



## ECOLOGICAL ADVICE SERVICE

**TO:** Amanda Cue  
**FROM:** Elizabeth Fagg  
**DATE:** 08 November 2024  
**SUBJECT:** 20240831 / Manor Hotel, Gravesend

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*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.*

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### **NO INFORMATION – NO FURTHER INFORMATION REQUIRED**

No ecological information has been submitted with this application. As a result of reviewing the data we have available to us, and the information submitted with the planning application, we advise that the proposed development has limited potential to result in significant ecological impacts. We have taken this view due to the application is for an area with hardstanding. As such, we are satisfied that there is no requirement for an ecological survey to be carried out at this time<sup>1</sup>.

This application has not provided biodiversity net gain (BNG) information and from the information provided this application appears to impact less than 25m<sup>2</sup>, and if the LPA are satisfied this is correct, this application is exempt from BNG.

### **Biodiversity Net Gain (BNG)**

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications received in England (with a few exemptions) must deliver at least a 10% biodiversity net gain (BNG) from the 12th February 2024 and all minor applications from the 2nd April 2024.

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<sup>1</sup> We consider we have taken a proportionate approach to ensure that the provision of information within the planning application is appropriate to the environmental risk associated with the development and its location in line with Clause 4.1.2 of BS42020 (BSI, 2013).

The design and access statement has stated that part of the proposal is to redevelop the overspill car park to provide an area with containers. We have reviewed the information, and this area is stated as hardstanding and existing trees and scrub will be used for screening, and as such we anticipate there is no vegetated habitat loss to occur. The BNG de minimis exemption applies when habitats less than 25m<sup>2</sup> are impacted. If this assumption is incorrect, regarding the impacts to the area proposed for the containers, and vegetation removal works affecting habitats are required for this application, then a BNG metric and baseline habitat information will be required.

### **Enhancements**

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 180 and 186 of the National Planning Policy Framework (NPPF) 2023, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for avoidance, mitigation and compensation. As such, we advise that an enhancement plan is provided that includes the ownership and responsibilities for future management of the enhanced areas, and a condition wording is suggested below.

*Within three months of works commencing, an enhancement plan showing how the development will enhance biodiversity, will be submitted to, and approved in writing by, the local planning authority. This will wildlife features, such as durable bird boxes, of woodstone or similar material, aimed at species of conservation concern. The approved measures will be implemented and retained thereafter.*

Appendix 1 provides some generic (non-exhaustive) information regarding the most common enhancements we see proposed. To provide a view regarding the potential ecological benefits of any project, in line with relevant legislation and planning policy, we require sufficient detail to be submitted. Without sufficient detail we are unable to provide an opinion regarding the suitability of any proposed measures. Suitable detail may include the provision of information such as:

- The proposed target species;
- Make and model of any boxes;
- Location information such as height, aspect, surrounding habitat;
- Detailed planting schedules; and
- Relevant management necessary to ensure the habitat is suitable for the target species.
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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:

- Design and access statement, DAC Architects, Aug 24
- Site location plan and block plan, DAC Architects, 3/6/24

## Appendix 1: Ecological Enhancement Measures

| Possible Biodiversity Enhancements | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| Provision of ready-made bird boxes | <p><b>Suitability:</b> All development.</p> <p><b>Location:</b> Semi-mature/mature trees, buildings</p> <p>To provide a long-term ecological benefit for the site, boxes will need to be correctly sited:</p> <ul style="list-style-type: none"> <li>• Be away from windows and doors;</li> <li>• Be at the appropriate height for the target species and erected in accordance with the manufacturer guidelines;</li> <li>• Be sheltered, and sited on a northern or eastern facing aspect;</li> <li>• The boxes should be away from artificial light sources.</li> <li>• If siting on a tree, place the box in a way that avoids damaging the tree, and select a mature or semi-mature specimen; and</li> <li>• There should be a clear flight path to the box, so vegetation should not clutter the box entrance.</li> </ul> <p><b>Material:</b> Wall or tree-mounted woodcrete or building integrated boxes are generally recommended for development projects over wooden boxes.</p> <p>Wooden boxes are only likely to last 5-10 years before needing to be replaced to continue to provide a wildlife benefit. A woodcrete box has a much longer lifespan of 20-25 years before needing to be replaced. We would always recommend durable materials be selected for installation to minimise maintenance in the long-term and to provide a longer-term assurance of biodiversity net gain in line with the NPPF 2023.</p> <p><b>Maintenance:</b> Many bird boxes need clearing out at the end of the nesting season. The manufacturer can provide relevant information as well as the Royal Society for the Protection of Birds (RSPB)<sup>2</sup> and British Trust for Ornithology (BTO)<sup>3</sup>.</p> |

<sup>2</sup> [How To Clean a Bird Nesting Box - The RSPB](#)

<sup>3</sup> [Putting up a nest box | BTO - British Trust for Ornithology](#)

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| <p>Provision of bat boxes/bricks/tubes/tiles or bat roosting spaces within the new buildings</p> | <p><b>Suitability:</b> Most development.</p> <p><b>Location:</b> Semi-mature/mature trees, buildings</p> <p>To provide a long-term ecological benefit for the site, boxes will need to be correctly sited:</p> <ul style="list-style-type: none"> <li>• Be away from windows and doors or any features that might allow access to cats;</li> <li>• Be at the appropriate height (ideally 4-5m high) and erected in accordance with the manufacturer guidelines.</li> <li>• Be sheltered, and with the majority sited on a southerly facing aspect;</li> <li>• The boxes and a flight path to the box should be unlit;</li> <li>• A clear flight path to the box is needed, so vegetation should not clutter the space around the box; and</li> <li>• On trees, only mature or semi-mature specimens should be chosen.</li> </ul> <p><b>Material:</b> Wall or tree-mounted woodcrete or building integrated boxes are generally recommended for development projects over wooden boxes.</p> <p>Wooden boxes are only likely to last 5-10 years before needing to be replaced to continue to provide a wildlife benefit. A woodcrete box has a much longer lifespan of 20-25 years before needing to be replaced. We would always recommend durable materials be selected for installation to minimise maintenance in the long-term and to provide a longer-term assurance of biodiversity net gain in line with the NPPF 2023.</p> <p><b>Maintenance:</b> Bat boxes should only be checked by a suitably licensed individual to avoid breaches of legislation.</p> |
| <p>Provision of space for solitary bees</p>                                                      | <p><b>Suitability:</b> Most development.</p> <p><b>Location:</b> Building integrated or wall-mounted</p> <p>Bricks or boxes for solitary bees need to be correctly sited in a warm, sunny spot. The box should be near vegetation, but vegetation should not clutter the entrances. Place at least 1m from ground level. The box should not sway in the wind or easily become dislodged. Avoid where possible using single large hotels. Instead use lots of smaller ones spaced around the site.</p> <p><b>Material:</b> Woodcrete boxes and building integrated boxes are generally recommended for development projects over wooden/other boxes. Although, as some sources recommend regular maintenance of solitary bee hotels, provided</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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|                                                                | <p>there is a commitment to regular maintenance, less durable boxes can be acceptable.</p> <p><b>Erection:</b> Follow the manufacturer guidelines.</p> <p><b>Maintenance:</b> See <a href="http://www.bumblebeeconservation.org/bee-nest-boxes/">www.bumblebeeconservation.org/bee-nest-boxes/</a>. And <a href="#">here</a>.</p>                                                                                                                                                                                                                                                                              |
| Provision of hedgehog holes in fencing                         | <p><b>Suitability:</b> Many developments.</p> <p><b>Location:</b> Base of fencing</p> <p><b>Construction:</b> 13cm x 13cm gaps at the base of fencing to allow hedgehog access to all garden areas. To reduce the risk of the holes being blocked by future residents, a sign above the hole is recommended as shown on the <a href="#">hedgehog street website</a><sup>4</sup>.</p>                                                                                                                                                                                                                           |
| Provision of hedgehog nesting boxes                            | <p><b>Suitability:</b> Many developments.</p> <p><b>Location:</b> Tucked away under a hedge, in shrubbery or near a wall in a quiet, sheltered place. Place the box where it will not flood after heavy rain.</p> <p><b>Material:</b> Woodcrete boxes are generally recommended for development projects over wooden/other boxes. Boxes should have a tunnel entrance or internal dividing wall to reduce risk of predators getting to the hedgehogs inside.</p> <p><b>Maintenance:</b> See information provided by Hedgehog Street<sup>5</sup> or The British Hedgehog Preservation Society<sup>6</sup>.</p>  |
| Provision of hibernacula (for great crested newts or reptiles) | <p><b>Suitability:</b> For larger sites with suitable habitats such as hedgerows and long grassland.</p> <p><b>Location:</b> A sunny position on a well-drained site, not prone to flooding. One of the long sides should be south-facing. Should be placed in a patch of suitable habitat such as tussocky grassland with minimal public disturbance.</p> <p><b>Material and construction:</b> For reptiles at least 4m long, 2m wide and 1m high and for great crested newt at least 2m long, 1m wide and 1m high. On free-draining soils, locate below ground level by excavating a pit or trench, then</p> |

<sup>4</sup> [Link your garden with a hedgehog highway \(hedgehogstreet.org\)](http://hedgehogstreet.org)

<sup>5</sup> <https://www.hedgehogstreet.org/cleaning-out-boxes/>

<sup>6</sup> [Hedgehog Homes \(britishhedgehogs.org.uk\)](http://britishhedgehogs.org.uk)

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|                                                                                                                        | <p>infilling with a mixture of topsoil and rubble, sleepers, logs, etc. For ideas on the design and construction of suitable hibernacula, see <a href="#">here</a>.</p> <p><b>Maintenance:</b> Hibernacula should be left undisturbed. Where log filled hibernacula deteriorate over time, to maintain habitat provision, consider building new ones.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Provision of log piles (for invertebrates, but could also benefit other species e.g., amphibians, reptiles, hedgehogs) | <p><b>Suitability:</b> For sites which can provide the right location and surrounding vegetation.</p> <p><b>Location:</b> Wood in direct contact with the ground, in dappled shade. Can be placed in shrub beds, edge of woodland, near hedgerows, in long grassland etc.</p> <p><b>Material and construction:</b> Logs at least 100mm thick with the bark still attached, and from native hardwood species. Lay stacks of logs on their side in compact piles to maintain humidity. To prevent the logs rolling, drive a stake into the ground on either side of the pile.</p> <p>Can also partially bury logs vertically in the ground to an approximate depth of 450 to 500mm. Use logs of different diameters and length and bury them side-by-side to form a pyramid<sup>7</sup>.</p>                                                                                                                                                                                                                                                                                     |
| The creation of ponds                                                                                                  | <p><b>Suitability:</b> Many developments.</p> <p><b>Location:</b> Place away from the root protection area of trees and risk excess leaf litter. Ideally have some longer vegetation and log piles around the edge of the pond, and this connected to suitable habitat in the wider environment. This will encourage the movement of wildlife to and from the pond.</p> <p><b>Construction:</b> For maximum benefit to wildlife, the pond should be left to colonise naturally (if in a good location for it to do so) or planted with native, local provenance plants and include no fish. Consider what to do with the spoil removed from the pond (avoid placing topsoil in a location where sediment run-off to the pond could occur). Spoil could be used in the construction of other wildlife features such as hibernacula.</p> <p>Create varied depths in the pond: shallow margins and areas that allow any animals that get into the pond to escape, deeper areas, at least 600mm in the middle of the pond. Where planting up, allow for submerged and emergent</p> |

<sup>7</sup> [Build-a-log-pile-for-stag-beetles.pdf \(ptes.org\)](#)

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|                                                 | <p>vegetation.</p> <p><i>How to build a wildlife pond guide:</i><br/> <a href="http://www.froglife.org/wp-content/uploads/2013/07/JAW2014-for-printing-HLF1.pdf">http://www.froglife.org/wp-content/uploads/2013/07/JAW2014-for-printing-HLF1.pdf</a><br/> <a href="https://freshwaterhabitats.org.uk/pond-clinic/create-pond/">https://freshwaterhabitats.org.uk/pond-clinic/create-pond/</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Provision of native/ wildlife-friendly planting | <p><b>Suitability:</b> Most development.</p> <p><b>Native Species:</b> An RHS study found that the best way to support invertebrates in gardens and promote a healthy ecosystem, is to choose plantings biased towards British native plants, and encourage dense vegetation, although leaving some areas of bare soil<sup>8</sup>.<br/> <a href="https://www.rhs.org.uk/advice/profile?pid=848">https://www.rhs.org.uk/advice/profile?pid=848</a> or <a href="https://www.britishflora.co.uk">https://www.britishflora.co.uk</a></p> <p><b>Hedgerows:</b> As far as possible, hedgerows should be connected to high-quality habitats to improve species movement. To maximise any potential wildlife benefit long-term, species-rich (containing at least 5 different species) native hedgerows should be prioritised and be managed sympathetically for wildlife. They should have a target height and width of at least 1.8m by 1.8m. A native hedgerow consisting of a single species, managed to 1m high by 1m wide and cut every year will likely provide very limited ecological benefit in comparison.</p> <p>Hedgerows should ideally be managed sensitively on a three year rotation, with cutting avoiding the bird breeding season and retaining at least some winter fruit/berries (see <a href="#">here</a>).</p> <p><b>Establish climbing plants on walls and other vertical structures:</b> Where space is limited, climbing plants can provide increased wildlife benefit within the space available.<br/> <a href="#">Climbing Plants &amp; Wall Shrubs - The RSPB</a></p> |

<sup>8</sup> [Plants for Bugs - RHS science projects / RHS Gardening](#)