

WESTON HOMES



**ECOLOGY**SOLUTIONS

Part of the ES Group

ANGLIA SQUARE,  
NORWICH

**Biodiversity Net Gain  
Assessment**

April 2022  
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## **PLANS**

PLAN ECO1	Site Location and Ecological Designations
PLAN ECO2	Ecological Features

## 1. INTRODUCTION

- 1.1. This Biodiversity Net Gain Assessment has been prepared by Ecology Solutions on behalf of Weston Homes Plc (the Applicant) in support of a hybrid (part full / part outline) planning application (the Application), submitted to Norwich City Council (NCC) for the comprehensive redevelopment of Anglia Square and various parcels of mostly open surrounding land (the Site), as shown within a red line on drawing 'ZZ-00-DR-A-01-0200'.
- 1.2. The Site is located in a highly accessible position within the northern part of Norwich City Centre and comprises a significant element of the Anglia Square / Magdalen Street / St Augustines Large District Centre, (the LDC). It is thus of strategic importance to the City and, accordingly, has been identified for redevelopment for many years within various local planning policy documents, including the Northern City Centre Area Action Plan 2010 (NCCAAP) (now expired), the Joint Core Strategy for Broadland, Norwich and South Norfolk 2014 (JCS), and NCC's Anglia Square and Surrounding Area Policy Guidance Note 2017 (PGN). The Site forms the principal part of an allocation (GNLP 0506) in the emerging Greater Norwich Local Plan (GNLP).
- 1.3. This application follows a previous application on a somewhat smaller development parcel (NCC Ref. 18/00330/F), made jointly by Weston Homes Plc as development partner and Columbia Threadneedle Investments (CTI), the Site's owner, for a residential-led mixed use scheme consisting of up to 1,250 dwellings with decked parking and 11,000 sqm GEA flexible ground floor retail/commercial/non-residential institution floorspace, hotel, cinema, multi-storey public car park, place of worship, and associated public realm and highway works. This was subject to a Call-in by the Secretary of State (PINS Ref. APP/G2625/V/19/3225505) who refused planning permission on 12th November 2020 (the 'Call in Scheme').
- 1.4. In April 2021, following new negotiations with Site owner CTI, Weston Homes decided to explore the potential for securing planning permission for an alternative scheme via an extensive programme of public and stakeholder engagement, from the earliest concepts to a fully worked up application. The negotiations with CTI have secured a "Subject to Planning" contract to purchase the Site (enlarged to include the southeastern part of Anglia Square fronting Magdalen Street and St Crispins Road), which has enabled a completely fresh approach to establishing a redevelopment scheme for Anglia Square. This has resulted in a different development brief for the scheme, being to create a replacement part of the larger LDC suited to the flexible needs of a wide range of retail, service, business and community uses, reflective of trends in town centre character, integrated with the introduction of homes across the Site, within a highly permeable layout, well connected to its surroundings.
- 1.5. The new development proposal seeks to comprehensively redevelop the Site to provide up to 1,100 dwellings and up to 8,000sqm (NIA) flexible retail, commercial and other non-residential floorspace including Community Hub, up to 450 car parking spaces (at least 95% of spaces for class C3 use, and up to 5% for class E/F1/F2/Sui Generis uses), car club spaces and associated works to the highway and public realm areas (the Proposed Development). These figures are maxima in view of the hybrid nature of the application. This proposes part of the scheme designed in full, to accommodate 367 dwellings, 5,808 sqm non-residential floorspace, and 146 car parking spaces (at least 95% spaces for residential use and up to 5% for non-residential use), with the remaining large

part of the Site for later detailed design as a Reserved Matters application, up to those maxima figures.

- 1.6. This Biodiversity Net Gain Assessment provides Norwich City Council with information regarding the level of Biodiversity Net Gain (BNG) of the proposed development. It has been prepared with due consideration to the guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM)<sup>12</sup> in relation to Biodiversity Net Gain and is based on the results of the habitat surveys completed, as set out in the Ecological Assessment.

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<sup>1</sup> CIEEM (2019). *Biodiversity Net Gain. Good Practice Principles for Development, A Practical Guide.*

<sup>2</sup> CIEEM, CIRIA, IEMA (2016). *Biodiversity Net Gain: Good Practice Principles for Development.*

## 2. BIODIVERSITY METRIC 3.0

- 2.1. The Biodiversity Metric 3.0 was released on 7 July 2021 and uses habitat features as a proxy measure for capturing the value and importance of nature. It uses calculations to assess the importance of each habitat based on its size, ecological condition and location.
- 2.2. Measurements for habitats pre-development were calculated using QGIS. Assessments regarding the habitats present, as well as their condition, were based on information gathered during survey work. The Biodiversity Technical Supplement<sup>3</sup> and professional judgment were used to inform the habitats' condition criteria.
- 2.3. Measurements for the post-development situation were calculated using the Hardworks Site Plan (ANG-PLA-XX-XX-DR-L-1000), Softworks Site Plan (ANG-PLA-XX-XX-DR-L-2000), and Softworks Plan Roof Level (ANG-PLA-XX-XX-DR-L-2001), prepared by Planit-IE, the project landscape architects. Clarification on the nature of the landscape proposals was provided by Planit-IE where necessary.
- 2.4. Given the hybrid nature of the application, with some information provided in outline only, this assessment has used reasonable assumptions as to the relative proportions of new habitats to be established in particular areas within the outline application site. These assumptions have been discussed and agreed with Planit-IE.

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<sup>3</sup> Natural England (2021). *The Biodiversity Metric 3.0, Auditing and Accounting for Biodiversity, Technical Supplement*, Natural England Joint Publication JP039.

### 3. METHOD FOR CALCULATING POST-DEVELOPMENT STATUS

#### *BNG Metric*

- 3.1. The metric runs calculations based on all areas within the detailed and outline application boundaries. The metric is designed to provide habitats which are accurately reflective of those proposed in the Hardworks and Softworks Site Plans but incorporates a more conservative approach to the condition scoring of proposed habitats. Proposed habitats have thus been classified as 'Poor' condition to illustrate the minimal biodiversity impact that they will have within the Site.

#### *Green Roof*

- 3.2. The 'Softworks Plan Roof Level' was used to inform the classification of proposed roof habitats. The extensive green roof within the detailed application area will comprise a sedum green roof system and has been classified as 'Extensive Green Roof' within the metric. The proposed intensive roof space (hereafter referred to as non-extensive roof space) within the detailed application area will comprise a mix of 'Residential Yard', 'Lawn Area', and hardstanding. These habitats have been classified based on their expected future use (see Table 3.1).
- 3.3. Owing to the outline nature of the proposed green roof areas beyond the detailed application boundary, assumptions were made regarding the composition of non-extensive green roof areas. These assumptions were agreed with Planit-IE.
- 3.4. For the purpose of the metric, non-extensive green roof areas within the outline application site were divided into several habitat types based on detailed habitat information contained within the Softworks Plan Roof Level. This plan was used as a guide to determine the potential habitats comprising the outline roof areas. Thus, the outline non-extensive green roof area was divided into 'Residential Yard' (40%), 'Lawn Area' (10%), and hardstanding (50%). This was considered an accurate reflection of the non-extensive roof areas within the detailed application site.
- 3.5. The assumed area of extensive green roof within the outline application site is deemed to comprise the same pre-grown sedum green roof system as the detailed application roof areas.

#### *Remaining Areas*

- 3.6. The remaining areas of hard and softworks were assigned appropriate habitats and condition scores based on their expected future use. The proposed habitats and their metric counterparts are illustrated in Table 3.1.

<b>Proposed Habitat</b>	<b>BNG Metric Classification</b>
Wildflower	Other Neutral Grassland
Swale Planting	Bioswale
St George's St Mix	Ground Level Planters
Botolph St Mix	Ground Level Planters
Residential Yard Mix	Ground Level Planters
Lawn Area	Modified Grassland
Green Roof	Extensive Green Roof
Tree Planting	Urban Tree

<b>Proposed Habitat</b>	<b>BNG Metric Classification</b>
Mixed Native Hedging	Hedge Ornamental Non-Native
Buildings / Hardstanding	Developed Land; Sealed Surface
Self-binding Gravel	Artificial Unvegetated, Unsealed Surface

**Table 3.1.** Reconciliation of landscape strategy and metric habitat types.



#### 4. RESULTS AND DISCUSSION OF METRIC

4.1. This section should be read in conjunction with the Biodiversity Metric calculation tool which has been provided separately.

##### 4.2. Baseline Habitat (Pre-Development)

4.2.1. Table 4.1 below summarises the habitats present on site pre-development.

4.2.2. A baseline total of 1.03 habitats units and 0 hedgerow units are present within the Site pre-development.

Habitat Units					
Baseline habitat	Baseline Biodiversity Units	Condition	Ecological Features	Impact	After Works
Developed Land; Sealed Surface	0	N/A	The majority of the Site comprises buildings with associated hardstanding including car parking and roads. Anglia Square, a concrete plaza, is situated towards the centre of the Site.	The majority of these areas are to be lost, with new buildings and associated infrastructure created in their place.  A small portion of Magdalen Street, to the southeast of the Site, will be retained, as will a small shed-like structure in the northwestern site parcel (Block B).	0 units lost
Modified Grassland	0.53	Poor	Several areas of modified grassland are present across the Site, with the majority of these areas being situated within the largest southern site parcel. A small area of grassland is present within Block B. The northeastern site parcel (Block C) is devoid of this habitat.	All areas are to be lost.	0.53 units lost
Urban Tree	0.50	Poor	Twenty-eight trees are present across the Site and comprise Silver Maple <i>Acer saccharinum</i> , Common Lime <i>Tilia x europaea</i> , Large-leaved Lime <i>Tilia platyphyllos</i> , Sycamore <i>Acer pseudoplatanus</i> , Oak <i>Quercus</i> sp., Red Oak <i>Quercus rubra</i> , Silver Birch <i>Betula pendula</i> , Whitebeam <i>Sorbus aria</i> , and London Plane <i>Platanus x hispanica</i> . These trees constitute	Twelve trees will be lost as part of the development (T2, T3, T6, T14, T15 and G1).	0.14 units lost  0.36 units retained

			<p>Trees T1-T4, T6-T22, and a group of seven trees (G1) comprising Sycamore, Laburnum <i>Laburnum anagyroides</i>, and Elder <i>Sambucus nigra</i>.</p> <p>A single Rowan <i>Sorbus</i> sp. (T23) is present off-site to the southeast along Magdalen Street and a single Sycamore (T5) is present immediately off-site to the northwest of Block C.</p>	
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**Table 4.1** Summary of Baseline Habitats.

### 4.3. Post-Development

4.3.1. Table 4.2 below summarises the habitats that are proposed on-site, post-development.

4.3.2. The proposals will comprise a variety of habitats including Other Neutral Grassland, Modified Grassland, Ground Level Planters, Bioswale, Extensive Green Roof, Hedgerow, and Urban Trees. In addition, Buildings with associated hardstanding will be created across the Site.

Created Habitats				
Metric Habitat	Landscape Plan Habitat	Condition	Biodiversity Units	Comments
Other Neutral Grassland	Wildflower Seed Mix	Poor	0.34	An area of Wildflower Grassland will be created within the south of the southern site parcel adjacent to St Crispins Road, in addition to within the south of Block B. These areas will be sown with 'Emorsgate EM4 Meadow Mixture for Clay Soils'. This mix comprises a diverse assemblage of grass and floral species and it is considered that these areas will be left largely unmanaged to allow for areas of tall or tussocky sward. Thus, Other Neutral Grassland is considered an appropriate classification for this habitat.
Modified Grassland	Lawn Area	Poor	0.13	Amenity lawn is proposed in Blocks B and C, in addition to roof areas within the detailed application area. These areas will be managed to retain their aesthetic value and constitute a short species sward. Modified Grassland has therefore been used to classify this habitat.
Ground Level Planters	St George's St Mix / Botolph St Mix / Residential Yard Mix	Poor	0.58	Shrub and groundcover planting is proposed across the Site at ground level and on roof areas within the detailed application boundary. These areas will comprise an almost entirely non-native mix of ornamental plants. The proposed planting constitutes the 'St George's St Mix', the 'Botolph St Mix', and the 'Residential Yard Mix'. This vegetation will be situated in planting beds throughout the Site and as such, these areas have been treated as 'Ground Level Planters', fixed at poor condition.

Bioswale	Swale Planting	Poor	0.07	Areas of swale are proposed within the southern site parcel, along the western and southwestern site boundary. These areas will be sown with 'Emorsgate EP1 Pond Edge Mixture' and 'Emorsgate EM4 Meadow Mixture for Clay Soils'. In addition, a selection of native and non-native species will be planted here including Yellow Iris <i>Iris pseudacorus</i> and Pendulous Sedge <i>Carex pendula</i> . The area is to be designed to provide benefits for biodiversity in addition to offering functional drainage.
Extensive Green Roof	Extensive Green Roof	Poor	0.20	Extensive green roofs within the detailed application area will comprise a pre-grown sedum green roof system. It is considered that the sedum roof system will not comprise an overly diverse assemblage of plant species and as such the low distinctiveness 'Extensive Green Roof' classification has been assigned to this habitat.
Developed Land; Sealed Surface	New buildings and associated hardstanding	N/A	0	The development proposal is to redevelop the Site to provide up to 1,100 dwellings and up to 8,000sqm (NIA) flexible retail, commercial and other non-residential floorspace.
Artificial Unvegetated, Unsealed Surface	Self-binding gravel	N/A	0	To the west of Block K/L, a self-binding gravel will complement an area of hardstanding, where the redeveloped Anglia Square will be situated. This area has been classified separately from areas of paving given its permeable nature and as such, is classified as Artificial Unvegetated, Unsealed Surface.
Ground Level Planters	Residential Yard Mix (outline non-extensive roof)	Poor	0.50	The area of non-extensive green roof within the outline application area has been separated into several habitat types. Ground Level Planters have been assigned to 40% of this area.
Modified Grassland	Lawn Area (outline non-extensive roof)	Poor	0.13	Modified Grassland comprises 10% of the non-extensive green roof area within the outline application.
Developed Land; Sealed Surface	Hardstanding (outline non-extensive roof)	N/A	0	Developed Land comprises the remaining 50% of the non-extensive green roof area within the outline application.
Extensive Green Roof	Extensive Green Roof (outline extensive roof)	Poor	0.23	The estimated area of extensive green roof within the outline application area is considered to comprise the same pre-grown sedum green roof system as the detailed application roof areas.
Urban Tree	Tree Planting	Poor	0.27	A total of 211 small trees will be planted across the Site (156 trees at ground level and 55 at podium/roof level).
<b>Created Hedgerows</b>				
Hedge Ornamental Non-Native	Mixed Native Hedging	Poor	0.86	New ornamental hedgerows will be planted throughout the Site in all three site parcels. Hedgerows will comprise native Box <i>Buxus sempervirens</i> and Beech <i>Fagus sylvatica</i> . Proposed hedgerows are to be maintained at

				1.2m in height and will provide an amenity aesthetic in addition to offering habitat for local wildlife.
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**Table 4.2.** Summary of post-development habitats and hedgerows.

4.3.3. Table 4.3 summarises the BNG results for the Site.

Baseline	Habitat Units	1.03
	Hedgerow Units	0
	River Units	0
Post-intervention	Habitat units	2.80
	Hedgerow Units	0.86
	River Units	0
Total Net Unit Change	Habitat units	<b>1.77</b>
	Hedgerow Units	<b>0.86</b>
	River Units	0
Total net Percentage Gain	<b>Habitat Units</b>	<b>172.33%</b>
	<b>Hedgerow units</b>	<b>100%</b>
	River Units	N/A

**Table 4.3.** Summary of Biodiversity Net Gain results.

- 4.3.4. The proposed development would result in a gain of 1.77 habitats units. This results in an increase of 172.33% from pre- to post-development.
- 4.3.5. There is also a gain in linear features (i.e. hedgerows) of 0.86 hedgerow units, which is a percentage change of 100%.
- 4.3.6. The targeted conditions for proposed habitats will be achieved through appropriate management undertaken during the operational phase of the proposals. This will ensure that the proposed habitats continue to offer biodiversity benefit in the future.

## 5. EVALUATION

### 5.1. The Principles of Evaluation

#### *Biodiversity Net Gain – Good Practice Principle for Development*

- 5.1.1. CIRIA, CIEEM and IEMA have developed principles of good practice to achieve Biodiversity Net Gain. These principles provide a framework that helps improve the UK's biodiversity by contributing towards strategic priorities to conserve and enhance nature through sustainable development. There are ten principles in total, and all principles must be applied together as one approach. The ten principles are set out below.
- 5.1.2. **Principle 1. Apply 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 compensation 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.
- 5.1.3. **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.
- 5.1.4. **Principle 3. Be inclusive and equitable.** Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluation the approach to net gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.
- 5.1.5. **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.
- 5.1.6. **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.
- 5.1.7. **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:
- Delivering compensation that is ecologically equivalent in type, 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.
  - Enhancing existing or creating new habitat.

- Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity.

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

5.1.9. **Principle 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.
- Supporting local-level management of net gain activities.

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

5.1.11. **Principle 10. Be transparent.** Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

#### *Lawton's Principle*

5.1.12. Principles for enhancing England's wildlife sites were developed as part of the Lawton Review<sup>4</sup>. Across the UK, these principles can be used to design Biodiversity Net Gain activities to boost wildlife sites. They are:

- Improving the quality of wildlife sites;
- Increasing the size of the wildlife sites;
- Enhancing connections between, or joining up wildlife sites;
- Creating new wildlife sites; and
- Reducing pressure on wildlife sites.

## 5.2. Post-Development Evaluation

5.2.1. The contribution of the Site to Biodiversity Net Gain has been assessed with due regard to the principles outlined and discussed above.

5.2.2. The landscape strategy includes a variety of habitats including Other Neutral Grassland, Modified Grassland, Ground Level Planters, Bioswale, Extensive Green Roof, Hedgerow, and Urban Trees. In addition, Buildings with associated hardstanding will be created across the Site. Provision of these new habitats will not only mitigate for the losses of on-site habitat but provide significant net benefit and new opportunities for wildlife.

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<sup>4</sup> Department for Environment, Food and Rural Affairs (2010). *Making Space for Nature: A Review of England's Wildlife Sites*, DEFRA.

Baseline	Habitat Units	1.03
	Hedgerow Units	0
	River Units	0
Post-intervention	Habitat units	2.80
	Hedgerow Units	0.86
	River Units	0
Total Net Unit Change	Habitat units	1.77
	Hedgerow Units	0.86
	River Units	0
Total net Percentage Gain	<b>Habitat Units</b>	<b>172.33%</b>
	<b>Hedgerow units</b>	<b>100%</b>
	River Units	N/A

**Table 5.1.** Summary of Biodiversity Net Gain results.

### 5.3. Substantial Weight

- 5.3.1. In the decision in Rainham, Kent (MC/19/1566; 3 November 2021), the Inspector concluded a 20% gain should be given substantial weight (paragraph 12.204):

**Indeed, one of the suggested conditions secures at least 20% biodiversity net gain. I consider that the benefits secured in this regard attract substantial weight.**

- 5.3.2. The Secretary of State agreed with the Inspector's decision (paragraph 35 of the Secretary of State's letter):

**For the reasons given at IR12.204, the Secretary of State agrees that the development would result in significant improvements in terms of ecology and biodiversity. Like the Inspector, he considers that the benefits secured in this regard attract substantial weight.**

- 5.3.3. Consistent with these positions, it can be stated that the BNG benefits that would accrue from the proposed development should attract substantial weight.

## **6. SUMMARY AND CONCLUSIONS**

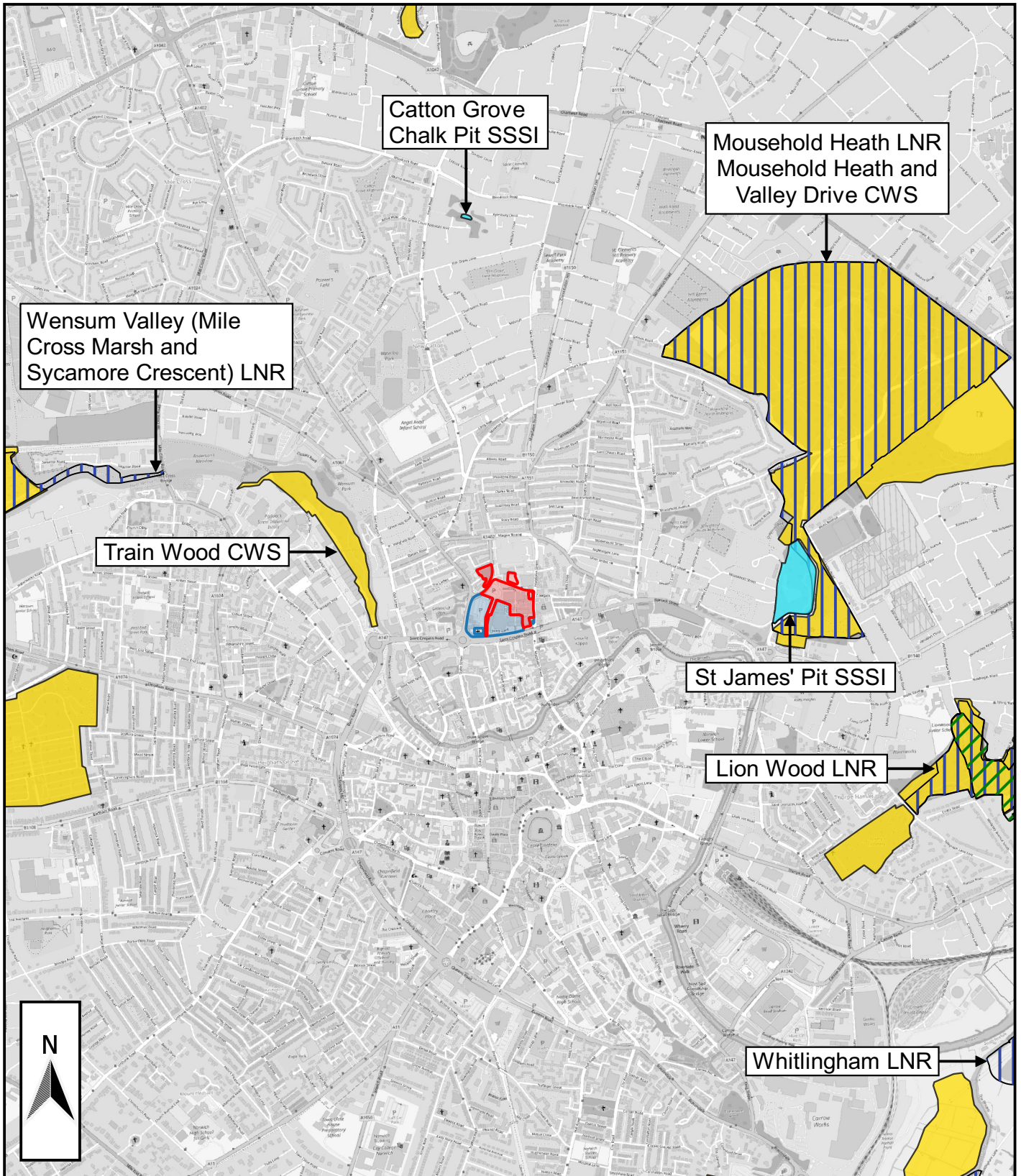
- 6.1. The Biodiversity Metric 3.0 was used to calculate the pre-development baseline units. A total of 1.03 baseline habitat units and 0 hedgerow units are present pre-development.
- 6.2. The proposed development will achieve an increase of 172.33% in habitat units and 100% in hedgerow units.
- 6.3. The landscape scheme has been designed to ensure that gains for biodiversity are achieved. Proposals will increase the floristic diversity across the Site, which in turn will attract a greater diversity of invertebrates and increase opportunities for foraging and dispersal for birds.
- 6.4. In conclusion, the Site is projected to achieve a significant level of Biodiversity Net Gain. While the assessment has been completed against detailed and outline proposals, reasonable and conservative assumptions have been made as to the extent and condition of new habitats.
- 6.5. It can be confidently stated that the results are in excess of the 20% net gain recognised by the Secretary of State as attracting 'substantial weight'.



## PLANS

## **PLAN ECO1**

Site Location and Ecological Designations



**KEY:**

- DETAILED APPLICATION BOUNDARY
- OUTLINE APPLICATION BOUNDARY
- SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)
- LOCAL NATURE RESERVE (LNR)
- COUNTY WILDLIFE SITE (CWS)
- ANCIENT WOODLAND



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PLAN ECO1: SITE LOCATION AND  
ECOLOGICAL DESIGNATIONS








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## **PLAN ECO2**

Ecological Features





- KEY:**
-  DETAILED APPLICATION BOUNDARY
  -  OUTLINE APPLICATION BOUNDARY
  -  BUILDING
  -  HARDSTANDING
  -  AMENITY GRASSLAND
  -  IVY
  -  TREE



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**PLAN ECO2:  
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