



ECOLOGICAL ADVICE SERVICE

TO: Sharon Sahota
FROM: Elizabeth Fagg
DATE: 04 June 2025
SUBJECT: 20241153 232 Singlewell Road, 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/biodiversity net gain** information has been provided for determination. Recommended **condition/informative** wording is provided below.

Protected Species

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 significant ecological impacts.

The site consists of managed gardens and building which is to be demolished. We are satisfied that no ecological information is required as the garden is regularly managed limiting opportunities for protected/notable species to be established and images from Google Street View dated October 2024 show that the roof appears to be in good condition with no missing or lifted tiles, therefore we are satisfied that bat surveys are not required. As such, we are satisfied that there is no requirement for an ecological survey to be carried out at this time.

Breeding Birds

It is possible that breeding birds may be using the vegetation in the front and rear gardens. We advise that the following informative is included should planning permission be granted.

Breeding bird informative – suggested wording

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.

Biodiversity Net Gain (BNG)

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). Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

The application form states the proposal is exempt from BNG under the de minimis exemption. For the application to be considered exempt⁴ under the de minimis exemption, the following must apply:

- The development will not impact any onsite priority habitat; AND
- The development will not impact more than 25 m² of onsite habitat with a biodiversity value greater than zero; AND
- The development will not impact more than 5 m of onsite linear habitat.

We note the existing property includes a paved area at the rear and existing and proposed measurements are provided for house, hardstanding and soft landscaping. These indicate that there will be no net loss of habitat. We consider that if the garden is retained and the new footprint does not impact greater than 25m² of vegetated garden or 5m of hedgerow, that this proposal likely meets the de minimis exemption criteria.

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)

⁴ <https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>

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.

We note the proposed block plan includes soft landscaping to ensure there is no loss of area following the development. As per the NPPF we require an enhancement plan which includes a landscaping plan, with the planting of native and wildlife friendly species, which must be submitted as a condition of planning permission if planning permission is granted.

We advise that other enhancements are also incorporated into a plan within the red line boundary, including bat and bird bricks, hedgehog homes and holes in any close-board fencing, in addition to the native planting.

Suggested condition wording

Within three months of works commencing, a detailed plan showing how the development will enhance and maintain biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include details of native and wildlife-friendly planting, durable bat and bird bricks, hedgehog homes and holes in any 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.

Elizabeth Fagg
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Location plan, existing block plan, proposed block plan, Dream design Develop, 1/3/25