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BIODIVERSITY NET GAIN PLAN **Land east of College Lane, Hurstpierpoint**

September 2026

BMD.22.0022.RPE.IA.005.RevA Biodiversity Net Gain Plan

DOCUMENT HISTORY

Project Number: 22.0022		Document Reference: BMD.22.0022.RPE.IA.005.RevA Biodiversity Net Gain Plan			
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Declaration of compliance with professional code of ethics or conduct

The information which we have prepared and provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bonafide opinions.

All reasonable efforts have been made to comply with current legislation and best practice, including BS 42020:2013, the Environment Act 2021 (Schedule 7A: Biodiversity Gain), the National Planning Policy Framework (2026), CIEEM EclA Guidelines (2018, updated 2025), and relevant Natural England guidance.

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EXECUTIVE SUMMARY

CLIENT	Thakeham Homes Limited
CONSULTANT	Bradley Murphy Design Ltd.

SITE

Location.....	Land east of College Lane, Hurstpierpoint, West Sussex.
National Grid Reference...	Approx. Centre: TQ 29212 16026.
Overview	The Site comprises approximately 5.4 ha of grazed fields, associated plantation woodland, pond, treelines and associated ditches. The Site is situated in the urban outskirts of the village of Hurstpierpoint and Hassocks and to the south of the village of Hurst Wickham in the county of West Sussex. Burgess Hill town centre lies approximately 3.5 km northeast of the Site.
Landscape context	The site is situated on the outskirts of the village of Hurstpierpoint, West Sussex. The site can be found on the eastern fringes of the village, between College Lane and Belmont Lane. The immediate surroundings consist of development to the immediate south and west and pasture/arable to the north and east.

DEVELOPMENT & PLANNING BACKGROUND

Proposed works.....	Erection of 100 dwellings, with associated access, car parking, refuse/recycling storage, landscaping, infrastructure and works
Planning stage.....	Full Planning Application.

ECOLOGICAL BACKGROUND

General.....	An Ecological Assessment of the Site was undertaken by BMD in August 2022, which informed the scope of subsequent Phase 2 surveys. Updated Phase 2 survey work and an ecological verification walkover have since been undertaken to inform the current Full Planning Application. Full details can be found within 22.0022.RPE.TN.001. Ecological Verification & 22.0022.RPE – P2.002. Eco Assessment.
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ASSESSMENT

Objectives.....	To provide baseline data pertaining to potential biodiversity net gain as a result of the current development proposals for the Site.
Approach	Quantitative Biodiversity Net Gain Assessment using The Statutory Biodiversity Metric.
Date.....	Baseline undertaken in February 2026. Post development undertaken in September 2026.

RESULTS & CONCLUSIONS

Quantitative (predicted Biodiversity Net Gain).....	As demonstrated, a positive change of 2.89 habitat biodiversity units (15.98%) is anticipated based on the current designs for the Proposed Scheme. The outcome results also indicate a predicted positive change in hedgerow units of 1.44 (59.02%).
Qualitative	In addition to this quantitative assessment a number of qualitative gains are also considered to be achievable.

RECOMMENDATIONS

Opportunities for enhancement include planting native and wildlife friendly species within any soft landscaping and bird and bat boxes within the buildings.
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1. INTRODUCTION

1.1 Background Information

1.1.1 Bradley Murphy Design Ltd. (BMD) was commissioned by Thakeham Homes Limited in February 2026 to undertake an Ecological Assessment of their site: Land east of College Lane, Hurstpierpoint hereafter referred to as 'the Site'. The Site is approximately centred on national grid reference: TQ 29212 16026. A plan depicting the Site's location is provided in the Appendices.

1.1.2 The following assessments were completed in September 2026:

- A quantitative assessment of predicted biodiversity net gain post-development compared with a 'no development' situation using a biodiversity impact matrix has been completed (current document); and,
- A qualitative assessment of net gain associated with new habitat creation and provision of other enhancements such as species features.

1.1.3 This report accompanies and presents the results of the biodiversity impact calculation (provided in the Appendices) undertaken at the Site to demonstrate net gain of biodiversity as a result of the proposals, hereafter referred to as the 'Site'.

1.2 Proposed Development

1.2.1 Erection of 100 dwellings, with associated access, car parking, refuse/recycling storage, landscaping, infrastructure and works

1.3 Site Context

Historic Context

1.3.1 A review of readily available historical maps and aerial imagery indicate that the Site's location formed part of an agricultural complex comprising two field parcels and associated marginal features such as treelines and hedgerows from at least the late 18th century onwards. The eastern boundary of the Site consisted of a treeline adjacent Belmont Lane within the late 18th century, this area was subject to new woodland planting and scrubland within 2015 which extended the treeline further into the Site. The northwest/northeast hedgerow and onsite waterbodies, sourced from a tributary of Herring Stream at the northern boundary of the Site, appear to have been present in the landscape since at least the late 18th century.

1.3.2 With regard to the local context change throughout the centuries, the residential block connected to College Lane adjacent the west of the Site was originally arable land within the 18th century until the mid-19th century. At this time period this area alongside adjacent blocks to the south of the Site became part of a residential development that transformed the majority of the land to built form.

1.3.3 Further urban expansion has occurred within the surrounding areas within the 19th century, in particular the expansions of the village of Hurstpierpoint and Hassocks has led to many

residential blocks being constructed to the south, west and east of the greater landscape near to the Site. Aside from boundary features, the main habitats within the Site, as well as the dominant landscape features within the vicinity of the Site – dominant agricultural field complexes and scattered woodland blocks primarily to the south – have changed little in composition of the last 100 years.

Present Context

- 1.3.4 The Site is an approximately 5.40 ha parcel of land comprising of a large grazed field, scrub and plantation woodland, pond, a dry ditch and peripheral hedgerows and trees. The elevation above sea level on the Site approximately ranges from 40-70 m.
- 1.3.5 An area of scrub and new woodland planting was established in approximately 2015 along the eastern boundary of the Site.
- 1.3.6 The Site is situated in the urban outskirts of the village of Hurstpierpoint and Hassocks and to the south of the village of Hurst Wickham in the county of West Sussex. Burgess Hill town centre lies approximately 3.5 km north east of the Site. The urbanised areas, including residential developments, industrial complexes, and transport infrastructure associated with Burgess Hill and its suburban fringe, are present to the north east of the Site. This landscape sits in juxtaposition to the south of the Site which is dominated by agricultural fields (chiefly arable, but with significant tracts of land set to pasture). Thus, it is considered that the Site occupies a rural-urban transitional zone that defines its local ecology.
- 1.3.7 A dry ditch is present in the northern boundary of the Site which in areas culminate into two separate historic pond features on Site. There are further waterbodies and watercourses which continue into the wider landscape particularly to the east of the Site.
- 1.3.8 Considering the outlined above contextual features regarding the Site and its surrounding landscape, while there is some overland connectivity of the Site to its adjacent habitats, particularly to the east and south, the presence of numerous significant dispersal barriers within the vicinity, including roadways and rail lines, is deemed to leave dispersal capacity of terrestrial fauna to/from the Site relatively moderate. Aquatic and semi-aquatic species may potentially have access to onsite habitats via the watercourse corridor along the north of the Site and associated off site waterbodies. It is further estimated that more mobile, flying species, such as bats, birds, and insects, would be more readily able to commute to the Site from surrounding habitats.

1.4 Ecological Context

- 1.4.1 A preliminary ecological assessment of the Site was undertaken by BMD in October 2022, including an initial assessment of structures and trees relating to roosting bats. Full results are detailed within BMD.22.0022.RPE-P1.801.-.Ecology. This assessment then informed further species surveys conducted in April-June 2023 and June – October 2025 including:
- Great crested newt HSI assessment and eDNA sampling (April 2023 & June 2025); and
 - Reptile surveys (May/June 2023 & September/October 2025).

- 1.4.2 Full results of species surveys are detailed within the Phase 2 Ecological Assessments of the Site (see BMD.22.0022.RPE-P2.804. Eco Assessment & BMD.22.0022.RPE-P2.002. Eco Assessment).
- 1.4.3 A verification of the original preliminary ecological assessment of the Site was undertaken by BMD in February 2026 to verify the previous condition of the Site. Full results are detailed within BMD.22.0022.RPE.TN.001. Ecological Verification.
- 1.4.4 A Topography survey of the Site was also conducted, results of which are detailed within 81023BWLS-01_08 Rev A.

2. BIODIVERSITY NET GAIN

2.1 Biodiversity Net Gain

2.1.1 Biodiversity Net Gain is defined as:

“Development that leaves biodiversity in a better state than before, and an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation”. (Baker et al., 2019)

2.1.2 Previously, various percentage targets are used across the country and in schemes such as BREEAM, it is noted that there is no consistent agreed target percentage gain at either national or local level. However, as of November 2021, The Environment Act 2021 states under Schedule 14 that provision are to be made *“for biodiversity gain to be a condition of planning permission in England.”* (HM Government 2021). A minimum 10% net gain is now mandatory (as of February 2024).

2.1.3 In England, biodiversity net gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

2.1.4 Developers must deliver a biodiversity net gain of 10%. This means a development will result in more or better quality natural habitat than there was before development.

2.2 National Planning Policy Framework 2026 (NPPF)

2.2.1 The NPPF places strong emphasis on achieving net gain in all developments (not just ‘no net loss’) through the planning system’s purpose of achieving sustainable development (HM Government 2026). The NPPF notes three overarching objectives to achieve sustainable development and opportunities to be taken to secure net gain in each. The environmental objective relates to biodiversity:

- *“to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution.”* (NPPF Paragraph 17, HM Government 2026).

2.2.2 The following objectives and policies are of particular relevance to the Development of the Site and are set out in Chapter 19 of the NPPF, ‘Conserving and Enhancing the Natural Environment’:

- N1: Identifying environmental opportunities and safeguards: *“Development plans should safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by using Local Nature Recovery Strategies, Protected Landscape Management Plans, River Basin Management Plans, National Forest Strategies, Community Forest Plans and other relevant evidence at the most appropriate level...”*;
- N2: Improving the natural environment: *“To contribute positively to the natural environment, and support nature’s recovery...”*;

- N3: Trees in development: *“In recognition of the benefits which trees can provide for biodiversity, climate change mitigation and adaptation, and the character and quality of the built environment...”*; and,
- N6: Areas of particular importance for biodiversity and geodiversity: *“To support the conservation of important habitats, species and sites of geodiversity value...”*.

2.2.3 The Proposed Development has therefore been assessed with regard to the NPPF requirement to minimise ecological impacts, protect and enhance retained habitats, secure measurable biodiversity net gain, and incorporate biodiversity improvements within the design and long-term management of the Site. This assessment should be read alongside the accompanying Ecological Impact Assessment, Statutory Biodiversity Metric and habitat plans.

2.3 Biodiversity Net Gain Good Practice

2.3.1 In 2016 (Baker, 2016) a set of Good Practice Biodiversity Net Gain Principles were defined and underpin the current best practice guidance for development (Baker *et al.*, 2019). These principles are:

- Principle 1: Apply the mitigation hierarchy;
- Principle 2: Avoid losing biodiversity that cannot be offset elsewhere;
- Principle 3: Be inclusive and equitable;
- Principle 4: Address risk;
- Principle 5: Make a measurable net gain contribution;
- Principle 6: Achieve the best outcomes for biodiversity;
- Principle 7: Be additional;
- Principle 8: Create a net gain legacy;
- Principle 9: Optimise sustainability; and
- Principle 10: Be transparent.

3. APPROACH

3.1 Overview

- 3.1.1 This assessment is being completed in accordance with the Good Practice Biodiversity Net Gain Principles set out in Section 4.
- 3.1.2 Details of the approach used to determine the baseline biodiversity conditions at the Site and predicted biodiversity net gain of the Site are documented below.
- 3.1.3 The Site was subject to a habitat survey during February 2026. This included a review of the current condition of the habitats on Site.
- 3.1.4 This BNG assessment uses the Statutory Biodiversity Metric as required under the statutory BNG framework. Protected and notable species are considered separately through the EcIA and associated mitigation strategy.

3.2 Biodiversity Net Gain

- 3.2.1 The quantitative assessment for this biodiversity gain plan uses the Statutory Biodiversity Metric to provide a transparent and replicable numeric value of biodiversity before and after enhancement. The metric only considers habitats and does not take protected and notable species into account.
- 3.2.2 The values take a number of habitat attributes into consideration, these are displayed below within Table 3.1. These habitat attributes are either pre-populated by the Statutory Biodiversity Metric parameters or determined by information available on the pre-development baseline habitats or the post-development predicted habitats and professional judgement.

Table 3.1 The Statutory Biodiversity Metric habitat attributes and pre-populated status

Habitat Attribute	Pre-populated Status
Area or length	Determined by available information and professional judgement
Distinctiveness	Distinctiveness is a measure based on the type of habitat and its distinguishing features. Professional survey is required to determine habitat type. The biodiversity metric tool automatically assigns distinctiveness category to selected habitats.
Condition	Determined by available information and professional judgement using the metric condition assessments
Strategic significance	Determined by available information and professional judgement
Time to target condition	Determined by metric parameters
Difficulty to create/restore	Determined by metric parameters

- 3.2.3 An overview of the Statutory Biodiversity Metric principles, rules and key components are described in the following sections.

3.3 Area Habitats, Linear Features & Point Features

- 3.3.1 Area habitats such as 'modified grassland' are measured in hectares within the Statutory Biodiversity Metric, while linear features such as 'Native hedgerow' are measured in metres. The only point features included in the metric are trees, e.g. 'Urban tree', these are measured in hectares based on their tree canopy, calculated using the 'Tree helper' tool of the Statutory Biodiversity Metric.
- 3.3.2 Linear features are divided into 'Hedgerows' and 'Watercourses' and are dealt with separately in the metric. Hedgerows are included within this BNG assessment for the Site.
- 3.3.3 The area of a watercourse may be recorded in the area module as the category 'watercourse footprint'. There are no biodiversity units associated with this category and all biodiversity units generated by watercourses are reported within the watercourse tab.
- 3.3.4 Point features such as 'Urban tree' are allocated size categories which are then summed and calculated as a canopy area in hectares. Table 3.2 displays these size classes and area equivalents below, further information can be found within the Statutory Biodiversity Metric User Guide (Department for Environment, Food and Rural Affairs, 2025). The biodiversity metric uses set values to represent the area of trees depending on their diameter at breast height. This value is a representation of canopy biomass, and is based on the root protection area formula, derived from BS 5837:2012. The metric will:
- Account for each individual tree within a group or block of trees;
 - Record the habitat underneath the tree canopy separately;
 - Not reduce any area generated by the tree helper;
 - Not deduct the area of individual trees from other habitats; and
 - Make clear in the user comments how many trees contribute towards the total area.
- 3.3.5 'Individual tree' area is not added onto the total site area, as these point features are treated as a secondary layer that sits above the total site area on the ground. However, the biodiversity value provided by the 'Individual tree' area is added onto the total site biodiversity value.

Table 3.2 Tree size classes and area equivalents (DEFRA, 2025)

Size	Diameter at Breast Height (cm)	Metric area Equivalent (ha)
Small	7-30	0.0041
Medium	31-60	0.0163
Large	60-90	0.0366
Very large	90	0.0765

- 3.3.6 Habitat distinctiveness is allocated as one of five possible categories, these categories are automated within the Statutory Biodiversity Metric. Table 3.3 below displays the distinctiveness categories, scores and criteria, further information can be found within the Statutory Biodiversity Metric User Guide (Department for Environment, Food and Rural Affairs, 2025).

Table 3.3 The Statutory Biodiversity Metric distinctiveness categories, scores and criteria (DEFRA 2025).

Distinctiveness	Score	Criteria
Very High	8	<i>"Priority Habitats as defined in Section 41 of the Natural Environment and Rural Communities (NERC) Act that are highly threatened, internationally scarce and require conservation action. Small amount of remaining habitat with a high proportion unprotected by designation. Endangered or Critical European red list habitats."</i>
High	6	<i>"Priority Habitats as defined in Section 41 of the NERC Act requiring conservation action. Remaining Priority Habitats not in very high distinctiveness band & other red list habitats."</i>
Medium	4	<i>"Semi-natural habitats not classed as a Priority Habitat but with significant wildlife benefit e.g., mixed scrub. One Priority Habitat (arable field margins)."</i>
Low	2	<i>"Habitat of low biodiversity value e.g. temporary grass and clover ley. Agricultural and Urban land of lower biodiversity value."</i>
Very Low (hedgerow)	1	<i>"Little or no biodiversity value."</i>
Very Low (area & watercourse)	0	<i>"Little or no biodiversity value."</i>

3.4 Habitat Condition

- 3.4.1 Habitat condition is allocated as one of seven possible categories. These categories are determined by information available on the pre-development baseline habitats or the post-development predicted habitats. Professional judgement is used to interpret the information available and applied when using the habitat condition assessment sheets when assessing whether a habitat meets or fails condition criteria set out by the Statutory Biodiversity Metric.
- 3.4.2 These condition criteria are specific to each habitat type, further information can be found within the Statutory Biodiversity Metric User Guide and accompanying condition sheets (Department for Environment, Food and Rural Affairs, 2025). Where the same habitat types occur within the Site but have different condition categories, they have been assessed separately within the metric. Table 3.4 below displays the condition categories and scores.

Table 3.4 The Statutory Biodiversity Metric condition categories and scores (DEFRA, 2025)

Condition	Score
Good	3
Fairly Good	2.5
Moderate	2
Fairly Poor	1.5
Poor	1
Condition Assessment N/A	1
N/A - Other	0

3.5 Irreplaceable Habitats & Very High Distinctiveness Habitats

- 3.5.1 Irreplaceable habitats are defined as:
- "Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen." (NPPF, 2026)

- 3.5.2 Due to the nature of irreplaceable habitats, their biodiversity value cannot be quantified and therefore these habitats are dealt with separately within the Statutory Biodiversity Metric. Irreplaceable habitats (as provided for in secondary legislation for BNG) do not have a BNG requirement as they are too valuable to be compensated for. As such, any losses to irreplaceable habitats cannot be calculated by the biodiversity metric tool and they are removed from the baseline. An inventory of these habitats is compiled within the 'Irreplaceable Habitats' tab of the metric, where bespoke compensation agreed with the relevant consenting body is detailed. However, it should be noted that any impact on an irreplaceable habitat is strongly advised against, as bespoke compensation will only be agreed upon in exceptional circumstances.
- 3.5.3 Very high distinctiveness habitats (VHDH) are defined as:
- "VHDH are highly threatened, internationally scarce habitats which require conservation action. Impacts to these habitats should be avoided in line with planning policy." (DEFRA, 2025).
 - These habitats were described in further detail within the previous BNG guidance and include:
 - "Priority Habitats as defined in Section 41 of the Natural Environment and Rural Communities (NERC) Act that are highly threatened, internationally scarce and require conservation action, for example blanket bog.
 - Small amount of remaining habitat with a high proportion unprotected by designation.
 - Critically Endangered European Red List habitats." (Panks et al. 2023c).
- 3.5.4 Similarly to irreplaceable habitats, the very high distinctiveness nature of these habitats is difficult to quantify and therefore these habitats also require bespoke compensation within the Statutory Biodiversity Metric. VHDH are included within the main 'Baseline, Enhancement & Creation' tabs of the metric. Impact on or creation of these habitats will require comprehensive compensation or justification to satisfy the relevant consenting body.
- 3.5.5 Refer to The Biodiversity Metric 4.0 User Guide – Technical Annex 2 (Panks *et al.* 2023c) for a full list of VHDH.

3.6 Metric Principles & Rules

- 3.6.1 The Statutory Biodiversity Metric may be used to carry out assessments of biodiversity net gain and inform plans and decision making if the metric principles and rules are adhered to. Table 3.5 below lists the principles and rules of the Statutory Biodiversity Metric. Further details of these principles and rules can be found within the Statutory Biodiversity Metric User Guide (DEFRA, 2025).

Table 3.5 The Statutory Biodiversity Metric principles and rules (DEFRA, 2025)

Principles	
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 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	"The metric does not enforce a minimum habitat size ratio for compensation of losses. However, 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."
Rules	
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 biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met."
4	"In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority."

3.7 Pre-development baseline habitats

- 3.7.1 The baseline habitat data from which net biodiversity change is calculated using the UKHab Habitat Survey completed by BMD in February 2026 (BMD.22.0022.DRE.001) and is provided in the Appendices: Plans. The UKHab Habitat Classification Survey was conducted by BMD to industry standard at the time (UKHab, 2023).

3.8 Predicted post-development habitat

- 3.8.1 The Statutory Biodiversity Metric requires the following information to inform the predicted post-development habitats:
- Habitat type;

- Habitat area or length;
- Habitat condition;
- Irreplaceable habitat; and
- Strategic significance.

3.8.2 Plans depicting the post-enhancement retained, enhanced and created habitats of the Site are provided in the Appendices. These include the Landscape Strategy (ref: 3481-5-2-DR-0001-P5) and Post Development Plan (Ref: BMD.22.0022.DRE.002 P5).

3.9 Methodology for drawing and measuring

3.9.1 Pre-development and post-development data has been imported to GIS software (ArcGIS Desktop 10.8 & ArcGIS Pro 3.1) to enable a direct comparison between each scenario and an accurate, replicable method of measuring. Measurements taken from the GIS have been input into the assumptions table and then into the Statutory Biodiversity Metric calculation tool that has been used for this assessment.

3.9.2 The full completed Statutory Biodiversity Metric Calculation Tool with supporting assessor comments is appended to this technical note.

3.10 Auditing biodiversity net gain as the development progresses

3.10.1 The specifics of the use of the Statutory Biodiversity Metric in auditing biodiversity net gain achievements, as the development progresses, is currently under refinement and will be developed further as part of the secondary legislation required for implementation of the Environment Act 2021.

3.10.2 The predicted post-development baseline will be calculated from the following data;

- Plans provided in the Appendices.
- Detailed plans, drawings, documents and specifications submitted for planning.
- Construction issue plans, drawings, and specifications (if available).
- As built information (if available).

4. APPLICATION OF GOOD PRACTICE BIODIVERSITY NET GAIN PRINCIPLES

- 4.1.1 Throughout the progression and implementation of the Scheme, the Good Practice Biodiversity Net Gain Principles have been applied.
- 4.1.2 Table 4.1 demonstrates how each principle, listed in Section 2, has been applied since the Ecological Assessment completed in 2025 and will be applied going forward.

Table 4.1 Application of the Good Practice Biodiversity Net Gain Principles

Principle	Application of the principles
Principle 1: Apply the mitigation hierarchy	High value habitats such as hedgerows, have been designed into the scheme to be retained where feasible. There is some loss of low value habitats, however these losses have been compensated accordingly.
Principle 2: Avoid losing biodiversity that cannot be offset elsewhere	No irreplaceable habitats will be affected by the development.
Principle 3: Be inclusive and equitable	The Scheme will deliver Biodiversity Net Gain within the locality where biodiversity losses occur.
Principle 4: Address risk	The proposed auditing approach allows for risk to be assessed at appropriate intervals to ensure, as a minimum, the proposed future net gain will be achieved by the end of the development build-out period. Habitat creation risks are provided in the detail of the metric by default.
Principle 5: Make a measurable net gain contribution	Both quantitative and qualitative measures have been put in place to ensure that net gain is measurable. These are documented in this current report.
Principle 6: Achieve the best outcomes for biodiversity	A robust biodiversity baseline was completed in 2026 following best practice guidelines. This has allowed informed decisions to be made in relation to incorporating biodiversity into the most recent development proposals. The most recent baseline conditions have informed detailed soft landscape design and composition that is appropriate for the local conditions.
Principle 7: Be additional	The newly created habitats will be reflective of the wider landscape and will provide higher value habitat in a previously low value/built up area.
Principle 8: Create a net gain legacy	The designs of the Scheme illustrate the landscape areas to be implemented within the Scheme which will be subject to ongoing management. This will help ensure a net gain legacy is achieved.
Principle 9: Optimise sustainability	By increasing floral diversity and retaining existing trees, the newly enhanced habitats will contribute to ecological resilience, support local biodiversity, and improve the Site's overall sustainability. These measures align with Biodiversity Net Gain principles and ensure that sustainability is integrated into the long-term management of the Site.
Principle 10: Be transparent.	The detailed results of the Biodiversity Net Gain assessment are provided with this report.

5. APPLICATION OF PROFESSIONAL JUDGEMENT

5.1 Pre-Development Habitats

- 5.1.1 Table 5.1 below summarises the professional judgements made in relation to the baseline condition of habitats pre-development based on the available survey and data. Where information is lacking or not detailed enough, judgements are made based on standard default conditions for typical habitat types.
- 5.1.2 Please note detailed results of the pre-development habitats including photographic evidence is provided in BMD.22.0022.RPE.TN.001.Ecological Verification & BMD.22.0022.RPE-P1.801.-.Ecology.

5.2 Post-Development Habitats

- 5.2.1 Table 5.2 below summarises the professional judgements made in relation to the predicted condition of created habitats. These judgements are based on the standard landscape types and aspirations for commensurate sites and are informed by a number of approved/verified.
- 5.2.2 No irreplaceable habitats were recorded within the baseline.
- 5.2.3 Should detailed landscape proposals differ significantly from those used in the current calculation, an updated biodiversity impact assessment will be required to ensure continued net gain of biodiversity.

5.3 Local Nature Recovery Strategy

West Sussex Local Nature Recovery Strategy (LNRS)

- Delivery of LNRS priorities within identified corridors and key landscape areas identified on the LNRS mapping as suitable for habitat expansion, connectivity and restoration.
 - These principles ensure that the BNG strategy is both policy-led and landscape-driven, rather than being applied as a residual mitigation exercise.
- 5.3.2 The following priorities are identified as being relevant to Site:
- Priority: W1.12 Manage existing and 'future' veteran and ancient trees to maintain good ecological condition and ensure continued habitat for the species they support.*
- 5.3.3 The only relevant LNRS priority relates to the retention and management of mature and veteran trees; however, as confirmed within the Arboricultural report (Ref: TGA. 2786.TreeSurveyRevA), no veteran trees are present within the Site. As such, no strategic significance was applied to trees onsite.
- 5.3.4 After review of the LNRS, no mapped habitats onsite justify strategic significance and as such this has not been applied.

Table 5.1 Justification of condition and strategic significance of pre-development baseline habitats for the Site

Habitat Type	Justification	Condition	Strategic Significance
Modified grassland	The majority of the Site consists of a single modified grassland field that is usually grazed by cattle.	Poor	Area/compensation not in local strategy/no local strategy
Artificial unvegetated; unsealed surface	There is an area of bare ground present nearby the entrance to the field within the northwest corner of the Site.	N/A	Area/compensation not in local strategy/no local strategy
Other woodland; broadleaved	One block of plantation broadleaved woodland lies along the eastern area of the Site.	Moderate	Area/compensation not in local strategy/no local strategy.
Individual Trees	Three large individual trees along the northern boundary of the Site.	Good	Area/compensation not in local strategy/no local strategy
Line of trees	There are lines of trees on the eastern and southern boundaries.	Moderate	Area/compensation not in local strategy/no local strategy
Line of trees – associated with bank or ditch	A line of trees associated with a ditch	Moderate	Area/compensation not in local strategy/no local strategy
Developed land; sealed surface	Hardstanding entrance to the field at the northwest corner of the Site.	N/A	Area/compensation not in local strategy/no local strategy.
Bramble scrub	Bramble scrub is present along the north and south of the Site.	N/A	Area/compensation not in local strategy/no local strategy.
Ponds	One pond is present within the northeast corner of the Site.	Moderate	Area/compensation not in local strategy/no local strategy.
Notes ¹ See the 'Assessor Comments' in the completed Statutory Metric with regard to the identification of these habitats.			

Table 5.2 Justification of condition and strategic significance of post-development created & retained habitats for the Site

Habitat Type	Justification	Condition	Strategic Significance
Proposed			
Hardstanding/Developed Land; Sealed Surface	Including areas of residential and associated roads and paths.	N/A	Area/compensation not in local strategy/no local strategy
Modified grassland	Areas of amenity grassland and flowering lawn.	Moderate	Area/compensation not in local strategy/no local strategy
Artificial unvegetated, unsealed surface	Artificial surfaces including footpaths and tracks within the Site and children's play space.	N/A	Area/compensation not in local strategy/no local strategy
Other neutral grassland	Wildflower grassland to be planted and managed for wildlife.	Moderate	Area/compensation not in local strategy/no local strategy
Non-priority ponds	Non-priority ponds within the Site.	Moderate	Area/compensation not in local strategy/no local strategy
Individual tree	178 small trees to be planted throughout the Site.	Moderate	Area/compensation not in local strategy/no local strategy
Vegetated garden	Private gardens within the developed areas of the Site.	N/A	Area/compensation not in local strategy/no local strategy
Mixed scrub	Mixed scrub creation within the Site.	Moderate	Area/compensation not in local strategy/no local strategy
Reedbeds	Reedbeds to be planted around the proposed ponds.	Moderate	Area/compensation not in local strategy/no local strategy

Habitat Type	Justification	Condition	Strategic Significance
Introduced shrub	Introduced shrub creation within the Site.	N/A	Area/compensation not in local strategy/no local strategy
Retained			
Line of trees	Line of trees within the Site.	Moderate	Area/compensation not in local strategy/no local strategy
Line of trees associated with bank or ditch	Line of trees with a ditch within the Site.	Moderate	Area/compensation not in local strategy/no local strategy
Other woodland; broadleaved	Broadleaved woodland onsite to be retained.	Moderate	Area/compensation not in local strategy/no local strategy
Bramble scrub	Bramble scrub within the Site to be retained.	N/A	Area/compensation not in local strategy/no local strategy
Individual Trees	Three large individual trees along the northern boundary of the Site to be retained.	Good	Area/compensation not in local strategy/no local strategy
Ponds	One pond present within the northeast corner of the Site to be retained.	Moderate	Area/compensation not in local strategy/no local strategy.
Notes ¹ See the 'Assessor Comments' in the completed Statutory Metric with regard to the identification of these habitats.			

6. RESULTS

6.1 Statutory Biodiversity Metric Results

- 6.1.1 The outcome of the biodiversity net gain assessment for area habitats is provided in Figure 6.1 and detailed in the supporting Statutory Biodiversity Metric.
- 6.1.2 As demonstrated, the Proposed Scheme is predicted to deliver a net gain in biodiversity when the on-site baseline value was calculated as 18.11 habitat units and 2.43 hedgerow units. Following development, on-site habitats are predicted to rise to 21.00 habitat units and 3.87 hedgerow units, representing a net on-site gain of 2.89 units (15.98%), and a gain in hedgerows of 1.44 units (59.02%) is achieved.
- 6.1.3 River units do not apply in this case. The northern ditch feature has been reviewed for inclusion within the watercourse module. These features are seasonally dry, support very limited aquatic/emergent vegetation and are assessed as minor drainage features rather than watercourses requiring watercourse-unit calculation. It is therefore addressed through the area/linear habitat assessment and retained habitat protection measures.

6.2 Metric Results

- 6.2.1 Results of the metric are summarised in table 6.1-6.4 below. A full copy of the Metric in Excel format will be supplied separately for detailed reference if required. Please note that some habitats within the baseline are retained.

Table 6.1 Statutory Biodiversity Metric calculations – habitat baseline

Habitat	Area (ha)	Distinctiveness	Condition	Total Habitat Units
Modified grassland	4.0451	Low	Poor	8.09
Artificial unvegetated, unsealed surface	0.0218	V.low	N/A - Other	0.00
Developed land, sealed surface	0.0038	V.low	N/A – Other	0.00
Rural tree	0.1099	Medium	Good	1.32
Other woodland; broadleaved	0.8249	Medium	Moderate	6.60
Bramble scrub	0.484	Medium	Condition assessment N/A	1.94
Ponds (non-priority habitat)	0.0204	Medium	Moderate	0.16
Total				18.11

Table 6.2 Statutory Biodiversity Metric calculations – habitat created and retained

Habitat	Area (ha)	Distinctiveness	Condition	Total Habitat Units
Proposed				
Other neutral grassland	0.5916	Medium	Moderate	3.96

Habitat	Area (ha)	Distinctiveness	Condition	Total Habitat Units
Modified grassland	0.2089	Low	Moderate	0.72
Mixed scrub	0.1792	Medium	Moderate	1.20
Ponds (non-priority habitat)	0.0544	Medium	Moderate	0.39
Developed land; sealed surface	1.3601	V.low	N/A – Other	0.00
Develop land; sealed surface (buildings)	0.5576	V.low	N/A – Other	0.00
Artificial unvegetated, unsealed surface	0.0155	V.low	N/A – Other	0.00
Vegetated garden	0.9471	Low	Condition assessment N/A	1.83
Introduced shrub	0.1437	Low	Condition assessment N/A	0.28
Reedbeds	0.1482	High	Moderate	0.93
Urban tree	0.7247	Medium	Moderate	2.22
Retained				
Rural tree	0.1099	Medium	Good	1.32
Bramble scrub	0.3485	Medium	Condition Assessment N/A	1.40
Other woodland; broadleaved	0.8249	Medium	Moderate	6.6
Ponds (non-priority)	0.0204	Medium	Moderate	0.16
Total				21.00

Table 6.3 Statutory Biodiversity Metric calculations – hedgerow habitat baseline

Habitat	Length (km)	Distinctiveness	Condition	Total Habitat Units
Line of trees	0.466	Low	Moderate	1.86
Line of trees – associated with bank or ditch	0.142	Low	Moderate	0.57
Total				2.43

Table 6.4 Statutory Biodiversity Metric calculations – hedgerow habitat creation, retained and enhanced

Habitat	Length (km)	Distinctiveness	Condition	Total Habitat Units
Retained				
Line of trees	0.466	Low	Moderate	1.86
Line of trees - associated with bank or ditch	0.142	Low	Moderate	0.57
Created				
Non-native ornamental hedgerow	0.981	Very low	Poor	0.95

Habitat	Length (km)	Distinctiveness	Condition	Total Habitat Units
Native hedgerow	0.146	Low	Moderate	0.49
Total				3.87

6.3 Trading Rules

- 6.3.1 Trading rules are satisfied through retention of medium distinctiveness woodland, scrub, pond and individual tree habitats, together with creation of medium/high distinctiveness habitats including other neutral grassland, mixed scrub, non-priority ponds, reedbeds and individual trees. The final position is confirmed within the Statutory Biodiversity Metric trading summary tabs.

Fig 6.1. Summary Biodiversity Net Gain Assessment – Habitats calculations for the Site
(see supporting Statutory Biodiversity Metric for detailed results and further information).

On-site baseline	Area habitat units	18.11	
	Hedgerow units	2.43	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	21.00	
	Hedgerow units	3.87	
	Watercourse units	0.00	
On-site net change (units & percentage)	Area habitat units	2.89	15.98%
	Hedgerow units	1.44	59.02%
	Watercourse units	0.00	0.00%
Off-site baseline	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Area habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	2.89	
	Hedgerow units	1.44	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
FINAL RESULTS			
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	2.89	
	Hedgerow units	1.44	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	15.98%	
	Hedgerow units	59.02%	
	Watercourse units	0.00%	
Trading rules satisfied?	Yes ✓		

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8. GLOSSARY

8.1 Scientific Terms and Acronyms

CIEEM Chartered Institute of Ecology and Environmental Management, the professional organisation and provider of professional codes of conduct for ecological consultancy.

NPPF National Planning Policy Framework.

Notable species A species which is listed as a UK Priority Species, carries an unfavourable conservation status (e.g. scarce, rare, threatened, Red-listed), is invasive or is otherwise worthy of note from an ecological perspective.

Protected species A species protected under specific UK or European legislation, including Habitats Directive, Wildlife and Countryside Act.

UK Priority Habitat and species A habitat or species identified as a priority for conservation in accordance with Section 41 of the Natural Environment and Rural Communities Act (2006). Section 40 of the NERC Act 2006 places a duty on public authorities to have regard for the conservation objectives of these habitats / species (also known as Section 41 (S41) habitats/species).

APPENDICES

PLANS & SUPPORTING FIGURES

BMD.22.0022.DRE.001 – Baseline Habitat Map
BMD.22.0022.DRE.002 – Post Development Plan
3481-5-2-DR-0001-P5 Landscape Strategy

-  Site boundary (5.4000 ha)
-  Target notes
-  Line of trees - 33 (466 m)
-  Line of trees - associated with bank or ditch - 33, 50 (142 m)
-  Modified grassland - g4 (4.0451 ha)
-  Bramble scrub - h3d (0.4840 ha)
-  onsite Pond (non-priority) r1 41 (0.0204 ha)
-  Developed land; sealed surface u1b (0.0038 ha)
-  Bare ground - u1c 510 (0.0218 ha)
-  Other broadleaved woodland - w1g (0.8249 ha)
-  offsite Pond (non-priority) r1 41 (0.0073 ha)
-  Scattered trees - 32 [3]

Google Satellite

Rev.	Description	-
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Client:

Thakeham Homes

Project:

College Lane

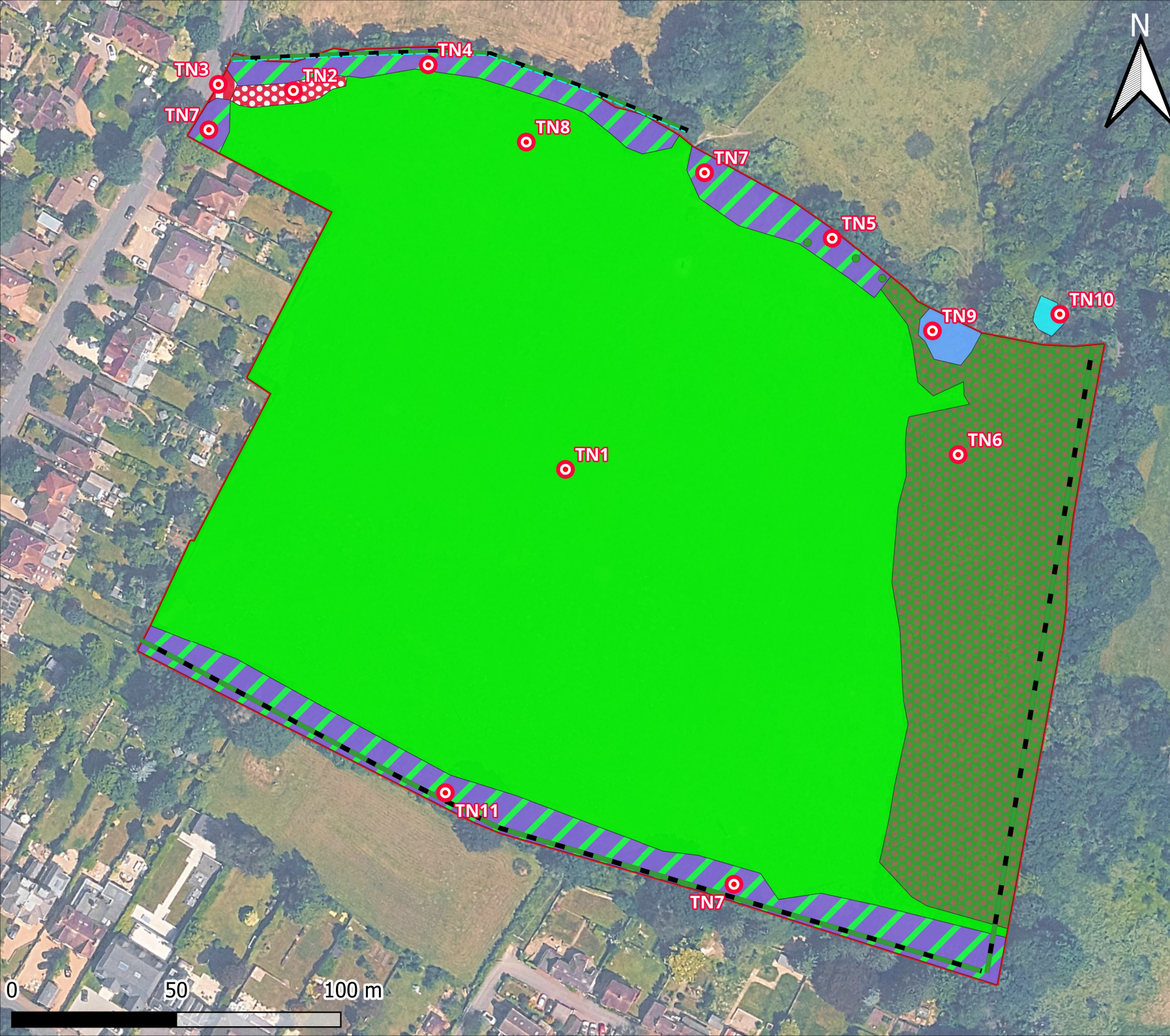
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Baseline Habitats

Drawn: MS	Checked: JW	Approved: JP	Date: 28/07/2026
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Job No. 22.0022	Scale: 1:1,500	Sheet Size:	Revision:
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Drawing Number:
BMD.22.0022.DRE.001



-  Site boundary (5.4000 ha)
-  Non-native and ornamental hedgerow - h2b (981 m)
-  Line of trees - 33 (466 m)
-  Line of trees - associated with bank or ditch - 33 (142 m)
-  Native hedgerow - h2a (146 m)
-  Other neutral grassland - g3c (0.5916 ha)
-  Modified grassland - g4 (0.2089 ha)
-  Bramble scrub - h3d (0.3485 ha)
-  Mixed scrub - h3h (0.1792 ha)
-  Onsite pond (non-priority) - r1 41 (0.0204 ha)
-  Offsite pond (non-priority) - r1 41 (0.0073 ha)
-  Proposed standing water - r1 41 (0.0544 ha)
-  Developed land; sealed surface - u1b (1.3601 ha)
-  Buildings - u1b5 (0.5576 ha)
-  Artificial unvegetated, unsealed surface - u1c (0.0155 ha)
-  Gardens - 827 (0.9471 ha)
-  Introduced shrub - 847 (0.1437 ha)
-  Reedbeds - f2e (0.1482 ha)
-  Other broadleaved woodland - w1g (0.8249 ha)
-  Scattered trees - 32 [3]
-  Proposed tree - 200 [178]

Google Satellite

Rev.	Description	-
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Project:

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Drawing Title:

Proposed Habitats

Drawn: MS	Checked: JW	Approved: JP	Date: 25/09/2026
Job No. 22.0022	Scale: 1:1,500	Sheet Size:	Revision:

Drawing Number:
BMD.22.0022.DRE.002

0 50 100 m

21/09/2026 David Jarvis Associates Ltd. 1:500 Scale Drawing. 21/09/2026 David Jarvis Associates Ltd. 1:500 Scale Drawing. 21/09/2026 David Jarvis Associates Ltd. 1:500 Scale Drawing.



Notes

Related Drawings: DIA Drawing based on Thakeham 'H119-THA-P02-ZZ-D-A-1010-Site Layout - Standard' rec'd 16/09/2026

Issue: Drawn by David Jarvis Associates Limited (CROWN COPYRIGHT. ALL RIGHTS RESERVED 2026 LICENCE NUMBER 0100031). This drawing is for Planning purposes only. Do not use this drawing for Construction. The information contained in the drawing should be used as a guide to the final forms and finishes of the landscape scheme. Any revisions to be approved by the Client and Local Authority

Scaling: Do not scale this drawing. Use given dimensions only.

Setting out: refer to Engineers for information regarding setting out. In the event of discrepancy refer to Engineers in the first instance.

Survey: Original survey provided by the Client.

Services: Where possible these are identified on the drawings but, for the avoidance of doubt all service/utility locations should be considered indicative until identified on site. To ensure those services / utilities shown are current refer to the original survey provider or utilities designer or Client for confirmation and further information regarding easements. In the event of new services being installed refer to the appointed Engineer. It is recommended that hazard warning tape 'danger electric cable'/'danger services' to be installed over all service routes (to remain on site) to current BS guidelines (BS7671).

Lighting: Refer to lighting engineers drawings.

Planting: Plant species are selected and located in line with consideration of the site conditions, NHBC guidelines and discussions with the Local Authority and design team. All plants and planting procedure to conform to the David Jarvis Associates Limited Landscape Specification that will accompany the Construction Issue Drawings. No species or plant location is to be varied without prior consent of the Landscape Architect.

Biosecurity: All plant stock to be sourced from a supplier certified to be pest and disease free and in accordance with Plant Passport / Animal and Plant Health Agency (APHA) and current DEFRA requirements. Supplier information / certification to be retained for a period of not less than 12 years and must be made available upon request.

Foundations: Developers / Contractors to ensure that all foundations (buildings and external walls) are designed and constructed so as to take into account, at the time of maturity, any existing or proposed trees, hedgerows or other vegetation on the application site or existing vegetation on land adjoining the site at the time of construction and any trees felled or hedgerows removed on or adjacent to the site during the previous 15 years. For this purpose the developer / contractors will submit all relevant details to the authority dealing with the Building Regulations Certificate.

Design Levels: Refer to Engineers where design levels are not shown.

CDM: Drawings to be read in conjunction with Designers risk assessment. Potential risks above that of those associated with the general construction typical to the drawing are identified below.

KEY

APPLICATION BOUNDARY / LAND WITHIN APPLICANT'S CONTROL

PROPOSED GRASS: PRIVATE FRONT / REAR

PROPOSED GRASS: AMENITY PUBLIC / SPECIES RICH GENERAL PURPOSE

MOWN GRASS PATH

PROPOSED PLANTED BEDS / SCRUB

PROPOSED REED BEDS / MARGINAL PLANTING

PROPOSED PERMANENT WATER & AQUATIC PLANTING

PROPOSED TREES

PROPOSED ORNAMENTAL HEDGES 0.6m HIGH

PROPOSED NATIVE HEDGE 1.2m HIGH

LEAP SAFETY SURFACE & ILLUSTRATIVE PLAY EQUIPMENT

REFER TO ENGINEER DRAWINGS FOR HARD SURFACING

Drawing Revision

Rev.	Date	Description	DWN	CKD
P5	21/09/2026	Amended to client comments.	RO	GR
P4	15/07/2026	Amended to client comments.	VB	GR
P3	14/07/2026	Amended to client comments.	VB	GR
P2	09/07/2026	Amended to new layout & client comments.	JB	GR
P1	30/06/2026	First Planning Issue	JB/GR	GR

Status

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THAKEHAM

Project

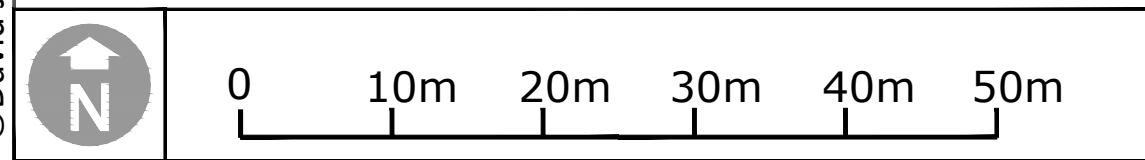
LAND OFF COLLEGE LANE, HURSTPIERPOINT

Drawing Title

LANDSCAPE STRATEGY

Scale	Sheet Size	Date Plotted	
1:500	A1	21/09/2026	
Client Ref.	Drawing Ref.	Drawing No.	Version
-	3481-5-2	DR-0001	P5

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A. METADATA AND LIMITATIONS

A.1 Metadata

Factor	Detail
Data	Biodiversity Net Gain Calculations
Reason for collection	To provide an audit of the predicted biodiversity net gain score for the Site using the Statutory Biodiversity Metric for the proposed development at Land at Lubards Farm, Rayleigh
Location	Land east of College Lane, Hurstpierpoint. Approx. Centre: TQ 29212 16026.
Date	September 2026
Method of collection	See Section 2
Assessment completed by	Jacqui Kenny MSc (Hons)
Assessment calculator used	The Statutory Biodiversity Metric (Natural England)
GIS software	ArcGIS Desktop 10.8 & ArcGIS Pro 3.1
AutoCAD software	N/A

A.2 Limitations review

Consideration	Comment
Survey & data	
Personal competence, i.e. qualifications, training, skills, understanding, experience	All assessment works were undertaken by or directly supervised by personnel experienced in biodiversity net gain assessments. <u>Jonathan Wood BSc (Hons) MCIEEM</u> has over 11 years' experience in ecological consultancy, including an experience of performing and coordinating the survey work and assessments undertaken at Site. <u>James Patmore CECOL CEnv MCIEEM</u> James has over 23 years of professional experience of ecological and biodiversity surveys and assessments. This has included developing monitoring mechanisms for a range of habitats, assessing impacts of development on biodiversity, undertaking biodiversity net gain calculations for both small sites and large-scale schemes and writing enhancement and mitigation strategies. Attended a number of training courses/conferences on biodiversity net gain delivered by specialist consultants, Natural England and CIEEM. <u>Mark Steele</u> is a GIS Consultant with over 10 years' experience in spatial data management, GIS mapping and spatial analysis across the utilities, construction and ecology sectors. His experience includes QGIS, ArcGIS Pro, geodatabases, spatial analysis, geoprocessing, georeferencing, field data validation and AutoCAD data integration. He has also produced BNG 4.0 and UKHab assessments to support development planning applications. GIS mapping and area measurements for this assessment were drawn and calculated by Mark Steele using appropriate GIS software and spatial measurement methods. <u>Jacqui Kenny MSC (Hons)</u> has over one years' experience in ecological consultancy, including field work, assessments and technical reporting. <u>Jasmine Whitmore BSc (Hons) ACIEEM</u> has three years' experience in ecological consultancy, including field work, assessments and technical reporting.
Resources (equipment and/or personnel)	Appropriate resources and suitably qualified personnel were used.
Time spent surveying	NA
Data (e.g. arising from incomplete or inappropriate surveys)	The data collected was sufficient for the purpose of the works.
Lack of statistical robustness and higher uncertainties	Appropriate statistical analysis of data was applied during this assessment. All uncertainties have been fully acknowledged and duly taken into consideration.
Old and out of date data	All data used is up to date from 2026.
Timing or seasonal constraints and suboptimal survey periods	N/A
Partial use of and/or departures from good practice guidelines	All assessments accorded with the relevant best practice guidelines.
Site conditions & other factors	
Adverse weather conditions	N/A
Restricted access to site or part of site	N/A
Unrealistic deadlines	No restrictions on survey data collected or analysed to date are as a result of unrealistic deadlines.
Unproven or untested measures for mitigation and compensation	N/A
Evaluation of conservation value and impacts	The evaluation of the conservation value of habitats within the Site and impacts of the development, are based on the most appropriate baseline information available.

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BIRMINGHAM



CAMBRIDGE

