



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher

FROM: Helen Forster

DATE: 20 December 2024

SUBJECT: 12 Campbell Road, Gravesend 20240949

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.

We are providing updated information following receipt of photos from the planning officer.

No ecological information has been submitted with this application. As a result of reviewing the data we have available to us, the information submitted with the planning application and photos provided by the planning officer we advise that the proposed development has limited potential to result in significant ecological impacts.

We have taken this view as the photos demonstrate that the aspect of the building to be impacted by the works appear to be in good condition limiting the opportunities for roosting bats to be present. As such we are satisfied that no ecological surveys are required.

Under section 40 of the NERC Act 2006 and paragraphs 187 and 193 of the NPPF 2024 biodiversity should be maintained and enhanced through the planning system. Therefore if planning permission is granted we recommend that an ecological enhancement condition is included:

Within 3 months of works commencing within the site an ecological enhancement plan must be submitted to the LPA for written approval. The plan must demonstrate how the site will enhance biodiversity through the inclusion of ecological enhancement features within the buildings and site. The plan must be implemented as approved.

Biodiversity Net Gain

Under the Environment Act 2021, all planning applications for major development (unless exempt^{1,2}) submitted on or after 12th February 2024 in England, will have to deliver at least a 10% biodiversity net gain. It is a requirement for minor applications, unless exempt, submitted on or after the 2nd April 2024.

The applicant has indicated within the application form that that they do not consider the general Biodiversity Gain Condition applies to this application. The applicant has indicated that this is because the development is subject to the de minimis exemption. The de minimis exemption applies where:

- The development will not impact any onsite priority habitat; AND
- The development will not impact more than 25 square metres of onsite habitat with a biodiversity value greater than zero; AND
- The development will not impact more than 5 metres of onsite linear habitat.

From reviewing satellite photos we agree with the conclusion that the site meets the de-minimis exemption. The aerial photos do suggest that prior to 2024 there was vegetation adjacent to the site but it appears it was not within the redline boundary and therefore we are satisfied that it does not need to be considered.

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:
Plans and Extensions; EP Architects;

¹ [Biodiversity net gain: exempt developments - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

² [The Biodiversity Gain Requirements \(Exemptions\) Regulations 2024 \(legislation.gov.uk\)](https://www.legislation.gov.uk)