



## ECOLOGICAL ADVICE SERVICE

**TO:** *Katherine Parkin*

**FROM:** *Jonathan Lynch ACIEEM*

**DATE:** *06 November 2025*

**SUBJECT:** *20250643 / New Green Farm Lower Road Shorne Gravesend Kent*

---

*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 – NO FURTHER INFORMATION REQUESTED**

We have reviewed the ecological information submitted in support of this application and advise that **no further** information is requested from the applicant prior to determination of the planning application.

### **ECOLOGICAL CONSTRAINTS AND MITIGATIONS**

The submitted Preliminary Ecological Appraisal (Greenspace Ecological Solutions, January 2025) provides a good overview of the site. No further ecological surveys are deemed necessary. A precautionary approach is recommended in section 6.4 of the report for badgers, reptiles and nesting birds. Other protected/priority species are reasonably scoped out. A CEMP condition is recommended as follows:

**CEMP:** *No development shall be undertaken (including any site and/or vegetation clearance) until a Construction Environmental Management Plan (CEMP) which contains full details of the measures outlined in section 6.4 of the Preliminary Ecological Appraisal*

*(Greenspace Ecological Solutions, January 2025) has been submitted to and approved in writing by the local planning authority. The CEMP shall be based on up-to-date ecological survey information, as advised by a suitably qualified ecologist and include the following:*

- a) Retained tree and hedgerow protection measures in accordance with BS 5837:2012;*
- b) Specific measures (which may be presented as a series of method statements) to avoid impacts to badgers, reptiles and nesting birds;*
- c) The role and responsibilities of an Ecological Clerk of Works (ECoW) or similarly competent person(s); and*
- d) Copies of any protected species mitigation licences issued by Natural England as required.*

*The approved CEMP shall be adhered to and implemented throughout the construction period in accordance with the approved details.*

*Reason: To protect biodiversity in accordance with the NPPF paragraph 193 and Local Policy CS12, to avoid an offence under the Wildlife and Countryside Act 1981 (as amended) and with consideration for Species of Principal Importance under the Natural Environment and Rural Communities Act 2006.*

## **BIODIVERSITY NET GAIN (BNG)**

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications received in England (with a few exemptions) must deliver at least a 10% biodiversity net gain (BNG) from April 2<sup>nd</sup> 2024. Where required, the Statutory Biodiversity Metric will need to be used to demonstrate a minimum 10% biodiversity net gain. Local policy may request a higher level of net gain. Significant gains will need to be secured for at least 30 years.

Biodiversity net gain is a statutory requirement of this proposed development. References to the biodiversity value of any habitat or habitat enhancement are to its value as calculated in accordance with the biodiversity metric.

The submitted Statutory Biodiversity Metric (Greenspace Ecological Solutions, February 2025) describes the application site as 0.42ha of cereal cropland and modified grassland/ruderal vegetation. These are all low distinctiveness habitats. The proposed development will result in the total loss of onsite habitats. As compensation, the applicant proposes the offsite enhancement of 0.59ha of arable field margins to 'Arable field margins pollen and nectar' (UKHab code c1a6; simply field margins sown with nectar-rich wildflowers). This offsite enhancement will deliver 14.33% biodiversity gains.

Offsite biodiversity gains must be registered and allocated prior to commencement of any development: [Register a biodiversity site and allocate to a development - GOV.UK](https://www.gov.uk/register-a-biodiversity-site-and-allocate-to-a-development)

This must be evidenced when the 'deemed' condition of BNG is discharged, as per Schedule 7A 13(1) of the Town and Country Planning Act 1990. The condition is that **the development may not be begun unless—**

- (a) a biodiversity gain plan has been submitted to the planning authority, and**
- (b) the planning authority has approved the plan.**

The condition cannot be varied or removed. An application must be made to discharge it as any other condition. We recommend it is referred to in decision notices in the form of an informative. The government's published Biodiversity Gain Plan (BGP) template should be used to discharge it: [Biodiversity gain plan - GOV.UK](#). Please note that the submission of the finalised Statutory Biodiversity Metric/BGP is required by law prior to the commencement of any development.

### **SECURING OFFSITE BIODIVERSITY GAINS**

Offsite biodiversity gains must be secured via S106 agreement or conservation covenant. The applicant will otherwise be unable to register the biodiversity gain site. See: [Enter a legal agreement for biodiversity net gain - GOV.UK](#)

A Habitat Management and Monitoring Plan (HMMP) will be required to register the offsite biodiversity gains. This can be secured as part of the legal agreement and should contain:

- (a) a non-technical summary;
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (c) the planned habitat creation and enhancement works 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 created or enhanced habitat to be submitted to the local planning authority.

A monitoring fee should be secured as these biodiversity 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 provide 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.

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

**Jonathan Lynch ACIEEM**  
**Biodiversity Officer**

This response was submitted following consideration of the following documents:

- Existing Block Plan (AC Goatham, October 2025)
- Proposed Block Plan (AC Goatham, October 2025)
- Landscape Strategy (Huskisson Brown, February 2025)
- Preliminary Ecological Appraisal (Greenspace Ecological Solutions, January 2025)
- Biodiversity Gain Plan (Greenspace Ecological Solutions, February 2025)
- Statutory Biodiversity Metric (Greenspace Ecological Solutions, February 2025)