



ECOLOGICAL ADVICE SERVICE

TO: *Alison Webster*

FROM: *Emma England*

DATE: *30 October 2025*

SUBJECT: *20250889 / Buckland Farm, Higham*

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:

- An ecological impact assessment containing the full survey results and further impact assessments, as well as any necessary avoidance, mitigation and compensation measures; and
- Update of the biodiversity metric calculation tool to match the reported size of the red line boundary.

Ecological Impact Assessment

A full ecological impact assessment has not been completed for the site. The submitted preliminary ecological appraisal report makes recommendations for further survey and assessment. As such sufficient information prior to determination of the application is not available.

Office of the Deputy Prime Minister (ODPM) Biodiversity and Geological Conservation Circular 06/05 Paragraph 99 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 industry standard report for submission with a planning application is an Ecological Impact Assessment (EIA) as per ‘*Guidelines for Ecological Impact Assessment in the UK and Ireland*’ (CIEEM, 2018¹). This guidance states: “*A PEA report does not replace an EIA, as it normally contains recommendations for further surveys or general design advice to a developer, rather than a detailed assessment of the effects of a finalised scheme, with all required ecological surveys completed. For very straightforward projects, where no further ecological surveys are needed, an EIA Report can be produced following completion of the PEA.*” Therefore, all further necessary surveys, as well as a summary of the mitigations and compensations required for all elements of the project should be submitted as an EIA prior to determination of the planning application.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications² for development (unless exempt^{3,4}) 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 information⁵, 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

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 preliminary ecological appraisal was carried out 26 th January 2025. Given the nature of the site and findings during the survey, this is considered acceptable to inform the application.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	-	-
<u>The completed metric calculation tool</u> showing the calculations of the pre-development biodiversity	Yes	The site is 1.68 hectares in size, according to the information in the

¹ [EIA-Guidelines-v1.3-Sept-2024.pdf](#)

² 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.

³ Biodiversity net gain: exempt developments - GOV.UK ([www.gov.uk](#))

⁴ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 ([legislation.gov.uk](#))

⁵ 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.

<p>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.</p>		<p>application form. The habitat area reported in the biodiversity metric calculation tool (1.65 ha) does not match the reported red line boundary site area as per the application form. There is a small discrepancy of 300 square metres.</p> <p>This small discrepancy should be corrected prior to determination to ensure the baseline habitat calculations for the site are accurate.</p> <p>Proposed post-development habitats appear realistic and achievable.</p>
<p>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:</p> <ul style="list-style-type: none"> • 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	<p>None reported and none visible on aerial imagery (Google Earth Pro, accessed 30th October 2025).</p>
<p>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).</p>	-	<p>None reported.</p>
<p>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).</p>	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.

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 can be applied should planning consent be granted.

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

Emma England
Biodiversity Officer

This response was submitted following consideration of the following documents:

Fryer, J. (September, 2025) Application for Outline Planning Permission with some matters reserved. PP-14195546. Bucklands Farm, Chalk Road, Higham.

RammSanderson (August 2025) BIA Baseline Habitat Plan. Chalk Road, Higham.

RammSanderson (August 2025) BIA Proposed Habitat Plan. Chalk Road, Higham.

RammSanderson (June 2025) Preliminary Ecological Appraisal Report (PEAR). Chalk Road, Higham.

Saunders (July 2025) Location Plan. Land off Chalk Road, Lower Higham.