

Ecological Assessment incl. Biodiversity

Net Gain Assessment Information

**Worth Abbey, Paddockhurst Road,
Turners Hill, Crawly RH10 4SD**

Report for Worth Abbey

June 2026

Our Ref: WS 804

Quality Assurance

Author	Michael Potter MSci (Hons)
Reviewed	Georgia Robertson BSc (Hons) Fiona Baker BSc, MSc, MCIEEM
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About Us

Bakerwell Limited has two offices, led by directors Fiona Baker and Donna Popplewell. The Directors have collectively 30 years experience in the ecological consultancy industry, hold relevant degrees, are qualified botanists, river corridor assessors and are trained in the use of biodiversity metrics to calculate no net loss/gain.

All staff are members, or training to be members, of the professional body for the environmental industry, the Chartered Institute of Ecology and Environmental Management (CIEEM) and hold Natural England European protected species licences for great crested newts, bats, beavers and dormice. Bakerwell Limited has SMAS Worksafe Health and Safety Accreditation; all staff hold relevant CSCS cards.

Bakerwell Limited is a consultancy specialising in ecological planning advice and surveys. Bakerwell also work in collaboration with trusted associates to provide Landscape Architecture, Arboriculture and Energy assessments.

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Appendix 1: Level of Importance

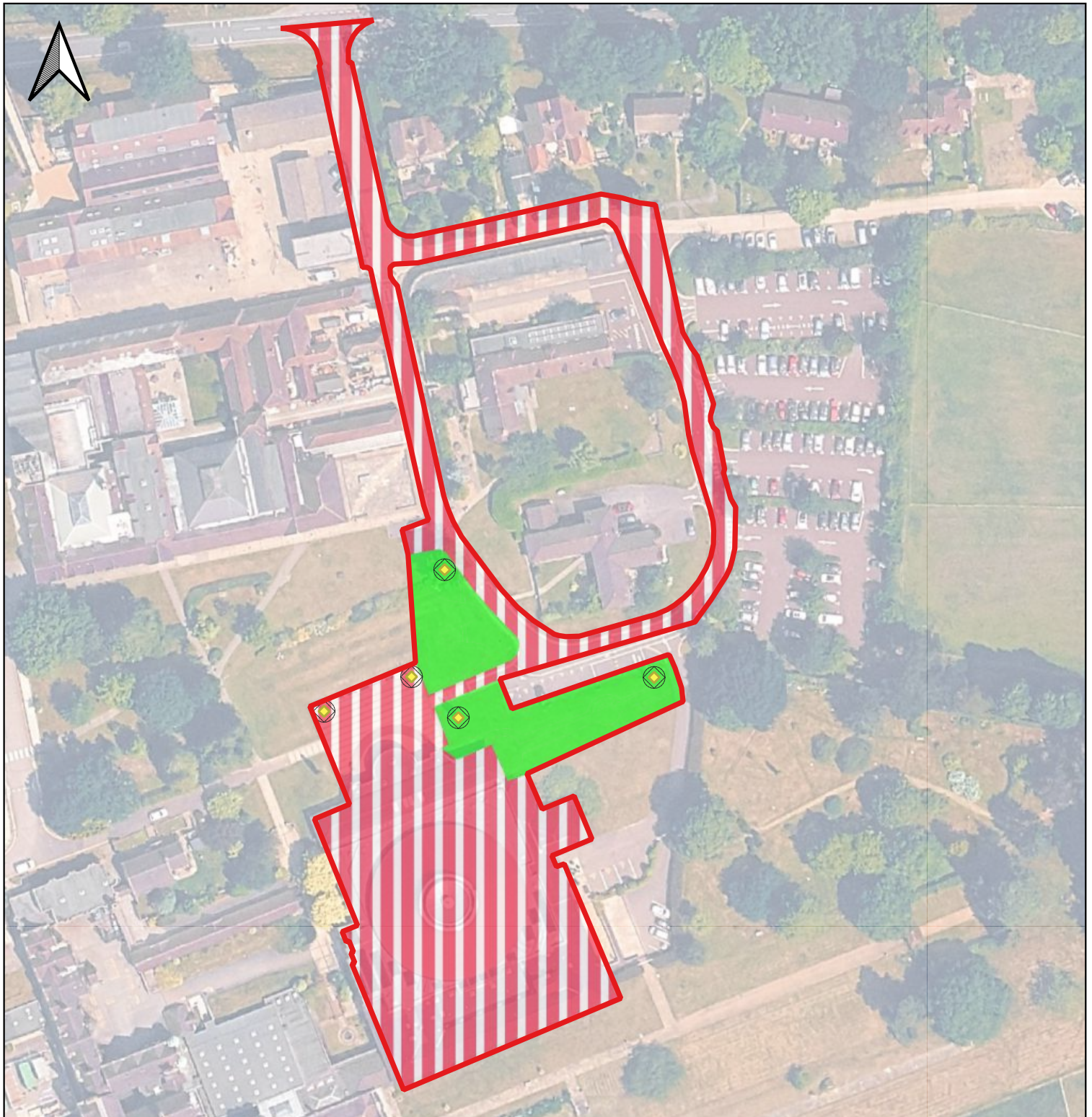
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Key



Site Boundary



u200 / g200 Urban Tree



u1b Developed Land; Sealed Surface



g4 Modified Grassland

0 30 60 m

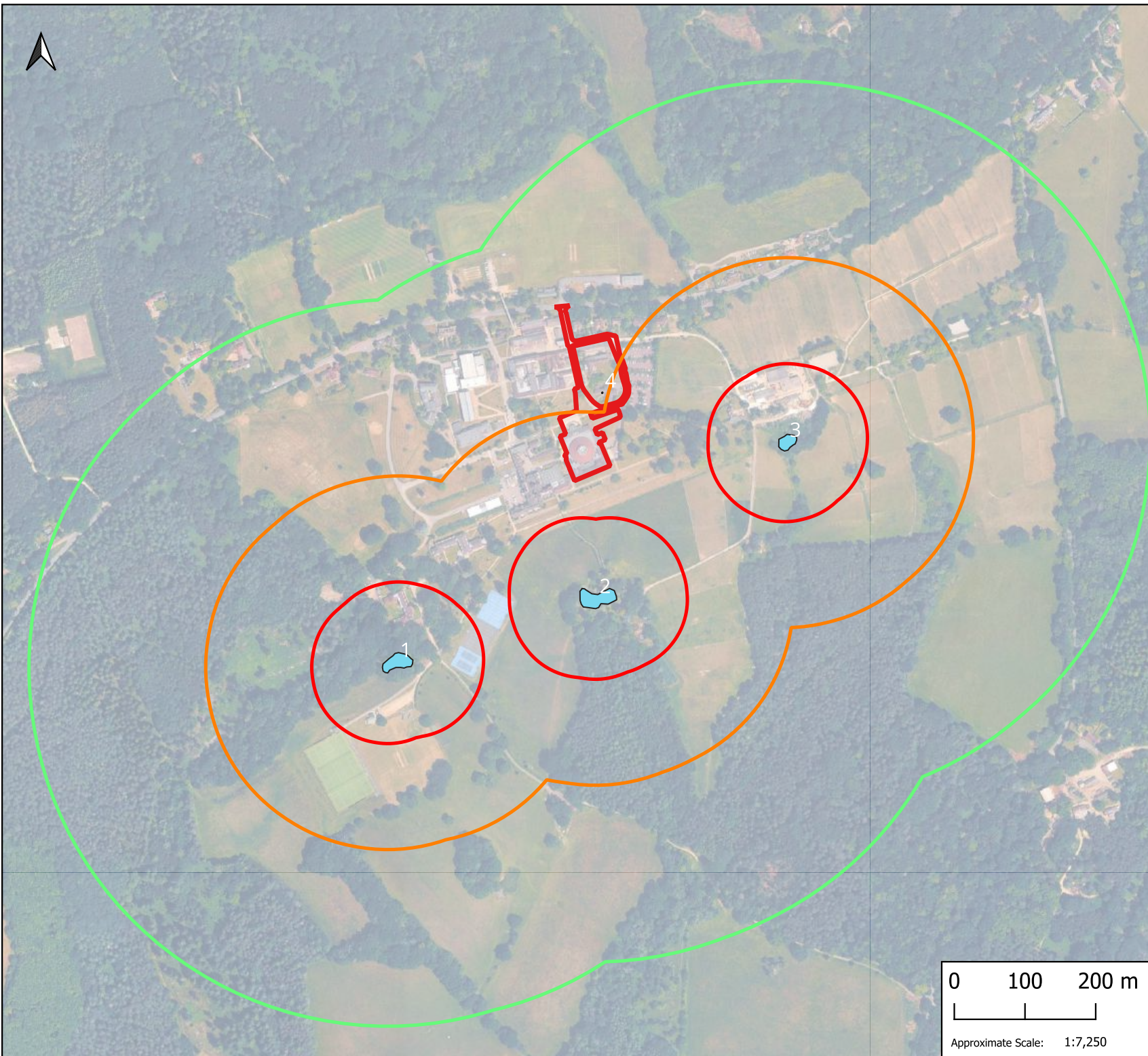
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Figure 1: UK Habitat Classification - Baseline

Site: Worth Abbey
Date: June 2026
Job: WS 804
Author/Reviewer: JP/GR

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Key

 Red Line Boundary

 Unsuitable Pond

 Potential GCN Pond

 100m Pond Buffer

 250m Pond Buffer

 500m Pond Puffer

Figure 2: Pond Plan

Site: Worth Abbey
Date: June 2026
Job: WS804
Author/Reviewer: JP/GR

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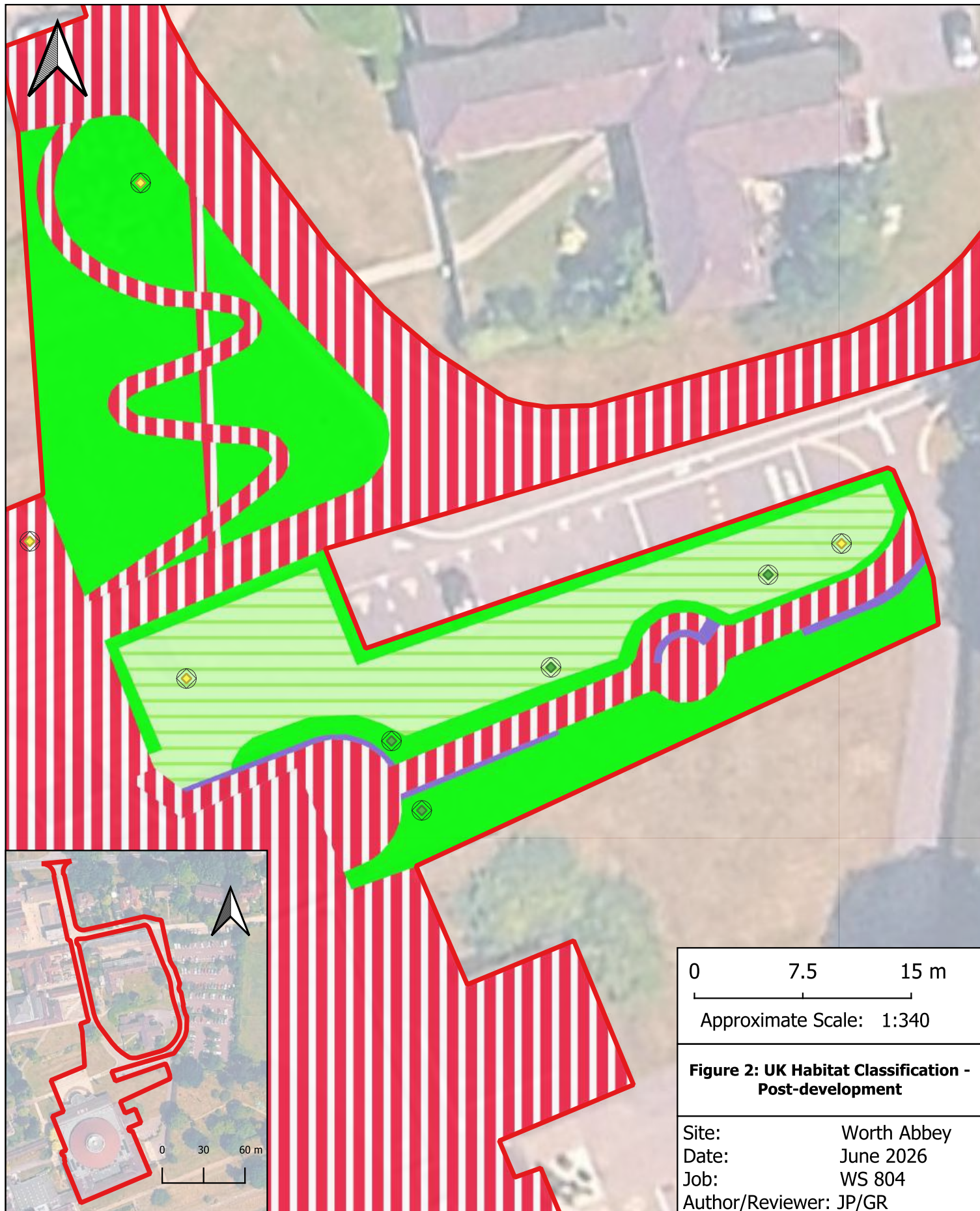
Contains OS data © Crown copyright and database
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Do Not Use for Construction Detail

0 100 200 m



Approximate Scale: 1:7,250



0 7.5 15 m

Approximate Scale: 1:340

Figure 2: UK Habitat Classification - Post-development

Site: Worth Abbey
Date: June 2026
Job: WS 804
Author/Reviewer: JP/GR

Key

- Site Boundary
- u1b Developed Land; Sealed Surface
- u 1160 Introduced Shrub
- g4 Modified Grassland
- g3c Other Neutral Grassland
- u200 / g200 Existing Tree
- g200 Proposed Tree

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1 Executive Summary

- 1.1 This Ecological Assessment (EA) provides the results of surveys undertaken in 2025 at Worth Abbey, Paddockhurst Road, Turners Hill. A UK Habitat Classification (UKHabs) was conducted in June 2025 and a visit to site to conduct a great crested newt (GCN) *Triturus cristatus* eDNA survey was June, 2025. This report (V2) provides an updated BNG assessment.
- 1.2 Provided the measures detailed within this report are implemented there will be no significant impact to any protected species as a result of the development. The design of the development is the creation of a welcoming arrival and environment to the Abbey church including new library space, refurbishment of toilets and the creation of new pathways to improve accessibility to the new entrance at the building narthex.
- 1.3 The biodiversity net gain assessment showed the baseline area of the site to be 0.8ha (including area of individual trees) generating 0.4 biodiversity units. Therefore, 0.04 units are required for 10% gain. This will be acquired through planting of five native trees.

2 Introduction

- 2.1 Bakerwell Ltd were commissioned by Worth Abbey to complete a Biodiversity Net Gain (BNG assessment) and an Ecological Assessment (EA), specifically regarding assessment of Great Crested Newts (GCN) for the proposed development at Worth Abbey, Paddockhurst Road, Turners Hill, Crawley RH10 4SD (hereafter referred to as the site).
- 2.2 This EA is based on the results of a UK Habitat Classification survey and GCN eDNA survey.
- 2.3 The site is located within the Worth Abbey grounds, central O.S. grid reference TQ31879 34305. To the north and west are school buildings and associated modified grassland amenity areas and hardstanding, to the east is the visitor car park and grassland to the south.
- 2.4 The site is approximately 0.77ha in size and formed predominantly of modified grassland and developed land; sealed surface, as shown in Figure 1.
- 2.5 The proposed works comprises the creation of a welcoming arrival and environment to the Abbey church including new library space, refurbishment of toilets and the formation of new footpaths and steps and the replacement of timber infill panels at either end of the Narthex with glazed openings.
- 2.6 This report has been compiled to follow the British Standard 42020:2013 Code of Planning and Development and the Chartered Institute of Ecology and Environmental

Management (CIEEM) Guidelines for Preliminary Ecological Appraisal (2018) and Guidelines for Ecological Report Writing (2017).

- 2.7 Recommendations within this report aim to demonstrate the approved development will conserve and enhance biodiversity in accordance with Chapter 15 of National Planning Policy, Section 180.

3 Aims and Objectives

- 3.1 The aim of the assessment was to identify and make recommendations to mitigate any impacts to protected species which may be utilising the habitats on/near to site and may be affected by the approved development. Specifically, objectives are to:

- Identify presence / likely absence of protected species and habitats
- Assess the impact of the proposals on the above species and habitats, if present
- Identify the number of habitat area and linear (e.g. hedgerow) units present prior to development (the BNG baseline and reference scenario);
- Identify the extent of habitats and linear features which will be lost or gained as a result of the proposed development;
- Identify the potential number of BNG habitat and linear units likely to be present post development, once all habitat creation and enhancement has reached the intended maturity;
- Identify whether BNG is likely to be achieved on Site or whether additional measures are likely to be required;
- Provide outline recommendations for mitigation of negative impacts
- Provide outline recommendations for biodiversity enhancements
- To provide the above in the context of legislation, local planning policy and evaluation of any potential impacts

4 Methodology

Desk Study

- 4.1 Desk studies are conducted to ascertain which habitats and species are or have been recorded on or within the surrounds of a proposed site. This information highlights areas of local ecological importance and provides an indication of which habitats and species may be expected to be in the vicinity. It also identifies statutory and non-statutory sites that are important for nature conservation within the locality and

facilitates an assessment of the potential direct and/or indirect impacts a development may have on these areas.

- 4.2 An in-house online desk study was completed using data acquired from www.MAGIC.gov.uk interactive maps, managed by Natural England (accessed in June 2025).

UK Habitat Classification Survey

- 4.3 Bakerwell Limited undertook a UK Habitat Classification Habitat Survey on 3rd June 2025. The survey was carried out by Georgia Robertson BSc (Hons) and Jude Potter MSci (Hons), who identified habitats present and assessed the condition they were in, following the standard UK Habitat Classification (UKHab Ltd, 2023).
- 4.4 Under the UKHabs methodology it is mandatory that each recorded habitat parcel is allocated a single primary habitat code and all essential secondary codes associated with that parcel. Secondary codes are used to provide information on habitat mosaics, habitat origin / modification, environmental content, management and/or land use.
- 4.5 This approach is followed, however some secondary codes are treated as distinct habitats within the BNG metric assessment. Therefore, for clarity these are shown as separate habitat types within Figure 1 and Section 9.
- 4.6 The site was surveyed on foot and existing habitats and land uses were recorded on an appropriately scaled map, see Figure 1.

Biodiversity Net Gain Assessment

- 4.7 The BNG assessment comprises collection of baseline field data to identify the habitats present and their condition prior to development. This data is then entered into a biodiversity metric to identify the number of biodiversity units present prior to development. This is split into a habitat area unit assessment and linear unit assessment (e.g. for hedgerows and rivers). The overall aim of the Biodiversity Metric calculator is to use habitats as a 'proxy' for biodiversity generally and to translate these into biodiversity units for the Site.
- 4.8 Once a post development layout is available, details of the loss or retention of each habitat and linear feature are entered into the metric, along with details of habitat creation or succession. This will confirm the number of habitat and linear feature units likely to be present on Site once the development is complete, and importantly once all habitats have reached their desired maturity.
- 4.9 The extent of losses and gains of each habitat can then be used to identify whether BNG will potentially be achieved on Site and to inform whether further measures are likely to be required to inform the design and fixed layout for the Site.

Field Survey and Data Collection

- 4.10 The UK Habitat Classification Survey included a condition assessment of habitat present on Site prior to development following the guidance set out in the Statutory Biodiversity Metric Technical Annex 1 (DEFRA, *et al*, 2024).
- 4.11 Results of the 2025 UKHab Classification Survey were used to inform the baseline calculations for the metric as detailed in Section 9. The Translation Summary in the Metric was used to translate the UKHab Classification Survey data into data which could be entered into the metric, and then habitats were further assessed against the habitat definitions within published guidance (UK Habitat Classification Working Group, July 2023) to ensure an appropriate match was identified.

Statutory Biodiversity Metric Calculation Tool

- 4.12 The Environment Bill requiring Biodiversity Net Gain has been passed and the secondary legislation enforcing this was brought into force in February 2024. The National Planning Policy Framework 2012 (amended December 2023) requires the LPA to “provide net gains for biodiversity”. This net gain assessment has been completed at an early stage when the requirement for a set level of biodiversity net gain is now mandated and adopted formerly into local policy.
- 4.13 The Statutory Biodiversity Metric Calculation Tool 2024 was used to undertake the BNG assessment, following guidance set out in the Statutory Biodiversity Metric User Guide (Panks, S. *et al*, 2024). A copy of the completed metrics are provided in Appendix 5 summary findings discussed in the results section of this report.

Bats

Trees

Daytime Bat Walkover

- 4.14 Georgia Robertson and Jude potter undertook an inspection of the trees on site and directly adjacent to site boundaries on the 3rd June 2025, to assess the potential for, or evidence of roosting bats. The inspection followed the Bat Conservation Trust (BCT) Good Practice Guidelines 4th edition (2023) survey methodology.
- 4.15 Trees were assessed in full sunlight from ground level using binoculars and a high-powered torch where necessary to assess potential bat roosting suitability including: any natural holes, hollows and cavities (cracks and splits), loose bark, epicormic and ivy growth were investigated as potential bat roosting features, see Table 1.

Table 1: Categories for Assessing the Suitability of Trees for Bats (BCT, 2023)

Suitability	Description
None	Either no PRFs in the tree or highly unlikely to be any.
FAR	Further assessment required to establish if PRFs are present in the tree.
PRF	A tree with at least one PRF present (PRF-1 features suitable for 1 – small number of bats, PRF -M features suitable for multiple bats, including tree or group of trees with multiple PRF-1 (possible maternity colony).

Herptiles

- 4.16 The habitats on site were assessed for their potential to support Herptiles. Features suitable for hibernation, basking, feeding, and raising young are considered.
- 4.17 OS and Magic maps were consulted during the online desk study to identify ponds present within 500m of the site boundary, desk study information regarding known records for great crested newts *Triturus cristatus* (GCN) along with habitat suitability and connectivity to the site are used to determine potential and further survey requirements for GCN.

GCN HSI Assessment and eDNA Survey

- 4.18 Ponds within 100m of site were visited to undertake a Habitat Suitability Index (HSI) and take eDNA samples by Fiona Baker (NE Licence No WML- CL08, 2015-18863-CLS-CLS) and Georgia Robertson (2022-10865-CL08-GCN) to check for suitability for GCN.
- 4.19 The criteria used to assess suitability of a pond are: geographical location, pond area and permanence, water and terrestrial habitat quality, shade, presence of water fowl or fish, number of ponds within 1km and percentage of macrophyte cover. A scoring method is assigned for each criterion. An overall score is then obtained which is used to define pond suitability as follows:
- <0.5 poor suitability
 - 0.5-0.59 below average
 - 0.6-0.69 average
 - 0.7-0.79 good
 - >0.8 excellent
- 4.20 HSI assessments are not a replacement for GCN surveys but are a general measure of suitability of a waterbody for GCN, based on physical characteristics of a waterbody

and the surrounding environment. The assessment will either indicate the requirement for GCN surveys or highlight the option of obtaining a District Level License, if required.

- 4.21 Georgia Robertson and Fiona Baker attended the pond within 100 m of the site (Pond 4) on 16th June 2025 with the intention of collecting field samples for eDNA analysis in accordance with Technical Advice Note WC1067 (Biggs et al., 2014).
- 4.22 On arrival, the pond was found to be completely dry, with no standing water present. As a result, eDNA water sampling could not be undertaken. In line with best practice, a visual hand search of the pond, vegetation in the pond and pond margins was conducted for evidence of GCN or eggs.
- 4.23 Had water been present, the methodology would have followed Technical Advice Note WC1067 (Biggs et al., 2014), requiring the collection of 20 water samples evenly spaced around the pond margins (where access allows), combining them, and sending six sub-samples for laboratory analysis.

GCN Natural England Rapid Risk Assessment

- 4.24 Natural England's Rapid Risk Assessment tool (RRA) was used to assess the impacts of the proposed development on potential breeding GCN populations within 500m of the site. The Risk Assessment tool calculates an 'offence probability score; to determine whether avoidance measures or a license will be required prior to the development. The results of these calculations re given in Section 6

Dormouse Habitat Assessment

- 4.25 A visual assessment of habitats present on and immediately adjacent to the site was carried out by Georgia Robertson and Jude Potter (accredited agent under Donna Popplewell NE Class Survey Licence no. 2015-18099-CLS-CLS/ WML-CL10a) for their suitability to support dormice *Muscardinus avellanarius*, following the guidance provided in the Dormouse Mitigation Handbook (Mammal Society, 2025). Connectivity with suitable off-site habitats, features suitable for nest building, foraging, shelter and hibernation were considered.
- 4.26 The habitat assessment is used to estimate population density and inform the extent of compensatory habitat required should evidence of dormouse presence be found and includes an evaluation of the following:
 - Species diversity and structural complexity
 - Abundance and distribution of bramble and low lying thicket
 - Nature of any habitat management
 - Size and distribution of habitat fragments
 - Gaps in corridors, barriers to movement
 - Connectivity to habitat off site

Nesting Birds

- 4.27 Habitats on site were assessed for their suitability to support nesting and foraging birds. Any birds or nests observed during the survey were recorded and will be discussed in Section 5.

Other Species

- 4.28 Incidental observations of other, important or notable species were also recorded, where found these are included in Section 6.

Non-native invasive plant species

- 4.29 The survey on the 3rd June 2025 also included a search for the presence of non-native invasive plant species as listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

5 Limitations

- 5.1 The results of surveys detailed within this report provide evidence of the presence of protected species of flora and fauna, or the potential for such species, evident at the time of the survey.
- 5.2 Due to the transient nature of fauna such as GCN and their habitats, the results of this survey are considered to be valid for 12 months from completion of the survey (CIEEM, 2019), unless otherwise stated in relation to specific species within this report and unless there is sufficient justification to show otherwise, in line with best practice guidance.
- 5.3 Survey methodology guidance is updated periodically following advances in ecological evidence and technology. Survey methodology is consistent with best practice guidance at the time of survey.

Online desk studies are completed using data acquired from www.magic.gov.uk interactive maps, managed by Natural England. Data present has not been updated consistently. For example, granted protected species records do not contain information succeeding 02/06/2025 / reference made to this online data is in accordance with the data as is available on Magic at the time of undertaking the search.

- 5.4 The age and methodology of survey data collected, and mitigation considered acceptable by Natural England for the purpose of assessing whether to grant a European Protected Species Mitigation Licence (EPSML) is subject to change by Natural England at any time. Survey data may need to be updated within the survey season immediately prior to the EPSML application.
- 5.5 Vegetation surveys are limited during the winter months, with the possibility for annual species not to be visible, however in conjunction with the desk study information, the

results are sufficient for a PEA assessment, giving information on dominant and common species and habitat structure to inform any requirement for additional seasonally specific survey. Where Biodiversity Net Gain Assessment will be required at a later stage additional detailed botanical survey during the optimal season for the habitats identified will be required to collect species lists and condition information where earlier survey indicate structural and composition variation consistent with medium to high quality habitats.

- 5.6 Assessment for the presence or absence of invasive species will depend on the accessibility of the habitats on site, and the time of year for example scrub or other dense vegetation will restrict access and visibility. Surveys carried out in winter may not capture plants where leaf growth has not started.
- 5.7 The survey was conducted in June at the end of GCN breeding season. During the visit the pond was dry and an eDNA sample could not be retrieved. A Habitat Suitability Index, a search for eggs in vegetation remaining in pond and an assessment of the surrounding habitat were all conducted to inform the likelihood of GCN presence.
- 5.8 Assessments within this report are based on a site visit and the proposed site layout provided by the client. Subsequent changes to the layout may result in a requirement to reassess the potential impacts of the development and the requirements for future survey, or avoidance, mitigation and enhancement measures.
- 5.9 The BNG assessment is only a prediction of BNG until the development is complete and all habitats have reached their intended maturity. Any changes to the design and extent of the development habitats and their management following creation is likely to result in a change to the number of BNG units achieved post development.
- 5.10 BNG does not apply to statutory designated sites or irreplaceable habitats (such as ancient woodland) and does not replace the legal and policy protection of these, or where present on site, any survey or mitigation for protected species which are considered separately within the Ecological Assessment.
- 5.11 The conditions of the habitats and linear features are noted from site visits, however management practices undertaken on habitats can impact on the condition of the habitat / feature, for example, flailing of hedgerows. Therefore, the condition assessment is limited to the results of the UK Habitat Classification completed in 2025 and does not take in to account changes from standard habitat management practices that have occurred since the survey.
- 5.12 Data collection by hand or electronically on Site, even following quality assurance measures will have small possible variable areas of measurements, when transposing to QGIS. This may require a very small proportion of habitat creation to be added manually added to the metric, meaning that the output from QGIS may vary in a very small way to the final measurements added to the metric.

- 5.13 Any manual adjustments will be undertaken on a precautionary approach and added to sealed development surfaces (e.g. roads and buildings) and then amenity grassland if required to avoid over-estimates of natural habitat creation.
- 5.14 The statutory metric calculation includes assumed work footprint based on discussions and plans received from the Client on 30.06.2025. Should the extent of habitat loss encroach beyond stated and agreed boundaries, or if damage has occurred, where the extent goes beyond estimated temporal or delivery risk multipliers, a recalculation would be necessary to ensure adequate compensation, post development.
- 5.15 Recommendations for mitigation and enhancements provided within this report are based on the initial findings of habitat and/or protected species surveys undertaken to date, current best practice guidance and legislation in place at the time of writing.
- 5.16 Findings and recommendations within this report are based on the professional opinion of qualified and experienced ecologists and do not constitute professional legal advice. In submitting these recommendations, Bakerwell Limited has no design liability associated with these recommendations.

6 Results and Discussion

- 6.1 In this section the results and subsequent implications of the surveys are discussed and assessed in context of previous ecological assessments and the potential impacts of the approved development. Measures for mitigation, in the context of relevant guidance and legislation are provided in Section 8, recommendations for enhancement are given in Section 9. A summary of relevant legislation is provided in Appendix 2.

Desk Study

- 6.2 The immediate surrounding habitats of the site are school and church buildings with associated modified grassland amenity areas and hardstanding to the north and west, car park to the east and modified grassland to the south.

Statutory Designated Sites

- 6.3 The site is within the High Weald National Landscape which is designated to protect high levels of biodiversity from ancient woodland.
- 6.4 Ashdown Forest is an internationally designated site due to mixed woodland, Heath, scrub, maquis, garrigue and phygrana. Located 7.81km east of the site, Ashdown forest is listed as both a Special Area of Conservation (SAC) and a Special Protection Area (SPA). Given the size of this proposal, the distance to the designated area and a lack of similar habitats on site it is considered unlikely that the proposed development will have an impact on Ashdown Forest and therefore a Habitats Regulations Assessment (HRA) is not required.

- 6.5 The following nationally designated statutory sites are located within 2km of the site boundary: Wakehurst and Chidingly Woods Site of Significant Scientific Interest (SSSI) and Worth Forest SSSI. Designated sites and their distance from the site are summarised in Table 2.
- 6.6 The proposed development is in the impact risk zone of Wakehurst and Chiddingly woods, Worth Woods, Cow wood and Harry's wood SSSI. The proposed development is unlikely to pose a risk to SSSIs as it is considered a rural non-residential development. The Local Planning Authority does not normally need to consult Natural England on this type of proposal regarding likely impacts on SSSIs.

Non-statutory Designated Sites

- 6.7 There are no non-statutory designated sites located within 2km of the site.

Table 2: Statutory Designated Sites Located within 2km of the Site Boundary

Site Designation/ Reference	Reason for Designation	Approx. Distance and Direction from Site
Statutory Designated Sites		
High Weald	Ancient Woodland	0km
Wakehurst & Chidingly Woods	Exposure of sand rock	1.22km SE
Worth Forest	Ancient woodland	1.75km SW
IRZs of SSSI sites		
IRZ of Wakehurst and Chiddingly woods, Worth Woods, Cow wood and Harry's wood	Impact zones of SSSIs	0km

Table 3: Statutory Designated Sites Located within 8km of the Site Boundary

Site Name	Reason for Designation	Approx. Distance and Direction from Site
International Statutory Designated Sites within 8km		
Ashdown Forest	Mixed woodland, Heath, scrub, maquis, garrigue and phygrana	7.81km E

Ancient Woodland

- 6.8 The site is located approximately 200m north from the closest area of ancient woodland listed on the woodland inventory as Balcombe wood, with further areas within the 2km search area.

Priority Habitats

- 6.9 There are two priority habitats within 2km of the site. Lowland meadows are situated approximately 930m to the northwest of site and Traditional orchards are located approximately 1.96km southeast of the site.
- 6.10 Connectivity to the wider areas including the continuity of habitat to designated sites is interrupted by the roads and residential areas present which act as dispersal barriers to wildlife in these areas.
- 6.11 The site is formed of amenity grassland and hardstanding; it is therefore considered to be of low ecological importance and do not support the off-site quality habitats.

UK Habitat Classification

- 6.12 A total of three UK Habs Primary habitat types were recorded on site, namely: g4 Modified Grassland (two parcels comprising g4 108 Frequently Mown) ,u1b Developed land sealed surface and u200 / g200 Urban Tree
- 6.13 Figure 1 shows the location of these habitat types within the site footprint. Photographs of habitats on site are included in Appendix 4.

g4 Modified Grassland

- 6.14 There are two areas of g4 108 frequently mown modified grassland with low species diversity, though species will be identified during suitable periods alongside condition assessments. The sward length is short and uniform across both areas. Modified grassland is automatically assigned a low distinctiveness score for BNG purposes and

both areas were determined to be of poor condition using the UK habitat condition assessment.

U1b Developed Land Sealed Surface

- 6.15 Developed Land sealed surface is found on site in the form of tarmac roads that make up the access routes into the wider site of Worth Abbey and Worth School, as well as the Worth Abbey building itself.

U200 / G200 Urban Tree

- 6.16 5 trees are present on site, three of which sit within modified grassland and 2 of which are located on hardstanding. All trees are in an urban environment and are considered urban trees.

Bats

Trees

Daytime Bat Walkover

- 6.17 No trees on site were recorded as having any PRFs and all trees are categorised as suitability 'NONE'. Therefore, development will not impact roosting bats and no further surveys are required

Evaluation of Bats in Light of the Development

- 6.18 Bats, and their roosts, are protected under the EU Habitats Directive (transposed into UK law as the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019), and the Wildlife and Countryside Act 1981 (as amended). This protects bats from killing, injury, capture and disturbance and their roosts from damage, destruction and obstruction.
- 6.19 As no bats are roosting in trees on site, no impacts to roosting bats will result from the proposed development and a EPSML is not required.
- 6.20 The wider surrounding area has habitat such as ancient woodland that is considered good quality habitat for both roosting and foraging and commuting bats. Additionally, the wider site of Worth School holds historical records of roosting bats within school buildings. Considering this, it is considered likely that bats will forage and commute through site.
- 6.21 All trees will be retained on site and with additional tree and wildflower planting, as outlined in section 9, therefore development will not impact foraging and commuting activities.

- 6.22 Inappropriate lighting during and post construction could disrupt the current and future use of the site as foraging and commuting habitat, and therefore a precautionary lighting strategy is outlined in Section 8.

Herptiles

- 6.23 The closest site with a granted EPSML for GCN is located approximately 4km to the northeast from May 2014.
- 6.24 There are three ponds located within 500m of the site, located using Magic maps and a further ornamental pond discovered within 100m of the site boundary, within the wider Abbey and School grounds. See Figure 2.
- 6.25 The habitats onsite are unsuitable for herptiles. The modified grassland is mown regularly and is maintained at a very short length reducing the suitability for GCN and reptile habitat. Furthermore, both areas of modified grassland are surrounded by hardstanding such as roads and buildings reducing the connectivity from surrounding habitats.

GCN HSI Assessment and eDNA Survey

- 6.26 Pond 4 is an ornamental residential pond within 100m of the site boundary. The pond is less than 50m² and immediately surrounded by highly managed modified grassland, hardstanding and a stone wall marking out the residential garden boundary from the rest of the School and Abbey grounds. This pond was dry at the time of survey.
- 6.27 Ponds 1-3 are located within 500m of the site boundary within the wider Worth School grounds. These ponds were assessed using satellite imagery and are located within small, isolated areas of woodland to the south of the site boundary within amenity school playing fields.
- 6.28 As ponds 1-3 were only assessed using satellite imagery, the precautionary approach of assuming these ponds have GCN present has been adopted.
- 6.29 Pond 4 was determined to have poor suitability for GCN using the HSI assessment (Table 4) and therefore considered unsuitable for GCN. An eDNA survey was attempted on Pond 4 to further rule out the possibility for GCN presence. At the time of survey, the pond was dry and eDNA samples could not be collected. However, there was evidence that the pond would contain water in wetter months, therefore, a hand search for GCN and eggs was conducted, in which, no evidence of GCN was discovered. Pond 4 is therefore deemed unsuitable for GCN with GCN not present and was omitted from the Rapid Risk Assessment.

Table 4: Habitat Suitability Index results of Pond 4

Pond Number	Description	HIS Score	Suitability for GCN
4	Pond located in walled off residential grounds surrounded by modified grassland and hardstanding.	0.4021	Poor

Natural England Rapid Risk Assessment

- 6.30 The proposal will not result in the loss of any ponds; however, it will require a small amount of clearance of modified grassland habitat to facilitate the construction of two hardstanding pathways. This will result in a permanent habitat loss of 0.025ha within 100m of pond 4 but only 0.015ha within 100-250m of ponds 1-3 and 0.0087ha within 250-500m of ponds 1-3.
- 6.31 Natural England's Rapid Risk Assessment tool was used to ascertain if this would result in an offence under current legislation without mitigation measures in place under the precautionary assumption that GCN are present in ponds 1-3. The result is an offence probability score of 0.01 green, meaning an offence is highly unlikely (Table 5).

Table 5: The results of Natural England's Rapid Risk Assessment (RRA)

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.01
Land >250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.001
Individual great crested newts	No effect	0
	Maximum:	0.01
Rapid risk assessment result:	GREEN: OFFENCE HIGHLY UNLIKELY	

- 6.32 Natural England provides the following guidance following results of the RRA:

"Green: offence highly unlikely" indicates that the development activities are of such a type, scale and location that it is highly unlikely any offence would be committed should the development proceed. Therefore, no licence would be required. However, bearing in mind that this is a generic assessment, you should carefully examine your specific plans to ensure this is a sound conclusion, and take precautions (see Non licensed avoidance measures tool) to avoid offences if appropriate. It is likely that any residual offences would have negligible impact on conservation status, and enforcement of such breaches is unlikely to be in the public interest."

Evaluation of Herptiles in light of the development

- 6.33 Common species of reptiles are protected from killing/injury under the Wildlife Countryside Act 1981 (as amended).
- 6.34 Great crested newts, and their breeding/resting places, are protected under; the EU Habitats Directive (transposed into UK law as the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019), and the and the Wildlife and Countryside Act 1981 (as amended). Together these protect GCNs from killing, injury, capture and disturbance, and their breeding/resting places from damage, destruction and obstruction.
- 6.35 Pond 4 is considered unsuitable for GCN and further survey proved GCN are not present. The precautionary approach taken assumes ponds 1-3 have GCN present, however the NE RRA shows that the limited amount of unsuitable habitat for both GCN and reptiles that is to be impacted by the development, will not impact GCN and therefore no further survey for herptiles is required and the proposal is considered compliant with all known legislation and policy in regard to GCN and reptiles. These species are not discussed further in this report.

Dormice

- 6.36 Dormice and their breeding/resting places are protected under the EU Habitats Directive (transposed into UK law as the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019), and the, and the Wildlife and Countryside Act 1981 (as amended).
- 6.37 Although the wider area has good quality habitat with the potential to support dormouse such as ancient woodland, the habitat assessment on site found that no on site habitats have the potential to support dormice as outlined in in the Dormouse Mitigation Handbook (Mammal Society, 2025). There is no connectivity to areas of good quality habitat and therefore the proposal is considered compliant with all known legislation and policy in regard to Dormice. This species is not discussed further in this report.

Breeding Birds

- 6.38 All active bird nests are protected under the WCA 1981 from damage/destruction. Furthermore, birds that are listed on Schedule 1 of the Act are also protected from disturbance while they are nesting.
- 6.39 Although no nests were recorded on site, the 5 trees on site have the potential to support breeding birds.

- 6.40 All trees are due to be retained as part of the development; however construction may cause disturbance and therefore recommendations for timing of works and supervision if required are provided in Section 9.

Other Protected Species

Hedgehog and badger

- 6.41 Trees, piles of dead timber and lines of hedge are considered suitable for hedgehog, and whilst none of these features were recorded on site and no hedgehog or badgers were observed during the site survey, it is considered possible that they may commute through site to reach suitable habitat and habitat features within the wider site grounds.

Invasive Species

- 6.42 No invasive species were recorded on site.

7 Planning Context

- 7.1 Relevant protected species legislation is given in Appendix 2.

National Planning Policy

- 7.2 Biodiversity, in particular, protected species and habitats, is a material consideration of all planning applications. The National Planning Policy Framework (NPPF) was first published in March 2012 and updated in July 2018, February 2019, July 2021, September 2023 and 20th December 2023. This sets out the government's planning policies for England and how these are expected to be applied.

- 7.3 The NPPF requires that the local planning authority should aim to enhance biodiversity when determining planning applications, and opportunities to incorporate biodiversity in and around developments should be encouraged, especially where this can secure measurable net gains for the environment. Chapter 15 "Conserving and enhancing the natural environment, paragraphs 180-194", states that this should be achieved 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.."

- 7.4 The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Schedule 7A (Biodiversity Net Gain England) of the Town and Countryside Planning Act 1990. This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021, and was amended by the Levelling Up and Regeneration Act 2023. The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 made consequential amendments to other parts of the 1990 Act.

7.5 The biodiversity net gain regulations most directly relevant to planning are:

- The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 which commence biodiversity net gain for most types of new planning applications and provides transitional arrangements for section 73 permissions.
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024 which prescribe exemptions for categories of development to which biodiversity net gain does not apply.
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) Regulations 2024 which amend the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013 to include provisions in respect of applications for planning permission and the submission and determination of Biodiversity Gain Plans, as well as modifications of Schedule 7A of the Town and Country Planning Act 1990 for phased development.
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 which set out the modifications for irreplaceable habitat, irreplaceable listed are blanket bog, lowland fens, limestone pavements, coastal sand dunes, ancient woodland, ancient and veteran trees, Spartina saltmarsh swards and Mediterranean saltmarsh scrub .

7.6 In addition, there are regulations for the Biodiversity Gain Site register established under section 100 of the Environment act 2021 for registered offsite biodiversity gains.

Regional/Local Planning Policy

7.7 The Mid Sussex District Council Local Plan “Mid Sussex District Plan 2014-2031” was adopted March 2018. Policy DP38 relates specifically to conservation of biodiversity:

Policy DP38 – Biodiversity

“Biodiversity will be protected and enhanced by ensuring development:

- *Contributes and takes opportunities to improve, enhance, manage and restore biodiversity and green infrastructure, so that there is a net gain in biodiversity, including through creating new designated sites and locally relevant habitats, and incorporating biodiversity features within developments; and*
- *Protects existing biodiversity, so that there is no net loss of biodiversity. Appropriate measures should be taken to avoid and reduce disturbance to sensitive habitats and species. Unavoidable damage to biodiversity*

must be offset through ecological enhancements and mitigation measures (or compensation measures in exceptional circumstances); and

- *Minimises habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats and increase coherence and resilience; and*
- *Promotes the restoration, management and expansion of priority habitats in the District; and*
- *Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated Sites of Nature Conservation Importance, Local Nature Reserves and Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including wildlife corridors, aged or veteran trees, Biodiversity Opportunity Areas, and Nature Improvement Areas. Designated sites will be given protection and appropriate weight according to their importance and the contribution they make to wider ecological networks."*

8 Mitigation Measures

- 8.1 The following recommendations are provided to ensure no harm will come to protected species residing on or moving through site and to mitigate the loss of habitat to such species.

Designated Sites

- 8.2 The site is located within the IRZ of the Worth Forest and Wakehurst and Chidingly woods SSSIs. However, due to the minimal size of the area affected, it is deemed unlikely to pose a risk to the SSSIs and does not require Natural England to be a consultee.

Bats

- 8.3 Although there is no suitable habitat for roosting bats on site, the surrounding area provides good habitat roosting as well as foraging and commuting. It is considered likely that the site could be utilised for commuting bats. Therefore, a precautionary lighting strategy should be followed to reduce disturbance to bats.

- 8.4 The lighting strategy will be tailored to objectives DS1 and DS2 of the High Weald Management Plan 2024-2029:

“Objective DS1

To preserve the dark skies of the High Weald AONB by minimising light pollution, obtrusive external lighting and internal light spill from domestic, commercial, and public premises in both existing and new developments within the High Weald, and from highways lighting. underpinned by the following rationale: To protect and maintain the existing dark skies within the High Weald for the benefit of all, including future generations for our health and wellbeing, and enjoyment, to increase our understanding and sense of place in the universe; and for the benefit of wildlife and to reduce energy consumption.

Objective DS2

To protect wildlife and habitats from light pollution across the High Weald. underpinned by the following rationale: Light pollution affects a wide range of nocturnal species, and those out during the day, from feeding to finding a mate and the ability to safely migrate. Light pollution is an additive stressor to habitat loss for already declining populations of many species across the High Weald.”

- 8.5 The lighting strategy will include the following measures:

- The lighting design will follow the latest guidance (Bat Conservation Trust, 2023; Institute of Lighting Professionals, 2023), available from <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>).
- The lighting for the scheme will ensure no lighting of confirmed or potential roost features including bat boxes or associated flight paths.
- Construction works will take place during daylight hours only and no artificial lights will be used at any time which result in lighting of the boundary habitats during construction.

Breeding Birds

- 8.6 The trees on site provide suitable nesting habitat. Construction works will, where possible, avoid the bird nesting season, March to August inclusive. Should it not be possible to avoid this period, works will be completed immediately following a nesting bird check of the trees on site, conducted by a suitably qualified ecologist. If an active bird nest is discovered a buffer zone will be erected and works will cease in that area until the young have fledged.

Other Species

- 8.7 If any species not discussed within these mitigation measures is found on site during construction, all works will cease, and a suitably qualified ecologist will be contacted. Relevant mitigation measures will be put in place, or a relevant license will be sought.

Hedgehog and badger

- 8.8 Due to the likelihood of badgers and hedgehog commuting and foraging through site, precautionary measures are required during construction to avoid trapping badgers or hedgehog in trenches or holes. These will comprise covering any steep sided holes or trenches or leaving a sturdy ramp or plank within to provide an escape route.
- 8.9 Providing these measures are followed the development will be compliant with all known legislation and planning policy pertaining to badgers and hedgehog.

9 Biodiversity Net Gain Assessment

- 9.1 This section sets out the baseline of the Application Site. As baseline habitats are present on site the Area Habitat Baseline Units (AHBU) are discussed below. The baseline habitats will remain unchanged unless there is a change to the condition or extent of habitats on the Application Site. Figure 1 shows the baseline habitats and linear features on site using UKHabs habitats available within the metric.

Habitats Present Prior to Development

- 9.2 There are two UKHabs primary habitat types recorded on the Application Site providing the baseline for the Application Site of 0.79ha (excluding urban trees) and equates to 0.26 AHBU as detailed in Table 6. There are five urban trees that provide 0.0326ha at 0.13 AHBU. This equates to a baseline for the Application Site entire of 0.82ha and 0.39 AHBU (Appendix 3).

Table 6. Summary of Baseline Units by Habitat

Habitat Type	Area (ha)	Units
Modified grassland	0.13	0.27
Developed land; sealed surface	0.64	0
Urban tree	0.03	0.13
TOTAL	0.8	0.4

Modified Grassland

- 9.3 This habitat is represented on Figure 1 by g4 Modified grassland and is assigned a low distinctiveness and achieves Poor condition primarily due to the lack of species variety and the high level of human disturbance due to formal lawn management. The modified

grassland generates 0.27 AHBU from 0.13ha. The metric requires that the same distinctiveness (Low) or better habitat is provided post-development.

Developed land; sealed surface

- 9.4 The developed land; sealed surface present on site is predominantly the abbey building, pavement access and the access road through the abbey grounds. This habitat type automatically achieves a Very Low distinctiveness score and does not receive a condition score. This habitat is represented on Figure 1 by u1b – Developed Land Sealed Surface and makes up 0.64ha. This habitat within the metric generates no habitat units and does not require compensation for any loss of this habitat.

Urban trees

- 9.5 There are five existing urban trees on site comprised of one medium and four small trees. All trees were assigned a Medium distinctiveness and achieved a poor condition. Urban trees generate a total of 0.13 ABHU.

Baseline Biodiversity Units Summary and Net Gain Requirements

- 9.6 The Application Site is dominated by developed land; sealed surfaces, which are used by visitors and their vehicles and generate no AHBU, with modified grassland next most common habitat on the Application Site which is subject to high levels of human disturbance and management.
- 9.7 The total number of AHBU generated is 0.4. Therefore, to achieve a 10% net gain (Environment Act, 2021), a total of 0.04 AHBU are required post development.

Mitigating the Loss of Habitats

- 9.8 In accordance with principle one of the good practice guidelines, the mitigation hierarchy will be followed for the proposed development. The design aims to avoid impacts to habitats, especially those with high distinctiveness, and minimise impacts on biodiversity. Compensation off site will only be explored as a last resort, where on-site in the Application Site) options are not possible or not ecologically appropriate.
- 9.9 The metric provides rules for actions to address the loss of each habitat, to ensure that the same or similar habitat of better-quality habitat is provided. These rules are shown in the metric results as 'trading rules'; these need to be satisfied, allowing the conclusion that BNG can be achieved within the rules.
- 9.10 For the creation of habitat on site, the loss of modified grassland must be mitigated with the same distinctiveness or better habitat, for example with the creation of amenity or higher distinctiveness grassland.

Post Development

- 9.11 This section sets out the predicted change following the implementation of the proposed development. This includes loss of baseline biodiversity units and details the number of units obtained from habitat creation and enhancement across the Application Site post development. The post development assessment will be updated following any change to the layout or landscape design.

Habitat Lost to the Development

- 9.12 Approximately 0.13ha of habitat will be lost to the development, comprised of modified grassland totalling a loss of 0.27 AHBU.

Habitat Retained Post Development

- 9.13 Of the total Application Site area, 0.67ha is shown in the metric as being retained on site in its current condition post development. This comprises 0.64ha of developed land; sealed surface and 0.03ha of urban trees.

Habitat Creation Post Development

- 9.14 The creation of habitat post-development is outlined in Table 7. Developed land; sealed surface, Modified grassland, Other neutral grassland, Introduced shrub and Urban trees will be created post development on the Application Site as part of the post development layout as shown in Figure 3. comprising 0.15ha in total. An area of 0.026ha of developed land; sealed surface will be created, 0.002ha of introduced shrub, 0.072ha of modified grassland and five small trees will be planted, accounting for 0.02ha. The creation of these habitats will deliver 0.32 AHBU.

Table 7. Habitats to be Created

Habitat Type	Area (ha)	Units
Developed land; sealed surface	0.026	0.00
Modified Grassland	0.072	0.13
Other neutral grassland	0.033	0.12
Introduced shrub	0.002	0
Urban Tree	0.02	0.06
TOTAL	0.15*	0.32

*Rounded in metric

Developed land; sealed Surface

- 9.15 The urban habitat type (Very low distinctiveness, no condition) to be created is the proposed pathways to the new entrance of the abbey and is 0.026ha of developed land sealed surface.

Modified Grassland

- 9.16 Modified Grassland is to be recreated after the loss to construction disturbance surrounding the proposed pathways and accounts for 0.072ha and generates 0.13 AHBU. The grassland will be Poor quality and Low distinctiveness.

Other Neutral Grassland

- 9.17 An area of Other neutral grassland will be created to the area north of the proposed southern pathway. Comprising 0.033ha, this will achieve a Poor quality and Medium distinctiveness. The grassland will generate 0.12 AHBU

Introduced Shrub

- 9.18 Introduced shrub will be created along the new southern pathway and account for 0.02ha. Introduced shrub is automatically assigned Poor quality and a Low distinctiveness and does not deliver any AHBU.

Urban trees

- 9.19 A total of five small native trees of poor quality are to be planted to the southern pathway, providing 0.06 AHBU from 0.02ha.
- 9.20 Post development, habitat creation is predicted to generate 0.32 AHBU, generated from the planting of small urban trees. All habitat creation will be started and complete in the same year as construction. The development is predicted to result in an 12.96% net gain in AHBU post development.

10 Enhancement Recommendations

- 10.1 The NPPF requires that the local planning authority should aim to enhance biodiversity when determining planning applications and opportunities to incorporate biodiversity in and around developments should be encouraged.

- British Standard 42021:2022 Integral Nest Boxes selection and installation for new developments – specification recommends:
 - The number of integral boxes in housing developments – is at least one per residential unit on average.
 - The numbers of the above installed in larger buildings – to be proportionate to the mass and design; there is not necessarily an upper limit.
 - In all but exceptional circumstances the entrance holes of all integral boxes should be 30mm x 65mm minimum to enable starlings to enter, note swift

boxes are considered universal as they are also used by sparrows and starling and other small birds.

- The entrance hole should be located close to the base of the box to avoid birds becoming trapped within.
 - Therefore, there will be a total of 1 bird nesting box installed across this site, to either a mature tree or the abbey building. This will provide additional nesting/roosting opportunities. The placement of these will be designed to encourage use of new habitat features that result from the development.
- 10.2 A total of two Schwegler 2F Bat Box will be installed to two trees on site. These will be installed at a height of at least 3m, with an unobstructed access point and on a southerly aspect where possible, facing away from the prevailing winds.

11 Conclusion

- 11.1 Ecological surveys did not confirm presence of protected species and site and habitat assessments class the site as having low suitability for supporting protected species. Measures detailed in Section 8 will mitigate the loss of habitat to protected species, potential for injury to reptiles and GCN. However, a precautionary approach will be taken. These measures will ensure there is no significant negative impact to the protected species on site and the proposed development will result in a significant positive impact to such species.
- 11.2 In the context of relevant biodiversity legislation, providing the further surveys detailed in Section 9 and any subsequent recommendations are conducted, the approved development will remain compliant with relevant biodiversity legislation.
- 11.3 Section 10 provides enhancement opportunities, which, in line with Chapter 15 of the NPPF, will enhance the biodiversity of the site and offer opportunities for a wide range of species including invertebrates, birds and bats.
- 11.4 The net gain assessment for habitats confirms that the loss of 0.13ha of modified grassland will be offset with the planting of 5 small trees and the creation of 0.072ha of Modified grassland and 0.033ha of Other neutral grassland. This results in 12.96% increase in net gain.
- 11.5 Biodiversity Net Gain for development is a legal requirement, mandated in February 2024 for major developments and April 2024 for minor developments, with a minimum of 10% net gain required.

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Appendix 1 Level of Importance

Geographic Scale	Example
International	An internationally designated site¹, or site which would meet the criteria for such a designation. A viable area of Annexe 1 habitat type, or smaller area essential to maintain the viability of a larger whole. Any regularly occurring population of an internationally important species, threatened or rare in the UK. A regularly occurring, nationally significant population/ number of any internationally important species.
National	A nationally designated site², or site which would meet the criteria of such a designation. A viable area of a Habitat of Principal Importance and priority habitats in England (NERC Act 2006) or smaller areas essential to maintain the viability of a larger whole. Any regularly occurring, regionally or county significant population/number of any nationally important species. A feature identified as of Habitat or Species of Principal Importance or Priority habitats
Regional	Sites which exceed the County-level designations but fall short of SSSI selection guidelines. Viable areas of key habitat identified in the Regional BAP or smaller areas essential to maintain the viability of a larger whole. Viable areas of key habitat of Regional value in the appropriate Natural Area profile. Any regularly occurring, locally significant population of a species nationally scarce which occurs in 16-100 10km squares in the UK or in a Regional BAP or relevant Natural Area on account of regional rarity or localisation. A regularly occurring, locally significant number of a regionally important species.
Metropolitan, County, Vice County	Semi-natural ancient woodland greater than 0.25ha. County/Metropolitan sites which meet the published ecological selection criteria for designation, including Local Nature Reserves (LNR) selected on County/Metropolitan ecological criteria. A viable area of Habitat of Principle Importance and Priority Habitats in England (NERC) A regularly occurring, locally significant population of a

Geographic Scale	Example
	County/Metropolitan “red data book” or LBAP species on account of regional rarity or localisation. A regularly occurring, locally significant number of a County/Metropolitan important species.
District	Semi-natural ancient woodland smaller than 0.25 ha. Areas of habitat identified in a sub-county (District/Borough) BAP or in the relevant Natural Area profile. District sites that meet the published ecological selection criteria for designation, including LNR selected on District/Borough ecological criteria. Sites/features scarce within the District/Borough. A diverse and/or ecologically valuable hedgerow network. A population of a species that is listed in a District/Borough BAP because of its rarity in the locality or in the relevant Natural Area profile because of its regional rarity or localisation. A regularly occurring, locally significant number of a District/Borough important species during a critical phase of its life cycle.
Local	Areas of habitat considered to appreciably enrich the habitat resource within the context of the parish or neighbourhood (e.g. species-rich hedgerows); and LNRs selected on parish ecological criteria.

¹ Such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or, Wetlands of International Importance (RAMSAR)

² Such as Site of Special Scientific Interest (SSSI)

Appendix 2 Relevant Legislation

Species	Legal Protection
Bats, Dormice, GCN	All British species of bats, GCN and dormice and their resting and breeding sites, have legal protection under UK and European law (Wildlife and Countryside Act (WCA) 1981 (as amended), and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019) It is an offence to: • capture, kill, disturb or injure a dormouse • damage or destroy a breeding or resting place • obstruct access to their resting or sheltering places • possess, sell, control or transport live or dead individuals, or parts of them
Badgers	Badgers, and their setts, are protected in the UK under the Protection of Badgers Act 1992. It is an offence to: • intentionally capture, kill or injure a badger • damage, destroy or block access to their setts • disturb badgers in setts • treat a badger cruelly • deliberately / intentionally allow a dog into a sett • bait or dig for badgers
Reptiles	All common reptiles are protected from killing or injury under the WCA 1981, as amended.
Birds	All active bird nests are protected under the WCA 1981, as amended from damage/destruction. Furthermore, birds that are listed on Schedule 1 of the Act are also protected from disturbance while they are nesting.

Invasive Plants	Species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) are considered to be invasive. It is an offence to plant or cause these species to grow in the wild.
Protected plants, fungi or lichens	For plants, fungi or lichens listed on Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) it is an offence to intentionally pick, uproot, or destroy them, unless it could not be reasonably avoided (e.g. the incidental result of a lawful action).
Section 41 Priority Species	Regard must be given to the conservation of species listed as rare and threatened species under Section 41 of the Natural Environment and Rural Communities Act (2006) when making planning decisions.

Appendix 3 Habitat Suitability Index Results

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Pond no.	SI ₁		SI ₂		SI ₃		SI ₄		SI ₅		SI ₆		SI ₇		SI ₈		SI ₉		SI ₁₀		Product	HSI	Suitability
	Location		Pond Area		Pond Drying		Water Quality		Shade		Fowl		Fish		Ponds		Terrestrial Habitat		Macrophytes				
On site pond	Zone A	1	<50m2	0.05	Dries Annually	0.1	Moderate	0.67	96-100%	0.2	Absent	1	Absent	1	>12	1	Poor	0.33	16-20%	0.5	0.00011	0.4021	Poor

Appendix 4 National Planning Policy Framework (NPPF) Chapter 15

“The NPPF requires that the local planning authority should aim to enhance biodiversity when determining planning applications, and opportunities to incorporate biodiversity in and around developments should be encouraged, especially where this can secure measurable net gains for the environment. Chapter 15 “Conserving and enhancing the natural environment, paragraphs 187-199”; states that this should be achieved by:

187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
- e) *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁶⁵; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for

the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

⁶²*Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.*

189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁶⁶. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

⁶⁶ *English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matters.*

190. When considering applications for development within the National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁷ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for development, including in terms of any national considerations and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effects to the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

⁶⁷ *For the purposes of paragraphs 190 and 191, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.*

Habitats and Biodiversity

192. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶⁸; wildlife corridors and stepping*

stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶⁹; and;

- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

⁶⁸ Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

⁶⁹ Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

193. When determining planning applications, local planning authorities should apply the following principles:

- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the Site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁷⁰ and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."

⁷⁰ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

194. The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites⁷¹; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

⁷¹ Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.

195. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site. “

13.1 In addition, this chapter of the NPPF covers ground conditions and pollution, paragraphs directly relevant to biodiversity are summarised below.

196. Planning policies and decisions should ensure that:

- a) a site is suitable for its proposed use by taking account of ground conditions and risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);

198. Planning policies and decisions should also ensure that the new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise for the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise and new development – and avoid noise giving rise to significant adverse impacts of health and the quality of life⁷²;
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

⁷² See Explanatory Note to the Noise Policy Statement for England (Department for Environment, Food & Rural Affairs, 2010).

199. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

⁶² Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.

Appendix 5 Biodiversity Net Gain Metric 4.

Existing area habitats			Distinctiveness	Condition	Strategic significance	Required Action to Meet Trading Rules	Ecological baseline						
Habitat Type	Irreplaceable habitat	Area (hectares)	Distinctiveness	Condition	Strategic significance		Total habitat units	Area retained	Area enhanced	Baseline units retained	Baseline units enhanced	Area habitat lost	Units lost
Urban tree	No	0.0386	Medium	Poor	Area/compensation not in local strategy/ no local strategy	Same broad habitat or a higher distinctiveness habitat required (2)	0.13	0.0386		0.13	0.00	0.00	0.00
Developed land, sealed surface	No	0.6376	V Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	Compensation Not Required	0.00	0.6376		0.00	0.00	0.00	0.00
Modified grassland	No	0.1329	Low	Poor	Area/compensation not in local strategy/ no local strategy	Same distinctiveness or better habitat required (2)	0.27	0		0.00	0.00	0.13	0.27
		Total habitat area	0.80				0.40	0.67	0.00	0.13	0.00	0.13	0.27
		Site Area (Excluding area of individual trees, green walls, intertidal hard structures)	0.77					Total area lost (excluding area of individual trees, green walls and intertidal hard structures)					0.13

Post intervention habitats										
Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness	Condition	Strategic significance		Temporal multiplier		Difficulty	Habitat units delivered
			Distinctiveness	Condition	Strategic significance	Standard or adjusted time to target condition	Final time to target condition (years)	Final difficulty of creation		
Urban	Developed land; sealed surface	0.0255	V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	1	Low	0.00	
Individual trees	Urban tree	0.0204	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	Check details- Delay in starting habitat in required condition? Δ	28	Low	0.06	
Urban	Introduced shrub	0.002	Low	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	Check details- Delay in starting habitat in required condition? Δ	2	Low	0.00	
Grassland	Modified grassland	0.0715	Low	Poor	Area/compensation not in local strategy/ no local strategy	Check details- Delay in starting habitat in required condition? Δ	2	Low	0.13	
Grassland	Other neutral grassland	0.0334	Medium	Poor	Area/compensation not in local strategy/ no local strategy	Check details- Delay in starting habitat in required condition? Δ	3	Low	0.12	
		</								

Appendix 6 Site photographs















