



ECOLOGICAL ADVICE SERVICE

TO: Amanda Cue
FROM: Emma England
DATE: 20 January 2026
SUBJECT: 20251242 / Land at Former Northfleet Cement Works, Northfleet

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.

CONDITION DISCHARGE

We have reviewed the submitted documents in relation to condition 13 of permission 20220226 and advise the following changes to maximise the chance the boxes will be used, and to avoid any welfare issues in relation to nesting birds:

- Removing the bird boxes from the plans. Bird boxes, especially open fronted boxes are unlikely to be used when placed on exposed poles. Bird boxes on exposed poles also risk over-exposure to the sun which could result in any chicks inside dying¹;
- Using a bat box(es) specifically designed for pole mounting with plans ideally reflecting the change. The bat boxes chosen are poorly designed for use on poles. See examples of pole mounted boxes including the poles here: [Pole Mounted Maternity Bat Box | NHBS Practical Conservation Equipment](#).

¹ On page 26 of the BTO 2018 book titled 'Nestboxes: Your Complete Guide' by David Cromack, it states: "...prolonged exposure to the sun's heat can cause young chicks within a nestbox to overheat and die. The book also advises that angling the entrance hole in a northerly or easterly direction is good, especially in more exposed locations as these are usually facing away from prevailing wind and rain.

Condition 13 states:

“The development hereby approved shall not be brought into use until a scheme for providing bat roosting opportunities at the site, in line with the recommendations of the Ecology Technical Note (AAe May 2022) has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented in full prior to the development hereby approved being brought into use.

Reason: *In order to enhance the biodiversity of the site in accordance with adopted Local Plan Core Strategy Policy CS12 of the Gravesham Local Plan: Core Strategy (September 2014)”.*

Emma England
Biodiversity Officer

This response was submitted following consideration of the following documents:

AAe (June 2022) Ecology Technical Note. Northfleet Embankment West, Dartford – Temporary Access to Sales Suite Off College Road.

BDG Design (South) Ltd (December 2025) Sales Area / Access Road Bird and Bat Box Locations. HV1B_ARCH_902 C1.