



## ECOLOGICAL ADVICE SERVICE

**TO:** Gary Edwards

**FROM:** Jonathan Lynch ACIEEM

**DATE:** 20 November 2025

**SUBJECT:** 20250303 / Land Rear Of Hilary Cottage Hermitage Road Higham

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*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.*

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### **SUMMARY – FURTHER INFORMATION REQUESTED**

We have reviewed the ecological information submitted in support of this application and advise that **further** information is requested from the applicant prior to determination of the planning application. This includes:

- A revised BNG assessment.

### **ECOLOGICAL CONSTRAINTS AND MITIGATIONS**

The submitted Ecological Impact Assessment & Biodiversity Net Gain Assessment (Kent Sussex Ecology, July 2025) has not identified any ecological constraints on the proposals given their small scale/lack of impacts to habitats likely to support protected/priority species. No further surveys are requested.

### **BIODIVERSITY NET GAIN (BNG)**

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications received in England (with a few exemptions) must deliver at least a 10% biodiversity net gain (BNG) from April 2<sup>nd</sup> 2024. Where required, the Statutory Biodiversity Metric will need to be used to demonstrate a minimum 10% biodiversity net gain. Local policy may request a higher level of net gain. Significant gains will need to be secured for at least 30 years.

Based on the submitted BNG assessment and metric, it is unclear whether BNG applies to these proposals. The site boundary in the Ecological Impact Assessment & Biodiversity Net Gain Assessment (Kent Sussex Ecology, July 2025) is significantly different to the site boundary in the Location Plan (March 2025). The BNG assessment also indicates that the existing container will be removed and some 67m<sup>2</sup> of grassland will be lost to facilitate the proposed new stables, although the block plans indicate the stables will be constructed on hardstanding. If the block plans are correct, the application is almost certainly exempt from BNG under *de minimis*. The area of grassland proposed for enhancement also falls outside of the redline boundary of the site which is not advisable (offsite gains are more difficult to secure, requiring registration and legal agreements). The site boundary should be amended, or it should be clarified whether BNG actually applies.

No ecological enhancements are recommended in the Ecological Impact Assessment & Biodiversity Net Gain Assessment (Kent Sussex Ecology, July 2025). In the published 'Guidelines for Ecological Impact Assessment in the UK and Ireland' (CIEEM, September 2024), it is recommended that biodiversity enhancements "*should be incorporated into scheme design and assessed within the EclA*".

**Jonathan Lynch ACIEEM**  
**Biodiversity Officer**

This response was submitted following consideration of the following documents:

- Location Plan (March 2025)
- Existing Block Plan (Building Drawings, March 2025)
- Proposed Block Plan (Building Drawings, March 2025)
- Ecological Impact Assessment & Biodiversity Net Gain Assessment (Kent Sussex Ecology, July 2025)
- Small Sites Metric (Kent Sussex Ecology, July 2025)