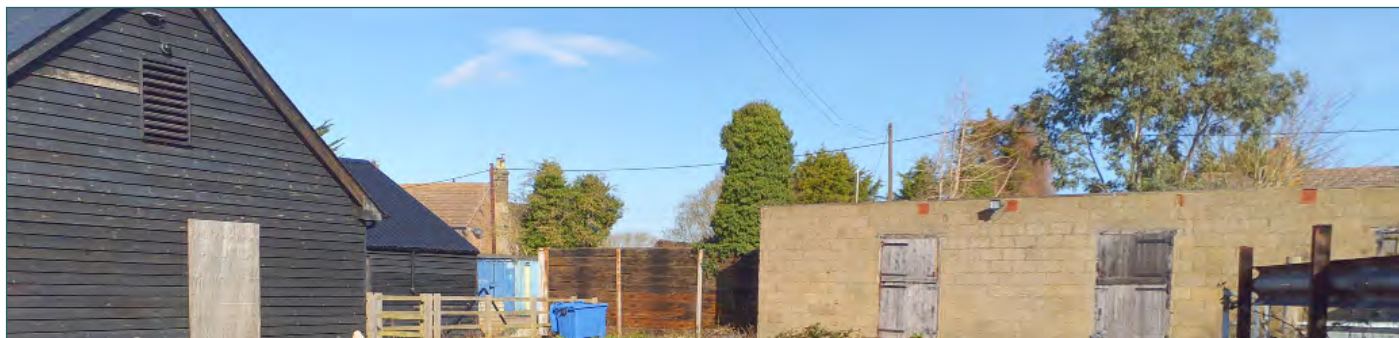




BIODIVERSITY NET GAIN ASSESSMENT: FEASIBILITY STAGE

GILES FARM

HIGHAM, KENT

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CONTENTS

1.	SUMMARY	4
2.	INTRODUCTION	6
3.	SITE LOCATION PLAN	8
4.	SITE LOCATION: LPA / NCA	9
5.	EXISTING SITE PLAN	10
6.	PROPOSED SITE LAYOUT PLAN	11
7.	METHODOLOGY	12
8.	BASELINE ASSESSMENT	14
9.	BASELINE HABITAT PLAN	15
10.	PROPOSED DESIGN	16
11.	POST DEVELOPMENT HABITAT PLAN	17
12.	METRIC RESULTS	18
13.	DESK STUDY	19
14.	RECOMMENDATIONS	20
15.	NEXT STEPS	24
16.	REFERENCES	26
17.	APPENDIX 1: HABITAT DEFINITIONS	27
18.	APPENDIX 2: RECOMMENDATIONS PLAN	28
19.	APPENDIX 3: RELEVANT LEGISLATION	29
20.	APPENDIX 4: BNG GOOD PRACTICE PRINCIPLES AND GUIDELINES	30
21.	APPENDIX 5: OVERVIEW OF BNG IN PLANNING PROCESS	33

1. SUMMARY

RESULTS

- S.1 The biodiversity net gain feasibility assessment shows that current development proposals result in a **-78.38% loss** in the biodiversity value of habitat units. No hedgerow or watercourse units are present or proposed. 0.30 units are required to achieve a 10% net gain.
- S.2 Proposals include the conversion of a former office building into a residential unit, including replacing materials where needed and landscaping.

RECOMMENDATIONS

- S.3 The following measures should be considered to achieve 10% gain:
- Reduce garden sizes and provide areas of other neutral grassland.
 - Planting of trees on-site, outside of vegetated gardens.
 - Planting of trees off-site.
- S.4 A plan of recommendations is provided in Appendix 2. In combination with the planting of 10no. trees off-site, this plan results in a 11.18% gain in biodiversity units.
- S.5 Should net gain not be achievable through on-site or off-site habitat creation and enhancement, the purchase of units from a 3rd party supplier, or statutory credits, can provide compensation to achieve an overall 10% gain.

Next steps

- S.6 Section 15 provides an overview of the next steps of the Biodiversity Net Gain process.

APPENDICES

[Appendix 1](#): Table of habitat definitions and recommendations to maximise condition.

[Appendix 2](#): Recommendations plan

[Appendix 3](#): Overview of relevant legislation, which should be read in conjunction with this report.

[Appendix 4](#): BNG: Good Practice Principles

[Appendix 5](#): Biodiversity Net Gain process for planning

2. INTRODUCTION

- 2.1 This report details a Biodiversity Net Gain Feasibility Assessment undertaken in respect of proposed development at the Old Goods Yard, Lenham, Kent.

Table 1. Site Location

Site address	Giles Farm, Higham, Kent, ME3 7LR
Grid reference (at centre)	TQ 71575 74071
Local Planning Authority	Gravesham Borough Council
County	Kent
National Character Area	North Kent Plains
Biodiversity Opportunity Area	N/A

COMMISSION

- 2.2 Native Ecology was commissioned by Duncan Graham Partnership in May 2024 to undertake a Biodiversity Net Gain Feasibility Assessment of the Site to include baseline calculations and change in biodiversity value.

APPLICATION SITE

- 2.3 The application site, hereafter referred to as “the Site”, comprises predominately of hardstanding and buildings, with small areas of sparsely vegetated land. The Site extends to approximately 0.01ha.
- 2.4 Figure 1, Section 3 provides a Site location Plan, and Figure 2, Section 4 provides a plan of the location in relation to the LPA and National Character Area boundaries.
- 2.5 The Site does not lie within a Biodiversity Opportunity Area, as identified within the Kent Biodiversity Strategy (Kent Nature Partnership, 2020).
- 2.6 Figure 3, Section 5 provides an existing site plan.

PROPOSED WORKS

- 2.7 The development proposals for the Site comprise the conversion of a former office building into a residential unit, including replacing materials where needed and landscaping.
- 2.8 Figure 4, Section 6 provides a plan of the proposals.

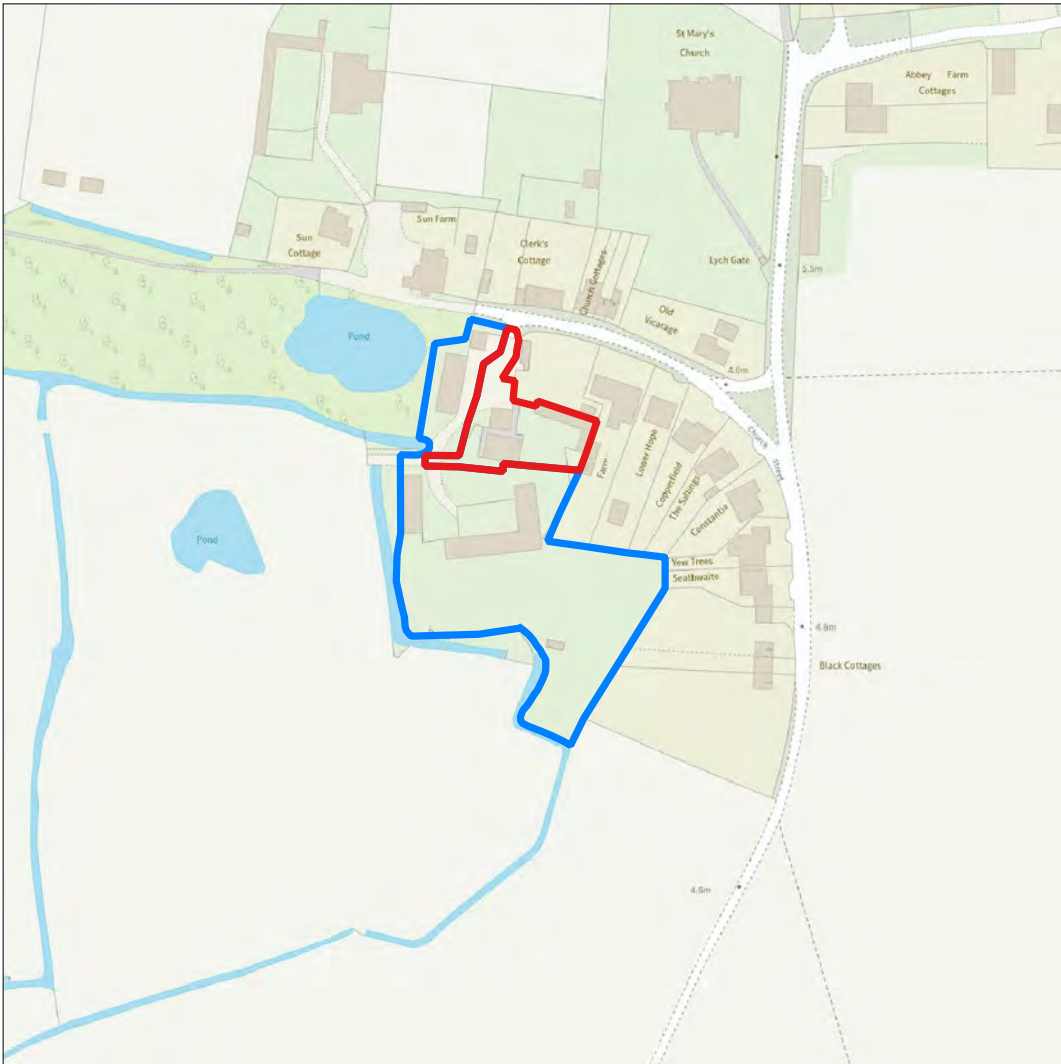
BIODIVERSITY TARGET

- 2.9 Schedule 14 of the Environment Act 2021 makes provision for a biodiversity gain of at least 10% to be a condition of planning permission in England. This is supported by the Gravesham Local Plan (Gravesham Borough Council, 2014).

PURPOSE OF REPORT

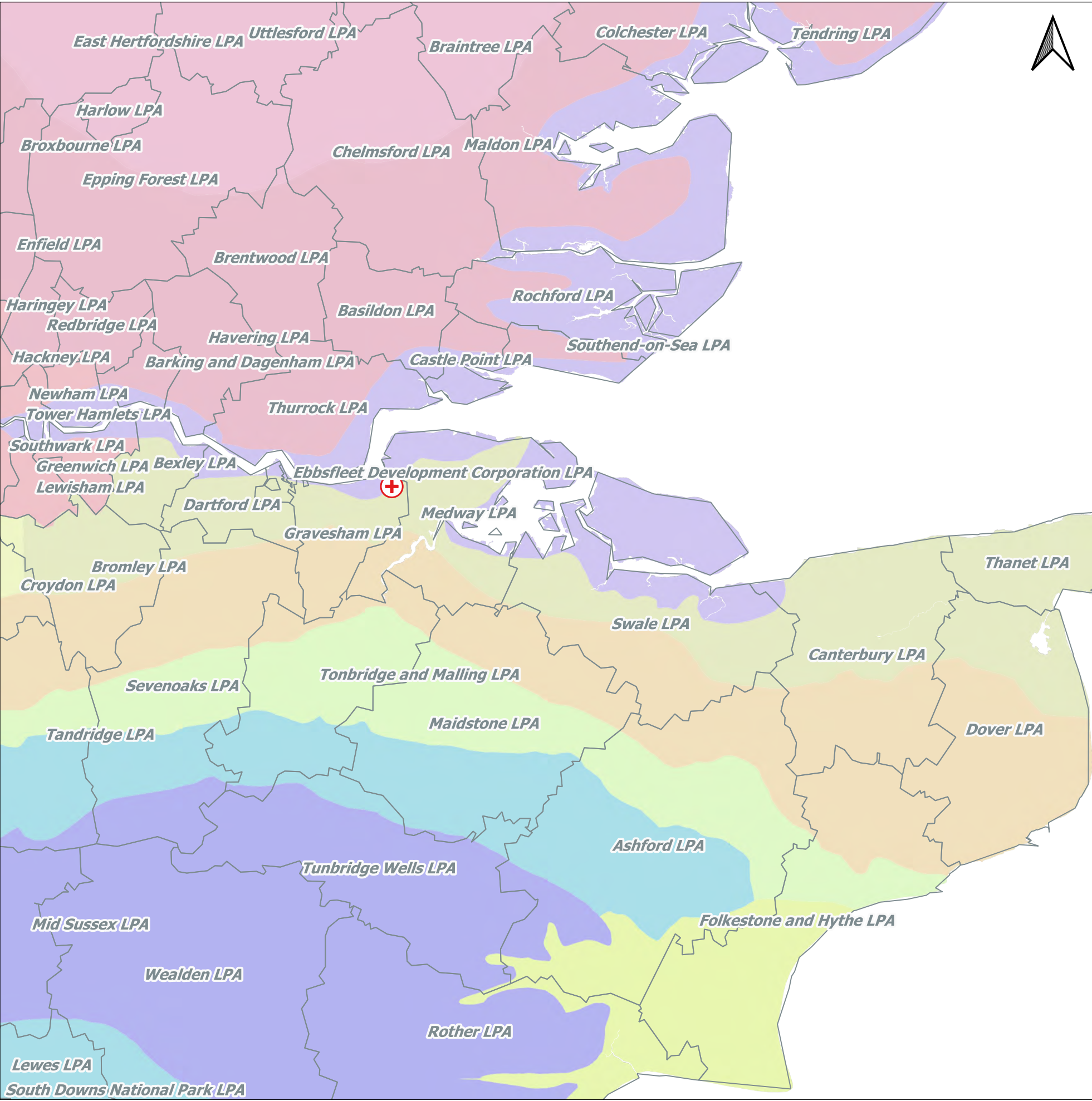
2.10 The objectives of the report are to:

- Detail the baseline habitats present within the Site.
- Undertake a desk study to inform recommendations for habitat enhancement and creation.
- Measure and map the habitats present within the Site.
- Present the baseline biodiversity units.
- Provide an estimate of the post-development units.
- Provide a summary of the overall net gain assessment calculations.
- Provide recommendations to achieve net gain based on appropriate good practice principles.



0 20 40 60 80 100 m

 native ecology PROMOTING BIODIVERSITY INTEGRATION	
Site location plan	
Giles Farm Higham Kent	
Drawing ref:	Figure 1
Revision:	-
Date:	26/03/2024
Scale:	1:20,000 (Main canvas)
Paper size:	A3



0 0.5 1 1.5 2 2.5 km

Legend

-  Site Location
-  Greater Thames Estuary
-  North Downs
-  North Kent Plain
-  Northern Thames Basin



native ecology
PROMOTING BIODIVERSITY INTEGRATION

Figure 2: LPA and NCA Plan

Giles Farm
Church Street, Higham

Revision:	-
Date:	22/06/2024
Scale:	1:400,000 (Main canvas)
Paper size:	A3

Scale 1:1000

North Arrow

Legend

- Proposed Development
- Existing Development
- Public Footpath
- Public Road
- Private Road
- Watercourse
- Boundary

LOCATION PLAN

Glen Farm Church Street, Highgate



native ecology
PROMOTING BIODIVERSITY INTEGRATION

7. METHODOLOGY

HABITAT CONDITION ASSESSMENT

- 7.1 A Preliminary Ecological Appraisal (Native Ecology, 2024, report reference 1512_R01) and Baseline Habitat Condition Assessment (Native Ecology, 2024, report reference 1512_R02) are used to inform the baseline calculations within this report.

DESK STUDY

- 7.2 The following resources were used to provide recommendations for habitat creation within the Site, and to inform the assignment of strategic significance:
- Preliminary Ecological Appraisal report (Native Ecology, 2024)
 - Summary of Interim Strategic Significance Guidance for Biodiversity Net Gain in Kent and Medway (Kent County Council, 2024)
 - The Kent Biodiversity Strategy (Kent Nature Partnership, 2020)
 - Natural England Habitat Network Maps
 - Kent Landscape Information Service (KLIS) habitat opportunities tool
 - British Geological Survey Geology Viewer
 - Magic Map Application

STATUTORY BIODIVERSITY METRIC

- 7.3 The Biodiversity Metric calculation tool provides a way to measure the biodiversity value of a site and subsequent losses and gains as a result of development proposals. It is used to inform and guide development plans and decisions on achieving biodiversity net gain within a project.
- 7.4 The Metric uses habitat type as a proxy for the relative biodiversity value of a site. The on-site habitats are converted into measurable biodiversity units, which then provide the basis of the calculations.

Calculating the baseline biodiversity units

- 7.5 To calculate the change in biodiversity unit value of the Site resulting from the proposed development, the baseline biodiversity value of the Site was first calculated. The output of the Statutory Metric tool gives the existing biodiversity unit value of the Site.

Condition

- 7.6 The calculations within this assessment have been carried out using an assessment of habitat condition undertaken on 04/03/2024. Full details can be found within the Habitat Condition Assessment Report (Native Ecology, 2024, report reference 1512_R02). There were no limitations to this assessment.

Habitat distinctiveness

- 7.7 Each habitat type (based on the UKHab classification) is pre-assigned a 'distinctiveness' score by the Metric.

Strategic significance

- 7.8 Each habitat parcel was assigned a level of strategic significance and given a score based on whether it is located within an area that is locally significant for that habitat type.

Calculating the post-construction biodiversity units and net change

- 7.9 The calculation was then repeated for post-development. Appropriate figures, based on the current proposals, for habitat retention, creation and enhancement were input into the Statutory Metric tool.
- 7.10 The Metric measures predicted changes in biodiversity value and includes additional influences to account for risks associated with habitat creation and enhancement. Three risk factors are incorporated into the Metric tool:
- Difficulty of creating or restoring a habitat.
 - Temporal risk - The time it takes for habitat to reach required condition. The risk can be minimised by reducing the delay between site clearance and habitat creation.
 - Spatial risk - The location of any off-site mitigation. Off-site mitigation outside the LPA/NCA boundary carries a higher risk than mitigation within the same LPA/NCA as the development site.
- 7.11 When all data is input, The Statutory Metric tool provides a summary of the net change in biodiversity unit value for habitats, hedgerows and watercourses.

ASSESSMENT DOCUMENTS

- 7.12 The biodiversity net gain assessment calculations are based on the following post-development layout:
- Site Layout Plan (The Duncan + Graham Partnership, Drawing No.19.035 33 dated Jan 2024)

ASSUMPTIONS

- 7.13 The feasibility calculations are based on the following assumptions:
- The Site Plan (The Duncan + Graham Partnership, 2024) does not contain detailed landscaping information and therefore all habitat outside the built area is assumed to comprise vegetated garden.
 - Habitat creation measures have been assigned target conditions that are considered to be achievable within 30 years and in the context of the development.
 - There will be a 1 year delay between habitat loss and creation.
 - Habitat creation will be managed appropriately and replaced as required.
 - All off-site habitats will be retained and protected during works.
- 7.14 Appendix 1 provides a table of relevant habitat definitions with recommendations for maximising the achievable condition.

8. BASELINE ASSESSMENT

IRREPLACEABLE HABITATS

8.1 No irreplaceable habitats are present within the Site.

OTHER HABITATS

8.2 Table 2 provides a summary of habitats present within the Site and their baseline value. A Baseline habitat plan is provided in Section 9.

Table 2. Summary of baseline habitats present within the Site

	HABITAT	CONDITION	STRATEGIC SIGNIFICANCE	AREA/LENGTH	UNIT VALUE
HABITAT	Ruderal/ephemeral	Good	Low	0.051 ha	0.31
	Tall forbs	Good	Low	0.005 ha	0.03
	Developed land; sealed surface	N/a	Low	0.020 ha	0.00
	Developed land; sealed surface (buildings)	N/a	Low	0.023 ha	0.00
	Total				0.34



Legend

-  Application site boundary
-  Developed land; sealed surface
-  Ruderal/Ephemeral
-  Tall forbs

Note:

Habitats mapped based on UK Habitat Classification following Preliminary Ecological Appraisal site visit undertaken on 04/03/2024.

Habitat Condition

- * poor habitat condition
- ** moderate habitat conition
- *** good habitat condition
- n/a condition assessment not applicable



Figure 5: Phase 1 Biodiversity Net Gain
Baseline Habitat Plan

Giles Farm Higham Kent	
Revision:	-
Date:	04/06/2024
Scale:	1:200
Paper size:	A3

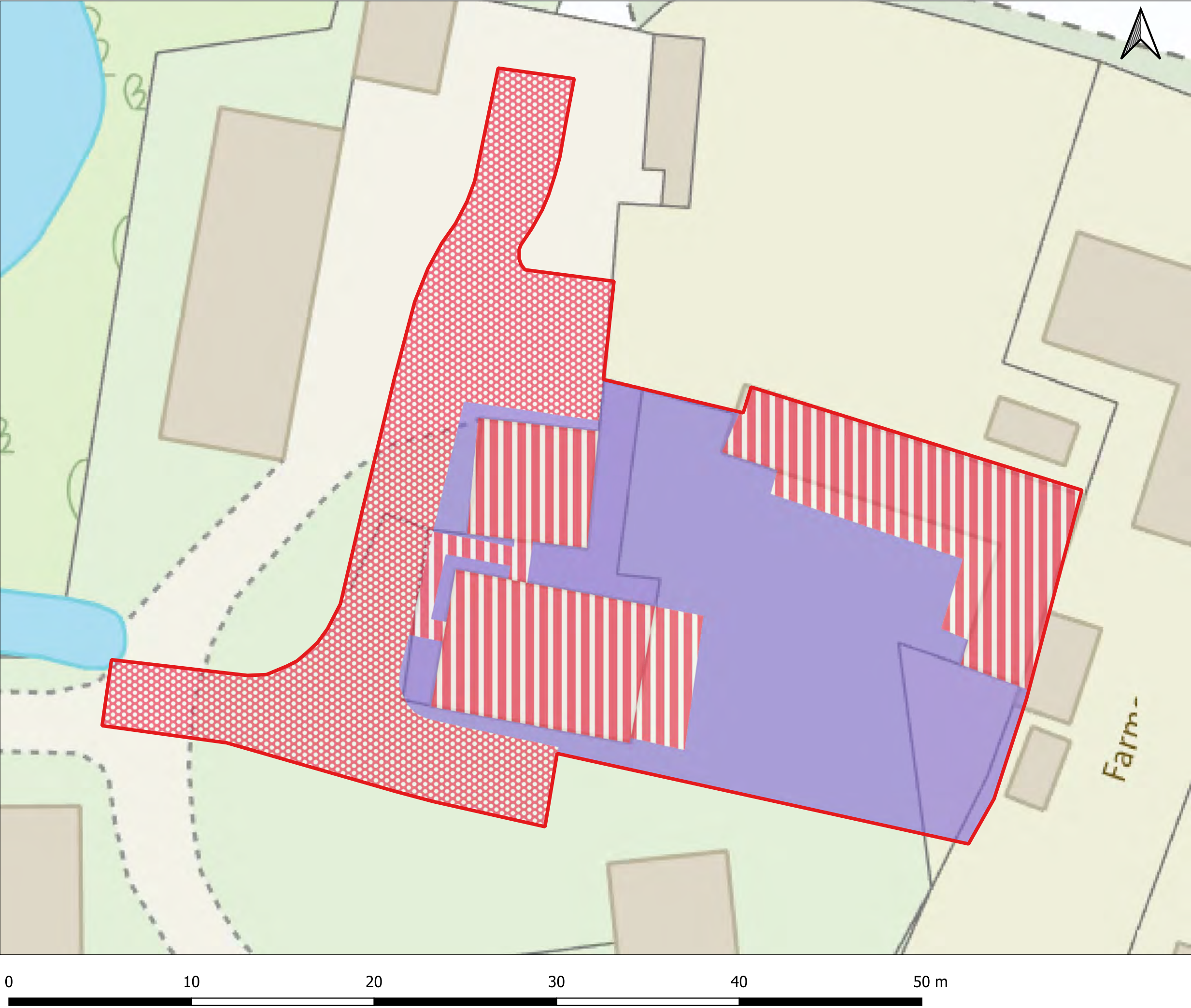
10. PROPOSED DESIGN

PROPOSALS

- 10.1 The Indicative Site Plan (The Duncan + Graham Partnership, 2024) does not contain detailed landscaping information and therefore assumptions have been made about the proposed habitat retention and creation measures:
- Areas of grassland shown on the plan consist of vegetated garden.
 - No trees, hedgerows or shrubs outside of residential development are to be planted.
- 10.2 Retained habitats may be impacted during construction, but must be restored to their original condition within 2 years.
- 10.3 Table 3 provides an overview of the habitat retention, enhancement and creation measures that will be undertaken within the Site and off-site compensation area. A post-development habitat plan is provided in Section 12.
- 10.4 Appendix 1 provides relevant habitat definitions with recommendations for achieving the proposed target condition.

Table 3. Summary of proposed habitat retention, creation and enhancement

	HABITAT	INTERVENTION	DESCRIPTION	CONDITION	STRATEGIC SIGNIFICANCE	AREA / LENGTH	UNITS DELIVERED
Habitat units	Developed land, sealed surface	Retention	The buildings on Site will be retained	N/a	Low	0.023 ha	0.00
	Artificial unvegetated, unsealed surface	Creation	Driveway and parking associated with the new residential building.	N/a	Low	0.031 ha	0.00
	Vegetated garden		The new dwelling will have an associated vegetated garden.	N/a	Low	0.039 ha	0.07
	Developed land, sealed surface		Areas of pathways and patios within the Site.	N/a	Low	0.006 ha	0.00
	Total						0.07



Legend

- Application site boundary
- Artificial unvegetated, unsealed surface
- Developed land; sealed surface
- Vegetated garden

 native ecology PROMOTING BIODIVERSITY INTEGRATION	
Figure 6: Biodiversity Net Gain Post Development Habitat Plan	
Giles Farm Higham Kent	
Revision:	-
Date:	28/05/2024
Scale:	1:200
Paper size:	A3

12. METRIC RESULTS

12.1 Full results of the baseline and post-development biodiversity unit calculations are provided with the accompanying Statutory Biodiversity Metric Calculation Tool (Native Ecology, 2024c), which supports this assessment.

HEADLINE RESULTS

12.2 The biodiversity net gain feasibility assessment shows that current development proposals result in a **-78.38% loss** in the biodiversity value of the area habitats. No hedgerows or watercourses are present or proposed.

12.3 Table 4 shows the overall results of the feasibility assessment.

Table 4. Overall change in biodiversity units

	ON-SITE		NET CHANGE
	BASELINE UNITS	POST DEVELOPMENT UNITS	
Habitat units	0.34	0.07	-78.38%

TRADING SUMMARY RESULTS

12.4 0.3 units are required to achieve a 10% gain.

12.5 No habitats of medium, high or very high distinctiveness are present within the Site. Therefore there are no specific habitat creation requirements to achieve a net gain.

13. DESK STUDY

- 13.1 In accordance with Principle 6 of Biodiversity Net Gain (set out within guidance from CIEEM, CIRIA and IEMA), proposed habitat creation should “use robust and credible evidence that is underpinned by local knowledge of biodiversity priorities when making decisions about appropriate habitats to enhance and create.”
- 13.2 Therefore, to inform recommendations for habitat creation and enhancement (provided in Section 15), a desk study was undertaken to investigate the local and landscape priorities.

Strategic habitat creation

- 13.3 Table 5 provides a summary of habitats that could be created within the Site to provide beneficial outcomes for biodiversity at a landscape or local scale based on the results of the desk study.
- 13.4 The proposed development site lies outside any biodiversity opportunity areas. The National Habitat Network Maps identified one habitat type within the Site which belongs to coastal habitats, which are unsuitable for creation on the Site (Natural England, 2020). The Site is within close distance (approximately 12m) to one designated site, Thames Estuary and Marshes Ramsar. Priority habitats identified within the Kent Biodiversity Strategy (Kent Nature Partnership, 2020) can be created on Site and can be seen in Table 5 below.

Table 5. Summary of potentially beneficial habitat creation measures

HABITAT	SCALE	REASON	SUPPORTING DOCUMENTS
Pond	Local/ Landscape	The Site is surrounded by thirteen waterbodies within 250m of Site. The creation of a wildlife pond, a priority habitat in the Kent Biodiversity Strategy, with native species planting would provide habitat for invertebrates and amphibians and improve foraging opportunities within the Site for bats.	Kent Biodiversity Strategy (Kent Nature Partnership, 2020) and Preliminary Ecological Appraisal (Native Ecology, 2024a)
Hedgerow	Local/ Landscape	The creation of native-species rich hedgerows, a priority habitat within the Kent Biodiversity Strategy, would improve opportunities for nesting birds and increase connectivity through the Site for a variety of wildlife.	Kent Biodiversity Strategy (Kent Nature Partnership, 2020) and Preliminary Ecological Appraisal (Native Ecology, 2024a)
Other neutral grassland	Local	The creation of other neutral grassland within the Site would provide opportunities for pollinating invertebrates, among other species, compensating for the loss of tall forb and ruderal/ephemeral habitats.	Preliminary Ecological Appraisal (Native Ecology, 2024a)
Tree planting	Local	The planting of native trees will benefit foraging bats and birds, among other species.	Preliminary Ecological Appraisal (Native Ecology, 2024a)

14. RECOMMENDATIONS

THE MITIGATION HIERARCHY

- 14.1 A process should be adopted within the design stage of the project to avoid, mitigate and compensate for potential negative ecological impacts, this process is known as the 'mitigation hierarchy'.
- 14.2 Negative ecological impacts should be avoided wherever possible by making amendments to the proposed layout. Where avoidance is not possible, mitigation to reduce the impact should be considered, for example through the creation or enhancement of habitats either on or off-site.
- 14.3 Avoidance and mitigation is most effective when considered as early as possible within a scheme, allowing for measures to be integrated into the design, an appropriate timeline to be developed and for alternatives to be considered.

Avoidance

- 14.4 In the biodiversity net gain process, avoidance should be considered first. Ecologically valuable habitats, including those of high distinctiveness and strategic importance, should be retained wherever possible.

Mitigation

- 14.5 When avoidance measures have been considered, mitigation measures can then be implemented to make up any unit deficits. This will include habitat creation and enhancement measures. On-site measures should be considered first, but off-site mitigation can also be undertaken and included within the net gain metric.
- 14.6 Mitigation measures must address unit deficits within the trading summary rules in addition to any units needed to meet the required overall gain. In this instance, 0.30 units are required to make a 10% gain.

Compensation

- 14.7 Should mitigation measures not be sufficient to achieve net gain, compensation in the form of the purchase of units or statutory credits can be considered. The purchase of units from a 3rd party seller must be considered first. Should no units be available, statutory credits can be purchased. Statutory credits are intended to be used as a last resort option, and this is reflected in the cost. A minimum of 3no. 3rd party sellers must be approached before statutory credits can be used.

RISK REDUCTION

Temporal risks

- 14.8 Enhancement and creation of habitats in advance of construction works can increase the number of biodiversity units generated from the same area. Therefore, early consideration should be given to habitat enhancement and creation measures to ensure that they are brought forward as early in the construction schedule as possible.

Spatial risks

- 14.9** The location of mitigation and compensation has an impact on the number of biodiversity units generated. On-site mitigation is the most valuable. When considering off-site mitigation and compensation, habitat measures undertaken within the LPA/NCA boundary are considerably more valuable than measures undertaken outside these areas. If mitigation / compensation within the LPA/NCA boundary is not possible, the neighbouring LPA/NCAs are more valuable than measures undertaken further afield. Therefore, when selecting sites for off-site mitigation, or when purchasing from a 3rd party seller, the site location should be carefully considered.

RECOMMENDATIONS

14.10 The table below provides recommended avoidance, mitigation and compensation measures. Avoidance measures should be considered first, followed by mitigation. If net gain cannot be achieved through avoidance and mitigation, compensation measures are required.

Table 6. Recommendations based on the mitigation hierarchy & good practice principles

HABITAT TYPE	UNIT DEFICIT	AVOIDANCE	ON-SITE: HABITAT ENHANCEMENT / CREATION	OFF-SITE: HABITAT ENHANCEMENT / CREATION	COMPENSATION (ESTIMATED COST PER UNIT)	
					3RD PARTY SUPPLIER*	STATUTORY CREDITS
Any habitat	0.3	Avoidance measures, which would include the retention of tall forb and ruderal/ ephemeral vegetation are unlikely to be appropriate. These habitats are low distinctiveness and therefore mitigation through the creation of a higher value habitat is appropriate.	The following measures could be considered to improve the post development value of the Site: - Reduction in garden sizes and inclusion of areas of other neutral grassland and/or a pond. - Planting of trees. The alternative scheme, shown in Appendix 2, which includes areas of grassland and 10no. small trees would reduce the loss to -28.13% (0.13 units required to make a net gain)	The planting of trees on off-site land within the ownership boundary could be considered to achieve net gain. In combination with the recommended on-site measures, the planting of 10no. small trees off-site could produce a 10% gain. Alternatively, the creation and or enhancement of any other habitat type on off-site land could be considered. Habitats identified within the desk study, including those of strategic significance and local importance, should be prioritised. Suitable sites should have a low baseline biodiversity unit value and be located within the LPA/NCA boundary.	Varies with habitat type	

14.11 Appendix 2 provides a plan showing the proposed recommendations.

OTHER CONSIDERATIONS

Sustainability

14.12 As part of the net gain process, the wider environmental benefits of the project should be optimised.

14.13 Measures can include:

- Use of locally sourced materials and plants to reduce carbon footprint.
- Use of sustainable and plastic free materials.
- Maximise 'green' area to increase carbon storage potential. For example, consider the use of grass-crete in place of concrete.
- Planting of trees and hedgerow to increase carbon storage potential and reduce heat island effect.

15. NEXT STEPS

- 15.1 Schedule 14 of the Environment Act 2021 makes provision for a biodiversity gain of at least 10% to be a condition of planning permission in England.
- 15.2 Although a pre-commencement condition, the Local Planning Authority (LPA) will likely require information during the decision making process to ensure that the biodiversity obligation can be met and that the condition can be discharged successfully.
- 15.3 Appendix 4 gives a visual summary of BNG within the planning process up to the point of approval.
- 15.4 The next steps in Biodiversity Net Gain process are outlined below.

REVISE LAYOUT

- 15.5 Consider the avoidance and on-site mitigation recommendations outlined in Section 15 and revise the development layout as appropriate. This should be an iterative process involving the design team and the ecologist, and should aim to maximise on-site delivery of biodiversity units.

CONSIDER OFF-SITE MITIGATION

- 15.6 If a unit deficit remains after avoidance and on-site mitigation measures have been maximised, the provision of off-site mitigation can be considered. To identify a suitable site for off-site mitigation, the location and ecological baseline should be considered. Sites with a low ecological baseline (for example developed land, cropland or modified grassland) and located within the LPA/NCA boundary will provide the greatest return.
- 15.7 Any off-site mitigation delivered by the developer is subject to the same legal requirements as units derived from 3rd party suppliers (see below).

DESIGN STAGE REPORT

- 15.8 On completion of layout revisions, a Biodiversity Net Gain Design Stage Report should be produced for submission with the planning application. This should provide details of the proposed habitat creation and enhancement measures that will be undertaken on-site and include a completed Metric Calculation and Kent Biodiversity Gain Statement.
- 15.9 Details of off-site mitigation/compensation, if finalised, can also be included within this report.

APPROACH 3RD PARTY SELLERS

- 15.10 If compensation is required to make net gain, 3rd party suppliers should be approached to determine if appropriate units are available. At least 3no. suppliers must be contacted before Statutory Credits can be considered.

SECURE OFF-SITE UNITS

- 15.11 To secure off-site units, a legal agreement will be required (S106 or Conservation Covenant), which will last at least 30 years from completion of the habitat measures.
- 15.12 Responsibility for habitat enhancement, creation and management will vary depending on the type of legal agreement. In the case of 3rd party units, responsibility will fall on the landowner or Responsible Body. However, when the developer is making gains on their own off-site land, they must take on this responsibility.
- 15.13 In addition, the off-site land must be registered on the biodiversity gain site register.

BIODIVERSITY GAIN PLAN

- 15.14 On receipt of planning permission, a Biodiversity Gain Plan must be completed and approved by the LPA before works can commence. This must be considered when planning a timetable of works. The biodiversity gain plan can only be submitted after planning permission is granted, and should be approved by the LPA within 8 weeks.
- 15.15 The biodiversity gain plan will detail the measures that will be undertaken to achieve a net gain. Application of the mitigation hierarchy must be evidenced within the biodiversity gain plan.

HABITAT MANAGEMENT AND MONITORING PLAN

- 15.16 The gain plan must be supported by a Habitat Management and Monitoring Plan (HMMP) if off-site mitigation or significant gains will be delivered.
- 15.17 The HMMP is a detailed plan that outlines how the land will be managed over at least 30 years to:
- Create and enhance habitats for biodiversity net gain (BNG)
 - Manage and monitor the BNG
- 15.18 Natural England have produced a template (Natural England, 2023) to facilitate the completion of this document, with accompanying guidance.

PURCHASE OF STATUTORY CREDITS

- 15.19 On acceptance of the Biodiversity Gain Plan, any required statutory credits must be purchased.

16. REFERENCES

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17. APPENDIX 1: HABITAT DEFINITIONS

Table 7. Habitat creation definitions and recommendations (continued overleaf)

Habitat Type	Definition	Recommendations
Small urban tree	The diameter of the tree at breast height (DBH) will reach 7.5-30cm in 30 years after planting.	To maximise the condition and biodiversity benefit of the planted trees it is recommended that native species are chosen for planting, and that they are planted in a location where they oversail vegetation.
Other neutral grassland	Grassland containing 9-15 species, per m2 including less than 30% perennial rye grass.	Areas of wildflower and wetland meadow should be sown with appropriate seed mixes, for example Emorsgate General Purpose Meadow Mixture EM1. Seeding with a mixture that includes wild flowers will provide opportunities for pollinating insects. To maximise condition and biodiversity value it is recommended that the grassland is managed with a mowing regime appropriate for meadow. In some instances, soil nutrient stripping may be required to achieve higher conditions.
Traditional orchard	Open grown fruit (or nut) trees set in herbaceous vegetation and managed at a low intensity (without the use of chemicals, infrequent mowing and a low density of trees).	To maximise condition and biodiversity value it is recommended that the orchard is under-seeded with a meadow grassland mix such as Emorsgate EM1-10, which is managed with a mowing regime appropriate for meadow.
Pond (priority or non-priority)	A standing water body that is <2ha.	To maximise condition the pond should be constructed so that it holds water year round. A variety of native submerged, floating and marginal species will be encourage to establish through planting and natural colonisation. Any invasive species should be regularly removed.

18. APPENDIX 2: RECOMMENDATIONS PLAN



Legend

-  Application site boundary
-  Artificial unvegetated, unsealed surface
-  Developed land; sealed surface
-  Other neutral grassland
-  Vegetated garden
-  Small tree

Recommendations result in a 28.13% loss in biodiversity units. An additional 0.12 units are required to make a 10% net gain.

In combination with the planting 10no. small trees off-site, recommendations result in a 11.18% gain in biodiversity units.



Figure 7: Biodiversity Net Gain Recommendations Habitat Plan

Giles Farm
Higham
Kent

Revision:	-
Date:	28/05/2024
Scale:	1:200
Paper size:	A3

19. APPENDIX 3: RELEVANT LEGISLATION

BIODIVERSITY NET GAIN

19.1 Schedule 14 of the Environment Act 2021 makes provision for biodiversity gain to be a condition of planning permission in England. The Act amends the Town and Country Planning Act 1990 so that all planning permissions (except a small number of exemptions) will be subject to a pre-commencement planning condition requiring a Biodiversity Gain Plan to be approved by the Local Planning Authority (LPA). The biodiversity gain plan must demonstrate a net gain of at least 10% in the biodiversity value of the development site.

19.2 The Environment Act 2021 sets out the following key components of mandatory biodiversity gain:

- Minimum 10% gain required calculated using the Biodiversity Metric
- Delivered on-site, off-site or via a new statutory biodiversity credits scheme
- On-site and off-site habitat secured for at least 30 years via planning obligations or conservation covenants
- National register for net gain delivery sites

20. APPENDIX 4: BNG GOOD PRACTICE PRINCIPLES AND GUIDELINES

20.1 This assessment was undertaken in accordance with the following good practice guidelines:

- BS 8683 Process for designing and implementing biodiversity net gain
- CIRIA (2019). Biodiversity net gain. Good practice principles for development: A practical guide.
- CIEEM, CIRIA, IEMA (2016). Biodiversity net gain: Good practice principles for development.
- CIEEM (2021). Biodiversity Net Gain Report and Audit Templates Chartered Institute of Ecology and Environmental Management, Winchester, UK.
- Defra (2024). The Statutory Biodiversity Metric - Draft User Guide

OVERARCHING PRINCIPLES

20.2 Ten principles are set out within guidance from CIEEM, CIRIA and IEMA for achieving biodiversity net gain. These principles (outlined below) have been used as a guide for this assessment and underpin the recommendations detailed in Section 9.

Principle 1: Apply the Mitigation Hierarchy

When using the biodiversity metric the principles and approach of the mitigation hierarchy must be employed. This includes avoiding impacts to ecological features where at all possible. If negative impacts cannot be avoided, mitigation and compensation measures should be undertaken to reduce the effects on ecological features.

Due to the method in which habitat creation and enhancement risks are accounted for within the metric, gains are more easily achieved where impacts to habitats are avoided.

Principle 2: Avoid losing biodiversity that cannot be offset elsewhere

Avoid impacts to irreplaceable habitats. A BNG Assessment cannot be carried out where these habitats are impacted as a result of proposals.

Principle 3: Be inclusive and equitable

Engage stakeholders early and achieve net gain in partnership where possible.

Principle 4: Address risks

Account for any risks and add contingency when calculating losses and gains.

Principle 5: Make a measurable Net Gain contribution

Contribute towards local nature conservation priorities.

Principle 6: Achieve the best outcomes for biodiversity

Use robust and credible evidence that is underpinned by local knowledge of biodiversity priorities when making decisions about appropriate habitats to enhance and create.

Principle 7: Be additional

Achieve nature conservation outcomes that demonstrably exceed existing obligations.

Principle 8: Create a Net Gain Legacy

Ensure that net gain creates long-term sustainable benefits by mitigating risk and planning for long-term resilient management.

Principle 9: Optimise sustainability

Consider wider environmental benefits for societal and economical sustainability.

Principle 10: Be transparent

Communicate the net gain process and assessment, including justifications for decision making, to all stakeholders.

THE STATUTORY BIODIVERSITY METRIC

- 20.3 Whilst the metric can aid decision making on the areas a specific habitat types to be enhanced or created, the overall assessment should consider the principles of biodiversity net gain holistically alongside calculation scores.

Principles of the Statutory Metric

- 20.4 The Biodiversity Metric calculation has been undertaken in accordance with the principles set out within The Statutory Biodiversity Metric Draft User Guide (Defra, 2024) as follows:

Principle 1: The metric assessment should be completed by a competent person.

Principle 2: The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.

Principle 3: This biodiversity metric should be used in accordance with established good practice guidance and professional codes.

Principle 4: This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.

Principle 5: Biodiversity units are a proxy for biodiversity and should be treated as relative values.

Principle 6: This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.

Principle 7: Habitat interventions need to be realistic and deliverable within a relevant project timeframe.

Principle 8: Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.

Principle 9: The metric does not enforce a minimum habitat size ratio for compensation of losses. However, proposals should aim to:

- maintain habitat extent (supporting more, bigger, better and more joined up ecological networks)
- ensure that proposed or retained habitat parcels are of sufficient size for ecological function

Rules of the Statutory Metric

20.5 In addition to the set of guiding principles, the biodiversity units are calculated using a set of 5 'rules' as detailed by Defra within The Statutory Biodiversity Metric Draft User Guide (Defra, 2024) as follows:

Rule 1: The trading rules of the biodiversity metric must be followed.

Rule 2: Biodiversity unit outputs, for each unit type, must not be summed, traded or converted between types. The requirement to deliver at least 10% net gain applies to each type of unit.

Rule 3: To accurately apply the biodiversity metric formula, you must use the biodiversity metric calculation tool or small sites biodiversity metric tool.

Rule 4: In exceptional ecological circumstances, deviation from this metric methodology may be permitted by the relevant planning authority.

21. APPENDIX 5: OVERVIEW OF BNG IN PLANNING PROCESS

Please see overleaf

Biodiversity Net Gain

BASELINE TO PLANNING APPROVAL

