SEVINGTON
INLAND BORDER FACILITY

Biodiversity Net Gain Report

March 2025

Client Name:	Department for Transport (DfT), His Majesty's Revenues & Customs (HMRC) and Department for Environment, Food and Rural Affairs (DEFRA)
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This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

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P2	S3	March 2025	[redacted] Senior Ecologist	[redacted] Principal Ecologist	[redacted]
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Comments

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Revision		Status	
P*nn*	Preliminary (shared; non-contractual)	S1	Coordination
C*nn*	Contractual	S2	Information
		S3	Review & Comment
		S4	Review & Authorise
		S5	Review & Acceptance
		A0, A1, A*n*	Authorised & Accepted (*n*=work stage if applicable)

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1. Introduction

1.1 Waterman Infrastructure & Environment Ltd (hereafter referred to as 'Waterman') was commissioned by Department for Transport (DfT), His Majesty's Revenues and Customs (HMRC), and Department for Environment, Food and Rural Affairs (DEFRA) (hereafter referred to as 'the Applicants') to undertake a Biodiversity Net Gain (BNG) Assessment at the existing Inland Border Facility and Border Control Post (collectively referred to as the 'IBF') at Sevington near Ashford in Kent, TN25 6GE (hereafter referred to as 'the Application Site').

1.2 The Application Site covers an area of approximately 48 hectares (ha) and is centred on National Grid Reference TR 03976 40758. The Application Site is bound by the A2070 Link Road and M20 motorway (M20 Junction 10a) to the north, Highfield Lane and Kingsford Street to the east, Highfield Lane and Church Road to the south and Church Road and A2070 (Bad Munstereifel Road) to the west.

1.3 The Application Site is located within a semi-rural area on the outskirts of Ashford. Land uses in the wider area are varied in character, being primarily open and agricultural land, with scattered farms and dwellings to the north-east through to the south, and a mixture of industrial, commercial and residential development to the south-west and west. Areas to the north-west and north of the Application Site, are primarily residential.

1.4 A planning application is required to make the temporary IBF permanent with no additional development required (hereafter referred to as the 'Scheme')

1.5 As such, it is determined that given no new development is proposed as part of this forthcoming planning application for the Application Site, the *de-minimis* exemption is applicable, meaning that a mandatory BNG assessment would not be necessary to accompany the planning application for the permanent installation of the IBF. Therefore, this BNG assessment is a voluntary submission as part of the planning application (refer to paragraphs 1.7 to 1.9).

Previous BNG

1.6 Sevington IBF was originally granted via Special Development Order (SDO) for a temporary period of 5 years, up to 31st December 2025. As part of this application, a BNG 3.0 Metric was undertaken by Mott MacDonald and included in the Biodiversity Assessment[1] submitted as part of the SDO application, in advance of BNG becoming mandatory on the 12th February 2024, under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The previous BNG metric was based on a different redline, which included an area east of Highfield Lane that would now be considered to be part of Sevington East. The BNG uplift confirmed an increase of 75.70% across Sevington West (now known as the Application Site) and part of Sevington East (the area to the east of Highfield Lane) which is located immediately adjacent to the eastern boundary of the Application Site, covering a combined area of 83.78 ha.

Consultation

1.7 Waterman has undertaken consultation with JLL, and the applicants to determine the BNG approach, and as such it is determined that given no new development is proposed as part of this forthcoming planning application for the Application Site, the *de-minimis* exemption is applicable, meaning that a mandatory BNG assessment would not be necessary to accompany the planning application for the permanent installation of the IBF.

[1] Mott MacDonald (2020), Sevington Inland Border Facility, Biodiversity Assessment (Ref. 419419/419419-MMD-XX-MO-RP-BD-0001/PO2).

1.8 However, for the applicants to secure the landscaping/BNG that will be implemented across Sevington East pursuant to the 2023 LEMP[2] attached to the SDO and demonstrate compliance with the Local Plan, as well as respond to related resident and officer concerns, it is proposed to prepare a voluntary retrospective BNG assessment. This will include the completion of an on-site BNG assessment (using the Statutory Metric) of the Application Site as per the LEMP 2020 design, and an additional off-site BNG assessment (including land outside of the redline planning boundary) on Sevington East as per the 2023 LEMP design. This off-site land provides an additional public benefit to be secured through the planning consent via a Section 106 or similar legal agreement. This would legally protect the BNG uplift achieved via the 2023 LEMP for Sevington East (off-site gain) for a period of 30 years. This would naturally provide the longer-term protection from development that communities seek. The 30-year habitat management and maintenance period will likely start once all the habitat enhancement works are completed.

1.9 This BNG is run based on the assumption that the permanent installation of the IBF is implemented. However, should the full planning application not be granted then it is noted that the Application Site would be reinstated. In this case, this would not encompass the complete reinstatement of the Site to its former use (i.e. agricultural land). The reinstatement would involve the removal of all built infrastructure on the Site as permitted under Article 3(1) of the SDO, including all buildings, cabins, fencing (including acoustic and security fencing) and lighting. The only elements that would be retained on the Site would be the previous IBF hardstanding (sealed surface) areas, the drainage system, including all SuDs ponds, and the landscaping, including all bunds and the habitats created within the Sevington East land off-site. This would not change the outcomes of the findings of this BNG assessment due to the sealed surface area would remain the same.

Aims and Objectives

1.10 This report presents the losses and gains in biodiversity units as a result of the Scheme. The report details the assumptions that have been made to inform the calculations. The calculations are based on the current Landscape Plans (Ref: 419419-MMD-01-MO-DR-L-3031[3] and Ref: 419419-MMD-01-MO-DR-L-3206[4]) which can be found in **Appendix A**.

1.11 The purpose of this report is to:

- Calculate the on-site BNG based on the existing LEMP for the Application Site alone;
- Calculate the off-site BNG in combination with the on-site BNG to calculate the overall BNG achievable based on the existing LEMP for the Sevington East Site.

[2] Mott MacDonald (2020) Sevington Inland Border Facility Landscape and Environmental Management Plan

[3] Mott MacDonald (2020) Sevington Inland Border Facility Landscape and Environmental Management Plan
[4] Mott MacDonald (2023) Land East of Highfield Lane, Landscape and Ecological Management Plan

2. Methodology

Guidance

2.1 This BNG assessment has been completed using the Statutory Biodiversity Metric Calculation Tool (hereafter referred to as the 'Metric')[5] and The Statutory Biodiversity Metric User Guide[6] (hereafter referred to as 'the User Guide'). The Metric generates a value measured in 'biodiversity units' for a site before development commences (referred to as the 'Baseline') and after development is completed (referred to as 'post-intervention'). The difference (positive or negative) between the two values is the output, and provided as a percentage change.

Statutory Biodiversity Metric

2.2 This assessment has been completed using the Statutory Biodiversity Metric Calculation Tool (the Metric). The Metric generates a value measured in 'biodiversity units' for a site before intervention commences (referred to as the 'Baseline').

2.3 The Metric assesses habitat parcel units, including individual trees, separately from linear habitat units which are split into either hedgerows (including line of trees) or watercourses (including streams, canals and culverts). Area habitats are measured in hectares, whereas linear habitats are measured in kilometres.

2.4 The Metric calculates an output based on the habitat parcel area and linear habitat lengths (hedgerow and watercourse units), distinctiveness and a range of factors that are associated with their assessed condition. The generated biodiversity value is based on the above factors that are multiplied together. These are detailed in **Table 1**. These factors are based on the information collected as part of the desk based and field based ecological surveys for the Baseline status, and on the proposed intervention methods (i.e. loss of, retention of, enhancement or creation/restore) for the Future Baseline status.

Habitat Parcels (Area Habitats)

2.5 Habitats were separated into discrete parcels either where they were geographically discrete or where there was a change in habitat condition across a single location within and between the sites. Each parcel was recorded and calculated separately using the Metric. Urban trees are counted as habitat parcels (area habitats), although the method for calculating area is different to other habitat parcels, this id described below.

2.6 Urban tree area is defined differently than habitat parcels. For individual trees, not including lines of trees or woodland, the area is calculated from stem diameter which equates to size (small, medium, large or very large). Full details of how this is calculated is defined within the User Guide. The number of individual trees of each size is then input to the 'Urban Tree Helper' table within the Metric, and an area is given which is inputted to the Metric as a habitat parcel (area habitats) along with each of the factors listed in **Table 1.**

2.7 It should be noted that within the Metric, some UK Hab classifications are not captured within the metric habitat types. As such, 'best fit' categories were applied that represent an appropriate distinctiveness criterion.

2.8 No watercourses were noted on the Application Site, as such the methodology associated with recording watercourses for the purpose of BNG assessment is not included in this report.

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5 DEFRA (2024) The Statutory Biodiversity Metric Calculation Tool, GOV.UK. Available at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

6 DEFRA (2023) The Statutory Biodiversity Metric: User Guide (draft). (available at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides)

2.9 **Table 1** sets out the methodology and description of factors for the onsite baseline habitats and watercourses.

Table 1: Methodology for assessing factors within the Metric for Baseline

Factor	Baseline
Habitat type	Habitat types were recorded and mapped using the Phase 1 habitat classification system, and this has been translated into UK Habitat Classification[7] using the Phase 1 Translation tool within the BNG Metric (as shown on the Habitat Baseline figures).
Area	All habitats were separated into parcels: geographically discrete or a change in habitat condition across a single location. Each parcel was recorded and calculated separately within the Metric. Areas were calculated in hectares to two decimal places using digital mapping in ArcGIS[8]. Each watercourse or associated feature was separated into 'reaches': lengths of watercourse which are geographically discrete and have the habitat condition across a single location. Each reach was recorded and calculated separately within the Metric. The length of each linear habitat and watercourse and associated feature is measured in km.
Distinctiveness	Distinctiveness value is automatically generated by the Metric based on habitat type. Habitats are defined as Very Low, Low, Medium, High or Very High. More information surrounding specific criteria for assessing distinctiveness can be found in **Appendix C.**
Condition	Habitat condition is a score based on the quality of the habitat, judged against the perceived ecological optimum state for that particular habitat. It is, therefore, a means of measuring variation in the quality of patches of the same habitat type rather than a measure of quality between habitat types. The 'condition assessment'[9] involves assessing each habitat type / parcel against criteria in the associated condition sheet, resulting in a condition score (Good, Moderate or Poor) which is then input into the Metric. Intermediate condition categories (such as fairly good and fairly poor) should be explained by ecological reasoning and explain any deviations against specific condition criterion. Some intensively managed habitats have a pre-defined condition score; and for other very low distinctiveness habitats no assessment is required. A condition assessment was carried out during the UKHab field survey. Some intensively managed habitats have a pre-defined condition score of 'Poor'; and for other very low distinctiveness habitats no assessment is required.

[7] UKHAB Ltd (2023). Version 2.0 (at ukhab – UK Habitat Classification).

[8] ESRI. ArcGIS online https://www.arcgis.com/index.html

[9] DEFRA (2023) Statutory biodiversity metric condition assessments: The Statutory Biodiversity Metric -Technical Annex 1: Condition Assessment Sheets and Methodology

Factor	Baseline
Time to Target Condition and Advanced/Delay Action	The temporal risk multiplier represents the average time lag between the start of habitat creation or enhancement works and the target outcome. This is known as 'time to target condition'. Time to target condition is measured in years. The temporal risk multiplier is automatically applied by the biodiversity metric and changes depending on data input. The temporal risk multiplier should be adjusted to account for to account for any time difference between the loss and compensation, 'Advanced action' refers to where habitat is created in advance of the habitat loss, for example where habitat banking is used. In this instance the number of units created is *increased* as number of years the habitat is created in advance of clearance of the habitat on-site is populated in the Metric. 'Delay action' is where there is a delay in starting habitat creation or enhancement. This refers to where there is a time lag between habitat loss and habitat creation. In this instance the number of units created is *reduced* as the number of years the habitat is absent is populated in the Metric. For the purpose of the assessment, it is assumed that there is no lag between habitat loss (on an allocated development) and habitat gain on the site. However, there is clear benefit to the number of units that can be created at each site if there is advanced action (i.e. if the sites are enhanced through habitat banking).
Strategic Significance	Strategic significance utilises relevant published documents to identify local priorities for targeting biodiversity and nature improvement. It works at a landscape scale and gives additional unit value to habitats that are in preferred locations for biodiversity and other environmental objectives. Kent County Council has not yet published Local Nature Recovery Strategy (LNRS). In accordance with the guidance set out within the User Guide, the following strategic documents have been utilised, to determine the strategic significance of the habitats identified within the nine sites: Local Planning Authority Local Ecological Networks Biodiversity Action Plans Species conservation and protected sites strategies Ashford Local Plan 2030 Strategic significance has been defined as below: High strategic significance has been assigned to habitats described as locally ecologically important within a specific location, within the strategic documents specified above. Medium strategic significance has been assigned to habitats which are ecologically important within a specific location but have not been included within the strategic documents specified above. Low strategic significance has been assigned to habitats which are not considered ecologically important, are not described within nor deliver the specific actions outlined within the strategic documents specified above. More information surrounding specific criteria for assessing strategic significance can be found in **Appendix D.**

Irreplaceable Habitats

2.10 Impacts on 'irreplaceable' habitats[10] cannot be accounted for through the Metric. They require separate consideration which must comply with relevant policy and legislation. Data relating to these habitats can be entered into the Metric to (i) give an indication of the biodiversity value of the habitats present on a site (the Baseline), and/or (ii) allow actions to enhance or restore these important habitats to contribute towards the delivery of net gain. Retaining or enhancing any irreplaceable on site is encouraged and should be recorded in the metric calculations counting towards the net gain. The metric can also be used to give an indication of the minimum amount of replacement habitat that should be provided, however, it cannot and should not replace case specific assessments, and bespoke compensation should be agreed with the relevant decision maker for any losses or impacts to these habitats.

10 The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 (publishing.service.gov.uk)

2.11 The National Planning Policy Framework (NPPF) defines irreplaceable habitats as[11] 'habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen'.

2.12 The current list of irreplaceable habitats are as follows[12]:

- Ancient woodland
- Ancient and veteran trees
- Blanket bog
- Limestone pavements
- Coastal sand dunes
- Spartina saltmarsh swards
- Mediterranean saltmarsh scrub
- Lowland fens

2.13 No irreplaceable habitats were identified within the Applicant Site.

Trading Rules

2.14 For each habitat lost at the Baseline through the proposed Development, it must be replaced by a 'like-for-like' habitat of the same / higher, broad type / distinctiveness. This is referred to as 'Trading Rules', a full definition of which is provided within the User Guide. The type of trading depends on the distinctiveness of habitat lost, for example Very Low distinctiveness habitat will not require trading, however Very High distinctiveness habitat will require bespoke compensation agreed with relevant authorities and High distinctiveness habitat must be replaced with habitat of the same distinctiveness or above.

Assumptions and Limitations

2.15 Although the Site survey was conducted outside of the optimal season for a UK Habitat Classification Survey (April-September) when the majority of plant species are visible, the timing of the survey was considered suitable given the context of the Site within its surroundings and the habitats it supports. All plants were identified through their floristic (where possible) and vegetative characteristics.

2.16 It has been assumed that the new landscaping within the assessment boundary will be subject to a management regime of a minimum of 30 years or an alternative period to be agreed with the Local Planning Authority in accordance with current best practice guidance. This would be secured by way of a planning condition/obligation.

2.17 In the absence of detailed plans, the proposed habitats have been condition assessed as being poor, unless an existing example of this habitat on site has been assessed as being moderate, to adopt a 'worst-case scenario' approach.

2.18 In the absence of detailed plans, the sizes of proposed trees are categorised as being 'Small' or 'Large' as detailed on the LEMP and have been condition assessed as poor to adopt a 'worst-case scenario' approach.

11 National Planning Policy Framework (publishing.service.gov.uk)

12 The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 (legislation.gov.uk)

3. BNG Assessment

On site Baseline

Habitat Baseline

3.1 **Table 2** details the baseline habitat units for the Application Site before it was subject to the temporary IBF development. This is shown in Figure 1.

Table 2: On-Site Habitat Baseline Units

Habitat	Area (ha)	Habitat Distinctiveness	Habitat Condition	Baseline Habitat Units
Modified grassland	4	Low	Moderate	16.00
Other woodland: Broadleaved	0.02	Medium	Good	0.26
Mixed Scrub	0.46	Medium	Poor	1.84
Ruderal/Ephemeral	0.8	Low	Poor	1.60
Ponds (non-priority)	0.03	Medium	Good	0.36
Cereal Crops	42.69	Low	N/A	85.38
Total	**48.00**	**-**	**-**	**105.44**

Hedgerow Baseline

3.2 **Table 3** details the baseline Hedgerow baseline units for the Site. This is shown in Figure 1.

Table 3: On-Site Hedgerow Baseline Units

Habitat	Length (km)	Habitat Distinctiveness	Hedgerow Condition	Baseline Hedgerow Units
Native hedgerow	1.57	Low	Moderate	7.22
Native hedgerow	0.79	Low	Moderate	3.63
Species-rich native hedgerow	0.83	Medium	Good	11.45
Line of trees	0.1	Low	Moderate	0.40
Total	**3.29**	-	-	**22.71**

Habitat Loss

3.3 **Table 4** details habitat units retained and lost by the Development.

Table 4 On Site Habitat Losses Scores

Habitat	Area (ha) retained	Area (ha) lost	Habitat Distinctiveness	Habitat Condition	Habitat Units Lost
Modified grassland	0.00	4	Low	Moderate	16.00
Other woodland: Broadleaved	0.00	0.02	Medium	Good	0.26
Mixed Scrub	0.00	0.46	Medium	Poor	1.84
Ruderal/Ephemeral	0.00	0.8	Low	Poor	1.60
Ponds (non-priority)	0.00	0.03	Medium	Good	0.36
Cereal Crops	4.236	38.454	Low	N/A	76.91
Total	**4.236**	**43.754**	**-**	**-**	**96.97**

Hedgerow Losses

3.4 Table 5 details the baseline Hedgerow baseline units for the Site.

Table 5: On Site Hedgerow Losses Scores

Habitat	Length (km) retained	Length (km) lost	Habitat Distinctiveness	Hedgerow Condition	Hedgerow Units Lost
Native hedgerow	1.57	0.00	Low	Moderate	0
Native hedgerow	0.79	0.00	Low	Moderate	0
Species-rich native hedgerow	0.83	0.00	Medium	Good	0
Line of trees	0.1	0.1	Low	Moderate	0.4
Total	**3.29**		-	-	**0.4**

On site Habitat Creation

Habitat creation

3.5 **Table 6** details habitat units created by the Development with the current hardstanding occupied by the existing IBF retained as a permanent facility. This is shown in **Figure 2**.

Table 6 Habitat Creation Scores – permanent IBF

Habitat	Area (ha)	Habitat Distinctiveness	Habitat Condition	Habitat Creation Units
Modified grassland	6.072	Low	Moderate	21.06
Mixed Scrub	4.026	Medium	Moderate	26.95
Other neutral grassland	5.493	Medium	Poor	20.46
Lowland meadows	0.898	V. high	Poor	1.98
Ponds (non-priority)	2.018	Medium	Poor	7.79
Developed land; sealed surface	25.139	V. low	N/A - Other	0.00
Individual Trees*	0.358292359	Medium	Poor	1.00
Sustainable drainage system	0.118	Low	Poor	0.15
Total	**44.12**	**-**	**-**	**79.41**

*Individual trees are classified as area habitat within the BNG metric. The area of habitat creation for the Application Site would be 43.76 excluding individual trees. The inclusion of urban trees increases the total area of habitat created to 44.12ha.

Hedgerow creation

3.6 Table 7 details the baseline Hedgerow baseline units for the Site. This is shown in Figure 2.

Table 7: Hedgerow Creation Units

Habitat	Length (km)	Habitat Distinctiveness	Hedgerow Condition	Baseline Hedgerow Units
Native hedgerow	0.04	Low	Moderate	0.15
Species-rich native hedgerow with trees	1.4	High	Moderate	13.53
Total	**1.44**	-	-	**13.68**

On site Net Gain

With the retention of the IBF as a permanent facility, the Application Site has an overall prediction of **-16.66% net change for habitats, and +58.49% net gain for hedgerows**.

Off-site baseline

Habitat Baseline

3.7 Table 8 details the baseline habitat units for off-site (Sevington East). This is shown in Figure 1.

Table 8: Off-Site Habitat Baseline Units

Habitat	Area (ha)	Habitat Distinctiveness	Habitat Condition	Baseline Habitat Units
Cereal Crops	39.898	Low	N/A	79.80
Total	**39.898**	**-**	**-**	**79.80**

Habitat Losses

3.8 **Table 9** details the baseline habitat unit losses for off-site (Sevington East).

Table 9: Off-Site Habitat Baseline Units

Habitat	Area (ha) retained	Area (ha) lost	Habitat Distinctiveness	Habitat Condition	Habitat Units lost
Cereal Crops	0.00	39.898	Low	N/A	79.80
Total		**39.898**	**-**	**-**	**79.80**

Off-site Habitat creation

3.9 **Table 10** details the baseline habitat unit created off-site (Sevington East). This is shown in **Figure 3.**

Table 10 Habitat Creation Scores

Habitat	Area (ha)	Habitat Distinctiveness	Habitat Condition	Habitat Creation Units
Mixed Scrub	4.96	Medium	Moderate	33.21
Other neutral grassland	34.094	Medium	Poor	127.00
Lowland meadows	0.839	V. high	Poor	1.85
Individual Trees*	1.506	Medium	Poor	4.22
Total	**41.40**	**-**	**-**	**166.28**

*Individual trees are classified as area habitat within the BNG metric. The area of habitat creation for the Application Site would be 39.9 excluding individual trees. The inclusion of urban trees increases the total area of habitat created to 41.40 ha.

Offsite Net Gain

3.10 The area known as Sevington East has an overall prediction of **+108.38% net change for habitats.**

4. Total Net Gain Summary

4.1 The total net gain from the Application Site, based on the retention of the IBF as a permanent facility would result in a **net change of -16.66% for habitats, and +58.49% net change for hedgerows.**

4.2 The total net gain from both the Application Site and Sevington East would be a **positive net change of +65.35.% for habitats, and +58.49% net change for hedgerows.** This net gain is based on the overall habitat unit uplift, when compared to the on-site habitat unit baseline.

4.3 Where any on site 'significant[13]' habitat enhancement or creation is considered, this will need to be safeguarded, managed, and monitored for a period of at least 30 years, and detailed within a Habitat Management and Monitoring Plan (HMMP) to be agreed by the Local Planning Authority. All offsite improvements to address the BNG shortfall on site would need to be subject to a 30 years HMMP.

13 Assessment of whether habitat enhancement or creation is considered significant is determined through consultation with the Local Planning Authority.

Figures

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- Planning Application Boundary
- Land Ownership Boundary
- c1c - Cereal crops
- g4 - Modified grassland
- h3h - Mixed scrub
- u1b - Developed land; sealed surface
- s - Sparsely vegetated land, Ruderal/ Ephemeral
- h2 - Hedgerow

N

0 20 40 80 120 160 200 m

Project Details	WIE20982-103: Sevington
Figure Title	Figure 1: Baseline Habitats
Figure Ref	20982103-WAT-XX-XX-GS-N-75101
Date	April 2025
File Location	N:\Projects\WIE20982-103\9_GIS\20982103-WAT-XX-XX-GS-N-75

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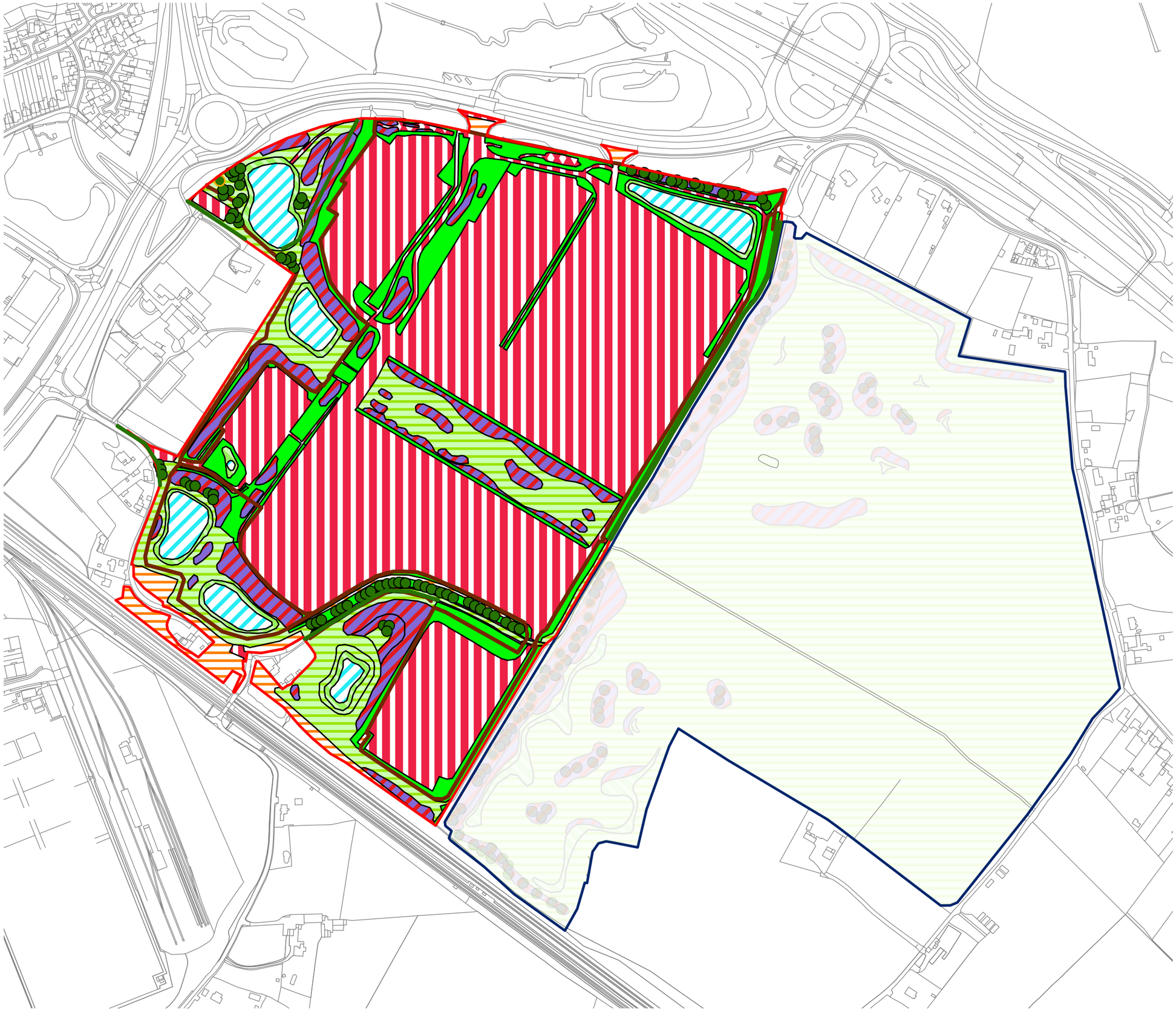

- Planning Application Boundary (43.655ha)
- Land Ownership Boundary
- g4 - Modified grassland (5.552ha)
- h3h - Mixed scrub (4.017ha)
- g3c - Other neutral grassland (5.542ha)
- g3a - Lowland meadows (0.898ha)
- r1g - Other standing water (2.018ha)
- u1b - Developed land; sealed surface (24.363ha)
- c1c - Cereal crops (1.147ha)
- u1b6 - Other developed land, SuDS (0.118ha)
- u1e - Built linear feature (4.032km)
- h2 - Hedgerow (1.484km)
- Small Tree (79No.)
- Large Tree (1No.)

N

0 20 40 80 120 160 200 m

Project Details	WIE20982-103: Sevington
Figure Title	Figure 2: Post Intervention Habitats On-Site
Figure Ref	20982103-WAT-XX-XX-GS-N-75102
Date	April 2025
File Location	N:\Projects\WIE20982-103\9_GIS\20982103-WAT-XX-XX-GS-N-75

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Project Details	WIE20982-103: Sevington
Figure Title	Figure 3: Post Intervention Habitats Off-Site
Figure Ref	20982103-WAT-XX-XX-GS-N-75103
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File Location	N:\Projects\WIE20982-103\9_GIS\20982103-WAT-XX-XX-GS-N-75

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Appendices

A. BNG Good Practice Principles

Table A1 Ten BNG Good Practice Principles[14]

Principle	Definition	Evidence
Principle 1. Apply the Mitigation Hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.	N/A to this assessment which focuses on habitat creation/enhancement.
Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere	Avoid impacts on irreplaceable biodiversity - these impacts cannot be offset to achieve No Net Loss or Net Gain.	N/A to this assessment which focuses on habitat creation/enhancement. No irreplaceable habitats were identified.
Principle 3. Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring, and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.	Assessment undertaken on behalf of TfL on TfL owned and managed land with regular engagement with the planning and green space teams with consideration of existing land uses.
Principle 4. Address risks	Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.	All enhancement opportunities provide detailed descriptions of baseline conditions and future enhancement scenarios that lay out difficulty of enhancement/creation per habitat type. A monitoring regime included to check habitats establish as predicted.
Principle 5. Make a measurable Net Gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.	The project as a whole only seeks to achieve measurable net gain across numerous habitats.
Principle 6. Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly-justified choices.	Survey lead is a competent botanist and who is local to the areas. Enhancement opportunities have not only been proposed in line with local knowledge.
Principle 7. Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).	Consultation with the green space team has allowed existing management regimes to be considered alongside proposals.
Principle 8. Create a Net Gain legacy	Ensure Net Gain generates long-term benefits by: • Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity;	All sites are on TfL- owned land to ensure feasibility of long term management. Consultation with the green space team identified ongoing land use activities (e.g. pond retention).

[14] CIEEM (2019) Biodiversity net gain. Good practice principals for development. London, UK

Principle	Definition	Evidence
	• Planning for adaptive management and securing dedicated funding for long-term management; • Designing Net Gain for biodiversity to be resilient to external factors, especially climate change; • Mitigating risks from other land uses; • Avoiding displacing harmful activities from one location to another; and • Supporting local-level management of Net Gain activities	
Principle 9. Optimise sustainability	Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	All enhancement opportunities have been proposed to increase the wider environmental benefits of each site and as a whole the area.
Principle 10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	This report will serve as a transparent evidence base for future decision making relating to BNG.

B. Legislation and Planning Policy Relevant to BNG

National Planning Policy Framework, 2024

The National Planning Policy Framework (NPPF) was published in 2012 and last updated December 2024[15]. Section 15 (outlined below) of the NPPF, 'Conserving and Enhancing the Natural Environment', is of relevance to this report. No significant changes to Section 15 are noted between the 2021[16] and 2024 update. The Government Circular 06/2005[17] - Biodiversity and Geological Conservation: Statutory Obligations and Their Impact within the Planning System, remains valid and is still referenced within the NPPF.

The NPPF encourages the planning system to contribute to and enhance the natural and local environment. This should be achieved by:

- *"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)*;
- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- *maintaining the character of the undeveloped coast, while improving public access to it where appropriate*;
- *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- *Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate".*

The NPPF also stipulates that Local Planning Authorities (LPAs), when determining planning applications, should apply the following principles:

- *"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;*
- *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- *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*
- *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity."*

[15] Department for Levelling Up, Housing and Communities (2023): National Planning Policy Framework.
[16] Ministry of Housing, Communities and Local Government. (2021): National Planning Policy Framework
[17] Department of Communities and Local Government (2005): Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.

National Planning Practice Guidance, 2024

The Government's National Planning Practice Guidance[18] (NPPG) is intended to provide guidance to local planning authorities and developers on the implementation of the planning policies set out within the NPPF. The guidance of most relevance to ecology and biodiversity is the Natural Environment Chapter, which explains key issues in implementing policy to protect biodiversity, including local requirements. In addition, to the biodiversity net gain guidance [19] which requires development to have a positive impact ('net gain') on biodiversity by delivering at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat.

Environment Act 2021 and Mandatory Net Gain

The Environment Bill was given Royal Assent in November 2021 and is now the Environment Act 2021. The Act includes a target to halt the decline of nature by 2030 and to strengthen the existing biodiversity duty through the introduction of a mandatory requirement to achieve at least 10% biodiversity net gain (BNG) for new developments in England. These requirements commenced on 12th February 2024. The BNG requirement is framed as a pre-commencement condition and that BNG information will need to be provided by the applicant as part of the planning application submission.

The act is supported by secondary legislation comprising six statutory instruments:

- The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024;
- The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2024;
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024;
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024;
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024;
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024; and,
- The Biodiversity Gain Site Register Regulations 2024.

Ashford Local Plan 2030

Ashford Local plan was adopted in 2019 and establishes a policy and delivery framework for the promotion, enhancement and protection of both the natural environment and provides clear and firm guidance to ensure that the Council's aims for the Ashford are achieved. It covers the period between 2011 and 2030. The relevant policies have been outlined below.

Green infrastructure plays an important role in supporting other policy areas of this Plan. By helping to create high quality environments which are attractive to businesses and investors it can drive economic growth and regeneration, deliver quality of life benefits and enhanced opportunities for recreation, social interaction and play in new and existing residential areas. Well-designed and managed green infrastructure can reinforce and enhance local landscape character, assist in halting the decline in biodiversity and mitigate the impact of climate change. In England, green infrastructure issues are dealt with through a combination of the planning system and legislation (European and national).

[18] Department for Communities and Local Government. (2024). *National Planning Practice Guidance. Available at: https://www.gov.uk/government/collections/planning-practice-guidance#full-publication-update-history*.

[19] Department for Communities and Local Government. (2024). *National Planning Practice Guidance. Available at: https://www.gov.uk/guidance/biodiversity-net-gain.*

Policy ENV1 – Biodiversity

Proposals that conserve or enhance biodiversity will be supported. Proposals for new development should identify and seek opportunities to incorporate and enhance biodiversity. In particular, development should take opportunities to help connect and improve the wider ecological networks.

Proposals should safeguard features of nature conservation interest and should include measures to retain, conserve and enhance habitats, including BAP (Priority) habitats, and networks of ecological interest, including ancient woodland, water features, ditches, dykes and hedgerows, as corridors and stepping stones for wildlife.

Development that will have an adverse effect on the integrity of European protected Sites, including the Wye and Crundale Special Area of Conservation and the Dungeness, Romney Marsh and Rye Bay Ramsar and SPA sites, alone or in combination with other plans or projects, will not be permitted. Any proposal capable of affecting designated interest features of European sites should be subject to Habitats Regulations Assessment screening.

Development that will have an adverse effect on nationally designated sites, including the borough's Sites of Special Scientific Interest and National Nature Reserves, will not be permitted unless the benefits, in terms of other objectives including overriding public interest, clearly outweigh the impacts on the special features of the site and broader nature conservation interests and there is no alternative acceptable solution.

Development should avoid significant harm to locally identified biodiversity assets, including Local Wildlife Sites, Local Nature Reserves and the Ashford Green Corridor as well as priority and locally important habitats and protected species. The protection and enhancement of the Ashford Green Corridor is one of the key objectives of the Plan and therefore all proposals coming forward within or adjoining the Ashford Green Corridor should comply with Policy ENV2 in the first instance.

Where harm to biodiversity assets cannot be avoided, appropriate mitigation will be required in line with a timetable to be agreed with the Local Authority. Normally any mitigation measures will be required to be delivered on-site, unless special circumstances dictate that an off-site model is more appropriate. A financial contribution - in lieu of on-site mitigation - will only be considered in very exceptional circumstances and where it is demonstrated that the proposed mitigation is deliverable and effective.

Opportunities for the management, restoration and creation of habitats in line with the opportunities identified for the Biodiversity Opportunity Areas (BOAs) and targets set out in the Kent Biodiversity Strategy will be supported.

Biodiversity Action Plans

UK Biodiversity Framework 2024

The UK Biodiversity Framework (UKBF) was published in May 2024 and supersedes the previous Framework (the UK Post-2010 UK Biodiversity Framework), which was developed following agreement of the Convention on Biological Diversity (CBD) Strategic Plan for Biodiversity 2011-202 and the 'Aichi targets'.

The UKBF has been developed in response to the Kunming-Montreal Global Biodiversity Framework (GBF), agreed at the Fifteen Conference of the Parties of the CBD in December 2022. The UKBF has been produced through the Four Countries' Biodiversity Group which is the lead governance body for the UKBF, and which includes representatives from DAERA, Defra, Scottish Government, and Welsh Government, with JNCC providing an independent secretariat role.

Through the UKBF the four countries will agree on activities where joint action between the four countries is required to implement the GBF.

Local Biodiversity Action Plan

As part of the action plan process, Local Biodiversity Action Plans (LBAPs) have been produced by most Councils in the UK. The Site is covered by the Kent Biodiversity Strategy (KBS) 2020 to 2045. This document identifies habitats and species of importance locally and contains local targets relevant for planning and mitigation within Kent.

C. Habitat Distinctiveness

Table A2 Habitat Distinctiveness (Please note this is auto populated in the Metric[20])

Category	Scores	Description
Very High	8	• Priority habitats as defined in Section 41 of the Natural Environment and Rural Communities (NERC) Act that are highly threatened, internationally scarce and require conservation action, e.g. blanket bog. • Small amount of remaining habitat with a high proportion unprotected by designation. • Endangered or Critical European red list habitats.
High	6	• Priority habitats as defined in Section 41 of the NERC Act requiring conservation action, e.g. lowland fens. • Remaining Priority Habitats not in very high distinctiveness band & other red list habitats
Medium	4	• Semi-natural habitats not classed as a Priority Habitat but with a significant wildlife benefit e.g. mixed scrub • One Priority Habitat (arable field margins)
Low	2	• Habitats of low biodiversity value e.g. temporary grass and clover ley • Agricultural and Urban land of lower biodiversity value.
Very Low	0	• Little or no biodiversity value e.g. hard standing or sealed surface. • Urban – artificial structures which are un-vegetated, sealed surfaces or built linear features of very low biodiversity value.

[20] Interpretation of The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf (publishing.service.gov.uk)

D. Strategic Significance Criteria

In the absence of a Local Nature Recovery Strategy for Kent, in accordance with statutory Metric User Guide the following data has been used to assign strategic significance.

Table A3 Strategic Significance Criteria

Criteria	Definition
High strategic significance	Where the habitat is mapped and described as locally ecologically important within a specific location, within documentation/strategy i.e. • Relevant habitats listed within non-statutory designated site (i.e. important wildlife sites) that contribute to the function of that site (i.e. not all habitats within designated sites are automatically assigned high e.g. urban or modified grassland) • Areas within Ashford Green Corridor (Policy ENV2). • Statutory designated sites and ancient woodland inventory (not applicable to this assessment)
Medium strategic significance	Where habitat does not meet the above criteria but is ecologically important in that specific location (beyond its in inherent value) i.e. • Notable adjoining habitats that provide a connectivity function or complement the site in some way. (i.e. again, not all habitats will act as connectivity habitats i.e. modified grassland or low distinctiveness habitats). • Notable areas of woodland that provide a connectivity function, buffering function or otherwise complement to other strategically important woodland e.g. contained within non-statutory sites, London's Ecological Network and (although not relevant to this project), statutory sites and ancient woodland. • Notable areas of grassland that provide a connectivity function, buffering function or otherwise complement other strategically important grassland e.g. contained within non-statutory sites, London's green belt and metropolitan open land and public green space network and (although not relevant to this project), statutory sites. • Habitats with known records of protected species.
Low strategic significance	Does not meet the above

E. Headline Results

Sevington IBF

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Headline Results

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On-site baseline	*Habitat units*	105.44		
	Hedgerow units	22.71		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	87.88		
	Hedgerow units	35.99		
	Watercourse units	0.00		
On-site net change (units & percentage)	*Habitat units*	-17.57	-16.66%	On-site net gain is less than target set ⚠
	Hedgerow units	13.28	58.49%	
	Watercourse units	0.00	0.00%	
Off-site baseline	*Habitat units*	79.80		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	166.28		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	*Habitat units*	86.48	108.38%	
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	

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Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	68.91
	Hedgerow units	13.28
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	65.35%
	Hedgerow units	58.49%
	Watercourse units	0.00%
Trading rules satisfied?		Yes ✓

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Habitat units	10.00%	105.44	115.99	0.00	No additional area habitat units required to meet target ✓
Hedgerow units	10.00%	22.71	24.98	0.00	No additional hedgerow units required to meet target ✓
Watercourse units	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓

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