



ECOLOGICAL ADVICE SERVICE

TO: Wendy Simpson
FROM: Nancy Inman
DATE: 24 October 2025
SUBJECT: Land NW Of Factory Rd, Northfleet 20250550

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 PROVIDED

Habitats onsite have limited value for protected species, having been recently cleared. Some young trees are present which may offer potential for nesting birds, though are of negligible potential to support roosting bats. Species such as hedgehog, reptiles and amphibians may be present within the surrounding area and may occur incidentally onsite. Recommendations have been provide to prevent adverse impacts to these species during the construction phase.

The BNG assessment (AAe, May 25) demonstrates an overall net gain of 0.0334 habitat units (+17.61%) onsite. No offsite habitat creation is required and these gains are not considered significant.

PRECAUTIONARY WORKING METHODS

Suggested Condition Wording:

1. *Habitats shall remain managed in their current condition up until the commencement of development to prevent increased suitability for protected species.*

2. *Any trees to be retained, including its roots, shall be protected from damage in line with The British Standard "Trees in Relation to Design, Demolition and Construction to Construction - Recommendations" (BS 5837) (2012);*
3. *Any required clearance of tall/dense vegetation with potential to support reptiles should be undertaken in two stages, with a first cut to 150mm, followed by a second cut several days later to ground level;*
3. *Brash, rubble and log piles to be relocated shall be dismantled by hand. Where these are suitable for hibernating reptiles/hedgehog, removal shall be conducted outside of the hibernation period (November – February);*
4. *Backfilling of trenches and other excavations shall be undertaken before nightfall, or a ramp shall be left to allow any animals to easily exit;*
5. *All excavations and trenches shall be checked each morning throughout the construction period and prior to infilling;*
6. *All temporarily stored building materials (that might act as temporary resting places) shall be isolated within hardstanding areas and raised off the ground, e.g. on pallets.*
7. *Any work to vegetation/structures that may provide suitable nesting habitats should be carried out outside of the bird breeding season (1st March to 31st August inclusive) to avoid destroying or damaging bird nests in use or being built. If vegetation/structures need to be removed during the breeding season, mitigation measures need to be implemented. This includes examination by a suitably qualified and experienced ecologist immediately prior to starting work. If any nesting birds are found, works must cease until after the birds have finished nesting.*
8. *If at anytime a protected species is discovered within the works area all works must stop while a suitably qualified ecologist and/or Natural England are consulted. Works shall not resume until any required surveys and/or mitigation are completed.*

ARTIFICIAL LIGHTING

Lighting in the vicinity of a bat roost or along commuting / foraging routes could constitute an offence both to a population and to individuals. Artificial lighting has been shown to be particularly harmful to bats along river corridors, near woodland edges and near hedgerows¹. Local authorities have a duty to ensure impacts upon legally protected species are avoided and impacts upon bats are a material consideration in any planning permission under the Natural Environment and Rural Communities (NERC) Act 2006 and through the NPPF 2024.

Therefore, to mitigate against potential adverse effects on biodiversity, the Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 8 Bats and Artificial Lighting at Night' (or subsequent updates) should be consulted in the lighting design of the development.

We advise that the incorporation of sensitive lighting design for biodiversity is submitted to the local planning authority and secured via an attached condition with any planning permission.

Suggested Condition Wording:

¹ Bats and Artificial Lighting guidance. Available [here](#).

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.

Reason: To limit the impact of light pollution from artificial light in accordance with the NPPF 2024, paragraph 198(c). With consideration for bats and other nocturnal wildlife in accordance with the NPPF 2024, paragraph 187(d).

BIODIVERSITY NET GAIN

In response to our previous request, the applicant has confirmed that habitat clearance works undertaken on site were done so as part of EDC/16/0004, and were therefore undertaken lawfully. We are therefore satisfied that the baseline information as detailed within the Biodiversity Net Gain Technical Note and Metric (AAe, May 25).

Baseline habitats comprise artificial unvegetated unsealed surface, developed land – sealed surface, and introduced shrub with some immature trees. Post-development habitats will be largely the same, however will include new tree planting (5 x small trees). A net gain of 0.0334 habitat units (+17.61%) is anticipated. No hedgerows are currently present onsite, and an additional 0.0454 hedgerow units are proposed.

Habitat creation onsite is not considered to be significant, given the small unit uplift and the limited scale of medium distinctiveness habitat creation. There is therefore no requirement for 30 years of management and monitoring with LPA oversight. We suggest that any habitat creation measures contributing towards BNG onsite are secured through the production and implementation of a Biodiversity Gain Plan and a Landscape and Ecological Management Plan.

BIODIVERSITY GAIN PLAN

Suggested Condition Wording:

The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the Biodiversity Net Gain metric (AAe, May 25).

Reason: To ensure the proposals are in accordance with details submitted and considered as part of the planning application, in accordance with [insert relevant policy].

The above condition is not a statutory requirement but unless imposed there would be no requirement that the Biodiversity Gain Plan submitted for approval to be in accordance with any biodiversity or ecological information submitted with the planning application. This condition may not be appropriate for some outline planning permissions where the post-development biodiversity value will not be known until reserved matters have been approved.

LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

Suggested Condition Wording:

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 (AAe, April 25) and the Biodiversity Net Gain (BNG) report and Metric (AAe, May 25) associated with the planning application and shall include details of the following:

- a) Habitat creation measures for all creation and enhancements contributing towards BNG onsite*
- b) A full planting schedule utilising primarily native species;*
- c) Details (specifications and locations) of the incorporation of biodiversity enhancement features (e.g. bird and bat boxes) as recommended within the PEA (AAe, April 25)*
- d) Rolling, long-term maintenance measures covering up to a 30-year period; and*
- e) Details of responsible persons.*

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

Reason: To protect and enhance biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

EVIDENCE OF IMPLEMENTATION – LEMP

Suggested Condition Wording:

Within twelve months of first use of the development hereby approved, photographic evidence of the implementation of such habitat creation and biodiversity enhancement measures as are required by condition X (the LEMP condition) shall be submitted to the local planning authority for approval. The approved measures shall be thereafter retained.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Nancy Inman
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Biodiversity Net Gain Technical Note and Metric (AAe, May 25)
- Preliminary Ecological Appraisal (AAe, April 25)

