



## Biodiversity Net Gain Plan in support of the development proposals at 6 Hamlet Road, Haverhill, CB9 8EE.

On behalf of: Larry Dilloway

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# Introduction

This biodiversity net gain statement follows the planning application for the change of use of office to residential at Weaves 6, Hamlet Road, Haverhill, CB9 8EE.

## **Development proposals:**

- Conversion of offices to residential.

## **Does Biodiversity Net Gain Apply to this application?**

Biodiversity Net gain is a requirement set out in Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) that requires any development that would impact the biodiversity value of a site to provide a 10% uplift in biodiversity. A site impacts biodiversity if it reduces the value of any onsite habitat.

The exemptions to this requirement are set out in the Biodiversity Gain Requirements (exemptions) Regulations 2024 and are as follows;

## **De minimis exemption**

- 1) The biodiversity gain planning condition does not apply in relation to planning permission for development which meets the first and second conditions.
- 2) The first condition is that the development does not impact an onsite priority habitat.
- 3) The second condition is that the development impacts—
  - (a) less than 25 square metres of onsite habitat that has biodiversity value(3) greater than zero; and
  - (b) less than 5 metres in length of onsite linear habitat.
- 4) For the purposes of this regulation—
  - (a) “priority habitat” means a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006(4);
  - (b) a habitat is impacted where the habitat is lost or degraded such that there is a decrease in the biodiversity value of that habitat;
  - (c) “linear habitat” means the types of hedgerow habitat or watercourse habitat identified for the purposes of the biodiversity metric

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5) (which are measured by length (expressed in kilometres) rather than area).

### **Householder applications**

- 1) The biodiversity gain planning condition does not apply in relation to planning permission for development which is the subject of a householder application within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

### **High Speed Railway Transport Network**

- 1) The biodiversity gain planning condition does not apply in relation to planning permission for development forming part of, or ancillary to, the high speed railway transport network comprising connections between all or any of the places or parts of the transport network specified in section 1(2) of the High Speed Rail (Preparation) Act 2013(6).
- 2) In this regulation “transport network” and “high speed railway transport network” have the same meaning as in the High Speed Rail (Preparation) Act 2013.

### **Biodiversity gain site**

- 1) The biodiversity gain planning condition does not apply in relation to planning permission for development which is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the biodiversity gain planning condition which applies in relation to another development.
- 2) In determining whether a development is undertaken solely or mainly for the purpose specified in paragraph (1), no account is to be taken of any facility for the public to access or to use the site for educational or recreational purposes, if that access or use is permitted without the payment of a fee.

### **Self-build and custom build applications**

- 1) The biodiversity gain planning condition does not apply in relation to planning permission for development which—
  - a) consists of no more than 9 dwellings;
  - b) is carried out on a site which has an area no larger than 0.5 hectares; and
  - c) consists exclusively of dwellings which are self-build or custom housebuilding. (2) In this regulation “self-build or custom housebuilding” has the same meaning as in section 1(A1) of the Self-build and Custom Housebuilding Act 2015(7).

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Due to this application not meeting the requirements to fall under any of the above exemptions, Planning Direct has been instructed to produce this statement on behalf of Larry Dilloway.

The statement should be read in conjunction with the following documentation:

- BNG Small Site Metric,
- BNG Habitat Management and Monitoring Plan,
- BNG Landscape Plan.

## Competency

This is a statement of competency for the creation of this report and the use and completion of the BNG metric.

I have worked for Planning Direct for 18 months. I have exclusively worked on BNG Small Sites Metric work since last April (24). So, given the inception time of the small site requirement, I have as much experience as anyone else on this. I conduct all our BNG surveys, produce the plans, produce Habitat Management Plans and liaise with Lisa, our Landscape Designer, where appropriate. I also assist with Arboricultural Impact Surveys.

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## Methodology

Due to the site meeting the requirements for the use of the small site metric, Planning Direct carried out a site visit on the 9th of September 2025 to record which habitats were present on the site, alongside any individual trees. Following the site visit, the small site metric calculation tool was used to establish the value of any and all onsite habitats.

The Small Sites Biodiversity Metric 4.0 was used to calculate the pre- and post-development biodiversity values of the proposed development.

This was completed following the guidance within DEFRA's small sites metric user guide.

The information entered into the Small Sites Biodiversity Metric 4.0 calculator comprised:

- Broad Habitat;
- Habitat Type (used to determine Distinctiveness);
- Area (sq.m) OR Length (km); and
- Strategic Significance (whether the location is within the local plan (e.g. within a Biodiversity Opportunity Area) or not).

The metric is divided into three sections: area-based habitats, hedgerow linear habitats, and watercourse linear features. The overall biodiversity score of the project is taken as the lowest-scoring change among these different habitat groups.

There are no watercourse linear features present on the site, so there will be no projected impact on watercourse units. For this reason, watercourses have not been involved in the BNG calculations for this development.

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# Pre-development biodiversity on site

## **Baseline habitats**

Developed land; sealed surface - 188.78 sqm - Total habitat units onsite 0.00 - 188.78 sqm to be retained - Driveway.

Vegetated garden - 277.64 sqm - Total habitat units onsite 0.06 - 277.64 sqm to be retained - Existing office garden area.

Developed land; sealed surface - 281.32 sqm - Total habitat units onsite 0.00 - 281.32 sqm to be retained - Building including pathway around the back.

Artificial unvegetated, unsealed surface - 350.26 sqm - Total habitat units onsite 0.00 - All 350.26 sqm to be removed - Gravel parking.

2 x medium trees - to be retained.

## **Baseline hedgerow habitats**

Native hedgerow - 25m - Total units onsite 0.1000 - Full 25m to be retained - Hedgerow bordering site.



*Driveway - Site photo taken on the 9th of September 2025.*





*Office garden area - Site photo taken on the 9th of September 2025.*



*Building inc pathway - Site photo taken on the 9th of September 2025.*





*Gravel parking - Site photo taken on the 9th of September 2025.*





*Native hedgerow - Site photo taken on the 9th of September 2025.*

## Summary of pre-development biodiversity

Baseline Units	Area habitat units	0.3550
	Hedgerow units	0.1000
	Watercourse units	Zero Units Baseline

*Baseline units taken from small site metric.*

## Post-Development Biodiversity proposals

### **Habitat area creation**

Vegetated Garden - Condition assessment N/A - 350.26 sqm - Habitat units created 0.0676 - New garden area to replace gravel parking.

### **Habitat area enhancement**

There is to be no habitat area enhancement.

### **Hedgerows and Tree lines creation**

Native hedgerow - 12.80m - Moderate condition - Units created on-site 0.0428 - Borders site and new garden.

### **Hedgerows and Tree lines enhancement**

There are to be no hedgerows or tree lines enhanced.

### **Watercourse Creation**

There are to be no watercourses created.

## Summary of post-development biodiversity proposals

Post-development Units	Area habitat units	0.4226
	Hedgerow units	0.1428
	Watercourse units	0.0000

Post development units taken from the small site metric.

Total net unit change	Area habitat units	0.0676	✓
	Hedgerow units	0.0428	✓
	Watercourse units	0.0000	✓

Total net unit change taken from the small site metric.

Total net % change	Area habitat units	19.04%	✓
	Hedgerow units	42.85%	✓
	Watercourse units	% target not appropriate	✓

Total net unit change taken from the small site metric.

## Net changes

1e. Trading Summary					
Broad Habitat Type - Medium Distinctiveness Habitats		Trading Rules Satisfied ✓			
Medium and Low Distinctiveness Band		Trading Rules Satisfied ✓			
1f. Habitat trading assessment					
Broad habitat types	Distinctiveness band	Baseline units	Onsite provision	Net change	Trading satisfied?
Cropland	Low	0.0000	0.0000	0.0000	Yes
	Medium	0.0000	0.0000	0.0000	Yes
Grassland	Low	0.0000	0.0000	0.0000	Yes
	Medium	0.0000	0.0000	0.0000	Yes
Heathland and shrub	Low	0.0000	0.0000	0.0000	Yes
	Medium	0.0000	0.0000	0.0000	Yes
Intertidal hard structures	Low	0.0000	0.0000	0.0000	Yes
	Medium	0.0000	0.0000	0.0000	Yes
Intertidal sediment	Low	0.0000	0.0000	0.0000	Yes
	Medium	0.0000	0.0000	0.0000	Yes
Lakes	Low	0.0000	0.0000	0.0000	Yes
	Medium	0.0000	0.0000	0.0000	Yes
Sparsely vegetated land	Low	0.0000	0.0000	0.0000	Yes
	Medium	0.0000	0.0000	0.0000	Yes
Urban	Low	0.0000	0.0000	0.0000	Yes
	Medium	0.0000	0.0000	0.0000	Yes
Woodland and forest	Low	0.0000	0.0000	0.0000	Yes
	Medium	0.0000	0.0000	0.0000	Yes
Coastal saltmarsh	Low	0.0000	0.0000	0.0000	Yes
	Medium	0.0000	0.0000	0.0000	Yes
Individual trees	Low	0.0000	0.0000	0.0000	Yes ✓
	Medium	0.2995	0.2995	0.0000	Yes ✓
Distinctiveness band		Baseline units	Onsite provision	Net change	Trading satisfied?
Medium distinctiveness		0.2995	0.300	0.0000	Yes ✓
Low distinctiveness		0.0000	0.123	0.0076	Yes ✓
Surplus area habitat biodiversity units after offsetting low distinctiveness units				0.0076	Yes ✓

Habitat trading assessment taken from the small site metric.

## 1e. Trading Summary

Distinctiveness and Habitat Type	Trading Rules Satisfied ✓
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## 1f. Habitat trading assessment

Broad habitat type	Distinctiveness	Habitat type	Baseline units	Onsite provision	Net change	Trading satisfied?
Hedgerows and Lines of trees	Medium	Species-rich native hedgerow	0.0000	0.0000	0.0000	Yes ✓
		Native hedgerow - associated with bank or ditch	0.0000	0.0000	0.0000	
		Native hedgerow with trees	0.0000	0.0000	0.0000	
		Ecologically valuable line of trees	0.0000	0.0000	0.0000	
		Ecologically valuable line of trees - associated with bank or ditch	0.0000	0.0000	0.0000	
		<b>Sum</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	
	Low	Native hedgerow	0.0000	0.1428	0.0428	Yes ✓
		Line of trees	0.0000	0.0000	0.0000	
		Line of trees - associated with bank or ditch	0.0000	0.0000	0.0000	
		<b>Sum</b>	<b>0.0000</b>	<b>0.1428</b>	<b>0.0428</b>	
	Very low	Non-native and ornamental hedgerow	0.0000	0.0000	0.0000	Yes ✓
Surplus medium distinctiveness units to offset low and very low distinctiveness units				0.0000		
Cumulative surplus of units after offsetting low distinctiveness units				0.0428		
Cumulative surplus of units after offsetting very low distinctiveness units				0.0428		

Trading summary taken from the small site metric.

## Other Biodiversity enhancements

1 x Bird box to be placed and illustrated on the BNG landscape plan.

- House Sparrow Nest Box
- Entrance hole 32 mm diameter
- Base 150 mm x 120 mm
- Each Side 200 mm x 175 mm
- Front 175 mm x 150 mm
- Back 300 mm x 150 mm
- Roof 300 mm x 150 mm
- Design Specifications taken from the BTO organisation - cutting plan for the House Sparrow nest box.

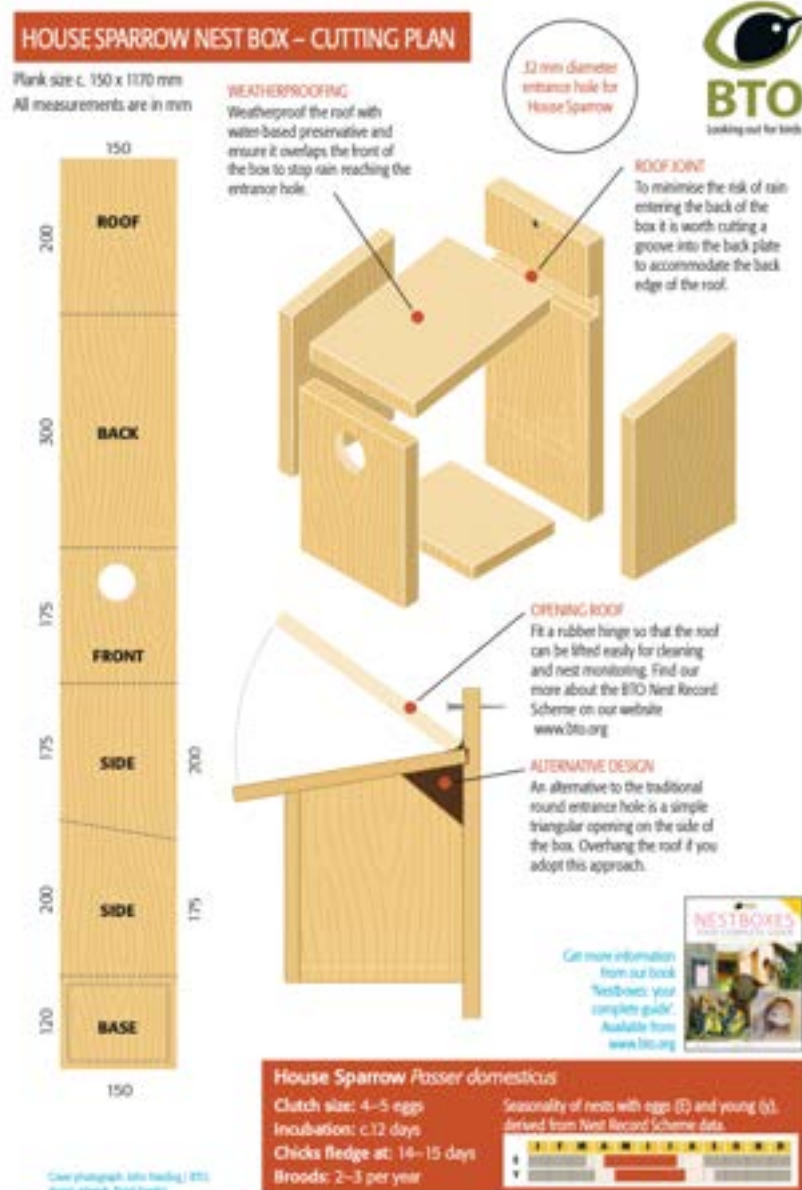
1 x Bat box to be placed and illustrated on the BNG landscape plan.

- Bats do not like draughts; the entrance slit should be no more than 15-20mm wide.
- Screwed firmly onto the tree
- Width: 170 mm



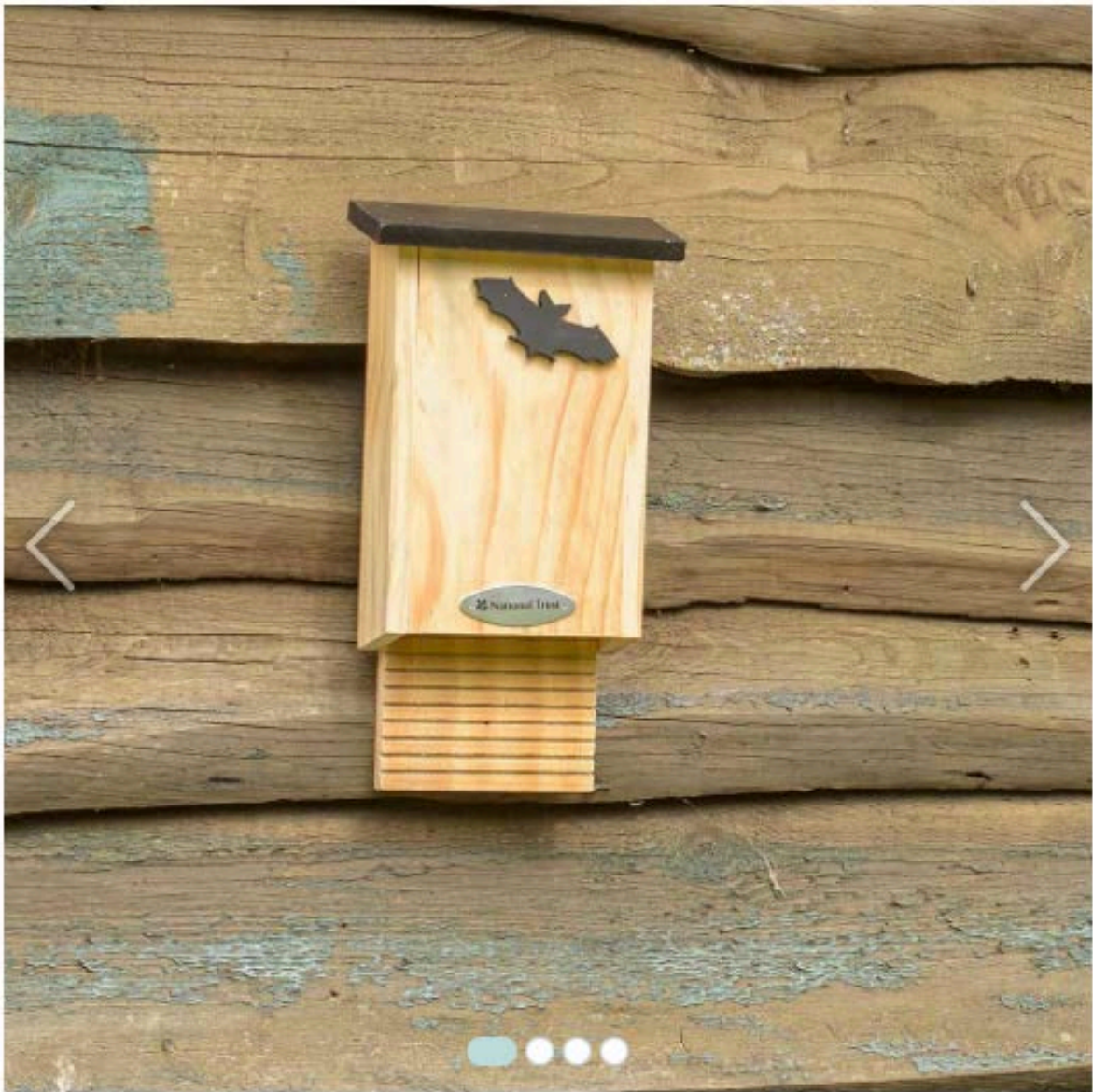
- Height: 315 mm
- Length: 75mm
- Material: Wood.

To monitor and manage both of these proposed boxes, checks will be conducted every spring and autumn to ensure there is no damage and to verify whether the boxes are housing birds or bats. If damages are present, they will be noted and fixed.



House Sparrow Nest Box taken from BTO Website.





*Natural Trust Glamis Bat Box.*

# Conclusion

In conclusion, the BNG uplift of 10% is met through the addition of a vegetated garden and a new native hedgerow. This takes the original units of 0.3550 (Habitat) and 0.1000 (Hedgerow) to 0.4226 (Habitat) and 0.1428 (Hedgerow). This is a percentage increase of 19.04%(Habitat) and 42.85% (Hedgerow), achieving the necessary BNG target.

Site Name		8 Hamlet Road, Haverhill, Suffolk, CB9 8EE	
Sheet Name		Headline Results	
Headline Results			
Headline		BNG Targets Met ✓	
Trading Rules		Trading Rules Satisfied ✓	
Next steps		Check for input errors/rule breaks present in the metric ⚠	
Baseline Units	Area habitat units	0.3550	
	Hedgerow units	0.1000	
	Watercourse units	Zero Units Baseline	
Post-development Units	Area habitat units	0.4226	
	Hedgerow units	0.1428	
	Watercourse units	0.0000	
Total net unit change	Area habitat units	0.0676	✓
	Hedgerow units	0.0428	✓
	Watercourse units	0.0000	✓
Total net % change	Area habitat units	19.04%	✓
	Hedgerow units	42.85%	✓
	Watercourse units	% target not appropriate	

Headline results taken from the small site metric.



BNG Landscape Plan