



3rd May 2024

File Note: BNG for Kesson House

Ref: Biodiversity Net Gain (BNG) statutory version reporting file note

Site address: Kesson House, Northfleet, Kent, DA11 9HN

National Grid Reference: Centred on TQ 6213 7422

Site area: 0.31521 BNG project area assessed.

Recipients: Atelier-SM Architects

BNG change summary.

	Area units	Linear units	Watercourse
% Change	-9.83%	+0.00%	N/A
More units required for a 10% net gain	0.05 more area units.	0.01 more linear units (rounded up as displays 0.00 in metric due to small areas)	N/A

Record of activity

➤ **Background**

Arbtech consulting Ltd were instructed by Atelier-SM Architects to undertake a Biodiversity Net Gain (BNG) evaluation of a development on the site, subject to a planning application with Gravesham Borough Council for:

- The rebuilding of a care home.

➤ **Purpose of survey**

The National Planning Policy Framework (NPPF) makes it clear (para 170) that “Planning policies and decisions should contribute to and enhance the natural and local environment by; minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”.

Paragraph 174 requires the promotion of “the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”.

Proposals for net gain should be clearly recorded and reported through use of an appropriate metric such as the DEFRA statutory Biodiversity Metric. Natural England advise that any net gain should be fully secured and funded for the lifetime of the development.

The 10% target was set by the government to be the standard minimum net gain required by BNG.

Therefore, the purpose of this survey report is to provide an evaluation of the proposed plans compared to the ecological baseline, and to report any net gain (or loss) to biodiversity using the DEFRA statutory Biodiversity Metric scheme.

➤ **Surveyor and date of survey**

This survey report was carried out by Craig Williams, BSc (Hons), MSc, DIC, MRSB of Arbtech Consulting Ltd. iteratively, with the latest version on 2nd May 2024. A previous preliminary ecological appraisal (PEA) is used as the ecological baseline and was carried out on 25th March 2024. The baseline habitat map and the current proposed plan are found in appendix 1 and 2.

Site-specific BNG methodology notes

- None

Summary findings

- The full results of the metric are included in the excel file:

Statutory_Biodiversity_Metric_Calculation_Tool (Kesson House DA11 9HN) v1

This highlights that the current change in the biodiversity habitat metric is:

- -9.83% in habitat units
- +0.00% in linear units

- The results indicate a net loss in habitat area units. This is mainly due to the loss of baseline areas of ruderal herb and garden, with compensatory garden areas worth slightly less units. No changes in the baseline hedges result in no net gain or loss in linear units.

Unit change discussion

- The currently proposed plan results in a 9.83% net loss in habitat units (a loss of 0.02 area units from a baseline of 0.23). By default, this also fails habitat trading rules although none above low distinctiveness. It also results in a 0.00% net gain in linear units, not gaining or losing any from a baseline of 0.02 units.
- The change in area and linear units are both less than the overall positive target of biodiversity net gain (10% gain) and is unlikely to be sufficient for planning approval based on the policy outlined above.

BNG metric update recommendations

- Updated proposed plans could be used to recalculate the metric. The updated plans should aim to retain more of the baseline habitat but would otherwise need to include 0.05 more area units, as well as 0.01 more linear units (rounded up). This could include areas of meadow grass or scrub with new native trees within, new lengths of native hedge planting, green roofs or green walls.
- The deficit in area units is calculated by the cost to meet the net gain target of 10% more than the 0.23 baseline level in habitat units (0.26, rounded in the metric), with the proposed area habitat value of the currently proposed site (0.21) subtracted (0.05 units).
- The deficit in linear units is calculated by the cost to meet the net gain target of 10% more than the 0.02 baseline level in habitat units (0.03, rounded in the metric), with the proposed linear habitat value of the currently proposed site (0.02) subtracted (0.01, rounded).
- This provision may be possible to fully 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 amount of soft landscaping within the parcel, with the addition of the measures recommended above.

Creation and management

- The creation and management of any significant habitats on the compensation site to the appropriate condition would need to be secured for at least 30 years - linked to the application through a planning obligation in Section 106 (S106) agreement.

- If the plans are not changed and no other significant ecological habitats are proposed on site, the habitat deficit of 0.05 area units and 0.01 linear units can be compensated for on other off-site land owned by the client, a third party habitat banking scheme where these units can be bought, or a financial contribution to off-site ecological enhancements within the government's approved statutory biodiversity credits scheme, or with the LPA directly through a s106 agreement. One or a mixture of these routes is required to make up to the overall net gain for area units. This approach is also only to be used after exhausting all possibility of achieving net gain on site or nearby, and also after exploring if any habitat can be retained on site as far as possible.

Statutory credits cost

- As a last resort, the costs for BNG compensation using statutory credits have been issued by the government as outlined here:

<https://www.gov.uk/guidance/statutory-biodiversity-credit-prices>

- Statutory biodiversity credit prices are not guideline prices for biodiversity units sold in the off-site private market. Prices are based on the cost to create, maintain and monitor different habitat types. There is also a mark-up to prevent statutory credit prices undercutting the off-site market.
- These units may be cheaper to source in the local third party BNG unit market, or in collaboration with the LPA.
- If you buy statutory biodiversity credits, a 'spatial risk multiplier' (SRM) will apply, which doubles the amount of statutory credits you need.
- For each habitat type in the table, you can see its 'tier'. Statutory biodiversity credits are priced in tiers according to habitat type for area-based biodiversity units. There are separate prices for hedgerow and watercourse biodiversity units.
- For the units required for this development, this would equate to:

Area units

0.09 tier A1 units at £42,000 per credit = £3,780

0.01 (rounded) tier H units at £44,000 per credit = £440

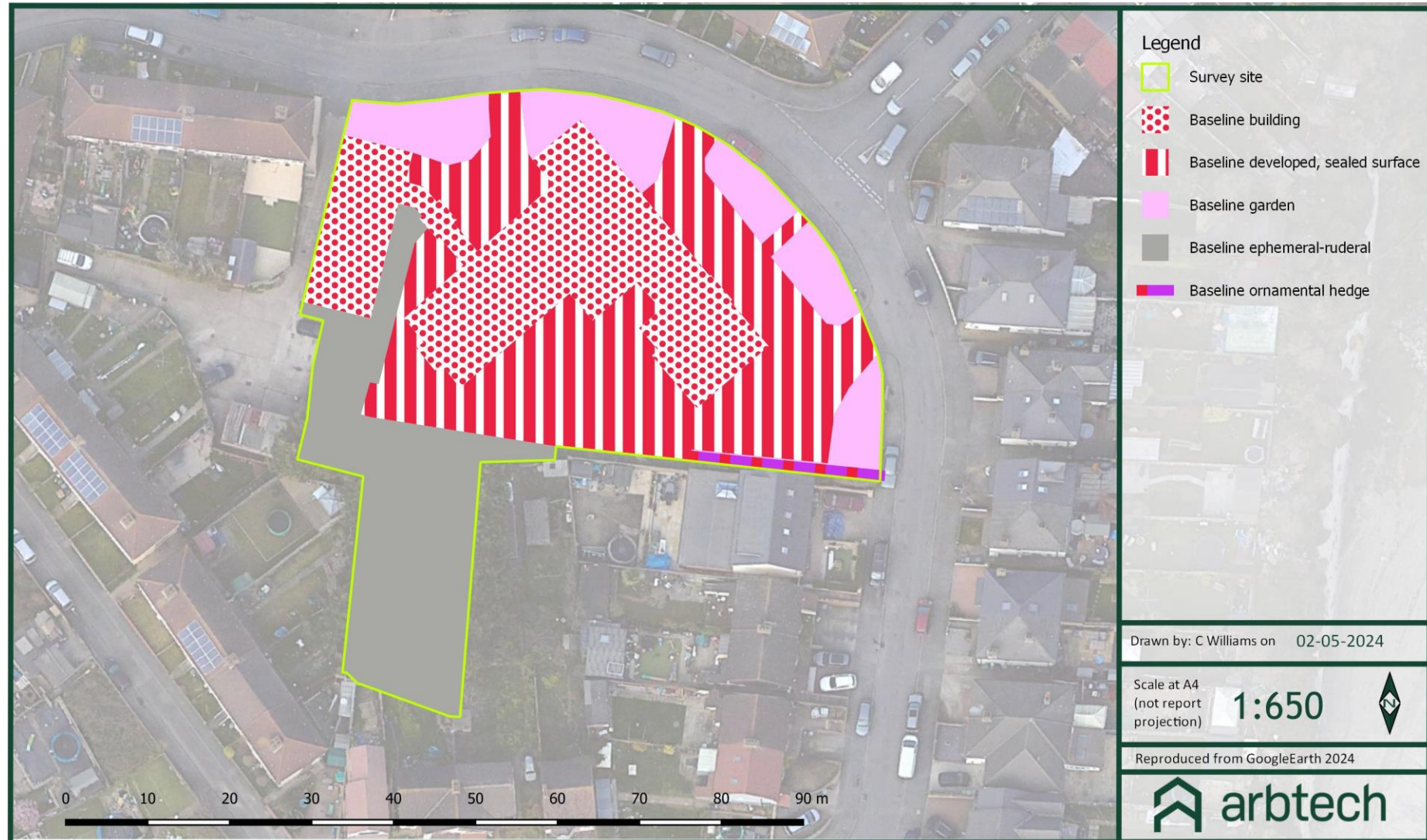
These prices do not include VAT. You will see VAT in the invoice for any statutory credit purchase.

- Whichever method (or combination) is chosen for the compensation, the specific mechanism for securing this compensation will need to be proposed to and confirmed by the LPA. As well as the creation of the habitat, this should also secure the management and monitoring of any significant habitat to the appropriate condition either on site or offsite for at least 30 years - linked to the application through a planning obligation in Section 106 (S106) agreement. This is likely to require a dedicated creation and management plan if created on site or off site by the developer themselves.

- Design statement

This report contains recommendations on measures for achieving BNG. These recommendations do not constitute a design for BNG. In submitting these recommendations, Arbtech Consulting has no Design Liability associated with these recommendations for BNG. The strategy sets out the criteria which the landscape team can use to design the creation and management of the site.

Appendix 1: Habitat baseline map



Appendix 2: Currently proposed ecological map of the site



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