



ECOLOGICAL ADVICE SERVICE

TO: Lucy Hankin

FROM: Hannah Simmons

DATE: 12 August 2024

SUBJECT: 20240651 / 34 Admers Wood, Gravesend, DA13 0SP

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.

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 ecological impacts.

We have taken this view due to photos of the eaves and aerial photography show the roof of the building to be in good condition which is unlikely to support crevice dwelling bats, and the extension is to only impact on a small portion of the front garden. As such, we are satisfied that there is no requirement for an ecological survey to be carried out at this time.

Whilst we have assessed the roof as potentially unlikely to support crevice dwelling bats, there is still the potential that they may be roosting under the tiles. During the works, should a bat be found, all works must cease immediately, and an experienced ecologist be consulted for advice going forward.

No lighting plan has been submitted and, therefore, we assume the proposed development will not include external lighting. If lighting is being proposed, we recommend that it is a maximum of one light over the entrance on a motion sensor, timed to go off, is downward facing and does not directly light any proposed wildlife enhancements (such as bat or bird

boxes). If lighting is required, this can be secured via a condition if planning permission is granted.

Biodiversity Net Gain and Ecological Enhancements

Under section 40 of the NERC Act (2006) and paragraph 180 of the NPPF (2023), biodiversity must be maintained and enhanced through the planning system. Additionally, in alignment with paragraph 186 of the NPPF (2023), the implementation of measurable net gains for biodiversity (integrated as part of design) should be encouraged.

This application is exempt from delivering statutory biodiversity gains as it is a householder application. However, paragraph 180(d) of the NPPF 2023 states: "*Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity*" which is typically taken to mean a measurable 1% gain. As such, even exempt applications are required to deliver biodiversity gains.

No landscaping plans have been submitted with this application. Some loss of the front garden will occur due to the extension. Without a landscape plan, we are unable to determine if the site will attain a measurable net gain as per the NPPF. However, given that much of the site will remain greenspace, there is the potential that the site can achieve a measurable net gain as per the NPPF if suitable, native planting and habitats are proposed on site. To ensure that measurable net gain can be achieved, we advise that the landscaping, establishment, and management plan(s) are secured with a condition if planning permission is granted.

Enhancement features are not considered as part of a measurable net gain; however, we expect enhancement features to also be incorporated into an enhancement plan within the red line boundary. These can include bat and bird durable boxes, log piles, hibernacula, and hedgehog homes and holes in close board fencing.

Suggested condition wording

Within three months of works commencing, detailed plans showing how the development will enhance and maintain biodiversity, plus an establishment and management plan for native planting, will be submitted to, and approved in writing by, the local planning authority. This will include details of native and wildlife-friendly planting, bat and bird durable boxes, log piles, hibernacula, and hedgehog homes and holes in close board fencing. The approved measures will be implemented and retained thereafter.

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

Hannah Simmons
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Eaves photo. 22 July 2024