

**Land North East of Harpenden**  
between Lower Luton Road, Bowers Heath Lane and Common Lane

## **Biodiversity Net Gain Assessment**

March 2026

| Quality Management     |                                  |
|------------------------|----------------------------------|
| <b>Client:</b>         | Crest Nicholson                  |
| <b>Project:</b>        | Land North East of Harpenden     |
| <b>Report Title:</b>   | Biodiversity Net Gain Assessment |
| <b>Project Number:</b> | 1006818                          |
| <b>File Reference:</b> | 6818 BNGA vf7 AP/LB              |
| <b>Date:</b>           | 09/03/2026                       |

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# 1 Introduction

## 1.1 Background and Proposals

1.1.1 Aspect Ecology is advising Crest Nicholson ('Crest') in respect of proposed development of land North East of Harpenden between Lower Luton Road, Bowers Heath Lane and Common Lane, centred at grid reference TL 14570 16068 (see Plan 6818/ECO1), hereafter referred to as 'the site'.

1.1.2 **Description of Development:** Outline Application for demolition of existing buildings and structures and construction of a mixed-use development comprising residential dwellings (including affordable housing), children's home, elderly extra care facility, local centre (flexible retail/ health/ community use), sports pitches and associated building, green infrastructure and landscaping works (to include public open space and community growing space); primary school with early years provision, vehicular and active travel infrastructure (including pedestrian and cycle access) and diversion of Bower Heath Lane; drainage works; and related infrastructure. All matters reserved save for access from Lower Luton Road.

1.1.3 **Planning Policy Position:** St Alban's District Council's (SADC's) adopted Development Plan comprises:

- District Local Plan Review 1994 Saved and Deleted Policies Version (July 2020), and supporting Maps;
- Harpenden Neighbourhood Plan 2018 – 2033 (2018); and
- Wheathampstead Neighbourhood Plan (2023).

1.1.4 The NPPF (February 2025) is a material consideration.

1.1.5 SADC is preparing a new emerging draft Local Plan. The Regulation 19 version is the latest version and weight can be given to it due to the advanced stage in preparation (i.e. it is progressing towards Stage 2 Hearing in Autumn 2025). The Draft Local Plan comprises:

- Draft Local Plan 2041 – Reg.19 Publication (September 2024); and
- Draft Policies Map.

1.1.6 Adoption of the new Local Plan is anticipated to take place in March 2026.

1.1.7 **Allocation:** The site comprises circa 32 hectares of the wider North East Harpenden allocation. The land to the south west is under the control of Miller Homes. The land to the south east is under the control of M E Simons Trust & Wimms, the land located to the south of this is under the control of Sauncey View Lodge.

1.1.8 The emerging new Local Plan includes the Site within the North East Harpenden Broad Location B2 for:

- A comprehensive mixed-use development
- Residential (circa 750 homes, plus Extra Care provision)
- 2 Form Entry Primary School (inc. Early Years)
- Local Centre

- On-site sports provision
- Other green infrastructure
- Improvements to transport infrastructure, including links to Katherine Warrington Secondary School.

1.1.9 Crest's land comprises the largest portion of the allocation. Crest is committed to working collaboratively with all neighbouring landowners and promoters to achieve the SADC's aspirations for North East Harpenden.

1.1.10 In progressing a collaborative approach, a Joint Illustrative Masterplan has been developed between all parties.

1.1.11 To inform the planning application, Aspect Ecology has undertaken a Biodiversity Net Gain (BNG) assessment to determine the level of BNG that can be achieved under the scheme. This work is based on the Statutory Biodiversity Metric tool<sup>1</sup> issued by Defra and informed by associated guidance issued by Defra, in combination with guidance developed by CIRIA, CIEEM and IEMA.

## 1.2 Biodiversity Net Gain Legislation, Policy and Best Practice

### Legislation

1.2.1 In England, Biodiversity Net Gain has been mandatory since 12<sup>th</sup> February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as amended) (as inserted by Schedule 14 of the Environment Act 2021).

1.2.2 Schedule 7A (Part 2) identifies that planning permissions in England (with certain exceptions) are deemed to have been granted subject to a condition requiring the submission of a *Biodiversity Gain Plan* prior to commencement of development. The Biodiversity Gain Plan must include details in regard to Biodiversity Net Gain, demonstrating how the development will achieve a gain in calculated biodiversity value of at least 10%.

1.2.3 Government advice<sup>2</sup> sets out the information LPAs require in order to consider BNG as part of a planning application, in line with Section 7(1A) of The Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). In particular, this sets out that planning applications should be accompanied by the following information (alongside references to where this can be located in this report):

- A statement confirming whether the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition (see section 1.3 of this report)
- In cases where the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition:
  - i. the pre-development ("baseline") biodiversity value of the on-site habitat on the date of application (or an earlier date) including the completed Metric calculation tool (showing the calculations, the publication date and version of the Metric used to calculate that value) (see Table 3.1 and Appendix 6818/BNG2 of this report)

<sup>1</sup> Statutory Biodiversity Metric (2024) Auditing and Accounting for Biodiversity Calculation Tool

<sup>2</sup> Defra (2023) 'Biodiversity net gain: what local planning authorities should do', updated 28/11/24

- ii. where the applicant wishes to use an earlier date, the proposed earlier date and the reasons for that date (not applicable to this project)
- iii. a statement confirming whether the biodiversity value of the on-site habitat is lower on the date of application (or an earlier date) because of the carrying on of activities ('degradation') (see Section 3.2 of this report)
- iv. where unauthorised degradation has taken place between 30<sup>th</sup> January 2020 and the submission of the planning application, the relevant date should be immediately before these activities were carried out (not applicable to this project)
- v. a description of any irreplaceable habitat on the land, that exists on the date of application (or an earlier date) (see Section 3.3 of this report)
- vi. a plan drawn to an identified scale (including the direction of north), showing on-site habitat existing on the date of application (or an earlier date), and any irreplaceable habitat (see Plan 6818/BNG1)

### Local Policy

1.2.4 The St Albans District Local Plan adopted in 1994 does not include policies directly relating to Biodiversity Net Gain. However, policies directly relating to biodiversity net gain are outlined within the emerging Draft Local Plan 2041 – Reg. 19 Publication (September 2024). Policy NEB6 relates specifically to Biodiversity Net Gain, which states that a biodiversity net gain of at least 10% is necessary for relevant new developments, alongside the long-term management and maintenance (at least 30 years) for existing and new biodiversity, including net gains.

1.2.5 Further supporting guidance, relating specifically to trees and Biodiversity Net Gain is set out within the Harpenden Neighbourhood Plan, dated February 2019. Policy ESD13 states that "efforts to enhance biodiversity, such as through the creation of new habitats.... Will be supported...". Policy ESD14 states that "it is important that there is no net loss of trees in the Neighbourhood Plan Area, with any loss counterbalanced with a net gain of appropriate replacement trees. Preferably these should be native or fruit/nut trees due to the biodiversity value brought by these trees."

### Good Practice Principles for Development

1.2.6 CIRIA, CIEEM and IEMA have developed a set of principles on good practice to achieve Biodiversity Net Gain<sup>3</sup>, accompanied by a practical guide<sup>4</sup>. These principles provide a framework that helps improve the UK's biodiversity by contributing towards strategic priorities to conserve and enhance nature while progressing with sustainable development. They also provide a way for industry to show that projects follow good practice. Ten key principles are identified:

- 1) **Apply the Mitigation Hierarchy:** Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.

<sup>3</sup> CIEEM, CIRIA, IEMA (2016) 'Biodiversity Net Gain: Good practice principles for development'

<sup>4</sup> CIEEM, CIRIA, IEMA (2019) 'Biodiversity Net Gain. Good practice principles for development: A practical guide'

- 2) **Avoid losing biodiversity that cannot be offset by gains elsewhere:** Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve no net loss or Net Gain.
- 3) **Be inclusive and equitable:** Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible.
- 4) **Address risks:** Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.
- 5) **Make a measurable Net Gain contribution:** Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
- 6) **Achieve the best outcomes for biodiversity:** Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when:
  - Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses
  - Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation
  - Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels
  - Enhancing existing or creating new habitat
  - Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity
- 7) **Be additional:** Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).
- 8) **Create a Net Gain legacy:** Ensure Net Gain generates long-term benefits by:
  - Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity
  - Planning for adaptive management and securing dedicated funding for long-term management
  - Designing Net Gain for biodiversity to be resilient to external factors, especially climate change
  - Mitigating risks from other land uses
  - Avoiding displacing harmful activities from one location to another
  - Supporting local-level management of Net Gain activities
- 9) **Optimise sustainability:** Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
- 10) **Be transparent:** Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

### **1.3 Statement on Whether Biodiversity Gain Condition Applies and Purpose of this Report**

- 1.3.1** Based on the site proposals and habitats present, it is considered that a planning permission, if granted in respect of the proposals, would be subject to the Biodiversity Gain planning condition under the legislation. Accordingly, this report provides a BNG assessment, including details of the existing calculated biodiversity value(s) and associated information, accompanied by a completed Metric calculation tool (Excel workbook) in line with the legislative requirements. In addition, going beyond the scope of the statutory BNG requirements, this report provides an initial assessment of the likely net change in biodiversity value under the proposed development, and a high-level consideration of how a 10% gain can be delivered.



## 2 Methodology

### 2.1 Baseline Habitat Survey

- 2.1.1 The site was surveyed in May and July 2024 in order to ascertain the general ecological value of the land contained within the boundaries of the site and to identify the main habitats and ecological features present.
- 2.1.2 The site was surveyed based on standard Phase 1 Habitat Survey methodology<sup>5</sup>, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. The site was classified into areas of similar botanical community types, with a representative species list compiled for each habitat identified. Habitats were classified in accordance with the UK Habitat Classification system, version 2.0<sup>6</sup>, and condition assessed in accordance with the methodology set out in the Metric Technical Annex<sup>7</sup> and using professional judgement. In line with guidance<sup>8</sup>, the fine scale minimum mapping unit of 25sqm or 5m in length has been used where possible/relevant.

### 2.2 Survey Constraints and Limitations

- 2.2.1 All of the species that occur in each habitat would not necessarily be detectable during survey work carried out at any given time of the year, since different species are apparent during different seasons. However, the Phase 1 habitat survey was undertaken within the optimal season, therefore allowing a robust assessment of the habitats and botanical interest across the site to be made.

### 2.3 Biodiversity Net Gain Assessment

- 2.3.1 To quantify the level of BNG that can be delivered under the proposed development, the change in biodiversity value resulting from the scheme has been calculated using the Metric calculation tool, as informed by the associated User Guide<sup>9</sup>. This takes account of the size, distinctiveness and ecological condition of existing and proposed habitat areas to provide a proxy measure of the present and forecast biodiversity value of a site, and therefore determine the overall change in biodiversity value.
- 2.3.2 In line with the 'information that LPA's require' (see paragraph 1.2.3. above), the pre-development ('baseline') biodiversity value of the on-site habitat has been calculated based on the habitat survey information collected during the baseline habitat survey (see Section 2.1 above).
- 2.3.3 Going beyond the minimum statutory requirements (which only require the baseline habitat value to be defined at the planning application stage – see paragraph 1.2.3 above), the post-development biodiversity value has also been calculated, based on drawing 'BMD.24.0039.DR.002 Landscape Framework Plan'. A number of assumptions have been made in terms of the landscaping and management proposals, based on comparative developments and what is realistic and feasible under the proposed land uses and

<sup>5</sup> Joint Nature Conservation Committee (2010, as amended) 'Handbook for Phase 1 habitat survey: A technique for environmental audit'

<sup>6</sup> UKHab Ltd (2023) - UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)

<sup>7</sup> Statutory Biodiversity Metric - Technical Annex 1 - Condition Assessment Sheets and Methodology

<sup>8</sup> The UK Habitat Classification User Manual Version 1.1 (2020)

<sup>9</sup> Defra (February 2024) 'The Statutory Biodiversity Metric – User Guide'

landscape space types. Further details of assumptions made in populating the metric are provided in Chapter 4 below.

## 2.4 Irreplaceable Habitats

- 2.4.1 Irreplaceable habitats are now defined under The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and include blanket bog, lowland fens, limestone pavements, coastal sand dunes, ancient woodland, ancient trees and veteran trees, spartina saltmarsh swards and mediterranean saltmarsh scrub. Irreplaceable habitats are excluded from BNG, as losses to them cannot be offset to achieve net gain.

## 2.5 Strategic Significance

- 2.5.1 Strategic significance refers to the local significance of habitat parcels based on their location and the habitat type. The Metric gives additional unit value to habitat parcels that are mapped within a published Local Nature Recovery Strategy (LNRS) or, where no LNRS has been published, to habitats mapped/listed in alternative documents specified by the Local Planning Authority (e.g. Draft LNRS, Local Plans, Biodiversity Action Plans, Green Infrastructure Strategies). Strategic significance has been assigned to the baseline and post-development habitats in accordance with the methodology set out in Tables 7 and 8 of the User Guide, as follows:

- High (formally identified in local strategy)
- Medium (location ecologically desirable but not in local strategy)
- Low (area/compensation not in local strategy)

## 3 Pre-development ('Baseline') Habitats

### 3.1 Overview

- 3.1.1 Descriptions of the existing habitats are set out in detail within the Baseline Ecological Appraisal prepared by Aspect Ecology, dated February 2026 (ref. 6818 EcoBaseline vf6).
- 3.1.2 Detailed condition assessment sheets are provided at Appendix 6818/BNG1, with habitat locations depicted on Plan 6818/BNG1.

### 3.2 Degradation

- 3.2.1 During the survey work undertaken in May and July 2024 no evidence was recorded to suggest that any activities of the type mentioned in paragraph 6 or 6A of Schedule 7A to the Town and Country Planning Act 1990 (as amended) have occurred since 30<sup>th</sup> January 2020. Accordingly, the baseline habitat value is considered to be as recorded during the survey work, which remains up to date at the current time in line with standard guidance<sup>10</sup>.

### 3.3 Irreplaceable Habitats

- 3.3.1 No irreplaceable habitats are present within the site.

### 3.4 Strategic Significance

- 3.4.1 None of the habitats within the site are mapped within a published LNRS or any specified alternative documents. Therefore, in accordance with the User Guide, low strategic significance has been applied to the pre-development habitats.

### 3.5 Pre-development Biodiversity Value of On-site Habitats

- 3.5.1 The pre-development biodiversity value of the on-site habitats has been calculated using the Statutory Biodiversity Metric. A full copy of the Metric is provided as a separate Excel workbook. The overall pre-development biodiversity value of the on-site habitat is set out within Table 3.1 (below).

**Table 3.1.** Pre-development ('Baseline') Biodiversity Value of the On-site Habitat\*

| On-site Baseline         | Overall Units |
|--------------------------|---------------|
| Area habitats            | 131.80        |
| Hedgerows and tree lines | 15.70         |
| Watercourse              | N/A           |

\* Based on the Statutory Biodiversity Metric, Published 29 November 2023, Updated 23 July 2024

<sup>10</sup> CIEEM (April 2019) 'On the lifespan of ecological reports and surveys'

## 4 Post-development Habitats and BNG Assessment Result (Preliminary Assessment)

### 4.1 Introduction

- 4.1.1 The BNG legislation places a duty on Local Planning Authorities to request the pre-development biodiversity value of the on-site habitat on the date of application (or an earlier date) as part of qualifying planning applications. This information is provided in the previous chapter of this report. Going beyond the scope of the statutory requirements, this chapter considers the likely change in biodiversity value as a result of the proposed development. Such information is not required under the legislation until planning has been approved (to be set out within a Biodiversity Gain Plan), but this information is provided now in order to provide the LPA with a guide as to how a 10% gain in biodiversity can be delivered.

### 4.2 Assumptions

- 4.2.1 When inputting the post-development habitat areas and conditions to the Metric, the following assumptions have been made:

- Newly created habitat under the proposals will be managed appropriately to reach the assigned target condition (anticipated to be defined by a future management plan)
- Areas of grassland associated with natural and semi-natural greenspace can be retained and enhanced
- Aside from enhanced grassland and retained woodland, individual trees and hedgerows, all other habitats are assumed as being lost and recreated
- Habitat creation is proposed to be delivered in accordance with BMD's Open Space & Habitat Assumptions (see Appendix 6818/3). This has been interpreted as follows:
  - The proposed natural and semi-natural greenspace in the north will comprise 50% moderate condition other neutral grassland (enhanced from existing poor condition other neutral grassland), 20% moderate condition broadleaved woodland, 10% moderate condition mixed scrub, 10% poor condition modified grassland, 5% poor condition other neutral grassland (SuDS), and 5% hardstanding
  - The proposed allotments and community gardens will comprise 60% poor condition allotments and 40% poor condition traditional orchards
  - The proposed areas of amenity green space will comprise 40% poor condition other neutral grassland, 20% poor condition modified grassland, 10% introduced shrub, 10% hardstanding, 10% moderate condition mixed scrub, 5% poor condition other neutral grassland (SuDS), and 5% poor condition broadleaved woodland
  - For BNG purposes, the proposed children's play areas are considered to comprise hardstanding

- The proposed parks and gardens will comprise 50% poor condition other neutral grassland, 20% poor condition modified grassland, 15% moderate condition mixed scrub, 10% hardstanding and 5% poor condition broadleaved woodland
- The proposed outdoor sports facilities will comprise 90% poor condition modified grassland and 10% hardstanding
- All newly planted trees are assumed to be of small size and poor condition, of which a conservative estimate of 200 has been included in the Metric calculations
- Newly created species-rich native hedgerow will be managed to achieve at least moderate condition, of which a conservative estimate of 510m has been included in the Metric calculations

### 4.3 Strategic Significance

- 4.3.1 No strategic significance has been applied to the post-development habitats within the site.

### 4.4 Habitat Type and Condition

- 4.4.1 Summaries of the proposed post-development habitat creation/enhancement are set out in Tables 4.1 and 4.2 below. Post-development habitat locations are shown on Plan 6818/BNG2.

**Table 4.1.** Post-development On-site Habitat Creation

| Habitat                        | Target Condition | Condition Rationale                                                                                                                                                                                                                                                                                                |
|--------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Developed Land; Sealed Surface | N/A              | This includes all roads, parking and buildings within the site. No assessment for the condition of this habitat is required.                                                                                                                                                                                       |
| Vegetated garden               | N/A              | This includes the gardens of the proposed properties. No assessment for the condition of this habitat is required.                                                                                                                                                                                                 |
| Rural Trees                    | Poor             | Native trees to be planted throughout the site within areas of open space and adjacent the built development, expected to achieve at least poor condition within 10 years with suitable management.                                                                                                                |
| Traditional orchards           | Poor             | Comprising 40% of the proposed allotments and community gardens, expected to achieve poor condition.                                                                                                                                                                                                               |
| Allotments                     | Poor             | Comprising 60% of the proposed allotments and community gardens, expected to achieve poor condition.                                                                                                                                                                                                               |
| Introduced shrub               | N/A              | Comprising 10% of the amenity green space. No assessment for the condition of this habitat is required.                                                                                                                                                                                                            |
| Modified grassland             | Poor             | Areas of amenity grassland to be created near to the built development. Through planting of an appropriate species-rich mix, management to prevent encroachment of scrub and bracken as well as an absence of non-native species this habitat is anticipated to achieve at least a poor condition within one year. |
| Mixed Scrub                    | Moderate         | Mixed scrub will be planted among the amenity green space, parks and gardens, and natural and semi-natural green space. Through planting of appropriate native woody species and suitable management they are anticipated to achieve moderate condition within 5 years.                                            |

|                                             |               |                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Other neutral grassland                     | Poor          | Other neutral grassland will be created within the amenity greenspace and parks and gardens. This will involve planting of an appropriate species-rich mix, management to prevent encroachment of scrub and bracken as well as an absence of non-native species. Due to recreational pressure these areas are not expected to exceed poor condition.                                                                    |
| Other woodland;<br>broadleaved              | Moderate/Poor | Planted within amenity green space, parks and gardens, and natural and semi-natural green space. With appropriate management, woodland created in the natural and semi-natural green space is expected to reach moderate condition within 15 years. Due to recreational pressure and the small size of these parcels, woodlands in amenity green space and parks and gardens are not expected to exceed poor condition. |
| Artificial unvegetated,<br>unsealed surface | N/A           | Included within the amenity green space, children's play areas, parks and gardens, natural and semi-natural green space, and outdoor sports facilities. No assessment for the condition of this habitat is required.                                                                                                                                                                                                    |

**Table 4.2.** Post-development On-site Habitat Enhancement

| Habitat                 | Target Condition | Condition Rationale                                                                                                                                                                    |
|-------------------------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Other neutral grassland | poor -> moderate | Areas of retained other neutral grassland will be subject to an appropriate management plan to enhance their condition. Moderate condition is expected to be achieved within 10 years. |

**Table 4.3.** Post-development On-site Linear Feature (Hedgerow) Creation

| Habitat                      | Target Condition | Condition Rationale                                                                                                                                                                                                                                                                                                      |
|------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Species-rich native Hedgerow | Moderate         | It is anticipated that there is scope within the site for species-rich native hedgerow to be created within areas of open space and adjacent the built development. A conservative estimate of 0.55km has been applied. Through suitable management this habitat is expected to reach moderate condition within 5 years. |

## 4.5 Anticipated Change in Biodiversity

- 4.5.1 The anticipated change in biodiversity value as a result of the proposals has been calculated using the Statutory Biodiversity Metric, based on the assumptions and considerations set out above. A copy of the Metric is provided separately as an Excel workbook and relevant extracts from the completed calculator tool are provided at Appendix 6818/BNG2.
- 4.5.2 When considering the current proposals, the Metric calculates that the development will likely result in the following changes in biodiversity, summarised in Table 4.3 (below):

**Table 4.3.** Anticipated Change in Biodiversity

|                                  | Change in Units               | % Change | Trading Rules Satisfied? |
|----------------------------------|-------------------------------|----------|--------------------------|
| On-site Habitats                 | -52.46                        | -39.80   | No                       |
| On-site Hedgerows and Tree Lines | +1.59                         | +10.16%  | Yes                      |
| On-site Watercourses             | N/A – No watercourses present |          |                          |

- 4.5.3 On the basis of the considerations and proposals set out (including the assumptions and limitations discussed above and within the comments in the spreadsheet tool), the Statutory Metric calculator indicates a net biodiversity unit change of -52.46 Habitat Units (representing a calculated loss of 39.80%) and +1.59 Hedgerow Units (representing a calculated gain of 10.16%) within the site boundary.
- 4.5.4 As can be seen from the above, under the proposed development a 10% net gain in habitat units will not be delivered within the site itself. To achieve a 10% net gain in habitat units and satisfy trading rules, a minimum of 65.64 units are required. A 10% gain of hedgerow units will be delivered within the site itself, so off-site hedgerow units are not required.
- 4.5.5 If off-site units are purchased outside of the site's LPA or National Character Area (NCA), a spatial risk multiplier will be applied. For units within a neighbouring LPA/NCA, the required number of units is multiplied by 1.3. For units at a national level, the required number of units is multiplied by 2.
- 4.5.6 Under the relevant legislation, consideration of how the 10% gain will be delivered is determined post-planning, via a Biodiversity Gain Plan. Given the outline nature of the proposals, there is scope to incorporate additional habitat creation in the detailed design of the scheme which would serve to reduce the current losses. In particular, it would be readily possible to include the required hedgerow planting to achieve a 10% gain in hedgerow units.
- 4.5.7 If offsite offsetting is required, these would be best delivered through a local offsetting option (within the same LPA or NCA). Alternatively, the off-site BNG units could be delivered through a national BNG broker, subject to the application of the relevant spatial risk multiplier, where relevant. Finally, as a last resort, the off-site BNG units can be delivered by purchasing the government's statutory biodiversity credits. The exact approach to be pursued can be confirmed by way of a Biodiversity Gain Plan following grant of planning permission.

## 4.6 Biodiversity Gain Hierarchy

- 4.6.1 The Biodiversity Gain Hierarchy and its implications for the purpose of the statutory framework for BNG is set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This hierarchy (which does not apply to irreplaceable habitats) sets out a list of priority actions:
- i. firstly, in relation to on-site habitats which have a medium, high and very high distinctiveness (a score of four or more according to the Statutory Biodiversity Metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects.
  - ii. secondly, in relation to all on-site habitats which are adversely affected by the development, the adverse effect should be compensated for by prioritising, in order: the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits.
- 4.6.2 In relation to point (i), Lowland mixed deciduous woodland forms a high distinctiveness habitat within the site. Other neutral grassland, bramble scrub and individual trees form medium distinctiveness habitats on site. It has not been feasible to entirely avoid adverse effects on these habitats, and therefore mitigation is proposed.

- 4.6.3 In relation to point (ii), adverse effects will be compensated for by enhancing existing on-site habitats, creating new on-site habitats and purchasing off-site units.



## 5 Summary and Conclusions

- 5.1 Aspect Ecology is advising Crest Nicholson in respect of proposed development of land North East of Harpenden between Lower Luton Road, Bowers Heath Lane and Common Lane.
- 5.2 BNG is a process that is considered both during the determination of planning applications and post-planning via a number of set documents (including a Biodiversity Gain Plan and, where required, a Habitat Management and Monitoring Plan). Following amendments to Schedule 7A of the Town and Country Planning Act 1990, government advice has been published which sets out the information that LPAs require in order to consider BNG as part of a planning application. The necessary information is included within this report, thereby satisfying the LPA's statutory requirements under the BNG legislation.
- 5.3 In addition, going beyond the scope of the statutory requirements (which only require the baseline habitat value to be defined at the planning application stage – see paragraph 1.2.3 above), a preliminary BNG assessment of the post-development value has been undertaken. This assessment concludes that the proposed development will result in a net loss in habitat units amounting to 52.46 units (39.80%), and a net gain of hedgerow units amounting to 1.59 units (10.16%). To achieve a 10% net gain in habitat units, a total of 65.64 habitat units would therefore be required, either to be incorporated into the detailed design of the scheme or utilising offsite units.

## **Plan 6818/BNG1:**

Pre-development Habitat Mapping

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- Key:
- Site Boundary
  - Artificial unvegetated, unsealed surface (0.4300ha)
  - Bramble scrub (0.0050ha)
  - Developed land; sealed surface: Building (0.3850ha)
  - Developed land; sealed surface: Hardstanding (0.8925ha)
  - Lowland mixed deciduous woodland - Moderate Condition (0.8250ha)
  - Modified grassland - Poor Condition (0.2350ha)
  - Other neutral grassland - Poor Condition (29.9500ha)
  - Tall forbs - Moderate Condition (0.1750ha)
  - Vegetated garden (0.0775ha)
  - Native hedgerow (2.65km)
  - Tree [21]



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Lower Luton Road, Harpenden

PROJECT

Pre-development Habitat Mapping

TITLE

6818/BNG1

DRAWING NO.

H/DO

REV

February 2026

DATE

LB/DO

QC



## **Plan 6818/BNG2:**

Post-development Habitat Mapping

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- Key:
- Site Boundary
  - Proposed Allotments & Community Gardens (0.5425ha)
  - Proposed Amenity Green Space (2.3025ha)
  - Proposed Children's Play Areas (0.1325ha)
  - Proposed Developed land; development area (Residential 12.2825ha and Gardens 5.2650ha)
  - Proposed Natural & Semi-Natural Greenspace (8.2450ha)
  - Proposed Outdoor Sports Facilities (2.6650ha)
  - Proposed Parks and Gardens (0.9225ha)
  - Retained Developed land; sealed surface: Hardstanding (0.1425ha)
  - Retained Lowland mixed deciduous woodland (0.4750ha)
  - Retained Rural Tree [11]
  - Retained Native hedgerow (2.18km)

0 40 80 120 160 m

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Lower Luton Road, Harpenden

Post-development Habitat Mapping

6818/BNG2

H/JP

February 2026

LB/DO

PROJECT

TITLE

DRAWING NO.

REV

DATE

QC



Based on Proposed Parameters Plan: Landscape Framework Plan Drawing Ref: BMD.24.0039.DR.002, dated 14/10/2025

## **Appendix 6818/BNG1**

### Habitat Condition Assessment Sheets



**PROJECT NAME:** Lower Luton Road, Harpenden  
**PROJECT NUMBER:** 6818

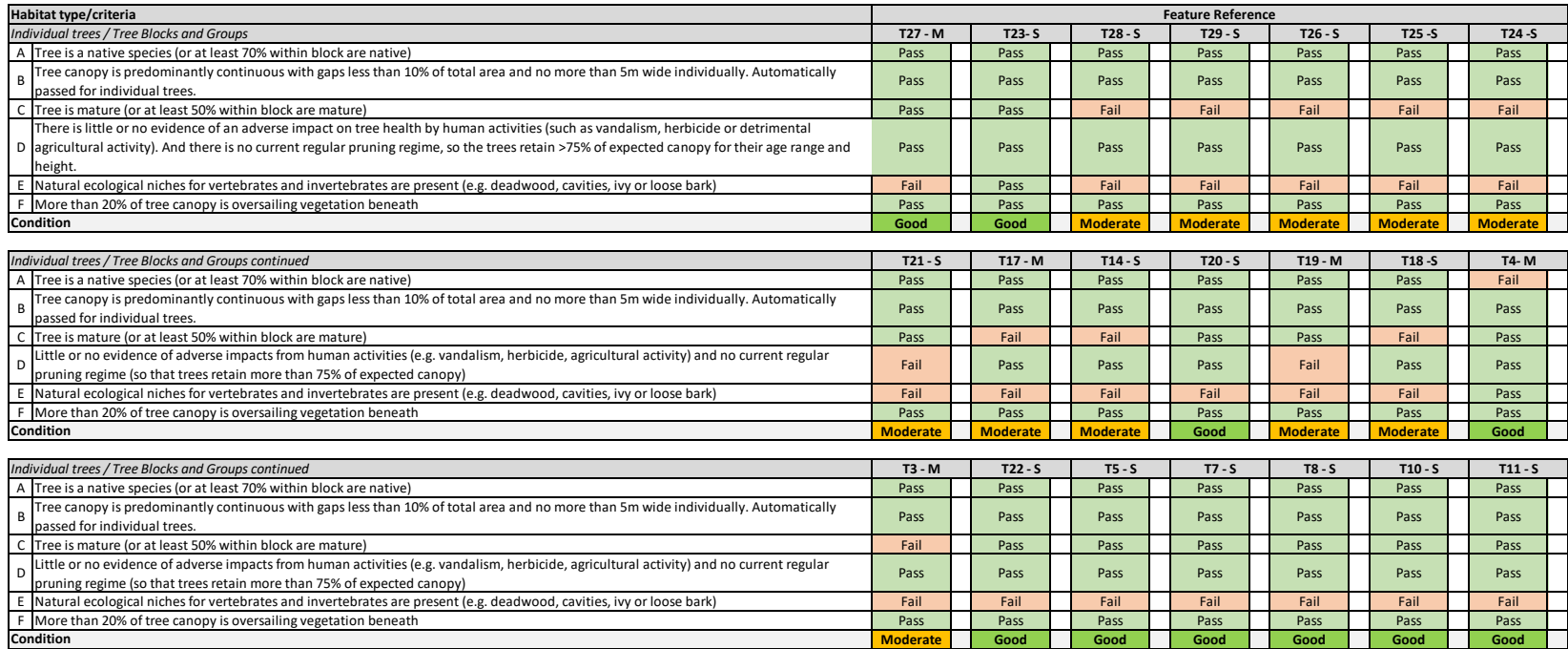
[illegible]

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[illegible]

**PROJECT NAME:** Lower Luton Road, Harpenden  
**PROJECT NUMBER:** 6818



# Native Hedgerow Condition Assessment Calculator

| Hedgerow Condition Assessment |                              |      |      |      |      |      |      |      |      |                 |
|-------------------------------|------------------------------|------|------|------|------|------|------|------|------|-----------------|
| Hedge No.                     | Hedgerow Habitat Description | A1   | A2   | B1   | B2   | C1   | C2   | D1   | D2   | Condition Score |
| H1                            | Native hedgerow              | Pass | Pass | Pass | Fail | Pass | Pass | Pass | Pass | Good            |
| H2                            | Native hedgerow              | Pass | Pass | Pass | Pass | Pass | Fail | Pass | Pass | Good            |
| H3                            | Native hedgerow              | Pass | Pass | Fail | Pass | Pass | Pass | Pass | Pass | Good            |
| H4                            | Native hedgerow              | Pass | Fail | Pass | Pass | Pass | Fail | Pass | Pass | Good            |
| H5                            | Native hedgerow              | Pass | Pass | Pass | Pass | Pass | Fail | Pass | Pass | Good            |
| H6                            | Native hedgerow              | Pass | Pass | Pass | Fail | Pass | Pass | Pass | Pass | Good            |
| H7                            | Native hedgerow              | Pass | Pass | Pass | Fail | Pass | Fail | Pass | Pass | Good            |
| H8                            | Native hedgerow              | Pass | Pass | Pass | Pass | Pass | Fail | Pass | Pass | Good            |
| H9                            | Native hedgerow              | Pass | Pass | Pass | Pass | Pass | Pass | Pass | Pass | Good            |
| H10a                          | Native hedgerow              | Pass | Pass | Pass | Pass | Pass | Pass | Pass | Pass | Good            |
| H10b                          | Native hedgerow              | Pass | Fail | Pass | Pass | Pass | Fail | Pass | Pass | Good            |
| H11                           | Native hedgerow              | Pass | Pass | Pass | Pass | Pass | Pass | Pass | Pass | Good            |
| H12                           | Native hedgerow              | Pass | Pass | Pass | Pass | Pass | Pass | Pass | Pass | Good            |
| H13                           | Native hedgerow              | Pass | Pass | Fail | Fail | Pass | Pass | Pass | Pass | Moderate        |
| H14                           | Native hedgerow              | Pass | Pass | Pass | Pass | Pass | Fail | Pass | Pass | Good            |
| H15                           | Native hedgerow              | Pass | Pass | Pass | Pass | Pass | Fail | Pass | Pass | Good            |
| H16                           | Native hedgerow              | Pass | Pass | Pass | Pass | Pass | Fail | Pass | Pass | Good            |

*\*If more rows are required, unhide them rather than copying or dragging down.*

## Appendix 6818/BNG2

Relevant Output from the Statutory Biodiversity Metric  
Calculation Tool

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|                                 |
|---------------------------------|
| Lower Luton Road, Harpenden     |
| Headline Results                |
| Scroll down for final results ▲ |

Return to results menu

|                                                                                    |                   |        |         |                                            |
|------------------------------------------------------------------------------------|-------------------|--------|---------|--------------------------------------------|
| On-site baseline                                                                   | Habitat units     | 131.80 |         |                                            |
|                                                                                    | Hedgerow units    | 15.70  |         |                                            |
|                                                                                    | Watercourse units | 0.00   |         |                                            |
| On-site post-intervention<br>(Including habitat retention, creation & enhancement) | Habitat units     | 79.34  |         |                                            |
|                                                                                    | Hedgerow units    | 17.29  |         |                                            |
|                                                                                    | Watercourse units | 0.00   |         |                                            |
| On-site net change<br>(units & percentage)                                         | Habitat units     | -52.46 | -39.80% | On-site net gain is less than target set ▲ |
|                                                                                    | Hedgerow units    | 1.59   | 10.16%  |                                            |
|                                                                                    | Watercourse units | 0.00   | 0.00%   |                                            |

|                                                                                     |                   |      |       |  |
|-------------------------------------------------------------------------------------|-------------------|------|-------|--|
| Off-site baseline                                                                   | Habitat units     | 0.00 |       |  |
|                                                                                     | Hedgerow units    | 0.00 |       |  |
|                                                                                     | Watercourse units | 0.00 |       |  |
| Off-site post-intervention<br>(Including habitat retention, creation & enhancement) | Habitat units     | 0.00 |       |  |
|                                                                                     | Hedgerow units    | 0.00 |       |  |
|                                                                                     | Watercourse units | 0.00 |       |  |
| Off-site net change<br>(units & percentage)                                         | Habitat units     | 0.00 | 0.00% |  |
|                                                                                     | Hedgerow units    | 0.00 | 0.00% |  |
|                                                                                     | Watercourse units | 0.00 | 0.00% |  |

|                                                                                                          |                   |        |  |  |
|----------------------------------------------------------------------------------------------------------|-------------------|--------|--|--|
| Combined net unit change<br>(Including all on-site & off-site habitat retention, creation & enhancement) | Habitat units     | -52.46 |  |  |
|                                                                                                          | Hedgerow units    | 1.59   |  |  |
|                                                                                                          | Watercourse units | 0.00   |  |  |
| Spatial risk multiplier (SRM) deductions                                                                 | Habitat units     | 0.00   |  |  |
|                                                                                                          | Hedgerow units    | 0.00   |  |  |
|                                                                                                          | Watercourse units | 0.00   |  |  |

FINAL RESULTS

|                                                                                                       |                   |        |  |  |
|-------------------------------------------------------------------------------------------------------|-------------------|--------|--|--|
| Total net unit change<br>(Including all on-site & off-site habitat retention, creation & enhancement) | Habitat units     | -52.46 |  |  |
|                                                                                                       | Hedgerow units    | 1.59   |  |  |
|                                                                                                       | Watercourse units | 0.00   |  |  |

|                                                                                                    |                   |         |                                                   |
|----------------------------------------------------------------------------------------------------|-------------------|---------|---------------------------------------------------|
| Total net % change<br>(Including all on-site & off-site habitat retention, creation & enhancement) | Habitat units     | -39.80% | Total net gain achieved is less than target set ▲ |
|                                                                                                    | Hedgerow units    | 10.16%  |                                                   |
|                                                                                                    | Watercourse units | 0.00%   |                                                   |

|                          |                                |
|--------------------------|--------------------------------|
| Trading rules satisfied? | No - Check Trading Summaries ▲ |
|--------------------------|--------------------------------|

| Unit Type         | Target | Baseline Units | Units Required | Unit Deficit |
|-------------------|--------|----------------|----------------|--------------|
| Habitat units     | 10.00% | 131.80         | 144.98         | 65.64        |
| Hedgerow units    | 10.00% | 15.70          | 17.27          | 0.00         |
| Watercourse units | 10.00% | 0.00           | 0.00           | 0.00         |

No additional hedgerow units required to meet target ✓  
No additional watercourse units required to meet target ✓

Input errors/rule breaks present in metric ▲

## **Appendix 6818/BNG3**

### Open Space & Habitat Assumptions



## OPEN SPACE & HABITAT ASSUMPTIONS

**Project:** North East Harpenden  
**Subject:** Open Space & Habitat Assumptions  
**Status:** For Information

**Ref:** BMD.24.0039  
**Date:** 03.07.2025  
**Rev:** -

To be read alongside the **BMD Landscape Framework Plan (REF: BMD.24.0039.DR.002)**

| Open Space Typology                                                                    | Habitat                                                | Percentage |
|----------------------------------------------------------------------------------------|--------------------------------------------------------|------------|
| <b>Productive Landscapes</b><br>(Allotments, Community Gardens &/or Orchards)          | Traditional Orchards                                   | 40%        |
|                                                                                        | Allotment & Community Gardens (Productive Landscape)   | 60%        |
| <b>Amenity Green Space</b><br>(includes general areas of site wide SuDS & green links) | Amenity grassland                                      | 20%        |
|                                                                                        | Introduced Shrub                                       | 10%        |
|                                                                                        | Hardstanding                                           | 10%        |
|                                                                                        | Scrub                                                  | 10%        |
|                                                                                        | Species rich wildflower grassland inc. scattered trees | 40%        |
|                                                                                        | Marshy Grassland (SuDS)                                | 5%         |
|                                                                                        | Broadleaved woodland                                   | 5%         |
| <b>Children's Play Areas- Local Equipped Area of Play (LEAP)</b>                       | Hardstanding                                           | 100%       |
| <b>Children's Play Areas Informal</b>                                                  | Amenity grassland                                      | 50%        |
|                                                                                        | Species rich wildflower grassland inc. scattered trees | 50%        |
| <b>Parks and Gardens</b><br><i>B. Neighbourhood Park</i>                               | Species rich wildflower grassland inc. scattered trees | 50%        |
|                                                                                        | Amenity grassland                                      | 20%        |
|                                                                                        | Scrub                                                  | 15%        |
|                                                                                        | Hardstanding                                           | 10%        |
|                                                                                        | Broadleaved Woodland                                   | 5%         |
| <b>Natural and semi-natural green space</b><br><i>A. Meadow Parkland</i>               | Species rich wildflower grassland inc. scattered trees | 50%        |
|                                                                                        | Scrub                                                  | 10%        |
|                                                                                        | Broadleaved Woodland                                   | 20%        |
|                                                                                        | Marshy Grassland (SuDS)                                | 5%         |
|                                                                                        | Amenity grassland                                      | 10%        |
|                                                                                        | Hardstanding                                           | 5%         |
| <b>Formal Outdoor Sport</b>                                                            | Hardstanding                                           | 10%        |
|                                                                                        | Amenity Grassland for Sport                            | 90%        |

To be read alongside the **BMD Landscape Framework Plan (REF: BMD.24.0039.DR.002)**

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