



ECOLOGICAL ADVICE SERVICE

TO: *Alison Webster*

FROM: *Hannah Simmons*

DATE: *28 April 2026*

SUBJECT: *20250993 Land Adj To Longfield Rd, Meopham*

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 outline mitigation/compensation strategy for the loss of skylark breeding territory on site
- Clarification on the redline boundary and site area within the BNG metric - Either the redline boundary needs to be adjusted or the metric altered to account for the area in the blue line boundary as off-site.

Protected Species

Breeding Birds

Wintering bird surveys were carried out in Winter 2024/2025 and breeding bird surveys were carried out in Spring 2025. However, further wintering bird surveys were cancelled after a bird scarer had been installed in the field which would reduce the suitability of birds being recorded on site.

The May breeding bird survey recorded one singing skylark outside the site boundary to the southwest, that could point to a breeding pair of skylarks being present on site. No other birds of conservation concern were recorded during the surveys. Skylark are a Birds

of Conservation Concern 'red listed' species and are listed as a Species of Principal Importance (also known as 'priority' species) under S41 of the NERC Act 2006. Their conservation must therefore be considered as part of any local planning authority's biodiversity duty¹. As such, suitable mitigation in the form of additional breeding territory to compensate for the loss of one breeding territory is required. Therefore we advise that an outline mitigation/compensation strategy should be submitted prior to determination.

With regards to submitting an outline mitigation/compensation strategy, it will be important to demonstrate that it will be possible to secure the mitigation/compensation through condition/obligation, and that the mitigation/compensation achievable.

A map should be provided to show as a minimum where there is possible mitigation land. There should be an explanation of the type of fields to be targeted (size, shape, field boundaries) and how it has been assessed that the compensation measures proposed are capable of supporting the additional birds. The number of skylark territories proposed within any plot of land should be determined based on the minimum field sizes recommended in guidance (5ha bounded by open field boundaries or short hedges, 10ha if bounded by tall hedges or woodland) and scientific evidence/ monitoring data for other similar projects should support the proposed approach with regards to any enhancement measures to increase territory numbers within existing areas of land.

We note that any off-site mitigation will need to be secured via a legal agreement.

Badgers

Badger surveys undertaken in Spring 2025 found that there are two active badger setts within 30m of the site to the south within the adjacent woodland. Additionally, latrines and badger paths were also recorded along the site boundary.

The cropland offers little suitable habitat to badgers, and the modified grassland (which is proposed to be retained) offers some foraging opportunities for badgers. Therefore, it is possible that badgers may be on site. However, no works (other than tree planting) are proposed within 30m of the setts. Therefore we are satisfied that a badger licence is not required.

We advise that no more than one month prior to site/vegetation clearance/construction, a precautionary walkover of the site and a 30m radius around the site should be undertaken, by a suitably qualified ecologist, to search for active badger setts. If a badger sett is discovered on site, or within 30m of site, a suitably experienced ecologist will need to provide advice on any necessary further survey and mitigations for badgers. This should include whether a badger mitigation licence from Natural England is required prior to the commencement of any works on site. This and other precautionary measures to ensure that impacts to badgers are minimised can be conditioned if planning permission is granted - we will provide suggested wording once the requested additional information has been submitted.

¹ [Complying with the biodiversity duty - GOV.UK](https://www.gov.uk/guidance/complying-with-the-biodiversity-duty)

Reptiles and Amphibians

As there is little suitable habitat (modified grassland) on site for reptiles and amphibians, plus what is there is proposed to be retained, we are satisfied that it is unlikely that they will be present on site or will be impacted by the proposal.

As it is a small risk that reptiles may be using the site, we are satisfied that precautionary measures will be sufficient for the clearing of the habitat. If planning permission is granted, we advise that precautionary measures are included in a Construction Environmental Management Plan (CEMP) and secured via a condition - we will provide suggested wording once the requested additional information has been submitted.

Bats

A Ground Level Tree Assessment (GLTA) was undertaken in Summer 2025. Two trees were identified as offering limited roosting potential for individual/low numbers of crevice dwelling bats and therefore were classified as PRF-I. Currently the trees are proposed to be retained, but should these trees require felling, we are satisfied that no further surveys are required and that felling can be completed under precautionary felling measures.

Dormice

Surveys were undertaken in Spring-Autumn 2025 and no signs of dormouse were recorded. We are satisfied that dormouse mitigation does not need to be considered as part of this proposal.

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	Yes	

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.

Information Needed	Provided	Comments
subject to the biodiversity gain condition.		
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 a suitably qualified ecologist 26 February 2025. This is considered acceptable to inform the habitat baseline for this application given the site size, location and habitats reported.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	Yes	
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.	No	The site is 5.68 hectares in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool (6.24 hectares) does not match the reported red line boundary site area as per the application form. This is a discrepancy of 0.56 hectares. This is due to the metric incorporating some of the land within the blueline boundary as on-site. The habitat baseline must be accurate prior to determination and must reflect the entire red line boundary only. Either the redline boundary needs to be adjusted or the metric altered to account for the area in the blue line boundary as off-site. We are content with the baseline habitat classifications. As there are no potential measures on site, we are satisfied that the habitats have been correctly identified as low strategic significance for both pre and post-development. We consider that the proposed habitat creation/enhancement and proposed uplift of 12.20% habitat and 385.29% hedgerow BNG is achievable and realistic. However, the % net gain may be subject to change once the issues with the redline boundary have been resolved.
A statement whether activities have	Yes	None reported or visible on aerial

Information Needed	Provided	Comments
been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value (‘degradation’)		imagery dated 2020-2025 (Google Earth Pro, accessed 28 April 2026 date)
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).	No	The habitat plan set out in the EclA does not match the redline boundary in the site plan. The habitat plan has incorporated some of the land set out in the blue line boundary on the site plan as onsite. Either the redline boundary needs to be adjusted or the metric altered to account for the area in the blue line boundary as off-site.

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.”

Ecological Enhancements

Paragraph 187(d) of the NPPF 2024 states: “*Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.*” The updated NPPF encourages habitat features. These are in addition to the requirements of mandatory 10% biodiversity net gain.

Suggested biodiversity enhancements include the provision of durable bird/bat boxes (for house sparrows, starlings, swifts or as appropriate to the development and preferably integrated into new structures), native tree/shrub planting, sowing of an appropriate

wildflower mix, the creation of artificial refugia for reptiles/amphibians, the creation of 'hedgehog highways' (13×13cm gaps in close board fencing) and/or creation of bug hotels/bee bricks for invertebrates. Where placed on buildings, bat and bird boxes should be clearly visible on elevations plans.

The proposed development provides opportunities to incorporate features into the design which are beneficial to wildlife. We advise that measures to enhance biodiversity are secured as a condition of planning permission, if granted - we will provide suggested wording once the requested additional information has been submitted.

Lighting

Lighting in the vicinity of a bat roost or along commuting / foraging routes could constitute an offence both to a population and to individuals. Artificial lighting has been shown to be particularly harmful to bats along river corridors, near woodland edges and near hedgerows⁶. Local authorities have a duty to ensure impacts upon legally protected species are avoided and impacts upon bats are a material consideration in any planning permission under the Natural Environment and Rural Communities (NERC) Act 2006 and through the NPPF 2024.

Bat walkover surveys (Transect surveys and Automated/static bat detector surveys) were undertaken in Spring, Summer and Autumn 2025. Bats were recorded (predominantly common pipistrelle, along with other pipistrelle species, Brown long eared, Myotis species, noctule, serotine and Leisler's) commuting across the site.

Therefore, to mitigate against potential adverse effects on biodiversity, the Bat Conservation Trust/Institute of Lighting Professional's '*Guidance Note 8 Bats and Artificial Lighting at Night*' (or subsequent updates) should be consulted in the lighting design of the development.

We advise that the incorporation of sensitive lighting design for biodiversity is submitted to the local planning authority and secured via an attached condition with any planning permission - we will provide suggested wording once the requested additional information has been submitted.

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

Hannah Simmons
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Preliminary Ecological Appraisal Report (PEAR). RammSanderson Ecology Ltd. 30 September 2025
- Ecological Impact Assessment (EclA). RammSanderson Ecology Ltd. 6 November 2025
- Illustrative Landscape Strategy. Tyler Grange. September 2025
- Statutory Biodiversity Metric. 5 November 2025

⁶ Bats and Artificial Lighting guidance. Available [here](#).