

Biodiversity Net Gain Assessment: Design Stage

November 2025

Land East of Pirton

Prepared by
CSA Environmental

On behalf of
Gladman Developments Ltd

Report No: CSA/7345/03

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

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EXECUTIVE SUMMARY

Residential development is proposed at Land East of Pirton. Outline planning permission is sought from North Hertfordshire District Council, which will be subject to the Biodiversity Gain Condition in accordance with Schedule 14 of the Environment Act (2021).

CSA Environmental was instructed by Gladman Developments Ltd to undertake a 'Design Stage' Biodiversity Net Gain Assessment (BNGA) of the proposed development. The Statutory Biodiversity Metric Calculation Tool was used to determine pre- and post- development biodiversity values and predict the net effect of the proposed development upon biodiversity.

Baseline habitats at the Site comprise a temporary arable ley, existing road, neutral grassland field margins and boundary hedgerows ranging from very low to very high distinctiveness. No irreplaceable habitats are found on site or adjacent.

Post-development habitats at the Site will comprise residential development and infrastructure, and informal open space, consisting of grassland, scrub, chalk banks/scrapes and Sustainable Drainage Systems (SuDS).

A net gain of biodiversity is predicted for the proposed development of 0.28 Habitat Units (2.16%). This is below the 10% net gain requirement. A net gain of 1.38 Hedgerow Units (19.26%) is predicted. This is subject to enhancement of hedgerow H6. Trading rules have been met on-site for both habitats and hedgerows.

Residual losses of habitat units would be addressed through delivery of off-site biodiversity gains secured and registered on the biodiversity gain register.

Subject to securing the above through relevant legal mechanisms the Biodiversity Gain Condition could be discharged following grant of consent through submission of a Biodiversity Gain Plan.

To assist North Hertfordshire District Council in their consideration of BNG and the proposed development, relevant statements have been set out in Box 1 and 2 in respect of applicable BNG policy and legal requirements.

Box 1. Biodiversity Net Gain Statements
Planning permission sought for the development, if granted, would be subject to the Biodiversity Gain Condition as set out within Schedule 14 of the Environment Act (2021) given the following: • Planning permission is applied for after 12 February 2024 • Impacts to habitats are predicted on-site that either exceed 25 square metres per 5 linear metres with a value greater than zero, and/or impacts to any 'Section 41' habitat of principal importance • Planning permission sought does not relate to a 'householder application' or 'the high-speed railway transport network' • Planning permission is not for self-build or custom housebuilding and relates to more than 9 dwellings and/or proposals cover over 0.5ha • Planning permission does not relate directly to off-site gain developments to fulfil other BNG requirements
The biodiversity value of on-site habitats set out herein relate to the date of the planning application and not an earlier date.
The biodiversity value of on-site habitats set out herein are not lower than on date of application.
On-site biodiversity gain proposed herein is significant based upon the following: • Proposed habitats include creation of medium distinctiveness other neutral grassland, mixed scrub and individual trees; and enhancement of medium distinctiveness native hedgerow • Proposed habitats comprise large areas of low distinctiveness habitat comprising modified grassland
The Site does not contain irreplaceable habitat as defined under the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024).
As set out herein measures have been taken in a step-wise fashion to: • First avoid adverse effects of the development upon on-site medium or higher distinctiveness habitat and, where they cannot be avoided, the mitigate these effects; • Taking an approach to first seek on-site habitat enhancement, then habitat creation • Where above cannot fully compensate, seek registered off-site gains • And finally, where off-site gains cannot be secured, seeking purchase of biodiversity credits

Box 2. Accordance with 'Biodiversity Net Gain: Good Practice Principles for Development' (Baker et al., 2019).	
Principle 1. Apply the 'Mitigation Hierarchy'	Design decisions have been documented within the prepared EclA with consideration for the CIEEM Guidelines for Ecological Impact Assessment (EclA) (CIEEM, 2018) including mitigation hierarchy. Ecologically justified decisions have been taken for proposed habitats. The Biodiversity Gain Hierarchy has been followed, with habitats of medium or higher distinctiveness retained on-site where possible and mitigation of loss of habitats through enhancement and creation of on-site habitats.
Principle 2. Avoid losing biodiversity which cannot be offset by gains elsewhere (e.g., irreplaceable habitats).	No ancient woodland habitats are present on-site. Notable habitats and features (including native hedgerows) within and adjacent to the Site have been prioritised for protection as part of the proposed design.
Principle 3. Be inclusive & equitable	Open space design has sought to balance biodiversity benefits and access to nature, with recreational uses and delivery of housing.
Principle 4. Address risks (e.g., difficulty of achieving habitat creation/enhancement)	A precautionary approach has been taken to grassland habitat type and condition for on-site creation, with the highest provision comprising other neutral grassland in moderate condition.
Principle 5. Make a 'measurable' Net Gain contribution (e.g., calculated using an appropriate metric).	The Statutory Biodiversity Metric has been used to demonstrate a clear and quantified calculation of the net effect of development upon biodiversity, using habitat as a proxy for wider biodiversity.
Principle 6. Ensure that Net Gain design achieves the best outcomes for biodiversity (quantitative and qualitative assessment) and create a net gain legacy for long-term benefits.	Informal open space has been designed to include open grassland, buffering of hedgerows bounding the Site, and provision of SuDS features and chalk banks/scrapes to diversify habitats on site.
Principle 7. Be additional Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).	Informal Open Space has been designed to deliver biodiversity enhancement for the Site, in addition to providing the required levels of recreational and other public open space.
Principle 8. Create a Net Gain legacy Ensure Net Gain generates long-term benefits.	Habitat creation and enhancement at the Site will be subject to on-going management to ensure long-term benefits.
Principle 9. Optimise sustainability Optimise the wider environmental benefits for a sustainable society and economy.	Informal open space has been designed to provide wider environmental benefits for users of the Site, providing a combination of spaces for recreational use alongside those dedicated for wildlife and SuDS.
Principle 10. Be transparent Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	A full copy of the Statutory Biodiversity Metric calculation tool and Condition Assessments will be provided alongside this report for transparency with regard to how the BNG for the Site has been calculated.

1.0 INTRODUCTION

- 1.1 This report has been prepared by CSA Environmental on behalf of Gladman Developments Ltd and sets out the findings of a 'Design Stage' Biodiversity Net Gain (BNG) Assessment. Residential development is proposed at Land East of Pirton (hereafter 'the Site'). This report details the predicted net effect of the proposed development upon biodiversity.
- 1.2 This report has been prepared with due consideration for the Chartered Institute of Ecology and Environmental Management's guidance for design stage reporting on Biodiversity Net Gain (CIEEM, 2021). The report also takes into account wider CIEEM best-practice guidance (2017 & 2018), Biodiversity Net Gain: Good Practice Principles for Development (Baker et al., 2019) and the Biodiversity: Code of Practice for Planning and Development, published by the British Standards Institute (BS 42020:2013).
- 1.3 The Site occupies an area of c. 6.65ha and comprises a single arable field currently in a ley and boundary hedgerows (see Habitats Plan in Appendix A). The Site is located around central grid reference TL 15261 31907, to the east of Pirton.
- 1.4 This report should be read in conjunction with the Ecological Impact Assessment (EclA) (CSA/7345/02) prepared for the proposed development which provides full baseline habitat information upon which the post-development biodiversity value set out herein is based.
- 1.5 This 'Design Stage' BNG Assessment aims to:
 - Confirm whether planning permission sought for the development, if granted, would be subject to the Biodiversity Gain Condition as set out within the Environment Act (2021) [see Box 1].
 - Provide information about "...the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat". Furthermore, evidence is provided as to how the Biodiversity Gain Hierarchy, as set out in as set out in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024), has been applied.
 - Establish the following using the Statutory Biodiversity Metric Calculation, which uses habitat as a proxy for biodiversity and comprises three separate modules (Habitat Units, Hedgerow Units & Watercourse Units):
 - 'pre-development' (baseline) biodiversity value of the Site
 - 'post-development' (post-intervention) biodiversity value of the Site
 - Any off-site biodiversity values (baseline & post-intervention)
 - Net effect of the proposed development

- Whether relevant 'trading' rules and other controls have been accorded with
 - Whether the Biodiversity Gain Objective (10%) is met or not
 - State whether "...the biodiversity value of the on-site habitat will be lower on the date of application (or an earlier date) because of the carrying on of activities ('degradation') in which case the value is to be taken as immediately before the carrying on of the activities, and if degradation has taken place supporting evidence of this".
 - State whether any on-site biodiversity provision is 'significant' and if so, how the specific gains would be secured for 30 years, in accordance with Paragraph 9, Schedule 7A of the Town & Country Planning Act (1990).
 - Confirm the presence and location of any irreplaceable habitat at the Site, as set out in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024).
 - Clearly identify any assumptions made or deviation from the Statutory Biodiversity Metric Guidance.
 - Detail any legal frameworks for how Biodiversity Net Gain would be secured subject to grant of planning permission.
- 1.6 In accordance with the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations (2024) the following drawings have also been prepared:
- Baseline Habitats Plan (CSA/7345/112) provided in Appendix A
 - Proposed Habitats Plan (CSA/7345/113) provided in Appendix B
- 1.7 A Biodiversity Gain Plan would be prepared to discharge the Biodiversity Gain Condition following the grant of any relevant consent.

2.0 PLANNING POLICY & LEGISLATION

2.1 The following legislation brings into force Schedule 14 of the Environment Act (2021), making Biodiversity Net Gain (BNG) a condition of planning permission in England from 12 February 2024:

- 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 Site Register 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

2.2 The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing & Communities, 2023) sets out existing government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, paragraph 180, states that the planning system and planning policies should minimise impacts on and provide net gains for biodiversity.

2.3 Accompanying the NPPF, central government guidance on the implementation of planning policies is set out within online Planning Practice Guidance (PPG). That relating to the protection and enhancement of the Natural Environment was most recently updated in February 2024. The Natural Environment PPG addresses principles across a broad spectrum of topics targeting biodiversity conservation, from individual site and species protection through to the supporting of ecosystem services, and the use of local ecological networks to support the national Nature Recovery Network. In particular, the PPG promotes the delivery of measurable Biodiversity Net Gain through the creation and enhancement of habitats alongside development.

2.4 The following policy from the North Hertfordshire Local Plan makes reference to biodiversity and the protection and enhancement of priority habitats and species:

Policy SP1: Sustainable development in North Hertfordshire

"This Plan supports the principles of sustainable development within North Hertfordshire. We will:

- a) Maintain the role of key settlements within and adjoining the District as the main focus for housing, employment and new development making use of previously developed land where possible;*

- b) *Ensure the long-term vitality of the District's villages by supporting growth which provides opportunities for existing and new residents and sustains key facilities;*
- c) *Grant planning permission for proposals that, individually or cumulatively:*
 - i. *deliver an appropriate mix of homes, jobs and facilities that contribute towards the targets and aspirations in this Plan;*
 - ii. *create high-quality developments that respect and improve their surroundings and provide opportunities for healthy lifestyle choices;*
 - iii. *provide the necessary infrastructure required to support an increasing population;*
 - iv. *protect key elements of North Hertfordshire's environment including biodiversity, important landscapes, heritage assets and green infrastructure (including the water environment); and*
 - v. *secure any necessary mitigation measures that reduce the impact of development, including on climate change; and*

Support neighbourhood plans and other local planning initiatives where they are in general conformity with the strategic policies of this Local Plan."

Policy SP12: Green infrastructure, landscape and biodiversity

"We will accommodate significant growth during the plan period whilst ensuring the natural environment is protected and enhanced. We will:

- a) *Protect, identify, manage and where possible enhance a strategic multi-functional network of green infrastructure;*
- b) *Consider and respect landscape character, scenic beauty and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty;*
- c) *Protect, enhance and manage designated sites in accordance with the following hierarchy of designations and features:*
 - *Internationally designated sites*
 - *Nationally designated sites*
 - *Locally designated sites;*

- Non-designated sites that include important habitats and species
- d) *Protect, enhance and manage biodiversity networks including wildlife corridors, ancient woodlands and hedgerows, wetland and riverine habitats, Local Geological Sites, protected species, priority species and habitats, and non-designated sites of ecological value and ensure measurable net gains for biodiversity; and*

Protect other open spaces and support provision of new and improved open space."

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."

3.0 METHODS

Biodiversity Calculations

- 3.1 The Statutory Biodiversity Metric (Defra, 2024) was used to determine baseline (pre-development) and post-intervention (post-development) biodiversity values, and to calculate the net effect of the development upon biodiversity. Specifically, the Statutory Biodiversity Metric Calculation Tool was populated and used to run all calculations present herein, and in accordance with the Statutory Metric User Guide (Defra, 2024).
- 3.2 The Statutory Biodiversity Metric uses habitat (vegetation and edaphic conditions) as a proxy for measuring biodiversity more widely. This reductive approach allows for the relative biodiversity 'value' of land to be calculated and expressed as transferrable 'Biodiversity Units'. The metric adopts the UK Habitat Classification (UK Hab; Butcher et al., 2023) system with some minor deviation.
- 3.3 The metric consists of a primarily 'Area' module which calculates 'Habitat Units' such as grassland, woodland and urban habitats, as well as two linear modules for 'Hedgerow Units' (including lines of trees) and 'Watercourse Units' (including rivers, canals and ditches). The separate Biodiversity Unit types cannot be converted between these modules and are addressed separately herein. For the purposes of this report watercourses modules were not populated given the absence of these linear features from the Site.
- 3.4 'Habitat trading' controls are integrated into the Statutory Metric to ensure any losses of habitat are mitigated or compensated for appropriately, in respect of conservation priorities and ecological functionality. Any deviation from habitat trading is cleared flagged within the Statutory Metric, and justifications, where necessary, are set out herein.
- 3.5 Any consideration of temporary impacts, those where habitats can be reinstated within 2 years of impacts as set out within the User Guide, will be explained in full herein.
- 3.6 A Statutory Biodiversity Metric Calculation Tool has been prepared for the proposed development and is provided separately in full for interrogation by North Hertfordshire District Council, relevant consultees and stakeholders.
- 3.7 All metric calculations have been reviewed by Jamie Woollam CEcol MCIEEM who has completed numerous net gain assessments.

Baseline Habitats

- 3.8 The accompanying EclA report (CSA/7345/02) provides details of the UKHab survey undertaken at the Site on 17 January 2025 including full survey methods.
- 3.9 Baseline (pre-development) habitat areas and linear measurements were taken from the Baseline Habitats Plan (Appendix A) prepared in mapping software Quantum Geographic Information Systems (QGIS). Mapping is based upon field survey, topographical survey, aerial photography and OS mapping to an accuracy of 10m²/0.001ha (polygons) and 5m (linear).

Habitat & Hedgerow Condition Assessment

- 3.10 Habitats on-site do not require condition assessments.
- 3.11 An assessment of hedgerow condition was undertaken on 25 April 2025 by Rhodri Gruffydd (FISC Level 3) and an assessment of neutral grassland field margins on 21 October 2025, in accordance with the Statutory Metric User Guide (Defra, 2024). Published condition assessment templates have been completed and are provided in Appendix C alongside wider condition information.

Post-Development Habitats

- 3.12 Post-development habitat areas and linear measurements were taken from the Proposed Habitats Plan (Appendix B) prepared in mapping software QGIS. This plan is based upon the Development Framework Plan prepared by Icen Projects Limited (plan ref: I000652_DL02_DFP_REVD) on behalf of Gladman Developments Ltd. Wider consideration of construction methods, future land-use and management were used to determine the extent of existing habitat loss/deterioration, retention/enhancement and creation which would occur-post development.
- 3.13 Professional judgement was required throughout the calculation process to ensure target habitats were reasonable, achievable and ecologically justified. Habitat condition for both enhanced and created habitats was assigned taking a precautionary approach and with consideration of biotic and operational phase conditions (i.e. those which may limit the extent to which 'good' condition is likely to be reached).

Strategic Significance

- 3.14 A desktop assessment was undertaken to determine relevant strategic significance multipliers for pre- and post-development habitats in accordance with Table 7 of the Statutory Metric User Guide (Defra, 2024) with particular consideration of Local Nature Recovery Strategies (LNRS).

Additionality & Wider Considerations

3.15 In accordance with the good practice principles as set out above, the following additional considerations have been given:

- Wider consideration of ecological functionality, with a qualitative ecological assessment presented herein
- Consideration of non-ecological stakeholders, such as end-users (e.g. residents) of the scheme and choices with regard to access and multi-functionality
- Identification of opportunities to deliver wider environmental gain (e.g. carbon sequestration, water quality and climate resilience) guiding habitat/design choices beyond certain ecological outcomes

Assumptions & Limitations

3.16 Effort has been taken to ensure mapping, and measurements taken from mapping, are accurate to the level stated. However, given the nature of habitats, methods of field survey and the potential for inaccuracies in aerial photography and some other mapping, there remain some potential for errors in the calculations presented herein.

3.17 Professional judgement and a precautionary approach are required to establish baseline and post-development scenarios to assess current habitat type and condition, and to predict future changes. Accordingly, outcomes for habitats and biodiversity more widely may differ from those presented herein.

3.18 Specific assumptions with regard to certain existing and proposed habitats have been identified where relevant throughout the report.

3.19 The condition assessment for the neutral grassland field margins was conducted outside the optimal botanical survey season. However, these areas had not been cut prior to the survey and habitats were informally checked throughout the botanical season for any species of interest. Therefore, it is considered only a minor limitation to the assessment and not deemed to affect the outcome.

4.0 BASELINE BIODIVERSITY

- 4.1 For full habitat descriptions and species lists, please refer to the EcIA (CSA/7345/02) with baseline habitats illustrated on the Habitats Plan (Appendix A). Appendix C sets out full details of condition assessments including completed standard templates.

Strategic Significance

- 4.2 There is no published Local Nature Recovery Strategy (LNRS) for Hertfordshire. However, the Hertfordshire Ecological Network Map provided for the Site has been reviewed in respect of assigning significant strategic significance. The majority of the Site falls within the 'non-strategic zone' (3c category). However, part of the Site falls within the 'semi-strategic zone' (3b category). Given there are no existing ecologically important habitats at the Site, all of the baseline habitat units are assigned as 'Low' strategic significance as per the Statutory Metric User Guide (Defra, 2024).
- 4.3 The above approach has also been adopted for post-intervention (post-development) habitat units as set out below.

Baseline Biodiversity Units

- 4.4 A summary of the on-site habitat areas and baseline Biodiversity Units, as calculated using the accompanying Statutory Biodiversity Metric are set out in Table 1 below. These include Habitat and Hedgerow Units.

Table 1. Summary of On-site Baseline Biodiversity Units

HABITATS		
Habitat Type (Assumed Condition)	Area (ha)	Habitat Units
Temporary grass and clover leys	6.30	12.60
Developed land; sealed surface	0.21	0.00
Other neutral grassland	0.14	0.56
Total	6.65ha	13.16
HEDGEROWS		
Hedgerow Type	Length (km)	Hedgerow Units
H1 Non-native and ornamental hedgerow	0.04	0.04
H2 Species-rich native hedgerow with trees – associated with bank or ditch (moderate)	0.11	1.76
H3 Native hedgerow (moderate)	0.26	1.04
H4 Native hedgerow (good)	0.41	2.46
H5 Species-rich native hedgerow (poor)	0.13	0.52
H6 Native hedgerow – associated with bank or ditch (moderate)	0.17	1.36
Total	1.12km	7.18

- 4.5 The entire Site area comprises 'low' and 'very low' distinctiveness habitats, with temporary grass and clover leys contributing all of the biodiversity value.

- 4.6 The native hedgerows on-site are of 'low' to 'very high' distinctiveness, with the 'very high' distinctiveness hedgerow covering 0.11km in length.

5.0 POST-INTERVENTION BIODIVERSITY

- 5.1 The proposed development comprises the construction of c. 130 dwellings with associated private gardens, access infrastructure, SuDS features and c. 2.40ha of green infrastructure.

- 5.2 Post-intervention habitats are illustrated on the Proposed Habitats Plan in Appendix B. This drawing is based upon development parameters set out within Development Framework Plan prepared by Icen Projects Limited (plan ref: I000652_DL02_DFP_REVD) on behalf of Gladman Developments Ltd. The following assumptions have been made with regard to these plans in line with the Statutory Metric User Guide (Defra, 2024) and professional judgement taking a precautionary approach where necessary:

- Residential development parcels are assumed to comprise 70% dwellings and built form, with 30% private gardens and incidental open space
- All individual trees are assumed to be 'small' in size, and in poor condition for 'urban'/street contexts and moderate condition for 'rural' contexts
- The public open space is assumed to comprise modified grassland in poor condition, other neutral grassland in moderate condition and mixed scrub in moderate condition
- The foul pumping station is assumed to be developed land; sealed surface
- The SuDS basins is assumed to be in moderate condition and other neutral grassland banks in moderate condition
- Chalk banks/scrapes are assumed to be too small to map

- 5.3 On-site habitat retention, enhancement and creation set out below would be secured through control of detailed development/landscape design, a Habitat Management & Monitoring Plan (HMMP) and appropriate application of a planning condition or legal condition.

Habitat Retention & Enhancement

- 5.4 The majority of area habitats at the Site will be lost to development, comprising principally temporary grass ley. Other than a small section of hedgerow removed for access, all hedgerows will be retained, with H6 enhanced.

- 5.5 As set out within the accompanying EclA the retention of these habitats will require protections during construction and in operation through the following:
- Tree protection measures in line with standard arboricultural practice (BS5837: 2012)
 - Construction Environmental Management Plan, to include standard pollution control measures to be implemented during construction
 - Landscape and Ecology Management Plan
- 5.6 Enhancement works would be delivered and secured through a Habitat Management and Monitoring Plan (HMMP).

Habitat Creation

- 5.7 As part of the proposed development a range of habitats will be created including residential dwellings and associated infrastructure, vegetated gardens and incidental greenspace, and public open space to include grassland, scrub and trees.

Strategic Significance

- 5.8 An equivalent approach to strategic significance as been taken for post-intervention Biodiversity Units as for baseline units above, with all habitats having 'low' strategic significance.

Significant On-site Gain

- 5.9 The following proposed habitat enhancement and creation proposals are likely to be considered 'significant' by North Hertfordshire District Council:
- Creation of habitats of medium distinctiveness, including other neutral grassland, individual trees and mixed scrub
 - Enhancement of hedgerow H6 to moderate condition
- 5.10 In accordance with Paragraph 9, Schedule 7A of the Town & Country Planning Act (1990) these habitats contributing to significant on-site gains require additional mechanisms to secure their creation/enhancement and management over 30-years, such as through an appropriate planning condition and/or legal agreement in accordance with an on-site HMMP.

6.0 NET EFFECT ON BIODIVERSITY

Biodiversity Units

- 6.1 The net effect on biodiversity as a result of the proposed development is set out within the accompanying Statutory Biodiversity Metric and summarised below in Tables 2A and 2B.

Table 2A. Net Effect on Biodiversity: Habitat Units

	Habitat Units	% Change
On-site baseline	13.16	
On-site post-intervention	13.44	
On-site net change	0.28	2.16%
Total net change	+0.28	+2.16%
<i>Trading Rules Satisfied</i>		

Table 2B. Net Effect on Biodiversity: Hedgerow Units

	Hedgerow Units	% Change
On-site baseline	7.18	
On-site post-intervention	8.56	
On-site net change	1.38	+19.26%
Total net change	+1.38	+19.26%
<i>Trading Rules Satisfied</i>		

- 6.2 It is demonstrated that the proposed development will result in a net gain of 2.16% for Habitat Units, below the 10% net gain requirement. A net gain of 19.26% for Hedgerow Units is demonstrated. All relevant trading rules have been satisfied.

Habitat Coverage

- 6.3 The net change in cover (area and linear) for broad and priority habitat is summarised in Table 3 below.

Table 3. Net Effect Habitat Coverage

	Area (ha)/Length (km) change	% Change
Urban	+ 4.40 ha	+ 1,955 %
Cropland	- 6.30 ha	- 100 %
Grassland	+ 1.53 ha	+ 1092 %
Scrub	+ 0.54 ha	+ 100 %
Trees	+ 0.42 ha	+ 100 %
Hedgerow (priority habitat)	- 0.01 km	- 0.9 %

- 6.4 The proposed development will result in a significant increase in grassland and urban habitats, and a net loss in arable land.
- 6.5 A very small net loss of priority hedgerow habitat is predicted due to small section removed for access. However, hedgerow H6 will be enhanced.

Qualitative Appraisal

- 6.6 A wider appraisal of the proposed development's effects upon biodiversity is set out below in Table 4 below. This includes factors not fully captured through the Statutory Biodiversity Metric, which uses only habitat type and condition as a proxy for biodiversity, omitting important factors such as connectivity and functioning of habitats.

Table 4. Qualitative Appraisal of effects upon Biodiversity

Ecological Features, Functions & Factors	Baseline Conditions	Potential Effects
Habitat Connectivity	Arable land at the Site contributes little to local ecological networks, with the exception of field hedgerows to the boundaries of the Site.	Residential development will impede habitat connectivity through the Site for many species. Garden habitats provide some ancillary benefits to certain mobile species. New scrub to the peripheries of the Site, and enhancement of hedgerow H6 will provide some increase in habitat connectivity for certain species, contributing to wider ecological networks. Chalk banks/scrapes will provide some habitat connectivity for chalk grassland specialist plants and invertebrates.
Structural Diversity	The Site has very limited habitat structure with little or no interfaces between hedgerow and grassland habitats.	Proposed development and landscaping on-site will increase the structural diversity of habitat at the Site. Interfaces between formal (short mown) and informal habitats, as well as between broad habitat types (grassland, scrub and hedgerows) will provide a greater number of opportunities for biodiversity, at a range of scales.
Habitat Mosaics	The Site has a very low diversity of habitats.	Proposed development and habitats on-site will increase the number of habitat types and their structural diversity. The combination of grassland, scrub and trees will provide a medium-scale mosaic of habitat to benefit biodiversity. Chalk banks/scrapes, with a short sward will also contribute to the mosaic.
Soil Biodiversity	Arable land which dominates the Site has been subject to frequent chemical inputs (fertiliser, pH correction and herbicides) and physical disturbance. The soil biota is likely to be significantly impacted by such works, reducing soil carbon, other nutrient cycling and wider environmental benefits.	Residential development will include the loss and damage of soils to built form and will prevent natural functioning of this habitat. Where grassland is managed with appropriate removal of arisings, substantive benefits are anticipated to soil environments and biodiversity resulting from lower nutrient levels in these areas.

7.0 MANAGEMENT & MONITORING

7.1 Full details of management and monitoring for delivery of on-site biodiversity gains will be provided within a Habitat Monitoring and Management Plan (HMMP) for a 30-year period. This HMMP will include the following principal elements:

- Establishment and management of the following 'significant' biodiversity gains:
 - Other neutral grassland, scrub and trees within informal open spaces and SuDS features
 - Hedgerow enhancement measures
- Adaptive management options
- Monitoring regime and reporting process
- Roles and responsibilities
- Processes to ensure remedial measures can be undertaken in the event that target habitat or condition is not achieved

8.0 SUMMARY & CONCLUSIONS

- 8.1 Planning permission sought for the proposed development will be subject to the Biodiversity Gain Condition in accordance with Schedule 14 of the Environment Act (2021).
- 8.2 As set out herein, a net gain in biodiversity is predicted as a result of the proposed development. The Statutory Biodiversity Metric Calculation Tool was used to calculate the following outcomes:
- +0.28 Habitat Unit gain or +2.16%
 - +1.38 Hedgerow Unit gain or +19.26%
 - Trading rules are satisfied for habitat and hedgerow units
- 8.3 Following any grant of planning permission an application to discharge the Biodiversity Gain Condition would be submitted completing the Biodiversity Gain Plan.
- 8.4 On-site significant biodiversity gain would be secured through an appropriate legal mechanism (as such planning condition) subject to an on-site HMMP for a 30-year period. Off-site Biodiversity Units would be secured through registration under the Biodiversity Gain Register, and subject to a separate off-site HMMP

9.0 REFERENCES

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Appendix A

Baseline Habitats Plan



- Site boundary
- Temporary grass and clover leys (c1b)
- Developed land, sealed surface (u1b)
- Other neutral grassland (g3c)
- Native hedgerows (h2a)
- Non-native and ornamental hedgerows (h2b)



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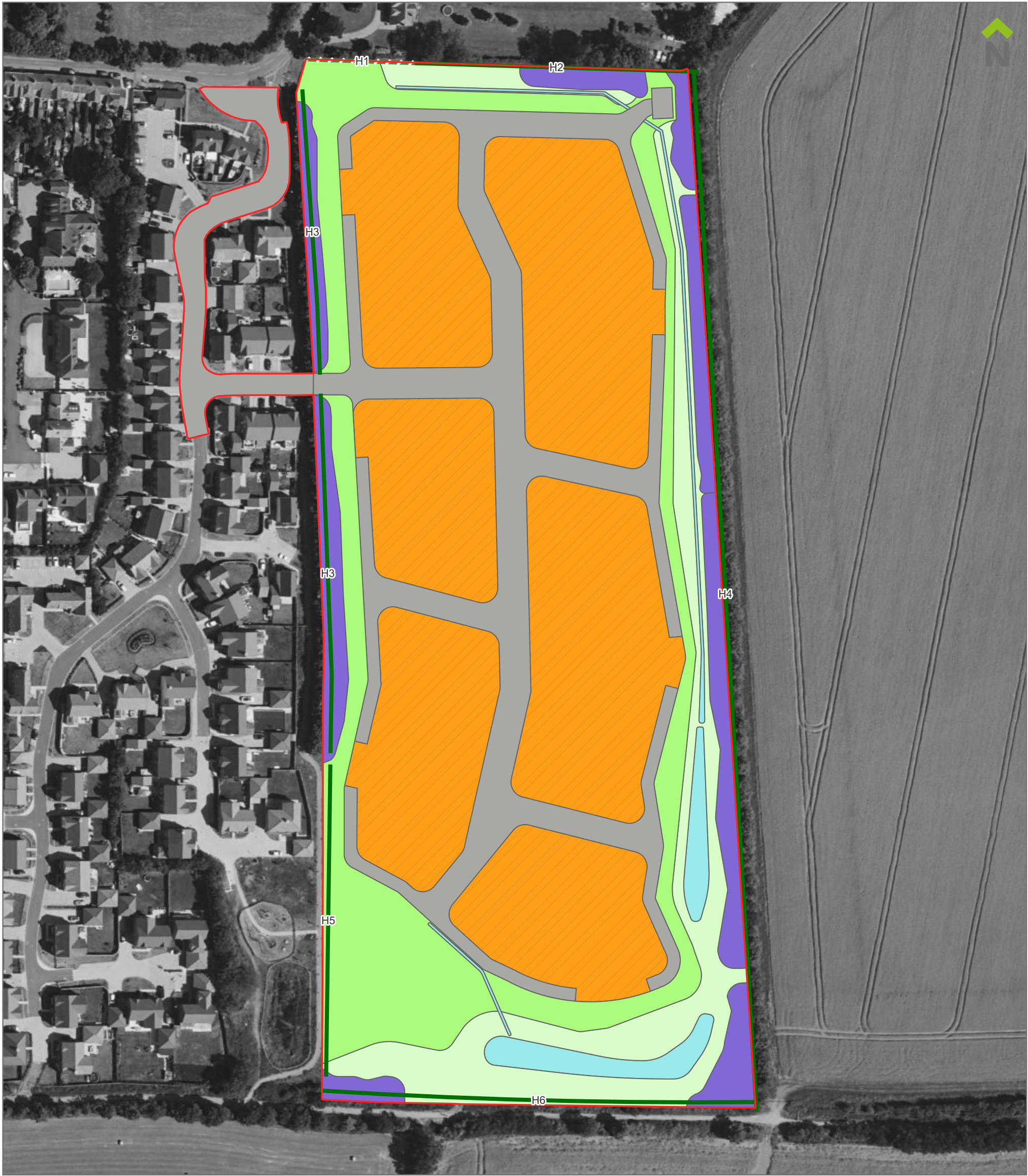


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Project	Land East of Pirton	Date	October 2025	Drawing No.	CSA/7345/112
Drawing Title	Baseline Habitats Plan	Scale	1:1500 on A3	Rev	D
Client	Gladman Developments Ltd	Drawn	RG	Checked	JW

Appendix B

Proposed Habitats Plan



- Site boundary
- Development parcel:
70% developed land
30% gardens
- Access infrastructure
(Developed land, sealed surface (u1b))
- Modified grassland (g4)
- Other neutral grassland (g3c)
- Mixed scrub (h3h)
- Attenuation ponds (SuDS)

- Native hedgerows (h2a)
Note: H6 is to be enhanced
- Non-native and ornamental hedgerows (h2b)

Trees are not shown but will include:
49 small urban trees in the development area
55 small rural trees in the Public Open Space

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Project	Land east of Pirton	Date	May 2025	Drawing No.	CSA/7345/113
Drawing Title	Proposed Habitats Plan	Scale	1:1500 on A3	Rev	B
Client	Gladman Developments Ltd	Drawn	RG	Checked	JW

Appendix C

Condition Assessments

Condition Sheet: GRASSLAND Habitat Type (medium, high and very high distinctiveness)				
UK Habitat Classification (UKHab) Habitat Types				
Grassland - Lowland calcareous grassland Grassland - Lowland dry acid grassland Grassland - Lowland meadows Grassland - Other lowland acid grassland Grassland - Other neutral grassland Grassland - Tall herb communities (H6430) [Not to be confused with the Tall forbs secondary code – see UKHab guidance for details.] Grassland - Upland acid grassland Grassland - Upland calcareous grassland Grassland - Upland hay meadows Sparsely vegetated land - Calaminarian grassland				
Habitat Description				
ukhab – UK Habitat Classification				
On-site or off-site, site name and location	Land East of Pirton	Survey date and Surveyor name		21/10/2025 Laura Farrar
		Survey reference (if relating to a wider survey)		
Limitations (if applicable)		Habitat parcel reference		
		North field margin	South-west field margin	
Condition Assessment Criteria		Grid reference		
		Criterion passed (Yes or No)		Notes (such as justification)
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type (and relative to Footnote 3 suboptimal species which may be listed in the UKHab description).¹ Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	No	No	Species-poor and grass dominated, proportion of indicator species relative to sub-optimal species is low
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	No	No	
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens ² .	Yes	Yes	
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	No	Yes	Bramble scrub encroachment exceeds 5% for north field margin
E	Combined cover of species indicative of suboptimal condition³ and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species⁴ (as listed on Schedule 9 of WCA⁵) are present, this criterion is automatically failed.	No	No	Creeping thistle, broad-leaved dock and creeping buttercup exceed 5%
Additional Criterion - must be assessed for all non-acid grassland types				
F	There are 10 or more vascular plant species per m² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	No	No	c. 5-6 spp.
Essential criterion for Good condition achieved (for non-acid grassland) (Yes or No)		No	No	
Number of criteria passed		1	2	
Condition Assessment Res	Condition Assessment Score	Score Achieved x/√		
Non-acid grassland types (Result out of 6 criteria)				

Passes 5 or 6 criteria, including essential criterion A and additional criterion F.	Good (3)			
Passes 3 - 5 criteria, including essential criterion A.	Moderate (2)			
Passes 2 or fewer criteria; OR Passes 3 or 4 criteria excluding criterion A and F.	Poor (1)	X	X	
Suggested enhancement interventions to improve condition score				
Notes				
Footnote 1 - Professional judgement should be used alongside the UKHab description. Footnote 2 – For example, this could include small, scattered areas of bare ground allowing for plant colonisation, or localised patches not exceeding 5% cover. Footnote 3 - Species indicative of suboptimal condition for this habitat type include: creeping thistle <i>Cirsium arvense</i> , spear thistle <i>Cirsium vulgare</i> , curled dock <i>Rumex crispus</i> , broad-leaved dock <i>Rumex obtusifolius</i> , common nettle <i>Urtica dioica</i> , creeping buttercup <i>Ranunculus repens</i> , greater plantain <i>Plantago major</i> , white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i> . There may be additional relevant species local to the region and or site. Footnote 4 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, by applying professional judgement. Footnote 5 – Wildlife and Countryside Act 1981 (as amended).				

Habitat Type										
Native hedgerow Native hedgerow - associated with bank or ditch Native hedgerow with trees Native hedgerow with trees - associated with bank or ditch Species-rich native hedgerow Species-rich native hedgerow - associated with bank or ditch Species-rich native hedgerow with trees Species-rich native hedgerow with trees - associated with bank or ditch										
Habitat Description										
See the Statutory Biodiversity Metric Technical Annex 2 and UK Habitat Classification:										
On-site or off-site, site name and location		Land East of Pirton		Survey date and Surveyor name		25/04/2025 Rhodri Gruffydd				
Limitations (if applicable)				Survey reference (if relating to a wider survey)						
Condition Assessment Details										
A series of ten attributes, representing key physical characteristics are used for this assessment. Each attribute is assigned to one of five functional groups (A – E) and the condition of a hedgerow is assessed according to the number of attributes from these functional groups which pass or fail the 'favourable condition' criteria. This assessment is based on the Hedgerow Survey Handbook ¹ and Favourable Conservation Status document ² . For further clarification please refer to the Hedgerow Survey Handbook. Best practice would be to record the species, age, spacing and other key information about all trees present along a hedgerow within the 'Habitat Description' box, as well as other key features of the hedgerow.										
Hedgerow favourable condition attributes										
Attributes and functional groupings (A, B, C, D and E)		Criteria - the minimum requirements for 'favourable condition'		Criteria description		Habitat parcel reference				
						H2	H3	H4	H5	H6
						Grid reference				
Core groups - applicable to all hedgerow types					Criterion passed (Yes or No)					Notes (such as justification)
A1.	Height	>1.5 m average along length	The average height of woody growth estimated from base of stem to the top of the shoots, excluding any bank beneath the hedgerow, any gaps or isolated trees. Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice). A newly planted hedgerow does not pass this criterion (unless it is >1.5 m height).	Yes	Yes	Yes	No	Yes	H5 newly planted	
A2.	Width	>1.5 m average along length	The average width of woody growth estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths (such as blackthorn <i>Prunus spinosa</i> suckers) are only included in the width estimate when they are >0.5 m in height. Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice).	Yes	Yes	Yes	No	Yes	H5 newly planted	
B1.	Gap - hedge base	Gap between ground and base of canopy <0.5 m for >90% of length	This is the vertical 'gappiness' of the woody component of the hedgerow, and its distance from the ground to the lowest leafy growth. Certain exceptions to this criterion are acceptable (see page 65 of the Hedgerow Survey Handbook).	Yes	Yes	Yes	No	Yes	H5 newly planted	
B2.	Gap - hedge canopy continuity	Gaps make up <10% of total length; and No canopy gaps >5 m	This is the horizontal 'gappiness' of the woody component of the hedgerow. Gaps are complete breaks in the	Yes	Yes	Yes	No	No	H5 newly planted H6 very gappy	
C1.	Undisturbed ground and perennial vegetation	>1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: - Measured from outer edge of hedgerow; and - Is present on one side of the hedgerow (at least).	This is the level of disturbance (excluding wildlife disturbance) at the base of the hedgerow. Undisturbed ground is present for at least 90% of the hedgerow length, greater than 1 m in width and must be present along at least one side of the hedgerow. This criterion recognises the value of the hedgerow base as a boundary habitat with the capacity to support a wide range of species. Cultivation, heavily trodden footpaths, poached ground etc. can limit available habitat niches.	Yes	No	Yes	No	No	H3, H5, H6 next to paths	
C2.	Nutrient-enriched perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground.	The indicator species used are nettles <i>Urtica</i> spp., cleavers <i>Galium aparine</i> and docks <i>Rumex</i> spp. Their presence, either singly or together, does not exceed the 20% cover threshold.	No	No	Yes	Yes	No	nettle and cleavers along much of the hedgerows that failed	

D1.	Invasive and neophyte species	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA ¹) and recently introduced species.	Recently introduced species refer to plants that have naturalised in the UK since AD 1500 (neophytes). Archaeophytes count as natives. For information on archaeophytes and neophytes see the JNCC website ² , as well as the BSBI website ³ , where the	Yes	Yes	Yes	Yes	Yes
D2.	Current damage	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities	This criterion addresses damaging activities that may have led to or lead to deterioration in other attributes.	Yes	Yes	Yes	Yes	Yes

The hedgerow condition assessment generates a weighting (score) ranging from 1 - 3, which is used within the Statutory Biodiversity Metric. The scores for each are set out in the tables below.

Condition categories for hedgerows with trees						
Category	Category Requirements	Metric Score				
Good	No more than 2 failures in total; AND No more than 1 failure in any functional group.			X		
Moderate	No more than 4 failures in total; AND <u>Does not fail both attributes</u> in more than one functional group (for example, fails attributes A1, A2, B1 and C2 = Moderate condition).		X			X
Poor	Fails a total of more than 4 attributes; OR <u>Fails both attributes</u> in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).				X	
Score achieved:			Moderate	Good	Poor	Moderate
Condition categories for hedgerows with trees						
Category	Category Requirements	Metric score				
Good	No more than 2 failures in total; AND No more than 1 failure in any functional group.					
Moderate	No more than 5 failures in total; AND <u>Does not fail both attributes</u> in more than one functional group (for example, fails attributes A1, A2, B1, C2 and E1 = Moderate condition).		X			
Poor	Fails a total of more than 5 attributes; OR <u>Fails both attributes</u> in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).					
Score achieved:		Moderate				
Suggested enhancement interventions to improve condition score						

Suggested enhancement interventions to improve condition score

Footnotes

Footnote 1 – DEFRA (2007) *Hedgerow Survey Handbook. A standard procedure for local surveys in the UK.* [online] Available on: [layout \(hedgelink.org.uk\)](http://layout.hedgelink.org.uk)

Footnote 2 – STALEY, J.T. ET AL. (2020) *Definition of Favourable Conservation Status for Hedgerows*. [online] Available on: https://www.naturalengland.org.uk/Data/Assets/2020/06/20200623_FCS_Hedgerows.pdf

Footnote 3 – Wildlife and Countryside Act 1981 (as amended).

Footnote 5 – Wildlife and Countryside Act 1981 (as amended).

Footnote 4 – CHEFFINGS, C. M. et al. (2005) *The Vascular Plant Red Data List for Great Britain*. Species Status 7: 1-116. [online] Available on: [The Vascular Plant Red Data List for Great Britain \(Species Status No. 7\)](#) JNCC Resource Hub

Footnote 5 – BOTANICAL SOCIETY OF BRITAIN AND IRELAND (BSBI). *Definitions: wild, native or alien?* [online] Available on: <http://www.bsbi.org>

Footnote 6 – BSBI and Biological Records Centre (BRC) (2022) *Online Atlas of the British and Irish Flora*. [online] Available on: <https://www.brc.ac.uk/>

Footnote 7 – GB NON-NATIVE SPECIES SECRETARIAT (GBNNS) (2022) Available on: [Home » NNS \(nonnativespecies.org\)](https://www.gov.uk/guidance/non-native-species-secretariat)

Footnote 8 – See gov.uk standing advice on ancient and veteran trees. Available from: [Keepers of time: ancient and native woodland and trees policy in England \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/ancient_and_veteran_trees_policy_in_England.pdf)

[Keepers of time: ancient and native woodland and trees policy in England \(publishing.service.gov.uk\)](https://www.gov.uk/guidance/keeping-ancient-woodland-and-ancient-trees-policy-in-england)
and
[Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions)



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