t: 01392 260420

e: info@eadecology.co.uk w: www.eadecology.co.uk

Registered in Cardiff Company No. 4671180



Technical Note

Garden Mill, Kingsbridge Project:

Title: Biodiversity Net Gain Assessment

24 May 2023 Date:

Client: **Blakesley Estates**

Reference: 230515_ EAD Ecology_P1198_Garden_Mill_Kingsbridge_BNG_Technical_Note:

May 2023

Edward Walker, ACIEEM **Prepared:**

Approved: Dr. Matt Cowley, MCIEEM, CEnv

1 Introduction

- EAD Ecology was commissioned by Blakesley Estates to update the Biodiversity Net Gain (BNG) 1.1.1 assessment undertaken for the Section 73 application (Planning Application Ref: 3122/21/VAR) for development at Garden Mill, Kingsbridge, hereafter referenced as 'the Site', refer to Figure 1.
- A BNG assessment for the Section 73 application was previously prepared in October 2021 (EAD 1.1.2 Ecology 2021). This report updates the 2021 BNG assessment to reflect subsequent changes to the proposed development layout and landscaping; the assessment has also been updated to use the latest version of the Defra Biodiversity Metric (4.0). This Technical Note sets out the methodology and results of the BNG assessment; a completed BNG spreadsheet is also provided separately.

2 Methodology

The BNG assessment utilises the most up to date Defra Biodiversity Metric calculation tool (version 2.1.1 4.0, Natural England 2023) with reference to supporting documents (Natural England 2023a, 2023b & 2023c). The completed Metric has been supplied separately as a digital file (Excel spreadsheet).

Pre-development habitats

- 2.1.2 The Biodiversity Metric 4.0 requires a 'baseline' of habitats and their condition on site prior to works commencing. As habitats on the site have largely been cleared, the baseline was informed by review of an earlier ecology report (Quantock Ecology July 2021), which was based on survey carried out in June 2021 prior to site clearance and by a Habitat Condition Assessment survey undertaken by an experienced (FISC level 4) ecologist from EAD Ecology on 23 August 2021. Site clearance operations had commenced prior to the August 2021 survey, although localised areas of grassland remained, which could be assessed. Other habitats (e.g., hedgerow and scrub) were still present and could be reliably surveyed in August 2021.
- 2.1.3 The results of the Habitat Condition Assessment were assessed against the Defra Metric 4.0 Habitat Condition Criteria (Natural England 2023c); refer to Appendix 1. Whilst the results were

- gathered with reference to V3.0 criteria, this was not considered a significant limitation as the results could be reliably adapted to 4.0 criteria.
- 2.1.4 Baseline habitat measurements were undertaken using ArcGIS. Areas for baseline trees were calculated in accordance with guidance (Natural England 2023a) using the integrated Metric 4.0 Individual Tree Helper.

Post-development habitats

- 2.1.5 Post-development habitat areas are based on the landscape plans for the development; refer to Figures 3 and 4. Habitat measurements were undertaken using ArcGIS. Areas for proposed individual trees were calculated in accordance with guidance (Natural England 2023a) using the integrated Metric 4.0 Individual Tree Helper. Only new trees, hedgerow and habitats established within areas of public realm were included in the habitat creation calculations (trees and hedgerows to be established in gardens/private areas were excluded).
- 2.1.6 Interventions proposed to achieve the conditions specified in the Metric are detailed in Appendix 2. It is considered that these measures and targeted habitat condition are achievable, based on professional opinion and review of the relevant habitat condition criteria detailed in Defra Biodiversity Metric 4.0 documentation (Natural England 2023c). It assumes implementation of a Landscape and Ecological Management Plan (LEMP) providing appropriate planting and establishment specifications and a long-term habitat management plan.

Strategic Significance / Delivery

2.1.7 The Strategic Significance of Baseline and Post Construction habitats applied to the Metrics have been assigned in accordance with the Metric guidance (Natural England 2023a), with reference to site-specific information. A review of the Plymouth and South West Devon Joint Local Plan indicated that the site location was ecologically important for hedgerows and trees (High Strategic Significance). The hedgerows and trees were therefore categorised as 'Formally identified in local strategy', with the remaining habitats classified as 'Area/compensation not in local strategy/ no local strategy'. The site is located on the edge of Kingsbridge with predominantly urban habitat to the north and agricultural habitats on the remaining sides.

3 Biodiversity Net Gain

- 3.1.1 The pre-development biodiversity value of the Site is 5.38 'Habitat Units' and 8.49 'Hedgerow Units', there are no watercourses on site; refer to Table 1, Figure 2 and Appendix 1 for baseline summary.
- 3.1.2 The predicted post-development biodiversity value of the site, based on Figures 3 and 4, would be 2.47 'Habitat Units' and 7.36 'Hedgerow Units'.
- 3.1.3 The proposed development, therefore, is expected to deliver an on-site Biodiversity Net Loss of -2.91 'Habitat Units' (-54.05%) and a loss of -1.12 'Hedgerow Units' on-site (-13.23%); refer to Table 1.
- 3.1.4 To achieve 10% net gain in Habitat Units, a total of 5.92 Habitat Units would be required; therefore, off-site habitat creation or enhancement (i.e., 'biodiversity offsetting') would be required to deliver the shortfall of 3.45 Habitat Units; refer to Table 1.

3.1.5 To achieve 10% net gain in Hedgerow Units, a total of 9.34 Hedgerow Units would be required; therefore, off-site hedgerow creation or enhancement (i.e., 'biodiversity offsetting') would be required to deliver the shortfall of 1.98 Hedgerow Units; refer to Table 1.

Table 1: BNG Metric Summary 1

-		
On-site baseline pre-development	Habitat units	5.38
	Hedgerow units	8.49
On-site post-development	Habitat units	2.47
(Habitat retention, creation & enhancement)	Hedgerow units	7.36
On-site net change	Habitat units	-2.91
(Habitat retention, creation & enhancement)		(-54.05%)
	Hedgerow units	-1.67 (-
		19.62%)
Additional units required to deliver 10% gain, via Offsetting	Habitat units	3.45
	Hedgerow units	1.98

- 3.1.6 'Habitat Trading' requirements specified in the Metric 4.0 are currently not satisfied. This is due to the loss of 'Other neutral grassland' and 'Rural tree' on site. These are habitats of medium distinctiveness and, if lost, the 'same broad habitat or a higher distinctiveness habitat is required'. The 3.45 Habitat Units required through off-setting would therefore need to include creation or enhancement of other neutral grassland (at least 3.05 Habitat Units) and rural trees (at least 0.4 Habitat Units), to ensure trading rules are satisfied.
- 3.1.7 'Hedgerow Trading' requirements specified in the Metric 4.0 are also currently not satisfied. This is due to the reduction in quality of Hedgerow 1. This is no longer a 'Species-rich native hedgerow with trees associated with bank or ditch', as the trees have been removed. This is a habitat of 'Very High' distinctiveness and the same habitat will be required within the offset to replace that lost.

4 Conclusion and summary

- 4.1.1 The Biodiversity Net Gain calculations demonstrate that the proposed development layout and landscaping is predicted to deliver a -54.05% net loss in Habitat Units and a -13.23% net loss of Hedgerow Units. To achieve to required 10% net increase in Habitat Units, and to meet the required trading rules, a further 3.45 Habitat Units would need to be provided through offsetting, at least 3.05 of these units would need to be delivered through Other Neutral grassland and 0.4 units through rural trees.
- 4.1.2 To achieve the required 10% net increase in Hedgerow Units, and to meet the required trading rules, a further 3.25 Hedgerow Units would need to be provided through offsetting. To satisfy the trading rules, this must comprise 'Species-rich hedgerow with trees associated with bank or ditch'.

Biodiversity Net Gain Assessment – Garden Mill, Kingsbridge 230515_ EAD Ecology_P1198_Garden_Mill_Kingsbridge_BNG_Technical_Note: May 2023

¹ Headline figures reflect metric outputs which include built in rounding to two decimal places.

5 References

EAD Ecology. October 2021. Garden Mill Kingsbridge, Biodiversity Net Gain Assessment. A Report to Blakesley Estates.

Natural England (2023). The Biodiversity Metric 4.0 Auditing and accounting for biodiversity calculation tool. ISBN: 978-1-7393362-0-2

Natural England (2023a) Biodiversity Metric 4.0 User Guide. Natural England Joint Publication JP039.

Natural England (2023b) Biodiversity Metric 4.0 Short Data Input Guide. Natural England Joint Publication JP039.

Natural England (2023c) The Biodiversity Metric 4.0 -Technical Annex 1: Condition Assessment Sheets and Methodology. Natural England Joint Publication JP039. ISBN 978-1-7393362-2-6.

Figure 1: Site Location Plan

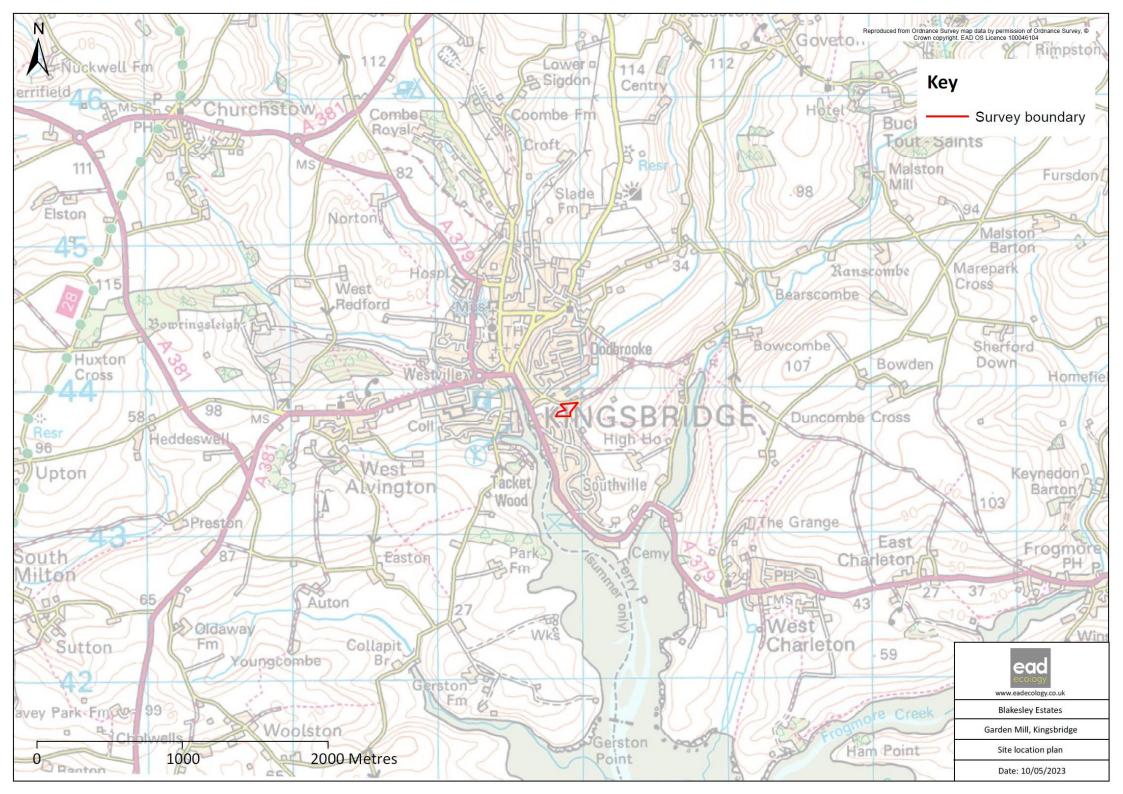


Figure 2: 2021 Pre-development (Baseline) Metric 4.0

Habitat Condition Assessment Plan

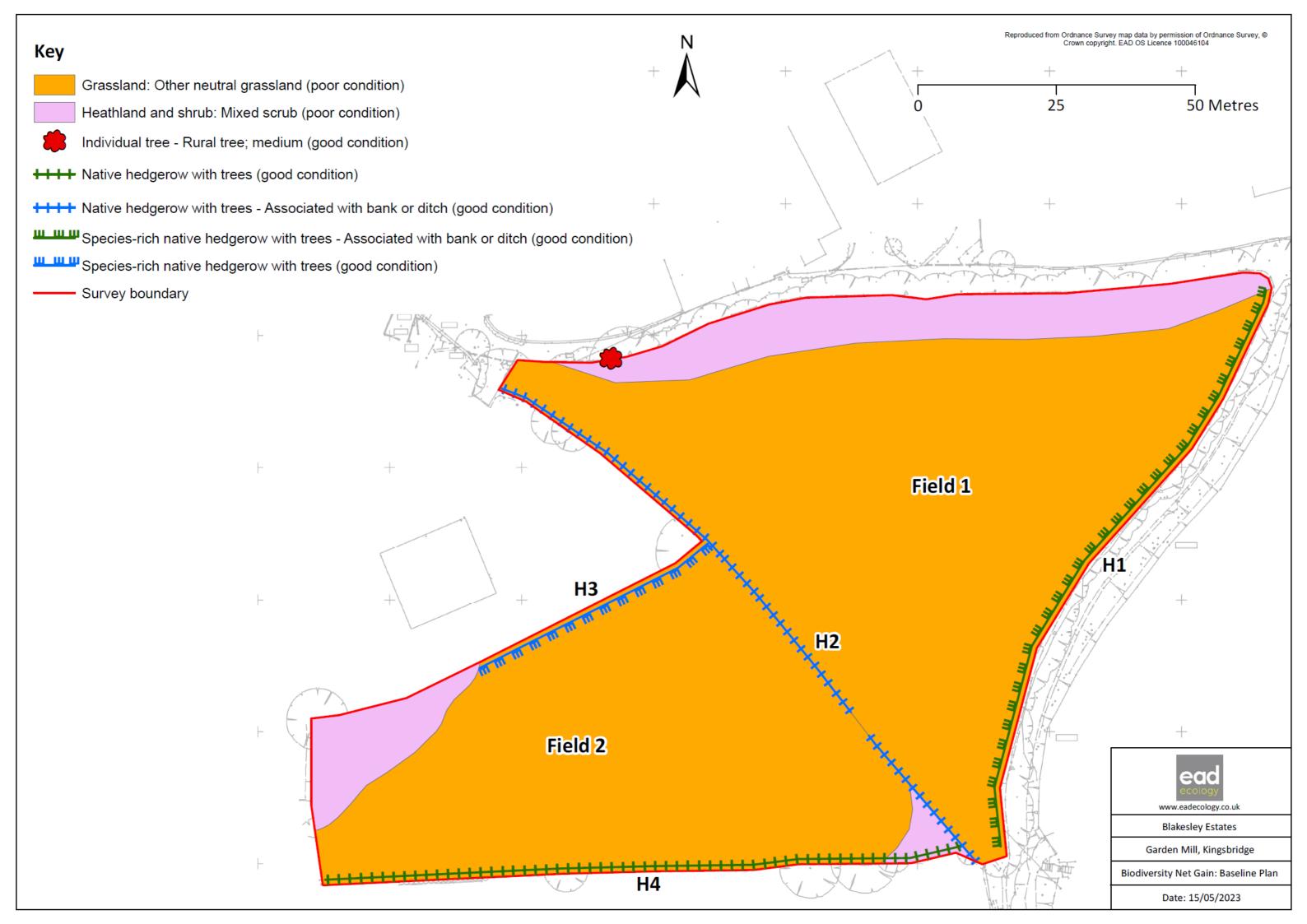


Figure 3: Post development landscape strategy



Bulb Planting

Common Name	Latin Name
Snowdrops	Galanthus nivalis
Daffodil	Narcissus 'Carlton'
Wild Garlic	Allium urnisum
English Bluebells	Hyacinthoides non-scripta

value providing flowers, fruit or nuts.

the complete contract actually a contract,							
Common Name	Latin Name	Girth	Form	Height	Clear Stem	Root	No.
Field Maple	Acer campestre 'Streetwise'	12-14cm	Heavy Standard	3.0-3.5m	Min 200cm	60L	4
Small Leaved Lime	Tilia cordata	12-14cm	Heavy Standard	3.0-3.5m	Min 200cm	60L	2
Wild Cherry	Prunus avium	10-12cm	Select Standard	3.0-3.5m	Min 175cm	40L	5
Bird Cherry	Prunus padus 'Albertii'	10-12cm	Select Standard	3.0-3.5m	Min 175cm	40L	2
English Oak	Quercus robur	6-8cm	Light Standard	2.0-2.5m	Min 150cm	25L	1
Disease-resistant Elm	Ulmus 'New Horizon'	12-14cm	Heavy Standard	3.0-3.5m	Min 200cm	60L	4
Monterey Pine	Pinus radiata	N/A	Feathered	1.0-1.25m	N/A	10-12L	3
Whitebeam	Sorbus aria	10-12cm	Select Standard	3.0-3.5m	Min 175cm	40L	2

Common Name	Latin Name	Form	Height	%	Mix.	Root
Corylus avellana	Hazel	Whip	60-80cm	15		BR
Crataegus monogyna	Hawthorn	Whip	60-80cm	20		BR
Sambucus nigra	Elderberry	Whip	60-80cm	20		BR
llex aquifolium	Holly	Leaders & Laterals	40-60cm	20		2L C
Prunus spinosa	Blackthorn	Whip	60-80cm	15		BR
Rosa canina	Dogrose	Whip	60-80cm	5		BR
Lonicera pericylmenum	Honeysuckle	Several Shoots	60-80cm	5		2L C

NOTE: THIS DRAWING MUST NOT BE USED FOR TENDER OR **CONSTRUCTION PURPOSES**



1:500 @A2 AUGUST 2021 LHC PROJECT NUMBER

CONTRACTORS MUST CHECK ALL DIMENSIONS ON SITE - ONLY FIGURED DIMENSIONS ARE TO BE WORKED FROM - DISCREPANCIES MUST BE REPORTED TO THE ARCHITECT BEFORE PROCEEDI

21024GMK

EXETER 01392 444334 ☐ PLYMOUTH

01752 669368

ST AUSTELL 01726 213435

lhc.net

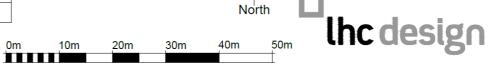
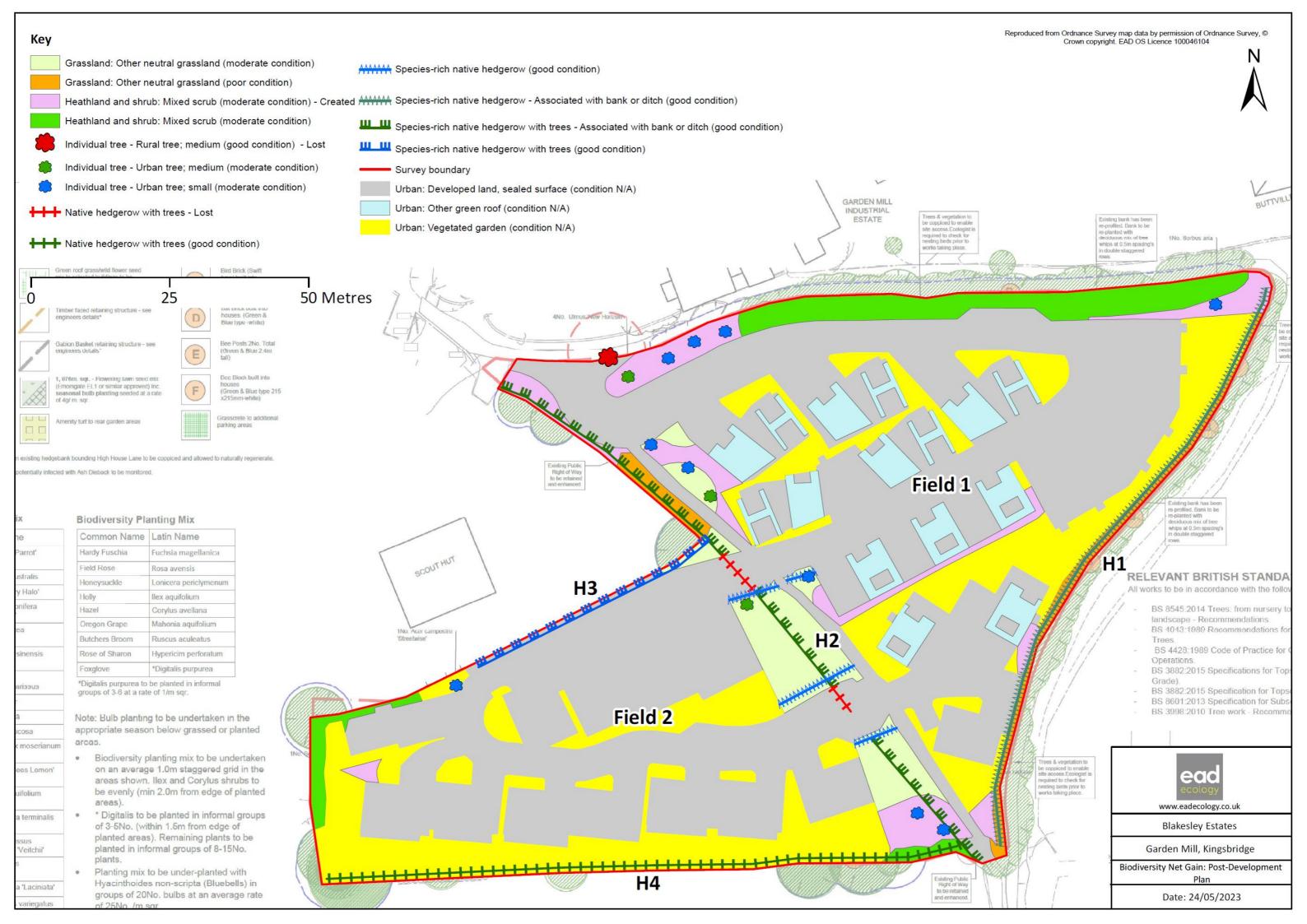


Figure 4: Post-development Metric Habitat Retention,

Creation and Enhancement Plan



Appendix 1: Baseline Habitat Condition Assessment Summary Tables

Table A1.1. Baseline Habitat Condition Assessment Results (April 2023); refer to Figure 2

Unit	nit Habitat type Area Condition		pitat type Area Condition Condition assessment notes			
J		(ha)	23.14.1.311		Strategic Significance	
Field 1 and 2	Grassland – Other neutral grassland	1.07	Poor	Fails condition criteria A: The appearance and composition of the vegetation does not closely match the characteristics of the specific grassland habitat type. Indicator species listed by UKHab for the specific grassland habitat type are not consistently present.	Area/compensation not in local strategy/ no local strategy/	
				Passes condition criteria B: Sward height is varied and therefore creates microclimates which would provide opportunities for insects, birds and small mammals to live and breed.		
				Passes condition criteria C: Cover of bare ground is less than 1%, including localised areas.		
				Fails condition criteria D: Cover of bracken is less than 20% and cover of scrub (including bramble) is less than 5%.		
				Passes condition criteria E: Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area, and there are no invasive non-native plant species (as listed on Schedule 9 of WCA) are present.		
				Fails condition F: There are fewer than 10 vascular plant species per m ² present, including forbs that are characteristic of the habitat type.		
	Heathland and shrub – Mixed scrub	0.15	Poor	Passes condition criteria A: The scrub is a good representation of the habitat type it has been identified as, based on its UKHab description (where in its natural range). The appearance and composition of the vegetation closely matches the characteristics of the specific scrub type. At least 80% of scrub is native, and there are at least three native woody species, with no single species comprising more than 75% of the cover (except hazel <i>Corylus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> or box <i>Buxus sempervirens</i> , which can be up to 100% cover).	Area/compensation not in local strategy/ no local strategy'	

Unit	Habitat type	Area (ha)	Condition	Condition assessment notes	Strategic Significance
				Fails condition criteria B: Seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are not all present.	
				Passes condition criteria C: There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA, 1981) and species indicative of suboptimal condition make up less than 5% of ground cover.	
				Fails condition criteria D: The scrub does not have a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	
				Fails condition criteria E: There are clearing, glades or rides present within the scrub, providing sheltered edges.	
	Individual trees - Rural tree;	0.036	Good	Passes condition criteria A: The tree is a native species (or at least 70% within the block are native species).	'Formally identified in local strategy'
	medium size			Passes condition criteria B: The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	
				Passes condition criteria C: The tree is mature (or more than 50% within the block are mature).	
				Passes condition criteria D: There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	
				Passes condition criteria E: Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	
				Passes condition criteria F: More than 20% of the tree canopy area is oversailing vegetation beneath.	

Table A1.2 Baseline Hedgerow Condition Assessment Results; refer to Figure 2

Hedge Refere nce	A1. Height (>1.5m average)	A2. Width (>1.5m average)	B1. Gap under canopy (<0.5m average)	B2. Canopy gaps (<10%, 5m max)	C1. Undisturbed ground (1m width at least 1 side)	C2. Nutrient- enriched perennial vegetation (<20% cover of the area of undisturbed ground.)	D1. Invasives/ Neophytes (non- natives) (<10%)	D2. Damage (<10%)	E1. One mature tree / 20-50m and more than 1 age class presen t	E2. Tree health (>95% in healthy condition)	Bank or ditch	Sp. rich	Length (km)	Condition
1	✓	✓	Χ	✓	✓	X	✓	✓	✓	✓	✓	✓	0.12	Good
2	✓	✓	✓	✓	√	X	√	√	✓	√	✓	Χ	0.12	Good
3	✓	✓	✓	✓	√	Х	✓	✓	✓	✓	Х	✓	0.05	Good
4	✓	✓	✓	Х	✓	Х	✓	✓	✓	✓	Х	Χ	0.12	Good

Appendix 2: Post-Construction Management and Interventions

Habitat	Predicted condition	Justification
Heathland and shrub –	Moderate	Plant diverse range of native woody species.
mixed scrub		Manage to encourage varied structure with different age classes of woody scrub species.
		Manage access to prevent damage to ground.
		Subject to management as detailed in LEMP ² .
Urban – Developed land; sealed surface	N/A	N/A
Urban – vegetated garden	N/A	Pollinator shrub and hedge planting subject to management as detailed in the LEMP ² .
Urban – Other green roof	N/A	N/A
Grassland – Other	Moderate	Areas adjacent to housing, assumed good condition is not possible due to probable trampling / disturbance.
neutral grassland		Establish low nutrient topsoil / subsoil profile appropriate for species rich meadow grassland.
		Sow with appropriate species rich neutral grassland native meadow seed mix.
		Implement varied cutting regime with removal of arisings.
		Spot treatment for non-native / undesirable species.
		• Subject to management as detailed in the LEMP ² .
Individual trees - urban trees (small and	Moderate	• Scattered trees will be planted throughout the Public Realm. Trees will comprise a range of native species including fruiting and flowering species of value to birds and invertebrates.
medium)		
Native hedgerows	Good	 Subject to management as detailed in the LEMP, including aftercare and watering during the establishment period². Manage hedgerows to maintain minimum height and width > 1.5m.
(retained and created)	Good	
(Hedgerows 2 and 3)		• Manage >1m width margin adjacent to hedgerow base (at least one side) to provide appropriate undisturbed vegetated buffer (<5% non-native or undesirable species).
(Heugerows 2 and 3)		• Subject to phased hedgerow laying and management as detailed in the LEMP ² .
Native hedgerow	Good	Assumed retained. Bounded by gardens (already garden to the south) so no access for long-term management. Not included in ownership of adjacent property; measures
(retained)		to protect hedgerow recommended in LEMP. May not retain 'good' condition; however, metric has not option for reduction in Condition.
(Hedgerow 4)		

_

 $^{^2}$ LHC design, (2021) $\it Garden \, Mill$, $\it Kingsbridge$, $\it Landscape \, \& \, Ecology \, Management \, Plan$