



ECOLOGICAL ADVICE SERVICE

TO: Amanda Cue
FROM: Lucy McGinley
DATE: 21 July 2026
SUBJECT: 20260444 – 90 Downs Road, 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 – SUFFICIENT INFORMATION

We have reviewed the submitted documents in relation to conditions condition 3 (External Facing Materials), condition 4 (Archaeological Watching Brief), condition 5 (Construction Ecological Management Plan), condition 7 (Ecological Plan), condition 9 (Soft Landscaping), condition 10 (Hard Landscaping) and condition 12 (External Lighting) attached to planning reference number 20250937.

Condition 3, 4 and 10 are not our area of expertise.

We advise that **sufficient** ecological information has been provided to discharge the conditions 5 and 7.

Condition 9 has been submitted but it needs to be discharged at the same time as the BNG gain plan, to ensure the landscaping correlates with the BNG information. The biodiversity gain plan needs to be submitted.

Condition 12 (lighting) requires a lighting plan to be submitted detailing the positioning of the light fittings proposed.

Condition 5: Construction Ecological Management Plan. Prior to any landscaping works commencing on site a Construction Ecological Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority.

Reason: Provisions of a Construction Ecological Management Plan has been provided, detailing appropriate mitigation considerations for potential protected species and habitats within the area.

The CEMP has included species specific information and details of arboricultural protection measures, including fencing. We are satisfied that Condition 5 has been met.

Condition 7: Ecological Plan

Within 3 months of works commencing within the site an ecological plan must be submitted demonstrating that ecological enhancement features (including bat, bird and insect boxes) have been incorporated into the site and adjacent habitat. The plan must be implemented as proposed.

Reason - To ensure an acceptable standard of development upon completion through provision and long-term management of soft landscaping and to enhance local provisions for wildlife and biodiversity to mitigate habitat lost by development, in accordance with adopted Gravesham Local Plan Core Strategy Policies CS12 and CS19.

The enhancement plan includes a hedgehog dome, log/rubble pile, bat box and bird box. We are satisfied that a log pile would provide a feature to benefit insects and this should be used rather than a rubble pile. No instructions have been provided for the positioning of the bird and bat box. Therefore, we would like to highlight that it is recommended that bird and bat boxes are made from a durable material such as woodcrete. We recommend that bird boxes face preferably north to east or shaded from direct sunlight, and bat boxes/tubes should face south to southeast, and both bird and bat boxes/tubes should be positioned away from any artificial lighting. Bat boxes are recommended at 4m above ground if possible and birds boxes depend on species. More information is provided here for bird and bat box positioning

[Putting up a nest box | BTO](https://www.bats.org.uk/our-work/buildings-planning-and-development/bat-boxes/putting-up-your-box)

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In addition, native planting is to take place on the north-west of the site, including planting of primroses, common hazel, and common foxglove near retained treelines. Native planting should encourage pollinator and insect activity, adding to the biodiversity within the area.

If the applicant confirms to the LPA that they will follow the instruction above, we do not require to be reconsulted and are satisfied that condition 7 can be discharged.

Condition 9: Soft Landscaping

Prior to any part of the permitted dwellings being occupied or used, a scheme detailing the proposed soft landscaping scheme shall be submitted to and approved, in writing, by the

Local Planning Authority. The scheme shall then be carried out in full within the first planting season. Any trees or plants that die, are damaged, removed or become diseased within five years from implementation shall be replaced with a similar size and species during the next planting season.

Reason To ensure that the landscaping is maintained in the long term in the interests of the visual amenity of the site and biodiversity, in accordance with Policies CS12 (Green Infrastructure) and CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy (2014)

We note this application was subject to Biodiversity Net Gain and the application form for 20250937 noted this as applicable. A landscape plan has been submitted but we highlight that landscaping plans should be discharged at the same time as the BNG deemed condition, so the gain plan and finalised BNG documents can be cross referenced and discharged at the same time.

Deemed Condition

The development is subject to the deemed condition of planning permission relating to biodiversity gain as per Schedule 7A 13(1) of the Town and Country Planning Act 1990. The condition is that the development may not be begun unless—

- (a) a biodiversity gain plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The condition cannot be varied or removed. **An application must be made to discharge the biodiversity gain plan prior to works commencing.** The government's published Biodiversity Gain Plan (BGP) template should be used to discharge it: [Biodiversity gain plan - GOV.UK](#). Please note that the submission of the finalised Statutory Biodiversity Metric/BGP is required by law prior to the commencement of any development.

Condition 12:

No external lighting, whether temporary or permanent, shall be placed or erected within the site unless details are submitted to and approved in writing by the Local Planning Authority. Any details to be submitted shall be in accordance with the Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 8 Bats and Artificial Lighting', and shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) and an ISO lux plan showing light spill. The development shall be carried out in accordance with the subsequently approved details and maintained as such thereafter.

Reason: To limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation in accordance with paragraph 193(c) of the NPPF 2024

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'.

The LED light fitting specification provided is shown to be suitable with downward facing light only and warm light of 2700K, which is suitable. No PIR/timer are specified and we

advise these could be implemented or otherwise recommend lighting be switched off when not required or in use, to minimise lighting impacts.

No formal plan displaying individual lighting fixtures and the direction of light to the wider habitat has been provided. As such, we cannot determine the quantity of light fittings or the direction of the external lighting, and whether this would impact the wooded/tree and habitat areas surrounding the house, which could have negative effects on commuting or foraging protected species such as breeding birds or bats – especially as the planned ecological enhancements include bat and bird boxes.

Therefore, we cannot discharge condition 12 until an artificial lighting plan showing the locations of light fittings has been submitted.

Lucy McGinley
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Revised Site Layout Plan, Shakespeare Design Solutions Ltd., March26
- Construction Ecological Management Plan, EcoAssistant Ecologist Ltd., March26
- External Lighting Condition 12 Supplementary Information, April26
- Elevations with Lighting, Shakespeare Design Solutions Ltd., March26