

Durrington Gasworks (Elizabeth Square
Phase 2)

Preliminary Ecological Appraisal

April 2026

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Executive Summary

- i) **Introduction.** Aspect Ecology was commissioned to undertake a Preliminary Ecological Appraisal in respect of proposed development of land at the former Durrington Gasworks (Elizabeth Square Phase 2). The site is being considered for residential and commercial development.
- ii) **Survey.** The site was surveyed in October 2025 with mapping of habitats based on the UK Habitat Classification system. In addition, a general appraisal of fauna was undertaken to record the potential presence of any protected, rare or notable species, with specific preliminary surveys conducted in respect of bats, Badger and Reptiles. Desk study information has also been gathered from the local records centre and online resources.
- iii) **Ecological Designations.** The site itself is not subject to any statutory or non-statutory ecological designations. The nearest statutory designation is Cissbury Ring Site of Special Scientific Interest (SSSI), located approximately 4.8km north-east of the site. The site is relatively unconstrained in relation to statutory and non-statutory designations. The nearest non-statutory designation is Goring and Ferring Gap Local Wildlife Site (LWS) located 0.97 km south-west of the site. All of the ecological designations in the surrounding area are physically well separated from the site and are unlikely to be adversely affected by the proposals.
- iv) **Habitats.** The site is dominated by three distinct land parcels comprising tall forb, hardstanding, grassland, mixed and coniferous woodland and trees. No habitats were recorded to be important ecological features. It is recommended that boundary features are retained where possible to ensure that green links are maintained around the site.
- v) **Protected Species.** The site largely offers minimal opportunities for faunal species, being located in an urban context, and dominated by common and widespread habitats. Some limited opportunities are present for protected and notable fauna including roosting bats as such precautionary mitigation measures are proposed to minimise impacts on such species.
- vi) **Summary.** In summary, the proposals have sought to minimise impacts on biodiversity and subject to the implementation of appropriate avoidance and mitigation, the proposals would not result in significant harm to biodiversity.

1 Introduction

1.1 Background

- 1.1.1 Aspect Ecology was commissioned by Bellway Homes Ltd to undertake a Preliminary Ecological Appraisal in respect of proposed development of land at the former Durrington Gasworks (Elizabeth Square Phase 2) centred at grid reference TQ 11537 03091 (see Plan 7111/ECO1), hereafter referred to as 'the site'.

1.2 Site Overview

- 1.2.1 The site is located in the west of the town of Worthing, within the ward of Goring-by-Sea. The site is located within an urban context and is bound to the north and west by commercial development and a railway line, while residential development and an active construction site are located adjacent to the south and east of the site, beyond which lies existing residential and commercial development. The wider landscape primarily comprises residential-led built development within Goring-by-Sea.
- 1.2.2 The site itself is a former gas-works, and is dominated by grassland, hardstanding and areas of land dominated by tall forbs. Tree lines are present, dividing the site into the different field parcels, with small pockets of woodland also present.

1.3 Purpose of the Report

- 1.3.1 This report documents the methods and findings of the preliminary ecology surveys and desktop study carried out in order to establish the existing ecological interest of the site. The importance of the habitats and species present is evaluated. Habitats are also assessed under Statutory Biodiversity Metric Guidance to inform the pre-development biodiversity value of the site in regard to Biodiversity Net Gain (BNG). Where necessary, recommendations are proposed for further survey work, together with avoidance, mitigation and compensation measures.

2 Methodology

2.1 Desktop Study

- 2.1.1 In order to compile background information on the site and its immediate surroundings, Sussex Biodiversity Record Centre (SxBRC) was contacted in September 2025. Data was requested from within a search area extending 2km from the centre of the site.
- 2.1.2 Information on statutory designations was obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC) database¹, which uses data provided by Natural England, from within a search area extending to 25km from the site. The MAGIC database was also searched to identify the known presence of any Priority Habitats within or adjacent the site.
- 2.1.3 In addition, the Woodland Trust database² was searched for any records of ancient, veteran or notable trees within or adjacent to the site.
- 2.1.4 The information received from these organisations is discussed in the text and reproduced where appropriate on Plan 7111/ECO2.

2.2 Habitat Surveys

- 2.2.1 The site was surveyed in October 2025 in order to ascertain the general ecological value of the land contained within the boundaries of the site and to identify the main habitats and ecological features present.
- 2.2.2 The survey was informed by Phase 1 Habitat Survey methodology³, with habitat types identified and mapped in accordance with the UK Habitat Classification system (version 2.0)⁴, together with an assessment of the species composition of each habitat. This technique provides an inventory of the habitat types present and allows identification of areas of greater potential for botanical interest which require further survey. Any such areas identified can then be examined in more detail through Phase 2 surveys. This method was extended, in line with the Guidelines for Preliminary Ecological Appraisal⁵ to record details on the actual or potential presence of notable or protected species.
- 2.2.3 In line with guidance⁶, the fine scale minimum mapping unit of 25sqm or 5m in length has been used where appropriate.
- 2.2.4 The nomenclature used for plant species is based on the Botanical Society for the British Isles (BSBI) taxon list⁷.

¹ Multi-Agency Geographic Information for the Countryside (MAGIC), at <https://magic.defra.gov.uk/>

² Woodland Trust Ancient Tree Inventory, at <https://ati.woodlandtrust.org.uk/>

³ Joint Nature Conservation Committee (2010, as amended) *Handbook for Phase 1 habitat survey: A technique for environmental audit*.

⁴ UKHab Ltd (2023). *UK Habitat Classification Version 2.0* (at <https://www.ukhab.org>)

⁵ Chartered Institute for Ecology and Environmental Management (CIEEM) (2013) *Guidelines for Preliminary Ecological Appraisal*.

⁶ *The UK Habitat classification User Manual*. Version 1.1. 2020

⁷ <https://bsbi.org/taxon-lists>

Habitat Condition Assessment

- 2.2.5 To determine the pre-development biodiversity value of the site for the BNG calculation, the condition of habitats has been assessed in accordance with the methodology set out in the Statutory Biodiversity Metric Technical Annex⁸ and using professional judgement. Condition assessment data was collected during the October 2025 survey.
- 2.2.6 Grassland habitats have been surveyed based on the approach set out within the Farm Environment Plan (FEP) Manual⁹, allowing an assessment of species per m² and frequency of indicator species. A transect was walked through each of the main fields within the site, with ten stopping points to record species within a 1x1m quadrat. An assessment of frequency can then be made based on occurrence at each 1x1m quadrat, with frequent species occurring in five or more quadrats out of ten, occasional species occurring in three or four quadrats, and rare species occurring in one or two quadrats.
- 2.2.7 The grassland survey was undertaken by an ecologist with over 10 years' experience of habitat and botanical surveys across the UK.

2.3 Faunal Surveys

- 2.3.1 General faunal activity, such as mammals or birds observed visually or by call during the course of the surveys was recorded. Particular attention was also paid to the potential presence of protected, rare or notable species, with specific preliminary survey work undertaken for bats, Badger and Great Crested Newt, as described below.

Bats¹⁰

Preliminary Appraisal

- 2.3.2 A review was undertaken of the desk study information obtained to identify any known constraints in relation to bats, the bat species recorded and habitats likely to be used by bats within the site and the surrounding area. This included a review of background records, known designations including SACs or SSSIs relevant to bats and an appraisal of OS mapping and aerial photography to identify habitats likely to be of value to bats.
- 2.3.3 During the initial habitat survey, the potential suitability of the site for bats in relation to roosting habitats, potential flight-paths and foraging habitats (termed a 'daytime bat walkover') was investigated. Features were assessed as of negligible, low, moderate or high potential suitability for roosting, foraging and commuting, based on the framework set out under BCT guidance. This appraisal has informed the scope of the survey work undertaken as set out below.

Trees

- 2.3.4 Trees were assessed for their suitability to support roosting bats based on the presence of features such as holes, cracks, splits or loose bark. Trees were categorised as supporting

⁸ Statutory Biodiversity Metric – Technical Annex 1 – Condition Assessment Sheets and Methodology

⁹ Natural England (2010) Higher Level Stewardship – Farm Environment Plan (FEP) Manual, 3rd Edition

¹⁰ Surveys based on: Reason, P.F. and Wray, S. (2023) UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. CIEEM; and Bat Conservation Trust (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn).

Potential Roost Features (PRFs), Further Assessment Required (FAR) or supporting no suitable features.

- 2.3.5 Trees were subject to a Ground Level Tree Assessment (GLTA) based on relevant guidance¹¹ with PRFs categorised as PRF-I (only suitable for individual or small numbers of bats) or PRF-M (suitable for multiple bats). Any PRFs identified were inspected using binoculars from ground level for any signs indicating possible use by bats, such as staining, scratch marks or bat droppings. Where accessible from ground level, PRFs were subject to close inspection using a torch.

Badger (*Meles meles*)¹²

- 2.3.6 A Badger survey was carried out during the habitat survey in October 2025. The survey comprised two main elements. The first element involved searching for evidence of Badger setts. For any setts that were encountered, each sett entrance was noted and mapped. The second element involved searching for signs of Badger activity such as well-worn paths and push-throughs, snagged hair, footprints, latrines and foraging signs, so as to build up a picture of any use of the site by Badger.

Great Crested Newt (*Triturus cristatus*)

- 2.3.7 As a first step in assessing the possible presence of Great Crested Newt at the site, Ordnance Survey mapping and satellite imagery were examined to identify water bodies within 500m of the site boundary.
- 2.3.8 Guidance set out within Natural England's Method Statement template, to be used when applying for a Great Crested Newt development licence, states that surveys of ponds within 500m of the site boundary are only required *"when all of the following conditions are met: (a) maps, aerial photos, walk-over surveys or other data indicate that the pond(s) has potential to support a large great crested newt population, (b) the footprint contains particularly favourable habitat, especially if it constitutes the majority available locally, (c) the development would have a substantial negative effect on that habitat, and (d) there is an absence of dispersal barriers."*
- 2.3.9 Given that in this instance, the four points listed above are not all applicable to the site, it is considered that survey of ponds within 500m of the site boundary is not required, and that survey of ponds within 250m¹³ represents adequate survey effort.

Habitat Suitability Index (HSI)

- 2.3.10 Where access was available, identified ponds were then subject to a Habitat Suitability Index (HSI) assessment. The HSI is used to assess the likely suitability of water bodies to support Great Crested Newt. The HSI is a score derived from ten component factors that are each scored separately according to the standard method. These are:
- *SI1 Location*. The location of the water body within Great Britain;
 - *SI2 Pond area*. The size of the water body;

¹¹ Bat Conservation Trust (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn).

¹² Based on: Mammal Society (1989) Occasional Publication No. 9 – Surveying Badgers

¹³ 250m is the typical maximum migratory range of this species, see English Nature (2004) 'An assessment of the efficiency of capture techniques and the value of different habitats for the great crested newt *Triturus cristatus*'. English Nature Research Report 576

- *SI3 Permanence*. How often the water body dries out;
- *SI4 Water Quality*. The water quality, based primarily on invertebrate diversity;
- *SI5 Shade*. The percentage of the perimeter of the water body that is shaded;
- *SI6 Fowl*. The presence or absence of water fowl;
- *SI7 Fish*. The presence or absence of fish;
- *SI8 Pond Count*. The number of water bodies within 1km of the surveyed water body (not counting those on the far side of major barriers such as roads);
- *SI9 Terrestrial*. The quality of terrestrial habitat surrounding the water body; and
- *SI10 Macrophytes*. The percentage cover of the surface area of the water body by macrophytes (aquatic plants).

2.3.11 The overall HSI is then determined by combining scores for the above criteria into an equation devised by Oldham *et al.* (2000)¹⁴. The HSI score corresponds with a measure of the suitability of the water body to support Great Crested Newt of either 'poor', 'below average', 'average', 'good' or 'excellent'.

2.3.12 The HSI study was undertaken in line with the guidelines developed by Oldham *et al.* and subsequently adapted by ARG UK (2010)¹⁵. A suitably experienced ecologist undertook the assessment, informed by desktop research where appropriate.

2.4 Survey Constraints and Limitations

2.4.1 Not all of the species that occur in each habitat will necessarily be present or detectable during survey work carried out at any given time of the year, since different species are apparent during different seasons.

2.4.2 The habitat survey was undertaken outside the optimal season. However, the broad habitat types present within the site were able to be identified sufficiently for the purpose of this report, and to enable an adequate assessment of the intrinsic ecological interest of the site to be made.

2.4.3 Note was made of any invasive species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) that were observed during surveys. However, because the detectability of such species varies according to factors such as the time of year or site management regime, the absence of invasive species should not be assumed even if no such species were recorded during the surveys undertaken.

2.5 Ecological Evaluation Methodology

2.5.1 The evaluation of ecological features and resources is based on professional judgement whilst also drawing on the latest available industry guidance and research. The approach taken in this report is based on that described by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018)¹⁶, which identifies 'important ecological

¹⁴ Oldham RS, Keeble J, Swan MJS & Jeffcote M (2000) *Evaluating the suitability of habitat for the Great Crested Newt (Triturus cristatus)*. Herpetological Journal 10 (4), 143-155

¹⁵ Amphibian & Reptile Groups of the UK (2010) ARG UK Advice Note 5: Great Crested Newt Habitat Suitability Index

¹⁶ CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine, ver. 1.3 (updated September 2024)

features' within a defined geographical context (i.e. international, national, regional, county, district, local or site importance). Further details are provided at Appendix 7111/1.

2.6 Relevant Planning Policy

National Policy Approach to Biodiversity in the Planning System

2.6.1 The National Planning Policy Framework (NPPF)¹⁷ describes the Government's national policies on 'conserving and enhancing the natural environment' (Chapter 15). NPPF is accompanied by Planning Practice Guidance on 'Biodiversity, ecosystems and green infrastructure' and ODPM Circular 06/2005¹⁸.

2.6.2 NPPF takes forward the Government's strategic objective to halt overall biodiversity loss¹⁹, as set out at Paragraph 187, which states that planning policies and decisions should contribute to and enhance the natural and local environment by:

'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'

2.6.3 The approach to dealing with biodiversity in the context of planning applications is set out at Paragraph 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*

¹⁷ Ministry of Housing, Communities & Local Government (2024) *National Planning Policy Framework*

¹⁸ ODPM (2006) Circular 06/2005: Planning for Biodiversity and Geological Conservation – A Guide to Good Practice

¹⁹ DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services

can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.'

2.6.4 The above approach encapsulates the 'mitigation hierarchy' described in British Standard BS 42020:2019²⁰, which sets out the following step-wise process:

- **Avoidance** – avoiding adverse effects through good design;
- **Mitigation** – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
- **Compensation** – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm; and
- **Enhancement** – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

2.6.5 The measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the type and scale of the proposed development (BS 42020:2019, section 5.5).

Local Policy

2.6.6 Relevant policies within Worthing Borough Council are set out within the saved policies of the adopted Local Plan 2020-2036, adopted in March 2023. Ecology and Biodiversity related policies are detailed below. Additionally, the site has been allocated for development within the Local Plan, further details can be found below.

Policy DM18 relates to Biodiversity and states:

- a) "Planning applications should be supported by relevant environmental information, which is informed by appropriate up-to-date ecological information, prior to determination.
- b) All development should ensure the protection, conservation, and enhancement of biodiversity. If significant harm cannot be avoided (by locating development on an alternative site with less harmful impacts or through design), then such harm should be adequately mitigated. Where it cannot be adequately mitigated then as a last resort such harm must be compensated for. Where it cannot be compensated for, then planning permission should be refused. This process is known as the mitigation hierarchy.
- c) Developments which would adversely affect a Site of Special Scientific Interest (SSSI) (individually or cumulatively) will not normally be permitted. Exceptions will only be made where the benefits of the development on the particular site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts. Where an exception is considered the mitigation hierarchy will apply.

²⁰ British Standards Institution (2013) Biodiversity – Code of practice for planning and development, BS 42020:2019

- d) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) will be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- e) Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Local Wildlife Site, wildlife corridors, stepping stones or Local Geological Site will not be permitted unless it can be demonstrated the benefits of the proposal outweigh the need to safeguard the nature conservation value of the site/feature. Where an exception is considered the mitigation hierarchy will apply.
- f) Development that is likely to have an adverse effect on notable and priority habitat or species will not be permitted unless it can be demonstrated the benefits of the proposal outweigh the need to safeguard the nature conservation value of the site/feature. Where an exception is considered the mitigation hierarchy will apply.
- g) Where relevant, new development adjacent to the coast will have to demonstrate how it is reducing the impacts of coastal squeeze.
- h) New developments (excluding change of use and householder) should provide a minimum of 10% net gain for biodiversity - where possible this should be onsite. Where it is required/necessary to deliver biodiversity net gain offsite this should be part of a strategic ecological network having regard to Green Infrastructure and Local Nature Recovery strategies. Where it is achievable, a 20%+ onsite net gain is encouraged and is required for development on previously developed sites. Major developments will be expected to demonstrate this at the planning application stage using biodiversity metrics. This should be accompanied by a long term management plan.
- i) Where appropriate, the Council will use planning conditions or obligations to provide appropriate enhancement and site management measures, and where impacts are unavoidable, mitigation or compensatory measures."

Allocated Sites – A10 Martlets Way

2.6.7 As previously mentioned, the site is allocated for under the local plan under 'A10 Martlets Way'. The site was previously allocated predominantly for commercial development with a number of residential units. Within the local plan, details of the allocated site include site description, constraints and future development proposal requirements. The biodiversity related development requirement is stated below:

- *"Development proposals should ensure the protection and enhancement of existing biodiversity assets in line with Policy DM18, including the provision of biodiversity net gain. Protect mature Ilex oak trees that separate the former gas holder site from the former sewage treatment works (subject to appropriate assessment work). New green infrastructure should be delivered that provides opportunities to link to the Borough-wide green infrastructure network."*

3 Ecological Designations

3.1 Statutory Designations

- 3.1.1 The statutory designations of ecological importance that occur within the local area around the site are shown on Plan 7111/ECO2.
- 3.1.2 The nearest statutory nature conservation designation to the site is Cissbury Ring Site of Special Scientific Interest (SSSI). This designation is located approximately 4.8km north-east of the site. The SSSI is designated for its archaeological importance and for comprising nationally rare unimproved chalkland grassland habitat.
- 3.1.3 The next nearest statutory designation is Lancing Ring Local Nature Reserve (LNR), located approximately 6.6km east of the site.
- 3.1.4 The next nearest European designation is Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar, located approximately 12.7km north-west of the site.
- 3.1.5 Natural England has developed Impact Risk Zones (IRZs) as an initial tool to help assess the risk of developments adversely affecting SSSIs, taking into account the type and scale of developments. The site does not sit within an IRZ for residential or commercial development.

Assessment of Proposals

- 3.1.6 The site itself is not subject to any statutory nature conservation designations. The site is not situated within any impact risk zones for residential or commercial development therefore is unlikely to impact statutory designations.
- 3.1.7 Additionally, the site is surrounded by pre-existing urban residential and commercial development and has been allocated for development within the local plan. As such, the proposed development would be of minimal impact to statutory designations as most statutory designations are well separated from the site and are unlikely to be affected by the proposals.

3.2 Non-statutory Designations

- 3.2.1 The non-statutory designations of nature conservation interest that occur within the local area are shown on Plan 7111/ECO2.
- 3.2.2 The nearest non-statutory nature conservation designation to the site is Goring and Ferring Gap Local Wildlife Site (LWS), which is located approximately 0.97 km south-west of the site. The LWS is designated for its importance for birds, particularly wintering birds, with 25% of species in Sussex recorded using the site.
- 3.2.3 The next nearest non-statutory nature conservation designation to the site is Hams Farm Wood Local Wildlife Site (LWS), located approximately 0.97 km north of the site, comprising the only Ancient Woodland area within Worthing.

Assessment of Proposals

- 3.2.4 The site itself is not subject to any non-statutory nature conservation designations. All non-statutory designations in the surrounding area are well separated from the site by

existing residential and commercial development and are therefore unlikely to represent a significant constraint to development at the site.

3.3 Priority Habitats, Ancient Woodland and Notable Trees

3.3.1 No Priority Habitats are identified within the site according to the MAGIC database, while no areas of identified ancient woodland lie within or in close proximity to the site.

3.3.2 There are no records of any notable or veteran trees within or adjacent to the site.

Assessment of Proposals

3.3.3 Priority Habitats and ancient woodland are unlikely to represent a significant constraint as they are well separated from the site by pre-existing development.

3.4 Summary

3.4.1 The site itself is not subject to any statutory or non-statutory ecological designations and local designations and priority habitats are well separated from the site by pre-existing development, as such the proposals are unlikely to represent a significant constraint.

4 Habitats and Ecological Features

4.1 Background Records

- 4.1.1 No specific records of any protected, rare or notable plant species from within or immediately adjacent to the site are included within the information returned from the Records Centre. A number of records of Priority Species and other notable species were returned from the wider area, primarily relating to coastal, woodland and urban environments. No evidence for the presence of any of these species within the site was recorded during the survey work undertaken.

4.2 Overview

- 4.2.1 The site predominantly comprises three distinct land parcels comprising tall forb, hardstanding, grassland, mixed and coniferous woodland and trees. The locations of habitat types and features within the site are indicated on Plan 7111/ECO3.

4.3 Priority Habitats

- 4.3.1 Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 places duties on public bodies to have regard to the conservation of biodiversity in the exercise of their normal functions. In particular, Section 41 of the NERC Act requires the Secretary of State to publish a list of habitats which are of principal importance for conservation in England. This list is largely derived from the 'Priority Habitats' listed under the former UK BAP, which continue to be regarded as priority habitats under the subsequent country-level biodiversity strategies.
- 4.3.2 Of the habitats within the site, no habitats are considered to qualify as Priority Habitats or constitute important ecological features. This is discussed further in the relevant habitat sections below.

4.4 Irreplaceable Habitats

- 4.4.1 Irreplaceable habitats are now defined under The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and include blanket bog, lowland fens, limestone pavements, coastal sand dunes, ancient woodland, ancient trees and veteran trees, spartina saltmarsh swards and mediterranean saltmarsh scrub.
- 4.4.2 No irreplaceable habitats are present within the site.

4.5 Habitat Descriptions and Evaluation

- 4.5.1 The habitats and ecological features present within the site are described in Table 4.1 below. This table sets out their UK Habitat Classification Primary Habitats and Secondary Codes, and the corresponding habitat type and condition according to the Statutory Biodiversity Metric. The table also indicates whether these habitats constitute an important ecological feature and sets out their level of importance, taking into account the status of habitat types and the presence of rare plant communities or individual plant species of elevated interest. The value of habitats for the fauna they may support is considered separately in Chapter 5 below.

Table 4.1a. Habitat Descriptions and Evaluation – Area Habitats

Ref	UK Hab Primary Habitat/ Secondary Codes*	Description	Evaluation
G2, MG1	g2 modified grassland 106	The two fields in the eastern half of the site (G2 and MG1), predominantly comprise modified grassland. Grassland G2 is located in the north of the site within the SGN former gas works land and has a uniform sward height of between 30cm and 40cm. The grassland has evidence of previous mowing management and is associated with a small dry ditch along the western field boundary, filled with small amounts of rubbish and brash with an earth mound along its eastern bank. The sward was dominated by Yorkshire Fog with additional species such as Bramble, Perennial Ryegrass, Creeping Buttercup, Dock sp., Ribwort Plantain, Cock's-foot and Vetch sp. Grassland MG1 is a uniform patch of modified grassland located in the southern section of the site, associated with the site office and car parking area. Species included Creeping Bent, Yorkshire Fog, Dock sp., Ragwort, Clover, Bramble, False Oat-grass, Creeping Buttercup and Cock's-foot.	Does not form important ecological feature
G1, G3, G4	g3c other neutral grassland 106	Within the site there are three areas of other neutral grassland, including grassland G1, G3 and G4. Grassland G1 is situated within the centre of the site within the SGN former gas works land and has a varied grassland sward with a height of between 5cm and 20cm. The grassland had signs of physical damage which included rubble piles, sand spoil heaps and evidence of previous mowing management. The grassland was dominated by Yorkshire Fog with Cock's-foot, Doves-foot Crane's-bill, C Vetch, Hogweed, Ragwort, Ribwort Plantain, Pill Sedge, Spurge sp., Herb Robert, Red Dead-nettle, Primrose, Creeping Cinquefoil, Bramble, Dandelion, Dock, Cleavers, Field Bindweed, Bristly Oxtongue, Sticky Groundsel, Fumitory sp., Bird's-foot Trefoil and Fleabane. The sward was categorised as other neutral grassland based on its species richness (9sp/m2) and for comprising of greater than 20% herbs and less than 30% perennial Rye-grass and White Clover. Grassland G3 is located within the east of the site within the SGN Former Gas Works land and has a uniform short sward with a height of between 15cm and 20cm. The grassland has also colonised two bunds, which were produced during the occupation of the former gas works. Species present within the grassland include Yorkshire Fog, Cock's-foot, Perennial Rye-grass, Creeping Bent, Bristly Oxtongue,	Does not form important ecological feature

Ref	UK Hab Primary Habitat/ Secondary Codes*	Description	Evaluation
		Bramble, Ribwort Plantain, Creeping Cinquefoil, Fleabane, Oxeye Daisy, Vetchling, Dock sp., C Vetch, Ivy, Vetchling sp., Dandelion and mosses. The sward was categorised as other neutral grassland based on its species richness (8-9sp/m2) and for comprising of greater than 20% herbs and less than 30% perennial Rye-grass and White Clover. Grassland G4 is a round area surrounded by G3 grassland in the SGN former gas works land. The grassland is uniform short sward with frequent exposed substrate cobbles with wood and brash. Within the grassland there are distinct patches of Upright Brome, Gorse, Dandelion, Aspen, C Century and St John's Wort while other species present include Ragwort, Bramble, Ribwort Plantain, Creeping Cinquefoil, Bird's-foot Trefoil, Yorkshire Fog, Red Clover, Weld?, Dog-rose, Oxeye Daisy, Pignut, Red Fescue, Mosses, Tansy, Perennial Rye-grass, Cock's-foot, Rough Meadowgrass, Fumitory sp. and Cotoneaster. The sward was categorised as other neutral grassland based on the presence of at least 1 grass species not associated with intensive agriculture and for comprising of greater than 20% herbs and less than 30% perennial Rye-grass and White Clover.	
HS1, HS2	u1b6 developed land; sealed surface; other developed land - hardstanding	A number of hardstanding areas are present across the site, with a gravel access road and concrete paving in the SGN former gas works area. The concrete paving area was colonised by stone crop and species consistent with grassland G3. An additional area of gravel hardstanding is also present in the west of the site, associated with storage containers, skips and a number of concrete blocks.	Does not form important ecological feature
W1a	w1h5 other woodland; mixed; mainly broadleaved	A small area of largely non-native mixed woodland is located along the western boundary of the SGN former gas works land. The woodland structure comprises only of a Holm Oak canopy layer with an Elder understory layer. The ground flora was limited under the canopy however more ground flora was present in the clearing. Ground flora species within the woodland included Field Bindweed, Bramble, Cleavers, Ivy and Garlic Mustard. Building B1 (sub-station) is located within the southern section of the woodland.	Does not form important ecological feature
W1b	w2c other coniferous woodland	A small area of largely non-native coniferous woodland is located between grasslands G1 and G2. The woodland structure comprised largely semi-mature and mature canopy trees with limited understory and ground flora present. The canopy was dominated by non-native Cypress with Silver Birch and the understory comprised Elder and Holly. The ground was largely bare ground with leaf litter and occasional ground flora species including Garlic Mustard, Ivy, Common Nettle, Herb Robert and Bramble. There was occasional deadwood scattered throughout the woodland.	Does not form important ecological feature

Ref	UK Hab Primary Habitat/ Secondary Codes*	Description	Evaluation
-	Bramble Scrub	A small area of bramble scrub is present behind concrete blocks along the west of the site, associated with an area of hard standing in the west of the site.	Does not form important ecological feature
-	(tall forbs) 16	Two areas of tall forb were recorded on-site, a large field of tall forb in the west of the site and a small patch in the east of the site associated with a substation structure (B2). The large area of tall forbs in the western section of the site within Martlets Way land was recolonised ground dominated by tall forb and herb species including Hogweed, Bramble, Willowherb, Dock sp., Common Nettle, Bristly Oxtongue, Purple Toadflax, Wild Carrot, Primrose, Small Mellic, Creeping Cinquefoil, Fumitory sp., Goosefoot sp., Bird's-foot Trefoil, C Vetch, Germander Speedwell, Mugwort, Cock's-foot, False Oat-grass, Field Bindweed, Burdock, Bedstraw sp., Knotgrass sp., Reedgrass sp., St John's-wort, Creeping Thistle, White Clover, Mallow, Yarrow, Teasel, Herb Robert, Rapeseed, Buddlejia, Weld, Dove's-foot Crane's-bill, Mayweed and Valerian. The substation (B2) in the east of the site is surrounded by tall forb with patches of bare ground. Species present within the tall forb include Teasel, Bristly Oxtongue, Fat Hen, Common Nettle, Wild Carrot, Dock sp., Fleabane, Oxeye Daisy and Ribwort Plantain.	Does not form important ecological feature
-	(trees) 200	A number of individual trees are present within the site associated with field boundaries, comprising semi-mature to mature specimens of non-native Cypress.	Does not form important ecological feature

* Habitat types not listed as a primary habitat are indicated in brackets

UK Hab Secondary Codes:

16 – tall forbs

200 – tree

106 - mown

Table 4.1b. Habitat Descriptions and Evaluation – Hedgerows/Line of Trees

Ref	UK Hab Primary Habitat/ Secondary Codes*	Description	Evaluation
TL1, TL2	Non-native Tree Lines 33	TL1 and TL2 are located in the east of the site predominantly on the boundary of SGN former gas works land and the NIB land. Such lines of trees largely comprise of non-native Holm Oak with occasional silver birch trees. The ground flora around TL1 and TL2 is largely absent with ground being largely bare with leaf litter. Access to TL2 was restricted due to tree protection fencing.	Does not form important ecological feature

* Habitat types not listed as a primary habitat are indicated in brackets

4.6 Summary

- 4.6.1 On the basis of the above, there are no habitats within and adjacent to the site that are considered to form important ecological features.

4.7 Assessment of Proposals

- 4.7.1 The proposed development has followed the mitigation hierarchy approach as set out under the National Planning Policy Framework (NPPF), with consideration given first to avoidance, followed by mitigation and compensation.
- 4.7.2 In line with this hierarchy, habitats of more elevated value (the trees and tree lines, which although not qualifying as important ecological features do offer some opportunities for wildlife, and these are retained where possible) avoiding significant habitat losses, with built development focused within areas of lower value habitat including modified grassland and tall forbs. Losses of these habitats, not forming important ecological features, will be addressed as part of the overall balance of biodiversity net gain.
- 4.7.3 Recommendations are set out in section 6 to ensure that retained trees and treelines are fully safeguarded.

5 Faunal Use of the Site

5.1 Overview

- 5.1.1 During the survey work, general observations were made of any faunal use of the site with particular attention paid to the potential presence of protected or notable species. Specific preliminary survey work was undertaken in respect of Badgers and bats, the results of which are set out below.

5.2 Priority Species

- 5.2.1 Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 places duties on public bodies to have regard to the conservation of biodiversity in the exercise of their normal functions. In particular, Section 41 of the NERC Act requires the Secretary of State to publish a list of species which are of principal importance for conservation in England. This list is largely derived from the 'Priority Species' listed under the former UK BAP, which continue to be regarded as Priority Species under the subsequent country-level biodiversity strategies.
- 5.2.2 The site has potential to support a number of Priority Species, including bat species, Badger, Hedgehog and Reptiles. This is discussed further below.

5.3 Bats

- 5.3.1 **Legislation.** All British bats are classed as European Protected Species under the Conservation of Habitats and Species Regulations 2017 (as amended) and are also listed under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). As such, both bats and their roosts (breeding sites and resting places) receive full protection under the legislation (see Appendix 7111/2). If proposed development work is likely to result in an offence a licence may need to be obtained from Natural England which would be subject to appropriate measures to safeguard bats. Given all bats are protected species, they are considered to represent important ecological features. Several bat species are also S41 Priority Species.
- 5.3.2 **Background Records.** No specific records of bats from within the site were returned from the desktop study. A number of records within 2km included Brown Long-eared Bat *Plecotus auritus*, Whiskered Bat *Myotis mystacinus*, Common Pipistrelle *Pipistrellus pipistrellus*, Pipistrelle Bat species *Pipistrellus sp.*, Barbastelle *Barbastella barbastellus*, Noctule *Nyctalus noctula* and Unknown Bat species. The closest records were Common Pipistrelle and Noctule, located 0.1km east of the site boundary, associated with the Phase 1 development and recorded in 2018.

Survey Results and Evaluation

Preliminary Appraisal

- 5.3.3 As set out above, records of bats have been returned from within the surroundings of the site. The desk study does not indicate any ecological designations within 10km of the site which are identified for their bat interest.
- 5.3.4 The site is bound by extensive residential and commercial development which provides more limited foraging and commuting opportunities (albeit the railway line may represent

a commuting feature through Goring-on-sea). Habitats within the wider area of the site remain largely residential and commercial development.

- 5.3.5 A preliminary assessment of habitats in terms of their likely value for foraging and commuting bats is set out in Table 5.1 below.

Table 5.1. Assessment of value of habitats within the site for foraging and commuting bats

Commuting (potential flight-paths)	Foraging habitats
Network of tree lines and woodland forms continuous habitat that connects with offsite hedgerows that follow the adjacent railway track. The surrounding habitat is residential with limited connective vegetation to create a network – moderate potential suitability.	Provision of woodland and tree lines on site provide foraging opportunities – moderate potential suitability.

Roosting

Buildings

- 5.3.6 A detailed visual inspection was undertaken of all the buildings within the site, the results of which are and summarised below (with full details provided at Appendix 7111/3).
- 5.3.7 Two buildings are present within the site, B1 and B2, located within the former gas works area of the site. Both buildings are sub-stations however, building B1 is disused and of brick construction while building B2 in current use and of metal framework construction. These buildings and structures offer negligible roosting opportunities for bats and no evidence of roosting bats was recorded, e.g. droppings, staining, feeding remains, etc., were recorded during the inspection surveys.

Trees

- 5.3.8 Trees within the site were subject to an initial assessment for their suitability to support roosting bats. Where practical, these have been subject to a ground level tree assessment (GLTA). The results of this assessment are summarised in Table 5.2 below.

Table 5.2. Tree assessment results (see Plan 7111/ECO3 for tree/habitat references)

Tree / Habitat Ref.	Species	Assessment and potential roosting features	Summary
T1	Holm Oak (sm)	Rot hole on Northern elevation and lifted bark	PRF-M PRF-Is FAR
T2	Holm Oak (sm)	Fissure on southern side (10m high) and lifted bark	PRF-M PRF-Is FAR
T3	Holm Oak	Woodpecker hole in trunk (1.5m high)	PRF-I FAR
T4	Holm Oak	Lifted bark throughout the canopy	PRF-Is FAR
T5	Dead Tree	Standing dead tree	PRF-M PRF-Is FAR
T6	Holm Oak	Lateral limb split (section broken off), knot hole at ground level	PRF-M PRF-I FAR
T7	Holm Oak	Minor split and peeling bark on thin horizontal limb	PRF-I FAR

Tree / Habitat Ref.	Species	Assessment and potential roosting features	Summary
T8	Holm Oak	Limbs with peeling bark and tear out	PRF-M PRF-I FAR
T9	Holm Oak	Large tear out	PRF-M FAR
T10	Holm Oak	Knot hole on western side	PRF-M FAR
T11	Holm Oak	Cracked limb overhang site	PRF-I FAR

Recommendations

Scheme design

- 5.3.9 Where possible, trees with identified bat potential (see Table 5.2 above) should be retained. To minimise impacts on foraging and commuting bats, it is recommended that safeguarding measures, such as lighting, are implemented on-site as outlined below.

Roosting

- 5.3.10 Should any trees with bat potential be impacted under the proposals, it is recommended that further survey work is undertaken in the form of Potential Roost Feature (PRF) inspection. This would comprise close inspection of all identified PRFs using an endoscope and torch, with any evidence of roosting bats recorded and the relevant characteristics of the PRF described. This should include a total of a single visit immediately prior to felling during the spring or autumn to avoid the main bat breeding and hibernation periods, in accordance with best practice survey guidance.
- 5.3.11 Should any evidence of roosting bats be recorded within trees to be impacted by the proposals, further ecological survey work and a Natural England mitigation licence could be required prior to works commencing. This would likely require replacement roost provision e.g. through the installation of bat boxes.

Foraging and Commuting

- 5.3.12 The site is considered to be of moderate suitability for commuting and foraging bats due to the presence of woodland and tree lines within the site, albeit this is limited by the very urban setting of the site. Although no specific phase II bat surveys were undertaken, an adjacent development (Planning ref: AWD/1979/19) completed bat surveys in 2019 and recorded minimal activity from common and widespread species (Common Pipistrelle and Noctule), largely associated with the railway network. In terms of individual species, Common Pipistrelle and Noctule are considered to form ecologically important features at the local level.
- 5.3.13 Such the -rail network is outside of the line boundary, albeit directly adjacent to the northern site boundary therefore is to be fully retained and protected under the proposals. As such the proposals are unlikely to significantly impact the key commuting corridor for local bats. Additionally, the majority of boundary habitats are to be retained under the proposals with only a section of tree line and a section of woodland to be removed under the proposals. The removal of such features will not significantly impact commuting pathways across the local environment as the retained boundary habitats are more likely to be the key commuting pathways around site, connecting to the railway corridor.

- 5.3.14 Due to the urban nature of the surrounding habitats, it is unlikely that additional development under the proposals will significantly impact local bat species commuting and foraging within the local area. As such, where foraging habitat is removed under the proposed, additional tree or hedgerow planting is recommended to ensure local bat populations can continue to commute across the local area.

5.4 Badger

- 5.4.1 **Legislation.** Badger receives legislative protection under the Protection of Badgers Act 1992 (see Appendix 7111/2), and as such should be assessed as an important ecological feature. The legislation aims to protect this species from persecution, rather than being a response to an unfavourable conservation status, as the species is in fact common over most of Britain.
- 5.4.2 Licences can be obtained from Natural England for development activities that would otherwise be unlawful under the legislation. The types of activity that should be licensed are described in the relevant best practice guidance.^{21, 22}
- 5.4.3 **Background Records, Survey Results and Evaluation.** No records of Badger were returned by the Local Records Centre. No evidence of Badger was recorded during the habitat survey and this species is not considered to represent any constraint to development at present.

5.5 Other Mammals

- 5.5.1 **Legislation.** Several other mammal species including Water Vole *Arvicola amphibius* and Otter *Lutra lutra* receive full protection under the Wildlife and Countryside Act 1981 (as amended). Otter is also a European Protected Species under the Conservation of Habitats and Species Regulations 2017 (as amended), whilst both Water Vole and Otter are S41 Priority Species.
- 5.5.2 Other UK mammal species do not receive direct legislative protection relevant to development activities but may receive protection against acts of cruelty (for example, under the Wild Mammals (Protection) Act 1996). In addition, a number of these mammal species including Hedgehog *Erinaceus europaeus*, Brown Hare *Lepus europaeus* and Harvest Mouse *Micromys minutus* are S41 Priority Species and should be assessed as important ecological features.
- 5.5.3 **Background Records.** No specific records of other mammals from within or adjacent to the site were returned from the desktop study. Records of Hedgehog (Priority Species), Water Vole, Grey Seal, Rabbit, Harbour Seal and Bottle-Nosed Dolphin were returned by the desk study. The closest records were for Hedgehog, located 0.3km west of the site and recorded in 2005 and 2006. Such records were within a 1km x 1km OS grid square and more specific information was not available that would allow the precise location of these records to be determined.
- 5.5.4 **Survey Results and Evaluation.** A number of mammal holes likely attributed to Rabbit were recorded during the survey, associated with a sand spoil heap in the south western corner of grassland G3. Albeit, such species are not a material planning consideration and the loss of habitats used by these species to the proposals is of negligible significance.

²¹ English Nature (2002) *Badgers and Development*

²² Natural England (2011) *Badgers and Development: A Guide to Best Practice and Licensing*, Interim Guidance Document

5.5.5 No further evidence of any other protected, rare or notable mammal species was recorded from within the site. Other mammal species likely to use the site, such as Fox *Vulpes vulpes*, remain common in both a local and national context, and do not receive specific legislative protection in a development context. As per Rabbit, such species are not a material planning consideration and their use of the site is also of negligible significance.

5.5.6 **Recommendations.** Other mammal species pose limited constraints to the proposals.

5.6 Amphibians

5.6.1 **Legislation.** All British amphibians receive a degree of protection under the Wildlife and Countryside Act 1981 (as amended). Great Crested Newt is protected under the Act and is also listed as a European Protected Species under the Conservation of Habitats and Species Regulations 2017 (as amended). As such, both Great Crested Newt and habitats used by this species are afforded protection (see Appendix 7111/2). Great Crested Newt is also a S41 Priority Species, as are Common Toad *Bufo bufo*, Natterjack Toad *Epidalea calamita*, and Pool Frog *Pelophylax lessonae*. As such, these species should be assessed as important ecological features.

5.6.2 **Background Records.** No specific records of other mammals from within or adjacent to the site were returned from the desktop study. Records within 2km of the site were returned for Smooth Newt, Common Frog, Common Toad and Palmate Newt. The closest record was for Common Frog, located 1km south-east of the site boundary.

5.6.3 **Survey Results and Evaluation.** No pond features are present on site and no additional off-site ponds identified within 500m, following a review of OS maps. As such, amphibian species are unlikely to use the site and therefore Great Crested Newt of negligible significance to proposals.

5.6.4 **Recommendations.** There is no suitable breeding ponds or connectivity to suitable terrestrial habitat for amphibians such as Great Crested Newt as such limited constraints to the proposals. Therefore, no further survey work regarding amphibians is recommended.

5.7 Reptiles

5.7.1 **Legislation.** All six species of British reptile are listed under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), which protects individuals against intentional killing or injury. Sand Lizard *Lacerta agilis* and Smooth Snake *Coronella austriaca* receive additional protection under the Conservation of Habitats and Species Regulations 2017 (as amended), as set out at Appendix 7111/2. All six reptile species are also S41 Priority Species. As such, all reptile species should be assessed as important ecological features.

5.7.2 **Background Records.** A single record for Common Lizard was received from within the site itself and an additional two records for Slow-worm and Common Lizard were immediately adjacent to the site. Records were returned within the wider area for Slow-worm *Anguis fragilis*, and Common Lizard *Zootoca vivipara*.

5.7.3 **Survey Results and Evaluation.** Grassland fields within the site were predominantly of a short sward height during the survey work, with previous signs of mowing. Although grassland G2 supported a taller varied sward, these were also previously and of limited extent. Therefore, there are limited areas of suitable habitat and should management continue to cut the grassland there are limited opportunities for reptiles.

- 5.7.4 **Recommendations.** The site is considered to be relatively unconstrained in terms of reptiles, and further survey work is not considered necessary. However, very low numbers of reptiles may be present within the site using the grassland and woodland habitat, therefore that precautionary safeguards would be recommended prior to any site clearance works.

5.8 Birds

- 5.8.1 **Legislation.** All wild birds and their nests receive protection under Section 1 of the Wildlife and Countryside Act 1981 (as amended) in respect of killing and injury, and their nests, whilst being built or in use, cannot be taken, damaged or destroyed. Species included on Schedule 1 of the Act receive greater protection and special penalties apply to legal offences (see Appendix 7111/2).

- 5.8.2 **Conservation Status.** The conservation importance of British bird species is categorised based on a number of criteria including the level of threat to a species' population status²³. Species are listed as Green, Amber or Red. Red Listed species are considered to be of the highest conservation concern, being either globally threatened and/or experiencing a high level or rapid rate of population decline (>50% over the past 25 years). Numerous birds are also S41 Priority Species. Red and Amber listed species and Priority Species should be assessed as important ecological features.

- 5.8.3 **Background Records.** Information returned by the desk study included a high number of records for notable bird species in the local area. A high proportion of the species were Amber and Red Listed and include Avocet, Bittern, Black Redstart, Cuckoo, Dunnock, Fulmar, Grey Partridge, Hawfinch, Herring Gull, House Martin, House Sparrow, Kittiwake, Lapwing, Merlin, Nightingale, Oystercatcher, Pintail, Quail, Redstart, Skylark, Turtle Dove, Wheatear and Yellowhammer.

- 5.8.4 **Survey Results and Evaluation.** No evidence of use by birds was recorded during the survey however the habitats within the site provide valuable nesting and foraging habitat for birds in a largely urban environment, including the woodland areas, tree lines and tall forb. Subject to the implementation of nesting bird safeguards detailed in Chapter 6, the effects of the proposals will be minimised. Additionally, given that the surrounding residential development habitats are consistent with proposed habitats, it is likely that birds using the site are accustomed to urban environments therefore are unlikely to be negatively impacted by the development.

- 5.8.5 **Recommendations.** It is recommended that suitable bird nesting habitat are retained under the proposals where possible. The proposals present opportunities to provide enhancements for breeding birds, for example through new planting and installation of bird boxes.

5.9 Invertebrates

- 5.9.1 **Legislation.** Various invertebrate species are listed under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). In addition, Large Blue *Phengaris arion*, Fisher's Estuarine Moth *Gortyna borelii lunata* and Lesser Whirlpool Ram's-horn Snail *Anisus*

²³ Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D. and Win I. (2021). 'The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114, p.p. 723-747.

vorticulus receive protection under the Conservation of Habitats and Species Regulations 2017 (as amended), as set out at Appendix 7111/2. Some invertebrates are also S41 Priority Species. Where such species are present, they should be assessed as important ecological features.

5.9.2 Background Records. No records of invertebrates were returned from within or adjacent to the site. Records of notable invertebrates within the local area were primarily associated with residential hedgerows and local woodland habitats.

5.9.3 Survey Results and Evaluation. The site contains habitat of value to invertebrates including grassland bunds with exposed substrate however no species were recorded dominated by grassland (including banded areas) with limited structural and botanical diversity, and is therefore unlikely to be of significant importance to invertebrates. The network of woody vegetation around field boundaries is however likely to contribute to the local habitat network as a source of high deadwood resource or structural diversity.

5.9.4 Recommendations. The mixed coniferous woodland is being removed under the proposals which is likely to result in a loss of deadwood on-site. Therefore, it is recommended that habitat enhancement features such as log piles are included within the development to provide new deadwood habitats of value to invertebrates.

5.10 Summary

5.10.1 On the basis of the above, a summary of the evaluation of fauna is provided below:

Table 5.4. Evaluation summary of fauna forming important ecological features

Species / Group	Preliminary Evaluation	Further Survey Recommended?
Bats – Roosting	Potential habitat in the form of trees	Yes should scheme impacts trees with bat potential.
Bats – Foraging / Commuting (assemblage)	Suitable foraging and commuting habitat, albeit mainly at boundaries	Yes
Reptiles	Limited suitable habitat	No
Birds	Suitable foraging and nesting habitat	No
Invertebrates	Limited habitat	No

6 Mitigation, Compensation and Enhancement

6.1 Mitigation and Compensation

6.1.1 As set out in the previous chapters, the proposed development has followed the mitigation hierarchy approach as set out under the National Planning Policy Framework (NPPF), with consideration given first to avoidance, followed by mitigation and compensation.

6.1.2 Based on the assessment of the proposals and ecological designations, habitats and associated fauna identified within or adjacent to the site, it is proposed that the following mitigation and compensation measures (**MC1-MC10**) are implemented under the proposals. Further detailed mitigation strategies or method statements can be secured via suitably-worded planning conditions, as recommended by relevant best practice guidance (BS 42020:2019).

Ecological Designations

6.1.3 The site is not subject to any statutory or non-statutory ecological designations and it is unlikely that any such designations in the surrounding area will be significantly affected by the proposals. Accordingly, no specific mitigation or compensation measures are required.

Habitats

6.1.4 The proposed development would require the loss of on-site woodland and small sections of tree line. The remaining tree lines and boundary habitats are to be retained under the proposals. Compensation for tree line losses are set out below, together with standard safeguarding measures. Losses of non-important features will be addressed as part of the BNG strategy.

6.1.5 **MC1 – Tree Line Protection.** It is recommended that all tree lines to be retained within the proposed development be protected during construction in line with standard arboricultural best practice (BS5837:2012) or as otherwise directed by a suitably competent arboriculturalist. This may require the use of protective fencing or other methods appropriate to safeguard the root protection areas of retained trees.

Bats

6.1.6 Potential roosting habitat provided by trees is retained within the proposed along the eastern site boundary. Impacts on foraging and commuting bats will be minimised by implementation of a sensitive lighting design, as detailed further below.

6.1.7 **MC3 – Update Survey.** Should any considerable time (e.g. >2 years) [1 year may be more appropriate depending on situation] elapse between the survey work detailed above and any development works, a further survey of the buildings with potential to support roosting bats should be undertaken prior to the commencement of works to confirm the continued absence of bats.

6.1.8 **MC4 – Felling of Trees Supporting Bat Roosting Potential.** A number of trees supporting potential for roosting bats have been identified for removal under the current layout. These will be felled during the spring or autumn to avoid the main bat breeding and hibernation periods, and will be subject to inspection prior to felling in the form of climbing inspections, with use of an endoscope, to ensure that bats are absent and that no evidence of a roost (e.g. droppings) is present. Following detailed inspection, the tree will be felled, ideally the

same day as the inspection. If this is not possible, any potential roosting features will be inspected again immediately prior to felling.

- 6.1.9 Should features remain which cannot be fully investigated (e.g. deep cavities or numerous areas of lifted bark), the tree will be subject to an emergence / dawn re-entry survey immediately prior to felling to confirm absence of roosting bats.
- 6.1.10 Felling will then proceed under a precautionary approach. This will involve measures such as 'soft-felling' of sections of the tree identified as providing bat roosting opportunities (e.g. limbs with splits or holes), by lowering and cushioning these sections to reduce any potential effects caused by hard impact with the ground, followed by leaving the felled sections on the ground for a period of at least 24 hours to allow any bats, should these be present, to escape. This will be undertaken under the supervision of a suitably qualified ecologist.
- 6.1.11 If any evidence for the presence of roosting bats is recorded, works on that tree will be suspended and consideration will be given to the need to undertake works under a European Protected Species (EPS) development licence, and a licence application will be made to Natural England as required.
- 6.1.12 **MC5 – Sensitive Lighting.** Light-spill onto retained and newly created habitat, in particular the retained hedgerows, tree lines and scrub (especially along the south- western boundary), will be minimised in accordance with good practice guidance²⁴ to reduce potential impacts on light-sensitive bats (and other nocturnal fauna). This will be achieved through the implementation of a sensitively designed lighting strategy, with consideration given to the following key factors:
- **Light exclusion zones** – lighting should be controlled in areas likely to be used by bats. Light exclusion zones or 'dark buffers' may be used to provide interconnected areas free of artificial illumination to allow bats to move around the site;
 - **Appropriate luminaire specifications** – consideration should be given to the type of luminaires used, in particular luminaries should lack UV elements and metal halide and fluorescent sources should be avoided in preference for LED luminaries. A warm white spectrum (ideally <2,700K) should be adopted to reduce the blue light component;
 - **Light barriers / screening** – new planting (e.g. hedgerows and trees) or fences, walls and buildings can be strategically positioned to reduce light spill;
 - **Spacing and height of lighting units** – increasing spacing between lighting units will minimise the area illuminated and allow bats to fly in the dark refuges between lights. Reducing the height of lighting will also help decrease the volume of illuminated space and give bats a chance to fly over lighting units (providing the light does not spill above the vertical plane). Low level lighting options should be considered for any parking areas and pedestrian / cycle routes, e.g. bollard lighting, handrail lighting or LED footpath lighting;

²⁴ Bat Conservation Trust and Institute of Lighting Professionals (2023) Guidance Note 08/23: Bats and artificial lighting at night; Stone, E.L. (2013) Bats and lighting: Overview of current evidence and mitigation guidance; ILP (2011) Guidance notes for the reduction of obtrusive light. Institution of Lighting Professionals, GN01:2011.

- **Light intensity** – light intensity (i.e. lux levels) should be kept as low as possible to reduce the overall amount and spread of illumination;
- **Directionality** – to avoid light spill lighting should be directed only to where it is needed. Particular attention should be paid to avoid the upward spread of light so as to minimise trespass and sky glow;
- **Dimming and part-night lighting** – lighting control management systems can be used, which involves switching off/dimming lights for periods during the night, for example when human activity is generally low (e.g. 12.30 – 5.30am). The use of such control systems may be particularly beneficial during the active bat season (April to October). Motion sensors can also be used to limit the time lighting is operational.

Badger

6.1.13 No evidence of Badger has been recorded at the site. Nonetheless a precautionary approach will be adopted in relation to this species as detailed below.

6.1.14 **MC6 – Badger Update Survey.** Given that no evidence of Badgers has been recorded within or adjacent to the site it is considered that Badgers do not currently pose a constraint to development. Nonetheless, Badgers are dynamic animals and levels of Badger activity can rapidly change at a site, with new setts being created at any time. It is therefore recommended that an update survey is carried out prior to commencement of site works in order to confirm the current status of Badgers at the site.

Reptiles

6.1.15 As the potential habitat for reptiles within the site is limited, it is recommended to maintain the habitats on-site to ensure habitats do not increase in suitability, following methods detailed below.

6.1.16 **MC7 – Habitat Manipulation.** The habitat manipulation exercise will involve maintaining the grassland by cutting the vegetation within the affected areas of the development footprint to a short height (~15cm) so as to encourage reptiles to disperse to suitable areas of nearby habitat.

6.1.17 Following this, it is recommended that any potential refuge features on-site (particularly within the woodland), e.g. piles of rubble, heavy logs, brash piles, are fingertip-searched by an ecologist prior to being carefully disassembled. Any reptiles encountered during the destructive search would be carefully rescued by the supervising ecologist and relocated to suitable nearby habitat.

Nesting Birds

6.1.18 Removal of individual trees and sections of TL1 and woodlands W1a-b may result in effects on nesting birds. Accordingly, the following approach will be adopted.

6.1.19 **MC8 – Nesting Bird Restrictions.** To avoid a potential offence under the relevant legislation, no clearance of suitable vegetation should be undertaken during the bird-nesting season (1st March to 31st August inclusive). If this is not practicable, any potential nesting habitat to be removed should first be checked by a competent ecologist in order to determine the location of any active nests. Any active nests identified would then need to be cordoned off (minimum 5m buffer) and protected until the chicks have fledged. These checking surveys would need to be carried out no more than two days in advance of vegetation clearance.

Other Fauna

6.1.20 Survey work is ongoing in relation to Dormouse and reptiles, and any specific mitigation requirements in relation to these species will be set out in a separate addendum report.

6.1.21 The site has been identified as offering potential for other mammal species including Hedgehog and Brown Hare. Accordingly, the following approach will be adopted during site clearance and construction works.

6.1.22 **MC9 – Small Mammal Safeguards.** In order to safeguard Hedgehog, Brown Hare and other small mammals should they enter the site during construction works, the following measures will be implemented:

- A watching brief should be maintained for Hedgehog, Brown Hare and other small mammals throughout any clearance works;
- Any trenches left open overnight should be provided with a means of escape, e.g. gently graded ramp or a roughened plank, in order to allow animals to escape should they enter the trench. This is particularly important if the trench fills with water;
- Any temporarily exposed open pipes or open drains should be blanked off at the end of each working day so as to prevent animals gaining access as may happen when contractors are off-site;
- Any trenches/pits should be inspected each morning to ensure no animals have become trapped overnight;
- The storage of any chemicals at the site will be contained in such a way that they cannot be accessed or knocked over by any roaming animals;
- Fires will only be lit in secure compounds away from wooded habitats and will not be allowed to remain lit during the night;
- Unsecured food and litter will not be left within the working area overnight;
- Any piles of material already present on site, particularly vegetation/leaves, etc. and any areas of dense scrub or hedgerows, shall be dismantled/removed by hand and checked for Hedgehog prior to the use of any machinery/disposal;
- Any material to be disposed of by burning, particularly waste from vegetation clearance and tree works, should not be left piled on site for more than 24 hours in order to minimise the risk of Hedgehogs or other animals occupying the pile. If this cannot be avoided, material should be stored within a container such as a skip to prevent animals from gaining access. Any material which has been stored on the ground overnight should be moved prior to burning to allow a thorough check for any animals which may have been occupying the pile;
- In the event that an injured mammal is found, the animal should be wrapped carefully in a towel and taken to a local vet immediately. If an injured Hedgehog is found the British Hedgehog Preservation Society (BHPS) can be phoned (01584 890 801).

6.1.23 **MC10 – Faunal Habitat Connectivity.** To maintain connectivity throughout the site for Hedgehog and other small mammals and to allow access to suitable foraging habitat

contained within residential gardens, small holes (13cmx13cm) should be created within garden fences or under gates.

6.2 Ecological Enhancements

- 6.2.1 The National Planning Policy Framework (NPPF) encourages new developments to maximise the opportunities for biodiversity through incorporation of enhancement measures. The proposals present the opportunity to deliver ecological enhancements at the site for the benefit of local biodiversity, thereby making a positive contribution towards the broad objectives of national conservation priorities and the local BAP.

Habitats

- 6.2.2 Habitat enhancements will be delivered as part of the BNG strategy, forming a separate submission. This will be informed by the following principles, according with national and local conservation priorities.

- 6.2.3 **New Planting.** Where practicable, new planting within the site should be comprised of native species of local provenance, including trees and shrubs appropriate to the local area. Suitable species for inclusion within the planting could include native trees such as Oak, Birch *Betula pendula* and Field Maple, whilst native shrub species of particular benefit would likely include fruit and nut bearing species which would provide additional food for wildlife, such as Blackthorn, Hawthorn, Crab Apple *Malus sylvestris*, Hazel *Corylus avellana* and Elder. Where non-native species are proposed, these should include species of value to wildlife, such as varieties listed on the RHS' 'Plants for Pollinators' database, providing a nectar source for bees and other pollinating insects.

- 6.2.4 **Wetland Features.** The opportunity exists under the proposals to create new wetland habitats as part of the Sustainable Drainage System (SUDS). Where practical these should be designed in accordance with ecological principles, incorporating measures such as shallow, sinuous margins, areas of permanent water and planting with native vegetation. Such measures will benefit a range of wetland species including birds, aquatic invertebrates and amphibians whilst also helping to attenuate surface water run-off.

Fauna

- 6.2.5 To provide additional opportunities for fauna, it is proposed that a range of new features are incorporated within the proposed development. This should include the following features, with specific measures to be detailed as part of a faunal enhancement plan which can be secured via a suitably-worded planning condition.

- 6.2.6 **Bat Boxes.** Bat boxes should be incorporated within the proposed development. The provision of bat boxes will provide new roosting opportunities for bats in the area, such as Soprano Pipistrelle, a national Priority Species. So as to maximise their potential use, the bat boxes should ideally be situated on suitable retained trees, erected as high up as possible and sited in sheltered wind-free areas that are exposed to the sun for part of the day, facing a south-east, south or south-westerly direction. In addition, where architectural design allows, a number of integrated bat boxes / roost features should be incorporated into a proportion of the new build. The precise number and locations of boxes / roost features should be determined by a competent ecologist, post-planning once the relevant final development design details have been approved.

- 6.2.7 **Bird Boxes.** Bird nesting boxes should be incorporated within the proposed development, thereby increasing nesting opportunities for birds at the site. This should include integrated

nest boxes on new buildings targeting species including Swift and House Sparrow, whilst boxes can be erected on retained trees. The precise number and locations of boxes should be determined by a competent ecologist, post-planning once the relevant final development design details have been approved.

7 Biodiversity Net Gain Assessment (BNGA)

7.1 Defra Biodiversity Metric

- 7.1.1 To quantify the level of biodiversity net gain that can be delivered under the proposed development, the change in biodiversity value resulting from the scheme has been calculated using the Metric calculation tool, as informed by the associated User Guide²⁵. This takes account of the size, distinctiveness and ecological condition of existing and proposed habitat areas to provide a proxy measure of the present and forecast biodiversity value of a site, and therefore determine the overall change in biodiversity value.
- 7.1.2 Relevant outputs from the completed spreadsheet tool and associated target notes are provided at Appendix 7111/2.
- 7.1.3 The site was surveyed based on standard Phase 1 Habitat Survey methodology²⁶, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat, described above and illustrated in Plan 7111/BNG1. The site was classified into areas of similar botanical community types, with a representative species list compiled for each habitat identified. Habitats were classified in accordance with the UK Habitat Classification system, version 2.0²⁷, and condition assessed in accordance with the methodology set out in the Metric Technical Annex²⁸ and using professional judgement. In line with guidance²⁹, the fine scale minimum mapping unit (MMU) of 25sqm or 5m in length has been used where possible / relevant.
- 7.1.4 The post development information used to inform the Statutory Metric Calculation Tool are based on the latest proposed illustrative masterplan (see Plan 7111/BNG2). Given the outline nature of the proposals at this stage, the proposed strategy necessarily provides an indicative assessment of what could be achieved at the site based on the outline parameters, with any detailed information anticipated to be confirmed through reserved matters considerations at the appropriate stage.

7.2 Assumptions

- 7.2.1 When inputting the post-development habitat areas and condition to the Statutory Metric, the following assumptions have been made:
- The calculations within this report are based on the latest illustrative masterplan (as depicted within Plan 7111/BNG2). Therefore, should the proposed habitats change within future plans, this may need to be reflected in a revised net-gain calculation.

7.3 Degradation

- 7.3.1 During the survey work undertaken in October 2025, an area of hardstanding within the south-east of the site was present at the time of the survey in current use as a site compound for the adjacent development. However, from a review of aerial photography,

²⁵ Defra (Feb 2024) The Statutory Biodiversity Metric – User Guide

²⁶ Joint Nature Conservation Committee (2010, as amended) *'Handbook for Phase 1 habitat survey: A technique for environmental audit.'*

²⁷ UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)

²⁸ Statutory Biodiversity Metric - Technical Annex 1 - Condition Assessment Sheets and Methodology

²⁹ The UK Habitat classification User Manual. Version 1.1. 2020

an area of scrub was removed after 30 January 2020 to permit the creation of the site compound. The Town and Country Planning Act sets out that *"If (a) a person carries on activities on land on or after 30 January 2020 otherwise than in accordance with (i) planning permission, or (ii) any other permission of a kind specified by the Secretary of State by regulations, and (b) as a result of the activities the biodiversity value of the onsite habitat referred to in paragraph 5(1) is lower on the relevant date than it would otherwise have been, the pre-development biodiversity value of the onsite habitat is to be taken to be its biodiversity value immediately before the carrying on of the activities"*. Accordingly, the baseline habitat value includes Mixed Scrub of 'Good' condition in this area of the site, to account for the degradation of on-site habitats in line with standard guidance³⁰.

7.4 Irreplaceable Habitats

7.4.1 No irreplaceable habitats are present within the site.

7.5 Strategic Significance

7.5.1 Strategic significance in the metric is assigned to give extra value to habitats that are located in optimal locations or are of a type that meet local objectives for biodiversity. None of the habitats within the site are mapped within a published LNRS or any specified alternative documents. Therefore, in accordance with the User Guide, low strategic significance has been applied to the pre-development habitats.

7.6 Habitat Type and Condition

7.6.1 Summaries of the pre- and post-development habitats and hedgerows are set out at Tables 7.1 to 7.4, below. On-site pre-development habitats are identified at Plan 7111/BNG1 and on-site post-development habitats are shown at Plan 7111/BNG2.

³⁰ CIEEM (April 2019) On the lifespan of ecological reports and surveys

Table 7.1. Pre-development Area Habitats

Habitat	Condition	Condition Rationale
Sparsely vegetated land – Tall Forbs	Good	An area of Tall Forb is present on-site and passes 3 of the four condition assessment criteria and therefore is assessed as being of 'Moderate' condition (see Condition Assessment Sheet at Appendix 7111/1 for details).
Grassland – Modified Grassland	Poor	One area of modified grassland (G2) is present within the site supported a low species richness in the context of modified grassland, 4.2 species per square metre. As such, the modified grassland field G2 pass five of the condition assessment criteria, however fails the essential Criterion A, and therefore are assessed as being of 'Poor' condition (see Condition Assessment Sheet at Appendix 7111/1 for details).
Grassland – Other Neutral Grassland	Moderate	Two areas of other neutral grassland are present on-site, supporting a moderate species richness in the context of modified grassland, between 8 and 9 species per square metre. As such, the areas of other neutral grassland pass three of the condition assessment criteria, including the essential Criterion A, and therefore are assessed as being of 'Moderate' condition (see Condition Assessment Sheet at Appendix 7111/1 for details).
Grassland – Other Neutral Grassland	Poor	One modified grassland field (G2) is present within the site supported a low species richness in the context of modified grassland, 4.2 species per square metre. As such, the modified grassland field G2 pass five of the condition assessment criteria, however fails the essential Criterion A, and therefore are assessed as being of 'Poor' condition (see Condition Assessment Sheet at Appendix 7111/1 for details).
Heathland and Shrub – Bramble Scrub	N/A	A condition assessment is not applicable for this habitat type.
Heathland and Shrub – Mixed Scrub	Good	One area of Mixed Scrub was estimated to be present prior to removal works commencing, associated with Phase 1 of the development. Such Mixed Scrub was assessed as being of 'Good' condition (see Condition Assessment Sheet at Appendix 7111/1 for details).
Woodland and Forest – Other coniferous woodland	Poor	An area of other coniferous woodland is present on-site and achieves a condition assessment score of 25 and therefore is assessed as being of 'Poor' condition (see Condition Assessment Sheet at Appendix 7111/1 for details).
Woodland and Forest – Other woodland; mixed	Poor	An area of other woodland mixed is present on-site and achieves a condition assessment score of 25 and therefore is assessed as being of 'Poor' condition (see Condition Assessment Sheet at Appendix 7111/1 for details).
Urban – Developed land, sealed surface	N/A	A condition assessment is not applicable for this habitat type.
Urban – Bare Ground	Poor	See relevant condition assessment sheet.

Table 7.2. Post-development Area Habitats

Habitat	Condition	Condition Rationale
Grassland – Other Neutral Grassland	Moderate	An area of wetland other neutral grassland is to be created around the sustainable drainage feature within the open space to the east of the development. Through planting of an appropriate species-rich mix, management to prevent encroachment of scrub and bracken this habitat is anticipated to achieve a moderate condition within 5 years.
Grassland – Other Neutral Grassland	Moderate	Areas of other neutral grassland are to be created across the development, around the buildings and in the areas of public open space. Through planting of an appropriate species-rich mix, management to prevent encroachment of scrub and bracken this habitat is anticipated to achieve a poor condition within 2 years.
Grassland – Modified Grassland	Moderate	Areas of amenity grassland to be created near to the built development. Through planting of an appropriate species-rich mix, management to prevent encroachment of scrub and bracken as well as an absence of non-native species this habitat is anticipated to achieve at least a moderate condition within 4 years.
Heathland and Shrub – Mixed Scrub	Moderate	The area of mixed scrub will be planted with native species and subject to an appropriate management plan to ensure a moderate condition will be achieved. Moderate condition is expected to be achieved within 5 years.
Wetland - Reedbeds	Moderate	Areas of Reedbed are to be created at the margins of the Sustainable Drainage Systems. Moderate condition is expected to be achieved within 7 years.
Urban – Sustainable Drainage System	Moderate	The Sustainable Drainage Systems includes all the permanently wet features that will be created. A variety of native species that are valuable to wildlife will be planted. Moderate condition is expected to be achieved within 3 years.
Urban – Introduced Shrub	Condition Assessment N/A	Ornamental planting will be created throughout the site associated with proposed residential buildings. This includes a mixture of non-native ornamentals and native species, managed closely for amenity value. No assessment for the condition of this habitat is required.
Urban – Vegetated Garden	Condition Assessment N/A	Vegetated garden areas associated with both enclosures. No assessment for the condition of this habitat is required.
Urban – Developed land, sealed surface	Condition Assessment N/A	This includes all buildings within the site. No assessment for the condition of this habitat is required.

Urban – Artificial unvegetated, unsealed surface	Condition Assessment N/A	This includes the proposed LEAP playground area. No assessment for the condition of this habitat is required.
Urban – Developed land, sealed surface	Condition Assessment N/A	This includes all roads and paths within the site. No assessment for the condition of this habitat is required.
Individual Trees – Urban Tree	Poor	It is proposed to plant 96 small trees within the public grassland areas and along roads. These will vary in planting size and species; however, they are all expected to achieve 'small' size category within the designated 30 years.

Table 7.3. Pre-development linear feature

Habitat	Condition	Condition Rationale
Line of Trees (TL1 and TL2)	Moderate	Two non-native tree lines on the boundary of SGN former gas works land and the NIB land. tree lines pass three of the condition assessment criteria and therefore is assessed as being of 'Moderate' condition (see Condition Assessment Sheet at Appendix 7111/1 for details).

Table 7.4. Post-development linear feature creation

Habitat	Condition	Condition Rationale
Native Hedgerow	Moderate	Native hedgerows will be created along grassland boundaries. Through planting of an appropriate species-rich shrubs and management, the hedgerow is expected to achieve moderate condition in 5 years.
Non-native and Ornamental Hedgerow	Poor	Non-native ornamental hedgerow located to the east of the site. Automatically given 'poor' condition.

7.7 Biodiversity Net Gain Assessment

Habitat Biodiversity Impact Calculations

- 7.7.1 As set out above, the internal areas of the site are currently dominated by developed land, introduced shrub and vegetated garden, along with 11 urban trees.
- 7.7.2 The proposals are for mixed-use development comprising 123 dwellings and commercial units with associated parking, landscaping, open space and drainage.
- 7.7.3 On the basis of the considerations and proposals set out (including the assumptions and limitations set out and within the comments in the spreadsheet tool), the Statutory Metric calculator indicates a net habitat biodiversity unit change of -14.03 Habitat Units representing a gain of -63.20% based on the illustrative masterplan.

Hedgerow Impact Assessment

- 7.7.4 The proposals include the loss of a section of tree line TL1, with the proposed redevelopment including replacement hedgerow planting within the red line boundary.

- 7.7.5 Accordingly, on the basis of the proposals, the Statutory Metric calculator indicates a net hedgerow biodiversity unit change of 0.69 Hedgerow Units representing a gain of 43.87% within the site boundary.

Overall Anticipated Change in Biodiversity

- 7.7.6 The anticipated change in biodiversity value as a result of the proposals has been calculated using the Statutory Biodiversity Metric, based on the assumptions and considerations set out above. A copy of the completed Statutory Biodiversity Metric tool is provided separately (ref: 7111 BNG Stat dv3, dated 30/04/2026) and relevant extracts from the completed calculator tool are provided at Appendix 7111/BNG2.

- 7.7.7 When considering the current proposals, the Metric calculates that the development will likely result in the following changes in biodiversity, summarised in Table 7.5 (below):

Table 7.5. Anticipated change in biodiversity

<i>Unit type</i>	<i>Existing baseline 'value'</i>	<i>Calculated 'value' under the proposals</i>	<i>Total net change in Habitat Units change</i>	<i>Total net % change</i>
Onsite Habitat units	22.20	8.17	-14.03 units	-63.20%
Onsite Hedgerow units	1.58	2.27	+0.69	+43.87%
River units	N/A – No Rivers or Streams present/affected			

- 7.7.8 As can be seen from the above, under the proposed development a 10% net gain in biodiversity will not be delivered within the site itself. To achieve a 10% net gain in habitat units and satisfy trading rules, a total of 16.25 off-site units are required, of which 3.45, 8.73 and 0.36 units must comprise other neutral grassland, mixed scrub, and other woodland mixed respectively or a higher distinctiveness habitat type to satisfy trading rules.

- 7.7.9 Under the relevant legislation, consideration of how the 10% gain will be delivered offsite is determined post-planning submission, via a Biodiversity Gain Plan. However, the offsite BNG units could be delivered through a national BNG broker, subject to an application of the relevant spatial risk multiplier, where relevant. Finally, as a last resort, the offsite BNG units can be delivered by purchasing the government's statutory biodiversity credits. The exact approach to be pursued can be confirmed by way of a Biodiversity Gain Plan following grant of planning permission.

7.8 Conclusions

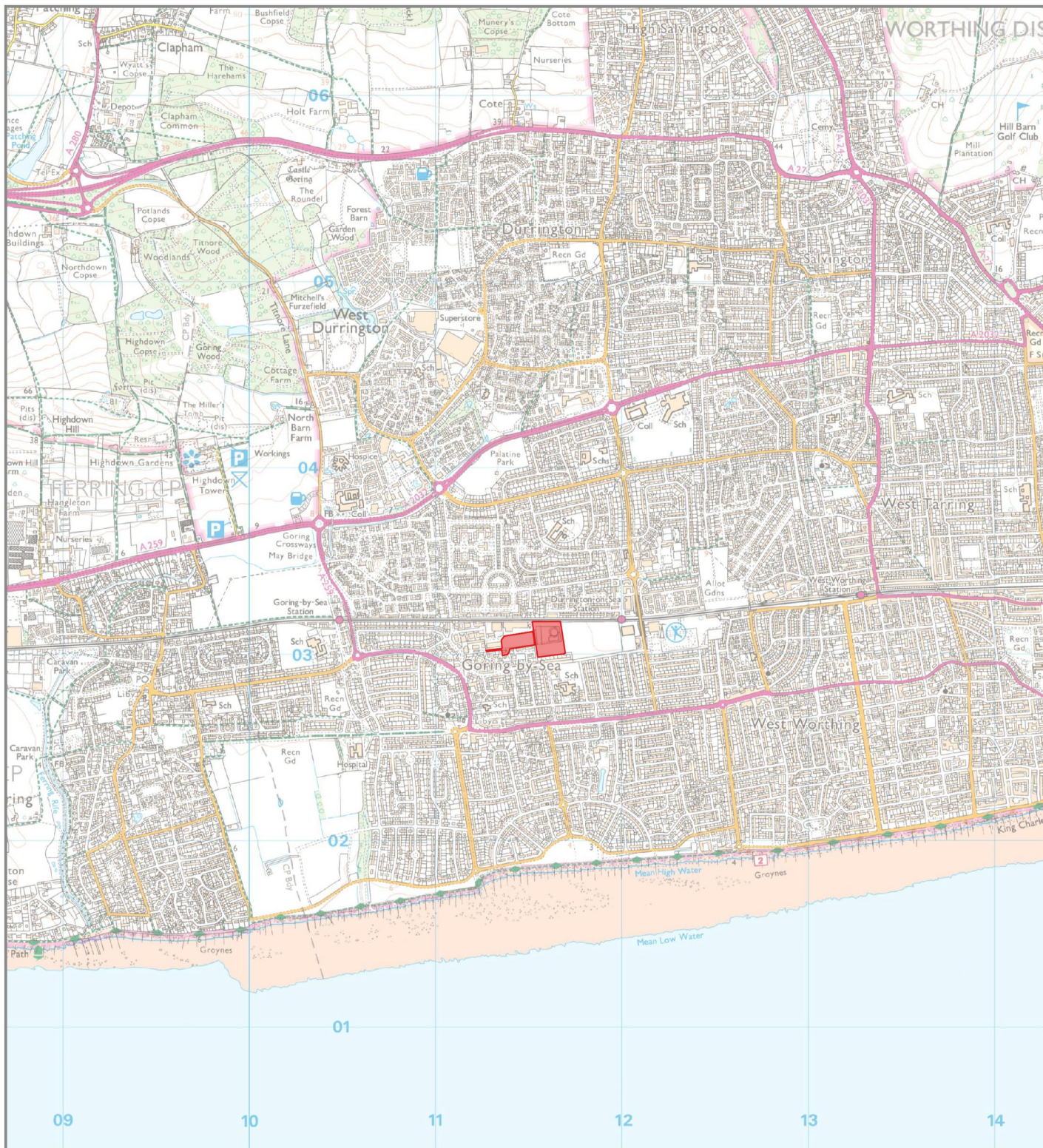
- 7.8.1 In conclusion, the proposals have sought to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is considered unlikely that the proposals will result in significant harm to biodiversity, albeit in order to satisfy the Metric requirements the use of offsetting will be required to deliver a 10% gain.

8 Conclusions

- 8.1 Aspect Ecology has carried out a Preliminary Ecological Appraisal of proposed development at land at Barrington Road, Goring-by-sea, Worthing, based on the results of a desktop study, Phase 1 habitat survey and general faunal assessment.
- 8.2 The site is not subject to any statutory or non-statutory ecological designations.
- 8.3 The habitat survey has established that the site is dominated by habitats not considered to be of ecological importance, whilst the proposals have sought to retain those features identified to be of value. Where it has not been practicable to avoid loss of habitats, new habitat creation including additional tree planting is proposed to offset any loss of habitat to the proposals.
- 8.4 The habitats within the site support several protected species, including species protected under both national and European legislation. Accordingly, a number of mitigation measures have been proposed to minimise the risk of harm to protected species, with compensatory measures proposed, where appropriate, in order to maintain the conservation status of local populations.
- 8.5 The habitats within the site support several protected species, including species protected under both national and European legislation. Accordingly, a number of mitigation measures have been proposed to minimise the risk of harm to protected species, with compensatory measures proposed, where appropriate, in order to maintain the conservation status of local populations.

Plan 7111/ECO1:

Site Location



Key:

 Site Location

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Barrington Road,
Durrington on Sea
Site Location

7111/ECO1

A/JP

October 2025

AN/JP

PROJECT

TITLE

DRAWING NO.

REV

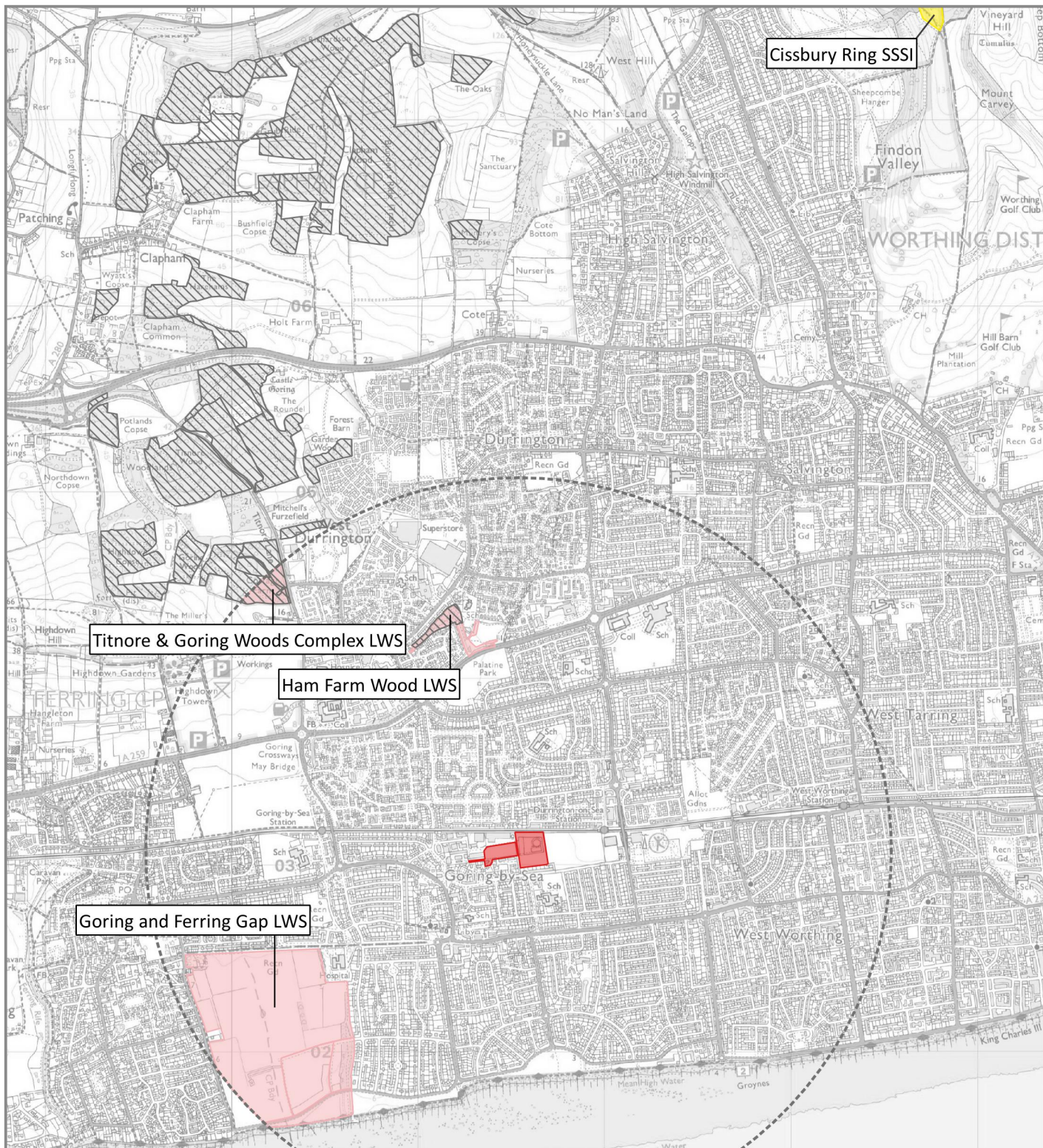
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Plan 7111/ECO2:

Ecological Designations



Key:

- Site Location
- Site of Special Scientific Interest (SSSI)
- Local Wildlife Site (LWS)
- Ancient Semi Natural Woodland (ASNW)
- Local Records Centre 2km Search Area

Only non-statutory sites located within the 2km local record centre search area are shown on the above plan.
Non-statutory data provided by Sussex Biodiversity Records Centre

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**Barrington Road,
Durrington on Sea
Ecological Designations**

7111/ECO2

A/JP

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DATE

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Plan 7111/ECO3:

Habitats and Ecological Features
