



Crossland
Ecology

Draft Biodiversity Gain Plan

Site: Deans Yard, South Road, Baldock,
Hertfordshire

Client: JP&S Services Ltd

Date: May 2025



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Quality Assurance

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A	Final	15/05/2025	CB	SC

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Site assessments / surveys (where required) have been restricted to a level of detail required to achieve the stated objectives of the work.

Due to the temporal nature of ecology, the findings of this report should not be relied upon if a significant amount of time has passed, as defined by the Chartered Institute of Ecology and Environmental Management (CIEEM) guidelines.

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1.0 Summary

- 1.1** This Draft Biodiversity Gain Plan incorporates the findings and recommendations of a habitat condition assessment survey carried out at Deans Yard, South Road, Baldock, Hertfordshire (the site). The site survey was undertaken to inform a planning application with respect to delivering BNG, based on the proposed designs provided.
- 1.2** The site was located in the town of Baldock, north-east of Letchworth Garden City, Hertfordshire. It covered approximately 3,746m² (or 0.37ha) and comprised a range of commercial buildings and a residential property comprising two flats with an associated garden and hedgerow.
- 1.3** Based on the current calculations, the statutory metric has demonstrated that the on-site proposals will result in a net gain of 1416.88% (0.28) habitat units and 50.79% (0.01) hedgerow units. Therefore, the proposed development will deliver a 10% net gain for each unit category in-line with local and national planning policy.
- 1.4** It is considered that if the measures laid out within this report are implemented, the site can deliver a biodiversity net gain and adhere to both local and national current planning policy and the Environment Act (2021).

2.0 Introduction

Purpose of this Report

- 2.1** Crossland Ecology was commissioned by JP&S Services Ltd to undertake a biodiversity net gain (BNG) assessment for Deans Yard, South Road, Baldock, Hertfordshire (the site). A plan showing the application boundary and survey area is provided in Appendix 1.
- 2.2** A habitat condition assessment was undertaken with findings used to feed into the BNG calculations for the site to determine the baseline value of both habitat and hedgerow features. Calculations of the proposed development were based on the proposed scheme shown in Appendix 1 and assumptions provided within this report. These calculations have been used to guide the proposals design and determine the level of potential BNG change as a result of the development and to identify any necessary mitigation measures.

Aims and Objectives

- 2.3** The aims of this report are to:
- Calculate the baseline conditions as biodiversity units;
 - Inform the proposed development design;
 - Calculate changes to biodiversity units as a result of the proposed development; and
 - Calculate proposed mitigation measures (as far as possible) and enhancement opportunities where appropriate to demonstrate a net gain for biodiversity.

Site Description

- 2.4** The site covered approximately 3,746m² (or 0.37ha) and comprised a range of commercial buildings and a residential property comprising two flats with an associated garden and hedgerow. The site is bordered by South Road to the south, by Clothall Road to the north, and by commercial buildings to the east and west. The wider landscape is predominantly rural, with agricultural land to the north, east and south. Letchworth Garden City is located approximately 1.4km to the south-west.

Condition assessment limitations

- 2.5** The condition assessment was undertaken in April which is considered outside of the optimal time of year for botanical surveys. However, the habitats and species present within the site were easily identifiable due to their ubiquitous nature. As such, there were no significant limitations to the survey.

Proposed Project Description

- 2.6** The proposals for the site are to demolish all property on the site with the exception of the corner house (no. 53), to be replaced with a newly constructed a petrol filling

station fronting Clothall Road and 9no. residential dwellings with access from South Road.

Planning Policy and Legislation

2.7 This BNG assessment has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:

- The Environment Act (2021);
- UK Government's 25 Year Environmental Plan (DEFRA, 2018);
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (DEFRA, 2011);
- National Planning Policy Framework (NPPF) (DLUHC, 2024);
- The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006); and
- The North Herts Local Plan 2011 – 2031 (North Herts Council).

2.8 Relevant local policies are outlined in Appendix 2. Of note, no specific percentage net gain in ecological units is outlined within the North Herts Local Plan (Adopted 2022). As such, the minimum requirement is therefore set by that outlined within the Environment Act 2021 (i.e. 10%).

3.0 Methods

General

- 3.1** BNG is an approach to development that leaves biodiversity in a better state than before, whereby the development attempts to achieve a positive net outcome for biodiversity on the site, post-development. This assessment identifies opportunities for ecological enhancement at the site, aiming to provide a net gain for biodiversity, based upon enhancing the current ecological resource, and creating new habitat where habitat losses have occurred.

Data sources

- 3.2** Several data sources informed the BNG assessment:

- A UKHab and habitat condition assessment was undertaken in April 2025 by Chris Brown BSc (Hons) ACIEEM;
- Publicly available Open-Source Natural England datasets for Habitats of Principal Importance (HPIs), ancient woodland (classed as irreplaceable habitat), and statutory designated sites for nature conservation; and
- The proposed scheme (Appendix 1) was digitised into QGIS for use in BNG calculations.

BNG Assessment

- 3.3** Data for habitat and hedgerows were entered into the Statutory Biodiversity Metric calculation tool (an Excel workbook) (DEFRA, 2024) to calculate the ecological baseline for the site. This information creates the numerical parameters by which the number of Biodiversity Units are calculated. A brief explanation of these factors is provided below.

Area / length

- 3.4** The metric assesses linear habitats, such as watercourses or hedgerows separately from other habitat parcels. Linear habitats are measured in kilometers (km), non-linear habitats are measured in hectares (ha). Areas and lengths were all calculated using measurement tools within QGIS.

Distinctiveness

- 3.5** Each habitat in the UK Habitat Classification (Butcher *et al.*, 2000) is automatically assigned a score for distinctiveness within the metric. Distinctiveness recognises the different characteristics of habitats in relation to their capacity for supporting species richness, their tendency to support species found rarely in other habitats, and the rarity of the habitat itself.
- 3.6** It should be noted that irreplaceable habitats (such as ancient woodland) are not adequately measured by the metric and will require separate consideration which must comply with existing national and local policy and legislation. Data relating to these can be entered into the metric, so as to give an indicative picture of the

biodiversity value of the habitats present on a site, but this should be supported by bespoke advice.

Condition

- 3.7** The condition of each habitat is assessed separately using the methods set out in the Statutory Biodiversity Metric User Guide (DEFRA, 2024). This approach details condition criteria for each habitat type, and then applies thresholds for how many of these criteria are met to establish the condition score of the habitat. This requires detailed assessment of the habitat prior to completing the metric. Habitats at the bottom end of distinctiveness do not have a specific approach to condition assessment and are instead given a standard condition score. Scores assigned to condition are given as Good = 3; Moderate = 2; Poor = 1; Not Applicable = 0.

Strategic significance

- 3.8** This element is to assess the habitats on Site in relation to the geographical location in which they are found. Information to determine the significance of a habitat within a specific landscape can be found in a variety of sources that include: local plans, local biodiversity records and National Character Areas. The strategic significance is based on three categories which equates to a different score, which are as follows: High = 1.15; Medium = 1.1 and Low = 1.

Risk factors

- 3.9** The metric includes two risk factor multipliers that reflect the difficulties in creating certain habitat types in a way that achieves significant biodiversity benefits. These are “Time to target condition” and “Difficulty of creation”. These recognise that different habitats attain degrees of maturity at different rates and that the successful creation of some habitats is not certain, due to various environmental and human factors.
- 3.10** Thus, the planned creation of a habitat that will take a substantial amount of time to reach target condition, such as woodland, or that is considered difficult to achieve, such as lowland fen, would equate to fewer Habitat Units than an existing area of the same habitat. The metric contains standard multipliers for each habitat class.

Application of the metric

- 3.11** The ‘Proposed Site Plan’ which illustrates the footprint of the proposed development has been used to assess and quantify the loss of habitat, and calculate the areas of habitat to be retained. These were entered into the metric to provide a value for the habitat, hedgerow and watercourse units to be lost as a result of the development.
- 3.12** The ‘Proposed Site Plan’ was then used to calculate the extent of each habitat type that is to be created and this information was entered into the Site Habitat Creation section of the tool, along with values for the equivalent parameters as described above, to give a post-intervention value. Where detailed planting schemes have not

been provided, an informed assumption on likely habitat to be created has been made, suitable for the location and use of the land.

- 3.13** A comparison of the baseline and the post-intervention unit figures then provides the percentage net change in Biodiversity Units, positive or negative.

Assumptions and Limitations

- 3.14** It should be noted that the metric does not use species explicitly. Instead, it uses broad habitat categories as a proxy for the biodiversity 'value' of the species communities that make up different habitats. The metric does not affect the legal obligations associated with protected species and this is beyond the scope of metric.
- 3.15** The Statutory DEFRA Biodiversity Metric has been used in this report to demonstrate BNG. It is a useful tool to help inform plans and decisions to benefit biodiversity. However, it is important to be aware of its limitations. For BNG to be used appropriately and to be successfully implemented (i.e. achieving a BNG), the Good Practice Principles for Development established by Baker et al. (2019) must be adhered to. These principles have been developed by the Construction Industry Research and Information Association (CIRIA), the Chartered Institute for Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA).
- 3.16** The metric does not override existing planning policy or legislation, including the mitigation hierarchy, which should always be considered as the metric is applied. The mitigation hierarchy states that action must first be taken to avoid any adverse impact to biodiversity, to mitigate (on site) any impacts that cannot be avoided and, only as a last resort, to compensate (off site) for any remaining impacts.
- 3.17** The outputs of the metric are not absolute values but, instead, they provide proxy for the relative biodiversity worth of the Site before and after intervention. The quality and reliability of outputs will depend on the quality of the inputs. Like for like habitat or better should be the aim and one habitat should not be replaced with another where possible.
- 3.18** It is important to emphasise that, while the metric provides a useful tool to demonstrate biodiversity net gain, it does not remove the need for professional judgement by a suitably competent ecologist. Ecological functionality is important to underpin the assessment and the Site's design should ultimately be based upon the Good Practice Principles. The metric should also not be a reason to miss opportunities to benefit key species through biodiversity net gain where they are not directly accounted for within the metric.

4.0 **BNG Good Practice Principles for Development**

- 4.1** The metric is a tool that can be used to help inform plans and decisions. It is important, however, to be aware of its limitations and to conduct assessments in accordance with the following principles and rules. The key principles and rules (as set out below) have therefore been considered as part of this assessment with justification provided as to how each BNG principle has been applied.
- 4.2** Table 1 outlines the BNG principles and provides a statement of how these were each considered during the assessment.

Table 1: BNG Good Principles for Development (Baker *et al.*, 2019)

Principle No.	Description	Statement of consideration
1	Apply the mitigation hierarchy.	The mitigation hierarchy has been applied to avoid and minimise impacts on the site's key features, which include the garden habitats and a non-native and ornamental hedgerow which will be retained. Given the layout of the existing site, the loss of a small area of introduced shrub cannot be avoided in order to deliver the scheme. On-site compensation measures will ensure there is an overall net gain in biodiversity units.
2	Avoid losing biodiversity that cannot be offset elsewhere.	The habitats of value will be retained where possible. Given the remainder of the site comprises habitats of low ecological value, development of any area will involve the loss of these habitats. On-site compensation will be required in order to compensate for on-site losses. Given the common habitat types present, this is considered to be achievable.
3	Be inclusive and equitable.	Every effort has been made to record accurately and map to a scale that is appropriate for the site. This is further supported by undertaking habitat condition assessments to detail the decision-making process. Based on this approach it is considered that although the values are only relative, the best outcome for each habitat onsite has been calculated.
4	Address risk	Adequate information has been recorded onsite to determine the associated 'typical' habitats on-site.

Principle No.	Description	Statement of consideration
5	Make a measurable net gain contribution	The concept designs have sought to retain existing habitats where possible. A measurable net gain will be achievable through on-site compensation.
6	Achieve the best outcomes for biodiversity	The ecological principles – such as the mitigation hierarchy will be considered throughout the stages of development from design – implementation and operational phases. Documents such as Habitats Management Plans may be required where appropriate, and will detail long-term management objectives, management prescriptions, timetable and monitoring.
7	Be additional.	On-site compensation will be delivered specifically for BNG.
8	Create a net gain legacy	If on-site gains are sought, the proposed development will lead to an overall net gain in biodiversity despite areas of habitat loss, creating a net gain legacy.
9	Optimise sustainability	The scheme has been designed to retain the most valuable habitats (garden habitats and a non-native and ornamental hedgerow) to provide opportunities for biodiversity.
10	Be transparent	The commitment to BNG delivery is stated within this report. Through the operational lifetime of the site, monitoring/auditing reports will be made available to the Local Planning Authority to evidence delivery in accordance with the approved scheme.

5.0 Baseline Conditions

- 5.1** The site comprised a range of commercial buildings and a residential property comprising two flats with an associated garden and hedgerow. The habitats of greatest ecological value within the site are the garden habitats, introduced shrub and the non-native and ornamental hedgerow which were recorded during the baseline survey.
- 5.2** In total, four habitat types were identified, mapped, classified and measured by area (hectares). One linear feature was also identified, mapped, classified and measured by length (metres). The habitats present at the baseline and as shown within Appendix 3 are:
- u1, 846, 847 Vegetated garden
 - u1b Developed land; sealed surface
 - u1b5 Buildings
 - u1f, 847 Sparsely vegetated urban land
 - h2b Non-native and ornamental hedgerow
- 5.3** The habitats were recorded in accordance with the UKHab classification (UKHab, 2023) and mapped using QGIS (Appendix 3). The UKHab classification was utilised as this is deemed compatible with the Biodiversity Metric. Each of the additional factors have also been assessed and included within the Statutory Biodiversity Metric workbook. Condition assessments of each habitat type are detailed in Appendix 4, with photos provided in Appendix 5.
- 5.4** Detailed calculations are displayed within the Statutory Biodiversity Metric workbook (The Stat Metric_Deans Yard, South Road, Baldock, 15.05.25). The baseline results are summarised in Table 2 below.

6.0 **Proposed Design**

Impact Assessment

- 6.1** The 'Proposed Site Plan' used to assess the impact of the development and calculate the elements of habitat creation is shown in Appendix 1.
- 6.2** The 'Proposed Site Plan' shows that the residential building (no 53.) and its associated garden and non-native and ornamental hedgerow will be retained as part of the proposed development. An area of introduced shrub will be lost in its entirety to facilitate the proposed development. The remainder of the site is developed land; sealed surface, some of which will become vegetated gardens for the proposed residential units alongside communal grassland areas. The metric therefore shows a decrease in developed land; sealed surface, an increase in vegetated garden and modified grassland, and a loss of introduced shrub.
- 6.3** The 'Proposed Site Plan' shows that approximately 42 new small trees will be planted as part of the proposals. However, 30 of these trees will be planted within private residential gardens, and therefore their condition and management cannot be secured long-term. Therefore, in-line with the approach outlined in the Statutory Biodiversity Metric User Guide, trees proposed within private gardens have not been included within the Metric.
- 6.4** Table 2 provides a summary for the post-development biodiversity values for the site.

Table 2: On-site change by broad habitat type

	Baseline	Post-development on-site	On-site change
Habitat group	On-site existing value	On-site proposed value	On-site unit change
Urban	0.02	0.15	0.13
Individual trees	0.00	0.14	0.14
Grassland	0.00	0.02	0.02
Hedgerows	0.02	0.03	0.01

- 6.5** Appendix 6 shows the proposed habitats post development. These include tree planting, modified grassland and ornamental hedgerow. All proposed habitats have a target condition of 'poor' and as such do not require any specific management over and above supplier specifications.
- 6.6** The proposals result in a net gain of 1416.88% (0.28) habitat units and 50.79% (0.01) hedgerow units. Therefore, the proposed development will deliver a 10% net gain for each unit category in-line with local and national planning policy.

Table 3: Summary of the BNG results

Deans Yard, South Road, Baldock, Hertfordshire		Return to results menu	
Headline Results			
Scroll down for final results 			
On-site baseline	Habitat units	0.02	
	Hedgerow units	0.02	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.30	
	Hedgerow units	0.03	
	Watercourse units	0.00	
On-site net change (units & percentage)	Habitat units	0.28	1416.88%
	Hedgerow units	0.01	50.79%
	Watercourse units	0.00	0.00%
Off-site baseline	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.28	
	Hedgerow units	0.01	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
FINAL RESULTS			
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.28	
	Hedgerow units	0.01	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	1416.88%	
	Hedgerow units	50.79%	
	Watercourse units	0.00%	
Trading rules satisfied?	Yes ✓		

7.0 Implementation, Construction, Management and Monitoring Plans

- 7.1** A Habitat Management and Monitoring Plan (HMMP) must be produced for the on-site habitats which are deemed 'significant', the HMMP will detail habitat implementation and management. If required, the HMMP should be prepared over a 30-year period with more detail provided for the 1-3 year implementation and 3-5 year maintenance period. The HMMP should also contain proposals for monitoring visits and frequency of visits and scope for remedial works/changes to management prescriptions. All drawings and maps will be produced using QGIS to allow accurate monitoring.
- 7.2** Following planning approval, a final Biodiversity Gain Plan will be required to be submitted to the local planning authority to show how the BNG will be achieved. Implementation of the recommendations within the HMMP should be managed by the site Biodiversity Champion who will be the lead to ensure compliance with all ecological strategies for the site.
- 7.3** The audit report should include information in the "as built" metric compared to the original baseline plans and the "as built" habitat plan. Where the "as built" habitat plan differs from the original designs, more detailed information may be required, to ensure transparency about what has been delivered. Where differences occur, a copy of the same metric version, e.g. a completed workbook including the full calculations that lead to the final biodiversity unit scores, should be submitted. Summary results of metric calculations would not be sufficient. Where appropriate, detailed justifications for the choice of habitat types, distinctiveness and condition should be added to the comments column or provided separately in a report.
- 7.4** The audit report should also demonstrate compliance with the BNG good practice principles (Baker et al, 2019).

8.0 Conclusions

- 8.1** The site covered approximately 3,746m² (or 0.37ha) and comprised a range of commercial buildings and a residential property comprising two flats with an associated garden and hedgerow.
- 8.2** Based on the current calculations, the statutory metric has demonstrated that the on-site proposals will result in a net gain of 1416.88% (0.28) habitat units and 50.79% (0.01) hedgerow units. Therefore, the proposed development will deliver a 10% net gain for each unit category in-line with local and national planning policy.
- 8.3** It is considered that if the on-site measures laid out within this report are implemented, the site can deliver a biodiversity net gain and adhere to both local and national current planning policy and the Environment Act (2021).

9.0 **References**

Baker et al. (2019). Biodiversity net gain. Good practice principles for development A *practical guide*. CIRIA London

Butcher B, Edmonds R, Norton L and Treweek J (2020). The UK Habitat Classification User Manual Version 1.1 at <http://www.ukhab.org/>

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Defra (2024). *The Statutory Biodiversity Metric User Guide*, HM Government.

Department for Levelling Up, Housing and Communities (DLUHC) (2023) *National Planning Policy Framework*. [Online]. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

Poland J, Clement E (2009). The vegetative key to the British flora. Botanical Society of the British Isles.

Rose R, O'reilly C (2006). The wild flower key: how to identify wild flowers, trees and shrubs in Britain and Ireland. Warne.

UKHab Ltd (2023). UK Habitat Classification Version 2.0 at <https://ukhab.org/>

Appendix 1: Proposed Site Plan



Appendix 2: Relevant local planning policies

This document has not been prepared by a legal or planning professional and should be read as an interpretation of relevant statutes and planning policy guidance only. The information presented within this document has been reported in good faith and are the genuine opinion of Crossland Ecology on such matters. Crossland Ecology does not accept any liability resulting from outcomes relating to the use of this information or its interpretation within this document.

North Herts Local Plan 2011 – 2031

The North Herts Local Plan (adopted 8th November 2022) provides a single policy which covers biodiversity.

Policy NE4: Biodiversity and geological sites

Planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations and features listed in Policy SP12.

All development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible.

Applicants should, having regard to the status of any affected site(s) or feature(s):

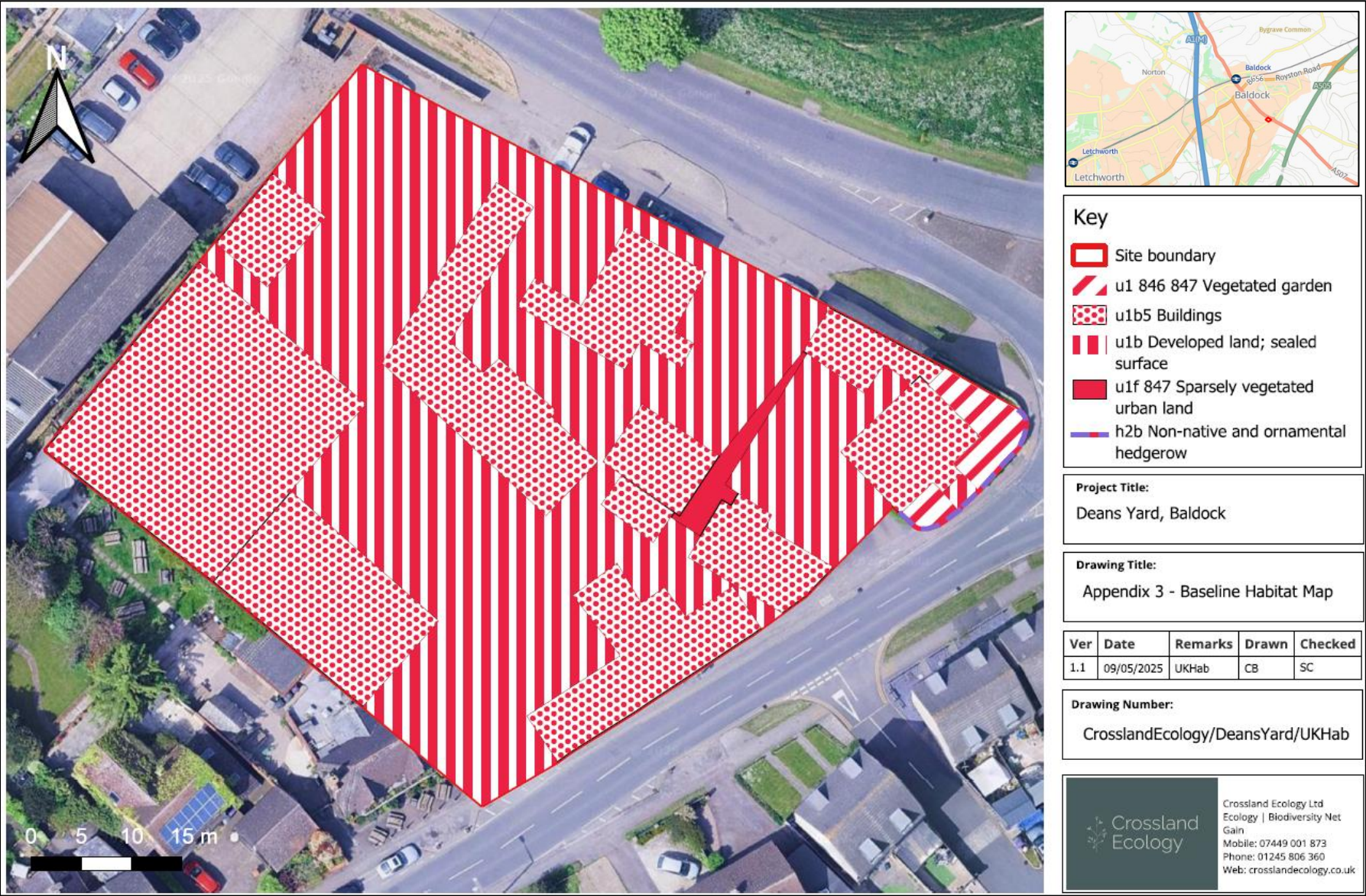
- a) Submit an ecological survey that is commensurate to the scale and location of the development and the likely impact on biodiversity, the legal protection or other status of the site;
- b) Demonstrate that adverse effects can be avoided and/or satisfactorily minimised having regard to the hierarchy of protection below:
 - i) Locating on an alternative site with a less harmful impact;
 - ii) Providing adequate mitigation measures; or
 - iii) As a last resort compensated for.

The acceptability of approach(es) to avoidance, mitigation and compensation will be commensurate with the status of the asset(s) likely to be affected by the application; Compensation is unlikely to be an appropriate solution for proposals affecting nationally or internationally designated sites other than in the most exceptional circumstances.

- c) Include appropriate measures to manage construction impacts by demonstrating how existing wildlife habitats supporting protected or priority species will be retained, safeguarded and managed during construction;
- d) Integrate appropriate buffers of complimentary habitat for designated sites and other connective features, wildlife habitats, priority habitats and species into the ecological mitigation and design. The appropriateness of any buffers will be considered having regard to the status of the relevant habitat. 12 metres of complimentary habitat should be provided around wildlife sites (locally designated sites and above), trees and hedgerows. It may be necessary to exceed this distance for fragile habitats such as ancient woodland or to provide appropriate root protection for mature trees; and
- e) Provide a long-term management and monitoring plan including mitigation measures as necessary.

Local Geological Sites are ratified by the Herts & Middlesex Wildlife Trust (HMWT) and are afforded the same protection as Local Wildlife Sites.

Appendix 3: Baseline Habitats Plan



Appendix 4: Condition assessment forms

Condition assessments were not required for any of the habitats present within the site.

Appendix 5: Site Photographs

Photo 1: Southern elevation of B1



Photo 2: Northern elevation of B1



Photo 3: Eastern elevation of B2



Photo 4: B2 (internal)



Photo 5: Northern elevation of B3



Photo 6: Southern elevation of B3



Photo 7: Northern elevation of B4



Photo 8: South and west elevations of B5



Photo 9: Eastern elevation of B5



Photo 10: B6



Photo 11: Southern elevation of B6



Photo 12: Western elevations of B7 and B8



Photo 13: Northern elevation of B7



Photo 14: North and east elevations of B8



Photo 15: Gap behind uPVC weatherboarding on northern elevation of B8



Photo 16: Locked loft hatch preventing access to the loft void in B8

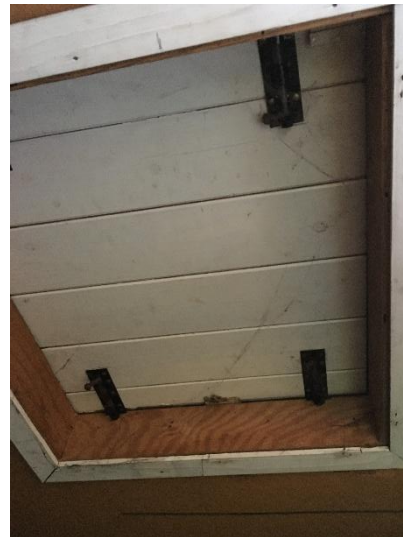


Photo 17: Eastern elevation of B9



Photo 18: Eastern elevation of B10



Photo 19: Northern elevation of B10



Photo 20: Eastern elevation of B11



Photo 21: Northern elevation of B11



Photo 22: Introduced shrub

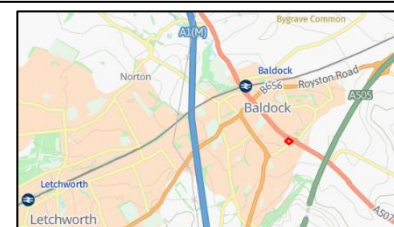


Photo 23: Hedgerow H1



Photo 24: Vegetated garden





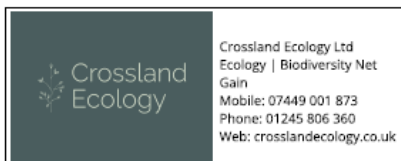
- Site boundary
- g4 Modified grassland
- u1 Vegetated garden
- u1b5 Building
- u1b6 Developed land
- h2b Non-native and ornamental hedgerow
- g4 203 Proposed trees

Deans Yard, Baldock

Appendix 6 - Proposed Habitat Plan

Ver	Date	Remarks	Drawn	Checked
1.2	16/05/2025	BNG	CB	SC

CrosslandEcology/DeansYard/BNG



Appendix 7: Statutory DEFRA Metric (appended separately)