



ECOLOGICAL ADVICE SERVICE

TO: Katherine Parkin
FROM: Helen Forster
DATE: 17 March 2026
SUBJECT: Milton Place Car Park 20251283

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.

Deemed Condition Application 20250167 was required to achieve a 10% Biodiversity Net Gain. As such prior to any works commencing the biodiversity gain plan required as part of the deemed condition discharge must be submitted to the LPA. We advise this condition is not included on the decision notice but it is still required to be discharged as it is a deemed condition required as part of BNG

Condition 7 states: *The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the approved biodiversity gain plan and including:*

- (a) a non-technical summary;*
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority,*

has been submitted to, and approved in writing by, the local planning authority. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

We have reviewed the updated landscaping plan and HMMP and we advise that we are satisfied with the proposed management.

We highlight that the management plan has detailed that the wildflower meadow areas will only be cut once a year when established and the scrub will be cut on a 3 year rotation. We advise that if the applicant does not agree with these management measures the HMMP will have to be updated.

We recommend that the management confirms that the management is suitable to the LPA prior to the discharge of the condition.

Subject to GBC receiving confirmation we are satisfied the condition can be discharged.

We advise that the management must be implemented as detailed within the HMMP.

Condition 4 states: *No development shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The document shall cover all environmental impacts from the clearance and construction phases of this development including details of the following, as well as any other measures deemed reasonably necessary*

Point (i) of the condition wording requires ecological mitigation measures and these have not been included within the CEMP. However as part of the application we provided the following comments:

The submitted Ecological Impact Assessment (James Blake Associates, February 2025) concludes that the application site is broadly unsuitable for most protected/priority species given its urban setting and largely uniform habitat composition. The only ecological constraint identified is nesting birds. As such, integration of measures to avoid impacts to nesting birds into any Construction Management Plan (CMP) is strongly recommended. This would include avoiding vegetation clearance during the core nesting period which is March through August.

As a Breeding bird informative has been included within the decision notice and google earth does not indicate that the site has change significantly since the surveys were carried out we are satisfied that the CEMP does not need to be updated. We have no further comments to make on this condition.

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

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Habitat Management and Monitoring Plan; Arbtech; Feb 2025
- Construction Environmental Management Plan; PB ; November 2025
- Landscape General Arrangement Plan ; FPCR ; May 2025