



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher

FROM: Helen Forster

DATE: 15 April 2024

SUBJECT: 20231301 Land To Rear Of, 15 - 17 Darnley rd, 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.

Internal building photos have been provided as part of this re-consultation. We when provided comments in January 2024 we understood that a new building was being erected and there would be no demolition or renovation works. The application form details that no works have commenced on site yet and therefore we can only presume that the photos have been submitted or uploaded on to the portal accidentally.

If no demolition/renovation works are being carried out on site we advise that the following comments from January 2024 are still valid. If building are being impacted by the proposal please confirm what buildings will be impacted and we can review and update our comments.

Comments provided January 2024

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.

We have taken this view due as the works will not result the demolition of any buildings and the satellite photos indicate that gardens are not overgrown with vegetation. As such,

we are satisfied that there is no requirement for an ecological survey to be carried out at this time¹.

Lighting

Lighting can have a negative impact on nocturnal species and while we acknowledge that the site is located in urban area there is still a need to ensure that any additional lighting is designed to minimise light spill.

We recommend that if planning permission is granted the **lighting condition** has the following requirements:

- Be designed following best practice guidance within Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 08/23 Bats and Artificial Lighting at Night'²
- Downward facing and on motion sensors

Ecological Enhancement/ Measurable Net Gain

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 180 and 186 of the National Planning Policy Framework (NPPF) 2023, biodiversity should be maintained and enhanced through the planning system. Additionally, in alignment with paragraph 186 of the NPPF 2023, the implementation of measurable net gains for biodiversity (integrated as part of design) should be encouraged. We highlight that due to the loss of the vegetated gardens the proposal will not result in a measurable net gain as per the requirements of the NPPF.

However measures to benefit biodiversity can still be incorporated in to the site (such as the inclusion of bat and bird boxes in the building) and we advise that if planning permission is granted, we advise the following condition is included.

Prior to completion, details of how the development will enhance biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include integrated and/or wall-mounted bird and/or bat boxes. Wall-mounted boxes will be made of woodcrete to secure a suitably long-term and low maintenance biodiversity enhancement for the site. Any boxes for birds will be targeted at red or amber listed species (as per the latest British Trust for Ornithology Birds of Conservation Concern list). The approved measures will be implemented and retained thereafter.

Appendix 1 provides some generic (non-exhaustive) information regarding the most common enhancements we see proposed. Suitable detail may include the provision of information such as:

- The proposed target species;
- Make and model of any boxes;
- Location information such as height, aspect, surrounding habitat;

¹ We consider we have taken a proportionate approach to ensure that the provision of information within the planning application is appropriate to the environmental risk associated with the development and its location in line with Clause 4.1.2 of BS42020 (BSI, 2013).

² ['Bats and Artificial Lighting at Night' ILP Guidance Note update released - News - Bat Conservation Trust](#)

- Detailed planting schedules; and
- Relevant (basic) management necessary to ensure the habitat is suitable for the target species.

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

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:

No Ecology Information;

Planning Statement; MIALEX; November 2023