



BIODIVERSITY NET GAIN FEASIBILITY ASSESSMENT

**57 The Broadway
Haywards Heath
West Sussex
RH16 3AS**

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on behalf of

Robblewood Projects Ltd

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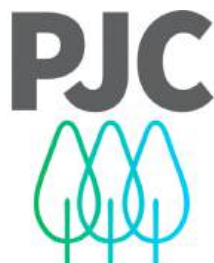
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Naomi is an Ecologist with five years' experience working in the ecological consultancy industry. She gained a BSc(Hons) in Animal Conservation and Biodiversity at Greenwich University in 2018 and an MSc in Oceanography (Ecological and Biological pathway) at the University of Southampton in 2021. In addition, Naomi is a Natural England class one licence holder for bats and accredited agent under a BTO Schedule 1 Disturbance Permit for nest recording of barn owl (and other birds).

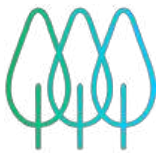
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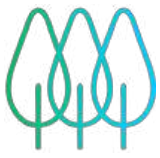


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CONTENTS

1	INTRODUCTION	4
1.1	Instruction	4
1.2	Document Objectives	4
1.3	Legislation and Planning Policy	4
1.4	Statutory Biodiversity Metric Rules / Principles	4
1.5	Site Description	5
1.6	Documents and Information Provided	5
2	METHODOLOGY	6
2.1	Approach to Biodiversity Net Gain	6
2.2	Competency of Assessor	6
2.3	Biodiversity Unit Calculation: Pre-Development (Baseline)	6
2.4	Biodiversity Unit Calculation: Post-Development	8
2.5	Limitations	8
3	BIODIVERSITY UNIT CALCULATION: PRE-DEVELOPMENT (BASELINE)	9
3.1	Irreplaceable Habitats	9
3.2	Habitats	9
3.3	Hedgerows	9
3.4	Watercourses	9
4	BIODIVERSITY UNIT CALCULATION: POST-DEVELOPMENT	11
4.2	Habitats	11
4.3	Hedgerows	11
4.4	Watercourses	11
5	CONCLUSION	13
6	NEXT STEPS	13
7	REFERENCES	14
8	APPENDICES	15
	Appendix I: Site Location Plan	15
	Appendix II: Baseline Habitat Map	16
	Appendix III: Proposed Habitat Map	17



1 INTRODUCTION

1.1 Instruction

- 1.1.1 PJC Consultancy Ltd was commissioned by Robblewood Projects Ltd to undertake a Biodiversity Net Gain (BNG) Feasibility Assessment in support of the proposed development at 57 The Broadway, Haywards Heath, West Sussex, RH16 3AS (hereafter referred to as the ‘Site’).

1.2 Document Objectives

- 1.2.1 The aim of this BNG Feasibility Assessment is to:
- Ascertain the biodiversity value of the Site pre-development (i.e. the ‘baseline’);
 - Ascertain the anticipated biodiversity value of the Site post-development;
 - Provide a summary of the overall BNG calculations; and
 - Provide recommendations to achieve BNG based on recognised good practice principles.

1.3 Legislation and Planning Policy

- 1.3.1 In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Schedule 14 of the Environment Act 2021 makes provision for biodiversity gain to be a condition of planning permission in England. The statutory framework for BNG has been designed as a post-permission matter to ensure that the biodiversity gain objective of achieving at least a 10% gain in biodiversity value will be met for development granted planning permission. Once planning permission has been granted, unless exempt, a ‘Biodiversity Gain Plan’ must be submitted and approved prior to the commencement of that development. This ‘Biodiversity Gain Plan’ is the mechanism to ensure that the biodiversity gain objective is met and in particular the post-development biodiversity value of the development’s onsite habitat is accurate based on the approved plans and drawings for the development.

1.4 Statutory Biodiversity Metric Rules / Principles

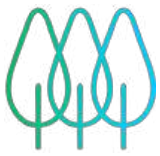
- 1.4.1 The following rules and principles underpin the use of the ‘Statutory Biodiversity Metric’ and have been applied during the design and consultancy process. The rules and principles have informed the use of the ‘Statutory Biodiversity Metric’ and the contents of this BNG Feasibility Assessment.

Table 1: Biodiversity Metric Rules.

Rule	Rule Detail
1	The trading rules of this biodiversity metric must be followed.
2	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.
3	To accurately apply the biodiversity metric formula, you must use the ‘Statutory Biodiversity Metric’ calculation tool or small sites biodiversity metric tool (SSM) for small sites.
4	In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

Table 2: Biodiversity Metric Principles.

Principle	Principle Detail
1	The metric assessment should be completed by a competent person.
2	The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any



Principle	Principle Detail
	other requirements. This includes consenting or licensing processes, for example woodlands.
3	This biodiversity metric should be used in accordance with established good practice guidance and professional codes.
4	This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
5	Biodiversity units are a proxy for biodiversity and should be treated as relative values.
6	This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.
7	Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
8	Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.
9	This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to: maintain habitat extent - supporting more, bigger, better and more joined up ecological networks; and ensure that proposed or retained habitat parcels are of sufficient size for ecological function.

1.5 Site Description

- 1.5.1 The Site, approximately 0.04ha in size, lies within the town of Haywards Heath, west of The Broadway (centred on OS Grid Reference TQ 32994 24091). The Site is bordered by retail and residential premises on the northern and southern extents. The western extent of the Site is bordered by a densely vegetated railway embankment lined with mature trees. The wider landscape is predominantly comprised of residential and commercial properties. The location of the Site within its environs is presented in Appendix I.

1.6 Documents and Information Provided

- 1.6.1 Development proposals are anticipated to include an extension to the rear of the building along with the removal of the existing roof to allow for an upward extension at the frontage.
- 1.6.2 The following documents were used to aid the preparation of this report:
- 57 Broadway Pre-application Document (ECE Architecture August 2025);
 - Tree Constraints Plan and Survey Schedule ref: PJC/6998/25/01 (PJC Consultancy, 2025);
 - Block Plan ref: PL02 (ECE Architects, 2026); and
 - Proposed Site Layout - Roof Plan ref: PL03 (ECE Architects, 2026).
- 1.6.3 This BNG Feasibility Assessment report should be read in conjunction with the initial preliminary ecological appraisal (PEA) report ref: 6671E/25 (PJC Consultancy, 2025).



2 METHODOLOGY

2.1 Approach to Biodiversity Net Gain

- 2.1.1 This BNG Feasibility report adheres to the recognised biodiversity net gain: good practice principles for development (CIEEM, CIRIA and IEMA, 2019).

2.2 Competency of Assessor

- 2.2.1 The author of this report, Naomi Cornwell BSc(Hons) MSc has been a practising ecologist in ecological consultancy since 2020. During this time, Naomi Cornwell has assisted on and completed multiple BNG Feasibility Assessments and accompanying reports, using both the Statutory Biodiversity Metric (and previous versions) and Small Sites Metric.

2.3 Biodiversity Unit Calculation: Pre-Development (Baseline)

- 2.3.1 The total number of number of 'habitat units', 'hedgerow units' and 'watercourse units' (hereafter collectively referred to as 'biodiversity units') generated by the Site pre-development (the ecological baseline) was calculated for all area habitats (habitat units) and linear terrestrial and aquatic / riparian habitats (hedgerow and watercourse units) within the Site, which accounts for the area/length, distinctiveness, condition and strategic significance of each habitat parcel recorded. The ecological baseline was calculated using the 'Statutory Biodiversity Metric'.
- 2.3.2 The DEFRA Statutory Biodiversity Metric uses habitat areas (in hectares (ha)) as its core measurement, except for hedgerow and watercourse habitats where habitat length is used (in kilometres (km)). For individual trees (which is considered area-based habitat), the DEFRA Statutory Biodiversity Metric tool contains a tree helper which automatically generates an area value based on the trees diameter at breast height.
- 2.3.3 The habitat type and area/length as well as the condition of each habitat parcel was informed from habitat data collected during the ecological walkover survey and habitat condition assessment undertaken on the 19th November 2025 by Naomi Cornwell BSc(Hons) MSc.
- 2.3.4 In accordance with recognised good practice principles, the 'Statutory Biodiversity Metric' excludes protected and irreplaceable habitats (i.e. ancient woodland, ancient and veteran trees, blanket bog, sand dunes, salt marsh and lowland fen).
- 2.3.5 The 'Statutory Biodiversity Metric' also accounts for various multipliers such as strategic significance. The strategic significance of each habitat accounts for whether or not each habitat is situated within an area identified locally, typically in a relevant policy of plan, as being of significance for nature.
- 2.3.6 The 'Statutory Biodiversity Metric' operates by applying a score or multiplier to each of these separate variables (distinctiveness, condition and strategic significance). It then multiplies the area/length of each habitat using each of these scores/multipliers to produce a number that represents the biodiversity unit value of each distinct habitat, hedgerow and/or watercourse. The ecological baseline of the Site is calculated by totaling the units across all habitats, hedgerows and watercourses within the Site.

Habitat Distinctiveness

- 2.3.7 Habitat distinctiveness is defined as a collective measure of biodiversity, including parameters such as species richness, diversity, rarity and the degree to which a habitat supports species rarely found in other habitats.
- 2.3.8 The distinctiveness of each habitat is preassigned in the 'Statutory Biodiversity Metric'. The distinctiveness bands are based upon the UK Habitat Classification System. A combination of simple rules and expert judgement have been used to assign each habitat type to the appropriate distinctiveness band. The DEFRA distinctiveness bands, and corresponding scores are as follows:



- Very high (8);
- High (6);
- Medium (4);
- Low (2); and
- Very low (0).

Habitat Condition

2.3.9 Habitat condition is defined as the quality of a particular habitat which measures the biological 'working-order' of a habitat type judged against the perceived ecological optimum state for that particular habitat, as it considers how many of the key physical characteristics and typical species of a particular habitat type are present in a habitat.

2.3.10 Habitat condition assessment bands were assigned to each habitat using condition assessment criteria detailed within the appropriate habitat condition sheet as presented in the Statutory Biodiversity Metric Technical Supplement (Natural England, 2024). These condition assessment criteria list positive indicators for each habitat and indicate how many of these indicators need to be present to meet certain thresholds of condition. The habitat condition bands and corresponding scores are as follows:

- Good (3);
- Fairly Good (2.5);
- Moderate (2);
- Fairly Poor (1.5); and
- Poor (1).

Strategic Significance

2.3.11 Strategic significance in the 'Statutory Biodiversity Metric' considers the importance of each habitat on a landscape scale, for example whether habitats are situated in preferred locations for biodiversity and other environmental objectives.

2.3.12 Strategic significance utilises published local plans and objectives to identify local priorities for targeting biodiversity and nature conservation objectives, such as Nature Recovery Areas/Networks, Biodiversity Opportunity Areas, local biodiversity action plans and green infrastructure strategies. In summary, proposed developments within areas of strategic significance are assigned a higher strategic position multiplier than proposed developments that are not situated within areas of strategic significance.

2.3.13 The strategic significance and corresponding scores are as follows:

- High (1.15) - Where the location has been identified within a local plan, strategy or policy as being ecologically important for the specific habitat type or where that habitat has been identified as being locally ecologically important;
- Medium (1.10) - Where there is no relevant plan, strategy or policy in place, professional judgement may be used to justify the use of the medium strategic significance category; and
- Low (1) - If the habitat is not included in local plans, strategy or policy.

Measurement of Habitats

2.3.14 Baseline and proposed habitat areas were measured as distinct habitat parcels. Baseline habitat parcels were measured using habitat mapping, aerial imagery and proposed plans overlain in AutoCAD and GIS software.



2.4 Biodiversity Unit Calculation: Post-Development

- 2.4.1 The total number of biodiversity units of the Site post-development was calculated using the Proposed Habitats Map (Appendix III).
- 2.4.2 The area/length of retained and enhanced habitats, hedgerows and watercourses previously identified as part of the ecological baseline calculation was inputted into the 'Statutory Biodiversity Metric'. The area/length of all newly created habitats was also inputted into the 'Statutory Biodiversity Metric'. The area/length of retained, enhanced and created habitat, hedgerow and watercourse habitats are defined as the following:
- Retention: there is no loss of the habitat, hedgerow or watercourse and/or the habitat, hedgerow or watercourse is retained in its baseline condition;
 - Enhancement: the habitat, hedgerow or watercourse is retained and there is an improvement in condition compared to the baseline state, or a change to a higher distinctiveness habitat within the same broad habitat group compared to the baseline state; and
 - Creation: the loss of a habitat, hedgerow or watercourse and replacement with another, and/or a change in the broad habitat, hedgerow or watercourse type.
- 2.4.3 The total number of biodiversity units generated by the Site post-development was calculated in a similar way to calculating the ecological baseline. However, in addition to considering the area, distinctiveness, condition and strategic significance of each habitat, the key risks to delivering successful habitat creation, enhancement and creation initiatives were also taken into consideration through the application of various risk multipliers. The 'Statutory Biodiversity Metric' applies three risk multipliers. These are to account for the time taken for created or enhanced habitats to reach target condition (temporal risk multiplier); the distance between the Site and the location in which the compensation is being delivered (spatial risk multiplier: only applied if delivering habitat creation initiatives outside the Site), and how difficult the habitat creation and/or enhancement initiative is to deliver (difficulty risk multiplier). These various risk multipliers were automatically generated by the 'Statutory Biodiversity Metric'.

2.5 Limitations

- 2.5.1 The total number of biodiversity units generated by the Site pre-development has been informed by data collected as part of the extended phase 1 habitat survey, habitat condition assessment and desktop study (including a review of aerial imagery datasets). However, the ecological value of the Site post-development has been informed by the design information that was available at the time (see paragraph 1.6.1 above). As such, the assessment is based on a number of important assumptions. This report aims to make any such assumptions explicit so that they can be reviewed or updated as appropriate. Given the various sources of information used and assessment/measurement tools used to inform these calculations, it is possible that minor discrepancies exist, particularly between the size and length of the baseline habitats and post-development habitats. However, any discrepancies present are not anticipated to significantly influence the outcome of the various calculations and the overall BNG Feasibility Assessment.
- 2.5.2 In addition to aiming to achieve BNG within developments, developers must implement avoidance, mitigation, compensation and/or enhancement measures required to prevent harm to legally protected species (such as nesting birds). Achieving BNG does not override the legal protection of these species and their habitats. Further information about avoidance, mitigation, compensation and/or enhancement measures required, are included in the PEA report ref: 6671E/25 (PJC Consultancy, 2025).



3 BIODIVERSITY UNIT CALCULATION: PRE-DEVELOPMENT (BASELINE)

3.1 Irreplaceable Habitats

- 3.1.1 No irreplaceable habitat types were recorded within the Site as part of the ecological walkover survey and desk study.

3.2 Habitats

- 3.2.1 The habitat types recorded within the Site and associated units generated pre-development (ecological baseline) is presented in Table 3 below. Overall, pre-development, a total of 0.47 habitat units are generated on-site. A map displaying the type and distribution of habitats on-site is also presented in Appendix III.

3.3 Hedgerows

- 3.3.1 The hedgerow types recorded within the Site and associated units generated pre-development (ecological baseline) is presented in Table 4 below. Overall, pre-development the Site generated a total of 0.03 hedgerow units. A map displaying the type and distribution of hedgerows on-site is also presented in Appendix III.

3.4 Watercourses

- 3.4.1 No watercourses were recorded within the Site as part of the ecological walkover survey and habitat condition assessment.

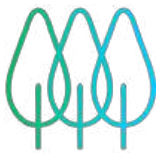


Table 3: On-site habitats pre-development.

Habitat ID	Habitat Type	Area (ha)	Distinctiveness	Condition	Strategic Significance	Total Habitat Units	Baseline Units Retained	Baseline Units Enhanced	Habitat Units Lost
1	Developed land; sealed surface	0.023	Very Low (0)	N/A (0)	Low (1)	0.00	0.00	0.00	0.00
2	Bare ground	0.018	Low (2)	Poor (1)	Low (1)	0.04	0.00	0.00	0.04
3	Urban trees	0.0326	Medium (4)	Good (3)	Medium (1.1)	0.43	0.22	0.00	0.22
TOTAL						0.47	0.22	0.00	0.25

Table 4: On-site hedgerows pre-development.

Habitat ID	Hedgerow Type	Length (km)	Distinctiveness	Condition	Strategic Significance	Total Hedgerow Units	Baseline Units Retained	Baseline Units Enhanced	Hedgerow Units Lost
1	Non-native ornamental hedgerow	0.026	V. Low (1)	Poor (1)	Low (1)	0.03	0.00	0.00	0.03
TOTAL						0.03	0.00	0.00	0.03



4 BIODIVERSITY UNIT CALCULATION: POST-DEVELOPMENT

4.1.1 Assumptions have been made regarding the type and targeted condition of habitats that are proposed to be created and enhanced. These assumptions include:

- Retention of a medium urban tree (T7) within the Site;
- Creation of 0.0046ha of introduced shrub;
- Creation of 0.0071ha of green roof;
- Planting of a small native tree.

4.2 Habitats

4.2.1 Post-development, habitat retention measures are anticipated to generate 0.22 habitat units (see Table 3) and habitat creation measures are anticipated to generate approximately 0.04 habitat units (see Table 5 below). A map displaying the extent of the habitat units expected to be created on-Site post-development, can be seen in Appendix IV.

4.3 Hedgerows

4.3.1 No hedgerow habitats are proposed to be incorporated into the proposed development.

4.4 Watercourses

4.4.1 No watercourse habitats are proposed to be incorporated into the proposed development.



Table 5: Habitats created post-development.

Habitat Type	Area (ha)	Distinctiveness	Targeted Condition	Strategic Significance	Habitat Units Delivered
Developed land; sealed surface	0.0062	Very Low (0)	N/A (0)	Low (1)	0.00
Introduced shrub	0.0046	Low (2)	N/A (1)	Low (1)	0.01
Other green roof	0.0071	Low (2)	N/A (1)	Low (1)	0.01
Urban tree	0.0041	Medium (4)	Moderate (2)	Medium (1.1)	0.01
TOTAL					0.03



5 CONCLUSION

- 5.1.1 Pre-development, the Site generates a total number of 0.47 habitat units and 0.03 hedgerow units.
- 5.1.2 Post-development, the Site is anticipated to generate approximately 0.25 habitat units and 0.00 hedgerow units through a combination of habitat retention and creation measures.
- 5.1.3 This represents a net-loss of -0.21 habitat units and -0.03 hedgerow units which equates to a net % change of -46.06% habitat units and -100.00% hedgerow units.
- 5.1.4 The overall net loss equates to a unit deficit of 0.26 habitat units and 0.03 hedgerow units (or 0.52 Tier A1 and 0.06 Tier H statutory government credits).
- 5.1.5 In addition, the trading rules, in particular *'Rule 1: The trading rules of this biodiversity metric must be followed. 'Trading down' must be avoided. Losses of habitat are to be compensated for on a "like for like" or "like for better" basis. New or restored habitats should aim to achieve a higher distinctiveness and/or condition than those lost.'*, have not been satisfied post-development.
- 5.1.6 Therefore, based on current detailed design information, the proposed development is not anticipated to deliver the minimum 10% BNG.

6 NEXT STEPS

- 6.1.1 Given the spatial constraints of the Site, achieving BNG targets through on-site habitat creation and enhancement measures is considered unrealistic.
- 6.1.2 BNG targets should therefore be met through off-site habitat creation and enhancement measures, for example by purchasing the relevant number of off-site units from a land manager / habitat bank provider. If the applicant chooses to purchase off-site units, they will need to explore the marketplace to find what is available to buy in order to meet your specific BNG requirements.
- 6.1.3 The land manager / habitat bank provider you buy from will need to register the gain site on the national biodiversity gain sites register before, at the same time as, or after you buy units on it. Sites on the register may be allocated to specific development projects to help them achieve their biodiversity gain target.
- 6.1.4 Any off-site gains will then need to be secured via a legal agreement (for example a S106 agreement or conservation covenant) which will set out who will do the BNG creation, enhancement and management work for 30 years (usually the land manager / habitat bank provider).
- 6.1.5 Once you have found and agreed a contract with a land manager / habitat bank provider, either the land manager or applicant / developer (with the land manager's permission) must apply to record the allocation of the biodiversity units to your development on the biodiversity gain sites register. The allocation of any off-site biodiversity gains to your development will need to be recorded before the local planning authority can approve your biodiversity gain plan.
- 6.1.6 A Biodiversity Gain Plan can then be prepared and submitted to the local planning authority if the applicant / developer can meet their BNG requirements with off-site gains, and once the applicant / developer have recorded the allocation of any off-site biodiversity gains on the national biodiversity gain sites register.
- 6.1.7 If developers cannot achieve on-site or off-site BNG, they must buy statutory biodiversity credits from the government. This should be a last resort.



7 REFERENCES

CIEEM, CIRIA, IEMA (2019). Biodiversity Net Gain: Good practice principles for development [PDF] Available from: <https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development/>

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8 APPENDICES

Appendix I: Site Location Plan



LEGEND:

Site Boundary

STATUS:

FOR INFORMATION ONLY

Sussex Office: Rocks Yard, Victoria Rd, Herstmonceux, Hailsham, BN27 4TQ.
TN26 1AE
T: 01323 832120.

Kent Office: The Watermill, The Mill Business Park, Maidstone Road, Ashford,
TN25 1AE
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W: <https://www.pjcoconsultancy.com>

CLIENT:

Robblewood Projects Ltd

PROJECT:

57 The Broadway
Haywards Heath
RH16 3AS

TITLE:

Appendix I: Site Location Plan

SCALE AT A4:
1:711.5

DRAWN:
DB

APPROVED:
NC

PROJECTION:
EPSG:27700

DATE:
11/04/26

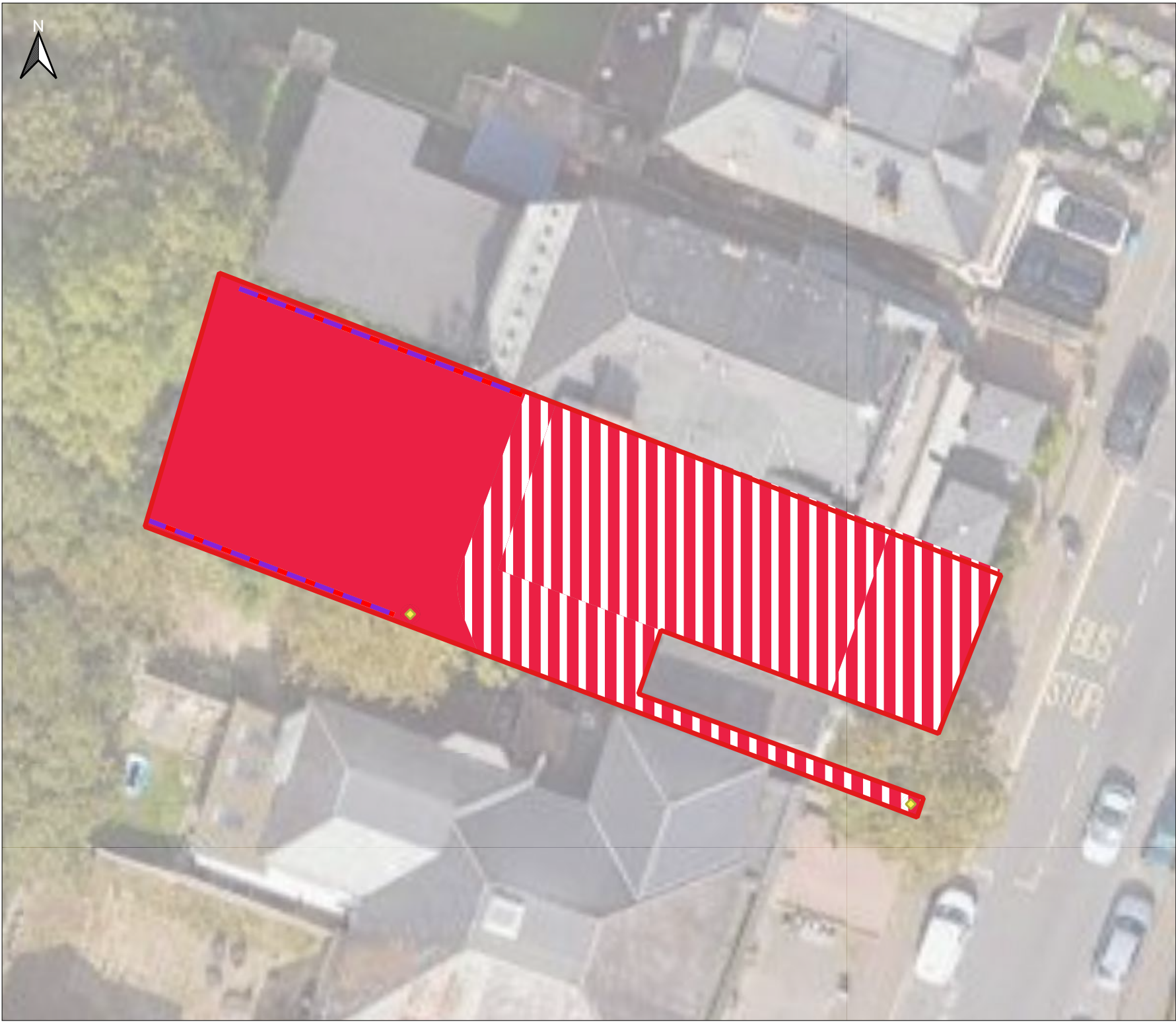
DATE:
15/04/26

DRAWING No:

PJC/6916E/26/A1/V1



Appendix II: Baseline Habitat Map



LEGEND: Site Boundary Existing Medium Urban Tree Non-native and ornamental hedgerow Developed land; sealed surface Bare ground		
STATUS: FOR INFORMATION ONLY		
PJC Sussex Office: Rocks Yard, Victoria Rd, Herstmonceux, Hailsham, BN27 4TQ. TN26 1AE T: 01323 832120. Kent Office: The Watermill, The Mill Business Park, Maidstone Road, Ashford, T: 01233 225365 E: contact@pjcconsultancy.com W: https://www.pjcconsultancy.com		
CLIENT: Robblewood Projects Ltd		
PROJECT: 57 The Broadway Haywards Heath RH16 3AS		
TITLE: Appendix II: Baseline Habitat Map		
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PROJECTION: EPSG:27700	DATE: 11/04/26	DATE: 15/04/26
DRAWING No: PJC/6916E/26/A2/V1		



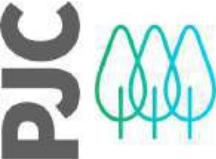
Appendix III: Proposed Habitat Map



LEGEND:

-  Site Boundary
-  Proposed Small Urban Tree
-  Retained Medium Urban Tree
-  Lost Medium Urban Tree
-  Developed land; sealed surface
-  Other green roof
-  Introduced shrub

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PROJECT: 57 The Broadway
Haywards Heath
RH16 3AS

TITLE: Appendix III: Proposed Habitats Map

SCALE AT A4: 1:225.8	DRAWN: DB	APPROVED: NC
PROJECTION: EPSG:27700	DATE: 11/04/26	DATE: 15/04/26

DRAWING No: PJC/6916E/26/A3/V1



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