



ECOLOGICAL ADVICE SERVICE

TO: Kelly Joyce
FROM: Nancy Inman
DATE: 02 October 2025
SUBJECT: 1 Gabriel Gardens, Gravesend 20250180

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: SUFFICIENT INFORMATION PROVIDED

We have reviewed the submitted ecological information and are satisfied that the site is exempt from Biodiversity Net Gain requirements, and that proposals are unlikely to result in adverse impacts to protected species.

NESTING BIRDS

Suggested Informative Wording:

All wild birds and their nests are protected from harm under Section 1 of the Wildlife and Countryside Act 1981. As such, any works which may result in impacts to nesting birds should be conducted outside of the core nesting season which is March through August (inclusive) or under ecological supervision. A suitable exclusion zone should be established around any active bird nest in the event one is discovered during works; this exclusion zone should be maintained until all nesting birds have fledged and the nest is unoccupied.

BIODIVERSITY NET GAIN - DE MINIMIS (APPLICABLE)

Having reviewed the proposals we consider this application to be exempt from mandatory biodiversity net gain, so that mandatory biodiversity net gain of 10% will not apply. We consider this application exempt because:

- The development will not impact any onsite priority habitat; AND
- The development will not impact more than 25 square metres of onsite habitat with a biodiversity value greater than zero; AND
- The development will not impact more than 5 metres of onsite linear habitat.

Whilst the BNG metric shows a net loss of 0.0063 units, it appears that the new building will occur primarily on areas of hardstanding and that gardens will be largely retained. At present there is 195m² of garden habitat, post-development this will reduce slightly to 170.2m².

We therefore consider this application to be exempt from Biodiversity Net Gain.

BIODIVERSITY ENHANCEMENT PLAN (BEP)

Suggested Condition Wording:

Prior to any works above slab level, a Biodiversity Enhancement Plan (BEP) shall be submitted to and approved in writing by the local planning authority. The plan shall include full details of biodiversity enhancements based on recommendations from the Preliminary Ecological Appraisal (KB Ecology, July 25).

The Plan shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

EVIDENCE OF IMPLEMENTATION - BEP

Suggested Condition Wording:

Within twelve months of first use of the development hereby approved, photographic evidence of the implementation of the approved biodiversity enhancement measures as required by condition X (the BEP condition) shall be submitted to the local planning authority for approval. The approved details shall be thereafter retained.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

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

Nancy Inman
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Existing Site Plans (Dec 24)
- Planning Design and Access Statement (RJS, Feb 25)
- Preliminary Ecological Appraisal (KB Ecology, July 25)
- BNG Metric and Plan (KB Ecology, Feb 25)