Ecological Constraints & Biodiversity Net Gain Assessment (BNG)

Land to Rear of Station Approach

East Grinstead

September 2024

DEEPDENE ECOLOGY

Client	Paul Carter on behalf of B+C Architecture
Site	Land to the Rear of 18-26 Railway Approach, East Grinstead, Surrey, RH19 1BP (the 'Site')
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Data within this report is valid for a maximum of 18 months from the date of the survey. After this period, an updated site visit will be required to determine a new ecological baseline. More up-to-date survey data may be required for a planning application or licensing, depending on conditions and impacts.

Whilst every effort has been taken to ensure the accuracy of this report and its contents, in view of potential ecological constraints to development or the likely presence or absence of species, it must only be viewed as a snap-shot in time and, therefore, not be viewed as definitive. Due to external factors, such as seasonality, weather etc, having the potential to affect survey results, no liability can be assumed for omissions or changes that may, or may not occur, after the date this report was produced.

SITE

- An outbuilding, behind a parade of shops, on Station Approach which is reached by an existing access track.

PROPOSAL

- Development proposals include extensions to the existing outbuilding.

STUDIES COMPLETED

- Ecological Constraints Assessment (desk study and walkover survey) in August 2024.
- Biodiversity Net Gain Assessment using the Statutory Metric.

KEY FINDINGS

- The Site was comprised of the existing outbuilding and associated hardstanding, a hardstanding access road and ruderal/ephemeral habitat that had developed between the outbuilding and the access track.
- From the walkover survey and desk study assessment, the Site was of low biodiversity value dominated by artificial habitats (developed land; sealed surfaces) and common and widespread habitats typically found in urban areas (ruderal/ephemeral vegetation).
- Japanese knotweed, a legally controlled Schedule 9 weed species, was recorded within the ruderal/ephemeral habitat and a management plan for its removal prior to the redevelopment, will be required.
- The Site has the potential to support foraging and commuting bats, nesting birds and hedgehogs and badgers.
- Precautionary mitigation measures have been recommended for minimising potential impacts on protected/notable species during works.
- No irreplaceable habitat or priority habitat will be directly impacted by the proposals.
- No statutory or non-statutory designations apply to the Site. There are also no anticipated impacts on any sites nearby.
- The baseline habitat units within the Site before development total 0.01 habitat units within the Site.
- Post-development, within the Site, there will be a total of 0.00 habitat units. This provides a loss of 0.01 units overall, which equates to -100% habitat units.
- It is recommended that planting is undertaken on-Site to achieve at least 10% BNG. This could be achieved through planting two small trees, which would give a 89.08% increase in habitat units. Where on-Site provision is not possible, off-site provision will be required.
- Enhancement ideas have been suggested which could be incorporated into the design proposals.

OVERALL FINDING

- The areas of impact within the Site were comprised of low value habitat that is common and widespread.
- Mitigation measures have been recommended to ensure the proposals will minimise any potential impacts on protected/notable species.

- Based on the current layout, with the development proposed, it does not meet the requirement of a +10% increase in area based biodiversity units. In addition, all the trading rules for habitat units cannot be satisfied.
- Enhancement ideas could be incorporated into the design proposals.

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1 INTRODUCTION

1.1 Project background

Deepdene Ecology Ltd was instructed Paul Carter on behalf of B+C Architecture, to undertake an ecological constraints survey and Biodiversity Net Gain (BNG) assessment in support of a planning application at 'Land to the Rear of 18-26 Railway Approach, East Grinstead, Surrey, RH19 1BP' (from hereon in referred to as the 'Site'). It is proposed for an extension to be constructed on the existing outbuilding.

An ecological constraints assessment, including a Preliminary Bat Roost Assessment (PRA) was undertaken by Deepdene Ecology in August 2024. The findings of which are detailed in this report and that has helped to inform this assessment.

1.2 Report objectives

This report details the current habitats present on the Site and their condition, where appropriate, to allow an assessment of the pre-development biodiversity units using the Natural England Statutory Biodiversity Metric. This report has been produced to provide Mid Sussex Council with sufficient information to determine whether the proposals can meet the requirements of on-Site BNG.

In addition, the report provides an overview of any potential ecological constraints to the proposed project, with a focus on protected/notable species and habitats.

1.3 Site setting

The Site (TQ 39216 38196) comprises an existing single storey outbuilding with associated access track, off Station Approach, along with an area of ruderal/scrub habitat around the building due to very little recent management. (see **Figures 1** & **2**). The Site is bound by residential houses, shops and roads, and set within an area of residential houses and commercial properties in the centre of East Grinstead. There is limited green infrastructure present in the immediate area, although parks and the vegetated railway line are present in the wider area.

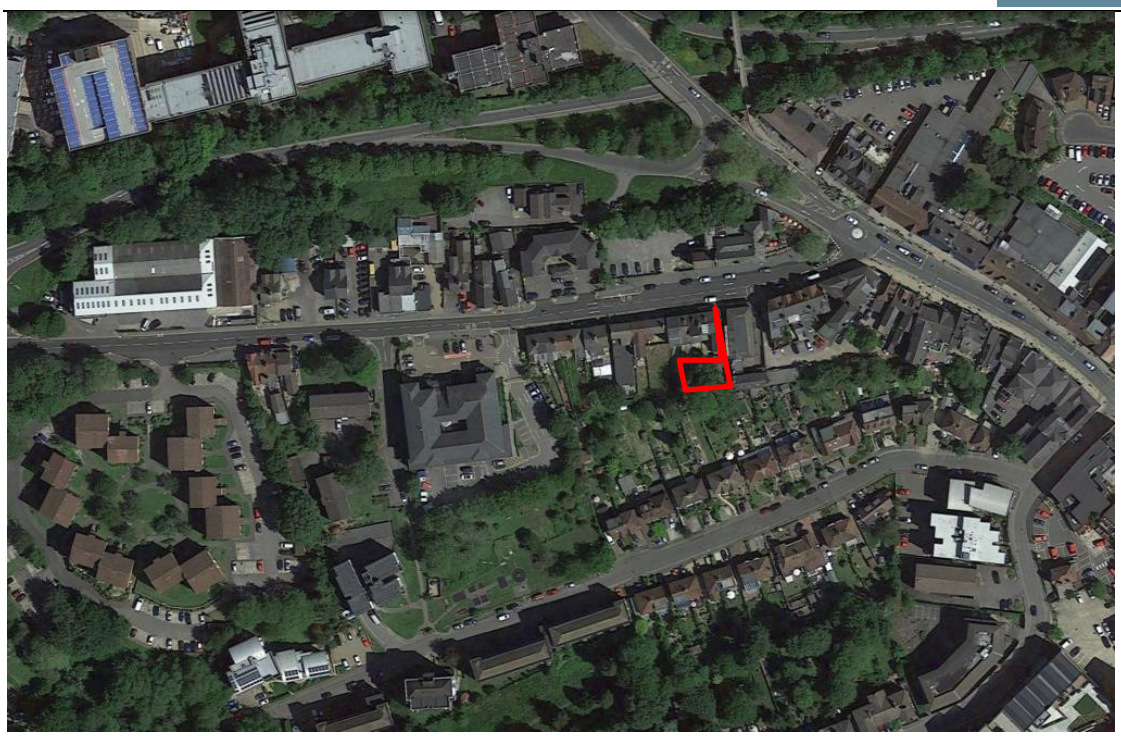

Figure 1: Site boundary (indicative only). Image taken from Google Earth.

Figure 2: Site boundary (indicative only). Image taken from Google Earth.

1.4 Proposed development

A planning application will be submitted for the construction of single storey extension on the existing outbuilding.

A full set of drawings will be provided with the planning application with the block plans provided in **Appendix D**.

1.5 Biodiversity Net Gain: Overview

The requirement for BNG is set out within legislation (The Environment Act 2021) and the National Planning Policy Framework (NPPF) 2021. Both require that planning applications for new developments will need to demonstrate a 10% BNG and the Government 25-year Environment Plan states that government will "*embed environmental net gain principle for development*".

Biodiversity Net Gain is the end result of a process which is designed to ensure that there is an increase in biodiversity when the value of habitats prior to and post-development are considered. The assessment calculates the change in ecological value at a Site by comparing the number of habitat units within the Site pre- and post-construction for both linear habitats such as hedgerows and area based habitats such as grassland. The ecological value of the Site is expressed as a percentage change in units following the proposed development. This is an indicator of the proposed development's impact on the Site's existing ecological value and establishes if there will be net gain, net loss or no net loss of biodiversity following the completion of the development and any subsequent management regime.

The process of BNG is designed to align with the mitigation hierarchy to ensure that firstly loss is avoided, secondly, loss is minimised and thirdly lost habitats are restored or mitigated for on-Site. Where this is not possible, and as a last resort, remaining losses must be compensated for off-Site.

1.6 Scope of the report

In order to inform the assessment, an ecological constraints assessment was undertaken which presents ecological information obtained during a desk study and walkover survey undertaken in August 2024.

The walkover survey included a brief assessment of the potential of the habitats within the Site to support any relevant protected or notable species, to ensure that no valuable habitats/protected species would be adversely affected by the proposed development.

The purpose of the appraisal is to satisfy the requirements of the National Planning Policy Framework (NPPF) by identifying the potential impacts of the proposed development on protected species and features of ecological value.

This report identifies the need for any measures to avoid or mitigate damage and disturbance to species, and provides recommendations for further ecological surveys, as required.

This report aims to describe the ecological baseline of the Site and the biodiversity changes that will be introduced by the proposed development.

The methods, results and recommendations of the BNG assessment are detailed, the scope of which is:

- Assess the ecological baseline of the Site by identifying the habitat types and features of potential ecological value including the potential presence of protected species.
- To establish the total number of area-based habitat units and linear hedgerow units (if present) within the Site.
- To establish the total number of units which will be retained, reinstated or created under the proposed landscape mitigation plan.
- To determine whether the proposed development will result in a net loss, no net loss or a net gain for biodiversity, with a focus on Habitats of Principal Importance (HPI).
- If necessary, and depending on the outcome of the above calculations, biodiversity improvements will be proposed, in order to achieve an overall net gain of at least 10% and adhere to the BNG trading rules on habitat distinctiveness and condition.

2 LEGISLATION AND POLICY

There is a framework of national and local legislation along with planning policy guidance that exists to protect and conserve wildlife and habitats. The following core legislation exists to protect habitats and species of nature conservation importance:

- Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019;
- Wildlife and Countryside Act 1981 (as amended) (WCA);
- Natural Environment and Rural Communities (NERC) Act 2006;
- The Countryside and Rights of Way Act 2000;
- The Hedgerow Regulations 1997; and
- Protection of Badgers Act 1992.

The following national planning policies are relevant to assessing the impacts of development on nature conservation:

- National Planning Policy Framework (NPPF)4 (MHCLG, 2021);
- ODPM Circular 06/2005 (Defra Circular 01/2005)5; and
- Mid Sussex District Local Plan (2018).

Further details of the legislation and policy can be found in **Appendix C**.

3 METHODOLOGY

3.1 Desk study and walkover survey: Baseline

The baseline ecology of the Site was assessed using the following sources of information:

- Publicly available Open Source Natural England datasets for HPI, ancient woodland (classed as irreplaceable habitat), and statutory designated sites for nature conservation within 2km.
- Mid-Sussex District Council Planning Map[1] - to identify non-statutory designated sites (Sites of Nature Conservation Importance (SNCI) and potential (p)SNCIs) within 1km.
- Development proposals through assessing the Layout Plan (**Appendix D**) – B+C Architecture.

A walkover survey of the Site was undertaken on 6th August 2024 by Deepdene Ecology which informed the existing habitats on Site and assessed the potential for notable fauna to occur in or adjacent to the Site. The walkover was undertaken in line with the JNCC and CIEEM guidelines. The survey results confirmed the UKHab types. UKHab supersedes previous systems such as Phase 1 Habitat Survey, allowing for direct interpretation of baseline habitat survey data into HPI and Annex I Habitat[2] types.

In particular, the survey also assessed the suitability/potential of the habitat to support: amphibians, badgers, bats (roosting, foraging/commuting), dormice, hedgehogs, nesting birds, reptiles and invertebrates.

All habitat types were mapped (**Appendix A**). A fine scale Minimum Mapping Unit (MMU) was deemed an appropriate level for mapping habitats i.e. a habitat area was only mapped if the habitat was greater than $25m^2$ or 5m in length.

Each habitat was assigned a Primary Code of the Professional Edition of the UKHab Field Key[3] at a minimum of the Level 3 hierarchy, using the UKHab Habitat Definitions[4] for reference. Secondary Codes (SC) were then applied to provide additional context to the habitats, with no more than three SC being assigned.

3.1.1 Surveyor

The survey and assessment were undertaken by Nadine Clark MSc BSc MCIEEM. Nadine has over 17 years' experience undertaking ecological surveys and is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). She holds survey licences for bats (Level 2 CL18 Licence: 2015-14593-CLS-CLS), great crested newts (Licence CL08: 2016-20221-CLS-CLS) and dormice (Licence CL10a: 2023-20767-CLS-CLS).

3.2 Biodiversity Net Gain Assessment and Evaluation

The Site has been assessed using Natural England's Statutory Biodiversity Metric with the User Guide and technical supplements[5].

[1] Mid Sussex Planning Policy Maps - https://www.midsussex.gov.uk/planning-building/policies-maps/ (accessed September 2024)
[2] Habitats listed in Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora.
[3] Carey. P., Butcher. B. (2018) *UK Habitat Classification Field Key*.
[4] UK Habitat Classification Working Group (2018). *UK Habitat Classification Definitions V1.0* at https://ukhab.org/ukhab- documentation/
[5] Defra, 2024. *The Statutory Biodiversity Metric User Guide*. Published February 2024.

With the Metric, the habitats on Site are converted into 'biodiversity units' which are calculated using the size of the habitat parcels and their quality. The metric uses area (hectares) as its core measurement except for linear habitats (hedgerows, lines of trees, rivers and streams) where habitat length (kilometres) is used.

In order to assess the quality of a habitat, the metric scores the following:

a) Distinctiveness: how common/rare the habitat is, with scarce or declining habitats scoring higher than common and widespread types.
b) Condition: the biodiversity value of a habitat relative to others of the same type.
c) Strategic significance: habitats that are linked or joined to other key areas are considered more important than isolated habitat islands.

For habitats, the Statutory Metric provides a distinctiveness score automatically and for some habitats a condition assessment score is required to be chosen by the User. The Biodiversity Metric Condition Sheets in Excel format were used to assess each habitat type requiring a condition assessment against the appropriate condition to determine whether the habitat was of a poor, moderate or good condition.

There are three options for strategic significance which must be chosen and these are:

1) Area/compensation not in local strategy/ no local strategy;
2) Location ecologically desirable but not in local strategy; and
3) Formally identified in local strategy.

In order to determine the baseline units, a separate score is calculated for the area habitat units, linear river/stream units and the linear hedgerow/line of trees units. The three distinct unit types are unique and cannot be merged/traded or converted. Any gains or losses for each of the three scores must be reported separately.

The strategic significance of the assessment was determined by reviewing the Local Planning documents and using MAGIC (Natural England 2024) to identify any strategic policy relating to the Site, habitats on-Site or nearby.

The findings of the desk study and field surveys have been used to identify habitats and potentially significant ecological features at the Site currently. This information was then digitised and the resulting information was fed into the Statutory Biodiversity Metric.

3.2.1 Urban & Rural Trees

Scattered trees in a rural setting are classed as 'rural trees' for the purposes of BNG and 'urban trees' in a more urban situation. When trees are recorded within a Site, the area of habitat that falls within the Root Protection Area (RPA) is recorded as its corresponding habitat type e.g. the modified grassland beneath a canopy, along with the RPA of the tree which is recorded in the individual tree category.

The area calculations for the scattered trees on the Site, for the purposes of the current BNG assessment, have been based on the Tree Helper.

3.2.2 Limitations and Assumptions

UKHab Classification surveys can be undertaken at any time of year, with the optimal season being between March and September when most plant species are visible. Field surveys usually fail to record all species present for various reasons, including the seasonal absence of some species, and short survey duration. Rare or cryptic species are often missed in short surveys. However, based on the fact that the broad habitat types found were common and widespread, it is not considered likely that the surveys missed any valuable species.

3.2.3 Post-development Limitations and Assumptions

It is assumed that all habitats to be lost can be reinstated in their current position and can be subject to suitable management to achieve a condition identical to that which was achieved pre-development.

All habitat management must be secured for a minimum period of 30 years.

4 DESK STUDY & WALKOVER SURVEY FINDINGS: ECOLOGICAL BASELINE

4.1 Designated Sites of Nature Conservation Importance and valuable habitats

There are no statutory designated sites within 2km of the Site. There are internationally designated sites within 5km of the proposals. These are described in more detail in **Table 1** below.

Table 1: Statutory designated sites within 2km of the Site and internationally designated sites within 5km.

Site Name	Distance & direction	Description
Ashdown Forest Special Area of Conservation (SAC)	4.6km south	Primarily designated for the two Annex I habitats present- Northern Atlantic wet heaths with *Erica tetralix* and European Dry Heaths. Great crested newt is a qualifying feature, but not a primary reason for site selection.
Ashdown Forest Special Protection Area (SPA)	4.6km south	Designated for its breeding population of Dartford warbler, woodlark and nightjar.

The Site falls within the 7km Zone of Influence for Ashdown Forest SPA and SAC. However, the application is very small scale and there is no proposed increase in residential units as a result of the proposals. It is therefore unlikely to result in any negative impact on the SPA & SAC. Whilst the Site falls within a SSSI Impact Zone, the application is not of a scale or type that requires further consultation Natural England.

There is one locally designated Site of Nature Conservation Interest (SNCI) within 1km of the Site which is described in more detail below in **Table 2**.

Table 2: Non-statutory designated sites within 1km of the Site.

Site Name	Distance & direction	Description
Worth Way SNCI	0.6km west	Disused railway line with woodland habitats.

There are small pockets of Priority Deciduous Woodland (Section 41 NERC Act habitats of principal importance) and Ancient Woodland in all directions in the wider landscape. The closest priority woodland is approximately 350m southwest of the Site and the closest ancient woodland, is approximately 800m to the west.

There are no anticipated impacts on statutory or non-statutory designated sites or woodland habitats due to their distance from the Site and the small scale of the proposed works, assuming that standard pollution prevention measures are implemented at all times. Therefore, they will not be considered any further in this assessment.

4.2 Walkover survey findings

4.2.1 Habitats

The habitats found within the Site were all common and widespread. Buildings and hardstanding were recorded with an additional area of ruderal habitat where the hardstanding had become overgrown with vegetation. Japanese knotweed *Reynoutria japonica* was recorded within the ruderal habitat. This species is listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and legally controlled.

Photographs from the survey are provided in **Appendix E** and further detail on the habitats is provided in **Section 6**.

4.2.2 Protected/notable species

Badgers: The Site and buffer zones, where access was possible, were searched for evidence of badgers. No badger setts and no badger signs were observed during the walkover survey. The Site in an urban location with limited suitable habitat in the immediate area. Mitigation has been recommended in **Section 5** below to minimise potential impacts.

Bats: The existing outbuilding will be retained, although there will be single storey extension on the eastern elevation and changes to the roof structure. The building was a corrugated metal sheet construction with corrugated metal sheet roof and half sheet metal and half brick walls. It had glazed windows which had no gaps around the edges, and the roof and walls did not create any gaps underneath, partly due to the single skin nature of the construction. The building had no enclosed roof space and the windows provided a well-lit interior. The building was assessed as having negligible suitability for roosting bats. No further surveys in relation to roosting bats were therefore required.

There are no trees present on Site and the habitat within the Site was of low value to foraging and commuting bats. Precautionary mitigation for potential lighting impacts has however been outlined in relation to foraging and commuting bats.

Hedgehogs: The Site has low potential to support foraging/commuting hedgehogs and the Site is accessible to the wider area. Precautionary mitigation has been outlined.

Nesting birds: The vegetation and building within the Site has the potential to support low numbers of common and widespread species of nesting birds. Common species of bird were noted within the Site during the walkover survey. The proposals will include clearance of the ruderal habitat on Site and as such, precautionary mitigation measures have been provided.

Reptiles and amphibians: The habitats on Site were suboptimal for common reptiles and amphibians with very limited cover or vegetation suitable for foraging and poorly connected to other high quality suitable habitat. There are also no waterbodies on-Site or within 250m of the Site. No further surveys or mitigation are required in relation to amphibians and reptiles.

5 RECOMMENDATIONS FOR MITIGATION DURING THE WORKS

A summary of the recommended mitigation for minimising any potential impacts on ecological features during the works is provided in **Table 3** below.

Table 3: Recommendations for mitigation

Receptor	Recommended mitigation
Sites and habitats	
Designated Sites of Nature Conservation Interest	• No mitigation is required other than standard pollution prevention measures to prevent any run off or dust.
Habitats - General	• Minimise impacts on natural habitats wherever possible. This can be achieved through, for example, minimising vegetation clearance required, ensuring that the volumes of material required is calculated to minimise any necessary stockpiles, ensuring that any temporary stockpiles for materials required are placed on geotextile matting to minimise impacts etc. However, given the small area of the Site, the potential to retain habitat on Site is minimal • All mature trees close to the working area should be protected through the use of root protection zones following best practice guidelines (i.e. BS5837:2012 Trees in Relation to design, demolition and construction – Recommendations).
Non-native Invasive Species	• Japanese knotweed was found within the Site. This species is listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and legally controlled. • The plant can spread through rhizome fragments or cut stems from as little as 0.7g of material. Freshly cut shoots from stems can also produce new viable plants. Rhizome material can remain viable within the soil for as long as 20 years in the right conditions.

	• The rhizomes typically can extend up to 7m from the base of the plant and therefore it is essential that good Site hygiene is adopted within 7m of any knotweed stands.
	• The main control methods are through:
	  • Spraying with an approved herbicide;
	  • Stem injection;
	  • Burying it on-Site to a depth of 5 metres (if not sealed with a geotextile membrane).
	• If it is not possible to manage the knotweed on Site, it must be removed through the use of a registered waste carrier and to a licensed landfill site or incineration facility.
	• It will be necessary to produce a Japanese Knotweed Management Plan which would detail appropriate management of the plant and the methods to be implemented on-Site to eradicate the plant over a period of at least five years .
	• Further advice on appropriate eradication techniques are provided on the Government website https://www.gov.uk/guidance/prevent-japanese-knotweed-from-spreading.

Protected/notable species	
Badgers and hedgehogs	• All contractors and site personnel should be briefed on the potential presence of badgers (and other mammals) and will remain vigilant for any signs of badger activity. • Any trenches or deep pits that are left open overnight should be provided with a means of escape should a badger (or any other mammal) fall in. This could simply be in the form of a roughened plank of wood placed in the trench as a ramp to the surface. • The trenches/pits should be inspected each morning by a nominated member of staff to ensure that no badgers (or other mammals) have become trapped overnight. Should a badger become trapped an ecologist should be contacted immediately for further advice. • No topsoil or other soft materials should be stored on Site to minimise the risk of badgers creating setts within it. • There should be no storage of any chemicals or fires on Site.

Bats: foraging and commuting	• No night-time working or operational lighting ideally.
	• If required, the Bat Conservation Trust guidance 'Bats and artificial lighting at Night' (2023) should be followed. This includes:
	  • Avoid artificial lighting close to any mature trees, hedgerows or woodland within the Site or close to the boundary;
	  • Directing any task lighting used during construction away from vegetation;
	  • White and blue wavelengths of the light spectrum should be avoided and the brightness should be kept as low as feasibly possible;
	  • All luminaires should lack UV elements and metal halide fluorescent sources should not be used;

	• LED luminaires are preferred due to the lower intensity, sharp 'cut-off', colour rendition and dimming capability; • A warm white light source (2700Kelvin or lower) should be adopted to reduce the blue light component; • Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be used; • Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt; • Any necessary security lighting should be set on short timers (e.g. 1 minute) with a sensitivity to large moving objects only; • Lighting times will be limited to provide dark periods; and • The height of columns will be carefully considered to avoid light spill.
Nesting Birds	• It is recommended that vegetation clearance/demolition is undertaken outside the bird nesting season, which is generally accepted to extend from late February-August inclusive (although dates vary by species and are subject to prevailing weather conditions). • If this is not possible, and vegetation clearance/demolition is required during the bird nesting season, the following measures will be implemented: • The area to be removed should be inspected for evidence of nesting activity by a suitably experienced ecologist no more than 24 hours in advance of clearance. • If this identifies any nesting activity the feature should be left undisturbed with an appropriate exclusion zone until the end of the nesting season or until the birds have fledged and it is confirmed that the nest is no longer in use. • All resultant brash should be immediately moved away from the working area.

6 BIODIVERSITY NET GAIN ASSESSMENT

This section discusses the habitat values on the existing Site at the baseline and post-development. The habitats have been mapped and are shown in **Appendix A** & **B**. The Biodiversity Metric calculations are provided in the accompanying document.

6.1 Strategic significance

The Site is not located within any biodiversity opportunities area (BOA) or a Nature Recovery Network and is therefore not formally of high strategic significance.

6.2 Baseline habitats and biodiversity value

The existing, baseline habitats that are present are summarised in **Table 4** and shown in the figure in **Appendix B**.

6.2.1 Existing habitats

Developed land, sealed surfaces (u1a u1b)

This habitat consisted of the existing outbuilding, access track and areas of hardstanding associated with the building. This habitat type is a very low distinctiveness habitat in terms of the biodiversity metric and does not have a condition score.

Ruderal/Ephemeral Habitat (u1 81 524)

The rest of the Site which was not occupied by buildings or hardstanding, consisted of ruderal habitat where the Site had been unmanaged and vegetation had grown up. Species such as *nettles Urtica dioca*, bramble *Rubus fruticosus*, creeping thistle *Cirsium arvense*, Japanese knotweed, mugwort *Artemisia sp.*, ash saplings *Fraxinus excelsior*, Canadian fleabane *Erigeron canadensis* and hedge bindweed *Calystegia sepium* were recorded.

This habitat type is a low distinctiveness habitat and the condition score is poor with a failure of two of the three criteria due to the lack of pollen and nectar source and value to wildlife (criteria B) and due to the presence of invasive species (criteria C).

6.2.2 Irreplaceable or priority habitats

No HPI or irreplaceable habitat were found within the Site boundary.

6.3 Post-development biodiversity value

The post-development habitats expected on Site after construction are based on the Site Plan (see **Appendix D**). The habitats drawing (see **Appendix B**) illustrates the habitats proposed across the Site and these are described in more detail below with calculations in **Table 4**.

The proposals are for the construction of an extension following clearance of the ruderal/ephemeral vegetation.

6.3.1 Lost habitats

The project will result in the overall loss of 0.006ha of ruderal/ephemeral habitat to the new extension and associated hardstanding.

6.3.2 Retained habitats

The project will result in the retention of the existing building and hardstanding (0.0162ha).

6.3.3 Enhanced habitats

It is not proposed for any of the baseline habitats within the Site to be enhanced.

6.3.4 Created habitats

Developed land; sealed surfaces

A total of 0.006ha extra of developed land; sealed surfaces will be created where the existing overgrown ruderal habitat will be lost. This is the footprint of the new extension and the associated hardstanding.

This habitat is a very low distinctiveness habitat in terms of the biodiversity metric and does not have a condition score.

Table 4 Baseline and proposed habitats, along with the associated condition assessment and also a summary of how this assessment was derived.

Habitats							
	Existing		Proposed				
Habitat	**Baseline area (ha)/units**	**Assessment/Comments**	**Lost area/units**	**Retained area/units**	**Enhanced area/units**	**Created area/units**	**Assessment/comments**
Developed land, sealed surfaces (u1b5 & u1b6)	0.0162ha 0.00 units	The existing outbuilding and associated hardstanding along with the existing access track. This is assigned a very low distinctiveness and no condition assessment is required.	N/A	0.0162ha 0.00 units	N/A	0.006ha 0.00 units	The existing outbuilding will be retained along with the access road. The new building extensions and hardstanding increase the overall area on-Site. This is assigned a very low distinctiveness and no condition assessment is required.
Ruderal/ Ephemeral (u1 81 524)	0.006ha 0.01 units	The area of the Site between the existing outbuilding and the access road which has become encroached with ruderal species. This is assigned a low distinctiveness and was assigned a poor condition due to the lack of species	0.006ha 0.01 units	N/A	N/A	N/A	The whole area of the ruderal habitat will be lost as a result of the proposals with no new ruderal habitat being proposed.

		of wildlife value and the presence of invasive Japanese knotweed causing it to fail two of the three criteria.					
Totals	**0.02ha** **0.01 units**		**0.006ha** **0.01 units**	**0.0162ha** **0.00 units**	**N/A**	**0.006ha** **0.00 units**	

6.4 Summary of habitat units

A summary of the habitat units post- development is provided in **Table 5**. This considers the habitats that will be lost during construction and any habitats that will be created in the long-term. The net change in units is used in the BNG calculations.

Table 5: Habitats present post-development

	Habitat units
Biodiversity units (baseline)	**0.01**
Units lost	(-) 0.01
Units retained	0.00
Units enhanced	0.00
Units created	0.00
Biodiversity units (post-development)	**0.01**
Net change (on-Site)	**-0.01 units (-100%)**

6.5 Biodiversity Net Gain Conclusions

Following this assessment of the Site and the calculation of biodiversity units, the biodiversity balance between the baseline and the post intervention situation has been calculated using the Statutory Metric. The key worksheets of the Calculation Tool are provided as a separate document.

The total change in habitat units has been calculated to be -0.01 units. This delivers a total net % change of -100% in habitat units. In addition, the trading rules have not been met since the loss of the low distinctiveness habitat (ruderal/ephemeral) has not been compensated using the same broad habitat type or a different broad habitat type of medium distinctiveness.

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Headline Results

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On-site baseline	Habitat units	0.01	
	Hedgerow units	0.00	
	Intercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00	
	Hedgerow units	0.00	
	Intercourse units	0.00	
On-site net change (units & percentage)	Habitat units	-0.01	-100.00%
	Hedgerow units	0.00	0.00%
	Intercourse units	0.00	0.00%
Off-site baseline	Habitat units	0.00	
	Hedgerow units	0.00	
	Intercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00	
	Hedgerow units	0.00	
	Intercourse units	0.00	
Off-site net change (units & percentage)	Habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Intercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.01	
	Hedgerow units	0.00	
	Intercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Habitat units	0.00	
	Hedgerow units	0.00	
	Intercourse units	0.00	

On-site net gain is less than target set ▲

FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.01	
	Hedgerow units	0.00	
	Intercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-100.00%	
	Hedgerow units	0.00%	
	Intercourse units	0.00%	
Trading rules satisfied?	No - Check Trading Summaries ▲		

Total net gain achieved is less than target set ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	0.01	0.01	0.01
Hedgerow units	10.00%	0.00	0.00	0.00
Intercourse units	10.00%	0.00	0.00	0.00

= additional hedgerow units required to meet target

additional watercourse units required to meet target

Input errors/rule breaks present in metric ▲

6.6 How to achieve 10% BNG

In order to achieve the minimum of 10% BNG, it would be necessary to achieve 0.011 units (although due to only showing to two decimal places this is shown as 0.01 in the metric) and therefore there is a deficit of 0.011 units based on the current design.

It would be possible through on-site habitat gain to meet the required +10% net gain through the planting of two small trees in a poor condition which would create 0.02 units and result in a 89.08% increase in units post development.

Where it is not possible to achieve at least a 10% increase in biodiversity units on-Site, it may be possible to provide offsetting for the loss through enhancements and habitat unit gain at off-Site areas. Small sites such as this, are better placed to provide towards larger areas of habitat through off-site provision since the potential habitats that could be created on Site are very limited and the area available to achieve this, small.

Off-Site habitat creation and/or enhancement can be achieved either through the creation of habitat on an area of land owned by the client or alternatively through a third party provider such as a habitat bank. Third party providers can provide habitat units for tariffs based on the habitat units created as part of a larger habitat creation scheme. As a last resort, it is possible to use a statutory biodiversity scheme, which contribute to UK-wide habitat creation plans.

The use of land close to the Site is recommended to offset any negative impacts of the development in the immediate area. Where the off-Site habitat is further away, different multipliers may be required to offset this.

Where possible, the mitigation hierarchy should always be followed with avoidance of loss of biodiversity and habitats considered as the first option, and off-Site compensation considered only where no other options are possible.

Where off-Site habitat is created as part of BNG, this will need to be registered using Natural England's digital registry system and consideration to the protection of management of the areas for at least 30 years will need to be secured.

6.7 Long-term management

Part of the requirement of BNG is to ensure the long term management of habitats on-Site with a management plan for the implementation of measures to ensure the long term value of the habitats is maintained where there is 'significant on site gains'. This management plan is normally recommended to cover a 30 year period and the financial mechanisms to ensure the management plan is implemented will need to be considered.

7 BIODIVERSITY ENHANCEMENTS

The NPPF states that local planning authorities should aim to conserve and enhance biodiversity where possible when determining planning applications. The development plan should maximise opportunities for enhancement (see **Table 6**), in order to achieve a net increase in biodiversity. This is in accordance with the NERC Act (2006) which requires that "*every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.*"

Table 6: Recommendations for enhancements

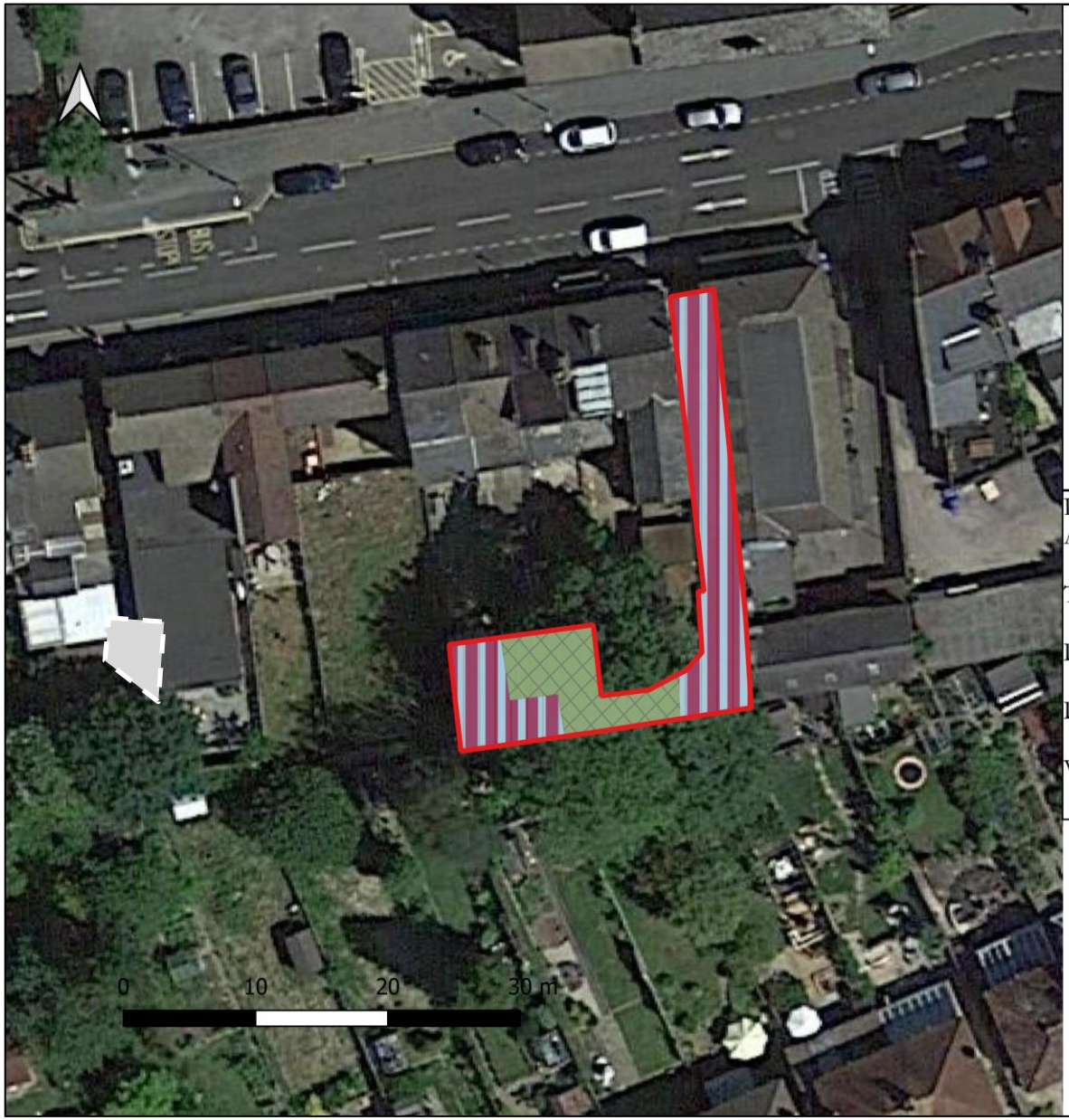
Habitats
• New tree or shrub planting should include a diverse mix of native species and a suitable list has been provided in **Appendix F**. • The removal of Japanese knotweed from the Site will have a positive impact on the biodiversity of the Site.
Bats
• At least one bat box should be installed within the new extension. • Suitable boxes include the Habibat 001 bat box or an Ibstock Enclosed Bat Box 'B'. These boxes can be fronted with brick or rendered to match the building design to ensure that the integrated boxes are unobtrusive and aesthetically pleasing. • It should be installed at least 3.5m above the ground with no restricted flight lines by buildings or trees. The box should be installed away from windows and artificial light sources.   Habibat 001 integrated bat box   Ibstock enclosed bat box

8 CONCLUSION

This report is based on an ecological desk study and a walkover survey undertaken in August 2024. Overall, the habitats within the Site were found to be common and widespread. The Site has very limited potential to support hedgehogs, nesting birds and foraging and commuting bats and badgers. No further surveys have been recommended for these species. Mitigation has been recommended to minimise potential impacts on protected/notable species.

The current proposals as outlined in the Site Plan provide a loss of 100% of habitat units. This is due to the proposed development type and the limitations of a small site such as this. On-site net gain is achievable with the planting of two small poor condition trees within the landscaping scheme . If not, measures for off-Site enhancement/creation would require consideration in order to meet the required 10% BNG.

APPENDIX A – Habitats (Existing)



Legend

Red Line Boundary

Developed land; sealed surface

Ruderal/Ephemeral

Project: Land to the Rear of 18-26 Railway Approach, East Grinstead

Title: UKHabs- Existing

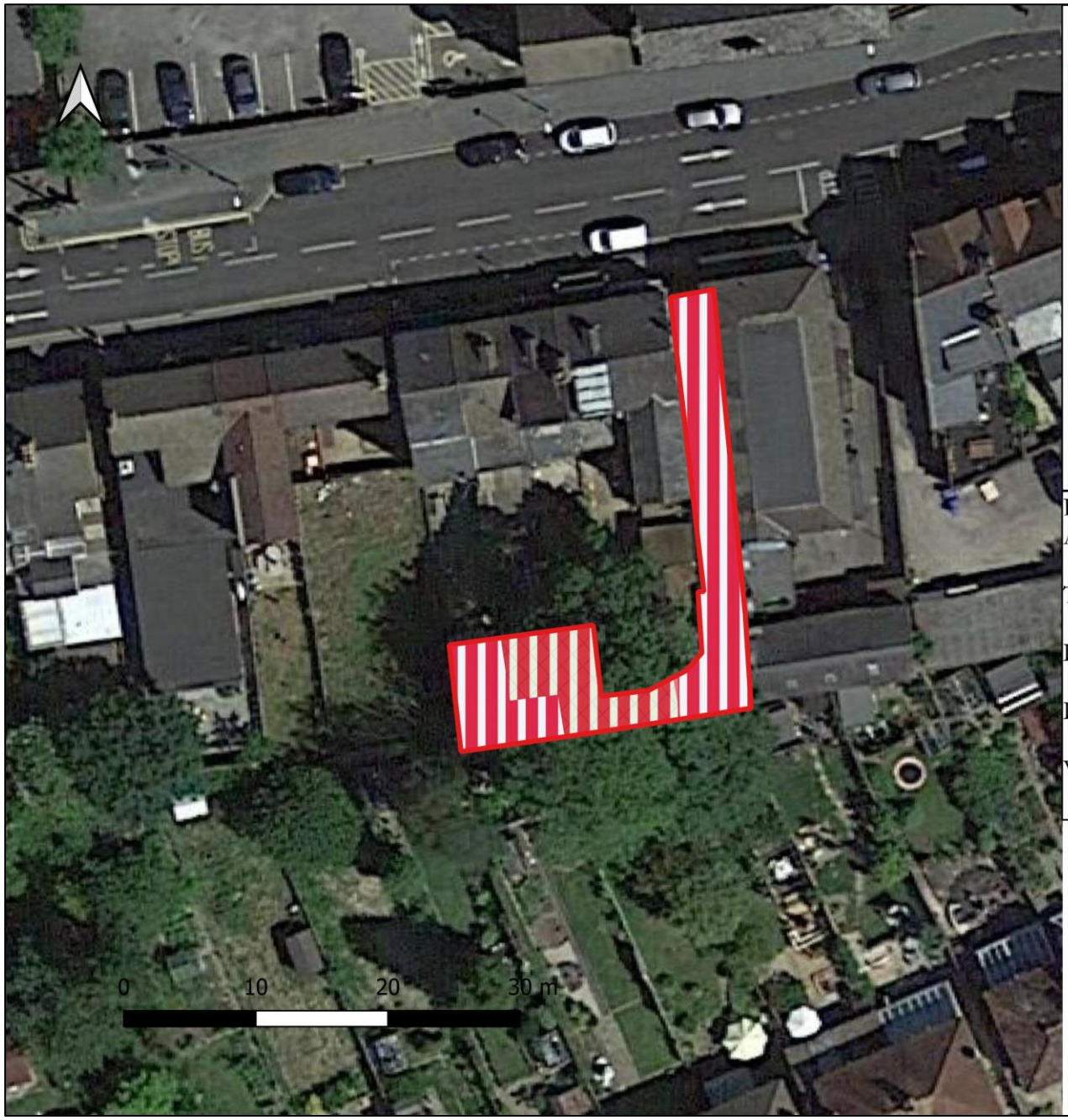
Drawing Number: 2254/001

Date: 10th September

Version: 001

DEEPDENE ECOLOGY

APPENDIX B - Habitats Post-development



Legend

Red Line Boundary

Developed land; sealed surface

Project: Land to the Rear of 18-26 Railway Approach, East Grinstead

Title: UKHabs- Proposed

Drawing Number: 2254/002

Date: 10th September

Version: 001

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APPENDIX C - Relevant Legislation and Policy

The following section summarises the relevant BNG legislation and policy. This includes the NPPF and local planning policy. As the implementation of the legislation is relatively current, the policy at the local level is currently being updated.

Environment Act 2021

The Environment Act 2021 makes a provision for BNG to be a condition of planning permission in England and planning applications need to demonstrate that a 10% BNG can be met.

National Planning Policy Framework (NPPF) July 2021

Planning policies and decisions should contribute to and enhance the natural and local environment by:

174 (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

174 (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

175 take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries;

179 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.

180 (a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

180 (c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

180 (d) 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.

Local Planning Policy

Mid Sussex District Plan 2014 – 2031

Mid Sussex District Council's planning policy in relation to biodiversity includes Policy DP12 in the district plan (Adopted 2018) which states:

DP12: Protection and enhancement of countryside

Strategic Objectives: 3) To protect valued landscapes for their visual, historical and biodiversity qualities; 11) To support and enhance the attractiveness of Mid Sussex as a visitor destination; and 15) To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations.

Evidence Base: A Landscape Character Assessment for Mid Sussex, A Strategy for the West Sussex
Landscape, Capacity of Mid Sussex District to Accommodate Development Study.
The countryside will be protected in recognition of its intrinsic character and beauty.

Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and:
 it is necessary for the purposes of agriculture; or
 it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.

Agricultural land of Grade 3a and above will be protected from non-agricultural development proposals. Where significant development of agricultural land is demonstrated to be necessary, detailed field surveys should be undertaken and proposals should seek to use areas of poorer quality land in preference to that of higher quality.

The Mid Sussex Landscape Character Assessment, the West Sussex County Council Strategy for the West Sussex Landscape, the Capacity of Mid Sussex District to Accommodate Development Study and other available landscape evidence (including that gathered to support Neighbourhood Plans) will be used to assess the impact of development proposals on the quality of rural and landscape character.

Built-up area boundaries are subject to review by Neighbourhood Plans or through a Site Allocations Development Plan Document, produced by the District Council.
Economically viable mineral reserves within the district will be safeguarded.

The District Plan also has specific planning Policy in relation to Ashdown Forest SPA and SAC in Policy DP17

DP17: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)

Strategic Objectives: 3) To protect valued landscapes for their visual, historical and biodiversity qualities.

Evidence Base: Ashdown Forest Visitor Survey Data Analysis, Habitats Regulations Assessment for the Mid Sussex District Plan, Visitor Access Patterns on Ashdown Forest. In order to prevent adverse effects on the Ashdown Forest SPA and SAC, new development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Within a 400 metres buffer zone around Ashdown Forest, mitigation measures are unlikely to be capable of protecting the integrity of the SPA and, therefore, residential development will not be permitted. Within a 7km zone of influence around the Ashdown Forest SPA, residential development leading to a net increase in dwellings will be required to contribute to mitigation through:

1) The provision of Suitable Alternative Natural Greenspace (SANG) to the minimum level of 8Ha per 1,000 net increase in population; or a financial contribution to SANGs elsewhere; or the provision of bespoke mitigation; and
2) A financial contribution to the Ashdown Forest Strategic Access Management and Monitoring (SAMM) Strategy.

Large schemes proposed adjacent or close to the boundary of the 7km zone of influence may require mitigation for the SPA. Such proposals for development will be dealt with on a case-by case basis. Where bespoke mitigation is provided, these measures will need to be in place before occupation of development and must be managed and maintained in perpetuity. The effectiveness of such 63 mitigation will need to be demonstrated prior to approval of the development. Bespoke mitigation will need to be discussed and agreed by the District Council as the competent authority following advice from Natural England.

APPENDIX D

Figure 1: Proposed block plan (B+C Architecture 2024)

site plan - scale 1:500 @ A3

APPENDIX E

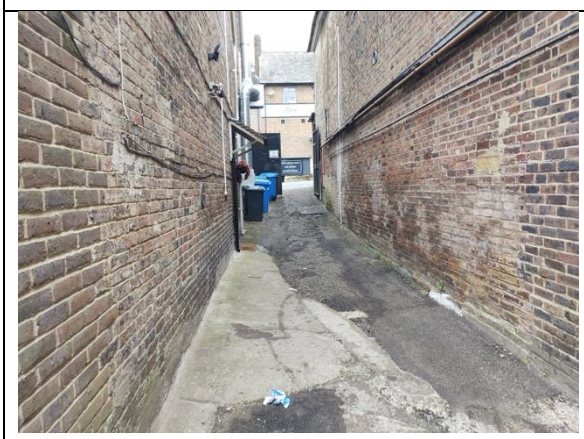
Site Survey Photographs

Photograph 1: Existing building on Site with corrugated metal roof and half brick, half corrugated metal walls.

Photograph 2: Internal view of the existing building with no internal roof void and no evidence of bats found.

Photograph 3: Japanese knotweed within the ruderal habitat on Site.

Photograph 4: Ruderal habitat present within the area around the existing outbuilding.



Photograph 5: Access track to be utilised and retained.

APPENDIX F

Wildlife Friendly Planting (Natural England, 2008. Gardening with Wildlife in Mind. London: Natural England)

Native and wildlife-friendly trees

Common Name	Scientific Name
Pedunculate oak	*Quercus robur*
Ash	*Fraxinus excelsior*
Wych elm	*Ulmus glabra*
Whitebeam	*Sorbus aria agg.*
Rowan	*Sorbus aucuparia*
Aspen	*Populus tremula*
Apple	*Malus domestica*
Bird cherry	*Prunus padus*
Common alder	*Alnus glutinosa*
Crab apple	*Malus sylvestris*
Crack willow	*Salix fragilis*
Downy birch	*Betula pubescens*
Field maple	*Acer campestre*
Hornbeam	*Carpinus betulus*
Juniper	*Juniperus communis*
Large-leaved lime	*Tilia platyphyllos*
Small-leaved lime	*Tilia cordata*
Pear	*Pyrus communis*
Scots pine	*Pinus sylvestris*
Sessile oak	*Quercus petraea*
Silver birch	*Betula pendula*
Sweet chestnut	*Castanea sativa*
Wild cherry	*Prunus avium*
Wild service-tree	*Sorbus torminalis*
Yew	*Taxus baccata*

Native and wildlife friendly shrubs

Common Name	Scientific Name
Hazel	*Corylus avellana*
Elder	*Sambucus nigra*
Goat willow	*Salix caprea*
Hawthorn	*Crataegus monogyna*
Dog rose	*Rosa canina*
Guelder rose	*Viburnum opulus*
Gorse	*Ulex europaeus*
Broom	*Cytisus scoparius*

Wayfaring tree	*Viburnum lantana*
Wild privet	*Ligustrum vulgare*
Bell heather	*Erica cinerea*
Bilberry	*Vaccinium myrtillus*
Black currant	*Ribes nigrum*
Blackthorn	*Prunus spinosa*
Buckthorn	*Rhamnus catharticus*
Butcher's-broom	*Ruscus aculeatus*
Cross-leaved heath	*Erica tetralix*
Dogwood	*Cornus sanguinea*
Field rose	*Rosa arvensis*
Holly	*Ilex aquifolium*
Midland hawthorn	*Crataegus laevigata*
Spindle	*Euonymus europaeus*