



ECOLOGICAL ADVICE SERVICE

TO: Amanda Cue
FROM: Emma England
DATE: 10 September 2026
SUBJECT: 20260815 / Woodlands Farm, Meopham

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:

- Further bat survey of building B1;
- Clarification of the accurate site size within the red line boundary and biodiversity metric calculations that reflect this.

Ecological Impact Assessment

Bats

Roosting Bats

Building B1 was identified as having high suitability to support roosting bats. It had two appropriately spaced surveys in June 2026. Building B2 was identified as having low suitability and had one survey in June 2026. No bats were detected emerging from either building, although we note that the building B1 has not had sufficient survey in line with best practice.

Current guidelines indicate that for high bat roost suitability buildings, a minimum of three emergence surveys, with the use of surveyors and night vision aids should be carried out between May and September. At least two of the surveys should be conducted between May and August. Surveys should be spaced at least three weeks apart and carried out only with a sunset temperature of 10°C¹ or higher and under fair weather conditions (no heavy rain or strong wind). Emergence surveys should cover every Potential Roost Feature (PRF) identified during scoping works of the structure being surveyed.

Further roost characterisation surveys may be necessary if a roost is discovered, unless sufficient information is already available to inform the impact assessment and design of mitigation measures.

The necessary further survey(s) will need to be undertaken in accordance with best practice² and by a suitably qualified and experienced ecologist³. Following further survey, the survey results, along with any necessary mitigation/compensation, will need to be submitted prior to determination of any planning application. This is in alignment with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005⁴ 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”*.

The submitted information recommends that any demolition of buildings B1 and B1a be undertaken outside of the core hibernation period (outside of November to March inclusive). And that at least one hibernation bat box (Schwegler 1WQ Summer and Winter Bat Roost or similar) should be installed on to newly constructed buildings. We recommend that these requirements be secured by condition should planning permission be granted.

Foraging and Commuting Bats

Five bat species were recorded foraging and/or commuting within the Site during the surveys: common pipistrelle, soprano pipistrelle, noctule, brown long-eared and Nathusius' pipistrelle.

A detailed bat sensitive lighting plan(s) should be secured by condition should planning permission be granted, to mitigate for impacts to commuting and foraging bats.

¹ Where the temperature drops significantly below 10°C during the survey, the impact on bat activity will need to be considered. In many cases it is likely to be appropriate to stop the survey and repeat it in more favourable conditions.

² Bats: advice for making planning decisions - GOV.UK (www.gov.uk)

³ Suitably qualified ecologists can be found using either the: [CIEEM Registered Practice Directory](#) or the [Environmental Data Services Directory](#)

⁴ odpm-circ-0605.qxd (publishing.service.gov.uk)

Hazel Dormice

There is suitable habitat on-site for hazel dormice. However, due to the anticipated minor removal of suitable habitat, clearance is recommended to be undertaken via a precautionary works method statement. We consider this approach acceptable.

Reptiles

Reptile presence/likely absence surveys for the site found that reptiles were likely absent from the site.

Japanese Knotweed

A stand of Japanese knotweed was identified near tree T27. We recommend that an invasive plant species removal method statement is included in a construction ecological management plan (CEMP) secured by condition should planning permission be granted for this application.

General

We recommend that a construction ecological management plan (CEMP) for the protection of retained trees and hedgerows, to mitigate for impacts to protected and priority species and to prevent the spread of non-native invasive species is secured by condition should planning permission be granted.

We recommend a detailed sensitive lighting plan(s) is secured by condition should planning permission be granted to mitigate impacts to commuting/foraging bats, hazel dormice and other nocturnal animals.

Habitat features such as bird and bat boxes and hedgehog highways should be secured by condition in line with the NPPF 2026 should planning permission be granted for this application.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications⁵ for development (unless exempt^{6,7}), 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.

⁵ 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.

⁶ Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

⁷ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

Having reviewed submitted information⁸, 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), <u>either on the date of application or earlier proposed date (as appropriate).</u>	Yes	A site visit was carried out by a suitably qualified ecologist 7th May 2026. This is considered acceptable to inform the habitat baseline for this application given the site size, location and habitats reported.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.		The applicant has stated “ <i>The pre-development biodiversity value was calculated on 7 August 2026 using habitat survey and condition assessment information collected on 7 May 2026. No material change, habitat loss or degradation occurred between the survey/calculation date and submission of the planning application</i> ”.
The <u>completed metric calculation tool</u> 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.	Yes	The site is 3.4 hectares in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool (3.2 ha) does not exactly match the reported red line boundary site area as per the application form. This is a discrepancy of 0.2 ha, or 2000 square metres. The de-minimis habitat area for a BNG exemption is 25 square metres. We require further clarification on the site size. The habitat baseline must be accurate prior to determination and must reflect the entire red line boundary only.

⁸ 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.

		<u>Baseline Habitats</u> We are content with the baseline habitat classifications. We highlight to Gravesham Borough Council that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28 th November 2025. 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 (' <u>degradation</u> '), 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.	Yes	None reported or visible on aerial imagery dated March 2026 (Google Earth Pro, accessed 10 th September 2026).
A description of any <u>irreplaceable habitat</u> (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).	Yes	

Post-development Habitats

Habitat Creation and Enhancement Tabs

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.

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.

Table 3, Appendix 2 takes elements from the national and local guidance to show how we have calculated the significance of habitats on-site.

Indicative calculations suggest that the creation/enhancement of habitat, on-site, is likely to constitute significant⁹ 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.”*¹⁰

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 Plan and monitoring reports 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 habitats such as other neutral grassland, scrub, hedgerows and trees. 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.

Off-site Compensation

Off-site compensation is likely to be required for this development.

‘Off-site’ biodiversity gains are any BNG measures proposed outside of the red line boundary. It can be achieved through habitat creation on land owned by the applicant/developer, a third-party provider or through the purchase of BNG units from a habitat bank operator for a site which is registered on the Biodiversity Gain Site Register.

⁹ 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.

¹⁰ [Make on-site biodiversity gains as a developer - GOV.UK](#)

The statutory Biodiversity Gain Plan (BGP) must contain the biodiversity gain site register reference number for any off-site units if these are used. BNG sites must be registered here: [Register a biodiversity gain site - GOV.UK](https://www.makingspacefornaturekent.org.uk/bng/kent-biodiversity-net-gain-site-register/).

If off-site habitat creation is required, we direct the applicant towards the Kent Biodiversity Net Gain Site Register¹¹ available on the Making Space for Nature in Kent and Medway website. Biodiversity Net Gain Guidance for Kent is also available on this website.

If any off-site habitat creation/enhancement is proposed outside of the LPA boundary/National Character Area of the impact site these will be subject to spatial risk penalties.

Where off-site gains are secured on land owned by the developer (but outside the redline boundary), or on third-party land (but not through a 'habitat bank operator'¹²), the biodiversity net gain needs to be subject to a deed of conservation covenants or Section 106 (as appropriate). Section 106 agreement templates are available on the Planning Advisory Service website. It is generally inappropriate to rely solely on conditions to secure off-site biodiversity net gain. The following needs to be secured as part of the off-site biodiversity net gain:

- The submission of a habitat management and monitoring plan (HMMP);
- Notice of HMMP implementation and completion of the habitat creation and enhancement works;
- Timescales for completion of habitat creation, and the submission of a completion report;
- Submission of monitoring reports;
- A habitat monitoring fee to be paid to the local planning authority on every habitat management monitoring event.

The HMMP shall be submitted when the general BNG condition is discharged and shall contain the following information ¹³:

- (a) a non-technical summary;
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;

¹¹ <https://www.makingspacefornaturekent.org.uk/bng/kent-biodiversity-net-gain-site-register/>

¹² A registered BNG Habitat Bank is a site which has been registered on the Biodiversity gain site register and has a site register reference number ([Register a biodiversity gain site - GOV.UK](https://www.makingspacefornaturekent.org.uk/bng/kent-biodiversity-net-gain-site-register/)).

¹³ From Local Government Association

- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.

Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Where off-site gains are to be secured through a 'habitat bank operator' (which has its own legal agreement and HMMP), no additional conditions or section 106 obligations are required, but the deemed condition still applies.

How the BNG is to be achieved will have to be agreed, secured and, where applicable, registered on the Biodiversity Gain Site Register, prior to the submission of the pre-commencement Biodiversity Gain Plan.

Statutory Credits

If it can be demonstrated that onsite biodiversity gains are not possible, the developer will need to demonstrate that they have approached 3 local or national suppliers, habitat banks or trading websites before considering statutory credits. The only exception¹⁴ to this is where a developer has a unit deficit smaller than 0.25 biodiversity units (area or linear), in which case they do not need to approach 3 suppliers before considering statutory biodiversity credits. Statutory credits are intentionally marked up in price to prevent undercutting the off-site market; these prices are reviewed every 6 months. Prices are available here: [Statutory biodiversity credit prices - GOV.UK](#).

It is not usually necessary to secure the biodiversity net gain through additional conditions (other than the deemed condition) or a section 106 agreement.

Submission of Biodiversity Gain Plan

The applicant should submit a biodiversity gain plan form¹⁵ along with supporting information (e.g., legal agreement and habitat management and monitoring plan) once planning permission has been granted to demonstrate in more detail how the proposed biodiversity net gain will be delivered. The biodiversity gain plan must include the following information:

- Information about steps taken or to be taken to minimise the adverse effects of the development on biodiversity;
- The pre-development biodiversity value of the on-site habitat;

¹⁴ See: [Statutory biodiversity credits - GOV.UK](#)

¹⁵ [Biodiversity gain plan - GOV.UK \(www.gov.uk\)](#)

- The post-development biodiversity value of the on-site habitat;
- Any registered off-site biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development;
- Any biodiversity credits purchased for the development; and
- Any other matters that the Secretary of State may be regulations specify.

We advise the local planning authority that there may be conditions attached to the decision notice should planning permission be granted that are linked to the biodiversity gain plan. Wording should be included in such conditions to ensure that it is clear that any documents/plans are produced in accordance with the 'approved biodiversity gain plan'. Relevant conditions where this is likely to be appropriate include soft and hard landscaping conditions, and any other ecology/biodiversity conditions. Other relevant conditions may include drainage conditions.

Emma England
Biodiversity Officer

This response was submitted following consideration of the following documents:

Dream Design Develop (August 2026) Proposed Block Plan. Woodlands Farm, DA13 0RQ.

Dream Design Develop (August 2026) Proposed Landscaping Plan. Woodlands Farm, DA13 0RQ.

Dream Design Develop (August 2026) Trees to be Removed. Woodlands Farm, DA13 0RQ.

PJC (July 2026) Bat Emergence Survey Report. Woodlands Farm, Kent, DA13 0RQ.

PJC (July 2026) Preliminary Ecological Appraisal. Woodlands Farm, Kent, DA13 0RQ.

PJC (August 2026) Biodiversity Net Gain Feasibility Assessment. Woodlands Farm, Kent, DA13 0RQ.

PJC (July 2026) Reptile Survey Report. Woodlands Farm, Kent, DA13 0RQ.

Singh, S. (August 2026) Gravesham Borough Council. Application for Outline Planning Permission with some matters reserved. Woodlands Farm, DA13 0RQ.

Appendix 1: On-Site Significance Calculator

Table 2: On-site Significance of Habitats Calculator

Row No.	On-site Habitat	Present (Y/N)	No. of Habitat Area Units	No. of Hedge Units	Comments
1	Created habitats of medium distinctiveness	Y	5.35	1.34	Creation of species-rich native hedgerow, planting of trees, creation of mixed scrub and other neutral grassland.
2	Created habitats of high distinctiveness	N	-	-	-
3	Created habitats of very high distinctiveness	N	-	-	-
4	Created habitats of low distinctiveness making up many biodiversity units (BU) relative to biodiversity value pre-development	N	0.49	-	Local guidance indicates that low distinctiveness habitats are considered significant where, in total, created low distinctiveness units are 10% or more of the baseline BU value of the site <u>AND</u> the total number of units delivered is above 0.5. This site would not qualify for use of the small sites metric¹⁶. Local guidance indicates that the creation of low distinctiveness habitats should not be considered significant for sites qualifying for the small sites metric. The pre-development total habitat area units are reported to be 25.37. The pre-development total hedge units are reported to be 3.92.
5	Created habitats	N	-	-	-

¹⁶ Small sites are defined as not major developments under the Town and Country Planning (Development Management Procedure) (England) Order 2015). This means:

- residential development where the number of dwellings is between 1 and 9 on a site of an area 1 hectare or less, or if the number of dwellings is unknown, the site area is less than 0.5 hectares, or
- commercial development where floor space created is less than 1,000 square metres or total site area is less than 1 hectare, or
- development that is not the winning and working of minerals or the use of land for mineral-working deposits, or
- development that is not waste development

The statutory biodiversity metric calculation tool (SBMCT) must be used for any development which meets the definition for major development.

It is not possible to use the SSM on all sites defined as 'small sites'. The following criteria also need to be met to use the SSM:

- where only the habitats available in the SSM are present on-site. Any site containing any additional habitats (including riparian zones) not included in the SSM must use the SBMCT
- where no priority habitats are present on-site. Some hedgerows and arable field margins are excluded from the above as these are medium distinctiveness habitats and are included in the SSM
- where no statutory protected sites or habitats are present
- where no European protected species are present

	have increased distinctiveness compared to pre-development (e.g., modified grassland to other neutral grassland)				
6	There have been enhancements proposed to the raise the distinctiveness of retained habitats.	Y	0.07	-	Modified grassland to other neutral grassland
7	There have been enhancements proposed to the condition of retained habitats	Y	2.71	-	Bramble scrub to mixed scrub in moderate condition. Modified grassland from poor to moderate condition.
8	Habitat creation or enhancement of low distinctiveness habitats or higher is significant in area relative to size of development (excluding individual trees and vertical habitats).	Y	Accounted for above		Site is 3.2ha and relevant habitat creation/enhancement is across 0.7176ha (22.43% of the site). This site would not qualify for use of the small sites metric. Local guidance indicates that the creation/enhancement of low distinctiveness habitats should not be considered significant for sites qualifying for the small sites metric.

Total biodiversity habitat units (BU) delivered by relevant creation/enhancement action: 9.96

The above table indicates that the on-site habitat is considered significant because of the creation of species-rich native hedgerow, planting of trees, creation of mixed scrub and other neutral grassland, a sustainable urban drainage feature, modified grassland, and enhancement of modified grassland and scrub.

* National guidance indicates that significant enhancements contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development e.g.,:

- o Habitats of medium or higher distinctiveness in the biodiversity metric;
- o Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development;
- o Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development;
- o Areas of habitat creation or enhancement which are significant in area relative to the size of the development;
- o Enhancements to habitat condition.

** In Kent, guidance indicates that the delivery of above 0.5 (total) relevant biodiversity units is considered the threshold for on-site significance for created or enhanced habitats.

*** Private gardens and container planting are not considered significant enhancements in national guidance and have not been included in the above table.

**** Cropland habitats (except arable field margins, and winter stubble where providing mitigation/compensation for wintering birds), Rhododendron scrub, introduced shrub and culverts cannot be considered significant enhancements in local guidance and have not been included in the above table.