Battery Energy Storage System (BESS) Adjacent to Kent Biomass Plant

Biodiversity Net Gain Assessment

Kent Renewable Energy Limited

January 2024

Delivering a better world

Quality information

Prepared by	Checked by	Verified by	Approved by
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Revision History

Revision	Revision date	Details	Authorized	Name	Position
00	November 2023	1st issue	2 November 2023	Neil Titley	Technical Director
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Table of Contents

Tables

1. Introduction

AECOM was commissioned by Kent renewable Energy Ltd (hereafter referred to as the 'Applicant') to undertake a Biodiversity Net Gain (BNG) assessment at Discovery Park complex in Great Stonar (hereafter referred to as the 'Site'). The assessment is intended to inform the planning application for the development of a Battery Energy Storage System (BESS) and associated infrastructure (hereafter referred to as the 'Proposed Development'). The central Ordnance Survey Grid Reference for the Site is TR 33433 59961.

The BNG assessment has been undertaken to quantify the overall effect of the Proposed Development upon the Site's biodiversity value. This is achieved by comparing the Site's baseline habitat value with that of the Proposed Development. Calculations consider the level of proposed habitat loss, retention, enhancement and/or creation delivered by the Proposed Development and are measured using Natural England's Biodiversity Metric 4.0[1] in accordance with associated guidance documents[2] and best practice principles[3]. The report sets out the results of the BNG assessment including the methodology in Section 2, the results in Section 3, the recommendations in Section 4, and the conclusions in Section 5.

1.1 Site Description

The boundary of the BESS (referred to as the 'Site') is illustrated in the Phase 1 Habitat Plan presented in Appendix A. The Application Site boundary is illustrated in Appendix B. The latter comprises a larger area and includes an area of hardstanding used as an internal access route which will be used by vehicles accessing the BESS; it does not constitute works to the internal access route or junction, and therefore has not been included within the Phase 1 survey and BNG assessment.

The Site, as indicated by the red line boundary on the 'Phase 1 Habitat Plan' (Appendix A), is approximately 0.60 ha in size and comprises hardstanding. Since 2014 the Site has been used for storage of logs for the adjacent biomass plant (along with several other nearby plots within the estate). The log store is anticipated to be relocated to a vacant piece of adjacent land in the south-west of the Site, currently a disused car park which was surveyed alongside, but is outside of the scope of this report (and to be progressed via a separate planning application).

The Site is located adjacent to the Kent Renewable Energy ('KRE') Biomass Plant which is operated by the Applicant and currently provides Discovery Park with heat and electricity. The surrounding land uses include further wood storage areas and chipper facilities associated with the KRE Biomass Plant. Further warehouses and office buildings are located on the western side of Ramsgate Road towards the centre of Discovery Park.

To the north-east of the Site (beyond the adjacent Wharf Road) is the River Stour and associated wetlands. Areas to the south and west of the Site are largely comprised of industrial development and internal roads associated with Discovery Park. There are further industrial influences, such as warehouses, car storage sites and electrical infrastructure on either side of the A256 corridor which continues to Port Richborough to the north of the Site. The surrounding area is a mix of agricultural fields, scattered farmsteads, and solar farms.

1.2 Proposed Development

The Proposed Development (presented in the 'Indicative Battery Storage Layout' shown in Appendix B which has been supplied by the client) proposes a new BESS which would connect into and draw power from the adjacent Kent Renewable Energy Biomass Plant, located to the south-west of the Site. It is estimated that the BESS would have a total export capacity of 10 megawatts. The Proposed Development would have an operational lifespan of approximately 40 years, before the Site is restored back to its former state.

[1] Natural England (2023). The Biodiversity Metric 4.0.
[2] Natural England (2023). The Biodiversity Metric 4.0 – User Guide, Technical Annex 1 & Technical Annex 2.
[3] CIEEM, IEMA & ciria (2019). Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide

1.3 Policy Context

1.3.1 National Legislation

It is government policy that *"planning decisions should minimise impacts on and provide net gain for biodiversity"*[4]. The Environment Act[5] includes provisions to make BNG a mandatory requirement within the planning system in England. Amendments to the Town and Country Planning Act[6], anticipated to occur from January 2024 onwards, will require all relevant developments to achieve a minimum 10% net gain in biodiversity units relative to the site's baseline biodiversity value.

1.3.2 Local Planning Policy

The Dover District Local Plan to 2040 – Regulation 19 Submission[7] (not yet adopted) includes Policy NE1 – Biodiversity Net Gain, which states:

"*Development proposals must provide a minimum of 10% biodiversity net gain above the ecological baseline and in accordance with the Biodiversity Net Gain SPD. Proposals for biodiversity net gain must:*

- *be provided as part of the development, within the development site boundary. Only if it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary will the Council consider off-site alternatives in line with the mitigation hierarchy approach;*
- *be provided above the agreed pre-development ecological baseline of the site, for both area and linear habitats, and in addition to any loss;*
- *focus on local priorities and be informed by the Kent Local Nature Recovery Strategy, the Dover District Green Infrastructure Strategy and the Kent Biodiversity Strategy;*
- *be secured for a minimum of 30 years after completion;*
- *be informed by a comprehensive understanding of habitats and species associated with the site, to include survey and assessment work carried out by suitably qualified professionals and relevant information from the Kent and Medway Biological Records Centre; and*
- *follow the mitigation hierarchy and demonstrate by appropriate project design, evidence of adequate avoidance, minimisation and mitigation measures. Where harm to wildlife habitats cannot be avoided or adequately mitigated, appropriate compensation measures will be sought as a last resort."*

It also includes Policy SP14 - Enhancing Green Infrastructure and Biodiversity, which states:

- "*All development must avoid a net loss of biodiversity and will be required to achieve a net gain in biodiversity above the ecological baseline in line with Policy NE1"*

1.3.3 Minimum BNG Requirement

The Site comprises solely hardstanding, therefore the baseline biodiversity units for the Site are zero. In line with guidance[8], the Site would be exempt from mandatory BNG (expected from January 2024 onwards), however, National Planning Policy Framework[4] requirements for a net gain in biodiversity still apply. A numerical unit value increase in biodiversity should be confirmed with the local planning authority (LPA), which will be confirmed as the minimum BNG requirement for the Proposed Development rather than a percentage due to the baseline score of zero.

[4] UK Government (2021). National Planning Policy Framework
[5] UK Government (2023). The Environment Act
[6] UK Government (1990). Town and Country Planning Act
[7] Dover District Council (2022). The Dover District Local Plan to 2040 – Regulation 19 Submission.
[8] Planning Advisory Service (2023). Biodiversity Net Gain FAQs - Frequently Asked Questions.

2. Methodology

2.1 Biodiversity Metric 4.0

The BNG assessment involves making a comparison between the biodiversity value of habitats present within the Site prior to development (i.e., the 'baseline') and the predicted biodiversity value of habitats following the completion of the development (i.e., 'post-development'). The comparison is made in terms of 'biodiversity units', with a 'biodiversity metric' providing the mechanism to allow biodiversity values to be calculated and compared.

Biodiversity Metric 4.0[1] calculates the overall loss or gain of biodiversity of development projects by assessing the distinctiveness (i.e., type of habitat and its value), condition, extent, and strategic significance of habitats on site pre- and post-development, including both permanent and temporary land-take areas. To achieve BNG, the biodiversity unit score must have a post-development score higher than the baseline score.

When calculating the post-development biodiversity units, the Biodiversity Metric 4.0[1] includes a series of standard 'risk multipliers' to account for the inherent risk of creating and restoring habitats, the time taken to establish habitats and the location of the mitigation in relation to the habitats lost on site. The risk multipliers have the effect of reducing the value of the proposed habitats, which means larger areas, habitats of higher distinctiveness, and/or condition are required to mitigate for losses and achieve net gain.

The Biodiversity Metric 4.0[1] assesses and generates separate outputs for area-based habitats (measured in habitat units) and linear based habitats, including hedgerows (measured in hedgerow units) and watercourses (measured in watercourse units). To claim a net gain in biodiversity, there must be an increase across all habitats, hedgerow and river units; the units cannot be summed to give an overall biodiversity unit value i.e., an increase in habitat and hedgerow units cannot be used to offset a loss in watercourse units.

The information required to undertake the calculation is described below.

2.1.1 Baseline Data

UK Habitat (UKHab)[9] data collected by AECOM in September 2023[10] (hereafter referred to as the 'baseline') have been utilised to determine the Site's baseline area-based habitats. The baseline habitats were digitised in Geographic Information System (GIS) to provide area measurements of each habitat type.

Due to the Site comprising solely of hardstanding, a habitat condition assessment was not required.

2.1.2 Post-Development Data

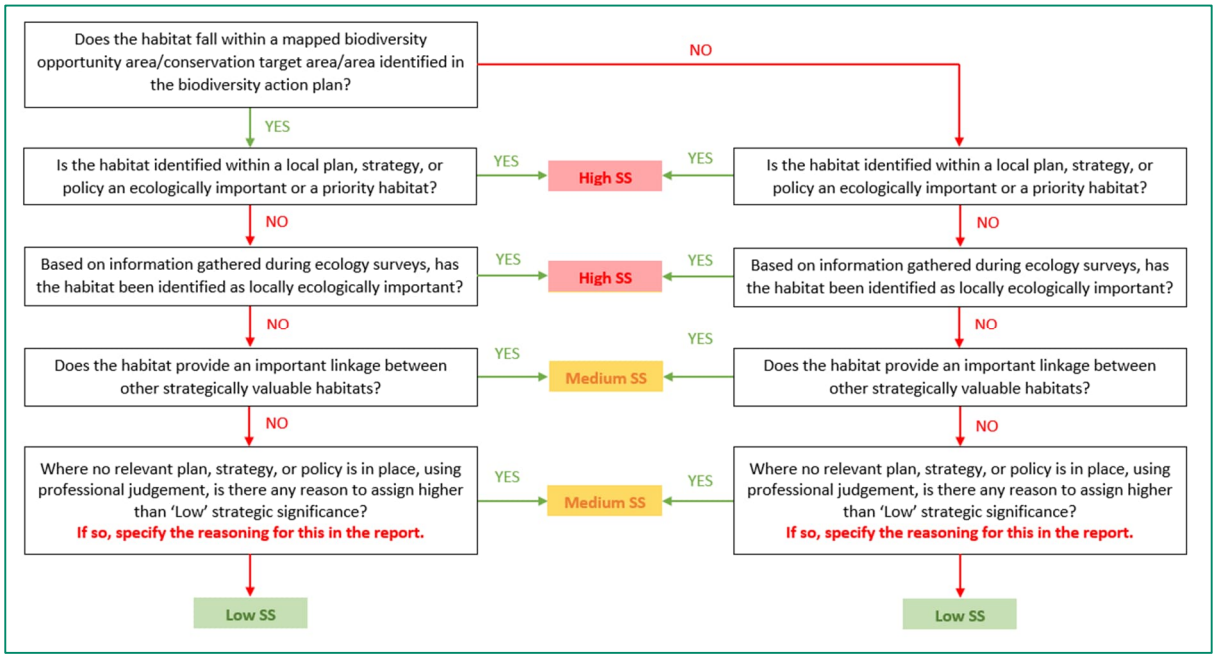
The Indicative Battery Storage Layout[11] has been used to determine the extent and type of habitats to be retained and created post-development. Habitats in the Indicative Battery Storage Layout[11] were converted to UKHab Classification categories (Appendix C.2) before being digitised into GIS to export the post-development habitats. Habitats were assessed to determine whether condition scores were required to be selected in accordance with Biodiversity Metric 4.0 guidance documents[2]. The data was utilised to predict the post-development biodiversity units.

2.1.3 Strategic Significance

Biodiversity Metric 4.0[1] requires that the strategic significance (hereafter referred to as 'SS') of all baseline and post-development habitats be defined. SS refers to strategic locations for local biodiversity and nature improvements, identified within local planning policies. The process of how the SS of a habitat is assessed is shown in Figure 1.

[9] UKHab Ltd (2018 – 2023). UK Habitat Classification.
[10] AECOM (2023). Kent Discovery Park BESS Preliminary Ecological Appraisal.
[11] Natural Power (2023). Indicative Battery Storage Layout.

Figure 1. Strategic Significance Guidance



As part of this assessment, the following relevant documents were reviewed to determine the SS of the habitats on the Site:

- Dover District Local Plan to 2040 – Regulation 19 Submission[7]
- Kent Nature Partnership Biodiversity Strategy (2020)[12]
- Multi-agency geographic information for the countryside (MAGIC) interactive map[13]
- Kent Discovery Park BESS Preliminary Ecological Appraisal (PEA)[10]

Please see detailed information in Appendix D on how SS has been assigned.

2.1.4 Assumptions

In undertaking the calculation, the following assumptions have been made:

- A target net gain unit score has not been agreed with the council prior to production of this BNG assessment. However, recommendations have been provided in Section 4 which are deemed suitable for the scale and impact of the Proposed Development;
- It has been confirmed that no development will take place within 10 m of the River Stour, therefore no river surveys or river metric were required for the current assessment;
- Habitat areas have been reported to two decimal places (d.p). within this report, but inputted into Biodiversity Metric 4.0 to three d.p. for increased accuracy;
- It has been confirmed that no habitat creation would be possible within 10 m of the batteries due to safety restrictions. Therefore, habitat creation recommendations in Section 4 have focused on areas within the Site, but outside of a 10 m buffer of the proposed batteries only. It is assumed that all land within 10 m of the batteries will be required to be retained as Urban – developed land; sealed surface.

2.1.5 Constraints or limitations

The following limitations also apply:

- All habitat areas have been measured using ArcGIS based on the UKHab Habitat Plan and the post-development assessment[11], as such habitat areas are approximations only.

[12] Kent Nature Partnership (2020) Kent Nature Partnership Biodiversity Strategy 2020 to 2045.
[13] Defra (2023) Interactive MAGIC map

3. Results

3.1 Baseline Habitats

The Site covers a total area of 0.58 ha. Urban – Developed land; sealed surface is the only habitat present within the Site. This habitat has low ecological value, being of 'Very Low' distinctiveness. The 'Phase 1 Habitat Plan' is provided in Appendix A.

3.1.1 Baseline Habitats - SS

As outlined in Section 2.1.3, SS has been assigned to all baseline habitats present within the Site:

- 'Low' SS has been assigned to Urban – Developed land; sealed surface as it is not a local priority habitat, and it has low ecological value and habitat connectivity potential.

3.1.2 Baseline Habitat Units

The baseline biodiversity value was calculated as 0.00 units for area-based habitats (Table 1).

Table 1. Baseline Area-Based Habitats

Broad Habitat	Habitat type	Area (ha)	Distinctiveness	Condition	SS	Habitat Units
Urban	Developed land; sealed surface	0.60	V. Low	N/A-Other	Low	0.00
Total	**-**	**0.60**	**-**	**-**	**-**	**0.00**

3.2 Post-Development Habitats

The Proposed Development will include the creation of a track and substation and the placement of batteries. This includes the retention and creation of Urban – Developed land; sealed surface. This habitat has low ecological value, being of 'Very Low' distinctiveness. The post-development is shown on the 'Indicative Battery Storage Layout' in Appendix B.

3.2.1 Post-Development Habitats - SS

The SS for post-development habitats remain the same as those within the baseline.

3.2.2 Retained Habitats

Habitats that are due to be retained within the Proposed Development are detailed in Table 2. In total, 0.51 ha of Urban – Developed land; sealed surface is due to be retained with a biodiversity unit value of 0.00 habitat units.

Table 2. Retained Area-Based Habitats

Broad Habitat	Habitat type	Area (ha)	Distinctiveness	Condition	SS	Habitat Units	Habitat Reference
Urban	Developed land; sealed surface	0.51	V.Low	N/A- Other	Low	0.00	Hardstanding area
Total	**-**	**0.51**	**-**	**-**	**-**	**0.00**	**-**

3.2.3 Created Habitats

Habitats that are due to be created within the Proposed Development are detailed in Table 3. In total, 0.09 ha of Urban – Developed land; sealed surface is due to be created with a biodiversity unit value of 0.00 habitat units.

Table 3. Retained Area-Based Habitats

Broad Habitat	Habitat type	Area (ha)	Distinctiveness	Condition	SS	Habitat Units	Habitat Reference
Urban	Developed land; sealed surface	0.09	V.Low	N/A- Other	Low	0.00	Batteries, substation and proposed track
Total	**-**	**0.09**	**-**	**-**	**-**	**0.00**	**-**

3.3 Summary of Results

All baseline habitats and habitats proposed to be created and retained are present within the accompanying Biodiversity Metric 4.0[1] assessment for the Proposed Development (Appendix E).

A summary of the results is shown in Table 4. Based on the current post-development plan, the Proposed Development is predicted to result in no net loss or gain of biodiversity.

Table 4. Summary of Results

Habitat Type	Baseline	Post-Development	Total Net Unit Change	Total Net % Change
Area-Based Units	0.00	0.00	0.00	N/A

3.3.1 Trading Rules

The trading rules within the Biodiversity Metric 4.0[1] are a set of rules that try to prevent the 'trading down' of habitat distinctiveness. Under the trading rules losses of habitat are to be compensated for on a “like for like” or “like for better” basis. Trading rules are not applicable for the Proposed Development due to the ‘V. Low’ distinctiveness of Urban – Developed land; sealed surface habitats present.

4. Recommendations

Based on the results of the assessment, further habitat mitigation is required to achieve the target of a net gain (>0 units) in biodiversity. In accordance with best practice, the delivery of habitat creation measures should be designed to mitigate for the impacts of the Proposed Development by following the mitigation hierarchy (avoid, minimise and mitigate as a last resort), and should contribute to local ecological priorities.

In following the mitigation hierarchy, habitat creation should focus on areas within the Site (on-site), but outside of a 10 m buffer of the proposed batteries to still adhere with local Fire Rescue Service guidelines. It is assumed that all land within 10 m of the batteries will be required to be retained as Urban – Developed land; sealed surface.

Kent Nature Partnership Biodiversity Strategy[12] details local priority habitats, however due to the limited area available for habitat creation within the Site and the disconnected nature of the Site, it would not be possible to incorporate these priority habitats into a habitat creation recommendation.

As the baseline habitat units within the Site are zero, in line with the guidance[8], a numerical unit value increase in biodiversity will be confirmed with the council as part of the Environmental Management Plan (that would be produced post consent), which will be confirmed as the minimum BNG requirement for the Proposed Development.

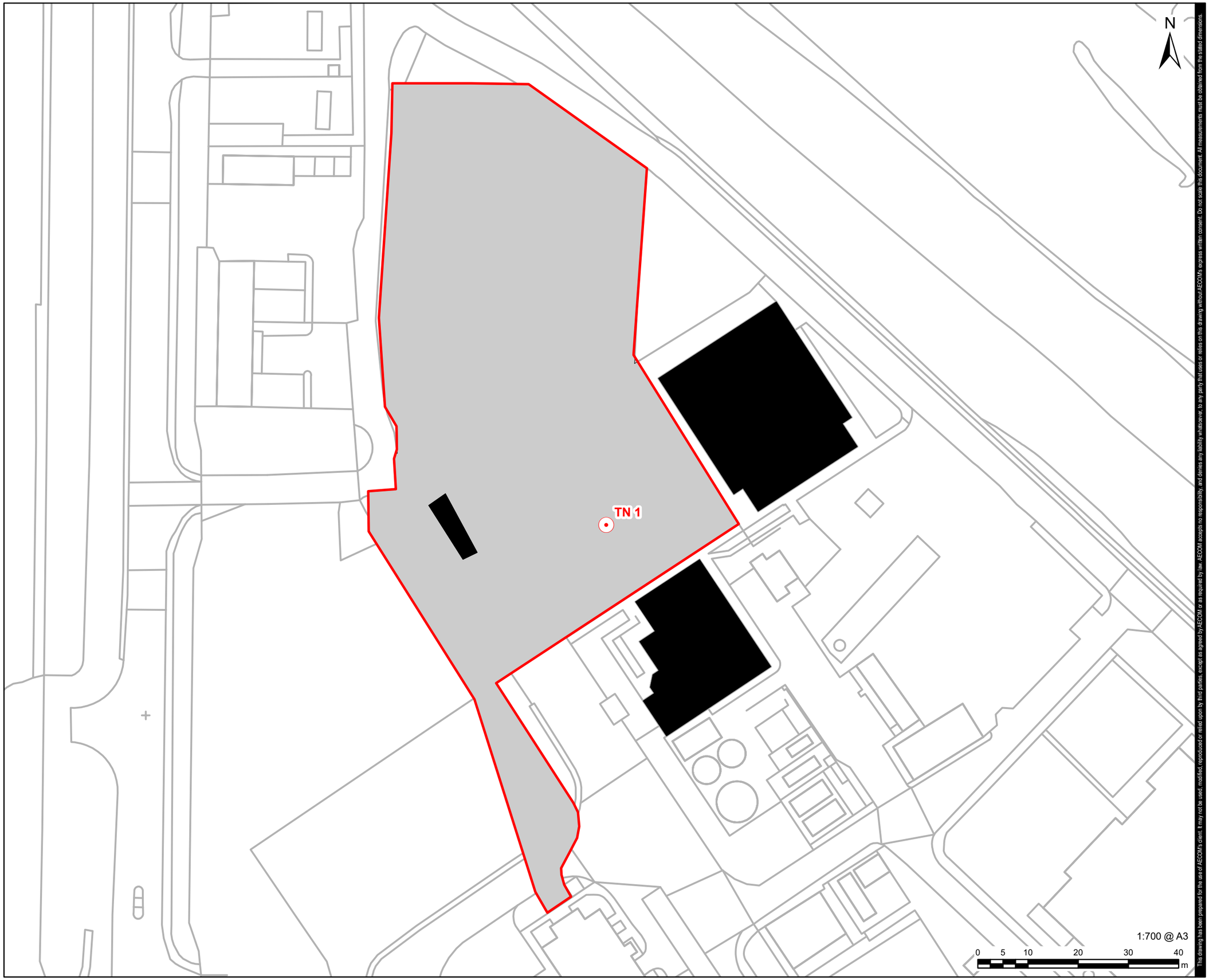
As an example, the addition of medium sized Individual urban tree would produce approximately 0.11 area-based biodiversity units. The ability to plant any vegetation onsite will be discussed and agreed with the council and local fire and rescue service after receipt of any planning consent as part of the Environmental Management Plan.

5. Conclusion

Based on the current plans for the Site, the Proposed Development is predicted to result in no net loss or gain of area-based habitat units. The Proposed Development therefore does not meet the minimum BNG target of a net gain (>0 units) in biodiversity, in line with National Planning Policy Framework[4] requirements. Because of this, an on-site recommendation has been made in Section 4 which would enable the Proposed Development to achieve a net gain in biodiversity units. In line with the guidance[8], a numerical unit value increase in biodiversity will be confirmed with the council as the minimum BNG requirement for the Proposed Development.

Should onsite BNG not be possible due to safety restrictions associated with the BESS and existing biomass plant when discussing with the local Fire Rescue Service teams post consent, the potential to deliver the BNG uplift offsite will be discussed with the council as part of discharging the planning conditions attached to any consent.

Appendix A Phase 1 Habitat Plan



Revision: 0 Drawn: HW Checked: AM Approved: JS Date: 2023-12-14

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LEGEND

- BESS Site Boundary

Phase 1 Habitat Feature

- Target Note
- Buildings
- Developed Land; Sealed Surface

NOTES

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ISSUE PURPOSE

DRAFT

PROJECT NUMBER

60714594

FIGURE TITLE

Phase 1 Habitat Mapping

FIGURE NUMBER

Figure 1

Appendix B Application Site Boundary

SCALE AT 1:1000

0m 20 40 60 80m

INDICATIVE BATTERY STORAGE BOUNDARY

SCALE 1:1000

LEGAL: NATURAL POWER CONSULTANTS LTD TAKE NO RESPONSIBILITY FOR THE ACCURACY OF DATA PROVIDED BY THIRD PARTIES.

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KEY:

BOUNDARY - PLANNING APPLICATION

REV	DESCRIPTION	BY	CH	APP	DATE
D	BOUNDARY UPDATED	MH	PJ	JS	11/01/24
C	BOUNDARY UPDATED	MH	PJ	JS	12/12/23
B	BOUNDARY EXTENDED	MH	PJ	JS	11/12/23
A	INITIAL ISSUE	MH	PJ	JS	29/09/23

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IFS DOC NO.: 1332638	IFS ACTIVITY: 10.1010
SCALE: 1:1000 @ A1	SHEET NO.: 1 OF 1

STATUS: **FOR INFORMATION**

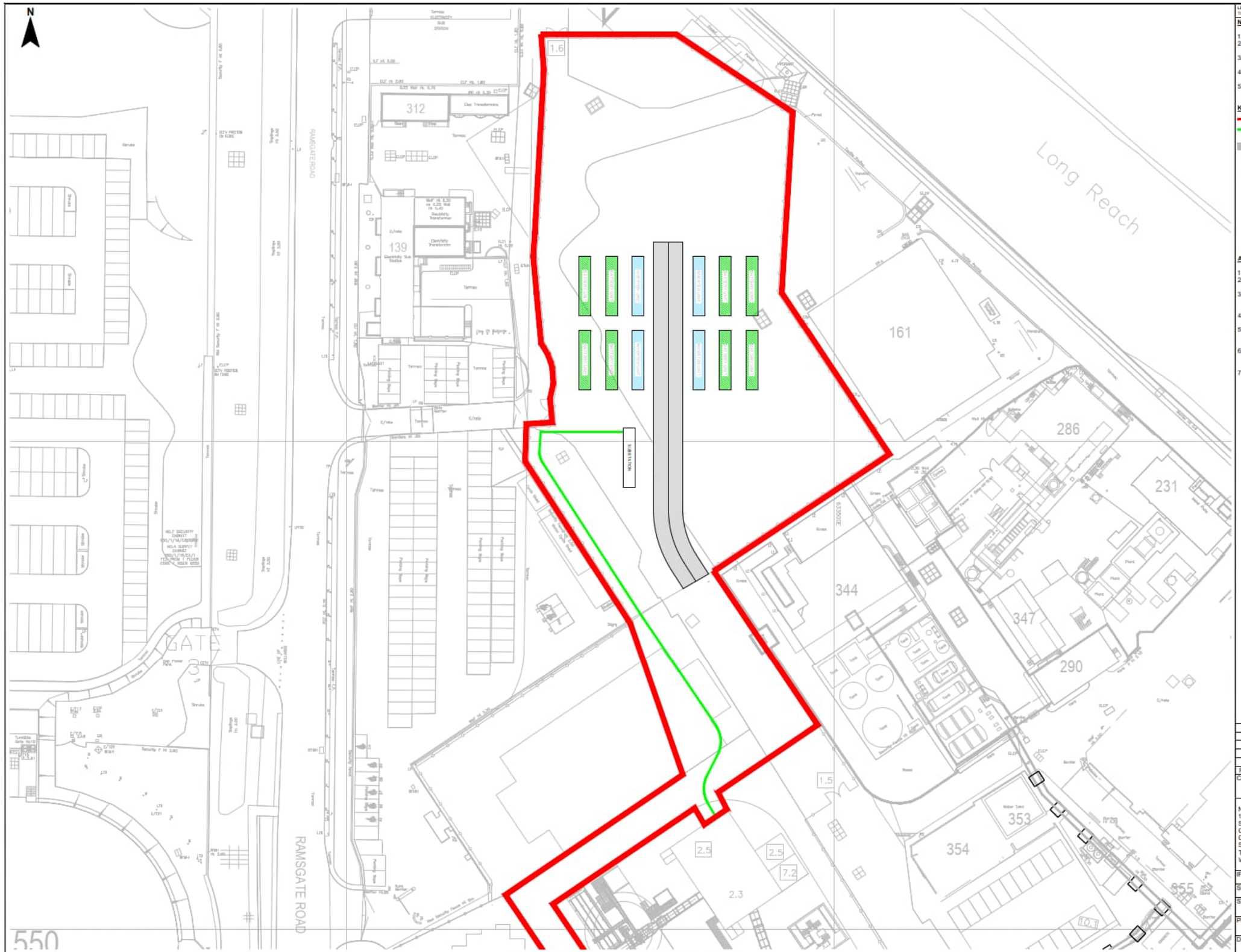
PROJECT: KRE BESS

DRAWING TITLE: INDICATIVE BATTERY STORAGE BOUNDARY

DRAWING NO.: 18189_LAY_1002

REVISION: D

Appendix C Battery Storage Site Layout



SCALE AT 1:350

0m 5 10 15 20 25 30

INDICATIVE BATTERY STORAGE LAYOUT

SCALE 1:350

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5. ALL BUILDINGS SHOWN ARE SUBJECT TO DETAILED DESIGN FOR CONSTRUCTION PURPOSES.

KEY:

- BOUNDARY - PLANNING APPLICATION
- BESS CABLES FROM BATTERY SUBSTATION TO KRE 33KV SUBSTATION
- PROPOSED TRACK
- BATTERY UNITS
- INVERTER UNITS

ASSUMPTIONS:

1. 12.2m x 2.4m (40FT x 8FT) CONTAINER.
2. 2.5 MWh CAPACITY PER 12.2m x 2.4m (40FT x 8FT) CONTAINER.
3. 1 INVERTER + LV/HV TRANSFORMER SOLUTION PER 2 BESS CONTAINERS EQUALLING 2.5MW/5MWh OR A 2 HOUR SYSTEM.
4. AT LEAST 3m SEPARATION FROM SITE BOUNDARY TO ALLOW FOR MAINTENANCE VEHICLE ACCESS.
5. 3m SEPARATION BETWEEN CONTAINERS. ADDITIONAL SPACE FOR FUTURE EXPANSION, FIRE SAFETY AND EASE OF O&M.
6. POINT OF CONNECTION AT SUBSTATION LOCATED TO THE WEST OF THE PROPOSED SITE AREA, BEYOND THE GREEN SERVICE CORRIDOR.
7. SITE DESIGN IS BASED ON SPACE OPTIMISATION AND PRELIMINARY ELECTRICAL OPTIMISATION AND DOES NOT CONSIDER ANY STRUCTURAL, DETAILED ELECTRICAL OR MECHANICAL OPTIMISATIONS. THIS DRAWING IS ONLY INTENDED TO BE USED FOR INDICATIVE PURPOSES.

REV	DESCRIPTION	BY	CH	APP	DATE
E	BOUNDARY UPDATED	MH	PJ	JS	11/01/24
D	BOUNDARY UPDATED	MH	PJ	JS	12/12/23
C	BOUNDARY EXTENDED	MH	PJ	JS	11/12/23
B	CABLE ROUTE ADDED	MH	PJ	JS	18/10/23
A	INITIAL ISSUE	MH	PJ	JS	29/09/23

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PROJECT: KRE BESS

DRAWING TITLE: INDICATIVE BATTERY STORAGE LAYOUT

DRAWING NO.:	REVISION
18189_LAY_1001	E

Appendix D Habitat Classification Conversions

D.1 Phase 1 Habitat to UKHab Conversion

Phase 1 Habitat Classification	UKHab Classification
Hardstanding	Urban – Developed land; sealed surface

D.2 Post-Development Assessment to UKHab Conversion

Indicative Battery Storage Layout[11] Classification	UKHab Classification
Hardstanding, batteries, substation and proposed track	Urban – Developed land; sealed surface

Appendix E Strategic Significance Rationale

Source	Strategic Significance Information
Dover District Local Plan to 2040 – Regulation 19 Submission[7]	The plan includes Policy NE1 – Biodiversity Net Gain and Policy SP14 – Enhancing Green Infrastructure and Biodiversity. The plan also includes a map which show Biodiversity Opportunity Areas (BOAs). The Site does not fall within a BOA. **Application to assessment** No impact on SS score of habitats
Kent Nature Partnership Biodiversity Strategy[12]	The Kent Nature Partnership Biodiversity Strategy lists priority habitats for the county of Kent. These include: lowland beech and yew woodland, lowland mixed broadleaved woodland, chalk grassland, lowland meadows, hedgerows, brownfield and traditional orchard. No priority habitats are present within the Site. **Application to assessment** No impact on SS score of habitats.
MAGIC Maps[13]	The MAGIC interactive map was used to determine if any priority habitats were present on-site and if there were opportunities for improving connections to high-value habitats. No priority habitats were recorded on-site and there was low habitat connectivity potential due to the urban setting of the Site. **Application to assessment** No impact on SS score of habitats.
Discovery Park PEA[10]	The Discovery Park PEA includes findings from both the UKHab survey and potential habitat suitability surveys for protected and notable species. No significant ecological value was assigned to any baseline habitats within the PEA. **Application to assessment** No impact on SS score of habitats.

Appendix F Biodiversity Metric 4.0 Calculation

Biodiversity Metric 4.0 to be included as an attachment.