



ECOLOGICAL ADVICE SERVICE

TO: Lucy Hankin

FROM: Emma England

DATE: 25 November 2025

SUBJECT: 20240943 / Cobham Sports Association Recreation Ground, Cobham

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, provided it is confirmed that the submitted metric calculations accurately reflect the red line boundary. 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%	+49%	N/A	1 – all on-site	No

Using the national and local guidance regarding significance, we consider that the on-site biodiversity net gain (excluding private gardens) should not be treated as significant and so does not require securing for 30-years.

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.

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 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.	No	The application form indicates that the applicant understands a de-minimis exemption to apply. However, the area of affected habitat (44.88 square metres of garden) is just above the amount of affected habitat required to qualify for de-minimis (25 square metres). We therefore consider that mandatory 10% BNG does apply to these proposals.
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate) .	Yes	A site survey was carried out 6 th August 2025 by a planning consultant. Given the types of habitats found to be present on-site and evidenced through aerial imagery and photographs of the site, we are content that this individual has the competency to identify the habitats present on-site. The date of 6 th August is 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.	-	-
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 74.25 square metres in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool (1107.43 square metres) does not match the reported red line

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.

		boundary site area as per the application form. The habitat area reported in the metric calculations and shown on plans needs to reflect the red line boundary. Confirmation should be sought from the applicant that the submitted metric calculations accurately reflect the red line boundary. We are content with the baseline habitat classifications, although we query whether the artificial unvegetated surface should be instead recorded as developed land; sealed surface, if it represents the footpath. However, this makes no difference to the results of the calculations, although it would benefit from being accurate and updated. A short description of the habitat types in the user comments section of the metric calculation tool would have been helpful for clarity. A biodiversity net gain is proposed to be achieved through the planting of two trees.
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.	No	The applicant has not provided a statement to this effect, although aerial imagery dated between April 2020 and August 2025 does not show evidence of any on-site 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	

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.

There is no on-site significant habitat identified on-site for legislative biodiversity net gain. However, we recommend that a typical landscaping condition secure the establishment of the proposed trees on-site to ensure that a 10% biodiversity net gain is achieved for this development.

Table 3, Appendix 2 takes elements from the national and local guidance to show how we have calculated the significance of habitats on-site. This site qualifies for use of the small sites metric.

Ecological Impact Assessment

No ecological information has been submitted with this application. As a result of reviewing the data available to us and the information submitted with the planning application, we advise that none will be needed. This is due to the small scale, nature and location of the proposals and limited potential for impacts to protected and priority species and habitats⁵.

Emma England **Biodiversity Officer**

This response was submitted following consideration of the following documents:

Bloomfields (October 2025) Proposed Elevations. P.3621.070.C.

Bloomfields (September 2025) Existing Elevations. /3621.050.A.

Bloomfields (September 2025) Site Location Plan. /3621.010.A.

Broadley, C. (October 2025) Gravesham Borough Council. Application for Planning Permission. PP-13458016. Cobham Sports Association, DA12 3BN.

Unauthored (Undated) Planning, Design and Access Statement. Sports Pavillon and Recreation Grounds, Cobham Village, DA12 3BN.

Unauthored (Undated) Habitat Plans. Baseline and Post-Development.

⁵ We consider we have taken a proportionate approach to ensure that the provision of information within the planning application is appropriate to the environmental risk associated with the development and its location in line with Clause 4.1.2 of BS42020 (BSI, 2013).

Appendix 1: Suggested Conditions/Informatives

Biodiversity Net Gain

Deemed Condition Informative

Please note that certain information is required to discharge the biodiversity gain condition. The government's published Biodiversity Gain Plan (BGP) template¹² 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.

Landscaping Condition

Habitat creation and enhancement on-site can be secured by condition. We do not consider that any of the proposed on-site habitats shall likely qualify as significant⁹ enhancements in line with mandatory 10% biodiversity net gain, requiring on-going oversight by the Local Planning Authority and securing for 30 years. However, although no on-going monitoring and oversight by the Local Planning Authority is considered likely to be necessary, to secure on-site compensation for lost habitats, a simple and standard landscaping condition should secure the planting of the proposed trees and their reinstatement should they die within 5 years of planting.

This is because the proposed habitats still contribute to the mandatory 10% biodiversity net gain that needs to be secured as part of the development and the proposed habitats will still require some form of management to achieve the desired outcomes for biodiversity. Providing on-site enhancements will also meet national and local policy requirements.

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	0.0249	-	Planting of two small 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	-	-	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	-	-	Two trees have higher distinctiveness than vegetated garden.
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	N	-	-	-
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).	N/A	-	-	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: 0.0249					
The above table indicates that the on-site habitat is not considered significant because as the created habitat is under 0.5 biodiversity units.					

* 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.