



ECOLOGICAL ADVICE SERVICE

TO: Kelly Joyce
FROM: Elizabeth Fagg
DATE: 21 August 2025
SUBJECT: 20250563 7 Old Road West, 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.

We reviewed this application for formation of vehicular access and provision of one parking space in front garden and have provided the following comments below.

PROTECTED SPECIES

The application is for the removal of an ornamental lawn, shrub and hedge to provide parking and there are limited opportunities for protected species presence, other than breeding birds that may be using the hedge and shrubs during breeding season. We do not require any ecological surveys.

If planning permission is approved, we recommend the following informative is used

BREEDING BIRD INFORMATIVE

The applicant is reminded that, under the Wildlife and Countryside Act 1981 (as amended), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this Act.

Habitats are present on and around the site that provide opportunities for breeding birds. Any work to vegetation/structures that may provide suitable nesting habitats should be carried out outside of the bird breeding season (1st March to 31st August inclusive) to avoid

destroying or damaging bird nests in use or being built. If vegetation/structures need to be removed during the breeding season, mitigation measures need to be implemented. This includes examination by a suitably qualified and experienced ecologist immediately prior to starting work. If any nesting birds are found, works must cease until after the birds have finished nesting.

N.B.: It should be noted that some birds are capable of nesting outside of these times, especially where weather conditions are favourable. Birds such as feral pigeon, wood pigeon and barn owl have been recorded nesting in every month of the year. Care when removing bird nesting habitat may therefore be required at all times of year, with attention paid to the nesting habits of the species that could make use of the site and weather conditions at the time of clearance.

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.

We consider this application exempt from statutory BNG because it is a householder application as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

The front garden vegetation within the front of the dwelling, approximately 22m² will be lost for the placement of the block paved drive. This will include the loss of lawn, approximately a 4m length of ornamental hedgerow and other shrubs. This is too small an area to use within the BNG statutory metric tools to quantify the net loss for the LPA.

We highlight to the LPA that the planning statement has referred to small areas of garden loss and previous appeals.

The planning statement has stated soft landscaping will be placed at the south and east of the existing garden where we note there is already some existing planting present, shown within the photographs in the document, so benefits from new planting will be somewhat limited and we anticipate a minor loss will occur.

Gravesham Borough Council need to consider this application under Policy CS12:

Green Infrastructure – Policy seeks to create, protect, enhance and maintain a multifunctional network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors within the Borough. As well as protecting the overall landscape character of the Borough and sites designated for their biodiversity value and ensuring no net loss of biodiversity in the Borough.

To reduce the loss, we consider that the block driveway could be replaced with a 'grasscrete' type system which would retain some vegetation and could be planted with low growing pollinator friendly species.

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)

ENHANCEMENTS

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for BNG, avoidance, mitigation and compensation.

The net gain assessment does not take into account which species are planted. So over and above what is considered for net gain more can be done to enhance biodiversity. We note this existing planting is of low value for wildlife due to the plant species present and we consider that any replacement planting is with plants that have a benefit to pollinators and a link to suitable plants is here <https://www.rhs.org.uk/science/research/plants-for-pollinators>.

We recommend a planting plan which improves the biodiversity value is provided as well as insect homes. A recommended condition wording is below.

Within three months of works commencing a plan detailing how the development will enhance biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include a pollinator friendly planting plan and bee bricks/insect homes. 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.

Elizabeth Fagg
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Planning Statement, GSP, June 25
- Site location plan, GSP, 23/5/25
- Proposed block plan, GSP, 5/6/25