in partnership with

Denny Ecology

Construction Associates

Holywell Primary School, Needingworth, Cambridgeshire

Biodiversity Net Gain Statement

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1. Introduction

Construction of a multi-use games area (MUGA) is proposed within the existing school grounds, with most of the new footprint covering an area of a former residential bungalow and garden, which was demolished since September 2021, when the Google Earth aerial image shows it as still present. Since demolition, the area has developed into grassland, with remnants of garden shrubs and trees around the boundary. The red line boundary also includes an area of existing playground (hardstanding) which will provide access for the construction contractors, with a small section forming the northern edge of the new MUGA. The proposed layout plan is shown in Appendix 2.

To facilitate the construction, most of the grassland will be built on, and two trees will be removed. As the area proposed to be impacted is over 25 sqms, and it is a full application, the project is subject to the statutory 10% Biodiversity Net Gain (BNG) in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

A narrow perimeter of grassland around the proposed MUGA, 94 sqms in area, will be retained and enhanced. A 320 sqm area of the playing field to the rear has been included within the red line boundary to serve as a BNG enhancement area. Proposals here comprise enhancement of the grassland and planting of sixteen native trees.

As the Site is under 1ha in size, it is eligible for the use of the BNG Small sites Metric calculation tool (published 24/07/24), and this was used.

This statement presents the methods and results of the habitat survey and BNG SSM used to calculate whether the required 10% BNG can be delivered within the red-line application boundary.

I am a suitably qualified ecologist, being a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM) for 22 years, a practising ecologist for 33 years, and having a BSc in Zoology and a PhD in Ecology.

2. Site survey and assessment methodology

Habitat survey

A site visit was made by Rebecca Cattell, Consultant Ecologist, on Thursday 13th February to undertake a habitat survey of the proposed red-line site boundary, using UK Habitat methodology (UKHab 2023[1]). Habitats were assigned to UK Habitat types.

Desk study

From aerial images, it was obvious that the Site has undergone recent clearance work. As DEFRA's BNG rules require investigation as to whether a Site's BNG value has declined since 30th January 2020, if there is evidence of significant recent Site clearance, historical Google Earth images of the Site were interrogated in an attempt to categorise the habitats present on this date.

The development proposal, including habitat creation and enhancement, was superimposed onto a baseline habitat map to elucidate the area of habitats predicted to be impacted by the proposed development. Twenty randomly selected 1sqm quadrats were sampled across the grassland (ten on the playing field and 10 in the proposed MUGA footprint) for the vascular plant species present, and any dominant species were recorded.

BNG Metric calculation

We used the BNG Small Sites Metric (SSM) tool, published in July 2024, to calculate the baseline habitat value and predicted BNG as a result of the proposed development. There are no existing watercourses or hedgerows on the Site. Therefore, the target BNG was for a 10% uplift in area habitats only.

Baseline habitats were assigned to UKHab Habitat types (UKHab Ltd 2023), as required by the Statutory Metric. Areas of these habitats were measured. We then measured the habitats impacted by the proposed development, and the areas of habitats to be retained, enhanced and created

[1] UKHab Ltd (2023). UK Habitat Classification Version 2.0 (https://www.ukhab.org)

3. Results and assessment

Habitats

Existing habitats within the Site boundary at the time of survey were modified grassland and trees. Much of the area to be developed for the MUGA was a residential bungalow and associated garden which was demolished in 2021 (see Figure 1).

Paragraph 6 of Schedule 7A of the Town and Country Planning Act 1990 is an anti-avoidance provision designed to prevent a site's pre-development biodiversity value being artificially lowered through activities such as vegetation clearance. It states:

"*6. If-*

(a) a person carries on activities on land on or after 30 January 2020 otherwise than in accordance with

(i) planning permission, or

(ii) any other permission of a kind specified by the Secretary of State by regulations, and

(b) as a result of the activities the biodiversity value of the onsite habitat referred to in paragraph 5(1) is lower on the relevant date than it would otherwise have been,

the pre-development biodiversity value of the onsite habitat is to be taken to be its biodiversity value immediately before the carrying on of the activities."

In this case the pre-clearance value of the Site, dominated by buildings and vegetated garden would have been lower than the current value. As this represents an increase, not a decrease in biodiversity value since 2020, Paragraph 6 of Schedule 7A of the TCPA 1990 does not apply and the BNG baseline is set to that recorded during the site visit survey this year.

In combination, the following habitats were recorded as the baseline: hardstanding (developed land; sealed surface), modified grassland, bare ground and individual trees, as shown in Figure 3. Photos of some of these habitats are shown in Appendix 1.

Figure 1. Google Earth aerial image taken on 28th May 2020, showing the established bungalow, associated outbuildings and private garden forming much of the proposed new MUGA development Site prior to demolition and Site clearance in 2021, with the relevant part of the red line boundary included



Modified Grassland

The modified grassland forms much of the area for the proposed MUGA footprint, and the playing field to the rear, including the part within the Site boundary to be used for on-site BNG habitat delivery. This grassland was g4 modified grassland, with a permanently short sward maintained through regular mowing. There was an average of 2.6 vascular species per $m^2$and the sward was dominated by perennial rye-grass *L. perenne*.

Species recorded across the sward were (full list with DAFOR abundance code): Perennial rye-grass *L.perenne* (D), daisy *B. perennis* (A), white clover *T. repens* (A), cow parsley *Anthriscus sylvestris* (F), ribwort plantain *Plantago lanceolata* (F), and common mouse-ear *C. fontanum* (O).

Developed land; sealed surface

This is the area of existing playground to be used for access.

Bare ground

At the time of survey, the centre area of grassland proposed for the MUGA footprint was covered in a 50 sqm area of plastic sheeting weighed down with wheelie bins. The school was contacted in September, and they confirmed the plastic was still in place. Under this sheeting was bare ground as the grassland had died back due to the lack of light.

Individual trees

Two trees are located within the Site. These are a medium-sized (43cm DBH[2]) elder (numbered T6 in the accompanying tree survey report), with heavy epiphytic ivy growth, and a small (20cm DBH) native cherry (numbered T5 in the accompanying tree survey report). Both these trees will be removed to facilitate development.

The six other trees / groups (T1, T2, T3, T4, G1 & G2) included in the accompanying tree report, are located outside the Site boundary, and will not be impacted.

BNG Metric calculation

There will be loss of the following baseline habitats:

- 1no medium-sized tree
- 1no small tree
- 670 sqm of modified grassland (350 sqm MUGA area; 320 sqm playing field)
- 50 sqm of bare ground under black plastic sheeting

The 290 sqm of existing hardstanding will be retained

The proposed new/enhanced habitats are as follows:

- 306 sqm of developed land; sealed surface of the new MUGA
- 94sqm of modified grassland around the new MUGA will be enhanced to good condition modified grassland (mown wildflower lawn)
- 320 sqm of other neutral grassland in good condition in the rear playing field area (wildflower meadow, sown with Emorsgate EM2 seed mix or similar)
- 16 small native trees planted in the rear playing field area

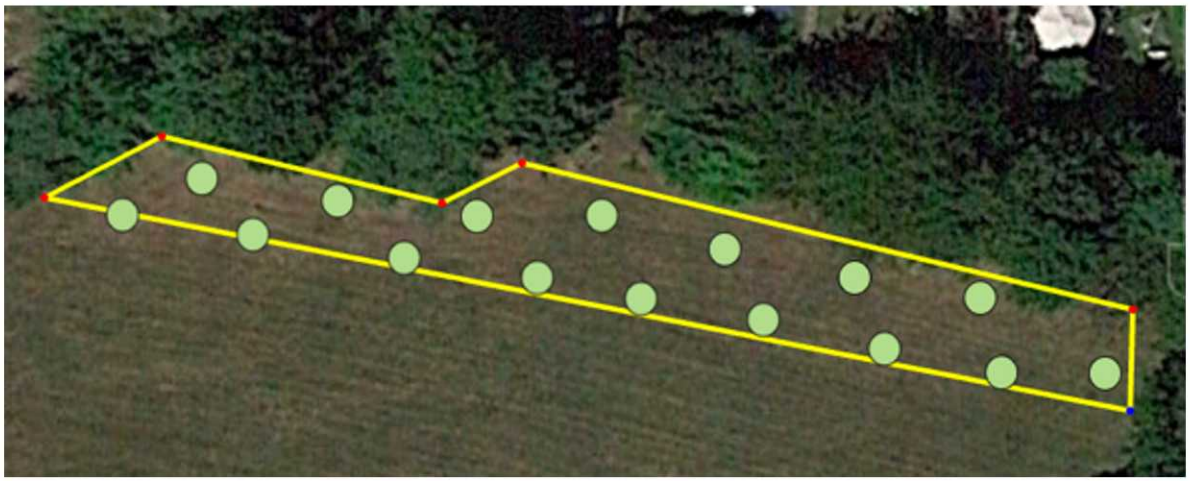
The new trees will be naturally small species, to ensure shading of the underlying grassland is minimised so its condition isn't compromised over time. Figure 2 shows the recommended distribution and spacing of the proposed tree planting, which allows 5-7m planting distance between all trees.

[2] DBH = Breast height diameter of the tree measured at 1.5m above ground level

The following species are recommended:

- 3no rowans
- 3no silver birch
- 2no crab apple
- 2no field maple
- 2no hazel
- 2no wild cherry
- 1no hornbeam
- 1no elder

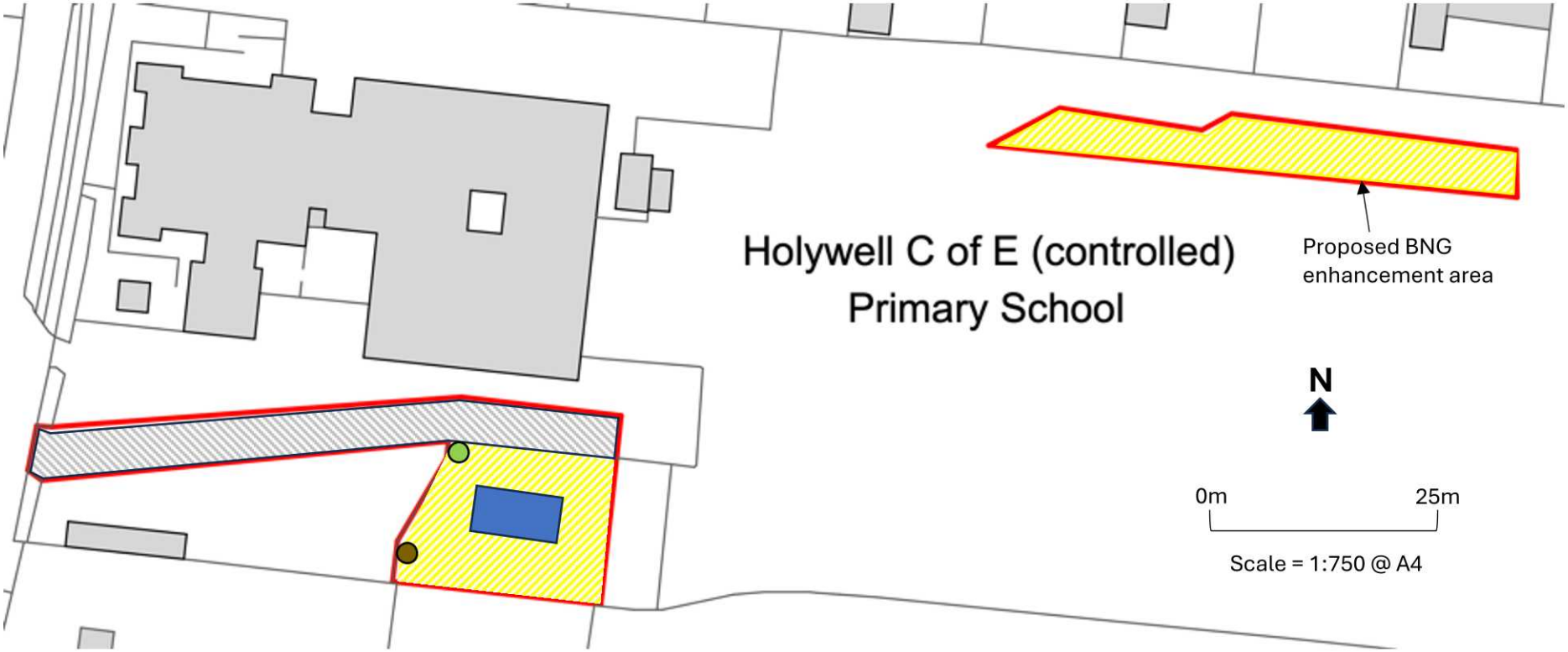
Figure 2. Recommended tree planting plan



Calculated BNG change

A summary of the BNG Metric calculation results is presented in Appendix 3. Area habitat unit values are 0.4752 at baseline (pre-development), and 0.5278 post-development, an increase of 0.0527 units, equivalent to an 11% BNG. This demonstrates that the proposed scheme has the capacity to meet the BNG targets through onsite habitat enhancement and creation.

Figure 3. UKHab Habitat map of Site on the baseline date of January 2020



Legend:

Red line = Application area boundary

Grey hatching = Developed land; sealed surface

Yellow hatching = Modified grassland

Blue shading = Bare ground under plastic sheeting

Green circle = Medium-sized tree (T6)

Brown circle = Small tree (T5)

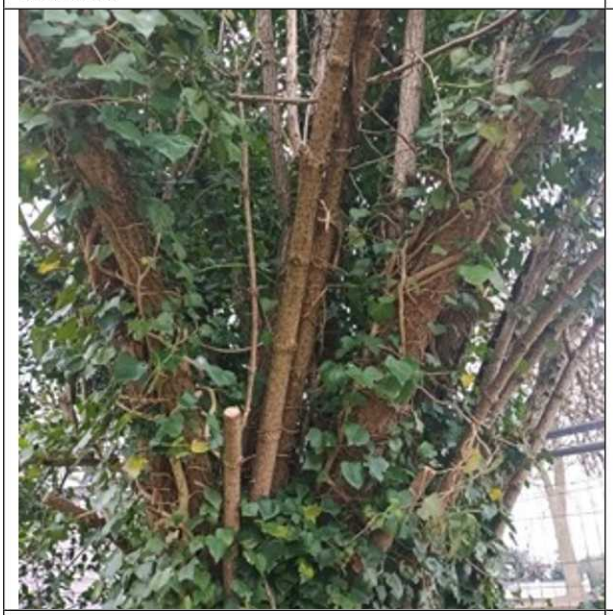
Appendix 1. Photographs of habitats on the Site



Existing modified grassland left, and existing playground to right, forming proposed MUGA development area and access



Modified grassland and bare ground on proposed MUGA footprint, with trees T5 (left) and T6 (right) to be removed in background

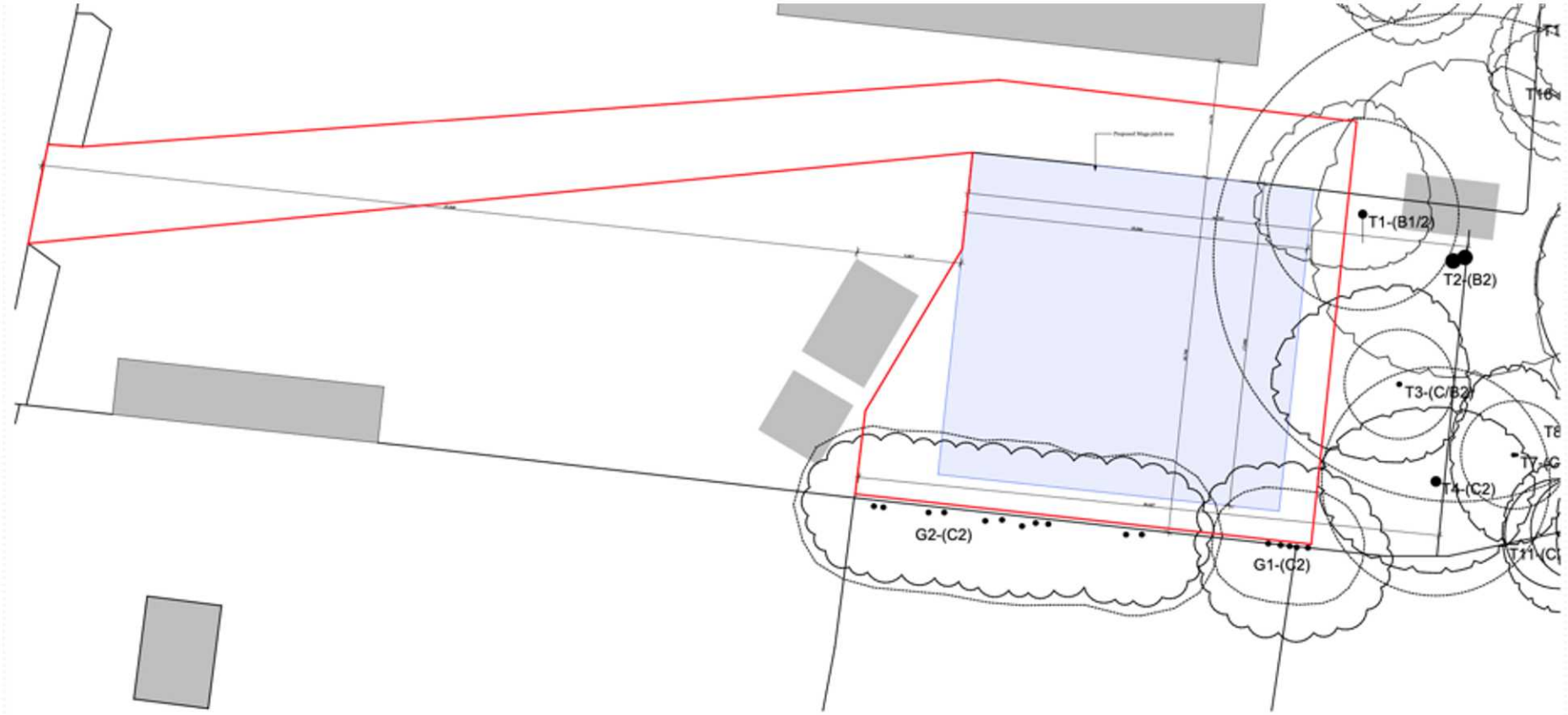


Close up of T6 multi-stemmed Elder *S. nigra,* ivy cover



Playing field g4 modified grassland, looking east

Appendix 2. Proposed MUGA development plan



Cameron Bosque Brookes Architects
Cambridge | Huntingdon | Stamford
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info@cbb-architects.co.uk

Status: Comment	Title: Proposed Site Plan
Client Name: Cambridgeshire county Council	Scale: 1:200@A3 / Date: 02/04/2025
Project Address: Holywell C of E Primary School Mill Way, Needingworth St. Ives PE27 4TF	Drawing Number: 25005-1000 / Revision: P2

Rev	Date	Drawn by	Change description
P1	12/03/2025	OB	Issued for Comment
P2	02/04/2025	OB	Tree positions updated Site area updated

0m 4m 8m 12m 16m 20m
0ft 40ft

N

General Notes
Work to figure dimensions only. All dimensions are shown in 'mm' unless otherwise stated.The contractor, sub-contractors and suppliers must verify all dimensions on site prior to the commencement of any work.This drawing is the property of Cameron Bosque Brookes Architects Limited and copyright is reserved by them. This drawing is issued on the basis that it is not copied, used or disclosed by or to any unauthorised person without the prior written consent of Cameron Bosque Brookes Architects Limited. This drawing is to be read in conjunction with all relevant engineers and specialist sub-contractors drawings and specifications. Contractors should carry out their own independent site surveys to confirm dimensions. Any discrepancies are to be brought to the designers attention.

Appendix 3. BNG SSM summary results

Site Name	Holywell Primary School, Needingworth
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	*Habitat units*	0.4752	
	Hedgerow units	Zero Units Baseline	
	Watercourse units	Zero Units Baseline	
Post-development Units	*Habitat units*	0.5278	
	Hedgerow units	0.0000	
	Watercourse units	0.0000	
Total net unit change	*Habitat units*	0.0527	✓
	Hedgerow units	0.0000	
	Watercourse units	0.0000	
Total net % change	*Habitat units*	11.08%	✓
	Hedgerow units	% target not appropriate	
	Watercourse units	% target not appropriate	

Habitats units required to meet target	0.0000
Hedgerow units required to meet target	0.0000
Watercourse units required to meet target	0.0000

