



## ECOLOGICAL ADVICE SERVICE

**TO:** *Ethan Bonthron*

**FROM:** *Luke Wallace*

**DATE:** *20 March 2023*

**SUBJECT:** *20230136 / Land at Worcester Close, 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 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.*

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Under section 40 of the NERC Act (2006) and paragraph 174 of the NPPF (2021), biodiversity must be maintained and enhanced through the planning system. Additionally, in alignment with paragraph 180 of the NPPF 2021, the implementation of enhancements for biodiversity should be encouraged.

Whilst there is unlikely to be any protected species interest, the proposals include almost complete replacement of the site's grassland (and semi-mature trees). This would entail the loss of biodiversity and site's ecosystem service value (also referenced in paragraph 174 of the NPPF).

As such, we advise that it demonstrated that site is achieving a biodiversity net-gain prior to determination of the application.

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:  
*Preliminary Ecological Appraisal. The Ecology Partnership. September 2022.*