



ECOLOGICAL ADVICE SERVICE

TO: Katherine Parkin
FROM: Hannah Simmons
DATE : 28 July 2026
SUBJECT: 20260642 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

Condition 4 (Biodiversity Enhancement Plan) – additional information required
Condition 5 (Biodiversity Gain Plan) - additional information required

Condition 4

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 and shall include a detailed, scaled soft landscaping plan, planting schedule and habitat management measures. Details may also include (as appropriate) provision of durable and suitably-placed bat/bird boxes, native wildflower sowing (with details of seed mixes/preparation and management measures), tree planting and the creation of hedgehog highways (by creating small 13×13cm gaps in any close board fencing).

The following enhancements and planting have been proposed on site:

- A wildflower meadow (onsite and offsite Other Neutral Grassland)
- Eight native species trees
- A mixed species native hedgerow
- One bat box
- Four bird boxes
- One log pile

We are satisfied that these are appropriate enhancements for the site and that the location and facing of these enhancements is suitable.

Whilst the location of the habitat enhancements has been shown on the map, the establishment and management of these habitats has not been included. As required by the condition, and in order to ensure that the biodiversity net gain can be achieved over the 30 year period, we advise that an establishment and management plan is submitted.

Condition 5

The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the Preliminary Ecological Appraisal reference number 2025/02/04, for 2 Green Farm Cottage, Green Farm Lane, Shorne Kent, dated 27th June 2025 and prepared by KB Ecology.

BIODIVERSITY GAIN CONDITION

This development requires a 10% mandatory biodiversity net gain under legislation.

The general biodiversity gain condition as per Schedule 7A, Section 13(1) of the Town and Country Planning Act 1990 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.

We have reviewed the submitted documents (Biodiversity Gain Plan and Statutory metric) in relation to the general biodiversity gain condition of permission 20260184 and advise that Insufficient information has been provided to discharge the deemed condition. The following information is required prior to discharge:

- the strategic significance of the created onsite habitats is set to low significance for all habitats
- the strategic significance of the created offsite habitats is set to high significance for all habitats
- the addition of the hedgerow to be created to the metric under the hedgerow creation tab
- evidence that the offsite land has been secured for 30 years
- an establishment and management plan for all on and offsite habitats is submitted.

Onsite habitat works include the creation of Other Neutral Grassland in poor condition and the planting of new native trees in moderate. As these are of medium distinctiveness, they count as significant gains onsite. Off-site BNG can be achieved through the creation of Other Natural Grassland in poor condition.

Table 1 shows a summary of the information as submitted. Further details are provided in Table 2.

Table 1: *To show a summary of our review of submitted information*

Percentage Net Gain Required	Percentage Net Gain Reported for Area Habitats	Percentage Net Gain Reported for Linear Habitats	Net Gain Proposed:	On-site 'significant' Net Gains Proposed
10%	10.34%	Gains not recorded	significant on-site and off-site	Yes

Detailed Comments

Legislation and government standing advice indicates that the information shown in Table 2¹ needs to be submitted to and approved by the local planning authority as part of the 'deemed condition' biodiversity gain plan prior to commencement of development.

References to the biodiversity value of any habitat or habitat enhancement are to its value as calculated in accordance with the biodiversity metric. As such, a copy of the completed biodiversity metric calculation tool, in excel spreadsheet format, has been submitted as part of this submission in conjunction with the biodiversity gain plan. The local planning authority must approve the biodiversity gain plan; without approval, the development may not commence.

Table 2: To show the information required for the biodiversity gain plan under legislation and as indicated by government standing advice, and whether the submitted information is sufficient.

Information Needed	Provided	Comments
The steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat. And, (except for onsite irreplaceable habitats) a description of how the biodiversity gain hierarchy will be followed and where to the extent any actions (in order of priority) in that hierarchy are not followed and the reason for that.	Yes	The applicant is required by law to deliver biodiversity gains in accordance with the biodiversity gain hierarchy, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 Section 37A. We are satisfied that the applicant has appropriately applied the hierarchy to this development.
The relevant date , for the purposes of calculating the pre-development biodiversity value of onsite habitats and if proposing an earlier date, the reasons for using this earlier date.	Yes	With the original application, the applicant has provided the date of 24 September 2025 as the date of the pre-development biodiversity site walkover to establish the habitats present. The walkover established the habitats present at baseline and the biodiversity metric calculations made on 24 September 2025. No habitat degradation was reported or visible on aerial imagery. Accordingly, and as the baseline survey submitted with the planning application was up-to-date, we are content with the applicant's proposed relevant date of 24 September 2025.
The completed biodiversity metric calculation tool(s) , stating the publication date of the tool(s), and showing the calculation of the pre-development onsite value on the relevant date , and post-development biodiversity value. And, evidence that biodiversity gain objective can be met.	No	<u>On-site hedgerow creation</u> Although there is no existing hedgerow habitat on site, it is proposed that a new native hedgerow will be planted. <u>We advise that this must be recorded in the metric under the hedgerow creation tab with a low strategic significance score.</u> We understand that this will not give a net gain percentage as there were no hedgerow on site to begin with, but it is important to record it on the

¹ For development not proceeding in phases. For phased development there are different requirements for the Biodiversity Gain Plan.

Information Needed	Provided	Comments
		metric so that it is correct with regards to future monitoring and ensuring that the hedgerow creation is secured. <u>LNRS</u> As the publication of the LNRS has occurred after planning permission but before submission of the biodiversity gain plan for approval post-determination, and as its publication alters the 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 discharge². The LNRS changes how strategic significance is considered and that <i>Location ecologically desirable but not in local strategy</i> can no longer be used for the created and enhanced habitats. Those that use this category for the baseline can continue to do so as the baseline was set prior to the publication of the LNRS. We note that the submitted biodiversity gain plan indicates that the LNRS has not been consulted in the production of the gain plan. On consulting the Local Habitat Map for the recently published LNRS, we can see that the site lies inside an ACIB. Following review of the metric strategic significance scores we advise that these are incorrect on this basis. We request that: • <u>For onsite habitat creation, the strategic significance is set to low.</u> • <u>For offsite habitat creation, there is scope for the strategic significance to be set to high.</u> The offsite field is in the potential measure of <i>Land management and land use</i> and the creation of Other Neutral Grassland from Cereal Crop could meet the definition for this potential measure. From initial calculations, changing the strategic significance will still mean the site can achieve the mandatory 10% net gain.
Pre-development and post-development plans showing the location of onsite habitat (including any irreplaceable habitat) on the relevant date , and drawn to an identified scale and showing the direction of North.	Yes	The baseline habitat map shows the pre-development habitats and the Biodiversity Enhancement Plans show the post-development habitats.
A description of any irreplaceable habitat on the land to which the plan relates which exist on the relevant date , and any part of the development for which planning permission is granted where the onsite	N/A	None present on site

² [LNRS and SS Multiplier Transition Guidance_2.pdf](#)

Information Needed	Provided	Comments
habitat of that part is irreplaceable habitat, arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.		
If habitat degradation has taken place: • a statement to this effect, • the date immediately before the degradation activity, • the completed biodiversity tool showing the calculation of the biodiversity value of the onsite habitat on that date, and • any available supporting evidence for the value.	Yes	The applicant indicated that no on-site habitat degradation has occurred since 30 th January 2020. This is corroborated by a review of aerial imagery (Google Earth Pro, accessed 28 July 2026).
Where any registered³ off-site biodiversity gain is specified in the plan and allocated to the development: - o The registered off-site biodiversity gain is so allocated (and, if the allocation is conditional, that any conditions attaching to the allocation have been met, or will be met by the time to development begins), and - o The registered off-site biodiversity gain has the biodiversity value specified in the plan in relation to the development.	N/A	
Evidence that any biodiversity credits specified in the plan have been purchased.	N/A	
Name and address of the person completing the Plan, and (if different) the person submitting the Plan.	Yes	
A description of the development and planning permission reference number (to which the Plan relates).	Yes	
A description of arrangements for maintenance and monitoring of habitat enhancement to which paragraph 9(3) of Schedule 7A to the 1990 Act applies (habitat enhancement which must be maintained for at least 30 years after the development is completed).	No	OFF-SITE As off-site habitat is to be provided through land within the ownership of the applicant but is NOT proposed to be provided through a habitat bank provider, then <u>we will need to see evidence that the land has been secured for 30 years.</u> ON-SITE The Biodiversity Enhancement Plan needs to set out the actions needed to create and enhance habitat on-site as well as maintain it for 30 years from the "completion of development"⁶ (Paragraph 9(3) of Schedule 7A of the Town and Country Planning Act 1990). As stated above, whilst the location of the habitat creation/enhancements has been

³ [Make off-site biodiversity gains as a developer - GOV.UK: The Biodiversity Gain \(Town and Country Planning\) \(Modifications and Amendments\) \(England\) Regulations 2024](#)

Information Needed	Provided	Comments
		shown on the map, the establishment and management of these habitats has not been included. As required by condition 4, and in order to ensure that the biodiversity net gain can be achieved over the 30 year period, we advise that an establishment and management plan is submitted.

Hannah Simmons
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Biodiversity Enhancement Plan (parts 1 and 2). Graham Simpkin Planning. 19 June 2026
- Biodiversity Gain Plan. 2 June 2026
- Condition Assessment Sheets and Methodology. July 2024
- Cover Letter. Graham Simpkin Planning. 22 June 2026
- Baseline Habitat Map. KB Ecology. 22 April 2025
- Statutory Biodiversity Metric. KB Ecology. 24 September 2025