



ECOLOGICAL ADVICE SERVICE

TO: Kelly Joyce

FROM: Jonathan Lynch

DATE: 29 May 2025

SUBJECT: 20250236 / Finches Rhododendron Avenue Meopham Gravesend Kent DA13 0TU

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 – FURTHER INFORMATION REQUESTED

We have reviewed the ecological information submitted in support of this application and advise that **further** information is requested from the applicant prior to determination of the planning application. This includes:

- Clear photographs of all aspects of outbuildings/structures proposed for demolition.

ECOLOGICAL CONSTRAINTS AND MITIGATIONS

No ecological information has been submitted with this application. As a result of reviewing the data available to us and the information submitted with the planning application, we advise that further information is sought from the applicant with regards to the potential for ecological impacts to arise.

It is noted that proposals are relatively small in scale and will impact upon a residential garden only. However, from the information provided, it has not been possible to fully scope out all ecological constraints, including breeding birds and roosting bats.

To establish the potential for protected species presence which must be taken account of in the planning decision, in the first instance, high quality, labelled photographs of all outbuildings/structures relevant to the proposed development should be requested. These photographs may provide sufficient confirmation to the LPA that no ecological surveys are necessary. However, where photographs are inconclusive, or indicate possible features suitable for protected species (particularly roosting bats and nesting birds), an Ecological Impact Assessment (EclA) may need to be undertaken by a suitably qualified ecologist.

The results of the necessary surveys carried out, and details of any mitigation required should be submitted prior to determination of the planning application. This is in alignment with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005¹, which states *“it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”*.

BIODIVERSITY NET GAIN (BNG)

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.

OTHER ENHANCEMENT MEASURES

No biodiversity enhancements are currently proposed. Paragraph 187(d) of the NPPF 2024 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, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.”* This is notwithstanding any exemption from statutory BNG.

Suggested biodiversity enhancements include the provision of durable bird/bat boxes (for house sparrows, starlings, swifts or as appropriate to the development and preferably integrated into new structures), native tree/shrub planting, sowing of an appropriate wildflower mix, the creation of artificial refugia for reptiles/amphibians, the creation of ‘hedgehog highways’ (13×13cm gaps in closed board fencing) and/or creation of bug hotels/bee bricks for invertebrates. Integrated features (e.g. swift bricks or bat tubes) should be clearly visible on elevations plans.

¹ [odpm-circ-0605.qxd \(publishing.service.gov.uk\)](#)

Wording for a biodiversity enhancement condition can be provided on receipt of the requested information.

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

Jonathan Lynch
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Covering Letter (Blackburn Architects, February 2025)
- Site Location Plan (Blackburn Architects, February 2025)
- Existing Site Plan (Blackburn Architects, March 2025)
- Proposed Site Plan (Blackburn Architects, March 2025)