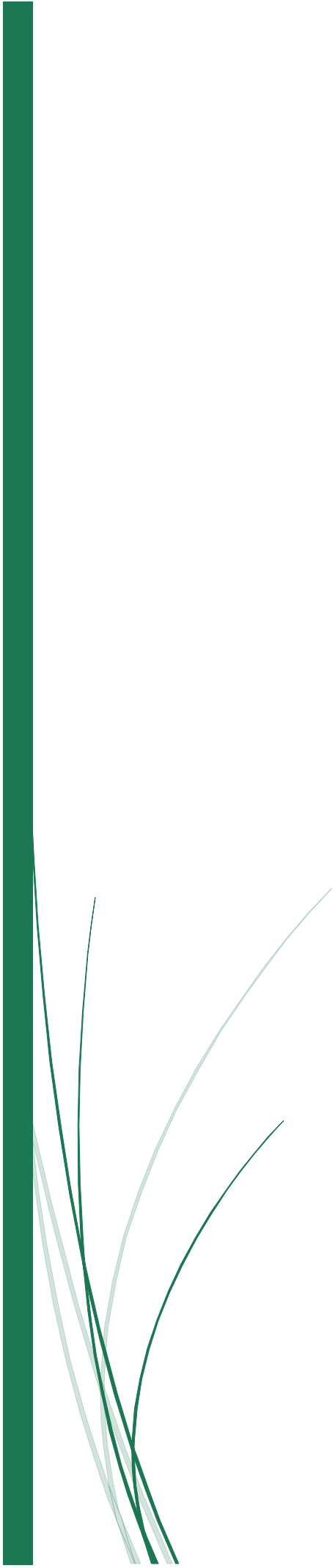




Hindsland Playing Fields, Eastbourne Road, Willingdon, East Sussex

Biodiversity Net Gain Assessment

A Report for Danescroft (FREOF V
Willingdon) LLP

June 2022



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Hindsland Playing Fields, Eastbourne Road, Willingdon, East Sussex

Biodiversity Net Gain Assessment

June 2022

Controlled Copy

01 of 02

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The content of this report is the responsibility of Greenspace Ecological Solutions Ltd. No part of this report constitutes legal advice.

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1 PROJECT OVERVIEW

Client:	Danescroft (FREOF V Willingdon) LLP
Site Address:	Former Hindsland Playing Fields, Eastbourne Road, Willingdon, BN20 9NY
Site Proposals:	Outline Application with all matters reserved except for access (excluding internal estate roads beyond the access to serve the medical centre plot) for demolition of existing vacant dwelling and erection of up to 180 no. dwellings and medical centre together with all parking, servicing and on-site open space.
Associated Planning Reference Number:	WD/2021/0594/MEA
Source of Relevant Documents:	

Document:	Source:
Associated Report(s):	Ecological Assessment (GES, April 2021) Update Preliminary Ecological Appraisal (GES, June 2022)
Site Plans:	Proposed Tree Locations drawing no. DANE23096_09 (ACD Environmental, June 2022) Indicative Coloured Site Layout: Hindsland, Eastbourne Road Willingdon, East Sussex 20089 / C101 (March 2021, OSP Architecture)

2 INTRODUCTION

2.1 Context

2.1.1 Prepared on behalf of Danescroft (FREOF V Willingdon) LLP, the following report sets out the result of the Natural England (NE) Biodiversity Metric 3.1 assessment undertaken for Hindsland, Eastbourne Road, Willingdon, East Sussex (hereafter referred to as the 'Site').

2.1.2 In accordance with the National Planning Policy Framework (NPPF) proposals should seek to demonstrate Biodiversity Net Gain (BNG). The NPPF states plans should '*promote 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*'. Therefore, in line with the National Planning Policy Framework (NPPF) 2021, the following report serves to satisfy the requirement for 'securing measurable net gains' for biodiversity within the Site post-development.

2.1.3 Natural England state that "*The Biodiversity Metric 3.1 provides a way of measuring and accounting for biodiversity losses and gains resulting from development or land management change. Biodiversity Metric 3.1 updates and replaces the Defra Biodiversity Metric 3.1.*

The Biodiversity Metric 3.1 encompasses both area (e.g., grasslands) and linear (such as rivers and streams) habitats.

Biodiversity metric 3.1 is designed to quantify biodiversity to inform and improve planning, design, land management and decision-making. It can be used to both:

- *Assess or audit the biodiversity unit value of an area of land; and*
- *Calculate the losses and gains in biodiversity unit value from changes or actions which affect biodiversity, such as building houses or changing the conservation management of a land holding."*

2.1.4 This report presents an assessment of Biodiversity Net Gain for the submitted proposals, as of 21st March 2021 (Wealden Planning Portal Reference: WD/2021/0594/MEA) for the demolition of existing vacant dwelling and erection of up to 180 no. dwellings and medical

centre together with all parking, servicing, and on-site open space at the Site¹. This assessment has been undertaken using the Natural England Biodiversity Metric 3.1.

2.2 Site location

- 2.2.1 The Site is situated within the village of Willingdon, East Sussex, at National Grid Reference TQ584041.

2.3 Site description

- 2.3.1 The Site is bound by residential properties to the north, agricultural land to the east, the A2270 Eastbourne Road to the west and south, with a parcel of open green space to the north-west. The village of Willingdon lies further to the north, south, and west of the Site, with agricultural land to the east, consisting primarily of pasture and hedgerows. The wider landscape is one of urban areas, agricultural land with an interconnecting network of hedgerows, and scattered woodland blocks.

UK Planning Policy

- 2.3.2 The recommendations of this report are in line with the key principles of the NPPF 2021 which states in part that:

“Para 174: Planning policies and decisions should contribute to and enhance the natural and local environment by: (d.) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures

Para 179: Plans should: (b.) promote 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 and development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

Para 180: When determining planning applications, local planning authorities should apply the following principles: (d.) development whose primary objective is to conserve or enhance

¹ Please note that this report serves to inform an outline application for the Site and may be subject to change prior to construction, should it be deemed necessary for project delivery during the determination of the detailed planning application.

biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate. “

2.4 Objectives of Biodiversity Net Gain

2.4.1 The objectives of using the Biodiversity Net Gain approach were to:

- Ascertain the ecological value of the habitats currently present within the Site.
- Calculate the value of each habitat to be lost, retained, enhanced, or created, as well as to provide recommendations regarding each in terms of the requirement for a Site-wide ‘Net Gain’ in ecological value post-development.

2.5 Constraints

2.5.1 The BNG Metric 3.1 is limited to working with areas measured in hectares to a maximum of two decimal places, therefore any feature with an area of less than 0.01ha is unable to be factored in using the current system and was therefore excluded from the assessment.

2.5.2 Although every effort has been taken to accurately measure the extent of all habitats discussed herein, all measurements and indications of area given within this report remain approximate.

3 METHOD

3.1 Biodiversity Metric 3.1

- 3.1.1 The steps taken to calculate the BNG baseline and proposed development calculations followed those within the BNG Metric 3.1 User Guide and Technical Supplement and are outlined below.

Baseline Calculation

- 3.1.2 The baseline habitat data required to inform the BNG Assessment was collected during the Update Preliminary Ecological Appraisal (PEA) that was conducted by the competent and suitably experienced senior ecologist/ornithologist Martin Rann BSc (Hons) ACIEEM of Greenspace Ecological Solution Ltd on 23rd April 2022. Serving to determine the different land uses across the site and enabling identification of any areas of higher biodiversity interest (i.e., areas of Priority Habitat or features with potential to support protected species), this data was supported by the findings of the associated desk study which served to determine the proximity of historical records of conservation interest within and around the site. The results of the PEA are reported separately (GES, 2022).
- 3.1.3 To ensure compliance with the requirement of the BNG assessment and to determine the appropriate habitat classification and condition assessment, the field data collected during that PEA was subsequently converted for use in the metric using UK Habitat Classification (UK Hab) criteria.
- 3.1.4 As stated in the User Guide (Panks *et al*, 2022) *“The terrestrial area habitats in biodiversity metric 3.1 are largely based on the UK Habitat Classification system, a free-to-use (open access), unified and comprehensive approach to classifying habitats that is fully compatible with other major existing classifications. It is designed to be suitable for digital or manual use in habitat metrics, impact assessment and sharing data between organisations. The UK Habitat Classification system was chosen for use in the metric as it translates easily into Priority Habitat types and Habitats Directive Annex 1 types; has scope to incorporate assessments of condition, origin or management regime; and is compatible with digital mapping systems. The habitat list within biodiversity metric 3.1 includes those derived from the UK Habitat Classification system, but also EUNIS, Water Framework Directive lakes typologies and Annex 1 habitat types. Additionally, some UKHab types have been omitted from the metric because they are better recorded as the actual habitat type presented on the site (e.g. a ‘railway corridor’ is better split into its individual artificial unsealed surface, grassland*

and scrub types). If habitats have been classified using Joint Nature Conservation Committee (JNCC) Phase 1 Habitat Survey typologies, the resulting habitat types can be translated into UKHab for use in the biodiversity metric."

- 3.1.5 For the purpose of this report, the translation between Phase 1 and UKHab types followed the conversion table tool provided within the biodiversity metric 3.1. The conversion was undertaken by the Principal Ecologist / Director of Greenspace Ecological Solutions, Guy Newman BSc (Hons) MCIEEM. Once converted, the habitats were assigned a pre-set "distinctiveness" value, indicative of the inherent "value" of these habitats. The area (meters) of each habitat and length of linear habitats (meters) within the application boundary was calculated from Phase 1 Habitat mapping using Progecad software. The Phase 1 Habitat Map is presented in Figure 1.
- 3.1.6 Habitats were subject to a 'condition assessment'. The 'condition' of the habitat is considered a measure of habitat quality and measures the 'working-order' against the optimal potential of habitat type. Assessment criteria cover broad habitat types, therefore further clarification is provided, and professional judgement used to assign condition where appropriate;
- 3.1.7 Habitats were subject to a connectivity assessment, which is a measure of the relationship (specifically biological and ecosystem flows) of a habitat to its immediate surroundings.
- 3.1.8 Habitats were subject to a strategic significance assessment based on its position within the landscape, this includes consideration of local plans to identify local priorities for targeting biodiversity.
- 3.1.9 The proposals were reviewed to identify habitats created, retained and enhanced. Proposed habitats were subject to condition, connectivity and strategic significance assessments. Where a new habitat or existing habitat has been created or enhanced, additional consideration has been given towards the time taken for habitats to establish and reach target condition (temporal multiplier) and the difficulty of habitat re-creation (difficulty multiplier). Both temporal and difficulty multipliers were taken from the DEFRA Technical Guidance and user guide.
- 3.1.10 Baseline inputs (as detailed above) were entered into the Defra Biodiversity Metric 3.1 - Auditing and accounting for biodiversity calculation tool.

4 RESULTS

4.1 Headline results

4.1.1 Headline results from the Biodiversity Metric 3.1 calculator are presented in **Table 1, below**.

4.1.2 As depicted, the proposals will result in a **net gain of 3.06 (11.23%) habitat units and a net gain of 7.31 (165.85%) hedgerow units'** post-development, which is in-line with the "net gain" requirement of the NPPF 2021. Full results of the calculation are presented in Appendix A.

Table 1 – Headline Biodiversity Metric 3.1 results (habitats)

Results category	Unit type	Unit number
On-site (baseline)	Habitat	27.27
On-site (baseline)	Hedgerow	4.41
On-site (baseline)	River (Ditch)	1.23
On-site (post-intervention)	Habitat	30.33
On-site (post-intervention)	Hedgerow	11.71
On-site (post-intervention)	River (Ditch)	1.23
Total net unit change	Habitat	3.06
Total net unit change	Hedgerow	11.23
Total net unit change	River (Ditch)	0.00
Total net % change	Habitat	+11.23%
Total net % change	Hedgerow	+165.85%
Total net % change	River (Ditch)	0.00%

4.2 Detailed results

Baseline habitats (on-site)

4.2.1 Baseline habitats present on-site are presented in **Table 2, below** and depicted in the Baseline Habitats Plan (**Figure 1**).

Table 2 –Total baseline habitat areas, values and unit changes through proposed loss/enhancement (on-Site)

Broad habitat	Habitat type	Area (ha)	Unit value	Retain/enhance?	Units Lost
Heathland and Scrub	Mixed Scrub	0.15	1.32	No	-1.32
Grassland	Modified grassland	6.15	23.70	No	-23.70
Urban	Introduced shrub	0.03	0.06	No	-0.6
	Vacant/derelict land/bare ground	0.07	0.14	No	-0.14

	Vegetated garden	0.1	0.20	No	-0.20
	Developed land; sealed surface	0.39	0.00	No	0.00
	Artificial unvegetated, unsealed surface	0.02	0.00	No	0.00
	Urban Tree	0.21	1.85	0.2	-0.09

Baseline hedgerows (on-site)

4.2.2 Baseline hedgerows on-site are presented in **Table 3** and depicted in the Baseline Habitats Plan (**Figure 1**).

Table 3 –Total baseline hedgerow lengths, values and unit changes through proposed loss/enhancement

Hedgerow reference	Hedgerow type	Length (km)	Unit value	Retained Length (km)	Enhanced Length (km)	Units Lost
H1	Native hedgerow with trees – Associated with bank or ditch	0.33	4.36	0.33	0.00	0.00
H2	Hedge Ornamental Non native	0.02	0.02	0.00	0.00	-0.02
H3	Hedge Ornamental Non native	0.01	0.01	0.00	0.00	-0.01
H4	Hedge Ornamental Non native	0.02	0.02	0.02	0.00	0.00

Baseline River (on-site)

4.2.3 Baseline rivers on-site are presented in **Table 4** and depicted in the **Baseline Habitats Plan** (**Figure 1**).

Table 4 –Total baseline river lengths, values and unit changes through proposed loss/enhancement

Broad habitat	Habitat type	Length (km)	Unit value	Retained Length (km)	Enhanced Length (km)	Units Lost
River	Ditch	0.30	1.23	0.30	0.00	0.00

Created habitats (on-site)

4.2.4 Habitats to be created on-site and their respective biodiversity unit values are presented in **Table 5** and depicted in the **Proposed Habitats Plan** (**Figure 2**).

Table 5 – Created habitat values (on-site)

Broad habitat	Habitat type	Area (ha)	Units delivered
Urban	Bioswale	0.21	0.60
	Biodiverse green roof	0.25	1.12
	Developed land; sealed surface	3.39	0.00
	Introduced shrub	0.49	1.04
	Vegetated Garden	1.2	2.55
	Urban tree	3.94	13.25
Lakes	Ponds (Non-Priority Habitat)	0.07	0.55
Wetland	Reedbeds	0.09	0.62
Grassland	Modified Grassland	0.34	1.30
Heathland and Shrub	Mixed Scrub	0.88	7.54

Created hedgerows (on-site)

- 4.2.5 A total of 1.99km of native species rich hedgerow will be delivered within the landscape plan forming 11 individual hedgerows throughout the Site. Details of the hedgerow types are presented in **Table 6**.

Table 6 – Created hedgerow values (on-site)

Hedgerow type	Length (km)	Units delivered
Native species rich hedgerow	1.99	7.33

5 DISCUSSION AND CONCLUSIONS

5.1 Broad habitat type: Grassland (On-site Baseline)

Modified grassland

- 5.1.1 Spanning c. 6.15ha, the 'modified grassland' within the site is assessed as being of 'low' distinctiveness. Representative of the historic sports pitch it once was, in line with the Biodiversity Metric 3.1 Technical Supplement (Panks *et al.* 2022), 5.7ha of the modified grassland is classified as being of 'moderate' condition. The remaining 0.45ha is considered to be of poor condition. All existing grassland is to be lost through the proposed development.

5.2 Broad habitat type: Grassland (On-site Creation)

Modified grassland

- 5.2.1 0.34ha of modified grassland will be created within the Site as defined by Panks *et al.* (2021), this grassland will be of low distinctiveness and moderate condition given that it provides valuable habitat for a variety of fauna. The proposed modified grassland will deliver 1.30 habitat units.

5.3 Broad habitat type: Urban (On-site Baseline)

Introduced shrub

- 5.3.1 Spanning c.0.03ha, the introduced shrub of 'low' distinctiveness has been classed as having low biodiversity value and delivers 0.06 habitat units in 'poor' condition, in accordance with the Biodiversity Metric 3.1 Technical Supplement (Alvarez *et al.* 2021). All existing introduced shrub will be lost as a result of the proposed development.

Vacant/derelict land/bareground

- 5.3.2 Bareground spanning c.0.07ha of 'low' distinctiveness has been classed as being of 'poor' condition and delivers 0.14 habitat units in accordance with the Biodiversity Metric 3.1 Technical Supplement (Alvarez *et al.* 2021). All existing vacant/derelict land/bare ground will be lost as a result of the proposed development.

Vegetated garden

- 5.3.3 The vegetated garden spans c. 0.1ha. In accordance with the Biodiversity Metric 3.1 Technical Supplement (Panks *et al.* 2022), this 'low' distinctiveness habitat has been classed as having low biodiversity value and delivers 0.20 habitat units in accordance with the Biodiversity Metric 3.1 Technical Supplement (Alvarez *et al.* 2021). All existing vegetated garden will be lost as a result of the proposed development.

Developed land; sealed surface

- 5.3.4 Hardstanding spanning c.0.39ha of 'very low' distinctiveness has no biodiversity value and delivers no habitat units in accordance with the Biodiversity Metric 3.1 Technical Supplement (Alvarez *et al.* 2021) All existing Developed land; sealed surface is to be lost through the proposed development.

Urban trees

- 5.3.5 Based on the existing number of trees of various sizes, urban trees span c. 0.21ha of 'medium' distinctiveness habitat, which has been classed as being of 'moderate' condition, in accordance with the Biodiversity Metric 3.1 Technical Supplement (Panks *et al.* 2022) and delivers 1.85 habitat units. A single tree will be lost as a result of the proposed development, resulting in 0.01ha of the habitat lost.

5.4 Broad habitat type: Urban (On-site Creation)*Bioswale*

- 5.4.1 Post-development, a series of bioswales will be created across the site. Providing 0.21ha of habitat with low distinctiveness and a target condition of moderate (as defined by Panks *et al.* (2022)) Bioswales will deliver 0.60 habitat units.

Biodiverse Green Roof

- 5.4.2 To maximise ecology across the site, a series of biodiverse green roofs have been incorporated into the design. Totalling 0.25ha, this habitat is considered to be of medium distinctiveness and able to achieve moderate condition. Green roofs will deliver 1.12 habitat units.

Developed land; sealed surface

- 5.4.3 Developed land and sealed surfaces will become the largest habitat on-site post-development with the construction of the buildings, associated driveways, patios and pavement, comprising 3.39ha. This habitat is considered of Low Distinctiveness, has no biodiversity value, and delivers no habitat units.

Introduced Shrub

- 5.4.4 Totalling 0.49ha, the introduced shrub proposed within the site is considered of low distinctiveness. Introduced shrub provides 1.04 habitat units.

Vegetated Gardens

- 5.4.5 1.2ha of vegetated garden will be created on-site post-development. Of 'low' distinctiveness and not qualifying for a condition assessment, as defined by Panks *et al.* (2022) this habitat will deliver 2.55 habitat units.

Urban trees

- 5.4.6 Based on the proposed planting of 14 'large', 40 Medium and 346 small trees, in accordance with Biodiversity Metric 3.1 Technical Supplement (Panks et al., 2022), the area of urban street trees post-development will be c. 3.94ha, delivering 13.25 habitat units.

5.5 Broad habitat type: Heathland and Shrub (On-site Baseline)*Mixed Scrub*

- 5.5.1 Spanning c. 0.15ha, the 'mixed scrub' within the site is assessed as being of 'medium' distinctiveness and as being of 'moderate' condition, in accordance with the Biodiversity Metric 3.1 Technical Supplement (Alvarez et al. 2021). All existing Mixed scrub is to be lost through the proposed development.

5.6 Broad habitat type: Heathland and Shrub (On-site Creation)*Mixed Scrub*

- 5.6.1 To form visual screening from the road edge, the boundaries of the trim trail, and to be scattered strategically throughout the site, mixed Scrub is to total 0.88ha in area. Defined by Panks et al. (2022) to be of medium distinctiveness, the scrub is likely to achieve fairly good condition and will provide 7.54 habitat units.

5.7 Broad habitat type: Lakes (On-site Creation)*Ponds (Non-Priority Habitat)*

- 5.7.1 Through the provision of a wildlife friendly attenuation scheme ponds totalling 0.07ha are to be created within the site. Considered of medium distinctiveness and likely to achieve moderate condition, ponds will provide 0.55 habitat units.

5.8 Broad habitat type: Wetland (On-site Creation)*Reedbeds*

- 5.8.1 Totalling 0.09ha, reedbeds proposed within the site are considered of High Distinctiveness and likely to achieve moderate condition. Reedbeds will deliver 0.62 habitat units.

5.9 Broad habitat type: Grassland (On-site Creation)*Modified Grassland*

- 5.9.1 Forming the formal grassland habitats within the site, modified grassland will extend to 0.34 ha and is considered to be of low distinctiveness. Through appropriate management, the modified grassland is expected to reach moderate condition and to deliver 1.30 habitat units.

5.10 Linear feature type: Hedgerows (On-site Baseline)*Native hedgerows (on-site retained)*

- 5.10.1 H1 and H2, measuring 0.33km and 0.02km respectively, are native hedgerows that currently exist within the site. Providing 4.36 habitat units, H1 is to be retained and no value will be lost. H2 will be removed, and 0.02 habitats units will be lost.

Hedge ornamental non-native (on-site retained)

- 5.10.2 H3 and H4 are ornamental non-native hedgerows of 0.01km and 0.02km in length respectively. Providing 0.02 habitat units, H4 is to be retained and no value will be lost. H3 will be removed, and 0.01 habitats units will be lost.

5.11 Linear feature type: Hedgerows (On-site Creation)*Species-rich native hedgerows (on-site creation)*

- 5.11.1 To facilitate gains in biodiversity value, 11 new species rich native hedgerows will be planted and subjected to a degree of management that ensures the hedgerows are maintained in 'Moderate' condition. Providing a cumulative length of 1.99km of new hedging the new hedgerows will result in a combined 7.33 habitat units being delivered post-development.

5.12 Linear feature type: Rivers (On-site Baseline)*Ditches (on-site retained)*

- 5.12.1 A single ditch, measuring 0.30km currently exists within the site. of 'Medium' distinctiveness habitat, which has been classed as being of 'Poor' condition, in accordance with the Biodiversity Metric 3.1 Technical Supplement (Panks *et al.* 2022) and delivers 1.23 habitat units, this ditch is to be retained and no value will be lost.

5.13 Total net gain*Habitats*

- 5.13.1 Should the above strategy for biodiversity net gain be adhered to, habitat units are set to rise by **3.06 units (11.23%)**.

Hedgerows

- 5.13.2 Should the above strategy for biodiversity net gain be adhered to, hedgerows unit are set to rise by **7.31 (165.85%)**.

6 SUMMARY

- 6.1 Greenspace Ecological Solutions were commissioned by Danescroft (FREOF V Willingdon) LLP to determine the potential of the development proposals for land at Hindsland Playing Fields to demonstrate Biodiversity Net Gain.
- 6.2 Existing and proposed habitat types were assessed using the Natural England Biodiversity Metric 3.1. Through the use of a diverse mosaic of native and ornamental planting, the proposed landscape plan (**Figure 2**), will result in a biodiversity net gain within the Site of **3.06 (+11.23%) habitat units and 7.31 (165.85%) hedgerow units** above that which currently exist.
- 6.3 The biodiversity net gains achievable within the proposed development are therefore in line with the requirements of the NPPF 2021 and Wealden DC's local planning policy; both of which seek the provision of Biodiversity Net Gain in all planning applications. Consequently, regarding Biodiversity Net Gain, there is no known reason why planning permission should not be granted in this instance.

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Figures

Appendices