



BIODIVERSITY NET GAIN: DESIGN STAGE

HIGH KNOCKE FARM

DYMCHURCH, KENT

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1. SUMMARY

- 1.1 The biodiversity net gain assessment shows that current development proposals result in a **-20.94% loss** in the biodiversity value of habitats units, a **552.28% gain** in the value of hedgerows and a **40.74% gain** in the value of watercourse units. The trading summary results show that there is 17.32 deficit in other neutral grassland.
- 1.2 17.32 units of other neutral grassland will be purchased from a 3rd party supplier. This will satisfy the habitat trading rules and achieve a substantial net gain in habitat units (approximately 44% depending on the location of off-site land). A Biodiversity Gain Plan will be produced on receipt of planning permission to detail the specifics of the off-site unit purchase.
- 1.3 On-site losses have been compensated on-site as far as possible within the scope of proposals through the retention and enhancement of areas of other neutral grassland, creation of mixed scrub and the retention and enhancement of ponds.
- 1.4 The ditches will be retained within the Site, and enhanced where possible. A decrease in encroachment is predicted where the management practices of adjacent habitat are improved by the creation of a buffer of natural habitat in place of the existing agricultural regime.
- 1.5 The proposed hedgerow planting will provide good outcomes for biodiversity on both a local and landscape scale.
- 1.6 A Landscape and Ecological Management Plan (LEMP) will be produced to detail the ecological enhancements and habitat management prescriptions to be included as part of development proposals, together with appropriate monitoring.
- 1.7 The definition of habitats included in the Biodiversity Net Gain calculation, and the required management to meet the target condition, is provided in Appendix 2.

2. INTRODUCTION

- 2.1 This report details a Biodiversity Gain Report undertaken in respect of proposed development at High Knocke Farm, Dymchurch, Kent (site centred TR 09664 28834).

COMMISSION

- 2.2 Native Ecology was commissioned by Hill-Wood & Co. Ltd. in December 2023 to produce a Biodiversity Net Gain Design Stage Report to include baseline calculations of the Site and change in biodiversity value.

APPLICATION SITE

- 2.3 The application site, hereafter referred to as 'the Site' extends to approximately 6.4ha and comprises predominantly grazed grassland, with a series of ditches, three ponds and narrow margins of scrub along the northern boundary.
- 2.4 A location plan is provided in Section 2 and a plan of the existing Site is provided in Section 4.

PROPOSED WORKS

- 2.5 Proposals include the construction of 125no. residential dwellings with associated access (including five bridges), gardens and landscaping.
- 2.6 Section 5 provides a proposed landscape plan.

BIODIVERSITY NET GAIN PROCESS

- 2.7 A Preliminary Ecological Appraisal was undertaken by Native Ecology in June 2020 (Native Ecology, 2020). As a result of the findings of this survey, and in accordance with the mitigation hierarchy, it was recommended that the Landscape Plan should seek to retain wetland habitat features, including ponds and ditches.
- 2.8 A Biodiversity Net Gain Feasibility Assessment was carried out by Native Ecology in September 2022 (Native Ecology, 2022). Through an iterative process with the design team, on-site units were maximised within the scope of proposals, adding ditch enhancement, areas of other neutral grassland and additional tree and scrub planting to the layout plan.

PURPOSE OF REPORT

- 2.9 The objectives of the report are to:
- Describe the baseline habitats present within the Site.
 - Measure and map the habitats present within the Site.
 - Provide the baseline biodiversity units.
 - Provide a calculation of the post-development units.
 - Provide a summary of the overall net gain assessment calculations.

- Provide details of any additional measures that will be undertaken to achieve at least a 10% net gain based on appropriate good practice principles.

3. SITE LOCATION PLAN

See overleaf

4. EXISTING SITE PLAN

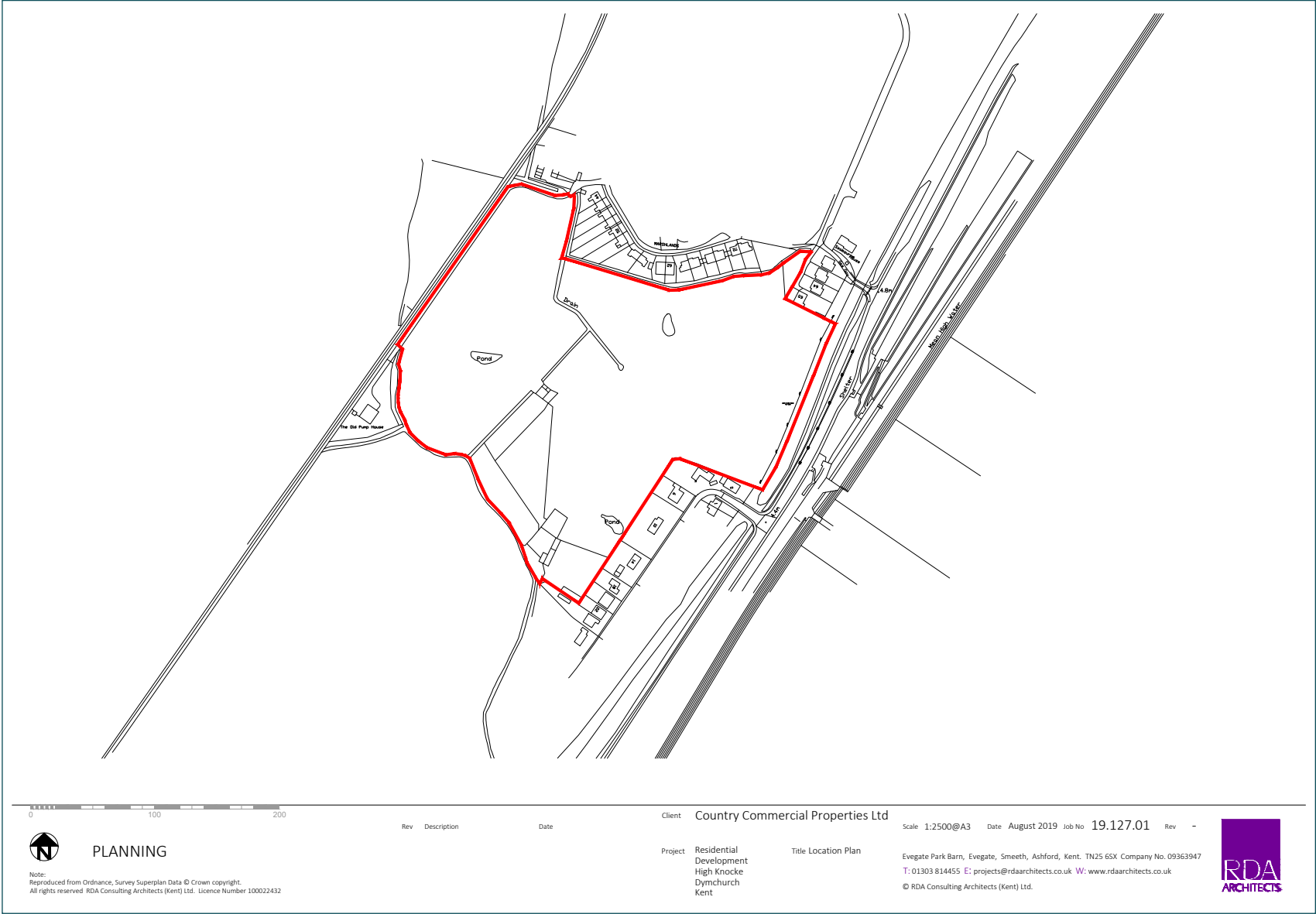


Figure 2. Existing site plan. Red line shows the survey area. Reproduced from RDA Architects, drawing reference: 19.127.01 Location Plan

5. PROPOSED LANDSCAPE PLAN



Figure 3. Proposed Landscape Strategy (HillWood and Co., Drawing no. 0339/23/A/1, revision dated December 2023).

6. METHODOLOGY

HABITAT CONDITION ASSESSMENT

- 6.1 An Ecological Impact Assessment (Native Ecology, 2024, report reference 0463_R01_Rev B) and Baseline Habitat Condition Assessment (Native Ecology, 2024, report reference 1003_R05_Rev D) are used to inform the baseline calculations within this report.

STATUTORY BIODIVERSITY METRIC

- 6.2 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.
- 6.3 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

- 6.4 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 Metric Calculation Tool gives the existing biodiversity unit value of the Site.

Habitat distinctiveness

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

Strategic significance

- 6.6 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

- 6.7 The calculation was then repeated for post-development. Appropriate figures, based on the current proposals, for habitat retention, creation and enhancement were input.
- 6.8 As the Metric measures predicted changes in biodiversity value, additional influences to account for risk are considered. Three risk factors are incorporated into the metric tool:
- Difficulty of creating or restoring a habitat
 - Temporal risk
 - Off-site risk
- 6.9 The post-intervention biodiversity units were then deducted from the baseline calculation to give a net change in unit value for the Site.

ASSESSMENT DOCUMENTS

6.10 The biodiversity net gain assessment calculations are based on the following documents:

- Proposed Landscape Strategy (HillWood and Co., Drawing no. 0339/23/A/1, dated December 2023).

LIMITATIONS

6.11 The calculation has been carried out to an accuracy of 0.001 ha/km.

6.12 The tree helper tool within the Net Gain Metric has been used to calculate the areas of existing and proposed trees. The tool provides an estimate, the true area will vary according to the size, species and condition of the tree.

6.13 Calculations assume that no habitats outside the red line boundary will be impacted by construction works and that created and enhanced habitats will be managed appropriately for the 30 year duration of the net gain agreement.

7. BASELINE CONDITIONS

ECOLOGICAL IMPACT ASSESSMENT

7.1 Table 1 provides a summary of the findings from the Ecological Impact Assessment (Native Ecology, 2024b).

Table 1. Summary of Preliminary Ecological Appraisal.

ECOLOGICAL FEATURE	ASSESSMENT
Designated sites	Given that the development proposal lies within the 7.2km zone of influence for the Dungeness, Romney Marsh and Rye Bay Ramsar and SPA, consideration will need to be made by the Local Authority to ensure that the proposals adhere to the agreed approach within the Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) to mitigate for any additional recreational impacts and that suitable measures are in place to secure appropriate mitigation.
Habitats of Principal Importance	Three ponds are present within the Site which are likely to meet the criteria for Habitat of Principal Importance. The ponds will be retained within the Site as part of development proposals. The removal of the invasive species Australian stone-crop is recommended.
Protected species	The following species were assessed to be present/ potentially present within the Site: foraging and commuting bats, badger, brown hare, hedgehog, water vole, nesting and wintering birds, reptiles and great crested newt. A water vole displacement licence (CL31) will be required for the construction of the bridge that spans D6. The remaining bridges will clear-span ditches to avoid impact to water vole. Other mitigation measures include passive displacement of water vole from the impacted area. The retained ditches and ponds will be enhanced with marginal planting, providing enhanced and created foraging habitat for water vole. A District Level Licence will be obtained to compensate for any impacts to great crested newt. Precautionary mitigation will be undertaken to reduce potential impacts to foraging and commuting bats, badger, brown hare, hedgehog, nesting birds and reptiles to negligible. The planting of trees, creation of hedgerows, wetland planting and implementation of a native and nectar rich planting plan is proposed to enhance the Site for wildlife.

IRREPLACEABLE HABITATS

7.2 No irreplaceable habitats are present within the Site.

OTHER HABITATS

7.3 Table 2 provides a summary of habitats present within the Site, and their baseline value. A full description is provided within the Habitat Condition Assessment Report (Native Ecology, 2024). A baseline habitat plans is provided in Section 8.

Table 2. Summary of habitats present within the Site

	HABITAT			CONDITION	STRATEGIC SIGNIFICANCE	AREA/ LENGTH	UNIT VALUE
Habitat units	Other neutral grassland			Poor	Low	6.51 ha	26.07
	Mixed scrub			Poor	Low	0.01 ha	0.04
	Ponds (non-priority)			Poor	Low	0.01 ha	0.06
	Ponds (priority)			Poor	Low	0.03 ha	0.09
	Developed land; sealed surface			n/a	Low	0.12	0.00
	Total						26.36
Hedgerow units	Line of trees			Moderate	Low	0.065 km	0.26
	Total						0.26
Watercourse units	HABITAT	WATERCOURSE ENCROACHMENT	RIPARIAN ENCROACHMENT	CONDITION	STRATEGIC SIGNIFICANCE	AREA/ LENGTH	UNIT VALUE
	Ditch	None	Major/major	Poor	Low	0.574 km	1.72
	Ditch	None	Major/none	Poor	Low	0.191 km	0.66
	Ditch	None	Major/none	Moderate	Low	0.187 km	1.30
	Total						3.69

8. BASELINE HABITAT PLAN

See overleaf



Legend

- Site boundary
- Other neutral grassland
- Mixed scrub
- Developed land, sealed surface
- Pond (priority)
- Pond (non-priority)
- Line of trees
- Ditch

Note:

Habitats mapped by eye based on UK Habitat Classification following a site visit undertaken on 26/05/2020.

Numbers refer to area parcel references. 'D' numbers refer to ditch. 'TL' numbers refer to tree line.

Habitat Condition

- * poor habitat condition
- ** moderate habitat condition
- *** good habitat condition
- n/a condition assessment not applicable



Figure 3 - Pre-Development Habitat Plan

High Knocke Farm Dymchurch Kent	
Drawing ref:	0463_DR02
Revision:	-
Date:	05/09/2022
Scale:	1:1400
Paper size:	A3

9. PROPOSED DESIGN

PROPOSALS

- 9.1 Proposals include the retention and enhancement of the three existing ponds and the other neutral grassland in areas of public open space. The tree line will also be retained.
- 9.2 Ditches 1, 2, 3 and 5 will be retained and enhanced. The riparian encroachment of ditches 1 and 2 will also be reduced given the change of management practice to the bank, from heavily grazed to natural grassland. Ditch 4 and 7 will be retained in their existing condition. Ditch 6 will be retained, but the proposed bridge will result in an increase in riparian encroachment. Therefore it has been recorded as lost and created within the Metric.
- 9.3 It is assumed that all other habitats within the Site will be lost during the construction process.
- 9.4 Landscaping will include areas of other neutral grassland (meadow), modified grassland (lawn) verges, rain garden, introduced shrubs, vegetated garden, native hedgerows and small urban tree planting.
- 9.5 Areas of aquatic marginal planting are also included within the design, but do not meet the minimum mapping unit to be considered within the Metric.
- 9.6 Scrub will be created around the boundaries of the Site to provide landscape screening and mitigation against predation of watervole.
- 9.7 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 11. Appendix 2 provides habitat definitions and management expectations.

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

	HABITAT	INTERVENTION	DESCRIPTION	TARGET CONDITION	STRATEGIC SIGNIFICANCE	AREA / LENGTH	UNITS DELIVERED	
Habitat units	Other neutral grassland	Enhancement	Other neutral grassland proposed within areas of public open space and along the bank of D6 will be retained and enhanced from poor to moderate condition.	Moderate	Low	1.27 ha	8.64	
	Pond (priority)		Two priority ponds will be retained within proposals and enhanced from poor to moderate condition.	Moderate	Low	0.01 ha	0.09	
	Pond (non-priority)		One non-priority pond will be retained within proposals and enhanced from poor to moderate condition.	Moderate	Low	0.03 ha	0.30	
	Modified grassland	Creation	Verges and small areas of lawn outside of private gardens.	Moderate	Low	0.75 ha	2.61	
	Other neutral grassland		A small area of meadow grassland created on previously developed land; sealed surface in the north of the Site.	Moderate	Low	0.17 ha	0.11	
	Mixed scrub		Areas of native tree and shrub planting.	Moderate	Low	0.63 ha	4.20	
	Mixed scrub		Areas of native shrub and bulb planting.	Poor	Low	0.04 ha	0.16	
	Introduced shrub		Areas of ornamental shrub planting.	n/a	Low	0.03 ha	0.06	
	Rain garden		Rain garden will be created in the north of Site.	Moderate	Low	0.08 ha	0.29	
	Vegetated garden		Private gardens.	n/a	Low	1.25 ha	2.42	
	Developed land; sealed surface		Housing and infrastructure.	n/a	Low	2.58 ha	0.00	
	Small urban trees		Planting of 157 small urban trees outside of private gardens.	Moderate	Low	0.64 ha	1.95	
	Total						20.84*	
	Hedgerow units		Line of trees	Retention	Retention of the existing line of trees.	Moderate	Low	0.065 km
		Native hedgerow	Creation	Extensive native hedgerow planting within the development.	Poor	Low	0.744 km	1.44
Total						1.70		

	HABITAT	INTERVENTION	DESCRIPTION	TARGET CONDITION	STRATEGIC SIGNIFICANCE	AREA / LENGTH	UNITS DELIVERED
Watercourse units	Ditches	Retention	Ditches 4 and 7 will be retained in their original condition.	Poor	Low	0.093 km	0.28
	Ditches	Enhancement	Ditch 1 will be enhanced from poor to moderate condition, and the riparian encroachment will be reduced from major/major to major/minor due to a change of management practices within the riparian zone.	Moderate	Low	0.241 km	1.51
	Ditches		Ditch 2 will be enhanced from poor to moderate condition, and the riparian encroachment will be reduced from major/none to none/none due to a change of management practices within the riparian zone.	Moderate	Low	0.191 km	1.43
	Ditches		Ditch 3 and 5 will be enhanced from poor to moderate condition. There is no change to the riparian encroachment status.	Moderate	Low	0.240 km	1.34
	Ditches	Creation	Ditch 6 will be retained, but due to an increase in riparian encroachment (from major/none to major/major as a result of a proposed bridge) it is shown as lost and created within the Metric.	Moderate	Low	0.187 km	0.63
	Total						5.19

**Rounding errors can lead to small discrepancies in the unit sums shown in this column.*

10. APPLICATION OF BNG PRINCIPLES

10.1 Table 4 provides an explanation of how the 10 key principles of Biodiversity Net Gain were applied to the project through the design process.

Table 4. Summary of the application of the key principles of Biodiversity Net Gain

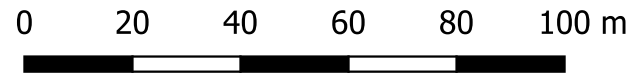
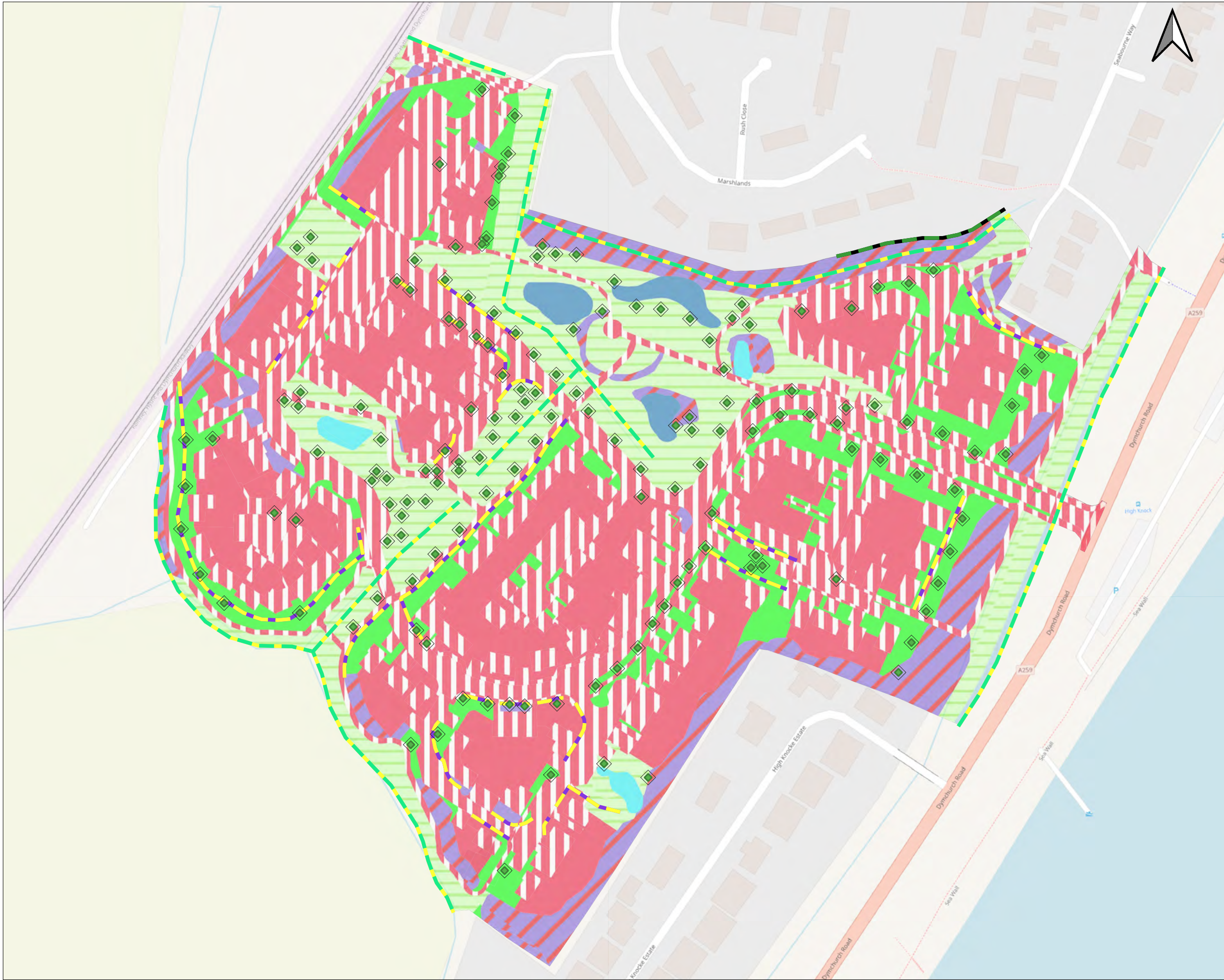
Principle 1: Apply mitigation hierarchy	Avoidance and minimisation <i>Impacts to medium-very high distinctiveness habitats should be avoided or reduced as far as possible as part of proposals.</i> No very high distinctiveness habitats are present within the Site. One high distinctiveness habitat is present: ponds (priority). All high distinctiveness habitat is retained within the Site. Three medium distinctiveness habitats are present within the Site: pond (non-priority), other neutral grassland and ditches. The ditches and pond are retained within the Site. Impact of riparian encroachment to ditches has been avoided where possible by providing a buffer of natural habitats and the use of ditches that clear span the ditches. Where possible other neutral grassland has been retained and enhanced, however the loss of this habitat is unavoidable to facilitate construction within this Site. Compensation <i>Where impacts cannot be avoided, compensation will be required to achieve net gain. This compensation should include habitats of the same or higher distinctiveness.</i> The impact of increased riparian encroachment to D6 has been compensated by enhancement of ditches D1, 2, 3 and 5. The loss of 20.99 units of other neutral grassland has been compensated on-site where possible through the retention and enhancement of areas of grassland within open space. A deficit of 17.32 units remains and will be compensated through the purchase of off-site units.
Principle 2: Avoid losing biodiversity that cannot be offset by gains elsewhere	There are no irreplaceable habitats within the Site.
Principle 3: Be inclusive and equitable	Net gain has been achieved in partnership with project stakeholders, through liaison regarding how and where habitats are created and enhanced within the Site.

Principle 4: Address risks	Spatial risks Spatial risks have been reduced by maximising biodiversity units generated within the Site boundary. The unit deficit will be compensated through the purchase of off-site units generated within the LPA/NCA if possible. Habitat failure Created habitats will be monitored to reduce the risk of failure. All planting will be replaced in the case of any failures.
Principle 5: Make a measurable net gain contribution	Calculations predict an on-site gain in excess of 10% for both watercourse and hedgerow units (see Section 12) and the trading rules are satisfied. The purchase of 17.23 units of other neutral grassland to satisfy the trading rules for habitats will produce a net gain in excess of 10%.
Principle 6: Achieve the best outcomes for biodiversity	Landscape outcomes No local biodiversity strategy is available, however any created habitats should take into consideration the priorities of the Kent Nature Partnership Biodiversity Strategy (Kent Nature Partnership, 2020). Priority habitats listed include: ponds, lowland beech and yew woodland, lowland mixed broadleaved woodland, chalk grassland, lowland meadow, lowland dry acid grassland/ lowland heathland, hedgerows, brownfield and traditional orchard. Of these, ponds and hedgerow are suitable for creation/ enhancement within the Site. <i>Hedgerow</i> Proposals include 744m of native species hedgerow creation. <i>Ponds</i> Three ponds are present within the Site. These will be retained by proposals and it is recommended that they are enhanced through removal of invasive species, suitable aquatic planting and deepening so that they hold water for a longer period of the year. Local outcomes Created and enhanced habitats should be considered as part of the opportunities and constraints detailed within the Ecological Impact Assessment (EcIA), protected species survey results and associated mitigation and enhancement requirements. During the EcIA the following species were identified as present/potentially present within the Site: foraging and commuting bats, badger, hedgehog, nesting birds, reptiles and great crested newt. <i>Scrub, urban trees and hedgerows</i> Planting of scrub, urban trees and creation of hedgerows will benefit a number of these species, including bats, hedgehog and a number of birds listed as 'Red' and 'Amber' on the list of Birds of Conservation Concern (such as wren, song thrush, dunnock and yellowhammer) by improving commuting corridors and providing additional foraging and nesting opportunities.

Principle 6: Achieve the best outcomes for biodiversity (continued)	<i>Ponds and ditches</i> Great crested newt are known to be present within the Site. The retention and enhancement of pond and ditches within the Site will provide habitat for a variety of semi aquatic species including common toad and great crested newt (Species of Principal Importance). In addition, ponds and ditches provide aquatic habitat for a wide range of plants and invertebrates and are an essential resource for many terrestrial species.
Principle 7: Be additional	Biodiversity net gain is intended to add value to existing habitats. Therefore mitigation and compensation required for protected species outside of the Site can only contribute towards achieving net zero. On-site mitigation, for example the proposed mitigation for water vole, can contribute to net gain. A District Level Licence will be obtained to provide off-site compensation for any impacts to great crested newt. No further specific off-site mitigation is required for protected species and therefore all habitat creation can contribute towards net gain.
Principle 8: Create a net gain legacy	A Landscape and Ecological Management Plan (LEMP) should be produced to detail the ecological enhancements, together with habitat management prescriptions, to be included as part of development proposals, together with appropriate monitoring. Created and enhanced habitats will be safeguarded, managed and monitored as appropriate for at least 30 years.
Principle 9: Optimise sustainability	<i>Optimise the wider environmental benefits for a sustainable society and economy.</i> To optimise sustainability within the Net Gain Plan, measures will include: • Use of locally sourced plants/ seed mixes to reduce carbon footprint. • Planting of trees and hedgerow which will increase carbon storage potential and reduce heat island effect.
Principle 10: Be transparent	The Biodiversity Net Gain assessment has been recorded and shared with stakeholders throughout the process, resulting in this Biodiversity Gain Plan report, which includes the decision making processes and justification for habitat enhancement and creation measures.

11. POST DEVELOPMENT HABITAT PLAN

See overleaf



Legend

- Proposed Small Urban Tree
- Line of trees
- Native hedgerow
- Ditches
- Developed land; sealed surface
- Introduced shrub
- Mixed scrub
- Modified grassland
- Other neutral grassland
- Ponds (non-priority habitat)
- Ponds (priority habitat)
- Watercourse footprint
- Rain garden
- Vegetated garden



PROMOTING BIODIVERSITY INTEGRATION

Biodiversity Net Gain Post-intervention Habitat Plan

High Knocke Farm
Dymchurch
Kent

Drawing ref:	0463_DR03
Revision:	-
Date:	24/01/2024
Scale:	1:1400
Paper size:	A3

12. RESULTS

BIODIVERSITY METRIC 4.0 CALCULATIONS

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

HEADLINE RESULTS

- 12.2 The metric shows that development proposals result in a **-20.94% loss** in the biodiversity value of habitat units, a **552.28% gain** in the biodiversity value of hedgerow units and a **40.74% gain** in the biodiversity value of watercourse units.
- 12.3 Table 5 shows the overall results of the assessment. The full results can be viewed in the Statutory Metric Calculation Tool.

Table 5. Overall change in biodiversity units

	BASELINE UNITS	POST DEVELOPMENT UNITS	NET CHANGE
Habitat units	26.36	20.84	-20.94%
Hedgerow units	0.26	1.70	+552.28%
Watercourse units	3.69	5.19	+40.74%

TRADING SUMMARY RESULTS

- 12.4 To achieve biodiversity net gain, loss of habitats of medium-very high distinctiveness must be offset according to the following habitat trading rules:
- Loss of medium distinctiveness habitats must be offset with habitat creation of the same broad habitat type (e.g. grassland, woodland etc.) or a habitat of higher distinctiveness.
 - Loss of high distinctiveness habitat must be offset with like for like habitat creation.
 - Loss of very high distinctiveness habitat is likely to require bespoke compensation.
- 12.5 The trading summary results show that there is a deficit of 17.32 units of other neutral grassland (medium distinctiveness habitat).

UNIT PURCHASE

- 12.6 To achieve net gain and satisfy the trading rules, a minimum of 17.32 units of other neutral grassland will be purchased from a 3rd party supplier. Cost per unit for other neutral grassland is currently estimated to be approximately £23,500.
- 12.7 Should no units be available for purchase, statutory credits can be purchased. The cost per unit of other neutral grassland is £84,000.
- 12.8 The purchase of 17.32 units will result in a net gain of approximately 44% for habitat units.

13. REFERENCES

- CIEEM (2019). Biodiversity net gain. Good practice principles for development. A practical guide.
- CIEEM (2021). Biodiversity Net Gain Report & Audit Templates. Version 1.
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- Native Ecology (2024d). 0463_A2_Metric.
- Defra (2023). The Statutory Biodiversity Metric Draft User Guide. November 2023.

14. APPENDIX 1: BIODIVERSITY NET GAIN GOOD PRACTICE PRINCIPLES AND GUIDELINES

14.1 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

14.2 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

- 14.3 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

- 14.4 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 timeframe.

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

14.5 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.

15. APPENDIX 2: HABITAT DEFINITIONS AND MANAGEMENT

Table 4. Habitat creation definitions and recommendations

Habitat Type	Definition	Management
Small urban tree	The diameter of the tree at breast height (DBH) is less than 30cm at the time of planting.	Planting of semi-mature trees will ensure that the DBH size is reached in 30 years. To achieve moderate condition, the trees should be native species and planted so that they over-sail vegetation. Pruning should be minimised. Any failed tree planting should be replaced.
Other neutral grassland	Grassland containing 8+ species, per m ² including a good percentage of herbs and sedges, and less than 30% cover of perennial ryegrass and white clover.	Areas of wildflower meadow should be sown with appropriate seed mix for the soil type, for example Emorsgate Meadow Mixtures EM1-EM10. Seeding with a mixture that includes wild flowers will provide opportunities for pollinating insects. To achieve moderate condition the grassland should be managed with an appropriate mowing regime, any bracken, scrub or detrimental species should be annually removed by hand (for example creeping thistle) and any areas of bare ground should be re-seeded. To achieve good condition the grassland must also exceed 9 species per m ² .
Modified grassland	Grassland containing fewer than 9 species per m ² with a high percentage of perennial ryegrass, Timothy grass and white clover.	Grassland should be sown with a hardy seed mix appropriate for the intended usage. To achieve moderate condition, a flowering lawn mix should be used to increase the species diversity. Growth of scrub, bracken or invasive non-native species should be removed annually and any areas of bare ground should be re-seeded.
Rain garden	Shallow depression planted with deep rooted plants and grasses, located near a runoff source to capture rainwater.	To achieve moderate condition, the rain garden should be planted with a diverse range of suitable native species, providing a variety of ecological niches for invertebrates. Any growth of invasive species or scrub should be removed annually.
Pond (priority or non-priority)	A feature designed to manage surface water.	The three ponds within the Site will be enhanced. To achieve moderate condition the ponds will be deepened so that they hold water year round. Invasive Australian stone crop will be removed. Water quality will be improved in the absence of the current agricultural management. A variety of native submerged, floating and marginal species will be encouraged to establish through planting and natural colonisation.

Habitat Type	Definition	Management
Mixed scrub	Dense scrub comprising a mixture of species.	To achieve moderate condition at least three native woody species will be planted. Species could include hazel, hawthorn, spindle, holly, yew, privet, field rose, dog rose and guelder rose. Invasive non-native plant species and species indicative of sub-optimal condition (such as nettles and thistles) will be managed annually.
Native hedgerow	A hedgerow containing 1-4 native woody shrub or tree species. The hedgerow must consist of 80% or greater native species.	Hedgerow should be planted with native woody shrubs, for example yew, hawthorn, blackthorn, hornbeam or hazel. The inclusion of fruiting and flowering species can provide additional foraging opportunities for wildlife. Given the nature and location of hedgerow they have been given a target condition of poor. However, to improve the condition the hedgerows should be managed with pruning so that the canopy is thick and there is little or no gap between the canopy and the ground, maintained (once established) at a minimum of 1.5m high and 1.5m wide and re-planted as necessary to prevent gaps forming. Any invasive species should be removed annually.
Ditch	A man-made, linear water conveyancing feature.	To achieve moderate condition within the enhanced ditches, they will be deepened so that they hold water year round and invasive Australian stone crop will be removed. Water quality will be improved in the absence of the current agricultural management. A variety of native submerged, floating and marginal species will be encouraged to establish through planting and natural colonisation.