



ECOLOGICAL ADVICE SERVICE

TO: Adeoye Lawal
FROM: Helen Forster
DATE: 22 July 2026
SUBJECT: 2 Milton Place Gravesend 20260518

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.

SIMPLIFIED RESPONSE

In providing the following comments, all relevant information has been considered including ecological information (where submitted) and site plans. In addition, other documents when considered useful have been reviewed. Where provided, this will include (but not limited to) the design and access statement and arboricultural reports.

Additional supporting information and suggested condition wording can be found at the end of the report.

SUMMARY – SUFFICIENT INFORMATION

Ecological Element	Present on site	Additional Info Required	Comments
Protected/notable species	The PEA has detailed that the site supports suitable habitat for breeding birds, GCN, Reptiles, foraging/commuting bats and hedgehogs.	No	We are satisfied with the results of the surveys that have conclude that no further surveys are required. This is largely due to the site being isolated from

Ecological Element	Present on site	Additional Info Required	Comments
			connective habitat and being regularly cleared over the last 6 years. However the presence of protected/notable species can not be ruled out and therefore the precautionary mitigation detailed within the report must be implemented.
Ecological Enhancements	No details of ecological enhancements have been provided	No	We advise that an ecological enhancement plan is submitted as a condition of planning permission.
Lighting	No details of lighting plans have been provided. While in an urban area lighting can have a negative impact on protected /notable species.	No	A lighting plan must be submitted if planning permission is granted.
Designated Sites and Irreplaceable Habitats	The Site is within 6km of the Thames Estuary and Marshes SPA and Ramsar site.	No	A contribution to SAMMS must be made.
Biodiversity Net Gain (BNG)	A BNG assessment has been submitted	No	We are satisfied that sufficient information has been provided to meet the requirements of mandatory BNG. The proposal has detailed that the application will result in the loss 67% BNG for habitats and it will require 0.06habitat units to achieve a BNG. We note that the grassland within the site has been input as vegetated gardens but as it is a communal amenity area for the flats and will require management modified grassland and trees can be planted within the site which may enable the site to achieve a BNG of over 10%.

Ecological Element	Present on site	Additional Info Required	Comments
			This can be addressed within the biodiversity gain plan submission. We are satisfied that it is unlikely that these changes will trigger the site meeting the requirements for on site significant.

This response was submitted following consideration of the following documents:
Preliminary Ecological Appraisal (PEA), Biodiversity Metric Assessment (BMA);
Arborweald; April 2026

Designated Sites

Recreational Disturbance And National Site Network Sites (SAMMS/SAMMP)

The application site falls within the 6km zone of influence of the [Thames Estuary and Marshes Special Protection Area, Special Protection Area (6km)) and its/their associated Wetland(s) of International Importance under the Ramsar Convention (Ramsar Site) OR (Ashdown Forest Special Protection Area and Special Area of Conservation (7km)).

This type of development may cause additional recreational disturbance, and likely significant effects on birds using the SPA and applies and the applicant will be required to make a tariff payment which is based on the net number of additional dwellings/overnight accommodation proposed. The payment is to mitigate for additional recreational effects on the designated sites. The local planning authority must ensure that adequate means are in place to secure this mitigation before first occupation.

Gravesham Borough Council must consider the impact the proposal will have on these designated sites in accordance with the Conservation of Habitats and Species Regulations (CHSR) 2017 (as amended) and the National Planning Policy Framework (NPPF) 2024.

A decision from the Court of Justice of the European Union (CJEU: C-323/17) has detailed that mitigation measures cannot be considered when carrying out a screening assessment to decide whether a full 'Appropriate Assessment' is needed under the Habitats Directive. Therefore, we advise that there is a need for the local planning authority to carry out an Appropriate Assessment as part of a Habitats Regulations Assessment (HRA).

For this type of development, it is possible to obtain an autogenerated Natural England advice letter.

Biodiversity Net Gain

Any application which is required to achieve a 10% BNG must submit the following information as a minimum:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;

- the pre-development biodiversity value(s), [either on the date of application or earlier proposed date \(as appropriate\)](#);
- 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;
- 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 ('[degradation](#)'), 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;
- a description of any [irreplaceable habitat](#) (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); and
- 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).

BNG Deemed Condition information

The development, if permitted, will be subject to the deemed condition of planning permission relating to biodiversity gain as per Schedule 7A 13(1) of the Town and Country Planning Act 1990. The condition is that the development may not be begun unless—

- (a) a biodiversity gain plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The condition cannot be varied or removed. An application must be made to discharge it as any other condition. We recommend it is referred to in decision notices in the form of an informative. The government's published Biodiversity Gain Plan (BGP) template should be used to discharge it: [Biodiversity gain plan - GOV.UK](#). Please note that the submission of the finalised Statutory Biodiversity Metric/BGP is required by law prior to the commencement of any development.

Landscape and Ecological Management Plan

With the submission of the biodiversity gain plan a Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the local planning authority addressing:

- 1. Creation and enhancement of habitats in accordance with the Biodiversity Gain Plan;*
- 2. Management of on-site habitats to achieve biodiversity net gain in accordance with the Biodiversity Gain Plan;*

The content of the LEMP shall include the following:

- a) Plan showing the habitats to be created and managed*

- b) *Details of how the habitats will be established*
- c) *Timetable for implementation,*
- d) *Details of initial aftercare;*
- e) *Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);*
- f) *Persons responsible for implementing the works;*

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

Ecological Enhancements

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 the biodiversity enhancements to be implemented on-site. The Plan shall include (but not limited to) include provision of integrated bat and bird boxes, the creation of hedgehog highways (by creating small 13×13cm gaps in close board fencing) and the provision of bee bricks.

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

Sensitive Lighting (if any external lighting is proposed)

The condition requiring a lighting plan must have 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'¹
- Site plan showing the location and types of lighting
- Lighting must be downward facing and/or on motion sensors.

Precautionary Mitigation

Prior to and during the works the precautionary mitigation detailed within the Preliminary Ecological Appraisal (PEA), Biodiversity Metric Assessment (BMA); (Arborweald; April 2026) must be implemented as detailed. If works have not commenced within 2 years of the date of the report a review and, where necessary, update of the ecological report must be carried out prior to works commencing.