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BIODIVERSITY NET GAIN ASSESSMENT: FEASIBILITY STAGE

LAND AT PARKER FARM

ASHFORD, KENT

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Report status	Information
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1. SUMMARY

RESULTS

S.1 The biodiversity net gain feasibility assessment shows that current development proposals result in a **66.45% loss** in the biodiversity value of habitat units and a **169.77% gai**n in the biodiversity value of hedgerow units. No watercourse units are present or proposed.

S.2 An additional 1.71 biodiversity units are required to achieve 10% net gain.

S.3 According to the habitat trading rules, proposals result in a deficit of other neutral grassland (0.59 units), bramble scrub (0.03 units) and urban trees (0.05 units).

S.4 The proposals include the loss of grassland and urban areas for the creation of residential dwellings with associated gardens, while retaining Hedgerow (H1). Additionally, a new hedgerow will be planted around the parking area at the entrance, and two urban trees will be added.

RECOMMENDATIONS

S.5 The following measures should be considered to reduce the loss of other neutral grassland and bramble scrub within the Site:

- Amending proposals to include retention of larger areas of grassland and scrub habitats within the Site.
- Creation of additional areas of other neutral grassland within proposals.
- Creation of additional urban trees.
- Enhancement of modified grassland around the boundaries.

S.6 Given the deficit of other neutral grassland, it is unlikely that net gain can be achieved entirely on Site without significant reduction in the scale of proposed development. The creation/enhancement of habitat on off-site land could therefore be considered. Suitable sites should have a low baseline biodiversity unit value, such as cropland or modified grassland, and lie within the same LPA/NCA as the development site. The area of land required for off-site compensation is dependent on the extent to which measures can be implemented on-site, the off-site baseline habitat and location and the creation / enhancement habitats proposed.

S.7 Should net gain not be achievable through on-site or off-site habitat creation and enhancement, the purchase of units from a 3rd party supplier, or statutory credits, can provide compensation to achieve an overall 10% gain.

Next steps

S.8 Section 16 provides an overview of the next steps of the Biodiversity Net Gain process.

2. INTRODUCTION

2.1 This report details a Biodiversity Net Gain Feasibility Assessment undertaken in respect of proposed development at Land at Parker Farm, Hamstreet, Ashford, Kent, TN26 2JQ.

Table 1. Site Location

Site address	Land at Parker Farm, Hamstreet, Ashford, Kent, TN26 2JQ
Grid reference (at centre)	TQ 99982 33161
Local Planning Authority	Ashford LPA
County	Kent
National Character Area	Low Weald, Romney Marsh
Biodiversity Opportunity Area	N/a

COMMISSION

2.3 Native Ecology was commissioned by Clarus Solutions Ltd. in September 2024 to undertake a Biodiversity Net Gain Feasibility Assessment of the Site to include baseline calculations and change in biodiversity value.

APPLICATION SITE

2.4 The application site, hereafter referred to as "the Site", comprises of disused cattle buildings, areas of grassland, and scrub. The Site extends to 0.63ha.

PROPOSED WORKS

2.5 The development proposals for the Site comprise the construction of eight residential dwellings with associated access, parking and gardens.

BIODIVERSITY TARGET

2.6 Schedule 14 of the Environment Act 2021 makes provision for a biodiversity gain of at least 10% to be a condition of planning permission in England. This is supported by Ashford Borough Council (Ashford Borough Council, 2024).

PURPOSE OF REPORT

2.7 The objectives of the report are to:

- Detail the baseline habitats present within the Site.
- Undertake a desk study to inform recommendations for habitat enhancement and creation.
- Measure and map the habitats present within the Site.
- Present the baseline biodiversity units.
- Provide an estimate of the post-development units.
- Provide a summary of the overall net gain assessment calculations.
- Provide recommendations to achieve net gain based on appropriate good practice principles.

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Site location plan

Land at Parker Farm
Hamstreet, Ashford
Kent

Figure ref:	1708_Figure 1
Revision:	-
Date:	16/12/2024
Scale:	1:20000 (Main canvas)
Paper size:	A3

4. EXISTING SITE PLAN

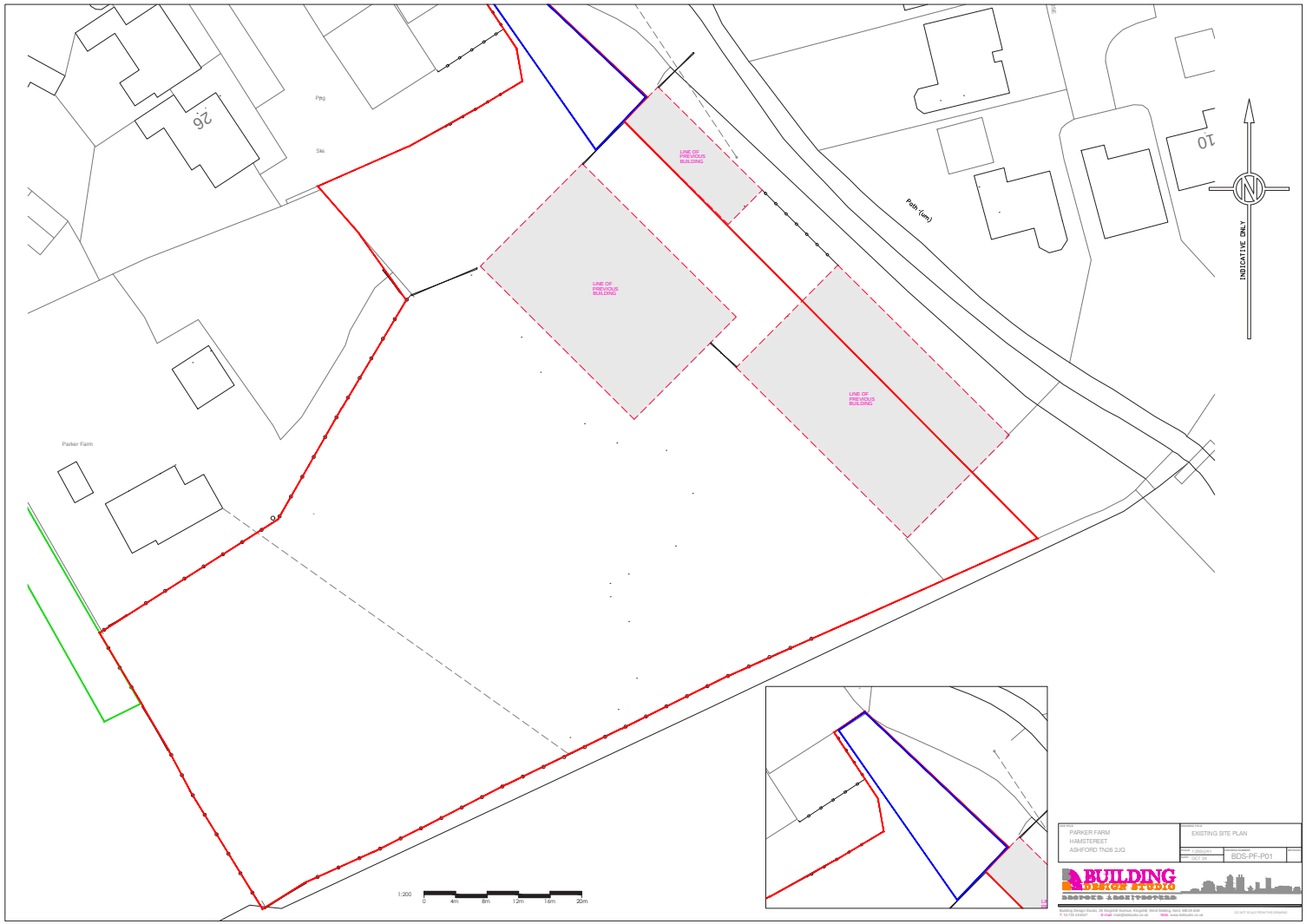
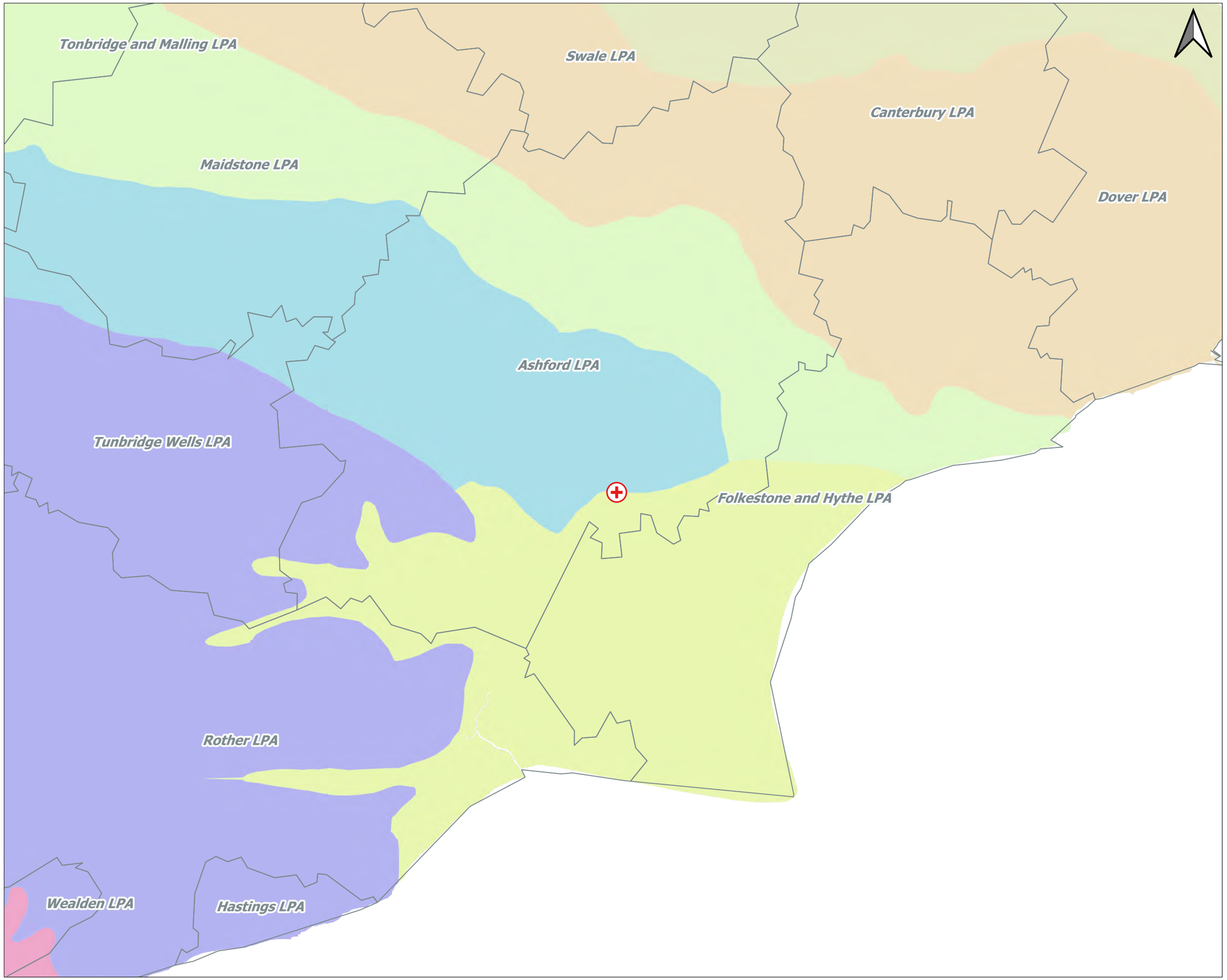


Figure 2. Existing Site Plan (Building Design Studio, Drawing number BDS-PF-P01, Dated Oct'24.



Legend

- Site Location
- LPA
- High Weald
- Low Weald
- North Downs
- North Kent Plain
- Pevensey Levels
- Romney Marshes
- Wealden Greensand

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LPA and NCA Plan

Land at Parker Farm
Hamstreet, Ashford

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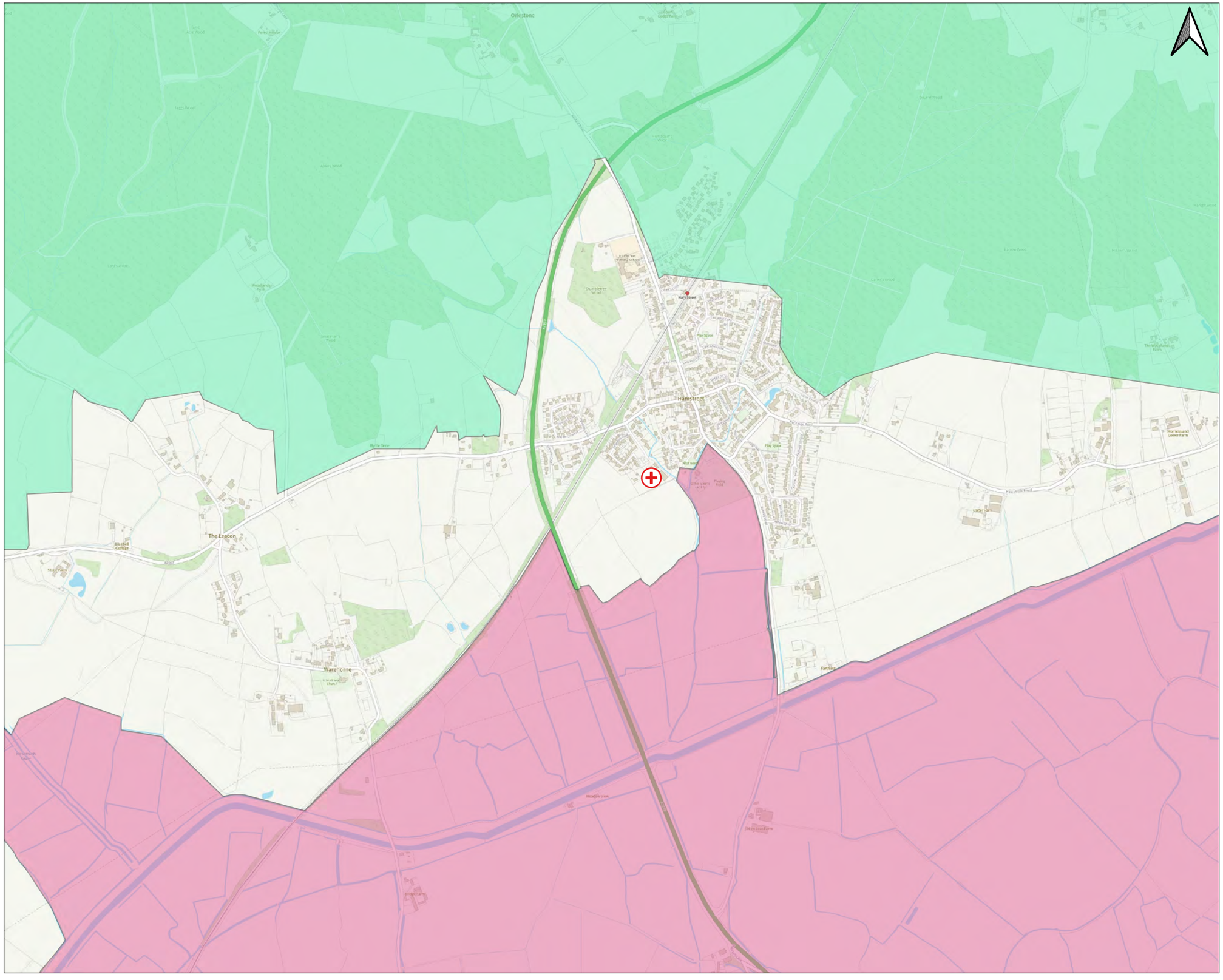
Paper size:	A3



Legend

- Site Location
- Low Weald Woodland
- Romney Marshes

0 1,000 2,000 m

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Biodiversity Opportunity Area Plan

Land at Parker Farm
Hamstreet, Ashford
Kent

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7. METHODOLOGY

HABITAT CONDITION ASSESSMENT

7.1 A Preliminary Ecological Appraisal (Native Ecology, 2024, report reference 1708_R01) and Baseline Habitat Condition Assessment (Native Ecology, 2024, report reference 1708_R02) are used to inform the baseline calculations within this report.

DESK STUDY

7.2 The following resources were used to provide recommendations for habitat creation within the Site, and to inform the assignment of strategic significance:

- Preliminary Ecological Appraisal report (Native Ecology, 2024)
- Summary of Interim Strategic Significance Guidance for Biodiversity Net Gain in Kent and Medway (Kent County Council, 2024)
- The Kent Biodiversity Strategy (Kent Nature Partnership, 2020)
- Natural England Habitat Network Maps
- Kent Landscape Information Service (KLIS) habitat opportunities tool
- British Geological Survey Geology Viewer
- Magic Map Application

STATUTORY BIODIVERSITY METRIC

7.3 The Biodiversity Metric calculation tool provides a way to measure the biodiversity value of a site and subsequent losses and gains as a result of development proposals. It is used to inform and guide development plans and decisions on achieving biodiversity net gain within a project.

7.4 The Metric uses habitat type as a proxy for the relative biodiversity value of a site. The on-site habitats are converted into measurable biodiversity units, which then provide the basis of the calculations.

Calculating the baseline biodiversity units

7.5 To calculate the change in biodiversity unit value of the Site resulting from the proposed development, the baseline biodiversity value of the Site was first calculated. The output of the Statutory Metric tool gives the existing biodiversity unit value of the Site.

Condition

7.6 The calculations within this assessment have been carried out using an assessment of habitat condition undertaken on 12/09/2024. Full details can be found within the Habitat Condition Assessment Report (Native Ecology, 2024, report reference 1708_R02).

7.7 There were no limitations to this assessment.

Habitat distinctiveness

7.8 Each habitat type (based on the UKHab classification) is pre-assigned a 'distinctiveness' score by the Metric.

Strategic significance

7.9 Each habitat parcel was assigned a level of strategic significance and given a score based on whether it is located within an area that is locally significant for that habitat type.

Calculating the post-construction biodiversity units and net change

7.10 The calculation was then repeated for post-development. Appropriate figures, based on the current proposals, for habitat retention, creation and enhancement were input into the Statutory Metric tool.

7.11 The Metric measures predicted changes in biodiversity value and includes additional influences to account for risks associated with habitat creation and enhancement. Three risk factors are incorporated into the Metric tool:

- Difficulty of creating or restoring a habitat.
- Temporal risk - The time it takes for habitat to reach required condition. The risk can be minimised by reducing the delay between site clearance and habitat creation.
- Spatial risk - The location of any off-site mitigation. Off-site mitigation outside the LPA/NCA boundary carries a higher risk than mitigation within the same LPA/NCA as the development site.

7.12 When all data is input, The Statutory Metric tool provides a summary of the net change in biodiversity unit value for habitats, hedgerows and watercourses.

ASSESSMENT DOCUMENTS

7.13 The biodiversity net gain assessment calculations are based on the following post-development layout:

- Site Layout Plan (Building Design Studio, Drawing No.BDS-PF-P02 dated October 2024)

ASSUMPTIONS

7.14 The feasibility calculations are based on the following assumptions:

- The Site Plan (Building Design Studio, 2024) does not contain detailed landscaping information and therefore assumptions have been made about the proposed habitat creation measures (see Section 10 for details).
- Habitat creation measures have been assigned target conditions that are considered to be achievable within 30 years and in the context of the development.
- There will be a 1 year delay between habitat loss and creation.
- Habitat creation will be managed appropriately and replaced as required.
- All off-site habitats will be retained and protected during works.

7.15 Appendix 1 provides a table of relevant habitat definitions with recommendations for maximising the achievable condition.

8. BASELINE ASSESSMENT

IRREPLACEABLE HABITATS

8.1 No irreplaceable habitats are present within the Site.

OTHER HABITATS

8.2 Table 2 provides a summary of habitats present within the Site and their baseline value. A Baseline habitat plan is provided in Section 9.

Table 2. Summary of baseline habitats present within the Site

	Habitat	Condition	Strategic significance	Area/length	Unit value
Habitat units	Developed land; sealed surface	N/A - Other	Low	0.162 ha	0.00
	Bare ground	Poor	Low	0.015 ha	0.03
	Bramble scrub	Condition Assessment N/A	Low	0.008 ha	0.03
	Modified grassland	Poor	Low	0.01 ha	0.02
	Modified grassland	Moderate	Low	0.372 ha	1.49
	Other neutral grassland	Moderate	Medium	0.055 ha	0.48
	Other neutral grassland	Good	Medium	0.008 ha	0.11
	Urban tree	Moderate	Medium	0.0081 ha	0.07
				Total	**2.23**
Hedgerow Units	Native hedgerow	Moderate	Low	0.016 km	0.07
				Total	**0.07**

Legend

- Application site boundary
- Small tree
- Native hedgerow
- Bare ground
- Bramble scrub
- Developed land; sealed surface
- Modified grassland
- Other neutral grassland

Note:

Habitats mapped based on UK Habitat Classification following habitat condition assessment site visit undertaken on 12/09/2024.

Numbers refer to area parcel references. 'H' numbers refer to hedgerow.

Habitat Condition
* poor habitat condition
** moderate habitat conition
*** good habitat condition
n/a condition assessment not applicable

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Biodiversity Net Gain
Baseline Habitat Plan

Land at Parker Farm
Hamstreet, Ashford
Kent

Figure ref:	1708_Figure 5
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Date:	16/12/2024
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Paper size:	A3

10. PROPOSED DESIGN

PROPOSALS

10.1 The proposals include the construction of eight detached and semi detached residential properties with associated parking, access and gardens.

10.2 The Indicative Site and Roof Plan (Building Design Studio 2024) does not contain detailed landscaping information and therefore assumptions have been made about the proposed habitat retention and creation measures:

- The hedgerow in the south east corner (Plot 8) will be retained. All other habitats will be lost.
- Areas of grassland close to the proposed units, which are likely to be subject to a high level of footfall, will comprise modified grassland.

10.3 Table 3 provides an overview of the habitat retention, enhancement and creation measures that will be undertaken within the Site. A post-development habitat plan is provided in Section 12.

10.4 Appendix 1 provides relevant habitat definitions with recommendations for achieving the proposed target condition.

Table 3. Summary of proposed habitat retention, creation and enhancement

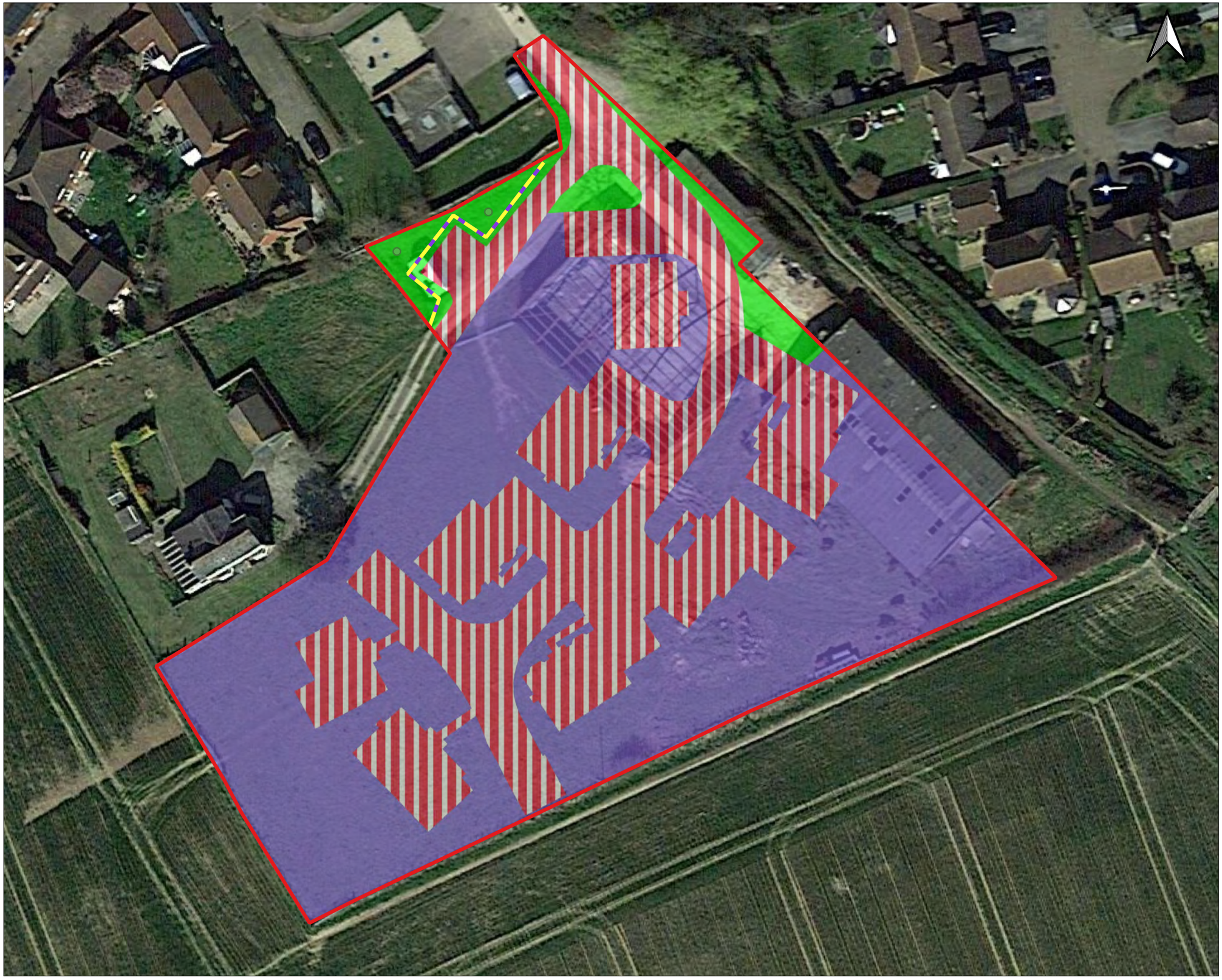
	Habitat	Intervention	Description	Condition	Strategic significance	Area / length	Units Delivered
Habitat Units	Developed land, sealed surface	Creation	8no. dwellings will be constructed with associated access, parking and other areas of hardstanding.	N/a	Low	0.24 ha	0.00
	Vegetated garden		Dwellings will have associated vegetated gardens.	N/a	Low	0.355 ha	0.66
	Modified grassland		Areas of modified grassland will be created in public spaces with high foot fall, for example road verges.	Poor	Low	0.034 ha	0.06
	Urban tree		38no. small trees will be planted in public spaces.	Moderate	Low	0.0081 ha	0.02
						Total	0.75*

	Habitat	Intervention	Description	Condition	Strategic significance	Area / length	Units Delivered
Hedgerow units	Native hedgerow	Retention	H1 will be retained by proposals.	Moderate	Low	0.016 km	0.07
		Creation	1no. native hedgerow will be created around the boundary of the parking area, at the entrance to the Site.	Moderate	Low	0.037 km	0.12
						Total	0.19

*Rounded to adhere to Statutory Metric calculations.

11. PROPOSED SITE LAYOUT

Figure 6. Site Layout Plan (Building Design Studio, Drawing No. BDS-PF-P02 dated October 2024).



Legend

- Application site boundary
- Small tree
- Native hedgerow
- Developed land; sealed surface
- Modified grassland
- Vegetated garden

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Biodiversity Net Gain
Post Development Habitat Plan

Land at Parker Farm
Hamstreet, Ashford
Kent

Figure ref:	1708_Figure 7
Revision:	-
Date:	16/12/2024
Scale:	1:500
Paper size:	A3

13. METRIC RESULTS

13.1 Full results of the baseline and post-development biodiversity unit calculations are provided with the accompanying Statutory Biodiversity Metric Calculation Tool (Native Ecology, 2024c), which supports this assessment.

HEADLINE RESULTS

13.2 The biodiversity net gain feasibility assessment shows that current development proposals result in a **66.45% loss** in the biodiversity value of the area habitats and a **169.77% gain** in the biodiversity value of the hedgerow habitats within the Site. No watercourses are present or proposed.

13.3 Table 4 shows the overall results of the feasibility assessment.

Table 4. Overall change in biodiversity units

	Baseline units	Post development units	Net Change: Units	Net change: %	Additional Units required
Habitat units	2.23	0.75	-1.48	-66.45%	1.71
Hedgerow units	0.07	0.19	+0.12	+169.77%	0.00

TRADING SUMMARY RESULTS

13.5 The trading summary results show that the habitat trading rules have not been met for loss of the following medium distinctiveness habitats:

- Other neutral grassland (0.59 unit deficit)
- Bramble scrub (0.03 unit deficit)
- Urban tree (0.05 unit deficit)

13.6 To achieve biodiversity net gain, loss of habitats of medium must be offset with habitat creation of the same broad habitat type (e.g. grassland, woodland etc.) or a habitat of higher distinctiveness.

14. DESK STUDY

14.1 In accordance with Principle 6 of Biodiversity Net Gain (set out within guidance from CIEEM, CIRIA and IEMA), proposed habitat creation should "use robust and credible evidence that is underpinned by local knowledge of biodiversity priorities when making decisions about appropriate habitats to enhance and create."

14.2 Therefore, to inform recommendations for habitat creation and enhancement (provided in Section 15), a desk study was undertaken to investigate the local and landscape priorities.

Strategic habitat creation

14.3 Table 5 provides a summary of habitats that could be created within the Site to provide beneficial outcomes for biodiversity at a landscape or local scale based on the results of the desk study.

Table 5. Summary of potentially beneficial habitat creation measures

Habitat	Scale	Reason	Supporting documents
Other neutral grassland	Landscape	According to the BGS Geology Viewer, the Site is positioned within the Romney Marshes and Rye Bay BOA, and within a Natural England Network Medium Zone for other neutral grassland, supporting the potential for this habitat creation.	National Habitat Network Maps (Natural England, 2020), Kent Biodiversity Strategy (Kent Nature Partnership, 2020) and Summary of Interim Strategic Significance Guidance for Biodiversity Net Gain in Kent and Medway (Kent County Council, 2024)
Traditional orchard	Landscape	Traditional orchard is a priority Habitat within the Kent Biodiversity Strategy, and is identified as a habitat of high strategic significance across Kent and Medway. The existing habitat (good condition other neutral grassland) would support the creation of traditional orchard within the Site.	Kent Biodiversity Strategy (Kent Nature Partnership, 2020) and Summary of Interim Strategic Significance Guidance for Biodiversity Net Gain in Kent and Medway (Kent County Council, 2024)
Hedgerow	Local/ Landscape	The creation and enhancement of native-species rich hedgerows, a priority habitat within the Kent Biodiversity Strategy, would improve opportunities for nesting birds and increase connectivity through the Site for a variety of wildlife.	Kent Biodiversity Strategy (Kent Nature Partnership, 2020) and Preliminary Ecological Appraisal Report (Native Ecology., 2024)
Tree planting	Local	The planting of native trees will benefit foraging bats and birds, among other species.	

15. RECOMMENDATIONS

THE MITIGATION HIERARCHY

15.1 A process should be adopted within the design stage of the project to avoid, mitigate and compensate for potential negative ecological impacts, this process is known as the 'mitigation hierarchy'.

15.2 Negative ecological impacts should be avoided wherever possible by making amendments to the proposed layout. Where avoidance is not possible, mitigation to reduce the impact should be considered, for example through the creation or enhancement of habitats either on or off-site.

15.3 Avoidance and mitigation is most effective when considered as early as possible within a scheme, allowing for measures to be integrated into the design, an appropriate timeline to be developed and for alternatives to be considered.

Avoidance

15.4 In the biodiversity net gain process, avoidance should be considered first. Ecologically valuable habitats, including those of high distinctiveness and strategic importance, should be retained wherever possible.

Mitigation

15.5 When avoidance measures have been considered, mitigation measures can then be implemented to make up any unit deficits. This will include habitat creation and enhancement measures. On-site measures should be considered first, but off-site mitigation can also be undertaken and included within the net gain metric.

15.6 Mitigation measures must address unit deficits within the trading summary rules in addition to any units needed to meet the required overall gain. In this instance, 1.70 units are required to make a 10% gain, but this must include appropriate habitat measures to address the 0.59 unit deficit of other neutral grassland, 0.03 unit deficit of bramble scrub and 0.04 unit deficit of urban trees.

Compensation

15.7 Should mitigation measures not be sufficient to achieve net gain, compensation in the form of the purchase of units or statutory credits can be considered. The purchase of units from a 3rd party seller must be considered first. Should no units be available, statutory credits can be purchased. Statutory credits are intended to be used as a last resort option, and this is reflected in the cost. A minimum of 3no. 3rd party sellers must be approached before statutory credits can be used.

RISK REDUCTION

Temporal risks

15.8 Enhancement and creation of habitats in advance of construction works can increase the number of biodiversity units generated from the same area. Therefore, early consideration should be given to habitat enhancement and creation measures to ensure that they are brought forward as early in the construction schedule as possible.

Spatial risks

15.9 The location of mitigation and compensation has an impact on the number of biodiversity units generated. On-site mitigation is the most valuable. When considering off-site mitigation and compensation, habitat measures undertaken within the LPA/NCA boundary are considerably more valuable than measures undertaken outside these areas. If mitigation / compensation within the LPA/NCA boundary is not possible, the neighbouring LPA/NCAs are more valuable than measures undertaken further afield. Therefore, when selecting sites for off-site mitigation, or when purchasing from a 3rd party seller, the site location should be carefully considered.

RECOMMENDATIONS

15.10 The table overleaf provides recommended avoidance, mitigation and compensation measures. Avoidance measures should be considered first, followed by mitigation. If net gain cannot be achieved through avoidance and mitigation, compensation measures are required.

Table 6. Recommendations based on the mitigation hierarchy & good practice principles

Habitat type	Unit Deficit	Avoidance	On-Site: habitat enhancement / creation	Off-Site: habitat enhancement / creation	Compensation (Estimated cost per unit)	
					3rd party Supplier*	Statutory Credits
Other neutral grassland	0.59	If possible, proposals should be amended to retain a greater area of the existing other neutral grassland.	To reduce the biodiversity unit deficit the following habitat creation measures should be explored: • Include new, extensive areas of other neutral grassland within proposals • Replace areas of modified grassland, for example dwelling frontages/road verges, with other neutral grassland • Creation of traditional orchard on retained/restored other neutral grassland	It is unlikely that on-site mitigation can fully compensate for habitat loss without a reduction in the scale of proposals. The creation or enhancement of other neutral grassland off-site could therefore also be considered. Suitable sites should have a low baseline biodiversity unit value, ideally either cropland, modified grassland or poor condition other neutral grassland and should be located within the LPA/NCA boundary. To maximise the number of units created, the site should also lie within the Romney Marshes and Rye Bay Biodiversity Opportunity Area. As an example, 0.069 ha of other neutral grassland (good condition) created on cropland located within the LPA/NCA boundary and the Biodiversity Opportunity Area would produce 0.60 units of other neutral grassland, sufficient to satisfy this deficit.	£27,000	£84,000

Habitat type	Unit Deficit	Avoidance	On-Site: habitat enhancement / creation	Off-Site: habitat enhancement / creation	Compensation (Estimated cost per unit)	
					3rd party Supplier*	Statutory Credits
Bramble scrub	0.03	Amend proposals to include the retention of existing scrub on the Site boundaries.	To compensate for the loss of mixed and bramble scrub within the Site, the following habitat creation measures should be explored: • Enhancement of retained bramble scrub to mixed scrub An increase in the area of new scrub planting is not recommended as it would likely lead to a greater deficit of other neutral grassland.	The creation or enhancement of mixed scrub off-site could also be considered. Suitable sites should have a low baseline biodiversity unit value, ideally either cropland or modified grassland and should be located within the LPA/NCA boundary.	£30,000	£84,000
Any habitat	1.04	N/a	In addition to addressing the unit deficits for habitats identified by the trading summary, a minimum of 1.04 units of habitat creation are required to make a 10% gain. Consider pond creation, planting of additional trees, green roof or green wall.	The creation and or enhancement of any habitat type on off-site land. Habitats identified within the desk study, including those of strategic significance and local importance, should be prioritised. Suitable sites should have a low baseline biodiversity unit value and be located within the LPA/NCA boundary.	Varies with habitat type	

**There a large number of 3rd party suppliers in the market, and prices will vary according to the supplier, the level of service provided and the location of units.*

15.12 Appendix 1 provides a plan showing the proposed recommendations.

OTHER CONSIDERATIONS

Management and monitoring

15.13 All created and enhanced habitats, either on-site or off-site, must be managed for a period of 30 years.

15.14 Monitoring should be undertaken annually for 5 years, then every 5 years until the end of the 30 year period, and any required remedial actions should be undertaken.

Sustainability

15.15 As part of the net gain process, the wider environmental benefits of the project should be optimised.

15.16 Measures can include:

- Use of locally sourced materials and plants to reduce carbon footprint.
- Use of sustainable and plastic free materials.
- Maximise 'green' area to increase carbon storage potential. For example, consider the use of grass-crete in place of concrete.
- Planting of trees and hedgerow to increase carbon storage potential and reduce heat island effect.

16. NEXT STEPS

16.1 Schedule 14 of the Environment Act 2021 makes provision for a biodiversity gain of at least 10% to be a condition of planning permission in England.

16.2 Although a pre-commencement condition, the Local Planning Authority (LPA) will likely require information during the decision making process to ensure that the biodiversity obligation can be met and that the condition can be discharged successfully.

16.3 Appendix 4 gives a visual summary of BNG within the planning process up to the point of approval.

16.4 The next steps in Biodiversity Net Gain process are outlined below.

REVISE LAYOUT

16.5 Consider the avoidance and on-site mitigation recommendations outlined in Section 15 and revise the development layout as appropriate. This should be an iterative process involving the design team and the ecologist, and should aim to maximise on-site delivery of biodiversity units.

CONSIDER OFF-SITE MITIGATION

16.6 If a unit deficit remains after avoidance and on-site mitigation measures have been maximised, the provision of off-site mitigation can be considered. To identify a suitable site for off-site mitigation, the location and ecological baseline should be considered. Sites with a low ecological baseline (for example developed land, cropland or modified grassland) and located within the LPA/NCA boundary will provide the greatest return.

16.7 Any off-site mitigation delivered by the developer is subject to the same legal requirements as units derived from 3rd party suppliers (see below).

DESIGN STAGE REPORT

16.8 On completion of layout revisions, a Biodiversity Net Gain Design Stage Report should be produced for submission with the planning application. This should provide details of the proposed habitat creation and enhancement measures that will be undertaken on-site and include a completed Metric Calculation and Kent Biodiversity Gain Statement.

16.9 Details of off-site mitigation/compensation, if finalised, can also be included within this report.

APPROACH 3RD PARTY SELLERS

16.10 If compensation is required to make net gain, 3rd party suppliers should be approached to determine if appropriate units are available. At least 3no. suppliers must be contacted before Statutory Credits can be considered.

SECURE OFF-SITE UNITS

16.11 To secure off-site units, a legal agreement will be required (S106 or Conservation Covenant), which will last at least 30 years from completion of the habitat measures.

16.12 Responsibility for habitat enhancement, creation and management will vary depending on the type of legal agreement. In the case of 3rd party units, responsibility will fall on the landowner or Responsible Body. However, when the developer is making gains on their own off-site land, they must take on this responsibility.

16.13 In addition, the off-site land must be registered on the biodiversity gain site register.

BIODIVERSITY GAIN PLAN

16.14 On receipt of planning permission, a Biodiversity Gain Plan must be completed and approved by the LPA before works can commence. This must be considered when planning a timetable of works. The biodiversity gain plan can only be submitted after planning permission is granted, and should be approved by the LPA within 8 weeks.

16.15 The biodiversity gain plan will detail the measures that will be undertaken to achieve a net gain. Application of the mitigation hierarchy must be evidenced within the biodiversity gain plan.

HABITAT MANAGEMENT AND MONITORING PLAN

16.16 The gain plan must be supported by a Habitat Management and Monitoring Plan (HMMP) if off-site mitigation or significant gains will be delivered.

16.17 The HMMP is a detailed plan that outlines how the land will be managed over at least 30 years to:

- Create and enhance habitats for biodiversity net gain (BNG)
- Manage and monitor the BNG

16.18 Natural England have produced a template (Natural England, 2023) to facilitate the completion of this document, with accompanying guidance.

PURCHASE OF STATUTORY CREDITS

16.19 On acceptance of the Biodiversity Gain Plan, any required statutory credits must be purchased.

17. REFERENCES

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18. APPENDIX 1: HABITAT DEFINITIONS

Table 7. Habitat creation definitions and recommendations (continued overleaf)

Habitat Type	Definition	Recommendations
Small urban tree	The diameter of the tree at breast height (DBH) is 7.5-30cm at the time of planting.	To maximise the condition and biodiversity benefit of the planted trees it is recommended that native species are chosen for planting, and that they are planted in a location where they over sail vegetation.
Other neutral grassland	Grassland containing 9-15 species, per m2 including less than 30% perennial rye grass.	Areas of wildflower and wetland meadow should be sown with appropriate seed mixes, for example Emorsgate General Purpose Meadow Mixture EM1. Seeding with a mixture that includes wild flowers will provide opportunities for pollinating insects. To maximise condition and biodiversity value it is recommended that the grassland is managed with a mowing regime appropriate for meadow. In some instances, soil nutrient stripping may be required to achieve higher conditions.
Traditional orchard	Open grown fruit (or nut) trees set in herbaceous vegetation and managed at a low intensity (without the use of chemicals, infrequent mowing and a low density of trees).	To maximise condition and biodiversity value it is recommended that the orchard is under-seeded with a meadow grassland mix such as Emorsgate EM1-10, which is managed with a mowing regime appropriate for meadow.
Green roof	Three categories of green roof are available: • Other green roof (sedum or wildflower blanket) • Intensive green roof (a green roof designed as a garden with >70% of the surface soil and vegetation) • Biodiverse green roof (a green roof designed specifically for biodiversity with a substrate depth that varies between 80 and 150 mm and contains a diverse mix of dry grassland windflowers and sedum species and other habitat features such as bee bricks or log piles).	Green roof should be maintained appropriately and contain a wide diversity of native plant species and those with pollinator interest.

Habitat Type	Definition	Recommendations
Ground based green wall	Ground based climbing plants intended for ornamental purposes.	To optimise the condition of the green wall it should contain a variety of climbing species so that the vegetation is varied in structure and a variety of niches are available for wildlife. Ideally species should be chosen that provide a source of fruit and/or nectar at different times of year. Any invasive plant species should be removed annually.
Mixed scrub	Scrub containing a mixture of native shrubs (less than 5m tall) with over 90% continuous canopy cover.	To maximise the condition and biodiversity of the scrub it is recommended that a variety of at least 3 native shrub species are planted, and that tall grassland and or/herbs are encouraged along the boundary of scrub habitat. The inclusion of fruiting and flowering species can provide additional foraging opportunities for wildlife.
Native hedgerow	A hedgerow containing 1-4 native woody shrub or tree species. The hedgerow must consist of 80% or greater native species.	To maximise the condition and biodiversity value it is recommended that only native species are planted and the hedgerow is allowed to grow greater than 1.5m in both width and height. The inclusion of fruiting and flowering species can provide additional foraging opportunities for wildlife. The native species-rich hedgerows should be under-seeded with a suitable seed mix, such as Emorsgate EH1 hedgerow mixture.
Native hedgerow with trees	A hedgerow containing 1-4 native woody shrub or tree species. The hedgerow must consist of 80% or greater native species and there must be at least one mature tree per 20m stretch of hedgerow.	
Native species-rich hedgerow	A hedgerow containing 5+ native woody shrub or tree species. The hedgerow must consist of 80% or greater native species.	

19. APPENDIX 2: RELEVANT LEGISLATION

BIODIVERSITY NET GAIN

19.1 Schedule 14 of the Environment Act 2021 makes provision for biodiversity gain to be a condition of planning permission in England. The Act amends the Town and Country Planning Act 1990 so that all planning permissions (except a small number of exemptions) will be subject to a pre-commencement planning condition requiring a Biodiversity Gain Plan to be approved by the Local Planning Authority (LPA). The biodiversity gain plan must demonstrate a net gain of at least 10% in the biodiversity value of the development site.

19.2 The Environment Act 2021 sets out the following key components of mandatory biodiversity gain:

- Minimum 10% gain required calculated using the Biodiversity Metric
- Delivered on-site, off-site or via a new statutory biodiversity credits scheme
- On-site and off-site habitat secured for at least 30 years via planning obligations or conservation covenants
- National register for net gain delivery sites

20. APPENDIX 3: BNG GOOD PRACTICE PRINCIPLES AND GUIDELINES

20.1 This assessment was undertaken in accordance with the following good practice guidelines:

- BS 8683 Process for designing and implementing biodiversity net gain
- CIRIA (2019). Biodiversity net gain. Good practice principles for development: A practical guide.
- CIEEM, CIRIA, IEMA (2016). Biodiversity net gain: Good practice principles for development.
- CIEEM (2021). Biodiversity Net Gain Report and Audit Templates Chartered Institute of Ecology and Environmental Management, Winchester, UK.
- Defra (2024). The Statutory Biodiversity Metric - Draft User Guide

OVERARCHING PRINCIPLES

20.2 Ten principles are set out within guidance from CIEEM, CIRIA and IEMA for achieving biodiversity net gain. These principles (outlined below) have been used as a guide for this assessment and underpin the recommendations detailed in Section 9.

Principle 1: Apply the Mitigation Hierarchy

When using the biodiversity metric the principles and approach of the mitigation hierarchy must be employed. This includes avoiding impacts to ecological features where at all possible. If negative impacts cannot be avoided, mitigation and compensation measures should be undertaken to reduce the effects on ecological features.
Due to the method in which habitat creation and enhancement risks are accounted for within the metric, gains are more easily achieved where impacts to habitats are avoided.

Principle 2: Avoid losing biodiversity that cannot be offset elsewhere

Avoid impacts to irreplaceable habitats. A BNG Assessment cannot be carried out where these habitats are impacted as a result of proposals.

Principle 3: Be inclusive and equitable

Engage stakeholders early and achieve net gain in partnership where possible.

Principle 4: Address risks

Account for any risks and add contingency when calculating losses and gains.

Principle 5: Make a measurable Net Gain contribution

Contribute towards local nature conservation priorities.

Principle 6: Achieve the best outcomes for biodiversity

Use robust and credible evidence that is underpinned by local knowledge of biodiversity priorities when making decisions about appropriate habitats to enhance and create.

Principle 7: Be additional

Achieve nature conservation outcomes that demonstrably exceed existing obligations.

Principle 8: Create a Net Gain Legacy

Ensure that net gain creates long-term sustainable benefits by mitigating risk and planning for long-term resilient management.

Principle 9: Optimise sustainability

Consider wider environmental benefits for societal and economical sustainability.

Principle 10: Be transparent

Communicate the net gain process and assessment, including justifications for decision making, to all stakeholders.

THE STATUTORY BIODIVERSITY METRIC

20.3 Whilst the metric can aid decision making on the areas a specific habitat types to be enhanced or created, the overall assessment should consider the principles of biodiversity net gain holistically alongside calculation scores.

Principles of the Statutory Metric

20.4 The Biodiversity Metric calculation has been undertaken in accordance with the principles set out within The Statutory Biodiversity Metric Draft User Guide (Defra, 2024) as follows:

Principle 1: The metric assessment should be completed by a competent person.

Principle 2: The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.

Principle 3: This biodiversity metric should be used in accordance with established good practice guidance and professional codes.

Principle 4: This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.

Principle 5: Biodiversity units are a proxy for biodiversity and should be treated as relative values.

Principle 6: This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.

Principle 7: Habitat interventions need to be realistic and deliverable within a relevant project time frame.

Principle 8: Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.

Principle 9: 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)
- ensure that proposed or retained habitat parcels are of sufficient size for ecological function

Rules of the Statutory Metric

20.5 In addition to the set of guiding principles, the biodiversity units are calculated using a set of 5 'rules' as detailed by Defra within The Statutory Biodiversity Metric Draft User Guide (Defra, 2024) as follows:

Rule 1: The trading rules of the biodiversity metric must be followed.

Rule 2: Biodiversity unit outputs, for each unit type, must not be summed, traded or converted between types. The requirement to deliver at least 10% net gain applies to each type of unit.

Rule 3: To accurately apply the biodiversity metric formula, you must use the biodiversity metric calculation tool or small sites biodiversity metric tool.

Rule 4: In exceptional ecological circumstances, deviation from this metric methodology may be permitted by the relevant planning authority.

Biodiversity Net Gain

BASELINE TO PLANNING APPROVAL

1
Baseline & Feasibility Assessment

Habitat mapping, condition assessment, initial post-development mapping and input into Metric. Advice on how 10% could be achieved.

2
Design Stage

Liaison with design team to address any shortfall in 10% and trading rules. Amendment to design & remapping / Metric.

3
Submit to LPA

Submission of Design Stage Report & Metric to give LPA confidence that 10% gain is achievable.

4
General Biodiversity Gain Condition

Planning permission granted with a pre-commencement condition requiring 10% gain.

5
Biodiversity Gain Plan

Complete Gain Plan Template and associated documents. Submit to discharge Planning Condition.

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