Futures Ecology Ltd
Carrwood Park
Selby Road
Leeds
LS15 4LG

Our Ref: FE452 / Brockley Terrace, Boldon Colliery / MB / JSE

Garry Simmonette
Case Officer
South Tyneside Council

16th January 2025

By email via Joe Fisher: joe@johnsonmowat.co.uk

Dear Joe,

BROCKLEY TERRACE, BOLDON COLLIERY (ST/0667/24/FUL) – RESPONSE TO COMMENTS

Following the recent comments from Shaun Hollern (Ecologist) regarding the submitted Preliminary Ecological Appraisal (PEA, Futures Ecology, October 2024) and Biodiversity Impact Assessment (BIA, Futures Ecology, October 2024), this letter seeks to address the points raised.

1.	***Preliminary Ecological Appraisal***
	The site is entirely classified as either Ruderal/ephemeral or Modified grassland. From looking at street view and the photos included, I want to highlight to the ecologist that they may consider reassessing the site as vacant/derelict land with some areas of developed land;sealed surface. Given the context of the site these feel more appropriate and prevent inflating the baseline.
	Biodiversity Net Gain
	Baseline Habitats *The baseline habitats on site comprise:* • *0.0558ha Ruderal/ephemeral in poor condition generating 0.11 area units* • *0.0236ha Modified Grassland in poor condition generating 0.05 area units* *In summary, the total baseline value of the site is 0.08 area units and 0 linear units. Through proposed works all units will be lost.* *The ecologist should consider whether derelict/vacant land with areas of developed land;sealed surface would be more appropriate. The total baseline figure may be reduced.*

The baseline equates to 0.16 Area Habitat Units (as stated in the BIA Report), rather than the 0.08 referred to in the comments.

The baseline habitats were mapped as 'Ruderal/Ephemeral' and 'Modified grassland' in 'Poor' condition. At the time of the Site visit (24.09.2024) the majority of the Site had at least some vegetation present. Furthermore, the areas of hardstanding which formed the base of previously

demolished structures, were degraded and unsealed. As such, if the habitats were reclassified as 'Vacant or derelict land', all areas within the redline would be grouped as this mosaic classification and no areas of sealed / unsealed surface would be separated out. It should also be noted that, even if the Site had been mapped as 'Vacant or derelict land' in 'Poor' condition (Passing criteria: C; Failing criteria: A, B), the Site baseline would remain the same (0.16 Area Habitat Units) This is because 'Ruderal/Ephemeral', 'Modified Grassland' and 'Vacant or derelict land' habitat types are all Low distinctiveness habitats and are given the same score of 2 in the metric. We acknowledge that urban sites of this type are often difficult to classify given their history and self-set vegetation, however, we do not accept that the baseline has been unnecessarily inflated in this instance.

2.	***Biodiversity Net Gain***
	Habitat Creation *Habitats proposed to be created comprise:* • *0.0017ha Modified Grassland in good condition generating 0 area units* • *0.0063ha Mixed Scrub in moderate condition generating 0.04 area units* • *0.0013ha Ground Based Green Wall in moderate condition generating 0 area units* • *0.0081ha Urban Tree in moderate condition generating 0.02 area units* *In summary, the habitats proposed for creation generate 0.08 area units and 0 linear units. Some habitats generate 0 units due to the small proposed size.* *Mixed scrub and modified grassland are essentially parts of a landscape scheme and given their sizes they are unlikely to deliver as habitats. For both habitats, I would consider that criteria A cannot be reached as neither would act as a good example of the habitat type. As such I would consider that both would reach poor condition at best. The figure must be recalculated or justification provided as to why moderate and good condition are possible.*

It should be noted that within the submitted metric calculation tool the proposed modified grassland had been given a 'Poor' target condition. This has been incorrectly referred to as 'Good' in the above comment. As such, we consider this comment to have been adequately addressed.

The mixed scrub habitat is considered likely to pass criteria A given the species mix and proposed management. We do acknowledge these areas are unlikely to pass criteria D and E, given their limited size and location. Nevertheless, we believe it is feasible to aim for 'Moderate' condition for this habitat type. Further justification is provided in the table below which considers the target habitat condition assessment.

Scrub Condition Assessment Criteria		**Notes**
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range). - At least 80% of scrub is native, - There are at least three native woody species,	Given the proposed species mix (hawthorn *Crataegus monogyna*, hazel *Corylus avellana*, crab apple *Malus sylvestris*, field maple *Acer campestre*, dogwood *Cornus sanguinea*) and management techniques, the scrub will meet the following: - UK Hab[1] definition of Mixed Scrub *(Dense scrub comprising a mixture of species without a single species dominant or stands*

[1] https://ukhab.org/

	- No single species comprises more than 75% of the cover (except hazel *Corylus avellana*, common juniper *Juniperus communis*, sea buckthorn *Hippophae rhamnoides* (only in its restricted native range), or box *Buxus sempervirens*, which can be up to 100% cover).	*with a dominant species not listed in h3a-h3k)*; - Be at least 80% native; - Have at least three native woody species; - No one single species will be more than 75% of the cover. As such, it is considered reasonable to suggest that the proposed scrub will meet this criterion.
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are all present.	Through proposed management, it is considered reasonable to suggest that the proposed scrub habitat will meet this criterion.
C	There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA5) and species indicative of suboptimal condition make up less than 5% of ground cover.	Given a lack of invasive non-native species currently, and with proposed mitigation measures, it is considered reasonable to suggest that the proposed scrub habitat will meet this criterion.
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	Given the area and location of the scrub, this criterion will not be targeted.
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Given the area and location of the scrub, this criterion will not be targeted.
Total criteria targeted		**3 (Moderate)**

3.	***Biodiversity Net Gain***
	The proposed landscape plan mentions hedgerow will be planted however this is not shown on the plan. It is not clear if this should be included and therefore if it should be added to the BNG assessment. Additionally, the proposed landscape plan mentions tree T02 (rowan) to be planted, but this is not shown on the map itself. For continuity this should be corrected.

The proposed landscaping plan submitted with the application, and which has been used for the BNG calculations is Drawing number 44/2404/PL_1400 (31/44 Architects). Tree T02 and hedgerows were shown on previous iterations, and seem to remain in the key, but are no longer included on the landscape plan. As such the BNG calculations are considered to align with the most up to date landscape plan which proposed 2 small trees and no hedgerows.

4.	***Biodiversity Net Gain***
	No condition assessments have been provided for the habitats despite moderate conditions being predicted, these are required.

Target condition assessment information is provided below.

Proposed Habitat	**Proposed Condition**	**Targeted Condition Criteria**
Modified grassland	**Poor** (Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	C, D, E, F, G

Mixed scrub	**Moderate** (Passes 3 or 4 criteria)	A, B, C
Ground based green wall	**Moderate** (Passes 2 of 3 core criteria; OR Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C)	B, C
Urban tree	**Moderate** (Passes 3 or 4 criteria)	A, B, D, F

I trust you will find the above satisfactory, however, if you would like to discuss anything please don't hesitate to contact me.

Yours sincerely,



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