



Boningale Developments Limited

Land South of Albrighton

Biodiversity Net Gain Report

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I Summary

- 1.1.1 PJA was commissioned by Boningale Developments Limited to undertake a review of the Biodiversity Net Gain (BNG) Assessment, prepared by Beamsley Ecology (Biodiversity Net Gain (BNG) Assessment, Beamsley Ecology, December 2024), for a parcel of Land south of Albrighton, hereafter referred to as Submission 1.
- 1.1.2 This BNG Report, informed by a comprehensive review of biodiversity¹, arboricultural, topographical, landscape, drainage and flood risk data, and targeted validation of certain habitats and watercourses through site visits, presents an updated assessment. It is accompanied by the Statutory Biodiversity Metric (SBM) tool (Document Ref. STATUTORY_METRIC_CALCULATION_TOOL, August 2025), hereafter referred to as Submission 2.
- 1.1.3 Submission 2 comprises:
- The BNG Report (Document Ref. Land South of Albrighton BIODIVERSITY_NET_GAIN_REPORT, PJA, August 2025)
 - The SBM Tool (Document Ref. STATUTORY_METRIC_CALCULATION_TOOL, August 2025)
 - The SBM Condition Assessment Sheets (Document Ref. STATUTORY_BIODIVERSITY_METRIC_CONDITON_ASSESSMENT, August 2025)
 - The UK Habitat Baseline Plan (Drawing Nos. 09209-GIS-01A to 09209-GIS-01F UK Habitat Baseline, PJA, August 2025), and
 - The Habitat Creation Plan (Drawing Nos. 09209-GIS-02A to 08903-GIS-02F Habitat Creation Plan, PJA, August 2025).
- 1.1.4 Submission 2 supersedes all previous submissions related to BNG for this proposed development (namely Submission 1). This includes any earlier BNG reports, and iterations of the SBM.
- 1.1.5 The Biodiversity Gain Hierarchy (BGH) was followed through design progression and as a result, at outline stage all ponds, woodland, trees and non-priority semi-natural habitats and watercourses (also captured on Shropshire Environmental Network) appear as retained in the Landscape Masterplan. Hedgerow removal has been kept to a minimum, with proposed enhancements of retained hedgerows.
- 1.1.6 The total baseline habitat value for area habitats on the site is 113.07 units.
- 1.1.7 The total baseline for hedgerow units is 80.91 units.
- 1.1.8 The total baseline for watercourse units is 3.08 units.

¹ Raw baseline habitat data, prepared for Submission 1, were provided to PJA by the client via email.



- 1.1.9 Significant efforts were made to maximise the delivery of biodiversity units on site in line with the BGH, with a strong emphasis on retaining and proposed enhancements of existing habitats wherever possible. This approach demonstrated the viability of delivering a net gain in hedgerow units (+2.89, 3.57%) and can exceed the 10% minimum requirement for watercourses, achieving 13.00%. While a deficit of area habitat units (-7.32) remains within the red line boundary, the overall outcome demonstrates that meaningful on-site gains could be achieved and clear progress towards meeting biodiversity objectives.
- 1.1.10 Additional land outside of the red line boundary but in the Client's control² was included in the assessments to offset the deficit of units resulting from the development proposals.
- 1.1.11 The estimated total baseline habitat value for area habitats on the Blue line site is 17.67 units.
- 1.1.12 The estimated total baseline value for hedgerow units is 11.89 units.
- 1.1.13 There are no watercourses within or within 10m of the Blue line site.
- 1.1.14 The post-intervention habitat units on the Blue line site increased to 38.95, resulting on an off-site net change of 21.27 habitat units, equivalent to a 120.37% increase.
- 1.1.15 The post-intervention hedgerow units on the Blue line site increased to 19.22, resulting on an off-site net change of 7.33 hedgerow units, equivalent to a 61.67% increase.
- 1.1.16 The total net unit change for area habitat units is 13.95, equivalent to 12.34%.
- 1.1.17 The total net change for hedgerow units is 10.22 equivalent to 12.63%.
- 1.1.18 The total net change for watercourse units is 0.40 units, equivalent to 13.00%.
- 1.1.19 The figures entered in the post-development data will be confirmed once a detailed landscape scheme is available. In the absence of detailed soft and hard landscape proposals, habitat creation calculations are based on professional judgment on what is considered viable. This assessment has been undertaken to provide an indication of the scheme's capacity to deliver biodiversity net gain. The proposed habitat conditions presented are indicative and should not be regarded as final. In addition, the proposed onsite habitat enhancements are indicative and should not be regarded as final.

² As per Client's confirmation



2 Introduction

2.1 Site Information

- 2.1.1 The Site is located immediately south of the town of Albrighton, centred on Ordnance Survey Grid Reference SJ 80814 03343. It consists primarily of arable fields divided by hedgerows, with scattered trees, ponds, and three small woodland areas. Two minor roads cross the Site, and its southern boundary lies adjacent to the A41, a major highway.

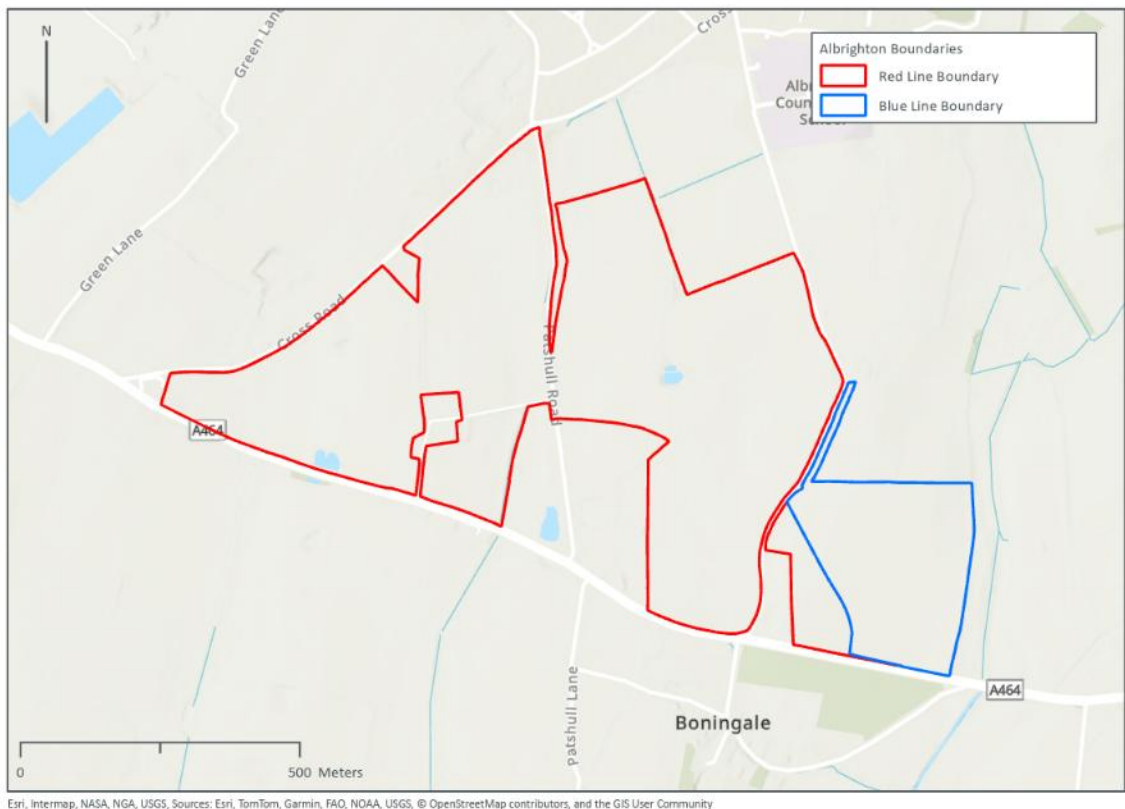


Figure 2-1: The Albrighton Site

2.2 Proposed Development

- 2.2.1 Outline application to include access for a mixed-use development comprising up to 800 no dwellings, a care home of up to 80 units, a secondary school and local centre with associated access, infrastructure, landscaping and drainage.

2.3 Biodiversity Net Gain

- 2.3.1 BNG requires development to have a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. BNG is being achieved by following the Biodiversity Gain Hierarchy (BGH) by creating and enhancing wildlife-rich habitats for a minimum



of 30 years. The BGH is a list of priority actions for development to follow to achieve BNG, including avoiding adverse effects to Very High, High and Medium-distinctiveness habitats³.

- 2.3.2 In England, BNG became mandatory for developments⁴ as of February 12th, 2024, under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). After April 2nd, 2024, this was extended to apply to small developments⁵, where they too must deliver at least 10% gain in biodiversity units.
- 2.3.3 A Biodiversity Gain Plan (BGP) must be submitted outlining how the minimum 10% gain in biodiversity will be delivered (either on-site or off-site), which must be approved by the LPA as part of the development's planning process, but before any development begins.
- 2.3.4 BNG runs alongside existing policy and legal protection of key sites, habitats and species.

2.4 Aim of this Biodiversity Net Gain Report

- 2.4.1 This BNG Report, informed by a comprehensive review of BNG⁶, arboricultural, topographical, and landscape, drainage and flood risk data, and targeted validation of certain habitats and watercourses through site visits, presents an updated assessment. It is accompanied by the SBM tool (Document Ref. STATUTORY_METRIC_CALCULATION_TOOL, August 2025), hereafter referred to as Submission 2.
- 2.4.2 Submission 2 ensures that the BNG assessment aligns with the with the Landscape Masterplan (Land at Patshull Road, Albrighton, Landscape Masterplan, DRWG:P24_0225_EN_009C, Pegasus Group, February 2025)⁷.
- 2.4.3 This BNG Report reflects a commitment to robust and transparent ecological assessment. By aligning the metric with the current Landscape Masterplan and Topographical Data, it strengthens the evidence base and provides assurance to the planning authority, consultees, and other stakeholders. This provides confidence in the provided BNG conclusions and their relevance in

³ Durkin, F., Baker, J., Hardy, M., Wheelwright, C. and White, N., 2024. Mandatory Biodiversity Net Gain in England: A Guide. Chartered Institute of Ecology and Environmental Management (CIEEM). Available at: <https://cieem.net/resource/mandatory-biodiversity-net-gain-in-england-technical-guide/>

⁴ Town and Country Planning (Development Management Procedure) (England) Order 2015, Article 2(1). Available at: <https://www.legislation.gov.uk/uksi/2015/595/article/2>

⁵ Which do not fall within the meaning of major development, as defined in Town and Country Planning (Development Management Procedure) (England) Order 2015, Article 2(1). Available at: <https://www.legislation.gov.uk/uksi/2015/595/article/2>

⁶ Raw baseline habitat data, prepared by previously appointed consultants, were provided to PJA by the client via email.

⁷ Submission 1 was based on a previous iteration of the Landscape Masterplan (Land at Patshull Road, Albrighton, P24_0225_EN_009A, 10/06/2024, Pegasus Group)



informing a sound planning decision. Furthermore, it will support the creation of a robust S106 agreement.

- 2.4.4 By comparing baseline conditions with post-development proposals, the report will provide a clear understanding of habitat retention and creation proposals and outline necessary measures to achieve a minimum of 10% BNG.
- 2.4.5 The figures entered in the post-development data will be confirmed once a detailed landscape scheme is available. In the absence of detailed soft and hard landscape proposals, habitat creation calculations are based on professional judgment on what is considered viable. This assessment has been undertaken to provide an indication of the scheme's capacity to deliver biodiversity net gain. The proposed habitat conditions presented are indicative and should not be regarded as final.

2.5 Evidence of Technical Competency & Experience

- 2.5.1 The competency and experience of the surveyor that completed the UK Habitat (UKHab) survey on the 24th, 25th and 26th February, and 26th of April 2024, on behalf of the client, is presented in Section 2 (Methodology) of the BNG assessment prepared from Beamsley Ecology (Biodiversity Net Gain Assessment, Beamsley Ecology, December 2024).
- 2.5.2 Dr Ana Togridou CEcol, MCIEEM holds a PhD in Ecology and has been practising as a professional ecological consultant in the UK since 2012. Dr Togridou has completed bespoke training on BNG provided by Chartered Institute of Ecology and Environmental Management (CIEEM) and has delivered internal and external training sessions on BNG. She has delivered CIEEM webinars on BNG and reptiles. In addition, she is the Principal Investigator of the '*Considering Reptiles When Designing for Biodiversity Net Gain*' project, which was published in December 2024 in *In Practice*, the professional magazine of CIEEM. The 'Biodiversity Net Gain and Reptiles Project' was 'Highly Commended' at the CIEEM Awards 2025 for the Category: 'Best Practice Award: Innovation'. Based on her academic qualifications, professional experience, leadership in the field, and contributions to industry best practice, Dr Ana Togridou meets and exceeds the competency requirements outlined in BS 8683:2021 for the preparation and delivery of BNG assessments.
- 2.5.3 Nicole King BSc (Hons), ACIEEM is an experienced ecologist with six years of consultancy experience, with a specialist focus on BNG. She has delivered biodiversity assessments for a range of developments, including acting as the biodiversity accounting lead for a nationally significant infrastructure project. Nicole was a co-author of the '*Considering Reptiles When Designing for Biodiversity Net Gain*' project, published in December 2024 in *In Practice*, the professional magazine of CIEEM. The 'Biodiversity Net Gain and Reptiles' Project was 'Highly Commended' at the CIEEM Awards 2025 for the Category: 'Best Practice Award: Innovation'. Based on her academic background, professional experience, leadership in biodiversity accounting, and contributions to



industry best practice, Nicole King meets and exceeds the competency requirements outlined in BS 8683:2021 for the preparation and delivery of BNG assessments.

- 2.5.4 The validating site visit and River Condition Assessment (RCA) was undertaken by Phil Playford BSc (Hons), MSc, MCIEEM, MRSB. Phil is an experienced ecological surveyor with strong specialist skills in botany, supported by formal academic qualifications and professional memberships. He has extensive experience in habitat identification, habitat classification, and is certified to conduct Modular River Physical (MoRPh) surveys as part of the RCA inputs for calculating Net Gain for rivers, streams and canals using the SBM.



3 Legislation & Guidance

3.1 The Environment Act, 2021

- 3.1.1 Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) must deliver at least a 10% BNG. This applied from the 12 February 2024 for development under the Town and Country Planning Act 1990, unless exempt. It has applied to small sites since 02 April 2024.
- 3.1.2 BNG is measured using the SBM and the extent and management of habitats will need to be secured for at least 30 years. The Environment Act 2021 emphasises sustainable development by integrating biodiversity improvements into planning policy and mandatory spatial strategies for nature known as Local Nature Recovery Strategies (LNRS).

3.2 National Planning Policy Framework, 2024

- 3.2.1 The National Planning Policy Framework (NPPF) 2024 integrates BNG as a key principle for sustainable development in England. It mandates that all new developments (with some exceptions) deliver at least a 10% net gain in biodiversity, achieved through habitat creation or enhancement.
- 3.2.2 BNG is to be measured using the DEFRA SBM and secured for a minimum of 30 years via planning conditions or obligations. The NPPF emphasizes protecting irreplaceable habitats, enhancing ecological networks, and integrating green infrastructure to support wildlife.

3.3 Natural England Standing Advice

- 3.3.1 Natural England provides standing advice for development proposals prioritises early integration of BNG into project design, focusing on creating high-quality habitats that align with local and national conservation priorities. It advocates for securing long-term gains, minimum of 30 years.

3.4 BS 8683:2021 - Process for designing and implementing Biodiversity Net Gain – Specification.

- 3.4.1 BS 8683:21 provides a step-by-step process for organisations to design and implement BNG as a measurable and transparent approach to biodiversity enhancement.

3.5 The Hedgerow Regulations, 1997

- 3.5.1 The Hedgerow Regulations aim to protect important hedgerows in England and Wales. These regulations prohibit the removal of hedgerows without prior permission from the LPA. A hedgerow is considered important if it meets specific criteria related to its age, biodiversity, historical significance, or contribution to the landscape.



3.6 CIEEM Biodiversity Net Gain: Good Practice for development⁸

- 3.6.1 CIEEM has developed a set of 10 Good Practice Principles for achieving BNG in development projects. These principles provide a framework to ensure that developments leave biodiversity in a measurably better state than before.

3.7 The Biodiversity Metric User guide⁹

- 3.7.1 The SBM User Guide (3rd July 2025) provides detailed instructions for calculating biodiversity value in development projects, ensuring compliance with the UK's mandatory BNG requirements. It outlines the metric's principles, rules, and calculation methods, including habitat size, condition, and strategic significance. The guide also addresses approaches for capturing habitat retention, enhancement, creation, and incorporating risk multipliers.

⁸ [Biodiversity-Net-Gain-Principles.pdf](#)

⁹ [The Statutory Biodiversity Metric](#)



4 Methodology

4.1 Statutory Biodiversity Metric

- 4.1.1 Habitat types used in the SBM are adapted from UKHab rather than being directly drawn from it, ensuring compatibility with the metric's specific requirements and objectives.

Distinctiveness

- 4.1.2 Each habitat type has a pre-determined distinctiveness value attributed to it within the SBM. Distinctiveness refers to the relative ecological value of a habitat type, based on its rarity and importance for biodiversity. The more unique or valuable the habitat, the higher its distinctiveness score, which means it contributes more to the overall biodiversity value of a site.

Irreplaceable Habitat

- 4.1.3 Irreplaceability of the habitat is also assessed, with irreplaceable habitats identified as those that are of exceptional ecological value and cannot be recreated or replaced if lost, such as Ancient Woodlands. These habitats are given the highest protection within the SBM assessment process, scoring highly in the metric, reflecting their critical importance for biodiversity and requiring bespoke compensation as part of the BGP.

Condition

- 4.1.4 Habitats are assessed on their condition to support biodiversity unit scores. Condition is scored based on a number of set criteria¹⁰, relating to aspects such as species richness and structural diversity.

Strategic Significance

- 4.1.5 At the time this BNG Report was written the Shropshire and Telford & Wrekin Local Nature Recovery Strategy (LNRS) had not been published. The strategic significance values for each habitat were ascertained from the desk study with checks for statutory and non-statutory designated sites, priority habitats and any locally strategically important habitats or species.
- 4.1.6 As per government advice¹¹, if a LNRS is not in place, alternative documents should be consulted to determine the strategic significance of the site. Examples include:

¹⁰ DEFRA, 2025. Statutory Biodiversity Metric Condition Assessments. GOV.UK. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

¹¹ DEFRA, 2025. Statutory Biodiversity Metric: User Guide. GOV.UK. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>



- Draft LNRS
- Local Plans and Neighbourhood Plans
- LPA Local Ecological Networks
- Tree Strategies and Woodland Strategies
- Area of Outstanding Natural Beauty Management Plans
- Biodiversity Action Plans (BAPs)
- Species conservation and protected sites strategies
- Green Infrastructure Strategies
- River Basin Management Plans
- Catchment Plans and Catchment Planning Systems
- Shoreline management plans
- Estuary Strategies

- 4.1.7 Shropshire Council has demonstrated exceptional leadership and commitment in developing the Draft LNRS for the Shropshire and Telford & Wrekin area. Their proactive approach to biodiversity enhancement and habitat restoration reflects a strong dedication to environmental stewardship and sustainable land use planning.
- 4.1.8 Through extensive collaboration with key stakeholders, including Natural England, local wildlife trusts, landowners, and community groups, the Council has ensured that the Draft LNRS development is inclusive, evidence-based, and strategically focused.
- 4.1.9 A review of the relevant planning and environmental documents to assign strategic significance to habitats for BNG purposes within Shropshire was undertaken. This review ensured that habitat assessments align with established local and regional frameworks.
- 4.1.10 A review of the Shropshire Environmental Network (SEN) identified the presence of non-priority semi-natural habitats and watercourses within the scheme extent.
- 4.1.11 The Shropshire BAP includes hedgerows and semi-mature broadleaved woodlands as key habitats.
- 4.1.12 Following the review of the relevant local plans, it was determined that hedgerows comprising at least 80% native woody species and measuring a minimum of 20 metres in length should be assigned the strategic significance category 'Location ecologically desirable but not in local strategy'. Ponds, culverts, watercourses and ditch recognised in the SEN were also assigned the strategic significance category 'Location ecologically desirable but not in local strategy'. These habitats provide corridors acting as ecological linkage to other strategically significant locations, interpreted as 'core' in the SEN mapping.



4.2 Statutory Biodiversity Metric Principles and Rules

4.2.1 Natural England advise that the SBM is a tool that helps inform plans and decisions, by using habitats as a proxy for measuring biodiversity value. When designing for BNG, the biodiversity metric rules should be followed⁸. These are:

- **Rule 1:** The trading rules of this biodiversity metric must be followed.
- **Rule 2:** Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.
- **Rule 3:** To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the BNG objective has been met.
- **Rule 4:** In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

4.2.2 To inform the use of the SBM the biodiversity metric principles should be used. These are:

- **Principle 1:** The metric assessment should be completed by a competent person.
- **Principle 2:** The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.
- **Principle 3:** This biodiversity metric should be used in accordance with established good practice guidance and professional codes.
- **Principle 4:** This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
- **Principle 5:** Biodiversity units are a proxy for biodiversity and should be treated as relative values.
- **Principle 6:** This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.
- **Principle 7:** Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
- **Principle 8:** Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.



- **Principle 9:** The biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to:
 - (a) maintain habitat extent - supporting more, bigger, better and more joined up ecological networks
 - (b) ensure that proposed or retained habitat parcels are of sufficient size for ecological function

4.3 Presentation of Area and Unit Values

- 4.3.1 To aid transparency and consistency throughout this report, it is important to clarify the approach taken when presenting numeric values associated with habitat areas and biodiversity units.
- 4.3.2 The SBM tool operates using area inputs to four decimal places (4.d.p), with totals and unit outputs rounded to two decimal places (2.d.p) in the summary sheets and outputs. As a result, minor discrepancies may arise between the values displayed in this report and those seen within the Metric due to differences in rounding behaviour at various stages of calculation.
- 4.3.3 To avoid introducing confusion, all final totals or results of calculations presented within this Report have been taken directly from the SBM rather than re-calculating them from rounded inputs. This ensures continuity between this Report and the SBM submission.
- 4.3.4 Where such discrepancies may appear, for example, where a table provided as part of this Report may appear to ‘miscalculate’ by a margin of 0.01 units, these instances are not the result of typographical errors or miscalculation. They are a reflection of how the SBM handles rounding internally. For ease of reference and to aid clarity, any such values taken directly from the SBM output and which may not appear to reconcile arithmetically with table contents will be marked with an asterisk (*), with this explanatory note serving as reference.

4.4 Baseline Habitat Verification

- 4.4.1 The raw habitat baseline data¹² (comprised of spatial extents captured in the field and habitat descriptions) were reviewed against the topographical survey data and the findings of the arboricultural assessment. As part of this verification process, habitat extents were aligned against the topographical survey data, ensuring that the baseline habitats and proposed development are reported with the same spatial parameters. This ensures that reported lengths and extents and provide a precise baseline for future monitoring¹³.

¹² Raw habitat baseline data, collected for Submission 1 by other consultants, were provided to PJA by the client via email.

¹³ Using the topographical survey as the primary determining factor. Further validation of feature extents may be required ahead of full planning. For consistency across deliverables, the topographical survey has been assumed to be spatially accurate, rather than the locations shown within the raw data information.



- 4.4.2 As part of the habitat areas verification exercise, the location and extent of hedgerows were addressed first, as these formed the key boundary features upon which the extents of area-based habitats were determined. The alignment and length of hedgerows were primarily guided by the topographical and arboricultural survey, with adjustments made to ensure accuracy. Where hedgerows intersected, they were split at nodes in accordance with the Hedgerow Survey Handbook 2nd Edition (Defra, 2007). Gaps greater than 20m were treated as a trigger for defining a new hedgerow length, while access points for farmers or property owners were considered nodes rather than gaps. All hedgerows included within the current assessment represent features located within or along the perimeter of the Red Line boundary. As a result of this process, additional hedgerow lengths were identified, and the verified hedgerow network informed the delineation of associated polygon habitat features, including woodlands and ponds, which were refined using canopy extents and topographical “bank” data respectively¹⁴.
- 4.4.3 As part of the review, checks were made to ensure alignment between the Landscape Masterplan, arboricultural assessments and the spatial extent of the scheme. Post-development data were reviewed and interpreted as necessary¹⁵.
- 4.4.4 A review of the baseline and development proposal in relation to the redline boundary was undertaken, ensuring consistency across the dataset and verifying that the data accurately aligned with the defined site extents. This step included a review to confirm that there were no unintended gaps or overlaps in habitat mapping and that all areas were appropriately attributed in accordance with the boundary. This process covered both area-based habitats and linear features, including hedgerows.
- 4.4.5 The SBM metric includes only those features that fall within the redline boundary or fall within the riparian zone encroachment category, in line with current BNG guidance so that they are deliverable through any future HMMP or S106 tied to the development footprint.
- 4.4.6 To ensure consistency with between the baseline and proposed development, all habitat features were assessed in relation to the 25m² Minimum Mapping Unit (MMU). Where features fell below the 25m² MMU and were adjacent to larger habitats of compatible type, these were merged to reflect a realistic representation.

¹⁴ This approach may result in an overestimation of pond size which will need to be refined at full planning stage.

¹⁵ As an example, H02 that will be retained is listed in the masterplan as line of trees, this has been interpreted as retained hedgerow in the BNG Habitat Creation Plan.



- 4.4.7 The baseline habitats and habitat condition assessments prepared for Submission 1¹⁶ were reviewed. Additional targeted data was collected through focused site visits, and the arboricultural assessments were cross-referenced with these findings, with data updated accordingly.
- 4.4.8 The objective of the validation targeted site surveys undertaken in July 2025, was not to establish a new baseline, but to confirm that the habitat classifications and condition assessments remained appropriate. The survey followed the UKHab Classification Methodology (UKHab V2¹⁷) which provides a standardised approach to classify and map habitats across the United Kingdom. UKHab is the industry standard survey method used when determining habitat descriptions, utilising a code classification system to comprehensively classify habitats and provide a consistent basis for identifying and recording habitat communities. The survey focused on completing a habitat river condition assessment, assessing the condition of ditches on and adjacent to the Site, and verifying the condition of other neutral grassland and mixed scrub habitats.
- 4.4.9 Baseline tree data were reviewed against the arboricultural assessment ensuring alignment. Diameters determining tree size were taken directly from the arboricultural assessment¹⁸.
- 4.4.10 The topographical data did not capture field margins; therefore, a precautionary approach was applied by adding a uniform buffer to all arable fields. These areas were subsequently classified and confirmed as arable field margins – tussocky.

4.5 Development Proposals - Landscape Masterplan

- 4.5.1 The Landscape Masterplan information on development proposals and habitats, including retention and creation, (Land at Patshull Road, Albrighton, Landscape Masterplan, DRWG:P24_0225_EN_009C, Pegasus Group, February 2025 – Appendix A) and watercourse, ditches and culvert information from the Topographical Data (Drawing Number: 24006-P-1 rev 4 Albrighton (Boningale Homes) 2d.dwg) was exported to the SBM.
- 4.5.2 Proposed enhancements of retained habitats within the Red line boundary are indicative and will be re-assessed once detailed landscape proposals are available.

¹⁶ The baseline habitat conditions referenced within this assessment were derived from the user comments provided in the *SBM* dated 20.06.2024. Additional clarifications regarding these data were subsequently provided through email correspondence.

¹⁷ [UKHab – UK Habitat Classification](#)

¹⁸ Retained trees are recorded as rural trees. Given that there is no difference in distinctiveness between rural and urban tree categories, this approach was considered appropriate and does not affect the overall outcomes of the assessment.



- 4.5.3 As Soft Planting details were not available at outline stage, conditions assigned to post-development habitats are indicative¹⁹.

Classification of “On-Plot” Areas

- 4.5.4 The classification of on-plot areas associated with private dwellings, has been categorised in accordance with SBM guidance as either:
- ‘Urban – Developed land; sealed surface’ (e.g. buildings, garages, footpaths, and driveways) or,
 - ‘Urban - Vegetated garden’.
- 4.5.5 As detailed plans are not available at outline stage, a default 70:30 ratio for ‘urban – developed land; sealed surface’ to ‘urban-vegetated garden’ was applied.
- 4.5.6 This ratio did not account for access roads and public open spaces.
- 4.5.7 No provision of hedgerow or watercourse features was made at the On-Plot Areas.

Secondary school, local centre and care home

- 4.5.8 As the detailed designs of the secondary school, local centre, and care home are not available at outline stage, the post-development habitats have been classified as ‘urban – developed land; sealed surface’.
- 4.5.9 No provision of hedgerow or watercourse features was made at the secondary school, local centre, and care home.

Assessment of Proposed Trees

- 4.5.10 A detailed review of the proposed individual trees was undertaken to confirm their appropriate representation within the SBM.
- 4.5.11 As soft planting details are not available at outline stage, all proposed trees were considered urban small trees in the metric. Those trees identified as street trees, their condition was assigned as ‘moderate’ condition while featured trees and trees within an orchard were assigned ‘good’ condition.

4.6 Off-site baseline and post-development creation

- 4.6.1 Additional land outside of the red line boundary but in the Client’s control (shown as Blue line boundary in Figure 2-1) was included to offset the deficit of units resulting from the development

¹⁹ This assessment has been conducted as an indicator of the feasibility of the scheme to deliver biodiversity net gain. The proposed habitat values are not final.



proposals. It should be noted that the blue line boundary shown in Figure 2-1 is indicative and satisfactory on the basis that all assumptions made within this BNG assessment will be achieved.

- 4.6.2 A precautionary approach²⁰ was applied to the baseline habitats and hedgerows present on this site. The site comprises cropland, arable field margins, and hedgerows. The same methodology of baseline verification used within the red line boundary was also adopted here.
- 4.6.3 As no arboricultural surveys were undertaken within the Blue line, baseline data were taken directly from previous PEA assessments²¹ from Submission 1. For Hedgerows 42a, 42b and 43 where condition was not provided in Submission 1, 'good condition' was applied. The post-development scenario has been designed pragmatically, retaining part of the habitat as cropland to support the creation of larger tussocky arable field margins. The proposals also include the creation of a new hedgerow and areas of neutral grassland with scattered trees.

4.7 Phased Development

- 4.7.1 For the purposes of this assessment, it has been assumed that all project phases will be implemented independently. Habitat clearance will therefore only occur within each relevant phase, and it is assumed there will not be a situation where clearance is undertaken in later phases while earlier phases are still under construction. This approach ensures that habitats are only considered lost at the point of clearance, and it is on this basis that no advance or delay factors have been applied to the enhancement or creation entries within the SBM. This assumption ensures that no habitats are removed prematurely, and that losses are accounted for only at the point of clearance.
- 4.7.2 At the time of this submission, the duration of phasing was unknown. Future adjustments might be required to the advance and delay indicators to reflected phasing durations.
- 4.7.3 Habitat creation and enhancement located within the blue line boundary is assumed to be delivered at the outset of the scheme alongside Phase 1. On this basis, no advance or delay risk multipliers have been applied to these areas at this stage.
- 4.7.4 Where it is not possible to deliver habitat creation or enhancement in advance, the expectation is that delivery will occur alongside each corresponding project phase. This approach ensures that biodiversity compensation is provided without undue delay.

²⁰ Further validation of feature extents, hedgerow descriptions and conditions will be required.

²¹ Arable field margins were added on a precautionary basis.



5 Biodiversity Net Gain Assessment

- 5.1.1 The baseline habitats are detailed in the UK Habitat Baseline Plan (Appendix B). This plan supports the biodiversity assessment and provides a detailed representation of habitat types in accordance with the UKHab Classification system.
- 5.1.2 This BNG Report accompanies the SBM submission (Document Ref. STATUTORY_METRIC_CALCULATION_TOOL, August 2025) to the LPA.
- 5.1.3 The BGH was followed through design progression and as a result, at outline stage all ponds, woodland, trees and non-priority semi-natural habitats and watercourses (captured on SEN) appear as retained in the Landscape Masterplan. Hedgerow removal has been kept to a minimum, with proposed enhancement of retained hedgerows.
- 5.1.4 The total baseline habitat value for area habitats on the site is 113.07 units.
- 5.1.5 The total baseline for hedgerow units is 80.91 units.
- 5.1.6 The total baseline for watercourse units is 3.08 units.
- 5.1.7 Significant efforts were made to maximise the delivery of biodiversity units on site in line with the BGH, with a strong emphasis on retaining and enhancing existing habitats wherever possible. This approach demonstrated the viability of delivering a net gain in hedgerow units (+2.89, 3.57%) and can exceed the 10% minimum requirement for watercourses, achieving 13.00%. While a deficit of area habitat units (-7.32) remains within the red line boundary, the overall outcome demonstrates that meaningful on-site gains could be achieved and clear progress towards meeting biodiversity objectives.
- 5.1.8 The estimated total baseline habitat value for area habitats on the blue line site is 17.67 units.
- 5.1.9 The estimated total baseline value for hedgerow units is 11.89 units.
- 5.1.10 There are no watercourses within or within 10m of the Blue line site.
- 5.1.11 The post-intervention habitat units on the blue line site could increase to 38.95, resulting on an off-site net change of 21.27 habitat units, equivalent to a 120.37% increase.
- 5.1.12 The post-intervention hedgerow units on the Blue line site could increase to 19.22, resulting on an off-site net change of 7.33 hedgerow units, equivalent to a 61.67% increase.
- 5.1.13 The total net unit change for area habitat units is 13.95, equivalent to 12.34%.
- 5.1.14 The total net change for hedgerow units is 10.22 equivalent to 12.63%.
- 5.1.15 The total net change for watercourse units is 0.40 units, equivalent to 13.00%.



- 5.1.16 In the case that proposed enhancement and creation are achieved as outlined in this report, Trading rules will be satisfied (as shown in the SBM (Document Ref. STATUTORY_METRIC_CALCULATION_TOOL, August 2025)).
- 5.1.17 At the time of this submission, it was understood that the development will proceed in phases. As phasing is currently unknown, the delay and in advance indicators in the SBM were left as 0, this will need to be updated once phasing information becomes available.
- 5.1.18 Table 5-1 presents a summary of change in biodiversity units, pre- and post- development by habitat group and type.

Table 5-1: Pre- and Post-development change in biodiversity units

	On-site Baseline	On-site Post-Development	On-site net change
Habitat Units	113.07	105.75	-7.32 (-6.47%)
Hedgerow units	80.91	83.80	2.89 (3.57%)
Watercourse units	3.08	3.48	0.40 (13%)
	Off-site Baseline	Off-site Post-Development	Off-site net change
Habitat Units	17.67	38.95	21.27 (120.37%)
Hedgerow units	11.89	19.22	7.33 (61.67%)
Watercourse units	0.00	0.00	0.00 (0%)
	Total Net Unit change		Total net % change
Habitat Units	13.95		12.34%
Hedgerow units	10.22		12.63%
Watercourse units	0.40		13%

- 5.1.19 The submission of the pre-development and post-development biodiversity value detailed within the SBM titled STATUTORY_METRIC_CALCULATION_TOOL should be read in conjunction with this BNG Report.
- 5.1.20 The Statutory metric condition assessments of baseline habitats is detailed within the excel document titled STATUTORY_BIODIVERSITY_METRIC_CONDITON_ASSESSMENT²².

²² Surveyors' details for initial assessments were taken from the relevant PEA and BNG documents previously submitted for this scheme as per client's instruction.



- 5.1.21 At outline stage, this BNG Report demonstrates how the proposed development can deliver a measurable and policy-compliant BNG on the basis that all assumptions made within this BNG assessment will be achieved, in accordance with national guidance and the biodiversity metric trading rules.
- 5.1.22 At the time of this submission, no degradation of habitat has taken place reducing the biodiversity value of the site.
- 5.1.23 No irreplaceable habitat (as set out in column 1 of the Schedule of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations {2024}) is present on site.
- 5.1.24 The proposed development has been progressed in accordance with the BMH, which promotes a stepwise approach to avoiding, minimising, restoring, and where necessary, compensating for biodiversity impacts.
- 5.1.25 The proposed on-site habitat creation has been designed to be proportionate and appropriate to both the operational function of the site and the wider context within Shropshire's planning framework, including local requirements for green infrastructure.
- 5.1.26 The proposed post-development habitats are detailed in the Habitat Creation Plan (Appendix C). It presents the Habitat Management Areas and provides a summary of the types of these areas. The drawings should be read in conjunction with the Landscape Masterplan and the Habitat Reference Column in the On-Site and Off-Site Creation and enhancement tabs of the STATUTORY_METRIC_CALCULATION_TOOL.
- 5.1.27 Proposed post-development habitat condition targets, together with the management actions required to achieve them, will be detailed in the HMMP. The HMMP will form a key mechanism for delivering and evidencing the biodiversity objectives of the Scheme in accordance with Statutory BNG requirements.

5.2 BNG and protected species

- 5.2.1 The proposed development has been designed in accordance with the ecological and BMH, on avoiding impacts through the retention of a substantial proportion of existing features of high biodiversity value, relative to the site context. Whilst having been designed to deliver measurable biodiversity gains and to ensure that opportunities for protected and priority species are maintained and supported in the long term.
- 5.2.2 A key principle of the proposed design approach includes the deliberate retention of hedgerows, lines of trees, area of shrub, woodland and ponds. Alongside this, the proposed development incorporates a series of new habitats and green infrastructure features that can contribute positively to BNG outcomes and support a range of wildlife.



- 5.2.3 Proposed habitat creation within the scheme should explore species-rich grassland and meadow planting, woodland with a shrub understorey, an orchard, and areas of good quality semi-improved grassland. These habitats should be promoted as they complement existing ecological features and could provide diverse resources for birds, bats, amphibians, and small mammals. Wildlife meadows and rough grassland areas could support invertebrates and provide foraging opportunities for bats and birds, while also offering cover and nesting potential for small mammals and ground-nesting birds.
- 5.2.4 Sustainable Drainage Systems (SUDS) are proposed as part of the landscape design. A design with shallow, vegetated margins and gradual gradients could allow colonisation by native wetland flora and provide habitat for amphibians. The design of these features could also support seasonal use by birds and invertebrates and can contribute to the overall ecological connectivity of the site.
- 5.2.5 New planting along the site boundaries and within green corridors should include native hedgerows, woodland with a shrub understorey, and fruit-bearing trees to increase structural diversity and seasonal food availability. These corridors could also act as commuting routes for bats and other mobile species. The proposed inclusion of orchard habitats could add further value by providing flowering and fruiting resources, supporting pollinators and birds throughout the year.
- 5.2.6 In addition to habitat creation, targeted measures for protected species should be implemented. Nesting and roosting opportunities should be incorporated through the provision of bird boxes and bat boxes installed on retained trees and integrated into new buildings. These features should be carefully positioned to reflect species-specific requirements and local conditions.
- 5.2.7 Overall, the proposed design of the development should ensure the protection of existing features of high biodiversity value, while delivering a network of new, high-quality habitats. These measures can support local biodiversity, contribute to landscape-scale ecological resilience, and achieve a net gain for biodiversity in accordance with current legislation and best practice guidance.



6 Overall Biodiversity Net Gain Plan & Habitat Management and Monitoring Plan

- 6.1.1 In accordance with Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Applicant hereby confirms that they believe that, if planning permission is granted, the proposed development would be subject to the biodiversity gain condition as set out in Schedule 7A of the Town and Country Planning Act 1990.
- 6.1.2 Significant enhancements are areas of habitat enhancement or creation that contribute significantly to the proposed development's BNG, relative to the biodiversity value before development. As per government's advice²³ these would normally be:
- 1 Habitats of medium or higher distinctiveness in the biodiversity metric,
 - 2 Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development,
 - 3 Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development,
 - 4 Areas of habitat creation or enhancement which are significant in area relative to the size of the development, and
 - 5 Enhancements to the habitat condition, for example from poor or moderate to good
- 6.1.3 A Section 106 agreement will be required to secure the delivery and long-term management of the necessary biodiversity units in the blue line boundary and potential significant enhancements within the red line boundary. An overall BNG Plan and a HMMP will be submitted following the grant of planning permission.

²³ [Make on-site biodiversity gains as a developer - GOV.UK](#)



7 References

- 7.1.1 Albrighton South Arboricultural Assessment (FPCR, June 2024)
- 7.1.2 Biodiversity Net Gain (BNG) Feasibility Assessment – Land South of Albrighton, Beamsley Ecology, December 2024.
- 7.1.3 Landscape Masterplan (Land at Patshull Road, Albrighton, Landscape Masterplan, DRWG:P24_0225_EN_009C, Pegasus Group, February 2025)
- 7.1.4 Preliminary Ecological Appraisal Report – Land South of Albrighton (Cass Design Consultants Ltd, April 2024)
- 7.1.5 Statutory biodiversity metric (Land South of Albrighton, 4 December 2024)
- 7.1.6 Statutory biodiversity metric (Land South of Albrighton, 20 June 2024)
- 7.1.7 Tree Survey Plan (Drawing number: 12322-T-01, FPCR, April 2024)
- 7.1.8 Topographical Data (Drawing Number: 24006-P-1 rev 4 Albrighton (Boningale Homes) 2d.dwg)
- 7.1.9 Preliminary Ecological Appraisal Report – Land South of Albrighton (Cass Design Consultants Ltd, June 2024). Provided to PJA via email.
- 7.1.10 Albrighton Raw Data (Received via email on 16 July 2025)



