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8th April 2026

RE: Land East of Westergate (Ref: AL/11/24/OUT)

This letter serves as an update and summary of the status of the ecology work at Land East of Westergate. This letter should be read in conjunction with the submitted ecological information:

- Land East of Westergate EcIA (2024)
- Land East of Westergate Biodiversity Net Gain Assessment (2024)

In addition, two letters with further information were sent to Arun District Council in 2024 (**Appendix 1**).

Updated Walkover (2026)

An updated walkover of the site was completed by Lyndsey Barratt BSc (Hons) PGCert MCIEEM (Principal Ecologist of Ecosupport Ltd) with assistance from Shannon Dagnell MBiol (Project Ecologist with Ecosupport Ltd) to assess the status of habitats on-site on the 24th of March 2026. All areas of the site were accessible during this time allowing a thorough assessment of habitat condition.

Modified Grassland

This was found to still be the dominant habitat on-site. As previously noted, frequent mowing and access by dog walkers has largely maintained dominance of coarse grass species, ground damage, and a homogenous grassland structure. Dense patches of Nettle (*Urtica dioica*) were noted around the field peripheries, and isolated patches of Meadow Foxtail (*Alopecurus pratensis*) were noted in less trampled areas. Species present still indicated high levels of nutrient levels within the soil.

During the previous condition assessment (2023), the modified grassland throughout the site was considered to be of *moderate condition*; meeting the criteria for at least 6-8 species per m² but failing the criteria for varied structure and scrub management. Based on the latest visit, the modified grassland is still considered to be of moderate condition.

Figure 1. Modified grassland (March 2026).



Other Neutral Grassland

Less accessible parcels of grassland support increased species diversity. These areas have been left unmanaged and in places are starting to succeed into scrub. Despite this, species noted during March 2026 were consistent with previous surveys. These grassland patches will benefit from a management regime in future to prevent complete succession into scrub.

The Other Neutral Grassland habitat on-site is considered to still be in *moderate condition*.

Figure 2. Other neutral grassland beginning to show scrub encroachment (March 2026).



Wet Woodland

Due to recent high levels of rainfall, the understorey of the wet woodland was holding a lot of overspill from adjacent ditches. Despite this, the woodland was visible from dry areas around the peripheries. The understorey has become

densely overgrown with Bramble scrub, with paths existing between scrub patches. Crack Willow (*Salix fragilis*) still dominates the canopy.

The wet woodland is still considered to be of *moderate condition*.

Figure 3. Open understorey and Bramble overgrowth in the wet woodland (March 2026).



Bramble Scrub and Winter Stubble

Although these habitats do not require a condition assessment, the updated walkover included an assessment of the potential for these habitats to support protected species. Most notably, the extent of Bramble scrub was checked and any new management of the cropland identified that could make the site more favourable for protected species in recent years.

Although the thickness of scrub has increased in less accessed areas of the site, the existing corridors of dense vegetation have largely remained the same.

The parcel of arable land was found to be seeded up with a Ryegrass ley. The crop area supported very few weeds and a lot of exposed, bare ground, indicating regular herbicide application. The boundaries of the cropland were found to be consistent with previous site visits.

Figure 4. Ryegrass ley (March 2026).



Hedgerows

All previously mapped hedgerows were found to be present and unchanged. Many continue to be protected by a buffer of bramble scrub and nettle between the field parcels and the linear features. No evidence of tree removal or any significant change in management regime was identified.

Lidsey Rife

Lidsey rife supported a constant flow of water from north to south. The banks were mown on the western side indicating that the waterbody is still subject to a management regime by the landowners. The western bank of the waterbody (outside of the site boundary) was scrubbed over and was causing partial shading of the stream.

Figure 5. Lidsey Rife.



Protected Species

The Ecological Impact Assessment identified several protected species on-site. Bats were confirmed to be present, with foraging and commuting activity observed for various species, including rare ones such as Barbastelle (*Barbastella barbastellus*) and Bechstein's Bat (*Myotis bechsteinii*). Additionally, a Common Pipistrelle (*Pipistrellus pipistrellus*) and Soprano Pipistrelle (*Pipistrellus pygmaeus*) summer day roost was found within one retained tree. Other bat species recorded during surveys included Serotine (*Eptesicus serotinus*), Noctule (*Nyctalus noctula*), Leisler's Bat, Plecotus spp., Myotis spp., and Natterer's Bat.

Low populations of Slow Worms (*Anguis fragilis*) and Common Lizards (*Zootoca vivipara*) were confirmed on-site, primarily in areas with longer grassland and unmanaged field boundaries. The site also supports a variety of bird species, including seven red-listed species such as Song Thrush (*Turdus philomelos*), Yellowhammer (*Emberiza citrinella*), and Lesser Spotted Woodpecker (*Dryobates minor*), as well as five amber-listed species, including Dunnock (*Prunella modularis*) and Whitethroat (*Curruca communis*).

The site provides suitable habitat for Western European Hedgehog (*Erinaceus europaeus*), with moderate to high

potential for their presence due to the hedgerows, scrub, and wet woodland that offer shelter and foraging opportunities. Although no evidence of Water Voles (*Arvicola amphibius*) was found during surveys, the stream habitat on-site has the potential to support dispersal and seasonal use by this species. Similarly, no evidence of Hazel Dormouse (*Muscardinus avellanarius*) was found during surveys, but the site holds moderate potential for their presence due to the diverse hedgerows, scrub, and wet woodland.

No evidence of Great Crested Newts (*Triturus cristatus*) or Badgers (*Meles meles*) was found during the surveys. However, the site was assessed to have high potential for foraging and commuting Badgers due to the presence of suitable habitats such as hedgerows and mammal trails.

Throughout the updated walkover, an updated check for mammal runs and burrows was completed. Mammal runs were notable to the east of the cropfield, however, these had Deer prints and were of a shape and size indicative of Deer usage. Despite this, the eastern boundary was checked for evidence of Badgers (hairs, prints, latrines, fresh digging) and no signs were located.

Given that the extent of habitat on-site remains largely unchanged, the protected species data from the 2023 suite of surveys is still considered to be up to date for the current application. However, due to the mobile nature of many species, and early indications of scrub encroachment, it is recommended that the full suite of surveys is updated to support any future detailed applications.

Outstanding Objections

An outstanding objection to the scheme by the ecology officer within Arun District Council for the scheme failing to achieve no net loss on site is still being held. The scheme was redesigned in 2024 to retain habitats of high distinctiveness (including the wet woodland) with a robust lighting strategy ensuring protection of the retained habitats from occupational impacts (**Appendix 2**). The design has additionally focused on planning residential parcels around existing linear features and high distinctiveness habitats; focusing on utilizing existing areas of grassland and cropland for the eventual development, thus following the mitigation hierarchy.

Most of the loss in habitat units on the site is being caused by the loss of modified grassland to make way for the development. Although reducing the size of the scheme would result in a positive outcome for BNG, it would significantly reduce the viability of the scheme and result in much of the land within the redline being used to offset BNG.

In the time since submission of the application, much has progressed in BNG legislation, including the introduction of mandatory BNG (Environment Act, 2021) and follow-up statutory guidance on the use and interpretation of the metric. At the time of submission, the sole guidance on BNG requirements were the adopted Arun Local Plan 2011- 2031 policy ENV DM5 Development and Biodiversity and the NPPF (prior to the 2023 update to include mandatory BNG). These policies combined required no net loss of biodiversity as part of the scheme, however, the interpretation of this legislation during the planning process is that there should be no net loss on-site.

The subsequently adoption of mandatory BNG and subsequent advice by Arun District Council¹ states that, providing the mitigation hierarchy is followed, offsite BNG compensation is acceptable. Utilising such a scheme will additionally

¹ <https://www.arun.gov.uk/biodiversity-net-gain-information-and-guidance/> [Accessed 8th April 2026].



result in the securing of off-site habitat for 30 years for enhancement purposes, a marked improvement to the status quo.

Conclusion

In summary, the updated walkover confirms that the site remains broadly consistent with the baseline ecological work submitted in support of the application. The retained habitats continue to be appropriately buffered and incorporated within the design, and the ecological evidence remains sufficiently up to date to support the current proposal. While the scheme does not achieve complete no net loss on-site, current biodiversity net gain policy and guidance allow for off-site compensation where the mitigation hierarchy has been followed and the compensation is secured for the required period. On that basis, the proposal should be regarded as acceptable from an ecological perspective, subject to the implementation of the agreed mitigation, enhancement and biodiversity net gain measures.

Kind regards,

Lyndsey Barratt BSc (Hons) PGCert MCIEEM

Principal Ecologist



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3rd June 2024

Dear Mr Best,

RE: Ecology Consultee Comments for AL/11/24/OUT

This addendum serves as additional information to the ES chapter and appendices issued for Land East of Westergate regarding the impacts to Water Voles, bats and priority habitats on-site. Additionally, this serves as a response to the following comments received from Chichester District Council in respect of the application:

'Surveys:

The full species surveys have not been provided as part of the application.

The habitat and species surveys have been summarised in the EIA.

The habitats assessment was undertaken at a sub-optimal time in January. This is a significant limitation for the results of the assessment.

The EIA lacks detail in relation to the survey of Lidsey Rife chalk stream.

Impacts to invertebrates have not been assessed.

Water Vole is recorded here. The Water Vole Mitigation Guidance (2016), recommends at least two surveys to meet best practice. The survey was only one visit and did not cover the whole length of Lidsey Rife or survey upstream of the site.'

Survey Effort

Following an initial walkover completed in January 2023, the following species- specific surveys were completed to support the hybrid planning application 'AL/11/24/OUT':

- 1 full season of bat activity surveys (April-October 2023) which included all of the core habitat types identified



as supporting potential for foraging and commuting bats (most notably wet woodland, Lidsey Rife, hedgerows and tree lines)

- 1 season (2023) of bat trapping surveys post-maternity period, and encompassing the swarming pre-hibernation period
- 1 full season of Dormouse surveys (April-September (2023)), with an additional ad-hoc check of nest tubes in October)
- A full suite of reptile surveys in Spring 2023
- eDNA survey of the adjacent pond within the church land to the north east
- A full suite of breeding bird surveys in Spring 2023
- Water Vole survey of Lidsey Rife (June 2023)

The full results of these surveys have been provided within ES Appendices 7, with ES Chapter 7 providing a summary. Additional information on the results of the bat trapping surveys are detailed below:

Trap locations

Figure 1. Location of Harp traps deployed in July and August.



Table 1. Detailed result from each of the Harp traps deployed in July and August.

Date	Site Name	Trap	Grid Ref	comment	Total Bats	P.pip				P.pyg				M.bech				M.nat				M.daub				B.barb				Serotine			
						AM	AF	JM	JF	AM	AF	JM	JF	AM	AF	JM	JF	AM	AF	JM	JF	AM	AF	JM	JF	AM	AF	JM	JF	AM	AF	JM	JF
21/07/2023	Westergate	Trap 1	SU 94230 05196	3 BHT AT100	1			1																									
		Trap 2	SU 94197 05029	3 BHT Autobat	7	1			2	1									1	1								1					
		Trap 3	SU 94038 04672	3 BHT Autobat	5		1		4																								
13/08/2023	Westergate																																
		Trap 1	SU 94198 05029	3 BHT Autobat	5					1	1	1						1								1							
		Trap 2	SU 94211 04688	3 BHT AT100	9	1	1		2		1	1	1				1				1												
		Trap 3	SU 94038 04672	3 BHT AT100	5				2		1			1				1															
					32																												

With the provision of the above, all detailed protected species survey results have now been provided.

BNG and Habitat Condition Assessment

The initial UKHabs survey was completed in January 2023 to identify potential for protected species ahead of the commencement of the survey season. The habitats were monitored and regularly re-assessed continuously between March-October 2023 to gain an understanding of the management regime and to identify flowering perennials that were not identified during the initial visit. As a BNG assessment was not initially provided as part of this application these details were not included. Please refer to the associated BNG report (Ecosupport, 2024) for full details of the condition assessment.

Lidsey Rife

Via email correspondence in April 2024 (see attached), it has been agreed that a pre-commencement condition of the granted planning permission should include a detailed MoRPH river condition assessment of Lidsey Rife with the aim of ensuring the quantitative retention of the river condition after installation of the proposed bridge. An updated Water Vole survey of the Rife will be completed alongside the condition assessment to check for burrows, where possible, within the area of impact (considered 50m either side of the proposed bridge). This condition can be discharged via an enhancements report.

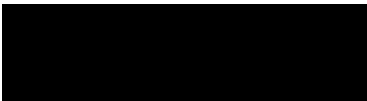
Invertebrates

The habitats identified on-site included winter stubble/cereal crop, improved grassland, scrub, wet woodland, tree lines, a ditch system throughout, and Lidsey Rife to the east. With the exception of the woodland and the rife, the habitats on-site were heavily managed by regular mowing and were frequently used by local dog-walkers. Due to the retention of the woodland and the rife it's not considered imperative to complete detailed invertebrate surveys of these habitats.

Water Vole Mitigation

Updated Walkover

The location of bridge will be clearly marked by an engineer and/or appropriate personnel. An ecologist will then undertake an updated survey of this area, and 50m upstream and downstream, prior to works commencing. This survey should be completed between April-October when Water Voles are most likely to be active. To discourage future colonisation of the area of impact, if no evidence of Water Voles is found bankside vegetation will be strimmed to bare earth either side of the rife under supervision of a suitably experienced ecologist. All arisings will be raked off and removed from site. The habitat should then be maintain to a height below If evidence of Water Vole presence is



noted during the survey, works may need to take place under a Natural England licence and an updated mitigation strategy should be accordingly compiled and submitted to the LPA. If necessary, this will include the potential temporary displacement of Water Voles and ensuring bankside habitat incorporates plenty of areas above the predicted water level of the ditch for the creation of burrows post-development.

Ecology Buffer

A grassland buffer will be maintained within the flood zone of Lidsey Rife. The detailed planting prescriptions are provided within the associated BNG report.

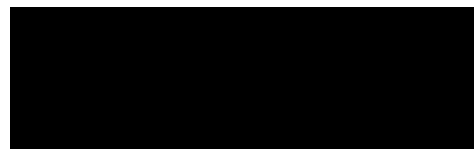
During the construction phase of the development, the stream corridor will be safeguarded from potential harm through the establishment of ecological protection zones (EPZs). This will incorporate at least a six meter buffer either side of the ditch. Fencing and signage will be used to ensure that there is no encroachment from construction traffic or storage of materials. If works must encroach into this area to facilitate the development (i.e. for the installation of the public footpath) then this will be first and subsequently supervised by the site designated Ecological Clerk of Works (ECow).

Water Pollution

A number of hazardous materials are associated with construction projects. Not only can this lead to contaminated soil, but the site is particularly vulnerable to issues with run off with risk of hazardous substances entering the ditch network and Lidsey Rife. **Table 1** contains a variety of procedures to prevent ecological implications from hazardous substances. These details will be further expanded upon by the completion of a Construction Environment Management Plan (CEMP) which will provide further detailed mitigation measures to minimize the impact of construction-related pollution on the aquatic systems within the development (which in turn will provide protection to local Water Voles from pollution events).

Table 1. Practical measures and sensitive working practices involving hazardous substances.

Issue(s) to Control	Best Practices to be adopted
Containers	• Use containers designed to minimise spills. • Ensure that containers used are appropriate to the substances contained (e.g. do not react with the substance, resistant to corrosion). • Ensure that containers are maintained in good conditions and securely closed. • Locate secondary containment store as far away from environmentally sensitive areas such as watercourses and water discharge points as possible. • Store goods away from heavily trafficked areas to avoid container damage. • In each storage area: • Ensure that only the substance(s) specified are stored. • Provide secondary containment or drip trays, and impermeable floor and bunding. • Prevent unauthorised access by providing locks to the storage areas.



Cleaning up minor spills	• Use sand, saw dust, or spill kit to absorb the spill and prevent it from spreading. • Dispose of the contaminated absorbent material as chemical waste. • Ensure that saw dust, spill kits, etc are readily accessible and of enough quantity.
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‘Further species surveys required for:

Water vole- resurvey

Reptiles- resurvey

Bats- resurvey, activity and roost survey

Nesting birds- resurvey

Hedgehogs

Invertebrates

And

Lidsey Rife habitat condition and health of the chalk stream’

It is unclear what the justification for the repeating of the above surveys is. CIEEM guidance¹ on the validity of ecology surveys states that surveys completed within the last 12 months are valid in most cases. With the Water Vole, reptile, bat and nesting bird surveys completed during the last survey season, these are still considered valid.

As mentioned previously, an updated Water Vole survey will be completed prior to works commencing due to the mobile nature of this species.

Hedgehog surveys were not completed in support of this development. It is not considered proportionate to complete Hedgehog surveys for a development of this nature as Hedgehogs are assumed to be likely present in all cases. Mitigation for other protected species on-site, including a reptile capture and supervised topsoil strip provides the opportunity to search for and move any animals being directly impacted by the stripping of habitats. There is currently no statutory requirement to survey for Hedgehogs, and consideration to enhancements for Hedgehogs have, and will continue to be, considered in the design of the development as it progresses through detailed design. Features already proposed include Hedgehog highways and Hedgehog homes. Once detailed plans have been compiled, the exact locations of these can be provided.

Please see refer to page 3 in reference to invertebrate surveys and a condition assessment of Lidsey Rife.

‘Biodiversity Net Gain (BNG):

At the pre app stage it was advised to undertake an BNG assessment using the Biodiversity Metric. No details of BNG have been provided.

A statutory BNG metric should be submitted so we can fully understand the habitat losses and gains.

The EIA refers to BNG in para 8.1.5.1 Dar Corridors, but no report has been attached to the application.

¹ <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>



Biodiversity Net Gain is required as part of the Environment Act, NPPF and Arun Local Plan'

A BNG report has now been compiled and should be read in conjunction with this letter.

Kind regards,

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Senior Ecologist



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24th October 2024

Dear Arun District Council,

RE: BNG Mitigation Hierarchy at Westergate (AL/11/24/OUT)

This technical summary report serves the purpose of supporting an existing hybrid planning application for the construction of up to 400 residential units together with associated access and landscaping to Arun District Council Planning. This application forms part of strategic site SD5.

Although the application was not subject to mandatory BNG, as part of the planning application information on how the site will achieve a net gain for biodiversity was requested to conform to the local planning policy ENV DM5.

Methodology

As part of the early stages of the design process, Ecosupport Ltd were commissioned by Cala Homes and Luken Beck to complete a baseline assessment of the habitats present at the time of survey.

An initial condition assessment, in line with The Biodiversity Metric 4.0 Technical Supplement, was carried out on the site on 18th January 2024 by Adam Jessop MSc ACIEEM, (10 years post MSc graduation experience) and Lyndsey BSc (Hons) PGCert ACIEEM (6 years post PGCert graduation experience) (with several subsequent visits throughout 2023). This was carried out in accordance with the Biodiversity Metric 4.0 Technical Annex 1 – Condition Assessment Sheets (Natural England, 2023) as this was the most up to date metric at the time. The condition assessment was later updated in line with the Statutory Biodiversity Metric Technical Annex 1 (DEFRA, 2023b). The area of identified habitats is calculated in hectares (ha), ignoring linear features or ditches (the area is measured to the centre line of such features). The length of linear features is measured separately in kilometres (km). The dominant habitat type was selected, according to those defined by UKHab Ltd (2023). Where there was disparity between the UK classification for habitat



type and those present within the Statutory Biodiversity Metric calculator tool, this was noted within the condition assessment tables.

Please note, this report needs to be read in conjunction with the latest version of the submitted BNG metric for the site (Ecosupport, 2024).

Mitigation Hierarchy

The proposed development has been designed to follow the biodiversity gain hierarchy as described in paragraph 186 (a) of the National Planning Policy Framework (DLUHC) which sets out a list of priority actions when achieving a net gain on site:

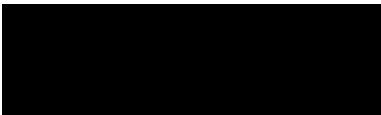
- avoiding adverse effects of the development on onsite habitat with a habitat distinctiveness score, applied in the biodiversity metric, equal to or higher than six;
- so far as those adverse effects cannot be avoided, mitigating those effects;
- so far as those adverse effects cannot be mitigated, habitat enhancement of onsite habitat;
- so far as there cannot be that enhancement, creation of onsite habitat;
- so far as there cannot be that creation, the availability of registered offsite biodiversity gain;
- so far as that offsite habitat enhancement cannot be secured, purchasing biodiversity credits.

As per the ‘Biodiversity net gain. Good practice principles for development. A practical guide’ produced by CIEEM, following mitigation hierarchy is essential when undertaking BNG assessments. The mitigation hierarchy can be defined as “a sequential order of mitigation actions” when achieving BNG – see **Figure 1**.

Figure 1. The mitigation hierarchy (Natural England, 2022)



Following a consultation with Cala Homes, Luken Beck, and Arun District Council in order to minimise the loss of biodiversity on site, the following habitats are being retained / enhanced / created:



- Priority habitat wet woodland (0.8ha enhanced)- All of the priority habitat wet woodland will be retained and enhanced on-site. Enhancement will follow the recommendations within the submitted BNG technical note. This serves to also retained the key area of the site utilised by bats.
- Modified grassland (0.591ha)- The largest habitat loss on-site is from the loss of modified grassland to make way for the development. Where areas of grassland in high traffic areas have been proposed within the scheme, these will be planted with a nutrient-tolerant seed mix that can withstand use as an amenity area.
- Other neutral grassland (2.608ha created, 1.128ha enhanced from modified grassland)- The majority of the low distinctiveness grassland loss will be mitigated through the creation of good condition medium distinctiveness other neutral grassland. This is the dominant landscaping on-site, with the habitat being created from seeding with a mix with increased species diversity.
- Mixed scrub (1.046ha)- The loss of Bramble scrub will be mitigated through the planting of good condition mixed scrub. This will be focused on the northern half of the site where Bramble scrub is currently concentrated.
- Traditional orchards (0.297ha)- A traditional orchard will be planted within the centre of the site. This habitat has been chosen because it is of high distinctiveness and will form a good supplementary foraging resource for local bats. The orchard will be situated between a hedgerow and scrub.
- Urban & Rural trees (0.651ha & 0.395ha, respectively)- The majority of tree planting will be concentrated alongside the spine road running through the development and between the curtilages of the new properties. In addition, groups of moderate condition trees will be planted within the area of other neutral grassland.
- SuDS (0.195ha)- The northern attenuation basin will be designed to only temporarily hold water during high rainfall events. This area will also serve the purpose of providing open space for public use during dry weather. As such, this habitat has been recorded as a 'low' distinctiveness habitat to reflect the intended use.
- Non-priority habitat ponds (0.85ha)- The middle and southern SuDS will be lined so they permanently hold water. This is to create a permanent wetland habitat on-site which is sympathetic to the flood zone associated with Lidsey Rife.
- Native hedgerow (1.248km)- The majority of hedgerow is being retained, however, 1.248km of hedgerow is being planted alongside the Lidsey Rife and the railway line to the south.

All steps have been taken to maximise the biodiversity net gain on site, including the retention and enhancement of all of the wet woodland, and the retention and enhancement of 1.128ha of modified grassland into other neutral grassland. In addition to this, habitat creation in the form of a traditional orchard and further other neutral grassland has been proposed, along with extensive tree planting throughout the site. Habitat loss on site has been minimised to only areas required to facilitate the development, protecting the habitats of higher ecological value present on site.

Metric Calculations

Following the incorporation of the above measures into the Statutory metric, *on site there is a net loss of -11.32% (or -9.41 habitat units)* (see **Fig 2** below). In addition to this, with the extensive hedgerow planting on site, *on site there is a net gain of 84.71% (or 3.91 hedgerow units)*.



Figure 2. Final headline result from the Westergate BNG (as per the October 2024 version of the submitted metric).

FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-9.41		
	Hedgerow units	3.91		
	Watercourse units	0.65		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-11.32%	Total net gain achieved is less than target set ▲	
	Hedgerow units	84.71%		
	Watercourse units	26.53%		
Trading rules satisfied?	No - Check Trading Summaries ▲			
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	0.00%	83.17	83.17	9.41
Hedgerow units	0.00%	4.62	4.62	0.00
Watercourse units	0.00%	2.44	2.44	0.00
				No additional hedgerow units required to meet target ✓
				No additional watercourse units required to meet target ✓
Input errors/rule breaks present in metric ▲				

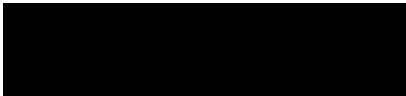
Off- setting Options

Based on the above, additional measures are required to achieve no net loss on-site. It is recommended that either offsite mitigation or a BNG credits scheme is adopted to compensate for the loss of habitats on site and to satisfy the trading summary. To note, there is no requirement under local policy to provide the compensatory habitat through off-setting within the same Local Planning Authority – the distance of the BNG units secured via off-setting is accounted for through the application of the spatial risk multiplier.

To achieve a no net loss and to satisfy the trading rules, the unit shortfall summary states the following number of ‘A1’ biodiversity units are required:

Unit Shortfall by Tier/Module		
Tier	Unit Shortfall	
A1	18.82	▲
A2	0.00	
A3	0.00	
A4	0.00	
A5	0.00	
H	0.00	
W	0.00	
*The spatial risk multiplier has been applied to all unit shortfall values.		

The above considers the ‘worst case scenario’ of purchasing credits through the Natural England statutory credit scheme. To achieve a unit shortfall figure of 18.82, a spatial multiplier of x2 has been applied to discourage use of the statutory credit scheme.



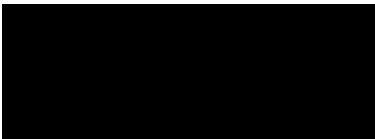
It is anticipated, on granting of planning, that Cala Homes will follow the mitigation hierarchy and utilise 'off-site' credits via a local private agreement, or a private credit provider. This will reduce the number of area units purchased to 9.41. To satisfy the trading rules, 9.41 area units of grassland will be purchased. This application was submitted prior to the statutory requirement for BNG, therefore a suitably worded condition should be used to ensure full details of the credit purchase has been provided prior to commencement of the development.

NB: The details of this letter report will remain valid for a period of 18 months (i.e., until August 2025). Beyond this period, if works have not yet been undertaken, it is recommended that a review of the validity of the conclusions are undertaken. Note that the recommendations within this letter report should be reviewed (and reassessed if necessary) should there be any changes to the development layout which this letter report was based upon.

Kind regards,

Lyndsey Barratt BSc (Hons) PGCert MCIEEM

Senior Ecologist





Legend

- Site Boundary
- Hedgerow
- LAP (u1c)
- LEAP (u1c)
- Pathways (u1c)
- Roads (u1b)
- Urban (ratio of 2:1 buildings/roads to gardens)
- Other Neutral Grassland (g3c)
- Wet Woodland (w1b)
- Modified Grassland (g4)
- Mixed Scrub (h3h)
- SuDS
- Ditch & Stream
- Orchard Planting
- 160 No. Urban Trees
- 97 No. Rural Trees



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Map	BNG Layout
Site	Land at Westergate
Client	Cala Homes
Date	17/07/2024

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