



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher

FROM: Emma England

DATE: 01 April 2026

SUBJECT: 20251176 / 24 St Georges Crescent, 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: ADDITIONAL INFORMATION REQUIRED

We understand proposals to comprise the change of use of a dwellinghouse to a Children's Residential Care Home. The change is to include a single storey rear extension and internal alterations.

We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. The following information is required prior to determination:

- Updates to the submitted biodiversity net gain information.

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.

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

Having reviewed submitted information⁴, we understand a 10% biodiversity net gain is a statutory requirement of this proposed development. We consider there is no local policy biodiversity net gain requirement above 10% for this development.

We have produced the following table to aid the local planning authority in ascertaining whether sufficient BNG information has been submitted:

Table 1: To show whether the applicant has met the minimum validation requirements

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	No	The application form indicates that the applicant considers that biodiversity net gain does not apply to the application. However, biodiversity net gain information has subsequently been submitted following our previous advice note and so we take this to mean that the applicant now considers that mandatory 10% BNG does now apply to this application.
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate).	Yes – but needs updating	A small sites metric calculation tool was completed by Mr William Norris on 27 th February 2026, with a site walkover reported on 28 th February 2026. A site walkover should be carried out before completing the metric calculations. Photos and aerial imagery indicates that the site should be classified as developed land; sealed surface, vegetated garden and unvegetated garden/vacant and derelict land.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	-	-
The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value.	Yes – but needs updating	The site is 289 square metres in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool (289.9 square metres) matches the reported red line boundary site area as per the application form.

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 References to the biodiversity value of any habitat or habitat enhancement within this section of the advice note refer to the value as calculated in accordance with the biodiversity metric.

		We are not content with the baseline habitat classifications. Aerial imagery (April 2024 and August 2025) indicates that at baseline the site should be classified as a mixture of vegetated garden and unvegetated garden/ vacant/derelict land. We would recommend that the baseline habitat calculations are updated in the submitted biodiversity metric calculation tool. We highlight to Gravesham Borough Council that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28th November 2025. The LNRS was published after the 'relevant date'. As the LNRS was published after the relevant date, the 'pre-development' biodiversity value does not need to be updated. The post-development strategic significance scores that have been applied to the created habitats however are not correct either prior to the publication of, or after the publication of the LNRS. The strategic significance scores for the post-development created habitats need to be updated to reflect 'low strategic significance'/'area/compensation not in local strategy/no local strategy'. The strategic significance score can be determined through use of the Local Habitat Map, available here: Local Nature Recovery Strategy mapping portal Making Space For Nature Kent, with guidance on its use available here: How to use the online mapping tool Kent and Medway Local Nature Recovery Strategy. A guidance document on how to apply strategic significance is available here: The-role-of-Kent-Medways-Local-Nature-Recovery-Strategy-in-Biodiversity-Net-Gain-Strategic-Significance-.pdf. We further disagree with the proposed habitats post-development and these need to be updated. Classifying porous paving as 'sustainable drainage system' is not appropriate as the feature will be unvegetated and so the condition assessment cannot be applied. The porous paving should be reclassified as unvegetated garden.
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		Further, we consider that a 'rain garden' at the site could not achieve more than 'moderate' condition and we would recommend that this be updated in the metric calculation tool. The rain garden would need to be appropriately designed to be successful. Making these changes is likely to result in a -10.14% biodiversity loss from the site and off-site compensation is likely to be required.
A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('<u>degradation</u>'), and where they have: • a statement to the effect that these activities have been carried out; • the date immediately before these activities were carried out; • the pre-development biodiversity value of the onsite habitat on this date; • the completed metric calculation tool showing the calculations, and • any available supporting evidence of this.	Yes	Hard surfacing was installed in May 2025. Prior to this the area was a mixture of unvegetated/vacant and derelict land and vegetated garden. We would anticipate the 'relevant date' for the purposes of BNG should be April 2024.
A description of any <u>irreplaceable habitat</u> (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date).		None reported.
Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).	Yes – but needs updating	The plans need updating to reflect the recommended habitat changes above.

The habitat baseline must be correct prior to determination, but full details of how the proposals will deliver biodiversity gains are not strictly required until submission of the pre-commencement Biodiversity Gain Plan. However, it is advisable to seek an indication prior to determination as, it gives an indication of how the biodiversity gain hierarchy will be applied, and if granted consent, the project cannot commence until this information has been submitted to and approved by the local planning authority. This information will also provide sufficient indication as to how conditions need to be applied should planning permission be granted for this application.

The government's standing advice on BNG states (under paragraph 002 Reference ID: 74-002-20240214): "[BNG] is not just a post-permission matter. To ensure the biodiversity gain objective is met and the condition can be discharged successfully, it is important biodiversity net gain is considered throughout the planning process."

Ecological Impact Assessment

Having review the photographs submitted as part of the BNG information, we consider that the building is very low risk for bats and we therefore do not request an ecological impact

assessment. However, a bat informative should be included on the decision notice should planning permission be granted for this application.

Emma England
Biodiversity Officer

This response was submitted following consideration of the following documents:

Anwar, A. (November 2025) PP-14495721. 24 St Georges Crescent, DA12 4AR. Gravesham Borough Council, Application for Planning Permission.

Livarch (Undated) Livarch24 SGC/111. 24 St George Crescent, Gravesend, Gravesham, DA12 4AR.

Livarch (November 2025) Livarch/24SGC/101. Existing and Proposed Plans. 24 St George Crescent, Gravesend, Gravesham, DA12 4AR.

Livarch (Undated) Livarch/24SGC/BNG.

Norris, W (February 2026) The Small Sites Metric 1.2.3 24 St Georges. 20251176.

Unauthored (Undated) Biodiversity Net Gain Statement. 24 St George Crescent, Gravesend, Gravesham, DA12 4AR.