

Chaffins c/o Hannah McLaughlin @ DHA Planning Sent via email only.

14th October 2024

<u>SUPPORTING ECOLOGICAL STATEMENT – QUEENSWAY GATEWAY, CASTLEHAM, HASTINGS, EAST</u> <u>SUSSEX.</u>

Dear Sir / Madam,

Government planning practice guidance states the following information (see red text) must be submitted in response to the below questions as part of any planning application in which the statutory biodiversity gain condition applies to the development. Please

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition; the scheme / development proposals do not qualify for exemption from the mandatory BNG requirements.
- the pre-development biodiversity value(s); 0.70 habitat units.
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date; n/a.
- the completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value; the statutory biodiversity metric (released in February 2024) was used in this assessment. The metric accompanies this statement.
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have:
 - a statement to the effect that these activities have been carried out;
 - the date immediately before these activities were carried out;
 - the pre-development biodiversity value of the onsite habitat on this date;
 - the completed metric calculation tool showing the calculations, and
 - any available supporting evidence of this;

A significant amount of clearance / degradation work had already been completed at the time the ecological survey was carried out (23rd September 2024). I have had to make a number of assumptions, the main one being that the vegetation cleared was largely mixed scrub (based on the adjacent retained

Rocks Yard, Victoria Road Herstmonceux, East Sussex. BN27 4TQ. www.pjcconsultancy.com contact@pjcconsultancy.com 01233 225365 Unit 1, Hanover Mill Mersham, Kent. TN25 6NU. dominant habitat). I have also assumed that the cleared mixed scrub habitat was also in 'good' condition which.

- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); No irreplaceable habitats were identified on-site during the ecological survey.
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable). Not provided as falls outside our commissioned scope of works. However, this is not considered applicable given that almost the entirety of the site had been cleared prior to the ecological survey being undertaken.

In addition to the above, to summarise the findings of the biodiversity metric calculation, predevelopment, the site generates a total number of 0.70 habitat units. Post-development, the site is anticipated to generate approximately 0.19 habitat units. This represents a net-loss of 0.51 habitat units which equates to a net % change of -72.25% habitat units. The proposed development is therefore not anticipated to deliver their BNG targets and trading rules have not been satisfied.

BNG targets should therefore be met through off-site habitat creation and enhancement measures, for example by purchasing the relevant number of off-site units from a land manager / habitat bank provider. If the applicant chooses to purchase off-site units, they will need to explore the marketplace to find what is available to buy in order to meet your specific BNG requirements. The land manager / habitat bank provider you buy from will need to register the gain site on the national biodiversity gain sites register before, at the same time as, or after you buy units on it. Sites on the register may be allocated to specific development projects to help them achieve their biodiversity gain target. Any off-site gains will then need to be secured via a legal agreement (for example a S106 agreement or conservation covenant) which will set out who will do the BNG creation, enhancement and management work for 30 years (usually the land manager / habitat bank provider). Once you have found and agreed a contract with a land manager / habitat bank provider, either the land manager or applicant / developer (with the land manager's permission) must apply to record the allocation of the biodiversity units to your development on the biodiversity gain sites register. The allocation of any off-site biodiversity gains to your development will need to be recorded before the local planning authority can approve your biodiversity gain plan. A biodiversity gain plan can then be prepared and submitted to the local planning authority if the applicant / developer can meet their BNG requirements with off-site gains, and once the applicant / developer have recorded the allocation of any off-site biodiversity gains on the national biodiversity gain sites register. If developers cannot achieve on-site or off-site BNG, they must buy statutory biodiversity credits from the government. This should be a last resort.

If you have any queries regarding the above, please don't hesitate to contact me.

Yours sincerely

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