourage the movement of wildlife to and from the pond. Construction: For maximum benefit to wildlife, the pond should be left to colonise naturally (if in a good location for it to do so) or planted with native, local provenance plants and include no fish. Consider what to do with the spoil removed from the pond (avoid placing topsoil in a location where sediment run-off to the pond could occur). Spoil could be used in the construction of other wildlife features such as hibernacula. Create varied depths in the pond: shallow margins and areas that allow any animals that get into the pond to escape, deeper areas, at least 600mm in the middle of the pond. Where planting up, allow for submerged and emergent

⁶ [Build-a-log-pile-for-stag-beetles.pdf \(ptes.org\)](#)

	vegetation. <i>How to build a wildlife pond guide:</i> http://www.froglife.org/wp-content/uploads/2013/07/JAW2014-for-printing-HLF1.pdf https://freshwaterhabitats.org.uk/pond-clinic/create-pond/
Provision of native/ wildlife-friendly planting	Suitability: Most development. Native Species: An RHS study found that the best way to support invertebrates in gardens and promote a healthy ecosystem, is to choose plantings biased towards British native plants, and encourage dense vegetation, although leaving some areas of bare soil⁷. https://www.rhs.org.uk/advice/profile?pid=848 or https://www.britishflora.co.uk Hedgerows: As far as possible, hedgerows should be connected to high-quality habitats to improve species movement. To maximise any potential wildlife benefit long-term, species-rich (containing at least 5 different species) native hedgerows should be prioritised and be managed sympathetically for wildlife. They should have a target height and width of at least 1.8m by 1.8m. A native hedgerow consisting of a single species, managed to 1m high by 1m wide and cut every year will likely provide very limited ecological benefit in comparison. Hedgerows should ideally be managed sensitively on a three year rotation, with cutting avoiding the bird breeding season and retaining at least some winter fruit/berries (see here). Establish climbing plants on walls and other vertical structures: Where space is limited, climbing plants can provide increased wildlife benefit within the space available. Climbing Plants & Wall Shrubs - The RSPB

⁷ [Plants for Bugs - RHS science projects / RHS Gardening](#)