

LAND NORTH OF ASHFORD ROAD (A20)

Biodiversity Gain Plan

Prepared for: Wates Developments Ltd

SLR Ref: 404.000010.00001
Version No: 3
February 2023



Document Control	
Document Properties	
Organisation	SLR Consulting
Project Name	Land North of Ashford Road
Report Title	Biodiversity Gain Plan
Author(s)	Giselle Hynes
Draft version/final	Final
Document reference	404.000010.00001 Ashford Road_Biodiversity Gain Plan

Date	Revision No	Prepared By	Reviewed By	Approved By	Status	Comments
26/01/23	0	Giselle Hynes	Michelle Robertson	Ruth Holland	Final	Issued for client comment
01/02/23	1	Giselle Hynes	Michelle Robertson	Ruth Holland	Final	Minor client changes.
14/02/23	2	Giselle Hynes	Michelle Robertson	Ruth Holland	Final	Client changes- location of offsite BNG flexibility.
15/02/23	3	Giselle Hynes	Michelle Robertson	Ruth Holland	Final	Client changes- no location for offsite BNG.

BASIS OF REPORT

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CONTENTS

SUMMARY	1
1.0 INTRODUCTION	2
1.1 Site Description	2
1.2 Purpose of this Report - Status of biodiversity gain plan	2
1.3 Other supporting documents.....	2
1.4 Relevant Policy and Legislation	2
1.4.1 Environment Act 2021.....	2
1.4.2 National Planning Policy Framework.....	2
1.4.3 Local Development Plan.....	3
2.0 KEY CONCEPTS	5
2.1 Overview.....	5
2.2 Definitions.....	5
2.3 Methodology.....	6
2.4 Metric 3.1 Principles and Rules.....	6
2.5 Evidence of Technical Competent and Experience	9
2.6 Limitations	9
3.0 BASELINE.....	10
3.1 Pre-development Habitats.....	10
3.2 Baseline Habitat Value	12
4.0 PROPOSED HABITAT CHANGES (ON AND OFF-SITE).....	13
4.1 Future Habitat Creation	13
4.2 Current Site Baseline to Proposed Post-intervention Habitats	13
4.2.1 Habitat Units.....	13
4.2.2 Hedgerow Units.....	13
4.2.3 Overall Change.....	13
5.0 HABITAT CHANGES TO ACHIEVE BIODIVERSITY NET GAIN	16

DOCUMENT REFERENCES

TABLES

Table 3-1 Baseline Habitats within the Proposed Development Site.....	10
Table 3-2 Summary of Baseline Habitat Value	12
Table 4-1 Summary of Proposed Biodiversity Performance	14

FIGURES

Figure 1-1 Site Location Plan	1
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Summary

The National Planning Policy Framework (NPPF) supports planning policies and decisions that contribute to and enhance the natural and local environment by “minimising impacts on and providing net gains for biodiversity”.

The proposed development has been designed to minimise the loss of habitats (impacts) despite limited opportunities onsite to provide net gains for biodiversity. Creation of habitat within the red line boundary, to support a biodiversity net gain will occur, but offsite habitat creation will be required to deliver a net gain.

Wates Development Ltd. are pursuing suitable options for off-site BNG with several land parcels under the applicants control in the local Maidstone Borough Council area as possible options for off-site BNG. Assessment of habitat condition and suitability of the sites is ongoing and will be provided to the LPA when available. Any option chosen will provide a minimum 10% biodiversity net gain in relation to the assessment undertaken for the Site.

Prior to off-site habitat creation, the development will deliver **-2.33 BU of habitat units**, delivering a **-39.94% net loss**, and a **+0.10BU of hedgerow units**, delivering a **12.36% net gain**.

The development does not affect irreplaceable habitats.

The biodiversity performance identified within this report would need to be subject to agreements, development of landscape planting plans and site management plans to secure the necessary level of biodiversity delivery.

1.0 Introduction

SLR Consulting Ltd (SLR) was commissioned by Wates Developments Limited to undertake an evaluation of biodiversity performance and to produce a Biodiversity Gain Plan for a proposed c. 122,392.2 sq.ft industrial warehouse with associated parking and landscaping, on land north of Ashford Road near to Maidstone in Kent, hereafter referred to as the Site.

The planning application for the Site falls within the administration of Maidstone Borough Council. A full description of the development is provided in the Ecological Impact Assessment (EIA) that forms part of the Planning Application (PA) for the proposed development.

The purpose of this biodiversity gain plan is to inform the relevant planning authority of the biodiversity gain outcome.

1.1 Site Description

The main Site comprises a 2.88 ha roughly triangular arable field, bordered by hedgerows and scrub and sandwiched between Musket Lane to the north, and Ashford Road to the south. The red line boundary also encompasses visibility splays that comprise of hardstanding. The biodiversity net gain assessment was undertaken in the Site boundary without visibility splays. The centroid location of the Site is TQ 82239 54733. Typically, the surrounding land is dominated by farmland with some built up areas including dwellings, farms and a camp site (see Figure 1-1).

Figure 1-1 Existing Site Layout Plan



1.2 Purpose of this Report - Status of biodiversity gain plan

This report is intended to provide the local planning authority with sufficient information on the biodiversity performance of the proposed development to inform consideration of the outline planning application and specifically alignment of the application with the relevant planning policy.

1.3 Other supporting documents

This report is supported by a number of other documents or figures, including:

- Current Habitat Baseline Mapping;
- Landscape Masterplan;
- Summary outputs or results from use of Natural England's Biodiversity Metric 3.1¹.

1.4 Relevant Policy and Legislation

1.4.1 Environment Act 2021

The Environment Act (the Act) gained Royal Assent on 9 November 2021 and is now enshrined within UK law. The Act provides a mechanism for implementing Government's ambitions for 'improving the natural environment', which were previously set out in publications including the 25 Year Environment Plan. The Act provides recognition of the 25 Year Environment Plan as the first "environmental improvement plan" which will, once the relevant regulations come into force, be used as the basis for understanding the steps Government intends to take to improve the natural environment.

The Act implements the ambitions for an improved natural environment, by setting out statutory or legal requirements which mandate action, under the oversight of the newly formed Office for Environmental Protection (OEP). The focus of the Act is the "...provision [of] targets, plans and policies for improving the natural environment..." and its requirements are structured around a number of broad themes.

Of relevance to this report Part 6 of the Act sets out provisions for 'Biodiversity gain as condition of planning permission'. Once enacted, amendments to the Town and Country Planning Act 1990 will in future (expected to be by November 2023) require planning applications to be supported with additional information on the change in the biodiversity value attributed to a project, with biodiversity metric calculations, and with biodiversity gain plans. Planning authorities will be required to consider these submissions in the exercise of their planning functions, to ensure that they are secured, approved and where relevant registered.

While the Environment Act is now part of UK law, its required actions do not commence either directly or immediately, for all parties. There remain a range of preparatory actions that need to be undertaken before further implementation of the wider legal framework (secondary legislation or regulations) will take place.

1.4.2 National Planning Policy Framework

A summary of national planning policy relevant to (onshore) biodiversity in England and Wales is provided below. Note that the summary provided here is intended for general guidance only and the original policy documents should be consulted for definitive information.

For local planning policy relevant to biodiversity the relevant local plans is provided below.

¹ Natural England (2022). The Biodiversity Metric 3.1 (JP039). [The Biodiversity Metric 3.1 - JP039 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk)

National - The National Planning Policy Framework (NPPF), 2021

The National Planning Policy Framework (NPPF)² sets out guidance for local planning authorities and decision makers on how to apply planning policies when drawing up plans and making decisions about planning applications. Along with Government Circular 06/05³, the broad policy objectives in relation to the protection of biodiversity and geological conservation in England through the planning system are set out. Specific policies relating to habitats and biodiversity are set out in paragraphs 174 and 179-182 of the NPPF.

Paragraph 174 states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); ...

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; ...”

Paragraph 180 of the NPPF states that:

“When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; ...

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

1.4.3 Local Development Plan

The current adopted Maidstone Borough Local Plan addresses nature conservation and biodiversity matters under Policy *DM3 Natural Environment*.

Policy *DM3 Natural Environment* is set out as follows:

Natural environment

1. To enable Maidstone borough to retain a high quality of living and to be able to respond to the effects of climate change, developers will ensure that new development protects and enhances the natural environment by incorporating measures where appropriate to:

i. Protect positive landscape character, areas of Ancient Woodland, veteran trees, trees with significant amenity value, important hedgerows, features of biological or geological interest, and the existing public rights of way network from inappropriate development and avoid significant adverse impacts as a result of development;

² Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework.

³ Office of the Deputy Prime Minister (2005). ODPM Circular 06/2005. Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.

ii. Avoid damage to and inappropriate development considered likely to have significant direct or indirect adverse effects on:

a. Internationally, nationally and locally designated sites of importance for biodiversity; and b. Local Biodiversity Action Plan priority habitats;

iii. Control pollution to protect ground and surface waters where necessary and mitigate against the deterioration of water bodies and adverse impacts on Groundwater Source Protection Zones, and/or incorporate measures to improve the ecological status of water bodies as appropriate;

iv. Enhance, extend and connect designated sites of importance for biodiversity, priority habitats and fragmented Ancient Woodland; support opportunities for the creation of new Biodiversity Action Plan priority habitats; create, enhance, restore and connect other habitats, including links to habitats outside Maidstone Borough, where opportunities arise;

v. Provide for the long term maintenance and management of all natural assets, including landscape character, associated with the development;

vi. Mitigate for and adapt to the effects of climate change; and

vii. Positively contribute to the improvement of accessibility of natural green space within walking distance of housing, employment, health and education facilities and to the creation of a wider network of new links between green and blue spaces including links to the Public Rights of Way network.

2. Where appropriate, development proposals will be expected to appraise the value of the borough's natural environment through the provision of the following:

i. An ecological evaluation of development sites and any additional land put forward for mitigation purposes to take full account of the biodiversity present, including the potential for the retention and provision of native plant species;

ii. Arboricultural assessments to take full account of any natural assets connected with the development and associated sites; and

iii. A landscape and visual impact assessment to take full account of the significance of, and potential effects of change on, the landscape as an environmental resource together with views and visual amenity.

2.0 Key Concepts

2.1 Overview

Natural England advise that Biodiversity Metric 3.1 *“can be used or specified by any development project, consenting body or landowner that needs to calculate biodiversity losses and gains for terrestrial and/or intertidal habitats. It will be this metric that underpins the Environment Bill’s provisions for mandatory biodiversity net gain in England...”*. It has become the standardised way of describing biodiversity change in England, noting that there are a limited number of local exceptions to its use. The biodiversity evaluation of the proposed development has been undertaken using Biodiversity Metric 3.1.

It is noted that Natural England published Biodiversity Metric 3.1⁴ on 21 April 2022, but that their advice remains that *“Users of the previous Biodiversity Metric 3.1 should continue to use that metric ... for the duration of the project it is being used for as they may find that certain biodiversity unit values metric 3.1 generates will differ from those generated by Biodiversity Metric 3.1”*. It is therefore considered appropriate to continue to report on this proposed development’s biodiversity performance using Biodiversity Metric 3.1.

The Biodiversity Metric uses a comparison of habitats as a proxy for biodiversity and describes these habitats using standard units referred to as biodiversity units (BUs). There are 3 distinct types of BUs and these are not of equivalence or interchangeable, they are:

- Habitat BUs – which describe areas of habitat based on measurement in hectares;
- Linear BUs – which describe hedgerows and lines of trees measured in kilometres; and
- Riparian BUs – which described rivers and streams measured again in kilometres.

The overall calculation of the change in biodiversity resulting from a project or development is derived by subtracting pre-project or ‘baseline’ biodiversity units valuation of an area of land from the number of post-project units.

The results are influenced by:

- Habitat area/length;
- Distinctiveness (an indication of value);
- Condition – an indication of quality; and
- Multipliers or risk factors – that take account of the contribution to local priorities, the difficulty of habitat creation/management, the time it takes to deliver and variation in the location of habitat delivery.

Biodiversity units can be created on site, off site (in land under the client’s control) or through a mixture of both. If off site, the habitat must be within the same local planning authority (LPA).

2.2 Definitions

In the context of this project, we have assumed the following definitions:

- Biodiversity Net Gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand.

Under the Act the relevant percentage for Biodiversity Net Gain is a change in value attributed to a development $\geq 10\%$ the pre-development value (of onsite habitats). It should be noted that while the Act sets out the relevant

⁴ Natural England (2022). [The Biodiversity Metric 3.1 - JP039 \(naturalengland.org.uk\)](https://naturalengland.org.uk)

percentage for Biodiversity Net Gain, the relevant parts of the Act (Section 98 and Schedule 14) are still subject to implementation through secondary legislation before they formally apply to applications.

In the interim, clarification of requirements for BNG have been set out through recent appeal decisions⁵ which have clarified that

- *“the 10% biodiversity net gain requirement set out in the Act is not yet law and is not applicable to these appeals”;*
- *“Paragraph 174 of the Framework [the NPPF encourages applicants to], ... seek a net gain in biodiversity without identifying a specific percentage...”*
- The relevant Core Strategy may *“...seek a net gain in biodiversity without identifying a specific percentage...”*; and
- *“A net gain of just 1% would be policy compliant in these circumstances.”*

2.3 Methodology

In supporting the assessment of biodiversity changes SLR have made reference to:

- [Biodiversity Metric 3.1 - Calculation Tool](#);
- [Biodiversity Metric 3.1 - User Guide](#);
- [Biodiversity Metric 3.1 - Technical Supplement](#).

The Metric uses a unified habitat classification system known as UKHab⁶. This system provides a number of benefits over existing systems such as Phase 1 and NVC, and allows Natural England, Scottish Natural Heritage, Natural Resources Wales, Department of the Environment Northern Ireland and JNCC to report consistently on habitats of European and national significance. UKHab information has been used where available to support the assessment of biodiversity changes.

Where habitat data has been recorded using the Phase 1 habitat classification system, these have been subject to conversion to UKHab classifications using the Metric Phase 1 translation tool.

In addition, the approach requires the condition of habitats to be assessed. Where habitat data was collected before the publication or widespread use of the Metric this is unlikely to have been collected and, in this case, an assumed condition rating has been adopted. Such variations from the Metric approach are explained in the relevant sections.

2.4 Metric 3.1 Principles and Rules

Natural England advise that the Metric is a tool that helps inform plans and decisions, by using habitats as a proxy for measuring biodiversity value, but that any assessment must be undertaken with awareness of its limitations. The metric specifically requires interpretation and ecological expertise to provide evidence of the appropriateness of proposed approaches to BNG and sets out a series of key principles and rules that help to support an understanding of whether proposals support wider considerations that a calculation output.

The Metric User Guide indicates that assessments should be conducted with regard to:

⁵ Planning Inspectorate (2022). Appeal Decisions APP/Y3940/W/21/3278256, APP/Y3940/Q/21/3278923, APP/Y3940/W/21/3282365

⁶ <https://ukhab.org/>

- **Principle 1:** *The metric does not change the protection afforded to biodiversity. Existing levels of protection afforded to protected species and habitats are not changed by use of this or any other metric. Statutory obligations will still need to be satisfied.*
- **Principle 2:** *Biodiversity metric calculations can inform decision-making where application of the mitigation hierarchy and good practice principles⁷ conclude that compensation for habitat losses is justified.*
- **Principle 3:** *The metric's biodiversity units are only a proxy for biodiversity and should be treated as relative values. While it is underpinned by ecological evidence the units generated by the metric are only a proxy for biodiversity and, to be of practical use, it has been kept deliberately simple. The numerical values generated by the metric represent relative, not absolute, values.*
- **Principle 4:** *The metric focuses on typical habitats and widespread species; important or protected habitats and features should be given broader consideration.*
 - *Protected and locally important species needs are not considered through the metric, they should be addressed through existing policy and legislation.*
 - *Impacts on protected sites (e.g. SSSIs) and irreplaceable habitats are not adequately measured by this metric. They will require separate consideration which must comply with existing national and local policy and legislation. Data relating to these can be entered into the metric, so as to give an indicative picture of the biodiversity value of the habitats present on a site, but this should be supported by bespoke advice.*
- **Principle 5:** *The metric design aims to encourage enhancement, not transformation, of the natural environment. Proper consideration should be given to the habitats being lost in favour of higher-scoring habitats, and whether the retention of less distinctive but well-established habitats may sometimes be a better option for local biodiversity. Habitat created to compensate for loss of natural or semi-natural habitat should be of the same broad habitat type (e.g. new woodland to replace lost woodland) unless there is a good ecological reason to do otherwise (e.g. to restore a heathland habitat that was converted to woodland for timber in the past¹⁵).*
- **Principle 6:** *The metric is designed to inform decisions, not to override expert opinion. Management interventions should be guided by appropriate expert ecological advice and not just the biodiversity unit outputs of the metric. Ecological principles still need to be applied to ensure that what is being proposed is realistic and deliverable based on local conditions such as geology, hydrology, nutrient levels, etc. and the complexity of future management requirements.*
- **Principle 7:** *Compensation habitats should seek, where practical, to be local to the impact. They should aim to replicate the characteristics of the habitats that have been lost, taking account of the structure and species composition that give habitats their local distinctiveness. Where possible compensation habitats should contribute towards nature recovery in England by creating 'more, bigger, better and joined up' areas for biodiversity⁸.*
- **Principle 8:** *The metric does not enforce a mandatory minimum 1:1 habitat size ratio for losses and compensation but consideration should be given to maintaining habitat extent and habitat parcels of sufficient size for ecological function. A difference can occur because of a difference in quality between the habitat impacted and the compensation provided. For example, if a habitat of low distinctiveness is impacted and is compensated for by the creation of habitat of higher distinctiveness or better condition,*

⁷ CIEEM, CIRIA, IEMA (2016). Biodiversity Net Gain – Good Practice Principles for Development. https://www.cieem.net/data/files/Publications/Biodiversity_Net_Gain_Principles.pdf

⁸ Making Space for Nature: a review of England's wildlife sites and ecological network. Report to Defra (2010).

the area needed to compensate for losses can potentially be less than the area impacted. However, consideration should be given to whether reducing the area or length of habitat provided as compensation is an appropriate outcome.

In addition to these principles the Metric also sets out a series of rules that should be followed when undertaking a BNG calculation. These are:

- **Rule 1:** *Where the metric is used to measure change, biodiversity unit values need to be calculated prior to the intervention and post-intervention for all parcels of land / linear features affected.*
- **Rule 2:** *Compensation for habitat losses can be provided by creating new habitats, or by restoring or enhancing existing habitats. Measures to enhance existing habitats must provide a significant and demonstrable uplift in distinctiveness and/or condition to record additional biodiversity units.*
- **Rule 3:** *'Trading down' must be avoided. Losses of habitat are to be compensated for on a "like for like" or "like for better" basis. New or restored habitats should aim to achieve a higher distinctiveness and/or condition than those lost. Losses of irreplaceable or very high distinctiveness habitat cannot adequately be accounted for through the metric.*
- **Rule 4:** *Biodiversity unit values generated by biodiversity metric 3.1 are unique to this metric and cannot be compared to unit outputs from version 2.0, the original Defra metric or any other biodiversity metric. Furthermore, the three types of biodiversity units generated by this metric (for area, hedgerow and river habitats) are unique and cannot be summed.*
- **Rule 5:** *It is not the area/length of habitat created that determines whether ecological equivalence or better has been achieved but the net change in biodiversity units. Risks associated with creating or enhancing habitats mean that it may be necessary to create or enhance a larger area of habitat than that lost, to fully compensate for impacts on biodiversity.*
- **Rule 6:** *Deviations from the published methodology of biodiversity metric 3.1 need to be ecologically justified and agreed with relevant decision makers. While the methodology is expected to be suitable in the majority of circumstances it is recognised that there may be exceptions. Any local or project-specific adaptations of the metric must be transparent and fully justified.*

The Metric guidance also confirms:

- **Irreplaceable habitats** – the Metric does not adequately measure impacts on irreplaceable habitats and separate consideration should be given to relevant policy and legislation. These habitats can be entered into the calculator to give an indication of value or to support an understanding of enhancement or restoration actions and a guide to minimum areas of replacement habitats (compensation) but that *"bespoke compensation should be agreed with the relevant decision maker for any losses or impacts to these habitats"*.
- **Ancient woodland** – "Ancient woodland is a finite and irreplaceable resource and is protected by existing policy and legislation. However, ancient woodland is not a discrete habitat type and, as such, is not listed in biodiversity metric 3.1;
- **Woodland cover** – "In England there is a presumption against the loss of woodland and a need to increase overall woodland cover. The metric trading rules support the delivery of this policy through requiring 'like for like' habitat replacement for all high distinctiveness woodland types." With limited exceptions;
- **Hedgerows** – "Lost double hedgerows should be compensated with a double hedge, typically a path or track width apart."

2.5 Evidence of Technical Competent and Experience

This report has been prepared by Giselle Hynes. This report has been technically reviewed by Michelle Robertson and approved by Ruth Holland.

Giselle Hynes holds an MSc in Wildlife Management and Conservation from the from the University of Reading. She is a qualified member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Giselle has been a consultant ecologist for more than three years and has prepared reports for a range of different projects and plans.

This report has been reviewed by Michelle Robertson, an Associate Ecologist at SLR. Michelle is a full member of the CIEEM (MCIEEM) and has 10 years consultancy experience. Ruth Holland an Associate ecologist at SLR, an associate member of CIEEM (ACIEEM), with over nine years consultancy experience.

2.6 Limitations

No significant limitations were encountered during completion of the Biodiversity Net Gain assessment. Natural England note that Biodiversity Metric 3.1 has been extensively tested, but that they continue to listen to feedback to support correction of any errors or problems. No such errors were encountered.

The off-site land parcel is yet to be confirmed and assessment of habitat condition and suitability of the sites is ongoing and will be provided to the LPA when available.

3.0 Baseline

3.1 Pre-development Habitats

Full description of the baseline habitats within the Site are provided within the EclA that forms part of the Planning Application (PA) for the proposed development. This habitat survey was undertaken in accordance with UKHab methodology and using the associated classification system. The survey was undertaken in June 2022 and a summary of the habitats is given in and presented in **Figure 1-1**.

Wates Development Ltd. are pursuing suitable options for off-site BNG with several land parcels under the applicants control in the local Maidstone Borough Council area as possible options for off-site BNG. Assessment of habitat condition and suitability of the sites is ongoing and will be provided to the LPA when available. Any option chosen will provide a minimum 10% (approximately 0.95 units) biodiversity net gain in relation to the assessment undertaken for the Site.

Table 3-1: Baseline Habitats within the Proposed Development Site

Habitat Group	Size (ha/km)	Description
c1c Arable-cereal crop	2.75	The majority of the Site comprised arable field, currently growing wheat. The field margin was limited to 1 m in width. In the margins, common nettle <i>Urtica</i> was dominant. Other frequent species comprised mugwort <i>Artemisia vulgaris</i> , perennial rye grass <i>Lolium perenne</i> , false oat grass <i>Arrhenatherum elatius</i> , tall fescue <i>Festuca arundinacea</i> and hemlock <i>Conium maculatum</i> . Occasional yarrow <i>Achillea millefolium</i> , red campion <i>Silene dioica</i> , Yorkshire fog grass <i>Holcus lanatus</i> and broad-leaved dock <i>Rumex obtusifolius</i> were also recorded.
h3h Mixed scrub	0.02	Along the eastern and southern site boundaries were areas of mixed, dense scrub, dominated by hawthorn <i>Crataegus monogyna</i> . Downy birch <i>Betula pubescens</i> was also frequent. Species present less abundantly included hazel <i>Corylus avellana</i> , dogwood <i>Cornus sanguinea</i> and bramble. A single ash <i>Fraxinus excelsior</i> tree was also located in the south-eastern corner of the Site.
h3d Bramble scrub	0.03	Along the southern boundary of the Site, located on the slip road verge, was a bank dominated by bramble <i>Rubus fruticosus</i> agg. scrub with some isolated patches of common nettle. There was also a field maple <i>Acer campestre</i> and cherry <i>Prunus</i> sp. tree present, as well as a patch of blackthorn <i>Prunus spinosa</i> with dog rose <i>Rosa canina</i> .
g4 Modified grassland	0.08	An area of grass verge was located along the southern and western site boundaries, beyond the fence. The sward was dominated by perennial rye with false oat grass, common nettle and cock's foot <i>Dactylis glomerata</i> . Other occasional species included cow parsley <i>Anthriscus sylvestris</i> , cleavers

Habitat Group	Size (ha/km)	Description
		<i>Galium aparine</i> , horseradish <i>A Armoracia rusticana</i> , common chickweed <i>Stellaria media</i> , doves foot cranesbill <i>Geranium molle</i> , creeping cinquefoil <i>Potentilla reptans</i> , annual mercury <i>Mercurialis annua</i> , common mallow <i>Malva neglecta</i> , hemlock <i>Conium maculatum</i> and lesser burdock <i>Arctium minus</i> .
H2 190 Hedgerow with trees	0.12	A hawthorn dominated hedgerow with occasional blackthorn was located along part of the northern boundary of the Site. The ground flora comprised common nettle, with frequent stands of cleavers. Some white campion <i>Silene latifolia</i> , common mallow <i>Malva sylvestris</i> and burdock <i>Arctium</i> sp.were also present. Trees comprised two oak <i>Quercus robur</i> .
u1b Developed land, sealed surface	0.005	Where the Site boundary spread onto the A20 Ashford Road, a small strip of hardstanding road was encompassed into the survey area. This comprised a tarmac road with little encroaching vegetation.
u1e 69 Built linear feature, fence	0.005	A proportion of the northern boundary was fenced off by Heras fencing, along this boundary there were two black pines <i>Pinus nigra</i> and a single oak <i>Quercus robur</i> .

3.2 Baseline Habitat Value

A screen shot of the completed version of the DEFRA Biodiversity Metric 3.1 MS Excel calculator is provided alongside this Biodiversity Net Gain (BNG) report in Appendix 1. The MS Excel calculator contains all figures used in the calculations and contains ‘assessor comments’ to help link the figures provided to the existing and consented habitat plans of the Site. This actual excel file can be provided to the Local Planning Authority on request.

The total overall ecological baseline of the Site is **5.84 BU** (habitat) and **0.85 BU** (hedgerow).

A summary of current baseline biodiversity value to 2 decimal places is given in Table 4-1.

Table 4-1
Baseline Biodiversity Units

Biodiversity Unit Type	Area/Length (ha/km)	Baseline Units		Total Units
		On-site (dev. site)	Off-site (private or market provided)	
Area habitat	2.88	5.84	TBC	5.84
Linear habitat – Hedgerow with trees	0.12	0.85	N/A	0.85

4.0 Proposed Habitat Changes (On and off-site)

4.1 Future Habitat Creation

Biodiversity calculations have been completed for:

- Comparison of the current site baseline with the proposed post development habitats.

This comparison supports an understanding of the differences in biodiversity performance of proposed development between the current on-site habitats with those proposed post development.

The proposed post development broad habitats are illustrated in Figure 4-1
Indicative Habitat Types – Post-intervention Habitat Plan

4.2 Current Site Baseline to Proposed Post-intervention Habitats

In line with Metric 3.1 a comparison has been made between the current site baseline and the proposed post-intervention habitats (refer to Appendix 1).

4.2.1 Habitat Units

Once the proposed post development has been delivered, the total area of the development site is estimated to be 2.88 ha, comprising 0.56 ha of habitats and 2.32 ha of urban area.

The red line boundary, and basis for this assessment, includes the full extent of the planning application.

4.2.2 Hedgerow Units

The hedgerow on site is to be retained under current plans for the Site. A length of 0.027 km of hedgerow will also be created.

4.2.3 Overall Change

The proposed post development onsite habitats will result in a loss of onsite biodiversity units. The loss of habitat comprises a loss of low distinctiveness habitat (-5.29 BU) of cereal crops). However, this will be compensated for by:

- Creation of ground based green wall on eastern elevation comprising climbing plants (+0.02BU);
- Planting of 25 native trees of moderate condition (+0.31BU);
- Creation of onsite mixed scrub of good condition (+2.27BU);
- Creation of modified grassland on site (+0.64BU);
- Creation of ornamental planting on site (+0.04BU);
- Green roofs on gatehouse, visitor cycle store, secure cycle store and refuse store (+0.04BU);
- Creation of offsite habitat to be confirmed at a later date. Any option chosen will provide a minimum 10% net gain (approximately +0.95BU).

An overall summary is given in Table 4-1.

Table 4-1
Summary of Proposed Biodiversity Performance

Biodiversity Unit Type	Baseline Units		Post-Intervention Units		Total Net Change Units	% Net Gain/Loss
	On-site (dev. site)	Off-site (private or market provided)	On-site (dev. site)	Off-site (private or market provided)		
Area habitat	5.84	TBC	3.51	TBC	-2.33	-39.94
Linear habitat – Hedgerows/lines of trees	0.85	N/A	0.95	N/A	0.10	12.36

Figure 4-1
Indicative Habitat Types – Post-intervention Habitat Plan



5.0 Habitat Changes to Achieve Biodiversity Net Gain

The proposed development has aligned with the NPPF requirements to minimise impacts on biodiversity and is predicted to lead to the enhancement of biodiversity through the following:

- Flowering lawn – various areas of flowering lawn are to be created, with a diverse mix of wildflower species and to be mown every three to six weeks;
- Mixed scrub – Various areas of mixed scrub will be created, bordering the parking areas to the west of the Site. These are to comprise predominantly hawthorn and blackthorn, along with other native species;
- Tree planting – 25 trees are to be planted across the Site, comprising native species only;
- Green roofs – The security/gate house, refuse store and cycle stores are to have green roofs.
- Hedgerows – 26.78m m of native species rich hedgerow will be created on site in order to deliver hedgerow net gain.
- Creation of offsite habitat to be confirmed at a later date. Any option chosen will provide a minimum 10% net gain (approximately +0.95BU).
-

Assessment against the current baseline indicates that a decrease in the biodiversity performance of the Site is to take place, resulting in a -39.94% net loss. This will be mitigated through creation and enhancement of onsite habitat, as well as the creation of offsite habitat within land under control by the client and within the Maidstone Borough Council area. The location of off-site biodiversity net gain which is yet to be confirmed but will deliver a minimum 10% net gain.

The project will support the delivery of a (+0.10BU) increase in hedgerow habitat.

Once the offsite area for habitat creation is confirmed, the plans will satisfy the current requirement for biodiversity enhancement under the National Planning Policy Framework⁹.

⁹ Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework.

Appendix 1: Biodiversity Metric 3.1 Results

On-site baseline	<i>Habitat units</i>	5.84
	<i>Hedgerow units</i>	0.85
	<i>River units</i>	0.00
On-site post-intervention (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	3.51
	<i>Hedgerow units</i>	0.95
	<i>River units</i>	0.00
On-site net % change (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	-39.94%
	<i>Hedgerow units</i>	12.36%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-2.33
	<i>Hedgerow units</i>	0.10
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus (including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-39.94%
	<i>Hedgerow units</i>	12.36%
	<i>River units</i>	0.00%
Trading rules Satisfied?	No - Check Trading Summary ▲	

Summary Figures

Net project biodiversity units (including all on-site & off-site habitat retention/creation)	Habitat units	-2.33
	Hedgerow units	0.10
	River units	0.00

Total project biodiversity % change (including all On-site & Off-site Habitat Creation + Retained Habitats)	Habitat units	-39.94%
	Hedgerow units	12.36%
	River units	0.00%

Combined habitat retention and enhancement

	Habitats	Hedgerows	Rivers
Total on-site and off-site baseline area / length	2.88	0.12	0.00
Total on-site and off-site baseline units	5.84	0.85	0.00
Total on-site and off-site baseline area / length retained	3.79	0.12	0.00
Total on-site and off-site baseline units retained	0.18	0.85	0.00
Area / length proposed for enhancement	0.00	0.00	0.00
Baseline units proposed for enhancement	0.00	0.00	0.00
Total on-site and off-site baseline area / length lost	2.83	0.00	0.00
Total on-site and off-site baseline units lost	5.66	0.00	0.00

Trading Summary

Distinctiveness Group	Trading Rule	Trading Satisfied?
Very High	Require compensation limits to be required 1	Yes ✓
High	Some habitat required 2	Yes ✓
Medium	Some forest habitat or a higher distinctiveness habitat required 3	Yes ✓
Low	Some distinctiveness or better habitat required 2	No ✗

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