

Biodiversity Net Gain Assessment

Site Address:

Land Adjacent to Gravesend Veterans Club, Clarence Place, Gravesend, Kent, DA12 1LB

Client:

Eddie Powell

Assessment Date:

9th March 2026

Project:

This report is prepared to inform a planning application with the Gravesham Borough Council. The proposal is described as:

Construction of a single dwelling divided into flats.

BNG assessment methodology and legislation can be found in the Arbtech Supplement: **BNG Methodology and Legislation – 2025.**

The results and recommendations contained within this report are valid for 18 months. An updated site visit and BNG assessment may be required if the report is to be used any longer than 18 months after completion.

Version Control			
Status	Issue	Name	Date
Draft	0.1	Jamie-Lee Anderson BSc (Hons), Consultant Ecologist	25/10/2024
Final	1.0	Jamie-Lee Anderson BSc (Hons), Consultant Ecologist	14/11/2024
Amended	2.0	Jamie-Lee Anderson BSc (Hons), Senior Ecologist	09/03/2026

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Site Location and Context

A baseline habitat map is provided in **Appendix 1**, a post development habitat map in **Appendix 2**, a proposed development plan in **Appendix 3**, and headline BNG results in **Appendix 4**.

The site is located at National Grid Reference TQ 6487173485 and has an area of approximately 0.03ha. the site is characterised by an amenity garden with scattered trees located in the northern and southern peripheries of the site.

This report should be read in conjunction with the following documents:

- Statutory BNG Metric: Statutory Metric – Land adjacent to Gravesend Veterans Club, DA12 1LB V2 (Arbtech Consulting Limited, 2026)
- Proposed Plan: Proposed Site Location Plan (Target Carbon Management, 2026)
- Preliminary Ecological Appraisal (PEA): Land Adjacent to Gravesend Veterans Club, DA12 1LB (Arbtech Consulting Limited, 2024)

Executive Summary

The development results in a net loss of -45.56% area habitat units. The proposed development is currently **not** compliant with legislation.

Introduction

BNG Informative		
Habitat Degradation Statement	Date reflected by BNG calculations	13 th August 2024
	The baseline biodiversity value of the site is derived from the site as observed during the PEA field survey (Arbtech Consulting Ltd., 2024). As evident in the screenshots of satellite imagery obtained from GoogleEarth dated 6 th March 2020 and 14 th April 2024, the site does not appear to have undergone any degradation. The habitats on site, and therefore biodiversity value of the site, is not considered to have undergone degradation since 30 th January 2020.	
	imagery < 6 Mar 2020 > > 	
	imagery < 14 Apr 2024 > > 	
Irreplaceable Habitat Statement	No irreplaceable habitats as listed under the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024) are currently present nor were present before 30 th January 2020.	
Metric Version & Publication Date	Statutory Biodiversity Metric Calculation Tool first published 29 th November 2023 with last updates to metric tools and user guides on 23 rd July 2024.	
BNG Target Uplift	+10%	

National Character Area (NCA)	113 - North Kent Plain
Strategic Significance	Gravesham Borough Council does not have its own standalone Local Nature Recovery Strategy (LNRS), but instead actively participates in the wider Kent & Medway Local Nature Recovery Strategy. Kent County Council is the responsible authority for this overarching regional strategy, which aligns with the Environment Act 2021, https://www.gravesham.gov.uk/downloads/file/1065/biodiversity-strategy-accessible- .
Limitations	
There were no specific limitations to the assessment.	

Baseline

Baseline Biodiversity Value: On-Site

Area-Based Habitats (A-1)

Habitat	Area (ha)	Description	Condition Assessment	Strategic Significance
Grassland	0.0187	Modified grassland	Poor – see PEA.	Low Strategic Significance
Heathland and shrub	0.0108	Bramble scrub	Habitat condition pre-determined as ' N/A ' as detailed within the Statutory Biodiversity Condition Assessment Supplement.	
Urban trees	0.0285	Seven small trees	Moderate – see PEA.	
	0.0651	Four medium trees		

Post-Development

Post-Development Biodiversity Value: On-Site

Area-Based Habitats

	Habitat	Area (ha)	Description	Condition Assessment	Strategic Significance
Retained (A-1)	Urban trees	0.0041	1 small tree retained	Moderate – see PEA.	Low Strategic Significance
		0.0326	Two medium trees retained		
Created (A-2)	Urban	0.0073	Proposed building	Habitat condition pre-determined as ' N/A ' as detailed within the Statutory Biodiversity Condition Assessment Supplement.	
	Urban	0.0059	Proposed hardstanding	Habitat condition pre-determined as ' N/A ' as detailed within the Statutory Biodiversity Condition Assessment Supplement.	
	Urban	0.003	Proposed vegetated garden, private garden	Habitat condition pre-determined as ' N/A ' as detailed within the Statutory Biodiversity Condition Assessment Supplement.	
	Grassland	0.0139	Modified grassland	Habitat anticipated to achieve good condition. Habitat Management and Monitoring Plan (HMMP) required.	
	Urban trees	0.0285	Proposed planting of seven small trees	Habitat anticipated to achieve moderate condition. Habitat Management and Monitoring Plan (HMMP) required.	

Change of Biodiversity Value

		Biodiversity Units		
		Area-Based	Linear-Based	Watercourse-Based
On-Site	Baseline	0.83	-	-
	Post-Development	0.45		
	Net Change	-0.38		
Overall Net Change		-45.56%	N/A	N/A

Results, Discussion, and Next Steps

BNG Informative	
Results	The current landscaping proposal generates a net loss of area-based habitat units (-45.56%) with unmet trading rules. In line with the Statutory Biodiversity Metric User Guide (2024), any loss of a habitat must be replaced on a like-for-like or like-for-better principle. At present, trading conditions are not satisfied for the loss of trees and scrub. With unmet trading conditions and a net loss, the proposal fails principal Rules 1 and 2 of BNG and is not compliant with current legislation (Environment Act 2021) and planning policies (National Planning Policy Framework, 2024). In order to achieve a +10% biodiversity net gain for area-based habitats, a minimum area-based unit score of 0.91 will need to be achieved. At present, there is a unit deficit of 0.46 units.
Recommendations and Next Steps	In order to achieve the required net gain in biodiversity as a result of the proposed development, the provision of additional or alternative landscaping should be explored and the proposed plans amended accordingly to achieve a net gain on site. The provisioning of additional landscaping should first be considered within the site boundary. There is limited scope on site, and this provision may not be possible to achieve on site or adjacent with the current arrangement (within the redline boundary or offsite on other owned land) considering the size of the proposed development area and the limited amount of soft landscaping within the parcel. Based on the proposed plans, it is unlikely that net gain will be achieved by ways of habitat creation/enhancement without significant changes to the proposals on site or require unfeasible commitments off-site. As such, a financial contribution to off-site ecological enhancements (i.e. purchasing biodiversity units) within an approved scheme is required to make up the +10% net gain for area-based habitat units. The mechanism for securing this off-setting will need to be proposed to and confirmed by the LPA and would be linked to the application through a planning obligation Section 106 (s106) agreement. The proposed habitat compensation must be of an appropriate distinctiveness to meet the trading rules of BNG.
Pre-Commencement	A Biodiversity Gain Plan (BGP) and Habitat Management and Monitoring Plan (HMMP) must be produced for the site. This should include recommendations for the implementation, management and monitoring of the site for at least 30 years to ensure that biodiversity net gain is delivered.

	These additional requirements can only be actioned following the finalisation of the BNG assessment – be it on-site or off-site net gains sought.
BNG Mitigation Hierarchy	
Avoidance	The site layout has been designed to retain three trees at the rear of the site and a large portion of the grassland, avoiding direct impacts on these habitats.
Minimisation	Impacts on grassland have been minimised by restricting the construction footprint to the north. Protective fencing will be installed to safeguard retained trees during works.
Mitigation	Although the development requires the loss of modified grassland and trees, habitat loss has been minimised where possible. Buffer planting has been incorporated to reduce edge effects on retained habitats. Grassland creation and new tree planting has been proposed.
Offset	The unavoidable loss of low distinctiveness grassland has been offset through on-site creation of good condition modified grassland, tree planting and additional off-site habitat delivery secured via the BNG register.

Appendix 1: Baseline Habitat Plan



Appendix 2: Post-Development Habitat Plan



Appendix 3: Proposed Development Plan



Appendix 4: Headline BNG Results

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-0.38
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-45.56%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	0.83	0.91	0.46
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

Total net gain achieved is less than target set ▲

No additional hedgerow units required to meet target ✓

No additional watercourse units required to meet target ✓

Input errors/rule breaks present in metric ▲