



ECOLOGICAL ADVICE SERVICE

TO: Rebecca Harrison

FROM: Elizabeth Fagg

DATE: 23 December 2025

SUBJECT: 20251224 Bluebells, Willow Walk

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 provided for the approval of conditions 7, 8, 9, 10, 11, 12 and 13 attached to planning permission reference number 20250971.

We have sufficient information to discharge condition 11 (CEMP).

We require further information for conditions 9 and 12

- **Revised maintenance schedule without reference to weedkiller and spraying.**

We the following information for condition 10

- **A revised lighting plan, to avoiding lighting the proposed boundary hedgerows.**

We have not commented on Conditions 7, 8 and 13 as they are not our area of expertise

Condition 9.

Prior to above ground works, and notwithstanding the details shown on the approved plans, submitted documents and application form, a scheme detailing the proposed soft landscaping shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include the type and species of planting to be carried out, to include their quantity and size as well as arrangements for aftercare. Thereafter, the

approved soft landscaping scheme shall be carried out in full during the first available planting season following first occupation of the development. Any trees or plants that die, are damaged, removed or become diseased within five years from the date that the development is first brought into use shall be replaced with a species of a similar size and species during the next available planting season.

A soft landscape plan has been provided with quantity species and size for trees and percentages of mix for the native species hedge and native species planting bed. We highlight that the native species planting bed is located to the west of the plot by Willow Walk and it includes some non-native species such as hydrangea and heuchera, also with 'verbena' species which can be non-native, dependant on species. As these can be valuable for pollinators and are not in the ancient woodland buffer zone this is appropriate.

The soft landscape maintenance schedule details weedkiller application (3.3.3 & 3.4.3) and crown spraying specimen trees when required (3.3.1), also listed within schedules 2 & 3. We consider due to the proximity of the ancient woodland that neither of these actions are appropriate and need to be removed from the maintenance schedule.

We note the schedule also includes bulb planting which is not shown on the plan and we recommend this is added to the plan if it is to be used, with bulb species.

We require a

- **Revised maintenance schedule without reference to weedkiller and spraying.**

Condition 10.

Prior to first occupation of the development hereby approved, a lighting design plan(s) for biodiversity shall be submitted to and approved in writing by the Local Planning Authority. The plan(s) shall include the following:

- *the identification of areas/ features on-site where disturbance could occur to biodiversity features such as ancient woodland plus buffer zone and bat roosting sites and/ or foraging/ commuting routes;*
- *the provision of appropriate, scaled plans(s) to show how and where external lighting shall be installed;*
- *the provision of technical specifications for the external lighting; and*
- *the provision of lighting contour plans to show expected lux levels on both the horizontal and vertical planes, so that it can be clearly demonstrated that areas to be lit shall not disturb the activity or relevant ecological receptors.*

All external lighting shall be installed prior to first occupation of the dwellings in accordance with the specifications and locations set out in the plan(s), and these shall be maintained thereafter in accordance with the plan(s).

A lighting plan has been provided and it details light fittings that avoid upward lighting which is appropriate. We consider that the lighting to the east of the site is appropriate, with lux levels shown and does not impact the ancient woodland and buffer zone. However, the lighting (EX3 MH1) at the front of the proposed buildings is shown to be impacting the proposed native hedgerows to the site boundaries (north west corner of plot A and south west corner of plot B). We suggest the light fittings in these positions are moved away from these corners to avoid lighting the proposed hedgerows.

A revised lighting plan is required to avoid lighting the proposed hedgerows.

Condition 11.

Prior to the 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 the Preliminary Ecological Appraisal, Calumma Ecological Services Oct 24 and include the following:

- a) the purpose and objectives for proposed mitigation works during construction;*
- b) the identification of biodiversity protection zones and the use of protective fences, exclusion barriers and warning signs;*
- c) a detailed method statement to protect the ancient woodland (AW), 15m AW buffer zone and retained trees from pollution and adverse impacts;*
- d) the extent and location of proposed mitigation works shown on appropriate scale maps and plans, with reference to: pollution avoidance measures (noise, dust, lighting and run-off), protection of retained trees and hedgerows;*
- e) practical mitigation measures (both physical measures and sensitive working practices) to avoid or reduce impacts during clearance and construction for bats, hedgerows and breeding birds (may be provided as a set of species or habitat specific methods statements);*
- f) the location and timing of sensitive works to avoid harm to biodiversity features; g) the times during construction when specialist ecologists need to be present on site to oversee works;*
- h) responsible persons and lines of communication.*

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

The CEMP details pollution control and measures to protect the ancient woodland and fencing requirements. It refers to the preliminary ecological appraisal in appendix a, but it is not attached. This has been submitted separately and we recommend that it is good practise is to refer to the ecology requirements in the CEMP so the information is in one reference document, but acknowledge that as the ecological report has been noted that **sufficient information has been provided to discharge this condition.**

Condition 12.

Within three months of work's commencement, a detailed plan(s) showing how the development will enhance biodiversity, will be submitted to, and approved in writing by, the Local Planning Authority. This will include a detailed landscaping plan using native species, planting plan with management measures, hedgehog highways and integrated wildlife features, including durable bat and bird boxes aimed at species of conservation concern. The approved measures will be implemented and retained thereafter.

We are satisfied that bat and bird boxes, hedgehog features and insect log piles have been planned, and sufficient detail has been given for those features.

The plan details mainly native species planting. As noted above for condition 9, we require a revised maintenance plan as it includes the use of sprays and weedkiller which could be detrimental for biodiversity and ancient woodland and buffer zone.

We require a

- **Revised maintenance schedule without reference to weedkiller and spraying.**

Elizabeth Fagg
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Proposed site block plan Rev G, Steve Baker Architect
- Soft Landscape Maintenance Schedule, Steve Baker Architect
- Preliminary ecological appraisal, Calumma Ecological Services, 16/10/24
- Lighting plan, Kingfisher Lighting, 25/11/25