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Biodiversity Impact Calculation

Site Name

Land at Toddington Lane, Wick

Client

Worthing Homes

Issue Date

16th September 2024

Author

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Project No: P2238

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01	**Rozel Hopkins** MSci (Hons)	**Owen Crawshaw** BSc (Hons), MCIEEM	25/03/24	N/A	N/A
02	**Joshua Harwood** BSc (Hons), ACIEEM	**Owen Crawshaw** BSc (Hons), MCIEEM	16/09/2024	Updated metric calculations and site plans based on updated GA	N/A

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About the Author

This report has been prepared by Joshua Harwood, a Consultant Ecologist at The Ecology Co-op, with 8 years' experience. As a member of the Chartered Institute for Ecology and Environmental Management (CIEEM), he is bound by their code of professional conduct.

About the Reviewer

This report has been reviewed by Owen Crawshaw, a Principal Ecologist with over 10 years' experience. As a Full member of the Chartered Institute for Ecology and Environmental Management (CIEEM), he is bound by their code of professional conduct.

Report Summary

Purpose	The Ecology Co-operation was commissioned by Worthing Homes to undertake a Biodiversity Impact Calculation of a proposal to construct ten new residential units on Land at Toddington Lane, using the Statutory Biodiversity Metric, to quantify net change in biodiversity.
Summary of Losses and Gains	The proposed development scheme at this site will result in the **loss** of: • 0.14ha of sparsley vegetated land – ruderal/ephemeral • 0.09ha of grassland – other neutral grassland • 0.06ha of heathland and shrub – bramble scrub • 0.05ha of urban – developed land; sealed surface • 0.0366ha (1 x medium) of individual trees – urban tree Post intervention the following habitats will be **created:** • 0.077ha of grassland – other neutral grassland in poor condition • 0.178ha of urban – developed land; sealed surface • 0.07ha of urban – vegetated garden • 0.114ha (28 x small) of individual trees – urban tree in moderate condition • 0.0651ha (16 x small) of individual trees – urban tree in moderate condition • 0.01ha of urban – introduced shrub • 0.006km of native hedgerow in moderate condition
Final Metric Results	The Biodiversity Impact Calculation has demonstrated that the proposed scheme will result in a likely net gain of 0.04 habitat units (+3.97%). The linear feature calculation for the proposed scheme indicates a likely net gain of 0.03 hedgerow units. The current scheme does not satisfy the trading rules of the Statutory Biodiversity Metric. The calculation has identified a 'Medium Distinctiveness Broad Habitat Deficit' of 0.31 Habitat Units comprised of grassland and heathland and scrub habitats.
Does the scheme meet net gain requirements?	The current scheme **does not** meet the 10% mandatory net gain value set out within the Environment Act 2021 but does achieve the no net loss through development goals detailed by Arun District Council.

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1 INTRODUCTION

1.1 Purpose of the Report

As of the 12th February 2024, there is now a mandatory requirement for all new developments to demonstrate 'net gains' in biodiversity following the release of updated National Planning Policy Framework[1] by the Department of Housing, Communities and Local Government and the Environment Act 2021. A mandatory value of 10% net gain for all developments has also been set out within the Environment Act 2021[2].

This document includes a baseline 'Biodiversity Impact Calculation' (BIC) for the proposed development at Land at Toddington Lane. The calculation utilises the Statutory Biodiversity Metric and assigns 'biodiversity units' to the pre-existing habitats contained within a proposed development site and those that are predicted to be lost, restored and/or created once the development has been constructed. This allows an objective comparison to be made between the existing biodiversity value of a given site and the predicted biodiversity value post development, with the net change in biodiversity value subsequently quantified.

The purpose of this document is to present the findings of the BIC based on the most up-to date existing habitat survey information and the most current outline plans for the proposed development of the site. Biodiversity Impact Calculations provide an evidence base for discussions between the ecological consultant, developer and the local planning authority regarding on-site avoidance, on-site mitigation and off-site compensation requirements.

This report will be used in relation to a proposal for the construction of ten new residential units with associated hard and soft landscaping. Given the likelihood of proposed changes in the design scheme, some of the recommendations will potentially be subject to change. The results of the BIC are deemed accurate for the most recent layout plan, dated March 2024.

This report was commissioned and produced at the request of Worthing Homes.

1.2 Background

The site measures 0.34ha in area and comprises a dilapidated industrial building within an area of hardstanding and bare ground. The hardstanding has not been managed recently and, therefore, ruderal vegetation and scrub has begun to establish. Small areas of dense bramble *Rubus fruticosus* agg. scrub are present along the southern, north-western and eastern boundaries.

A previous ecological assessment of the site was carried out by The Ecology Co-op in February 2017 for a prior planning application of ten residential properties[3]. The Ecology Co-op was then commissioned to undertake

[1] HM Government (2023). National Planning Policy Framework. Department for Communities and Local Government. Available online at: https://assets.publishing.service.gov.uk/media/65819679fc07f3000d8d4495/NPPF_December_2023.pdf

[2] HM Government (2021). Environment Act 2021. Available online at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted

[3] The Ecology Co-op (2017). Preliminary Ecological Appraisal and Phase 1 Habitat Assessment – Land at Toddington Lane, Wick

reptile presence/absence surveys during which a low population of slow worms was identified,[4]. A reptile translocation was then conducted during 2020 after planning permission was obtained[5]. The land was left unmanaged since this reptile translocation, with the reptile fencing left in-situ during this time. Therefore, a new site assessment was carried out in April 2022[6] and subsequent reptile surveys were contracted, with a peak count of four slow worms and two common lizards recorded[7]. Therefore, a reptile translocation was recommended prior to works commencing in addition to precautionary measures for nesting birds, hedgehogs *Erinaceus europaeus* and great crested newts *Triturus cristatus* during vegetation clearance. An updated site visit was conducted by Joshua Harwood on the 29th August 2024 to determine if the site has improved in quality or habitats. This assessment determined that the site has undergone natural succession and ruderal/ephemeral habitats are more prevelant compared to the previous other neutral grassland habitats, as a result of this succession the existing sites baseline is dominated by habitats of reduced distinctiveness. In line with the current guidance the previous baseline habitat mapping and scores have been used.

Habitats (UKHab) within the site and along the site boundaries are shown in (Figure 1), these include:

- Grassland – other neutral grassland
- Heathland and shrub – bramble scrub
- Sparsley vegetated land – ruderal/ephemeral
- Urban – developed land;sealed surface
- Urban – buildings
- Individual trees – urban tree
- Urban – built linear feature

No irreplaceable habitats are present within the development site.

[4] The Ecology Co-op (2017). Reptile Presence/Absence Survey and Reptile Mitigation Strategy - Land at Toddington Lane
[5] The Ecology Co-op (2020). Reptile Translocation at Toddington Lane, Littlehampton
[6] The Ecology Co-op (2022). Preliminary Ecological Appraisal – Land at Toddington Lane, Wick
[7] The Ecology Co-op (2022). Reptile Presence/Absence Survey – Land at Toddington Lane, Wick

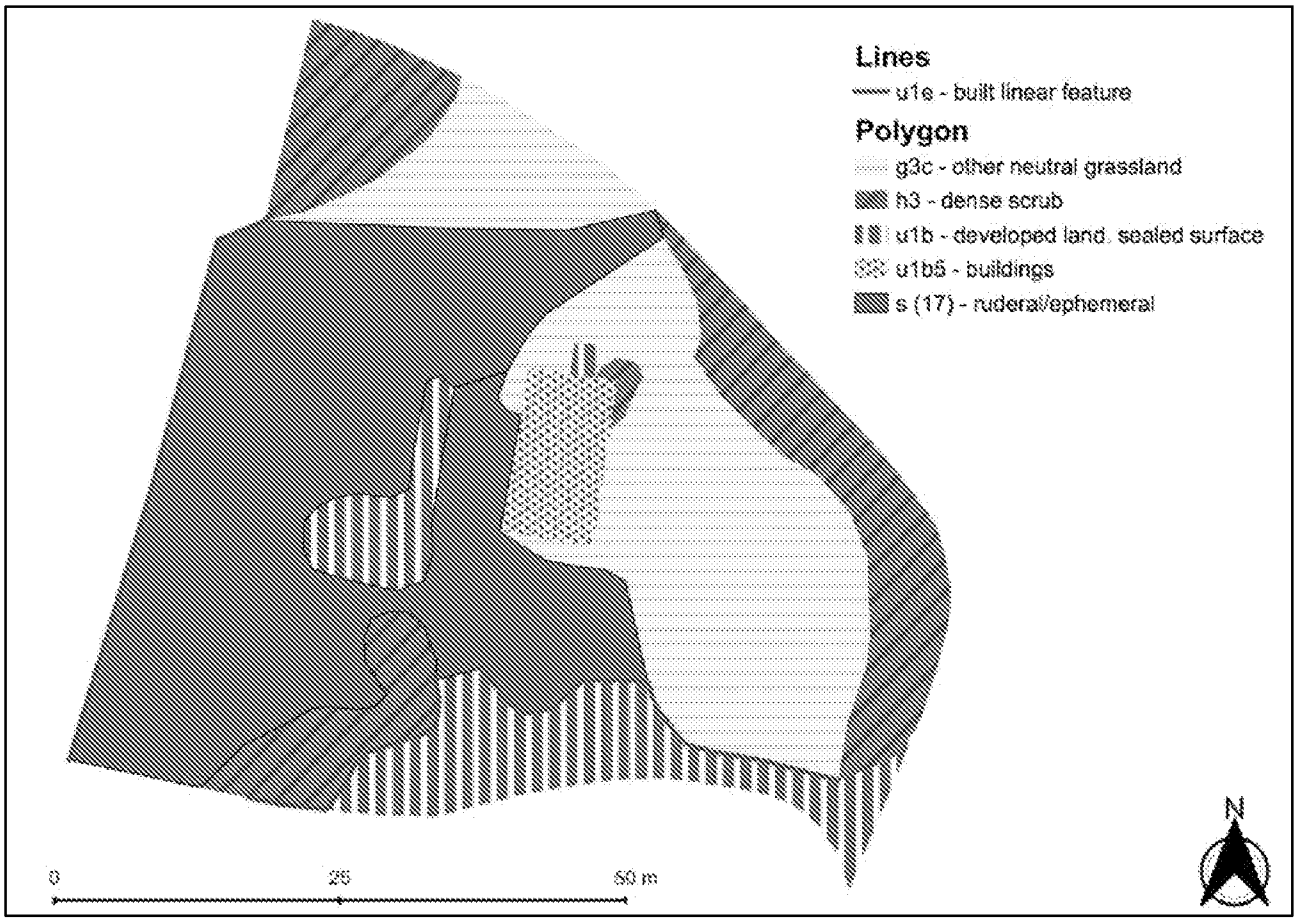


Figure 1. UKHab map showing existing habitats within the site. Produced using QGIS software, version 3.28.0 – Firenze.

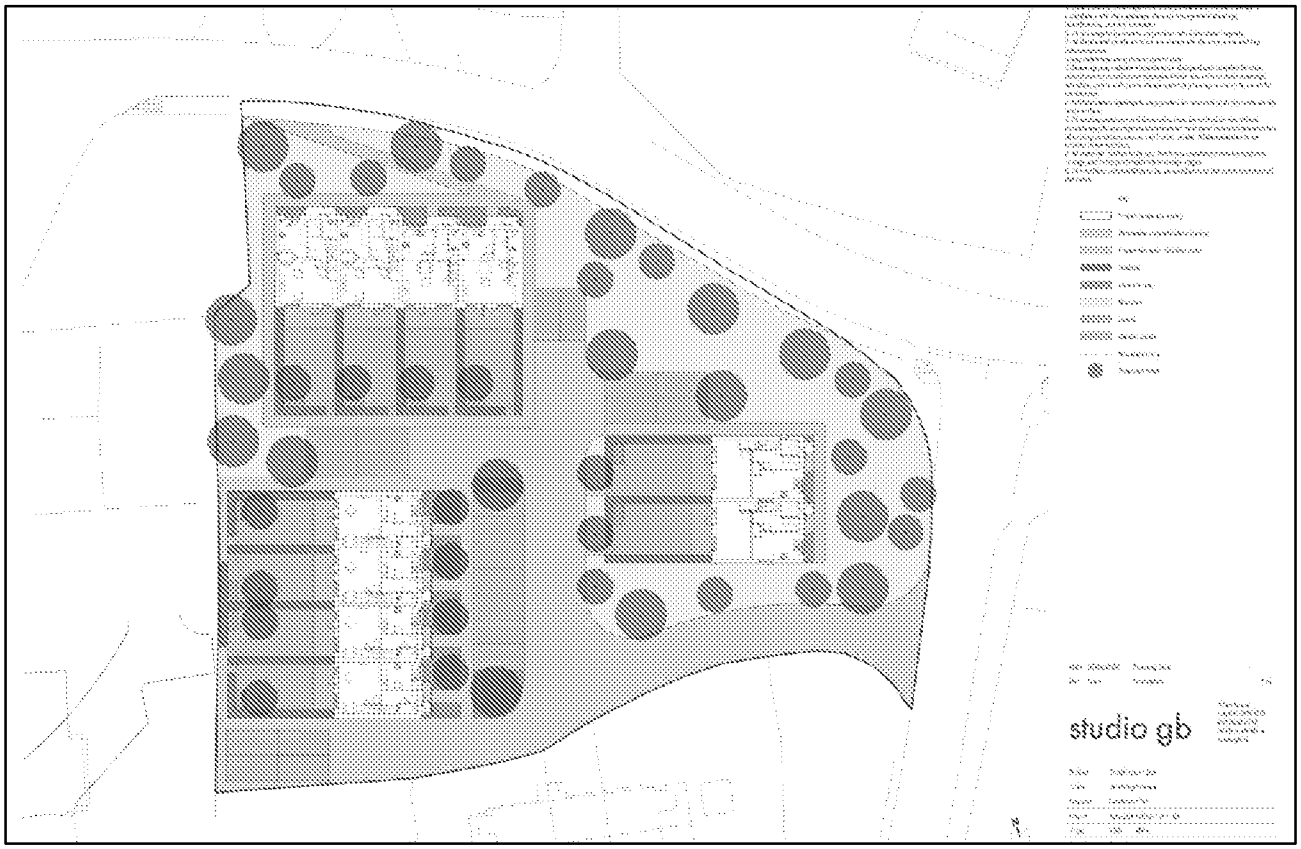


Figure 2. Proposed landscaping plan for the development at Land at Toddington Lane, reproduced from Studio gb, dated

September 2024 (drawing no. TLN-SGB-00-GF-DR-L-101).

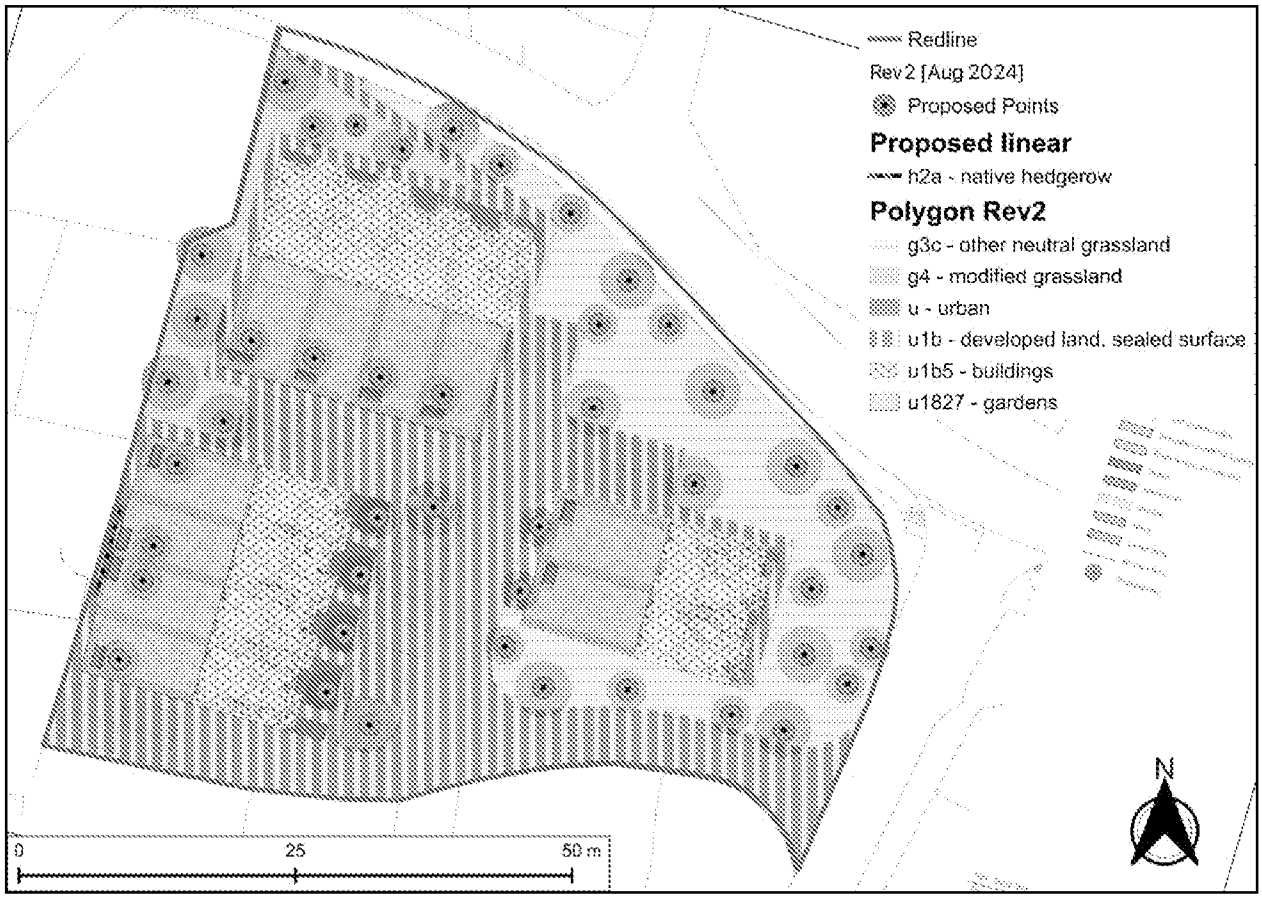


Figure 3. UKHab map showing proposed habitats within the site. Produced using QGIS software, version 3.36.3-Maidenhead.

1.3 Policy and Legislation

NPPF (2023)

The NPPF sets out the Government's view on how planners should balance nature conservation with development and helps ensure that Government meets its biodiversity commitments with regards to the operation of the planning system.

Paragraph 180d, states that planning policies and decisions should contribute to and enhance the local environment by:

- "*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.*"

Paragraph 185b, states that to protect and enhance biodiversity and geodiversity, 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.*"

Paragraph 186d, states that when determining planning applications, authorities should apply the following

principle:

- *"development whose primary objective is to conserve or enhance 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*

Environment Act (2021)

The Environment Act sets a target of halting the decline in species through the inclusion of a legally binding 2030 species abundance target. Aiming to restore natural habitats and enhance biodiversity, the Act requires new developments to improve or create habitats for nature (through mechanisms such as mandatory Biodiversity Net Gain), and tackle deforestation. Going forwards, UK businesses will need to look closely at their supply chains as amongst other measures they will be prohibited from using commodities associated with wide-scale deforestation. Woodland protection measures are also strengthened through the Act.

Local Policy

Policy ENV DM5 (Development and Biodiversity) of the Adopted Arun Local Plan from Arun District Council[8] notes that it will support development schemes which will;

"In the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site."

[8] Arun District Council (2018) Adopted Arun Local Plan 2018 – Chapter 17 Natural Environment. Available online at: https://www.arun.gov.uk/download.cfm?doc=docm93jijm4n12863.pdf&ver=13003

1.4 Methodology

This Biodiversity Impact Calculation uses the Statutory Biodiversity Metric calculation tool published by Natural England[9]. This is used to calculate 'habitat units' and 'hedgerow units' by multiplying the area (ha) or lengths (km), 'distinctiveness' (habitat type), 'condition' (quality), and strategic significance (location in relation to the authority's local strategy) of each habitat parcel.

The calculation provides a negative value to the biodiversity units where habitat is being directly lost to development. Where habitats are enhanced or created on-site, or off-site, the calculation gives a positive value but adds risk factors that account for uncertainty – difficulty in creating new habitats and time delays while they establish; habitats that are more difficult to restore or that will take a long time to reach a set target condition will score lower and therefore make a smaller positive contribution.

Where on-site gains are equal to or larger than the losses, the project is deemed to have neutral biodiversity impact or biodiversity 'net gain' respectively.

Where on-site gains do not outweigh on-site losses and a biodiversity 'net loss' is calculated, this becomes an 'offset requirement'. Offsets can be provided by further habitat creation or enhancement in-situ or elsewhere and are assessed using the same metric to balance the predicted gains against the losses to ensure no net loss will be achieved. It follows that a biodiversity net gain can still be achieved by providing higher biodiversity gains through the offset than the net loss resulting from the development.

Note that the metric does not allow for 'trading down'; one of the key principles in measuring biodiversity net losses or gains is that habitats of high ecological importance cannot be offset by the creation of larger areas of habitats with lower value. The Statutory Biodiversity Metric calculation tool includes a 'trading down correction' that deducts the number of biodiversity units that are not accounted for through the creation of equivalent high distinctive habitats than that lost. For example, the loss of a small area of lowland meadow priority habitat (very high distinctiveness) will not be offset by a larger area of modified grassland (low distinctiveness) and will only be offset by an equivalent area of habitat of the same distinctiveness or higher.

1.5 Data Sources

This calculation uses the most up to date survey information, using botanical data gathered during the site visit on 1st April 2022 and specific condition assessments undertaken on 1st June 2022. The areas of each habitat category were measured using GIS mapping tools (QGIS). Condition assessments were made in accordance with the Statutory Biodiversity Metric condition assessments document[10] and the Statutory Biodiversity Metric: draft user guide[11]. Applying the precautionary principle, a presumption for the higher condition was used where there was any uncertainty in the condition of existing habitats.

To predict habitat/hedgerow units supported after by the site after completion of the development, the aerial

[9] Natural England (2023) *The Statutory Biodiversity Metric – Calculation Tool*. Available online at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

[10] Natural England (2023) *Statutory Biodiversity Metric Condition Assessments* Available online at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

[11] Natural England (2023). *Statutory Biodiversity Metric draft user guide*. Available online at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

imagery was overlaid by the proposed scheme layout (see Figure 2). This allowed direct losses of habitats to be measured where the built environment overlaps with pre-existing habitat, with gardens and amenity areas treated separately. The habitats that are 'created' after development are assumed to achieve the highest level of condition as appropriate; a separate landscape and enhancement plan should be produced to ensure this condition is achieved.

The Statutory Biodiversity Metric calculation tool uses a separate calculator spreadsheet for linear features. This works under the same principles as above but replaces areas of habitat with linear length of a feature. It should be noted that because linear features often have higher ecological importance, linear habitats are assigned higher distinctiveness and must be offset with other linear features. The hedgerow units generated for linear features are not equivalent or interchangeable with biodiversity calculations for areas of habitat.

1.6 Results

1.6.1 Existing Habitats Assessment

A summary of habitats and condition assessments is provided in Table 1. Full results of condition assessments for habitats which require it (using the Statutory Biodiversity Metric condition assessment document) are provided in Appendix 1.

Overall, the on-site calculated baseline is 1.45 habitat units and 0 hedgerow units.

Table 1. Existing habitat conditions for land at Toddington Lane.

Habitats		Condition Assessments
UK Habitat (UKHab) Classification System	**Reference and Habitat Description**	
Bramble scrub	h3 – dense bramble scrub along the northern, north-eastern and southern boundaries of the site.	N/A
Ruderal/ephemeral	s (17) - Ruderal vegetation which has established over the gravel and cracked hardstanding in the site. Dominated by teasel *Dipsacus fullonum*, broad-leaved dock *Rumex obtusifolius*, bristly oxtongue *Picris echioides* and other species recorded include ribwort plantain *Plantago lanceolata*, common nettle *Urtica dioica,* common hogweed *Heracleum sphondylium* and spurge *Euphorbia* sp., and Canadian fleabane *Conyza canadensis*	Moderate
Other neutral grassland	g3c - Concentrated along the north and eastern sections of the site. Of similar composition to ruderal/ephemeral vegetation but dominated by Yorkshire fog *Holcus lanatus* and common nettle with wall barley *Hordeum murinum*, false oat-grass *Arrhenatherum elatius,* doves-foot cranesbill *Geranium molle,* spear thistle *Cirsium vulgare,* red clover *Trifolium pratense*, spotted medick *Medicago arabica*, ground ivy *Glechoma hederacea*, creeping buttercup *Ranununculus repens,* white dead nettle *Lamium album*, ragwort *Jacobaea vulgaris,* common mugwort *Artemisia vulgaris*, red dead nettle *Lamium purpureum*, cleavers *Galium aparine*, dandelion *Taraxacum officinale,* white clover *Trifolium repens* and forget-me-not species *Myosotis* sp. also recorded. A dense area of common nettle and white dead nettle is located in the eastern section of the site, close to the building.	Poor

Developed land; sealed surface	u1b - areas of concrete hardstanding in centre of ruderal vegetation and forming access road	N/A
Buildings	u1b - Dilapidated industrial building	N/A
Urban tree	Semi-mature hornbeam *Carpinus betulus* tree adjacent to the southern boundary	Moderate
Built linear feature	Areas of wooden post and Heras fencing along the site boundaries	N/A

1.6.2 Habitat Losses and Gains

The proposed development scheme at this site will result in the **loss** of:

On-site

- 0.14ha of sparsley vegetated land – ruderal/ephemeral
- 0.09ha of grassland – other neutral grassland
- 0.06ha of heathland and shrub – bramble scrub
- 0.05ha of urban – developed land; sealed surface
- 0.0163ha (1 x medium) of individual trees – urban tree

Post-intervention, the following habitats will be **created**:

On-site

- 0.077ha of grassland – other neutral grassland in poor condition
- 0.178ha of urban – developed land; sealed surface
- 0.07ha of urban – vegetated garden
- 0.114ha (28 x small) of individual trees – urban tree in moderate condition
- 0.0651ha (16 x small) of individual trees – urban tree in moderate condition
- 0.01ha of urban – introduced shrub
- 0.008km of native hedgerow in moderate condition

The overall results of the calculations are presented in Table 2. Please refer to the Statutory Biodiversity Metric calculation tool supplied with this document (submitted separately) for full details of the calculation.

Table 2. Headline results of the Biodiversity Impact Calculation for the proposed development at Land at Toddington Lane.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.04
	Hedgerow units	0.03
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	[illegible]
	Hedgerow units	N/A
	Watercourse units	0.00%
Trading rules satisfied?	No - Check Trading Summaries	

Table 3. Trading summary results of the Biodiversity Impact Calculation for the proposed development at Land at Toddington Lane.

Trading Summary		
Distinctiveness Group	Trading Rule(s)	Trading Satisfied?
Very High	[illegible]	[illegible]
High	[illegible]	[illegible]
Medium	[illegible]	[illegible]
Low	[illegible]	[illegible]

Table 4. Medium distinctiveness summary table showing 0.16 habitat units deficit to be offset either through trading up or the provision of medium-distinctiveness scrub.

Medium Distinctiveness					
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Medium Distinctiveness Summary	
[illegible]	[illegible]
[illegible]	[illegible]
[illegible]	[illegible]
[illegible]	[illegible]

1.7 Conclusions

The Statutory Biodiversity Metric calculation has demonstrated that the proposed scheme will results in a likely net gain of **0.04 habitat units (+3.97%)**

The linear feature calculation for the proposed scheme results in a likely gain of **0.03 hedgerow units.**

The current scheme does not satisfy the trading rules within the Statutory Biodiversity Metric. The calculation has identified a 'Medium Distinctiveness Broad Habitat Deficit' of 0.31 Habitat Units.

In order to satisfy the trading requirements, the scheme would require off-setting through the creation of medium distinctiveness (or high or very high distinctiveness) habitat off-site. If the client wishes to create these units themselves and not use a land/habitat bank, requirements of this off-site offsetting as follows:

- the off-site area must be located within the same local planning authority, natural character area or be deemed to be 'sufficiently local' as/to the development site;
- the off-site area baseline could consist of 0.24ha of scrub and 0.07ha of other neutral grassland, which would then be enhanced to 0.04ha of mixed scrub in moderate condition;
- the off-site area must be protected from future development/change of use for a minimum of 30 years and managed appropriately under a Habitat Management and Monitoring Plan to achieve the required condition.

This is one possible scenario, and the actual unit uplift would depend upon the baseline habitats within the off-site area and its' location. With the above measures in place, the scheme would satisfy the trading rules and see and overall net gain of 1.44 Habitat units and increase of 139.42%.

Should you need any further advice on the information provided above, please do not hesitate to contact The Ecology Co-op.

APPENDIX 1 – Baseline Habitat Condition Assessment Sheets

CONDITION ASSESSMENT SHEET FOR USE WITH STATUTORY BIODIVERSITY METRIC (SBM)-AREA BASED HABITATS

Date	**01/06/2022**	SBM survey reference (if condition assessment of this polygon relates to a wider habitat survey)	**g3c**
Weather conditions	**16°C, BF2-3. 90%cc, dry**		
Surveyor name(s)	**Rozel Hopkins**	Unique polygon reference(s)	
Project / development name	**Land at Toddington Lane**	SBM habitat type	**Other neutral grassland**
Onsite or offsite?	**Onsite**	Condition sheet used	**Grassland medium, high and very high distinctiveness**

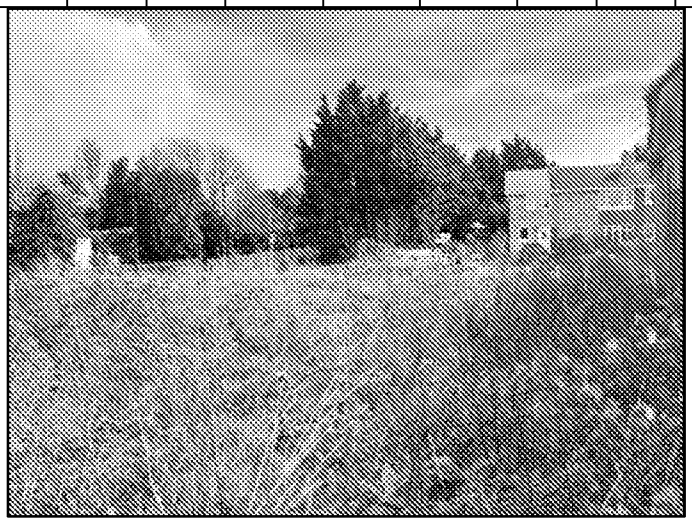
Habitat description

Concentrated along the north and eastern sections of the site. Of similar composition to ruderal/ephemeral vegetation but dominated by Yorkshire fog *Holcus lanatus* and common nettle with wall barley *Hordeum murinum*, false oat-grass *Arrhenatherum elatius,* doves-foot cranesbill *Geranium molle,* spear thistle *Cirsium vulgare,* red clover *Trifolium pratense*, spotted medick *Medicago arabica*, ground ivy *Glechoma hederacea*, creeping buttercup *Ranununculus repens,* white dead nettle *Lamium album*, ragwort *Jacobaea vulgaris,* common mugwort *Artemisia vulgaris*, red dead nettle *Lamium purpureum*, cleavers *Galium aparine*, dandelion *Taraxacum officinale,* white clover *Trifolium repens* and forget-me-not species *Myosotis* sp. also recorded. A dense area of common nettle and white dead nettle is located in the eastern section of the site, close to the building.

Allocate pass 'P' or fail 'F'. Allocate 'NA' to any irrelevant criteria numbers where condition sheet contains fewer than 13 criteria.
For Woodland & Intertidal condition sheets, allocate scores of '1' '2' or '3' against each criteria assessed.

Criterion	C1	C2	C3	C4	C5	C6								TOTAL
Result	**F**	**P**	**F**	**P**	**F**	**F**								**2/6**

Photo ref



Are any criteria non-negotiable? (Y/N) If Yes are they passed?	**Y – passed 6 but not 1**	Condition (Good/Moderate/Poor)	**Poor**

CONDITION ASSESSMENT SHEET FOR USE WITH STATUTORY BIODIVERSITY METRIC (SBM)- AREA BASED HABITATS			
Date	**01/06/2022**	SBM survey reference (if condition assessment of this polygon relates to a wider habitat survey)	**s (17)**
Weather conditions	**16°C, BF2-3. 90%cc, dry**		
Surveyor name(s)	**Rozel Hopkins**	Unique polygon reference(s)	
Project / development name	**Land at Toddington Lane**	SBM habitat type	**Ruderal/ephemeral**
Onsite or offsite?	**Onsite**	Condition sheet used	**Urban**

Habitat description

Ruderal vegetation which has established over the gravel and cracked hardstanding in the site. Dominated by teasel *Dipsacus fullonum*, broad-leaved dock *Rumex obtusifolius*, bristly oxtongue *Picris echioides* and other species recorded include ribwort plantain *Plantago lanceolata*, common nettle *Urtica dioica,* common hogweed *Heracleum sphondylium* and spurge *Euphorbia* sp., and Canadian fleabane *Conyza canadensis*.

Allocate pass 'P' or fail 'F'. Allocate 'NA' to any irrelevant criteria numbers where condition sheet contains fewer than 13 criteria.

For Woodland & Intertidal condition sheets, allocate scores of '1' '2' or '3' against each criteria assessed.

Criterion	C1	C2	C3											TOTAL
Result	F	P	F											1/3

Photo ref

Are any criteria non-negotiable? (Y/N) If Yes are they passed?	**Y – failed**	Condition (Good/Moderate/Poor)	**Poor**

CONDITION ASSESSMENT SHEET FOR USE WITH STATUTORY BIODIVERSITY METRIC (SBM)- AREA BASED HABITATS

Date	**01/06/2022**	SBM survey reference (if condition assessment of this polygon relates to a wider habitat survey)	**Urban tree - hornbeam**
Weather conditions	**16°C, BF2-3. 90%cc, dry**		
Surveyor name(s)	**Rozel Hopkins**	Unique polygon reference(s)	
Project / development name	**Land at Toddington Lane**	SBM habitat type	**Urban tree**
Onsite or offsite?	**Onsite**	Condition sheet used	**Individual trees**

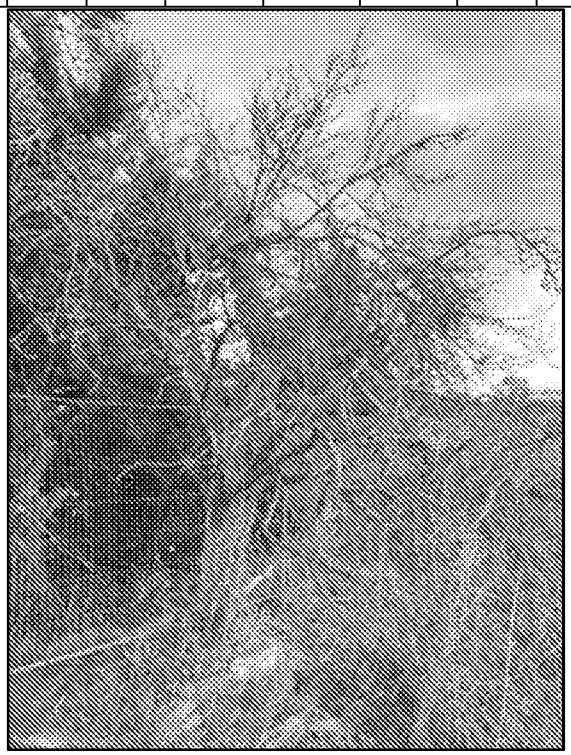
Habitat description

Semi-mature hornbeam *Carpinus betulus* tree adjacent to the southern boundary

Allocate pass 'P' or fail 'F'. Allocate 'NA' to any irrelevant criteria numbers where condition sheet contains fewer than 13 criteria.
For Woodland & Intertidal condition sheets, allocate scores of '1' '2' or '3' against each criteria assessed.

Criterion	C1	C2	C3	C4	C5	C6								TOTAL
Result	**P**	**P**	**F**	**F**	**P**	**P**								**4/6**

Photo ref



Are any criteria non-negotiable? (Y/N) If Yes are they passed?	N	Condition (Good/Moderate/Poor)	**Moderate**