



Brighter strategies
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Client: Portsmouth City Council
Project: Dunsbury Park 600-601
Report: Biodiversity Net Gain Assessment

QUALITY ASSURANCE

Issue/Revision:	Draft	Final
Date:	March 2026	March 2026
Comments:		
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File Reference:	553134arMar26FV01_BNGA.d ocx	553134arMar26FV01_BNGA.d ocx

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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd (Greengage) was commissioned by Portsmouth City Council in March 2026 to undertake a Biodiversity Net Gain Assessment (BNGA), using the Statutory Biodiversity Metric (SBM), for an area of land known as Plot 600-601 of the Dunsbury Park Development in Portsmouth, hereafter referred to as 'the site'.

The BNGA aims to quantify the predicted change in biodiversity value of the site in light of the proposed development to assess compliance against national and local planning policy and against the BNG mandate set out in the Environment Act 2021, which states that all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% biodiversity net gain.

The site extends to 3.14 hectares (ha) and comprised modified grassland, a single English Oak tree, and bramble scrub, as identified from a site walkover undertaken on 22nd April 2025, alongside data received from a desk study undertaken as part of a PEA. report (551772ImAug25FV01_PEA).

Proposed habitat creation includes 0.0964 ha of modified grassland, 0.0858 ha of other neutral grassland, 0.087ha of mixed scrub, 2.819ha of developed land; sealed surface, as well as the enhancement of 0.0471ha of modified grassland to other neutral grassland.

The locations, extents, conditions and habitat parcel reference numbers of the pre-development (baseline) and post development habitats are mapped in Figure A.1 and Figure B.1. The habitat values are split into three categories: area-based 'Habitat Units' (HU), linear-based 'Hedgerow Units' (HeU) and aquatic linear-based 'Watercourse Units' (WU) respectively, where applicable to the site.

The pre-development baseline values are 6.98 HU and 0.06 HeU.

The 10% BNG targets are therefore 7.678 for HU, and 0.066 for HeU ideally delivered fully on-site.

The post-development design proposals are predicted to deliver 1.83 HU. This is a net loss of 5.15HU (equivalent to - 73.73 % for HU).

The post-development design proposals are predicted to deliver 0 HeU and not retain the existing length of native hedgerow. This is a complete net loss.

The design proposals do meet the BNG Trading Rules for habitat types/distinctiveness levels.

The onsite areas of biodiversity value are not considered to be significant due to the small scale of habitat creation and types of habitats that will be present post development i.e. habitats of low value/significance which do not require condition assessments. Therefore, detail relating to the proposed biodiversity compensation and enhancement actions in relation to habitat creation and management can be provided within a Landscape and Ecological Management Plan (LEMP) for the site which could be secured through planning condition. Should these recommendations be adhered to and so long as 10% BNG is delivered, the proposals stand to be compliant with legislation and current planning policy.

Offsite habitat creation is required in order to meet legislative compliance and deliver a 10% net gain for HU and HeU. It is understood that a receptor site within the ownership of Portsmouth City Council is being sought. Upon receiving planning permission, the submission of a Biodiversity Gain Plan (BGP) to the LPA will be required. This BGP must include details of the proposed off-site BNG compensation, including the Biodiversity Gain Site Register Reference.

Alongside the BNGA, qualitative ecological enhancement recommendations have also been provided which contribute to further increasing the ecological value of the scheme. Refer to the PEA report for details.

2.0 INTRODUCTION

Greengage Environmental Limited (Greengage) was commissioned by Portsmouth City Council in March 2026 to undertake a Biodiversity Net Gain Assessment (BNGA), using the Statutory Biodiversity Metric (SBM), for an area of land known as Plot 600-601 of the Dunsbury Park Development in Portsmouth, hereafter referred to as 'the site'.

Under the Environment Act 2021, developments are mandated to achieve a 10% biodiversity net gain (BNG), and they may also be required to under local policy. Most Local Planning Authorities (LPA) require a 10% net gain delivered against a site's pre-development (baseline) value. This is determined through assessing the condition of pre-development habitats on the site i.e. calculating the baseline at the BNGA Baseline stage, followed by comparison against the anticipated changes in biodiversity value based on the development proposals.

The purpose of this BNGA which has been completed for the Design Stage is to compare the predicted post development biodiversity value of the site against the pre-development (baseline) value, to identify if the 10% BNG target will be reached, or if it can be reached through implementation of 'suggested changes' to the site/landscape design. Where it is not feasible to achieve the required 10% gain onsite then off-site compensation will be required.

This BNGA has been undertaken in March 2026. Any further changes to the design will impact upon the BNG score and the SBM calculations will need to be updated to reflect such changes. This also carries forward throughout the entire lifetime of the project, including after planning permission has been granted, in and throughout the construction phase. BNG aims to give an accurate reflection of the changes happening on-site.

2.1 SITE DESCRIPTION

The site extends to approximately 3.14 hectares (ha) and is centred on Ordnance Survey National Grid Reference (OS NGR): SU701094, OS Co-ordinates 470170, 109474.

The site comprised an unmanaged field (modified grassland) with an area of bramble scrub surrounding an oak tree.

The site is located approximately 4km from the south coast at Bridge Lake, 2.5km north-west of the centre of Havant and approximately 320m east of the main carriageway of the A3(M). It is located within a field within the consented Dunsbury Park development, between the conurbations of Waterlooville and Leigh Park.

The site is situated in a mixed context, with residential developments, industrial developments and an extensive semi-natural habitat network all present in the close vicinity. The semi-natural habitat comprises woodland, scrub, grassland and parkland which are present in the immediate vicinity to the north, east and south of the site. The baseline habitat map can be found in Appendix A.

2.2 PROPOSED DEVELOPMENT

The proposed development proposes to deliver new industrial units with associated parking, service yards, and landscaping.

The 'Proposed Site Layout' produced by UMC Architects, dated 19/08/2025, has been used as the basis for information regarding the proposed post-development habitats and has been used to inform the comparison against the baseline values. A map of the proposed habitats is contained in

Appendix B, and a copy of the original 'Proposed Site Layout' is included in Appendix C. The proposed landscaping will consist of

3.0 METHODOLOGY

3.1 PRE-DEVELOPMENT (BASELINE)

Habitat Data

A Preliminary Ecological Appraisal (PEA) [Report Ref: 551772ImAug25FV01_PEA] has been undertaken by Greengage in accordance with guidance in the UK Habitat Classification System (UKHab)¹ and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal², in accordance with British Standard (BS) 42020: 2013: Biodiversity³. The PEA included a site walkover which identified and mapped the extent and distribution of different habitat types on-site according to the standard UKHab classification methodology, i.e. using Primary Codes, and supplemented with Secondary Codes. A habitat map was produced to illustrate the results, which is provided as Appendix A.

During the PEA, the habitats were also subject to Condition Assessments, where relevant, in accordance with the SBM Condition Assessments. (See 'Habitat Condition' below).

Statutory Biodiversity Metric Calculation Tool

This BNGA uses the government mandated methodology within the 'Statutory Biodiversity Metric User Guide' (SBM User Guide), distributed by Department for Food Environment and Rural Affairs (Defra), February 2024⁴.

BNG uses habitat type and condition as a proxy for overall biodiversity value, measured in Biodiversity Units (BU) which are calculated using the SBM. The BU are separated into area-based Habitat Units (HU), linear-based Hedgerow Units (HeU) and aquatic linear-based Watercourse Units (WU), as applicable to a site, respectively. For this site, HU and HeU are applicable.

The following information on each habitat type are the required SBM inputs:

- Type;
- Area/length;
- Condition; and
- Strategic significance.

The areas of each habitat parcel are measured, with each habitat parcel assigned a 'Distinctiveness', 'Condition' and 'Strategic Significance' score. Distinctiveness is a default score for the habitat classification, representing its inherent biodiversity value, whereas condition refers to the state each habitat parcel is in relative to a predetermined set of criteria outlined in the SBM User Guide.

Strategic significance draws upon priorities and objectives within local plans and strategies, and is measured by providing habitats with a score from low to high as follows:

- Low - "area / compensation not in local strategy";
- Medium - "location ecologically desirable but not in local strategy"; and
- High - "formally identified in local strategy".

To calculate the pre-development (baseline) BU value, habitat data collected during the PEA has been used. A BNGA habitat map has been created based on the data collected in the field using

Coreo⁵ software. The area extents for each habitat type shown in the BNGA habitat map were then measured using Quantum Geographical Information System (QGIS) software. See Appendix A and Appendix B.

To calculate the HU associated with trees on-site, stem diameters of each tree were used to assign each tree a rating of 'small', 'medium', 'large' or 'Very large', in line with the User Guide. The rating corresponds to an area value to be used.

Distinctiveness values were automatically calculated for the site and habitat conditions were assessed both in the field and retrospectively using site photos.

Type and Area/Length

Habitat types documented in the PEA use UKHab classifications and primary codes supplemented by secondary codes, where applicable. The SBM uses a classification system based mainly on the UKHab Classification System¹ but with input also from other systems including the Water Framework Directive (WFD) Lakes Typology⁶, the European Nature Information System (EUNIS) habitat definitions⁷, Habitats Directive Annex 1 definitions⁸.

As such, UKHab classifications used in the PEA do not always translate directly into the SBM habitat types that are available for selection within the pre-set drop-down menus. Occasionally UK Hab secondary codes provide the key information to be able to allocate the SBM 'best fit' selection for the UKHab habitat type. No habitat conversions were needed for the site.

A habitat parcel reference has been applied to each area-based, hedgerow-based and/or watercourse-based habitat type on the site, which is cross-referenced within the SBM calculation tool and Figure A.1.

For individual trees present on the site, the area extent attributed to individual trees has been calculated using the 'Tree helper' within the SBM calculation tool. This is based upon using Diameter at Breast Height (DBH) in centimetres (cm). In accordance with the SBM User Guide, based on 'Diameter at breast height (centimetres (cm))', tree sizes have been recorded as follows;

- Small is less than 30 cm diameter,
- Medium is greater than 30 cm, to less than or equal to, 60 cm;
- Large is greater than 60 cm, to less than or equal to 90 cm; and,
- Extra large is greater than 90 cm.

Each tree has been given a habitat parcel number and referred to within the 'Assessors' comment box within the SBM.

Habitat Condition

Where applicable, habitats were subject to a condition assessment in accordance with the SBM Condition Assessments. Formalised copies of the Condition Assessments for the Baseline habitats are provided in Appendix D.

Habitats must be quantified using criteria set out by the SBM Condition Assessments to determine their relative condition.

The condition of a habitat is a measure of the biological 'working-order' of a habitat type judged against the perceived ecological optimum state for that particular habitat.

The condition of each habitat type was assessed against pre-set criteria and categorised as either 'Good', 'Fairly Good', 'Moderate', 'Fairly Poor' or 'Poor'. Where a habitat type varies in condition within the site this was recorded and mapped.

Strategic Significance

The SBM calculation tool accounts for whether the habitat is situated in an area locally identified as significant for nature.

Data on areas and habitats locally identified as significant for nature were obtained from the following:

- Multi-Agency Geographical Information for the Countryside (MAGIC) website for mapped statutory designated sites;⁹
- The Hampshire Biodiversity Information Centre (HBIC) was consulted in July 2025 during the PEA for records of statutory and non-statutory designated sites for nature conservation within and adjacent to the site;
- Habitats listed within the Local Nature Recovery Strategy (LNRS) for Hampshire;¹⁰
- The Core Strategy (2011);¹¹

Using the SBM calculation tool, habitat values have been calculated based on whether they occur commonly or whether they are rare, their area (ha) (or length (km) for linear features such as hedgerows), condition and importance within the local area, usually identified from local relevant planning policies or documents.

3.2 POST- DEVELOPMENT (PROPOSED)

To calculate the post-development BU value, the area extents for each habitat type were measured based on the 'Proposed Site Layout', using Quantum Geographical Information System (QGIS) software. See Appendix C.

Habitat types were inferred from the 'Proposed Site Layout' and a discussion with the client. Where justification for habitat types is required, this has been included in Section 4.0.

Targeted condition scores were assigned by Greengage, using the SBM habitat condition criteria, whilst considering the likely future use of each area on the 'Proposed Site Layout' and what was considered feasible to reach.

- Strategic significance of post-development habitats has been assigned as 'Location ecologically desirable but not in local strategy' based on the information above.

In accordance with the BNG Trading Rules, changes in broader habitat types (for example, 'Urban', 'Woodland' and 'Grassland' habitats) are also tracked, and trading habitats is discouraged unless specifically targeted within a local strategy. Trading down of habitats is not permitted.

The definition of 'significant enhancements', in accordance with government guidance (www.gov.uk) is 'areas of habitat enhancement which contribute significantly to the proposed development's BNG, relative to the biodiversity value before development'.

Retention of existing habitat does not count as an on-site enhancement.

What counts as a significant enhancement will vary depending on the scale of development and existing habitat, but these would normally be:

- habitats of medium or higher distinctiveness in the biodiversity metric;
- habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development;
- habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development;
- areas of habitat creation or enhancement which are significant in area relative to the size of the development;
- enhancements to habitat condition, for example from poor or moderate to good.

3.3 COMPETENCES

In accordance with 'British Standard: 8683 (BS:8683) Process for designing and implementing biodiversity net gain – Specification', this BNGA and all associated condition assessments have been completed by competent, suitability trained and qualified ecologists.

Andrew Robinson, Consultant, has a BSc (Hons) in Geography and Natural Hazards and a MSc Global Urban Development and Planning degree. Andrew is a practitioner member of ISEP and specialises in GIS, ecosystem service assessments and green infrastructure design.

Daniel Perlaki, Senior Consultant, has an undergraduate degree in Ecology (BSc Hons), a Master's degree in Conservation Science and Policy and is a Graduate member of CIEEM. Dan has over 8 years' experience in ecology survey and consultancy.

Rosie Lodge, Principal Consultant, has an undergraduate degree in Biological Sciences (BSc Hons), specialising in ecology and a Master's degree in Environmental Sustainability, specialising in climate change and conservation. She is a full member of the Institution of Environmental Sciences (IES) with over 15 years' experience in sustainability and ecological consultancy and currently focuses on green infrastructure and ecosystem service provision for the built environment.

This report was written by Andrew Robinson, reviewed by Dan Perlaki and verified by Rosie Lodge who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased, and exaggerated statements.

3.4 ASSUMPTIONS

Statutory Biodiversity Metric Calculation Tool

Strategic significance for the baseline has been determined to be 'Location ecologically desirable but not in local strategy' for all habitats following a review of the Core Strategy (2011).¹¹

The condition of the habitats, either for the baseline or that a habitat is considered to be able reach post-development, has been assessed using information within the SBM User Guide and based upon the ecologist's judgement of the habitats/input from the landscape architect.

Where there was no suitable UKHab or SBM habitat classification for a habitat, a 'best fit' alternative has been used with an explanation given to justify its use.

Note the sum of the values shown in columns within the Biodiversity Units tables may differ from the total units stated. This is due to rounding and is not considered significant. The totals stated reflect those calculated within the SBM calculation tool, based on the SBM User Guide.

4.0 RESULTS

4.1 PRE-DEVELOPMENT (BASELINE)

Desk Study

Statutory Designated Sites

The desk study had identified no statutory designated sites within 2km of the site.

Non-statutory Designated Sites and/or Local Nature Reserves

The desk study had identified forty non-statutory designated sites within 2km of the site; comprising various Sites of Importance for Nature Conservation (SINCs). The nearest being Dunsbury Hill Wood which is situated 0.34km northeast of the site. For best practice, it is acknowledged here that measures to protect these designated sites from impacts by any future development should be undertaken and are fully detailed in the PEA.

In addition to the above, a review of MAGIC found that two European Protected Species Mitigation (EPSM) Licences for bats, three for hazel dormouse and one for GCN lay within 2km of the site boundary. The closest EPSM Licence for each species was 1.48km, 0.33km and 1.91km respectively.

Additionally, the following UK BAP priority habitats/species were present within 2km of the site boundary:

- One hundred and ten parcels of deciduous woodland, with the closest parcel 0.09km east of the site;
- Thirty parcels of ancient woodland comprising ANSW and ancient replanted woodland, the closest parcel 0.30km northeast;
- Three parcels of lowland dry acid grassland, 0.96km north;
- One parcel of wood pasture and parkland, 1.18km east;
- Two parcels of coastal and floodplain grazing marsh, 1.23km southeast of the site.
- Three parcels of traditional orchards, the closest being 1.30km west; and
- Two parcels of lowland meadows, 1.52km southwest.

Additionally, a review of the Hampshire Local Biodiversity Action Plan Habitat Action Plans has identified the following to be of relevance to the site:

- Ancient semi-natural woodland HAP; and
- Ancient hedgerows HAP.

Statutory Biodiversity Metric Calculation Tool

Using the SBM calculation tool the baseline biodiversity value of the site has been identified to be 6.98 HU and 0.06 HeU.

A breakdown of the baseline calculations for HU is provided in Table 4.1 below:

Table 4.1 Baseline Habitat Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Grassland	Modified grassland	3.113	Low	Poor	6.85
Heathland and scrub	Bramble scrub	0.0225	Medium	Condition assessment N/A	0.10
Individual trees	Urban tree	0.0041	Medium	Moderate	0.04
*Individual trees are not included in the total site area to avoid double counting				TOTAL	6.98

A breakdown of the baseline calculations for HeU is provided in Table 4.1 below:

Table 4.2 Baseline Hedgerow Units

Broad Habitat	Habitat Type	Length (Km)	Distinctiveness	Condition	Hedgerow Units
Hedgerow	Native hedgerow	0.013	Low	Moderate	0.06
				TOTAL	0.06

The above tables have been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- The pre-development (baseline) habitats did not appear to have been subject to degradation prior to the condition assessment
- In accordance with the SBM User Guide, 'Bramble Scrub' does not have a condition assessment.
- 'Modified grassland' has a condition score of 'Poor' as the habitat parcel failed Criterion A, which requires species richness to be >6 species per sqm. Criterion A is a requirement for the habitat to reach medium or high distinctiveness. The parcel also fails criterion B as it has a uniform sward height and criterion D as it has >5% of its area showing physical damage. However, the parcel does pass Criterion C as scrub does not encroach upon 20% of the grassland area, criterion E as bare ground is present across between 1-10% of the habitat, bracken Pteridium aquilinum cover is <20% and there is an absence of invasive non-native species (INNS).
- 'Urban tree' has been assigned a condition score of 'Moderate'. It passes criterion A as it is a native species (Quercus robur). As an individual tree it automatically passed criterion B, which asks whether the tree canopy is predominantly continuous. The tree also passed criterion C which asks whether the tree is mature, as well as criterion F which assesses whether 20% of the tree canopy cover is oversailing vegetation. The tree did however fail criteria D and E. D concerned whether there was any evidence of adverse impact on tree health by human

activities (such as vandalism, herbicide or detrimental agricultural activity). It was reported on the site visit that the tree exhibits adverse health impacts and has far below the 75% expect canopy size. With regards to criterion E, this concerns whether the tree contains any natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark. The tree failed to pass this criterion due to the bramble obstruction which prevented the surveyor from fully assessing niche presence.

- 'Native hedgerow' habitat has been assigned a condition score of 'Moderate' due to only failing both attributes in one criterion group C. The hedgerows did not have undisturbed ground at their base and showed signs of nutrient enrichment. These hedgerows did not have an average width of 1.5m along their length, showed signs of damaging activities, and did not have more than one age class of trees.

4.2 POST-DEVELOPMENT (PROPOSED)

Using the SBM calculation tool, the proposed development is predicted to deliver 1.83 HU and 0.00 HeU respectively, as shown in Tables 4.3 and 4.4 below.

Table 4.3 Post-Development Habitat Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Created					
Grassland	Modified grassland	0.0964	Low	Poor	0.20
Grassland	Other neutral grassland	0.0858	Medium	Moderate	0.63
Heathland and shrub	Mixed scrub	0.0870	Medium	Moderate	0.64
Urban	Developed land; sealed surface	2.8192	V.Low	N/A - Other	0.00
Enhanced					
Grassland	From Modified grassland to Other neutral grassland	0.0471	Low-Medium	Moderate	0.32
Retained					
Individual tree	Urban tree	0.0041	Medium	Moderate	0.04
				TOTAL	1.83

Based on the 'Proposed Site Layout' drawing, the proposed development is predicted to provide 0.00 HeU due to removal of the only hedgerows on-site.

The above table has been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- 'Developed land; sealed surface' relates to all areas of hardstanding, building and impermeable surfaces within the proposed development design. The habitat has a pre-set condition within the SBM and does not contribute any biodiversity units to the calculation.
- 'Mixed scrub' was assigned 'Moderate' condition, this is because it will feature a minimum of three native woody shrub species such as hawthorn *Crataegus monogyna*, elder *Sambucus nigra*, blackthorn *Prunus spinosa* and willow *Salix spp.*, so passing criterion A which asks if 80% of the scrub will be native, whether it will contain at least three native woody species and whether no single species will comprise more than 75% of the cover. It will feature a diverse age profile of shrubs, including seedlings, saplings, young shrubs and mature shrubs through planting a diverse age mix and allowing natural regeneration, this satisfies criterion B, which asks if seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are all present. Criterion C is satisfied as there will be an absence of INNS, as INNS will be removed if recorded. The mixed scrub will fail criterion D which asks if the habitat has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat. It will also fail criterion E, which asks if there are clearings, glades or rides present within the scrub, providing sheltered edges. This is owing to its size, as it will not provide clearings, glades or rides, and it will not have a well-developed edge transitioning into tall grassland habitat.
- Other neutral grassland will be created at the site entrance and will be categorised as 'Moderate'. The habitat will pass criterion A, which asks whether it is a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type. The habitat will pass criterion B which asks whether sward height is varied. The habitat will also pass criterion D, which asks whether cover of bracken *Pteridium aquilinum* is less than 20% and cover of scrub. The habitat will also pass criterion E which asks if combined cover of species indicative of suboptimal condition accounts for less than 5% of the total area. The habitat will fail criterion C, which asks if the cover of bare ground will be between 1 % and 5%, this is due to the predicted heavy vehicle use. The habitat will also fail criterion F, which asks whether There are 10 or more vascular plant species per m2 present.
- Modified grassland created is assumed to achieve poor condition. This is due to the areas being unlikely to achieve the required species richness A. It will also fail criterion B (the sward height it varied), criterion D (that there is physical damage in less than 5% of the total grassland area), and criterion E (that cover of bare ground is between 1% and 10%). The habitat is expected to pass criterion C (that any scrub present accounts for less than 20% of the total grassland area), criterion F (Cover of bracken *Pteridium aquilinum* is less than 20%) and criterion G (that there is an absence of invasive non-native plant species).
- An area of modified grassland will be enhanced to become other neutral grassland in 'Moderate' condition. The habitat will pass criterion A, which asks whether it is a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type. The habitat will pass criterion B which asks whether sward height is varied. The habitat will also pass criterion D, which asks whether cover of bracken *Pteridium aquilinum* is less than 20% and cover of scrub. The habitat will also pass criterion E which asks if combined cover of species indicative of suboptimal condition

accounts for less than 5% of the total area. The habitat will fail criterion C, which asks if the cover of bare ground will be between 1 % and 5%, this is due to the predicted heavy vehicle use. The habitat will also fail criterion F, which asks whether There are 10 or more vascular plant species per m2 present.

5.0 EVALUATION AND DISCUSSION

Under the proposals, as set out in the 'Proposed Site Layout' drawing, and in the absence of additional enhancement measures and habitat creation, the development is predicted to deliver 1.83 HU, which is a decrease of 5.15 HU. This corresponds to an equivalent -73.73% BNG. A copy of the SBM calculation tool outputs is provided in Appendix E. The proposals are therefore not in compliance with local and national planning policy (see Appendix F).

Table 5.1 below evaluates whether the habitat types that will be present post-development will contribute 'significant enhancements'.

Table 5.1 Significant Enhancements Evaluation

Criteria	Present/Absent	Comments
Habitats of medium or higher distinctiveness in the biodiversity metric (created)	Present	Through creation of mixed scrub
Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development	Absent	Largest score is 0.064 HU (mixed scrub) compared to a baseline HU value of 6.95 (0.92% of the total HU units).
Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development	Absent	Pre = Low, Low, Medium, Medium Post = Low, Medium, Medium, V. Low
Areas of habitat creation or enhancement which are significant in area relative to the size of the development	Absent	Largest collective area is 0.0964ha (modified grassland) compared to site area of 3.14ha (3.07% of the total area)
Enhancements to habitat condition, for example from poor or moderate to good	Present	Modified grassland in poor condition as baseline, predicted to be enhanced to moderate condition post-development.

The habitats that will be present on-site post-development will comprise common habitat types/be of limited extent and will be delivering a significant decrease in biodiversity units. Therefore, the development is evaluated as not providing a significant BNG and significant enhancements.

Off-site compensation should be sought to help deliver 10% BNG. Conservations are currently ongoing with the client about how to achieve this.

Further qualitative ecological enhancement should ideally also be targeted on-site through the provision of invertebrate habitat features (such as pollinator posts or bee bricks), bird boxes (such as for garden birds) and bat boxes, to help protect nationally and locally important species, including those specified in national, regional and local Biodiversity Action Plans.

6.0 OFF-SITE COMPENSATION

It was identified in Section 4.0 and Section 5.0 that a 10% BNG on-site was not achievable with the post-development proposals.

As such, off-site compensation will be required to provide a 10% BNG for the proposals. The off-site compensation required to meet 10% BNG is 5.848 HU and 0.066 HeU.

This will be provided through off-site compensation within the ownership of Portsmouth City Council. Land is being assessed to act as a BNG receptor site for all future Dunsbury Park plots within the vicinity of the site.

7.0 SUMMARY AND CONCLUSIONS

In accordance with the Environment Act 2021, the National Planning Policy Framework and local policy (Appendix F), developments (with a few exemptions) have to deliver at least a 10% net gain in biodiversity, which should be evidenced through a complete BNGA using the SBM.

This BNGA has been completed to identify the pre-development (baseline) biodiversity value of the site and compare against the predicted post-development biodiversity value.

The baseline value for the site has been calculated as 6.98 HU and 0.06 HeU.

The 10% BNG targets are therefore a total of 7.678 for HU, and 0.066 for HeU ideally delivered fully on-site.

The post-development design proposals are predicted to deliver 1.83 HU. This is a net loss of 5.15 HU (equivalent to - 73.73% for HU).

The post-development design proposals are predicted to deliver 0 HeU. This is a net loss of 0.06 HeU (equivalent to -100 % for HeU).

The design proposals do meet the BNG Trading Rules for habitat types/distinctiveness level.

The BNGA has identified that the 10% BNG target will not be fully delivered on-site. Off-site compensation is therefore required to deliver the residual units, totalling **5.848 HU** and **0.066HeU**.

Off-site compensation options should be investigated; this will be provided through off-site compensation within the ownership of Portsmouth City Council. Land is being assessed to act as a BNG receptor site for all future Dunsbury Park plots within the vicinity of the site. The proposed development is predicted to not deliver a significant BNG due to the small scale of habitat creation and types of habitats that will be present post development i.e. habitats of low value/distinctiveness which do not require condition assessments. Therefore, detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and management can be provided within a Landscape and Ecological Management Plan (LEMP) for the site, which could be secured through planning condition. A HMMP will be required for any off-site biodiversity gains established/created. Should these recommendations be adhered to and so long as 10% BNG is delivered, the proposals stand to be compliant with legislation and current planning policy.

Upon receiving planning permission, the submission of a Biodiversity Gain Plan (BGP) to the LPA will be required. This BGP must include details of the proposed off-site BNG compensation, including the Biodiversity Gain Site Register Reference.

Qualitative habitat enhancement recommendations have also been given to further increase the ecological value of the scheme.

APPENDIX A PRE-DEVELOPMENT (BASELINE) HABITAT MAP

Figure A.1 Pre-development (Baseline) Habitat Map

DUNSBURY PARK PLOT 600-601 BASELINE HABITATS

- Red Line Boundary
- Hedgerow Baseline**
- Native hedgerow with trees
- Habitats Baseline**
- Bramble scrub
- Modified grassland
- Google Satellite

Title: Dunsbury Park Plot 600-601 Baseline
Habitats

Drawn by: AR
Date: 17/03/2026

Reviewed by: DP
Date: 17/03/2026

Project number: 553134
Sources: Google Satellite



APPENDIX B POST-DEVELOPMENT HABITAT MAP

Figure B.1 Post-development Habitat Map

DUNSBURY PARK PLOT 600-601 PROPOSED HABITATS

 Red Line Boundary

Hedgerows Proposed EDIT ME
Lost

Habitats Proposed EDIT ME

 Buildings

 Developed land; sealed surface

 Mixed scrub

 Modified grassland

 Other neutral grassland

Google Satellite

Title: Dunsbury Park Plot 600-601 Proposed
Habitats

Drawn by: AR
Date: 17/03/2026

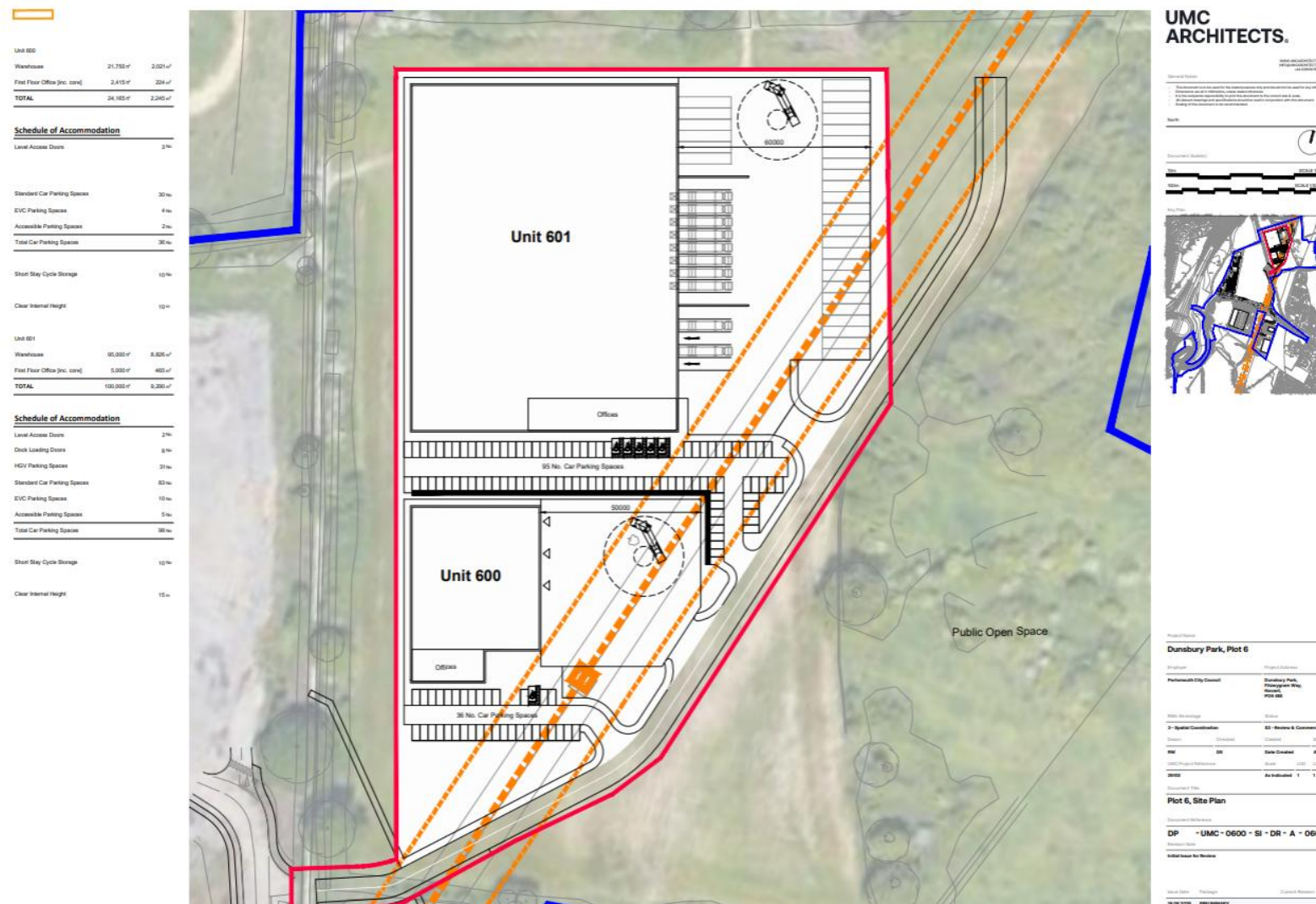
Reviewed by: DP
Date: 17/03/2026

Project number: 553134
Sources: Google Satellite



APPENDIX C SITE LAYOUT PLANS

Figure C.1 Site Layout Plans



APPENDIX D CONDITION ASSESSMENTS

The highlighted green text below indicates which condition has been achieved for each habitat.

Baseline Habitats

Urban - Developed Land; Sealed Surface

No assessment is required for this habitat as the condition is fixed within the SBM as N/A.

Scrub - Bramble Scrub

No assessment is required for this habitat as the condition is fixed within the SBM as Condition Assessment N/A

Individual Trees - Urban Trees

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	The tree is a native species (or at least 70% within the block are native species).	Yes	<i>Quercus robur</i>
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Yes	Auto-pass for individual trees
C	The tree is mature (or more than 50% within the block are mature). ¹	Yes	Tree is semi-mature
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	No	Tree exhibits adverse health impacts and has far below 75% of expected canopy size
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No	Not visible due to bramble coverage
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Tree is in undeveloped context

Condition Assessment Criteria	Criterion passed (Yes or No)	Notes (such as justification)
Number of criteria passed		
Condition Assessment Result (out of 6 criteria)	Condition Assessment Score	Score Achieved x/√
Passes 5 or 6 criteria	Good (3)	
Passes 3 or 4 criteria	Moderate (2)	x
Passes 2 or fewer criteria	Poor (1)	
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.		

Footnotes
Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from: Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk)

Modified Grassland

Condition Assessment Criteria		Criterion Passes (Yes or No)
A	There are 6-8 vascular plant species per m2 present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition.	No
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present).	Yes
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities (Footnote 2).	No
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	No
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes
G	There is an absence of invasive non-native plant species (Footnote 3) (as listed on Schedule 9 of WCA (Footnote 4)).	Yes
Essential criterion achieved (Yes or No)		No
Number of criteria passed		3
Condition Assessment Result		Condition Assessment Score
Passes 6 or 7 criteria including passing essential criterion A		Good (3)
Passes 4 or 5 criteria including passing essential criterion A		Moderate (2)
Passes 3 or fewer criteria; OR Passes 4 -6 criteria (excluding criterion A)		Poor (1)
Footnotes		

Condition Assessment Criteria	Criterion Passes (Yes or No)
<p>Footnote 1 - Creeping thistle <i>Cirsium arvense</i>, spear thistle <i>Cirsium vulgare</i>, curled dock <i>Rumex crispus</i>, broad-leaved dock <i>Rumex obtusifolius</i>, common nettle <i>Urtica dioica</i>, creeping buttercup <i>Ranunculus repens</i>, greater plantain <i>Plantago major</i>, white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i>.</p> <p>Footnote 2 - For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.</p> <p>Footnote 3 - Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels, accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.</p> <p>Footnote 4 - Wildlife and Countryside Act 1981 (as amended).</p>	

Native hedgerow

Hedgerow favourable condition attributes					
Attributes and functional groupings (A, B, C, D and E)	Criteria - the minimum requirements for 'favourable condition'	Criteria description		Criterion passed (Yes or No)	Notes (such as justification)
Core groups - applicable to all hedgerow types					

Hedgerow favourable condition attributes					
A1.	Height	>1.5 m average along length	<p>The average height of woody growth estimated from base of stem to the top of the shoots, excluding any bank beneath the hedgerow, any gaps or isolated trees.</p> <p>Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice).</p> <p>A newly planted hedgerow does not pass this criterion (unless it is >1.5 m height).</p>	Yes	
A2.	Width	>1.5 m average along length	<p>The average width of woody growth estimated at the widest point of the canopy, excluding gaps and isolated trees.</p> <p>Outgrowths (such as blackthorn <i>Prunus spinosa</i> suckers) are only included in the width estimate when they are >0.5 m in height.</p> <p>Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice).</p>	No	

Hedgerow favourable condition attributes					
B1.	Gap - hedge base	Gap between ground and base of canopy <0.5 m for >90% of length	<p>This is the vertical 'gappiness' of the woody component of the hedgerow, and its distance from the ground to the lowest leafy growth.</p> <p>Certain exceptions to this criterion are acceptable (see page 65 of the Hedgerow Survey Handbook).</p>	No	
B2.	Gap - hedge canopy continuity	<p>Gaps make up <10% of total length; and</p> <p>No canopy gaps >5 m</p>	<p>This is the horizontal 'gappiness' of the woody component of the hedgerow. Gaps are complete breaks in the woody canopy (no matter how small).</p> <p>Access points and gates contribute to the overall 'gappiness' but are not subject to the >5 m criterion (as this is the typical size of a gate).</p>	No	

Hedgerow favourable condition attributes					
C1.	Undisturbed ground and perennial vegetation	<p>>1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length:</p> <ul style="list-style-type: none"> · Measured from outer edge of hedgerow; and · Is present on one side of the hedgerow (at least). 	<p>This is the level of disturbance (excluding wildlife disturbance) at the base of the hedgerow.</p> <p>Undisturbed ground is present for at least 90% of the hedgerow length, greater than 1 m in width and must be present along at least one side of the hedgerow.</p> <p>This criterion recognises the value of the hedgerow base as a boundary habitat with the capacity to support a wide range of species. Cultivation, heavily trodden footpaths, poached ground etc. can limit available habitat niches.</p>	No	
C2.	Nutrient-enriched perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground.	The indicator species used are nettles <i>Urtica</i> spp., cleavers <i>Galium aparine</i> and docks <i>Rumex</i> spp. Their presence, either singly or together, does not exceed the 20% cover threshold.	No	

Hedgerow favourable condition attributes					
D1.	Invasive and neophyte species	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA3) and recently introduced species.	Recently introduced species refer to plants that have naturalised in the UK since AD 1500 (neophytes). Archaeophytes count as natives. For information on archaeophytes and neophytes see the JNCC website (footnote 1), as well as the BSBI website (footnote 2) where the 'Online Atlas of the British and Irish Flora' (footnote 3) contains an up-to-date list of the status of species. For information on invasive non-native species see the GB Non-Native Secretariat website (footnote 4).	Yes	
D2.	Current damage	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities.	<p>This criterion addresses damaging activities that may have led to or lead to deterioration in other attributes.</p> <p>This could include evidence of pollution, piles of manure or rubble, or inappropriate management practices (for example, excessive hedgerow cutting).</p>	No	
Additional group - applicable to hedgerows with trees only					
E1.	Tree class	There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and or ancient (footnote 5)), and there is on average at least one mature, ancient or veteran tree present per 20 - 50m of hedgerow.	This criterion addresses if there are a range of age-classes or morphologies which allow for replacement of trees and provide opportunities for different species.	No	

Hedgerow favourable condition attributes

E2.	Tree health	At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	This criterion identifies if the trees are subject to damage which compromises the survival and health of the individual specimens.	No	
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The hedgerow condition assessment generates a weighting (score) ranging from 1 - 3, which is used within the Statutory Biodiversity Metric. The scores for each are set out in the tables below.

Condition categories for hedgerows without trees

Category	Category Requirements	Metric Score
Good	No more than 2 failures in total; AND No more than 1 failure in any functional group.	3
Moderate	No more than 4 failures in total; AND Does not fail both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and C2 = Moderate condition).	2

Hedgerow favourable condition attributes

Poor	Fails a total of more than 4 attributes; OR Fails both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).	1
Score achieved:		2

Footnotes

Footnote 1 – CHEFFINGS, C. M. et al. (2005) The Vascular Plant Red Data List for Great Britain. Species Status 7: 1-116. [online] Available on:

[The Vascular Plant Red Data List for Great Britain \(Species Status No. 7\) | JNCC Resource Hub](#)

Footnote 2 – BOTANICAL SOCIETY OF BRITAIN AND IRELAND (BSBI). Definitions: wild, native or alien? [online] Available on:

[Definitions: wild, native or alien? – Botanical Society of Britain & Ireland \(bsbi.org\)](#)

Footnote 3 – BSBI and Biological Records Centre (BRC) (2022) Online Atlas of the British and Irish Flora. [online] Available on:

[Acknowledgements | Online Atlas of the British and Irish Flora \(brc.ac.uk\)](#)

Footnote 4 – GB NON-NATIVE SPECIES SECRETARIAT (GBNNSS) (2022) Available on:

[Home » NNSS \(nonnativespecies.org\)](#)

Footnote 5 – See gov.uk standing advice on ancient and veteran trees. Available from:

[Keepers of time: ancient and native woodland and trees policy in England \(publishing.service.gov.uk\)](#)

and

[Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#)

Proposed Habitats

Urban - Developed Land; Sealed Surface

No assessment is required for this habitat as the condition is fixed within the SBM as N/A.

Modified Grassland

Condition Assessment Criteria		Criterion Passes (Yes or No)
A	There are 6-8 vascular plant species per m2 present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition.	No
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present).	Yes
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities (Footnote 2).	No
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	No
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes
G	There is an absence of invasive non-native plant species (Footnote 3) (as listed on Schedule 9 of WCA (Footnote 4)).	Yes
Essential criterion achieved (Yes or No)		No
Number of criteria passed		3
Condition Assessment Result		Condition Assessment Score
Passes 6 or 7 criteria including passing essential criterion A		Good (3)

Condition Assessment Criteria		Criterion Passes (Yes or No)
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)	
Passes 3 or fewer criteria; OR Passes 4 -6 criteria (excluding criterion A)	Poor (1)	
Footnotes		
<p>Footnote 1 - Creeping thistle <i>Cirsium arvense</i>, spear thistle <i>Cirsium vulgare</i>, curled dock <i>Rumex crispus</i>, broad-leaved dock <i>Rumex obtusifolius</i>, common nettle <i>Urtica dioica</i>, creeping buttercup <i>Ranunculus repens</i>, greater plantain <i>Plantago major</i>, white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i>.</p> <p>Footnote 2 - For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.</p> <p>Footnote 3 - Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels, accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.</p> <p>Footnote 4 - Wildlife and Countryside Act 1981 (as amended).</p>		

Mixed scrub

Condition Assessment Criteria			Criterion passed (Yes or No)	Notes (such as justification)
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range). ¹ - At least 80% of scrub is native, - There are at least three native woody species ² , - No single species comprises more than 75% of the cover (except hazel <i>Corylus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> (only in its restricted native range), or box <i>Buxus sempervirens</i> , which can be up to 100% cover).		Yes	
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran ³) shrubs are all present.		Yes	
C	There is an absence of invasive non-native plant species ⁴ (as listed on Schedule 9 of WCA ⁵) and species indicative of suboptimal condition ⁶ make up less than 5% of ground cover.		Yes	
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.		No	
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.		No	

Condition Assessment Criteria			Criterion passed (Yes or No)	Notes (such as justification)
Number of criteria passed				
Condition Assessment Result (out of 5 criteria)	Condition Assessment Score	Score Achieved	x/√	
Passes 5 criteria	Good (3)			
Passes 3 or 4 criteria	Moderate (2)	x		
Passes 2 or fewer criteria	Poor (1)			

Footnotes

Footnote 1 – Professional judgement should be used alongside the UKHab description.

Footnote 2 – Native woody species as defined and listed in the Hedgerow Survey Handbook: DEFRA (2007) Hedgerow Survey Handbook: A standard procedure for local surveys in the UK. 2nd ed. [online]. Defra, London. PB1195. Available from: Hedgerow Survey Handbook (publishing.service.gov.uk).

Footnote 3 – See gov.uk standing advice on ancient and veteran species. Available from:

[Keepers of time: ancient and native woodland and trees policy in England \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614441/Keepers_of_time_-_ancient_and_native_woodland_and_trees_policy_in_England.pdf)

and

[Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/614441/Ancient_woodland,_ancient_trees_and_veteran_trees_advice_for_making_planning_decisions.pdf)

Footnotes

Footnote 4 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels, accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.

Footnote 5 – Wildlife and Countryside Act 1981 (as amended).

Footnote 6 – Species indicative of suboptimal condition for this habitat type may include: non-native conifers, tree-of-heaven *Alianthus altissima*, holm oak *Quercus ilex*, European turkey oak *Quercus cerris*, cherry laurel *Prunus laurocerasus*, snowberry *Symphoricarpos spp.*, shallon *Gaultheria shallon*, American skunk cabbage *Lysichiton americanus*, buddleia *Buddleja spp.*, cotoneaster *Cotoneaster spp.*, Spanish bluebell *Hyacinthoides hispanica* and hybrid bluebells *Hyacinthoides x massartiana*. There may be additional relevant species local to the region and or site.

Other neutral grassland (created and enhanced)

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	<p>The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type (and relative to Footnote 3 suboptimal species which may be listed in the UKHab description).¹</p> <p>Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.</p>	Yes	

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Yes	
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens ² .	No	
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Yes	
E	<p>Combined cover of species indicative of suboptimal condition³ and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.</p> <p>If any invasive non-native plant species⁴ (as listed on Schedule 9 of WCA5) are present, this criterion is automatically failed.</p>	Yes	
Additional Criterion - must be assessed for all non-acid grassland types			

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
F	There are 10 or more vascular plant species per m2 present, including forbs that are characteristic of the habitat type (species referenced in Footnotes 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	No	
Essential criterion for Good condition achieved (for non-acid grassland) (Yes or No)		Yes	
Number of criteria passed		4	
Non-acid grassland types (Result out of 6 criteria)			
Passes 5 or 6 criteria, including essential criterion A and additional criterion F.		Good (3)	
Passes 3 - 5 criteria, including essential criterion A.		Moderate (2)	x
Passes 2 or fewer criteria; OR Passes 3 or 4 criteria excluding criterion A and F.		Poor (1)	

Footnotes

Footnote 1 – Creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, curled dock *Rumex crispus*, broad-leaved dock *Rumex obtusifolius*, common nettle *Urtica dioica*, creeping buttercup *Ranunculus repens*, greater plantain *Plantago major*, white clover *Trifolium repens* and cow parsley *Anthriscus sylvestris*.

Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.

Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels, accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.

Footnote 4 – Wildlife and Countryside Act 1981 (as amended).

APPENDIX E STATUTORY BIODIVERSITY METRIC HEADLINE RESULTS

Dunsbury Park		Return to results menu	
Headline Results			
Scroll down for final results ▲			
On-site baseline	Area habitat units	6.98	
	Hedgerow units	0.06	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	1.83	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	Area habitat units	-5.15	-73.73%
	Hedgerow units	-0.06	-100.00%
	Watercourse units	0.00	0.00%
		On-site net gain is less than target rat ▲	
		On-site net gain is less than target rat ▲	
Off-site baseline	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Area habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-5.15	
	Hedgerow units	-0.06	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Area 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)	Area habitat units	-5.15	
	Hedgerow units	-0.06	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-73.73%	Total net gain achieved is less than target rat ▲
	Hedgerow units	-100.00%	Total net gain achieved is less than target rat ▲
	Watercourse units	0.00%	
Trading rules satisfied?	No - Check Trading Summaries ▲		

Project Name: Dunsbury Park Map Reference:

A-1 On-Site Habitat Baseline

Condense / Show columns Condense / Show Rows

Main Menu

Area habitat summary

Total Net Unit Change	-5.15
Total Net % Change	-73.73%
Trading Rules Satisfied	No - check trading summaries ▲

Ref	Existing area habitats				Distinctiveness	Condition	Strategic significance	Required Action to Meet Trading Rules	Ecological baseline						
	Broad Habitat	Habitat Type	Irreplaceable habitat	Area (hectares)	Distinctiveness	Condition	Strategic significance		Total habitat units	Area retained	Area enhanced	Baseline units retained	Baseline units enhanced	Area habitat lost	Units lost
1	Grassland	Modified grassland	No	3.0659	Low	Poor	Location ecologically desirable but not in local strategy	Same distinctiveness or better habitat required ≥	6.74	0	0	0.00	0.00	3.07	6.74
2	Grassland	Modified grassland	No	0.0471	Low	Poor	Location ecologically desirable but not in local strategy	Same distinctiveness or better habitat required ≥	0.10	0	0.0471	0.00	0.10	0.00	0.00
3	Heathland and shrub	Bramble scrub	No	0.0225	Medium	Condition Assessment N/A	Location ecologically desirable but not in local strategy	Same broad habitat or a higher distinctiveness habitat required (≥)	0.10	0	0	0.00	0.00	0.02	0.10
4	Individual trees	Urban tree	No	0.0041	Medium	Moderate	Location ecologically desirable but not in local strategy	Same broad habitat or a higher distinctiveness habitat required (≥)	0.04	0.0041	0	0.04	0.00	0.00	0.00
5															
6															
7															
8															
	Total habitat area				3.14				6.98	0.00	0.05	0.04	0.10	3.09	6.84
	Site Area (Excluding area of individual trees, green walls, intertidal hard structures)				3.14										

M² to hectares conversion tool:

Select a Hectares M²

Total area lost (excluding area of individual trees, green walls and intertidal hard structures)

3.09

Project Name: Dunsbury Park Map Reference:				Area habitat summary			
A-2 On-Site Habitat Creation				Total Net Unit Change -5.15			
Condense / Show Columns Condense / Show Rows				Total Net % Change -73.73%			
Main Menu				Trading Rules Satisfied No - check trading summaries ▲			
				Area Check Area Acceptable ✓			

Post intervention habitats											
Ref	Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness	Condition	Strategic significance	Temporal multiplier	Difficulty		Habitat units delivered	
				Distinctiveness	Condition	Strategic significance	Standard or adjusted time to target condition	Final time to target condition (years)	Final difficulty of creation		
1	Grassland	Modified grassland	0.0964	Low	Poor	Location ecologically desirable but not in local strategy	Standard time to target condition applied	1	Low	0.20	
2	Grassland	Other neutral grassland	0.0858	Medium	Moderate	Location ecologically desirable but not in local strategy	Standard time to target condition applied	5	Low	0.63	
3	Heathland and shrub	Mixed scrub	0.087	Medium	Moderate	Location ecologically desirable but not in local strategy	Standard time to target condition applied	5	Low	0.64	
4	Urban	Developed land; sealed surface	1.1106	V.Low	N/A - Other	Location ecologically desirable but not in local strategy	Standard time to target condition applied	0	Low	0.00	
5	Urban	Developed land; sealed surface	1.7086	V.Low	N/A - Other	Location ecologically desirable but not in local strategy	Standard time to target condition applied	0	Low	0.00	
6											
7											
8											
9											
10											
Total habitat area			3.09								1.48
Site Area (Excluding area of individual trees, green walls, intertidal hard structures)			3.09								
M² to hectares conversion tool:			Select a unit	Hectares	M²						

Project Name: Dunsbury Park Map Reference:				Area habitat summary			
A-3 On-Site Habitat Enhancement				Total Net Unit Change -5.15			
Condense / Show Columns Condense / Show Rows				Total Net % Change -73.73%			
Main Menu				Trading Rules Satisfied No - check trading summaries ▲			

Post intervention habitats														
Baseline ref	Baseline habitats	Proposed Habitat (Broad habitat pre-populated but can be overridden)		Change in distinctiveness and condition		Area (hectares)	Distinctiveness	Condition	Strategic significance	Temporal risk multiplier	Difficulty risk multipliers		Habitat units delivered	
		Proposed Broad Habitat	Proposed habitat	Distinctiveness change	Condition change				Strategic significance	Standard or adjusted time to target condition	Final time to target condition (years)	Final difficulty of enhancement		
2	Grassland - Modified grassland	Grassland	Other neutral grassland	Low - Medium	Lower Distinctiveness Habitat - Moderate	0.0471	Medium	Moderate	Location ecologically desirable but not in local strategy	Standard time to target condition applied	10	Low	0.32	
Total habitat area						0.05								0.32

Project Name: Dunsbury Park Map Reference:				Hedgerow summary			
B-1 On-Site Hedge Baseline				Total Net Unit Change	-0.06		
				Total Net % Change	-100.00%		
				Trading Rules Satisfied	No - check trading summary ▲		
Condense / Show Columns				Condense / Show Rows			
Main Menu							

Ref	Existing hedgerow habitats			Distinctiveness	Condition	Strategic significance	Required Action to Meet Trading Rules	Ecological baseline Total hedgerow units
	Hedge number	Habitat type	Length (km)	Distinctiveness	Condition	Strategic significance		
1		Native hedgerow	0.013	Low	Moderate	Location ecologically desirable but not in local strategy	Same distinctiveness band or better	0.06
2								
3								
4								
5								
6								
			0.01					0.06

Length retained	Length enhanced	Units retained	Units enhanced	Length lost	Units lost
0	0	0.00	0.00	0.01	0.06
0.00	0.00	0.00	0.00	0.01	0.06

APPENDIX F RELEVANT LEGISLATION AND POLICY

F.1 LEGISLATION

The BNGA 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 Environment Plan (DEFRA, 2018);
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (DEFRA, 2011);
- National Planning Policy Framework (NPPF) (MHCLG, 2023);
- The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006);
- The Environment Act (DEFRA, 2021); and
- [DISTRICT] ([LPA, YEAR]).
- [COUNTRY-SPECIFIC LEGISLATION IF REQUIRED, DELETE ABOVE AS APPROPRIATE]

The Environment Act, 2021

Under the Environment Act, 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of off-site compensation, or the purchase of statutory credits.

The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the LPA.

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

Under the Act, the enhancements must be maintained for at least 30 years.

F.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2023¹² sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

Local

Havant Borough Core Strategy.¹³

DM8 Conservation, Protection and Enhancement of Existing Natural Features

Development will only be permitted where it protects and enhances local habitats and landscape distinctiveness and which addresses all of the relevant criteria as set out below:

1. Protects natural features of nature conservation and/or amenity importance on the site, for example trees, woodlands, hedgerows, soils, streams, stream corridors, springs, ditches or ponds from damage, destruction and a deterioration in quality.
2. Sympathetically incorporates existing features into the overall design of the scheme including measures taken to ensure their continued survival.
3. Provides new landscape works that integrate successfully with the local environment and existing natural features, using local materials and plant species and making provision for future maintenance of new landscape works associated with new developments.
4. Ensures sequences of greenspaces are maintained and protects the attractiveness and visual amenity of all green open spaces that contribute to the identity of the borough.

REFERENCES

- ¹ UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>).
- ² CIEEM (2017); *Guidelines for Preliminary Ecological Appraisal*, 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- ³ BSI (2013); *British Standard 42020:2013: Biodiversity — Code of practice for planning and development*, BSI Standards Publication
- ⁴ Department for Environment Food and Rural Affairs (2024) *The Statutory Biodiversity Metric User Guide*. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides#:~:text=The%20statutory%20biodiversity%20metric%20tool,the%20statutory%20biodiversity%20metric%20too>
- ⁵ Natural Aptitude (2024) *Coreo* (Software Application). Available at: <https://coreo.io/>.
- ⁶ UKTAG (UK Technical Advisory Group). (2003). *Guidance on Typology for Lakes for the UK*. Water Directive Framework.
- ⁷ EEA (European Environment Agency). (2019). *EUNIS Habitat Classification*. Available at: <https://www.eea.europa.eu/data-and-maps/data/eunis-habitat-classification>
- ⁸ JNCC (Joint Nature Conservation Committee) *Annex I Habitat Types* (2019) Available at: <https://sac.jncc.gov.uk/habitat/>
- ⁹ DEFRA (2026) 'MAGIC map'. Available from: <https://magic.defra.gov.uk/>
- ¹⁰ Hampshire County Council (2025) 'Local Nature Recovery Strategy for Hampshire'. Available from: <https://www.hants.gov.uk/landplanningandenvironment/nature-recovery-hampshire/hampshire-strategy>
- ¹¹ Havant Borough Council (2011) 'Core Strategy (2011)'. Available from: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/core-strategy-and-allocations-plan-adopted-local-plan>
- ¹² GOV.UK. (2023). *National Planning Policy Framework*. [online] Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- ¹³ Havant Borough Council (2011) 'The Core Strategy'. Available from: <https://www.havant.gov.uk/planning-services/planning-policy/local-plan/core-strategy-and-allocations-plan-adopted-local-plan>