



ECOLOGICAL ADVICE SERVICE

TO: Katherine Parkin
FROM: Emma England
DATE: 17 April 2026
SUBJECT: 20260026 - Chambers 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: SUFFICIENT INFORMATION

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 in Appendix 1.

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/Loss Reported for Area Habitats	Percentage Net Gain/Loss Reported for Linear Habitats	Net Gain Proposed: 1 – all on-site; 2 – no significant on-site and off-site; 3 - significant on-site and off-site	On-site 'significant' Net Gains Proposed (Yes/No)
10%	+10.41%	+13.80%	1 – all on-site	No

Using the national and local guidance regarding significance, we consider that the on-site biodiversity net gain should not be treated as significant and so does not require securing for 30-years. Even though there is no on-site significant habitat identified on-site for

legislative biodiversity net gain, we recommend that a simple ecological enhancement plan secure habitat retention, creation and enhancement works at the site under planning policy.

Biodiversity Net Gain (BNG)

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.

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 an ecologist 20 th November 2025. This is considered acceptable to inform the habitat baseline for this application given the site size, location and habitats reported. The date the on-site pre-development biodiversity value was calculated has been given as the 20 th December 2025. This is the date the biodiversity metric calculation tool was completed.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	Yes	The planning application was received 12 th January 2026 and the assumed proposed 'relevant date' of 20 th December 2025 pre-dates this. We consider the proposed earlier date acceptable.
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 5,768 square metres (0.58 hectares) in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool matches the reported red line boundary site area as per the application form. 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.

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)

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.

		The LNRS was published before the 'relevant date'. We have reviewed the submitted biodiversity metric calculation tool in line with the LNRS and consider that the strategic significance scores are accurate. 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/enhancement 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'), 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. There are habitat changes visible on aerial imagery between May 2018 and May 2025. However, the changes since April 2020 are not considered to have resulted in habitat degradation.
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).		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	

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.

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.

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

There is no on-site significant habitat identified on-site for legislative biodiversity net gain. However, we recommend that a simple ecological enhancement plan secure habitat retention, creation and enhancement works at the site under planning policy.

Ecological Impact Assessment

Precautionary working measures are recommended within the submitted ecology report during site clearance and construction. These measures should be secured by condition should planning permission be granted.

Emma England **Biodiversity Officer**

This response was submitted following consideration of the following documents:

- Preliminary Ecological Assessment & Biodiversity Net Gain Plan; JW Biodiversity Management;
- Baseline Layout; JW Biodiversity Management;
- Proposed Layout; JW Biodiversity Management;
- Statutory BNG Metric

Appendix 1: Suggested Condition/Informative Wording

Biodiversity Net Gain

Deemed Condition

Please note that certain information is required to discharge the biodiversity gain condition. The government's published Biodiversity Gain Plan (BGP) template⁵ should be submitted with the application to discharge the biodiversity gain condition. This template also indicates which other documents and plans should support the application for discharge.

If planning permission is granted, the statutory biodiversity gain condition (and its reason for imposition) should not be included on decision notices as a condition. The condition cannot be varied or removed. An application must be made to discharge it as any other condition.

We recommend an informative in line with the Planning Practice Guidance (Paragraph: 026 Reference ID: 74-026-20240214)¹² should be included on the decision notice to set out the legislative requirements in relation to biodiversity net gain.

Biodiversity Enhancement Plan

Suggested Condition Wording:

No development shall commence until a Biodiversity Enhancement Plan (BEP) has been submitted to and approved in writing by the local planning authority. The Plan shall include full details of the biodiversity enhancements shown on a detailed, scaled soft landscaping plan, planting schedule and include appropriate habitat management provisions to be implemented on-site so that the habitats can achieve the targeted biodiversity net gain. The Plan shall be based on Proposed Layout v2 by JW Biodiversity Management dated 19th December 2025 for Chambers Farm, ME3 8ER – East Site.

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.

Ecological Mitigation

Suggested Condition Wording:

From commencement of works (including site/vegetation clearance), and for the duration of construction, all mitigation for protected and priority species and habitats shall be carried out in accordance with the details contained in section 5 of the JW Biodiversity Management Preliminary Ecological Assessment and Biodiversity Net Gain Plan for Chambers Farm, East, Town Road, Higham, Kent, ME3 8ER (RP-171025-01) dated 20th March 2026.

⁵ [Biodiversity gain plan - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/115111/Biodiversity_gain_plan_-_GOV.UK.pdf)

Appendix 2: On-Site Significance Calculator

Table 3: 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	0.01	-	Planting of trees.
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/A	-	-	This site would qualify for use of the small sites metric ⁶ . Local guidance indicates that the creation of low distinctiveness habitats should not be considered significant for sites qualifying for the small sites metric.
5	Created habitats have increased distinctiveness compared to pre-development (e.g., modified grassland to other neutral grassland)	Y	-	-	Planted trees accounted for above.
6	There have been enhancements proposed to the raise the distinctiveness of retained habitats.	N	-	-	-
7	There have been enhancements proposed to the condition of retained habitats	Y	0.24	-	Improved condition of area of ruderal habitat.
8	Habitat creation or	N/A	-	-	This site would qualify for use of the

⁶ 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

enhancement of low distinctiveness habitats or higher is significant in area relative to size of development (excluding individual trees and vertical habitats).				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: 0.25				
The above table indicates that the on-site habitat is not considered significant because less than 0.5 biodiversity units will be delivered as part of this development.				

* 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.