



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 conditions 5, 7, 13

We require the following further information.

Condition 9

- **a detailed lighting plan showing bat box and tube locations, with no impacts from lighting to those or the native planting, hedgerows and trees.**

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

We have previously reviewed the revised landscaping plan and we commented that 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.

A revised Bat Survey Report with the outline mitigation strategy has been resubmitted for this condition. Photographic evidence has been provided that the tree mounted temporary bat boxes have already been implemented. **We are satisfied that sufficient information has been provided to discharge condition 7** and the mitigation strategy should be implemented as approved unless varied by a European protected species licence issued by Natural England, and shall be maintained thereafter.

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 requested, a detailed lighting plan has been submitted with light spill and fittings shown. However, as this property contains roosting bats and mitigation is required with the bat survey stating that at least 2 bat tubes should be installed in the south west elevations, away from artificial light sources. We do not have the location of the tree mounted temporary bat boxes or the location of the building integrated bat tubes on the provided documents. At present it is likely that these have artificial lighting affecting them. We require them to be shown on the lighting plan so we can check that the light spill to those bat features is under 1 lux.

The bat report correctly states '*Lighting should be directed away or shielded from any green areas/woodland/hedgerows, and bat boxes/roost access points to allow bats safe foraging routes where they will not be visible to predators.*'

We also consider that a number of areas of native planting/hedgerows/trees are also impacted above 1 lux which does not align with the bat report recommendations above. We understand that there will be a need for some security/safety lighting but require lighting of vegetation is minimised.

We require a revised plan showing bat boxes and tube locations and avoidance of light to those and native planting, hedgerows and trees.

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.

We previously requested a revised CEMP to include an ecology section with relevant timings, licences and Ecological clerk of works information. This has been updated and provided. **We are satisfied that sufficient information has been provided and condition 13 can be discharged.**

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
- Bat survey report, Calumma, Rev 2 21/8/25
- CEMP, H20geo, 3/9/25
- Luminaire schedule, Darke and Taylor
- Lighting layout, Darke and Taylor, 3/9/25
- Lighting spill, Darke and Taylor, 3/9/25