



Columbia Threadneedle Investment Limited

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# **Lyons Farm Retail Park**

## **Biodiversity Net Gain Report**





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# Contents

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|            |                                                                                |           |
|------------|--------------------------------------------------------------------------------|-----------|
| <b>1</b>   | <b>Introduction</b>                                                            | <b>1</b>  |
| <b>1.1</b> | <b>Document Purpose</b>                                                        | <b>1</b>  |
| <b>1.2</b> | <b>Proposed Development Background</b>                                         | <b>1</b>  |
| <b>1.3</b> | <b>Biodiversity Net Gain Overview</b>                                          | <b>1</b>  |
| <b>1.4</b> | <b>Scope of Report</b>                                                         | <b>2</b>  |
| <b>2</b>   | <b>Methods</b>                                                                 | <b>4</b>  |
| <b>2.1</b> | <b>Quality Assurance</b>                                                       | <b>4</b>  |
| <b>2.2</b> | <b>Guidance and Tools</b>                                                      | <b>4</b>  |
| <b>2.3</b> | <b>Data Sources</b>                                                            | <b>4</b>  |
| <b>2.4</b> | <b>UK Habitat Classification Survey</b>                                        | <b>5</b>  |
| <b>2.5</b> | <b>Relevant Date for Pre-development Biodiversity Value (On-site Baseline)</b> | <b>5</b>  |
| <b>2.6</b> | <b>Strategic Significance</b>                                                  | <b>5</b>  |
| <b>3</b>   | <b>Results</b>                                                                 | <b>7</b>  |
| <b>3.2</b> | <b>UK Habitat Classification Survey</b>                                        | <b>7</b>  |
| <b>3.3</b> | <b>On-site Baseline Biodiversity</b>                                           | <b>7</b>  |
| <b>3.4</b> | <b>On-site Post-intervention Biodiversity</b>                                  | <b>8</b>  |
| <b>3.5</b> | <b>Off-site Biodiversity Modelling</b>                                         | <b>9</b>  |
| <b>4</b>   | <b>Recommendations and Next Steps</b>                                          | <b>10</b> |
| <b>5</b>   | <b>References</b>                                                              | <b>11</b> |

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## ***Tables***

|                                               |   |
|-----------------------------------------------|---|
| Table 2-1 – Strategic Significance Assignment | 6 |
|-----------------------------------------------|---|

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## ***Figures***

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## ***Appendices***

Appendix A

Baseline and Post-intervention Habitat Maps

Appendix B

BNG Legislation & Policy

Appendix C

Statutory Biodiversity Metric & Supplementary Files

Appendix D

Habitat & Hedgerow Condition Assessment Summary

Appendix E

Post-Development Habitat Translation

Appendix F

BNG Good Practice Principles for Development (CIEEM, IEMA & CIRIA, 2016)

# 1 Introduction

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## 1.1 Document Purpose

- 1.1.1. WSP UK Ltd. (WSP) was commissioned by Columbia Threadneedle Investment Limited (herein referred to as “Columbia Threadneedle”) to undertake a Biodiversity Net Gain (BNG) assessment of Lyons Farm Retail Park, (herein referred to as “the Proposed Development”).
- 1.1.2. Columbia Threadneedle understands that, should planning permission be granted for the Proposed Development, it would be subject to the BNG condition under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a). It is understood that the time of the BNG assessment, the Proposed Development does not meet criteria for BNG exemption, as defined by the Biodiversity Gain Requirements (Exemptions) Regulations 2024 (HM Government, 2024b).
- 1.1.3. The purpose of this document is to report the process and outcomes of a BNG assessment completed to support and inform a planning application under the Town and Country Planning Act 1990.

## 1.2 Proposed Development Background

- 1.2.1. The Site is located within the established retail park at Lyon Farm, in Worthing, East Sussex. The Proposed Development comprises the expansion of the existing Site for the creation of a further retail warehouse on under-utilised land on the edge of the existing retail park. The additional retail warehouse would be located to the south of the existing Wren Kitchens unit on a grass bank adjacent to the A27.
- 1.2.2. The Site area is 0.09 hectares (ha) based on its design at the time of this assessment and is defined by the Proposed Development’s red line boundary shown in **Appendix A: Figure 1**. This is hereafter referred to as “the Site”.

## 1.3 Biodiversity Net Gain Overview

- 1.3.1. BNG is defined by the Department for Environment, Food, & Rural Affairs (Defra) as an approach to development that makes sure that habitats for wildlife are left in a measurably better state than they were before the development (Defra, 2024a).
- 1.3.2. In England, a minimum 10% BNG (in terms of biodiversity unit uplift relative to the baseline) is mandatory for major developments and small sites under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a).
- 1.3.3. Under the Worthing Local Plan, the Site is considered to be previously developed land, and therefore, in accordance with policy DM18, a 20% net gain in biodiversity units is “required on previously developed sites” (see excerpt from the Worthing Local Plan below). This was

highlighted as a requirement for the Proposed Development within the pre-application response from Adur and Worthing Council.

*“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**”* (Worthing Borough Council, 2023).

- 1.3.4. The BNG process follows the ecological mitigation hierarchy, which sets out that everything possible must be done to firstly avoid, secondly minimise and thirdly restore/rehabilitate losses of biodiversity on-site. Only as a last resort, residual losses are compensated for using off-site habitat enhancement or creation (also known as ‘off-site gains’).
- 1.3.5. Mandatory BNG also requires the application of the Biodiversity Gain Hierarchy (Defra, 2024b), which specifies that:
  - *“first, in relation to on-site habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and*
  - *then, in relation to all on-site habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits.”*
- 1.3.6. Mandatory BNG must be assessed by a competent person using the Statutory Biodiversity Metric (herein referred to as “the Metric”) and its associated rules and guidance (Defra, 2024c). The Metric accounts for habitat losses and gains resulting from development and quantifies the net change in biodiversity value, measured in ‘area habitat units’, ‘hedgerow units’ and ‘watercourse units’<sup>1</sup>. The Metric guidance also states that up-to-date industry good practice principles (CIEEM, CIRIA & IEMA, 2016) and British Standard (BS) 8683:2021 (British Standards Institute, 2021) should be considered.

## 1.4 Scope of Report

- 1.4.1. Columbia Threadneedle are required to deliver a minimum 20% BNG target for the Proposed Development, in line with the Environment Act 2021 and policy DM18 within the Worthing local plan.
- 1.4.2. The remainder of this report and associated appendices describe the BNG assessment methods, results and recommendations for the following aspects of the Proposed Development, aligning with the Biodiversity Gain Hierarchy (Defra, 2024b):

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<sup>1</sup> The minimum 10% BNG target applies separately for each type of unit, and these cannot be summed or traded.

1. The pre-development (baseline) biodiversity unit value of on-site area habitats calculated using the Metric.
  2. The estimated units to be retained, lost, enhanced, and created on-site, based on the Proposed Development's design.
  3. The resulting overall net change in **on-site** biodiversity unit value (i.e., whether the Proposed Development achieves an on-site net loss, no net loss, or net gain in biodiversity units).
  4. An estimate of the number and type of **off-site** units needed to reach 20% BNG based on modelling.
  5. The overall result for the Proposed Development (including on-site and off-site measures), indicating whether the minimum 20% BNG target is estimated to be achieved.
- 1.4.3. It is important to recognise that BNG is one of several factors to be considered when assessing the impact of the Proposed Development on biodiversity. Please note that this BNG report does not cover potential impacts of the Proposed Development on protected species or, designated sites.
- 1.4.4. This assessment has been compiled with reference to relevant legislation and policy relating to nature conservation and BNG, listed in **Appendix B**.

## 2 Methods

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### 2.1 Quality Assurance

- 2.1.1. This report and the Metric calculation have been completed and quality assured by a team of ecologists competent in BNG, including one qualifying member and two Full members of the Chartered Institute of Ecology and Environmental Management (CIEEM).
- 2.1.2. Baseline habitat surveys were completed by a competent WSP ecologist, and member of CIEEM, with extensive experience of completing UK Habitat Classification Surveys (UKHab, 2023).

### 2.2 Guidance and Tools

- 2.2.1. This BNG report and approach has applied the following guidance and tools:
  - UK Government Biodiversity Net Gain Collection (Defra, 2024g);
  - Statutory Biodiversity Metric and associated user guidance (Defra, 2024c), including the associated rules and principles set out in the Metric User Guide;
  - Biodiversity Net Gain: Good Practice Principles for Development (CIEEM, CIRIA & IEMA, 2016) see **Appendix F**.
  - Biodiversity Net Gain: Good Practice Principles for Development – a Practical Guide (CIEEM, CIRIA & IEMA, 2019);
  - British Standard 8683 Process for designing and implementing Biodiversity Net Gain – Specification (2021) (British Standards Institute, 2021); and
  - Biodiversity Net Gain Reporting and Audit Templates (CIEEM, 2021).

### 2.3 Data Sources

- 2.3.1. The following data sources have been used to complete the Metric calculation:
  1. A UK Habitat Classification (UKHab) (UKHab, 2023) and Metric habitat type survey undertaken in July 2025 following best practice guidelines. This survey provided baseline habitat data which detailed the habitat types present on-site, their area (ha) and/or length (km) and their geographic distribution. Full details of the survey method are provided within the **section 2.4** of this BNG report. All areas/lengths of habitats have been measured using QGIS 3.28.4 with reference to Ordnance Survey MasterMap (OSMM)). Habitat survey data has been provided within **Appendix A** and **Appendix C**.
  2. Condition assessments for area habitats, were completed concurrently with the baseline habitat survey, following the Metric Condition Assessments Criteria (Defra, 2024c). A summary of condition assessment results is provided in **Appendix D**. Detailed condition

assessments per individual habitat parcel are provided within the supplementary dataset (see **Appendix C**).

3. A landscape plan was used to identify post-intervention habitats [16755-1-SFW-XX-XX-DR-L-1001 – Landscape Plan (003)] provided by Smeeden Foreman in May 2025, indicating areas of habitat to be created, and retained on-site. This plan was translated into post-development Metric habitat types for use in the assessment (see **Appendix E** for habitat translation. Post-development habitats are visualised in **Appendix A, Figure 2**).

## 2.4 UK Habitat Classification Survey

- 2.4.1. A UKHab survey was carried out on the 14 July 2025. The survey involved a walkover of the land within the RLB (**Figure 1**) including boundary features (where accessible) using the UKHab Habitat Classification to map and classify habitats.
- 2.4.2. The UKHab system classifies habitats according to their vegetation types and structure. Primary Habitat were assigned to each polygon and line feature within the RLB. Whilst the UKHab survey was undertaken, a Habitat Condition Assessment (HCA) was also undertaken to collect the data required to support the BNG Assessment. The habitat condition assessment used the metric condition criteria, undertaken by a WSP ecologist.

## 2.5 Relevant Date for Pre-development Biodiversity Value (On-site Baseline)

- 2.5.1. The metric calculation has been carried out based on on-site baseline habitats present on the 'relevant date'<sup>2</sup>. This was determined based on the date of the planning application, and whether authorised habitat degradation had been carried out since 25 August 2023 or unauthorised habitat degradation had been carried out since 30 January 2020.
- 2.5.2. No signs of habitat degradation were recorded therefore the relevant date is taken to be the date of the planning application. It is considered that the baseline survey data collected on 14 July 2025 reflects the habitats present on this date.

## 2.6 Strategic Significance

- 2.6.1. Strategic significance of habitats<sup>3</sup> has been assessed following the categories set out in Table 8 of the Metric User Guide (Defra, 2024c) using the following documents as specified by the Local Planning Authority (LPA), due to the absence of a Local Nature Recovery Strategy (LNRS):
  - Areas of protected sites and irreplaceable habitats map (Sussex Nature Recovery, 2024);

<sup>2</sup> As defined in paragraph 5 of Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990 (HM Government, 1990).

<sup>3</sup> Defined as the local significance of the habitat based on its location and the habitat type – see page 27 of the Statutory Biodiversity Metric User Guide (Defra, 2024c)

- Sussex LNRS draft habitat measures (Sussex Nature Recovery, 2025); and
- Shortlisted habitat priorities and outcomes (Sussex Nature Recovery, 2024).

2.6.2. Habitats have been assigned a strategic significance score based on their location and habitat type. This has been applied both for on-site baseline and post-intervention habitats, as summarised in **Table 2-1**.

**Table 2-1 – Strategic Significance Assignment**

| Strategic Significance                          | Habitats Assigned and Reasoning                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| High<br>(Formally identified in local strategy) | <p>Post-intervention habitat creation of ground level planters on-site has been assigned a high strategic significance. This is based on the habitat priorities identified by Sussex Nature Recovery. One of the 23 priorities is to create and connect new nature-rich areas in urban settings for both wildlife and people.</p> <p>Relevant measures identified by Sussex Nature Recovery include innovatively used land in densely populated urban areas for smaller scale interventions, such as using planters. The post-intervention habitat creation of ground level planters identified for the Site, aligns with these proposed measures.</p> |
| Low<br>(Area not in a local strategy)           | <p>Baseline habitats have been assigned low strategic significance. The Site is not described as locally ecologically important, as it is not within the areas of protected sites or irreplaceable habitats map<sup>Error! Bookmark not defined.</sup>. Areas that could become of importance for nature have not been identified by Sussex Nature Recovery yet.</p> <p>Post-intervention retained habitats, and developed land are recorded as low as actions do not align with priority measures outlined in the shortlisted habitat priorities and outcomes, or LNRS draft measures published by Sussex Nature Recovery.</p>                        |

## 3 Results

- 3.1.1. This section provides a summary of results for the Proposed Development, including the on-site baseline and post-intervention biodiversity. Further detailed quantitative results are provided within the Metric toolkit(s) (see **Appendix C**).

### 3.2 UK Habitat Classification Survey

- 3.2.1. The land within the RLB comprised two habitats; an area of grass to the south of the existing retail unit; and hardstanding. The grass was observed to be regularly mown to a short sward height. The UKHab classification of this habitat was g4 modified grassland, secondary code 109 mown and collected, 108 frequently mown. The species identified are listed in Table 3-1.

**Table 3-1 – Grassland species identified during the UKHab survey**

| Common name         | Latin name                     | Abundance (DAFOR Scale) |
|---------------------|--------------------------------|-------------------------|
| Common mallow       | <i>Malva sylvestris</i>        | Common                  |
| Birds-foot trefoil  | <i>Lotus corniculatus</i>      | Occasional              |
| Common plantain     | <i>Plantago major</i>          | Occasional              |
| Bristly oxtongue    | <i>Helminthotheca echiodes</i> | Rare                    |
| Thistle sp.,        | <i>Cirsium sp.</i>             | Rare                    |
| Yarrow              | <i>Achillea millefolium</i>    | Occasional              |
| Perennial rye-grass | <i>Lolium perenne</i>          | Dominant                |
| Cock's-foot         | <i>Dactylus glomerata</i>      | Occasional              |

- 3.2.2.

### 3.3 On-site Baseline Biodiversity

- 3.3.1. The BNG assessment identified two area habitat types within the Site as shown in the baseline habitat map, provided in **Appendix A**. The Site was made up of modified grassland in poor condition and developed land, sealed surface
- 3.3.2. A summary of baseline habitat units is provided in
- 3.3.3. **Figure 3-1.** No linear habitats or watercourses were identified within the RLB.

### 3.4 On-site Post-intervention Biodiversity

- 3.4.1. An overview of on-site post-intervention biodiversity units for the Proposed Development is provided below in **Figure 3-1**. The Proposed Development is expected to result in a near total loss of existing modified grassland, and the creation of urban-ground level planter habitat. A post-intervention habitat map is provided in **Appendix A**.

#### On-site Habitat Retention

- 3.4.2. Habitats have been retained wherever feasible, in line with the mitigation hierarchy and Biodiversity Gain Hierarchy.

#### On-site Habitat Enhancement

- 3.4.3. No habitat enhancement has been proposed for the Site. On-site habitat enhancement has been deemed unfeasible due to the surrounding land use, and very small size of the Site that leaves very limited area for habitat enhancement.

#### On-site Habitat Loss

- 3.4.4. Modified grassland will be lost because of the Proposed Development. This habitat loss is necessary to accommodate the construction of the new retail unit.

#### On-site Habitat Creation

- 3.4.5. Within the landscape plan for the Site, ground level planters are being installed to the south of the new retail unit. The planters are to be planted with four climbing species: *Hydrangea anomala petiolaris*, *Clematis armandii*, *Lonicera periclymenum*, and *Hedera colchica* 'Dentata variegata'. This accounts for 0.02ha of habitat creation within the post-intervention.

#### Summary of On-site Biodiversity Change

- 3.4.6. Headline results for the on-site baseline units, on-site post-intervention units, and on-site net change are shown in
- 3.4.7. **Figure 3-1**. Detailed results per individual habitat type, including habitat trading, can be viewed within the Metric toolkit (see **Appendix C**).

**Figure 3-1 - On-site Headline Results**

|                                                                                    |                    |       |
|------------------------------------------------------------------------------------|--------------------|-------|
| On-site baseline                                                                   | Area habitat units | 0.14  |
|                                                                                    | Hedgerow units     | 0.00  |
|                                                                                    | Watercourse units  | 0.00  |
| On-site post-intervention<br>(Including habitat retention, creation & enhancement) | Area habitat units | 0.05  |
|                                                                                    | Hedgerow units     | 0.00  |
|                                                                                    | Watercourse units  | 0.00  |
| On-site net change<br>(units & percentage)                                         | Area habitat units | -0.09 |
|                                                                                    | Hedgerow units     | 0.00  |
|                                                                                    | Watercourse units  | 0.00  |

| FINAL RESULTS                                                                                         |        |                    |                                |              |
|-------------------------------------------------------------------------------------------------------|--------|--------------------|--------------------------------|--------------|
| Total net unit change<br>(Including all on-site & off-site habitat retention, creation & enhancement) |        | Area habitat units | -0.09                          |              |
|                                                                                                       |        | Hedgerow units     | 0.00                           |              |
|                                                                                                       |        | Watercourse units  | 0.00                           |              |
| Total net % change<br>(Including all on-site & off-site habitat retention, creation & enhancement)    |        | Area habitat units | -65.44%                        |              |
|                                                                                                       |        | Hedgerow units     | 0.00%                          |              |
|                                                                                                       |        | Watercourse units  | 0.00%                          |              |
| Trading rules satisfied?                                                                              |        |                    | No - Check Trading Summaries ▲ |              |
|                                                                                                       |        |                    |                                |              |
| Unit Type                                                                                             | Target | Baseline Units     | Units Required                 | Unit Deficit |
| Area habitat units                                                                                    | 20.00% | 0.14               | 0.17                           | 0.12         |
| Hedgerow units                                                                                        | 20.00% | 0.00               | 0.00                           | 0.00         |
| Watercourse units                                                                                     | 20.00% | 0.00               | 0.00                           | 0.00         |

## Trading Rules

- 3.4.8. Based on the on-site design, the Metric trading rules have not been met. Losses are within the low distinctiveness group and therefore according to the trading rules can be compensated for by the same distinctiveness or better habitat, i.e. compensation could be via a low distinctiveness or higher (most semi-natural habitat types). Therefore, meeting the trading rules is not a considered a significant challenge for the Proposed Development. f

## 3.5 Off-site Biodiversity Modelling

- 3.5.1. The number of area habitat units needed from off-site habitat creation or enhancement estimated to achieve 20% BNG in line with the Metric trading rules, and the Worthing Local Plan is 0.12 biodiversity units.

### BNG Best Practice Principles

- 3.5.2. The BNG assessment has been carried out considering the BNG Best Practice Principles. On agreement of the delivery mechanism for the current BNG deficit, a full assessment of compliance with the BNG Principles will be reported.

## 4 Recommendations and Next Steps

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- 4.1.1. There are several options available to deliver the required area habitat units. This includes reduction of impact, retention of habitat, creation of habitat onsite, off-site delivery, habitat bank provision or purchase of statutory credits as a 'last resort'.
- 4.1.2. The Proposed Development is within an urban area. The area is targeted for retail and commercial activities and will likely include future additional development. The wider retail park is already highly developed, however, there are pockets of semi-natural woodland habitat in the eastern area of the retail park. Habitat enhancement of this existing habitat could support the delivery of off-site BNG. Purchase of off-site habitat units from regional habitat banks should be explored.
- 4.1.3. Whilst possible in principle, it is not considered appropriate to take the option to deliver BNG by onsite habitat creation, beyond existing proposals, mainly due to the future difficulties of management and habitat retention, as well as the limited connectivity and functionality for biodiversity potential. For these reasons, combined with potential opportunities locally, delivery of biodiversity units off-site would be more appropriate.
- 4.1.4. The following recommendations apply to the Proposed Development in order to meet national and local policy and legislative requirements, as well as BNG good practice:
  - 1. All on-site options for habitat retention, enhancement and creation have been considered for the Proposed Development, in line with the Biodiversity Gain Hierarchy.
  - 2. Options to deliver BNG through off-site providers should be explored, and it is recommended that discussions with off-site providers should take place, and the purchase of Statutory Biodiversity Credits should only be considered as a last resort to offset residual habitat losses.
  - 3. On agreement of a delivery strategy for the current deficit of biodiversity units, a BNG Statement will be produced to support the planning application and outline how the BNG condition will be met.
  - 4. A final BGP will be prepared and submitted post-determination to discharge the general biodiversity gain condition pre-commencement.
  - 5. Update the Metric once the LNRS is published, in accordance with the Planning Advisory Service (PAS) transition guidance. The draft LNRS is expected to be published for public consultation in Autumn 2025.

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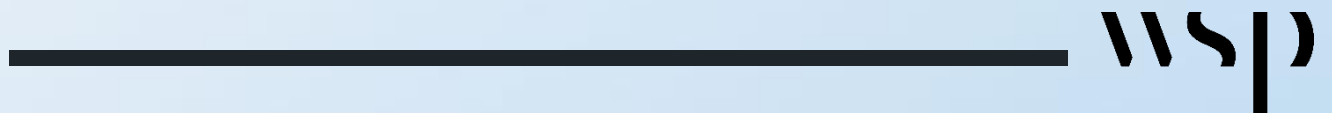
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# Appendix A

## Baseline and Post-intervention Habitat Maps





## Appendix A – Baseline & Post-Intervention Habitat Maps

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Kitchens



LEGEND:



Red line boundary

Habitat Description



g4 - modified grassland



u1b6 - other developed land

STATUS:

FOR INFORMATION ONLY



WSP House, 70 Chancery Lane  
London, WC2A 1AF  
Tel: +44 20 7314 5000  
www.wsp.com

CLIENT:

Columbia Threadneedle

PROJECT:

Lyons Farm Retail Park

TITLE:

Figure 1: Baseline Habitat Map

SCALE @A3:

1:250

DRAWN:

FK

APPROVED:

ML

VERSION:

01

DATE:

30/07/25

DATE:

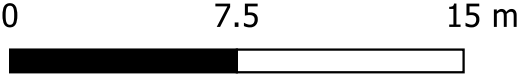
30/07/25

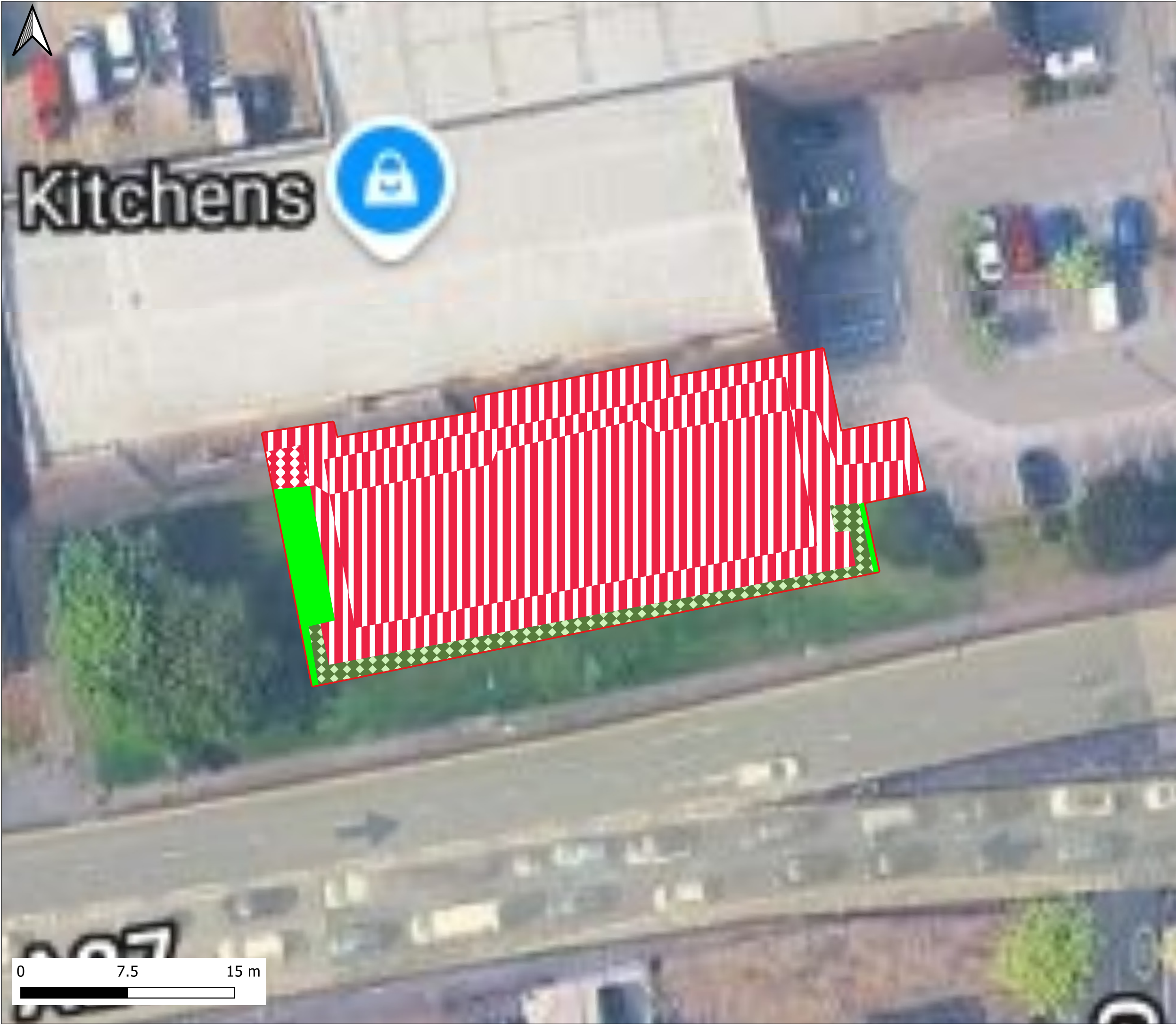
PROJECT No:

UK-70092047\_1

DRAWING No:

Figure 1





LEGEND:

Red line boundary

Habitat Description

g4 - modified grassland

u1b - developed land, sealed surface

u1b6 - other developed land

u 845 - ground level planters

STATUS:

FOR INFORMATION ONLY



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London, WC2A 1AF  
Tel: +44 20 7314 5000  
[www.wsp.com](http://www.wsp.com)

CLIENT:

Columbia Threadneedle

PROJECT:

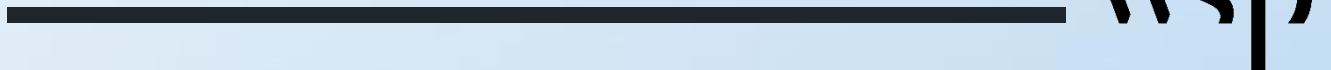
Lyons Farm Retail Park

TITLE:

Figure 2: Post development habitat map

# Appendix B

## BNG Legislation & Policy



## Appendix B – BNG Legislation and Policy

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### National legislation

#### England

#### Environment Act 2021

BNG is mandatory under Schedule 7a of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a). This means that most major developments (with exemptions) must deliver a minimum of 10% net gain for biodiversity as a condition of planning permission, measured by the Statutory Biodiversity Metric. There are six statutory instruments that work together to deliver the BNG framework including:

- The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2023 (HM Government, 2024e);
- The Biodiversity Gain Sites Register (Financial Penalties and Fees) Regulations 2023 (HM Government, 2023a);
- The Biodiversity Gain Site Register Regulations 2024 (HM Government, 2024f) ;
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (HM Government, 2024b);
- The Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024 (HM Government, 2024a); and
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 (HM Government, 2024d).

Under mandatory BNG, the Biodiversity Gain Hierarchy must be considered by LPAs when determining whether to approve a Biodiversity Gain Plan. Here, efforts must be made to first avoid then minimise adverse impacts in relation to on-site medium, high and very high distinctiveness habitats. Secondly, any adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits. All significant on-site gains and all off-site gains from a development must be legally secured, managed and maintained for a period of 30 years.

Mandatory BNG does not replace existing legislations and protections for sites, habitats and species.

The Environment Act 2021 also amended the Natural Environment and Rural Communities (NERC) Act 2006 (HM Government, 2006). This amendment extended the duty of public authorities (the 'Biodiversity Duty') beyond the original NERC Act, which referred only to

conservation, so that it included the enhancement of biodiversity in England. Further description of the NERC Act is provided below.

All government policy and guidance are collated under the Biodiversity Net Gain Collection (Defra, 2024g).

## UK Government's Environmental Improvement Plan

Biodiversity Net Gain is a key cross-cutting theme to deliver the environmental targets and commitments set out in the Government's Environmental Improvement Plan (Defra, 2023a).

## National Planning Policy Framework

The revised National Planning Policy Framework (NPPF) (HM Government, 2024g) refers to conserving and enhancing the natural environment. This requires Local Authorities in England to take measures to:

- Conserve and enhance biodiversity;
- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks within plans;
- Promote the conservation, restoration and enhancement of priority habitats, ecological networks and priority species within plans, in addition to secure measurable net gains for biodiversity; and
- Refuse planning permission for development, if significant harm resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for.

The revised NPPF refers to biodiversity and environmental net gains in the following paragraphs:

- Transport Infrastructure:
  - Paragraph 109. *"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
    - d) the environmental impacts of traffic and transport infrastructure can be identified assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for **net environmental gains**."*
- Planning decisions
  - Paragraph 125. *"Planning policies and decisions should a) encourage multiple benefits from both urban and rural land ... and taking opportunities to **achieve net environmental gains - such as developments that would enable new habitat creation or improve public access to the countryside**."*

- Paragraph 187. *“Planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.”*
- Paragraph 192. *“To protect and enhance biodiversity and geodiversity plans should b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing **measurable net gains for biodiversity**.”*
- 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; ... and d) ... “ development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can **secure measurable net gains for biodiversity** or enhance public access to nature where this is appropriate”.*

## Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities (NERC) Act (HM Government, 2006) requires public bodies, including local authorities, ‘*to have regard to the conservation of biodiversity in England when carrying out their normal functions*’.

Section 40 sets out the ‘Duty to Conserve and Enhance Biodiversity’, and states that:

- Paragraph 1. *“A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective”.* The general biodiversity objective is the “*conservation and enhancement of biodiversity in England*”.

Section 41 sets out that:

- Paragraph 1. *“The Secretary of State must... publish a list of the living organisms and types of habitat ... of principal importance for the purpose of conserving biodiversity”* based on consultation with Natural England; and that
- Paragraph 3a. The Secretary of State must *“a) take such steps... to further the conservation of the living organisms and types of habitat included in any list published under this section, or (b) promote the taking by others of such steps”.*



## Local BNG Policy

### Worthing Local Plan

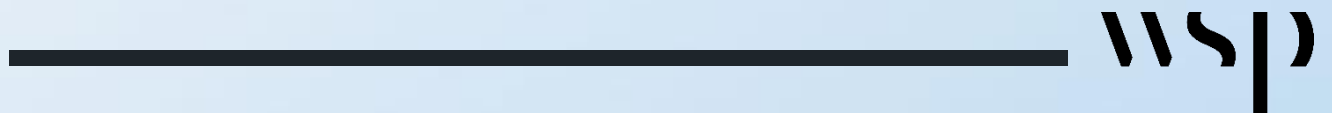
Worthing and Adur Council outline the following guidance relevant to BNG and this assessment, within the Worthing Local Plan 2023 (Worthing Borough Council, 2023).

Within the Local Plan, policy DM18 is concerned with biodiversity. Of particular relevance to this application is the following requirement:

*“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.”*

# Appendix C

## **Statutory Biodiversity Metric & Supplementary Files**





## Appendix C – Statutory Biodiversity Metric & Supplementary Files

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A completed Statutory Biodiversity Metric Excel toolkit has been provided alongside this report, please see the following file:

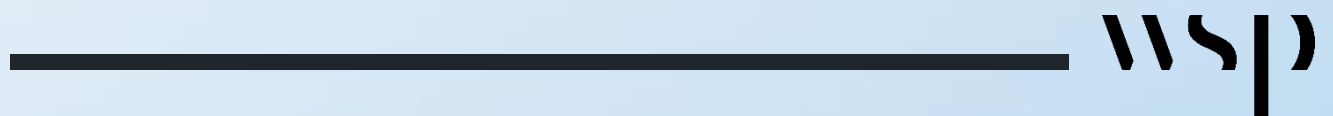
- Lyon's Farm BNG Statutory Metric

In addition, the following supplementary data has been provided:

- Lyon's Farm BNG Habitat Condition Assessment

# Appendix D

## Habitat & Hedgerow Condition Assessment Summary



# Appendix D – Condition Assessment Summary

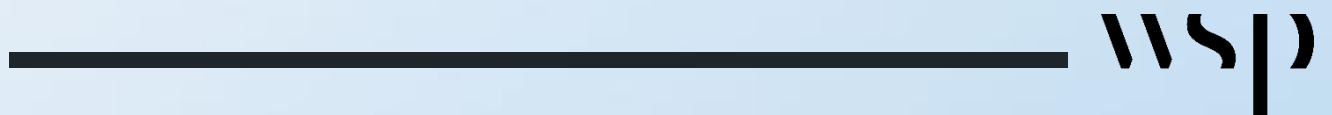
**Table D-1** provides a summary of baseline condition assessment results for area habitats and hedgerows. Full, detailed condition assessment results can be found in e.g. **Appendix C**].

**Table D-1 – Condition Assessment Summary for Area Habitats**

| Habitat reference or location | Condition sheets              | Total number of condition sheets used, or habitat parcels | Number of parcels of each condition achieved |             |          |             |      | Notes                                                                                                                                                                                                                |
|-------------------------------|-------------------------------|-----------------------------------------------------------|----------------------------------------------|-------------|----------|-------------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                               |                               |                                                           | Good                                         | Fairly Good | Moderate | Fairly Poor | Poor |                                                                                                                                                                                                                      |
| Lyons Farm Retail Park        | Grassland low distinctiveness | 1                                                         |                                              |             |          |             | 1    | There were less than six to eight plant species, and the sward height was low to the ground and regularly mown. There were no invasive species or bracken, and scrub covered less than 20% of the area of grassland. |

# Appendix E

## Post-Development Habitat Translation



## Appendix E – Post-Development Habitat Translation

Data Sources:

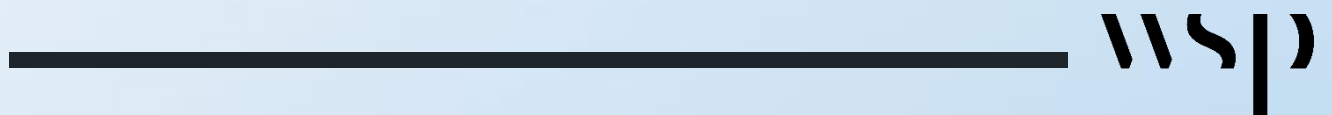
- Landscape Plan Ref. [16755-1-SFW-XX-XX-DR-L-1001 – Landscape Plan]

**Table E-1 – Translation of post-development habitats**

| Landscape Classification                                                                                                                                                                                                  | Metric habitat type           | Metric habitat justification                                                                                                                                                               | Target condition | Condition justification                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------------------------------------------------------------------------------------------------------|
| Ornamentation bark mulch surface finish, planted with four climbing species in 10L containers ( <i>Clematis armandii</i> , <i>Hedera colchica</i> , <i>Hydrangea anomala petiolaris</i> , <i>Lonicera periclymenum</i> ). | Urban – Ground Level Planters | This metric habitats includes plants in containers placed at ground level. The proposed habitat in the landscape plan includes climbing species planted in 10 litre ground level planters. | N/A              | This is a low distinctiveness urban habitat and condition assessments are not applicable to this habitat. |

# Appendix F

**BNG Good Practice Principles for  
Development (CIEEM, IEMA & CIRIA,  
2016)**



## Appendix F – BNG Good Practice Principles (CIEEM, IEMA & CIRIA, 2016)

| Principle                                                                    | Description                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Apply the mitigation hierarchy</b>                                     | Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere. |
| <b>2. Avoid losing biodiversity that cannot be offset by gains elsewhere</b> | Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.                                                                                                                                                                                                                                                                                                     |
| <b>3. Be inclusive and equitable</b>                                         | Engage stakeholders early, and involve them in designing, implementing, monitoring, and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.                                                                                                                                                                      |
| <b>4. Address risks</b>                                                      | Mitigate difficulty, uncertainty, and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.                                                                                              |
| <b>5. Make a measurable Net Gain contribution</b>                            | Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.                                                                                                                                                                                                                                                          |
| <b>6. Achieve the best outcomes for biodiversity</b>                         | <p>Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when:</p> <ul style="list-style-type: none"> <li>▪ Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses;</li> </ul>                                                    |

| Principle                          | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | <ul style="list-style-type: none"> <li>■ Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation;</li> <li>■ Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels;</li> <li>■ Enhancing existing or creating new habitat;</li> <li>■ Enhancing ecological connectivity by creating more bigger, better, and joined areas for biodiversity.</li> </ul>                                                                                                     |
| <b>7. Be additional</b>            | Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e., do not deliver something that would occur anyway).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>8. Create a Net Gain legacy</b> | <p>Ensure Net Gain generates long-term benefits by:</p> <ul style="list-style-type: none"> <li>■ Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity;</li> <li>■ Planning for adaptive management and securing dedicated funding for long-term management;</li> <li>■ Designing Net Gain for biodiversity to be resilient to external factors, especially climate change;</li> <li>■ Mitigating risks from other land uses;</li> <li>■ Avoiding displacing harmful activities from one location to another;</li> <li>■ Supporting local-level management of Net Gain activities.</li> </ul> |
| <b>9. Optimise sustainability</b>  | Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>10. Be transparent</b>          | Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |



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