



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher
FROM: Annalice Line
DATE: 07 May 2025
SUBJECT: 20250244: 1 Russell Road, 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.

SUMMARY – NO FURTHER INFORMATION REQUIRED

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.

All buildings present on the site are in good condition and exhibit limited features suitable for roosting bat species. The absence of cracks, crevices, and other potential entry points reduces the likelihood of bats utilising these structures for roosting. Additionally, the site contains minimal vegetation and is predominantly hard standing, which further limits its ecological value and the potential for supporting diverse wildlife.

Given these factors, we conclude that the ecological impact of the proposed development is likely to be minimal and no ecological information is required to be submitted as part of this application.

Biodiversity Net Gain

Further, the applicant has indicated within the application form that that they do not consider the general Biodiversity Gain Condition applies to this application. As the

proposal does not have any vegetation within the site, we agree with this position due to the development being subject to the *de minimis* exemption:

- 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.

As such, we are satisfied that there is no requirement for a statutory biodiversity metric to be carried out at this time.

Under section 40 of the NERC Act 2006 and paragraphs 187 and 193 of the NPPF 2024 biodiversity should be maintained and enhanced through the planning system. Although BNG is not required we advise that ecological enhancement features must also be incorporated into the site. If planning permission is granted, we recommend that an ecological enhancement plan is included. Enhancements include bat and bird boxes and bee bricks within the site and buildings. We suggest the following:

Within 3 months of works commencing within the site an ecological enhancement plan must be submitted to the LPA for written approval. The plan must demonstrate how the site will enhance biodiversity through the inclusion of ecological enhancement features within the buildings. The plan must be implemented as approved.

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

Annalice Line
Graduate Biodiversity Officer

This response was submitted following consideration of the following documents:

- Planning Statement (MIALEX, March 2025)
- Design and Access Statement (Sub Rosa Architecture Jan 2024)
- Location Plan (Sub Rosa Architecture Jan 2024)
- Block Plan – Existing and Proposed (Sub Rosa Architecture Jan 2024)