

BIODIVERSITY NET GAIN STATEMENT

PROPOSAL:	Demolition of existing dwelling and erection of 2 x semi-detached 2-bedroom new build dwellings, with associated subdivision of the site and landscaping, with some internal and external alterations and demolitions.
SITE:	No. 22 Goodwood Crescent, Gravesend, Kent DA12 5EL
LOCAL AUTHORITY:	Gravesham Borough Council – Planning Dept., Civic Centre, Windmill Street, Gravesend, Kent, DA12 1AU



No. 22 Goodwood Crescent, Gravesend, Kent DA12 5EL
Existing Aerial View

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- 1.1 This report evaluates the estimated Biodiversity Net Gains / Losses at the proposed development site located at 22 Goodwood Crescent, Gravesend, Kent, DA12 5EL. The proposed development seeks to demolish the existing dwelling and provide 2 x semi-detached 2-bedroom, 3-person dwellings, together with associated subdivision of the site, landscaping, parking and access via new dropped kerbs. Initial investigations demonstrate the following:

Existing structures to be demolished

- I. Existing dwelling footprint = 98m²
- II. Existing hardstanding/driveway = 120m²
- III. Existing developed area (total) = 218m²
- IV. Existing vegetated garden/grass = 256m²

Proposed development

- I. 2 x 2-bedroom, 3-person dwellings (combined footprint) = 102m²
- II. Proposed hardstanding/parking = 121m²
- III. Proposed developed area (total) = 223m²
- IV. Proposed vegetated garden/grass = 251m²

Overall Total Area of developed land = +5m²

Overall Total Area of vegetated garden = -5m²

The development will result in an increase of developed structure and hardstanding of 5m², and a corresponding decrease in vegetated garden habitat of 5m². This puts the development significantly below the 25m² threshold in accordance with *(a)less than 25 square metres of onsite habitat that has biodiversity value greater than zero;* 'Biodiversity Gain Requirements (Exemptions) Regulations 2024' – Regulation 4.

The proposal would result in no 'below baseline' loss of vegetated garden habitat as existing structures on the site will be replaced.

As the site is used as private residential gardens, is already substantially developed, and does not propose to remove any hedge line habitat, the proposal also complies with the requirements set out within *(b)less than 5 metres in length of onsite linear habitat.* 'Biodiversity Gain Requirements (Exemptions) Regulations 2024' – Regulation 4.

Therefore, there will be no requirement for biodiversity enhancements within the site and off-setting will not be required as there will be no shortfall in biodiversity credits.

2.1 PROPOSAL

The proposal is for the demolition of the existing dwelling at 22 Goodwood Crescent and the erection of 2 x semi-detached 2-bedroom, 3-person dwellings, with associated subdivision of the site, landscaping, parking and access via new dropped kerbs to be formed at the front of the site.



Figure 1 - Site Plan @ No. 22 Goodwood Crescent - Gravesend - Kent – DA12 5EL
(Not to Scale)

This report has been prepared with reference to the following plans and proposals:

Proposed Drawings 111 to 114



Figure 2 - Street View of proposal site

2.2 SITE DESCRIPTION

The site is situated on Goodwood Crescent, within the Singlewell area of Gravesend, Kent, within an area primarily characterised by suburban residential development. Goodwood Crescent comprises a variety of dwelling types, including detached, semi-detached and bungalow properties, set within individual plots with private front and rear gardens.

The site consists of an existing single dwelling with associated access, parking and driveway hardstanding, along with a vegetated garden at the rear of the property. There are no hedgerows, trees or other linear habitat features on the site. The central grid reference for the site is [TQ 65213 70961](#), and the total site area is approximately 474m².

2.3 PREVIOUS ECOLOGICAL SURVEYS

No full ecological surveys have been previously undertaken at the site. An on-site visual observation for bat roosting potential has been undertaken and is addressed separately within the Design and Access Statement, given the proposed demolition of the existing dwelling.

2.4 LIMITATIONS

Biodiversity Net Gain (BNG) assessments and any calculations only offer an approximate measure of the actual long-term biodiversity changes that may occur on a site. While the Biodiversity Metric tool quantifies the habitat losses and gains associated with development, it does not account for certain significant outcomes or benefits that cannot be numerically assessed, such as the incorporation of wildlife-friendly habitats in private gardens or the installation of wildlife boxes.

SECTION 3.0 METHODOLOGY

3.1 This report is based on a desk-based assessment and site observation during a site survey conducted on 7th June 2026 of the existing habitats present at 22 Goodwood Crescent. Vegetation and habitat types within the site have been recorded in accordance with UK Habitat Classification Version 2.0.

In line with the Statutory Biodiversity Metric User Guide, only medium, large, and very large trees located within the private garden were included in the baseline assessment. The value of on-site habitats and the post-development proposals were calculated using the Statutory Biodiversity Metric (DEFRA, 2023).

3.2 GOOD PRACTICE PRINCIPALS FOR DEVELOPMENT

Best practices for achieving biodiversity net gain are outlined in *Biodiversity Net Gain: Good Practice Principles for Development*. This report has been prepared with these principles in mind. The key principles are summarised below:

Principle 01	This metric does not change existing biodiversity protections, statutory obligations, or policy requirements. The use of this metric does not override the ecological mitigation hierarchy and other requirements (such as consenting or licensing processes, for example woodlands).
Principle 02	This metric should be used in accordance with established good practice guidance and professional codes.
Principle 03	This metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
Principle 04	Biodiversity units are a proxy for biodiversity and should be treated as relative values.
Principle 05	This metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.
Principle 06	Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
Principle 07	Created and enhanced habitats should seek, where practical and reasonable, to be local to any impact and deliver strategically important outcomes for nature conservation.
Principle 08	The metric does not enforce a minimum habitat size ratio for compensation of losses. However, proposals should aim to: maintain habitat extent (supporting more, bigger, better and more joined up ecological networks) and ensure that proposed or retained habitat parcels are of sufficient size for ecological function.

3.3 MITIGATION HIERARCHY

1 - Avoidance	The site is located in a residential area and involves the construction of a residential house on an area of hardstanding and vegetated garden. Therefore, the site selection has avoided a detrimental impact on habitats of significant ecological value.
2 - Mitigation	No habitats of significance are present within the site.
3 - Compensation	No habitats of significance are present within the site.
4 - Enhancement	Greenspaces within the site will form private gardens, as such cannot be secured, therefore enhancements in relation to Biodiversity Net Gain is not possible. Ecological enhancements not numerically assessed have been recommended within this report to enhance the site. See Section 6 for details.

4.1 BASELINE HABITATS

Existing & Proposed plans illustrating the baseline and proposed habitats has been provided within the Appendix. The site is currently dominated by the existing dwelling, driveway hardstanding, and a vegetated rear garden.

<u>Habitat Type</u>	<u>Area (m2)</u>	<u>Condition</u>	<u>Notes</u>
Developed land; Sealed Surfaces	218 (0.0223 ha)	N/A	Includes existing dwelling footprint (98m ²) and driveway hardstanding (120m ²)
Vegetated Gardens	256 (0.0251 ha)	N/A	Private residential garden/grass area within the site. No hedges, trees or other linear habitat features present
TOTAL	474 (0.0474 ha)		

4.2 PROPOSED HABITATS

The proposed development will result in a minimal increase of sealed surfaces within the site due to the construction of 2 replacement dwellings and associated parking arrangements. The site will retain the majority of its vegetated garden habitat, now subdivided to provide a private garden for each of the 2 new dwellings.

<u>Habitat Type</u>	<u>Area (m2)</u>	<u>Condition</u>	<u>Notes</u>
Developed land; Sealed Surfaces	223 (0.0223 ha)	N/A	Includes combined footprint of 2 proposed dwellings (102m ²) and proposed hardstanding/parking (121m ²)
Vegetated Gardens	251 (0.0251 ha)	N/A	Private residential garden areas within the site, subdivided between the 2 proposed dwellings.
TOTAL	474 (0.0474 ha)		

- 5.1 The proposed development is expected to result in a minimal reduction in habitat units due to changes in land use. The current baseline habitat units, derived from the existing vegetated garden, amount to 0.0256 habitat units. The development will result in a 5m² (0.0005 ha) decrease in vegetated garden, leading to an approximate loss of 0.0005 habitat units. This reduction represents a -1.95% net change in habitat units from the existing baseline. It should be noted that the remaining habitat, once subdivided, will continue to comprise ordinary amenity garden of the same general character.

<u>Total Net Unit Change</u>	Habitat units	- 0.005
Including all on-site & off-site habitat retention, creation and improvement	Hedgerow Units	0.00
	Watercourse Units	0.00
<u>Total Net % Change</u>	Habitat units	- 1.95%
Including all on-site & off-site habitat retention, creation and improvement	Hedgerow Units	0.00
	Watercourse Units	0.00

- 5.2 The host dwelling currently benefits from a substantial and over-generous level of amenity relative to policy minimums. The subdivision of the site to provide 2 dwellings, each with their own private garden of 119m² and 121m² respectively, substantially exceeds Gravesham's minimum garden area requirement of 37.2m² per dwelling.
- 5.3 The rear garden space of each proposed dwelling is equivalent to, or exceeds, other properties in the area and surpasses both the Council's Residential Layout Guidelines and London Plan (2021) space standards. Therefore, it is considered that the subdivision would be reasonable and not harmful to the existing biodiversity and existing vegetated garden habitat. The tables above confirm the minimal loss of existing green habitat amenity, amounting to only 5m² (-1.95%).
- 5.4 The scale of green habitat amenity, for both proposed dwellings, has been designed to be proportional to the wider street and to conserve and protect as much of the existing garden as reasonably possible, whilst accommodating the erection of 2 dwellings in place of 1.
- 5.5 **Biodiversity Net Gain**
No mandatory Biodiversity Net Gain is required as the proposal is below the 25m² threshold set out within the Biodiversity Gain Requirements (Exemptions) Regulations 2024, Regulation 4(a). The proposal also does not remove any hedgerow or other linear habitat feature, satisfying Regulation 4(b).

6.0 Wherever feasible, ecological enhancements should be integrated into the proposed development and landscape design. While the enhancements outlined below are not factored into the DEFRA Metric, they can offer various benefits to local wildlife.

6.1 General Bird Boxes

Installing bird boxes on the site increases nesting opportunities for various bird species. These boxes can be incorporated into the new structures or mounted on mature trees within the area. They should be installed at a height of over 2 meters, in locations that are sheltered from disturbance and prevailing winds. Examples of suitable models are shown below.



6.2 Sparrow Terraces

Sparrow terraces offer multiple nesting sites and can be either integrated into the building structure or wall-mounted. Ideally, these boxes should be placed between 2 and 5 meters above ground, avoiding interference and exposure to prevailing winds. A recommended model is displayed below.

(Above – Sparrow Terraces)



(Below – Hedgehogs)



6.3 Hedgehogs

Hedgehogs are experiencing significant population declines across the UK. The proposed landscaping will create habitats suitable for hedgehogs, and further enhancements can be made by placing hedgehog domes within dense vegetation on the site, away from disturbances. These domes provide ideal shelters for breeding and hibernation. A suggested model is shown below. Additional measures, such as creating gaps or installing purpose-built hedgehog gates, can facilitate movement between gardens. During site clearance, consider chipping or composting vegetation for reuse in new habitats, or creating brash piles on the site's periphery to support hedgehog habitats.

6.4 Invertebrate Boxes

To create additional habitats for invertebrates to shelter, overwinter, or nest, invertebrate boxes can be installed in sunny, suitable locations on the site. It is advisable to position these boxes away from bird boxes. Recommended models are shown below.



6.5 Bat Boxes

To provide roosting opportunities for bats, bat boxes should be installed on the site. These can be integrated into the new structures or mounted on mature trees. The boxes should be placed at least 3 meters above the ground, away from dense vegetation and artificial light, with a preference for south or east-facing locations. Suggested models are shown below.



6.6 Wildlife-Friendly Garden Planting

Enhancing the site for bats and other wildlife can be achieved through wildlife-friendly garden planting. Selecting plant species with varied flowering periods, including night-flowering varieties, will help attract night-flying invertebrates and maximize ecological value.

- Sweet Williams (*Dianthus barbatus*)
- Wood Forget-me-not (*Myosotis sylvatica*)
- Oxeye Daisy (*Leucanthemum vulgare*): A tall, white-petaled daisy that attracts bees and butterflies.
- Red Campion (*Silene dioica*): Produces pink flowers that are attractive to moths and bees.
- Meadow Cranesbill (*Geranium pratense*): A hardy plant with blue or violet flowers that are loved by bees.
- Common Knapweed (*Centaurea nigra*): A robust wildflower with purple blooms that provide nectar for a range of pollinators.
- Field Scabious (*Knautia arvensis*): Known for its pale lilac flowers, it's highly attractive to bees and butterflies.
- Red Valerian (*Centranthus ruber*)

6.7 Shrubs:

- Hawthorn (*Crataegus monogyna*): Produces clusters of white flowers in spring and red berries in autumn, providing food for birds and shelter for insects.
- Guelder Rose (*Viburnum opulus*): Offers white flowers in summer and red berries in autumn, attracting birds and pollinators.
- Honeysuckle (*Lonicera periclymenum*): A climbing shrub with fragrant flowers that attract moths, which in turn attract bats.

6.8 Herbaceous Plants:

- Lavender (*Lavandula angustifolia*): Its fragrant purple flowers are a magnet for bees and butterflies.
- Foxglove (*Digitalis purpurea*): Tall spikes of purple flowers that are particularly attractive to bees.
- Evening Primrose (*Oenothera biennis*): A yellow-flowered plant that opens in the evening, attracting night-flying moths.

6.9 Trees:

- Rowan (*Sorbus aucuparia*): Produces white flowers in spring and red berries in autumn, providing food for birds and insects.
- Silver Birch (*Betula pendula*): A native tree that supports a wide range of insects and birds.

6.10 Grasses:

- Tufted Hairgrass (*Deschampsia cespitosa*): A dense, tufted grass that provides habitat for insects and seeds for birds.
- Yorkshire Fog (*Holcus lanatus*): A soft, silvery grass that offers cover and food for wildlife.

6.11 Night-Flowering Plants:

- Night-Scented Stock (*Matthiola longipetala*): Releases a strong fragrance in the evening, attracting night-flying insects.
- Jasmine (*Jasminum officinale*): This climbing plant's white flowers are particularly fragrant at night and attract moths.

- 7.1 The proposal will result in a minimal decrease in the existing vegetated garden, equal to -1.95%.
- 7.2 The proposed development will result in a minimal increase of sealed surfaces (5m²) within the site due to the demolition of the existing dwelling and construction of 2 replacement dwellings and associated parking. The site will retain the substantial majority of its vegetated garden habitat.
- 7.3 The development will result in a net increase of 5m² of developed land, well below the 25m² threshold set out within (a) less than 25 square metres of onsite habitat that has biodiversity value greater than zero; 'Biodiversity Gain Requirements (Exemptions) Regulations 2024' – Regulation 4.
- 7.4 The proposal would result in no 'below baseline' loss of any hedgerow, tree or other linear habitat feature, as none are present on the site.
- 7.5 As the site is used as private gardens and does not propose to remove any hedge line habitat, the proposal also complies with the requirements set out within (b) less than 5 metres in length of onsite linear habitat. 'Biodiversity Gain Requirements (Exemptions) Regulations 2024' – Regulation 4.
- 7.6 Therefore, there will be no requirement for biodiversity enhancements within the site and off-setting will not be required as there will be no shortfall in biodiversity credits.
- 7.7 The proposed scheme is in accordance with the 'Biodiversity Gain Requirements (Exemptions) Regulations 2024' – Regulation 4 and is therefore in favour of the proposal being granted an exemption from mandatory Biodiversity Net Gain requirements.

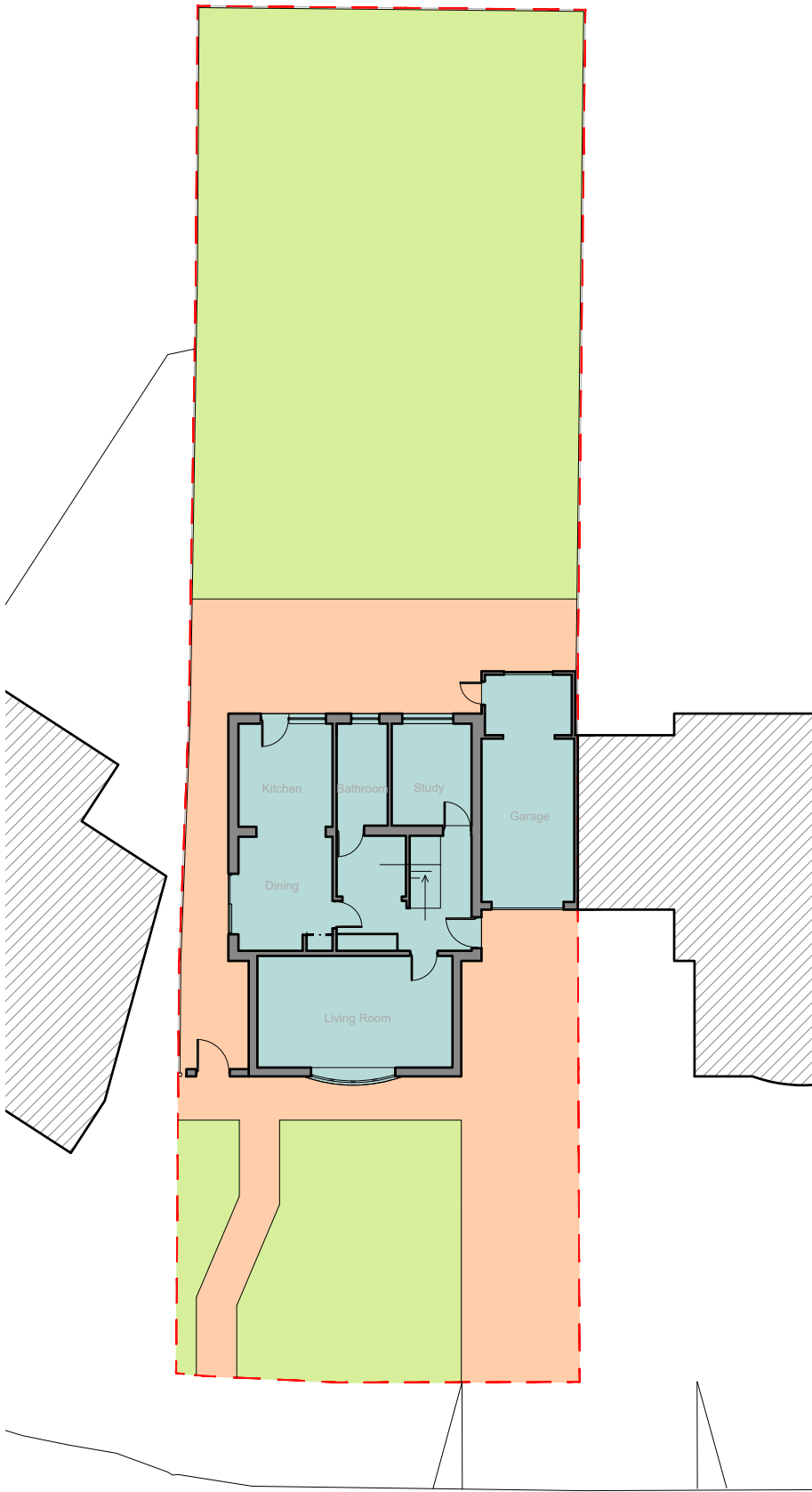
8.0 We append the following drawings and scheme proposals to this statement which should be read in conjunction:

BNG-01 - Biodiversity Net Gain Assessment Plans

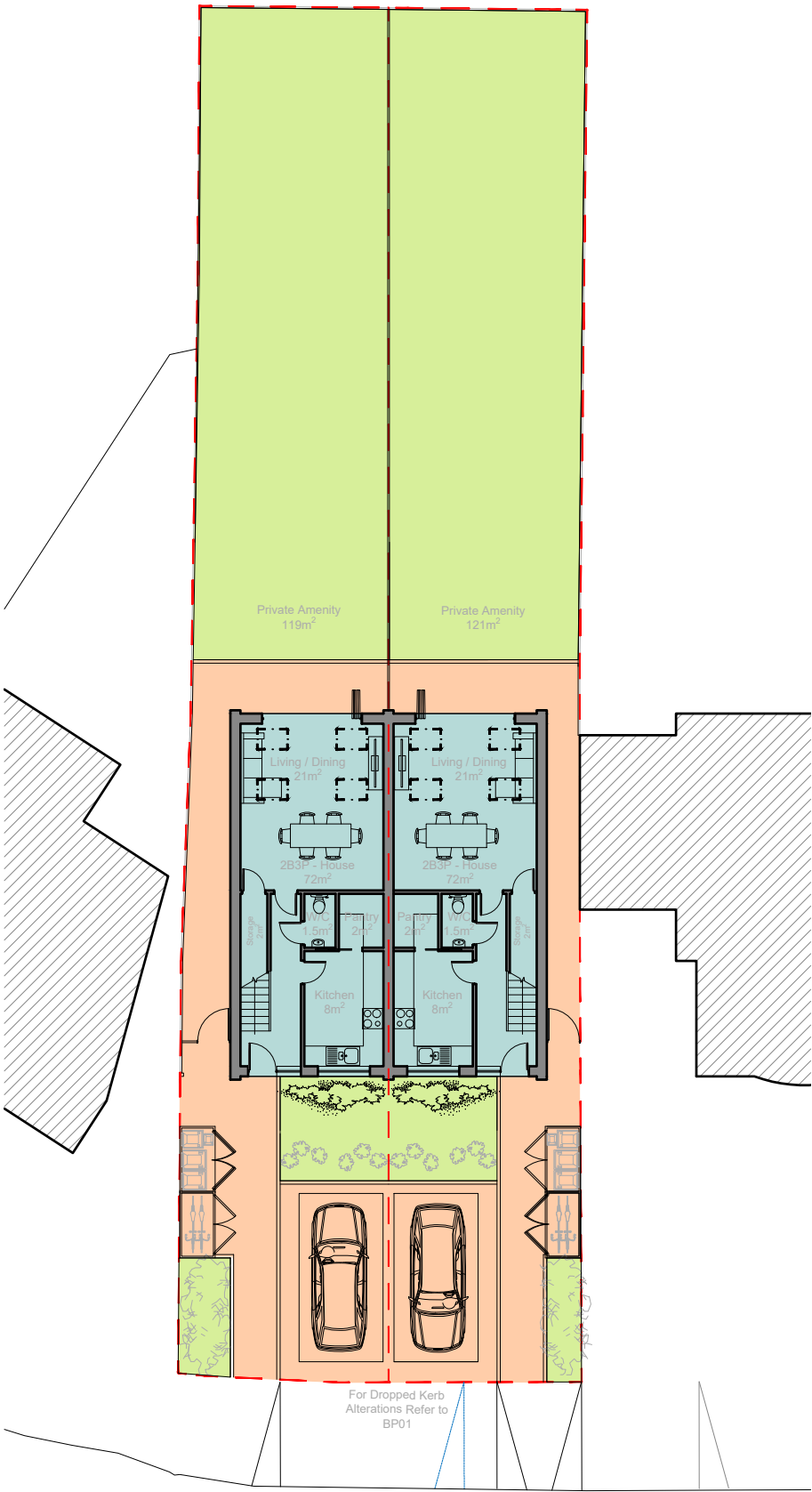
NOT FOR CONSTRUCTION

SUBJECT TO SPECIALIST SURVEYS

No Encroachment of Boundaries by the Eaves,
Foundation or Gutters



EXISTING - SITE PLAN



PROPOSED - SITE PLAN

KEY		EXISTING AREA (M²)	PROPOSED AREA (M²)
- - -	SITE BOUNDARY	474M²	474M²
■	VEGETATED AREA	256M²	251M²
■	DEVELOPED LAND	98M²	102M²
■	HARD LANDSCAPING	120M²	121M²

22 GOODWOOD CRESCENT

GRAVESEND, KENT, DA12 5EL

SCALE 1:100

0 1 2 3 4 5

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Title: BIODIVERSITY NET GAIN ASSESSMENT PLANS	
Scale: 1:100 @ A3	Date: 31.07.2026
Drawing No.: BNG - 01	Revision: