



WATERMEAD,
HENFIELD ROAD,
HORSHAM

PRELIMINARY
ECOLOGICAL
APPRAISAL (PEA)

EARLSWOOD HOMES
SOUTH EAST LTD.

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QUALITY ASSURANCE

This report has been prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Report Writing (2nd Edition, December 2017).

The facts stated in this report are true to the best of our knowledge and belief, and any opinions expressed are held genuinely and in accordance with the accepted standards of the profession. ACD Environmental Ltd is a CIEEM Registered Practice.

Client:	Earlswood Homes South East Ltd.
Site/job:	Watermead, Henfield Road, Horsham, RH13 8DT
Author:	Caitlin van Staden
Technical review:	Lisa Durrant

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1 EXECUTIVE SUMMARY

Purpose of report	To assess the potential ecological impacts of a proposed development as a parcel of land known as Watermead, Henfield Road, Cowfold, Horsham, RH13 8DT, clearly identifying any potential effects on important ecological features (including designated sites or protected species), making design recommendations, and detailing any mitigation and/or compensation measures that would be required and how these could be secured. The report also details how the proposed development could achieve Biodiversity Net Gain.
Description of proposed development	Full planning permission is being sought for the construction of 9 new residential dwellings and associated infrastructure. The proposed development would lead to the loss of scattered trees, the removal of mixed scrub and scattered vegetation.
Brief description of the Site	The Application Site comprises three connected commercial warehouses, two disused derelict sheds, a derelict three-sided low-roofed barn, scattered trees, grassland, bramble scrub and two parcels of woodland. The Application Site is situated in a residential area and is neighboured by residential properties with associated private gardens to the north, east, and south aspects. The Application Site abuts a horse-grazed field to the west. The proposed development will comprise nine new residential dwellings and related infrastructure.
Designated nature conservation sites	The Application Site does not lie within the ZOI for any SPAs or SAC's, or within any IRZ's of any SSSI's. The data search confirmed that no non-statutory sites were identified within 2 km of the Application Site.
Key habitats	The most important habitats present within the Application Site comprise two parcels of woodland: a larger mixed other woodland in the northern corner and a smaller broadleaved woodland in the southern corner. Several scattered trees are also present on the Application Site which are of ecological importance.
Key species	The Application Site has the potential to support nesting birds, commuting and [REDACTED], and hedgehog.
Potential impacts & mitigation/compensation measures	Clearance of suitable bird nesting habitat will need to take place outside of the nesting bird season or following a check for nesting birds by an ecologist. A sensitive lighting scheme will be required to avoid impacts on commuting and foraging bats. Best practice guidelines will be followed during the development to ensure there is no harm to [REDACTED] other small animals using the site for foraging/commuting. Additionally, as the Application Site is likely to support [REDACTED], extra considerations need to be made. Prior to the commencement of works, an additional site walkover will be required [REDACTED]

Enhancements	Specific enhancements for protected species should include incorporating bat and bird boxes into the structures of new buildings, and creating hibernacula for reptiles, and invertebrates in the form of log piles within the Application Site where suitable. Ornamental shrub planting should include flowering species suitable for invertebrates including pollinators.
Conclusions	Provided the measures outlined within this report are followed, the proposals will be in accordance with the Horsham District Planning Framework and the NPPF.

2 INTRODUCTION

- 2.1. This report provides an assessment of the ecological effects of the proposed development within a residential area known as Watermead, Henfield Road, Cowfold, Horsham, RH13 8DT, hereafter referred to as the 'Application Site' (see Image 1). The principal author of this report is Caitlin van Staden. The client is Earlswood Homes South East Ltd.

Background

- 2.2. The Application Site comprises three connected commercial warehouses, two disused derelict sheds, a derelict three-sided low-roofed barn, scattered trees, grassland, bramble scrub and two parcels of woodland; a larger mixed other woodland in the northern corner of the Application Site and a smaller broadleaved mixed woodland in the southern corner. The Application Site is situated in a residential area and is neighboured by residential properties with associated private gardens to the north and east aspects. The Application Site abuts grassland to the west, and a main road to the east. The proposed development within the Application Site will comprise of nine new residential dwellings and related infrastructure.

Competence

- 2.3. This report has been written by Caitlin van Staden, an Assistant Ecologist at ACD Environmental Ltd. Caitlin has a degree in Veterinary Bioscience with majors in Ecology from the University of Surrey and has experience performing surveys with the Surrey Wildlife Trust and West Surrey Badger Group. Caitlin is a Qualifying Member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and is working towards obtaining Natural England Class Licences for bats, hazel dormice *Muscardinus avellanarius* and great crested newts *Triturus cristatus*.
- 2.4. A Technical Review of this report has been undertaken in line with ACD Environmental Ltd's Quality Assurance procedures. The Technical Review was undertaken by Lisa Durrant. Lisa is a Senior Ecologist at ACD Environmental Ltd. She has 13 years' experience in ecological consultancy and holds Natural England Class License for bats (Level 2), great crested newts *Triturus cristatus*, dormice *Muscardinus avellanarius*, and barn owl *Tyto alba*. She is a Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM).

Purpose of the report

- 2.5. The purpose of this Preliminary Ecological Appraisal (PEA) is as follows:

- To identify and describe all potentially significant ecological effects associated with the proposed development.
- To set out the mitigation measures required to ensure compliance with nature conservation legislation and relevant planning policy, and to address any potentially significant ecological effects.
- To identify how mitigation measures will/could be secured.
- To identify any significant residual ecological effects and set out any compensation measures proposed to address these.
- To identify appropriate enhancement measures in order to achieve Biodiversity Net Gain.
- To set out the requirements for post-construction monitoring.

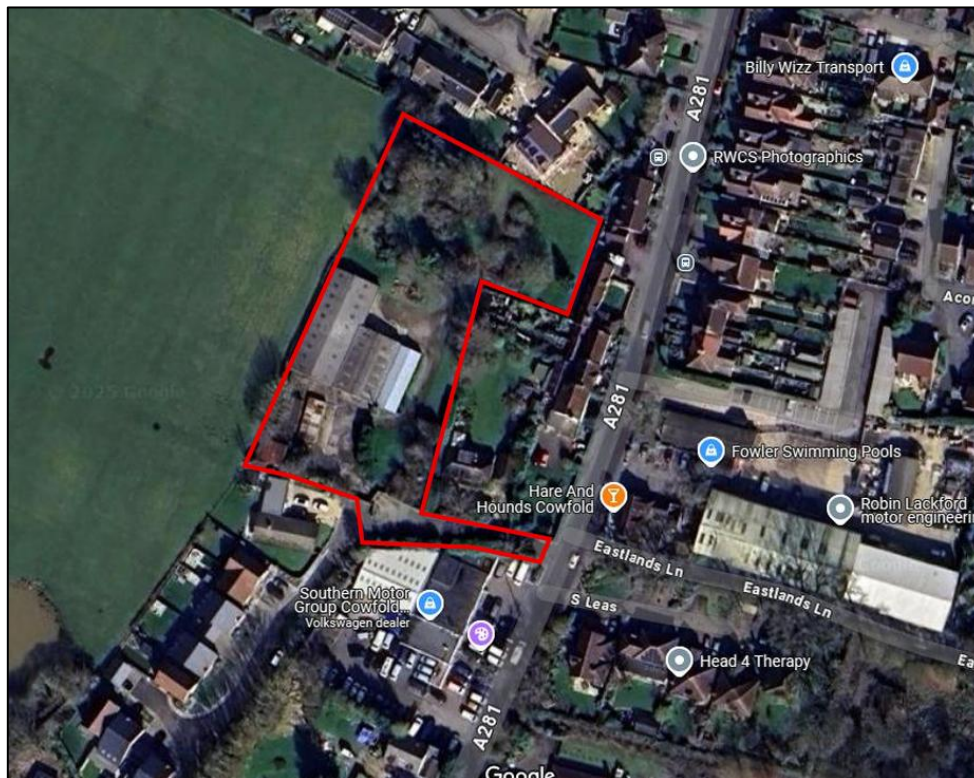


Image 1: Approximate Application Site boundary shown in red¹.

¹ Map data, Google 2025

3 PLANNING POLICY AND LEGISLATION

Legislation

3.1. The following pieces of legislation are of specific relevance to this assessment:

- The Environment Act 2021. This piece of legislation is of relevance because all planning permissions granted in England are mandated to deliver at least 10% Biodiversity Net Gain from 12th February 2024.
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019² because the Application Site has the potential to support nesting birds.
- Wildlife and Countryside Act 1981³ (as amended, including by the Countryside and Rights of Way Act 2000).
- Natural Environment and Rural Communities (NERC) Act 2006⁴. Section 41 includes lists of habitats and species recognised as of 'principal importance' for the conservation of biodiversity. Section 40 of the NERC Act 2006 requires all public bodies to have regard for biodiversity conservation when carrying out their function. This is commonly referred to as the 'biodiversity duty'.
- Protection of Badgers Act 1992.
- Hedgerows Regulations 1997.

3.2. The following pieces of legislation have been considered, but are not considered to be of specific relevance in this case:

- Water Framework Directive 2000.

Environment Act 2021

3.3. In accordance with the Environment Act 2021⁵, mandatory Biodiversity Net Gain (BNG) came into effect as of 12th February 2024 for developments in the Town and Country Planning Act 1990, unless exempt. It also applies to small sites as of 2nd April 2024.

² Great Britain. *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019* No.579 [online]. Available from: <https://www.legislation.gov.uk/ukdsi/2019/9780111179512/contents>

³ Great Britain. *Wildlife and Countryside Act 1981* [online]. Available from: <http://www.legislation.gov.uk/ukpga/1981/69/contents>

⁴ Great Britain. *Natural Environment and Rural Communities Act 2006* [online]. Available from: <http://www.legislation.gov.uk/ukpga/2006/16/contents>

⁵ <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

- 3.4. Schedule 7A of the Act makes provision for grants of planning permission in England to be subject to a condition, to secure that the 'biodiversity gain objective' is met.
- 3.5. The 'biodiversity gain objective' is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.
- 3.6. The biodiversity value attributable to the development is the total of:
- a) the post-development biodiversity value of the onsite habitat,
 - b) the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and
 - c) the biodiversity value of any biodiversity credits purchased for the development.
- 3.7. The relevant percentage is 10%, but the Secretary of State may by regulations amend this paragraph so as to change the relevant percentage.
- 3.8. The biodiversity value of any habitat or habitat enhancement are to its value as calculated in accordance with the 'Biodiversity Metric'.
- 3.9. Every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition in sub-paragraph (2), which states that the development may not be begun unless:
- (a) a biodiversity gain plan has been submitted to the planning authority
 - (b) the planning authority has approved the plan.
- 3.10. Local Planning Authorities (LPAs) will have to approve a biodiversity net gain plan for development work before it can start.

Planning policy

National Planning Policy Framework 2024⁶

- 3.11. Paragraphs 187-191 of the NPPF relate to 'Conserving and enhancing the natural environment' and Paragraphs 192-195 relate to 'Habitats and Biodiversity'.

⁶ HM Government. *National Planning Policy Framework December 2024*. Available at:
<https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

3.12. Paragraph 187 of the NPPF states the following:

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

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);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

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 and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”

3.13. Paragraph 193 of the NPPF states the following:

“When determining planning applications, local planning authorities should apply the following principles:

“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;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments),

should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

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

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.”

Horsham District Planning Framework⁷

3.14. Chapter 9 of the Horsham District Planning Framework (HDPF) discusses the Conservation and Enhancement of the Natural and Built Environment. Under this section, Policies 26 and 31 relate to ‘Countryside Protection’, and ‘Green Infrastructure and Biodiversity’, respectively.

3.15. Policy 26 (Countryside Protection) states the following:

“Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location, and in addition meet one of the following criteria:

- 1. Support the needs of agriculture or forestry;*
- 2. Enable the extraction of minerals or the disposal of waste;*
- 3. Provide for quiet informal recreational use; or*
- 4. Enable the sustainable development of rural areas. In addition, proposals must be of a scale appropriate to its countryside character and location.*

Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located, including;

⁷ Horsham District Planning Framework November 2015.

- 1. The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change;*
- 2. The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features; and*
- 3. The landform of the area.”*

3.16. Policy 31 (Green Infrastructure and Biodiversity) states the following:

“1. Development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss, and ensures that the ecosystem services of the area are retained.

2. Development proposals will be required to contribute to the enhancement of existing biodiversity, and should create and manage new habitats where appropriate. The Council will support new development which retains and /or enhances significant features of nature conservation on development sites. The Council will also support development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks.

3. Where felling of protected trees is necessary, replacement planting with a suitable species will be required.

4. a) Particular consideration will be given to the hierarchy of sites and habitats in the district as follows:

i. Special Protection Area (SPA) and Special Areas of Conservation (SAC)

ii. Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs)

iii. Sites of Nature Conservation Importance (SNCIs), Local Nature Reserves (LNRs) and any areas of Ancient woodland, local geodiversity or other irreplaceable habitats not already identified in i & ii above.

b) Where development is anticipated to have a direct or indirect adverse impact on sites or features for biodiversity, development will be refused unless it can be demonstrated that:

i. The reason for the development clearly outweighs the need to protect the value of the site; and,

ii. That appropriate mitigation and compensation measures are provided.

5. Any development with the potential to impact Arun Valley SPA or the Mens SAC will be subject to a HRA to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the HRA of this plan.”

4 METHODOLOGY

Scope of assessment

- 4.1. This report focuses on 'important ecological features', i.e. those which are considered to be of relevance to the decision-making process and could be affected by the proposed development. Important ecological features include protected species, habitats/species of 'principal importance' for biodiversity conservation (i.e. Section 41 habitats/species⁸), birds of conservation concern⁹, invasive non-native plant species¹⁰, and habitats and species identified as priorities for conservation in the local Biodiversity Action Plan (BAP).

Zone of influence

- 4.2. The 'zone of influence' (ZOI) is the area over which important ecological features (on-site or off-site) may be affected as a result of the proposed development and associated activities. The ZOI can vary for different ecological features, depending on their sensitivity to environmental change.
- 4.3. The ZOI for statutory designated sites has been informed by Natural England's Sites of Special Scientific Interest (SSSIs) Impact Risk Zones¹¹ (IRZs). IRZs define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. This has been determined as part of the desk study, as discussed below.

Desk Study

- 4.4. The following information was requested from Surrey Biodiversity Information Centre for a search area of 2km around the Application Site boundaries.

- Legally protected and notable species records;

⁸ Section 41 (41) of the Natural Environment and Rural Communities (NERC) Act, which came into force on 1st October 2006, requires the Secretary of State to publish a list of habitats and species which are of principle importance for the conservation of biodiversity in England.

⁹ Red list species are those that are globally threatened, whose population or range has declined rapidly in recent years (i.e. by more than 50% in 25 years), or which have declined historically and not recovered. Amber list species are those whose population or range has declined moderately in recent years (by more than 25% but less than 50% in 25 years), those whose population has declined historically but recovered recently, rare species (<300 breeding pairs or <900 wintering individuals), those with internationally important populations in the UK, those with localised populations, and those with an unfavourable conservation status in Europe. Species that meet none of these criteria are Green-listed.

¹⁰ Invasive non-native plants (Section 14) on Schedule 9 of the Wildlife & Countryside Act 1981 (as amended).

¹¹ Natural England (June 2019). Natural England's Impact Risk Zones for Sites of Special Scientific Interest (For use by Local Planning Authorities to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites and determine when to consult Natural England).

- Statutory designated sites; and
- Non-statutory designated sites.

4.5. The MAGIC website¹² was used to carry out a search for SSSIs, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) with an IRZ that falls within the Application Site, in July 2025.

Field surveys

4.6. A summary of ecological field surveys is provided in **Table 1**. Descriptions of full survey methods are provided in **Appendix 5**.

Table 1: Field surveys

Survey	Surveyor/s	Survey date/s	Study Area	Relevant guidelines
UK Hab Survey	Caitlin van Staden, Benjamin Prego	14 th July 2025	Red line boundary	UKHab Ltd (2023) ¹³
Preliminary Roost Assessment	Caitlin van Staden, Benjamin Prego	14 th July 2025	All buildings within red line boundary	Collins (2023) ¹⁴
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

¹² Multi Agency Geographic Information for the Countryside [online]. Available at: <https://magic.defra.gov.uk/>

¹³ UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <http://www.ukhab.org>)

¹⁴ Collins, J. (ed.) (2023). Bat Surveys for Professional Ecologists: Good practice Guidelines (4th Edition). The Bat Conservation Trust. London.

¹⁵ Harris, S., Cresswell, P., and Jefferies, D. (1989). Surveying Badgers. Mammal Society.

Limitations

- 4.7. There were no limitations during any of the surveys.

Assessment methodology

- 4.8. The habitats and species evaluations and likely effects are made with reference to the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment¹⁶ (EclA).
- 4.9. The importance of ecological features has been assessed by carrying out a suite of specialist surveys (Table 1) to determine whether protected species/habitats, and/or species/habitats of conservation concern are present in the Application Site or its ZOI, then comparing their status at the international/national/county/regional/local scale, through the use of available contextual information, to establish the importance of those features in a geographical context.
- 4.10. The overall effect of the proposed development on a given feature has been predicted, considering the baseline data collected through desk study and field survey, and the various impacts expected to occur. An assessment has then been made as to whether the effect on each important ecological feature is likely to be significant or not.
- 4.11. Significance is the weight that should be attached to effects when decisions are made. For the purpose of an EclA, a likely significant effect is an effect that either supports or undermines biodiversity conservation objectives for important ecological features (which could be species populations/groups of species, habitats, or a designated site), or for biodiversity in general. Effects have been considered significant at a wide range of scales, from national to local.
- 4.12. A sequential process has been adopted to avoid/mitigate, and if required, compensate for significant negative ecological effects. This is referred to as the 'Mitigation Hierarchy'. Avoidance includes measures to change the design of the proposed development to avoid an impact occurring. Mitigation includes measures to avoid or reduce the negative impacts of the proposed development. Compensation addresses significant negative residual effects (those likely to occur after avoidance and mitigation have been considered). It is this objective of compensation, and not its location, that distinguishes compensation from 'mitigation'.
- 4.13. In the EclA, it is only essential to assess and report significant residual effects that remain after mitigation measures have been taken into account. However, the potential significant effects without mitigation as well as the residual significant effects following mitigation have been

¹⁶ CIEEM (2019). Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater and Coastal, Version 1.1. updated September 2019. Chartered Institute of Ecology and Environmental Management, Winchester.

presented where the mitigation proposed is experimental, unproven or controversial and/or to demonstrate the importance of securing the measures proposed through planning conditions or obligations.

Valuation

4.14. The value of important ecological features (sites, habitats and species) is assigned according to their scale of importance using the following terms:

- International importance – ecological features of international importance such as SPAs and SACs, and/or sites that support internationally-important populations of species.
- National importance – ecological features of national importance such as SSSIs, features which meet the criteria for designation as a SSSI, and/or sites that support nationally-important populations of certain species.
- Regional importance – ecological features of regional importance, such as a species population that is of importance at a scale greater than the County, but does not meet the criteria for National Importance
- County importance – ecological features of county-scale importance, including features that have been designated as local wildlife sites, or meet the criteria for designation as a local wildlife site, and/or county-important populations of species
- Local importance – ecological features of local importance, including habitats or species populations listed as being of nature conservation importance (e.g. S41, local BAP, or listed in local planning policy) which are not considered to be of County importance by virtue of the quality, size/number, rarity, the extent to which they are threatened throughout their range, or to their rate of decline.

Precautionary principle

4.15. The evaluation of significant effects is based on the results of the ecological surveys carried out in the Application Site and other available evidence. In cases of reasonable doubt, where it is not possible to robustly justify a conclusion of no significant effect, a significant effect is assumed. Where uncertainty exists, it has been duly acknowledged.

5 BASELINE ECOLOGICAL CONDITIONS

Context

- 5.1. The Application Site comprises three connected commercial warehouses, two disused derelict sheds, a derelict three-sided low-roofed barn, scattered trees, grassland, bramble scrub and two parcels of woodland: a larger mixed other woodland in the northern corner of the Application Site and a smaller broadleaved mixed woodland in the southern corner. The Application Site is situated in a residential area and is neighboured by residential properties with associated private gardens to the north and east aspects. The Application Site abuts grassland to the west and a main road to the east. The proposed development within the Application Site will comprise of nine new residential dwellings and related infrastructure.

Designated Sites

- 5.2. There were no SSSIs, SACs, and SPAs with IRZs within the boundary of the Application Site identified in the data search.
- 5.3. There were no Local (non-statutory) Wildlife Sites, formerly known as Sites of Nature Conservation Importance (SNCIs) in Sussex, identified within 2km of the Application Site.
- 5.4. There are numerous areas of ancient semi-natural woodland, which is a Priority Habitat, within 2km of the Application Site. The closest is located approximately 450m south-west of the Application Site.

Habitats

- 5.5. Habitats are listed in order of importance. All the features described are shown on the Baseline Habitat Plan in **Appendix 1**.

Woodland

- 5.6. Two small parcels of woodland were identified within the Application Site. The first parcel of woodland is classified as an 'other mixed woodland' and will remain largely unaffected by the proposed development. This parcel is located along the north-west corner of the Application Site and species present include sycamore *Acer pseudoplatanus*, English oak *Quercus robur*, blackthorn *Prunus spinosa*, hawthorn *Crataegus monogyna*, cypress *Cupressus sp.*, willow *Salix sp.*, spruce *Picea sp.*, and ash *Fraxinus excelsior*.
- 5.7. Additionally, the woodland hosts scrub-understory. Species present here included lords and ladies *Arum maculatum*, pendulous sedge *Carex pendula*, common nettle *Urtica dioica*,

common ivy *Hedera helix*, bramble *Rubus fruticosus*, and holly *Ilex aquifolium*.

- 5.8. The second parcel is smaller and was identified in the south-east corner of the Application Site. This parcel of woodland was classified as 'other broadleaved woodland.' It too will remain largely untouched by the proposed development. Tree species present here include ash, silver birch *Betula pendula*, willow and English oak.

Bramble scrub

- 5.9. Three small sections of scrub were identified within the Application Site. A section was located along the northern boundary of the site and was dominated by bramble with grey willow *Salix cinerea*, also present. A larger section was identified in the centre of the site, south of the larger woodland parcel. This appeared to be bramble scrub which had been cut back. A third section of scrub was identified in the south-eastern corner behind the disused sheds. The majority of species was also bramble.
- 5.10. Given the nature of this habitat, it is considered to be of **site level importance** only.

Scattered Trees

- 5.11. The Application Site supports several scattered trees, ranging in size from small to medium. Species identified include spruce, willow, English oak *Quercus robur*, damson *Prunus domestica*, elder *Sambucus nigra*, cypress *Cupressus sp.*, and silver birch.
- 5.12. The majority of the trees are in a moderate condition with five in good condition and one in poor condition (English Oak). All the trees are considered to be of **site-level importance**.

Modified Grassland

- 5.13. A parcel of modified grassland was identified within the Application Site. This parcel of grassland will be largely removed during the proposed development and is located in the north-east corner of the Application Site.
- 5.14. Species identified here included Yorkshire fog grass *Holcus lanatus*, perennial ryegrass *Lolium perenne*, red fescue *Festuca rubra*, white clover *Trifolium repens*, creeping buttercup *Ranunculus repens*, common fleabane *Pulicaria Dysenterica*, ribwort plantain *Plantago lanceolata*, ground ivy *Glechoma hederacea*, and wood dock *Rumex sanguineus*.
- 5.15. The modified grassland is considered to be of **site-level importance**.

Ruderal vegetation

- 5.16. Two parcels of ruderal vegetation were located within the north of the Application Site. A second parcel was identified to the south of the access road into the Application Site.
- 5.17. Species identified include common ragwort *Senecio jacobaea*, common dock, thistle *Cirsium*, and bristly oxtongue *Helminthotheca echioides*.

Ornamental hedgerow

- 5.18. Two ornamental hedgerows were identified within the Application Site.
- 5.19. One hedgerow was identified to the south of the existing buildings on-site and was entirely comprised of Leyland cypress.
- 5.20. Another hedgerow was identified to the south of the access road into the Application Site. Species present here include ash and cherry laurel *Prunus laurocerasus*.

Buildings and hardstanding

- 5.21. The Application Site contains three connected commercial warehouses, two disused, derelict sheds, and a derelict three-sided low-roofed barn.
- 5.22. The driveway is paved road from the gate and leads up to the front of the warehouse.

Artificial unvegetated, unsealed surface

- 5.23. A degraded, gravel driveway curves round the eastern side of the warehouse.

Fauna

Invertebrates

- 5.24. The Application Site contains variable suitable habitats within the parcel of woodland, including the scattered trees, some wood piles, underbrush and vegetation debris for common invertebrate species and protected species, such as stag beetles *Lucanus cervus*, small heath *Coenonympha pamphilus*, brown hairstreak *Thecla betulae*, common darter *Sympetrum striolatum*, and toadflax brocade *Calophasia lunula*.
- 5.25. As such, the species likely to be present are considered to be common and widespread in the local area and the invertebrate assemblage onsite is therefore considered to be of **importance within the ZOI**, which, in this case is the Application Site boundary.

Great crested newts

- 5.26. The data search returned multiple records of great crested newt within 2km of the Application Site, most recently in 2010. According to MAGIC maps, there are two further records of great crested newts in 2019 located within 2km of the Application Site.
- 5.27. One pond was identified onsite during the survey but had dried up and is considered to remain dry all year round. There are also various ponds located within 500m of the Application Site, with the closest approximately 150m south-west. However, these ponds have been scoped out for further consideration as they are surrounded by several dispersal barriers including roads, isolating them from the Application Site.
- 5.28. The Application Site itself consists of limited habitats that could support great crested newts during their terrestrial phase. As such, due to the dispersal barriers between the Application Site and the offsite pond, and the lack of suitable waterbodies onsite, great crested newts are **likely absent** from the Application Site and have been scoped out of further assessment.

Reptiles

- 5.29. The data search returned multiple records of grass snake *Natrix Helvetica*, slow worm *Anguis fragilis*, adder *Vipera berus*, and common lizard *Zootoca vivipara* within 2km of the Application Site. The most recent of these records was obtained in 1991.
- 5.30. The habitats within the Application Site are considered to have some limited potential for reptiles, such as slow-worms *Anguis fragilis*, due to the presence of scrub and woodpiles for foraging and refuge. However, there are limited areas for such reptiles to bask as the canopy above the woodland is mostly intact, and the grassland is cut to a short sward. Therefore, the site is considered **low potential** for reptiles and considerations will need to be made.

Birds

- 5.31. The data search returned records for 46 bird species within 2km of the Application Site. The relevant notable species have been grouped by their UK conservation status according to the RSPB, where birds are split into conservation priority from red (most critical group), amber (next most critical group) to green (least critical group) as displayed in **Table 2** below:

Table 2: Notable bird records within 2km of the Application site.

Common name	Taxon name	Status
Swift	<i>Apus apus</i>	Red
Cuckoo	<i>Cuculus canorus</i>	Red
Skylark	<i>Alauda arvensis</i>	Red

Common name	Taxon name	Status
Mistle thrush	<i>Turdus viscivorus</i>	Red
Spotted flycatcher	<i>Muscicapa striata</i>	Red
Starling	<i>Sturnus vulgaris</i>	Red
House sparrow	<i>Passer domesticus</i>	Red
Linnet	<i>Linaria cannabina</i>	Red
House martin	<i>Delichon urbicum</i>	Red
Tree pipit	<i>Anthus trivialis</i>	Red
Yellowhammer	<i>Emberiza citrinella</i>	Red
Bullfinch	<i>Pyrrhula pyrrhula</i>	Red
Nightingale	<i>Luscinia megarhynchos</i>	Red
Marsh Tit	<i>Poecile palustris</i>	Red
Mallard	<i>Anas platyrhynchos</i>	Amber
Song thrush	<i>Turdus philomelos</i>	Amber
Grey wagtail	<i>Motacilla cinerea</i>	Amber
Kestrel	<i>Falco tinnunculus</i>	Amber
Stock dove	<i>Columba oenas</i>	Amber
Meadow pipit	<i>Anthus pratensis</i>	Amber
Reed bunting	<i>Emberiza schoeniclus</i>	Amber
Shelduck	<i>Tadorna tadorna</i>	Amber
Whitethroat	<i>Curruca communis</i>	Amber
Dunnoek	<i>Prunella modularis</i>	Amber
Tawny owl	<i>Strix aluco</i>	Amber

5.32. Other notable bird species identified in the data search include red kite *Milvus milvus*, hobby *Falco subbuteo* and barn owl *Tyto alba*.

5.33. The Application Site supports a number of scattered trees and shrubs which are ecologically important for birds, providing suitable habitat for nesting, as well as foraging and shelter opportunities. The Application Site is therefore considered to be of **site level importance** for breeding birds.

Bats

5.34. The data search returned records of the following bat species within 2km of the Application Site; Common Pipistrelle *Pipistrellus pipistrellus*, Soprano Pipistrelle *Pipistrellus pygmaeus*, Pipistralle species *Pipistrellus sp.*, Brown Long-eared Bat *Plecotus auritus*, Long-eared Bat species *Plecotus sp.*, Serotine *Eptesicus serotinus*, and Noctule *Nyctalus noctule*.

5.35. According to Magic Maps, the closest bat European Protected Species (EPS) Application license to the Application Site, is located approximately 2km south-west. The record indicates the presence of Common Pipistrelle.

Other mammals

- 5.48. The data search returned no records of water vole *Arvicola amphibius* or otter *Lutra lutra* within 2km of the Application Site. Due to a lack of local records, and no habitats suitable for otter and water vole identified within the Application Site, otter and water vole were deemed **likely absent**.
- 5.49. 22 records of hedgehog *Erinaceus europaeus* were identified within 2km of the Application Site. As such, it is considered possible that other small mammals such as hedgehogs are present and may occasionally utilise the site for foraging or commuting.
- 5.50. Although small mammals such as hedgehogs are not subject to legal protection in terms of their conservation status, they are subject to protection from cruelty under the Wild Mammals Protection Act and the Animal Welfare Act 2006¹⁷. Therefore, due diligence must be exercised during clearance/groundworks to ensure mammals that may be present are not harmed.

¹⁷ Great Britain. *Wild Mammals Protection Act and the Animal Welfare Act 2006* [online]. Available from: [Wild Mammals \(Protection\) Act 1996 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1996/12/section/1)

6 SCHEME DESIGN

- 6.1. The proposed development comprises nine new residential dwellings. The proposed development would lead to the removal of grassland, scrub, and some individual scattered trees and hedgerows, identified as H1, H2, H3, 6, 12 to 17, and 29 to 32.



Image 2: Proposed Development Site Plan (May 2026)

7 DISCUSSION AND RECOMMENDATIONS

- 7.1. In accordance with CIEEM guidelines, the following important ecological features have been identified with the potential to be affected by the proposed development and carried forward for further assessment:

Table 3: Important ecological features brought forward for impact assessment

Statutory sites	None
Non-statutory sites	None
Habitats	Woodland, scattered trees, bramble scrub.
Species and species groups	Commuting/foraging bats, nesting birds, reptiles, invertebrates, [REDACTED] and other mammals

- 7.2. The following ecological features have been scoped out of the ecological impact assessment, owing to the conclusion that no significant effects are predicted:

Table 4: Ecological features scoped out of the impact assessment

Statutory sites	None
Non-statutory sites	None
Habitats	Grassland and ruderal vegetation
Species and species groups	Roosting bats, great crested newts, hazel dormice, otters and water voles

Statutory and non-statutory sites

- 7.3. The Application Site does not lie within the ZOI for any SPAs or SAC's, or within any IRZ's of any SSSI's, and as such, consultation with Natural England is not considered necessary.
- 7.4. The data search confirmed that no non-statutory sites were identified within 2 km of the Application Site.
- 7.5. No other impacts are predicted on statutory and non-statutory sites due to the distance from

the Application Site and the small-scale nature of the proposed development.

Habitats

Woodland

- 7.6. Two small parcels of woodland were identified within the Application Site. The first parcel, located in the north-west corner of the Application Site, is classified as an 'other mixed woodland'. Additionally, the woodland hosts scrub-understory.
- 7.7. The second parcel is smaller, and is located in the south-east corner of the Application Site. This parcel of woodland was classified as 'other broadleaved woodland.'
- 7.8. It is understood that both parcels of woodland will remain largely unaffected by the proposed development. The woodland habitats will be retained and suitably buffered during the proposed development in line with the root protection areas (RPAs) of all trees. Additionally, both parcels will be enhanced with additional planting.

Bramble scrub

- 7.9. Three small sections of scrub were identified within the Application Site. A section was located along the northern boundary, a second, larger section was identified in the centre of the site, south of the larger woodland parcel. A third section of scrub was identified in the south-eastern corner behind the disused sheds. All sections of scrub will be entirely removed.

Scattered trees

- 7.10. The Application Site supports several scattered trees, ranging in size from small to medium. An estimated eleven trees, and three hedgerows will be lost during the proposed development.
- 7.11. Any retained trees should be suitably buffered during the proposed development in line with their root protection areas.

Fauna

Invertebrates

- 7.12. To mitigate potential impacts on invertebrates, including stag beetles, existing features of value such as deadwood and vegetation debris should be retained in-situ, where possible. Where removal is necessary, these features should be dismantled sensitively, by hand and under the supervision of an ecologist. Additionally, these features should be relocated to suitable areas of retained habitat. Once development is complete, it is recommended that new log piles be created, using native timber, and should be included in the habitat creation plan.

Reptiles

- 7.13. The habitats within the Application Site were assessed to have limited potential for reptiles. As such, considerations need to be taken when clearing habitats. A reptile survey is not necessary, given the scope and size of the Site. At the commencement of works, sensitive vegetation clearance is advised and should be done under the supervision of an ecologist.

Birds

- 7.14. The trees within the parcels of woodland and the scattered trees provide suitable foraging opportunities and nesting habitat for birds.
- 7.15. Without appropriate mitigation, there is the potential for nests to be destroyed during the removal of suitable bird nesting habitat. In addition, without mitigation, increased disturbance as a result of construction noise, dust and vibration are likely to affect the ability of birds nesting within retained and off-site habitats to hold territory and breed successfully, if construction takes place in the breeding season. Ambient noise level increases would be variable, but at times there could be considerable increases in noise levels. This would lead to a temporary negative impact on nesting birds.
- 7.16. To protect nesting birds, the removal of suitable bird nesting habitat should ideally take place outside of the nesting bird season. If works must be undertaken during the nesting bird season (March to August inclusive) then these will be preceded by a check for active birds' nests undertaken by a suitably qualified ecologist. If no birds' nests are found then works can proceed within 48 hours; however, if an active bird's nest is found then works must stop and an appropriate buffer installed around the nest (usually 5m). The buffer must remain in place until the ecologist confirms the young have fledged.

Bats

- 7.17. The buildings and trees due to be removed onsite were assessed as having **negligible** potential for roosting bats due to the absence of suitable roosting features.
- 7.18. However, there is high potential for the Application Site to be used by commuting and foraging bats. It is, therefore, recommended that a sensitive lighting scheme be incorporated during the proposed development to protect potential commuting and foraging bat species. A natural buffer should be implemented around retained trees for the benefit of wildlife, incorporating a dark corridor with no additional lighting for the benefit of any potential commuting and foraging bat species.

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8 BIODIVERSITY NET GAIN

Biodiversity metric

- 8.1. A Biodiversity Metric assessment has been undertaken in accordance with the NPPF and Local Planning Policies to demonstrate how a 10% Biodiversity Net Gain will be achieved.
- 8.2. This has been calculated using the baseline habitat information collected during the UK Habitat Classification Survey and using the latest post-development drawings. A full methodology is provided in **Appendix 5**. A completed version of the Metric has been submitted in full as a separate Excel document.

Table 5: A summary of the results of the Biodiversity Metric.

On-site baseline	Habitat units	2.93
	Hedgerow units	0.07
On-site post-intervention	Habitat units	1.66
	Hedgerow units	0.49
Total net unit change	Habitat units	-1.27
	Hedgerow units	0.42
Total net % change	Habitat units	-43.28%
	Hedgerow units	635.53%

- 8.3. The results of the Biodiversity Metric assessment indicate that the proposed development within the Application Site will lead to a **43.28% loss** in habitat units. This does not meet the net gain target for habitat units. The trading rules regarding replacing medium distinctiveness habitats have also not been met.
- 8.4. Additionally, the proposed development will lead to a **635.53% gain** in hedgerow units due to the creation of new non-native ornamental hedgerows along roads within the development and new native hedgerows along the sections of retained woodland. This meets the 10% target headline for biodiversity net gain in hedgerow units and satisfies the trading rules in terms of replacing low and very low distinctiveness habitats.
- 8.5. The proposed development is currently resulting in a **43.28% loss** in habitat units. The following habitat creation and enhancement measures have been incorporated into the Biodiversity Metric to achieve this result. For details on locations of these habitats please refer to the habitat creation plan which is presented in **Appendix 2**.
- Both sections of woodland will be retained and enhanced from 'poor' to 'moderate' condition. This will be achieved by planting of new native tree species.

- One rain garden will be created in the proposed development area. This will be achieved through the planting of a mix of species including *Camassia quamash*, *Carex pendula*, *Geranium pratense*, *Pittosporum tenuifolium* 'Bannow Bay', *Salvia officinalis*, *Teucrium fruitcans*, and *Verbena bonoriensis*.
- Approximately 8 new small trees are to be planted around the Application Site to compensate for the loss of existing trees. These will consist of native species such field maple *Acer campestre*, downy birch *Betula pubescens*, wild cherry *Prunus avium*, rowan *Sorbus aucuparia*, and English oak.
- One new area of modified grassland in the form of amenity mown grassland will be created in 'moderate' condition.
- New areas of other neutral grassland will be created throughout the Application Site. These will be in 'moderate' condition, created through the seeding of EM1 Meadow Seed Mix (or similar and approved alternative). To ensure that the target condition is reached long-term, these areas will be managed through a mowing regime to ensure a high species richness is maintained. This will involve cutting the areas once or twice a year with a first cut in August/September and a potential second cut in February/March.

- 8.6. The proposals are currently failing to achieve a net gain over the 10% target headline. In order to meet this target, it is recommended that offsite biodiversity enhancement and habitat creation options are explored to achieve a 10% net gain. Alternatively, biodiversity credits can be purchased to compensate for the shortfall in biodiversity units achieved by the proposed development within the Application Site.
- 8.7. Additionally, a scope of general ecological enhancements can be incorporated into the proposed development to provide opportunities for a range of species. Enhancements can include installing bat and bird boxes on existing mature trees and new ornamental shrubs could be planted for invertebrates and pollinators.
- 8.8. Integrated bat boxes such as the Schwegler 1FF can be installed on retained, mature trees or the Ibstock bat brick/Schwegler 1FE bat access with back panel can be installed within the walls of the completed buildings around the Application Site. These should be installed at least 4m above the ground and away from artificial light sources. Boxes should be installed facing a south, south-west or south-east direction, to expose them to the sun for parts of the day, and should be placed in an area that is sheltered from strong winds.

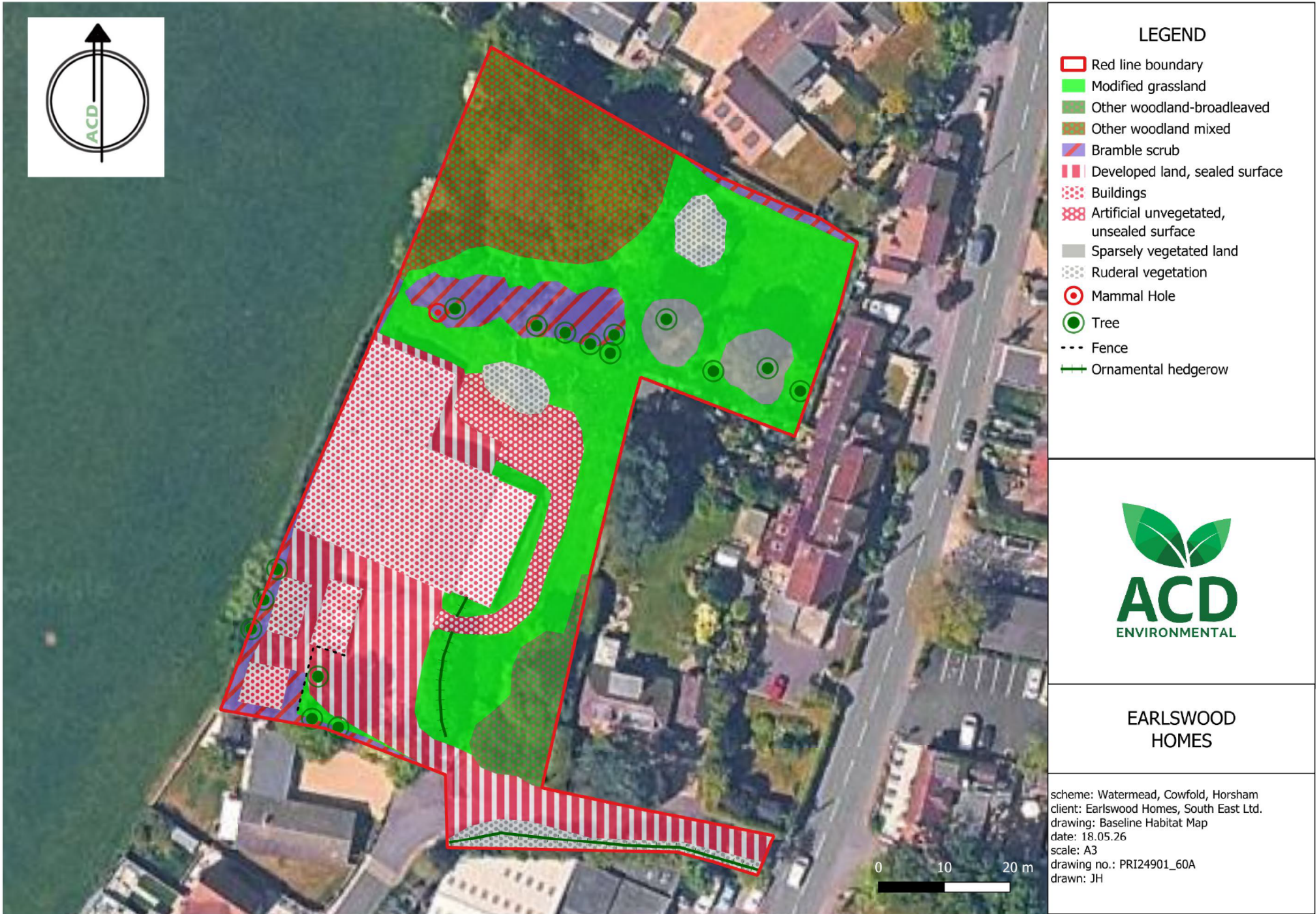
- 8.9. Bird boxes such as the Vivara Pro Seville 32mm WoodStone nest box can also be installed on the trunks of mature trees around the Application Site. Additionally, the Schwegler 1SP sparrow box/Vivara Pro WoodStone terrace, which are designed for colony nesting species and each box contains two or three brood chambers respectively, can be installed on/within the walls of the completed buildings. These should be installed at least 3m above the ground in areas that are sheltered from heavy rain and wind, and should be north or east-facing to avoid being exposed to excessive sunlight.
- 8.10. Any newly created areas of ornamental shrub planting within the Application Site will be designed to provide ecological opportunities for a number of species. Sweet nectar and protein-rich pollen, especially night-scented flowers, are excellent to encourage insects, a food source for bats. These species should be incorporated into the development where possible. It is recommended that any ornamental planting on site post-development should follow the 'RHS Plants for Pollinators' guidelines¹⁸ regarding the most suitable native and non-native plants to encourage pollinating insects.
- 8.11. To aid in the biodiversity of invertebrate species, particularly pollinating bees, Bee Bricks could be used in the construction of the proposed development. These bricks are designed to provide a safe nesting place for non-swarming solitary bees. In addition to these, bug hotels could be fixed to the rear of the proposed development upon completion.

¹⁸ RHS [Online] 'Plants for Pollinators'. Available at: www.rhs.org.uk/plantsforpollinators.

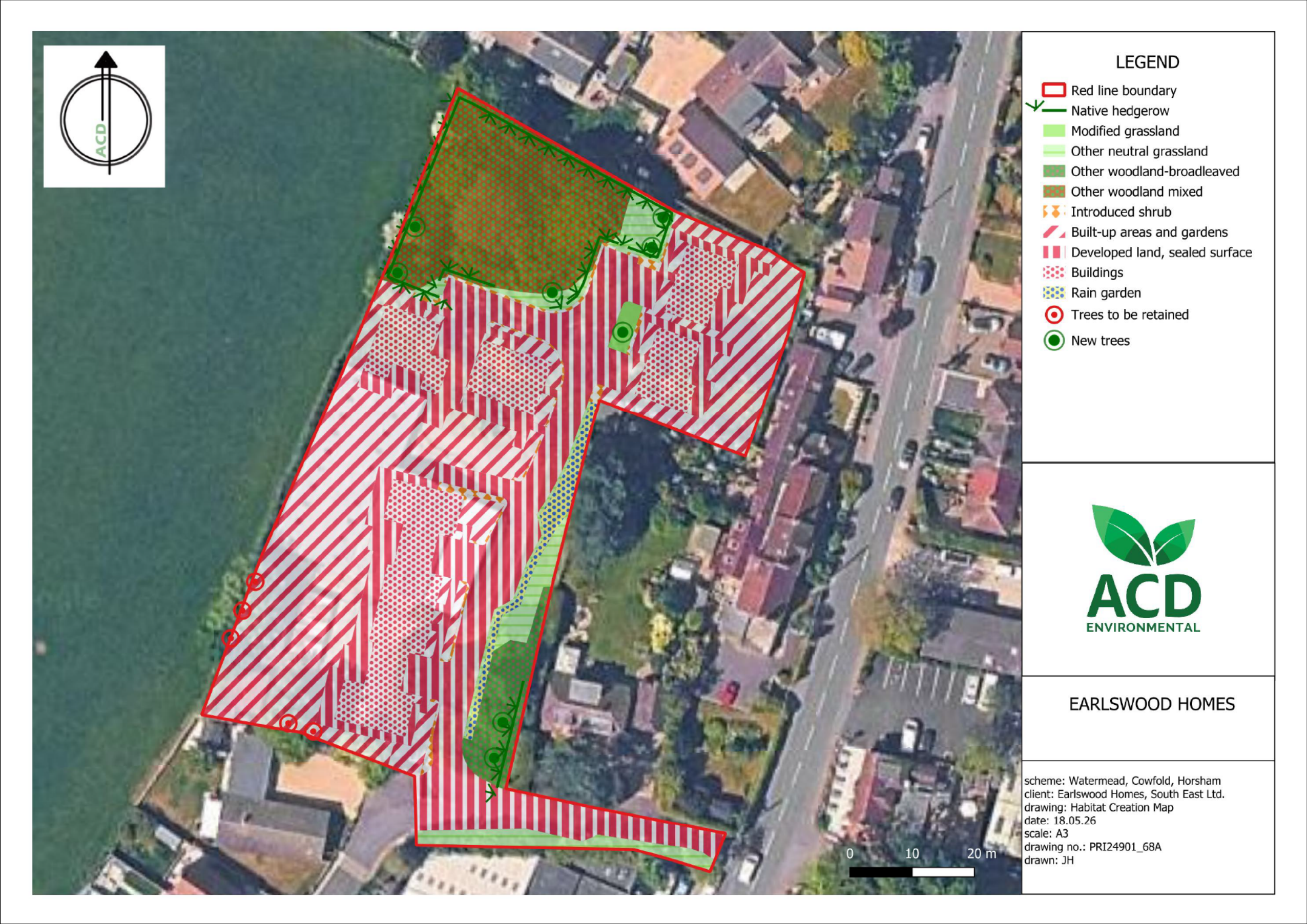
9 CONCLUSIONS

- 9.1. The Application Site comprises three connected commercial warehouses, two disused derelict sheds, a derelict three-sided low-roofed barn, scattered trees, grassland, bramble scrub and two parcels of woodland: a larger mixed other woodland in the northern corner of the Application Site and a smaller broadleaved mixed woodland in the southern corner. The Application Site is situated in a residential area and is neighboured by residential properties with associated private gardens to the north and east aspects. The Application Site abuts grassland to the west and a main road to the east.
- 9.2. The proposed development within the Application Site will comprise of nine new residential dwellings and related infrastructure and will result in the loss of grassland and some individual scattered trees.
- 9.3. Mitigation for invertebrates will involve the retention or sensitive relocation of valuable habitat features, with the creation of new log piles once development has been completed. For reptiles, vegetation clearance will be undertaken sensitively and under the supervision of an ecologist.
- 9.4. To protect nesting birds any scattered trees, sections of tree line, and scrub to be removed will be subject to a nesting bird check prior to any works, or will be carried out outside of the nesting bird season (March - August inclusive).
- 9.5. For bats, general measures such as timing restrictions will apply and a sensitive lighting strategy will be implemented to protect suitable foraging and commuting features for bats on-site and maintain dark corridors for bats during the construction and operational phases of the development.
- █ [REDACTED]
- 9.7. The proposed development will result in a **loss of 43.28%** in habitat units and a **635.53% gain** in hedgerow units. It is recommended that, offsite biodiversity enhancement and habitat creation options are explored. Alternatively, biodiversity credits can be purchased to compensate for the shortfall in habitat units.
- 9.8. Assuming the implementation of the mitigation and enhancement measure set out in this report, the proposed development would conform to relevant Local Planning Policies and has the potential to deliver Biodiversity Net Gain in accordance with the NPPF and Local Planning Policies.

APPENDIX 1: BASELINE HABITAT PLAN



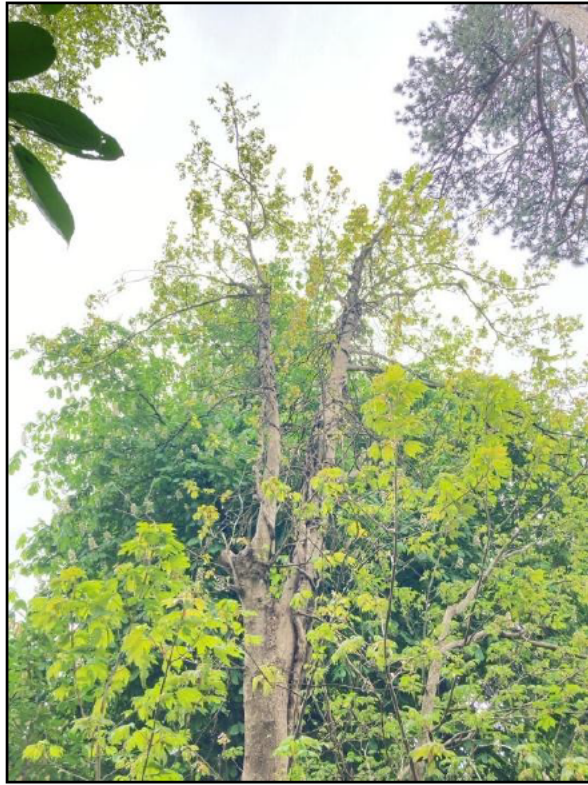
APPENDIX 2: HABITAT CREATION PLAN



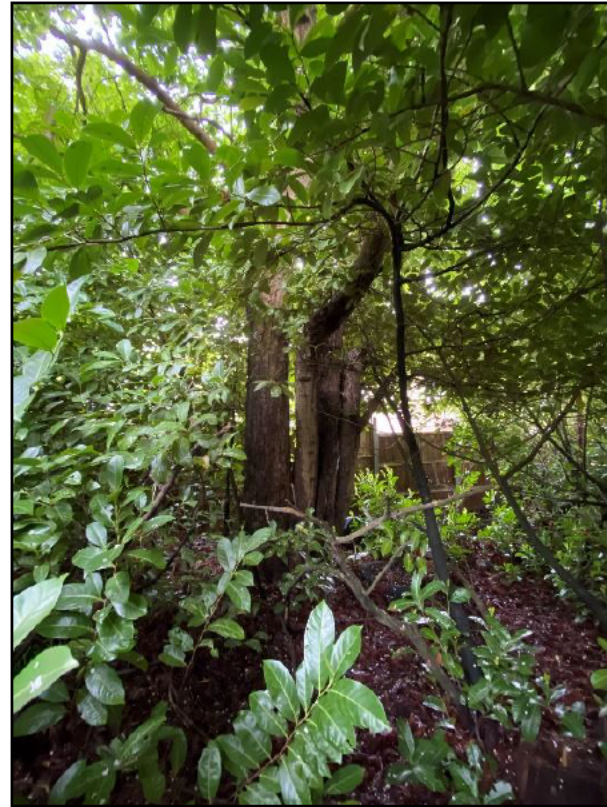
APPENDIX 3: TREE PROTECTION PLAN



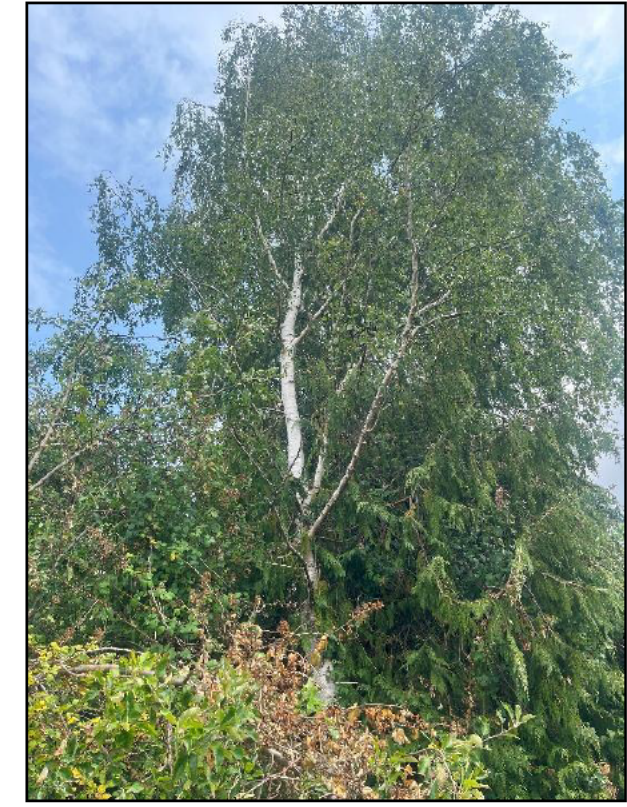
APPENDIX 4: SITE PHOTOGRAPHS



Spruce



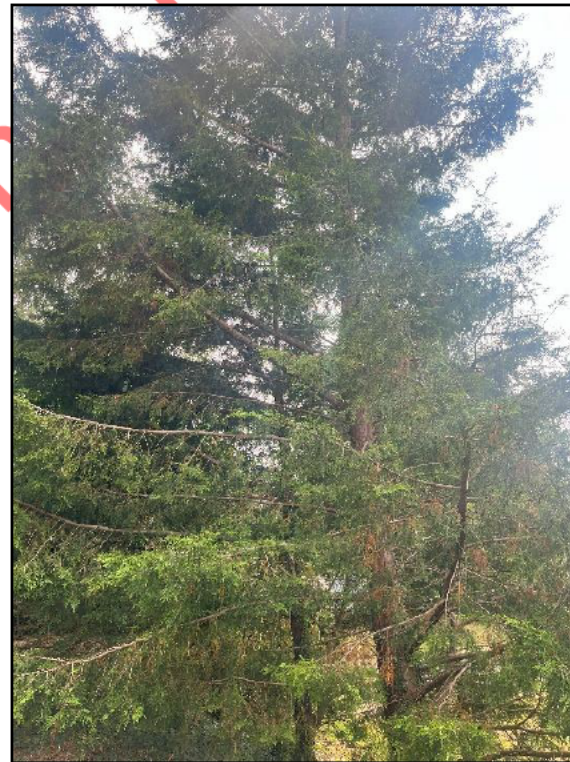
Willow



Silver Birch



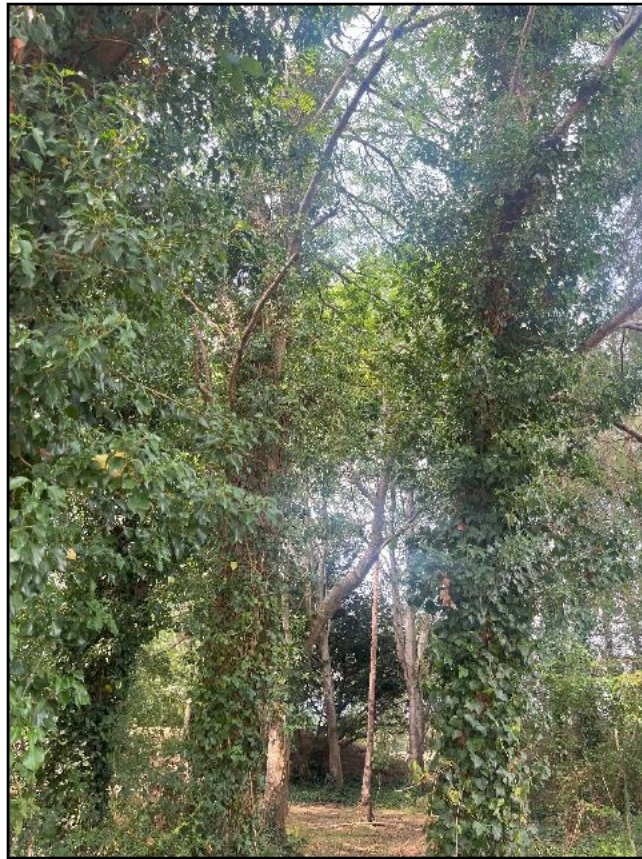
Oak and Damson Trees



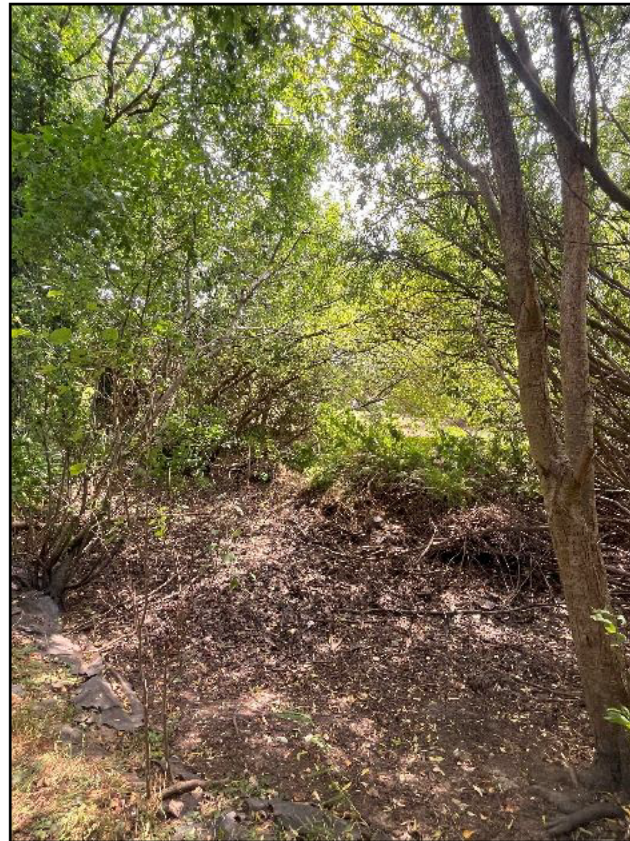
Cypress



Line of Cypress Trees



Woodland



Dried Pond



Grassland



Bramble Scrub



Mammal Hole – view 1



Mammal Hole – view 2

APPENDIX 5: FIELD SURVEY METHODOLOGY

UKHab Survey

The Baseline Habitat Plan is shown in Appendix 1.

The UKHab methodology¹⁹ was used to classify the Application Site into habitat types, as listed in the UKHab User Guide on the 14th July 2025. Secondary codes have been applied where appropriate.

Incidental records of fauna were made during the UKHab survey and the habitats identified were evaluated for their potential to support legally protected species and species of Principal Importance.

Limitations

There were no limitations associated with the UKHab Survey.

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¹⁹ UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <http://www.ukhab.org>)

²⁰ Harris, S., Cresswell, P., and Jefferies, D. (1989). *Surveying Badgers*. Mammal Society.

²¹ Scottish Badgers (2018). *Surveying for Badgers: Good Practice Guidelines*. Version 1.

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Limitations

There were no limitations associated with the UKHab Survey.

Preliminary Bat Roost Assessment

A Preliminary Roost Assessment (PRA) was carried out²². This is an external and internal inspection survey, the purpose of which is to search for bats/evidence of bats and assess the likelihood of bats being present and the need for further survey and/or mitigation.

A systematic search was made of the building and the ground, especially below potential access points where present. Such features include windows sills, window panes, walls, tiles, weather boarding, lead flashing, eaves, behind surfacing materials and under tiles, and other cracks and crevices that provide protection from the elements. Such features are known to be used by roosting bats.

The internal inspection included searching for the following evidence of roosting bats:

- Roosting bats within crevices or free-hanging
- Bat corpses e.g. on the floor, in uncovered water (header) tanks or other containers in roof voids
- Bat droppings beneath roosting features
- Feeding remains e.g. moth/butterfly *Lepidoptera* spp. wings and beetle *Coleoptera* spp. wing casings

²² Collins J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)*. The Bat Conservation Trust, London.

- Scratch marks and characteristic staining from urine and/or fur oil beneath roosting features e.g. on roofing timbers and walls within roof voids
- 'Clean' gaps associated with bat roosts
- Bat-fly *Nycteribiid* spp. pupal cases
- Droppings, corpses, feeding remains and/or bat-fly pupal cases beneath roof insulation, which indicates use by bats before the insulation was installed
- Clean swept floors, which may indicate evidence has been removed

The internal inspection included searching for the following features:

- Gaps within the structure of the roof e.g. mortise joints and junctions between roof timbers and between timbers and walls, and between the roof lining and roof covering
- Gaps within the structure of walls and potential access points to cavity or rubble-filled walls
- Gaps around the structure chimneys or within disused chimneys
- Suitable locations for free-hanging bats and/or night/feeding perches e.g. timber beams
- Gaps between lintels above windows or doors
- Light gaps in the roof indicating access points to the outside
- Cool areas suitable for torpor or hibernation e.g. cellars.

The following equipment was used for the bat survey:

- Camera to record evidence and potential roosting sites; and
- Personal protective equipment (e.g. boots, mobile telephone).

Bird nesting

Evidence of nesting birds recorded during the PRA and any incidental bird observations/birds heard were noted.

The assessment included searching for the following with regard to barn owl:

- Birds present - roosting or nesting within buildings/trees;
- Birds present - corpses;
- Pellets - undigested feeding remains;
- Nests - formed on layers of degraded pellets;
- Droppings or 'liming' - often present on/below roosts such as roof timbers;
- Eggs - intact/broken or within nest/below nest; and
- Feathers - adult or natal down.

The internal inspection of the building included searching for the following features with regard to barn owl:

- Suitable access points (e.g. open doorways);
- Suitable ledges for nesting; and
- Suitable timbers for roosting.

APPENDIX 6: BIODIVERSITY METRIC METHODOLOGY

Assessment Framework

For the purposes of this assessment, the Biodiversity Metric has been utilised.

The Biodiversity Metric is accompanied by a 'Calculation Tool'. This was used to calculate the biodiversity units for the Application Site before (baseline) and after development. The User Guide²³ has been followed.

Habitat Measurements

Baseline habitat measurements were carried out in line with the results of the UK Hab Survey. Measurements were made using QGIS.

Proposed habitat measurements were taken from the Latest Proposal Drawings.

Measurements were entered to the nearest 0.01ha.

Distinction Assessments

Habitats are assigned to distinctiveness bands automatically within the Metric. These are based on an assessment of the distinguishing features of a habitat or linear feature, including the consideration of species richness, rarity (at local, regional, national and international scales), and the degree to which a habitat supports species rarely found in other habitats.

The distinctiveness band of each habitat is preassigned in the Biodiversity Metric. The bands are based upon the UK habitat classification system. A combination of simple rules and professional judgement have been used to assign each habitat type to the appropriate distinctiveness band. The distinctiveness categories used are tailored to habitat type.

Distinctiveness Assessments are assigned according to **Table 6**.

Table 6: Distinctiveness Assessment

Category	Scores	Multiplier
Very High	8	Priority habitats as defined in Section 41 of the Natural Environment and Rural Communities (NERC) Act that are highly

²³ STEPHEN PANKS A, NICK WHITE A, AMANDA NEWSOME A, JACK POTTER A, MATT HEYDON A, EDWARD MAYHEW A, MARIA ALVAREZ A, TRUDY RUSSELL A, SARAH J. SCOTT B, MAX HEAVER C, SARAH H. SCOTT C, JO TREWEEK D, BILL BUTCHER E and DAVE STONE A (2024). *Statutory Biodiversity metric: User Guide*. Natural England. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

Category	Scores	Multiplier
		threatened, internationally scarce and require conservation action e.g. blanket bog
High	6	Priority habitats as defined in Section 41 of the NERC Act requiring conservation action e.g. lowland fens
Medium	4	Semi-natural habitats not classed as a Priority Habitat
Low	2	Habitat of low biodiversity value. Temporary grass and clover ley; intensive orchard; rhododendron scrub
Very Low	0	Little or no biodiversity value e.g. hard standing or sealed surface

Condition Assessments

Condition assessments for existing habitats can be found in a separate excel document.

Strategic significance

The spatial location of a habitat is treated as a component of the quality of a habitat parcel in the same way as distinctiveness or condition. Strategic significance is used to determine whether the habitat is of increased importance due to its location.

Risk Factors

As part of any proposed habitat creation and restoration, risk factors must be taken into account to correct for disparity, delay or risk. These values are preassigned within the Statutory Biodiversity Small Sites Metric and take into consideration the following factors:

- Temporal risk; and
- Difficulty of creation and restoration.

Advance/delay in habitat creation takes into account any significant time difference in the creation of a habitat type. This time is measured in full years and is entered by the assessor.

Habitat creation in advance is rewarded by reducing the difficulty and temporal risk multipliers applied. This reflects the lower delivery risk - there is less risk of failure when a habitat is already making progress towards its target condition.

Limitations

Although the Statutory Biodiversity Metric is a valuable tool underpinned by ecological evidence, there are certain limitations that must be considered when applying the metric. The key principles and rules for the use of the Statutory Biodiversity Metric have been followed at all times, in line with these limitations. Further detail is available within the Statutory Biodiversity Metric User Guide.

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