



## ECOLOGICAL ADVICE SERVICE

**TO:** Sharon Sahota  
**FROM:** Elizabeth Fagg  
**DATE:** 04 September 2025  
**SUBJECT:** 20250519 16 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 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 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 a precautionary method statement is in place for clearance and construction to provide measures to protect breeding birds and the retained Laurustinus tree. A condition wording is provided below.

Suggested condition wording:

*From commencement of works (including site clearance), to avoid impacts to protected and priority species, and retained trees and hedgerow, the following precautionary mitigation should be implemented:*

- 1. Any hedgerow and trees to be retained, including its roots, will be protected from damage;*

2. *Any work to vegetation that may provide suitable bird 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 within the breeding bird season a survey by a suitably qualified person needs to be conducted to confirm absence, prior to commencing works.*
3. *If at any time a protected species is discovered within the works area all works must stop while a suitably qualified ecologist and/or Natural England are consulted. Works will not resume until any required surveys and/or mitigation are complete*

## **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.

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> will be lost for the placement of the block paved drive. This will include the loss of lawn, approximately a 5m length of ornamental hedgerow to the roadside and other planting. A 'Laurustinus' tree present is of value to pollinators and is to be retained. 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 proposed plans show that a section of 1.8m high hedge and a small linear area of proposed planting is proposed. 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.*

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, we consider that the block driveway could be replaced with a 'grasscrete' type system which would retain some vegetation and could be planted with

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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))

low growing pollinator friendly species. The border and hedge planting should be of pollinator friendly species. Information is here  
<https://www.rhs.org.uk/science/research/plants-for-pollinators> .

## **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 and 1.8m high hedge are proposed to the west of the new driveway. We consider that this border and hedge should have planting with plants that have a benefit to pollinators to compensate for the loss from the removal of other plants. We recommend a planting plan is submitted for this enhancement and consideration if the inclusion of insect homes can be achieved in this space. 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 other measures where possible. 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:

- Site Location Plan, GSP, 23/5/25
- Proposed block plan, GSP, 23/5/25
- Planning statement, GSP, 23/5/25
- Proposed site plan and elevations/sections, GSP, 23/5/25