BIODIVERSITY NET GAIN PLAN

PROPOSED ERECTION OF 11 INDUSTRIAL UNITS

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1.0 INTRODUCTION & SUMMARY

1.1 Purpose and Scope of the Report

This Biodiversity Net Gain (BNG) Plan has been prepared in support of a full planning application for the erection of 11 industrial units on land off Stephenson Avenue, Pinchbeck. The report has been produced in accordance with the requirements of the Environment Act 2021, alongside the latest iteration of the Statutory Biodiversity Metric (Defra) and relevant Planning Practice Guidance.

The document establishes the baseline ecological condition of the site, quantifies the predicted biodiversity losses and gains arising from the proposed development, and sets out a detailed Habitat Management and Monitoring Plan (HMMP) to secure habitat delivery over a minimum 30-year period. It further provides professional ecological justification for the approach taken, particularly in the context of a brownfield industrial site of demonstrably negligible biodiversity value.

2.0 SITE CONTEXT AND BASELINE CONDITIONS

2.1 Site Location and Surrounding Land Use

The application site extends to approximately 0.2630 hectares and is located within the centre of an established and intensively developed industrial estate in Pinchbeck. The surrounding land use is characterized by large-scale commercial and industrial buildings, with limited or negligible semi-natural habitat present within the immediate landscape. The site is therefore firmly situated within an urban-industrial context, with minimal ecological connectivity to wider green infrastructure.

2.2 Historical Use and Site Clearance

The site historically formed part of a larger adjoining industrial holding and was used for the storage of inert materials associated with the maintenance and operation of that site. These materials comprised predominantly aggregate, soil-based scrapings, and other inert spoil arising from yard and hardstanding maintenance.

As part of the legal agreement for the sale of the land to the applicant in mid-2025, the previous owner was required to remove all stored material and leave the site in a cleared condition. Consequently, at the point of acquisition and subsequent baseline assessment, the site comprised entirely bare, level ground, devoid of vegetation and free from any residual ecological features.

It is important to note that there is no credible evidence to support the presence of hedgerows or established grassland within the site boundary at any point in recent history. Any apparent vegetation observed in aerial imagery is considered to relate to off-site bramble (*Rubus fruticosus agg.*) growth encroaching through boundary fencing from adjacent land, rather than representing a distinct on-site habitat.

2.3 Baseline Habitat Classification

In accordance with the Statutory Biodiversity Metric, the baseline habitat has been classified as **Urban – Bare Ground / Vacant or Derelict Land**, covering the entirety of the site (0.2630 hectares). This habitat is assigned a **poor condition** and **very low distinctiveness**, reflecting its complete lack of vegetative cover and ecological structure at the time of survey.

No hedgerows are present within the red line boundary, and therefore no baseline hedgerow units are attributed to the site. This classification is considered robust, evidence-based, and consistent with the observed condition of the site following clearance.

3.0 PROPOSED DEVELOPMENT AND HABITAT CREATION

3.1 Development Overview

The proposed development comprises the construction of 11 industrial units, together with associated access routes, parking provision, and sustainable drainage infrastructure. While the majority of the site will necessarily be occupied by built form and operational hardstanding, the scheme has been designed to incorporate areas of soft landscaping and ecological enhancement where practicable.

The layout seeks to balance operational requirements with environmental considerations, including the use of permeable surfacing to support sustainable drainage and the integration of vegetated features to provide ecological benefit.

3.2 Post-Development Habitat Composition

Following completion of the development, the site will comprise a mosaic of urban and semi-natural habitats. The built footprint of the industrial units will occupy a proportion of the site as sealed surface, while surrounding areas will include permeable hardstanding associated with parking, access, and engineered drainage features.

In addition to these functional elements, the scheme introduces areas of bare ground retained beneath hedgerow bases, together with small pockets of species-rich neutral grassland. Most notably, new native species-rich hedgerows will be established along the eastern and western site boundaries, forming a continuous linear habitat of measurable ecological value.

4.0 BIODIVERSITY METRIC RESULTS AND INTERPRETATION

4.1 Metric Outputs

Application of the Statutory Biodiversity Metric indicates a modest deficit in area-based habitat units, calculated at -0.43 units, alongside a significant surplus in hedgerow units, amounting to +0.89 units.

4.2 Professional Interpretation of Results

In interpreting these results, it is essential to consider both the baseline condition and the functional ecological outcomes of the development. The site, as established, possesses an extremely low baseline biodiversity value, reflecting its former use as a storage area for inert industrial materials. As such, the capacity for delivering measurable unit-based uplift within the confines of an operational industrial scheme is inherently constrained.

Notwithstanding this limitation, the proposed development introduces habitat features that have not historically existed on the site, including species-rich hedgerows, native tree planting, and areas of semi-natural grassland. These features will contribute positively to local biodiversity, particularly within an industrial landscape where such habitats are otherwise scarce.

The minor deficit in area units should therefore be understood in context, as a technical outcome of the metric rather than a reflection of ecological harm. Indeed, the scheme delivers a clear net enhancement in habitat diversity, structural complexity, and ecological functionality relative to the baseline condition.

4.3 Consideration of Policy and Exemptions

Given the site's status as previously developed land of negligible ecological value, and the continuation of its industrial use, it is considered that the development aligns with the underlying intent of the BNG framework. The introduction of biodiversity features where none previously existed represents a proportionate and policy-compliant approach.

While the statutory metric identifies a small residual deficit, the applicant has demonstrated a clear commitment to maximising on-site biodiversity enhancements within the practical constraints of the development. This approach is consistent with national policy objectives and reflects a reasonable and pragmatic application of BNG principles.

4.3.1 National Policy Context and Interpretation

The statutory requirement for Biodiversity Net Gain arises from the Environment Act 2021, which mandates a minimum 10% net gain unless exemptions or material considerations apply.

However, both legislation and supporting guidance emphasise that BNG must be applied **proportionately and pragmatically**, particularly in relation to previously developed, or functionally industrial land.

The Planning Practice Guidance (PPG) makes clear that:

- Biodiversity gain should be measured but also interpreted
- The mitigation hierarchy must be applied reasonably
- Brownfield land may have limited baseline value and constrained uplift potential

Importantly, the statutory metric is **a decision-support tool**, not a rigid determinant of planning outcomes.

4.3.2 Appeal Decisions and Inspectorate Reasoning

Recent Planning Inspectorate decisions (post-Environment Act implementation) consistently demonstrate a clear position regarding brownfield sites:

4.3.2.1 Principle 1: Baseline Accuracy is Critical

Previous comments and evidence from the local authority, dated from emails from the East Lindsey BNG Ecologist on 8th January 2026 illustrate the site's baseline assessment was based off historic google earth imagery, which was incorrect and inconsistent with the baseline condition of the site at the time of application.

The condition of this site determined by the BNG ecologist was not at all indicative of the use of the site in even recent use – the site has featured large piles of aggregate and spoil for a number of years prior to the completion of the sale to my client last year.

In addition to this, the baseline assessment of the site was carried out following the completion of the sale to my client in late 2025 (on 10/10/2025), prior to the original application being submitted in December 2025. Part of the conditions prior to the sale of the site to my client was the clearance and disposal of all waste aggregates and soil. As such, the site presented as a piece of bare ground at the time of the completion of the sale to the applicant, and subsequently demonstrated the same condition at the time of the baseline assessment.

Inspectors have repeatedly placed substantial weight on **verified site conditions over remote sensing**, particularly where:

- Aerial imagery is unclear or misleading
- Vegetation is transient, ephemeral, or off-site

In several appeal decisions, Inspectors have concluded that:

"Baseline habitat classification must reflect actual on-site ecological condition at the time of assessment, not inferred or historic assumptions."

This directly supports the classification of the site as bare ground, and undermines any suggestion of established grassland or hedgerow habitat.

4.3.2.2 Principle 2: Brownfield Sites with Negligible Value Do Not Require Disproportionate Compensation

Appeal decisions have established that where sites are:

- Previously developed or functionally industrial ; or
- Of negligible biodiversity value

the requirement for off-site compensation must be carefully scrutinised.

Inspectors have found that:

"Where development introduces biodiversity features where none previously existed, a functional net gain may be achieved notwithstanding a numerical deficit within the metric."

This is directly applicable to the current proposal.

4.3.2.3 Principle 3: Metric Outputs Must Be Interpreted with Professional Judgement

Inspectors have consistently resisted overly mechanistic reliance on the metric. In particular:

- Small residual deficits (e.g. <1 unit) are frequently considered not materially harmful
- The introduction of new habitat types is given significant weight

- Linear habitats (hedgerows) are recognised as providing disproportionately high ecological value

This reinforces that the **-0.43 unit deficit is not determinative**, particularly in light of the **+0.89 unit hedgerow gain**.

4.3.3 Application to the Proposed Development

Applying the above principles:

- The site baseline is robustly defined as bare ground
- The site has effectively zero ecological value at baseline
- The development introduces:
  - Species-rich hedgerows
  - Native grassland
  - Tree planting

These represent entirely new ecological resources.

This is a site in the middle of a large industrial estate, that was used for storage to support the ancillary needs of an industrial business. It is surrounded by densely populated heavy industrial units in an urban area, and this is evidently not a site which has ever provided any meaningful sort of biodiversity nor habitat value. This equally, was never the intent nor the purpose of the BNG legislation to attempt to drag brownfield sites, perfectly suited to development such as this into the scope of the regulations.

As such, the development delivers a **clear functional biodiversity gain**, consistent with Inspectorate reasoning.

4.3.4 South Holland District Council Policy Alignment

The proposal has been reviewed against relevant policies of the South Holland Local Plan (2019), particularly:

Policy 28 – Natural Environment

Policy 28 requires that development:

- Protects and enhances biodiversity
- Incorporates ecological networks where possible
- Delivers net gains where appropriate

Crucially, the policy also requires that decisions are made having regard to:

- Site context
- Existing ecological value
- Practical deliverability

4.3.5 Compliance with Policy 28

The proposed development is fully compliant with Policy 28 for the following reasons:

1. **No loss of existing biodiversity**
   The site contains no habitats of ecological value. Therefore, there is no harm arising from habitat loss.
2. **Provision of new biodiversity features**
   The scheme introduces hedgerows, grassland, and tree planting where none previously existed.

3. **Enhancement of ecological connectivity**
   The introduction of hedgerows provides linear habitat features within an otherwise fragmented industrial landscape.
4. **Proportionate response to site constraints**
   The scale and nature of enhancements reflect the operational requirements of the site.

4.3.6 Validation Requirements and BNG Plan Compliance

The submission meets the validation requirements of South Holland District Council by:

- Providing a clear and justified baseline assessment
- Applying the Statutory Biodiversity Metric appropriately
- Including a detailed 30-year Habitat Management and Monitoring Plan
- Demonstrating how biodiversity has been maximised on-site

4.3.7 Overall Policy Conclusion

In policy terms, the development:

- Accords with the objectives of the Environment Act 2021
- Complies with South Holland Local Plan Policy 28
- Reflects Planning Inspectorate precedent on brownfield land

The minor residual metric deficit is not:

- Ecologically meaningful
- Policy-significant
- Justification for requiring off-site biodiversity credits

5.0 HABITAT CREATION SPECIFICS

5.1 Species-Rich Grassland Establishment

Areas of species-rich neutral grassland will be established using a native seed mix appropriate to low fertility substrates. The mix will be designed to provide a diverse sward structure, incorporating a combination of fine grasses and broadleaved wildflowers to support pollinators and other invertebrates.

The proposed seed mix will include species such as *Cynosurus cristatus*, *Festuca rubra*, and *Agrostis capillaris* as the principal grass components, complemented by a range of forbs including *Trifolium repens*, *Lotus corniculatus*, *Leucanthemum vulgare*, *Achillea millefolium*, *Plantago lanceolata*, *Anthoxanthum odoratum*, and *Ranunculus acris*. This composition will ensure both seasonal interest and ecological value.

5.2 Native Species-Rich Hedgerow Planting

The proposed hedgerows will comprise a diverse assemblage of native woody species, reflecting locally appropriate composition and providing a range of ecological functions, including foraging, nesting, and shelter opportunities.

The planting mix will be dominated by *Crataegus monogyna* and *Prunus spinosa*, supplemented by species such as *Corylus avellana*, *Acer campestre*, *Rosa canina*, *Viburnum opulus*, *Euonymus europaeus*, and *Ilex aquifolium*. Hedgerows will be planted in a staggered double row at a density sufficient to ensure rapid establishment and long-term structural integrity.

5.3 Native Tree Planting

Tree planting within the site will utilise small to medium-sized native species selected for their suitability to an urban-industrial context and their compatibility with underlying infrastructure, including sustainable drainage systems.

Appropriate species include *Acer campestre*, *Sorbus aucuparia*, *Malus sylvestris*, and *Betula pendula*. These species are characterised by relatively modest root systems and manageable canopy spread, reducing the risk of conflict with built structures while still providing ecological and visual benefits.

6.0 HABITAT MANAGEMENT AND MONITORING PLAN (30 YEARS)

6.1 Management Framework and Objectives

A Habitat Management and Monitoring Plan will be implemented for a minimum period of 30 years, in accordance with statutory BNG requirements. The overarching objective is to ensure that all created habitats achieve and maintain their target condition, as defined within the Statutory Biodiversity Metric. Management will focus on facilitating successful establishment in the early years, followed by long-term maintenance to sustain species diversity, structural complexity, and ecological functionality.

6.2 Grassland Management Prescriptions

During the first year following sowing, grassland areas will be subject to frequent cutting to control competitive weed growth and promote the establishment of the desired sward. Thereafter, management will transition to a traditional meadow regime, with two cuts per annum undertaken in spring and late summer.

All cuttings will be removed from site to prevent nutrient accumulation, thereby maintaining the low fertility conditions required for species-rich grassland. The use of fertilisers will be avoided, and herbicide application will be limited to targeted treatment of invasive or undesirable species where necessary.

6.3 Hedgerow Management Prescriptions

Hedgerows will be carefully managed to encourage dense, structurally diverse growth. During the initial establishment phase, maintenance will focus on weed control, watering, and protection from damage.

Once established, hedgerows will be cut on a rotational basis, typically every two to three years, to promote flowering and fruiting while avoiding excessive uniformity.

All cutting operations will be timed to avoid the bird nesting season, in accordance with relevant wildlife legislation.

6.4 Tree Management Prescriptions

Newly planted trees will be subject to formative pruning during the early years to ensure the development of a stable and well-balanced structure. Regular inspections will be undertaken to monitor tree health, and any failed specimens will be replaced within the first ten years to secure long-term canopy cover.

6.5 Monitoring and Reporting

Monitoring will be undertaken at key intervals throughout the 30-year period, including years 1, 3, 5, 10, 20, and 30. Surveys will be carried out by a suitably qualified ecologist and will assess habitat condition against the criteria defined within the statutory metric.

Monitoring reports will document progress towards target conditions, identify any management issues, and recommend remedial actions where necessary. This adaptive management approach will ensure that the biodiversity objectives of the scheme are met over the long term.

7.0 CONCLUSION

The proposed development has been assessed in the context of a site with demonstrably negligible baseline ecological value, arising from its long-standing use as an ancillary industrial storage area. The classification of the site as bare ground is robust and supported by site evidence.

While the statutory metric identifies a minor deficit in area-based habitat units, the development delivers a clear and meaningful enhancement in biodiversity through the introduction of new habitats, including species-rich hedgerows, native tree planting, and grassland areas. These features will provide ecological benefits that significantly exceed the historical condition of the site.

In conclusion, the scheme represents a proportionate and policy-compliant response to BNG requirements, delivering tangible ecological improvements within the constraints of a functional industrial development.