



## ECOLOGICAL ADVICE SERVICE

**TO:** Sally Hodgson  
**FROM:** Helen Forster  
**DATE:** 10 September 2025  
**SUBJECT:** Little Tuesnoad, Bethersden PA/2025/1028

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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 advise that additional information is required prior to determination of the planning application regarding the BNG assessment.

### **Protected/notable species**

When we previously commented we advised that no information had been provided considering the impact the proposed development will have on protected species - In particular the impact on GCN as there is a pond on the site.

A simple GCN assessment has been submitted and detailed that the pond on site has poor suitability for GCN and the GCN risk assessment has detailed that the impact is unlikely. We have considered this information and do accept the conclusions that no additional surveys no a District Level Licence is required.

However as detailed within the submission a precautionary mitigation approach must be implemented during construction and we advise that we are satisfied that this information can be submitted via a condition – we can provide suggested wording once the additional information has been provided.

### **Biodiversity Net Gain**

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications<sup>58</sup> for development (unless exempt<sup>59,60</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. Having reviewed submitted information<sup>61</sup>, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development.

Any application which is required to achieve a 10% BNG must submit the following information as a minimum<sup>1</sup>:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), [either on the date of application or earlier proposed date \(as appropriate\)](#);
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- [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;
- 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 ([‘degradation’](#)), and where they have:
  - a statement to the effect that these activities have been carried out;
  - the date immediately before these activities were carried out;
  - the pre-development biodiversity value of the onsite habitat on this date;
  - the completed metric calculation tool showing the calculations, and
  - any available supporting evidence of this;
- 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); and
- 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).

We highlight that two metrics have been submitted for this application and we highlight that both have different conclusions and both have incorrect baselines.

We advise that we disagree with the submitted baseline in the metric which details that the site contains vegetated garden, bare ground, developed land and a pond. This does not correspond with the habitat plan in figure 2 which states that the site is largely modified

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<sup>1</sup> <https://www.gov.uk/guidance/biodiversity-net-gain#para11>

grassland and a pond. As this application is for a change of use to residential we advise that the plan in in figure 2 is the likely correct baseline.

We advise that an updated BNG assessment and updated metric must be submitted prior to determination.

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:

- Biodiversity Net Gain (BNG) Assessment; Adonis Blue; August 2025