



ECOLOGICAL ADVICE SERVICE

TO: Amanda Cue
FROM: Nancy Inman
DATE: 25 November 2025
SUBJECT: 90 Downs Road, Istead Rise 20250937

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: ADDITIONAL INFORMATION REQUIRED

We have reviewed the submitted ecological information and advise that further information is required in relation to baseline habitats. This is due to individual trees being present from a review of aerial and street imagery, however not being shown on the baseline habitats plan or within the BNG metric. We also require further information as to whether Ground Level Tree Assessments (GLTAs) for roosting bats have been undertaken on these trees, as they appear to be mature/semi-mature.

There will be some small loss of bramble scrub, which has potential to support nesting birds and links to woodland with suitability for dormice. It is considered that so long as woodland and PRF-I trees are retained as outlined within the post-development habitats plan, and as long as grassland is managed in its current short sward, that impacts to protected species as a result of proposals can be avoided through the implementation of sensitive working methods without the need for further survey. This is dependent on the results of the GLTA as referenced above. To summarise we require the following prior to determination:

- Ground Level Tree Assessment (bats) on trees identified for removal

- BNG baseline revisions for all trees within centre/east of the site that will need to be removed (or have already been removed)

BATS

Three trees within the northern woodland have been identified as PRF-I as outlined within the Preliminary Ecological Appraisal (EcoAssistance, Aug 25). These appear to be retained, and no further survey is necessary. It is not clear whether a GLTA has been undertaken on the individual trees present across the site as shown below. The results of this are required prior to determination, as their removal will be required to facilitate the development footprint.



Fig 1. Street view of site

BASELINE HABITATS

The BNG metric shows habitats onsite to consist primarily of modified grassland, with small patches of introduced shrub, bramble and lowland mixed deciduous woodland. As acknowledged within the PEA, the entire site is mapped as woodland, however the woodland edge only covers a small section of the western site boundary. A number of individual trees appear to be present across the site as shown below in Fig 2.



Fig 2. Aerial of site

The PEA and BNG report/metric have not referenced these trees, and it is not clear whether they have therefore already been removed. If they have been removed, then it appears to have been done post-2020 and therefore they still must be included within the BNG baseline in line with the BNG guidelines. If trees are no longer present then a 'good' condition score and precautionary assessment should be given as to their DBH, as a full survey will no longer be possible.

We are satisfied that the post-development habitats have been accurately recorded, however it is likely that the net loss on site will be larger than 0.05 units as currently shown, if the individual trees in the east of the site are taken into consideration. An updated metric and baseline habitats plan will need to be submitted to reflect these comments.

Nancy Inman
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Preliminary Ecological Appraisal (EcoAssistance, Aug 25)
- Biodiversity Net Gain Metric and Report (EcoAssistance, Aug 25)