



ECOLOGICAL ADVICE SERVICE

TO: Alison Webster
FROM: Luke Wallace
DATE: 27 January 2023
SUBJECT: 20221328 / Bowling Green, 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 whether sufficient and appropriate ecological information has been provided to assist in its determination. 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 are sceptical of the estimated biodiversity net-gain. Firstly, without the full excel calculations and condition assessments, we cannot assume the estimated the 31.68% increase in habitat units is accurate as the proposed building, hardstanding and landscaping will replace much of the site's vegetation. This lack of understating is compounded by a lack of an ecological assessment.

Secondly, we highlight that the 'net-gain' will rely heavily on the effective establishment and management of proposed features like the wildflower grassland – it appears no establishment and management proposals have been disclosed.

Thirdly, a lot of scrub/woody material will be removed to facilitate the development – can this be retained on-site? This would be an effective measure to retain biodiversity value.

In summary, prior to determination, we request that an ecological assessment is provided, along with the full metric calculations and condition assessments. Management prescriptions to achieve net-gain would also be helpful.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Luke Wallace
Biodiversity Officer

This response was submitted following consideration of the following documents:
Biodiversity Net-Gain Report. Greenlink. October 2022.

Gravesham Borough Council