



Biodiversity Net Gain Assessment

PRESENTED TO

Dave Fisk

Pound Farm, London Road, St Ippolyts, SG4 7NE

May 2026

Applicant	Dave Fisk
Project Title	Pound Farm, London Road, St Ippolyts, SG4 7NE
Document Title	Biodiversity Net Gain Assessment

Revision	Status	Author(s)	Reviewed	Approved	Issue Date
0.0	Draft for internal Review	BL <i>Principal Ecologist</i>	KH <i>Partner</i>	-	-
1.0	Draft for Client	BL <i>Principal Ecologist</i>	KH <i>Partner</i>	KH <i>Partner</i>	15.05.2026

TABLE OF CONTENTS

LIST OF TABLES	ii
LIST OF FIGURES.....	ii
1 INTRODUCTION	1
1.1 SITE DESCRIPTION AND PROPOSED DEVELOPMENT	1
1.2 QUALITY ASSURANCE AND COMPETENCE	1
2 RELEVANT LEGISLATION AND POLICY OVERVIEW	2
2.1 THE ENVIRONMENT ACT.....	2
2.2 NATIONAL PLANNING POLICY FRAMEWORK (2024)	2
2.3 BIODIVERSITY NET GAIN HIERARCHY	2
3 METHODOLOGY	3
3.1 BIODIVERSITY NET GAIN ASSESSMENT	3
3.2 BASELINE SURVEY.....	3
3.3 CONDITION ASSESSMENT.....	3
3.3.1 <i>Existing Habitat Conditions</i>	3
3.3.2 <i>Proposed Habitat Conditions</i>	4
3.4 BIODIVERSITY NET GAIN CALCULATIONS	4
3.5 LIMITATIONS	4
4 RESULTS	5
4.1 BASELINE CONDITIONS	5
5 POST-DEVELOPMENT HABITATS ASSESSMENT	7
6 BIODIVERSITY NET GAIN CALCULATIONS	9
7 POST-DEVELOPMENT HABITAT MANAGEMENT GUIDANCE	9
8 CONCLUSION	10
9 REFERENCES	11
APPENDIX I – FIGURES	12
APPENDIX II – SITE PHOTOGRAPHS.....	16
APPENDIX III – CONDITION ASSESSMENT.....	19

LIST OF TABLES

Table 1: On-site baseline habitat results.....	6
Table 2: Potential on-site post-development habitat areas created.	8
Table 3: Biodiversity net gain headline metric results	9

LIST OF FIGURES

Figure 1: Site Location Plan.	13
Figure 2: Baseline Habitat Plan.	14
Figure 3: Proposed Site Plan (TAS Architects, 2026).....	15

1 INTRODUCTION

Growing Native were instructed by Aitchison Raffety Property Consultants on behalf of Dave Fisk to undertake a Biodiversity Net Gain (BNG) Assessment of the land and stables at Pound Farm, London Road, St Ippolyts, SG4 7NE, hereafter referred to as the 'Proposed Development' or 'Site', when referring to the application area.

The purpose of this assessment is to:

- Present the methodologies used in producing this BNG assessment;
- Summarise the results of the biodiversity metric calculation for the Sites habitats ecological baseline in Biodiversity Units (BU);
- Summarise the expected results of the biodiversity metric calculation for the on-site's habitats ecological baseline post-development value;
- Provide the total net gains or losses based on the results of the biodiversity metric calculation with consideration given to feasibility of achieving on Site net gain or offsite to inform planning; and
- To demonstrate agreed compensation and enhancement measures in response to habitat loss within the Proposed Development to inform planning.

1.1 Site Description and Proposed Development

The Site is formed by c.0.5 ha parcel currently formed by an access track, equestrian stable units and field pasture. The Site is located east of London Road to the south of Hitchin, Hertfordshire. The wider landscape includes mixed arable and pastoral fields, Ippollitts Brook c. 160m to the east and the urbanised towns of Hitchin to the north and St Ippolyts to the south.

Works proposed in relation to this planning application include the demolition of the existing stable units and associated infrastructure and the construction of nine residential units, access, residential gardens and shared communal area. See Appendix I - Figure 1-3.

1.2 Quality Assurance and Competence

All ecologists involved in the preparation of this report are members of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow the Institute's Code of Professional Conduct when undertaking ecological work. The competence of all field surveyors has been assessed by Growing Native with respect to the current best practice guidance.

This report has been prepared by a qualified ecologist with over 13 years experience and Full Member of CIEEM. Ben Lansbury (BL) has experience in preparing and managing the delivery of Ecological Impact Assessment, Habitat Regulation Assessments and Biodiversity Net Gain Assessments. The report has also been subject to a two-stage quality assurance review by appropriately experienced ecologists who are full members of CIEEM. Field surveys were undertaken by Kirk Hardes (KH), a professional ecologist with over nine years ecology experience, an associate member of CIEEM and experience preparing numerous BNG Reports.

2 RELEVANT LEGISLATION AND POLICY OVERVIEW

2.1 The Environment Act

In England, biodiversity net gain is now required under statutory frameworks introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under this framework, every planning permission in England (unless exempt) is deemed to be subject to a general biodiversity gain condition. This will require an objective for developments to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of all on-site habitats.

This is a pre-commencement condition requiring the provision of a Biodiversity Gain Plan to be submitted and approved before works can be commenced, but after planning permission has been granted.

In principle, the grant of planning permission is not within the scope of BNG, however it is important to consider as part of the consenting body's decision-making process how a scheme will be able to demonstrate BNG after permission is granted. Therefore, this biodiversity net gain report presents the results of a Biodiversity Net Gain assessment that has been completed in order to demonstrate how the proposals will be compliant with the requirements of the Environment Act.

2.2 National Planning Policy Framework (2024)

The NPPF (MHCLG, 2024) in particular seeks to ensure that the planning system contributes to and enhances the natural and local environment and protects and enhances biodiversity. The NPPF guidance in relation to biodiversity is set out in Chapter 15: Conserving and enhancing the natural environment.

2.3 Biodiversity Net Gain Hierarchy

The statutory framework allows for the 10% biodiversity gain to be delivered through on-site biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits. However, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, development must consider the biodiversity net gain hierarchy when designing scheme proposals. This sets out the hierarchy of actions as follows:

- First, for all medium, high, and very high distinctiveness habitats, the avoidance of any adverse effects.
- Where these can't be avoided, mitigating any adverse effects on medium, high and very high distinctiveness habitats.
- Then, for all on-site habitats (including low distinctiveness), adverse effects should be compensated in accordance with the following hierarchy:
 - A. Prioritising the enhancement of existing habitats; then
 - B. Creation of on-site habitats;
 - C. Allocation of registered offsite unit gains; then
 - D. Purchase of biodiversity credits.

Proposals must demonstrate how the biodiversity hierarchy has been applied to or provide the reasons for any deviation.

3 METHODOLOGY

3.1 Biodiversity Net Gain Assessment

The following steps were followed in the preparation of this BNG assessment:

- Classification of habitats at the application Site in accordance with the UK Habitats Classification Survey (UK Habs) and BNG Metric classifications;
- Assessment of baseline habitat conditions using the condition assessment sheets of the Statutory Biodiversity Metric;
- Strategy and/or assessment of the target conditions of proposed habitats and their extents based on current Site design; and
- Calculation of Biodiversity Net Gain with the Statutory Biodiversity Metric Calculation Tool.

The following sections outline the methods for each of the steps listed above.

3.2 Baseline Survey

A habitat survey was conducted on the 30th January 2026, during a period of suitable weather. The field survey method was based on the UK Habitats Classification Survey (UK Habs) as per the UK Habs User Manual (UK Habs, 2023).

The survey involved a walkover of the Site and assessment of key habitats, land use and ecological features, particularly focusing on areas of natural interest which may be affected by the Proposed Development. The main habitats present were recorded using standard UK Habs habitat survey methodology as described in the UK Habitat Classification User Manual (UK Habs, 2023) and mapped as per the Natural England (2023) QGIS Biodiversity Net Gain template in Coreo (Natural Apptitude, 2026). Target notes were used to record habitats and features of particular interest where required.

3.3 Condition Assessment

3.3.1 Existing Habitat Conditions

A condition assessment has been undertaken on the habitats present on-site via the completion of a habitat condition assessment sheet of The Statutory Biodiversity Metric (Defra, 2024). This process evaluates criteria and characteristics for each habitat and provides guidance on an assessment of habitat condition (which can be 'good', 'fairly good', 'moderate', 'fairly poor', 'poor' or not requiring a condition assessment). The assessment criteria considered is varied for each habitat type but includes criteria such as the presence of undesirable species, habitat extent, habitat health and vegetation structure.

For any habitats present on-site for which condition assessment criteria are not available, professional judgement has been used.

3.3.2 Proposed Habitat Conditions

Proposed habitat conditions have been assigned to newly created habitats as it is anticipated that the majority of habitats will initially be lost to facilitate the Proposed Development. This has been achieved by reviewing the criteria characteristics for each habitat, set out in the guidance, or by using professional judgement after discussions with relevant parties, and the current soft landscaping proposals to determine a realistic, likely achievable condition once the habitats have established and are subject to appropriate management.

3.4 Biodiversity Net Gain Calculations

The baseline units of the Site have been determined using the Statutory Biodiversity Metric Calculation Tool (Defra, 2024).

This calculation tool was developed to provide a standardised methodology for completing a BNGA. Baseline BU and HU have been established using the findings of:

- The UK Habitat Classification (UK Habs, 2023);
- The measuring of both on-site baseline and proposed post development intervention habitats;
- Details from within the landscape plan; and
- Professional judgement.

3.5 Limitations

Baseline and post development maps were provided from PDF plans and therefore there may be a small discrepancy in areas between the BNG report and architects plans. This has been minimised as far as possible and is not deemed significant.

The habitat assessment was undertaken outside of the optimal botanical growing season, however, given the Sites heavily managed nature this was not deemed to be a significant limitation in combination with the precautionary principle.

4 RESULTS

4.1 Baseline Conditions

Based on the baseline survey map (Appendix I – Figure 2) and Site photographs (Appendix II), Table 1 below summarises the units for the baseline habitats on Site. The assessment calculates the baseline value of the Site at 0.92 BU. The habitats on Site are formed of developed land; sealed surfaces and buildings, these comprised of the stable block (u1b5) and associated hardstanding courtyard, parking areas and gravel driveway (u1b6). The land to the north of the stables was comprised of bare ground (u1c) due to excessive tramping and poor weather, a few young and sporadic elder (*Sambucus nigra*) bushes were present close to the northern boundary. Field compartments of modified grassland (g4) were present across the eastern proportion of the Site. These are formed by heavily grazed equestrian pasture comprised of dominant rye grass (*Lolium perenne*) and Common bent (*Agrostis capillaris*) with abundant meadow grass (*Poa* sp.) and cock's-foot (*Dactylis glomerata*). Forbs present included creeping thistle (*Cirsium arvense*), common mouse-ear (*Cerastium fontanum*) and clover sp. (*Trifolium* sp.).

Each habitat on Site has been presented within an individual polygon (Appendix I – Figure 2). Condition assessments for the relevant habitats are presented in Appendix III.

No habitats recorded on Site were considered to be of high strategic significance as the Site is not located within a Local Nature Recovery Strategy (LNRS) or within another formally designated site of ecological merit. All habitats within or adjacent to the Site boundary are of 'low' strategic significance.

No irreplaceable habitats were present on Site, and no signs of recent habitat manipulation to alter the baseline score were identified.

Table 1: On-site baseline habitat results.

Habitat Type		Area (ha)	Distinctiveness	Condition	Strategic Significance	Biodiversity Units (BU)
Grassland	Modified grassland	0.2995	Low	Poor	Not in local strategy	0.60
Grassland	Modified grassland	0.0061	Low	Poor	Not in local strategy	0.01
Artificial unvegetated, unsealed surface	Access track	0.0159	V. Low	N/A - Other	Not in local strategy	0.00
Artificial unvegetated, unsealed surface	Bare ground	0.1564	V. Low	N/A - Other	Not in local strategy	0.31
Developed land; sealed surface	Road	0.0013	V. Low	N/A - Other	Not in local strategy	0.00
Developed land; sealed surface	Concrete courtyard	0.0075	V. Low	N/A - Other	Not in local strategy	0.00
Developed land; sealed surface	Buildings	0.0143	V. Low	N/A - Other	Not in local strategy	0.00
Total	-	0.50	-	-	-	0.92

5 POST-DEVELOPMENT HABITATS ASSESSMENT

The Proposed Development includes a complete re-development of the Site with nine residential properties and associated infrastructure and landscaping. Detail consultation was undertaken with the design team to try and achieve an on Site gain, however, this was not feasible, largely due to the increase in developed lands and low distinctive vegetated garden.

The proposed Site layout for submission at planning consideration is shown in Appendix I – Figure 3. Table 2 below sets out the expected BU for the on-site post-intervention.

Due to the Site design being provided in PDF format, detailed habitat areas have been obtained from TAS Architects to ensure accurate post-development areas and included within the metric calculation toolkit. The proposed units for each of the area habitats on-site have been calculated and are detailed within Table 2 below.

The BNGA considers the start of the 30 year BNG period from the commencement of the development, i.e. clearance of vegetation on Site. Given the short construction period required, it has been assumed that there is no significant delay in the creation of on-site habitat.

Based on the current Site layout, it is not deemed feasible that a 10% gain is achievable on Site. Therefore, offsite credits will be required to ensure an overall net gain, with a current total net unit change of -0.09 BU from the baseline to the proposed post-development.

Table 2: Potential on-site post-development habitat areas created.

Proposed Habitat Type	Area (ha)	Distinctiveness	Condition	Strategic Significance	Temporal Risk	Difficulty to Create	Biodiversity Units (BU) Delivered
Developed land; sealed surface	0.1153	V. Low	N/A - Other	Not in local strategy	Not created in advance or delayed.	Low	0.00
Artificial unvegetated, unsealed surface	0.1069	V. Low	N/A - Other	Not in local strategy	Not created in advance or delayed.	Low	0.00
Vegetated garden	0.1532	Low	Condition Assessment N/A	Not in local strategy	Not created in advance or delayed.	Low	0.30
Unvegetated garden	0.0562	V.Low	N/A - Other	Not in local strategy	Not created in advance or delayed.	Low	0.00
Other green roof	0.0048	Low	Condition Assessment N/A	Not in local strategy	Not created in advance or delayed.	Low	0.01
Sustainable drainage system	0.0066	Low	Moderate	Not in local strategy	Not created in advance or delayed.	Medium	0.02
Other neutral grassland	0.003	Medium	Moderate	Not in local strategy	Not created in advance or delayed.	Low	0.02
Other neutral grassland – communal grassland	0.0543	Medium	Poor	Not in local strategy	Not created in advance or delayed.	Low	0.20
Individual trees	0.0407	Medium	Moderate	Not in local strategy	Not created in advance or delayed.	Low	0.19
Total	0.541	-	-	-	-	-	0.83
% change	-	-	-	-	-	-	-9.80%

6 BIODIVERSITY NET GAIN CALCULATIONS

A summary of the results of the BNG is detailed in the Table 3 below, the full metric (Pound Farm, London Road - BNGA.csv) is supplied separately. In summary the assessment indicates the Proposed Development cannot achieve an on-site net gain for habitats, with a -9.80% total net change in units and deficit of 0.18 BU.

Table 3: Biodiversity net gain headline metric results

FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)		Area habitat units	-0.09	
		Hedgerow units	0.00	
		Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)		Area habitat units	-9.80%	
		Hedgerow units	0.00%	
		Watercourse units	0.00%	
Trading rules satisfied?		No - Check Trading Summaries ▲		
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	0.92	1.02	0.18
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

7 POST-DEVELOPMENT HABITAT MANAGEMENT GUIDANCE

To help ensure compliance, all proposed habitats are no more than medium standard difficulty to create, with habitats of high difficulty to create excluded from the post-development design.

As the proposed medium distinctiveness habitats of other neutral grassland and individual trees are considered a significant on-site enhancement within statutory guidance, a Habitat Management and Monitoring Plan (HMMP) would be required to support these habitats within the proposed post-development. Therefore, a planning condition should be applied in which an appropriate HMMP is submitted prior to the discharge of the related condition.

Given the Site's limited capacity to deliver biodiversity net gain on-site, and the applicant's statutory requirement to achieve a minimum 10% net gain, the proposed approach is to achieve meaningful on Site gains, as shown on Appendix I, Figure 3, and secure the required uplift through the purchase of off-site biodiversity units from a registered third-party provider. This will be formalised and evidenced through the submission and approval of a Biodiversity Gain Plan.

8 CONCLUSION

This assessment provides an account of baseline habitats present on Site. At present, the on Site baseline consists of 0.92 units. On-site post intervention creates a total of 0.83 units, resulting in an overall loss of 0.09 units or -9.80%.

As a result, the Proposed Development is unable to achieve the required biodiversity net gain through on-site measures alone. To address this shortfall, the necessary biodiversity units will be secured through the purchase of off-site units from a registered third-party provider, in accordance with the statutory biodiversity gain hierarchy and trading rules. This will ensure that the development delivers the mandatory minimum 10% biodiversity net gain.

Delivery of biodiversity net gain will be formalised through the submission and approval of a Biodiversity Gain Plan, which will set out the off-site provision. In addition, a Habitat Management and Monitoring Plan (HMMP) will be secured by planning condition to ensure the appropriate long-term management of retained on-site habitats for a minimum period of 30 years.

On this basis, it is concluded that the Proposed Development can meet the statutory requirements for biodiversity net gain, and that sufficient information has been provided to support the determination of the planning application.

9 REFERENCES

- CIEEM, CIRIA, IEMA (2016) Biodiversity Net Gain: Good practice principles for development, 2016
- CIEEM (2021). Biodiversity Net Gain Report and Audit Templates Chartered Institute of Ecology and Environmental Management, Winchester, UK.
- BS 42020:2013 Biodiversity – Code of Practice for Planning and Development.
- Department for Environment, Food & Rural Affairs (Defra). (2024). The Statutory Biodiversity Metric: User Guide.
- Department for Environment, Food & Rural Affairs (Defra). (2024). Make on-site biodiversity gains as a developer. [Make on-site biodiversity gains as a developer - GOV.UK](#)
- Environment Act. (2021). <https://www.legislation.gov.uk/ukpga/2021/30/schedule/-14/enacted>.
- Ministry of Housing, Communities and Local Government (MHCLG). (2024). National Planning Policy Framework. https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf
- Natural Apptitude. (2025). Coreo. <https://coreo.io/>
- Natural England. (2023). The Biodiversity Metric Supporting Documents. Biodiversity Metric – QGIS Template. <https://publications.naturalengland.org.uk/publication/6049804846366720>
- UK Habs. (2023). UK Habitat Classification Habitat Version 2.0 at <http://www.ukhab.org/>.

APPENDIX I – FIGURES

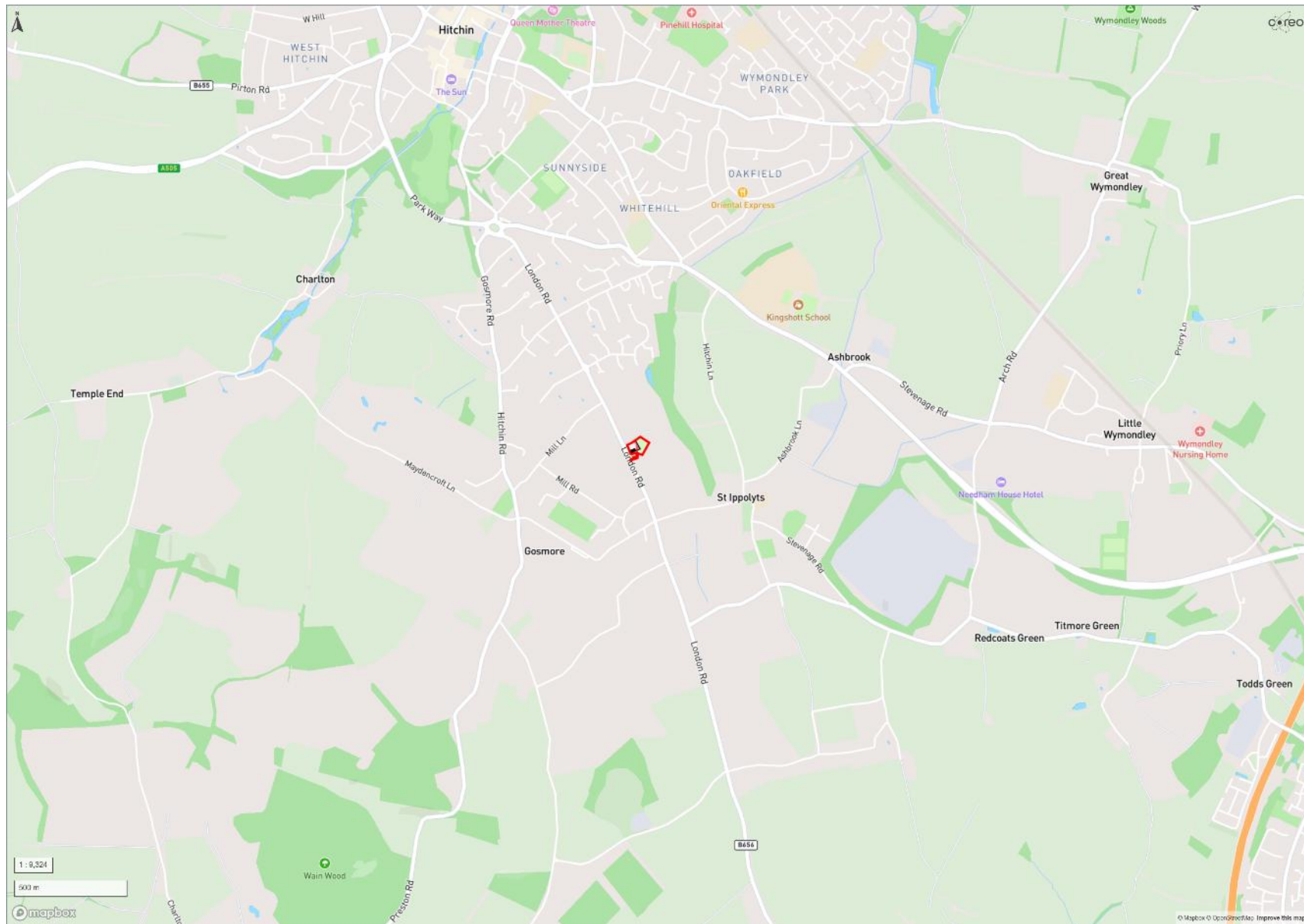


Figure 1: Site Location Plan.

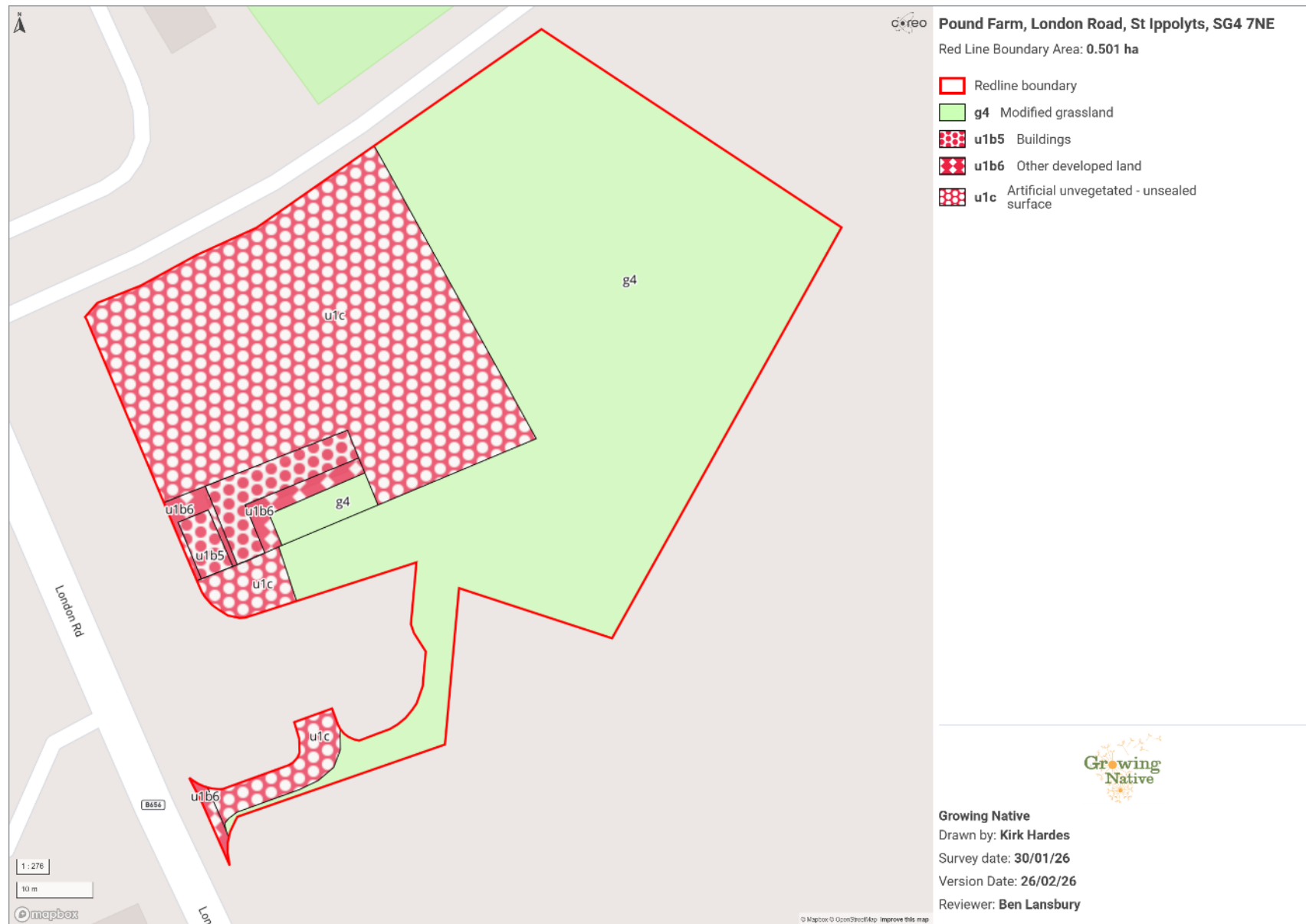


Figure 2: Baseline Habitat Plan.



Figure 3: Proposed Site Plan (TAS Architects, 2026)

APPENDIX II – SITE PHOTOGRAPHS



Plate 1. Current access track from London Road.



Plate 2. Southern field parcel where proposed access route will be situated.



Plate 3. Existing access route to stables.



Plate 4. Central stable block section.



Plate 5. Eastern section of stables and courtyard.



Plate 6. Swallow nest within central stable block.



Plate 7. Felt stable block roof.



Plate 8. Eastern section of stables and fields to the north.



Plate 9. Field to north of stables with sporadic elder scrub.



Plate 10. Paddock and stable block.



Plate 11. Fields immediately east of stable blocks.



Plate 12. Eastern field compartment.

APPENDIX III – CONDITION ASSESSMENT

Condition Criteria Assessment for Modified Grassland		Habitat Reference	
		30698395	30698399
A	There are 6-8 vascular plant species per m2 present, including at least 2 forbs.	No	No
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20 per cent is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No	No
C	Scrub accounts for less than 20% of total grassland area.	Yes	Yes
D	Physical damage evident in less than 5% of total grassland area,	No	Yes
E	Cover of bare ground between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	No	No
F	Cover of bracken is <20%.	Yes	Yes
G	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981)	Yes	Yes
Essential criterion achieved (Yes or No)		No	No
Number of criteria passed		3	4
Condition		Poor	Poor



Contact: Kirk Harges

Telephone: 07568426464

Email: kirk@growing-native.co.uk