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Biodiversity Net Gain Design Stage Report – Statutory Biodiversity Metric

Site:

Builder's Yard, Racket Town Road, Tresco,
Isles of Scilly

Grid Reference: SV 8950 1505

16th July 2025

Plan for Ecology Ltd
Tremough Innovation Centre
Tremough Campus, Penryn, Cornwall, TR10 9TA
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Document Control:

Site Name:	Tresco Builders Yard, Tresco, Isles of Scilly TR24 0PX
OS Grid Reference:	SV 8950 1505
Report Author:	Nicola Dyer BSc (Hons) MSc MCIEEM
Document Approved By:	Dr Lucy Wright BSc (Hons) MSc PhD MCIEEM
Client:	Treso Island Ltd
Report Reference Number:	P4E3845
Version:	01
Date:	16th July 2025

Declaration:

"The information, evidence and advice, which we have prepared and provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology & Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions."

Lucy Wright	[redacted]
Nicola Dyer	

Report Lifespan:

Ecological features can change over time, particularly if site management/ use changes. Typically, this Biodiversity Design Stage Report is valid for 12 months from the date of the baseline habitat survey on which the calculations are based (until 14th May 2026). However, the report may be valid for longer if the baseline habitat data is not uplifted in value in the interim.

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1.0 Introduction

1.1 Background & Purpose of Survey

Biodiversity Net Gain (BNG) is an approach to development and/or land management that aims to leave the natural environment in a measurably better state than it was beforehand. BNG is measured using a Biodiversity Metric which calculates the number of biodiversity units present on a site before and after development and compares these figures to determine the % net losses and gains.

On 12th February 2024 the Environment Act 2021 became law, requiring all eligible developments to provide 10% BNG measured using the Statutory Biodiversity Metric (DEFRA, 2024).

Plan for Ecology Ltd was commissioned by Tresco Island Ltd to undertake a BNG assessment of a proposed development project at a builder's yard off Racket Town Road, Tresco (OS Grid Ref: SV 8950 1505) in May 2025. The assessment included a BNG Design Stage Report and a completed Statutory Biodiversity Metric to demonstrate how the 10% BNG will be achieved.

1.2 Objectives

This BNG Design Stage Report was prepared in accordance with current guidance on BNG reporting (CIEEM, 2021) and should be read in conjunction with the Ecological Impact Assessment report for the site (Plan for Ecology Ltd, 2025). The aims of this report are to:

- Describe the proposed development site and its planning background.
- Identify the planning policies, legislation and guidance which inform the BNG assessment.
- Describe the baseline condition of the site, the survey methods applied to establish this baseline and any limitations or refer the reader to the documents in which this information is presented.
- Describe the proposed development and how the design layout and landscaping plans have aimed to maximise the delivery of on-site BNG.
- Use the Statutory Biodiversity Metric calculations to identify the % BNG for habitats, hedges and watercourses (where relevant to the site).
- If the development is unable to deliver at least 10% BNG on-site (i.e., a net gain), identify a mechanism through which offsite BNG will be provided in order to meet this target.

1.3 Site Location & Description

The application site, measuring *c.* 0.62 ha, comprises land within the red line boundary shown on Figure 1 below. The site is located in the centre of the island of Tresco, *c.* 0.5km east of New Grimsby Harbour and *c.* 0.72km north of Treso Abbey. Tresco is the second largest island in the Isles of Scilly archipelago, which is a group of *c.* 200 islands and rocky outcrops located *c.* 45km southwest of Land's End, Cornwall, United Kingdom.

The application site comprises a storage yard with vegetated margins that is used for building materials and equipment, and garden waste. It is located within an area designated as a 'National Landscape', formally referred to as 'An Area of Outstanding Natural Beauty' (AONB). Beyond the immediate red line planning boundary, the site is bordered by woodland to the north and east, a track to the south, beyond which there is more woodland, and Racket Town Road to the west. The coast lies *c.* 0.49km to the east at its nearest point.

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Figure 1: Site location - approximate red line boundary.

1.4 Proposed Site Plans

The applicant seeks planning consent to construct a steel-framed barn to store building machinery and materials within the yard. The structure will be timber-clad with a pitched roof covered with timber cement sheeting. It will be located in the eastern part of the application site with a footprint of approximately 380m^2. The barn will be accessed off the existing track through the site (Llewelyn Harker Lowe, 2025). An indicative site layout is shown in Figure 2 below.

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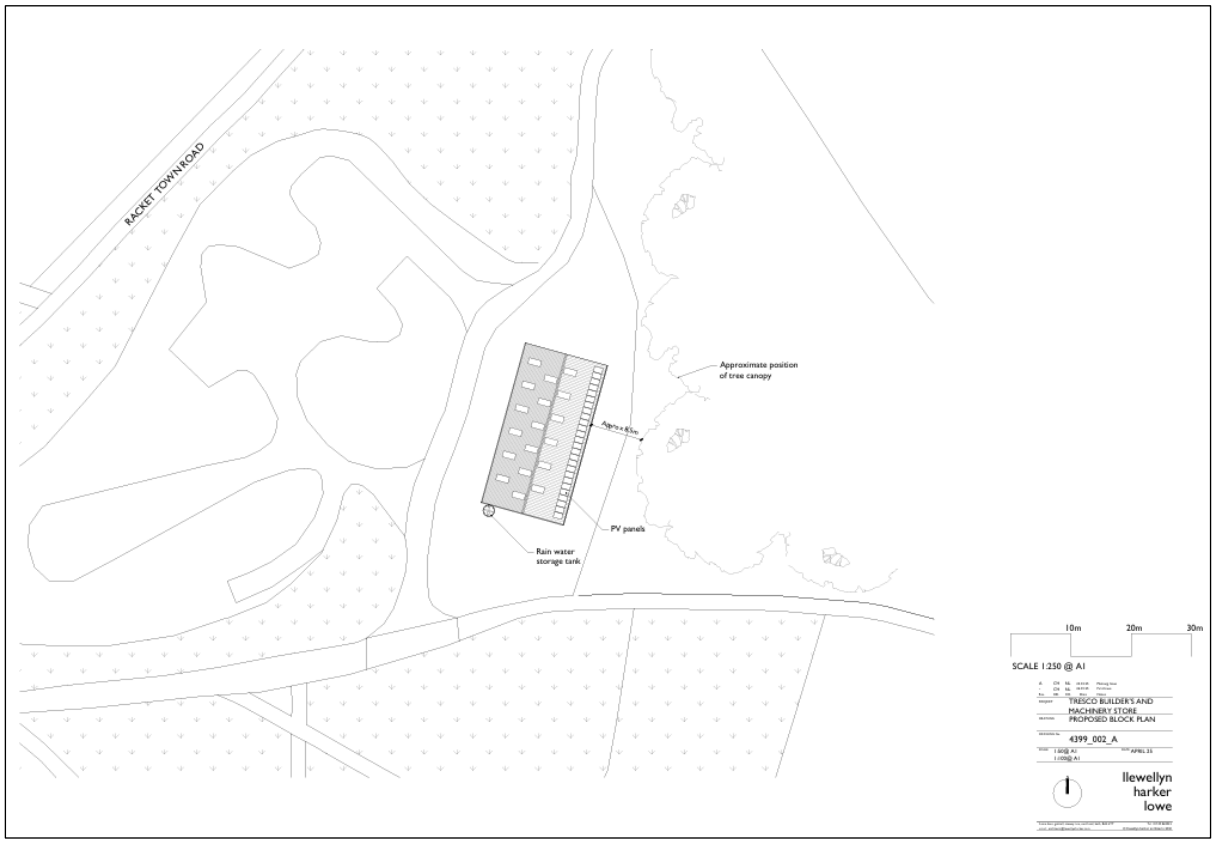

Figure 2. Indicative layout (Llewellyn Harker Lowe, 2025; drawing no. 4399_002_A).

1.5 Project Administration

Site Name:	Builder's Yard, Racket Town Road, Tresco, Isles of Scilly, TR24 0PX
OS Grid Reference:	SV 8950 1505
Client:	Tresco Island Ltd
Planning Authority:	Council of the Isles of Scilly
Report Reference Number:	P4E3845
Site proposals:	The applicant seeks planning consent to construct a storage facility for building materials and machinery within an existing yard.
Survey Date:	14th May 2025 (Phase 1 survey, including UK Habitat (UKHab) Classification, and Statutory Biodiversity Metric habitat condition assessment)
Surveyors & Licence Numbers:	Nicola Dyer BSc (Hons) MSc MCIEEM (Bat licence no: 2019-40845-CLS-CLS)

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2.0 BNG Policy & Legislation

The following planning, legislative and professional guidance documents have been considered in the preparation of this BNG assessment. Further information is provided at Appendix 1.

Baker, J., Hoskin, R. and Butterworth, T. (2019) Biodiversity Net Gain. Good Practice Principles for Development. A Practical Guide. CIRIA, 2019. ISBN: 978-0-86017-791-3.

BSI (2013) BS 42020: 2013 Biodiversity: Code of Practice for Planning and Development. BSI.

BSI (2021) BS 8683: 2021 Process for Designing and Implementing BNG. BSI.

CIEEM [Chartered Institute of Ecology and Environmental Management] (2024) Guidelines for Ecological Impact Assessment in the United Kingdom and Ireland. CIEEM.

CIRIA (2019). Biodiversity Net Gain. Good Practice Principles for Development. Part A: A Practical Guide. Baker, J. Hoskin, R and Butterworth, T. Joint collaborative report by CIEEM, IEMA and CIRIA. https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development/

Cornwall Council and Council of the Isles of Scilly (2021) Cornwall and Isles of Scilly Environmental Growth Strategy 2020-2065. Cornwall Council. Truro.

Council of the Isles of Scilly (2021) Isles of Scilly Local Plan 2015–2030. Council of the Isles of Scilly, St Mary's, Isles of Scilly.

Council of The Isles of Scilly (2008) The Isles of Scilly Supplementary Planning Document. Biodiversity and Geological Conservation. December 2008. Isles of Scilly Biodiversity & Geodiversity SPD.pdf

Department for Food, Environment and Rural Affairs (2024) Statutory Biodiversity Metric. Statutory biodiversity metric tools and guides - GOV.UK (www.gov.uk)

HM Government (2006) The Natural Environment and Rural Communities Act 2006. HMSO, London.

HM Government (2021) The Environment Act 2021. HMSO, London.

Ministry of Housing, Communities and Local Government (2025) National Planning Policy Framework National Planning Policy Framework - Guidance - GOV.UK

3.0 Methodology

This BNG assessment has been carried out in accordance with BS42020-2013 Biodiversity – Code of Practice for Planning & Development (BSI, 2013) and BS8683:2021 Process for Designing and Importing Biodiversity Net Gain (BSI, 2021), as adopted by local planning authorities, and the Statutory Biodiversity Metric guidance (DEFRA, 2024). Further information about wildlife legislation and policies relating to BNG is provided in Appendix 1.

3.1 Approach to BNG

Mandatory biodiversity net gain, as set out in the recently mandated Environment Act 2021, became law on 12th February 2024. The Environment Act 2021 requires all developments to achieve a minimum 10% BNG. All developments must quantify and describe habitat loss using the Biodiversity Metric (DEFRA, 2024), and achieve a minimum 10% BNG.

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BNG is calculated using the Statutory Biodiversity Metric that measures the pre- and post-development biodiversity value of the site based on the area and characteristics of the habitat(s) present/ lost, and the area and characteristics of the habitat(s) reinstated.

3.2 BNG – Good practice principles for development

This BNG assessment has been completed using the ten good practice principles for development (CIRIA, 2019). These are as follows:

Principle 1. Apply the Mitigation Hierarchy – '*do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided*'.

Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere – '*Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain*'.

Principle 3. Be inclusive and equitable – *'Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible, and share the benefits fairly among stakeholders'*.

Principle 4. Address risks – '*Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised*'.

Principle 5. Make a measurable Net Gain contribution – *'Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities'.*

Principle 6. Achieve the best outcomes for biodiversity – *'Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly-justified choices when 1) delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses; 2) compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation; 3) achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels; 4) enhancing existing or creating new habitat; and 5) enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity'*.

Principle 7. Be additional – *'achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway)'*.

Principle 8. Create a Net Gain legacy – *'ensure Net Gain generates long-term benefits by: 1) engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity; 2) planning for adaptive management and securing dedicated funding for long-term management; 3) designing Net Gain for biodiversity to be resilient to external factors, especially climate change; 4) mitigating risks from other land uses; 5) avoiding displacing harmful activities from one location to another; and 6) supporting local-level management of Net Gain activities'*.

Principle 9. Optimise sustainability – *'prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy'*.

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Principle 10. Be transparent – *'communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders'*.

3.3 Assessment of Baseline Biodiversity Value

The ecological baseline value of the site was assessed using the following information:

- A desk study of ecological records provided by the Local Records Centre (within Plan for Ecology Ltd, 2025);
- A web-based search for designated wildlife sites using MAGIC http://www.magic.gov.uk (DEFRA *et al*, 2025);
- An extended Phase 1 Survey of the site on 14th May 2025 (Plan for Ecology Ltd, 2025) to classify habitats according to the UK Habitat Classification system (UKHab Ltd, 2023).
- An assessment of habitat condition according to the Statutory Biodiversity Metric condition criteria (DEFRA, 2024).

Baseline habitats were mapped and measured using QGIS. NB. No hedgerows or watercourses are present within the site pre-development.

3.4 Assessment of Post-Development Biodiversity Value

The Ecological Impact Assessment report provides recommendations for habitat retention, enhancement and creation within the site, post-development (Plan for Ecology Ltd, 2025). These recommendations are guided by the Mitigation Hierarchy (BSI, 2013; CIEEM, 2024). The Mitigation Hierarchy seeks to avoid impacts, then to mitigate unavoidable impacts, and, as a last resort, to compensate for residual impacts that remain after implementation of avoidance and mitigation measures.

The predicted BNG resulting from the implementation of these measures is modelled using the Statutory Biodiversity Metric (DEFRA, 2024). The predicted habitat condition of post-development habitats was assessed by applying professional judgement, based on location, habitat type, time to target condition and likely management/impacts over a 30-year period.

The site layout plan provided the basis for mapping and measuring the post-development habitats (Figure 2). NB. No hedgerows or watercourses will be present within the site post-development.

3.5 Statutory Biodiversity Metric

The Statutory Biodiversity Metric was used to calculate the pre- and post-development biodiversity units of the site based on the area and characteristics of the existing baseline habitats, and the area and characteristics of habitats retained, enhanced and created as a result of the development (DEFRA, 2024). The Statutory Biodiversity Metric calculates the biodiversity units for habitats (measured in hectares), and hedges and watercourses (measured in linear kilometers) separately and a 10% BNG is required in each category that is relevant to the site. A completed Statutory Biodiversity Metric Excel spreadsheet accompanies this document.

The biodiversity unit scores are moderated by incorporating measurements of habitat condition, location (i.e. some locations are considered less favourable than others), difficulty associated with implementing new habitat features (i.e. some habitats are more difficult to establish successfully than others), and strategic significance (see section 3.6 below).

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3.6 Strategic Significance

The strategic significance of each habitat feature is determined using the Cornwall and Isles of Scilly Nature Recovery Strategy interactive mapping CIOS LNRS (accessed 14th May 2025).

This identifies habitats that fall into Zones 1 and 2 of the Cornwall and Isles of Scilly Nature Recovery Network. Those habitat features that fall within Zone 1: Existing Nature Network and Zone 2: Opportunity Area, are categorised as Category 1 (within area formally identified in the local strategy) in accordance with Table 1 below (DEFRA, 2024). Those features that do not fall within Zones 1 and 2 are categorised as Category 3 'area/ compensation not ecologically desirable/ in local strategy'. In some instances, single habitat features sit partially within or outside of Zones 1 and 2. Where habitats straddle Net Gain Zones, the habitat parcel has been split to fit the appropriate Net Gain Zone, where possible.

Strategic significance is determined as outlined by DEFRA and summarised in Table 1 below.

Table 1. Strategic significance where a Local Nature Recovery Strategy (LNRS) has been published.

Strategic Significance Category	Score Applied	Description
Category 1 - High 'within area formally identified in the local strategy'	1.15	This category can be applied when: • the location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and • the intervention is consistent with the potential measure proposed for that location. If your project delivers the mapped potential measure set out in the LNRS you should: • record strategic significance as low in the baseline • record strategic significance as high in post-intervention sheets • record that you have applied the published LNRS in your gain plan
Category 2 - Medium 'location ecologically desirable but not in local strategy'	1.10	This category cannot be applied.
Category 3 - Low 'area/ compensation not ecologically desirable/ in local strategy'	1	Where the definitions for high strategic significance are not met. Even if your project is in an area mapped with a potential measure, if it does not deliver the specific actions outlined for your location you should record strategic significance as low.

Habitat features in the application site lie within Zone 2 of the CIOS LNRS network and are categorised as 'within the local strategy'. The LNRS identifies that the site offers opportunities for the creation and enhancement of 'Trees, woodland and scrub' (Figure 3).

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Figure 3: Biodiversity Net Gain Zones falling within the site (Cornwall and Isles of Scilly LNRS; accessed 14th May 2025). Approximate site location shown within red line.

3.7 Development Revisions

No development revisions were required to achieve BNG.

3.8 Technical Competence

This report has been written by Nicola Dyer BSc (Hons) MSc MCIEEM who holds the following protected species licences: Bat licence no: 2019-40845-CLS-CLS. Nicola has over 30 years of experience as an ecological consultant. She is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and has an Honours Degree in Environmental Science and a Master's Degree in Environmental Impact Assessment. Nicola has undertaken CIEEM training courses relevant to BNG and is experienced and competent in Biodiversity Net Gain assessments.

3.9 Limitations

Survey limitations

It is possible to undertake UKHab surveys at any time of year. The survey was completed on 14th May 2025, within the optimal period for vegetation surveys (April – September). It is acknowledged that some species may not have been visible or readily identifiable at this time of year but timing of the survey was not considered to be a significant limitation to habitat classification or the Statutory Biodiversity Metric habitat condition assessment.

Weather conditions during the survey were in line with seasonal norms and there are no limitations.

Dense vegetation associated with scrub and tall forb habitats has some potential to obscure features of ecological importance.

Where habitat boundaries could not be defined during the survey due to access restrictions e.g. dense scrub along the eastern site boundary, they were mapped with the aid of satellite photography (Google Earth Pro, 2025).

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Ecological features can change over time, particularly if site management/ use changes. Typically, this Biodiversity Metric is valid for 12 months (until 14th May 2026) in line with the survey lifespan of the baseline habitat survey on which the calculations are based. However, providing that the baseline is the best representation of pre-development habitats on the site, then the validity of the metric can be extended for longer than 12 months.

Biodiversity Metric limitations

Natural England has identified the following limitations of the Biodiversity Metric (Natural England, 2022); these are considered to also apply to the Statutory Metric.

'The metric uses habitats as a proxy for biodiversity. Although this is a rational means of measuring biodiversity value, it is a simplification of complex ecological processes which are not readily captured. While the scoring of habitats is informed by ecological reasoning and the available evidence, the outputs of biodiversity unit calculations are not scientifically precise or absolute values. Therefore, the generated biodiversity unit scores are a proxy for the relative biodiversity worth of a habitat or site. This is appropriate for a variety of intended uses, but there may be exceptional circumstances where use of the metric is not appropriate.

The metric and its outputs should therefore be interpreted, alongside ecological expertise and common sense, as an element of the evidence that informs plans and decisions. The metric is not a total solution to biodiversity decisions. It can, for example, help you work out how much new or restored habitat is needed and in what condition to compensate for a loss of habitat, but it does not tell you the appropriate composition of plant species to use or which micro-habitats might benefit locally important species'.

The Statutory Biodiversity Metric requires habitat areas to be provided as hectares (or kilometres for linear features). On small sites or where some habitat features are very small (i.e. <150m^2 or 8m length), accurately calculating net change is more difficult because the margin of error is amplified. Minor losses of hedgerow (<10m) are inflated by the metric such that their inclusion can be inaccurate representation of ecological reality.

The Biodiversity Metric Excel spreadsheet presents values in two decimal places, but the calculations behind the presented values have more than two decimal places, which can result in small deviations in reported values.

Where present, hedgerows and watercourses are measured as linear features (Km) in the Statutory Biodiversity Metric and are not attributed an area (Ha). In line with BNG guidance, habitats adjacent to hedges and watercourses are expanded to fill the area occupied by linear features to ensure that the total area of the site is accurate.

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4.0 Baseline Biodiversity Value – Survey Results

The baseline biodiversity of the site is informed by the EcIA, the UKHab survey and the Statutory Biodiversity Metric habitat condition assessment. Further information about designated sites, habitats and species relevant to the application site is provided in the EcIA (Plan for Ecology Ltd, 2025).

4.1 Designated sites

No part of the application site lies within a designated wildlife site, however, the site is located within an area designated as a 'National Landscape', formally referred to as 'An Area of Outstanding Natural Beauty' (AONB).

Several statutory designated sites are present within a 1km radius of the site. A detailed description is provided in Table 2 of the EcIA (Plan for Ecology Ltd, 2025). The application site lies within a Site of Special Scientific Interest (SSSI) Impact Risk Zone and within the Zone of Influence (12.5 km radius) of three European sites. There are no non-statutory designated sites within a 1km radius of the site.

4.2 Habitats

A total of six UK Habitat Classification (UKHab) habitat types (inclusive of notable secondary codes) were recorded within the site during the site visit. These are listed below and a detailed description is provided in Table 4 of the EcIA (Plan for Ecology Ltd, 2025):

- Mixed scrub (h3h 524);
- Tall forbs (g 16 82 523 524);
- Sparsely vegetated urban land (u1f);
- Bare ground (u 510);
- Developed land, sealed surface (u1b);
- Standing water; artificial (r 49).

There are no habitats of significant ecological value on the site. The mixed scrub and tall forbs habitats are of value within the Zone of Influence of the application site and the remaining habitats are of negligible value.

4.3 Notable species

The site supports or has the potential to support the following legally protected species and species of conservation concern:

- Bats (foraging and commuting)
- Red squirrel
- Lesser white toothed shrew
- Birds (breeding and wintering)
- Amphibians
- Invertebrates
- Vascular and non-vascular plants.

Further species descriptions are provided in Table 5 of the EcIA (Plan for Ecology Ltd, 2025). The site is considered to be of value within the Zone of Influence of the application site for these species groups. No further species surveys were required to inform the planning application.

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5.0 Potential Impacts and Mitigation

5.1 Potential Impacts

The potential impacts that the development will have on designated sites, habitats and species, in the absence of mitigation and compensation, are described in Table 2 below.

Ecological features considered to be of at least Local Value are assessed in Table 2. Those features considered to be of less than Local Value are not considered in the impact assessment unless legislative constraints must be navigated to prevent an offence being committed under the relevant wildlife legislation.

5.2 Mitigation

The Mitigation Hierarchy has been applied to each potential impact to avoid, reduce or compensate that impact (Table 2). Following mitigation and compensation, the proposed development will have a neutral residual impact within the Zone of Influence of the development (Plan for Ecology Ltd, 2025).

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Table 2: Impact Assessment: Assessment of Effects and Mitigation Measures.

Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
Designated Sites				
MCZ - South of the Isles of Scilly	**Construction Phase:** The MCZ is located *c.* 1km northeast of the proposed development site and is not linked hydrologically. Therefore, construction activities, such as increased human activity, vehicle movements, noise, vibration, dust and lighting, will not have any direct impact.	Neutral	Mitigation is not required, but a Construction and Environmental Management Plan (CEMP) will be prepared and implemented, to include actions taken to avoid/ minimise the impacts of construction noise, vibration, dust, lighting and surface runoff on habitats and species.	Neutral
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no operational impacts due to distance of separation.	Neutral	Mitigation is not required.	Neutral
RAMSAR - Isles of Scilly	**Construction Phase:** The RAMSAR site is located *c.* 365m northeast of the proposed development site and is not linked hydrologically. Construction activities will, therefore, not have any direct impact.	Neutral	Mitigation is not required, but CEMP to be prepared and implemented.	Neutral
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no	Neutral	None required.	Neutral

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Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
	operational impacts due to distance separation.			
SAC - Isles of Scilly Complex	**Construction Phase:** The SAC is located *c.* 365m northeast of the proposed development site and is not linked hydrologically. Construction activities will, therefore, not have any direct impact.	Neutral	Mitigation is not required, but CEMP to be prepared and implemented.	Neutral
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no operational impacts due to distance separation.	Neutral	None required.	Neutral
pSPA - Isles of Scilly	**Construction Phase:** The pSPA is located *c.* 365m northeast of the proposed development site and is not linked hydrologically. Construction activities will, therefore, not have any direct impact.	Neutral	None required, but CEMP to be prepared and implemented.	Neutral
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no	Neutral	Mitigation is not required.	Neutral

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Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
	operational impacts due to distance separation.			
SSSI - Pentle Bay, Merrick and Round Islands	**Construction Phase:** This SSSI is located *c.* 365m northeast of the proposed development site and is not linked hydrologically. Construction activities will, therefore, not have any direct impact.	Neutral	Mitigation is not required, but CEMP to be prepared and implemented.	Neutral
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no operational impacts due to distance separation.	Neutral	Mitigation is not required	Neutral
SSSI - Great Pool	**Construction Phase:** This SSSI is located *c.* 320m southwest of the proposed development site and is not linked hydrologically. Construction activities will, therefore, not have any direct impact.	Neutral	None required, but CEMP to be prepared and implemented.	Neutral
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no operational impacts due to distance separation.	Neutral	Mitigation is not required.	Neutral

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Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
SSSI - St. Helen's (With Northwethel & Men-A-Vaur)	**Construction Phase:** This SSSI is located *c.* 893m northeast of the proposed development site and is not linked hydrologically. Construction activities will, therefore, not have any direct impact.	Neutral	None required, but CEMP to be prepared and implemented.	Neutral
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no operational impacts due to distance separation.	Neutral	Mitigation is not required.	Neutral
CIOS LNRS	**Construction Phase:** The site lies in Zones 2 of the CIOS LNRS network and is categorised as identified as an opportunity area for trees, woodland and scrub. The proposed barn is located on an area of sparsely vegetated land and there will be no loss of scrub. However, construction activities, such as increased human activity, vehicle movements, noise, vibration, dust and lighting, could degrade adjacent scrub and other habitats.	Short-term, negative impact of unlikely occurrence, of minor significance on a local scale.	A CEMP will be prepared and implemented, to include actions taken to avoid/ minimise the impacts of construction noise, vibration, dust, lighting and surface runoff on habitats and species.	Neutral
	Operational Phase: Once the barn is operational, there will be no further loss and degradation of	Neutral	Mitigation is not required.	Neutral

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Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
	the LNRS network associated with the development. No external lighting on the barn or in the wider site is proposed.			
Habitats				
There are no habitats of Local value or above within the site. No mitigation is required for low value ecological features but it is recommended that the following measures are undertaken as best practice. Retaining and enhancing existing habitats will also contribute towards achieving Biodiversity Net Gain (see section 7.2).				
Mixed scrub and Tall forbs	**Construction Phase:** The barn is located on the existing yard which is sparsely vegetated land of negligible value. Access to the construction area will be via the existing track. Very little vegetation will be removed during site clearance. Scrub and tall forb habitat will be retained but could become degraded during the construction works.	Short-term, negative impact of unlikely occurrence, of minor significance within the Zone of Influence	Mitigation is not required, but CEMP to be prepared and implemented. It is recommended that retained scrub and tall forb habitats in the immediate vicinity of the construction area are protected with temporary fencing during the works.	Neutral
	Operational Phase: Once the barn is operational, there will be no further loss and degradation of habitats in the LNRS network associated with the development. No external lighting on the barn or in the wider site is proposed.	Neutral	Mitigation is not required.	Neutral

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Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
Species				
The site has no potential to support species/species groups of Local value or above. No mitigation is required for low value ecological features but it is recommended that the following measures are undertaken as best practice and to fulfil legal obligations relating to species protection.				
Bats (foraging and commuting)	**Construction Phase:** The barn will be located on sparsely vegetated land that has limited value for foraging/commuting bats and negative impacts are unlikely. Artificial lighting used to extend working hours during the construction period has potential to disrupt bat activity.	Short-term, negative impact of unlikely occurrence, of minor significance within the Zone of Influence	A Construction and Environmental Management Plan (CEMP) will be prepared and implemented, to include actions taken to avoid/ minimise the impacts of construction noise, vibration, dust, lighting and surface runoff on habitats and species. Where night working is essential, light spill will be screened / deflected with the use of baffles / cowls and directed away from retained vegetation. Follow recommendations for habitat mitigation and enhancement.	Neutral
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no operational impacts on foraging and commuting bats. There are no proposals for external lighting on the barn or in the wider site.	Neutral	No mitigation is required. If the proposals change and external lighting is planned, no further bat surveys are recommended due to the small size and low value of the site for bats, but a lighting plan will be required. The plan will be designed in consultation with a bat ecologist to demonstrate how impacts of artificial lighting on	Neutral

Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
			foraging and commuting bats will be avoided. The lighting plan will comply with the following: Guidance Note 08/23 Bats and Artificial Lighting at night (ILP / BCT, 2023).	
Birds	**Construction Phase:** The barn will be located on sparsely vegetated land that has limited value for foraging birds. Construction works could cause disturbance to birds breeding in the surrounding scrub habitats. The construction area borders scrub to the south and west. If any shrubs have to be cut back along the margins, active nests may be damaged or destroyed, which is a legal offence.	Short-term, negative impact of unlikely occurrence, of minor significance within the Zone of Influence	A CEMP will be prepared and implemented to minimise noise, vibration and human activity that could cause disturbance. Precautionary measures will be implemented to prevent disturbance to nesting birds. Shrub works will be avoided between March and August when birds will be nesting, or, alternatively, the works will be preceded by a detailed search for nesting birds, to be undertaken by an ecologist. If an active bird nest is found, then works must be delayed until nesting activity has ceased / the dependent young have fledged. Works are most likely to be delayed during the peak nesting period between April and June. Follow recommendations for habitat mitigation above.	Neutral
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no	Neutral	Mitigation is not required.	Neutral

Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
	operational impacts on breeding and foraging birds. There are no proposals for external lighting on the barn or in the wider site.			
Invertebrates	**Construction Phase:** Site clearance and disturbance to adjacent habitats has potential to kill, harm or injure individual animals but is unlikely to impact species populations. The desk study revealed records for two introduced, invasive flatworm species (*Australoplana sanguinea* and *Kontikia andersoni*) listed on Sch. 9 Pt. 1 Wildlife and Countryside Act 1981. Construction activities have potential to cause these species to spread, which would be an offence.	Short-term, negative impact of unlikely occurrence, of minor significance within the Zone of Influence	A CEMP will be prepared and implemented. An Invasive Species Control Plan (ISCP) must be prepared and implemented to prevent an offence being committed.	Neutral
	Operational Phase: There will be no further impacts on invertebrates once the barn is operational.	Neutral	No mitigation is required but follow best practice and continue to control invasive species in the long-term to prevent them spreading off-site.	Neutral
Lesser white toothed shrew	**Construction Phase:** Site clearance, including removal of building materials from the construction area, has potential to kill, harm or injure individual animals but is unlikely to significantly impact the local population.	Short-term, negative impact of unlikely occurrence, of minor significance within the Zone of Influence	A CEMP will be prepared and implemented to include precautionary measures to minimise the risk of harming lesser white-toothed shrew. Building materials will be cleared from the existing	Neutral

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Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
			yard carefully to avoid injury to small mammals and other wildlife. Follow recommendations for habitat mitigation above.	
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no operational impacts on lesser white-toothed shrew as a result of the development.	Neutral	Mitigation is not required.	Neutral
Red squirrel	**Construction Phase:** Woodland is absent from the site, and red squirrels are unlikely to occupy the site but may pass through on occasion. Site clearance has very limited potential to kill, harm or injure individual animals. A precautionary approach is required to be confident that a legal offence is not committed.	Short-term, negative impact of unlikely occurrence, of minor significance within the Zone of Influence	A Construction and Environmental Management Plan (CEMP) will be prepared and implemented. A method statement will be required to ensure that works do not impact red squirrel. The method statement will set out detailed avoidance and mitigation measures that will be implemented to prevent an offence being committed under the relevant legislation.	Neutral
	Operational Phase: The site is already used to store machinery and materials. Once the barn is in use, there will be no operational impacts on red squirrel as a result of the development.	Neutral	Mitigation is not required.	Neutral

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Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
Vascular plants	**Construction Phase:** Some vegetation will be lost from the sparsely vegetated land to construct the barn but this is unlikely to significantly affect plant populations. Construction works will not impact any species of conservation value. The Nationally Scarce balm-leaved figwort and round-leaved mint are located in tall forbs habitat. However, it is possible that notable plants may colonise the construction area prior to commencement of works. Construction works could have indirect impacts on plant populations from dust and surface water runoff. Three invasive species listed under Sch. 9 WCA 1981 were recorded on-site: montbretia, rhododendron and giant gunnera. Rhododendron is present in scrub immediately adjacent to the construction area and invasive plants may colonise the construction area in the interim period between the site surveys and commencement of works. Construction activities may cause this species to spread to the wild. Three plant species listed under the Weeds Act 1959 are present within the	Short-term, negative impact of unlikely occurrence, of minor significance within the Zone of Influence	A CEMP will be prepared and implemented. A site walkover survey will be completed within 6 weeks prior to vegetation clearance works to check for the presence of notable plant species. If any nationally rare or scarce plants are found, a method statement will be provided to translocate the plants (or soils likely containing their seedbank) to undisturbed or newly landscaped areas of the site. Retained habitats in the immediate vicinity of the construction area will be protected from degradation with fencing. This will avoid impacting any Nationally Scarce plants in the surrounding vegetation. An Invasive Species Control Plan (ISCP) must be prepared and implemented to prevent an offence being committed. A site walkover survey completed within 6 weeks prior to vegetation clearance works to check for the presence of invasive plant species. Development of the site will include measures to control species under the Weeds Act 1959. Control	Neutral

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Feature	Potential Impacts Without Mitigation	Impact Assessment without Mitigation	Mitigation Measures	Residual Impact
	site: broad-leaved dock, creeping thistle and spear thistle. Construction activities have potential to cause these species to spread which may be harmful to agriculture.		measures will comprise targeted weed control (i.e. seasonal mowing, pulling or herbicide application).	
	Operational Phase: There will be no further impacts on vascular plants once the barn is operational.	Neutral	No mitigation is required but follow best practice and continue to control invasive plants in the long-term to prevent them spreading off-site.	Neutral
Non-vascular plants and fungi	**Construction Phase:** Some vegetation will be lost from the sparsely vegetated land to construct the barn but this is unlikely to significantly affect plant populations. Construction works could have indirect impacts on plant populations from dust and surface water runoff.	Neutral	A CEMP will be prepared and implemented. No further mitigation is required.	Neutral
	Operational Phase: There will be no further impacts on non-vascular plants and fungi once the barn is operational.	Neutral	No mitigation is required but follow best practice and continue to control invasive plants in the long-term to prevent them spreading off-site.	Neutral

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6.0 Ecological enhancements

Biodiversity enhancements that are additional to the mitigation and compensation measures will be included in the development to deliver a Biodiversity Net Gain (Table 3).

Table 3. Ecological Enhancements

Feature	Enhancement Measure
Designations	
CIOS LNRS	There is opportunity to enhance and create new habitats within the wider area to enhance the CIOS LNRS network. The Network identifies that the site offers opportunities for the creation and enhancement of 'Trees, woodland and scrub'.
Habitats	
Scattered trees	Ten native trees will be planted within the site to contribute to the BNG for habitat units post-development.
Mixed scrub	The development will include long-term management of the existing scrub along the eastern boundary and new tree and shrub planting to provide biodiversity improvements and contribute to the BNG for habitat units post-development.
Other neutral grassland	There is scope to enhance tall forb habitat around the periphery of the site to attain more species-rich neutral grassland and contribute to BNG.
Species	
Bats (roosting)	At least one bat box will be installed on the new barn to enhance roosting opportunities.
Birds	At least one bird box will be installed on the new barn to create new nesting opportunity for bird species post-development. Nectar and berry producing species will be planted within the mixed scrub to maximise its value for faunal species.
Invertebrates	A bee post and log pile will be installed within landscaped parts of the site post-development. Nectar and berry producing species will be planted within the mixed scrub to maximise its value for faunal species.
Lesser white-toothed shrew	Log piles will be installed within landscaped parts of the site post-development. Nectar and berry producing species will be planted within the mixed scrub to maximise its value for faunal species.
Vascular plants, non-vascular plants and fungi	Habitat enhancements will include native tree and shrub planting and control of non-native invasive plants that will enhance the diversity and abundance of native plant species.

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7.0 BNG Good Practice Principles

The ten BNG good practice principles are identified in 'Biodiversity Net Gain. Good Practice Principles for Development. Part A: A Practical Guide' by CIRIA (2019). This chapter describes how the principles have been considered and applied within the proposed development (Table 4).

Table 4: Evidence of Compliance with BNG Good Practice Principles.

Principles		Description	Evidence
1	Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.	• There are no habitats of ecological importance on the site. • Habitat losses are fully compensated for on-site through habitat retention, enhancement and creation.
2	Avoid losing biodiversity that cannot be offset by gains elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.	• No irreplaceable habitats will be affected by the development.
3	Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.	• BNG is factored into the development design at an early stage through liaison with the client, master planner and landscape architect. • Future BNG monitoring and outcomes will be shared with all stakeholders.
4	Address risks	Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.	• The difficulty of creating new habitats and the time for habitats to reach target condition are accounted for in the Statutory Biodiversity Metric calculations and appropriate compensation provided.
5	Make a measurable Net Gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.	• The development will achieve a measurable overall BNG for habitats of 10.45% within the site. • The development will contribute towards the delivery of national and local BNG policies.
6	Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when: • Delivering compensation that is ecologically equivalent in type,	• This BNG report has been prepared using the most recent relevant planning policies, legislation and guidance. • The BNG assessment is based on the most recent survey data and local knowledge.

Principles		Description	Evidence
		amount and condition, and that accounts for the location and timing of biodiversity losses; • Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation; • Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels; and, • Enhancing existing or creating new habitat. • Enhancing ecological connectivity by creating more bigger, better and joined areas for biodiversity.	• Habitat creation and enhancement measures are designed to complement existing habitats and reinforce the Green Infrastructure of the wider area.
7	Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).	• The development has sought to exceed the minimum 10% BNG required by the Environment Act 2021 and the Local Planning Authority. These gains would not likely have occurred in the absence of this BNG policy or for the purpose of fulfilling habitat and species-specific mitigation.
8	Create a Net Gain legacy	Ensure Net Gain generates long-term benefits by: • Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity; • Planning for adaptive management and securing dedicated funding for long-term management; • Designing Net Gain for biodiversity to be resilient to external factors, especially climate change; • Mitigating risks from other land uses; • Avoiding displacing harmful activities from one location to another; and • Supporting local-level management of Net Gain activities.	• Stakeholders were engaged at an early stage in the development design to agree how BNG would be delivered by the project. • The landscaping scheme has been designed to reflect the local environment and incorporates native and wildlife friendly planting to provide long-term ecological benefits. • A Habitat Management and Monitoring Plan will be made a planning condition to ensure habitat target conditions are met and the predicted BNG is realised as outlined below. The Plan will detail how management will be implemented over a 30 year period and adapted to be resilient to external factors.
9	Optimise sustainability	Prioritise BNG and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	• Habitat compensation is designed according to the 'like for like or better' approach. • Habitat creation and enhancement measures are designed to complement the natural surroundings of this site and reinforce the Green Infrastructure of the wider area.

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Principles		Description	Evidence
10	Be transparent	Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	• This BNG Design Stage Report and supporting Statutory Biodiversity Metric will be shared with relevant stakeholders. • A Habitat Management and Monitoring Plan will evidence BNG delivery and this will be communicated to the local planning authority.

8.0 Compliance with National and Local Policy

National and local policies relating to BNG are described in Appendix 1. Table 5 demonstrates how the proposed development scheme at Carn Thomas has been designed to maximise BNG and comply with these policies.

Table 5: BNG Policy Compliance.

Policy	Compliance
National Planning Policy Framework	(187d): The mitigation hierarchy has been applied to minimise impacts of the development on biodiversity and to provide a net gain for biodiversity.
	(188): The development is located on land of low environmental value.
	192(b): The development will achieve *a* net gain for biodiversity through onsite habitat creation and enhancement measures.
25 Year Environment Plan	25 Year Plan Target for Thriving Plants and Wildlife. The development provides a biodiversity net gain and contributes towards the target '*creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network'*.
Isles of Scilly Local Plan 2015-2030	Policy OE1: The development has sought to retain and improve mixed scrub within the site to enhance the island's landscape.
	Policy OE2 (1): The development will achieve a measurable overall BNG for habitats of 10.45% within the site using the Statutory Biodiversity Metric calculator.
	Policy OE2 (2): The mitigation hierarchy has been applied to avoid or minimise impacts of the development on biodiversity. No unavoidable residual impacts which will remain after avoidance and mitigation measures are implemented have been identified.
	Policy OE2 (3): The scheme will secure compensation and provide net increases in biodiversity.
	Policy OE2 (5): The mitigation hierarchy has been applied to avoid or minimise impacts of the development on biodiversity. Impacts have been adequately and proportionately mitigated.
Cornwall and the Isles of Scilly Environmental Growth Strategy 2015-2065	The development will provide a BNG through on-site mitigation and compensation measures which will contribute to achieving the following: '*At least 30% of our land and seas will be positively managed for nature by 2030, and by 2050 we are*

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Policy	Compliance
	growing nature on twice as much land and four times as much of our inshore waters as in 2020'
	A Habitat Management and Monitoring Plan will be implemented to ensure that the development meets its % biodiversity targets and contributes to the Growth Strategy.

9.0 Statutory Biodiversity Metric - Results

The Statutory Biodiversity Metric was used to calculate the pre- and post-development biodiversity value of the site in biodiversity units for habitats; there are no existing hedgerows or watercourses on the site. The detailed calculations are provided in the Biodiversity Metric Excel spreadsheet that accompanies this BNG assessment and the results are summarised below. **N.B.** The Biodiversity Metric Excel spreadsheet presents values in two decimal places, but the calculations behind the presented values have more than two decimal places, which can result in small deviations in reported values.

Baseline habitats

The current, pre-development biodiversity value of the site is **1.96 habitat units**.

- 0.04 ha of mixed shrub in poor condition – 0.18 habitat units.
- 0.19 ha of tall forbs in moderate condition – 0.87 habitat units
- 0.1 ha of vacant/derelict land in poor condition – 0.23 habitat units
- 0.29 ha of bare ground in poor condition – 0.67 habitat units
- 0.003 ha of standing water in poor condition – 0.01 habitat units
- 0.001 ha of developed land, sealed surface – 0 habitat units.

In the absence of mitigation, the proposed development will result in the loss of 0.04ha of vacant/derelict land in poor condition and the loss of **0.09 habitat units.**

Post-development habitats

Habitat enhancements will deliver **0.34 habitat units** as follows:

- 0.04 ha of mixed scrub in poor condition uplifted to moderate condition – 0.34 habitat units. Management to include eradication of invasive non-native species and reinforcement with native woody species.

Habitat creation will deliver **1.14 habitat units** as follows:

- 0.04 ha (area equivalent) of 10 small trees in moderate condition – 0.14 habitat units.

Results summary

The proposed development will deliver an uplift of 0.21 habitat units and a **10.45% net gain** for habitats. There are no hedgerows and watercourses on-site (Figure 4).

BNG is contingent on successful implementation and management of habitat features over a 30-year period. We recommend that management of the habitat features is undertaken in accordance with a Habitat Management and Monitoring Plan (HMMP).

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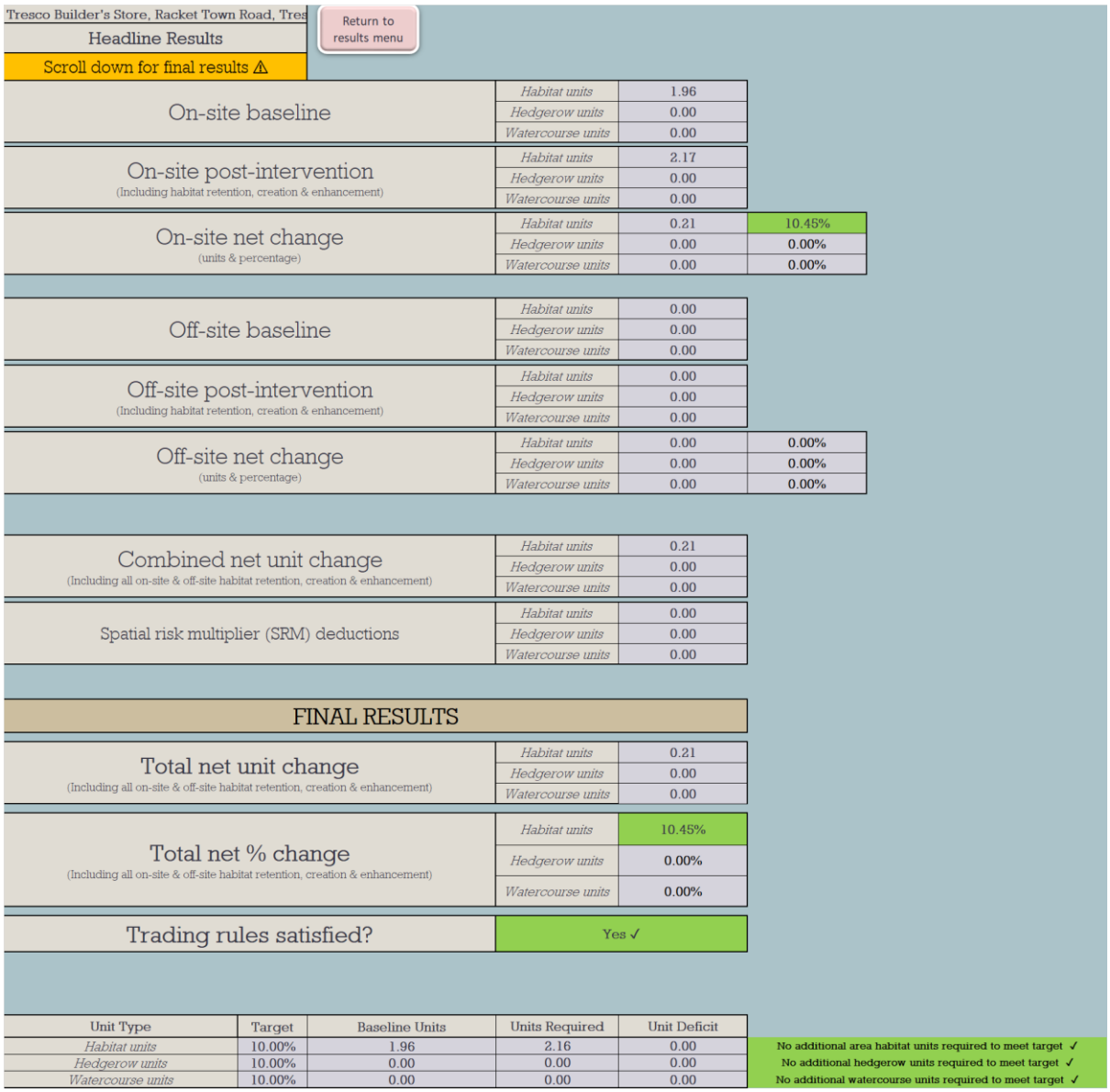
The Statutory Biodiversity Metric calculations are habitat-based and do not take into consideration all of the enhancement measures listed in Table 5 above, particularly relating to species. It is recommended that the biodiversity gains calculated by the Statutory Biodiversity Metric and the enhancements listed in Table 5 are both considered in the development, when determining the planning application.



Tresco Builder's Store, Racket Town Road, Tres

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Headline Results

Scroll down for final results ⚠

On-site baseline	Habitat units	1.96	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	2.17	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	Habitat units	0.21	10.45%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Off-site baseline	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.21	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	

FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.21
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	10.45%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Habitat units	10.00%	1.96	2.16	0.00	No additional area habitat units required to meet target ✓
Hedgerow units	10.00%	0.00	0.00	0.00	No additional hedgerow units required to meet target ✓
Watercourse units	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓

Figure 4: Tresco Builder's Yard - BNG Metric Summary Output.

10.0 Project Implementation

The project will be implemented through the following documents and plans:

- Detailed landscaping plan
- Planting schedule
- Construction Environmental Management Plan
- Habitat Management and Monitoring Plan.

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11.0 Habitat Management and Monitoring Plan

It is recommended that a Habitat Management and Monitoring Plan (HMMP) is prepared to ensure that the project meets the predicted BNG targets. This is likely to be made a planning condition. The Plan would include:

- Measurable objectives for BNG within all habitats and the management actions which will achieve these objectives.
- A work schedule for implementing management actions over a 30-year period, with milestones at years 2, 5, 10, 15, 20, 25 and 30 from commencement of development.
- A monitoring programme to measure key habitat indicators, assess habitat condition and evidence the successful delivery of BNG.
- A mechanism for reporting biodiversity outcomes and reviewing and adapting the work schedule as necessary.
- The responsibilities and the legal and financial arrangements for implementing the HMMP.

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13.0 Appendix 1: Legislation and Planning Policy

Protected Habitats, Species and Designated Sites

- **The Conservation of Habitats and Species Regulations (HM Government, 2017) (as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (HM Government, 2019))**, referred to here after as the '**Habitat Regulations**', encompasses Special Areas of Conservation (SACs) and provides additional protection for Special Protected Areas (SPA's), RAMSAR Sites and European Protected Species (EPS). Protection is afforded from direct and indirect impacts, particularly where mobile wildlife populations for which the SAC is designated may be significantly affected. A Habitats Regulations Assessment/Appropriate Assessment must be completed by the competent authority, based on sufficient information provided by the applicant, to meet Regulation 63 of the Habitats Regulations. The Waddenzee judgement ruled that a plan or project may be authorised only if a competent authority has made certain that the plan or project will not adversely affect the integrity of the site. A decision can only be reached "where no reasonable scientific doubt remains as to the absence of such effects". Competent authorities must be "convinced" that there will not be an adverse effect. Where doubt remains as to the absence of adverse effects, the plan or project must not be authorised, subject to the procedure outlined in the Habitats Regulations regarding imperative reasons of overriding public interest.
- **The Countryside and Rights of Way (CRoW) Act (HM Government, 2000, as amended)** The CROW Act places a statutory duty on Statutory Nature Conservation Organisations (SNCO) to have regard to biodiversity conservation and to promote conservation action by others. Section 74 of the Act requires the preparation and maintenance of lists of priority species and habitats. It also places a statutory duty on public bodies to conserve SSSIs and enhance their value, and provides SNCOs with the power to impose Management Schemes on owners of SSSIs. The CROW Act strengthens the legal protection for threatened species with regard to killing, injuring, disturbing or destroying places used for shelter and protection.
- **The Hedgerows Regulations (1997)** The Hedgerow Regulations 1997 were made under Section 97 of the Environment Act 1995 (HM Government, 1995) and took effect on 1 June 1997. They introduced arrangement for local planning authorities (LPAs) to protect important countryside hedgerows through a system of notification. Such hedgerows are frequently valuable because of their historical, ecological and landscape characteristics.

  Under the Hedgerow Regulations 1997, an offence occurs when:

  - A person intentionally or recklessly removes, or causes or permits another person to remove, a hedgerow in contravention of regulation 5(1) or (9); and when
  - A person contravenes or fails to comply with regulation 6(2).
  - A hedgerow is a boundary line of shrubs or trees and is 'important', and protected, under the Hedgerow Regulations 1997 if it meets a specific criterion. Cornish hedgerows do not necessarily meet the criteria of the Hedgerow Regulations 1997 but are typically of great historic, landscape and biodiversity value. The Hedge (and wall) Importance Test (HIT), developed by the Guild of Cornish Hedgers, is an alternative measure of value and is required to inform planning decisions impacting hedgerows in Cornwall (Cornwall Council, 2018).

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- **The Natural Environment and Rural Communities (NERC) Act (HM Government, 2006)** bestows a legal duty on public authorities to conserve biodiversity. The Section 40 duty requires Local Authorities to have regard to the purpose of conserving biodiversity. This particularly relates to Section 41 Habitats and Species of Principal Importance (sometimes called 'priority habitats' or 'priority species'.
- **The Protection of Badgers Act (1992)** protects badgers as specified below.
- **The Wildlife and Countryside Act (HM Government 1981, as amended)** encompasses the protection of wildlife (fauna and flora), SSSIs, SPAs, National Nature Reserves (NNRs) and RAMSAR Sites.

Badgers: Badgers are legally protected under the Protection of Badgers Act 1992. As a result of this statutory legislation it is an offence to:

- Purposely kill, injure or take a badger;
- Intentionally or recklessly damage, destroy or obstruct access to a badger sett;
- Disturb a badger when occupying a sett.

Birds: In Britain the nests (whilst in use or being built) and eggs of wild birds are protected against taking, damage and destruction under the Wildlife and Countryside Act 1981 (as amended) (HM Government, 1981).

Some species (i.e. barn owl) are also listed on Schedule 1 of the Wildlife and Countryside Act (HM Government, 1981 as amended); it is an offence to:

- Intentionally capture, injure or kill a Schedule 1 listed species;
- Intentionally or recklessly disturb a Schedule 1 listed species whilst nesting;
- Intentionally or recklessly disturb a dependent young Schedule 1 listed species.

European Protected Species (EPS) (Bat, dormouse, otter, water vole, sand lizard, smooth snake & great crested newt): EPS are listed on Annex IV(a) of the European Communities Habitats Directive.

In Britain protection of EPS is achieved through their inclusion on Schedule 2 of the Conservation and Habitats Regulations 2017 (as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (HM Government, 2019)), Schedule 5 of the Wildlife and Countryside Act 1981 (1981, as amended) and Schedule 12 of the Countryside and Rights of Way Act 2000 (HM Government, 1981, 2000 & 2017).

As a result of this statutory legislation, it is an offence to:

- Deliberately capture, injure or kill an EPS;
- Intentionally or recklessly disturb an EPS in its place of rest/ breeding Site;
- Intentionally or recklessly damage, destroy or obstruct access to a EPS place of rest/ breeding Site (even if the EPS is not occupying the resting / breeding place at the time);
- Possess or sell or exchange an EPS (dead or alive) or part of an EPS.

Reptiles (adder, common lizard, slow worm and grass snake): reptiles are protected under Schedule 5 (section 9(1) and 9(5)) of the Wildlife and Countryside Act 1981 (as amended). This legislation makes it an offence to kill and/ or injure reptiles, and sell or transport for the purpose of sale. Sand lizard and smooth snake are also EPS (see above legal protection of EPS).

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Invasive plants: The WCA 1981 states that if any person plants or otherwise causes to grow in the wild any plant which is included in Part II of Schedule 9, he shall be guilty of an offence. Anyone convicted of an offence under Section 14 of the WCA 1981 may face a fine of £5,000 and/or 6 months imprisonment, or 2 years and/or unlimited fine or indictment. The following legislation is relevant to invasive plants:

Control of Pesticides Regulations (CoPR) 1986: CoPR 1986 require any person who uses a pesticide to take all reasonable precautions to protect the health of human beings, creatures and plants, safeguard the environment and in particular avoid the pollution of water. For application of pesticides in or near water, approval from the Environment Agency should be sought before use.

Environmental Protection Act 1990 (EPA 1990): EPA 1990 contains a number of legal provisions concerning 'controlled waste', which is set out in Part II. Material containing the propagules of species listed on Schedule 9 is classified as controlled waste and must be safely disposed of at an appropriately licensed landfill site in accordance with the Environmental Protection Act 1990 (Duty of Care) Regulations 1991. Section 33 (1a) and (1b) create offences to do with the deposit, treating, keeping or disposing of controlled waste without a license. Exemptions from licensing are available in some circumstances, and are set out in Schedule 3 to the Waste Management Licensing Regulations 1994 as amended, which makes it an offence to keep, treat or dispose of controlled waste in a manner likely to cause pollution of the environment or harm to human health. Anyone convicted is subject to a maximum fine of £20,000 and/or 6 months imprisonment and if prosecuted under the Crown court, this escalates to an unlimited fine and/or a maximum of two years imprisonment. Section 34 places duties on any person who imports, produces, carries, keeps, treats or disposes of controlled waste. Waste must be handled responsibly and in accordance with the law at all stages between its production and final recovery or disposal. Waste must be transferred to an authorized person i.e. either a registered carrier or exempted from registration by the Controlled Waste (Registration of Carriers and Seizure of Vehicle Regulations 1991). A waste transfer note must be completed and signed giving a written description of the waste, which is sufficient to enable the receiver of the waste to handle it in accordance with his or her own duty of care. The provisions concerning waste transfer notes are set out in the Environmental Protection (Duty of Care) Regulations 1991(as amended). Failure to comply with these provisions is an offence, with a penalty of a fine not exceeding £5000 up to an unlimited fine in Crown court.

Hazardous Waste Regulations 2005 (HWR 2005): HWR 2005 contains provisions about the handling and movement of hazardous waste. Consignment notes must be completed when any hazardous waste is transferred, which include details about the hazardous properties and any special handling requirements. If a consignment note is completed, a waste transfer note is not necessary. Material containing knotweed that has been treated with herbicide may be classified as hazardous waste.

Waste Management Licensing Regulations (WMLR 1994): WMLR state that failure to use a licensed operative could leave you liable to prosecution. The 'waste relevant objectives' are described in paragraph 4 of Schedule 4. These objectives require that waste is recovered or disposed of "without endangering human health and without using processes or methods which could harm the environment and in particular without risk to water, air, soil, plants or animals; or causing nuisance through noise or odours; or diversely affecting the countryside or places of special interest".

Statutory Designated Sites

Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are of International nature conservation importance.

Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) are of National importance. Development proposals with potential to affect a SAC, SSSI or NNR require permission from Natural England.

Local Nature Reserves (LNRs) are protected from development; the Local authority is responsible for LNRs.

Non-Statutory Designations

Non-statutory Sites include **County Wildlife Sites (CWS)**, **Site of Nature Conservation Interest (SNCI), Site of Importance for Nature Conservation (SINC), County Geology Sites (CGS)**, **Roadside Verge Audit Biological Sites** and **Ancient Woodlands**. CWSs, SNCI, SINC and CGSs are of at least county importance for wildlife/geology; all are given increased protection through the planning process.

Biodiversity Action Plans (BAPs): BAPs distinguish National and County level priority habitats and species for conservation. The list of habitats and species of principal importance under Section 41 NERC Act (2006) in England includes 56 habitats and 943 species first identified as priority habitats and species. The Local Authority has a duty to conserve habitats and species of principal importance; these habitats and species were previously identified as UK BAP priority habitats and species under Section 74 of the CRoW Act (2000).

Red Data Books & Lists: detail the status of species in relation to threat.

Planning Context

The local planning authority has a statutory obligation to consider impacts upon protected species resulting from development. Paragraph 99 ODPM Circular 06/2005 states: '*It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted*'.

National Policy: The National Planning Policy Framework (NPPF) was revised in February 2025 and sets out the government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018, 2019, September 2023 and December 2023, and December 2024.

Chapter 15 of the NPPF (2025) 'conserving and enhancing the natural environment' sets out how the planning system should contribute to and enhance the natural and local environment by:

187. 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);

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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.

188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks, and the Broad. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

191. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

192. To protect and enhance biodiversity and geodiversity, plans should:

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a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

193. 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.

194. The following should be given the same protection as habitats sites:

a) potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites71; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

195. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Local Policy – Isles of Scilly

Council of The Isles of Scilly(2021) The Isles of Scilly Local Plan Isles of Scilly Local Plan Including Minerals and Waste 2015 to 2030

The latest Local Plan was adopted in March 2021. The key relevant policies from the Local Plan relating to ecology and nature conservation (OE1 and OE2) are described below:

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Policy OE1 Protecting and enhancing the landscape and seascape

Development will only be permitted where it aligns with the statutory purpose of Areas of Outstanding Natural Beauty (AONB), and therefore conserves and enhances the islands' landscape, seascape and scenic beauty. Development must take into account and respect: a) the distinctive character, quality, scenic beauty and sensitivity of the landscape and seascape; b) the undeveloped and special character of the Heritage Coast; c) other qualities, such as important features and views, dark skies and tranquillity, and having regard to the AONB Management Plan; and d) the Isles of Scilly Landscape Character Study and any successor or associated documents. 2) Development will not be supported on the uninhabited islands.

Policy OE2 Biodiversity and Geodiversity

1) Development proposals will be permitted where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation, and should:

a) Protect the hierarchy of international, national and local designated sites in accordance with their status;

b) Retain, protect and enhance features of biodiversity and geological interest (including supporting habitat and commuting routes through the site and taking due account of any use by migratory species) and ensure appropriate and long-term management of those features;

c) Contribute to the restoration and enhancement of existing habitats and the creation of wildlife habitats and linkages between sites to create and enhance local ecological networks;

d) Seek to eradicate or control any invasive non-native species present on site; and

e) Be required to contribute to the protection, management and enhancement of biodiversity and geodiversity.

2) Development proposals must:

a) apply the mitigation hierarchy to all proposals;

b) demonstrate how they conserve or enhance biodiversity and ecosystem processes;

c) follow local guidance on biosecurity to control the spread of invasive non-native species; and

d) ensure proportionate and appropriate biodiversity net-gain is secured.

3) Development proposals will not be supported where significant and harmful direct or indirect effects on biodiversity and ecosystem processes are identified, unless:

a) the need for the development clearly outweighs the harm caused; and

b) an appropriate scheme is proposed that will secure compensation and net-increases in biodiversity.

4) Development proposals will not be permitted where a detrimental impact is identified to geodiversity sites unless the need for development outweighs the harm caused.

Avoidance, Mitigation and Compensation for Biodiversity and Geodiversity Impacts.

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5) Development should avoid adverse impacts on existing biodiversity and geodiversity interests as a first principle, and enable measurable net gains by designing-in biodiversity features and enhancements and opportunities for geological conservation alongside new development, in accordance with Policies SS1 and SS2. Where adverse impacts are unavoidable, it must be demonstrated that the development cannot be reasonably located on an alternative site that would result in less or no harm to biodiversity or geodiversity interests; and impacts must be adequately and proportionately mitigated. If full mitigation cannot be provided, compensation will be required as a last resort. Clear arrangements for the long-term maintenance or management of the mitigation and compensation need to be provided.

Council of The Isles of Scilly(2008) The Isles of Scilly Supplementary Planning Document. Biodiversity and Geological Conservation. December 2008. Isles of Scilly Biodiversity & Geodiversity SPD.pdf.

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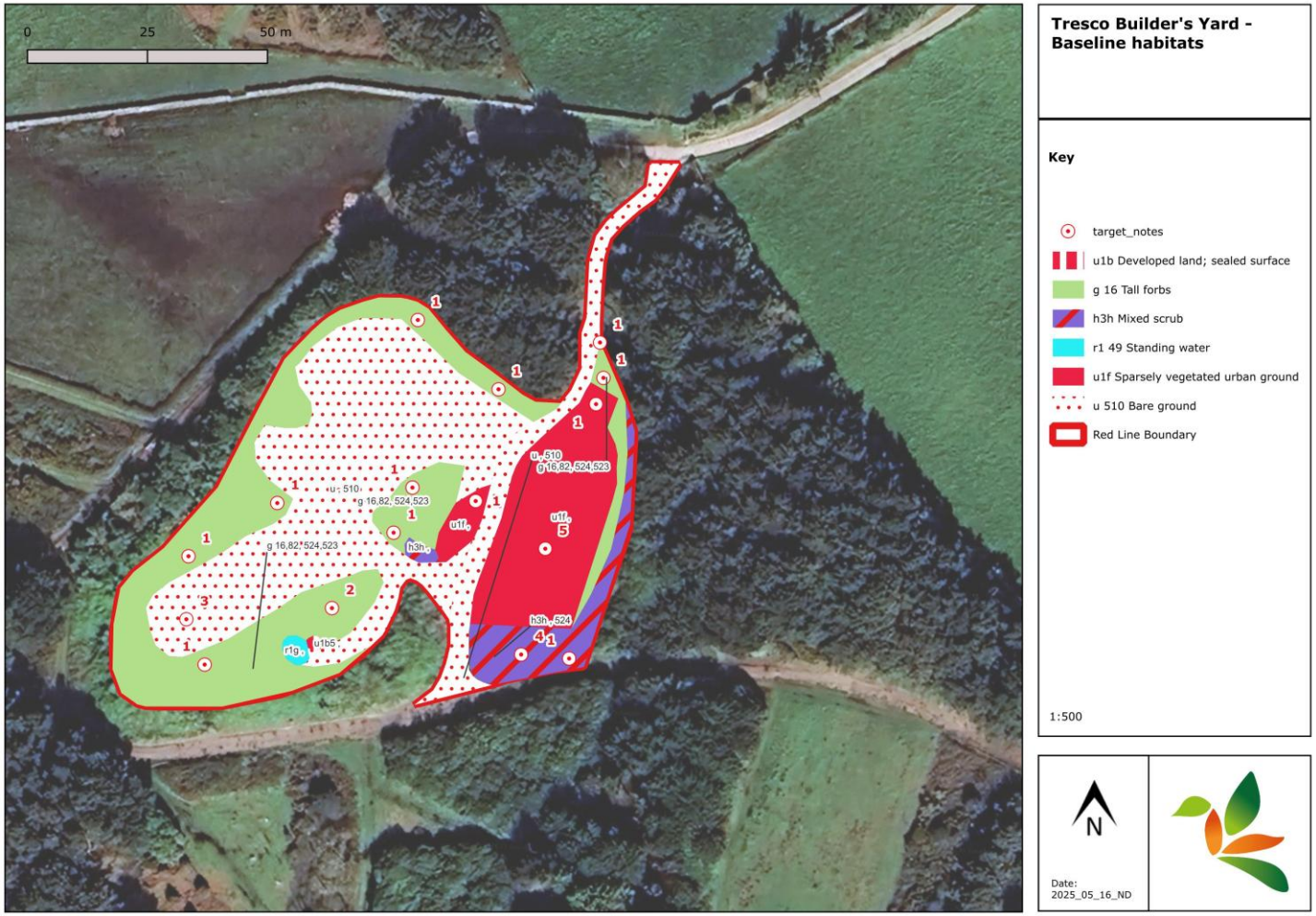
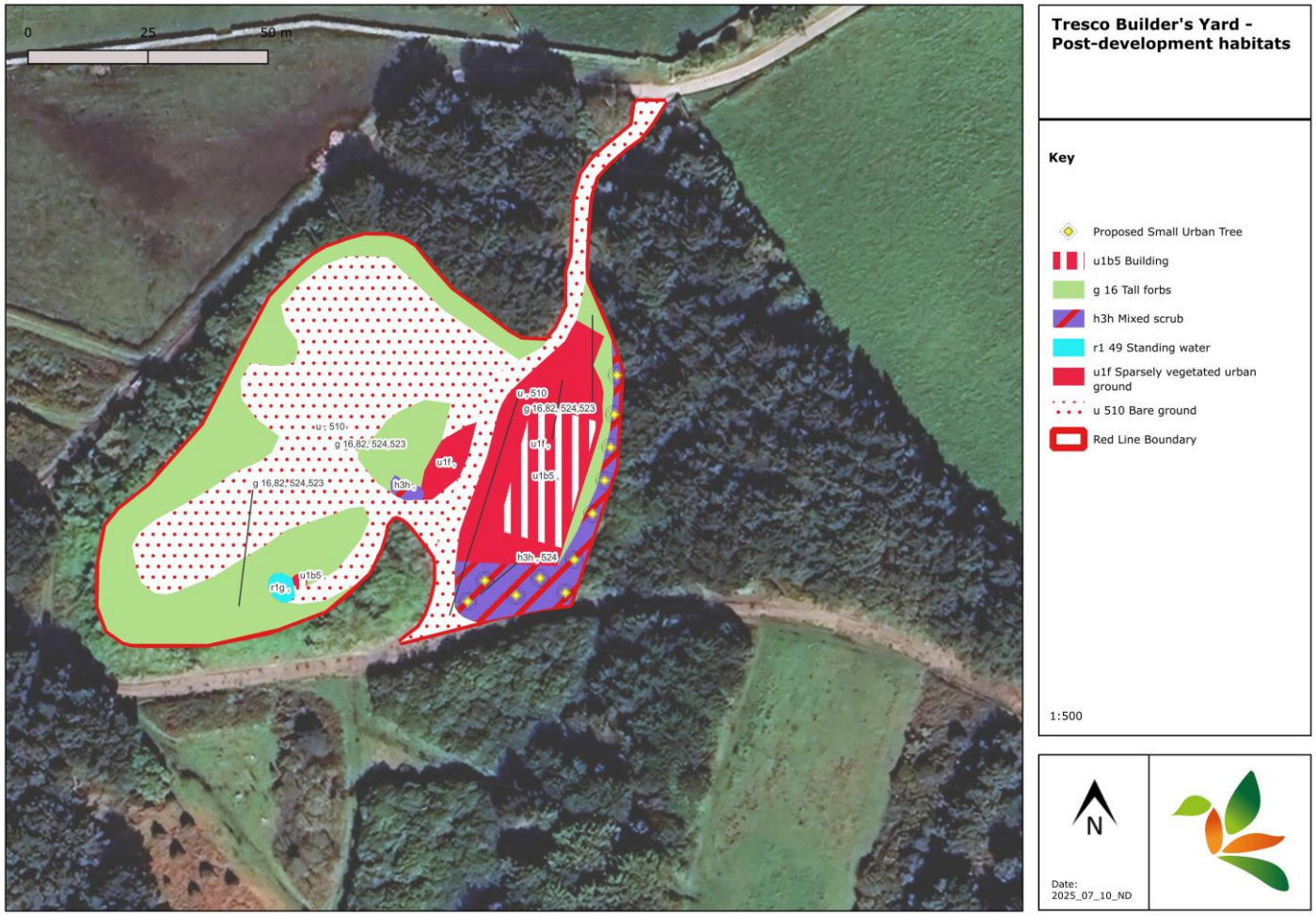
14.0 Appendix 2: Pre-development baseline habitats



15.0 Appendix 3: Post-development habitats



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