

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	L	Return to

Trading rules Satisfied?

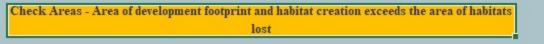
	Habitat units	15.00
On-site baseline	Hedgerow units	0.00
	River units	0.00
0 '4 4' 4'	Habitat units	11.48
On-site post-intervention	Hedgerow units	0.00
(Including habitat retention, creation & enhancement)	River units	0.00
0 '	Habitat units	-23.48%
On-site net % change	Hedgerow units	0.00%
(Including habitat retention, creation & enhancement)	River units	0.00%
	Habitat units	0.00
Off-site baseline	Hedgerow units	0.00
	River units	0.00
OSS 11 11 11	Habitat units	0.00
Off-site post-intervention	Hedgerow units	0.00
(Including habitat retention, creation & enhancement)	River units	0.00
Total not son't alson as	Habitat units	-3.52
Total net unit change	Hedgerow units	0.00
(including all on-site & off-site habitat retention, creation & enhancement)	River units	0.00
	Habitat units	-23.48%
Total on-site net % change plus off-site surplus	Hedgerow units	0.00%
(including all on-site & off-site habitat retention, creation & enhancement)	River units	0.00%

No - Check Trading Summary

1												
E	Condense / Show C											
Main Menu Instructions												
		н	abitats and areas		Distinctivene	ess	Conditi	ion	Strategic signi	ficance		
Ref	Broad habitat		Habitat type	Area (hectares)	Distinctivenes s	Scor e	Condition	Scor e	Strategic significance	Strategic significance	Strategic Significance multiplier	Suggested action to address habitat losses
1	Heathland and shrub		Mixed scrub	0.362	Medium	4	Moderate	2	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same broad habitat or a higher distinctiveness habitat required
2	Grassland		Other neutral grassland	1.9	Medium	4	Poor	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same broad habitat or a higher distinctiveness habitat required
3	Grassland		Modified grassland	0.228	Low	2	Fairly Poor	1.5	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required
4	Heathland and shrub		Hawthorn scrub	0.028	Medium	4	Moderate	2	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same broad habitat or a higher distinctiveness habitat required
5	Urban	Γ	Developed land; sealed surface	0.018	V.Low	0	N/A - Other	0	Area/compensation not in local strategy/ no local strategy	Significance	1	Compensation Not Required
6	Urban	Г	Developed land; sealed surface	0.105	V.Low	0	N/A - Other	0	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Compensation Not Required
7	Woodland and forest	**	Other woodland; broadleaved	0.45	Medium	4	Moderate	2	area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same broad habitat or a higher distinctiveness habitat required
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Ecological baseline	Retention category biodiversity value						Bespoke compensation	Comments					
Total habitat units	Area retaine d	Area enhance d	e units	units enhance	Area lost	Reviewer comments							
2.90		0.17	0.00	1.36	0.19	1.54		Bramble, blackthorn and hawthorn and areas of mixed scrub and incuding boundary habitats					
7.60		0.44	0.00	1.76	1.46	5.84		Much of the grassland is tending to tall ruderal and bramble scrub; dominated by A. elatius and species poor. 4 of 7 condition criteria satisfied.	This habitat is other neutral grassland g3c5 not modifiedd grassland				
0.68		80	0.00	0.00	0.23	0.68		Managed areas of grassland					
0.22		0.028	0.00	0.22	0.00	0.00		Bopundary hedge on west - unmanaged and losing base					
0.00			0.00	0.00	0.02	0.00							
0.00			0.00	0.00	0.11	0.00							
3.60		0.45	0.00	3.60	0.00	0.00		Mature oaks over acid grassland					

	A-2 Site Habit	tat Creation	}								
Condense / Show	Condense / Show Columns Condense / Show Rows										C
Main Me	Main Menu Instructions										
											Post develo
Broad Habitat	Broad Habitat Proposed habitat		Area (hectares)	(hootares Distinction		Condition	Score	Strategic signifi	icance Strategic significance	Strategic position multiplier	to target condition/year
Urban	Devel	eloped land; sealed surface	1.21	V.Low	0	N/A - Other	0	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	0
Urban		Introduced shrub	0.08	Low	2	Poor	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	1
Urban		Vegetated garden	0.61	Low	2	Poor	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	1
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		Total area	1.90								
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rget onlyear	created in	starting habitat	Standard or adjusted time to target condition	target condition/year	Final time to target multiplier	Standard difficulty of creation	Applied difficulty multiplier	Final difficulty of creation	Difficulty multiplier applied	units delivered	Assessor comments				
			Standard time to target condition applied	0	1.000	Low	Standard difficulty applied	Medium	0.67	0.00					
		9	Standard time to target condition applied	1	0.965	Low	Standard difficulty applied	Low	1	0.15					
			Standard time to target condition applied	1	0.965	Low	Standard difficulty applied	Low	1	1.18					
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A-3 Site	e Habitat Enhancement											
Cond	dense / Show Columns Condense / Show Rows	:										
	Main Menu Instructions											
			Baseline habitats									
Baselin e ref	Baseline habitat	habit at	Baseline distinctivene ss band	Baseline distinctivene ss score	Baseline condition category	Baseline condition score	strategic significance	Baseline strategic significance	Baseline habitat units	Suggested action to address habitat losses	Proposed I	
1	Heathland and shrub - Mixed scrub	0.362	Medium	4	Moderate	2	Low Strategic Significance	1	2.90	Same broad habitat or a higher distinctiveness habitat required	Heathland and shrub	\Box
2	: Grassland - Other neutral grassland		Medium	4	Poor	1	Low Strategic Significance	1	7.60	Same broad habitat or a higher distinctiveness habitat required	Grassland	
4	Heathland and shrub - Hawthorn scrub	0.028	Medium	4	Moderate	2	Low Strategic Significance	1	0.22	Same broad habitat or a higher distinctiveness habitat required	Heathland and shrub	
7	Woodland and forest - Other woodland; broadleaved	0.45	Medium	4	Moderate	2	Low Strategic Significance	1	3.60	Same broad habitat or a higher distinctiveness habitat required	₩oodland and forest	
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Post development/ post intervention habitats														
tat (Pre-Populated but can be overridden)	Change in distinctive	eness and condition	Area	Di vi		0 - 10		Strategic signific	ance					
Proposed habitat	Distinctiveness change	Condition change	(hectare s)	Distinctivene ss	Score	Conditio	Score	Strategic significance	Strategic significanc e	position	to target condition/gea	a		
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			
			3											
												_		
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			1.09											

			12										
	7.7	risk multiplier				Difficulty risk mul	-		Habitat	Comments			
Habitat enhanced in advance/years	habitat enhancement/yea	Standard or adjusted time to target condition	target condition/ye	Final time to target multiplier	difficulty of enhanceme	Applied difficulty multiplier	difficulty of enhancemen	Difficulty multiplier applied	units delivered	Assessor comments	Reviewer comments		
	\$5.00	Standard time to target condition applied		0.899	Low	Standard difficulty applied	Low	1		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 follwed 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		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		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		
- 1							8	3					
					1								
									10.15				