



ECOLOGICAL ADVICE SERVICE

TO: *Amanda Cue*

FROM: *Philippa Bromley*

DATE: *19 December 2025*

SUBJECT: *20251142: Cyclopark, 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 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.

SUMMARY: SUFFICIENT INFORMATION

We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination. Recommended condition/informative wording is provided below.

BIODIVERSITY NET GAIN

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications¹ for development (unless exempt^{2,3},) must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

The BNG metric (September 2025) describes a 1169m² site, comprising developed sealed land and modified grassland. The current proposal will result in an on-site net gain of 10.07% in habitat units (a unit change of 0.3156 to 0.3474) as a result of proposed habitat enhancement and creation. The submitted information details the enhancement of modified grassland to other neutral grassland, to offset the loss of amenity grassland due

¹ All planning applications for major development (unless exempt) submitted on or after 12th February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2nd April 2024.

² Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

³ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

to the proposed bike hire facility and associated works. We are satisfied that these proposals will allow a BNG of over 10% for habitats to be achieved.

We advise that we are satisfied that sufficient information has been provided to meet the requirements of mandatory Biodiversity Net Gain.

Biodiversity Gain Plan (BGP)

If planning permission is granted, the statutory biodiversity gain condition (and its reason for imposition) should not be included on decision notices as a condition. The condition cannot be varied or removed. An application must be made to discharge it as any other condition.

We recommend an informative in line with the Planning Practice Guidance (Paragraph: 026 Reference ID: 74-026-20240214)¹² should be included on the decision notice to set out the legislative requirements in relation to biodiversity net gain.

The development, if permitted, will be subject to the deemed condition of planning permission relating to biodiversity gain as per Schedule 7A 13(1) of the Town and Country Planning Act 1990. The condition is that the development may not be begun unless—
(a) a biodiversity gain plan has been submitted to the planning authority, and
(b) the planning authority has approved the plan.

The condition cannot be varied or removed. An application must be made to discharge it as any other condition. We recommend it is referred to in decision notices in the form of an informative. The government's published Biodiversity Gain Plan (BGP) template can be used to discharge it: [Biodiversity gain plan - GOV.UK](#). Please note that the submission of the finalised Statutory Biodiversity Metric/BGP is required by law prior to the commencement of any development.

Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out the biodiversity net gain information which needs to be included on non-exempted decision notices. The Planning Practice Guidance (Paragraph: 026 Reference ID: 74-026-20240214)⁴ provides a link to a document with [suggested paragraphs for Biodiversity Gain Information](#) to fulfil these requirements.

Please note that certain information is required to discharge the biodiversity gain condition. The government's published Biodiversity Gain Plan (BGP) template⁵ should be submitted with the application to discharge the biodiversity gain condition. This template also indicates which other documents and plans should support the application for discharge.

The following condition is not a statutory requirement but unless imposed there would be no requirement that the Biodiversity Gain Plan submitted for approval to be in accordance with any biodiversity or ecological information submitted with the planning application. This condition may not be appropriate for some outline planning permissions where the post-

⁴ [Biodiversity net gain - GOV.UK \(www.gov.uk\)](#)

⁵ [Biodiversity gain plan - GOV.UK](#)

development biodiversity value will not be known until reserved matters have been approved.

Suggested Condition Wording:

The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the [insert report title and reference number], for [insert address], dated [insert day, month and year] and prepared by [insert company].

Reason: To ensure the proposals are in accordance with details submitted and considered as part of the planning application, in accordance with [insert relevant policy].

Habitat Management and Monitoring Plan

A Habitat Management and Monitoring Plan (HMMP) has been provided. While the submission of an HMMP is not mandatory at this stage, it demonstrates how the proposed habitat enhancements will be delivered and maintained.

If planning permission is granted, we recommend that the decision notice include a **condition** requiring the implementation and maintenance of the submitted HMMP for 30 years from the "completion of development"⁶ (Paragraph 9(3) of Schedule 7A of the Town and Country Planning Act 1990). This will secure the delivery of the proposed habitat enhancements and monitoring in accordance with the statutory Biodiversity Net Gain requirements.

We have not provided suggested condition wording as we will defer to the LPA

ENHANCEMENTS

The proposed development provides opportunities to incorporate features into the design which are beneficial to wildlife, such as native species planting and the installation of integrated bat/bird nest boxes. This is in accordance with Paragraph 193 of the NPPF that "opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity".

It is therefore recommended that a Biodiversity Enhancement Plan (BEP) be prepared, identifying suitable measures proportionate to the development and site context. A range of potential enhancement options is outlined in Appendix 1 to inform the BEP.

Therefore, we recommend that measures to enhance biodiversity are secured as a condition of planning permission, if granted.

Biodiversity Enhancement Plan

Suggested condition wording:

Prior to the commencement of works, a Biodiversity Enhancement Plan (BEP) shall be submitted to and approved in writing by the local planning authority. The plan

⁶ PPG 015 Reference ID: 74-015-20240214

shall include full details of biodiversity enhancements. Details shall also include (as appropriate) provision of durable and suitably placed bat/bird boxes, the provision of bee bricks and/or the provision of log piles/artificial refugia for reptiles and amphibians.

Philippa Bromley
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Proposed Site Plan (Leftfield Studio, August 2025)
- Retained Habitat Plan (Leftfield Studio, October 2025)
- Design and Access Statement (Leftfield Studio, September 2025)
- Existing Habitat and Proposed Habitat Enhancement (Leftfield Studio, October 2025)
- Habitat Location Plan (Leftfield Studio, October 2025)
- Habitat Management and Monitoring Plan (Leftfield Studio, October 2025)
- Small Site Metric (September 2025)

Appendix 1: General Biodiversity Enhancement Table

Possible Enhancements	Biodiversity	Details
Provision of ready-made bird boxes		Suitability: All development. Location: Semi-mature/mature trees, buildings To provide a long-term ecological benefit for the site, boxes will need to be correctly sited: • Be away from windows and doors; • Be at the appropriate height for the target species and erected in accordance with the manufacturer guidelines; • Be sheltered, and sited on a northern or eastern facing aspect; • The boxes should be away from artificial light sources. • 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 • There should be a clear flight path to the box, so vegetation should not clutter the box entrance. Material: Wall or tree-mounted woodcrete or building integrated boxes are generally recommended for development projects over wooden boxes. 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 2024. Potential target species: Swifts: If trying to attract swifts, the minimum height for box placement is 4.5m. Boxes should be placed on a sheltered, north facing aspect, away from doors and windows. Care needs to be taken to avoid placement of swift boxes very close to trees or other structures which could provide a perch for predators, or not provide a good, clear flight line into the bird box. Further information is available from Swift Conservation⁷. Starling: Starling boxes will need to be sited at a minimum height of 2.5m from ground level, although around 5m high will likely be better. They need a 45mm box entrance hole. House Sparrow: House sparrow boxes will need to be site a minimum height of 2m from ground level, although around 5m will likely be better. They need a 32mm box entrance hole. (For relevant amber/red listed species e.g., wren): Open fronted boxes are generally best placed hidden from view. For example, placed on a fence/wall with bushes/climbers growing on it. Maintenance: 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)⁸ and British Trust for Ornithology (BTO)⁹.

⁷ [Fitting Swift Nest Places \(swift-conservation.org\)](https://www.swift-conservation.org/)

⁸ [How To Clean a Bird Nesting Box - The RSPB](https://www.rspb.org.uk/conservation/birds/conservation/how-to-clean-a-bird-nesting-box/)

⁹ [Putting up a nest box | BTO - British Trust for Ornithology](https://www.bto.org.uk/conservation/birds/conservation/putting-up-a-nest-box/)

Provision of bat boxes/bricks/tubes/tiles or bat roosting spaces within the new buildings	Suitability: Most development. Location: Semi-mature/mature trees, buildings To provide a long-term ecological benefit for the site, boxes will need to be correctly sited¹⁰: • Be away from windows and doors or any features that might allow access to cats; • Be at the appropriate height (ideally 4-5m high) and erected in accordance with the manufacturer guidelines. • Be sheltered, and with the majority sited on a southerly facing aspect; • The boxes and a flight path to the box should be unlit; • A clear flight path to the box is needed, so vegetation should not clutter the space around the box; and • On trees, only mature or semi-mature specimens should be chosen. Material: Wall or tree-mounted woodcrete or building integrated boxes are generally recommended for development projects over wooden boxes. 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 2024. Maintenance: Bat boxes should only be checked by a suitably licensed individual to avoid breaches of legislation.
Provision of space for solitary bees	Suitability: Most development. Location: Building integrated or wall-mounted 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. Material: 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 there is a commitment to regular maintenance, less durable boxes can be acceptable. Erection: Follow the manufacturer guidelines. Maintenance: See www.bumblebeeconservation.org/bee-nest-boxes/. And here.
Provision of hedgehog holes in fencing	Suitability: Many developments. Location: Base of fencing Construction: 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

¹⁰ [Putting up your box - Bat Boxes - Bat Conservation Trust](#)

	future residents, a sign above the hole is recommended as shown on the hedgehog street website ¹¹ .
Provision of hedgehog nesting boxes	Suitability: Many developments. Location: 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. Material: 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. Maintenance: See information provided by Hedgehog Street¹² or The British Hedgehog Preservation Society¹³.
Provision of hibernacula (for great crested newts or reptiles)	Suitability: For larger sites with suitable habitats such as hedgerows and long grassland. Location: 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. Material and construction: 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 infilling with a mixture of topsoil and rubble, sleepers, logs, etc. For ideas on the design and construction of suitable hibernacula, see here. Maintenance: Hibernacula should be left undisturbed. Where log filled hibernacula deteriorate over time, to maintain habitat provision, consider building new ones.
Provision of log piles (for invertebrates, but could also benefit other species e.g., amphibians, reptiles, hedgehogs)	Suitability: For sites which can provide the right location and surrounding vegetation. Location: 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. Material and construction: 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. 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 pyramid¹⁴.
Pond creation	Suitability: Many developments. Location: 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.

¹¹ [Link your garden with a hedgehog highway \(hedgehogstreet.org\)](http://linkyourgardenwithahedgehoghighway.hedgehogstreet.org)

¹² <https://www.hedgehogstreet.org/cleaning-out-boxes/>

¹³ [Hedgehog Homes \(britishhedgehogs.org.uk\)](http://hedgehoghomes.britishhedgehogs.org.uk)

¹⁴ [Build-a-log-pile-for-stag-beetles.pdf \(ptes.org\)](#)

	Construction: 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. 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 vegetation. How to build a wildlife pond guide: http://www.froglife.org/wp-content/uploads/2013/07/JAW2014-for-printing-HLF1.pdf https://freshwaterhabitats.org.uk/pond-clinic/create-pond/
Provision of native/wildlife-friendly planting	Suitability: Most development. Native Species: 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 soil¹⁵. https://www.rhs.org.uk/advice/profile?pid=848 or https://www.britishflora.co.uk Hedgerows: 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. 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 here). Establish climbing plants on walls and other vertical structures: Where space is limited, climbing plants can provide increased wildlife benefit within the space available. Climbing Plants & Wall Shrubs - The RSPB

¹⁵ [Plants for Bugs - RHS science projects / RHS Gardening](#)