



ECOLOGICAL ADVICE SERVICE

TO: Rebecca Harrison

FROM: Lucy McGinley

DATE: 30 June 2026

SUBJECT: 20260378 – Scouts Hall, Gravesend

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 in relation to approval of condition 5 (Biodiversity Gain Plan), condition 6 (Landscape and Ecological Management Plan (LEMP)), condition 8 (Cycle Storage Facilities) and condition 10 (External Lighting) attached to planning reference number 20250130 and advise that **insufficient** ecological information has been provided to discharge condition 10.

Condition 5 states: *Prior to any landscaping works commencing on site a Biodiversity Gain Plan shall be submitted to and approved in writing by the Local Planning Authority. The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the Biodiversity Net Gain Metric and the Biodiversity Net Gain Assessment Issue 2.1 by Arbtech Consulting Ltd (January 2025). The approved plan shall be implemented as described and retained thereafter.*

Comments provided separately

Condition 6 states: *Prior to any landscaping works commencing on site a Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The plan shall accord with the measures outlined in the*

Preliminary Ecological Appraisal and Preliminary Roost Assessment Report (Arbtech, Oct 24), Bat Survey Report (Arbtech, Sept 25) and Biodiversity Net Gain Assessment (Arbtech, Jan 25) associated with the planning application and shall include details of the following:

- a) Habitat creation measures, including full details of all habitats contributing to BGN onsite*
- b) A full planting schedule utilising primarily native species;*
- c) Full elevations plans detailing the model and location of integral swift boxes in accordance with BS 42021:2022 (north/east facing, 4m from the ground and with unobstructed access);*
- d) Details of externally-mounted bat and bird boxes which are to be of durable construction and suitably located;*
- e) Locations of 13×13cm holes in close board fencing provided for hedgehogs*
- f) Rolling, long-term maintenance measures covering up to a 30-year period; and*
- g) Details of responsible persons.*

The approved plan shall be implemented as described and retained thereafter.

On-site habitat enhancements of bat boxes, wildflower planting and hedgehog highways, plan have been confirmed via the LEMP.

We advise that we are satisfied with the proposed enhancement and on-going management.

we are satisfied that the condition can be discharged.

Condition 8: Cycle Storage Facilities

Reason: outside of our remit *Comments not provided*

Condition 10: states: No external lighting, whether temporary or permanent, shall be installed on the site unless details are submitted to and approved in writing by the Local Planning Authority. Details of any proposed external lighting shall accord with the Bat Conservation Trust/Institute of Lighting Professionals 'Guidance Note 08/23: Bats and Artificial Lighting at Night' and demonstrate that no impacts to bat foraging/commuting activity will result. Such details shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) as well as an ISO lux plan showing light spill. The details shall be implemented as approved and retained thereafter.

The following luminaire specifications must be considered within the lighting strategies to determine effects on protected species, based on section 4.9 of the Bat Conservation Trust and Institute of Lighting Professionals 'GN08: Bats and Artificial Lighting', which have been met:

- <1 lux light spill into identified bat foraging/commuting corridors (ideally 0.2 horizontal and 0.4 vertical) **(confirmation of horizontal direction of light spill to not affect foraging/commuting corridors)**
- LED with no UV element **(LED proposed)**

- Warm lighting preferred (<2700K) (colour temperature provided currently exceeding 2700K, but can be changed to compensate)
- Recessed/downward facing (0% upward illumination pattern, use of baffle/hood)
- Motion sensors (PIR) (currently no confirmation on motion sensors, but should be changed to compensate or provide confirmation on external lighting timing of usage)

Details of the lighting provided do not currently meet the Bat Conservation Trust standards, as the colour temperature exceeds the 2700K maximum and has no details on all exterior lighting points planned usage. In addition to this, no formal Sensitive Artificial Lighting Strategy has been provided, as stated within the LEMP as one of the enhancements.

It would be preferable that the lighting meets those requirements but we acknowledge that it is the scout hall and therefore will not be operational 24hours a day.

We advise that the lighting must be switched off when the hall is not in use.

The condition can be discharged.

Lucy McGinley
Biodiversity Officer

This response was submitted following consideration of the following documents:

- LEMP, Arbtech, V2, Nov25
- Lighting Plan, Ansell Lighting, March26
- Lighting Data Sheet, Ansell Lighting, March26
- Cover Letter, DJM Town Planning Ltd, April26
- BNG Metric, Arbtech, Jan25