



ECOLOGICAL ADVICE SERVICE

TO: Alison Webster

FROM: Elizabeth Fagg

DATE: 07 October 2025

SUBJECT: 20250807 Land off Heron Hill, Meopham

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 documents and have not commented on conditions 7,8,12,13,14 and 16 as they are not our area of expertise. The tree officer will need to be consulted.

We are satisfied that sufficient information has been provided to discharge condition 19.

We recommend that condition 9 is not discharged until the information for condition 15 BNG is provided.

We require the following biodiversity net gain information as stated by condition 15

- **Baseline habitat map for preclearance habitats**
- **BNG metric**
- **Biodiversity gain plan**
- **Biodiversity Management and Monitoring Plan**

We require the following information for condition 18

- **Revised landscape plan with**
 - detail on the retained and new hedgerows to clarify existing and proposed
 - detail on the grass type proposed for the verge

- **Detail on if and how the buddleia will be managed**
- **Demonstrate that it corresponds with the BNG information required as condition 15**

Condition 9)

No caravans shall be brought onto site until a soft landscaping scheme for the whole site, including a timetable for implementation and completion, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include:

- *A survey of the position of trees within 10 metres of the site boundary, including their spread and root protection area and details of measures for their protection, including their canopy and root systems, throughout the construction phases of the development.*
- *Details of the number, density, species, heights and position of all trees, shrubs and hedges to be planted.*

An arboricultural impact assessment has been provided, and this includes the existing trees within 'likely zone of influence' for the report so we are satisfied the report likely covers the 10m specified within the condition, as the accompanying letter states 6 of the trees studied are not within the site, but we cannot give a definite confirmation on the areas of survey. Mitigation for surfacing materials are outlined, and tree protection measures have been stated for during the construction phase. We recommend a tree officer reviews this report as this is not our area of expertise

For the planting element of this condition a simple plan has been provided which shows the location of existing hedgerow and trees. It also shows; areas of regenerating margins, regenerating woodland chalk bank, hedgerows, proposed grass verge and a new 'landscaped area' with '3 trees and shrubs'.

The planting details of the 'landscaping area' has been included within the covering letter and is sufficient for that area. Details of hedgerow planting that is establishing is also sufficient for the boundaries but we note the hedgerows planned for the base of terrace walls is stated as not possible, failing due to lack of soil substrate.

The accompanying letter states that planting opportunities are limited due to the lack of soil and the photographs in the ecology report following the terrace engineering, shows that little soil is present. This has reduced the opportunities for planting and a regenerating margin to the south and landscaped area to the south west are to compensate.

We consider the 3m woodland natural regeneration strip to the eastern boundary is not tree planting, differing from original plans for application 20220106, approved at appeal. We understand that tree planting is a compensation measures and as little soil is present, planting conditions would be difficult for establishing trees but as natural regeneration is occurring, as detailed in the covering letter, we consider that there could be the possibility trees could establish and that should be implemented if possible.

We consider that the BNG documents for condition 15 will provide information to show if these planting measures are sufficient to avoid no net loss of biodiversity. **We recommend this condition is not discharged until the BNG information is provided to show no net loss has occurred.**

Condition 13)

No development shall commence until details of hard landscape works have been submitted to and approved in writing by the local planning authority. These details shall include:

- earthworks showing existing and proposed finished levels or contours;*
- means of enclosure and retaining structures;*
- boundary treatment[s];*
- hard surfacing materials;*
- **lighting, floodlighting and CCTV;***
- details of bin storage areas;*
- an implementation programme.*

The landscaping works shall be carried out in accordance with the approved details before any part of the development is first occupied in accordance with the agreed implementation programme. The completed scheme shall be managed and/or maintained in accordance with an approved scheme of management and/or maintenance

We have no comments to make on this condition as we have commented on lighting as part of C19

Condition 15)

No further development shall commence until a Biodiversity Gain Plan and Biodiversity Management and Monitoring Plan have been submitted to the local planning authority for written approval, as evidence that offsite compensation for loss of priority habitat woodland will be achieved as part of the proposals. The Biodiversity Gain Plan will include an updated metric calculation which details the loss of high distinctiveness priority habitat woodland from within the site and an agreement for offsite compensation to achieve 10% net gain relative to the preclearance baseline. The Biodiversity Management and Monitoring Plan shall include 30-year objectives, management responsibilities, maintenance schedules and a methodology to ensure the submission of monitoring reports demonstrating how habitat management is progressing towards achieving the metric objectives. The Plan will include evidence of remedial arrangements and details of any rectifying measures as required. The Biodiversity Management and Monitoring Plan shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery.

We agree that this application does not require to demonstrate mandatory BNG as required under the Environment Act 2021. However, the application is still required to demonstrate 10% BNG as part of this condition above, due to the loss of priority woodland.

No BNG information has been submitted, and we require the information as stated by the condition. To address the requirements of the condition we advise that the following documents are submitted.

- Baseline habitat map for preclearance habitats**
- BNG metric**
- Biodiversity gain plan**
- Biodiversity Management and Monitoring Plan**

Condition 16)

No further development shall commence until an ancient woodland mitigation plan has been submitted to the local planning authority for written approval. The plan will include details of an arboricultural impact assessment undertaken by a suitably qualified person, and will detail measures to protect the Root Protection Area of ancient woodland trees and to avoid increased recreation impacts on the retained woodland areas. The approved Plan will be implemented and retained thereafter.

The arboricultural impact assessment has been provided with root protection areas. It has assessed that the woodland to the west of the site will not be impacted due to the low impact design, existing roadway and site conditions. **This is not our area of expertise and we recommend the tree officer is consulted**

Condition 18)

No further development shall commence until a Landscaping Plan for Biodiversity has been submitted to the local planning authority for written approval. The Plan will include details of a native species planting scheme including the reinstatement of the woodland bank along the eastern site boundary, planting of a 3m wide strip of chalk scrub along the northern boundary, native tree planting and native hedgerows in accordance with the preliminary ecology report (R. Webb, May 2022) and planning statement (Heine, February 2022). The Plan will include a work schedule detailing management proposals for all areas of landscaping. All measures will be implemented as approved and retained thereafter.

A simple plan has been provided which shows the hedgerows, 3 trees plus shrubs and other areas of planting or natural regeneration. Chalk scrub landscaping planned for the northern boundary is stated as a native hedgerow within the submitted documents. The cover letter states this scrub has now moved to the eastern boundary and is through natural regeneration. This change to the plans is disappointing as the site is within an area of priority deciduous woodland habitat and clearance works have already occurred for this retrospective proposal. We consider that 3 trees is too minimal and that more young trees should be implemented, where possible.

The northern hedgerow is stated in the covering letter and planted up with native hedgerow giving species and planting method. The plan states that this is existing hedgerow and this needs clarifying in revised documents requested below.

The chalk bank reinstatement states that buddleia is present the instructions state 'remove invasive species'. Buddleia is considered an Invasive Non-Native Species¹ and no detail is given regarding the buddleia and this needs to be clarified within the plans.

We are unable to determine the depth of the planting areas to the northern and eastern boundary as they are not stated. Further opportunities that can be used are that the 2m grass verge could be planted with a wild flower mix to enhance that area and planters could be used to provide further areas of planting as the hardstanding will be restrictive.

As the BNG condition (15) information is required we recommend that further detail is provided and we recommend it includes the following

¹ <https://www.nonnativespecies.org/non-native-species/information-portal/view/581>

- **Revised landscape plan with**
-detail on the retained and new hedgerows to clarify existing and proposed
-detail on the grass type proposed for the verge
- **Detail on if and how the buddleia will be managed**
- **Demonstrate that the landscaping plan corresponds with the BNG information required as condition 15**

Condition 19)

No further development shall commence until a lighting plan for biodiversity is submitted to, and approved in writing by, the local planning authority. Lighting will be designed in accordance with the Bat Conservation Trust's 'Guidance Note 8: Bats and Artificial Lighting 08/23'. The Plan will show the type and locations of proposed external lighting, as well as the expected light spill in lux levels on both vertical and horizontal planes, to demonstrate that areas to be lit will not adversely impact biodiversity. This will include details of any measures to reduce impacts from emitted internal lighting, such as cowls, recessed lighting or glazing treatments. All lighting will be installed in accordance with the specifications and locations set out in the plan and will be maintained thereafter. No additional lighting will be installed without prior written approval from the local planning authority.

A lighting plan with lux levels has not been provided and details have been provided within the cover letter. Lighting is to be placed at the end of terraces, gateposts and utility buildings and all are stated as fixed downlights. Domestic lighting to the mobile home will be part of the supplied fittings of the mobile home and are stated as small but otherwise not detailed

This information is not to the normal standard submitted and as this site is surrounded by woodland we would have preferred example fittings, lux levels and any measure to show mobile home lighting is downward facing. However, suitable bulbs and PIR systems have been stated and the avoidance of lighting upwards, or illuminating any trees, hedgerows or ecological features is suitable. **We are satisfied that sufficient information has been provided to discharge this condition.**

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:

- Site development scheme conditions drawing
- Arboricultural Impact Assessment, Silva Arboriculture Ltd, Jul 25
- Letter to LPA, Heine Planning Consultancy, 6/8/25
- Ecology survey report, May 22