



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher

FROM: Emma England

DATE: 29 January 2026

SUBJECT: 20251176 / 24 St Georges Crescent, 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.

SUMMARY: ADDITIONAL INFORMATION REQUIRED

We understand proposals to comprise the change of use of a dwellinghouse to a Children's Residential Care Home. The change is to include a single storey rear extension and internal alterations.

We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. The following information is required prior to determination:

- Further information concerning the area (in square metres) of lawn/vacant/derelict land to be lost from the site, compared to the amount of new building and hardstanding areas proposed; and
- High resolution photographs of the entire area of the external parts of the building to be affected by works.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications¹ for development (unless exempt^{2,3}), must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Within the application form, the red line boundary for the site is stated to be 289 square metres in size.

The applicant has claimed an exemption from biodiversity net gain (BNG) (de minimis). For the de minimis exemption to apply, the following must be true for this application:

- The development will not impact any on-site priority habitat; AND
- The development will not impact more than 25 square metres of on-site habitat with a biodiversity value greater than zero⁴; AND
- The development will not impact more than 5 metres of on-site linear habitat.

We cannot see that any linear habitat will be affected, and there is no on-site priority habitat. However, insufficient information is available to confirm that the development will not impact more than 25 square metres of on-site habitat with a biodiversity value greater than zero.

We have undertaken a rapid assessment, and find that it is possible that these proposals could fall above the threshold for the de minimis exemption from mandatory 10% BNG. Therefore, a mandatory 10% biodiversity net gain could apply to this application, unless another exemption is found to apply.

Exact calculations regarding the amount of habitat to be lost from the site have not been provided. We would recommend that the applicant submit further information to clarify the area of additional hardstanding and buildings to be created as a result of the scheme, compared to the amount of lawn/vacant/derelict land to be lost as a result of proposals.

Any application which is required to achieve a 10% BNG must submit the following information as a minimum:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), [either on the date of application or earlier proposed date \(as appropriate\)](#);

¹ All planning applications for major development (unless exempt) submitted on or after 12th February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2nd April 2024.

² Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

³ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

⁴ N.B: Habitats with a biodiversity value of zero include: buildings, hardstanding, unvegetated garden, and artificial unvegetated; unsealed surface. Please note that bare ground, vegetated garden and vacant/derelict land will attract a biodiversity value greater than zero within the metric.

- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ([‘degradation’](#)), and where they have:
 - a statement to the effect that these activities have been carried out;
 - the date immediately before these activities were carried out;
 - the pre-development biodiversity value of the onsite habitat on this date;
 - the completed metric calculation tool showing the calculations, and
 - any available supporting evidence of this;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Whilst a completed metric demonstrating a 10% net gain is not required for validation or determination of a planning application, the government’s standing advice on BNG states (under paragraph 002 Reference ID: 74-002-20240214): *“[BNG] is not just a post-permission matter. To ensure the biodiversity gain objective is met and the condition can be discharged successfully, it is important biodiversity net gain is considered throughout the planning process.”*

To this end, it is therefore good practice to submit (in addition to the above):

- An illustrative on-site soft landscaping plan and outline landscape and ecological management plan/habitat management and monitoring plan that has been taken into account within the biodiversity metric calculation tool;
- Clear consideration of the principle of additionality within the biodiversity metric calculation tool;
- A biodiversity net gain design stage report clearly setting out how the biodiversity gain hierarchy has been applied and describing any significant on-site enhancements;
- If off-site biodiversity net gain provision is required, as a minimum, as a minimum, the need should be reported, with relevant necessary compensatory habitats discussed in a biodiversity net gain design stage report, and information provided regarding discussions with off-site providers; and
- A draft biodiversity gain plan.

Ecological Impact Assessment

It is noted that proposals are very small in scale. However, from the information provided, it has not been possible to entirely scope out impacts to roosting bats.

To establish the potential for protected species presence which must be taken account of in the planning decision, in the first instance, high quality, labelled photographs of the building where the extension is proposed be requested. These photographs should show all areas of the building to be affected by external works, and avoid any shading or poor resolution that could hinder our review of the building's potential suitability for roosting bats. These photographs may provide sufficient confirmation that no ecological surveys are necessary. However, where photographs are inconclusive, or indicate possible features suitable for protected species, an Ecological Impact Assessment (EclA) may need to be undertaken by a suitably qualified ecologist.

Emma England **Biodiversity Officer**

This response was submitted following consideration of the following documents:

Anwar, A. (November 2025) PP-14495721. 24 St Georges Crescent, DA12 4AR. Gravesham Borough Council, Application for Planning Permission.

Livarch (Undated) Livarch24 SGC/111. 24 St George Crescent, Gravesend, Gravesham, DA12 4AR.

Livarch (November 2025) Livarch/24SGC/101. Existing and Proposed Plans. 24 St George Crescent, Gravesend, Gravesham, DA12 4AR.