

AtkinsRéalis



Biodiversity Net Gain Design Stage Assessment Report

West Sussex County Council

August 2026

20250040_ECO_RP_002

THE PINES, WORTHING

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Summary

Proposed Development	West Sussex County Council proposes to refurbish and remodel the existing building at The Pines, Worthing, to provide a Special Educational Needs and Disabilities (SEND) satellite provision for Oak Grove College. The Proposed Development includes refurbishment of Building B1, reconfiguration of external areas, landscaping works, creation of external learning and amenity spaces, five new urban trees and approximately 0.047 km of ornamental hedgerow. The Proposed Development requires planning permission and is subject to the statutory Biodiversity Net Gain (BNG) requirements under Schedule 7A of the Town and Country Planning Act 1990.
Desk studies and field surveys	A Preliminary Ecological Appraisal (PEA) was undertaken in June 2023. Updated ecological surveys, including a habitat survey, condition assessments, biodiversity metric survey and bat surveys, were completed by AtkinsRéalis in 2025. Baseline habitat data collected during these surveys has informed the Statutory Biodiversity Metric assessment. A desk study was undertaken on 20 July 2026 as part of the BNG assessment of the Proposed Development. Additionally, the desk study identified no irreplaceable habitats and protected sites within the Application Site.
Irreplaceable habitats	No irreplaceable habitats are present within the Application Site and no irreplaceable habitat losses will occur as a result of the Proposed Development.
Application of the BNG Principles, the Mitigation Hierarchy and the Biodiversity Gain Hierarchy	The Proposed Development has sought to minimise biodiversity impacts through retention and refurbishment of Building B1, retention of existing trees and retention of a small area of modified grassland (G6). Biodiversity enhancements have been incorporated through creation of other neutral grassland, vegetated garden habitat, five urban trees and a new ornamental hedgerow.
BNG Metric	The baseline biodiversity value of the Application Site is 0.97 area habitat units. The Proposed Development delivers 1.04 area habitat units, resulting in a net gain of 0.07 area habitat units (+7.06%). No baseline hedgerows are present; however, creation of approximately 0.047 km of ornamental hedgerow generates 0.04 hedgerow units. The statutory requirement for a minimum 10% biodiversity net gain is not currently achieved and the habitat trading rules are not satisfied due to the loss of medium distinctiveness bramble scrub habitat.
Actions required to deliver BNG	The Statutory Biodiversity Metric identifies a residual deficit of approximately 0.03 area habitat units. To achieve the statutory biodiversity gain objective and satisfy the habitat trading rules, additional biodiversity units will be required through further on-site habitat provision, registered off-site biodiversity gains or, as a last resort, statutory biodiversity credits.



1 Introduction

1.1 Terms of Reference

AtkinsRéalis has been instructed by West Sussex County Council, hereafter referred to as 'the Client', to provide a Biodiversity Net Gain (BNG) Design Stage assessment in relation to the Pines, Worthing (hereafter referred to as 'the Proposed Development'). The Proposed Development is in BN13 3PL; the footprint of the Proposed Development (hereafter referred to as 'the Application Site') is shown on the Site Location Plan (**Figure A-1**) provided in **Appendix A**.

The British Standard BS 8683:2021¹ defines BNG as “a specific, quantifiable outcome from project activities that deliver demonstrable benefits for biodiversity compared to the baseline situation.” It is an approach that aims to leave the natural environment in a measurably better state than beforehand.

This report is intended to form part of the Proposed Development's planning application submission to West Sussex County Council (for full planning consent under the Town and Country Planning Act 1990) in relation to meeting the biodiversity gain objective (the 'biodiversity gain condition') under the statutory framework for BNG. The objective is for development, within the scope of mandatory BNG, to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of a development site. The increase in biodiversity value can be achieved through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits.

The report provides an assessment of changes in biodiversity, as a result the Proposed Development, from a pre-development baseline to a post-development scenario. It follows the framework set out by the Chartered Institute of Ecology and Environmental Management (CIEEM)² for reporting in relation to BNG assessments. The assessment has been undertaken by a competent person with reference to the British Standard BS 8683:2021¹.

1.2 The Application Site

The Application Site comprises The Pines, a former adult training centre and associated grounds located in Worthing, West Sussex, at Ordnance Survey National Grid Reference TQ 11113 04472. It is shown on the Site Location Plan (**Figure A-1**) provided in **Appendix A**. The Application Site has remained vacant since 2022 and comprises an existing building, hardstanding, ornamental planting, grassland habitats, scattered trees and areas of scrub vegetation. Ten additional small trees were recorded within the Application Site during the Arboriculture Impact Assessment³. These trees are located within areas classified as vegetated garden habitat and have not been included as individual trees within the Statutory Biodiversity Metric. In accordance with the Statutory Biodiversity Metric User Guide⁴, small trees occurring within vegetated garden habitat are assumed to be accounted

¹ The British Standards Institution 2021. BS 8683:2021 Process for designing and implementing Biodiversity Net Gain – Specification. BSI Standards Limited 2021.

² CIEEM (2021). Biodiversity Net Gain Report and Audit Templates. Chartered Institute of Ecology and Environmental Management, Winchester, UK.

³ AtkinsRéalis (2026). The Pines SEND School, Arboriculture Impact Assessment report. [Accessed on: August 2026]

⁴ DEFRA (2024). The Statutory Biodiversity Metric User Guide. Natural England and Defra. Available at: https://assets.publishing.service.gov.uk/media/6a1d98e9c7335e2ca6daadd5/The_Statutory_Biodiversity_Metric_-_User_Guide_-_June_2026.pdf. [Accessed on: August 2026]



for within the habitat parcel and should not be separately included within the individual tree assessment to avoid double counting of biodiversity value.

The Application Site extends to approximately 0.40 ha and is located entirely within an existing developed urban setting. The Application Site is bounded by existing residential and urban land uses.

Within this report, any use of the term 'on-site' refers to the Application Site as described above, i.e. all land within the planning red line boundary of the Proposed Development. Any reference to 'off-site' is to any land outside of the Application Site (regardless of proximity or ownership), which may be considered in the assessment if meeting the biodiversity gain objective cannot be achieved through gains within the Application Site.

1.3 The Proposed Development

West Sussex County Council is proposing to refurbish and remodel the existing building to provide a 60-place Special Educational Needs and Disabilities (SEND) satellite provision for Oak Grove College.

The Proposed Development includes refurbishment and reconfiguration of the existing building to provide teaching accommodation, therapy and sensory facilities, staff accommodation and associated support spaces.

The Proposed Development also include external alterations and site reconfiguration works, including changes to existing hardstanding and landscaped areas, creation of external learning and amenity spaces, planting and landscaping works, and associated infrastructure within the existing Application Site boundary. The Proposed Development largely utilises the existing building footprint and developed areas through adaptive reuse of the existing facility.

The details of the Proposed Development, as they are currently understood, are shown in the External Arrangement Plan⁵ (**Figure A-2**) in **Appendix A**.

The Proposed Development requires full planning consent.

It is currently estimated that the construction programme for the Proposed Development will be approximately 44 weeks in length, starting in June 2027.

1.4 Relevant Legislation and Policy

1.4.1 Legislation

The Environment Act was given royal assent in November 2021. This is an act to make provision about targets, plans and policies in relation to the environment, including Part 6 of the Environment Act 2021 'nature and biodiversity', which allows for biodiversity gain in planning.

In England, Schedule 14 of the Environment Act 2021 makes provision for a 10% biodiversity gain to be a condition of planning permission through amendment of the Town and Country Planning Act 1990. It also makes provision for habitat creation and enhancements to deliver biodiversity gain to be maintained for a period of at least 30 years after the development is completed. Schedule 14 of the Environment Act 2021 was brought into force in 2024;

⁵ AtkinsRéalis (2026). PINES-ATR-XX-XX-D-L-401001_External Arrangement. [Accessed: July 2026].



BNG is now mandatory under Schedule 7A of the Town and Country Planning Act 1990 for most types of development. A summary of relevant BNG legislation is provided in **Appendix B**.

The Proposed Development is within the scope of mandatory BNG.

West Sussex County Council, as a public body, has a duty to conserve biodiversity under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (as amended).

The introduction of the Environment Act 2021 strengthens this biodiversity duty by amending Section 40 of the Act 2006 so that public bodies also have a duty to enhance biodiversity. Public bodies must now:

- Consider what they can do to conserve and enhance biodiversity.
- Agree policies and specific objectives based on their consideration.
- Act to deliver their policies and achieve their objectives.

1.4.2 Policy

1.4.2.1 National Policy

The National Planning Policy Framework (NPPF)⁶ “provides a framework within which locally-prepared plans can provide for housing and other development in a sustainable manner”. It emphasises the importance of protecting and enhancing the natural environment. In relation to BNG, the NPPF states the following:

- Paragraph 187 (d) *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.*
- Paragraph 192 (b) *To protect and enhance biodiversity and geodiversity, plans should:*
 - *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 (d) *When determining planning applications, local planning authorities should apply the following principles:*
 - *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.*

1.4.2.2 Local Policy

The adopted Worthing Local Plan (2023)⁷ forms part of the statutory development plan for the Application Site and contains policies relating to the protection and enhancement of biodiversity and green infrastructure. Whilst the

⁶ Ministry of Housing, Communities & Local Government. *National Planning Policy Framework*. MHCLG, December 2024.

⁷ Worthing Borough Council (2023). *Worthing Local Plan 2020–2036* (Adopted March 2023). Worthing Borough Council. Available at: <https://www.adur-worthing.gov.uk/worthing-local-plan-2023/>. [Accessed: August 2026].



Local Plan supports the conservation and enhancement of biodiversity, no local policy requirement has been identified that exceeds the statutory biodiversity net gain requirement of 10%.

Additional guidance is provided through the Adur & Worthing Biodiversity Net Gain Technical Advice Note (2026)⁸ and the Worthing Green Infrastructure and Biodiversity Supplementary Planning Document (2026)⁹, which support the implementation of the statutory biodiversity net gain framework and application of the mitigation hierarchy. Accordingly, the Proposed Development has been assessed against the statutory requirement to achieve a minimum 10% BNG.

1.5 Scope of the Assessment

Biodiversity metrics provide a way of measuring and accounting for biodiversity losses and gains resulting from development and/or land management change.

This BNG Design Stage assessment quantifies the baseline biodiversity value of land within the Application Site (using habitat as a proxy and measured in biodiversity units), quantifies the habitats to be lost, retained and/or enhanced, and predicts the post-development biodiversity units to be delivered as part of the Proposed Development. The assessment is based on the proposed External Arrangement Plan (see **Appendix A**) and the Arboriculture Impact Assessment report available at the time of assessment (03 August 2026). Additionally, the assessment has been informed by the findings of the RIBA Stage 2 Ecology Report¹⁰ prepared for The Pines SEND School development. The report provides an overview of the existing ecological baseline, identifies key ecological constraints and opportunities, and outlines design recommendations to support biodiversity enhancement within the Proposed Development.

The Statutory Biodiversity Metric¹¹, hereafter referred to as 'the Metric', has been used to calculate biodiversity units and measure the change in biodiversity at the Application Site, as a result of the Proposed Development.

The Metric sets out four rules that must be followed in applying the Metric; BNG cannot be claimed if the rules are not followed. Where appropriate to the assessment, these rules are discussed in the relevant sections of this report.

The scope of this assessment is to inform the Client how the Proposed Development will meet the biodiversity gain objective under the statutory framework for BNG, whether this will be through on-site biodiversity gains or whether registered off-site biodiversity gains or statutory biodiversity credits will need to be considered. It will be used to inform the Biodiversity Gain Plan, which will need to be submitted and approved by West Sussex County Council before commencement of the Proposed Development.

This document must be read with 20250040_ECO_RP_002 - The Pines, Worthing_SBM_ISSUE.

⁸ Adur & Worthing Councils (2026). Biodiversity Net Gain Technical Advice Note. Adur & Worthing Councils. Available at: https://www.adur-worthing.gov.uk/media/Media_174402.smxx.pdf. [Accessed: August 2026].

⁹ Worthing Borough Council (2026). Green Infrastructure and Biodiversity Supplementary Planning Document. Worthing Borough Council. Available at: <https://www.adur-worthing.gov.uk/worthing-ldf/spd-and-guidance/#green-infrastructure-and-biodiversity>. [Accessed: August 2026].

¹⁰ AtkinsRéalis (2025). RIBA Stage 2 Ecology Input, The Pines. [Accessed: July 2026]

¹¹ www.gov.uk. 2024. Statutory biodiversity metric tools and guides. [online] Available at: [Statutory biodiversity metric tools and guides - GOV.UK](#) [Accessed: August 2026].



2 Methods

2.1 Desk Study

2.1.1 Irreplaceable Habitats, Protected Sites and Priority Habitats

A desk study was undertaken on 20 July 2026 as part of the BNG assessment of the Proposed Development. In relation to this BNG Design Stage assessment, the desk study was used to identify any important ecological features (e.g. irreplaceable habitats, statutory designated nature conservation sites, priority habitats), which may influence the feasibility of delivering BNG, within and adjacent to the Application Site.

To identify any of these features, the following online data sources were accessed:

- Multi-Agency Geographic Information for the Countryside (MAGIC)¹²
- Ancient Tree Inventory¹³

2.1.1.1 Irreplaceable Habitats

Impacts to irreplaceable habitats are not adequately measured by the Metric and they require separate consideration outside of the statutory framework for BNG, which complies with relevant policy, legislation and regulations. The statutory biodiversity gain objective is not applied to losses or deterioration of irreplaceable habitat. The list of irreplaceable habitats considered within the statutory framework for BNG, as set out in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, is provided in **Table B-1**.

2.1.1.2 Protected Sites

Development on statutory designated sites for nature conservation (e.g. Sites of Special Scientific Interest) is not exempt from the statutory biodiversity gain objective. However, development needs to be compliant with relevant policy and guidance to prevent BNG being used as a justification for otherwise unacceptable development on such sites, i.e. there needs to be strict adherence to the mitigation hierarchy and development will not be consented on the justification that habitat losses can be easily offset using the BNG approach.

2.1.1.3 Priority Habitats

The NPPF⁶ promotes the conservation, restoration and enhancement of priority habitats. These are habitats that have been deemed to be of principal importance for the purpose of conserving biodiversity and have been identified as such by being listed on Section 41 of the NERC Act 2006; West Sussex County Council will take their presence into account in their planning decision making.

¹² magic.defra.gov.uk. 2024. MagicMap Application. [online] Available at: <https://magic.defra.gov.uk/MagicMap.html> [Accessed: July 2026].

¹³ ati.woodlandtrust.org.uk. 2025. AncientTree Inventory – Woodland Trust. [online] Available at: <https://ati.woodlandtrust.org.uk/> [Accessed: July 2026].



2.1.2 Strategic Significance

The Metric applies a strategic significance score based on whether the location of a site and/or the baseline habitats present within a site or proposed habitat interventions have been identified as being locally important for biodiversity. The relevant Local Nature Recovery Strategy (LNRS) should be used to assign strategic significance.

The West Sussex LNRS was published in June 2026. The LNRS documents and associated mapping were reviewed on the LNRS website¹⁴.

As the LNRS is now published, strategic significance for baseline habitats is assigned as 'Low' in accordance with the Metric User Guide¹¹. For post-development habitats, strategic significance is assigned according to whether the proposed habitat type aligns with an LNRS 'potential measure' in the mapped location. 'High' strategic significance can be applied if the post-development intervention accords with a potential measure that has been proposed to help deliver the priorities of the LNRS.

2.2 Baseline Conditions

A field survey to record habitat types was undertaken on 17 July 2026. The survey comprised identifying the habitats present within the Application Site, using the classification system that the Metric predominantly uses in the area habitat module and the hedgerow module (the UK Habitat Classification (UKHab)¹⁵), and undertaking condition assessments of the habitats. Condition assessment scores were assigned using professional judgement and the criteria for habitat in 'good', 'moderate', or 'poor' condition as set out in the relevant condition assessment sheets in Technical Annex 1 of the Metric¹¹.

The survey was led by a suitably experienced AtkinsRéalis ecologist with a Level 4 Field Identification Skills Certificate (FISC) and who has appropriately evidenced their competency as being capable in the identification of habitats and plant species in accordance with the CIEEM Competency Standard for Preliminary Habitat Survey¹⁶. Further information regarding the survey methods, including the names of surveyors, can be provided by the Client/AtkinsRéalis upon request.

The survey data was collected using ESRI ArcGIS FieldMaps v. 26.2.0 and then exported and analysed using QGIS v.3.34.11. GIS specialists processed the habitat mapping data to remove small overlaps and gaps between polygons that result from digitising at low resolution. The habitat survey data was then clipped to exclude habitat data outside of the Application Site boundary. Using QGIS, areas (measured in ha) were calculated for each area habitat feature and, where present, lengths (measured in km) were calculated for hedgerow and watercourse features. Habitat parcels were then created, linking areas/lengths of habitat of the same distinctiveness, condition and strategic significance.

To calculate the area of any individual trees within the Application Site, the 'tree helper' tool embedded within the Metric was utilised. This tool calculates the projected area of individual trees according to their size (small, medium, or large) measured as 'diameter at breast height' (i.e. diameter measured at 1.5 m above ground).

¹⁴ West Sussex. Local Nature Recovery Strategy, Part 2 - Priorities, Measures and the Local Habitat Map. Available at: <https://www.sussexnaturerecovery.org.uk/media/2025/12/Part%202%20LNRS%20West%20Sussex.pdf>. [Accessed: August 2026]

¹⁵ UKHab Ltd (2023). *UK Habitat Classification Version 2.0* (at <https://www.ukhab.org>)

¹⁶ CIEEM (2023). Competency Standard for Preliminary Habitat Survey Version 2. [online] Available at: <https://cieem.net/wp-content/uploads/2023/03/Preliminary-Habitat-Survey-Competency-Standard-V2-February-2023.pdf>



The method for assigning baseline strategic significance is set out in **Section 2.1.2**.

2.3 Proposed Design

The proposed External Arrangement Plan (see **Appendix A**) and the Arboriculture Impact Assessment report available at the time of assessment (03 August 2026) have been used to assess the post-development scenario. These plans were converted from CAD software to a QGIS environment where it was overlaid on the baseline habitat data. Areas and lengths of proposed design features, including built development and habitat creation and/or habitat retention/enhancement, were calculated using QGIS. The GIS shapefiles were inspected for any overlaps, gaps, or duplications, and all polygons and lines were snapped correctly, in order to correctly represent the area or length of each habitat type.

The proposed design features were translated to appropriate Metric habitat types and target condition scores were assigned based on the realistic likelihood of achieving the target condition.

2.4 Calculating BNG Units using the Metric

The Metric uses several measures to quantify baseline biodiversity value for each habitat type within a site boundary. These measures include the habitat's distinctiveness (a measure based on the type of habitat and its distinguishing features), its condition (a measure of the habitat against its ecological optimum state) and its size (ha for area habitat/km for linear habitat). In addition, the local strategic significance of a site and/or the habitats within it is taken into account by applying a strategic significance multiplier.

Area habitat units, hedgerow units and watercourse units are calculated in separate modules of the Metric. Rule 2 of the Metric states *"Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit."*

A habitat's distinctiveness score is derived from its intrinsic biodiversity value, reflecting species richness and rarity, the extent to which it is protected by designations and the degree to which it supports species rarely found elsewhere. This score is pre-assigned in the Metric.

The calculation of watercourse units includes additional multipliers that take into account whether a watercourse has been modified by built development through the presence of encroachment into the watercourse channel or riparian zone, i.e. the multipliers reduce the number of watercourse units to reflect the negative impact that such encroachment has on a naturally functioning river system.

Post-development biodiversity units are calculated the same way but with the addition of temporal and risk multipliers that take into account the average time it takes between starting habitat creation or enhancement and that habitat reaching its target distinctiveness or condition (time to target condition) and the difficulty¹⁷ in creating or enhancing habitat. These temporal and risk related multipliers are set within the Metric and cannot be changed. Where habitat creation or enhancement is off-site, biodiversity units are calculated the same way but a spatial risk multiplier is applied based on the distance of the off-site habitat creation or enhancement to the on-site habitat loss.

¹⁷ A measure which represents the uncertainty in the effectiveness of management techniques used to enhance or create habitat.



The Metric also takes into account whether habitat creation or enhancement is delivered in advance of any impact it is compensating for or whether there will be any significant delay in an intervention relative to the impact. If taken into account, the standard temporal multiplier is adjusted accordingly.

To calculate the overall net change in biodiversity units, the baseline biodiversity units are subtracted from the post-development biodiversity units, as shown in **Figure 2-1**.

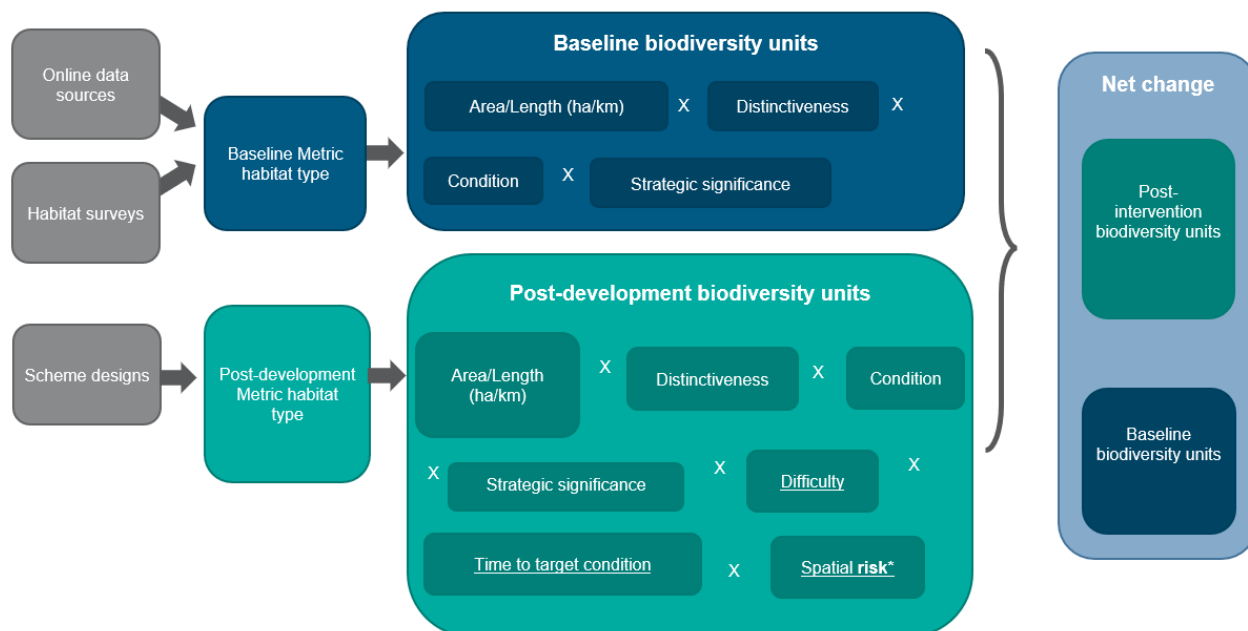


Figure 2-1 – Calculation of Biodiversity Units using the Metric

NB. Illustration does not fully depict calculation of watercourse units; additional multipliers taking into account watercourse and riparian encroachment are applied.

Text underlined indicates a risk factor applied when creating or enhancing habitats.

*Applies to off-site habitat interventions only.

There are no watercourse features within the Application Site; therefore, only the area & hedgerow habitat modules of the Metric has been used in this assessment.

2.5 Trading Rules

Rule 1 of the Metric states “*The trading rules of this biodiversity metric must be followed*”. The trading rules set minimum habitat creation and enhancement requirements to compensate for specific habitat losses, up to the point of no net loss. They are based on the habitat type and distinctiveness of the lost habitat. The trading rules are set out in **Table 2-1**.

Table 2-1 - Habitat Trading Rules

Baseline habitat distinctiveness	Area habitat	Hedgerow
Very high	Priority should be given to replacing losses with area habitat units of the same habitat type (bespoke compensation likely to be required)	Losses must be replaced with hedgerow units of the same habitat type
High	Losses must be replaced with area habitat units of the same habitat type	Losses must be replaced with hedgerow units of the same habitat type or of a higher band
Medium	Losses must be replaced by area habitat units of either medium band habitats within the same broad habitat type or, any habitat from a higher band from any broad habitat type	Losses must be replaced with hedgerow units of the same or of a higher band
Low	Losses must be replaced with area habitat units of the same or higher band	Losses must be replaced with hedgerow units of the same or of a higher band
Very low	Not applicable	Losses must be replaced with hedgerow units of the same or of a higher band

2.6 BNG Principles, Mitigation Hierarchy and Biodiversity Gain Hierarchy

Use of the Metric is underpinned by several principles. Amongst these, Principle 3 states “*This biodiversity metric should be used in accordance with established good practice guidance and professional codes*”. To claim BNG, evidence that demonstrates a project has clearly applied all ten of the good practice principles for achieving BNG¹⁸ (see **Appendix C**) must be provided. Adhering to all principles together underpins the good practice required for achieving and sustaining BNG.

Expanding on Principle 1 of the good practice principles for achieving BNG, the mitigation hierarchy (see **Appendix C**) and the avoidance of impacts to irreplaceable habitats must be applied when committing to achieving BNG. This is reinforced through the publication of the British Standard BS 8683:2021¹. Application of the mitigation hierarchy is encouraged by the Metric because BNG can be more easily achieved by avoiding the loss of habitat through either retention or enhancement. Principle 2 of the Metric adds “*The use of this biodiversity metric does not override*

¹⁸ CIEEM, CIRIA, IEMA. 2016. Biodiversity Net Gain: Good practice principles for development.



existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.”

In determining whether to approve the Biodiversity Gain Plan, a planning authority must take into account how the Biodiversity Gain Hierarchy (see **Appendix C**) will be followed, and any reasons where it cannot be followed. It is distinct from the mitigation hierarchy and has been designed to reflect the habitat types within the Metric and the ways that the statutory biodiversity gain objective can be achieved. The planning authority will take into account how it has been applied in their planning decision making and whether to approve the Biodiversity Gain Plan.

2.7 Assumptions and Limitations

For this assessment, it has been assumed that habitat creation will commence one year following the loss of baseline habitats associated with the Proposed Development. The standard temporal multipliers within the Statutory Biodiversity Metric have been adjusted accordingly.

The target conditions assigned to proposed habitats have been informed by the available outline landscape specification and reflect a realistic assessment of the condition likely to be achieved under the proposed management regime. It is assumed that all habitat creation proposals will be implemented in accordance with the approved landscape design and that appropriate management and maintenance will be undertaken throughout the establishment period and subsequently maintained for a minimum of 30 years.

Additionally, due to the loss of habitat and the application of temporal and delivery risk multipliers within the Statutory Biodiversity Metric, a residual deficit remains. Consequently, it is assumed that this shortfall will be addressed through appropriate compensation measures, such as revisions to the landscape design, additional on-site habitat creation or purchase of off-site biodiversity units from an accredited provider. If opting for off-site units, the habitats delivering these units will be subject to a Habitat Management and Monitoring Plan (HMMP), prepared by the unit provider and secured through an appropriate legal mechanism (e.g. a Section 106 agreement¹⁹ or conservation covenant²⁰) for a minimum period of 30 years in accordance with the requirements of the Environment Act 2021. Details of the off-site habitat delivery, including the associated HMMP, will be provided to and approved by West Sussex County Council as part of the Biodiversity Gain Plan, or through a suitably worded planning condition, prior to commencement of development.

The Metric also identifies a deficit associated with the loss of medium distinctiveness bramble scrub habitat, resulting in the habitat trading rules not being satisfied. It is assumed that this deficit will be addressed through the provision of additional habitat of an appropriate distinctiveness and broad habitat type, either on-site or through registered off-site biodiversity units, prior to commencement of development.

A total of ten additional small trees were recorded within areas classified as vegetated garden habitat during the baseline survey. In accordance with the Statutory Biodiversity Metric User Guide, these trees have not been included as individual trees within the area habitat calculations as small trees occurring within vegetated garden habitat are considered to be represented within the habitat parcel itself. Excluding these trees avoids double counting of biodiversity value within the Metric.

¹⁹ MHCLG, GOV.UK (2026). Policy statement: a roadmap for Section 106 delivery in England, Available at: <https://www.gov.uk/government/publications/policy-statement-a-roadmap-for-section-106-delivery-in-england/policy-statement-a-roadmap-for-section-106-delivery-in-england>. [Accessed: August 2026]

²⁰ GOV.UK (2024). Getting and using a conservation covenant agreement. Available at: <https://www.gov.uk/guidance/getting-and-using-a-conservation-covenant-agreement>. [Accessed: August 2026]



The desk study search for irreplaceable habitats (including ancient and veteran trees) and priority habitats used online sources as set out in **Section 2.1.1**. These datasets are not entirely accurate and some irreplaceable or priority habitats that are present on Site may not be present in the datasets. The field survey aimed to search for these features; as such, this is not considered to be a significant constraint.



3 Baseline Conditions

3.1 Desk Study

3.1.1 Irreplaceable Habitats, Protected Sites and Priority Habitats

The desk study identified no irreplaceable habitats and protected sites within the Application Site.

3.1.2 Strategic Significance

As the LNRS is now published, strategic significance for baseline habitats is assigned as 'Low' in accordance with the Metric User Guide¹¹.

3.2 Pre-Development Biodiversity Value

The following sections summarise, for each module (area and hedgerow), the pre-development biodiversity value of the Application Site. Field survey data to inform the Metric calculations was collected on 15 July 2026. There is no indication that unauthorised activities have been undertaken at the Application Site between 30 January 2020 and the date of the field survey, which may have resulted in degradation of on-site habitat. The pre-development biodiversity value is considered to be accurate for the date of the survey (15 July 2026) and is relevant to the date of the application.

3.2.1 Area Habitat Baseline

The area habitat baseline of the Application Site is summarised in **Table 3-1**. The area habitat features present within the Application Site are shown on the Habitat Baseline Plan (**Figure D-1**) provided in **Appendix D**. Condition assessment sheets, where required, are provided in **Appendix E**. These provide summary descriptions of the area habitat features present and the results of their condition assessment. Photographs of the habitats are provided in **Appendix F**.



Table 3-1 - Area Habitat Baseline

Habitat parcel reference	Broad habitat	Habitat type	Irreplaceable habitat	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat units
G4	Grassland	Modified grassland	No	0.0034	Low	Good	Low	0.02
G5, G6	Grassland	Modified grassland	No	0.0109	Low	Poor	Low	0.02
G3	Grassland	Other neutral grassland	No	0.0027	Medium	Good	Low	0.03
G1, G2	Grassland	Other neutral grassland	No	0.0183	Medium	Moderate	Low	0.15
S1	Heathland and shrub	Bramble scrub	No	0.0059	Medium	N/A	Low	0.02
D1	Urban	Developed land; sealed surface	No	0.1473	V. Low	N/A	Low	0.00
B1, B2, B3, B4, B5	Urban	Developed land; sealed surface (Buildings)	No	0.1306	V. Low	N/A	Low	0.00
SM3, SM7, SM13, SM14	Urban	Introduced shrub	No	0.0419	Low	N/A	Low	0.08
SM1, SM2, SM4, SM5, SM6, SM8, SM9, SM10, SM11, SM12	Urban	Vegetated garden	No	0.0358	Low	N/A	Low	0.07



Habitat parcel reference	Broad habitat	Habitat type	Irreplaceable habitat	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat units
T7	Individual trees	Urban tree	No	0.0163 ²¹ (1 x medium tree)	Medium	Good	Low	0.20
T1, T2, T3, T4, T6	Individual trees	Urban tree	No	0.0448 (3 x small and 2 x medium trees)	Medium	Moderate	Low	0.36
T5	Individual trees	Urban tree	No	0.0041 (1 x small tree)	Medium	Poor	Low	0.02
Total habitat area (ha)				0.46				
Total site area (excluding area of individual trees, green walls, intertidal hard structures)				0.40				
Total habitat units								0.97

²¹ The Metric allows the value of individual trees to be measured and has a 'tree helper' function to automate an area calculation that can be used in the Metric. This area is not included in the total Site area.

