

Biodiversity Net Gain Assessment



**Tyler
Grange**

**Land on St Albans Close,
Gravesham
14th April 2025**

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Summary

- S.1. This report has been prepared by Tyler Grange Group Limited on behalf of The Hill Group - Foundation 200. It sets out the findings of a Biodiversity Net Gain Assessment completed in relation to open space at St Albans Close, Gravesend, hereinafter referred to as 'the site'. The proposals are for the erection of eight Solohaus self-contained modular homes for homeless accommodation, with associated plant, bin and bike stores and landscaping.
- S.2. Due to the nature of the development, a pre-application exercise (ref: PRE20240281) was undertaken to determine what would be required with regards to biodiversity. Following the response it was deemed necessary for the Biodiversity Net Gain (BNG) report to be completed to set out the potential for net gain on site, no other reports with regards to biodiversity have been deemed necessary.
- S.3. The baseline habitats on site comprise modified grassland only. Post-development habitats include modified grassland, neutral grassland, urban trees, introduced shrub, and hardstanding.
- S.4. The metric undertaken for the site indicates that the development can achieve a minimum 10% net gain on site, providing a 0.08 habitat unit uplift (+12.75% gain), the required gain as per local and national planning policy and legislation.
- S.5. To deliver the above, the habitats will need to be maintained for at least 30-years post-development. This should be secured through a HMMP as a planning condition.



Section 1: Introduction and Context

- 1.1. This report has been prepared by Tyler Grange Group Ltd on behalf of The Hill Group - Foundation 200. It sets out the findings of a Biodiversity Net Gain (BNG) assessment at open space at St Albans Close, Gravesend, DA12 5RY (OS Grid Reference TQ 65827 72314), hereinafter referred to as 'the site'. See **Figure 1.1** for the site red line boundary.



Figure 1.1: Indicative Red Line Boundary (© Google Aerial Imagery)

- 1.2. A BNG assessment for the site was undertaken by Tyler Grange in April 2025 using Defra's latest BNG Metric (The Statutory Biodiversity Metric) which should be looked at in conjunction with this report (ref: 17906_Biodiversity Statutory Metric _10042025).
- 1.3. The design of the scheme has been informed by the BNG assessment process and the mitigation hierarchy, through avoiding impacts to habitats where possible, then minimising the impact, using mitigation, and finally compensating for a loss of habitat where this cannot be avoided.

Context

- 1.4. The site is approximately 0.16 ha in size and comprises modified grassland habitat only. The site is bounded on all sides by residential housing, with pockets of grassland in the form of gardens and public open space.



- 1.5. Following the pre-application response from Gravesham Council (ref: PRE20240281) it was determined that a Biodiversity Net Gain Report is needed to support the application. No other reports with regards to ecology are required thus far.

Aims and objectives

- 1.6. The aim of this report is to provide findings of the BNG calculation and assessment undertaken to accompany the project. The objectives of this process are outlined below with the assessment methodology detailed in **Appendix 1**:
- Demonstrate the application of the mitigation hierarchy through the design evolution of the site to inform the design of the scheme and to minimise impacts on biodiversity where possible;
 - Calculate the project's pre- and post-development biodiversity unit value ;
 - Determine the change in biodiversity units as a result of the proposed development and proposed on site enhancements for biodiversity; and
 - Advise on how the project will deliver a minimum of +10% BNG.
- 1.7. This BNG assessment has been undertaken with respect to the British Standard for BNG BS8683:2020 and this report follows the CIEEM BNG reporting guidance¹ and was completed with reference to the CIRIA BNG good practice principles for development².

Legislation and Planning Policy

- 1.8. The National Planning Policy Framework (NPPF) (Section 15, Paragraph 180) requires the planning system to aim to "contribute to and enhance the natural environment by: minimising impacts on and providing net gains for biodiversity, by establishing coherent ecological networks that are more resilient to current and future pressures minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures". Section 15, Paragraph 185 of the revised NPPF also promotes development to "identify and pursue opportunities for securing measurable net gains for biodiversity".
- 1.9. A 10% uplift in BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- 1.10. Policy CS12 (Green Infrastructure) of the Gravesham Local Plan Core Strategy (Adopted September 2014) states "...there will be no net loss of biodiversity in the Borough, and opportunities to enhance restore, re-create and maintain habitats will be sought... Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory

¹ CIEEM (2021). Biodiversity Net Gain Report and Audit Templates Chartered Institute of Ecology and Environmental Management, Winchester, UK.

² Baker, J. Hoskin, R. & Butterworth (2019). Biodiversity net gain: Good practice principles for development. A practical guide. Ciria, CIEEM & IEMA



provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.”

Mitigation hierarchy and good practice principles

- 1.11. The proposals for the site have been developed with reference to the ecological mitigation hierarchy which is central to the BNG process. This was applied by advising avoidance of damage to habitats, then minimising the impact and using mitigation, and finally compensating for a loss of habitat (see **Section 2**). Advice was, and continues to be, provided throughout the project to inform the development and landscape design to adhere to this and to achieve a minimum of +10% BNG (see Legislation and Planning Policy above).
- 1.12. The CIRIA BNG good practice principles for development³ (which include the mitigation hierarchy) were also applied at all stages of the assessment.

Quality assurance

- 1.13. All ecologists at Tyler Grange Group Ltd are members of CIEEM, or are working towards membership, and act under the direction of members, and abide by the Institute’s Code of Professional Conduct.

³ Construction Industry Research and Information Association (2019). Biodiversity Net Gain – Principles and Guidance for UK construction and developments.



Section 2: Baseline Assessment

Strategic Significance

- 2.1. No local strategic policy or objectives were identified which would classify the site habitats as being of strategic importance to the local area. In addition, consultation of Magic.gov mapping did not identify any part of the site as being located within a Network Enhancement Zone and as such the site habitats (both pre and post development) are assessed as being of Low strategic significance – “Area/compensation not in local strategy/ no local strategy”.

Baseline Habitats

- 2.2. The habitats present on site are summarised below in **Table 2.1**, along with a description of the likely composition of the main plant species present. Due to the nature of the singular baseline habitat it was deemed unnecessary to undertake a site visit to assess the grassland. To avoid under-valuing the habitat, despite the grassland likely having less than six species per metre (which this habitat needs to achieve to be considered anything above a ‘poor’ condition), the baseline has been classified as ‘moderate’ condition. The location of habitats are shown on the Baseline Habitat Features Plan (**Plan 1 - ref: 17906/P01**).
- 2.3. The results of the habitat surveys were used to inform the completion of condition assessments for all habitats, which were completed with reference to The Statutory Biodiversity Metric User Guide⁴ (see **Appendix 3 and 4**).

Table 2.1: Habitats and Flora

Habitat Type (UKHab)	Description and Species	Photograph
Modified Grassland <u>Primary code:</u> Modified grassland g4 <u>Secondary code(s):</u> Frequently mown 108	This habitat includes lawn grass mown short. Species likely present include perennial ryegrass <i>Lolium perenne</i> , daisy <i>Bellis perennis</i> , white clover <i>Trifolium repens</i> , and dandelion <i>Taraxacum officinale</i> . Habitat not subject to statutory protection.	

- 2.4. A summary of the BNG assessment of the baseline habitats is detailed below in **Table 2.2**. This includes their BNG unit value as calculated through the BNG metric (ref: 17906_Biodiversity Statutory Metric _10042025).

Proposals

- 2.5. The proposals for the site are for the erection of eight Solohaus self-contained modular homes for homeless accommodation, with associated plant, bin and bike stores and landscaping. The

⁴ DEFRA (2023) The Statutory Biodiversity Metric User Guide. 2023



modified grassland habitat (negligible ecological value) will be lost, with new grassland and native species planting to be implemented post-construction.

Mitigation hierarchy

- 2.6. The scheme has been designed to follow the mitigation hierarchy by avoiding ecological impacts as much as possible, this has been achieved by choosing the appropriate location for this development. Where impacts to habitats cannot be avoided, specific measures will be undertaken to mitigate and compensate any loss of habitats and impacts that occur, to ensure opportunities for wildlife are provided for the long-term, biodiversity increases, and an overall ecological enhancement occurs. The scheme has been designed to introduce habitats of higher ecological value, such as trees and species rich grassland, to the site.

Habitat Loss

- 2.7. A summary of the BNG assessment of the baseline habitats is detailed below in **Table 2.3**. This includes a breakdown of the habitats to be lost (modified grassland) and created as part of the proposals, their condition (see **Appendix 3**) and their BNG unit value as calculated through the BNG metric (ref: 17906_The Statutory Biodiversity Metric_10042025).

Future Management

- 2.8. Habitats created, retained and enhanced on the site will be maintained for at least 30 years post development to satisfy the conditions for BNG in the Environment Act 2021, as well as best practice guidelines⁵. This should be secured through a Habitat Management and Monitoring Plan (HMMP) as a planning condition. The management will be adapted based on monitoring results to ensure the best desired outcomes are achieved.

⁵ Construction Industry Research and Information Association (2019). Biodiversity Net Gain – Principles and Guidance for UK construction and developments.



Table 2.2: Baseline Habitats and BNG Unit Value Summary

Broad Habitat	Habitat Type	Area (ha)	Distinctiveness	Condition	BNG unit Value – Total	BNG unit Value – Retained	BNG unit Value – Enhanced	BNG unit Value – Lost
Grassland	Modified grassland	0.16	Low	Moderate	0.64	0.00	0.00	0.64

Habitats Created, Retained and Enhanced

- 2.9. Post-development, appropriate compensatory planting/habitat creation will be implemented to replace losses and create new habitats at the site that are not currently present, namely wildflower grassland and tree planting. The details of post-development planting are shown on page 2 of the pre-application response (see **Appendix 2**) and on **Plan 2 (ref: 17906/P02)**. The measurements of the created and enhanced habitats as well as their conditions and BNG unit value are detailed in **Table 2.3** below. Detail on post-development habitat conditions are provided in **Appendix 4**.

Habitat Creation

- 2.10. Hardstanding in the form of the modular homes, walkways, and bin and bicycle stores do not contribute to the ecological value of the site however, more ecologically valuable habitat than the baseline modified grassland is to be implemented, including 16 trees and wildflower grassland planting.

Table 2.3: Created Habitats

Broad Habitat	Proposed habitat	Area (ha)	Created/ Retained/ Enhanced	Distinctiveness	Baseline condition	Target condition	BNG unit Value – Final
Individual trees	Urban Tree	0.07	Created	Medium	N/A	Moderate	0.21
Urban	Developed land; sealed surface	0.05	Created	V.Low	N/A	N/A - Other	0.00
Urban	Introduced shrub	0.1	Created	Low	N/A	Condition Assessment N/A	0.02
Grassland	Other neutral grassland	0.05	Created	Medium	N/A	Moderate	0.32
Grassland	Modified grassland	0.05	Created	Low	N/A	Moderate	0.17



Section 3: Conclusions

3.1. The Statutory Biodiversity Metric calculated that the proposed development will result in a total net biodiversity unit change of:

- +0.08 habitat units equating to +12.75%

3.2. The headline results of the metric are shown in the screenshot in **Figure 3.1**.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	0.08
	<i>Hedgerow units</i>	0.00
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	12.75%
	<i>Hedgerow units</i>	0.00%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

Figure 3.1. Screenshot of the Statutory Biodiversity Metric Headline Results

- 3.3. The trading rules of the metric are satisfied as same distinctiveness or better habitats will be achieved for the habitats on site. New areas of both neutral grassland and modified grassland will be created to mitigate for the loss of the modified grassland on site. In addition, trees are to be planted to further enhance the site for biodiversity.
- 3.4. The proposed development will deliver +12.75% BNG for habitats, this BNG goes above and beyond the minimum +10% BNG requested by Gravesham Council for habitats and therefore the proposed development would be in conformity with relevant planning policy and legislation
- 3.5. To deliver these, the habitats will be maintained for at least 30-years post-development. This should be secured through a HMMP as a planning condition.



Appendix 1: Methodology

Desk Study

- A1.1. As part of the Biodiversity Net Gain Assessment completed by Tyler Grange, the strategic significance of the site, and its habitats were determined so as to identify and give extra value to any habitats in optimal locations or that meet local objectives for biodiversity. This process is informed by reviewing local plans and strategies and with habitats assigned a multiplier based in being of 'low', 'medium' or 'high' strategic significance⁶.
- A1.2. Due to the nature of the habitats on site, both pre and post development habitats are assessed as being of Low strategic significance – "Area/compensation not in local strategy/ no local strategy."

Metric calculations

- A1.3. The Statutory Biodiversity Metric operates by calculating the number of biodiversity units associated with a particular habitat type (both pre-and post-development) – the 'unit' value associated with each habitat type is calculated based on the following parameters:
- Size (in hectares)/Length (in km);
 - Distinctiveness (i.e. how rare/valuable a given habitat is);
 - Condition (i.e. how well the recorded habitat fits [or will fit] the standardised description of that habitat); and
 - Strategic significance (i.e. if the existing or proposed habitat is within an area formally adopted in the local plan for green infrastructure or biodiversity improvements).
- A1.4. When considering the creation of new habitats in the post-development site, other factors are also considered when calculating the 'unit' value of a given habitat and these are:
- Time to reach the target condition of each habitat; and
 - Difficulty category for the creation of a given habitat.
- A1.5. Habitat metric calculations were undertaken by Jessica Whittaker BSc (Hons) MSc, an experienced ecologist at Tyler Grange who is a suitably qualified person under the definition of the BS8683:2020⁷.

Application of Mitigation Hierarchy

- A1.6. Application of the mitigation hierarchy is fundamental to the ecological impact assessment process. This requires consideration of the following measures, in order of priority, for all potential

⁶ Natural England (2023). The Biodiversity Metric 4.0 User Guide: Natural England Joint Publication JP039.

⁷ The British Standards Institution (2021). Process for designing and implementing Biodiversity Net Gain Specification.



impacts, to determine the most appropriate mitigation, compensation and enhancement strategy for the project. This is taken into account within **Section 3** of this report and set out below:

- Avoidance – measures to avoid harm to ecological features;
- Mitigation – measures to avoid or minimise potential impacts as part of the design or guaranteed by planning controls;
- Compensation – measures required to offset significant residual negative effects following avoidance and mitigation; and
- Enhancement – measures over and above requirements for avoidance, mitigation and compensation to provide biodiversity net gain.

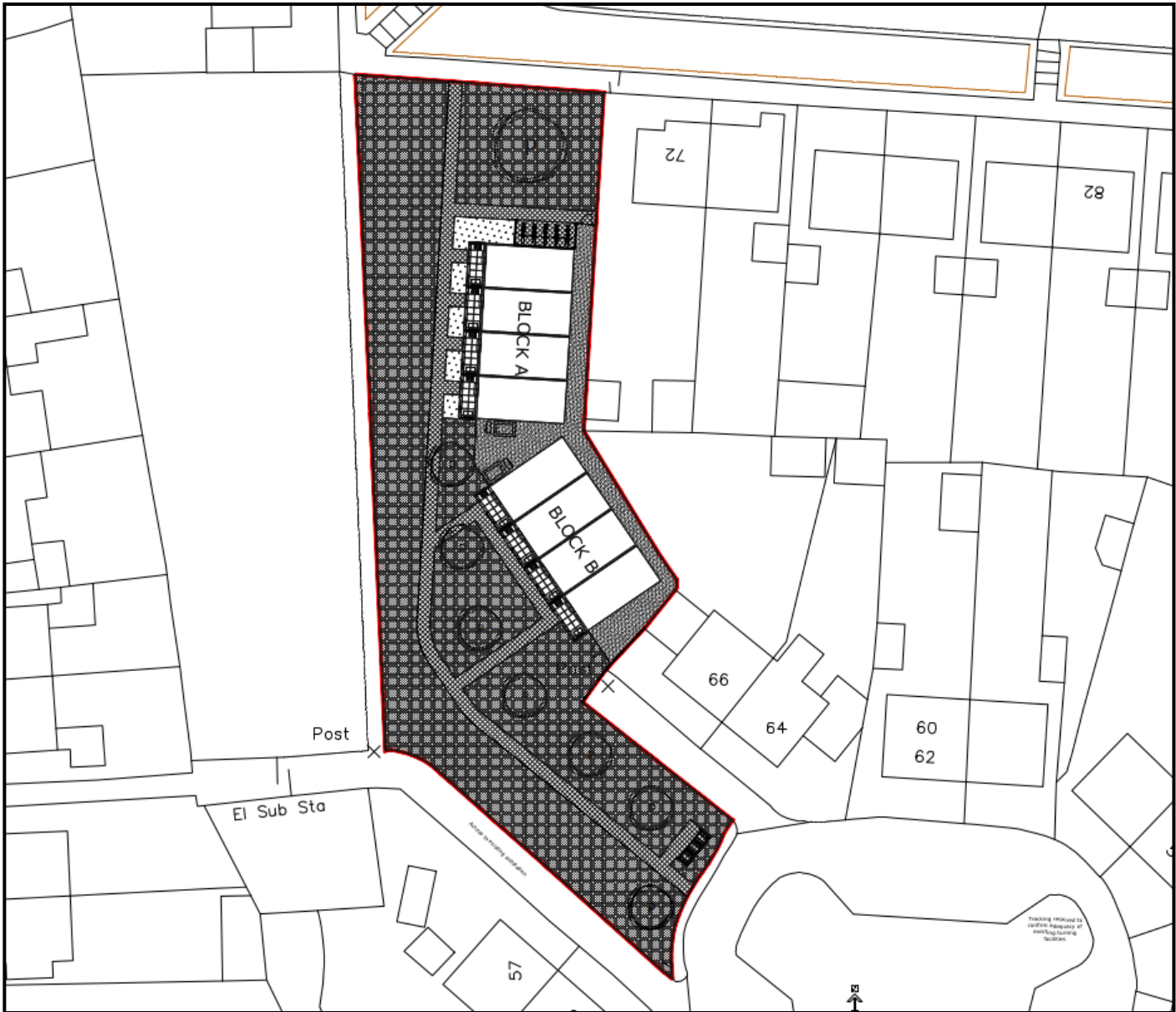
Limitations

- A1.7. The metric uses habitats as a proxy for biodiversity and does not account for other biodiversity enhancements such as species-targeted enhancements like bat and bird boxes. Detail on biodiversity mitigation and enhancement measures to be delivered outside of the BNG would be included a LEMP or HMMP.
- A1.8. When mapping and recording habitats, types and conditions were assigned using professional judgement and with reference to the appropriate guidance.
- A1.9. The post-development habitats were determined based on the outline landscape proposals, which have been used to identify the key habitats proposed. Whilst these have been developed for the application and they may be subject to change as part of the planning process, there is significant scope within the proposals to achieve a +10% gain and as such it is considered that a robust BNG assessment has been completed.



Appendix 2: Landscape Proposals





Appendix 3: Baseline Habitat Condition Assessments

- A3.1. The following tables provide a summary of the condition assessments completed with regards to the baseline site habitats described in the Section 3. These criteria in the below tables are taken from The Statutory Biodiversity Metric User Guide.
- A3.2. Note – as not to under-assume the condition of the grassland, whilst it is unlikely that there are between 6-8 vascular plant species per metre square within the site and would therefore be classified as ‘poor’ condition, it has been classified as ‘moderate’ condition.

Table 3.1: Modified Grassland (Low Distinctiveness Grassland Type)

Criteria	Details	Result
A – Species number	"There are 6-8 vascular plant species per m2 present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m2 (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet. "	Fail
B – Sward height	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Fail
C – Scrub	"Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. May be present). Note – patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type."	Pass
D – Damage	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Pass
E – Bare ground	Cover of bare ground is between 1% and 10%, including localized areas (for example, a concentration of rabbit warrens).	Pass
F – Bracken	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Pass
G – Invasive species	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA4).	Pass
Result	Pass 0-3 Criteria OR 4-6 Criteria but fails Criteria A = Poor / 4-5 Criteria (inc. Criteria A) = Moderate / 6-7 Criteria (inc. Criteria A) = Good	Moderate



Appendix 4: Post-development Habitat Condition Assessments

A4.1. The following tables provide a summary of the condition assessments completed with regards to the post development site habitats described in the Section 4. These criteria in the below tables are taken from The Statutory Biodiversity Metric User Guide.

Table 4.1: Individual Urban Tree

Criteria	Details	Result
A – Native species	The tree is a native species (or at least 70% within the block are native species).	Pass
B – Tree canopy	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Pass
C – Maturity	The tree is mature (or more than 50% within the block are mature).	Fail
D – Damage	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Pass
E – Ecological niches	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Fail
F – Oversailing vegetation	More than 20% of the tree canopy area is oversailing vegetation beneath.	Pass
Result	Pass 0-2 Criteria = Poor / 3-4 Criteria = Moderate / 5-6 Criteria = Good	Moderate

Table 4.2: Developed land; sealed surface (Urban Habitat Type)

No condition assessment required

Table 4.3: Introduced shrub (Urban Habitat Type)

No condition assessment required

Table 4.4: Other neutral grassland (Medium Distinctiveness Grassland Type)

Criteria	Details	Result
A – Habitat type	"The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type (and relative to Footnote 3 suboptimal species which may be listed in the UKHab description).¹ Note – this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only."	Pass



B – Sward height	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Pass
C – Bare ground	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Pass
D – Bracken	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Pass
E – Damage	"Combined cover of species indicative of suboptimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species⁴ (as listed on Schedule 9 of WCA5) are present, this criterion is automatically failed."	Fail
F – Vascular plant species	"There are 10 or more vascular plant species per m² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only."	Fail
Result	Pass 0-2 Criteria OR 3-4 Criteria but fails Criteria A and F = Poor / 3-5 Criteria (inc. Criteria A) = Moderate / 5-6 Criteria (inc. Criteria A and F) = Good	Moderate

Table 4.5: Modified Grassland (Low Distinctiveness Grassland Type)

Criteria	Details	Result
A – Species number	"There are 6-8 vascular plant species per m² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet. "	Pass
B – Sward height	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Pass
C – Scrub	"Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type."	Pass

D – Damage	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Fail
E – Bare ground	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Fail
F – Bracken	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Pass
G – Invasive species	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA4).	Pass
Result	Pass 0-3 Criteria OR 4-6 Criteria but fails Criteria A = Poor / 4-5 Criteria (inc. Criteria A) = Moderate / 6-7 Criteria (inc. Criteria A) = Good	Moderate

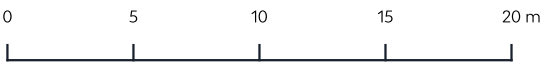
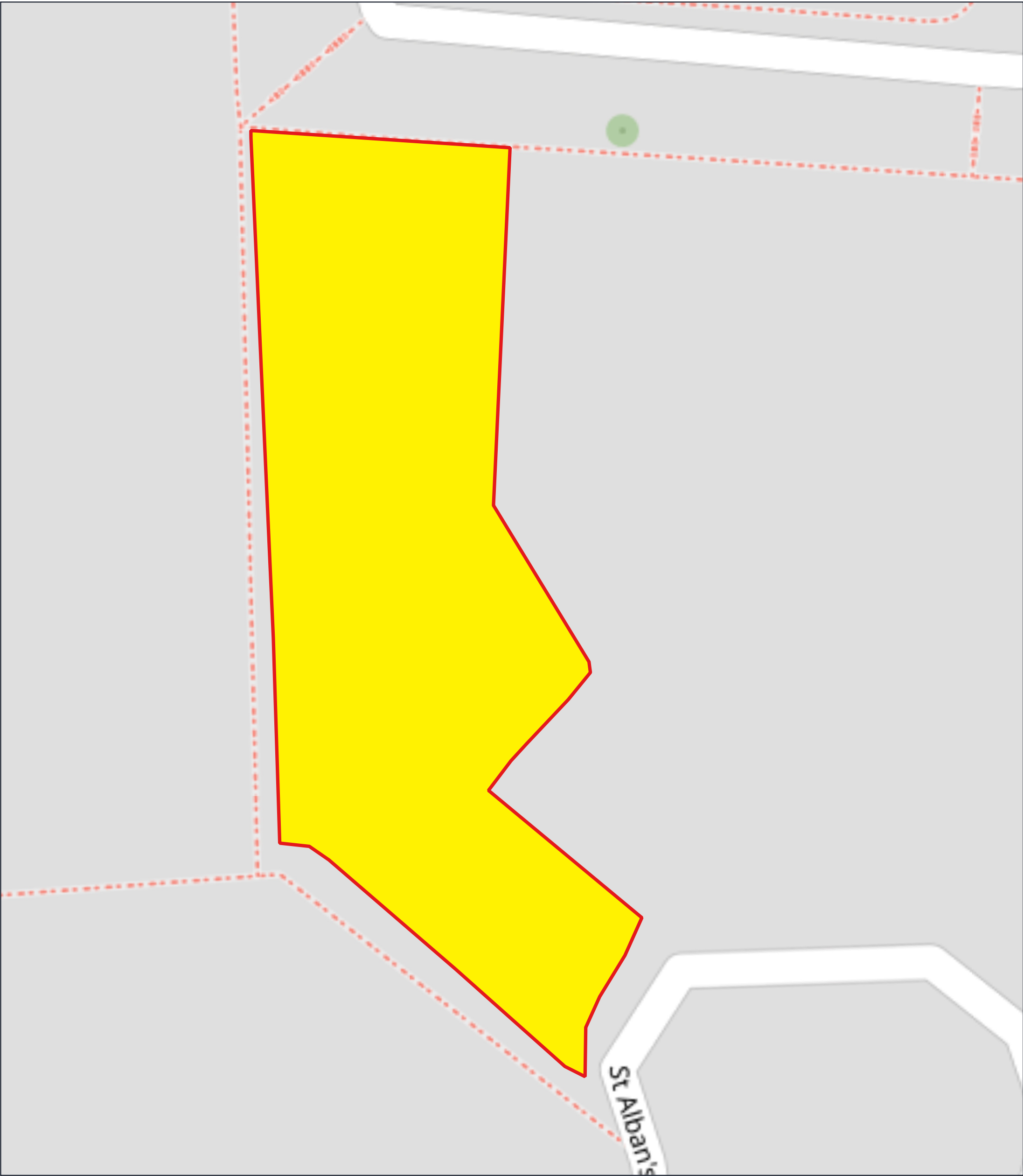


Plans:

Plan 1: Baseline Habitat Features Plan

Plan 2: Post-development Habitats Plan





Project	Land on St Albans Close, Gravesham
Drawing Title	Habitat Features Plan
Scale	Scale: 1:300
Drawing No.	17906/P01
Date	April 2025
Checked	JW/CGS

Legend



Redline boundary

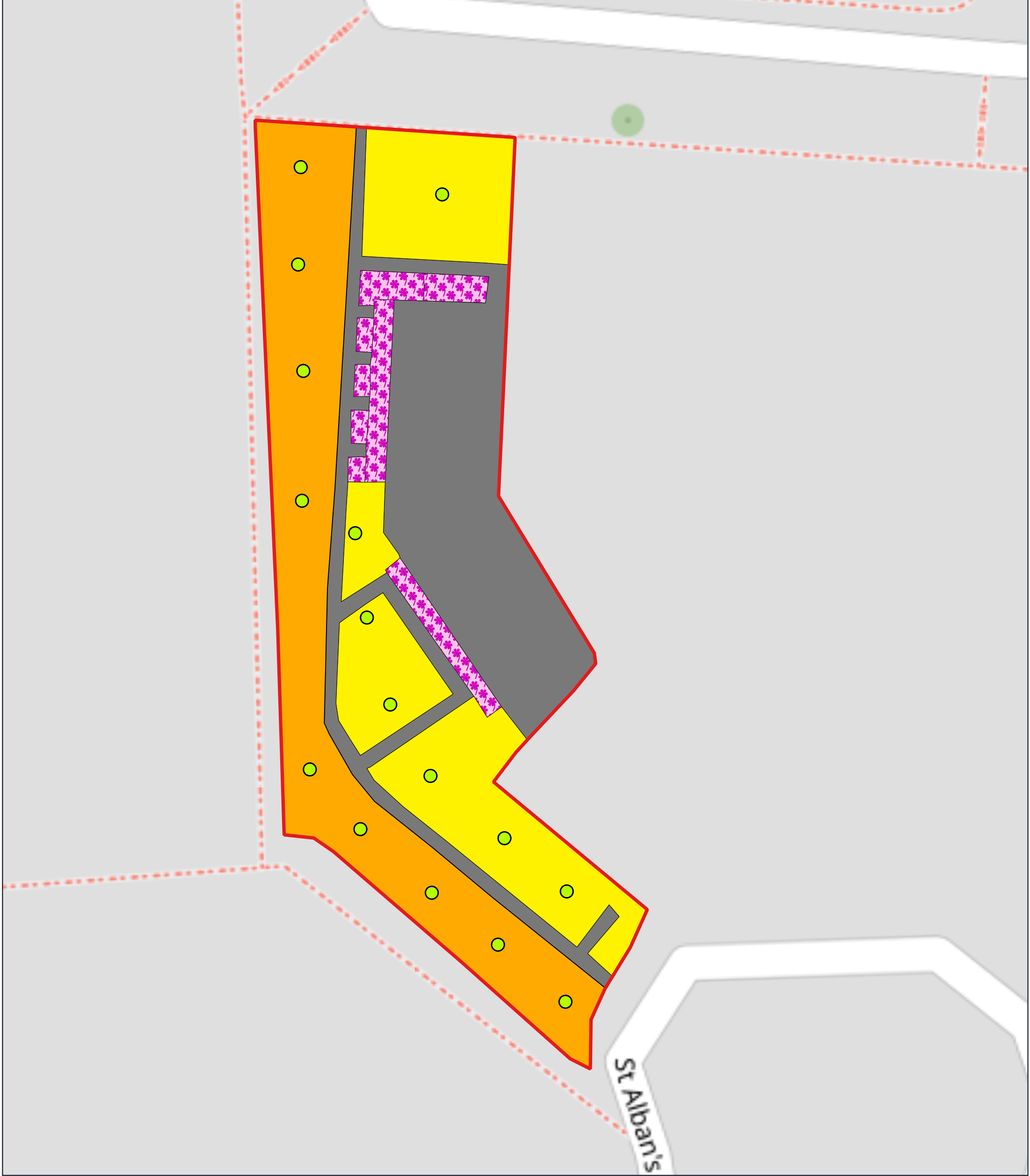
Baseline Habitats



Grassland - Modified grassland



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Grange**



Project	Land on St Albans Close, Gravesham
Drawing Title	Post Development Plan
Scale	Scale: 1:300
Drawing No.	17906/P02
Date	April 2025
Checked	JW/CGS

Legend



Redline boundary

Post Development Habitats



Grassland - Other neutral grassland



Grassland - Modified grassland



Urban - Developed land; sealed surface



Urban - Introduced shrub



Small Tree >7.5cm to 30cm



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