



ECOLOGICAL ADVICE SERVICE

TO: Adeoye Lawal
FROM: Hannah Simmons
DATE: 23 June 2026
SUBJECT: 20260186 Green Farm, Shorne

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 – ADDITIONAL INFORMATION REQUIRED

We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application. The following information is required prior to determination:

- Outdated Ecology – site walkover and letter of validity from ecologist required
- Great Crested Newts - survey or District Level Licensing IACPC certificate required
- BNG – Clarification as to why tree T2 on block plans is not included in the metric/habitat baseline maps.

Outdated Ecology

The submitted ecological information is over 18 months old and, as such, is subject to consideration in accordance with CIEEM guidance on the lifespan of ecological surveys and reports which indicates that survey data between 18 months and three years requires re-assessment by a professional ecologist. Key considerations include (1) whether the site supports, or may support, a mobile species which could have moved on to site, or changed its distribution within a site, (2) whether there have been significant changes to the habitats present within the site and (3) whether the local distribution of a species in the wider area around a site has changed (or knowledge of it increased).

We cannot rule out the first of these considerations and, as such, we request that a suitably qualified ecologist conducts a site visit to ensure conditions have not changed since the most recent survey was undertaken. A letter of validity from a suitably qualified ecologist confirming that the site has not changed significantly and that no additional surveys are required (or, conversely, the results of additional surveys if they are required) should be submitted to the local planning authority prior to determination.

Great Crested Newts

The submitted ecological report has outlined that the proposed development has the potential to have detrimental effects on great crested newts (GCN). The application site lies within 250 metres of at least two ponds/waterbodies and is within an Green Risk Zone within the GCN Risk Zones for Kent¹. However, the site is 725m from an Amber Risk zone.

To adequately address the potential effects on GCN, we advise that one of two approaches will need to be taken. Either surveys will need to be undertaken (or reference made to available current data²) on the nearby ponds to ascertain the presence/likely absence of great crested newt, or district level licensing is available (and avoids the requirement for further survey/data).

If undertaking further survey, these will need to be undertaken in accordance with best practice³ and by a suitably qualified and experienced ecologist⁴. Following further survey, the survey results, along with any necessary mitigation/ compensation, will need to be submitted prior to determination of any planning application.

District Level Licensing (DLL) is a strategic mitigation scheme which requires a conservation payment to remove the need for on-site survey, mitigation and compensation. The use of DLL is restricted to areas defined as green or amber risk zones for GCN presence. DLL is not possible within red risk zones⁵.

If DLL is chosen by the applicant, a countersigned and dated⁶ DLL impact assessment and conservation payment certificate (IACPC) should be submitted to local planning authority prior to determination of the application. The IACPC would need to show the site address matches that of the planning application, and that the boundaries of the IACPC are the same⁷. Recent IACPCs may be issued with a location plan as a separate attachment. It would therefore be prudent for the local planning authority ask the applicant for a copy of the email from Natural England issuing the counter-signed and dated IACPC where the IACPC does not include a location plan. Evidence of the full conservation payment can then be conditioned if planning permission is granted.

¹<https://naturalengland-defra.opendata.arcgis.com/datasets/gcn-risk-zoneskent/explore?location=51.098205%2C0.660587%2C16.33>

² [European protected species policies for mitigation licences - GOV.UK \(www.gov.uk\)](#)

³ [Great crested newts: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#)

⁴ Suitably qualified ecologists can be found using either the: [CIEEM Registered Practice Directory](#) or the [Environmental Data Services Directory](#)

⁵ [GCN Risk Zones \(Kent\)](#)

⁶ An IACPC is provisional until: "all information required in sections 1, 2, 3 and 4 has been inserted by Natural England; and it has been signed and dated by the Applicant in section 6; and Natural England's administration fee has been invoiced for and (if applicable) the 1st stage Conservation Payment has/have been paid; and it has been signed and dated on behalf of Natural England in section 8."

⁷ [Great crested newts: district level licensing for local planning authorities - GOV.UK \(www.gov.uk\)](#)

The above is in alignment with Government Standing Advice and paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005⁸, which states “*it is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision*”.

Other Protected Species

Precautionary measures have been set out in the PEA for Breeding birds, Reptiles and Hedgehogs. We are satisfied that these are suitable for these species. Should the conditions on site have changed, then these may require updating as part of the conclusions of the walkover survey.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications⁹ for development (unless exempt^{10,11}), must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

Having reviewed submitted information¹², we consider a 10% biodiversity net gain is a statutory requirement of this proposed development. We consider there is no local policy biodiversity net gain requirement above 10% for this development.

We have produced the following table to aid the local planning authority in ascertaining whether sufficient BNG information has been submitted:

Table 1: To show whether the applicant has met the minimum validation requirements, expected information standards in line with planning practice guidance and any applicable national or local policies.

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	Yes	
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate) .	Yes	A site visit was carried out by a suitably qualified ecologist 14 January 2026. This is considered acceptable to inform the habitat baseline for this application given the site size, location and habitats reported.

⁸ [odpm-circ-0605.qxd \(publishing.service.gov.uk\)](#)

⁹ All planning applications for major development (unless exempt) submitted on or after 12th February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2nd April 2024.

¹⁰ Biodiversity net gain: exempt developments - GOV.UK ([www.gov.uk](#))

¹¹ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 ([legislation.gov.uk](#))

¹² References to the biodiversity value of any habitat or habitat enhancement within this section of the advice note refer to the value as calculated in accordance with the biodiversity metric.

Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	Yes	
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.	No	The site is 3663 square metres (0.37 hectares) in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool matches the reported red line boundary site area as per the application form. <u>Baseline Habitats</u> We are not content with the baseline habitat classifications. Prior to determination, we require that clarification as why the second tree (T2) on the block plans has not been included in the metric/habitat baseline maps. The block plans show that this tree is to be retained, yet no retained trees have been included on the metric. If required, this tree will need to be added to the metric and habitat map prior to determination. We highlight that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28th November 2025. The LNRS changes how strategic significance is considered and any BNG assessments produced after the LNRS was published can no longer use <i>Location ecologically desirable but not in local strategy</i>. All baseline information must be set to <i>Area/compensation not in local strategy/ no local strategy</i>. The baseline information has correctly reflected the published LNRS requirements.
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	Yes	None reported or visible on aerial imagery dated 2018-2026 (Google Earth Pro, accessed 23 June 2026 date)

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).	-	None reported.
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).	No	Whilst the red line boundary is correct, the baseline habitat map appears to be missing a proposed retained tree. Prior to determination, we require that clarification as why the second tree (T2) on the block plans has not been included in the metric/habitat baseline maps. The block plans show that this tree is to be retained, yet no retained trees have been included on the metric. If required, this tree will need to be added to the metric and habitat map prior to determination.

Post-development Habitats

Habitat Creation and Enhancement Tabs

We consider that the proposed habitat creation/enhancement and proposed uplift of 13.76% BNG is achievable and realistic.

Whilst we acknowledge that there are no hedgerows currently on site, as part of the deemed condition, the proposed hedgerows need to be added to the post-development hedgerow creation tab.

Information has been submitted with this application to give confidence that the biodiversity gain hierarchy can be effectively applied to this application, and how conditions should be applied should planning consent be granted.

LNRS

We highlight that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28th November 2025. The LNRS changes how strategic significance is considered and any BNG assessments produced after the LNRS was published can no longer use *Location ecologically desirable but not in local strategy*. All post-development

information must be set to either *Area/compensation not in local strategy/ no local strategy* or *Formally identified in local strategy* depending on whether the site falls within an ACIB.

As the publication of the LNRS occurred before the planning application was submitted, and as its publication alters or could alter the post-development strategic significance score, the strategic significance scores in the biodiversity metric calculation tool for the post-development habitats will need to be reviewed in advance of the deemed condition discharge¹³ to ensure they reflect the published LNRS.

The strategic significance score can be determined through use of the Local Habitat Map, available here: [Local Nature Recovery Strategy mapping portal | Making Space For Nature Kent](#), with guidance on its use available here: [How to use the online mapping tool | Kent and Medway Local Nature Recovery Strategy](#). A guidance document on how to apply strategic significance is available here: [The-role-of-Kent-Medways-Local-Nature-Recovery-Strategy-in-Biodiversity-Net-Gain-Strategic-Significance-.pdf](#).

The site lies within an ACIB with no potential measures which currently match the proposed habitat creation/enhancement action on-site. Changes to the strategic significance scores for the habitats currently proposed on-site are likely to make a significance different to the achievable BNG outcomes for the site. Justification for how the habitat contributes to the Potential Measure must be included as part of the deemed condition discharge if high strategic significance is selected for the habitat type.

On-site Significant Gains

Significant on-site gains are areas of habitat creation or enhancement which contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development. Retention of existing habitat cannot count as an on-site significant gain.

Non-significant enhancements are those whose loss will not significantly decrease the development's biodiversity value e.g., private gardens or container planting. These types of enhancements do not normally require maintenance provisions and so no Habitat Management and Monitoring Plan, legal agreement or commitment to maintain them is required.

We consider the creation Other Neutral Grassland to constitute significant¹⁴ on-site gains. Government guidance states: *"The maintenance of these significant enhancements must be secured with a [legal agreement](#) (planning obligation or conservation covenant) or planning condition for 30 years in the same way as off-site gains. LPAs will consider the most appropriate mechanism and this will need to be agreed at the planning permission stage."*¹⁵

¹³ [LNRS and SS Multiplier Transition Guidance 2.pdf](#); [LNRS & Strategic Significance Multiplier Transition | Local Government Association](#)

¹⁴ We have recently drafted an advice note titled '[Defining significant onsite habitat for Biodiversity Net Gain in Kent and Medway](#)' (March 2025) which outlines our definition of 'significant'. However, this document is awaiting a revision whereby reference to retained habitats counting as on-site significant habitats will be removed.

¹⁵ [Make on-site biodiversity gains as a developer - GOV.UK](#)

It is our view that these significant on-site gains should be subject to a S106 agreement or conservation covenant to secure a monitoring fee and ensure enforceability over a 30-year period. It is our view that monitoring fees should be secured for these significant on-site gains as these gains will need to be subject to monitoring reports across 30 years, which will need to be reviewed (and acted upon as necessary) by the LPA at their own cost. We provided details of suggested monitoring fees in our March 2025 advice note 'KCC Ecological Advice Service suggested BNG Monitoring Fees' which has been distributed to all LPAs in Kent.

Additionally, we recommend conditions for a Habitat Management and Monitoring (HMMP) to secure the significant on-site gains. The HMMP will need to align with the approved biodiversity gain plan and detailed landscaping plans. We also recommend that the conditions secure the retention of trees on site. Although the retention of existing habitat cannot count as on-site significant habitat, the relevant retained habitats are recommended to be secured, as well as the relevant created and enhanced habitats, as without the retained habitats, the 10% biodiversity net gain would not be achieved. Furthermore, there are national and local policies in place to conserve biodiversity. We can provide suggested condition wording once all the further information requested has been submitted.

Ecological Enhancements

The proposed development provides opportunities to incorporate features into the design which are beneficial to wildlife, such as native species planting and the installation of integrated bat/bird nest boxes. We advise that measures to enhance biodiversity are secured as a condition of planning permission, if granted. This is in accordance with Paragraph 193 of the NPPF that "*opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity*".

Two bat boxes, two sparrow terrace boxes and one blue tit box have been proposed on the converted barn. Whilst we are satisfied with the locations of these enhancements, confirmation of the box model (Integrated boxes are preferable but suitable woodcrete/durable boxes would also be acceptable) are required to ensure that the enhancements are durable and long lasting. We advise that these can be secured via condition - we can provide suggested condition wording once all the further information requested has been submitted. Alternatively, as additional information is required prior to determination, if the models of the boxes are confirmed prior to determination, a pre-commencement condition would not be required and an implementation condition could be used instead.

Lighting

Lighting in the vicinity of a bat roost or along commuting/foraging routes could result in disturbance resulting in roost abandonment, which is an offence under Regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended). Artificial lighting has been shown to be particularly harmful to bats along river corridors, near woodland edges and near hedgerows. Local authorities have a duty to ensure impacts upon legally protected species are avoided and impacts upon bats are a material consideration in any planning permission under the Natural Environment and Rural Communities (NERC) Act 2006 and through the National Planning Policy Framework (NPPF) 2024.

Therefore, to mitigate against potential adverse effects on biodiversity, the Bat Conservation Trust/Institute of Lighting Professionals '*Guidance Note 08/23 Bats and Artificial Lighting at Night*' should be consulted in the lighting design of the development.

We advise that the incorporation of sensitive lighting design for biodiversity is submitted to the local planning authority and secured via an attached condition with any planning permission. We can provide suggested condition wording once all the further information requested has been submitted.

Hannah Simmons
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Preliminary Ecological Appraisal. Calumma Ecological Services. 2 September 2024
- Biodiversity Gain Statement and Statutory Metric. Essential Ecology. 9 February 2026
- Proposed Site Block Plan Revision A. JJB Chartered Architects Ltd. 12 February 2026