Carpenders Park, Three Rivers

Burlington Developments London Limited

Biodiversity Net Gain Report

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1. Introduction

1.1. Background & Proposals

1.1.1. Ecology Solutions was commissioned by Burlington Property Group in July 2024 to provide a Biodiversity Net Gain report for Carpenders Park, Three Rivers (see Plan ECO1), hereafter, referred to as 'the site'.

1.1.2. The development proposal is for mixed-use with up to 256 homes, housing with care, a children's home and associated parking, open space, Sustainable Urban Drainage (SUDs), landscaping and vehicular access.

1.2. Site Characteristics

1.2.1. The site measures approximately 12.7ha in size and is located to the east of Carpenders Park, a suburb of Watford. Arable land boarders the site to the immediate north with the A4008 extending along the western site boundary. Carpenders Park Care Home is additionally present to the west of the site, beyond which is housing. Little Hartsbourne Wood which is managed by the Woodland Trust, constitutes most of the eastern site boundary. Grassland fields intersected by scrub extend southwards from the site with a tributary of the River Colne and Grims Dyke Golf Club situated further to the south.

1.2.2. The site is comprised of three fields separated by bands of Blackthorn *Prunus spinosa* scrub (see Plan ECO2). Mature trees are situated along the site's perimeter, in addition to within the central field. Areas of Bramble *Rubus fruticosus* and ruderal vegetation are also present throughout, with a small area of woodland extending into the southeast of the site, connecting to Little Hartsbourne Wood.

1.3. Biodiversity Net Gain Report

1.3.1. This document assesses the level of Biodiversity Net Gain within the site. This report has been prepared with due consideration to the guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM)[1][2] in relation to Biodiversity Net Gain. This assessment has been based around the results of the habitat survey undertaken in July 2024 for the development site.

1.3.2. This report has been amended in response to comments received by Herts Ecology on 27 October 2025 and 26 February 2026.

[1] CIEEM (2019). *Biodiversity Net Gain. Good Practice Principles for Development, A Practical Guide.*
[2] CIEEM, CIRIA, IEMA (2016). *Biodiversity Net Gain: Good Practice Principles for Development.*

2. Statutory Biodiversity Metric

2.1. The Statutory Biodiversity Metric was released on 29 November 2023 and was last updated on 3 July 2025. It uses habitat features as a proxy measure for capturing the value and importance of nature and uses calculations to assess the importance of each habitat based on its size, ecological condition and strategic location.

2.2. Methodology

2.2.1. The proposed development site was surveyed in July 2024 based on UK Habitat (UKHab) Classification methodology, as recommended by Natural England, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. This technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey. Any such areas identified can then be examined in more detail.

2.2.2. Measurements for on-site habitats pre-development were calculated using Natural England's QGIS Net Gain Habitat Mapping template and QGIS Import Tool. Information regarding the habitats present, as well as their condition, were based on survey information obtained in July 2024 by Ecology Solutions (see report: 12195.EcoAs.vf4). The Biodiversity Metric User Guide[3], as well as professional judgement, was used to inform the habitats' condition criteria.

2.2.3. Measurements for post-development on-site habitats are based on the Illustrative Landscape Masterplan (drawing ref. P24-2420-EN-08) by Pegasus Group (see Appendix 1).

[3] DEFRA (2024). *The Statutory Biodiversity Metric, User Guide,* Department for Environmental, Food and Rural Affairs

3. Results and Discussion of Metric

3.1. This section should be read in conjunction with the DEFRA Biodiversity Metric calculation tool and Ecology Solutions' Ecological Assessment, both of which have been provided separately.

3.2. On-site Baseline Habitat (Pre-Development)

3.2.1. The site was subject to a UKHab survey in July 2024. Visits undertaken across the 2025 survey season have confirmed that the on-site habitats remain unchanged since July 2024. Accordingly, this BNG assessment utilises baseline data collected prior to the date of the planning application.

3.2.2. The following main habitat / vegetation types were identified within the site during the surveys undertaken:

- Other neutral grassland;
- Blackthorn scrub;
- Bramble scrub;
- Tall forbs;
- Lowland deciduous woodland; and
- Individual trees

3.2.3. The location of these habitats, which are photographed and described in detail within the updated Ecological Assessment (report ref: 12195.EcoAs.vf4; dated March 2026), are illustrated on Plan ECO2.

3.2.4. Table 3.1 below summarises the habitats present on-site and replicates the condition assessment undertaken at the time of the UKHab classification survey. A baseline total of 119.91 habitat units are present pre-development.

3.2.5. Habitats were classified based on their conformity to UK habitat classifications[4] and condition assessments were completed for each habitat identified within the site. The Biodiversity Technical Supplement[5] as well as professional judgment was used to inform the habitats' condition criteria.

Irreplaceable Habitats

3.2.6. Forty-seven individual trees are present within the site (see Appendix 2). Of these, ten are considered as meeting the criteria for veteran trees. Veteran trees are considered to be irreplaceable habitat within the BNG metric as their losses cannot be compensated for within a reasonable timeframe. As such, irreplaceable habitats do not contribute to the BNG score for the site, as their losses cannot be offset through standard habitat creation or enhancement. Should any losses occur to irreplaceable habitats as a result of the proposed

[4] Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2020). *UK Habitat Classification – Habitat Definitions V2.0* at http://ukhab.org.
[5] DEFRA (2024). *The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology, Department for Environment, Food and Rural Affairs* Available at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

development, bespoke compensation would be required and agreed with the Local Planning Authority. No veteran trees are to be lost as part of the proposed development.

Table 3.1. Summary of on-site baseline habitats

Baseline habitat	Baseline Biodiversity Units	Condition Criteria / Pass or Fail / Indicator Score		Condition	Ecological Features and Condition Notes	After Works
Other neutral grassland	80.46	Grassland Medium Distinctiveness		Moderate (4 / 6 condition criteria passed = Moderate	Three other neutral grassland fields comprise the majority of the site. The areas exhibit high species diversity and are generally dominated by Yorkshire Fog *Holcus lanatus*. The grassland areas are overall, a good representation of their habitat type. Although species diversity is high, 10 or more vascular plant species are not present per square metre and the grassland includes high proportions of sub-optimal species. Such species include Creeping Thistle *Cirsium arvense*, White Clover *Trifolium repens*, Greater Plantain *Plantago major,* Curled Dock *Rumex crispus,* Creeping Buttercup *Ranunculus repens* and Common Nettle *Urtica dioica.* Therefore, the grassland fails Criteria E and essential Criteria F, meaning the habitat reaches moderate condition.	63.42 units lost 17.05 units enhanced
		A – The grassland is a good representation of the habitat type it has been identified as.	Pass			
		B – There is a varied sward height.	Pass			
		C – Cover of bare ground is between 1% and 5%.	Pass			
		D – Cover of Bracken is below 20% and cover of scrub is below 5%.	Pass			
		E – Combined cover of species indicative of a sub-optimal condition and physical damage are below 5% cover. No invasive non-native plant species are present.	Fail			
		F – There are 10 or more vascular plant species per square metre.	Fail			
	10.66	Heathland and Shrub Medium Distinctiveness		Moderate		

Baseline habitat	Baseline Biodiversity Units	Condition Criteria / Pass or Fail / Indicator Score		Condition	Ecological Features and Condition Notes	After Works
Blackthorn Scrub		A – Scrub is a good representation of the habitat type.	Pass	(4 / 5 condition criteria passed, = Moderate)	Blackthorn scrub is present to the site boundaries and delineates the three grassland fields. Other species present include Ash *Fraxinus excelsior,* Hawthorn *Crataegus monogyna,* Bramble and Oak *Quercus robur.* The scrub does not include any clearings or glades and therefore fails Criterion E. The habitat is conditioned as Moderate. Areas of scrub will be retained and enhanced where possible, with areas cut back to 5m width and height. Further scrub will be planted adjacent to retained areas within the centre of the site.	3.05 units lost 4.76 units retained 2.85 units enhanced
		B – Seedlings, saplings, young shrubs and mature shrubs all present.	Pass			
		C – Absence of invasive non-native plant species.	Pass			
		D – Scrub has well developed edge with scattered scrub and grassland or forbs.	Pass			
		E – There are clearings, glades or rides present within the scrub.	Fail			
Bramble Scrub	3.11	Condition Assessment N/A		N/A	Eight areas of Bramble scrub are present throughout the site, with the largest area along the western boundary of the central grassland field. No condition assessment is required for this habitat type.	2.12 units lost 0.05 units retained 0.94 units enhanced

Baseline habitat	Baseline Biodiversity Units	Condition Criteria / Pass or Fail / Indicator Score		Condition	Ecological Features and Condition Notes	After Works
Tall Forbs	1.09	Sparsely Vegetated Land Low Distinctiveness		Moderate (2 / 3 condition criteria passed = Moderate)	Tall Forbs habitat is present to the western boundary of the central grassland field and the southern site boundary. The largest area is dominated by Common Nettle with occasional Ragwort. The other is a smaller patch dominated by Willowherb *Epilobium* sp. As Common Nettle and Willowherb dominate, they account for over 80% of these areas, failing Condition Criteria A. As such they reach Moderate condition.	1.09 units lost
		A – Vegetation structure is varied. A single component does not account for >80% of total area.	Fail			
		B – Area contains different plant species of benefit to wildlife.	Pass			
		C – Invasive and non-native species cover <5% of total vegetated area.	Pass			
Lowland Mixed Deciduous Woodland	4.55	Woodland High Distinctiveness		Good Condition Indicator score of 37 / 39 = Good	Woodland present to the southeast of the site is connected to off-site Little Hartsbourne Wood, managed by the Woodland Trust. The woodland has been effectively managed to achieve a Good condition. Some damage to the woodland has been caused by vandalism, dog walkers, horses and bikes straying from the designated pathways.	4.55 units retained
		A – Age distribution of trees.	3			
		B – Wild, domestic and feral herbivore damage.	3			
		C – Invasive plant species.	3			

Baseline habitat	Baseline Biodiversity Units	Condition Criteria / Pass or Fail / Indicator Score		Condition	Ecological Features and Condition Notes	After Works
		D – Number of native trees species.	3		The small area of woodland is illustrated as priority deciduous woodland by the online MAGIC database. Woodland will be entirely retained as part of the development.	
		E – Cover of native tree and shrub species.	3			
		F – Open space within woodland.	3			
		G – Woodland regeneration.	3			
		H – Tree health.	3			
		I – Vegetation and ground flora.	3			
		J – Woodland vertical structure.	3			
		K – Veteran trees.	3			
		L – Amount of deadwood.	3			
		M – Woodland disturbance.	1			

Baseline habitat	Baseline Biodiversity Units	Condition Criteria / Pass or Fail / Indicator Score	Condition	Ecological Features and Condition Notes	After Works
Individual Trees	20.04	Condition assessments for Individual Trees are detailed at Appendix 2.	Good 6/6 condition criteria = Good)	47 trees are present within the site pre-development. Of these, ten are veteran trees (9 very large, 1 medium). These are irreplaceable within the BNG metric and therefore do not contribute to the overall baseline value. All veteran trees are to be safeguarded and retained as part of the development. Of the remaining trees, 13 are very large. 14 are large and the remaining 10 are medium sized. All trees are in good condition. The development will result in the loss of one large tree and 2 medium trees. All remaining trees will be retained.	19.21 units retained 0.83 units lost

3.3. On-site Habitat (Post-development)

3.3.1. Table 3.2 below summarises the habitats and hedgerows that are to be created on-site post-development and are illustrated on Plan ECO3 and also found on the Illustrative Landscape Masterplan (DWG: P24-2420_EN_08E, 03/03/2026) provided by Pegasus Group. Table 3.3 below summarises the enhancements proposed for the site, also shown on Plan ECO3.

3.3.2. The landscape strategy includes a variety of habitats and will comprise new other neutral grassland and modified grassland establishment, scrub planting, biodiverse green roof and vegetated gardens, in addition to Sustainable Urban Drainage (SUDs) with associated wetland grass and aquatic planting. Species-rich native hedgerows, traditional orchard planting and urban tree planting will also be undertaken across the site.

3.3.3. While retention and enhancement of the habitats considered to be of greatest value has been sought including areas of scrub and grassland, the proposed scheme would result in a net loss of 44.90 habitat units, largely due to the loss of other neutral grassland. This results in a net percentage loss of -37.45% in habitat units from pre- to post-development. The metric does not provide a percentage net gain for hedgerow units as no hedgerows are present in the site baseline. Nonetheless, there is an increase in hedgerow units as detailed by the metric (+5.48 units).

3.3.4. The targeted conditions for proposed habitats will be achieved through appropriate management undertaken during the operational phase of the development. This will ensure that the proposed habitats continue to offer biodiversity benefits in the future. It would be expected that a condition be applied to the planning permission detailing the prescribed planting, management and monitoring to be undertaken to ensure the aspirations set out are delivered.

Table 3.2. Summary of post-development habitats and hedgerow types that will be created.

Created Habitats				
Proposed Habitat	**Landscape Plan Habitat**	**Target Condition**	**Biodiversity Units Delivered**	**Target Condition Notes**
Other Neutral Grassland	Wildflower meadow / wet tolerant meadow grassland / mown footpaths	Good Poor	2.71 0.03 = 2.75	Areas of other neutral grassland will be seeded around the site in areas of previous scrub habitat lining footpaths around the development. These areas will be reflective of enhanced other neutral grassland areas within the site and be kept to the same management regime, thus achieving the same Good condition. Grassland will also constitute planting around new SUDs and will include native wetland species. These areas will not be highly managed but any invasive / non-native species will be controlled. These habitats will achieve Good condition. Mown walkways through the proposed community orchard and wildflower meadow are to be kept short for accessibility, therefore these areas are likely to fail Condition Criteria A. B and E and be in Poor condition.
Modified Grassland	Included within built form areas / amenity grass and open space	Poor	1.20	Areas of amenity planting and lawn will be established around residential properties within the site. It is anticipated that Modified Grassland habitat will account for approximately 10% of all built form residential areas. A larger open amenity grassland area for recreation is also proposed along the northern boundary of the site. These areas are expected to be managed for amenity and aesthetic value and will therefore fail essential Criterion A. As such, the grassland will be of Poor condition.
Traditional Orchard	Community orchard	Moderate	0.69	A community orchard is proposed in the northeast of the site. The area will include tree planting within wildflower meadow with informal mown grassland footpaths for accessibility. The fruit trees within the orchards will not be smothered by scrub, and scrub that begins to grow between trees will occupy less than 10% of the ground cover. Trees will be managed to maintain their longevity and be kept free from anthropogenic and animal damage. In addition, the underlying grassland will be species rich and free from overgrazing. The area will be managed so that

				invasive non-native plant species will be prevented from establishing. Species indicative of sub-optimal conditions will cover less than 10% of the underlying ground. To achieve good condition, the presence of ancient or veteran trees is required, in addition to the presence of deadwood in or on the trees. Thus, the proposed habitat will achieve Moderate condition.
Mixed Scrub	Proposed native shrub	Moderate	1.03	Mixed scrub will be established to the north of the proposed care home, along the western boundary of the development, in addition to adjoining Blackthorn scrub in the southwest of the site. The area will include native shrub planting with trees. The area will be managed to ensure the absence of invasive / non-native and sub-optimal species including Bracken. The scrub will likely fail Criteria B and E reaching Moderate condition.
Blackthorn Scrub	Blackthorn Scrub	Good	2.93	Existing areas of Blackthorn scrub delineating the fields will be cut back to 5m height and width, with new planting established adjacent to the managed areas. A ride will be present between the retained and newly planted scrub. The areas are expected to fulfil all criteria, achieving Good condition.
Biodiverse Green Roof	Green Roof	Good	1.13	Biodiverse green roof is proposed on the six new apartment blocks within the development. These areas will include a variety of sedum and wildflower planting. The habitat vegetation structure will be varied, providing opportunities for a variety of invertebrate species, The depth of the substrate will also be varied between 80 to 150mm with at least 50% being 150mm. The habitats should fulfil all 4 condition criteria and be of Good condition.
Vegetated Garden	Included within built form areas	Condition Assessment N/A	2.74	Vegetated garden is considered an appropriate classification within the built form areas. It is considered that vegetated gardens will account for approximately 30% of residential built form and 20% of the care home area. No condition assessment is applicable for this habitat type.
Other Woodland; Broadleaved	Native woodland	Poor	2.13	Woodland planting is proposed within the north of the site. Woodland is to include predominately Oak *Quercus robur* and Hazel *Corylus avellana.*

				New woodland planting will not exhibit a range of tree age classes, woodland regeneration, diverse vertical structure, veteran trees or deadwood. It will be in Poor condition at establishment.
Sustainable Drainage System	Attenuation Basin	Good	1.02	Two sustainable drainage systems are proposed in the northwest and southeast of the site. The areas will be seeded with a wet meadow grass on the banks and will be enhanced with appropriate native marginal and aquatic vegetation. The areas are expected to fulfil all condition criterion achieving Good condition.
Developed Land; Sealed Surface	Built form, access roads and footpaths	N/A	0	This area includes the proposed buildings, associated hardstanding and infrastructure throughout the site. Developed land will account for 60% of residential built form areas and 70% of the proposed care home area. No condition is applicable.
Artificial Unvegetated; Unsealed Surface	Locally Equipped Area for Play (LEAP)	N/A	0	A LEAP is positioned within a woodland parcel in the north of the site and another in the southwest corner of the development. No condition assessment is applicable for this habitat type.
Urban Tree	Tree Planting	Moderate Poor	1.39 0.55 = 1.94	160 trees are anticipated within the development, including scattered individual native tree planting along the site boundaries and throughout areas of open space. Trees within open areas are expected to achieve Moderate condition (70% - 112) meeting Criteria A, B, D and F. Remaining trees (30% - 48) along roads and walkways will likely be managed to achieve Poor condition.
Created Hedgerows				
Proposed Hedgerow	**Landscape Plan Habitat**	**Target Condition**	**Biodiversity Units Delivered**	**Target Condition Notes**

Species-rich native hedgerow	Mixed-species native hedgerow	Good	3.39	Species rich native hedgerows will be established to the north of the residential built form, with establishment also occurring within the centre of the site and to the south of new woodland along the western site boundary. The hedgerows will be managed to ensure that invasive / non-native species remain absent. The features are expected to fulfil Criteria A1, A2, B1, B2, C1, D1 and D2, achieving Good condition.
Species-rich native hedgerow with trees	Mixed-species native hedgerow with trees.	Good	2.09	Includes native hedgerow planting to the east and south of the proposed care home, alongside existing individual trees. The hedgerow will include the planting of Oak trees. Hedgerows will be managed as above and additional Criteria E1 and E2 will be satisfied, resulting in a Good condition.

Table 3.3. Summary of habitat enhancements

Enhanced Habitats					
Baseline Habitat	**Baseline Condition**	**Proposed Habitat**	**Target Condition**	**Biodiversity Units Delivered**	**Target Condition Notes**
Other Neutral Grassland	Moderate	Other Neutral Grassland	Good	23.02	Areas of retained other neutral grassland will be enhanced via the removal of species indicative of sub-optimal condition and bolster planting of new native vascular plant species. Enhancements will fulfil Criteria E and F, achieving Good condition.
Blackthorn Scrub	Moderate	Blackthorn Scrub	Good	4.13	Retained Blackthorn scrub within the centre of the site will be enhanced via the planting of adjacent scrub. A ride will be established in the middle, passing Condition Criterion E, thereby fulfilling all condition criteria and achieving Good condition.
Bramble Scrub	Condition N/A	Mixed scrub	Moderate	1.73	Bramble scrub present along the western boundary of the site will be enhanced to mixed scrub via bolster planting of native species. The scrub will likely fail Criteria B and E reaching Moderate condition.

4. Evaluation

4.1. The Principals of Evaluation

Biodiversity Net Gain – Good Practice for Development

4.1.1. CIRIA, CIEEM and IEMA have developed principles of good practice to achieve Biodiversity Net Gain. These principles provide a framework that helps improve the UK's biodiversity by contributing towards strategic priorities to conserve and enhance nature through sustainable development. There are ten principles in total, and all principles must be applied together as one approach. The ten principles are set out below.

4.1.2. **Principle 1. Apply 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 compensation 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.

4.1.3. **Principle 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.

4.1.4. **Principle 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.

4.1.5. **Principle 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.

4.1.6. **Principle 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.

4.1.7. **Principle 6. Achieve the best outcomes for biodiversity.** Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when:

- Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses.
- Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation.
- Achieving net gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels.
- Enhancing existing or creating new habitat.

- Enhancing ecological connectivity by creating more bigger, better and joined areas for biodiversity.

4.1.8. **Principle 7. Be additional.** Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).

4.1.9. **Principle 8. Create a net gain legacy.** Ensure net gain generates long-term benefits by:

- Engaging stakeholders and jointly agreeing practical solutions that secure net gain in perpetuity.
- Planning for adaptive management and securing dedicated funding for long-term management.
- Designing net gain for biodiversity to be resilient to external factors, especially climate change.
- Mitigating risks from other land uses.
- Avoiding displacing harmful activities from one location to another.
- Supporting local-level management of net gain activities.

4.1.10. **Principle 9. Optimise sustainability.** Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.

4.1.11. **Principle 10. Be transparent.** Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

Lawton's Principle

4.1.12. Principles for enhancing England's wildlife sites were developed as part of the Lawton Review[6] . Across the UK, these principles can be used to design Biodiversity Net Gain activities to boost wildlife sites. They are:

- Improving the quality of wildlife sites;
- Increasing the size of the wildlife sites;
- Enhancing connections between, or joining up wildlife sites;
- Creating new wildlife sites; and
- Reducing pressure on wildlife sites.

4.2. Post-Development Evaluation

4.2.1. The site's contribution to Biodiversity Net Gain has been assessed with due regard to the principles outlined and discussed above.

4.2.2. The landscape strategy includes a variety of habitats and will comprise new other neutral grassland and modified grassland establishment, scrub planting, biodiverse green roof and vegetated gardens, in addition to Sustainable Urban Drainage (SUDs) with associated wetland grass and aquatic planting. Species-

[6] Department for Environment, Food and Rural Affairs (2010). *Making Space for Nature: A Review of England's Wildlife Sites*, DEFRA.

rich native hedgerows, traditional orchard planting and urban tree planting will also be undertaken across the site. Focus has been had towards the retention and enhancement of habitats of greatest interest.

4.2.3. The development of the site will result in the loss of 44.90 habitat units resulting in the percentage change of -37.45%. The metric does not provide a percentage net gain for hedgerow units as no hedgerows are present in the site baseline. Nonetheless, there is an increase in hedgerow units (+5.48 units) as detailed by the metric.

Table 4.1. Summary of Statutory Biodiversity Metric Results

On-site Baseline	Habitat Units	119.91
	Hedgerow Units	0
	Watercourse Units	0
On-Site post-intervention	Habitat Units	75.01
	Hedgerow Units	5.48
	Watercourse Units	0
Total Net Percentage Gain	**Habitat Units**	**-37.45%**
	Hedgerow Units	**N/A**
	Watercourse Units	**N/A**

4.2.4. The development proposal does not achieve mandatory 10% net gain, as per the requirements of the Environment Act 2021.

4.2.5. Trading rules are also not satisfied. This is due to the loss of other neutral grassland (a medium distinctiveness habitat).

4.3. Satisfying Trading Rules

4.3.1. To satisfy the medium distinctiveness trading rule, further grassland habitat needs to be planted or alternatively a higher distinctiveness habitat established. Due to the difficulties of creating a higher distinctiveness habitat, the purchase of off-site units is therefore recommended to meet trading standards and offset any losses in habitat units.

4.4. Off-site Compensation

4.4.1. Developers should first seek to compensate for biodiversity losses on-site. If this is not possible, a mixture of on-site and off-site compensation may be used. This can include purchasing off-site land and establishing compensatory habitats within it, contacting the Wildlife Trust / other similar organisations, or by purchasing off-site credits from the private market (a habitat bank).

4.4.2. It is important to note that not all habitat bank providers have operational habitat banks in every county. It may not be possible to purchase biodiversity units in the first instance. Units may be purchased from a neighbouring county's habitat bank if one is available. This could incur additional costs, however, if the area of offsetting is further away from the site and situated within a different natural character area. As a result, the metric applies various multipliers to the calculations. The further the habitat bank is from the site, the less value habitats have within the metric, and thus more habitat may be needed to provide

compensation. Therefore, the cost of offsetting increases. This principle also applies to a developer's own land. If the land purchased is situated far from the site, more land may be required to provide compensatory habitat.

4.4.3. If the development remains short of mandatory BNG targets despite the above approaches, statutory biodiversity credits must be purchased from DEFRA. This is a last resort option and is more expensive (the reasoning for this being to ensure the off-site market is not undermined by DEFRA prices).

4.4.4. The above offsetting options can be combined, so long as the steps are followed in order. The order of steps is termed the Biodiversity Gain Hierarchy. Whichever route is taken, the off-site provider would need to manage the land for conservation, including any habitat creation or enhancement measures, for 30 years.

4.4.1. The biodiversity units required to satisfy trading rules total 54.70 habitat units. The units must derive from medium distinctiveness grassland habitat. 56.90 habitat units are required to achieve 10% net gain. Sourcing this number of units will also satisfy trading rules. When purchasing off-site units, the required number of units may increase depending on the locality to the selected habitat in relation to the development site.

4.4.2. The applicant is currently exploring options to purchase off-site compensation units through a habitat bank provider. Full details of purchased off-site units would be provided when discharging the Biodiversity Gain condition upon submission of the Biodiversity Gain Plan and Habitat Management and Monitoring Plan.

5. Summary and Conclusions

5.1. Ecology Solutions was commissioned by Burlington Property Group in July 2024 undertake a Biodiversity Net Gain (BNG) assessment of the site at Carpenders Park, Three Rivers,

5.2. The development proposal is for mixed-use with up to 256 homes, housing with care, a children's home and associated parking, open space, Sustainable Urban Drainage (SUDs), landscaping and vehicular access.

5.3. This report has been amended in response to comments received by Herts Ecology on 27 October 2025 and 26 February 2026.

5.4. The Statutory Biodiversity Metric was used to calculate the pre-development baseline units. A total of 119.91 on-site baseline habitat units, zero hedgerow units and zero watercourse units are present on-site pre-development. Ten trees within the site are considered veteran and thus irreplaceable within the BNG metric. These trees will be safeguarded and incorporated into the development proposal.

5.5. The landscape strategy includes a variety of habitats and will comprise new other neutral grassland and modified grassland establishment, scrub planting, biodiverse green roof and vegetated gardens, in addition to Sustainable Urban Drainage (SUDs) with associated wetland grass and aquatic planting. Species-rich native hedgerows, traditional orchard planting and urban tree planting will also be undertaken across the site. Focus has been had towards the retention and enhancement of habitats of greatest interest.

5.6. While retention and enhancement of the habitats considered to be of greatest value has been sought, the proposed development would result in a net loss of 44.90 habitat units. This equates to a net percentage loss of -37.45% in habitat units. The metric does not provide a percentage net gain for hedgerow units as no hedgerows are present in the site baseline. Nonetheless, there is an increase in hedgerow units (+5.48) as detailed by the metric. The development proposal does not achieve 10% BNG as mandated by the Environment Act 2021. Trading rules for habitats are also not satisfied.

5.7. In conclusion off-site compensation will be required to satisfy all trading rules and achieve a net gain of 10% to meet mandatory national and local policy requirements. The applicant will purchase the required units from a private habitat bank.

Plans

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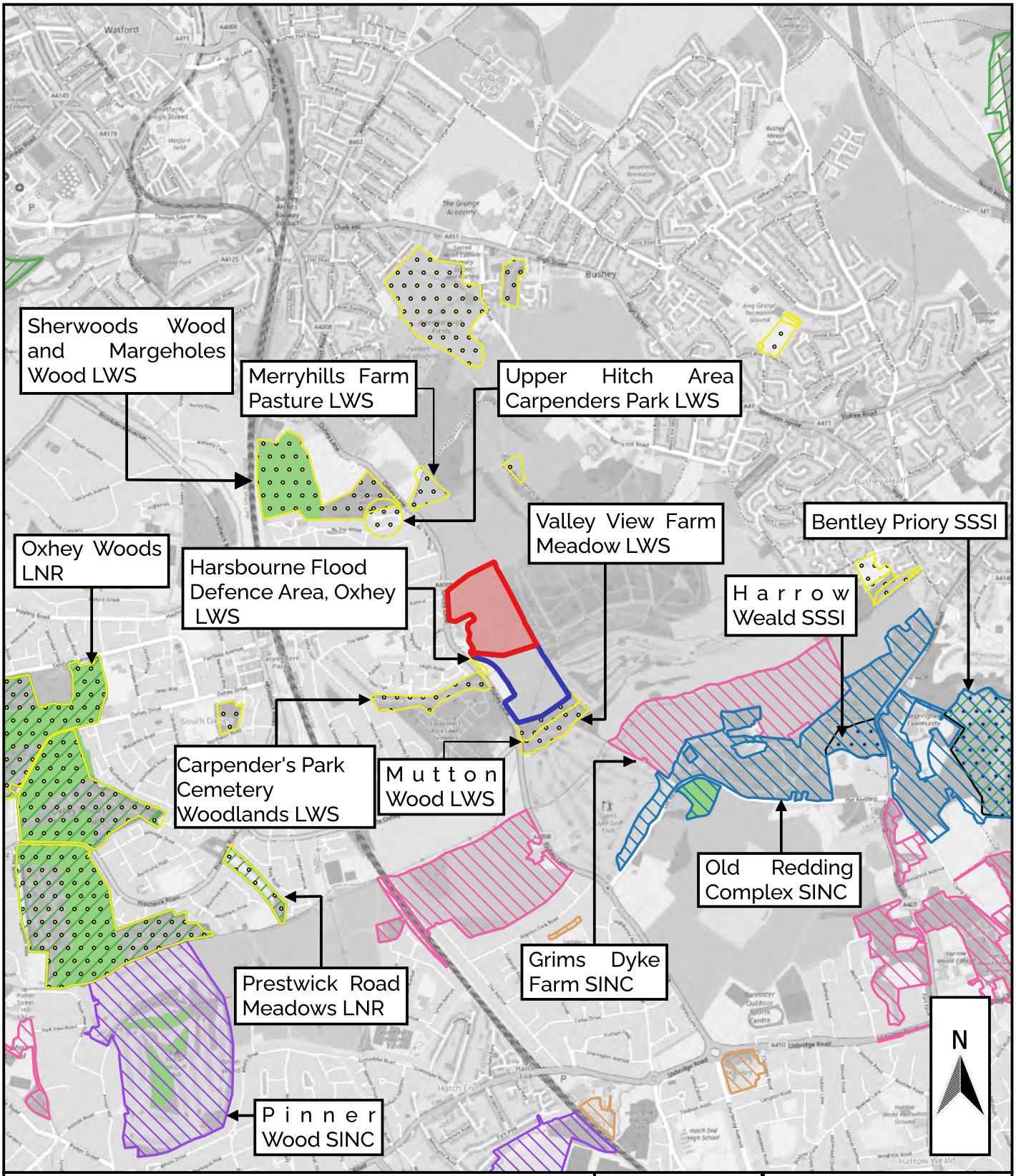
PLAN ECO1

Site Location and Ecological Designations



KEY:

- SITE BOUNDARY
- WIDER STUDY AREA
- SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)
- LOCAL NATURE RESERVE (LNR)
- LOCAL WILDLIFE SITE (LWS)

SITE OF IMPORTANCE FOR NATURE CONSERVATION (SINC)

- BOROUGH IMPORTANCE GRADE 1
- BOROUGH IMPORTANCE GRADE 2
- LOCAL IMPORTANCE
- METROPOLITAN IMPORTANCE
- ANCIENT WOODLAND

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12195: CARPENDERS PARK, THREE RIVERS

PLAN ECO1: SITE LOCATION AND ECOLOGICAL DESIGNATIONS

Rev: A

Mar 2025

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PLAN ECO2

Pre-development Habitats

KEY:

SITE BOUNDARY

HABITATS

OTHER NEUTRAL GRASSLAND

BLACKTHORN SCRUB

BRAMBLE SCRUB

LOWLAND MIXED DECIDUOUS WOODLAND

TALL FORBS

INDIVIDUAL TREES

VERY LARGE RURAL TREE

LARGE RURAL TREE

MEDIUM RURAL TREE

MEDIUM RURAL VETERAN TREE

VERY LARGE RURAL VETERAN TREE

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PLAN ECO2:
PRE-DEVELOPMENT HABITATS

Rev: B

Nov 2025

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PLAN ECO3

Post-development Habitats

KEY:

SITE BOUNDARY

HABITATS

BUILT FORM AREA.
60% DEVELOPED LAND; SEALED SURFACE;
30%VEGETATED GARDEN;
10%MODIFIED GRASSLAND

CARE HOME DEVELOPMENT.
70%DEVELOPED LAND;SEALED SURFACE;
20% VEGETATED GARDENS;
10% MODIFIED GRASSLAND

ARTIFICIAL UNVEGETATED, UNSEALED SURFACE

BIODIVERSE GREEN ROOF

BLACKTHORN SCRUB

BRAMBLE SCRUB

DEVELOPED LAND; SEALED SURFACE

LOWLAND MIXED DECIDUOIS WOODLAND

MIXED SCRUB

MODIFIED GRASSLAND

OTHER NEUTRAL GRASSLAND

OTHER WOODLAND; BROADLEAVED

SUSTAINABLE URBAN DRAINAGE SYSTEM

TRADITIONAL ORCHARD

RETAINED HABITAT

HEDGEROWS

SPECIES-RICH NATIVE HEDGEROW

SPECIES-RICH NATIVE HEDGEROW WITH TREES

INDIVIDUAL TREES

LOST RURAL TREE

RETAINED VERY LARGE RURAL TREE

RETAINED LARGE RURAL TREE

RETAINED MEDIUM URBAN TREE

RETAINED VERY LARGE RURAL TREE

RETAINED MEDIUM RURAL TREE

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PLAN ECO3:
POST-DEVELOPMENT HABITATS

Rev: C

Mar 2026

Appendices

APPENDIX1

Illustrative Landscape Masterplan
(drawing ref. P24-2204_DE_003_E_01)
(Pegasus Group)

KEY - ILLUSTRATIVE MASTERPLAN

- SITE BOUNDARY
- PROPOSED VEHICULAR ACCESS
- PROPOSED PEDESTRIAN ACCESS
- PROPOSED EMERGENCY ACCESS
- PROW
- OPEN SPACE
- PROPOSED RESIDENTIAL PARCELS
- PROPOSED LEISURE ROUTE
- PROPOSED STREETS
- PROPOSED SUDS
- EXISTING VEGETATION
- PROPOSED PLANTING
- PROPOSED ORCHARD
- PROPOSED PLAY SPACES

Issue:

N 0 50 100 m

DRAFT

LAND AT CARPENDERS PARK - ILLUSTRATIVE MASTERPLAN

PEGASUS GROUP

| PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: LT | APPROVED BY: CP | DATE: 03/03/2026 | SCALE: 1:2000@A2 | DRWG: P24-2204_DE_003_E_01 I CLIENT: BURLINGTON DEVELOPMENTS I

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APPENDIX2

Baseline Tree Condition

Appendix 2: Condition assessment of baseline trees within the Biodiversity Net Gain Statutory Metric.

Tree No.	Tree Size / Veteran	Retained or Lost	1 - Tree is native.	2 - Canopy is continuous. Individual trees automatically pass this criterion.	3 - Tree is mature.	4 - Little or no evidence of adverse impact on tree health.	5 - Natural ecological niches are present.	6 - More than 20% of canopy oversails vegetation beneath.	Condition criteria passed (out of 6)	Condition Score
1	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
2	Very Large Veteran	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
3	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
4	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
5	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
6	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
7	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
8	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
9	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
10	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
11	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
12	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
13	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
14	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
15	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
16	Medium Veteran	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
17	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
18	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
19	Very Large Veteran	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
20	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
21	Very Large Veteran	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
22	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
23	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
24	Very Large Veteran	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
25	Very Large Veteran	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
26	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good

Tree No.	Tree Size / Veteran	Retained or Lost	1 - Tree is native.	2 - Canopy is continuous. Individual trees automatically pass this criterion.	3 - Tree is mature.	4 - Little or no evidence of adverse impact on tree health.	5 - Natural ecological niches are present.	6 - More than 20% of canopy oversails vegetation beneath.	Condition criteria passed (out of 6)	Condition Score
27	Large	Lost	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
28	Very Large Veteran	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
29	Medium	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
30	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
31	Medium	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
32	Medium	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
33	Medium	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
34	Very Large Veteran	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
35	Medium	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
36	Medium	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
37	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
38	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
39	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
40	Medium	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
41	Medium	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
42	Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
43	Very Large	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
44	Very Large Veteran	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
45	Very Large Veteran	Retained	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
46	Medium	Lost	Pass	Pass	Pass	Pass	Pass	Pass	6	Good
47	Medium	Lost	Pass	Pass	Pass	Pass	Pass	Pass	6	Good

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