

Biodiversity Net Gain Assessment

For

PlayZone, Motts Field, Haverhill

April 2025



Client: McArdle Sport-Tec Ltd

Report version: 1

Report status: Issue

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This report has been prepared in compliance with

- The industry-wide standards for report-writing, as described in the report 'Guidelines for Ecological Report Writing' 2nd edition, by Chartered Institute of Ecology and Environmental Management (2017).
- The Code of Professional Conduct of the Chartered Institute of Ecology and Environmental Management (January 2022)
- BS 42020:2013 'Biodiversity – code of practice for planning and development'

Author	Reviewer	Approved
Nick Sibbett CEnv MCIEEM	Vicky Rusby ACIEM	Nick Sibbett CEnv MCIEEM
8 th April 2025	9 th April 2025	10 th April 2025

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Acknowledgements

Simon Collin of West Suffolk Council assisted with discussions of site design and management, and provided access to the site, which is gratefully acknowledged.

Summary

Sibbett Ecology was commissioned by McArdle Sport Tec to prepare an assessment of Biodiversity Net Gain for a development of a PlayZone. It is proposed to construct a PlayZone, a hard-surfaced and fenced sports pitch illuminated by floodlights, at a site in Motts Field, Haverhill. The site already contains a smaller hard-surfaced play pitch surrounded by fencing, and is set within amenity grassland. A short length of hedge in poor condition would need to be removed to facilitate the development. Nine new rowan trees would be planted.

The metric calculator and condition assessments were carried out and accompany this report. The accompanying Metric calculator shows the calculations of baseline Habitat Units and the proposed Habitat Units. The metric shows a change from 0.18 Habitat units to 0.20 Habitat Units (subject to rounding numbers to two decimal places), which represents a 10.05% net gain. There is a change from 0.00% (i.e. <0.01% subject to rounding down) hedge units to 0.02 hedge units, which is a 389.09% net gain.

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1. Introduction

Commissioning client, site name and purpose of report

1.1 Sibbett Ecology was commissioned by McArdle Sport-Tec Ltd to prepare an assessment of Biodiversity Net Gain for a development of a PlayZone, a hard-surfaced sports play area, at Motts Field, Haverhill.

Site context and description of development

1.2 The site of the proposed development is set within a sports field with two football pitches, and surrounding amenity greenspace. Haverhill FC has a clubhouse within the field near the proposed development.

1.3 There is an existing, smaller, play pitch on the site, which would be replaced by the new larger PlayZone. The location of the site is shown in Appendix 1. The PlayZone will be a surfaced sports pitch suitable for all-year round intensive use. It will be illuminated by floodlights to allow use in the evenings, especially in winter when daylength is short. There will be a hard surfaced connection to the adjacent pavement of Chalkstone Road. Details of the development are shown in Appendix 2.

Relevant Policy and legislation

1.4 The statutory background to Biodiversity Net Gain, and the Government's Planning Practice Guidance on this topic, are found on the Government's website at <https://www.gov.uk/guidance/biodiversity-net-gain> (accessed when writing this report). This report is written using that guidance.

1.5 Local Nature Recovery Strategies are used to identify strategically important habitats. Where no Local Nature Recovery Strategy exists, such as in Suffolk, by convention all habitats are recorded as not being strategically significant.

1.6 The statutory requirement for 10% net gain outweighs Local Plan policy in this respect. Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework. It will also be inappropriate for plans or supplementary planning documents to include policies or guidance which are incompatible with this framework, for instance by applying biodiversity net gain to exempt categories of development or encouraging the use of a different biodiversity metric or biodiversity gain hierarchy. Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified

Competencies

1.7 The surveyor and report author was Nick Sibbett CEnv MCIEEM, Director at Sibbett Ecology Ltd. He has 17 years' experience at English Nature / Natural England on SSSI/SAC/SPA advice and land management, and for some of that time was a Protected Species Officer. He was then an ecological consultant for 16 years at the Landscape Partnership, being promoted to Associate Director. He set up Sibbett Ecology, a boutique ecological micro-consultancy, in summer 2024. He is very experienced in the topics within this report. His botanical skills are to FISC level 3.

1.8 The reviewer was Vicky Rusby ACIEEM, ecological consultant and director at 360 Ecology Ltd with 8 years' experience as an ecologist. Vicky has completed training for biodiversity net gain assessments and is considered a competent assessor. The review was to provide advice to the report author only, and the author decides how to use that advice. The reviewer therefore has no legal responsibility for the published report.

2. Methods

Desktop study and field survey methods

- 2.1 The Magic website¹ was accessed on 24th February 2025 to identify any Priority Habitats that were recorded for the site.
- 2.2 A survey of all habitats in the proposed development site was carried out on 31st January 2025, in cold but dry weather with little wind.
- 2.3 The survey followed the standardised UK Habitat Classification and mapping methodology². It encompassed recording and mapping all habitats present in the proposed development site, along with areas or features of ecological interest within those habitats. The methodology enabled an assessment of habitats without the requirement to individually identify every plant species present on the site. When plant species were named, their scientific names were cited according to Stace (ed. 4th edition)³. The Condition of habitats was assessed using the spreadsheets associated with the statutory Defra metric for Biodiversity Net Gain.
- 2.4 The survey was carried out in winter when some plants would have seasonally died back and not been visible. Habitats had not been managed for some time before the survey, so plants had not been removed by mowing, for example. The urban character of the site, with little vegetation, meant that the season of survey was not considered to be a significant limitation.

Approach to BNG

- 2.5 The Defra Statutory Metric, version 23.07.24, was used to calculate the net change in Biodiversity Units. The Statutory Metric Condition Assessments 23.07.24 were used to record the condition of habitats. Baseline habitat areas were measured on site. Proposed habitat areas were measured from the development proposals by McArdle Sport-Tec.
- 2.6 The Statutory Metric User Guide by Defra, updated in July 2024, was used to inform the approach taken in this report.

The BNG hierarchy

- 3.1 The Biodiversity Gain Hierarchy and its effect for the purpose of the statutory framework for biodiversity net gain is set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This hierarchy (which does not apply to irreplaceable habitats) sets out a list of priority actions:

first, in relation to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and

then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.

¹ <https://magic.defra.gov.uk/MagicMap.aspx>

² UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)

³ Stace, C (2019) *New Flora of the British Isles*. C&M Floristics. 4th Edition.

3.2 Planning authorities must take into account how the Biodiversity Gain Hierarchy has been applied and if it has not been applied the reason for that or absence of a reason when determining whether to approve the Biodiversity Gain Plan. If they decide not to approve the Plan they must give reasons for that stating the elements of the plan that are relevant to the determination.

3.3 The Biodiversity Gain Hierarchy is distinct from the mitigation hierarchy set out in paragraph 193(a) of the National Planning Policy Framework which states that a planning application should be refused if significant harm to biodiversity resulting from the development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for. How biodiversity net gain will be secured for a development may be relevant to consideration of the policy in the Framework, especially in relation to adequate mitigation and compensation.

Minimum BNG requirements for a submission

3.4 Where an applicant believes the development would be subject to the biodiversity gain condition, the application must be accompanied by minimum information set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate);
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- the completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have:
 - a statement to the effect that these activities have been carried out;
 - the date immediately before these activities were carried out;
 - the pre-development biodiversity value of the onsite habitat on this date;
 - the completed metric calculation tool showing the calculations, and
 - any available supporting evidence of this;
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Declarations

3.5 These declarations are required to accompany the application, as set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015⁴:

- The applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate) is set out below and on the accompanying metric spreadsheet;
- The applicant proposes to use the date of application for the pre-development biodiversity value.
- the completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value, accompanies this report. The publication date of the metric is 23rd July 2024.
- No activities unauthorised by planning application have been carried out prior to the date of application (or earlier proposed date), that resulted in loss of onsite biodiversity value ('unauthorised degradation').
- No irreplaceable habitat is present on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable) are provided below.

⁴ Paragraph: 011 Reference ID: 74-011-20240214 of <https://www.gov.uk/guidance/biodiversity-net-gain> accessed on 13th January 2024

3. Baseline Conditions

Important ecological features and their influence on the deliverability of BNG

Designated sites

3.1 The development site is not within any Site of Special Scientific Interest, European-designated site, or County Wildlife Site

Priority habitat

3.2 No priority habitats were present.

Habitats present

4.1 The site comprised a modified grassland. An existing hard-surfaced play area was also present. A fence near the play area prevented loose balls from entering the nearby road. There was no marked boundary to the development site; it was contiguous with additional modified grassland. A linear woodland was close to the unmarked northern boundary of the site.

4.2 Habitats are shown on Figure 01 and are described below.

Modified grassland g4

4.3 The site contained species-poor close-mown amenity grassland with approximately 2 (range 1–3) species per square metre. Its condition was poor.

4.4 Species present in the grassland, most being found in small amounts scattered throughout unless otherwise indicated, included

- Rye-grass *Lolium* sp (probable horticultural variety) (dominant)
- Bent-grass *Agrostis* sp
- White clover *Trifolium repens* (<1% coverage)

Developed land, sealed surface u1b6

4.5 The existing play area was classified as this habitat.

Native hedge h2a6

4.6 A native hedge separated the site from roadside verge. It was flailed to a small size and was very gappy. Hawthorn *Crataegus monogyna* was the dominant shrub. There was mown grass both sides of the hedge. Two metres of the hedge was in the site boundary.

Baseline Metric calculation

3.3 The accompanying Metric calculator shows the calculations of baseline Habitat Units. There was a calculated baseline of 0.18 Habitat Units, and less than 0.01 Hedgerow Units (expressed as 0.00 Hedgerow Units when rounded down in the metric to two decimal places) as subjected to rounding of numbers in the metric. There were no Watercourse Units.

4. BNG Good practice principles for development

4.7 The Biodiversity Gain Hierarchy and its effect for the purpose of the statutory framework for biodiversity net gain is set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This hierarchy (which does not apply to irreplaceable habitats) sets out a list of priority actions:

first, in relation to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and

then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.

Planning authorities must take into account how the Biodiversity Gain Hierarchy has been applied and if it has not been applied the reason for that or absence of a reason when determining whether to approve the Biodiversity Gain Plan. If they decide not to approve the Plan they must give reasons for that stating the elements of the plan that are relevant to the determination.

4.8 The Biodiversity Gain Hierarchy is distinct from the mitigation hierarchy set out in paragraph 193(a) of the National Planning Policy Framework which states that a planning application should be refused if significant harm to biodiversity resulting from the development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for. How biodiversity net gain will be secured for a development may be relevant to consideration of the policy in the Framework, especially in relation to adequate mitigation and compensation.

5. Proposed design

- 5.1 The proposals include the construction of the PlayZone, with a new 5m long hedge to replace the 2m length of hedge to be removed. Nine new rowan trees will be planted. Trees will be in moderate condition. The proposed layout is shown in Appendix 2.
- 5.2 The translation of this into UK Habitats is provided in Figure 02, from which area measurements were taken.

6. BNG metric results

Results of metric calculation

- 6.1 The metric calculator and condition assessments accompany this report. Appendix 3 shows the Headline Results.
- 6.2 The metric shows a change from 0.18 Habitat units to 0.20 Habitat Units (subject to rounding numbers to two decimal places), which represents a 10.05% net gain. There is a change from 0.00% (i.e. <0.01% subject to rounding down) hedge units to 0.02 hedge units, which is a 389.09% net gain.

Has the 10% net gain target been achieved?

- 6.3 Yes, the statutory target of 10% net gain has been achieved and exceeded.

Figure 1. Habitat survey

Key

- Red-line Boundary
- Modified grassland g4
- Developed land; sealed surface u1b

Charrington Close
Chalkstone Way

Haverhill
Town FC

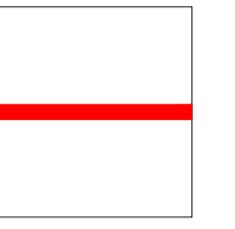
Sibbett Ecology Ltd
047 - West Suffolk PlayZones -
Motts Field, Haverhill
Figure 01 - Habitat Survey
April 2025

Figure 2. UK Habitat Classification of proposals

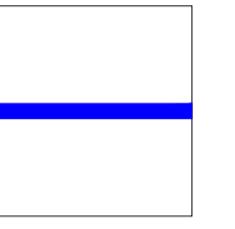


Appendix 1

Location



APPLICATION SITE AREA REQUIRED



LAND AREA UNDER OWNERSHIP OF CLIENT



Initial Issue
A m e n d m
nt
MOTTS FIELD

PLAYZONE

wing LOCATION PLAN

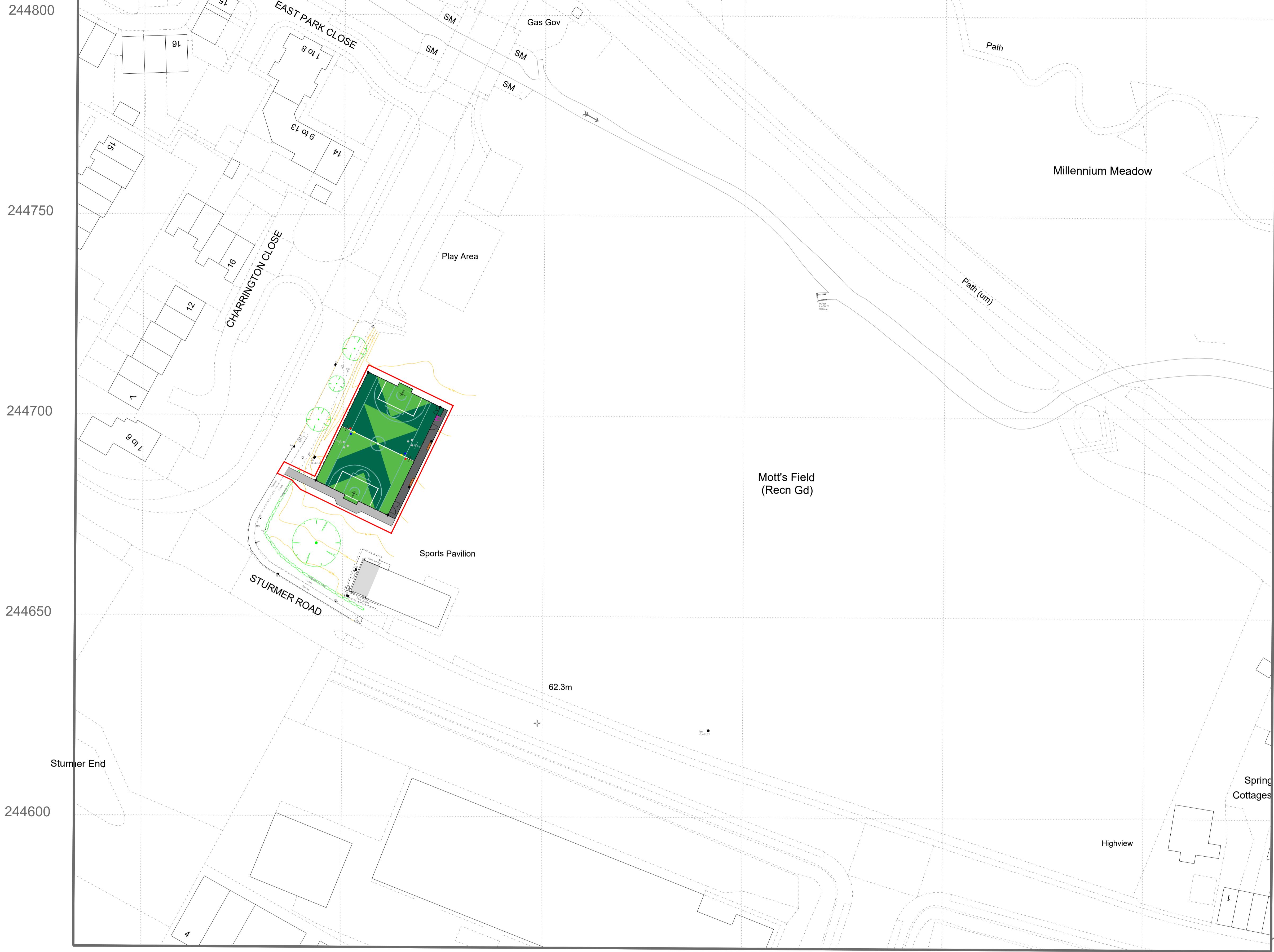


Own NJM	Date 17-02-25	Scales 1:1250		
checked	Plot No 01	Prelim	Check	Final

No	Drawing No	Rev
	MCA-MUK3386-03	

Appendix 2

Proposed development



NOTES

244800

APPLICATION SITE AREA REQUIRED

244750

LAND AREA UNDER OWNERSHIP OF CLIENT

244700

244650

244600

244567

Initial Issue

Rev A m e n d m e n t Date By

Client

MOTTS FIELD

Project

PLAYZONE

Drawing

SITE PLAN


McARDLE
SPORT TEC

Drawn NJM Date 17-02-25 Scales 1:500
Checked Plot No 01 Prelim Check Final

Job No MCA-MUK3386-02 Rev

FACILITY TYPE

FOOTBALL & BASKETBALL PLAYZONE
MACADAM PLAYZONE WITH PERIMETER
FENCING, FLOODLIGHTING, HARD-STANDING AREA AND
EQUIPMENT

CONSTRUCTION

COLOUR COATED
65MM 2 LAYER MACADAM
250MM SUB BASE
FORMATION LAYER

DIMENSIONS

FENCE TO FENCE = 30 X 20M
2NR GOAL RECESSES = 3.66 X 1M
SPECTATOR AREA = 30 X 2M
ACCESS ROUTE

PERIMETER FENCING

NEW TWIN BAR PANEL FENCING (3M HIGH RAISING TO 4M
BEHIND GOALS) AROUND FOOTPRINT OF PLAYZONE
3NR DOUBLE GATE ACCESS
1NR SINGLE GATE ACCESS

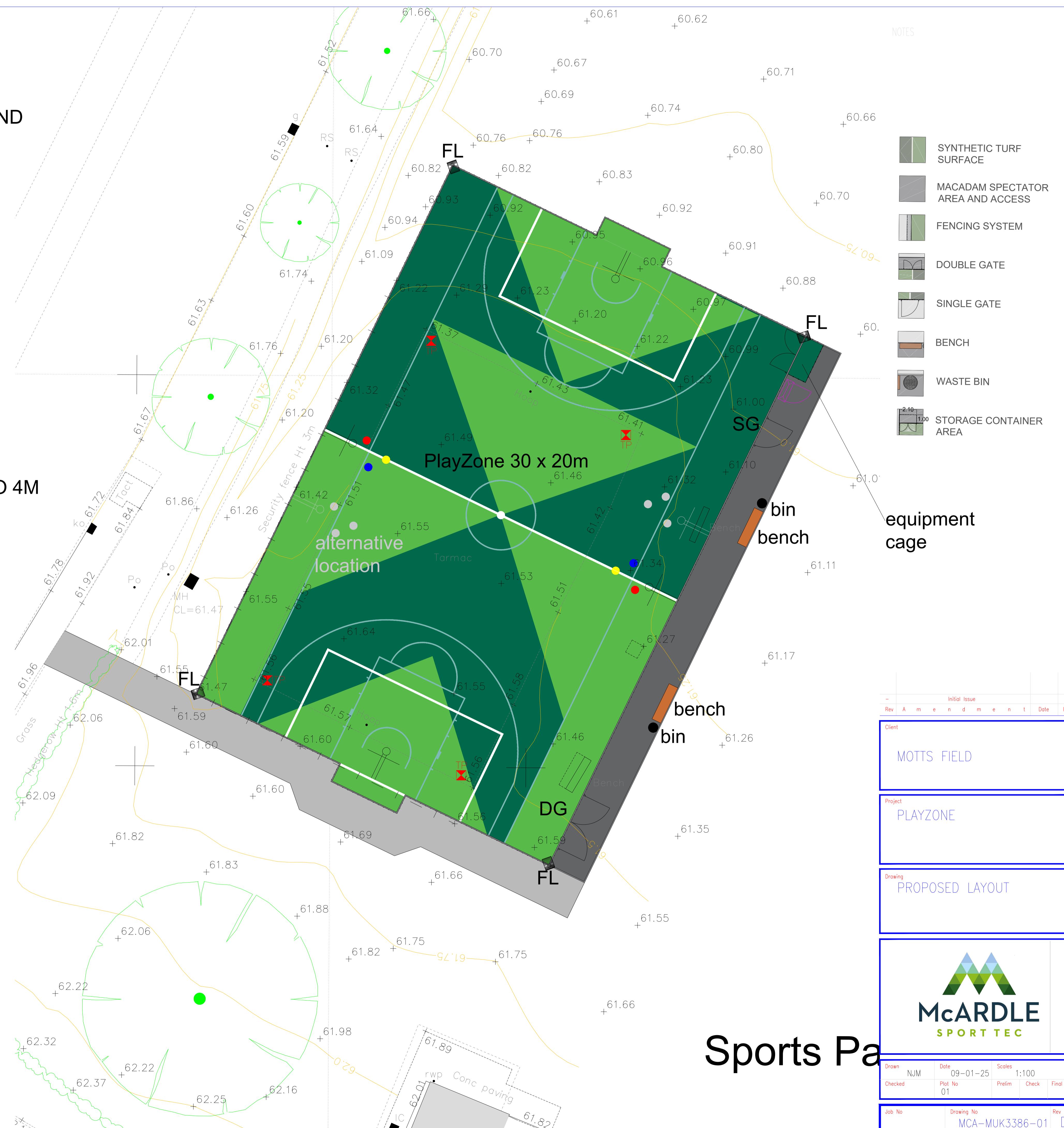
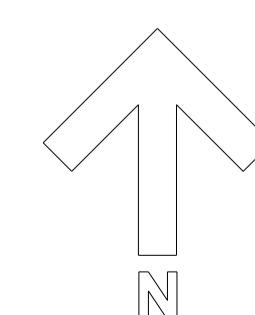
LED FLOODLIGHTING

8.0M HIGH FENCE FIXED LED FLOODLIGHTING
(4NR LUMINAIRES TOTAL)
AVERAGE LUX = 120LUX
UNIFORMITY = 0.65
(LIGHTING PLAN SEPARATE)

EQUIPMENT

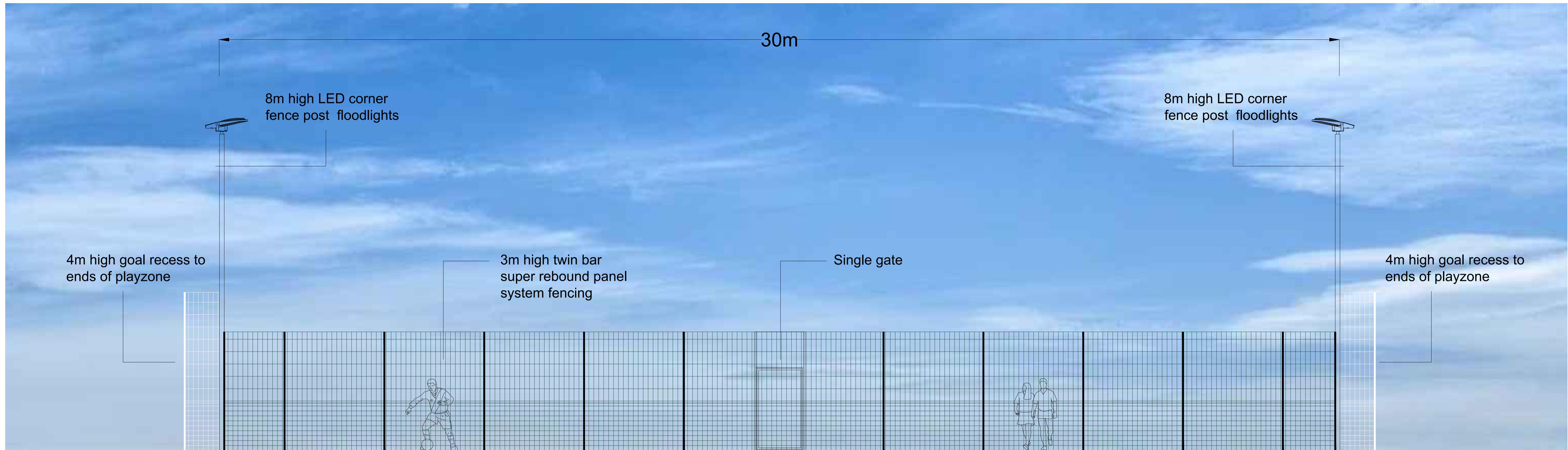
2NR GOALS (INTEGRAL TO FENCING)
4NR BASKETBALL HOOPS
2NR BENCHES
2NR WASTE BINS
1NR STORAGE CONTAINER

0m 1m 2m 3m 4m 5m 6m 7m 8m 9m 10m 11m 12m 13m 14m 15m 16m 17m 18m 19m 20m
Scale bar 1 : 100

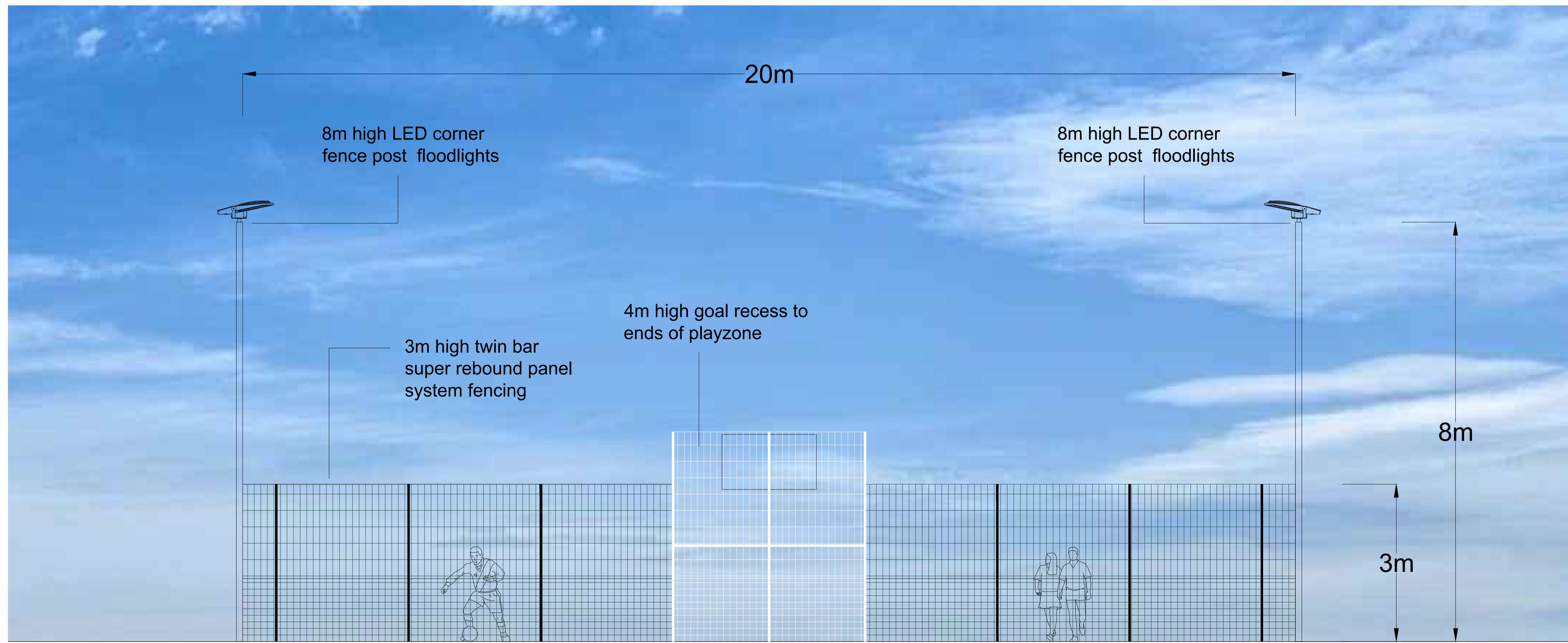


Sports Pa

Drawn	NJM	Date	09-01-25	Scales	1:100
Checked		Plot No	01	Prelim	Check
Job No		Drawing No	MCA-MUK3386-01	Rev	D



SIDE ELEVATIONS



END ELEVATIONS

Scale bar 1 : 50

NOTES

Initial Issue		Date	By			
Rev	A	mm dd yy				
Client						
MOTTS FIELD						
Project						
PLAYZONE						
Drawing						
ELEVATIONS						
 McARDLE						
Drawn	NJM	Date	17-02-25	Scales	1:50	
Checked		Plot No	01	Prelim	Check	Final
Job No	Drawing No					
MCA-MUK3386-04						

Appendix 3

Headline results

Motts Field PlayZone

Headline Results

Return to
results menu

Scroll down for final results ▲

On-site baseline

<i>Habitat units</i>	0.18
<i>Hedgerow units</i>	0.00
<i>Watercourse units</i>	0.00

On-site post-intervention
(Including habitat retention, creation & enhancement)

<i>Habitat units</i>	0.20
<i>Hedgerow units</i>	0.02
<i>Watercourse units</i>	0.00

On-site net change
(units & percentage)

<i>Habitat units</i>	0.02	10.05%
<i>Hedgerow units</i>	0.02	389.09%
<i>Watercourse units</i>	0.00	0.00%

Off-site baseline

<i>Habitat units</i>	0.00
<i>Hedgerow units</i>	0.00
<i>Watercourse units</i>	0.00

Off-site post-intervention
(Including habitat retention, creation & enhancement)

<i>Habitat units</i>	0.00
<i>Hedgerow units</i>	0.00
<i>Watercourse units</i>	0.00

Off-site net change
(units & percentage)

<i>Habitat units</i>	0.00	0.00%
<i>Hedgerow units</i>	0.00	0.00%
<i>Watercourse units</i>	0.00	0.00%

Combined net unit change
(Including all on-site & off-site habitat retention, creation & enhancement)

<i>Habitat units</i>	0.02
<i>Hedgerow units</i>	0.02
<i>Watercourse units</i>	0.00

Spatial risk multiplier (SRM) deductions

<i>Habitat units</i>	0.00
<i>Hedgerow units</i>	0.00
<i>Watercourse units</i>	0.00

FINAL RESULTS

Total net unit change

<i>Habitat units</i>	0.02
<i>Hedgerow units</i>	0.02
<i>Watercourse units</i>	0.00

Total net % change
(Including all on-site & off-site habitat retention, creation & enhancement)

<i>Habitat units</i>	10.05%
<i>Hedgerow units</i>	389.09%
<i>Watercourse units</i>	0.00%

Trading rules satisfied?

Yes ✓

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
<i>Habitat units</i>	10.00%	0.18	0.20	0.00
<i>Hedgerow units</i>	10.00%	0.00	0.00	0.00
<i>Watercourse units</i>	10.00%	0.00	0.00	0.00

No additional area habitat units required to meet target ✓
 No additional hedgerow units required to meet target ✓
 No additional watercourse units required to meet target ✓