BNG ASSESSMENT

LAND TO NORTH OF ENNOR FARM, OLD TOWN, ST MARY'S, ISLES OF SCILLY

Client: *JC Consulting*

Our reference: *25-2-2*

Planning reference: *P/25/010/COU*

Report date: *27th February 2025*

Revision*: -*

Author: *James Faulconbridge BSc (Hons), MRes, MCIEEM*

Contact: *ios.ecology@gmail.com*

IOS Ecology

Table of Contents

1. Introduction

1.1. Overview

An ecological assessment of the proposed site of the temporary welfare cabins at Land To North Of Ennor Farm, Old Town, St Mary's, Isles of Scilly was conducted with regards to habitats. This was used to inform a Biodiversity Net Gain (BNG) assessment for the project.

The purpose of this report is to characterise the baseline habitats present on site and assess the impact of the proposed development on these receptors.

1.2. Site Description

The site is just under 0.5 hectares (ha) in size and is identified in Map 01 below. The central grid reference of the site is SV 91439 10449.

Map 01 – Showing the redline boundary of the site.

2. Methods

2.1. Vegetation and Habitat Assessment

An assessment was made of all areas of vegetation within the site and those habitats immediately bounding the site where this was pertinent to the development of appropriate enhancement proposals.

This involved a walkover survey to identify broad vegetation types, which were then classified against the UKHabs[1] classification.

A list of characteristic plant species for each vegetation type was compiled.

2.2. Approach to BNG

The assessment has been undertaken in accordance with the BNG principles outlined in The Statutory Biodiversity Metric User Guide (November 2023)[2].

The metric used in the assessment is the BNG Metric Release Date: July 2024[3].

The UKHabs Classification Version 2 was used to aid in the classification of habitats within the site.

2.3. Technical Competence and Experience

The surveys which support this assessment, as well as the BNG assessment itself, were undertaken by James Faulconbridge MRes MCIEEM trading as IOS Ecology.

James is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM); he is a Licensed Bat Worker (Class Licence Level 2) and has over 15 years' experience undertaking a range of ecological surveys and assessing the factors that affect ecology in relation to construction and the built environment.

2.4. Limitations

No limitations pertinent to the assessment of existing habitats or enhancement opportunities were noted.

The habitat baseline surveys were undertaken in late-February when some species such as annuals may not be present in the sward at this time of year. This would not impact the overall conclusions of the assessment.

[1] UKHab Ltd (2023). UK Habitat Classification Version 2.0

[2] https://assets.publishing.service.gov.uk/media/65673fee750074000d1dee31/The_Statutory_Biodiversity_Metric_-_Draft_User_Guide.pdf

[3] https://assets.publishing.service.gov.uk/media/669e4670ab418ab055592a23/The_Statutory_Biodiversity_Metric_Calculation_Tool_-_Macro_enabled_tool_23.07.2024.xlsm

3. Designated Sites

3.1. Designated Sites

The following Designated Sites are identified within 1km of the proposed development:

- **Isles of Scilly SAC Complex –** Encompassing the coastline around St Mary's and situated 300m to the south at its closest point, the SAC is designated for its nationally important numbers of Grey Seal and the nationally rare Shore Dock. Annex 1 habitats that are the primary reason for site selection include mudflats; inter-tidal sandflats; reefs and sub-tidal sandbanks.

- **Isles of Scilly SPA Complex –** Encompassing the coastline around St Mary's and situated 230m to the south at its closest point, the SPA designated for its internationally important seabird assemblage of 13 species including internationally important numbers of lesser black-backed gull and nationally important numbers of European storm petrel and European shag.

- **Lower Moors SSSI –** Situated 10m north-west of the site lies Lower Moors SSSI – this is a topogenous mire, whereby seasonal fluctuations of freshwater from rainfall cause the partial breakdown of plant material, which then turns to peat. The site has several, small shallow open water areas which are known to be important feeding areas for passage and over-wintering migrants and waders.

- **Peninnis Head SSSI –** Situated 850m south-west of the site lies Peninnis Head SSSI, designated primarily for its geology including prominent granite cliffs and tors. It also supports maritime heathland, maritime grassland and scrub habitats and populations of rare plants and lichens.

3.2. Impact Assessment

The small-scale nature of the proposed development, and the geographical separation between the development and the Designated Sites listed above will ensure no direct or indirect impact of the proposals upon these features.

The potential for impacts arising from the consented residential development on the site was considered in Planning Application P/21/002. This more extensive and permanent development identified no impacts[4], as confirmed by Natural England in their consultation response[5]. No additional risks or impacts requiring re-assessment of this conclusion are identified in this temporary use proposal.

[4] https://www.scilly.gov.uk/sites/default/files/planning-apps/planning-application-p/21/002/P-21-002%2029.%20Ecological%20Assessment%20V5.pdf
[5] https://www.scilly.gov.uk/sites/default/files/planning-apps/planning-application-p/21/002/P-21-002%20CONSULTATION%20RESPONSE%20-%20Natural%20England.pdf

4. Baseline

4.1. Overview

The site is a grassland field just to the north of Old Town Inn in Old Town, St Mary's.

The site has outline planning permission for conversion to residential development with associated landscaping, utilities and access. This consent was granted in P/21/002.

The current proposal relates to temporary siting of accommodation/welfare cabins on the site. It is understood that these cabins would remain on site for 1 year, after which the land would be restored to its baseline condition. It is understood that the active consent for permanent residential development granted in P/21/002 will proceed following the cessation of this temporary use.

The site is dominated by a grassland field with piles of hardcore along the western boundary. A small section of an elm tree line is present in the north-western corner. The northern and western boundaries comprise wooden post and rail fences which separate the site from adjacent offsite habitat, including the tree line present to the north. The eastern boundary is lined with a drystone wall and elm tree line but the redline boundary is set in from this feature to ensure an appropriate standoff to secure retention and protection of the feature as can be seen in Map 02 below.

Map 02 – Showing the baseline habitats present within the redline boundary of the site.

4.2. Artificial Unvegetated – Unfinished Surface

There are areas of stored hardcore along the western boundary of the site. There are occasional opportunistic ephemerals within these mounds but the quality of the substrate precludes significant colonisation at this stage in establishment.

This habitat is recorded for reference as part of the wider site context – no impacts to this habitat are proposed.

4.3. Other Neutral Grassland

The site is dominated by a grassland field which is classified as Other Neutral Grassland. There are abundant daffodils (*Narcissi sp*.) within the sward along with hybrid bluebell (*Hyacinthoides x massartiana*) indicating historic use of this field for bulb growing. In places, the daffodils are a co-dominant component of the sward.

The grassland sward comprises typical grass species of semi-improved pasture including Yorkshire fog (*Holcus lanatus*), red fescue (*Festuca rubra*), creeping bent (*Agrostis stolonifera*), cock's foot (*Dactylis glomerata*), and perennial rye grass (*Lolium perenne*). Herbaceous components include creeping buttercup (*Ranunculus repens*), cat's ear (*Hypochaeris radicata*), white clover (*Trifolium repens*), broad-leaf dock (*Rumex obtusifolius*), lesser celandine (*Ficaria verna*), ribwort plantain (*Plantago lanceolata*), dandelion (*Taraxacum officinale*), common daisy (*Bellis perennis*), and bird's foot trefoil (*Lotus corniculatus*). Occasional elm saplings (*Ulmus spp.*) and bramble (*Rubus fruticosus* agg.) were noted.

Invasive species present within the sward include three-cornered leek (*Allium triquetrum*), and Bermuda buttercup (*Oxalis pes-caprae*).

The grassland is in Poor Condition in accordance with the BNG Condition Assessment criteria (see Table 01).

Table 01 – Habitat Condition assessment for Medium+ distinctiveness grasslands as adapted from BNG Condition Assessment 6.

Criteria	Criteria Met?	Notes
A. The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type.	No	Abundance of narcissi as co-dominant at the time of survey, arising from previous use for flower farming - it cannot therefore be described as a 'good example' of SIG.
B. Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	No	There is variation but it does not rise to the proportions required to pass this criteria from a visual assessment.
C. Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Yes	Occasional patches created by rabbit grazing

Criteria	Criteria Met?	Notes
D. Cover of bracken is less than 20% and cover of scrub (including bramble) is less than 5%.	Yes	Evidence of bracken at peripheries - no sign of significant presence within the main sward presumably due to management
E. Combined cover of species indicative of suboptimal 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. If any invasive non-native plant species (as listed on Schedule 9 of WCA) are present, this criterion is automatically failed.	No	Presence of three-cornered leek (Schedule 9) alongside other locally relevant species such as Bermuda buttercup
F. There are 10 or more vascular plant species per m^2 present, including forbs that are characteristic of the habitat type	No	Excluding species in Footnote 3 and narcissi/bluebell as remnant crop species, an average of 5.6 species across 5x quadrats.
Number of Criteria Passed	**2**	**The grassland is in Poor condition**

4.4. Line of Trees - Habitat Description

A small line area of elm trees is present in the north-western corner of the site. These are young/semi-mature with ivy (*Hedera helix*) cladding in places. The understorey is largely as described for the pasture field within which they are set, with additional bracken (*Pteridium aquilinum*) and common nettle (*Urtica dioica*).

This habitat would not be impacted by the proposed development.

The tree line is in Moderate condition in accordance with the BNG Condition Assessment criteria (see Table 02).

Table 02 – Habitat Condition assessment for a line of trees as adapted from BNG Condition Assessment 16.

Criteria	Criteria Met?	Notes
At least 70% of trees are native species.	Yes	Elm dominated
Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.	No	Sparse - likely arising from outgrown suckering with irregular spacing
One or more trees has veteran features and or natural ecological niches for vertebrates and invertebrates, such as presence of standing and attached deadwood, cavities, ivy or loose bark.	No	Young/SM
There is an undisturbed naturally-vegetated strip of at least 6 m on both sides to protect the line of trees from farming and other human activities (excluding grazing). Where veteran trees are present, root protection areas should follow standing advice2.	Yes	Pasture either side
At least 95% of the trees are in a healthy condition	Yes	No clear signs of

Criteria	Criteria Met?	Notes
(deadwood or veteran features valuable for wildlife are excluded from this). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.		damage or significant health issues from observational cues
Number of Criteria Passed	**3**	**The line of trees is in Moderate Condition**

5. Proposed Design

5.1. Development Impacts

The project involves the temporary siting of cabins within a portion of the site – see Map 03. The remainder of the site will remain unaffected.

The land will be restored to its baseline condition within 2 years. This allows for a year of temporary use for cabins; followed immediate remediation works and a year for the habitat to restore in line with the timeframes assumed for restoration of the sward type within the Metric.

The Statutory Biodiversity Metric - User Guide[6] metric states that temporary habitat losses do not need to be recorded if the habitat is restored to its baseline type and condition within two years (Section 6, p. 34). In such cases, the habitat is treated as "retained," and no biodiversity unit loss is registered.

Map 03 – Showing the proposed habitats present within the redline boundary of the site after restoration within 2 years.

5.2. Restoration Proposals

Following the cessation of the temporary use, all equipment and infrastructure would be removed from site along with any hardcore or similar materials used to facilitate the layout.

6 https://assets.publishing.service.gov.uk/media/65673fee750074000d1dee31/The_Statutory_Biodiversity_Metric_-_Draft_User_Guide.pdf

The design of the site layout would ensure avoidance of compaction beneath the cabins. Upon commencement of restoration works, this would be assessed and confirmed and remedial actions integrated into the restoration plan if necessary.

The grassland to be impacted by the temporary works should be restored to its previous condition by natural regeneration where possible. Sward restoration could be facilitated by ground preparation works followed by spreading of green hay from the adjacent retained sward within the site; or an alternative native, species-rich sward on the islands.

If these locally native seed sources are not available or appropriate, seed mixes should be locally sourced where possible, and tailored to the species native on the islands.

It is recommended that a full restoration plan is conditioned in any consent granted.

5.3. Confidence and Risks

The restoration can be undertaken with a high degree of confidence provided an appropriate restoration plan is created and enacted.

The risk of the project extending beyond the proposed timeframe due to unforeseen circumstances must also be considered. If this were to occur, the full characterisation of the existing baseline presented in this report and the associated metric would allow the scheme performance to be re-assessed. The inclusion of the full site within the redline would provide sufficient scope for onsite enhancements to be enacted to address any biodiversity loss in a way which is compatible with the longer term residential plans consented in P/21/002.

6. Results

6.1. BNG Metric Results

In accordance with the characterisation of the proposed works as 'temporary' as outlined in Section 5.1 above, there would be no change in the biodiversity of the site as measured by the metric.

Table 03 – A summary of the BNG Credits for onsite habitats as a result of the proposals outlined in the scheme. Both Area (A) and Linear (L) credits are detailed in this table for clarity.

Existing Habitat	Baseline Value	Notes	Proposed Value	Net Change
Other Neutral Grassland	0.26 (A)	Temporary Impacts only where cabins are sited	0.26 (A)	0
Other Neutral Grassland	1.51 (A)	No impacts proposed – retained grassland surrounding the cabins	1.51 (A)	0
Tree Line	0.51 (A)	No impacts proposed	0.51 (A)	0
Artificial Unvegetated Surface	0.10 (L)	No impacts proposed	0.10 (L)	0

6.2. Consideration of Net Gain Requirements

6.2.1. Overview

It is considered that, in this instance, an additional 10% net gain above baseline is not required, provided the conditions of full restoration to baseline habitat and condition is achieved within 2 years. This is based on the following interpretation of the Temporary Impacts; *de minimis* Exemption; and definition of impact outlined in the Statutory Biodiversity Metric User Guide and associated DEFRA documentation.

6.2.2. Definition of "Impact"

The User Guide defines impact as a reduction in biodiversity units:

> "*biodiversity units are a proxy for biodiversity and should be treated as relative values*" (Table 4, Principle 5, Section 2, p. 19).

This indicates that the metric operates as a numerical framework rather than a direct ecological assessment. If a development does not cause a decrease in biodiversity units under the metric, then it would follow that no impact has occurred when interpreting subsequent documentation and guidance.

6.2.3. Temporary Habitat Loss and Retention

The User Guide states that temporary habitat losses do not need to be recorded if the habitat is restored to its baseline type and condition within two years

(Section 6, p. 34). In such cases, the habitat is treated as "retained," and no biodiversity unit loss is registered.

6.2.4. Eligibility for the *De Minimis* Exemption

The *de minimis* exemption[7] applies to developments that affect less than 25 square meters of non-priority onsite habitat.

Since the biodiversity metric does not register temporary losses as unit reductions, this development does not affect any habitat according to the output of the metric. Such a scheme would therefore qualify for the *de minimis* exemption as less than 25 square metres of habitat is affected.

6.2.5. Conclusion

- Impact is defined as a reduction in biodiversity units, not an on-the-ground effect;
- Temporary habitat loss (restored within two years) is considered retained and does not count as an impact;
- If a development does not affect (or impact) more than 25 sqm of habitat as measured by the metric, it qualifies for the *de minimis* exemption.

Thus this development would be eligible for the *de minimis* exemption – 10% net gain would not therefore be required.

6.2.6. Additional Context

The site is subject to a planning consent for residential development. The long-term proposals for the site therefore include associated landscaping and ecological enhancement works which would address the overall impacts to the site as a result of development in the absence of any net gains which might be attached to this scheme.

7 https://defraenvironment.blog.gov.uk/2024/01/22/biodiversity-net-gain-what-are-the-exemptions/