



ECOLOGICAL ADVICE SERVICE

TO: Lisa Fisher
FROM: Philippa Bromley
DATE: 09 June 2025
SUBJECT: 20250321: Oak Tree Stables, 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:

- Ecological Impact Assessment

FULL COMMENTS

This application is for the conversion of integral carport into habitable residential space and enclosure of the existing open front with addition of two windows. No ecological information has been submitted with this application. After reviewing the data available to us and the information submitted with the planning application, we advise that further information be sought from the applicant regarding the potential for ecological impacts to arise.

While we acknowledge that the proposed works are located on hard standing and that it is likely no habitat will be impacted, we note that this area was included in a previous planning application 20180381, which was accompanied by an ecological mitigation strategy.

As detailed in the Mitigation and Enhancement Plan (Loyd Bore, November 2020), ecological enhancements were incorporated into the stables, including bird nest bricks, barn owl loft with bat roost enhancements. The accompanying Bat Roost Features document (Loyd Bore, November 2020) illustrates the inclusion of gaps in the eaves which could provide bat roosting and bird nesting opportunities. Specifically, section 4.35 of the mitigation strategy (Loydbore November 2020) states that designs would be “providing gaps under tiles that allow access to areas of wooden sarking behind, providing suitable access points along the eaves and under tiles using bat access tiles or similar”. Given the proximity of the proposed development to these features, there is reasonable potential for protected species presence and therefore could be adversely impacted by this development.

Habitats and features (Arable and horticultural land, improved grassland and onsite Wildlife Enhanced Area) are present on and around the site, indicating ecological value and the potential for protected species presence that must be taken account of in the planning decision. As such, an Ecological Impact Assessment (EclA) should be undertaken by a suitably qualified ecologist.

The EclA will include the following:

- Details of the impacts of development proposals on the ecological baseline established via a Preliminary Ecological Appraisal (PEA) and any necessary additional surveys undertaken;
- Details of any necessary and achievable ecological mitigation and/or compensation measures;
- Details of ecological enhancement measures, and;
- Provision of sufficient information to determine whether the project accords with relevant nature conservation policies and legislation.
- Current Site Photos

To ensure that the planning determination is adequately informed in respect of all potential ecological impacts, we advise that the EclA is sought prior to determination of the planning application. This is in accordance with paragraph 99 of the Office of the Deputy Prime Minister (ODPM) Circular 06/2005 which 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”*.

Under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 through 195 of the NPPF 2024, biodiversity should be maintained and enhanced through the planning system.

Biodiversity Net Gain

We consider this application exempt from statutory BNG because it is a householder application as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

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

Philippa Bromley
Graduate Biodiversity Officer

This response was submitted following consideration of the following documents:

- Ecological Mitigation Strategy Gore Green Farm (Loyd Bore, November 2020)
- Site Location Plan
- Proposed Block Plan (March 2025)
- Existing Block Plan (March 2025)