Land Off Shaw Lane, Carlton, Barnsley

Biodiversity Net Gain Statement & Draft Plan

Vistry Group

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Summary

Envance was commissioned by Vistry Group to undertake a Biodiversity Net Gain Assessment (BNG) of the proposed development at a parcel of land off Shaw Lane, Carlton, Barnsley (hereafter referred to as the 'Site'), and produce a plan to achieve net gain against a target of 10% BNG.

The baseline date is considered to be the 12th of January 2026, the date of the UKHab survey. There was no identified irreplaceable habitat on site.

The proposed development, as understood from habitats retained, enhanced and created as shown on the Landscape Plan **GLY0211 GA 01C**, calculated the Site to be approximately 7.6 ha. Area habitats on site include:

- Other neutral grassland
- Cereal crops
- Ponds (non-priority habitat)
- Rural tree

Linear habitats on-Site include:

- Native hedgerow
- Native hedgerow with trees
- Ditch

Biodiversity Net Gain

The baseline biodiversity of the Site is calculated to be:

- 16.37 Habitat Units (HU)
- 2.95 Hedgerow Units (HeU)
- 0.57 Watercourse Units (WU)

The on-Site post development biodiversity of the Site is calculated to be:

- 12.51 HU
- 3.01 HeU
- 0.57 WU

This results in a net loss of -3.86 HU (-23.58%) for area-based habitats, and a net gain of 0.06 HeU (+2.01%) for hedgerow units. There is no net change in watercourse units. Overall, there is a shortfall of 4.40 HU, 0.24 HeU and 0.06 WU which is needed to achieve 10% biodiversity net gain. The hedgerow unit shortfall can be addressed on-site through enhancement of the retained hedgerows from moderate to good condition, which is calculated to increase the hedgerow unit value to 3.84 HeU (+29.93%), therefore satisfying the mandatory 10% net gain target for hedgerow units on-site.

Presuming the retention of the existing site design, the remaining area-based and linear habitat units could be obtained from either:

a) a third-party provider identified and engaged to deliver the units on behalf of the project such as a habitat bank.

b) statutory credits purchased from the government if no off-site providers can be sourced.

1. Introduction

1.1 Background

1.1.1 This report is a Biodiversity Net Gain Assessment (BNG) of the proposed development at a parcel of land off Shaw Lane, Carlton, Barnsley (the 'Site'; central National Grid Reference SE 37390 10331), and produce a plan on how to achieve net gain against a target of 10% BNG.

1.1.2 Condition 33 states:

"Notwithstanding the submitted details, before above ground works commence a scheme for biodiversity enhancement to include the provision of works and/or measures on the site which will secure the delivery of a net gain in biodiversity of at least 10% (supported by a BNG metric) shall be submitted to and agreed in writing with the Local Planning Authority. The approved details thereafter shall be implemented in accordance with the submitted timetable, retained and maintained for their designed purpose in accordance with the approved scheme. The scheme shall include, but not limited to, the following details:

- *Description, design and specification of the type of works or measures to be undertaken;*
- *Details of materials and construction method to ensure long lifespan of the works or and/or measures to be undertaken; and*
- *Drawing(s) showing the location and where appropriate the elevation of the works and/or measures to be installed or undertaken."*

1.1.3 As part of working towards discharge of Condition 33, it is necessary to understand whether the latest site design can deliver at least 10% BNG and provide guidance on how that can be delivered on site or if necessary off-site, which is the aim of this report. The details requested in the bullet points of Condition 33 as related to BNG are addressed on site by the landscape design.

1.2 Site Context

1.2.1 The Site is located in Carlton, north-west Barnsley, and is surrounded by industrial agricultural land and urban development. A railway corridor is immediately adjacent to the east, Shaw Lane is immediately adjacent to the south, and the Barnsley Canal is located to the west.

1.3 The Proposed Development

1.3.1 It is understood the proposed project will involve the construction of 214 residential dwellings and associated gardens, access and parking areas. The remainder of the site will include public open/green space with associated grassland habitat, hedges and trees.

1.4 Purpose of the Report

1.4.1 This Biodiversity Assessment is broadly based on the Chartered Institute of Ecology and Environmental Management (CIEEM) guidance (CIEEM, 2021) as follows:

- Present the baseline survey undertaken on the Site and to present the results of habitat condition assessment surveys following the Statutory biodiversity metric: User Guide.
- Provide an overview of the proposed habitats following completion of the Proposed Development based on information supplied by the Applicant.
- Present the results of the Defra Statutory Biodiversity Metric (SBM) assessment completed for the Proposed Development.

- Assess the likelihood of the Proposed Development achieving a net gain in biodiversity through the SBM.

1.4.2 This report should be read in conjunction with the completed Statutory Biodiversity Metric calculation tool (Excel spreadsheet '1025_SBM_V2') and Preliminary Ecological Appraisal (Envance, 2026[1]).

[1] Envance (2026) Mickleover Primary School. Preliminary Ecological Assessment

2. Methodology

2.1 Biodiversity Net Gain Metric

2.1.1 The Biodiversity Net Gain calculations were undertaken using the DEFRA Statutory Biodiversity Metric version 1.0.4. Full details of the calculation methodology are provided in the Statutory Biodiversity Metric – User Guide. All habitats were input using their UKHab V2.1 habitat designations (or nearest equivalent in Statutory Biodiversity Metric).

2.2 Habitat Condition Scoring

2.2.1 Where habitat condition was not fixed, the condition assessment of each habitat is based on criteria and scoring. The criteria and scores are provided in the Statutory Biodiversity Metric Technical Annex 1: Condition Assessment Sheets and Methodology January 2026.

2.3 Baseline Habitats Source and Date

2.3.1 Based on historic aerial imagery, there was not considered to be evidence of significant degradation in vegetated habitats and on-site biodiversity since January 2020.

2.3.2 The baseline habitat for the site is therefore based on results from the updated UKHab habitat survey undertaken by Envance ecologist Dermot McKee on 12th January 2026, as detailed in the Preliminary Ecological Appraisal (PEA) (Envance, 2026).

2.4 UKHab Habitat Survey

2.4.1 The survey recorded Site habitats present according to the UK Habitat Classification system (UKHab, 2023) and assessed their condition using the Statutory Metric Condition Sheets[2]. The abundance of the dominant and key indicator plant species was assessed using the DAFOR scale (D = Dominant, A= Abundant, F = Frequent, O = Occasional, R = Rare). The Minimum Mappable Unit applied was 25m^2.

2.4.2 Key indicator species were considered to be those specifically listed in the UKHab Classification 2 (UKHab Ltd., 2023) as required to identify the habitat type, ancient woodland species such as those listed within Schedule 2 of the Hedgerow Regulations 1997 as "Woodland Species", and indicator species for the Priority Habitat species rich grassland types as produced by DEFRA (DEFRA, 2025).

2.4.3 Habitats were identified to UKHab level 4 as far as possible, except for modified grassland to level 3 (g4 Modified grassland), native hedgerows taken where possible to level 5 (h2a 5 "Species-rich native hedgerow" and h2a6 "Other native hedgerow", and developed land; sealed surface taken to level 5 (u1b5 "Buildings" and u1b6 "Other developed land").

2.4.4 Any observed plant stands of Invasive Non-Native Species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were also recorded.

2.4.5 Watercourse habitats wet ditches (ditches estimated from standing water or aquatic vegetation to hold water for more than 4 months of the year), streams, canals and rivers were mapped up to 10 m from the Site as safe access allowed.

2.4.6 The onsite habitats were then converted to the equal or nearest equivalent designations within the BNG Metric classification, for the purpose of the Statutory Biodiversity Metric and this BNG report. Habitat measurements were made using digital mapping software (QGIS Geographic Information System version 3.44.12).

[2] https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides (statutory Metric Condition Sheets)

2.5 Proposed Habitats Source

2.5.1 Proposed habitats for the metric were based on interpreting the proposed landscape plan shown in the Landscape General Arrangement drawing ref. **GLY0211 GA 01C**, drawn by GOLBY AND LUCK LTD, dated March 2026 (hereafter referred to as the "Landscape Plan") into UKHab V2 classification (or nearest equivalent in Statutory Biodiversity Metric) and measuring the proposed habitat areas using digital mapping software the proposed habitats (QGIS Geographic Information System version 3.44.12).

2.6 Strategic Significance

2.6.1 The following are considered "Formally identified in local strategy":

- Areas identified as "mapped measures", within a local nature recovery strategy (LNRS);
- Other local strategies and plans where known to be clearly indicated by the Local Planning Authority as to be used to inform the value applied to the strategic significance multiplier.

2.6.2 The following are considered "Location ecologically desirable but not in local strategy":

- Areas of relevant habitat adjacent to areas identified within a LNRS;
- Areas of low distinctiveness habitats in locations where any vegetated habitat is rare (e.g. highly urban habitats)
- Areas of medium or higher distinctiveness habitats adjacent to and forming part of a patch of same/similar habitats.

2.6.3 The Local Planning Authority has published a Nature Recovery Strategy and this was therefore used to identify any habitats formally identified in local strategy.

2.6.4 The LNRS for South Yorkshire, prepared by the South Yorkshire Mayoral Combined Authority (SYMCA), states that the LNRS must be the only document used to identify places and habitats of High Strategic Significance. To receive the Strategic Significance uplift, the BNG habitat creation or enhancement must be consistent with the Potential Measures identified for that location. In accordance with the Statutory Biodiversity Metric User Guide, once an LNRS has been published the Strategic Significance of baseline habitats is always scored as Low, irrespective of habitat type or condition.

2.6.5 The LNRS includes a mapped potential measure applicable to the Site: 'WO-01-04: Woodland – new (create)', which looks to create new woodlands to buffer and connect existing woodlands, enable habitat connectivity between fragmented woodlands, and increase overall tree and woodland cover through natural colonisation and regeneration.

2.6.6 The proposed development does not include new woodland creation, buffering, or connection of existing woodland. It was therefore considered that none of the proposed post-development habitats aligned with the mapped potential measure (WO-01-04) identified within the LNRS for this location, and so no Strategic Significance uplift has been applied to the post-development habitats.

2.7 Mitigation Hierarchy

2.7.1 Habitat enhancement and creation for Biodiversity Net Gain should follow the required principles and mitigation hierarchy as set out in the Government guidance (DEFRA, 2024) (see Appendix 1 for a summary).

2.8 Application of the 10 Good Practice Principles

2.8.1 The following describes how the 10 Biodiversity Net Gain good practice principles for development

(CIEEM, 2016) have been taken into consideration in the BNG process.

- **Biodiversity Gain Hierarchy**: In accordance with Government guidance (DEFRA, 2023) (see Appendix 1 for a summary), as far as possible, medium and higher distinctiveness habitats have been retained on site. Where this has not been possible, it has first been sought to enhance existing habitats on site, and then to create new habitats on site to compensate for the loss. Where this cannot realistically be achieved on site given the aims of the proposed development, off-site habitat enhancement and creation solutions have been looked into based on adjacent or nearby land, and where not available, purchase of appropriate units from a local habitat bank. Purchase of statutory biodiversity credits is only considered as a last resort.
- **Irreplaceable Biodiversity**: Any irreplaceable habitat has taken into account in the design as soon as identified with the aim of avoiding impact unless absolutely not reasonably avoidable; it is understood any losses to irreplaceable habitat cannot be offset.
- **Inclusive and Equitable**: Where stakeholders other than the site owner or developer have been identified, they have been consulted and their needs taken into account.
- **Risk Mitigation**: It is recognised that enhancing and creating habitats takes time and skill and that there is a degree of uncertainty in achieving the intended habitat and condition. To mitigate for the uncertainty in achieving the intended habitat and in the time intended, habitats that are simpler to create and more certain to be achieved have been favoured wherever possible over habitats that are more difficult to achieve, e.g. other neutral grassland is considered more readily achievable in most cases compared with lowland meadow. Similarly, achieving moderate condition is considered readily achievable for many habitats without complex management, therefore moderate condition at most has been typically targeted, whereas achieving good condition, apart from for some simpler habitats, can require more complex management and has only been targeted where the type and current condition of habitat render it reasonably achievable.
- **Achieving a Measurable Net Gain**: In addition to measuring the net gain through use of the Statutory Metric, the ecologist has considered the suitability of proposed habitats in their local context in terms of how they will help achieve nature conservation priorities such as by providing habitat for Priority Species. The contribution of the proposed habitats to ecosystem services in terms of provisioning (e.g. use of traditional fruit trees where appropriate), regulating (e.g. trees for shade, contribution to sustainable drainage), cultural (e.g. aesthetic and health benefits of communal areas) and supporting services (e.g. photosynthesis, carbon capture) has also been taken into consideration by the ecologist.
- **Achieving Best Outcomes for Biodiversity**: In addition to the outcomes ensured by the trading rules of the Statutory Metric, the ecologist has taken into account the local context of the site to ensure proposed habitats increase connectivity and support local nature conservation priorities as far as reasonably possible.
- **Being Additional**: The aim has been to not just meet but wherever reasonably possible exceed the minimum BNG target.
- **Achieving a Net Gain Legacy**: The long-term viability of the habitats has been taken into account with the aim that they could be realistically maintained for 30 years or more. It is expected that monitoring and adaptive management of significant on-site BNG will be secured via a conditioned Habitat Management and Monitoring Plan.
- **Optimising Sustainability**: The wider environmental benefits for a sustainable society and economy from BNG have been taken into account especially in terms of the ecosystem services as mentioned previously.

- **Being Transparent**: Reporting throughout the BNG process has aimed to be clear and transparent, and sticking to the point. Additional details on methods and findings can be obtained on request.

2.9 Quality Assurance

2.9.1 The habitat calculations and technical note have been overseen, checked, and verified by a full member of CIEEM, who is bound by its code of professional conduct.

2.9.2 All surveys and assessments have been undertaken with reference to the recommendations given in British Standard BS 8683:2021 (2021) Process for Designing and Implementing Biodiversity Net Gain and as stated within specialist guidance, as appropriate and referenced separately.

2.9.3 Any alterations to the areas inputted into the metric must be measured using the same software as was used initially, so as to avoid measurement discrepancies.

2.10 General Limitations

2.10.1 This report serves to indicate the value of the Site in nature conservation terms based upon the survey or desk study data gathered. As with any survey of this kind, the information collected defines the habitat types present and their condition at a particular point in time, and is not intended to be a record of every species present.

2.10.2 Numbers within the SBM, especially HU numbers, are subject to two decimal place rounding. Therefore, there may be small apparent margins of error, when in fact these are correct within the SBM and are due to rounding.

2.10.3 Habitat figures have been produced using contemporaneous field notes, supported by aerial imagery (Google Earth 2026) and Site mapping supplied by the client. As the reliability of these datasets directly influences the spatial accuracy of the resulting habitat maps, the figures should be regarded as an informed representation suitable for Biodiversity Net Gain assessment, rather than a definitive record of on-Site habitat boundaries for legal or engineering purposes. In most cases slight inaccuracies arising from the sources are likely to be rendered insignificant by the level of precision of the UKHab method, which is limited by the Minimum Mappable Unit and the use of lines for mapping certain features such as hedgerows that in reality have width.

2.11 Policy and Legislation

2.11.1 The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021 and was amended by the Levelling Up and Regeneration Act 2023. The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 made consequential amendments to other parts of the 1990 Act.

2.11.2 The biodiversity net gain regulations most directly relevant to planning are:

- The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 which commence biodiversity net gain for most types of new planning applications and provides transitional arrangements for section 73 permissions.
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024 which prescribe exemptions for categories of development to which biodiversity net gain does not apply.
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 which amend the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013 to include provisions in respect of applications for planning permission and the submission and determination of Biodiversity Gain Plans, as well as modifications of Schedule 7A of the Town and Country Planning Act 1990 for phased development.
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 which sets out the modifications for irreplaceable habitat.

2.11.3 Article 37A of The Town and Country Planning (Development Management Procedure) (England) Order 2015 describes the Biodiversity Gain Hierarchy, which is a structured approach designed to maximise biodiversity gains. Broadly, this identifies the following steps to be considered in order when a habitat may be impacted by a development;

- Retention - the avoidance of adverse impacts,
- Enhancement - onsite habitat enhancement,
- Creation - onsite habitat creation,
- Offsite mitigation - gains from an offsite location,
- Biodiversity credits - the purchase of biodiversity credits as a last resort.

2.11.4 **Appendix 1** provides further details of policy and legislation.

3. Baseline Biodiversity Assessment

3.1 Irreplaceable Habitat

3.1.1 No irreplaceable habitat has been identified on site.

3.2 On-Site Baseline Biodiversity

3.2.1 The Site at baseline contains the habitats an associated biodiversity values shown in **Tables 1-3** and **Figure 1.** Habitat descriptions and photographs are provided within the PEA report (Envance, 2026).

Table 1 - Baseline Area-based Habitats[3], Condition and Unit Scores

Habitat Identified	Habitat Distinctiveness	Condition	Strategic Significance	Approx Area (ha)	Biodiversity Value (HU)
Cereal crops	Low	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	7.13	14.27
Other neutral grassland	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.375	1.50
Other neutral grassland	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.048	0.19
Ponds (non-priority habitat)	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.012	0.05
Rural tree	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.0448	0.36
				Total	**16.37**

*** Numbers within the SBM are subject to two decimal place rounding.**

Table 2 - Baseline Hedgerow-based Habitats, Condition and Unit Scores

Habitat Identified	Habitat Distinctiveness	Condition	Strategic Significance	Approx Length (km)	Biodiversity Value (HeU)
Native hedgerow	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.0207	0.08
Native hedgerow	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.164	0.65

[3] Habitat types are presented in their Statutory Biodiversity Metric format.

Native hedgerow	Low	Moderate	Area/compensation not in local strategy/ no local strategy	0.085	0.34
Native hedgerow with trees	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.234	1.87
				Total	**2.95**

*** Numbers within the SBM are subject to two decimal place rounding.**

Table 3 - Baseline Watercourse-based Habitats, Condition and Unit Scores

Habitat Identified	Habitat Distinctiveness	Condition	Strategic Significance	Approx Length (km)	Biodiversity Value (HeU)
Ditches	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.142	0.57
				Total	**0.57**

*** Numbers within the SBM are subject to two decimal place rounding.**

4. Post-Development Biodiversity Assessment

4.1 Habitats Layout

4.1.1 The post-development habitats layout is shown in **Figure 2**, and are based on the Landscape Plan.

4.2 Habitat Condition Assumptions

4.2.1 Where the proposed condition is set as "poor", it is considered that the constraints of the proposed design and use of the site as currently understood will prevent the habitat from achieving a better condition.

4.2.2 Where the proposed condition is set as "moderate", it is considered that at least that level of condition can be achieved for that habitat given the context of the proposed design and use of the site as currently understood, with a low level of management which would need to be detailed in a Habitat Management and Monitoring Plan.

4.2.3 Where the proposed condition is set as "good", it is considered that such a level of condition is realistically achievable for that habitat given the context of the proposed design and use of the site as currently understood, albeit with potentially a significant level of management which would need to be detailed in a Habitat Management and Monitoring Plan.

4.3 Proposed Tree Size Assumptions

4.3.1 It is expected that all trees to be planted would have, at planting time, a diameter at breast height of greater than 7.5cm and equal or lesser than 30cm, and therefore have been entered as "small" category trees in the metric unless otherwise stated.

4.4 Habitats Assumed Retained

4.4.1 It is considered that with suitable protection during ground works and construction, as shown on the Landscape Plan, areas of the following habitat parcels and types can be retained in the same condition, as shown in the metric:

- Rural trees T1-T5
- Native hedgerows HR2 – HR4
- Part of native hedgerow HR1 and native hedgerow with trees HR5
- Wet ditch WC1

4.5 Habitats Assumed Created

4.5.1 It is considered that with appropriate planting as shown on the Landscape Plan, areas of the following habitat parcels and types can be created as shown in the metric:

- Habitat area parcels developed land; sealed surface;
- Habitat area parcels introduced shrub;
- Habitat area parcel mixed scrub;
- Habitat area parcels modified grassland;
- Habitat area parcels other neutral grassland;
- Habitat area parcels vegetated garden;

- Habitat area parcels bioswale;
- Newly planted trees.

4.6 On-Site Post Development Biodiversity Value

4.6.1 The Site post development is expected to contain the habitats shown in **Tables 4-6** and **Figure 2.**

4.6.2 The predicted on-site post-development biodiversity of the Site is shown in the Biodiversity Value totals of **Tables 4-6**.

Table 4 - Post-development Area-based Habitats, Condition and Unit Scores

Habitat	Intervention Type	Indicative Target Condition	Strategic Significance	Approx. Area (ha)	Estimated Biodiversity Value (HU)
Developed land; sealed surface	Creation	N/A - Other	Area/compensation not in local strategy/ no local strategy	4.20	0.00
Introduced shrub	Creation	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	0.036	0.07
Mixed scrub	Creation	Moderate	Area/compensation not in local strategy/ no local strategy	0.038	0.26
Modified grassland	Creation	Moderate	Area/compensation not in local strategy/ no local strategy	0.497	1.72
Other neutral grassland	Creation	Moderate	Area/compensation not in local strategy/ no local strategy	0.579	3.87
Vegetated garden	Creation	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	1.95	3.77
Bioswale	Creation	Moderate	Area/compensation not in local strategy/ no local strategy	0.2675	0.69
Rural tree	Creation	Moderate	Area/compensation not in local strategy/ no local strategy	0.5782	1.77
Rural tree	Retention	Moderate	Area/compensation not in local strategy/ no local strategy	0.0448	0.36
				Total	**12.51**

*** Numbers within the SBM are subject to two decimal place rounding.**

Table 5 - Post-development Hedgerow-based Habitats, Condition and Unit Scores

Habitat	Intervention Type	Indicative Target Condition	Strategic Significance	Approx. length (km)	Estimated Biodiversity Value (HeU)
Species-rich native hedgerow	Creation	Moderate	Area/compensation not in local strategy/ no local strategy	0.143	0.96
Non-native and ornamental hedgerow	Creation	Poor	Area/compensation not in local strategy/ no local strategy	0.237	0.23
Native hedgerow	Retention	Moderate	Area/compensation not in local strategy/ no local strategy	0.0106	0.04
Native hedgerow	Retention	Moderate	Area/compensation not in local strategy/ no local strategy	0.164	0.65
Native hedgerow	Retention	Moderate	Area/compensation not in local strategy/ no local strategy	0.085	0.34
Native hedgerow with trees	Retention	Moderate	Area/compensation not in local strategy/ no local strategy	0.098	0.79
				Total	**3.01**

*** Numbers within the SBM are subject to two decimal place rounding.**

Table 6 - Post-development Watercourse-based Habitats, Condition and Unit Scores

Habitat	Intervention Type	Indicative Target Condition	Strategic Significance	Approx. length (km)	Estimated Biodiversity Value (HeU)
Ditches	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.142	0.57
				Total	**0.57**

*** Numbers within the SBM are subject to two decimal place rounding.**

5. Biodiversity Net Gain Draft Plan

5.1 On-Site Biodiversity Net Gain

5.1.1 The proposed development, as understood from habitats retained, enhanced and created as currently shown on the Landscape Plan, is calculated to result in on-site Biodiversity Net Gains of:

- -23.58 % for habitat area units;
- +2.01% for hedgerow units;
- 0.00% for watercourse units.

5.1.2 The trading rules, where habitats must be replaced with a similar, same or better habitat, have not been satisfied due to an overall loss in habitat units.

5.1.3 It is recommended that opportunities to enhance the areas of retained hedgerows HR1-HR5 from moderate to good condition are explored. As the retained hedgerows currently contribute 2.95 HeU at moderate condition, achieving good condition across this network is anticipated to increase the onsite hedgerow biodiversity net gain to approximately 0.88 HeU (+29.93%), which would satisfy the mandatory 10% net gain target whilst also satisfying trading rules.

5.1.4 It is considered achievable for the on-site hedgerows to be enhanced to achieve 'good' condition. This can be achieved across all enhanced hedgerows through targeted management and planting to increase the average hedgerow width to greater than 1.5 m and planting to reduce canopy gaps. Canopy gaps should account for less than 10% of the total hedgerow length, with no individual gap exceeding 5 m in length.

5.2 Off-site Biodiversity Requirement

5.2.1 As the BNG target cannot realistically be achieved on site with current layout for area-based habitats and watercourses, **Table 7-9** below details the off-site biodiversity requirement to mitigate habitat loss and satisfy trading rules associated with the proposed development, as well as any additional value required to achieve the BNG target. The hedgerow unit target can be achieved on-site through enhancement of the retained hedgerows to good condition.

Table 7– Area-based Habitat Unit Off-site Biodiversity Requirement

Unit type	Habitat lost	Trading Rule	Unit deficit
Area	Overall loss of Medium distinctiveness habitat - Lakes – Ponds (non-priority habitat)	Medium distinctiveness habitat of the same broad habitat group (Lakes) or higher required	0.05
Area	Overall loss of Low distinctiveness habitat - Cropland – Cereal crops	Low distinctiveness habitat or higher required	3.86
Area	Additional value required to achieve mandatory 10% net gain target	Not a trading rule requirement - any habitat satisfying the trading rules above may	1.59

Unit type	Habitat lost	Trading Rule	Unit deficit
		contribute	
Total area-based units required			5.50

Unit type	Habitat lost	Trading Rule	Unit deficit
Watercourse	Additional value required to achieve mandatory 10% net gain target	Not a trading rule requirement - retained watercourse alone cannot deliver the required uplift	0.06
Total watercourse units required			0.06

5.3 Net Gain Delivery

5.3.1 It is expected that the delivery of the features for BNG on site will be described in detail in the Habitat Management and Monitoring Plan required for condition 34.

5.3.2 Any on-site habitat creation, management and monitoring for BNG will be the responsibility of the developer. Monitoring reports will need to the submitted to the Local Planning Authority.

6. Conclusion

6.1.1 The on-site baseline biodiversity value is 16.37 habitat units, 2.95 hedgerow units and 0.57 watercourse units.

6.1.2 The proposed development, as understood from the habitats retained and created as shown on Landscape Plan, is calculated to result in an on-site biodiversity change of -23.58% for habitat area units and +2.01% for hedgerow units. There is no net change in watercourse units. The on-site area unit deficit arises primarily from the loss of low distinctiveness habitats, primarily cropland. The marginal on-site hedgerow gain is driven by the creation of higher-distinctiveness species-rich native hedgerow, partially offset by the loss of native hedgerow with trees. However, it is possible this gain could be increased to 0.88 HeU (+29.93%) on-site through enhancement of retained hedgerows from moderate to good condition, therefore satisfying the mandatory 10% net gain target for hedgerows.

6.1.3 As the 10% BNG target cannot be achieved on-site for habitat area-based and linear-based watercourse units, an off-site habitat unit contribution will be required.

6.1.4 Trading rules are not currently satisfied on-site for area-based and watercourse units, and will be addressed through the off-site provision, as set out in Tables 7 to 9.

7. References

CIEEM (2016). *Biodiversity Net Gain Good Practice Principles for Development*. CIRIA, CIEEM, IEAMA.

CIEEM (2021). *Biodiversity Net Gain Report and Audit Templates*. Chartered Institute of Ecology and Environmental Management, Winchester, UK

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Google. (2026). *Google Earth Pro (Version 7.3.6) [Software*]. Google. https://earth.google.com. [accessed 27.08.2026]

DEFRA (2024) *Statutory Biodiversity Metric.* Available at https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides [accessed 27/08/2026]

UKHab Ltd (2026). *UK Habitat Classification Version 2.1*. Available at https://www.ukhab.org

8. Figures

Figure 1 - On-site baseline habitats.

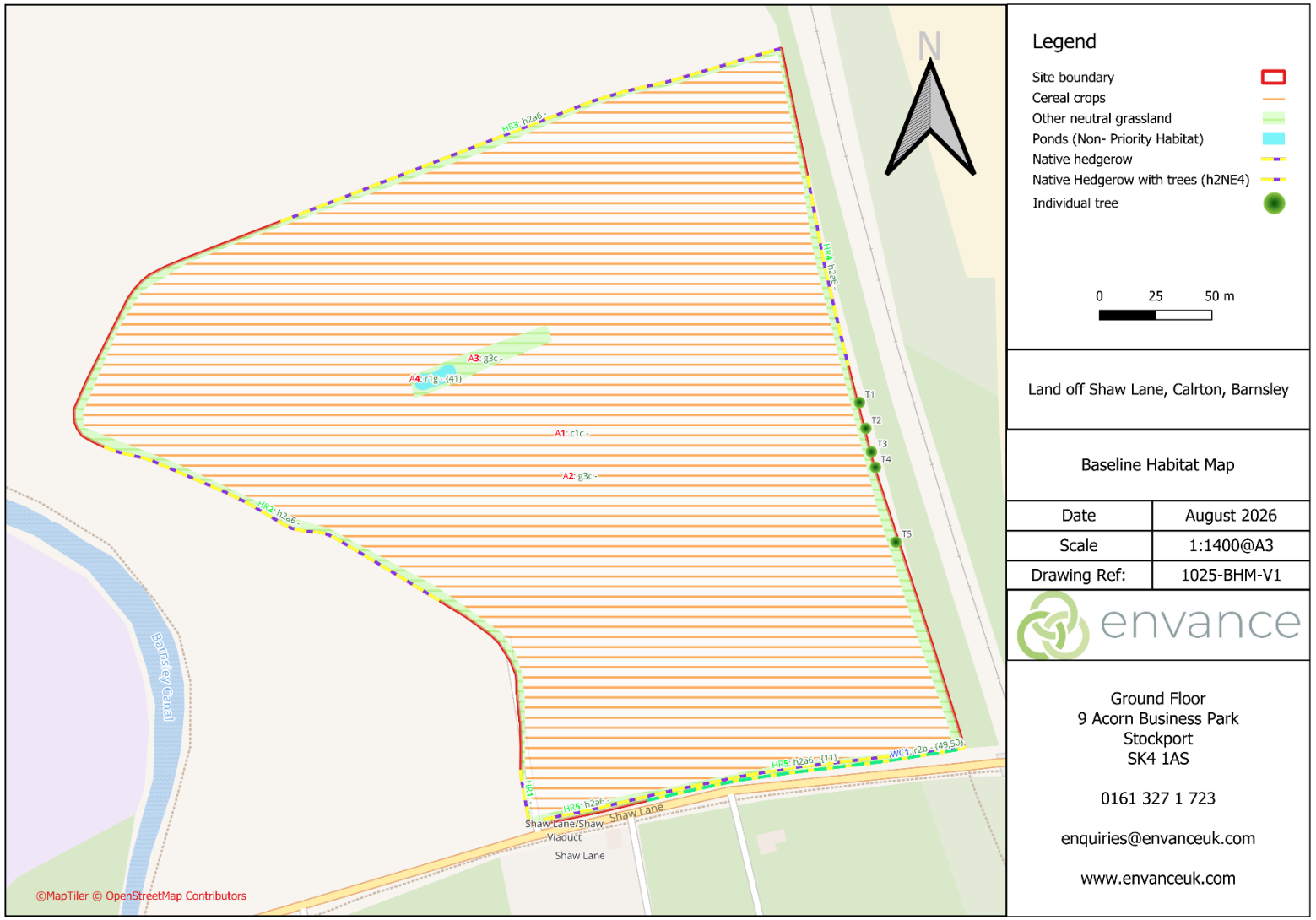
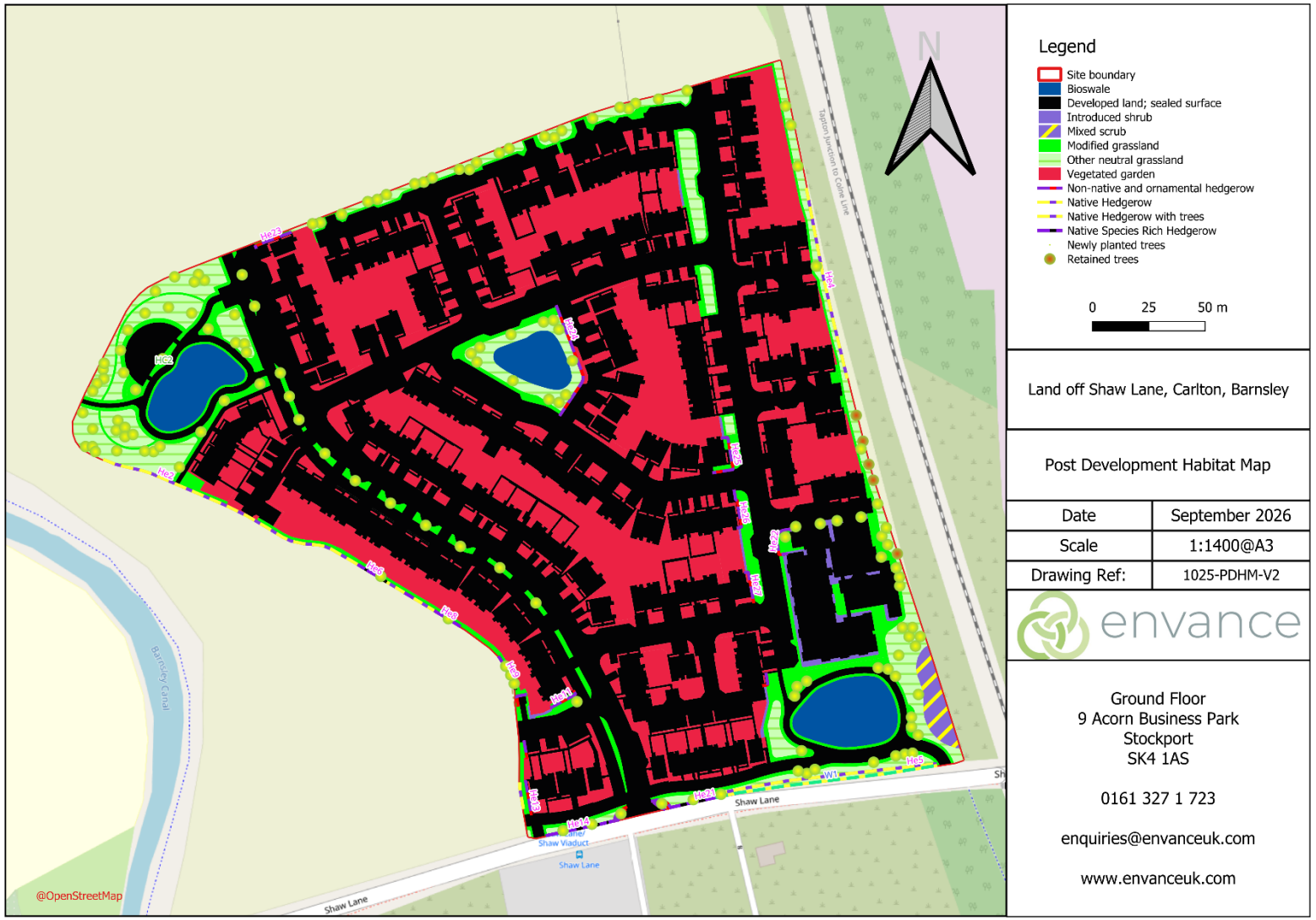


Figure 2 - On-site Post-Development habitat On-site Post-Development habitat



Appendix 1 Summary of Legislation

Town and Country Planning Act 1990 – Biodiversity Net Gain

Under Schedule 7A of the Town and Country Planning Act 1990 (inserted by Schedule 14 of the Environment Act 2021), grants of planning permission are to be subject to a condition to secure that the biodiversity net gain objective is met. Specifically;

- The biodiversity gain objective is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.
- The biodiversity value attributable to the development is the total of—
    - the post-development biodiversity value of the onsite habitat,
    - the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and
    - the biodiversity value of any biodiversity credits purchased for the development.
- The relevant percentage is 10%.
- The Secretary of State may by regulations amend this paragraph so as to change the relevant percentage.

The Schedule goes on to emphasise the use of the most recent version of the Statutory Biodiversity Metric, detail from when the baseline biodiversity of a relevant site should be calculated, how post-development biodiversity values should be calculated, and how off-site biodiversity gains should be registered and calculated.

Exemptions

Certain types of developments are exempt from the mandatory biodiversity net gain condition –

- Existing planning applications - If a planning application for a development was made before day one of mandatory BNG on 12 February 2024, the development is exempt from BNG. This also applies to retrospective planning permissions made under section 73A and section 73 permissions where the original permission which the section 73 relates to was either granted before 12 February 2024 or the application for the original permission was made before 12 February 2024,
- Householder development - Development which is subject of a householder application as defined within Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015,
- Development subject to the de minis exemption - Development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m by 5m) of on-site habitat, or 5 metres of linear habitats such as hedgerows,
- Self-build and custom build development - Developments which:
    - consists of no more than 9 dwellings, and
    - is carried out on a site which has an area no larger than 0.5 hectares, and
    - consists exclusively of dwellings which are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015.
- Urgent Crown development granted permission under section 293A of the Town and Country Planning Act 1990,

- Developments that are granted planning permission by a development order (including permitted development rights),
- Development of a biodiversity gain site - Development which is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the biodiversity gain condition which applies in relation to another development,
- Development related to the high speed railway transport network - Development forming part of, or ancillary to, the high speed railway transport network comprising connections between all or any of the places or parts of the transport network specified in section 1(2) of the High Speed Rail (Preparation) Act 2013

The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024

This legislation includes a schedule in the form of two tables which list 'irreplaceable habitats'. These habitats are considered too rare or difficult to reproduce to be subject to standard biodiversity net gain principles, and must therefore be mitigated for with bespoke compensation if impacted at all. The list of habitats is as follows;

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

The Town and Country Planning (Development Management Procedure) (England) Order 2015

Section 73A describes the biodiversity gain hierarchy, which is copied below in its entirety.

In this Part, "biodiversity gain hierarchy" means the following actions in the following order of priority—

a) in relation to onsite habitat with a habitat distinctiveness score, applied in the biodiversity metric, equal to or higher than four—

i. *avoiding adverse effects of the development, or*

ii. *insofar as those adverse effects cannot be avoided, mitigating those effects;*

b) in relation to any onsite habitat which is adversely affected by the development, compensating for that adverse effect by—

i. *habitat enhancement of onsite habitat;*

ii. *insofar as there cannot be that enhancement, creation of onsite habitat;*

iii. *insofar as there cannot be that creation, the availability of registered offsite biodiversity gain for allocation to the development;*

iv. *insofar as registered offsite biodiversity gain cannot be allocated to the development, the purchase of biodiversity credits*

National Policy

National Planning Policy Framework

The National Planning Policy Framework (NPPF, 2024) sets out the Government's planning policies for England

and how these are expected to be applied. Section 15 of the NPPF deals with conserving and enhancing the natural environment. Habitats and biodiversity are specifically referenced in paragraphs 187 to 195, as copied below.

187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

c) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

d) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

e) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

f) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

g) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

h) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and

the extent to which that could be moderated.

191. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

192. To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

193. When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

194. The following should be given the same protection as habitats sites:

a) potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

195. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Appendix 2. Habitat Condition Assessments

See separate Excel spreadsheet – '**1025 PEA Habitat Condition Assessments 120126'**

Appendix 3. Statutory Biodiversity Metric Calculation Tool

See separate Excel spreadsheet – '**1025_SBM_V2'**