



## ECOLOGICAL ADVICE SERVICE

**TO:** *Amanda Cue*

**FROM:** *Helen Forster*

**DATE:** *20 October 2025*

**SUBJECT:** *Blackthorn Farm Meopham 20250802*

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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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We have reviewed the information submitted in support of this application and advise that insufficient ecological information has been provided to determine the application.

An Ecological Impact Assessment (EclA) must 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 (including soft landscaping as well as habitat features such as hedgehog highways, bat boxes and bird boxes), and;
- Provision of sufficient information to determine whether the project accords with relevant nature conservation policies and legislation.

An outline EclA has been submitted and it does not address all the above points instead it refers to survey reports which have or will be submitted as part of the application. We advise that only document must be submitted as part of the application which includes the above listed information.

Table 5.1 of the Interim Ecological impact Assessment details that the following surveys are required to be carried out:

- Botanical Surveys to inform BNG baseline assessment\*
- Building Assessment and Ground Level Tree Assessment for bats\*
- Bat Activity Surveys
- Recommended bat emergence surveys\*
- GCN HSI/eDNA surveys\*
- Dormouse Survey
- Badger Survey\*
- Reptile Surveys+
- Breeding Bird Surveys+

*\*surveys appear to have been carried out but results not provided*

*+surveys reports for these species groups have been provided.*

A breeding bird survey and herptile survey report has been submitted but we highlight that the survey results have not been used to update the assessment of impacts of the development on those species groups.

We note that only four breeding bird surveys were carried out and only covered May and June. The breeding bird guidelines (Bird Survey & Assessment Steering Group, 'Bird Survey Guidelines', 2024). The guidelines state that six visits (either fixed point for small sites or transect for large sites) covering the period late March- early July. Surveys need to be carried out in good visibility, avoiding heavy rain, strong winds or fog. Surveys should start between half an hour before sunrise and half an hour after sunrise, with at least one evening survey. The locations of species recorded should be shown on a clear plan as well as records of the activity of the birds observed (e.g. feeding, resting, roosting). Incidental observations should also be recorded, with particular consideration for Schedule 1 WCA 1981 (as amended) and Section 41 NERC 2006 species. We advise that further information must be provided detailing why best practice was not followed during the breeding bird surveys and plans must be provided confirming the locations of the species recorded.

It is not clear if further GCN surveys or are required as detailed in table 5.1 or, as access to the off site ponds was not granted, if the applicant will use the District Level Licencing scheme to avoid an impact on Great Crested Newts.

The report details that bat emergence surveys have been carried out but the results of the surveys have not been included within the EclA or the results of the surveys used to assess the impact of the proposed development.

The report suggests that badger and botanical surveys have been carried out but the results of the surveys have not been used to assess the impact of the proposed development.

It appears that dormouse surveys are on going but the results of the surveys have not been submitted or the survey results used to assess the impact of the proposed development.

We advise that an updated Ecological Impact Assessment must be submitted addressing all the above points. We advise that only 1 document must be submitted including all the information required of an EclA.

### **Biodiversity Net Gain**

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications<sup>1</sup> for development (unless exempt<sup>2,3</sup>), 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.

A BNG report and metric has been submitted however the on site baseline and on site post development plans referred to within the BNG report have not been submitted. They must be submitted to enable GBC to be satisfied that the submitted metric is correct.

The metric details that areas of lowland meadow will be lost to facilitate the development and no information has been provided detailing how the habitats will be compensated for. Lowland Meadow is a high distinctiveness habitat and therefore lowland meadow will have to be created or enhanced (on or off site) to enable the development to demonstrate that the trading rules will be met.

We advise that details of how lowland meadow will/can be compensated for must be submitted as part of this application. . Whilst a full metric demonstrating a 10% net gain is not required for validation or determination of a planning 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."*

### **Other Matters**

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024, biodiversity should be maintained and enhanced through the planning system.

We advise that details of the minimum number of enhancement features to be incorporated in to the buildings and open space must be provided as part of this application. We accept that as it is outline a detailed plan can not be submitted at this point.

### **Outline Management Plan**

As part of the BNG and the species mitigation will be reliant on the management of the open space we recommend that an outline management plan is submitted as part of this application.

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<sup>1</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>2</sup> Biodiversity net gain: exempt developments - GOV.UK ([www.gov.uk](http://www.gov.uk))

<sup>3</sup> The Biodiversity Gain Requirements (Exemptions) Regulations 2024 ([legislation.gov.uk](http://legislation.gov.uk))

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

**Helen Forster MCIEEM**  
**Biodiversity Officer**

This response was submitted following consideration of the following documents:

- Outline Ecological Impact Assessment; EPR; September 2025
- Herptile Survey Report; EPR; September 2025
- Biodiversity Net Gain Validation Statement; EPR; September 2025
- Breeding Bird Survey Report; EPR September 2025