



ECOLOGICAL EXPERTISE, EVOLVED

Blackthorn Farm, Culverstone Green

Technical Note: Biodiversity Net Gain Validation Statement

Prepared on behalf of

Esquire Homes

Final

17 September 2025

32/74-4B

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Report Release Sheet

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Map

Map 1 On-site BNG Baseline: Area Habitats and Hedgerows

Map 2 On-site BNG Post-Development: Area Habitats and Hedgerows

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This Statement provides the minimum statutory information required for Gravesham Borough Council (GBC) to validate the planning application for the Proposals, as set out in Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended by The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024). It also provides the additional information required by GBC in their online planning guidance for Biodiversity Net Gain.

EPR hereby confirms that the Applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition.

The on-site pre-development biodiversity value is taken to be the date that the Application is submitted. No activities resulting in a loss of on-site biodiversity value (degradation) have taken place between 30th January 2020 and this date.

A completed Statutory Biodiversity Metric Calculation Tool (published July 2025) has been submitted with the Application. This shows the calculations of the pre-development biodiversity value of the on-site habitat on the date of application. The baseline on-site biodiversity value is calculated as follows:

- 42.47 Area Habitat units
- 4.27 Hedgerow units

Plans, drawn to an identified scale and showing the direction of North, are included within this document (**Map 1**) showing the on-site habitat existing on the date of application, including any irreplaceable habitat present.

The following irreplaceable habitats are present on-site:

- **FM1, FM2 and FM3** – Individual Rural Trees - three BNG Veteran Field Maple (trees T28, T29 and T49). Representing an old laid hedgerow tree features, with deadwood and ecological niches.
- **W1, C1 and C2** - Lowland Deciduous Woodland – A small woodland shaw supporting a diverse community of 16 Ancient Woodland Vascular Plants.

Whilst trees T28, T29 and T49 have been classified as veteran under the Biodiversity Net Gain (BNG) regulations, thereby highlighting their ecological importance in providing habitat and supporting biodiversity. However, the project arboricultural consultant confirms that these trees do not meet the criteria for veteran classification according to the National Planning Policy Framework (NPPF) and British Standard BS 5837:2012, which focus on specific structural characteristics, significant historical value, and notable signs of physiological aging

The Arboricultural Impact Assessment (AIA) confirms trees T28 and T29 can be retained, and through sensitive mitigation (pruning), T49 can also be retained whilst managing public safety risks.

Direct impacts to the woodland shaw have also been avoided via sensitive design, and the provisional detail associated with this is provided in the submitted Outline Ecological Assessment. Further detail will be provided in an Ecological Impact Assessment, in due course.

Map 2 provides an outline design for the on-site proposals, and initial calculations to understand the Biodiversity Net Gain position of the project have been completed. These are provided in the associated *EPR Statutory Biodiversity Net Gain Calculation Tool – 3A and Condition Assessment sheets*. Provisional calculations indicate a net loss of 17.23 area units (-40.45%) and a net gain of 0.59 in hedgerow units (13.91%).

The on-site Biodiversity Net Gain figure is likely to change post-validation as the precise details of the ecological design measures within the red-line of the Site are refined. It is anticipated, that 10% BNG will be delivered through a combination of on-site and off-site measures, especially as there are now opportunities to secure off-site BNG units within Kent for a variety of habitat types of different levels of distinctiveness. As such, the Applicant commits to purchasing the number and type of units required to both achieve 10% and satisfy 'trading rules' if necessary. This includes agreeing 'bespoke mitigation measures' associated with the lowland meadow on-site, and the details of the 'bespoke mitigation' can be secured via a pre-commencement planning condition (see below).

At this stage, details associated with the uplift in 'Area Habitat Units' are still to be finalised and therefore should be secured via the pre-commencement "Biodiversity Gain Condition" as set out in government guidance.

Should planning consent be granted, a detailed Habitat Management and Monitoring Plan (HMMP) will be submitted to GBC alongside the detailed Biodiversity Gain Plan to discharge the pre-commencement "biodiversity gain condition". These documents will include the final BNG metric calculation and proposals for achieving 10% BNG, including purchase details for any off-site units, and confirmation of how such provision will be secured, maintained and monitored for a minimum period of 30 years. This is anticipated to take the form of a planning obligation and/or legal agreement.

Maps

Map 1 On-site BNG Baseline: Area Habitats and Hedgerows

Map 2 On-site BNG Post-Development: Area Habitats and Hedgerows