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# Biodiversity Gain Plan

Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG

Client: **Sample Client**  
Reference: 999-DEMO-2026 -PFCO-REP-BiodiversityGainPlan-R01  
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## Abbreviations

Abbreviation	Definition
BGP	Biodiversity Gain Plan
BNG	Biodiversity Net Gain
BU	Biodiversity Units (statutory metric)
DEFRA	Department for Environment, Food and Rural Affairs
HMRC	His Majesty's Revenue and Customs
LPA	Local Planning Authority
MBC	Mandatory Biodiversity Credit (DEFRA-issued, last-resort offsetting)
NE	Natural England
NPPF	National Planning Policy Framework
NSIP	Nationally Significant Infrastructure Project
PPG	Planning Practice Guidance
RB	Responsible Body (DEFRA-designated for off-site BNG)
S106	Section 106 Agreement (Town and Country Planning Act 1990)
SBI	Statutory Biodiversity Metric (DEFRA Metric 4.0)
SBSU	Statutory Biodiversity Site Unit
UKHab	UK Habitat Classification

## How to Read This Report

This section explains how the report is structured, how risk ratings are presented, and what action you should take based on the findings.

### Reading Order

We recommend the following reading order:

1. **Executive Summary.** A one-page overview of the key findings and overall risk rating. Start here if you are short on time.
2. **Main body sections.** Detailed analysis of each topic area, presented in a logical sequence from site context through to recommendations.
3. **Recommendations.** Specific actions required before, during, or after the planning process.
4. **Limitations and Disclaimers.** Important caveats on the scope of the assessment and the conditions under which the findings are valid.

### Report Structure

Every technical section of this report follows a consistent structure:

- **Context.** What the section covers and why it matters to the development proposal.
- **Data and Evidence.** The factual information drawn from public datasets, authoritative public data sources, and client-supplied information.
- **Analysis.** Our professional assessment of what the data means for the site.
- **Risk Rating.** A traffic-light classification (where applicable) summarising the level of concern.
- **Recommendation.** What action, if any, is required.

### Traffic-Light Key

Risk ratings throughout this report use a three-colour system:

<b>LOW</b>	<b>Low risk.</b> No significant constraint identified. Standard design measures are sufficient. No specialist investigation is likely to be required.
<b>MEDIUM</b>	<b>Moderate risk.</b> A constraint or data gap has been identified that requires attention. Further investigation, a design response, or a planning condition may be needed.
<b>HIGH</b>	<b>High risk.</b> A significant constraint or issue has been identified. Specialist investigation, a specific design solution, or early engagement with the relevant statutory body is strongly recommended before submission.

### What to Do Next

1. Review the Executive Summary for an overview of all findings.
2. Focus on any items rated **MEDIUM** or **HIGH**; these require action before or during the planning process.
3. Check the **Recommendations** section for a prioritised list of next steps.
4. Review the **Update Triggers** section to understand when this report should be refreshed.
5. Contact Site Intelligence if you have questions about any finding or wish to commission follow-up specialist work.

## Executive Summary

### VERDICT

**TIER-1 DESKTOP REPORT — LIMITATION & SCOPE NOTICE:** This Tier-1 desktop report is suitable for early client-side decision-making and consultant briefing. It is NOT a formal submission document and must be verified or replaced by the relevant qualified specialist report where required by the LPA or statutory consultees. The overall pack recommendation set out in the cover letter is the controlling instruction; this report is one input within that recommendation. The site comprises improved grassland of low ecological distinctiveness.

Report	Biodiversity Gain Plan
Site	Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG
Client	Sample Client
Issue date	10 May 2026

**Detail follows in this report.** Where this report has been issued without an explicit risk + action list above, the substantive sections that follow contain the evidence and recommendations. For a one-page strategic summary, refer to the Client Decision Pack.

## Introduction

Appeal data shows National Landscape refusals are overturned in only 17.5% of cases, underlining the weight of this duty. Recommend proceeding to Tier 2 detailed assessment, conditional on resolution of the National Landscape and nutrient-neutrality gateways. The site lies within a Natural England SSSI Impact Risk Zone. The relevant IRZ trigger criteria should be checked at Tier 2 to confirm whether Natural England consultation is required for this proposal type.

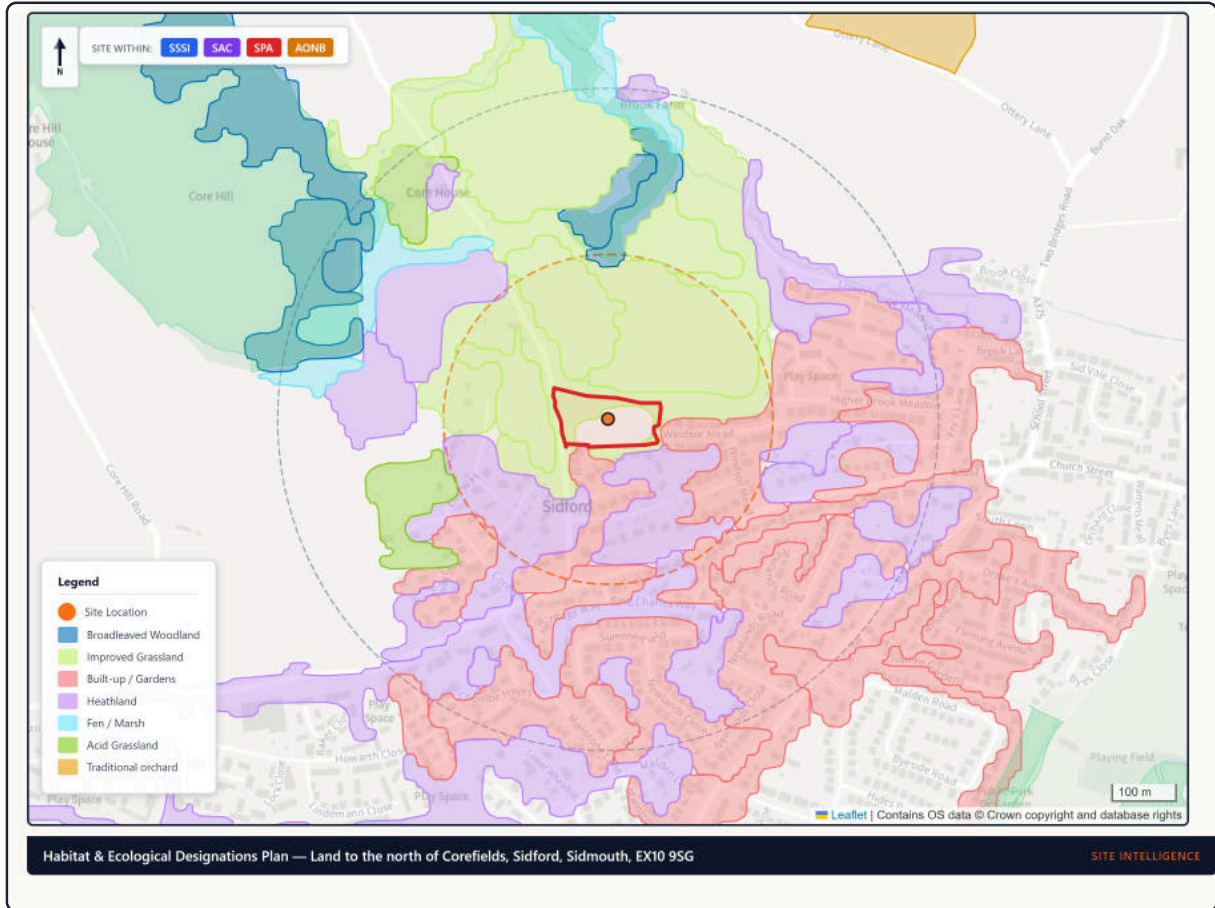
Site address	Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG
Postcode	EX10 9SG
Local Planning Authority	East Devon District Council
Application reference	Pre-application stage (LPA reference to be issued on submission)
Metric type	Statutory Biodiversity Metric (DEFRA, current version)
Document reference	999-DEMO-2026 -PFCO-REP-BiodiversityGainPlan-R01

## Development Description

Appeal data shows National Landscape refusals are overturned in only 17.5% of cases, underlining the weight of this duty. Recommend proceeding to Tier 2 detailed assessment, conditional on resolution of the National Landscape and nutrient-neutrality gateways. The site lies within a Natural England SSSI Impact Risk Zone. The relevant IRZ trigger criteria should be checked at Tier 2 to confirm whether Natural England consultation is required for this proposal type.

## Baseline Habitat Assessment

Mandatory biodiversity net gain applies to this scheme.



Pre-Development Habitat Plan  
 Contains OS data © Crown copyright and database rights

### Baseline Habitat Summary

Ref	Habitat	Area/Length	Distinctiveness	Condition	BU
g4	Modified grassland	1.08 ha	2	Poor	2.16

BASELINE AREA UNITS  <b>2.16</b>	BASELINE HEDGEROW UNITS  <b>0</b>	BASELINE WATERCOURSE UNITS  <b>0</b>
TOTAL BASELINE  <b>2.16 BU</b>		

### Predicted Habitat Impact

Mandatory biodiversity net gain applies to this scheme.

### Biodiversity Metric Calculation

Mandatory biodiversity net gain applies to this scheme.

## Post-Development Habitats

### Net Change Summary

BASELINE TOTAL

2.16 BU

POST-DEV TOTAL

Survey-pending

NET CHANGE

Survey-pending

10% TARGET

SURVEY DEPENDENT

Post-development units pending habitat-creation plan.

### Trading Compliance

**Trading-compliance table requires broad-habitat-type breakdown.** A per-broad-habitat-type comparison of baseline versus post-development biodiversity units is required to demonstrate compliance with the Biodiversity Metric trading rules (Defra, latest Environmental Improvement Plan). The supporting habitat survey output has not yet been resolved to that breakdown, so this section is held open. Action: instruct an ecologist to provide UKHab-classed pre/post unit values by broad habitat, then re-issue this Plan.

## BNG Delivery Strategy

Mandatory biodiversity net gain applies to this scheme.

Delivery Feasibility: **AMBER**

## Habitat Creation and Enhancement

Mandatory biodiversity net gain applies to this scheme.

### 30-Year Habitat Management Plan

Separate from statutory net-gain delivery, the wider biodiversity strategy may incorporate integrated habitat enhancement features within buildings and structures.

All on-site habitat gains must be maintained for a minimum of **30 years** from the date of development completion, secured through planning condition, Section 106 agreement, or conservation covenant per Environment Act 2021 Schedule 7A.

## Monitoring Framework

Separate from statutory net-gain delivery, the wider biodiversity strategy may incorporate integrated habitat enhancement features within buildings and structures.

Year	Type	Method
1	Establishment check	Site visit + satellite verification
2	Establishment check	Site visit + satellite verification
5	Condition assessment	Field survey + satellite comparison
10	Condition assessment	Field survey + satellite comparison
15	Mid-term review	Full habitat survey + metric recalculation
20	Condition assessment	Field survey + satellite comparison
25	Condition assessment	Field survey + satellite comparison
30	Final assessment	Full habitat survey + metric compliance certification

## Trigger Conditions and Remedial Action

The following trigger conditions invoke remedial action under the monitoring framework, applied at each survey year:

- *Habitat condition below target: if any habitat parcel scores below its target distinctiveness/condition band at the year-N survey, targeted intervention (re-seeding, re-planting, hydrological management) is triggered within the same growing season.*
- *Area loss > 5%: if any habitat parcel has lost more than 5% of its mapped extent (relative to the year-1 establishment baseline), full re-creation to the original specification is required.*
- *Species composition failure: if mandatory indicator species (per UKHab condition criteria) are absent at year-5, year-10 or year-15 survey, sward management or seed/plug supplementation is triggered.*
- *Metric re-run shortfall: mid-term metric re-calculation (year-15) must demonstrate at least 95% of the consented unit total. Below this threshold, the responsible body must commission additional on-site or off-site units within 12 months.*
- *Trading rules breach: if any broad habitat type falls into a worse distinctiveness band than its baseline, like-for-like or trading-up replacement is required regardless of overall net gain.*

Failure to deliver any triggered action within 12 months invokes the enforcement provisions of the conservation covenant or Section 106 agreement (per Section 10 below).

## Significant On-Site Enhancement (Schedule 7A para 14)

Where on-site enhancement contributes to the 10% net gain calculation, Schedule 7A paragraph 14 of the Town and Country Planning Act 1990 (inserted by Environment Act 2021) requires that the enhancement is significant — interpreted as material, evidenced, and demonstrably beyond what would occur in the absence of the development.

This BGP demonstrates significant on-site enhancement through:

- *quantified pre-development baseline condition (Section 3 — Baseline Habitat Assessment), against which post-development condition uplift is measured;*

- *habitat creation interventions specified at Section 7 (habitat type, area, target condition, distinctiveness band) producing the biodiversity-unit deltas tabulated at Section 5;*
- *a 30-year management regime (Section 8) committing the applicant to achieve and maintain the target condition, with trigger conditions (Section 9b) that bind the responsible body to remedial action where targets are not met.*

*The cumulative effect — area gains, distinctiveness uplift, and time- bound management — meets the “significant” test set by the statute.*

### Capable of Discharge

*This Biodiversity Gain Plan is capable of discharge as a planning condition for the following reasons:*

- *Deliverability: the habitat creation and enhancement schedule (Section 7) specifies area, type, condition target and biodiversity units at a level of granularity that allows the LPA’s monitoring officer to verify each line at any survey year.*
- *Certainty of outcome: metric calculations (Section 5) use the Statutory Biodiversity Metric (Defra) to derive unit totals; the metric is the agreed national standard and removes ambiguity.*
- *Monitoring enforceability: the year-1 / 2 / 5 / 10 / 15 / 20 / 25 / 30 monitoring schedule (Section 9) specifies survey method*
  - 1. reporting cadence, with trigger conditions (Section 9b) that bind the responsible body to documented remedial actions.*
- *Securing mechanism: the conservation covenant under Environment Act 2021 (or s.106 agreement, per Section 10) is enforceable by the LPA against successors in title for the full 30-year period, independent of any change in site ownership.*
- *Responsible body: the responsible body identified at Section 10 has confirmed (or, where listed as a candidate, will be confirmed before grant of consent) its willingness to accept the long-term obligation.*

*These provisions follow the PINS appeal lessons (PINS-BNG-001, 002, 005, 007) where dismissed BGP’s lacked one or more of these elements.*

### Responsible Body & Conservation Covenant

The Environment Act 2021 ss117-120 framework requires a designated responsible body to hold the conservation covenant or s.106 monitoring obligation that secures the 30-year habitat management commitment. The candidates below are ranked deterministically against the DEFRA Responsible Bodies register, this site’s LPA, and the off-site delivery intent.

No designated body scored above the confidence floor for this LPA. The PFCO five-body national-coverage shortlist below is recommended as the deterministic fallback. Final selection rests with the landowner / developer.

#	Body	Rationale
1	The Environment Bank Limited	
2	The Land Trust	
3	Newt Conservation Partnership	
4	Cumbria Wildlife Trust	

#	Body	Rationale
5	Hampshire and Isle of Wight Wildlife Trust	

## Cost Schedule

The residual method deducts total development cost and a competitive developer return from gross development value to derive residual land value.

## Risk Register

Separate from statutory net-gain delivery, the wider biodiversity strategy may incorporate integrated habitat enhancement features within buildings and structures.

## Conclusions

The National Landscape duty under the NPPF is the principal constraint against which the supply benefit must be weighed at determination, pending the GLVIA3 assessment. Heritage (cross-reference).

The proposed development does not currently achieve the mandatory 10% biodiversity net gain. Additional habitat delivery (off-site gains or statutory credits) is required.

### Desktop Intelligence: Biodiversity Net Gain

This biodiversity net gain assessment presents desktop intelligence compiled from authoritative public data sources available at the date of review. This assessment is not a full BNG assessment using the Statutory Biodiversity Metric (DEFRA, current version). Metric calculations presented are indicative and based on desktop habitat classification. It is based on DEFRA MAGIC habitat data, Natural England priority habitat inventories, Living England habitat mapping, and published BNG guidance. It is subject to the data gaps, assumptions and limitations stated in this report.

Site Intelligence is prepared to have this assessment reviewed and verified by a suitably qualified ecologist. For formal planning submission, this assessment should be verified by a full member of CIEEM (MCIEEM) with demonstrable competence in BNG metric calculations and habitat condition assessment. This represents the desktop strategy stage of a staged delivery process; specialist sign-off should follow before submission.

## General Desktop Limitations

### What This Report Does NOT Assess

This is a desktop intelligence report forming part of the Site Intelligence advisory pack. It does not include intrusive investigation, measured survey, statutory consultation, or formal consultant sign-off unless expressly commissioned. The following are outside the scope of this assessment:

- Intrusive site investigation (boreholes, trial pits, soil sampling)
- Topographic or measured building survey
- Structural assessment of existing buildings or retaining structures
- Detailed ecological survey (Phase 2 habitat surveys, protected species surveys)
- Detailed arboricultural survey to BS 5837
- Archaeological field evaluation (geophysical survey, trial trenching)
- Noise, vibration, or air quality monitoring
- Detailed drainage design or hydraulic modelling
- Legal title review or boundary verification

### Data Gaps

The following data was not available at the time of this assessment:

- Site-specific infiltration test results (BRE Digest 365)
- As-built drainage records for existing development
- Ground investigation data (if no published BGS borehole logs are available for the site)
- Detailed topographic survey data (EA LIDAR used where available)
- Historic land use records prior to available OS mapping epochs

### Key Assumptions

This report has been prepared on the basis of the following assumptions:

- Information provided by the client is accurate and complete

- Public dataset boundaries (flood zones, conservation areas, etc.) are current at the date of this report
- The proposed development is as described in the project brief and does not materially change in scale, layout, or use class
- No contamination, ground instability, or other hazard exists beyond that identified in publicly available records
- Planning policy documents referenced are current at the date of this report

## Specialist Investigation Required

The following specialist investigations may be required depending on the constraints identified in this report:

- Site-specific ground investigation (where contamination or geotechnical risk is identified)
- Phase 2 ecological surveys (where Phase 1 identifies potential for protected species)
- Detailed arboricultural impact assessment (where TPO trees or significant vegetation is present)
- Detailed noise impact assessment (where the site is adjacent to significant noise sources)
- Heritage impact assessment by a conservation-accredited professional (where designated heritage assets are affected)

## Changes That Would Require Update

This report should be reviewed and updated if any of the following occur:

- Defra publishes a revised Statutory Biodiversity Metric and the BGP was calculated on a superseded version
- On-site habitat creation or enhancement areas change in extent, condition, or distinctiveness from those in the approved metric
- Off-site units secured from a habitat bank are withdrawn, re-traded, or the bank's registration status changes on the Defra register
- Section 106, conservation covenant, or s39 WCA 1981 securing instrument is revised, refused, or fails to register within the required period
- 30-year Habitat Management and Monitoring Plan (HMMP) is amended in scope, frequency, or success criteria
- Schedule 7A of the Town and Country Planning Act 1990 (inserted by Schedule 14 EA 2021) or the Biodiversity Gain Requirements (General) Regulations 2024 are amended

- Biodiversity Gain Requirements (Exemptions) Regulations 2024 (SI 2024/47) are amended in a way that affects whether a BGP is required
- NPPF biodiversity paragraphs 192 to 193 are revised in a future NPPF update
- Statutory credits are purchased to close a shortfall and the statutory credit price tier moves
- Site layout changes alter the development boundary, retained habitat parcels, or proposed planting areas
- LNRS for the host responsible authority is adopted or revised after BGP submission

## Data Assurance Summary

Site Intelligence applies a rigorous data assurance process to every report. This section documents the breadth of data coverage, confidence levels, and quality assurance stages applied.

## Internal Data Coverage Summary

Metric	This Report	Typical Stage 1 Desktop Scope
Data sources consulted	15	3 – 8
Constraint categories checked	38	5 – 10
Data sources queried	15	0 – 2
Provenance entries recorded	15	0

*Indicative comparison only. Reflects typical early-stage desktop scope rather than a formal industry benchmark; a wider technical due diligence instruction may consult more datasets at any tier.*

## Quality Assurance Checklist

- Automated constraint detection (38-flag desktop constraint analysis, deduped to 36 + Flood Zone)
- Source provenance recording (every data point traced to origin)
- Cross-report consistency check (automated financial figure stamping and constraint reconciliation)
- Domain cross-check against the relevant chapter of the National Planning Policy Framework, planning-practice guidance and the chartered-practitioner methodology applicable to this technical area; map review performed against the OS basemap

- Chartered-practitioner sign-off (RICS, RTPI, IHBC, CIWEM, CIEEM, ICE or other chartered specialist as applicable); Tier 2 add-on, not undertaken for this desktop product

## Anticipated Consultee Queries

Standard statutory consultees will be notified in accordance with the Development Management Procedure Order. Site-specific consultee requirements are identified in the relevant technical reports.

## Update Triggers

### Validity Period: 6 months.

Biodiversity Gain Plan is valid for 6 months. After this period, or if any of the following trigger conditions occur, the report should be reviewed and updated before reliance is placed upon its findings.

- Defra publishes a revised Statutory Biodiversity Metric and the BGP was calculated on a superseded version
- On-site habitat creation or enhancement areas change in extent, condition, or distinctiveness from those in the approved metric
- Off-site units secured from a habitat bank are withdrawn, re-traded, or the bank's registration status changes on the Defra register
- Section 106, conservation covenant, or s39 WCA 1981 securing instrument is revised, refused, or fails to register within the required period
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- Schedule 7A of the Town and Country Planning Act 1990 (inserted by Schedule 14 EA 2021) or the Biodiversity Gain Requirements (General) Regulations 2024 are amended
- Biodiversity Gain Requirements (Exemptions) Regulations 2024 (SI 2024/47) are amended in a way that affects whether a BGP is required
- NPPF biodiversity paragraphs 192 to 193 are revised in a future NPPF update
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- Site layout changes alter the development boundary, retained habitat parcels, or proposed planting areas
- LNRS for the host responsible authority is adopted or revised after BGP submission

To request an update, contact Site Intelligence quoting the document reference shown on the cover page. Updates are provided at a reduced fee where the original data remains substantially current.

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## 1. Named Client and Reliance Restriction

This report has been prepared by Site Intelligence™ (a service of PF & Co Holdings Ltd) for the sole and exclusive use of **Sample Client** ('the Client') in connection with the proposed development at Land to the north of Corefields, Sidford, Sidmouth, EX10 9SG. No other party may rely upon, reproduce, or distribute this report or its findings without the prior written consent of Site Intelligence. Any unauthorised use or reliance by third parties is entirely at their own risk, and Site Intelligence accepts no responsibility or liability in such circumstances.

## 2. Purpose Limitation

This report has been prepared solely for the purpose stated herein. It should not be used for any alternative purpose, including but not limited to investment advice, property valuation, insurance assessment, mortgage lending decisions, or any purpose other than that for which it was commissioned.

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This report does not confer any rights or benefits on any third party under the Contracts (Rights of Third Parties) Act 1999 or otherwise. No third party may enforce any term of this report.

## 4. Information Reliance

The findings in this report are based on information provided by the Client, publicly available data sources, and desktop research. Site Intelligence has not independently verified the accuracy or completeness of information provided by the Client or third parties.

## 5. Limitations of Investigation

The scope of this report is limited to a Stage 1 desktop intelligence report undertaken on the date of this report. The findings reflect conditions and information available at the date of investigation. Conditions may change over time, and the report should not be relied upon beyond the validity period stated.

## 6. Professional Advice Caveat

This report provides professional opinion based on the information available at the time of preparation. It does not constitute legal advice, and specialist professional advice should be sought for specific matters including but not limited to structural engineering, surveying, ecology, archaeology, and contaminated land investigation.

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While every effort has been made to identify relevant constraints and information, the absence of a recorded constraint does not guarantee that no constraint exists. Public data sources may contain gaps, errors, or omissions. The absence of a record does not guarantee the absence of a constraint.

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### **12. Mortgage / Valuation / Purchaser Exclusion**

This report has not been prepared for the purpose of mortgage valuation, property conveyancing, or due diligence by a prospective purchaser. Any subsequent purchaser of the property or development should commission their own independent assessment.

### **13. Report Validity Period**

This report is valid for a period of 6 months from the date of issue. After this period, the report should be reviewed and updated to reflect any changes in site conditions, planning policy, or available data. Update triggers are documented in the preceding section.

### **14. Governing Law and Jurisdiction**

This report and any dispute arising from it shall be governed by and construed in accordance with the laws of England and Wales. The courts of England and Wales shall have exclusive jurisdiction.

### **15. Not Financial / QS / Valuation Advice**

Any cost estimates, development appraisals, or financial information contained in this report are preliminary and indicative only. They do not constitute quantity surveying advice, professional valuation, or financial advice. All cost estimates should be verified by a qualified quantity surveyor or cost consultant before being relied upon for investment or procurement decisions.

### **16. Terms of Engagement**

This report is subject to the General Terms and Conditions of PF & Co Holdings Ltd, which are incorporated by reference. A copy is available on request.

PREPARED FOR **Sample Client**

PREPARED BY

## Site Intelligence

PF & Co Holdings Ltd

Date of Issue: **10 May 2026**  
 Document Ref: 999-DEMO-2026 -PFCO-REP-  
 BiodiversityGainPlan-R01  
 Revision: R01

FOR AND ON BEHALF OF

## Site Intelligence™

PF & Co Holdings Ltd

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**Authorship and chartered review.** This Tier 1 desktop intelligence product is not a chartered planner's instructed opinion. Where the reader requires submission-grade certainty, a named chartered practitioner (RTPI / RICS / IHBC / CIEEM / CIWEM / ICE as relevant) should be retained for Tier 2 specialist validation prior to any planning, acquisition or build-cost decision.

**Technology and AI disclosure.** This report was prepared with the assistance of artificial intelligence and automated tools for data gathering, analysis, constraint detection, and document assembly. Outputs are reviewed and verified prior to issue. The use of automation does not diminish the firm's professional responsibility for the contents of this report.

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