



## ECOLOGICAL ADVICE SERVICE

**TO:** Adeoye Lawal  
**FROM:** Hannah Simmons  
**DATE:** 07 September 2026  
**SUBJECT:** 20260186 Green Farm, Shorne

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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 – 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 below.

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 Reported for Area Habitats | Net Gain Proposed: | On-site 'significant' Net Gains Proposed |
|------------------------------|------------------------------------------------|--------------------|------------------------------------------|
| 10%                          | 13.76%                                         | All on-site        | Yes                                      |

Using the national and local guidance regarding significance, we consider that the on-site biodiversity net gain (excluding private gardens) should be treated as significant and so requires securing for 30-years.

We note that **at the deemed condition stage, the metric will need to be updated** to reflect the publication of the Local Nature Recovery Strategy (LNRS) which will alter the

post-development strategic significance scores of some of the habitats. See Table 2 for details.

We advise that the following conditions are included, see below for suggested condition wording:

- [Precautionary Measures](#)
- [Habitat Management and Monitoring Plan](#)
- [Monitoring Reports](#)
- [Biodiversity Enhancement Plan](#)
- [Lighting](#)

### **Outdated Ecology**

An updated walkover was undertaken in July 2026 and found that the site was in similar condition to when the Preliminary Ecological Appraisal (PEA) was undertaken in August 2024. Therefore, we are satisfied that the results of the original PEA are still valid and can be used to inform this application.

### **Great Crested Newts**

The submitted ecological report has outlined that the proposed development has the potential to have detrimental effects on great crested newts (GCN). The application site lies within 250 metres of at least two ponds/waterbodies but upon the walkover in July 2026, it was confirmed that these ponds are now either extant or considered to offer poor suitability to GCN. Also, the site is within a Green Risk Zone within the GCN Risk Zones for Kent<sup>1</sup> but is 725m from an Amber Risk zone.

We are satisfied that as the ponds nearby are no longer suitable for GCN, it is unlikely that they are onsite and therefore, no further surveys or mitigation is required. If a great crested newt is found during site clearance, we advise that all works cease immediately and that a qualified ecologist is consulted.

### **Other Protected Species**

Precautionary measures have been set out in the PEA for Breeding birds, Reptiles and Hedgehogs. We are satisfied that these are suitable for these species. We advise that these measures are secured via condition.

#### Precautionary Measures – Suggested Condition Wording

*From commencement of works (including site/vegetation clearance), and for the duration of construction, all mitigation for Breeding birds, Reptiles and Hedgehogs shall be carried out in accordance with the details contained in sections 5 of the Preliminary Ecological Appraisal (Calumma Ecological Services, 10 July 2026, report reference 2425/23/2).*

### **Biodiversity Net Gain**

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications<sup>2</sup> for development (unless exempt<sup>3,4</sup>), must deliver at

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<sup>1</sup><https://naturalengland-defra.opendata.arcgis.com/datasets/gcn-risk-zoneskent/explore?location=51.098205%2C0.660587%2C16.33>

<sup>2</sup> All planning applications for major development (unless exempt) submitted on or after 12<sup>th</sup> February 2024 in England, and all minor applications (unless exempt), submitted on or after the 2<sup>nd</sup> April 2024.

<sup>3</sup> Biodiversity net gain: exempt developments - GOV.UK ([www.gov.uk](http://www.gov.uk))

<sup>4</sup> The Biodiversity Gain Requirements (Exemptions) Regulations 2024 ([legislation.gov.uk](http://legislation.gov.uk))

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 information<sup>5</sup>, 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, expected information standards in line with planning practice guidance and any applicable national or local policies.*

| 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), <a href="#">either on the date of application or earlier proposed date (as appropriate)</a> .                                                                                                                                                     | Yes      | A site visit was carried out by a suitably qualified ecologist 14 January 2026. 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      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <a href="#">The completed metric calculation tool</a> 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      | <p>The site is 3663 square metres (0.37 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.</p> <p><b><u>Baseline Habitats</u></b></p> <p>We are content with the baseline habitat classifications. We are satisfied that upon review of the information submitted regarding T2 and further investigation of historical aerial imagery, that it is not a tree and therefore does not need to be included in the metric. We are satisfied that it has</p> |

<sup>5</sup> 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.

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |     | <p>been recorded in the tall forbs measurement and does not need to be added to the metric.</p> <p>We highlight that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28<sup>th</sup> November 2025. The LNRS changes how strategic significance is considered and any BNG assessments produced after the LNRS was published can no longer use <i>Location ecologically desirable but not in local strategy</i>. All baseline information must be set to <i>Area/compensation not in local strategy/ no local strategy</i>.</p> <p>The baseline information has correctly reflected the published LNRS requirements.</p> |
| <p>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 ('<a href="#">degradation</a>'), and where they have:</p> <ul style="list-style-type: none"> <li>• a statement to the effect that these activities have been carried out;</li> <li>• the date immediately before these activities were carried out;</li> <li>• the pre-development biodiversity value of the onsite habitat on this date;</li> <li>• the completed metric calculation tool showing the calculations, and</li> <li>• any available supporting evidence of this.</li> </ul> | Yes | <p>None reported or visible on aerial imagery dated 2018-2026 (Google Earth Pro, accessed 23 June 2026 date)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p>A description of any <a href="#">irreplaceable habitat</a> (as set out in <a href="#">column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024</a>) on the land to which the application relates, that exists on the date of application, (or an earlier date).</p>                                                                                                                                                                                                                                                                                                                                           | -   | <p>None reported.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes | <p>The habitat maps match the redline boundary.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| (or earlier proposed date), including any irreplaceable habitat (if applicable). |  |  |
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## Post-development Habitats

### Habitat Creation and Enhancement Tabs

We consider that the proposed habitat creation/enhancement and proposed uplift of 13.76% BNG is achievable and realistic. However, changes to the strategic significance of Other Neutral Grassland will be required as, after the LNRS was published, the option *Location ecologically desirable but not in local strategy* can no longer be used - see LNRS section below. Altering this may affect the net gain.

We acknowledge that the proposed hedgerows are to be included within the vegetated garden and therefore will not need to be added in separately.

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.

### LNRS

We highlight that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28<sup>th</sup> November 2025. The LNRS changes how strategic significance is considered and any BNG assessments produced after the LNRS was published can no longer use *Location ecologically desirable but not in local strategy*. All post-development information must be set to either *Area/compensation not in local strategy/ no local strategy* or *Formally identified in local strategy* depending on whether the site falls within an ACIB.

As the publication of the LNRS occurred before the planning application was submitted, and as its publication alters or could alter the post-development strategic significance score, the strategic significance scores in the biodiversity metric calculation tool for the post-development habitats will need to be reviewed in advance of the deemed condition discharge<sup>6</sup> to ensure they reflect the published LNRS.

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](#).

The site lies within an ACIB with no potential measures which currently match the proposed habitat creation/enhancement action on-site. Changes to the strategic significance scores for the habitats currently proposed on-site are likely to make a significance different to the achievable BNG outcomes for the site. Justification for how the habitat contributes to the Potential Measure must be included as part of the deemed condition discharge if high strategic significance is selected for the habitat type.

<sup>6</sup> [LNRS and SS Multiplier Transition Guidance 2.pdf](#); [LNRS & Strategic Significance Multiplier Transition | Local Government Association](#)

### On-site Significant 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.

We consider the creation Other Neutral Grassland to constitute significant<sup>7</sup> on-site gains. Government guidance states: *"The maintenance of these significant enhancements must be secured with a [legal agreement](#) (planning obligation or conservation covenant) or planning condition for 30 years in the same way as off-site gains. LPAs will consider the most appropriate mechanism and this will need to be agreed at the planning permission stage."*<sup>8</sup>

It is our view that these significant on-site gains should be subject to a S106 agreement or conservation covenant to secure a monitoring fee and ensure enforceability over a 30-year period. It is our view that monitoring fees should be secured for these significant on-site gains as these gains will need to be subject to monitoring reports across 30 years, which will need to be reviewed (and acted upon as necessary) by the LPA at their own cost. We provided details of suggested monitoring fees in our March 2025 advice note 'KCC Ecological Advice Service suggested BNG Monitoring Fees' which has been distributed to all LPAs in Kent.

Additionally, we recommend conditions for a Habitat Management and Monitoring (HMMP) to secure the significant on-site gains. The HMMP will need to align with the approved biodiversity gain plan and detailed landscaping plans. We also recommend that the conditions secure the retention of trees on site. Although the retention of existing habitat cannot count as on-site significant habitat, the relevant retained habitats are recommended to be secured, as well as the relevant created and enhanced habitats, as without the retained habitats, the 10% biodiversity net gain would not be achieved. Furthermore, there are national and local policies in place to conserve biodiversity.

### HMMP – Suggested Condition Wording

*The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan (submitted as part of the deemed condition discharge application), and based on the most up-to-date and/or relevant ecology surveys as determined by a suitably qualified ecologist, has been submitted to, and approved in writing by, the local planning authority. The Plan shall include:*

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<sup>7</sup> We have recently drafted an advice note titled '[Defining significant onsite habitat for Biodiversity Net Gain in Kent and Medway](#)' (March 2025) which outlines our definition of 'significant'. However, this document is awaiting a revision whereby reference to retained habitats counting as on-site significant habitats will be removed.

<sup>8</sup> [Make on-site biodiversity gains as a developer - GOV.UK](#)

- a) *a non-technical summary;*
- b) *the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- c) *the planned habitat retention, creation and enhancement works (including detailed landscaping plan(s) and planting schedule(s)) to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- d) *the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- e) *the monitoring methodology and frequency in respect of the retained, created or enhanced habitat to be submitted to the local planning authority;*
- f) *details of the decommissioning process to be followed, and measures to be taken, to mitigate impacts to protected and priority species and habitats, including reference to an up-to-date ecological impact assessment carried out in line with current professional guidelines.*

*The retained, created and/or enhanced habitat specified in the approved HMMP shall be implemented, managed, maintained and monitored in accordance with the approved HMMP. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.*

#### Monitoring Reports – Suggested Condition Wording

*Monitoring reports demonstrating that the development is achieving the targeted biodiversity net gain in the approved biodiversity gain plan shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP. Remedial measures, if required, shall be specified within an updated HMMP submitted for approval in writing by the local planning authority at the same time as the submission of each monitoring report. The remedial management measures shall be implemented as approved.*

#### Submission of Biodiversity Gain Plan

The applicant should submit a biodiversity gain plan form<sup>9</sup> along with supporting information (e.g., legal agreement and habitat management and monitoring plan) once planning permission has been granted to demonstrate in more detail how the proposed biodiversity net gain will be delivered. The biodiversity gain plan must include the following information:

- Information about steps taken or to be taken to minimise the adverse effects of the development on biodiversity;
- The pre-development biodiversity value of the on-site habitat;
- The post-development biodiversity value of the on-site habitat;
- Any registered off-site biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development;
- Any biodiversity credits purchased for the development; and
- Any other matters that the Secretary of State may be regulations specify.

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<sup>9</sup> [Biodiversity gain plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/biodiversity-gain-plan)

We advise the local planning authority that there may be conditions attached to the decision notice should planning permission be granted that are linked to the biodiversity gain plan. Wording should be included in such conditions to ensure that it is clear that any documents/plans are produced in accordance with the 'approved biodiversity gain plan'. Relevant conditions where this is likely to be appropriate include soft and hard landscaping conditions, and any other ecology/biodiversity conditions. Other relevant conditions may include drainage conditions.

### **Ecological Enhancements**

The proposed development provides opportunities to incorporate features into the design which are beneficial to wildlife, such as native species planting and the installation of integrated bat/bird nest boxes. We advise that measures to enhance biodiversity are secured as a condition of planning permission, if granted. This is in accordance with Policy N2 (NPPF 2026) which states to contribute positively to the natural environment, and support nature's recovery, development proposals should: *Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective*

Two bat boxes, two sparrow terrace boxes and one blue tit box have been proposed on the converted barn. Whilst we are satisfied with the locations of these enhancements, confirmation of the box model (Integrated boxes are preferable but suitable woodcrete/durable boxes would also be acceptable) are required to ensure that the enhancements are durable and long lasting. We advise that these can be secured via condition.

### **Biodiversity Enhancement Plan – Suggested Condition Wording**

*Prior to any works above slab level, a Biodiversity Enhancement Plan (BEP) shall be submitted to and approved in writing by the local planning authority. The Plan shall include full details of the biodiversity enhancements to be implemented on-site. The Plan shall be based on the details contained in sections \*insert number(s)\* of the \*insert consultancy/title/date/reference number\* report and shall include:*

- Provision of two bat boxes, two sparrow terrace boxes and one blue tit box, with the exact locations, make and model and height from ground level shown on scaled plans suitable for construction. In the case of building mounted boxes, scaled elevation plans shall be provided. Boxes for breeding birds shall be targeted at S41 priority species and/or red/amber listed species as listed within the latest British Trust for Ornithology Birds of Conservation Concern report. Boxes shall be building integrated and/or constructed of woodcrete to ensure durability. The numbers and types of bat and bird boxes shall be chosen with reference to site ecological survey data, the published Kent Local Nature Recovery Strategy and BS 42021:2022 'British Standard for integral nest boxes';*
- The provision of bee bricks and/or the provision of log piles/artificial refugia for reptiles and amphibians. The exact locations, make and model, height from ground level, size and construction materials shall be shown on scaled plans suitable for construction.*

*The Plan shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.*

### **Lighting**

Lighting in the vicinity of a bat roost or along commuting/foraging routes could result in disturbance resulting in roost abandonment, which is an offence under Regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended). Artificial lighting has been shown to be particularly harmful to bats along river corridors, near woodland edges and near hedgerows. 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 National Planning Policy Framework (NPPF) 2026<sup>10</sup>.

Therefore, to mitigate against potential adverse effects on biodiversity, the Bat Conservation Trust/Institute of Lighting Professionals ‘*Guidance Note 08/23 Bats and Artificial Lighting at Night*’ 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.

### **Lighting – Suggested Condition Wording**

*Prior to occupation, a lighting design plan for biodiversity shall be submitted to, and approved in writing by, the local planning authority. The plan shall show the type and locations of external lighting, as well as the expected light spill in lux levels, to demonstrate that areas to be lit shall not adversely impact biodiversity. All external lighting shall be installed in accordance with the specifications and locations set out in the approved plan and shall be maintained thereafter.*

### **Hannah Simmons** **Biodiversity Officer**

This response was submitted following consideration of the following documents:

- Preliminary Ecological Appraisal. Calumma Ecological Services. 10 July 2026
- Biodiversity Gain Statement and Statutory Metric. Essential Ecology. 9 February 2026
- Proposed Site Block Plan Revision A. JJB Chartered Architects Ltd. 12 February 2026
- Letter to Planning Officer Addressing Ecology Queries. Submitted 15 July 2026

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<sup>10</sup> NPPF 2026 2.e. “Limit any adverse impact from artificial light on local amenity, intrinsically dark landscapes (those areas entirely, or largely, uninterrupted by artificial light) and nature...”