



## ECOLOGICAL ADVICE SERVICE

**TO:** Sharon Sahota  
**FROM:** Elizabeth Fagg  
**DATE:** 04 September 2025  
**SUBJECT:** 20250641 14 Old Road West, Gravesend

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*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.*

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We reviewed this application for change to the front garden to remove the grassed area and provide a predominately block paved area with a narrow planted border alongside the access path/steps and have provided the following comments below.

### PROTECTED SPECIES

The application is for the removal of a grassed area to provide parking and there are limited opportunities for protected species presence. We do not require any ecological surveys.

### BIODIVERSITY NET GAIN

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications<sup>1</sup> for development (unless exempt<sup>2,3</sup>), must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

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<sup>1</sup> All planning applications for major development (unless exempt) submitted on or after 12<sup>th</sup> February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2<sup>nd</sup> April 2024.

<sup>2</sup> Biodiversity net gain: exempt developments - GOV.UK ([www.gov.uk](http://www.gov.uk))

<sup>3</sup> The Biodiversity Gain Requirements (Exemptions) Regulations 2024 ([legislation.gov.uk](http://legislation.gov.uk))

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 20m<sup>2</sup> of lawn will be lost for the placement of the block paved drive. This is too small an area to use within the BNG statutory metric tools to quantify the net loss for the LPA.

The plan, elevation and sections as proposed details a planted border alongside the entrance path/steps. As the small area of grass will have limited biodiversity value due to use and maintenance, the loss will be minor. The proposed new planting is limited but the applicant should ensure that opportunities for biodiversity in this space are maximised by using plants that attract pollinators, a list is provided here <https://www.rhs.org.uk/science/research/plants-for-pollinators>. This can be detailed within a submitted planting plan, detailed below under enhancements

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.*

We consider the biodiversity value of the application site is currently limited but suggest that Gravesham consider this application with the cumulative effect of loss of front gardens within this area.

To reduce the loss from hard surfacing, 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.

## **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 proposed border is the only green space to the front of the property. We consider that this border should have planting with plants that have a benefit to pollinators. We recommend a planting plan is submitted for this enhancement. 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. 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:

- Plan, Elevation & Sections as Existing, Penfold Project Services, June 25
- Plan, Elevation & Sections as Proposed, Penfold Project Services, June 25
- Location plan, Penfold Project Services, June 25