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BIODIVERSITY NET GAIN - BIODIVERSITY STATEMENT

At

Woodland North of East Court Farm

Church Lane
Gravesend
Kent
DA12 2NL

NGR: TQ 68571 73075

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1 INTRODUCTION

1.1 Author and qualifications

This report is compiled and written by James Stubbs BSc MRes, Graduate Ecologist for United Environmental Services Ltd (UES).

It has been verified by Mark Halliwell MBIol, UES Senior Ecologist. Mark holds a level 4 BSBI FISC, which certifies him as competent to undertake phase 1 habitat surveys and national vegetation classification (NVC) surveys.

1.2 Proposed development

The proposed development includes the construction of seven glamping pods with associated access roads, car parking, pathways and landscaping to provision for amenity / recreational use and biodiversity conservation.

1.3 Survey objectives

This biodiversity statement has been produced for the proposed development at Woodland North of East Court Farm, Gravesend. UES was commissioned in May 2025 to prepare the Biodiversity Statement as part of a Biodiversity Net Gain Assessment of the proposed development. This was completed in order to:

- Establish the baseline value of the site by calculating the number of habitat, hedgerow and watercourse units at the site of the proposed development.
- If detailed or indicative plans are available, establish the post development value of the development by calculating the number of habitat, hedgerow and watercourse units which will be created, retained and / or enhanced as part of the proposals.
- Provide guidance on habitat retention, creation and enhancement measures to inform proposed site layout and landscaping proposals and to maximize potential gains in biodiversity.
- Provide details of how offsite compensation will be used when a 10% biodiversity net gain cannot be achieved on site.



2 PLANNING POLICY

Paragraphs 180(d), 185(b) and 186(d) of the National Planning Policy Framework (NPPF) set out requirements for the delivery of BNG. In England, BNG is mandatory under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

Under the statutory framework, subject to some exceptions, every grant of planning permission is granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitats.

Mandatory BNG only applies for planning permission applications made on or after 12th February 2024. Permissions granted for applications made before this date are not subject to BNG. A temporary exclusion applies for non-major developments whereby mandatory BNG only applies for planning permission applications made on or after 2nd April 2024.

The Environment Act 2021 sets out the following key components to mandatory BNG:

- Minimum 10% gain required calculated using DEFRA Statutory Biodiversity Metric & approval of net gain plan
- Habitat secured for at least 30 years via obligations / conservation covenant
- Habitat can be delivered on-site, off-site or via statutory biodiversity credits
- There is a national register for net gain delivery sites
- The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss
- Also applies to Nationally Significant Infrastructure Projects (NSIPs)
- Does not apply to marine development
- Does not change existing legal environmental and wildlife protections



3 METHODOLOGY

The BNG assessment has been undertaken using the DEFRA Statutory Biodiversity Metric. The metric was used to calculate baseline habitat, hedgerow and watercourse units. A UK Habitat Classification survey was undertaken as part of a Preliminary Ecological Appraisal (PEA) of the site, undertaken by Mark Halliwell on 22nd May 2025. Surveyors present included:

- Mark Halliwell MBiol, UES Senior Ecologist. Mark holds a level 4 Botanical Society for Britain and Ireland (BSBI) field identification skills certificate (FISC), which certifies him as competent to undertake phase 1 habitat surveys, UKHab and national vegetation classification (NVC) surveys.

Habitats recorded within the proposed development site were mapped on a UK Habitat Classification plan provided at Appendix 1.



4 RESULTS

4.1 Baseline assessment

The proposed development site has an area of approximately 0.916ha and contains large areas of dense scrub with areas of bare ground where vegetation removal along an access track has occurred. There are several earth bunds located between the bare ground and dense scrub within the northern section of the site. The southern section of the site contains areas of modified grassland, introduced shrub and hardstanding areas with a small number of temporary buildings. There are also two ponds located within close proximity to the site.

The baseline value of the site has been calculated as 4.17 habitat units, 0 hedgerow units and 0 watercourse units using DEFRA's Statutory Biodiversity Metric.

The DEFRA Statutory Biodiversity Metric used to calculate the baseline value of the site has been submitted with this report and provides full details of the calculations.

4.2 Post-development assessment

Detailed landscaping plans are available, upon which the post development value of the site has been calculated (see Kirsten Bowden Chartered Landscape Architect's Landscape Proposals Plan Drawing Number reference: 2024_58/001 Rev. C for Site East Court Farm, Church Lane, Gravesend, dated 12.05.2025).

The habitat units onsite will increase to 4.32 (a net gain of 3.71%), hedgerow will increase to 2.10 (zero baseline units so percentage cannot be calculated), and watercourse units remain unchanged at 0 units.

The DEFRA Statutory Biodiversity Metric used to calculate the post-development value of the site has been submitted with this report and provides full details of the calculations.

5 EVALUATION AND RECOMMENDATIONS

5.1 Biodiversity net gain requirements

The baseline value of the site has been calculated as 4.17 habitat units and 0 hedgerow and watercourse units.

In order to achieve a 10% net gain in biodiversity, the post development value would need to be 4.59 habitat units, therefore a unit deficit of 0.26. No gain in hedgerow or watercourse units is required under biodiversity net gain requirements due to the baseline values of 0.

In addition to providing the 10% net gain in habitat units required to adhere to national planning policy, the metric's trading rules must also be met to provide an acceptable net gain. This is a function of the metric that has been designed to ensure habitats are compensated for sufficiently.

To adhere to the metric's trading rules, losses must be replaced by habitat, hedgerow and watercourse units of the same broad habitat type and distinctiveness, or by units from any habitat with a higher distinctiveness regardless of the broad habitat type. Based on the details provided to UES at this stage, additional biodiversity units required to meet the trading rules are:

- 0.10 habitat units of medium distinctiveness Heathland and shrub, to take into account the losses of mixed scrub habitat onsite, or any habitat from a higher distinctiveness band (from any broad habitat type).

5.2 Recommendations

Where possible, onsite habitat creation and enhancement will be prioritised to maximise net gain within the proposed development site.

In terms of grassland, the creation of 0.21ha of additional modified grassland will form an important habitat creation measure across the site as a whole and as part of the landscaping for the amenity and recreational value of the site, especially where the grassland occupies former areas of hard standing, such as in the southern section of the site. It is anticipated that this grassland will form a lawn that is regularly mown to provision for access and amenity purposes across the campsite. Despite the rigid management, it is possible to sow a mix of forbs and grass species to allow the grassland to reach good target condition in terms of containing at least 6 species per m², and ensuring that the mowing events are appropriately staggered to avoid excessive ground disturbance. Furthermore, as part of the landscape proposals there will be four main areas of wildflower grassland created, which would be sown with an Emorsgate EM1 Basic General Purpose Meadow Mixture, and expected to reach Moderate target condition. This includes a strip adjacent to the new glamping lodges and footpaths in the far southern section of the site, and a strip adjacent to the newly created area of scrub in the central section of the site, amounting to 0.0881 ha in total. The grassland will be subject to a more sympathetic management approach compared to the areas of modified grassland. This includes delayed and staggered cutting regimes to provide areas of taller sward heights and better allow vegetation to establish. The habitat creation will target a diversity of tall forbs through the sowing of key indicator species associated with neutral grassland and wildflower meadows, for example common knapweed and oxeye daisy, plus slow-growing grass species such as crested dog's-tail and red fescue.



In terms of scrub creation, an additional 0.1857 ha of mixed scrub planting will take place in the central western section of the site, occupying the former modified grassland field. This will include a native shrub mix, using species such as hawthorn, blackthorn, hazel, holly and goat willow. The scrub will border the newly created car park area directly to the south and the wildflower grassland area directly to the east, and therefore would form an important feature of the habitat mosaic within the site. The scrub would be expected to achieve moderate condition through solely containing native species, including at least three native woody species and mixed planting such that not one species would comprise more than 75% of the cover, an absence of invasive non-native invasive plant species, areas of tall grassland bordering the scrub along most of its length, and the creation of rides to provide open areas within the scrub, for example. In addition, seventeen small trees will be planted onsite as part of the current landscape proposals, which would be expected to achieve moderate condition. The trees will be planted across different locations within the site, however principally in proximity to the glamping lodges in the southern and northern sections of the site. The trees will be native and most likely comprise species adapted to open areas with high light infiltration, such as rowan, silver birch, and pedunculate oak, for example.

In addition to the habitat creation measures specified above, four hedgerows are proposed to be planted across different sections of the site boundaries. This includes a native hedgerow with two proposed trees, to be located along a section of the southern site boundary, adjoining the area of newly created neutral grassland, and a native hedgerow with twelve proposed trees, to be located along the main section of the western site boundary, adjoining the areas of newly created amenity grassland and mixed scrub habitats. Furthermore, there will be a native hedgerow planted along the southern section of the eastern site boundary, adjoining the area of modified grassland. Finally, there will be a native hedgerow located along a section of the western site boundary adjacent to the area of modified grassland in proximity to the glamping lodges in the southern section of the site. All hedgerows are expected to reach good target condition, with the exception of the native hedgerow with trees on the western site boundary, which would borders areas of likely disturbed ground with reference to the adjacent mown grassland and access track.

It is feasible that sufficient onsite habitat creation will be possible whilst facilitating the proposed development. To achieve a 10% net gain in biodiversity and satisfy the trading rules, additional scrub creation and tree planting could take place onsite. This includes an additional 0.016 ha of moderate condition mixed scrub creation, to provide a biodiversity uplift of 0.12 habitat units and satisfy the trading rules for medium distinctiveness habitats. Planting an additional twelve small trees onsite expected to reach moderate condition, further to the existing seventeen trees onsite, would provide a biodiversity uplift of 0.15 habitat units. The combined habitat creation measures would provide a total net change of 10.12% (0.42 habitat units) and satisfy the trading rules, based on the current landscaping proposals.

Depending on the extent of habitat enhancement and creation measures, there may be a requirement for any additional deficits in units to be provided through offsite compensation. This will either be secured on land within the developer ownership, or through a payment to a third-party landowner acting as a habitat bank.

All compensatory offsite habitat units secured will need to be registered on the Biodiversity Gain Site Register.

As a last resort and where offsite compensation cannot be secured in the local area, statutory credits will be purchased as compensation.

The information contained within this Biodiversity Statement is considered to be sufficient to allow the local planning authority to grant planning permission, with regards to statutory



biodiversity net gain requirements. Following approval of planning permission, the biodiversity gain condition will be applied to the permission, which must be discharged prior to the commencement of works.

A Biodiversity Gain Plan (BGP) must be prepared to discharge this condition. The BGP must include baseline and post-development Statutory Metric calculations based on the finalised site layout and landscaping proposals. It must also contain full details of secured offsite compensation (where necessary) and a Habitat Management and Monitoring Plan (HMMP), detailing the proposed establishment, management and monitoring of all offsite compensation and any significant enhancements onsite.

All retained, created or enhanced habitats that constate offsite compensation or onsite significant enhancements will need to be managed and monitored for a period of at least 30 years. This can be secured through a section 106 agreement or a conservation covenant.

Following submission of the Biodiversity Gain Plan, the local planning authority will have up to eight weeks to discharge the biodiversity gain condition.



6 CONCLUSION

The proposed development site has an area of approximately 0.916ha and contains large areas of dense scrub with areas of bare ground where vegetation removal along an access track has occurred. There are several earth bunds located between the bare ground and dense scrub within the northern section of the site. The southern section of the site contains areas of modified grassland, introduced shrub and hardstanding areas with a small number of temporary buildings. There are also two ponds located within close proximity to the site.

The baseline value of the site has been calculated as 4.17 habitat units and 0 hedgerow and watercourse units using DEFRA's Statutory Biodiversity Metric. In order to achieve a 10% net gain in biodiversity, the post development value would need to be 4.59 habitat units, therefore a unit deficit of 0.26. No gain in hedgerow or watercourse units is required under biodiversity net gain requirements due to the baseline values of 0.

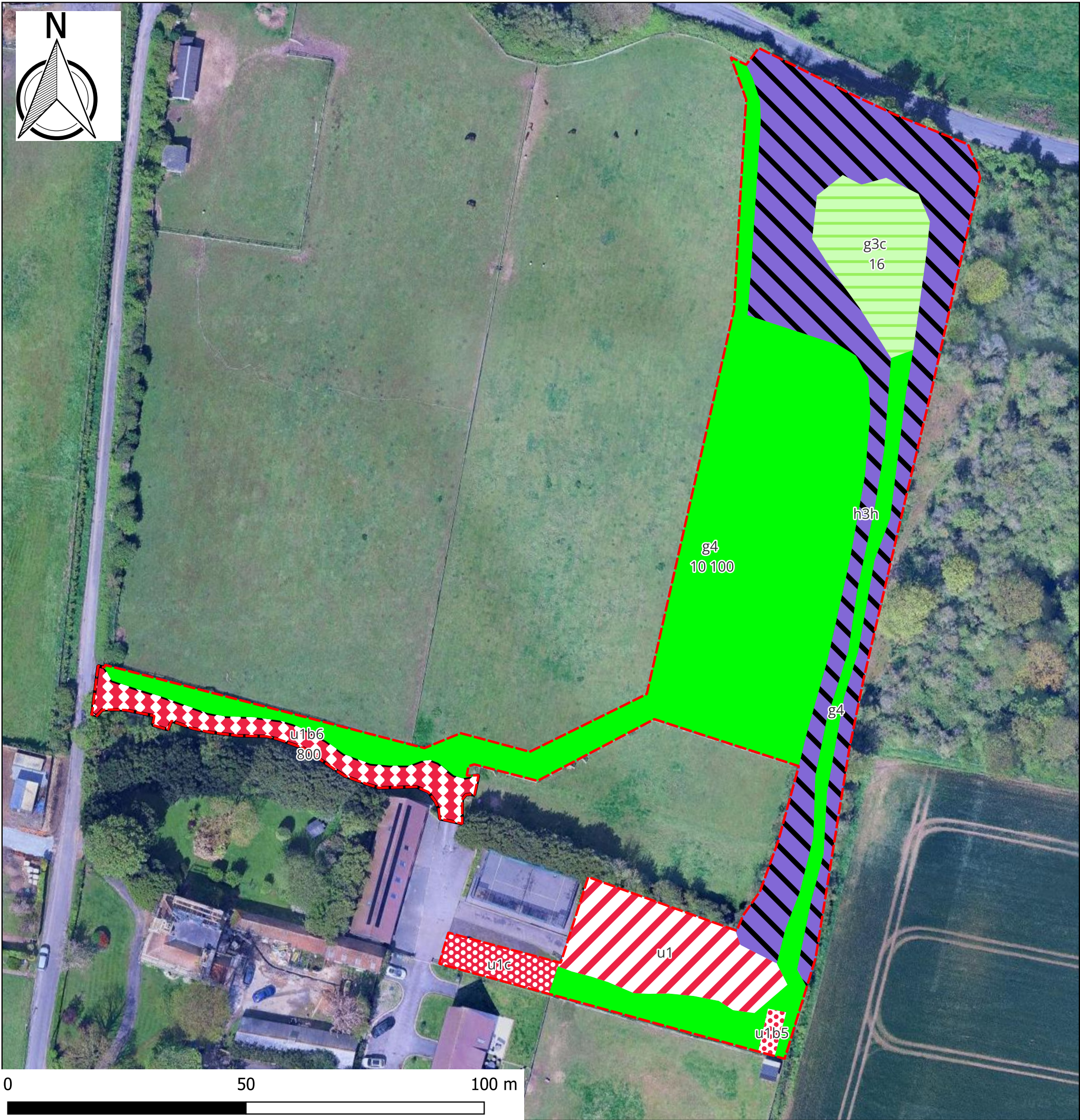
To satisfy the trading rules within the metric, any habitats that are to be lost as part of the proposed development must be compensated for with habitats of the same distinctiveness and same broad habitat type, or any habitat of higher distinctiveness.

Where possible, onsite habitat creation and enhancement will be prioritised to maximise net gain within the proposed development site. Depending on the extent of the habitat enhancement and creation measures, there may be a requirement for any additional deficits in units to be provided through offsite compensation.



APPENDICES

Appendix 1 – UK Habitat Baseline Classification Plan



UK Habitat Baseline Classification Plan

**Site: Woodland North of
East Court Farm, Kent
NGR: TQ 68571 73075
Author: James Stubbs
Date: 16/09/2025**



Key

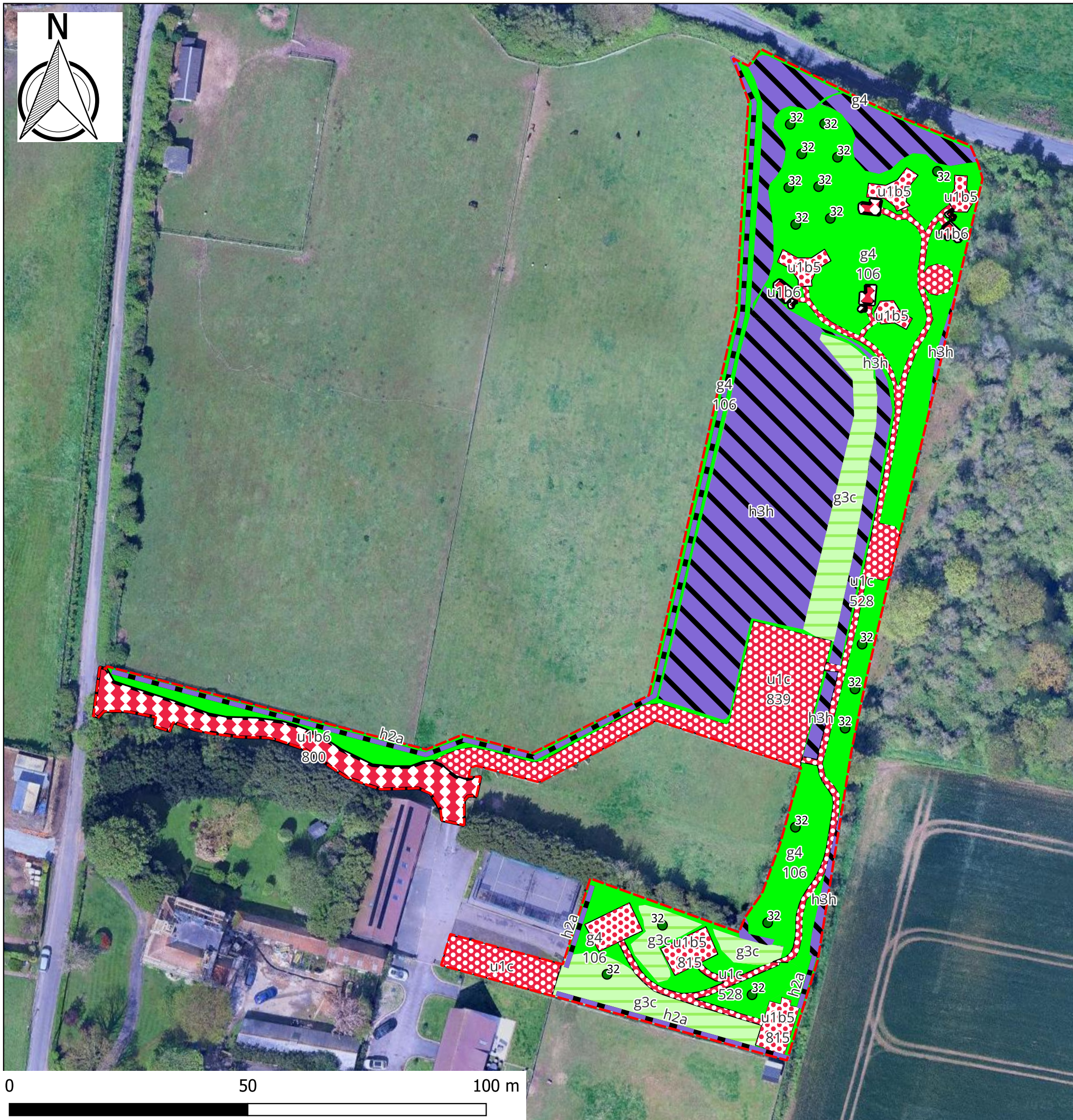
- g3c - other neutral grassland
- g4 - modified grassland
- h3h - mixed scrub
- u1 - built-up areas and gardens
- u1b5 - buildings
- u1b6 - other developed land
- u1c - artificial unvegetated unsealed surface
- Survey boundary

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Appendix 2 – UK Habitat Post Development Classification Plan



UK Habitat Post Development Classification Plan

Site: Woodland North of
East Court Farm, Kent
NGR: TQ 68571 73075
Author: James Stubbs
Date: 16/09/2025



Key

- g3c - other neutral grassland
- g4 - modified grassland
- h3h - mixed scrub
- u1 - built-up areas and gardens
- u1b5 - buildings
- u1b6 - other developed land
- u1c - artificial unvegetated unsealed surface
- h2a - native hedgerow
- 32 - scattered trees
- Survey boundary

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