

Subject: RE: Cuffley Hill 19/0200

Hi Peter

There are a number of issues with this which I will go through below:

The grassland habitat described in row 2 of the baseline BNG biodiversity metric assessment has been incorrectly assigned to modified grassland. The UK habitats definition for this habitat is:

G4 Modified grassland

Definition: Vegetation dominated by a few fast growing grasses on fertile neutral soils. It is frequently characterised by an abundance of Rye-grass and White Clover.

Species: Palatable grasses mainly Rye grasses, Timothy, Cock's-foot, Crested Dog's-tail, Yorkshire Fog. Grass cover usually over 75%. Broadleaved species restricted mainly to White Clover, Creeping Buttercup, Greater Plantain, Dandelion, Broad-leaved Dock and Chickweed.

This is an agricultural mix (an improved grassland type) and not the grassland that has been described in the report. The report describes the grassland in row 2 as:

Much of the grassland is tending to tall ruderal and bramble scrub; dominated by A. elatius and species poor

A. elatius refers to Arrhenatherum elatius which is False Oat-grass.

The UK Habitats category that fits this habitat correctly is *Other neutral grassland g3c5 Arrhenatherum elatius grassland*. This is described as:

Definition: neutral grassland with False Oat-grass dominant.

Landscape and ecological context: Lightly managed or unmanaged fields or road verges in lowland areas

Species: This category is equivalent to NVC community MG1. Total grass cover is usually between 50 and 75% with abundant False Oat-grass. Cock's-foot is also constant.

When this grassland is changed to the correct habitat category it alters the spreadsheet significantly. I have attached the revised spreadsheet to show this.

Some of the claims of habitat enhancement have not been adequately justified. I consider it unrealistic to achieve good condition for *other neutral grassland* (row 2) in the habitat enhancement section. Moderate is a more realistic condition score. Similarly a score of good for *Other woodland broadleaved* (row 7) is unrealistic so close to a housing development. Moderate is again more reasonable. It is not possible to achieve a good score because of the likelihood of disturbance, trampling, compaction, introduction of garden waste etc. is too high to be sure of a good score in this location. When these scores are altered it affects the BNG score significantly.

The trading rules have also not been satisfied in the metric. This is not considered significant by the ecological consultant, but I disagree. The trading rules have to be satisfied for net gain to be achieved.

When these corrections are made a net loss of 23.48% is revealed. A biodiversity net gain is a net increase of 10% in habitat units. In accordance with the Defra research document:

Biodiversity net gain and local nature recovery strategies
RPC Reference No: RPC-4277(1)-DEFRA-EA

A 10% gain provides a small margin of gain to account for the outlined process, epistemic and linguistic uncertainties whilst operating within the parameters of established and successful net gain planning policies which are not thought to significantly affect development rates or viability. In simple terms, it is the most achievable level of net gain that the department could confidently expect to deliver genuine net gain, or at least no net loss, for biodiversity and thereby meet its policy objectives.

Therefore in order to achieve a measurable biodiversity net gain the development must achieve 16.5 habitat units. Currently it delivers 11.48 and is therefore 5.02 hu short of providing a net gain.

This does not preclude development on the site but it does mean that the applicant must provide, or agree to provide 5.02 habitat units offsite. These habitat units must be appropriate to offset the habitats lost (i.e. satisfy the trading rules). This can be done by sourcing a biodiversity offset from a broker, or providing a payment to the LPA via a S106 to provide this on the developers behalf.

HMWT can assist in this process, if required, both by providing the required condition and S106 wording and by helping the LPA to deliver the offset. The most practical way of delivering 5.02 hu is by assessing the landholding of BBC and locating the habitat units on an appropriate site. The offset payment must be sufficient for the LPA to deliver a 5.02 hu uplift to any site in perpetuity. HMWT can help with costing this so that the LPA can guarantee the delivery of this requirement of the Broxbourne Local Plan and NPPF.

Furthermore, all houses within the development must contain an integrated bat or swift box. This is required by NEB4 which states:

VI. Integrated features for wildlife e.g. Swift, House Martin and bat boxes should be incorporated into all suitable buildings.

This requirement of the local plan can be secured by condition, i.e.

'No development shall commence until details of 24 integrated bat boxes and 24 integrated swift boxes (model and location) marked on plans have been submitted and approved by the LPA. These devices shall be fully installed prior to occupation and retained as such thereafter.'

Reason: In accordance with BLP policy NEB4 VI and to conserve and enhance biodiversity in accordance with NPPF.

If you wish to discuss any of the above please get in touch

Best wishes

Matt

Headline Results[Return to](#)

On-site baseline	<i>Habitat units</i>	15.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	11.48
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-23.48%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-3.52
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-23.48%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Trading rules Satisfied?	No - Check Trading Summary	

Post development/ post intervention habitats

Habitat (Pre-Populated but can be overridden)	Change in distinctiveness and condition		Area (hectares)	Distinctiveness	Score	Condition	Score	Strategic significance			Standard time to target condition/years
	Distinctiveness change	Condition change						Strategic significance	Strategic significance	Strategic position multiplier	
Mixed scrub	Medium - Medium	Moderate - Good	0.17	Medium	4	Good	3	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	3
Other neutral grassland	Medium - Medium	Poor - Moderate	0.44	Medium	4	Moderate	2	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	10
Hawthorn scrub	Medium - Medium	Moderate - Good	0.028	Medium	4	Good	3	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	3
Other woodland; broadleaved	Medium - Medium	Moderate - Good	0.45	Medium	4	Good	3	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	10

1.09

Temporal risk multiplier					Difficulty risk multipliers				Habitat units delivered	Comments	
Habitat enhanced in advance/gears	Delay in starting habitat enhancement/gears	Standard or adjusted time to target condition	Final time to target condition/gears	Final time to target multiplier	Standard difficulty of enhancement	Applied difficulty multiplier	Final difficulty of enhancement	Difficulty multiplier applied		Assessor comments	Reviewer comments
		Standard time to target condition applied	3	0.899	Low	Standard difficulty applied	Low	1	1.97	Boundary habitats (E) maintained as diverse structures with periodic cutting	Accepted condition change for this habitat
		Standard time to target condition applied	10	0.700	Low	Standard difficulty applied	Low	1	2.99	Areas under oak trees including areas managed as SuDS will be managed to develop a wood pasture type grassland through retention between April and July followed by cut and collect. Long term management secured by a suitable management plan	Not realistic to achieve good condition next to a housing estate for this habitat. Moderate is more realistic
		Standard time to target condition applied	3	0.899	Low	Standard difficulty applied	Low	1	0.32	Boundary habitats (W) maintained as diverse structures with periodic cutting	Accepted condition change for this habitat
		Standard time to target condition applied	10	0.700	Low	Standard difficulty applied	Low	1	4.86	Woodland managed to main mature trees through suitable management including enabling some young tree growth and retention of dead wood	Not realistic to achieve good condition next to a housing estate for this habitat. Moderate is more realistic
									10.15		