



Land at Bird in Eye Farm,
South of Bird in Eye Hill, Uckfield

Biodiversity Net Gain Assessment

Prepared by
CSA Environmental

Croudace Homes Limited and
Mr and Mrs Berry

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This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

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Appendix B – Illustrative Site Layout (Ref: PRB/BIE/PA2N)

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1.0 INTRODUCTION

- 1.1 This report has been prepared by CSA Environmental on behalf of Croudace Homes Limited and Mr and Mrs Berry. It sets out the findings of a Biodiversity Net Gain Assessment of proposed development at Land at Bird in Eye Farm, South of Bird in Eye Hill, Uckfield (hereafter 'the Site'). Residential development for up to 290 residential units, associated landscaping, informal open space and strategic Suitable Alternative Natural Greenspace (SANG), with access from the B2102 is proposed at the Site, for which outline planning permission will be sought. Details of appearance, landscaping, layout and scale are reserved.
- 1.2 The development Site occupies an area of c. 14.7ha and consists of a series of improved grassland fields, hedgerows, trees and a strip of ancient woodland along the western boundary with further adjacent woodland adjacent to the south (see Habitats Plan in Appendix A). The proposed strategic SANG occupies an area of 26.17ha and consists of agriculturally improved grassland fields, trees, plantation woodland and access through ancient woodland.
- 1.3 The Site is located around central grid reference TQ 4832 1206, to the east of Uckfield. The landscape context of the Site is dominated by grassland and arable fields to the north, south and east, with scattered parcels of semi-natural and ancient woodland connected by a network of field boundary hedgerows. The town of Uckfield intersected by treelines and woodland blocks extends to the west of the Site.
- 1.4 This Assessment has been informed by a desk study, extended Phase 1 Habitat survey undertaken in April 2019 and habitat condition assessment undertaken in April 2020. A range of protected species surveys were also undertaken at the Site during this period including surveys for bats, dormice, badger, great crested newt and reptiles; the results of which have been considered when determining the functional value of the existing habitats and the design of the proposed development. Full results of this survey work are presented within the Ecological Impact Assessment (EclA) (ref: CSA/2646/11/C) which should be read in conjunction with this report.
- 1.5 Calculation of biodiversity net gain units has been undertaken using the Natural England Biodiversity Metric 2.0 (Beta Version; December 2019); and follows guidance set out within the Biodiversity Net Gain: Good practice principles for development (Baker *et al.*, 2019).
- 1.6 This BNG Assessment aims to:

- Provide baseline data to classify the type, distinctiveness, condition, connectivity and strategic significance of habitats present prior to and post- development.
- Ensure that baseline habitat conditions are classified in a robust and consistent manner, and that classification is based on the best data available data at the time of assessment.
- Clearly identify data collection methods and any limitations.
- Calculate baseline pre- and post-development habitat units and hedgerows units for the Site based on current development proposals.
- Propose a Biodiversity Net Gain design with the aim of maximising biodiversity net gain through habitat creation, enhancement and succession.
- Aim to achieve BNG on-Site wherever possible; with off-site measures being considered as an alternative option if required.

2.0 PLANNING POLICY AND LEGISLATION

- 2.1 The National Planning Policy Framework (NPPF3) (Ministry of Housing, Communities and Local Government, 2019) sets out requirements for the delivery of biodiversity net gain, and this is supported within Planning Policy Guidance (PPG) (updated July 2019). The Natural Environment PPG addresses principles across a broad spectrum of topics targeting biodiversity conservation, from individual site and species protection through to the supporting of ecosystem services, and the use of local ecological networks to support the national Nature Recovery Network. In particular the PPG promotes the delivery of **measurable Biodiversity Net Gain through the creation and enhancement of habitats alongside development**.
- 2.2 The Government has confirmed its intention to mandate Biodiversity Net Gain at a minimum of 10%. It is envisaged that this will be enacted into UK law through adoption of the Environment Bill. Whilst the Bill is still to receive Royal Assent (anticipated autumn 2021 at present), and once this has been achieved a two-year implementation period is expected, many Local Planning Authorities have started to include biodiversity net gain requirements into Local Plan policy.
- 2.3 The following policies from the Wealden District Adopted Core Strategy Local Plan (2013) make reference to biodiversity and the protection and enhancement of priority habitats and species:
- Policy WCS12: Biodiversity, and in particular to ensure habitats, biodiversity features and ecological networks are **maintained, restored, enhanced and where possible created to achieve a net gain in biodiversity** and sustain wildlife
 - Policy WCS13: Green Infrastructure, ensuring a multifunctional, accessible network which **maintains and improves biodiversity** and landscape character.

3.0 BIODIVERSITY NET GAIN: GOOD PRACTICE PRINCIPLES

Biodiversity Net Gain

- 3.1 Biodiversity net gain has been defined as 'development that leaves biodiversity in a better state than before, and an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation' (Baker, 2016).

Good Practice Principles

- 3.2 Good practice principles for biodiversity net gain are set out within Table 1.1 of Biodiversity Net Gain: Good practice principles for development (Baker *et al.*, 2019). Key principles include:

- Apply the 'Mitigation Hierarchy' (in line with CIEEM Guidelines for Ecological Impact Assessment (EcIA) (CIEEM, 2018) and be 'additional' by achieving outcomes that exceed existing obligations.
- Avoid losing biodiversity which cannot be off-set elsewhere (e.g. irreplaceable habitats).
- Address risk (e.g. difficulty of achieving habitat creation / enhancement for net gain).
- Make a 'measurable' net gain contribution (e.g. calculated using an appropriate metric) and ensure that calculations consistent and transparent (i.e. limitations and assumptions are clearly identified).
- Ensure that net gain design achieves the best outcome for biodiversity (this may require both quantitative and qualitative assessment) and create a net gain legacy for long-term benefits.

4.0 METHODS

Desk Study

- 4.1 In order to inform an assessment of the habitat types, condition and strategic significance a desk study was undertaken. This comprised a review of the following:
- Wealden District Adopted Core Strategy Local Plan (2013) - to identify Biodiversity Opportunity Areas (BOAs).
 - Multi-Agency Geographic Information for the Countryside (MAGIC) online database (accessed March 2021) - to identify statutory nature conservation designations and Network Enhancement Zones.
 - Data search response from Surrey Biological Records Centre (April 2019) - to identify non-statutory nature conservation designations.
- 4.2 Relevant desk study data are presented in the accompanying EclA (CSA/2646/11).

Extended Phase 1 Habitat Survey

- 4.3 An extended Phase 1 Habitat Survey of the Site was undertaken Tilly Fitzwebster ACIEEM accompanied by Aaron White GradCIEEM on 12 April 2019, followed by a Habitat Condition Assessment undertaken by Tilly Fitzwebster ACIEEM on 28 April 2020. Both surveys were undertaken in fine and dry weather conditions, during a time of year suitable for botanical survey and encompassed the Site and immediately adjacent habitats that could be viewed. Habitat type and condition was recorded and mapped; see Habitats Plan (CSA/2646/108) provided in Appendix A. Botanical species lists for each habitat identified are provided within the EclA (CSA/2646/11).
- 4.4 The Biodiversity Metric 2.0 works best where habitat types are classified using UK Habitats Classification methodology (UKHAB Working Group, 2018). As such, tab G9 'Translation Phase 1' of the Metric, alongside professional knowledge of habitat assessment, was used to translate Phase 1 habitats into UKHAB codes provided within the Metric. This informed the calculation of baseline biodiversity units.

Condition Assessment

- 4.5 Habitat condition was assigned following guidance from the 'Technical Supplement' document (Natural England, 2019) which accompanies the Biodiversity Metric 2.0. Assessment criteria were

followed for each broad habitat type, to determine the condition of each habitat present.

- 4.6 A summary of the condition criteria used to assess habitat condition for key grassland habitats and linear hedgerow habitats is given in Tables 1 – 5 below.

Table 1. Habitat Condition Assessment Method: Grassland

Condition	Assessment Criteria
Good	<ul style="list-style-type: none"> Species-rich grassland of all Priority Habitat Types. Of high to moderate quality Wildflower and sedges above 30% excluding white clover <i>Trifolium repens</i>, creeping buttercup <i>Ranunculus repens</i> and injurious weeds Meets all the condition criteria with only minor variation None of the indicators of poor condition are present (4, 5 & 6)
Moderate	<ul style="list-style-type: none"> Semi-improved grassland occurs on a wide range of soils and may be derived from higher quality Priority Habitat grassland habitats in poor condition. Often as they deteriorate following nutrient inputs. Typical grasses include: cock's-foot, common bent, creeping bent, crested dog's-tail, false oat-grass, meadow fescue, meadow foxtail, red fescue, sweet vernal grass, Timothy, tufted hair-grass and Yorkshire fog Total cover of wildflowers and sedges less than 30%, excluding white clover, creeping buttercup and injurious weeds Rye-grass cover is less than 25% including amenity grasslands OR clearly fails at least 1 of the condition criteria OR the grassland type has some differences between what is described in the relevant habitat classification and what is visible on site. It is a Lower Quality Priority Habitat, but clearly recognisable as such Potentially restorable to grassland Priority Habitat with improved management Cover of undesirable species at 5-15%
Poor	<ul style="list-style-type: none"> Agricultural grasslands is characterised by vegetation dominated by a few fast-growing grasses on fertile, neutral soils. It is frequently characterised by an abundance of rye-grass <i>Lolium</i> spp. (above 25% cover) and white clover <i>Trifolium repens</i>. These grasslands are typically either managed as pasture or mown regularly for silage production or in non-agricultural contexts for recreation and amenity purposes; they are often periodically re-sown and are maintained by fertiliser treatment and weed control. They may also be temporary and are sown as part of the rotation of arable crops but they are only included in this broad habitat type if they are more than one year old Amenity and road verge grasslands with similar species to description for agricultural grasslands OR most of the condition criteria are being failed Cover of undesirable species above 15%, usually resulting in a dense scrub or tree cover, or high cover of exotic species
Undesirable Species: <ul style="list-style-type: none"> Creeping thistle <i>Cirsium arvense</i>, spear thistle <i>Cirsium vulgare</i>, curled dock <i>Rumex crispus</i>, broad-leaved dock <i>Rumex obtusifolius</i>, common ragwort <i>Senecio jacobaea</i>, common nettle <i>Urtica dioica</i>, creeping buttercup <i>Ranunculus repens</i>, white clover <i>Trifolium repens</i>, cow parsley <i>Anthriscus sylvestris</i>, marsh thistle <i>Cirsium palustre</i> and marsh ragwort <i>Senecio aquaticus</i>. 	

Table 2. Habitat Condition Assessment Method: Hedgerows

Hedgerow Favourable Condition Attributes		
Attributes and functional groupings	Criteria (minimum requirements for 'favourable condition')	Description
A1. Height	>1.5m average along length	Average height of woody growth estimated from base of stem to top of shoots
A2. Width	>1.5m average along length	Average width of woody growth estimated at

		widest point of the canopy
B1. Gap – hedge base	Gap between ground and base of canopy <0.5m for >90% of length (unless line of trees)	Vertical gappiness of woody component, and its stance from the ground to the lowest leafy growth
B2. Gap – hedge canopy continuity	Gaps make up <10% of total length, and No canopy gaps >5m	Horizontal gappiness of woody component. Gaps are complete breaks in the canopy (no matter how small). Access points and gates contribute to overall gappiness but not subject to 5m criterion
C1. Undisturbed ground	>1m width of undisturbed ground with perennial herbaceous vegetation for >90% of length is present on at least one site of hedge	This is the horizontal gappiness of the woody component of the hedgerow. Gaps are complete breaks in the woody canopy. Access points and gates contribute to the overall gappiness, but are not subject to the >5m criterion.
C2. Undesirable perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% of cover of the area of undisturbed ground	Indicator species used are nettles (<i>Urtica</i> spp.), cleavers (<i>Galium aparine</i>) and docks (<i>Rumex</i> spp.). Their presence should not exceed the 20% cover threshold
D1. Invasive and neophyte species	>90% of hedgerow and undisturbed ground is free of invasive non-native and neophyte species	Neophytes are plants that have naturalised in the UK since AD 1500
D2. Current Damage	>90% of hedgerow or undisturbed ground is free of damage caused by human activities	Criterion addresses damaging activities that may have led to or lead to deterioration in other attributes, and could include evidence of pollution, piles of manure or rubble, or inappropriate management practices

Table 3: Hedgerow Condition Assessment and Weighting

Condition Categories for Hedgerows		
Category	Maximum number of attributes that can fail to meet 'favourable condition' criteria	Weighting (score)
Good	No more than 2 failures in total and no more than 1 in any functional group	3
Moderate	No more than 4 failures in total and fails both attributes in a maximum of one functional group	2
Poor	Fails a total of more than 4 attributes or both attributes in more than one functional group	1

Table 4: Habitat Condition Assessment Method: Tree Lines

Condition Categories for Tree Lines		
Category	Continuity of tree canopy	Weighting (score)
Good	Mature trees (at least 1/3 expected fully mature height) with continuous canopy (gaps <10% of total length and there are no canopy gaps >5 m)	3
Moderate	Continuous canopy (trees < 1/3 expected fully mature height)	2
Poor	Broken canopy	1

Table 5: Habitat Condition Assessment Method: Scrub

Condition	Assessment Criteria for Scrub	Weighting (score)
Good	<ul style="list-style-type: none"> Meets all of the 5 criteria with only minor variation. Scrub type of high biodiversity value in good condition None of the indicators of poor condition are present. 	3
Moderate	<ul style="list-style-type: none"> The single woody species cover is greater than 75%. The age range is missing some size classes. Scrub type of high biodiversity value in poor condition. The scrub type has minor differences between what is described in the relevant habitat classifications and what is visible on site. Cover of undesirable and invasive species at 5-20%. 	2
Poor	<ul style="list-style-type: none"> The single woody species cover is greater than 75%. The age range is missing some size classes. Scrub type of high biodiversity value in poor condition. The scrub type has minor differences between what is described in the relevant habitat classifications and what is visible on site. Cover of undesirable and invasive species at 5-20%. Single-age scrub present. Potentially restorable to improved scrub habitat with improved management. All of the condition criteria are being failed. The scrub type has major differences between what is described in the relevant habitat classifications and what is visible on site. Cover of undesirable and invasive species above 20% [see below]. All <i>Rhododendron</i> stands will be in this condition. 	1
Undesirable Species: <ul style="list-style-type: none"> Creeping thistle <i>Cirsium arvense</i>, common nettle <i>Urtica dioica</i>, Himalayan balsam <i>Impatiens glandulifera</i>, Japanese knotweed <i>Fallopia japonica</i>, Cherry Laurel <i>Prunus laurocerasus</i>, <i>Rhododendron</i> <i>Rhododendron ponticum</i>. 		

Table 6: Habitat Condition Assessment Method: Woodland

Condition	Assessment Criteria for Woodland	Weighting (score)
Good	<ul style="list-style-type: none"> Meets at least 10 of the criteria with only minor variation. No more than 1 of the indicators of poor condition are present: Stands of native trees that do not obviously originate from planting should be classified as native semi-natural woodland. 	3
Moderate	<ul style="list-style-type: none"> Clearly fails at least 2 of the criteria above. OR invasive non-native plants are 5-20%. OR where non-native species comprise more than 20% of the canopy, the woodland should be recorded as either non-native plantation or mixed woodland. A mixed woodland is woodland with native and non-native species. (This includes woodlands established by planting and by natural regeneration.) Trees of similar age and height structure throughout the woodland. Little standing or fallen deadwood present. 	2

Poor	<p>The following characteristics can help to identify plantations: (note: BAP woodlands can be plantation woodlands)</p> <ul style="list-style-type: none"> • Non-native trees often of a single species or the same age are the dominant component; • OR invasive non-native plants are greater than 20%. • Mixed species show a consistent planting pattern across the site. • Original planting lines, or remains of planting lines, can be seen. • Drainage features and channel straightening of watercourses. 	1
<p>Undesirable Species:</p> <ul style="list-style-type: none"> • Himalayan balsam <i>Impatiens glandulifera</i>, Japanese knotweed <i>Fallopia japonica</i>, Cherry Laurel <i>Prunus laurocerasus</i>, Shalloon <i>Gaultheria shallon</i>, Snowberry <i>Symphoricarpos albus</i>, Variegated yellow archangel <i>Lamium galeobdolon</i> subsp. <i>Argentatum</i>, Rhododendron <i>Rhododendron ponticum</i>. 		

Calculation of Biodiversity Units

- 4.7 The Biodiversity Metric 2.0 (Beta Version, December 2019) was used to calculate the change in biodiversity units (including habitat units and hedgerow units) and the overall percentage of gain/loss achieved. Metric calculations have been undertaken Tilly Fitzwebster ACIEEM and reviewed by Clare Caudwell CEcol MCIEEM who has completed the 'Calculating and Using Biodiversity Units with Metric 2.0 CIEEM Training Course' (December, 2019).
- 4.8 Pre-development baseline and proposed habitat areas were measured as distinct habitat parcels. Habitat parcels were measured using habitat mapping and aerial imagery overlain in AutoCAD.
- 4.9 The pre-development habitat areas baseline was calculated using measurements taken from the Habitats Plan (CSA/2646/108). Hedgerows and tree lines were included as linear habitats only.
- 4.10 Post-development habitats were calculated by measuring the Illustrative Site Layout Plan prepared by Paul Brown (PRB/BIE/PA2N) and the Landscape Strategy and SANG Design Plan prepared by CSA Environmental (CSA/2646/114/L), allowing areas of retained, created and enhanced habitat to be identified.
- 4.11 Habitat condition for both retained and created habitats was assigned taking a precautionary approach and with consideration of biotic and operational phase conditions (i.e. those which may limit the extent to which 'good' condition is likely to be reached).
- 4.12 A full copy of the Biodiversity Metric 2.0 calculator should be read in conjunction with this report and is available upon request.

Ecological Connectivity

- 4.13 The current beta version of the Metric 2.0 includes connectivity as a multiplier as well as a 'Connectivity Calculator'. However, due to functionality issue with this tool and issues highlighted with regards to the use of this multiplier in general Natural England have confirmed in their response to the Net Gain Consultation (Defra, December 2018) that:

'The Ecological Connectivity calculator tool and an accompanying priority habitat reference data set was released six months into the consultation period. As a consequence, there was less time for testing during the consultation period so little feedback was received.'

Post-consultation we sought the views of users and our external "Sounding Board" and concluded that the connectivity tool was not being used. Those who have used the tool have found it unreliable to load and complicated to use. In addition, it is only able to consider the connectivity of high and very high distinctness habitats. Accordingly, we have taken the decision to fix connectivity at Low (x1 multiplier) for all habitats until the metric is next reviewed.'

- 4.14 It is understood that the connectivity multiplier will be removed from the new version of the Metric (3.0), anticipated to be published in 'spring 2021'. As such, in line with current guidance, all ecological connectivity has been assumed to be low, with a multiplier value of 1.

Strategic Significance

- 4.15 This criteria within the Biodiversity Metric 2.0 was assessed by determining if habitat areas within the Site occur within any strategic locations for biodiversity, form part of a designated site for nature conservation or are identified within local plans such as Biodiversity Opportunity Areas (Surrey Nature Partnership) and Ecological Networks (MAGIC).

Trading Summary

- 4.16 'Trading Up' is a concept which requires 'conserving through offset components of biodiversity that are of a higher conservation priority (for example because they are more irreplaceable and vulnerable) than those affected by the development project for which the offset is envisaged' (BBOP, 2018). For example, should non-irreplaceable habitats be lost / impacted as a result of proposed development, offsets should be achieved through the creation / enhancement of habitat of the same or higher distinctiveness, where environmental conditions are appropriate and where it generates the greatest benefits for biodiversity. Trading has been considered during the design stage.

Assumptions & Limitations

- 4.17 It should be noted that the accuracy of habitat area measurement is limited by the form of baseline data collection and resolution of development proposal plans. In this instance baseline habitat areas have been calculated by cross referencing illustrative Habitats Plans with aerial imagery. Post-development habitat areas have been measured from the Illustrative Site Layout Plan (PRB/BIE/PA2N) and the Landscape Strategy and SANG Design Plan (CSA/2646/114/L). In the absence of detailed planting plans, reasonable assumptions have been made with regards to the type and condition of habitats that could be created.
- 4.18 For the post-development scenario, the developable area has been categorised using a ratio of buildings/hardstanding and greenspace based upon a typical Croudace Homes residential development, as well as approximate calculations from the architect: 60% 'Urban - Developed land; sealed surface' and 40% "Urban - Vegetated garden". Street trees were counted from the Sketch Layout, and assigned either medium or large size, according to the landscape plans, anticipated species and their expected size at target condition.
- 4.19 Grassland within the areas of formal POS that are shown as "amenity grassland" on the Landscape Strategy and SANG Design Plan have been assigned as "amenity grassland" in poor condition where created, or "modified grassland" in moderate condition, based on the assumption that these areas will be enhanced from the existing "modified grassland" in poor condition, but will still be kept short enough for amenity use. Areas of thicket planting and shrubs have been measured as "mixed scrub" in moderate condition. Areas of wildflower grassland creation have been assigned the category "other neutral grassland" in good condition, as due to the size and location of these areas it is considered this will be achievable through appropriate management.
- 4.20 Grassland within the SANG area shown as "longer grassland" on the the Landscape Strategy and SANG Design Plan have been assigned "modified grassland" in moderate condition, as have the areas shown as "natural succession", based on the assumption that these areas will be enhanced from the existing "modified grassland" in poor condition, through the removal of the heavy grazing regime and management as meadow through infrequent cuts. Proposed management of the habitats within the SANG area are detailed within the SANG Design and Framework Management Plan (CSA/2646/05).
- 4.21 Areas of new woodland planting have been assigned "other woodland; broadleaved" in moderate condition as it is considered that this is achievable through appropriate management of these areas. Additionally, the new wildlife pond has been assigned as "ponds

(non-priority habitats)" in moderate condition as this is considered achievable through the planting of marginal and aquatic planting as well as appropriate management.

- 4.22 As ancient woodland is an irreplaceable habitat it cannot be included within the biodiversity net gain calculations. As such, this area has been discounted from the metric. Any anticipated impacts and effects on ancient woodland are addressed within the EcIA.

5.0 RESULTS

Existing Habitats Condition Assessment

Grassland

Habitat Description

- 5.1 The Site is largely dominated by fields and paddocks of improved grassland, grazed by horses and ponies. Dominant species include perennial rye-grass *Lolium perenne*, meadow foxtail *Alopecurus pratensis*, white clover *Trifolium repens*, creeping buttercup *Ranunculus repens* and broadleaved dock *Rumex obtusifolius*. Other occasional species included creeping thistle *Cirsium arvense*, meadow crane's-bill *Geranium pratense*, common field speedwell *Veronica persica*, ground ivy *Glechoma hederecea* and yarrow *Achillea millefolium*.
- 5.2 This grassland is considered to be 'improved' (Phase 1 Habitats Survey classification), equating to 'modified grassland' (UK Habs classification).

Habitat Condition

- 5.3 The modified grassland is considered to be a typical example of this habitat type as it has a low level of diversity of wildflower, sedge and grassland species. The undesirable species cover is more than 5%, and it has a relatively patchy sward in places (bare ground cover is occasionally more than 10%). According to these criteria, this modified grassland is of 'poor' condition.

Woodland

Habitat Description

- 5.4 A block of ancient woodland is present along the western boundary of the Site (W1). The woodland is dominated by hazel *Corylus avellana* and elder *Sambucus nigra*, with hawthorn *Crataegus monogyna*, willow *Salix* sp. honeysuckle and bramble also present. The ground flora includes extensive carpets of bluebell, yellow archangel *Lamium galeobdolon* and wild garlic *Allium ursinum*, with frequently occurring dog's mercury *Mercurialis perennis*, lords and ladies *Arum maculatum*, cleavers *Galium aparine*, harts-tongue fern *Asplenium scolopendrium* and ground ivy.
- 5.5 Ancient woodland is an irreplaceable habitat and as such it cannot be included within the biodiversity net gain metric. However, this habitat is discussed further under the 'Biodiversity Unit Calculations' section below.

- 5.6 A small block of semi-natural broadleaved woodland is present to the north of woodland W1, adjacent to Framfield Stream. The species assemblage of this woodland is similar to that of W1; however the ground flora is much sparser, with limited species diversity.
- 5.7 Given the species composition this woodland is considered to be 'semi-natural broadleaved woodland' (Phase 1 Habitats Survey classification), equating to 'other woodland; broadleaved' (UK Habs classification).
- 5.8 Two blocks of plantation broadleaved woodland are present within the proposed SANG (W3 and W4 on the Habitats Plan in Appendix A). Species present include hazel, silver birch *Betula pendula*, hawthorn and blackthorn. Evidence of bark stripping by deer was noted throughout these woodlands. It is understood that both woodlands were planted under the 'Millennium Woods' scheme, and as such comprise stands of even aged semi-mature trees.
- 5.9 These woodlands are considered to be 'broadleaved plantation woodland' (Phase 1 Habitats Survey classification), equating to 'other woodland; broadleaved' (UK Habs classification).

Habitat Condition

- 5.10 Woodland W2 contains extensive ground flora, good age and structural diversity, and frequent standing and fallen deadwood. Additionally, there are no noticeable areas of invasive or non-native species. As such, it is considered to be in 'good' condition.
- 5.11 The small block of broadleaved woodland adjacent to F5 and F7 is considered to be a 'good' example of broadleaved woodland, with extensive ground flora, good age and structural diversity, and occasional standing and fallen deadwood. Additionally, there are no noticeable areas of invasive or non-native species. As such, it is considered to be in 'good' condition.
- 5.12 The two blocks of plantation woodland (W3 and W4) contain very sparse ground flora, fairly limited age and structural diversity with only minor evidence of regeneration. There is no standing deadwood but some minor evidence of fallen deadwood. As such, these woodlands are considered to be in 'moderate' condition.

Hedgerows and Tree Lines

Habitat Description

- 5.13 There are five hedgerows present within the proposed development area at the Site. Three of these are species-poor; H1 is a blackthorn *Prunus spinosa* dominated hedgerow along the eastern end of the northern boundary, H4 is a hawthorn *Crataegus monogyna* hedgerow

with some areas of new infill planting; and H5 is a hawthorn dominated hedgerow within the north eastern extent of the site.

- 5.14 H2 is a species-rich hedgerow with trees including elm *Ulmus* sp., hazel *Corylus avellana*, holly *Ilex aquifolium*, honeysuckle *Lonicera periclymenum*, dog-rose *Rosa canina*, Oak *Quercus* sp., bramble *Rubus fruticosus* agg. and hawthorn. A remnant defunct hedgerow (H3) was also present running south-north along the northern extent of the site, which is dominated by hazel.
- 5.15 Under UK Habs classification hedgerows H1, H3, H4, H5 and H7 are 'Native hedgerows', whilst H2 is a 'Native hedgerow with trees', and H6 is a 'line of trees (ecologically valuable)' due to the supporting function it provides for roosting barn owl and other wildlife (detailed provided within EclA).

Habitat Condition

- 5.16 Hedgerows H1, H2, H4, H5 and H6 were all considered to be in 'Good' condition with all of them being at least 1.5m wide and high, with at least 90% native species and free from damage from inappropriate manage. Hedgerow H3 was considered to be in 'moderate' condition due gaps in the hedgerow accounting for more than 10% of the total hedgerow length. The line of trees is considered to be in 'Moderate' condition, due to the percentage of 'undesirable' species present.

Scrub

Habitat Description

- 5.17 Occasional patches of dense scrub have developed around the edges of woodland at the Site. Species bramble, bracken *Pteridium aquilinum* and common nettle along with hazel, elder and holly saplings.
- 5.18 These patches of scrub have been classified as 'heathland and shrub-mixed scrub' under the UK Habs classification.

Habitat Condition

- 5.19 All areas of scrub are considered to be in 'Poor' condition due to the lack of defined edge, limited age range and diversity of species.

Post-Intervention Habitat Creation and Enhancement

- 5.20 Post-intervention habitat creation and enhancement which could be delivered alongside development (as illustrated on the Illustrative Site Layout Plan) includes the following:
- Retention of the majority of existing tree lines and hedgerows, with the exception of the removal of hedgerow H3 and small sections

from H2 (c. 0.02km), H4 (c. 0.04km) and H6 (c. 0.06km) to facilitate new pedestrian and vehicular access.

- Enhancement to the line of trees within the SANG is proposed, however no enhancement of retained hedgerows is proposed as the majority are already considered to be in good condition.
- Enhancement of 9.05ha of modified grassland within the SANG from poor condition to a target condition of moderate (shown as “longer grassland” on the Landscape Strategy and SANG Design Plan).
- Enhancement of a further 5.8ha of modified grassland within the SANG, currently in poor condition, enhanced to moderate condition (shown as “natural succession” on the Landscape Strategy and SANG Design Plan).
- Enhancement of 5.31ha of plantation woodland within SANG ('other woodland; broadleaved'); target condition of good.
- Enhancement of 1.96ha of modified grassland within development area; target condition of moderate.
- Creation of 3.26ha of 'developed land; sealed surface' (houses)
- Creation of 2.17ha of 'vegetated gardens' with a target condition of poor.
- Creation of 0.72ha of other neutral grassland (wildflower meadow) within areas of Public Open Space in the development area; target condition of good.
- Creation of 4.89ha of other neutral grassland (wildflower meadow) within SANG; target condition of good.
- Creation of 0.58ha of 'other woodland; mixed' within the development area; target condition of moderate within the development area.
- Creation of 0.32ha of a large attenuation basin ('other neutral grassland') in moderate condition within the development area.
- Creation of 0.28ha of wet and dry grassland within the swales ('other neutral grassland') in moderate condition.
- Creation of 0.12ha of thicket planting ('mixed scrub') in moderate condition within the development area.
- Creation of 1.48ha of 'amenity grassland' in poor condition within the development area.
- Creation of 0.06ha of marginal planting around the SUDs and swales ('other neutral grassland') in moderate condition, within the development area.
- Creation of 1.06ha of 'other woodland; broadleaved' within the SANG area, with a target condition of good.
- Creation of 0.04ha of 'ponds (non-priority habitat)' within the SANG, with a target condition of moderate.
- Creation of 1.81ha of 'street trees' within the development area with a target condition of moderate.
- Creation of 1.73ha of 'street trees' within the SANG area with a target condition of moderate.

- Creation of 3.01ha of roads and pathways within the development area, including the SANG car park ('developed land; sealed surface')

5.21 It should be noted that habitat creation and enhancement measures provided within the proposed SANG are not considered necessary to achieve the primary SANG objective of providing a suitable semi-natural amenity area for new residents to use for informal recreation (primarily dog walking); due to the existing rural and semi-natural status of the existing baseline habitats. Therefore the habitat creation and enhancement measures proposed above are considered to be 'additional' and can contribute towards biodiversity net gain for the Site. This habitat creation and enhancement provision will be secured for a minimum of 30 years in line with requirements for Biodiversity Net Gain.

Biodiversity Unit Calculations

- 5.22 Biodiversity Metric calculations have been based on the above assumptions in terms of habitat creation and enhancement.
- 5.23 A summary of changes in habitat areas / hedgerow length is provided in Table 7.

Table 7. Quantitative Assessment of Biodiversity Impact

Factor	Habitats (ha)	Hedgerows (km)
Total on-site area / length (baseline)	40.53	3.55
Total site units (baseline)	129.49	27.55
Area / length retained	0.38	2.00
Units retained	1.93	13.80
Area / length enhanced	22.12	1.38
Baseline units enhanced	87.52	12.70
Area / length lost	18.03	0.17
Units lost	40.04	1.06
Post-intervention* units on-site	195.26	28.67
Net project biodiversity units	65.77	1.11
Total project biodiversity % change	50.79%	4.05%

**Post-intervention – including habitat retention, creation and enhancement*

- 5.24 The scheme will not result in the loss of any 'high' or 'very high' distinctiveness habitats. However, there will also be some minor loss of ancient woodland (0.01ha) to facilitate a new drainage outfall which will extend from the attenuation basin in the south-western corner of the Site, towards Framfield Stream. Ancient woodland is an irreplaceable habitat and so this cannot be included within the metric;

but impacts and effects to this habitat are assessed within the accompanying EclA.

- 5.25 Losses of 'medium' distinctiveness habitats will be limited to 0.09ha of mixed scrub (1% of all medium distinctiveness habitat present on site). There will be a loss of 17.23ha of 'low' distinctiveness habitat (modified grassland).
- 5.26 However, given the proposed enhancement and creation of habitats including mixed scrub, woodland, ponds and wildflower grassland ("other neutral grassland"), the proposed development will result in an overall net gain of biodiversity onsite. No trading down of habitats will result from the proposals.
- 5.27 The achievable net gain has been identified as c. 65.77 habitat units, equating to an overall net gain of 50.79% habitat units. Additionally, it has been calculated that there will be an overall net gain of c. 1.11 hedgerow units, equating to a total net gain of 4.05% hedgerow units. There is also suitable scope for increasing the provision of new hedgerow planting within detailed landscape plans at the Reserved Matters stage, with the aim of reaching a +10% net gain in hedgerow units.

Ecological Functionality

- 5.28 A qualitative assessment of Biodiversity Net Gain should also be assessed to ensure that the scheme design delivers the best and most appropriate habitat measures which maintain and enhance ecological functionality of a site and deliver benefits for local biodiversity.
- 5.29 The proposed scheme was designed in liaison with the design team to retain and protect key corridors where possible and create new areas of open space, whilst maintaining viability. The scheme design has been informed by a full suite of habitat and protected species surveys.
- 5.30 A qualitative assessment of the biodiversity impact of the scheme is provided in Table 8.

Table 8. Qualitative Assessment of Biodiversity Impact

Baseline Habitat	Ecological Function	Impact	Post-Development
Grassland – modified	Provides limited habitat opportunities for a range of local wildlife including bats, birds, reptiles and invertebrates	Minor loss of resource (13.16ha equating to 9.7% of existing)	Areas of c. 1.96ha of modified grassland will be retained as amenity grassland within areas of formal Public Open Space in the development area. Additionally, retained areas of modified grassland will be enhanced (c. 14.85ha within SANG area in total) with a target of 'moderate' condition through appropriate management. A further c. 4.89ha (within SANG area)

			and 0.72ha (within development area) of wildflower grassland ("other neutral grassland") with a target condition of 'good', will be created through overseeding using a wildflower mix and appropriate management. This will increase floral diversity, resulting in an increase in invertebrate diversity and provide new opportunities for birds, reptiles, bats and mammal species, for example.
Woodland and forest- Other woodland; broadleaved	Provides habitat for a range of wildlife including bats, birds and invertebrates	All retained or enhanced.	An area of 0.14ha of broadleaved woodland which is already in 'good' condition will be retained. Two further blocks of woodland, totalling 5.31ha will be enhanced with a target condition of 'Good'. This will help increase opportunities for a variety of wildlife including birds, bats, invertebrates, reptiles and amphibians.
Heathland and Scrub – Mixed Scrub and Bramble Scrub	Provides habitat for a range of wildlife including bats, birds and invertebrates	Loss of resource 0.09ha	An area of 0.12ha of mixed scrub (thicket planting) within the development area is proposed with a target condition of 'moderate'. This will increase opportunities for a range of fauna including nesting birds.
Hedgerows / Tree Lines /	Provide connectivity, foraging and nesting resources for local wildlife (e.g. birds and bats)	The majority of hedgerows / habitat connectivity will be retained but there will be a loss of 0.17km (equating to 4.79%)	The majority of hedgerow provision will be retained, with most hedgerows already in 'good' condition. This will retain on-site opportunities for a range of fauna. There is also scope for new hedgerows to be provided alongside the development, increasing connectivity and the ecological functionality of these features.

5.31 Ecological functionality will be maintained at the Site through the retention of the vast majority of hedgerows and tree lines. There is also significant scope for new tree and woodland planting, as well as areas of mixed scrub (thicket planting) within the development area and SANG, as shown on the Landscape Strategy and SANG Design Plan (CSA/2646/114/L). Enhancement of modified grassland will provide opportunities for a range of species, as will the enhancement of retained woodland habitat. These measures will offer new resources for a number of species groups, including bats, birds, reptiles, mammals and amphibians.

Trading Summary

- 5.32 In this instance, the 'Trading Summary' indicates that there will be no losses unaccounted for.

6.0 CONCLUSION

- 6.1 Biodiversity Net Gain calculations, using the Biodiversity Metric 2.0 (Beta Version, December 2019) have been undertaken for the proposed development at Land at Bird in Eye Farm, South of Bird in Eye Hill, Uckfield. Baseline habitat calculations have been informed by Phase 1 habitat survey work and subsequent condition assessments, and a desk-stop study. Post-development calculations have been made based on the Illustrative Site Layout Plan (Ref: PRB/BIE/PA2N) and the Landscape Strategy and SANG Design Plan (CSA/2646/114/L). Assumptions and limitations to the assessment have been highlighted where relevant, and identified in the Metric calculator which should be reviewed in conjunction with this report.
- 6.2 An overall net gain of 65.77 habitat units (50.79% net gain) and 11.11 hedgerow units (4.05% net gain) was identified following the completion of baseline and post-development calculations, with large areas of existing habitats being retained and/or enhanced, as well as the creation of new habitats including woodland and tree planting, SUDs, wildlife ponds and thicket planting.
- 6.3 As such the scheme has the potential to exceed the 10% net increase in biodiversity mandated by the Government and expected to be required under the forthcoming Environment Bill. This will help ensure that net gains are provided for biodiversity, as stated within Chapter 15, paragraph 170 of the NPPF (2019).

7.0 REFERENCES

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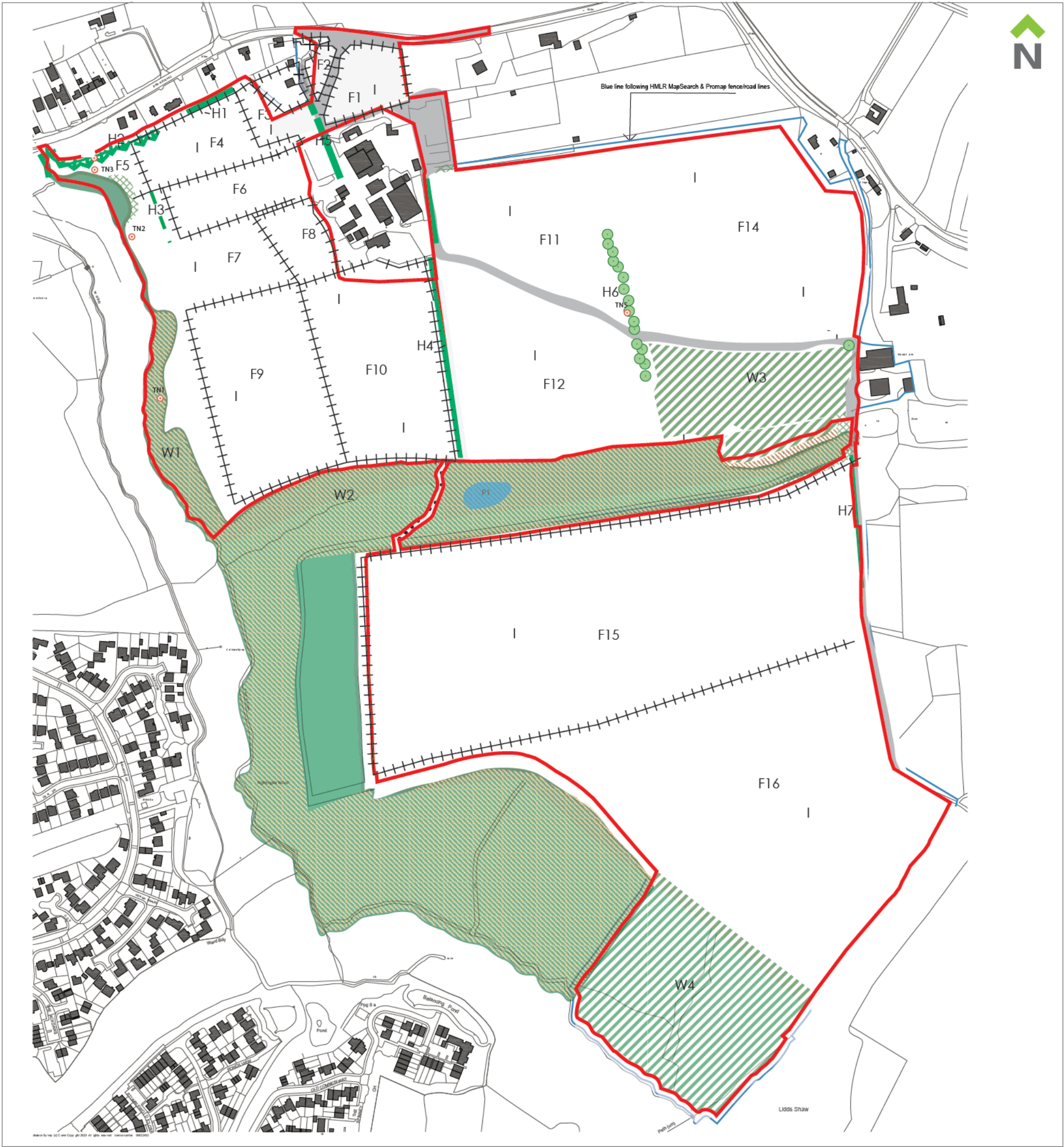
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Appendix A

Habitats Plan (CSA/2646/108)



Application Site Boundary

Improved Grassland

Ancient Woodland and Number

Broadleaved Woodland

Hedgerow and Number

Hardstanding

Scrub

Tall Ruderal Vegetation

Pond and Number

Plantation Woodland

Line of Trees

Target Notes

TN1- Bluebells in Woodland

TN2- Trees with woodpecker holes providing bat roost potential. Tree Creeper seen entering a woodpecker hole

TN3- Spoil/Log Piles

TN5- Barn Owl Sighting

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Project	Land at Bird in Eye Farm South of Bird in Eye Hill Uckfield	Date	April 2021	Drawing No.	CSA/2646/108
Drawing Title	Habitats Plan	Scale	See Bar	Rev	C
Client	Croudace Homes Limited and Mr & Mrs Berry	Drawn	TF	Checked	CC

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Appendix B

Illustrative Site Layout Plan (PRB/BIE/PA2N)



- KEY**
- Application Site Boundary
 - Area of land retained for Bird in Eye Farm
 - Area of land for SANG (part only shown)
 - Ancient Woodland
 - Ancient Woodland buffer - 15M
 - Existing Hedges with 5M buffer zone
 - Existing watercourses
 - Existing overhead electricity cables
 - Location of Listed Oast house
 - Proposed main site access
 - Proposed Visibility Splays
 - Proposed pedestrian/cycle access to connect to existing F.P. network
 - Proposed 5M landscaped buffer to farm & existing adjacent housing
 - Proposed Open Space area
 - Proposed Local Equipped Area of Play
 - Proposed footpath/cycleway
 - Potential informal footpaths within open space
 - Proposed balancing pond
 - Proposed swales
 - New tree planting within Public Realm
 - New hedgerow buffers within Public Realm
 - New trees within garden areas
 - Proposed garden planting

Rev: N 27/04/21 Joint applicant names added. Title block revised.
Rev: M 01/03/21 Red line adjacent Halliwell Farm revised.
Rev: L 24/03/21 Red line & SANG boundary updated. Road adjacent parcels N & P realigned. Parcel B revised to suit amended Lycroft boundary.
Rev: K Draft 10 10/12/20 Flat blocks in parcels B & C revised. Unit numbers change in parcels B, C, F, G & H.
Rev: J Draft 9 18/12/20 Numbers of flats reduced, more housing. Parcels C, F & G.
Rev: I Draft 8 28/06/20 SANG parking increased to 30 units.
Rev: H Draft 7 26/06/20 Latest swale & pond layout added. Existing house accesses revised. House on perimeter changed.
Rev: G Draft 5 19/05/20 First version fully coloured.
Rev: F Draft 6 26/05/20 General updates.
Rev: D Draft 4 07/05/20 Exstg trees added. LEAP revised. Play area removed. Pond updated. Parcel H extended. Parcels QR omitted. Road alignment & boundary amended.
Rev: C Draft 3 17/04/20 Fully revised 282 units. Badger sett & barn owl box added. Swale added.
Rev: B Draft 2 15/04/20 southern SANG parking removed. Lycroft access shown. Farm access added. Eastern farm track added. Play areas removed. SANG track removed.
Rev: A Draft 1 14/04/20 286 units.

Applicants:
Croudace Homes Ltd and Mr. & Mrs. Berry

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Land at Bird in Eye Farm, South of Bird in Eye Hill,

UCKFIELD

Illustrative Site Layout

Ref: PRB/BIE/PA2N

Apr 2020

Appendix C

Landscape Strategy and SANG Design Plan (CSA/2646/114/L)

1. Public Open Space

The site benefits from approximately 75% being designed as public open space. Multi-functional green corridors, with new tree planting will break up the development parcels and provide a strong landscape framework for the new housing.

A key feature of the site is the green corridor, with planting designed to frame views of The Oast (Grade II Listed) within the Bird in the Eye Farm complex. A low cut hedgerow on the edge of the farm complex will allow for the building to be seen from within the public open space, while the green corridor will frame the views towards it, respecting its setting and enabling the building to continue to be seen from the higher parts of the town further to the west.



2. Strategic Suitable Alternative Natural Greenspace

A large area of land to the east and south of the new housing will be provided as a Strategic Suitable Alternative Natural Greenspace (SANG) providing a significant recreational resource adjoining the site and for the wider town. A car park within the area will allow for dogs to be off leads from the point they leave the car. A 2.7km circular walking route will be provided with secondary walking routes which link to the main one, offering users opportunities to vary their routes. The primary walking route will connect to public footpath Framfield 65b, which extends along the outside of the south eastern boundary of the Strategic SANG, opening the opportunity for access to the wider footpath network and longer walks. Planting within the Strategic SANG, including areas of woodland, trees and wildflowers, will draw the eye and add to the experience of the routes through the seasons. This new planting, as well as the establishment of a wildlife pond, will offer further biodiversity benefits and habitat creation.



3. Biodiversity Enhancements

The Site provides significant scope for a range of biodiversity enhancements to be delivered alongside the new development and Strategic SANG. New woodland and tree planting will strengthen existing habitat and maintain the ecological functionality of these features for dormice and foraging bats which have been recorded within the Site. New areas of wildflower planting will diversify the existing range of flora and provide new habitat for reptiles and invertebrates. In addition, the inclusion of dormouse nest boxes, bat boxes, bird boxes and the creation of log piles for reptiles will provide further opportunities for these species across the Site.



Consented Outline Application
WD/2010/2874/FE
146 dwellings and associated infrastructure

4. Retained Woodland and Trees

The site benefits from woodland and trees of high arboricultural and landscape quality, which are located on the boundaries. The vast majority of these can be protected, with some enhancements to provide further structure to the site.

Bird in the Eye Shaw, which bisects the site is a significant landscape feature, and will provide a mature backdrop to the development, as well as a sense of continuity, and of place. In addition, the woodland on the boundaries of the southern part of the SANG, including Nightingale Wood, will separate the walking routes from the new housing to the north, and indeed from the existing town to the west. Both Bird in the Eye Shaw and Nightingale Wood are designated as Ancient Woodland, and woodland margin planting and setting the development well back from the edge of Bird in the Eye Shaw will ensure their long term protection.



5. New Tree and Hedgerow Planting

Extensive native tree and hedgerow planting to be undertaken within the public open space to complement the well-wooded landscape character of the area and add to its wider green infrastructure. This will also provide opportunities for ecological enhancements.

Woodland margin planting on the northern edge of Bird in the Eye Shaw (Ancient Woodland) will provide planted protection to the woodland linking to the ecological corridors through the public open space of the development.

Street trees will be planted in the verges along the roads, and in the pocket parks to bring the benefits of green infrastructure into the centre of the development, in the form of improving air quality, providing wildlife refuges and assisting in absorbing surface water run-off.



6. Sustainable Drainage Features

Sustainable drainage basins to be located within the public open space. These basins will be planted with marginal plants which will offer enhanced ecological and habitat benefits.



7. Children's Play Provision

A LEAP (Locally Equipped Area for Play) will be located within public open space positioned centrally within the proposed residential area. This will allow easy access for residents. The LEAP will be designed in a 'rural style', incorporating timber elements of natural play befitting the settlement edge location of the Site. It will predominantly be aimed at younger children (up to 8 years) and will provide a range of play experiences and opportunities.



Proposed	Existing
Application boundary	Existing trees / vegetation
Structural Tree Planting Mix	Trees / vegetation removed
Woodland Margin Planting Mix	Existing public footpath
Thicket Mix	
Proposed Street / POS Tree	
Ornamental tree	
Native hedge planting	
Ornamental shrub / herbaceous ornamental grass planting	
Wildflower and marginal planting in attenuation basin	
Amenity grass	
Longer grass	
Wildflower meadow	
Natural Succession	
Wildlife Pond	
Recreational footways	
Proposed cycleway	
Play areas - LEAP	
Rustic Post and Rail Fencing	
Timber seating	
Dog waste bin	

Strategic SANG walking routes
Primary walking route within mown grass paths
Secondary walking route with mown grass paths

Rev	Date	Description
L	09/05/21	AS Updated comments from Land Trust
J	01/06/21	AS Updated comments from Land Trust
H	04/06/21	SP Amended site boundary
G	02/03/21	AJ Amended to new site boundary
E	29/09/20	PH Amended to learn comments
C	21/09/20	PH Amended to learn comments
B	12/03/20	PH Amended to match layout
A	30/05/20	PH Amended to match layout

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Client Croudace Homes Ltd.
Scale 1:1250 @ A0
Date April 2020
Drawing No. CSA/2646/114
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