



ECOLOGICAL ADVICE SERVICE

TO: Adeoye Lawal
FROM: Hannah Simmons
DATE: 09 March 2026
SUBJECT: 20250943 / Tudor Cottage, 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

We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination. Recommended condition/informative wording is provided below.

However, we wish to bring to attention to the following point that **may require addressing** if the proposed works to the adjacent eastern hedgerow are to fall under this planning permission as it is currently outside the redline boundary.

Hedgerows

Adjacent to the eastern side of the redline boundary is potentially a hedgerow that is proposed to have a gate put in it. Figure 1 in the [Appendix](#) shows that a hedgerow was present after 30 January 2020, but it is unclear from subsequent aerial photography if it has been removed (Figure 2). The Proposed Stables plans states that a "*Proposed post and rail fence with wooden field gate and reinstated native hedgerow to mark boundary of residential curtilage.*" This implies that the hedgerow has been removed and it is proposed to replace it. Regardless of the hedgerow being in place or removed, works are proposed to take place to it, either to replant or alter it to fit a gate.

As it is currently outside the redline boundary, we are satisfied that the hedgerow does not need to be included in the metric calculations. However, **if these proposed works are to be included within this planning permission**, we advise that the redline boundary is altered to include the affected area and that the hedgerow baseline is included in the metric calculation prior to determination.

If there is no need to alter the redline boundary, then the following advice applies:

A summary of our review of the submitted biodiversity net gain information is provided below. Detailed comments on the submitted ecological and biodiversity net gain information follow the subheadings below.

Table 1: To show a summary of our review of submitted biodiversity net gain information

Percentage Net Gain Required	Percentage Net Gain Reported for Area Habitats	Net Gain Proposed:
10%	15.52%	1 – all on-site

Precautionary Measures

We are satisfied that the proposed mitigation set out in section 11 of the Preliminary Ecological Appraisal (PEA) for badgers, hedgehogs, and reptiles, identified as having potential to be on site, are sufficient.

We advise that the applicant follow the precautionary mitigations set out in section 11 of the PEA and advise that if planning permission is granted, a **condition is included to secure those precautionary measures in a Construction Environmental Management Plan (CEMP)**. We have not provided suggested condition wording as we feel Gravesham Borough Council would be best placed to write that condition. We suggest that the following bullet point is included in the condition wording:

- *Inclusion of section 11 of the Preliminary Ecological Appraisal (Native Ecology, 22 July 2025), which covers the precautionary measures for badgers, hedgehogs, and reptiles.*

As part of this, we highlight that the current management of the site must continue so as not to develop suitable habitat which may encourage the presence of protected species

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications¹ for development (unless exempt^{2,3}), 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.

¹ 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.

² Biodiversity net gain: exempt developments - GOV.UK (www.gov.uk)

³ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (legislation.gov.uk)

Having reviewed submitted information⁴, 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 2: To show whether the applicant has met the minimum validation requirements

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 on 12/06/2025. 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.	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.	Yes	The site is 325 square metres (0.0325 hectares) in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool does not match the reported red line boundary site area as per the application form. However, updated plans have been proposed since the application form was submitted, therefore we are satisfied that there is a discrepancy in this case. 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 28th November 2025. The LNRS was published after the 'relevant

⁴ 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.

Information Needed	Provided	Comments
		date'. As the LNRS was published after the relevant date, the 'pre-development' biodiversity value does not need to be updated. As the publication of the LNRS has occurred whilst the planning application is live, 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 discharge⁵. 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. We consider that the proposed habitat creation and proposed uplift of 15.52% BNG is achievable and realistic.
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 ').	Yes	None reported or visible on aerial imagery dated 6 August 2025 (Google Earth Pro, accessed 9 March 2026 date)
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,	-	None reported.

⁵ [LNRS and SS Multiplier Transition Guidance_2.pdf](#)

Information Needed	Provided	Comments
that exists on the date of application, (or an earlier date).		
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	

The habitat baseline must be correct prior to determination, but full details of how the proposals will deliver biodiversity gains are not strictly required until submission of the pre-commencement Biodiversity Gain Plan. However, it is advisable to seek an indication prior to determination as, it gives an indication of how the biodiversity gain hierarchy will be applied, and if granted consent, the project cannot commence until this information has been submitted to and approved by the local planning authority. This information will also provide sufficient indication as to how conditions need to be applied should planning permission be granted for this application.

The government's standing advice on BNG states (under paragraph 002 Reference ID: 74-002-20240214): *"[BNG] is not just a post-permission matter. To ensure the biodiversity gain objective is met and the condition can be discharged successfully, it is important biodiversity net gain is considered throughout the planning process."*

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.

Submission of Biodiversity Gain Plan

We advise that the following information should be submitted as part of the 'deemed condition' discharge as appropriate:

- How the biodiversity gain hierarchy has been applied;
- The relevant date for the habitat baseline and reason for choosing an earlier date (if relevant);
- The completed biodiversity metric calculation tool(s) based on final detailed designs;
- Pre-development and post-development plans;
- A description of any irreplaceable habitat present on the relevant date;
- Information concerning any relevant habitat degradation;
- Any registered off-site biodiversity gain, evidence of its value and evidence that it has been allocated to the development;
- Evidence of the purchase of any biodiversity credits;
- Name and address of the person completing/submitting the Plan;
- A description of the development and planning permission reference number to which the Plan relates;

- A description of the arrangements for maintenance and monitoring of the habitat enhancement where applicable.

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.

Significant on-site 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 of urban tree habitats to constitute significant⁶ 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."*⁷

However, due to the amount of habitat created (0.04 units), and ease with which it can be created and maintained, it is not considered proportionate to implement LPA oversight through the collection of monitoring fees and the submission and approval of monitoring reports to the LPA. It is appropriate to recommend a Habitat Management and Monitoring Plan (HMMP) be included on the decision notice if planning permission is granted. The HMMP will still include monitoring by an ecologist/management company where LPA oversight is not considered necessary.

The suggested conditions below show how on-site biodiversity net gain can be secured by condition; it may be used with a planning obligation securing any monitoring contributions.

Suggested Condition Wording:

⁶ 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.

⁷ [Make on-site biodiversity gains as a developer - GOV.UK](#)

The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the Biodiversity net gain assessment: design stage, for Tudor Cottage, Meopham, dated 16 December 2025 and prepared by Native Ecology.

Reason: To ensure the proposals are in accordance with details submitted and considered as part of the planning application, in accordance with [insert relevant policy].

The above condition is not a statutory requirement but unless imposed there would be no requirement that the Biodiversity Gain Plan submitted for approval to be in accordance with any biodiversity or ecological information submitted with the planning application. This condition may not be appropriate for some outline planning permissions where the post-development biodiversity value will not be known until reserved matters have been approved.

This is not a statutory requirement; imposing this may give additional certainty that the Biodiversity Gain Objective for the development will be met. It also provides flexibility for subsequent approvals of an overall gain plan.

Habitat Management And Monitoring Plan

The below condition is recommended as the scheme must 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"⁸ (Paragraph 9(3) of Schedule 7A of the Town and Country Planning Act 1990).

Neither the statutory definition of the biodiversity gain plan⁹ nor the current DEFRA biodiversity gain plan template require management and maintenance measures to be specified¹⁰. As a result, the statutory condition does not on its own secure compliance with the approved biodiversity gain plan (including the implementation of any habitat creation and enhancement works or their maintenance for a 30-year period). The delivery of the gain envisaged by the HMMP needs to be secured by condition or, where necessary, legal agreement.

The suggested condition wording below also includes reference to habitat retention. Retention of existing habitat cannot count as on-site significant habitat. Only created and enhanced habitats can count as on-site significant habitats. However, the retained habitats are recommended to be secured as well as the 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.

Suggested Condition Wording:

The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan (submitted as part of the deemed condition discharge application), and based on the most up-to-date and/or relevant ecology surveys as determined by a suitably qualified ecologist, has been

⁸ PPG 015 Reference ID: 74-015-20240214

⁹ Paragraph 14(2) of Schedule 7A TCPA 1990

¹⁰ The DEFRA biodiversity gain plan template acknowledges a Habitat Management and Monitoring Plan (HMMP) can be annexed to the approved plan. The statutory condition does not require the HMMP to be approved even if it is attached.

submitted to, and approved in writing by, the local planning authority. The Plan shall include:

- a) a non-technical summary;*
- b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- c) the planned habitat retention, creation and enhancement works (including detailed landscaping plan(s) and planting schedule(s)) to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- 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 retained, created or enhanced habitat.*

The retained, created and/or enhanced habitat specified in the approved HMMP shall be implemented, managed, maintained and monitored in accordance with the approved HMMP.

Reason: To ensure the development delivers the required biodiversity net gain on site in accordance with [local policy reference] and Schedule 7A of the Town and Country Planning Act 1990.

Ecological Enhancements

Paragraph 187(d) of the NPPF 2024 states: “Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.” The updated NPPF encourages habitat features. These are in addition to the requirements of mandatory 10% biodiversity net gain.

Suggested biodiversity enhancements include the provision of durable bird/bat boxes (for house sparrows, starlings, swifts or as appropriate to the development and preferably integrated into new structures), the creation of artificial refugia for reptiles/amphibians, and/or creation of bug hotels/bee bricks for invertebrates. Where placed on buildings, bat and bird boxes should be clearly visible on elevations plans.

Suggested Condition Wording:

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:

- Provision of suitably placed bat and/or bird boxes, with the exact locations, make and model and height from ground level shown on scaled plans suitable for construction. In the case of building mounted boxes, scaled elevation plans shall be provided. Boxes for breeding birds shall be targeted at S41 priority species and/or red/amber listed species as listed within the latest British Trust for Ornithology Birds of Conservation Concern report. Boxes shall be building integrated and/or constructed of woodcrete to ensure durability;*

- *The provision of bee bricks and/or the provision of log piles/artificial refugia for reptiles and amphibians. The exact locations, make and model, height from ground level, size and construction materials shall be shown on scaled plans suitable for construction.*

The Plan shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

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

Hannah Simmons
Biodiversity Officer

This response was submitted following consideration of the following documents:

- BNG: baseline habitat assessment. Native Ecology. 16 December 2025
- Preliminary Ecological Appraisal (PEA). Native Ecology. 22 July 2025
- Biodiversity net gain assessment: design stage. Native Ecology. 16 December 2025
- Biodiversity net gain assessment: Feasibility stage. Native Ecology. 24 July 2025
- Proposed Stables. Bloomsfields. 22 December 2025

Appendix - Hedgerow figures



Figure 1. Google Earth imagery of the site showing a hedgerow boundary between the eastern side of the site and adjoining property, dated 23 April 2020 (accessed 5 March 2026).



Figure 2. Google Earth imagery of the site showing a missing or severely reduced hedgerow boundary between the eastern side of the site and adjoining property, dated 14 April 2024 (accessed 5 March 2026).