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9th April 2025

REF: Boorley Green, Land at Oak & Apple Tree Cottage, Winchester Road, Boorley Green, Hampshire, SO32 2DH

F/24/97945 LAND ADJACENT TO OAK COTTAGE, WINCHESTER ROAD, BOORLEY GREEN, SO32 2DH

Erection of 52 retirement living apartments with associated communal facilities and car parking; the erection of a pair of detached dwellings; improved vehicular access and new pedestrian access to Winchester Road.

To whom it may concern,

Please find below responses to comments received from Liz Harrison, Principal Planning Officer, Eastleigh Borough Council on the 25th March 2025 in relation to Biodiversity Net Gain (BNG) for Land adjacent to Oak and Apple Cottage (application reference number F/24/97945), hereafter referred to as “the site”.

“[AspinallVerdi] have revised their appraisal and now conclude that a 100% private scenario is unviable due to increases in the retirement apartment build costs, changes to the developers return and increases to the overall S106 contributions sought. They do however consider the scheme to be deliverable and recommend that a viability review mechanism is included within the Section 106 agreement to allow the council to benefit from any favourable uplifts in viability.

The above conclusions are based on the S106 figures that are set out in their report, which includes a figure of £150,000 for off-site BNG mitigation. To enable this approach to be fully assessed (and before the issue of viability is concluded) please could you provide a revised copy of the Statutory Biodiversity Metric that includes the necessary information for the off-site BNG provision. I appreciate we have a copy of the Biodiversity Unit Allocation Agreement, but we also need the updated metric to reflect the proposed off-site solutions.”

Somerset Wildlife Trust Consultancy were instructed by McCarthy & Stone Retirement Lifestyles Limited (“the client”) to deliver a BNG assessment, including Statutory Metric Calculator (Boorley Green_The_Statutory_Biodiversity_Metric_Calculation_Tool_-_Macro_enabled_SWTC_V3) and report (Boorley Green_Biodiversity Net Gain Assessment_SWTC_V2), which have been submitted within the application. The metric indicated that the on-site proposals would result in the loss of 4.43 (-69.30%) area habitat, gain of 0.41 (+25.23%) linear habitat units, and neither area habitat nor linear habitat trading rules had been met (Image 1).

Boorley Green, Land at Oak & Apple Tr

Return to results menu

Headline Results

Scroll down for final results ▲

On-site baseline

Habitat units6.39

Hedgerow units1.62

Watercourse units0.00

On-site post-intervention

(Including habitat retention, creation & enhancement)

Habitat units1.96

Hedgerow units2.03

Watercourse units0.00

On-site net change

(units & percentage)

Habitat units-4.43

Hedgerow units0.41

Watercourse units0.00

-69.30%

25.23%

0.00%

On-site net gain is less than target set ▲

Off-site baseline

Habitat units0.00

Hedgerow units0.00

Watercourse units0.00

Off-site post-intervention

(Including habitat retention, creation & enhancement)

Habitat units0.00

Hedgerow units0.00

Watercourse units0.00

Off-site net change

(units & percentage)

Habitat units0.00

Hedgerow units0.00

Watercourse units0.00

0.00%

0.00%

0.00%

Combined net unit change

(Including all on-site & off-site habitat retention, creation & enhancement)

Habitat units-4.43

Hedgerow units0.41

Watercourse units0.00

Spatial risk multiplier (SRM) deductions

Habitat units0.00

Hedgerow units0.00

Watercourse units0.00

FINAL RESULTS

Total net unit change

(Including all on-site & off-site habitat retention, creation & enhancement)

Habitat units-4.43

Hedgerow units0.41

Watercourse units0.00

Total net % change

(Including all on-site & off-site habitat retention, creation & enhancement)

Habitat units-69.30%

Hedgerow units25.23%

Watercourse units0.00%

Total net gain achieved is less than target set ▲

Trading rules satisfied?

No - Check Trading Summaries ▲

Unit Type

Target

Baseline Units

Units Required

Unit Deficit

Habitat units

10.00%

6.39

7.03

5.07

Hedgerow units

10.00%

1.62

1.78

0.00

Watercourse units

10.00%

0.00

0.00

0.00

No additional hedgerow units required to meet target ✓

No additional watercourse units required to meet target ✓

Image 1 – Statutory Metric Calculator headline results

As detailed within the submitted report, an off-site solution will be required to achieve a minimum 10% net gain and comply with the statutory trading rules.

A viable BNG solution has been identified to meet statutory requirements, which is sufficient for planning determination. The site does not contain irreplaceable habitats or habitat features that would impact the decision-making process. As is standard practice, and supported by guidance from the Planning Advisory Service, a full and final BNG assessment, including a complete Statutory Metric Calculator and Biodiversity Gain Plan, will

be submitted post-consent to discharge the Biodiversity Gain Condition attached to any approved decision notice. The current Statutory Metric Calculator is based on the current site proposals at the time of planning submission. As is common with developments of this nature, minor alterations to the design are anticipated post-consent, including details which are to be conditioned, which may affect the final on-site BNG calculations. As off-site unit purchase requirements are wholly dependent on the final performance of the on-site proposals, this is why the full and final BNG calculations, including completion of off-site tabs, will be confirmed as part of the post-consent condition discharge process.

Notwithstanding the above, the client has provided pre-planning information beyond statutory minimum in the form of a Biodiversity Unit Allocation Agreement with a suitable off-site unit provider, Kings Manor Farm habitat bank (National Biodiversity Gain Sites Register reference BGS-100624001), hereafter referred to as “the habitat bank”. Due to the location of the habitat bank relative to the site, the appropriate spatial risk multiplier has been factored into discussions with the habitat bank. The unit deficiencies identified in the Statutory Metric Calculator results tabs, including the trading results tabs, have been explicitly used to inform negotiations and the preparation of a quotation from the habitat bank. The habitat bank has confirmed that they have suitable unit types and quantities to address the identified deficit and facilitate the required biodiversity net gain. While the Biodiversity Unit Allocation Agreement lists other neutral grassland, the habitat bank provider has confirmed this is only an example, and exact habitat types would be agreed upon at the point of trade. The habitat bank provider has confirmed they have the necessary range of unit types available to ensure compliance with the statutory trading rules, and for example may use a range of different unit types to offset the low distinctiveness unit types required within the current Statutory Metric Calculator. In addition to the unknown final on-site performance of the proposed development, and therefore confirmation of off-site unit requirements as detailed above, as exact off-site unit types have not yet been agreed upon, accurate completion of the off-site tabs of the Statutory Metric Calculator is not currently possible.

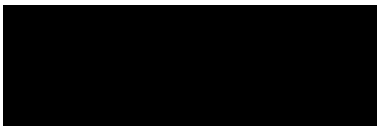
At the point of unit acquisition, the client intends to finalise the specific unit types in collaboration with the habitat bank to ensure they align with both the requirements of the habitat bank and the final on-site biodiversity metric performance following detailed design and conditioned elements.

The Biodiversity Unit Allocation Agreement includes indicative costings for unit purchase to meet the outstanding requirements of the current BNG calculator. Such costs, directly correlated with the current unit and/or trading rule deficiencies within the submitted Statutory Metric Calculator, show an indicative off-site unit purchase price of £209,200+VAT (comprised of £205,200 credit purchase, management and processing fees plus £4,000 legal arrangement fee) based on a unit sale completion date of 31st August 2025. An additional £23,190+VAT would be incurred if such completion is extended to 28th February 2026, totalling £232,390+VAT. To confirm, the BNG off-site unit purchase cost estimate should not form part of any Section 106 (S106) financial contribution sums, only facilitate assessment of the other S106 contributions in relation to the development. Whilst a local planning authority may wish to secure funding to monitor and/or enforce the long-term maintenance of on-site BNG within a S106 agreement, in this instance given the enhanced and created on-site net gain elements are not considered significant in relation to the pre-development biodiversity value (the gain will be achieved via purchase of off-site units), this is not considered necessary. Monitoring of any off-site unit purchase is already secured by the habitat bank with their chosen Monitoring Authority (i.e. a Local Planning Authority or Responsible Body). If however such contributions to monitor created or enhanced on-site habitats were required, this would increase the costs to deliver BNG for the development currently listed above in relation to the assessment of financial viability and wider S106 contributions.

Given this, it is not considered necessary, proportionate nor possible to accurately complete the off-site tabs within the metric calculator at this stage. The final Statutory Metric Calculator, including the completed off-site tabs, will be submitted at the point of unit purchase (the cost of which is considered to be analogous to the current Allocation Agreement provided by the habitat bank) and as part of the Biodiversity Gain Plan required to discharge the relevant planning condition.

We trust that this response adequately addresses the query raised in relation to off-site unit purchase costs to complete the assessment of financial viability in relation to S106 contributions. Should you require any further clarification, please do not hesitate to contact me.

Kind regards,



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Reviewed by Stephanie Bentham-Green ACIEEM, Principal Ecologist at Somerset Wildlife Trust Consultancy on the 7th April 2025.