



18/02/2025

To Whom It Concerns,

Land Adjacent 2 and 3 Wells Cottages, Smiths End Lane, Barley, Hertfordshire, SG8 8LJ

We note the concerns raised regarding the adequacy of information provided to support the UK Habitat Classification assessment, habitat condition assessment, and subsequent BNG calculations. We respond to each point below.

1. Habitat Distinctiveness and Supporting Data

The habitat types have been classified in accordance with the UK Habitat Classification (UKHab) methodology by a suitably qualified ecologist. The level of survey effort undertaken was proportionate to the scale, context, and ecological value of the site, in line with CIEEM guidance.

For the habitats present, classification to the relevant UKHab type did not require quadrat data to establish distinctiveness. Under the Statutory Biodiversity Metric, distinctiveness is assigned according to habitat type, not derived from quadrat frequency data. Quadrat surveys are typically necessary where detailed botanical differentiation is required (e.g. semi-improved versus species-rich grassland). In this case, the habitats were readily identifiable and did not present ambiguity requiring quadrat-based analysis.

While full species lists were not appended to the original submission, field observations and target notes informed both classification and condition assessments. A summary species list can be provided if required.

2. Habitat Condition Assessment

Condition assessments were undertaken in accordance with the Statutory Biodiversity Metric condition criteria.

For grassland habitats, one of the key indicators of poor condition is low species richness.

The habitats on site fall below this threshold and are therefore appropriately categorised as



being in poor condition.

Given this low species richness, the quadrat data would not materially alter the condition outcome. Where species diversity is clearly limited and characteristic of modified or species-poor swards, the habitat can reasonably be assessed as poor condition without the need for detailed quadrat frequency analysis.

Furthermore, for the habitats present, condition criteria are primarily based on observable structural attributes (e.g. sward composition, management regime, presence/absence of scrub, invasive species cover), all of which were assessed on site.

3. Survey Timings (18/12/2025)

Professional guidance, including CIEEM guidance on ecological survey and reporting, recognises that while the optimal growing season is necessary where detailed floristic assessment is required (for example to confirm species-rich grassland or identify key indicator species), surveys undertaken outside this period can still provide reliable and proportionate information depending on the habitats present and the purpose of the survey.

In this instance, the purpose of the survey was to:

- Classify habitats in accordance with the UK Habitat Classification (UKHab);
- Assign distinctiveness categories under the Statutory Biodiversity Metric;
- Assess habitat condition using the relevant metric criteria.

The habitats present comprised a modified grassland of low botanical complexity. They did not include semi-improved or species-rich grassland requiring peak-season botanical confirmation. The grassland recorded is demonstrably species-poor, containing fewer than nine vascular plant species per square metre, which meets the Statutory Biodiversity Metric threshold for poor condition. Given this low species richness, it would not reasonably achieve a higher condition category during the optimal survey season.

Distinctiveness within the Statutory Biodiversity Metric is determined by habitat type rather than seasonal species counts. The modified grassland present is structurally evident and readily classifiable throughout the year. As such, the December survey date does not



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materially undermine the assigned distinctiveness category, the condition assessment, or the resultant Biodiversity Net Gain calculation.

The survey was sufficient to:

- Identify and map habitat types;
- Assign appropriate UKHab classifications;
- Assess structural condition characteristics;
- Confirm the absence of higher distinctiveness habitats.

While peak-season surveys are necessary where higher distinctiveness or enhanced condition is being claimed, that is not the case here. The habitats recorded are consistent with modified, species-poor communities that are identifiable year-round.

Accordingly, the timing of the survey does not invalidate the UKHab classification, the condition assessment, or the submitted Biodiversity Net Gain calculations.

Should the Local Planning Authority consider it necessary, a verification visit during the growing season could be secured by condition. However, given the low diversity and modified character of the habitats present, it is highly unlikely that such a visit would materially alter the metric outcome

4. Confidence in the BNG Calculations

The Biodiversity Net Gain calculations were undertaken using the Statutory Biodiversity Metric and are directly derived from:

- Habitat type (which determines distinctiveness),
- Measured habitat area,
- Assessed condition,
- Strategic significance (where applicable).

Given that:

- Habitat types were clearly identifiable,
- Distinctiveness is fixed by habitat type within the metric,
- Grassland species richness is below the nine-species-per-m² threshold for higher condition,



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- Condition assessments were undertaken in line with statutory guidance,

There is sufficient and proportionate evidence to support the submitted BNG calculations.

Conclusion

The information provided is proportionate, policy-compliant, and sufficient to allow the LPA confidence in the UKHab classification and associated Biodiversity Net Gain metric outputs.

We respectfully request that the LPA reconsider its position in light of the clarification above.

Yours faithfully,

Andrew May

Managing Director