



Date	11 November 2022
Client	Countryside Properties Ltd
Site	Land to the south of Henham Road, Elsenham, Essex
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Title	Response to Planning Inspector's comment 14 regarding biodiversity related to Application No: S62A/22/0007

PINS Comment 14

Biodiversity

The application proposes ecological enhancement measures on an additional area of land, edged green on the Site Location Plan and within the ownership of the applicants, approximately 100–200 m to the north-east. The Biodiversity Net Gain Design Stage Report indicates that to ensure the delivery of these ecological features there is a requirement for an appropriate Construction Environmental Management Plan and Landscape and Ecology Management Plan to be in place from design to the operational phase of the development. The report goes on to indicate that a Management Plan would be required for the off-site proposals.

The applicant is requested to confirm that the area identified for off-site ecological enhancement forms part of the planning application and is identified on an appropriate plan as “land edged blue”.

The applicant is requested to indicate what measures are being proposed and how they will be implemented to ensure the ongoing provision and management of the off-site ecological area.

SES Response

This response aims to provide an overview and demonstrate the deliverability of BNG; note however that the eventual strategy will be dependent on detailed ecological, landscaping, drainage, and design/specification measures to be secured at the Reserved Matters stage of planning.

This response should be read in conjunction with the BNG design stage report (SES, August 2022) and accompanying DEFRA 3.1 BNG metric were submitted with the application. These documents contained:

- Detailed methods of BNG process
- Good practice principles for development
- Calculations of baseline habitats and those within the proposed design

Baseline Habitats

A summary of the baseline habitats on and off site is in Table 1 below. Full descriptions and data relating to their condition assessments has been supplied in the design stage report (SES, August 2022) and the condition assessment report for the on-site field (SES, July 2022).

Table 1: Condition assessment scores given to baseline habitats on site

Habitat Parcel	Corresponding Condition Sheet	Score
FA	Grassland - Low distinctiveness	Moderate
T1	Urban Trees	Good
T2	Urban Trees	Moderate
HA	Hedgerows	Moderate
HB	Hedgerows	Moderate
HC	Hedgerows	Moderate
F1	Grassland - Low distinctiveness	Poor
F2	Grassland - Medium/High/Very High Distinctiveness	Poor
F3	Grassland - Medium/High/Very High Distinctiveness	Poor
W1	Woodland	Total = 23; Poor
L1	Line of Trees	Good
D1	Ditches	Poor
H1	Hedgerows	Good
H2	Hedgerows	Good
H3	Hedgerows	Good
H4	Hedgerows	Good
H5	Hedgerows	Good
H6	Hedgerows	Good

Proposed Habitats

Table 2 presents the proposed habitats (both on and off-site) to be delivered in line with the development scheme, and the measures that will be required to be delivered to ensure that target condition scores are met. Table 3 specifically addresses woodland condition criteria to be targeted within a woodland management plan.

Table 2: Proposed habitats and measures to ensure their delivery

Habitat	Proposed Condition	Proposed measures to ensure delivery of target condition	Summary
On-site - created habitats			
Modified grassland	Moderate	1) Grassland sown with a diverse species mix e.g. Emorsgate EM1. 2) Grass cutting on rotation to ensure at least 20% of sward <7cm and 20% >7cm. 3) Regular management to remove scrub and bracken encroachment, and any invasive-non native species	Delivering the proposed measures will pass 5 of 7 condition criteria to achieve moderate condition
Other neutral grassland	Moderate	1) Grassland sown with a diverse species mix to ensure >9 sp. per m2 e.g. Emorsgate EM1. This mix will be targeted to reflect specific UKHab grassland type "neutral grassland/other neutral grassland".* 2) Management to ensure cover of bracken <20% and scrub <5%. 3) Mowing management to ensure varied sward height (>20% <7cm & >20% >7cm)	Delivering the proposed measures will pass 4 of 6 condition criteria (including essential criterion 1) to achieve moderate condition
Traditional orchards	Moderate	1) Control scrub to ensure <5% trees are smothered, and scrub occupies <10% ground cover. 2) Formative/restorative pruning. 3) Management to ensure 95% trees are free from damage 4) Varied sward height (5cm-30cm) and small patches of bare ground present. 5) Underlying grassland sown with a diverse species mix. 6) Management to ensure absence of invasive non-native species, and those indicative of sub-optimal condition make up <10% ground cover	Delivering the proposed measures will pass 6 of 8 criteria (excluding criterion 1) to achieve moderate condition
Artificial unvegetated unsealed surface	N/A	N/A - condition fixed at "other"	N/A
Developed land, sealed surface	N/A	N/A - condition fixed at "other"	N/A
Introduced shrub	Poor	N/A - condition fixed at "poor"	N/A
Vegetated garden	Poor	N/A - condition fixed at "other"	N/A
Urban tree	Moderate	1) Planted trees will be native species. 2) Linear blocks of trees to be planted ensuring gaps in canopy are <10% total area and no one gap is >5m wide. 3) Management to ensure little/no adverse impact on tree health by anthropogenic activities. 4) No regular pruning, so trees retain >75% expected canopy cover for their age	Delivering the proposed measures will pass 3 of 6 criteria to achieve moderate condition
Off-site - enhanced habitats			
Modified grassland	Good	Enhanced from poor to good by: 1) Grassland sown with a diverse species mix e.g. Emorsgate EM1. 2) Grass cutting on rotation to ensure at least 20% of sward <7cm and 20% >7cm. 3) Regular management to remove scrub and bracken encroachment, and any invasive-non native species. 4) Management to ensure that physical damage is evident in less than 5% of total grassland area.	Delivering the proposed measures will pass 6 of 7 condition criteria to achieve moderate condition
Other neutral grassland	Moderate	Enhanced from poor to moderate by: 1) Grassland sown with a diverse species mix to ensure >9 sp. per m2 e.g. Emorsgate EM1. This mix will be targeted to reflect specific UKHab grassland type "neutral grassland/other neutral grassland".* 2) Management to ensure cover of bracken <20% and scrub <5%. 3) Mowing management to ensure varied sward height (>20% <7cm & >20% >7cm)	Delivering the proposed measures will pass 4 of 6 condition criteria (including essential criterion 1) to achieve moderate condition
Other neutral grassland	Good	Enhanced from poor to good by: 1) Grassland sown with a diverse species mix to ensure >9 sp. per m2 e.g. Emorsgate EM1. This mix will be targeted to reflect specific UKHab grassland type "neutral grassland/other neutral grassland".* 2) Management to ensure cover of bracken <20%, scrub <5%, and absence of invasive non-native species. 3) Mowing management to ensure varied sward height (>20% <7cm & >20% >7cm)	Delivering the proposed measures will pass 5 of 6 condition criteria (including essential criterion 1 and 6) to achieve good condition
Wet woodland	Moderate	Measures given in Table 3 below	

* Palatable/productive grasses dominate, usually rye grasses (*Lolium* sp), white clover (*Trifolium repens*) and timothy (*Phleum pratense*) 40% or below and other grasses more prominent such as crested dog's tail (*Cynosurus* sp), common bent (*Agrostis capillaris*), yellow oat grass (*Trisetum flavescens*), soft brome (*Bromus hordeaceus*) and sweet vernal grass (*Anthoxanthum odoratum*). Less modified but wetter situations may support abundant soft rush (*Juncus effusus*) or hard rush (*J.inflexus*), floating sweet grass (*Glyceria fluitans*), creeping bent (*Agrostis stolonifera*), tufted hair-grass (*Deschampsia cespitosa*) and rough meadow grass (*Poa trivialis*). Total grass cover usually between 50 and 75%. Forbs up to 50% cover and associated with less fertile soil e.g. ribwort plantain (*Plantago lanceolata*), sorrel (*Rumex acetosa*), meadow buttercup (*Ranunculus acris*), creeping buttercup (*R. repens*), self-heal (*Prunella vulgaris*), yarrow (*Achillea millefolium*), silverweed (*Potentilla anserina*), marsh thistle (*Cirsium palustre*) and Lady's smock (*Cardamine pratensis*). However, indicators of the two hay meadow Priority habitats will be absent. Moderate number of species (nine-15 per m²). Rye grass and crested dog's tail often abundant.

Table 3: Proposed conditions to be targeted in off-site woodland management plan

Condition Criteria	Description	Baseline condition score (Poor-1/Moderate-2/Good-3)	Proposed score to be achieved with woodland management plan
1	Age distribution of trees	1 – One age class present	1 - Woodland management plan to maintain poor condition*
2	Wild, domestic and feral herbivore damage	1 – Evidence of significant browsing pressure present in 40% or more of woodland	3 - No significant browsing damage evident in woodland
3	Invasive plant species	3 - No invasive species present in woodland	3 - Woodland management plan to maintain good condition
4	Number of native tree species	1 – None to two native tree or shrub species across woodland parcel	3 - Five or more native tree or shrub species across woodland parcel
5	Cover of native tree and shrub specie	3 - >80% canopy trees and understorey shrubs are native	3 - Woodland management plan to maintain good condition
6	Open space within woodland	3 - 10-20% of woodland has areas of temporary open space	3 - Woodland management plan to maintain good condition
7	Woodland regeneration	1 – No classes or coppice regrowth present in woodland	2 - One or two classes present in woodland
8	Tree health	3 - Tree mortality less than 10%. No pests or diseases or crown dieback	3 - Woodland management plan to maintain good condition
9	Vegetation and ground flora	3 – Recognisable NVC plant community present	2 - Woodland management plan to maintain moderate condition
10	Woodland vertical structure	1 – One or less storey across all survey plots	1 - Woodland management plan to maintain poor condition*
11	Veteran trees	1 - No veteran trees present in woodland	1 - Woodland management plan to maintain poor condition*
12	Amount of deadwood	1 – Less than 25% of all survey plots within the woodland parcel have standing deadwood, large dead branches/stems and stumps, or a high abundance of smaller cavities	3 - 50% of all survey plots within woodland parcel have standing deadwood, large dead branches/stems and stumps, or a high abundance of smaller cavities
13	Woodland disturbance	2 – Less than 1 hectare in total of nutrient enrichment across woodland area and/or less than 20% of woodland area has damaged ground	2 - Woodland management plan to maintain moderate condition
Total score		23 - Poor	30 - Moderate

**It is not considered practical to increase this condition score through a woodland management plan*

Ecology, Countryside Management

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Notes on Deliverability

The off-site provision is centered on land including three grass fields, a small woodland, a section of Stanstead Brook and associated boundary features. This collection of habitats is in-keeping with the local character area of South Suffolk/North Essex Clayland; incorporating an area of gently undulating landscape with a mix of species rich hedgerows and woodlands with meadows and streams, and irregular field patterns. The off-site enhancement plan will retain these characteristics and focus on creating biodiverse areas that are more sympathetically managed over a 30 year period to enable a richer structure and botanical diversity.

The aims and objectives for created/enhanced habitats, both on and off-site, are to be incorporated into a management plan for the site. This will take the form of several documents including a Construction Environmental Management Plan (CEMP) for the site, a Landscape Ecological Management Plan (LEMP) for both the site and the off-site area, and a Woodland Management Plan for the off-site area. These will clearly set out the following:

- Description and evaluation of features to be managed.
- Ecological trends and constraints on site that might influence management.
- Aims and objectives of management.
- Appropriate management options for achieving aims and objectives.
- Detailed prescriptions for management actions.
- Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- Details of the body or organisation responsible for implementation of the plan
- Ongoing monitoring and remedial measures.

References

CIEEM (July 2021) Biodiversity Net Gain Report and Audit Templates, Chartered Institute of Ecology and Environmental Management, Winchester, UK

Southern Ecological Solutions (August, 2022). Biodiversity Net Gain Design Stage Report, Henham Road, Elsenham. Unpublished.

Southern Ecological Solutions (July, 2022). Condition Assessment for the on-site field at Henham Road, Elsenham. Unpublished.