



ECOLOGICAL ADVICE SERVICE

TO: *Alison Webster*

FROM: *Jonathan Lynch*

DATE: *20 March 2025*

SUBJECT: *20240826 / Commority Farm, Harvel Road, Meopham, Gravesend Kent*

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 REQUESTED

We have reviewed the ecological information submitted in support of this application and advise that **no further** information is requested from the applicant prior to determination of the planning application. Informative/condition wording is recommended.

ECOLOGICAL CONSTRAINTS AND MITIGATIONS

Our previous comments (of 17 December 2024) requested a full Ecological Impact Assessment as the proposed barn was to be constructed adjacent to a priority/ancient woodland which fell under the Whitehorse Wood and Holly Hill Local Wildlife Site (LWS) designation and would be accessed via the same woodland/LWS.

The proposals and redline boundary have now been amended such that the barn is proposed >15m from the woodland/LWS boundary and the access to the site does not incorporate any priority habitats/designated sites. As such, no Ecological Impact Assessment is required as no impacts are anticipated.

BIODIVERSITY NET GAIN (BNG)

Our previous comments also highlighted that the submitted Small Sites Metric (SSM) had been filled out incorrectly. Given the redline boundary included priority habitats/designated sites, the SSM could not be used and a full Statutory Biodiversity Metric (SBM) filled out by an ecologist was requested.

As the redline boundary has been amended to exclude the woodland/LWS, the SSM has been revised and no SBM/consultation with an ecologist is required.

The new SSM describes the site as 0.34ha of temporary grass and clover leys and a small area of artificial unvegetated land. 0.16ha of grassland will be lost to facilitate the proposed development (the barn itself is <400m²). This habitat loss will be compensated for with the creation of 0.1ha of tussocky arable field margins adjacent to the woodland. These gains are feasible and non-significant, delivering an overall 11.17% biodiversity net gain (BNG). The following condition applies by default but should be included in any decision notice as an informative for avoidance of confusion:

GENERAL BNG CONDITION: *The development hereby permitted is subject to the general 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.

The government's published Biodiversity Gain Plan (BGP) template should be used: [Biodiversity gain plan - GOV.UK](https://www.gov.uk/guidance/biodiversity-gain-plan).

OTHER ENHANCEMENT MEASURES

The previous draft Biodiversity Gain Plan stated that the applicant “*will be fitting owl boxes to the building and providing platforms for sparrows and house martins.*” We suggest the following condition wording to evidence the implementation of these measures:

BIODIVERSITY ENHANCEMENT EVIDENCE: *Within twelve months of first use of the development hereby approved, photographic evidence of the implementation of such habitat creation and biodiversity enhancement measures as are detailed in the approved Biodiversity Gain Plan as well as evidence of the onsite provision of owl boxes and sparrow terraces (both of durable construction and suitably located) shall be submitted to the local planning authority for approval. The approved details shall be thereafter retained.*

Reason: In accordance with paragraph 187 of the NPPF 2024 and local policy CS12.

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

Jonathan Lynch
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Small Sites Metric (Stephen Jones, February 2025)
- Site Plans (BTF, undated)
- Pre-Development Plan Baseline Map and Post-Development Plan Post-Development Map (undated)
- DRAFT Biodiversity Gain Plan (Stephen Jones, November 2024)