



Louise Duff

**Land to the Rear of 54 Hart Plain
Avenue, Waterloo**
Biodiversity Gain Plan

November 2024

Gradwell Group Notes

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Executive Summary

1. This Biodiversity Gain Plan incorporates the findings and recommendations of a habitat condition assessment survey undertaken at Land to the rear of 54 Hart Plain Avenue, Waterlooville, Hampshire (the site) Grid Reference SU6877810832. The assessment has been undertaken on behalf of the applicant, Louise Duff. The proposal development includes the construction of a three-bedroom family dwelling with associated parking and landscaping.
2. The habitats on site were mapped and assessed to determine their type and condition, establishing a baseline for Biodiversity Net Gain (BNG). Using the DEFRA Statutory Metric, a total of 4.63 habitat units and 0.32 hedgerow units were recorded. Following this assessment, calculations predict a loss of 0.45 habitat units e.g. -9.66%, and a net gain of 0.01 hedgerow units, or 3.92%. To deliver a net gain of 10% for the site in line with statutory law, off-site offsetting will be required, either through habitat creation/enhancement, or the purchase of habitat units from a relevant habitat bank.
3. Significant on-site gains will not be delivered as part of proposals and as such a Habitat Management and Monitoring Plan (HMMP) for the Site will not be required. Instead, an off-site strategy has been agreed upon, with the following actions outlined: If off-site habitat creation or enhancement is pursued, an HMMP will be necessary to facilitate tracking, monitoring, and auditing of the associated gains; If an appropriate habitat bank is identified within the private market and a unit sale is finalised, an HMMP will not be required. In this scenario, this BNG Gain Plan report will need to be updated to include the unit allocation details, subject to approval by the Local Planning Authority (LPA).
4. To ensure effective implementation, an audit report will be prepared to validate compliance with this strategy and to adhere to the BNG principles of best practice. This report will serve as a critical tool for assessing adherence to the established guidelines and ensuring that all relevant standards are met throughout the project lifecycle.

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1.0 Introduction

Purpose of this Report

- 1.1 Gradwell Group Ltd. was commissioned by Louise Duff (the client) to conduct on-site habitat condition assessments and to produce DEFRA Biodiversity Net Gain (BNG) metric calculations, along with an accompanying Biodiversity Gain Plan for the land located at Land to the rear of 54 Hart Plain Avenue, Waterloooville (the site). A map detailing the site location is included in Appendix 1.
- 1.2 The DEFRA Statutory Metric was employed to quantify habitat area, hedgerow, and watercourse units, which were mapped using QGIS based on the site survey and aerial satellite data. Proposed retained, enhanced, and created habitats were subsequently calculated according to the layout proposals available at the time of application submission, as detailed in Appendix 2.
- 1.3 This approach formed part of an iterative process, building on calculations conducted in earlier stages to establish the feasibility of BNG and to inform the development of proposals throughout the design process. These calculations were instrumental in determining the potential changes in BNG resulting from the development, as well as in identifying necessary measures to mitigate any ecological impacts on habitats.

Context

- 1.4 The Site was characterised by developed land; sealed surface, comprising the existing dwelling, and associated garden habitats. These habitats included areas of grassland, shrubs, mixed scrub, ruderal vegetation, and a pond. The Site was situated within town of Waterloooville, with residential and commercial development comprising the majority of the immediate surroundings.
- 1.5 Planning permission is being sought for the construction of a single three-bedroom dwelling with associated parking and landscaping. The proposed site layout for the scheme is presented in Appendix 2.

Objectives

- 1.6 The objectives of this report are threefold: first, to assess and quantify the pre-development biodiversity value, establishing a baseline expressed in biodiversity units. Secondly, to provide a structured framework that aligns the pre-development biodiversity value with subsequent planning applications relating to the approved development, enabling the calculation of changes in biodiversity units attributable to the proposed development. Lastly, the report aims to evaluate proposed mitigation measures, to the extent practicable, and identify enhancement opportunities where appropriate, in order to demonstrate compliance with requirements for achieving a measurable net gain in biodiversity.

Planning Policy and Legislation

- 1.7 This BNG assessment has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:

- UK Government's 25 Year Environmental Plan¹;
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services²;
- Biodiversity Net Gain³;
- National Planning Policy Framework (NPPF)⁴;
- The Environment Act 2021⁵
- National Policy Statement for National Networks (NPSNN)⁶;
- The Natural Environment and Rural Communities (NERC) Act⁷; and
- The Havant Borough Core Strategy⁸
- The Havant Borough Council Biodiversity Net Gain – Supplementary Information to Local List (consultation 2024)⁹.

1.8 There is no specific Local Policy that relates to BNG, though the Supplementary Information to Local List (consultation 2024) reiterates the information produced by Defra and The Environment Act and declares a mandatory 10% net gain for those development projects that are not exempt.

1.9 In line with the statutory requirement, the scheme aims to achieve a minimum of 10% BNG.

¹ Department for Environment, Food and Rural Affairs (DEFRA), 2018. *A Green Future: Our 25 Year Plan to Improve the Environment*. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Accessed 1 October 2024].

² Department for Environment, Food and Rural Affairs (DEFRA), 2011. *Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services*. [online] Available at: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-englands-wildlife-and-ecosystem-services> [Accessed 1 October 2024].

³ DEFRA, 2024. *Biodiversity Net Gain*. [online] Available at: <https://www.gov.uk/government/publications/biodiversity-net-gain> [Accessed 1 October 2024].

⁴ Department for Levelling Up, Housing and Communities (DLUHC), 2023. *National Planning Policy Framework*. [online] Available at: <https://www.gov.uk/guidance/national-planning-policy-framework> [Accessed 1 October 2024].

⁵ UK Government (2021) *Environment Act 2021*, London: The Stationery Office. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted> (Accessed: 1 October 2024).

⁶ Department for Transport. (2014). *National Policy Statement for National Networks (NPSNN)*. London: Department for Transport. Available at: <https://www.gov.uk/government/publications/national-policy-statement-for-national-networks> [Accessed 1 Oct. 2024].

⁷ HM Government, 2006. *The Natural Environment and Rural Communities Act*. London: HMSO.

⁸ Havant Borough Council (2011). *Havant Borough Council Core Strategy*. [online] Available at: <https://havant.gov.uk/planning-services/planning-policy/local-plan/core-strategy-and-allocations-plan-adopted-local-plan> [Accessed 26 Nov. 2024].

⁹ Havant Borough Council (2024) *Havant Borough Council Biodiversity Net Gain - Supplementary Information to Local List (consultation 2024)* [online] Available at: <https://www.havant.gov.uk/node/8555/biodiversity-net-gain> [Accessed 26 Nov. 2024].

2.0 Methodology

- 2.1** BNG is a development approach focused on enhancing biodiversity and ensuring that the site is left in a better ecological state after development. The primary objective is to achieve a positive net outcome for biodiversity by identifying opportunities for ecological enhancement. This process entails improving existing ecological resources and creating new habitats to compensate for any habitat losses incurred during development, ultimately promoting a net gain for biodiversity.

Data sources

- 2.2** The following data sources informed the BNG assessment:
- Habitat data collected by Gradwell Group, which includes habitat assessments and condition assessments in accordance with DEFRA's latest guidance.
 - Publicly available Open-Source datasets from Natural England, encompassing Habitats of Principal Importance (HoPI), ancient woodland (classed as irreplaceable habitat), and statutory designated sites for nature conservation.
 - Proposed Block Plan (DM Designs, drawing number L DUFF 03-A2).

BNG Assessment

- 2.3** All non-linear habitat parcels and linear hedgerow section data were entered into the Statutory Biodiversity Metric, an Excel-based tool, along with the necessary supplementary data to calculate the habitat units for the site's ecological baseline. This data establishes the numerical parameters used to quantify Biodiversity Units for both non-linear and linear habitats. Further details regarding these calculations are provided in subsequent sections.

Area / Length

- 2.4** The metric differentiates between linear habitats, such as watercourses and hedgerows, and non-linear habitats. Linear habitats are measured in kilometres (km), whereas non-linear habitats are quantified in hectares (ha). Measurements for both area and length were obtained using tools within QGIS, ensuring accurate and precise data for the assessment.

Distinctiveness

- 2.5** Each habitat is classified according to the UK Habitat Classification¹⁰ and is automatically assigned a distinctiveness score within the metric. This score reflects the habitat's characteristics, including species richness, its ability to support species that are rarely found in other habitats, and the rarity of the habitat itself.
- 2.6** It is essential to recognize that irreplaceable habitats, such as ancient woodlands, are not adequately captured by the metric and require separate evaluation. Although these habitats can be entered into the metric for an indicative assessment of their biodiversity value, any development affecting them must adhere to relevant national and local policies and legislation. Furthermore, it is advisable to seek bespoke ecological guidance to ensure appropriate management and protection of these

¹⁰ UK Habitat Classification Working Group. (2023) *UK Habitat Classification - Habitat Definitions Version 2.0*. Available at: <https://ukhab.org>

valuable habitats.

Condition

- 2.7** A condition assessment was conducted on 4 November 2024 by qualified ecologist and CIEEM member Leigh-Ann Barran BSc (Hons). The assessment followed the current protocols outlined in the DEFRA Statutory Biodiversity Metric. Each habitat's condition was evaluated separately, adhering to the methodologies specified in the Statutory Biodiversity Metric Guidance (DEFRA, 2024). This approach assigns condition scores based on specific criteria relevant to each habitat type. Habitats at the lower end of distinctiveness receive a standard condition score, with the following categorization: Good = 3; Moderate = 2; Poor = 1; and Not Applicable = 1.

Strategic Significance

- 2.8** The strategic significance of habitats is assessed based on their geographical context. Information used to determine a habitat's significance within the landscape may be sourced from local plans, biodiversity records, and National Character Areas. Strategic significance is categorized into three levels: High (score = 1.15), Medium (score = 1.1), and Low (score = 1).

Risk Factors

- 2.9** The metric incorporates two risk factor multipliers—"Time to Target Condition" and "Difficulty of Creation"—to account for the challenges associated with creating specific habitat types and achieving measurable biodiversity benefits. These multipliers reflect the varying timescales required for habitats to mature and the inherent uncertainties involved in successfully establishing particular habitats due to environmental and human factors.
- 2.10** For instance, the planned creation of woodland, which requires a longer duration to reach its target condition, or lowland fen, which poses significant challenges for successful creation, results in fewer Habitat Units compared to an existing habitat of the same type. The metric provides standard multipliers for each habitat class to facilitate these assessments.

Off-site Risk

- 2.11** In many cases, it is not feasible to fully offset biodiversity loss within the boundaries of the development site, necessitating off-site compensation. However, if the compensatory measures are implemented at a considerable distance from the original site, this results in a localized biodiversity deficit. To account for this spatial dislocation, a negative multiplier is applied to the off-site compensation, reflecting the reduced ecological value in the immediate vicinity of the development.

Application of the Metric

- 2.12** Site plans (Appendix 2), which illustrate the proposed development parcels, amenities, and infrastructure, were utilized to assess and quantify habitat loss and retention. These plans were entered into the metric to determine the number of non-linear habitat units and linear hedgerow units expected to be lost due to the development.
- 2.13** In addition, the plans were employed to calculate the extent of habitat types to be created. This information, along with relevant parameters, was input into the Site Habitat Creation section of the tool to generate post-intervention values for Habitat and Hedgerow Units.

- 2.14** Finally, a comparison between the baseline and post-intervention habitat and hedgerow unit figures enabled the calculation of the percentage net change in Biodiversity Units, thereby indicating whether the development results in a positive or negative net biodiversity change.

Assumptions and Limitations

- 2.15** The site survey was not carried out during the optimal period for UKHAB surveys (April to September). Some less conspicuous plant species, including invasive non-native species, may not have been detected during the survey due to their life cycles, which could have rendered them inconspicuous at the time of assessment. However, considering the prevalence of common habitats on the site, this is not expected to significantly affect the overall findings of the survey.
- 2.16** Detailed landscaping plans for the proposals were not available at the time of writing. However, given the small scale of the site and the nature of the proposals (i.e. predominantly private land), it is considered that the proposed block plan was sufficient to inform a robust assessment.
- 2.17** It should be noted that the DEFRA Statutory Biodiversity Metric does not explicitly account for individual species. Instead, it employs broad habitat categories as proxies for the biodiversity 'value' of the species communities within various habitats. Importantly, the metric does not affect legal obligations concerning protected species, which remain outside its scope.
- 2.18** In this report, the DEFRA Statutory Biodiversity Metric has been applied to demonstrate BNG. While it serves as a valuable tool for informing biodiversity-focused plans and decisions, its limitations must be acknowledged. To ensure that BNG is appropriately applied and successfully implemented, adherence to the Good Practice Principles for Development¹¹, is essential. These principles were developed by the Construction Industry Research and Information Association (CIRIA), the Chartered Institute for Ecology and Environmental Management (CIEEM), and the Institute of Environmental Management and Assessment (IEMA).
- 2.19** It is crucial to recognize that the metric does not supersede existing planning policies or legislation, including the mitigation hierarchy. The mitigation hierarchy mandates that efforts must first be made to avoid adverse impacts on biodiversity, followed by on-site mitigation of unavoidable impacts, and, only as a final recourse, off-site compensation for any residual impacts.
- 2.20** The metric's outputs are not absolute values but rather serve as proxies for the relative biodiversity value of a site before and after intervention. The reliability and accuracy of these outputs are contingent upon the quality of the input data. The goal should always be to replace habitats on a like-for-like basis or improve them, ensuring that one habitat is not replaced by another where feasible.
- 2.21** Moreover, while the metric is an effective tool for demonstrating biodiversity net gain, it does not eliminate the need for expert judgment by a suitably qualified ecologist. Ecological functionality must be a fundamental consideration in the assessment process, and the design of the site should align with the Good Practice Principles. Additionally, the metric should not be used as an excuse to overlook opportunities to enhance key species populations, even when they are not directly accounted for within the metric.
- 2.22** All habitat areas and lengths included within the BNG assessment have been measured manually

¹¹ Baker, J., Hoskin, R., & Butterworth, T. (2019) *Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide*. London: CIRIA.

using GIS based on habitat mapping from the site survey. As such, habitat areas are approximations only.

- 2.23** Where data provided by the client or external sources have been used, it has been assumed to be accurate. Gradwell Group cannot accept responsibility for any inaccuracies in third-party data. The conclusions and recommendations presented in this report are based on the assumption that all relevant information requested from these sources has been supplied accurately and comprehensively.

3.0 Baseline Conditions

3.1 A total of 12 habitat types and two hedgerow types on-site were identified, mapped, classified, and measured by area (in hectares) and by length (in kilometres) respectively. The calculations for these habitat types are detailed in a separate Biodiversity Metric workbook. The baseline habitats present on the site are outlined in Table 1, and the corresponding UK Habitat Classification (UKHabs) map is provided in Appendix 3, with photos provided in Appendix 4.

Table 1. Baseline habitats within the Site.

UK Habitat Classification	Description	Condition
Modified grassland	Grassland associated with garden of main house. Between 6-8 species per m ² , generally uniform sward. No significant encroaching scrub, bracken or damage recorded and cover of bare ground between 1% and 10%. No invasive species recorded.	Good
Other neutral grassland	Two parcels associated with the rear of the garden in proximity of the existing shed building. Generally good condition with varied sward, minimal bracken and scrub encroachment, and more than 10 species recorded per m ² . Secondary parcel recorded as being encroached and encumbered by scrub and common nettle <i>Urtica dioica</i> growth.	Good, poor
Bramble scrub	Bramble <i>Rubus fruticosus</i> agg. growth in the north-east corner	Condition assessment N/A
Mixed scrub	Scrub comprising multiple species, none of which comprised more than 75% of the cover. No invasive species recorded.	Poor
Ponds (Non-priority habitat)	A single pond surrounded by introduced shrub at the back of the garden. Water quality was fair with low turbidity. Pond appeared natural garden pond e.g. no artificial connections or pipework. Fish absent and not excessively shaded by tree cover.	Moderate
Ruderal/ephemeral	Various ruderal parcels across the site, predominantly in the north, most parcels with little varied structure.	Good, moderate
Artificial unvegetated, unsealed surface	Decking associated with the existing house	N/A Other
Bare ground	Bare ground with little vegetation to speak of save for leaf litter from overhead trees	Moderate
Built linear features	Existing hardstanding access for vehicles	N/A Other
Developed land; sealed surface	Comprising buildings on site including main house and sheds	N/A Other
Ground level planters	Minor planters in garden with various ornamental species	Condition assessment N/A
Urban tree	Nine large individual trees recorded	Good
Native hedgerow	Hedgerow located to the west of the existing house comprising laurel <i>Prunus laurocerasus</i> , privet <i>Ligustrum vulagre</i> , box <i>Buxus sempervirens</i> , bramble, and holly <i>Ilex aquifolium</i>	Good
Non-native and ornamental hedgerow	Ornamental species along the eastern boundary of the site	Poor

3.2 The baseline habitats within the Site were valued at a total of 4.63 habitat units. Hedgerows were valued at 0.32 units. A detailed breakdown of the habitat units is provided in the accompanying Biodiversity Metric, which can be found in Appendix 5.

4.0 BNG Good Practice Principles for Development

4.1 The DEFRA Metric is designed as a tool to guide BNG assessments, supporting informed planning and decision-making. However, it is essential to recognize the tool's limitations and ensure assessments are conducted in alignment with established principles and rules. These key principles, outlined in Biodiversity Net Gain Good Practice Principles for Developments; A Practical Guide¹², are critical to the proper application of BNG. Table 2 below summarizes these principles and provides a detailed justification for how each was addressed during this assessment, ensuring adherence to best practices throughout the process.

Table 2. BNG Best Practice Principles for Development and Justification.

Principle	Description	Justification principal application
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.	Given the size of the site and scope of the works, impacts to the habitats present will be unavoidable. The development will result in most baseline habitats being lost, and given the scope of the works, significant on-site habitat creation/enhancement is not feasible. The strategy to deliver net gain for the site will therefore need to centre on off-site offsetting. Impacts to habitats of higher value within the site are sought to be avoided, including retention of features like large trees and hedgerows.
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.	There are considered to be no irreplaceable habitats within or adjacent to the site.
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, and share the benefits fairly among stakeholders.	Consultation with stakeholders has been a key aspect of the design process and will continue throughout the current application phase.
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.	As per mandatory BNG, purchase of any off-site habitat units will be registered on the Natural England Gain Site Register and will be required to have a risk management and remedial measures policy within their Habitat Maintenance and Monitoring Plan. As such the risks associated with delivering net gain for the site are considered negligible.
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.	The mitigation hierarchy has been applied and given the size of the site; off-site measures will be required to deliver a measurable net gain.
6. 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,	The size and proposals for the site make it difficult to provide gains on site and as such off-site measures will be adopted to deliver a gain. In doing so other ecological receptors will be taken into consideration to achieve the best outcomes.

¹² Baker, J., Hoskin, R., & Butterworth, T. (2019) *Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide*. London: CIRIA.

Principle	Description	Justification principal application
	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).	Off-site off-setting will be pursued to address the loss of on-site units and deliver a net gain. Given this, all purchased units will be specifically for net gain and not be related to any other mitigation/compensation requirements thereby satisfying the condition of additionality.
8. Create a Net Gain legacy	Ensure Net Gain delivers long-term benefits by: • engaging stakeholders to collaboratively agree on practical solutions that secure its permanence • planning for adaptive management with dedicated long-term funding, designing biodiversity strategies that are resilient to external factors such as climate change • mitigating risks from conflicting land uses • preventing the displacement of harmful activities to other areas, and • promoting local-level management of Net Gain activities.	The site will make measurable contributions to biodiversity through financial contribution. These off-site measures will have a legacy that will be secured over 30 years.
9. Optimise sustainability	Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	Sustainability will be borne in mind when delivering the on-site works.
10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	The commitment to delivering BNG is formalised within this Gain Plan and purchase of off-site units is expected to be secured by the LPA through an appropriately worded compliance condition in any future planning consent.

5.0 Proposed Design

Impact Assessment

- 5.1** The DEFRA Statutory Metric was applied using the provided data to assess the post-development biodiversity net gain calculations. The results indicate that 0.45 habitat units will be lost, reflecting the loss of the majority of natural habitats on site to accommodate the new dwelling and associated garden and access. The existing house and associated garden will be retained in line with the proposals. The individual trees recorded are not scheduled for removal as part of the proposals and will be retained on site.

Habitat Creation/Enhancement

- 5.2** Proposed habitats on-site will be under the private ownership of the homeowner, and as such significant on-site gains are not proposed. Proposed habitats will comprise developed land, sealed surface, built linear features, and vegetated garden (Appendix 6). An ornamental hedgerow will be planted, totalling c.13 m. All proposed habitats have a fixed score within the metric.
- 5.3** The total post-intervention value of the site is predicted to be 4.18 habitat units and 0.33 hedgerow units.

6.0 BNG Metric

6.1 With the incorporation of the measurements detailed in the previous section, the metric calculation currently indicates a net change of -0.45 units, representing a net loss of -9.66%. There is predicted to be a net gain of 0.01 hedgerow units, or 3.92% The DEFRA Statutory Metric can be found in Appendix 5, and a summary of the findings is presented in

6.2 Table 3 below.

Table 3. Summary of the BNG results.

On-site baseline	Habitat units	4.63
	Hedgerow units	0.32
	Watercourse units	0.00
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	4.18
	Hedgerow units	0.33
	Watercourse units	0.00
On-site net change (units & percentage)	Habitat units	-0.45
	Hedgerow units	0.01
	Watercourse units	0.00
Off-site baseline	Habitat units	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Off-site net change (units & percentage)	Habitat units	0.00
	Hedgerow units	0.00
	Watercourse units	0.00
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.45
	Hedgerow units	0.01
	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 (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.45
	Hedgerow units	0.01
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-9.66%
	Hedgerow units	3.92%
	Watercourse units	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

6.3 It is important to note that the Trading Rules have not been satisfied for the proposals, resulting in a deficit of 0.23 other neutral grassland, 0.08 scrub, and 0.01 pond units, all of which are medium distinctiveness habitats, which specific offsetting with like-for-like or better. The remaining deficit of 0.13 units comprise low distinctiveness habitats, which can be offset with most natural habitat types. As a crucial component of achieving BNG, it is essential that the trading rules be met to successfully deliver BNG.

6.4 Given the predicted losses, an off-site strategy will be required to deliver BNG for the site.

Off-site strategy

- 6.5** Given the size of the site, it will not be feasible to accommodate measures on-site that would result in a biodiversity net gain. As such, an off-site strategy will be pursued to deliver the 0.91 units (0.23 of which are required to be other neutral grassland, 0.08 scrub, and 0.01 pond) to offset the deficit and deliver a 10% net gain for habitats, and an additional 0.02 hedgerow units will be required to deliver a 10% gain for hedgerows.
- 6.6** This can either be accomplished via habitat creation/enhancement on an off-site parcel of land, or through financial offsetting e.g. purchasing units from a relevant habitat bank. It is considered that through either one or both of these methods, the on-site deficit can be effectively offset and deliver a net gain for the site.

7.0 Implementation, Construction, Management, and Monitoring Plans

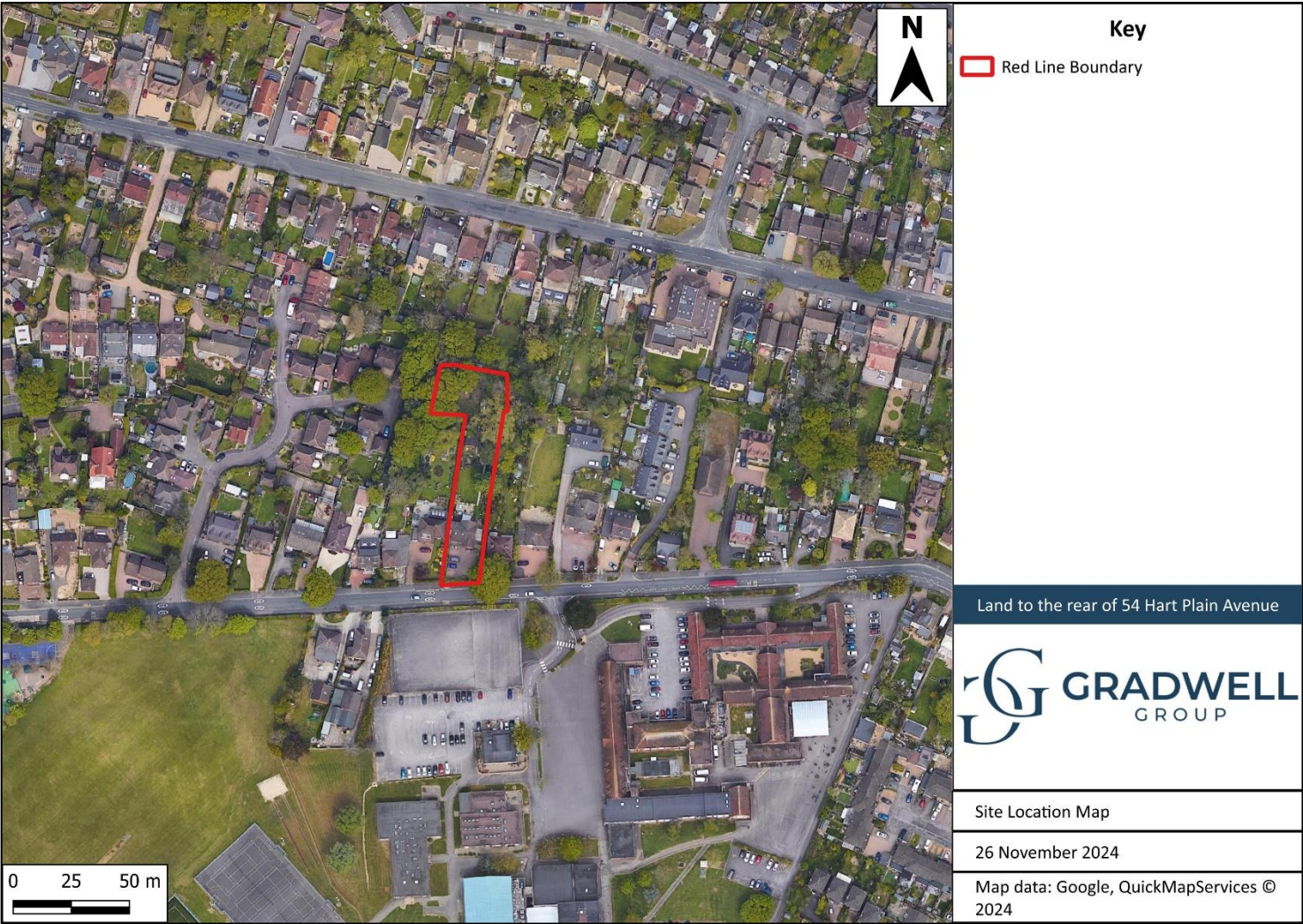
- 7.1** Given that no significant on-site enhancements are proposed in line with proposals, as per best practice a Habitat Management and Monitoring Plan (HMMP) will not be required.
- 7.2** Once an offsite strategy has been agreed, the following actions will occur; if offsite habitat creation/enhancement is pursued, an HMMP will be required to track, monitor and audit those gains. If an appropriate habitat bank is identified within the private market and a unit sale is finalized, an HMMP will not be required. In this scenario, this BNG Gain Plan report will need to be updated to include the unit allocation details, subject to approval by the LPA.

8.0 Conclusions

- 8.1 The DEFRA metric has demonstrated that the proposed development at Land to the rear of 54 Hart Plain Avenue cannot deliver a net gain in line with current proposals and does not fulfil the trading rules for other neutral grassland, scrub, and pond units.
- 8.2 Off-site measures will therefore be required; though a strategy has not yet been agreed, avenues involving offsite habitat creation/enhancement and/or purchasing units from a suitable habitat bank are considered feasible and realistic to deliver a 10% net gain for the site.
- 8.3 Based on the plans, all necessary measures have been considered in accordance with the BNG Good Practice Principles for Development¹³. Consequently, a compliance planning condition can be attached to any future planning permission for the development.
- 8.4 It is anticipated that if these plans are effectively implemented, the site will be able to deliver a significant BNG and adhere to both local and national planning policies.

¹³ CIEEM, IEMA & CIRIA (2021) *Biodiversity Net Gain: Good Practice Principles for Development*. [Online] Available at: <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf> [Accessed 2 Oct. 2024].

Appendix 1: Site Location Plan



Land to the rear of 54 Hart Plain Avenue, Waterloo – Biodiversity Gain Plan

Land to the rear of 54 Hart Plain Avenue, Waterloooville – Biodiversity Gain Plan



Appendix 3: Baseline Habitats Plan



Land to the rear of 54 Hart Plain Avenue, Waterlooville – Biodiversity Gain Plan

Appendix 4: Site Photographs



Photo 1. Area of other neutral grassland becoming encroached by nettles



Photo 2. Bramble and mixed scrub.



Photo 3. Existing car park area



Photo 4. Existing garden set to be partially retained associated with the existing dwelling.



Photo 5. Existing pond

Appendix 5: BNG Statutory Metric (Appended Separately)

Appendix 6: Condition Assessment Forms

Habitat Parcel as referenced within metric	Corresponding Condition Sheet	UKHabs Type	Condition Criteria													Score
			1	2	3	4	5	6	7	8	9	10	11	12	13	
1	Grassland (low)	Modified grassland	P	F	P	P	P	P	P							Good
2	Grassland (medium, high, very high)	Other neutral grassland	P	P	P	P	P	P								Good
3	Grassland (medium, high, very high)	Other neutral grassland	F	F	F	P	F	F								Poor
5	Scrub	Mixed scrub	P	F	P	F	F									Poor
6	Pond	Ponds (non-priority)	P	F	F	P	P	P	P	P	P					Moderate
7	Urban	Ruderal/ephemeral	P	P	P											Good
8	Urban	Ruderal/ephemeral	F	P	P											Moderate
9	Urban	Ruderal/ephemeral	F	F	P											Poor
11	Urban	Bare ground	P	P	F											Moderate
17	Individual trees	Urban tree	P	P	P	P	P	P								Good
2, 4 within hedgerow tab	Hedgerow	Native hedgerow	P	P	P	P	F	P	P	P						Good

Appendix 7: Proposed Habitats Plan



Land to the rear of 54 Hart Plain Avenue, Waterloo – Biodiversity Gain Plan