



ECOLOGICAL ADVICE SERVICE

TO: *Alison Webster*

FROM: *Elizabeth Fagg*

DATE: *06 August 2025*

SUBJECT: *20250492 Shorne Mead, 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 documents for the discharge of conditions. We consider that sufficient information has been provided for the discharge of condition 5

We require the following further information for these conditions.
Condition 7

- a revised bat mitigation strategy is required

Condition 9

- a detailed lighting plan showing light fitting type, locations and light spill is required

Condition 13

- A revised Construction Environment Management Plan is required to include ecology

We have not provided comments for condition 3 Materials, 4 Hard landscaping and 14 Archaeology as these are not our area of expertise.

Condition 5

Following the demolition of the existing dwelling and prior to any ground works taking place, a soft landscaping scheme shall be submitted to and approved in writing by the plan shall be submitted to and approved in writing by the Local Planning Authority, detailing the following:

- The location of every tree on site, their species, the extent of crown spread and an assessment of their health and stability.*
- Details of those trees to be retained and those to be removed.*
- Details of hedgerow planting.*
- Details of additional native tree and shrub planting within the site to include their quantity, size and arrangements for aftercare.*
- Details of location for hedgehog boxes and log piles.*
- Details of how the development will enhance biodiversity to include outlined management measures to achieve the proposed habitat target conditions, native and wildlife-friendly planting, and integrated durable bat and bird boxes aimed at species of conservation concern.*

Any identified trees or plants that die, are damaged, removed or become diseased within five years from the first occupation of the dwelling hereby permitted shall be replaced with a species of a similar size and species during the next available planting season. The landscaping works shall be carried out in accordance with the approved details before any part of the development is brought into use 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 reviewed the revised landscaping submitted. All amendment recommended have been completed and we are satisfied with the information provided and the condition can be discharged.

Condition 7

Prior to the demolition of the house, a bat mitigation strategy based on the information within the Preliminary Ecological Appraisal (Bats) by Calumma Ecological Services, reordered to include the single tree mounted temporary bat box required as a temporary roost for any bats found during demolition as the first item, must be submitted to and approved in writing by the Local Planning Authority. The mitigation strategy must be implemented as approved unless varied by a European protected species licence issued by Natural England, and shall be maintained thereafter.

As previously commented, the preliminary ecological appraisal with the outline mitigation strategy has been resubmitted for this condition. This has not been changed to be reordered to have the underlined action above completed. The mitigation action that needs to be reorder is the following

- A single tree mounted bat box will be required as a temporary roost for any bats found during demolition, such as: • eco kent bat box (wildcare.co.uk)*

Condition 9.

Prior to the installation of any external lighting and prior to the first occupation of the dwelling (whichever is earliest), a detailed lighting plan to include the following:

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

must be submitted to and approved in writing by the Local Planning Authority. It must demonstrate that the lighting plan has been designed in accordance with Bat Conservation Trust's 'Guidance Note 8 Bats and Artificial Lighting' guidelines (or subsequent editions/updates) and the replacement bat roosts will not be impacted by artificial lighting. The plan must be implemented as approved and maintained thereafter.

As previously commented, some general narrative detail on lighting requirements has been provided on the landscaping plan, however, a detailed lighting plan has not been submitted, showing light fitting type, locations and light spill. As this property contains roosting bats and mitigation is required, we require the above further detail to discharge this condition.

Condition 13.

Prior to commencement of works (including site clearance), a construction environmental management plan (CEMP) will be submitted to and approved in writing by the local planning authority. The CEMP will be based on the recommendations in section 8.6 of the Preliminary ecological appraisal, Calumma, Oct 24 and Bat report, Calumma 30/4/24 and include the following:

- a) Risk assessment of potentially damaging construction activities;*
- b) The identification of biodiversity protection zones and the use of protective fences, exclusion barriers and warning signs;*
- c) Reference to the relevant, granted, protected species licences (e.g., bats) obtained in advance of site clearance/construction and any relevant mitigation measures required;*
- d) Practical measures (both physical measures and sensitive working practises) to avoid or reduce impacts during construction for bats, badgers, birds, dormice and hedgehogs (may be provided as a set of species or habitat-specific method statements);*
- e) The location and timing of sensitive works to avoid harm to biodiversity features;*
- f) The times during construction when specialist ecologists need to be present on site to oversee works;*
- g) Responsible persons and lines of communication;*
- h) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person, and;*

The approved CEMP will be adhered to and implemented throughout the construction period in accordance with the approved details.

The CEMP has been submitted and it includes some of the requirements for the condition 13, mainly focussing on pollution prevention. It also includes information on the root protection areas for the protection of trees. It states *Ecological considerations have been addressed by other parties*. This is not appropriate and does not meet the condition wording above for items c), d), e), f) and h).

It needs to have an ecology section where the mitigation for bats is listed, with reference to an ECoW, Natural England licencing requirements and other measures with timings for other species as listed in item d) of the condition. It should also reference other ecological documents as a good measure. We therefore require a revised document.

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:

- Preliminary ecological appraisal, Calumma, 23/7/24
- Proposal H20GEO, dated 28/3/25
- Landscape planting plan Rev 1, HW & Co, Apr 25
- Construction and environmental management plan, H20geo, Jul 25
- Site plan rev 1, Mark Carter Associates, Aug 23