

31st March 2026
File Note: BNG for Land at Sturmer Hall, Church Walk, Haverhill, Essex, CB9 7XD

Ref: Biodiversity Net Gain (BNG) statutory version reporting file note

Site address: Land at Sturmer Hall, Church Walk, Haverhill, Essex, CB9 7XD

National Grid Reference: Centred on TL 689 438

Site area: 3.62444ha BNG project area assessed.

Recipients: AGORA Architects LTD

BNG change summary

	Area units	Linear units	Watercourse
% Change	+0.17%	+73.52%	N/A
More units required for a 10% net gain	0.98 units including 0.23 scrub units to satisfy BNG and meet trading rules.	N/A	N/A

Record of activity

➤ **Background**

Arbtech consulting Ltd were instructed by AGORA Architects LTD to undertake a Biodiversity Net Gain (BNG) evaluation of a development on the site, subject to a planning application with Braintree District Council for:

The construction of 12-15 Care Bungalows and a new SEND School.

➤ **Purpose of survey**

The National Planning Policy Framework (NPPF) makes it clear (para 180) that planning policies and decisions should contribute to and enhance the natural and local environment by; minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Paragraph 180 requires the promotion of the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

In England, Biodiversity Net Gain (BNG) is mandatory under [Schedule 7A of the Town and Country Planning Act 1990 \(as inserted by Schedule 14 of the Environment Act 2021\)](#).

Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.

Proposals for net gain should be clearly recorded and reported through use of an appropriate metric such as the DEFRA statutory Biodiversity Metric. Natural England advise that any net gain should be fully secured and funded for the lifetime of the development.

The 10% target was set by the government to be the standard minimum net gain required by BNG.

Therefore, the purpose of this survey report is to provide an evaluation of the proposed plans compared to the ecological baseline, and to report any net gain (or loss) to biodiversity using the DEFRA statutory Biodiversity Metric scheme.

➤ **Surveyor and date of survey**

This survey report was carried out by Craig Williams, BSc (Hons), MSc, DIC, MRSB of Arbtech Consulting Ltd. iteratively, with the latest version (1st) on 31st March 2026. A previous Preliminary Ecological Appraisal (PEA) is used as the ecological baseline and was carried out on 16th September 2025. The baseline habitat map and the current proposed plan are found in appendix 1 and 2.

Measuring biodiversity

For the purposes of BNG, biodiversity value is measured in standardised biodiversity units.

A habitat will contain a number of biodiversity units, depending on things like its:

- size
- quality
- location
- type

Biodiversity units can be lost through development or generated through work to create and enhance habitats.

Site-specific BNG methodology notes

- Scattered tree locations and diameter are taken from the topographical survey. An arboricultural survey could be used to update the BNG for more accuracy.
- Habitat can be counted as 'retained' if it can be returned to the same type and condition within 2 years of the development commencing.
- Only habitats inside the supplied red line boundary are measured in the BNG.

Summary findings

- The full results of the metric are included in the excel file:

Statutory BNG metric (Land at Sturmer Hall CB9 7XD) v1

This highlights that the current changes in the biodiversity habitat metric are:

- **+0.17% in area units**
- **+73.52% in linear units**

- The results indicate a net gain in area units below 10%, and a net gain above 10% in linear units.

Unit change discussion

- The currently proposed plan results in a **0.17%** net gain in area habitat units (a gain of 0.02 area units from a baseline of 9.99).
- The currently proposed plan results in a **73.52%** net gain in linear habitat units (a gain of 0.08 linear units from a baseline of 0.11).

- The low positive change in area units is less than the overall positive target of biodiversity net gain (10% gain) and is unlikely to be sufficient based on the policy outlined above. The net gain in linear units is satisfactory.

BNG metric update recommendations

- Updated and enhanced proposed landscape plans could be used to recalculate the metric, in line with the BNG hierarchy of avoidance/retention in the first instance, then compensation on-site where possible. To achieve a 10% net gain on site and satisfy trading rules with the same layout, the 0.43ha of retained bramble scrub on the western bund could be enhanced to mixed scrub (hazel, hawthorn, blackthorn etc) of moderate condition (sometimes referred to as native thicket planting in landscape plans).

Creation and management

- The creation and management of any significant habitats on the compensation site to the appropriate condition would need to be secured for at least 30 years - linked to the application through a planning obligation in Section 106 (S106) agreement.
- If the plans are not changed and no other significant ecological habitats are proposed on site, the area habitat unit deficit of **0.98 units including 0.23 scrub units** to satisfy BNG and meet trading rules can be compensated for on other off-site land owned by the client, a third party habitat banking scheme where these units can be brought or through statutory credits. One or a mixture of these routes is required to make up to the overall net gain for area units.

If an off-site parcel or third-party land bank is used to purchase the units, the site must be registered for such BNG unit provision and the BNG updated with the details.

If a 10% net gain is still not achieved, a financial contribution to off-site ecological enhancements within the government's approved statutory biodiversity credits scheme can be used, although **This approach is also only to be used after exhausting all possibility of achieving net gain on site or nearby, and also after exploring if any habitat can be retained on site as far as possible in line with the BNG hierarchy.**

Statutory credits cost

- **As a last resort**, the costs for BNG compensation using statutory credits have been issued by the government as outlined here:

<https://www.gov.uk/guidance/statutory-biodiversity-credit-prices>

- Statutory biodiversity credit prices are not guideline prices for biodiversity units sold in the off-site private market. Prices are based on the cost to create, maintain and monitor different habitat types. There is also a mark-up to prevent statutory credit prices undercutting the off-site market.
- These units will likely be cheaper to source in the local third party BNG unit market, or in collaboration with the LPA.
- If you buy statutory biodiversity credits, a 'spatial risk multiplier' (SRM) will apply, which **doubles the number of statutory credits you need**. It will be more cost effective, therefore, to obtain these as offsite units rather than credits.
- For each habitat type in the table, you can see its 'tier'. Statutory biodiversity credits are priced in tiers according to habitat type for area-based biodiversity units. There are separate prices for hedgerow and watercourse biodiversity units.
- For the units required for this development (0.63 area units including 0.26 more tree units), this would equate to:

Area units

1.96 tier A1 units at £42,000 per credit = £82,320

These prices do not include VAT. You will see VAT in the invoice for any statutory credit purchase.

Biodiversity Gain Plan

- Whichever method (or combination) is chosen for the compensation, biodiversity Gain Plan (BGP) will be required after planning approval. This must include:
 - a) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat
 - b) the pre-development biodiversity value of the onsite habitat,
 - c) the post-development biodiversity value of the onsite habitat,
 - d) any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development,

e) any biodiversity credits purchased for the development.

- The management and monitoring of any significant habitat to the appropriate condition either on site or offsite will need to be accompanied by a Habitat Management and Monitoring Plan (HMMP) secured for at least 30 years - linked to the application through a planning obligation in Section 106 (S106) agreement.

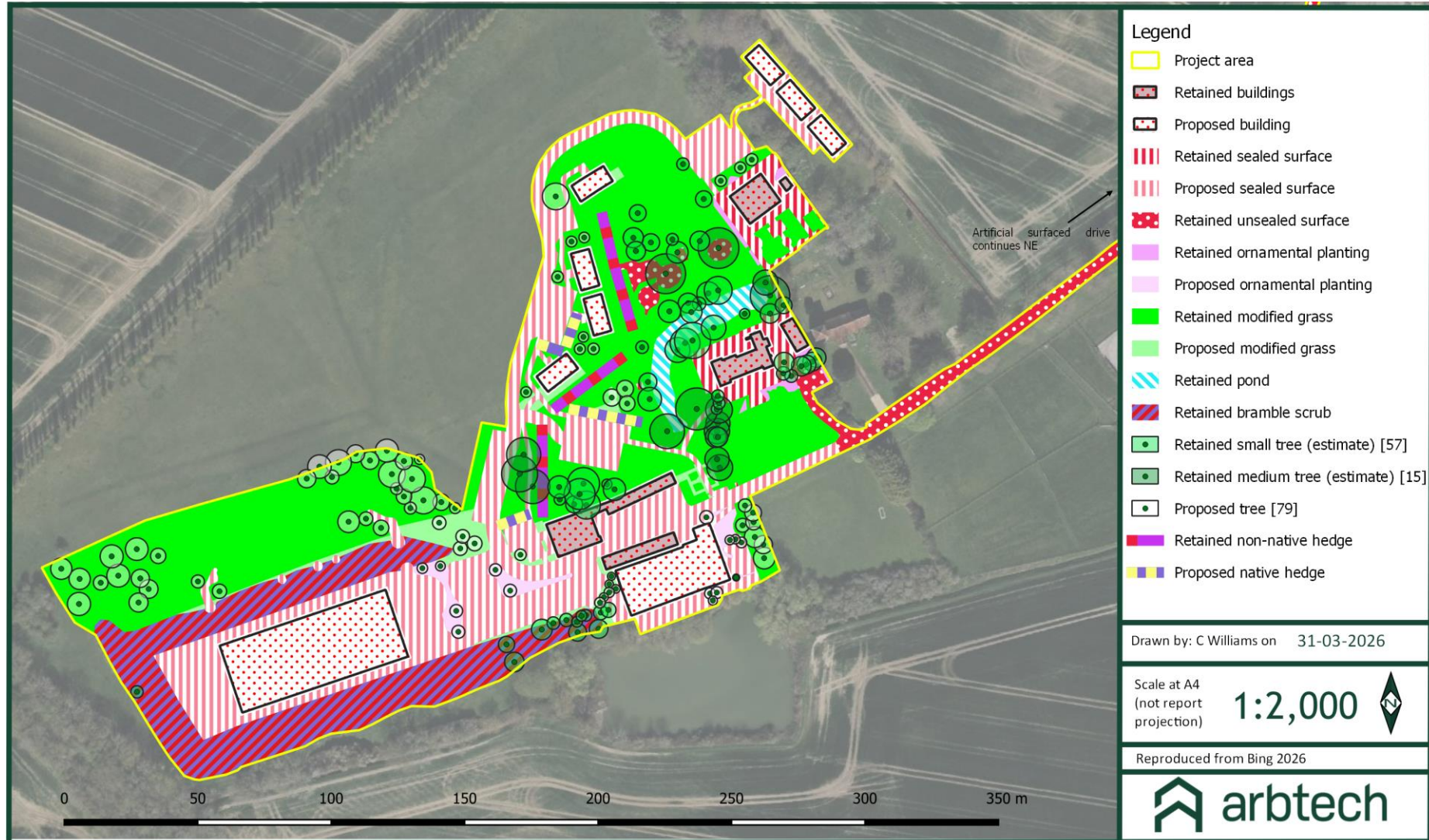
- Design statement

This report contains recommendations on measures for achieving BNG. These recommendations do not constitute a design for BNG. In submitting these recommendations, Arbtech Consulting has no Design Liability associated with these recommendations for BNG. The strategy sets out the criteria which the landscape team can use to design the creation and management of the site.

Appendix 1: Habitat baseline map



Appendix 2: Currently proposed ecological map of the site



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