

Biodiversity Net Gain Assessment: Design Stage

October 2025

**Rocky Lane,
Haywards Heath**

Prepared by
CSA Environmental

On behalf of
Cross Homes (Sussex) Ltd

Report No: CSA/7606/03

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EXECUTIVE SUMMARY

Residential development of an apartment block comprising six dwellings is proposed at Rocky Lane, Haywards Heath. Detailed planning permission is sought from Mid Sussex District Council which will be subject to the Biodiversity Gain Condition in accordance with paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990.

CSA Environmental was instructed by Cross Homes (Sussex) Ltd to undertake a 'Design Stage' Biodiversity Net Gain Assessment (BNGA) of the proposed development. The Statutory Biodiversity Metric Calculation Tool was used to determine pre- and post- development biodiversity values, and predict the net effect of the proposed development upon biodiversity.

Baseline habitats at the Site comprise other neutral grassland and broadleaved woodland (moderate distinctiveness) alongside modified grassland and bramble scrub (low distinctiveness). No irreplaceable habitats are found on-site.

Post-development habitats at the Site will comprise a new apartment block and access road alongside retained woodland, modified grassland and other neutral grassland with new tree planting.

A net gain of biodiversity is predicted for the proposed development of 0.07 Habitat Units (15.99%). This is subject to retention of existing habitats outside of the development footprint and planting of 15 new individual trees.

Subject to securing the above through relevant legal mechanisms the Biodiversity Gain Condition could be discharged following grant of consent through submission of a Biodiversity Gain Plan.

To assist Mid Sussex District Council in their consideration of BNG and the proposed development, relevant statements have been set out in Box 1 and 2 in respect of applicable BNG policy and legal requirements.

Box 1. Biodiversity Net Gain Statements
Planning permission sought for the development, if granted, would be subject to the Biodiversity Gain Condition as set out within paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 given the following: • Planning permission is applied for after 12 February 2024/02 April 2024 ('small sites') • Planning permission does not relate to development consented prior to 12 February 2024 ('major developments') • Impacts to habitats are predicted on-site that either exceed 25 square metres per 5 linear metres with a value greater than zero, and/or impacts to any 'Section 41' habitat of principal importance • Planning permission sought does not relate to a 'householder application' or 'the high-speed railway transport network' • Planning permission is not for self-build or custom housebuilding and relates to more than 9 dwellings and/or proposals cover over 0.5ha • Planning permission does not relate directly to off-site gain developments to fulfil other BNG requirements
The biodiversity value of on-site habitats set out herein relate to the date of the planning application and not an earlier date.
The biodiversity value of on-site habitats set out herein are not lower than on date of application.
On-site biodiversity gain proposed herein is significant based upon the following: • Proposed habitats include those of medium distinctiveness, comprising mixed scrub, broadleaved woodland and other neutral grassland.
The Site does not contain irreplaceable habitat as defined under the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024).
As set out herein measures have been taken in a step-wise fashion in accordance with the Biodiversity Gain Hierarchy to: • First avoid adverse effects of the development upon on-site medium or higher distinctiveness habitat and, where they cannot be avoided, mitigate these effects; • Taking an approach to first seek on-site habitat enhancement, then habitat creation • Where above cannot fully compensate, seek registered off-site gains • And finally, where off-site gains cannot be secured, seeking purchase of biodiversity credits

Box 2. Accordance with 'Biodiversity Net Gain: Good Practice Principles for Development' (Baker et al., 2019).	
Principle 1. Apply the 'Mitigation Hierarchy'	Designs decisions have been documented within the prepared PEA, with due consideration for the CIEEM Guidelines for Ecological Impact Assessment (EcIA) (CIEEM, 2018) including mitigation hierarchy. Trading rules have been accorded with in the prepared metric and ecologically justified decisions have been taken in respect of proposed habitats.
Principle 2. Avoid losing biodiversity which cannot be offset by gains elsewhere (e.g., irreplaceable habitats).	No ancient woodland habitats are present on-site and those nearby have been protected from loss or deterioration through indirect impact pathways. Notable habitats and features (Including broadleaved woodland and other neutral grassland) have been prioritised for protection as part of the proposed design.
Principle 3. Be inclusive & equitable	Design decisions taken have considered wider stakeholders including local nature conservation groups, existing and new residents. Open space design has sought to balance biodiversity benefits and access to nature, with recreational uses and delivery of housing.
Principle 4. Address risks (e.g., difficulty of achieving habitat creation/enhancement)	A precautionary approach has been taken to grassland habitat type and condition for on-site biodiversity gain provision, with the highest provision comprising other neutral grassland in poor condition.
Principle 5. Make a 'measurable' Net Gain contribution (e.g., calculated using an appropriate metric).	The Statutory Biodiversity Metric has been used to demonstrate a clear and quantified calculation of the net effect of development upon biodiversity, using habitat as a proxy for wider biodiversity.
Principle 6. Ensure that Net Gain design achieves the best outcomes for biodiversity (quantitative and qualitative assessment) and create a net gain legacy for long-term benefits.	The decisions for design proposals have been subject to an iterative process with ecologists to ensure biodiversity is considered and the best outcomes for biodiversity are achieved.
Principle 7. Be additional Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).	Enhancements of habitats on-site, prioritising the planting of native species will provide better connectivity through the site and into the wider landscape than previous – creating additional niches for invertebrates, small mammals and reptiles and newts at the Site. Habitat creation and enhancement at the Site has been included as a betterment to the habitat at the Site, and not as compensation for protected species.
Principle 8. Create a Net Gain legacy Ensure Net Gain generates long-term benefits.	All habitats will be managed for at least 30 years to support long term benefits with interest of both nature and residents in mind.
Principle 9. Optimise sustainability Optimise the wider environmental benefits for a sustainable society and economy.	Amenity use habitats are designed to be low maintenance to reduce costs and the need for any pesticides.
Principle 10. Be transparent Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	An iterative approach has been used to inform the biodiversity net gain throughout the design of the Site. Inputs from stakeholders will be used to refine the approach as necessary through the planning process.

1.0 INTRODUCTION

- 1.1 This report has been prepared by CSA Environmental on behalf of Cross Homes (Sussex) Ltd and sets out the findings of a 'Design Stage' Biodiversity Net Gain (BNG) Assessment. Residential development is proposed at Kilnwood Apartments, Rocky Lane, Haywards Heath (hereafter 'the Site'). This report details the predicted net effect of the proposed development upon biodiversity.
- 1.2 This report has been prepared with due consideration for the Chartered Institute of Ecology and Environmental Management's guidance for design stage reporting on Biodiversity Net Gain (CIEEM, 2021). The report also takes into account wider CIEEM best-practice guidance (2017 & 2018), Biodiversity Net Gain: Good Practice Principles for Development (Baker et al., 2019) and the Biodiversity: Code of Practice for Planning and Development, published by the British Standards Institute (BS 42020:2013).
- 1.3 The Site occupies an area of c. 0.17ha and comprises broadleaved woodland (W1), neutral grassland (G1), modified grassland (G2), developed land (U1), and bramble scrub (S1) (see Habitats Plan in Appendix A). The Site is located around central grid reference TQ 32609 22373, to the south of Haywards Heath.
- 1.4 This report should be read in conjunction with the Preliminary Ecological Appraisal (PEA) (CSA/7606/01) prepared for the proposed development which provides full baseline habitat information upon which the post-development biodiversity value set out herein is based.
- 1.5 This 'Design Stage' BNG Assessment aims to:
 - Confirm whether planning permission sought for the development, if granted, would be subject to the Biodiversity Gain Condition as set out within paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 [see Box 1].
 - Provide information about "...the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat". Furthermore, evidence is provided as to how the Biodiversity Gain Hierarchy, as set out in as set out in Article 37A of the Town and Country Planning (Development Management Procedure) (England) Order 2015, has been applied.
 - Establish the following using the Statutory Biodiversity Metric Calculation, which uses habitat as a proxy for biodiversity and comprises three separate modules (Habitat Units, Hedgerow Units & Watercourse Units):
 - 'pre-development' (baseline) biodiversity value of the Site
 - 'post-development' (post-intervention) biodiversity value of the Site

- Any off-site biodiversity values (baseline & post-intervention)
 - Net effect of the proposed development
 - Whether relevant 'trading' rules and other controls have been accorded with
 - Whether the Biodiversity Gain Objective (10%) is met or not
 - State whether "...the biodiversity value of the on-site habitat will be lower on the date of application (or an earlier date) because of the carrying on of activities ('degradation') in which case the value is to be taken as immediately before the carrying on of the activities, and if degradation has taken place supporting evidence of this".
 - State whether any on-site biodiversity provision is 'significant' and if so, how the specific gains would be secured for 30 years, in accordance with Paragraph 9, Schedule 7A of the Town & Country Planning Act (1990).
 - Confirm the presence and location of any irreplaceable habitat at the Site, as set out in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024).
 - Clearly identify any assumptions made or deviation from the Statutory Biodiversity Metric Guidance.
 - Detail any legal frameworks for how Biodiversity Net Gain would be secured subject to grant of planning permission.
- 1.6 In accordance with Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 the following drawings have also been prepared:
- Baseline Habitats Plan (CSA/7606/107) provided in Appendix A
 - Proposed Habitats Plan (CSA/7606/108) provided in Appendix B
- 1.7 A final Biodiversity Gain Plan would be prepared to discharge the Biodiversity Gain Condition following the grant of any relevant consent.

2.0 PLANNING POLICY & LEGISLATION

- 2.1 The following legislation brings into force Schedule 14 of the Environment Act (2021), making Biodiversity Net Gain (BNG) a condition of planning permission in England from 12 February 2024:
- The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024
 - The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2024
 - The Biodiversity Gain Site Register Regulations 2024
 - The Biodiversity Gain Requirements (Exemptions) Regulations 2024
 - The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024
 - The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024
 - The Environment Act 2021 (Commencement No. 7) Regulations 2023
 - The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024
- 2.2 The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2024 (amended 2025) sets out existing government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, paragraph 187, states that the planning system and planning policies should minimise impacts on and provide net gains for biodiversity.
- 2.3 Accompanying the NPPF, central government guidance on the implementation of planning policies is set out within online Planning Practice Guidance (PPG). That relating to the protection and enhancement of the Natural Environment was most recently updated in February 2025. The Natural Environment PPG addresses principles across a broad spectrum of topics targeting biodiversity conservation, from individual site and species protection through to the supporting of ecosystem services, and the use of local ecological networks to support the national Nature Recovery Network. In particular, the PPG promotes the delivery of measurable Biodiversity Net Gain through the creation and enhancement of habitats alongside development. The PPG also includes a section on Biodiversity Net Gain, which forms part of a suite of guidance in the Government's Biodiversity Net Gain Collection.
- 2.4 The following policies from the Mid Sussex District Plan (adopted 2018) makes reference to biodiversity and the protection and enhancement of priority habitats and species:

Policy DP37: Trees, Woodland and Hedgerows

"The District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. In particular, ancient woodland and aged or veteran trees will be protected.

Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/or that have landscape, historic or wildlife importance, will not normally be permitted.

Proposals for new trees, woodland and hedgerows should be of suitable species, usually native, and where required for visual, noise or light screening purposes, trees, woodland and hedgerows should be of a size and species that will achieve this purpose.

Trees, woodland and hedgerows will be protected and enhanced by ensuring development:

- incorporates existing important trees, woodland and hedgerows into the design of new development and its landscape scheme; and*
- prevents damage to root systems and takes account of expected future growth; and*
- where possible, incorporates retained trees, woodland and hedgerows within public open space rather than private space to safeguard their long-term management; and*
- has appropriate protection measures throughout the development process; and*
- takes opportunities to plant new trees, woodland and hedgerows within the new development to enhance on-site green infrastructure and increase resilience to the effects of climate change; and*
- does not sever ecological corridors created by these assets.*

Proposals for works to trees will be considered taking into account:

- the condition and health of the trees; and*
- the contribution of the trees to the character and visual amenity of the local area; and*
- the amenity and nature conservation value of the trees; and*
- the extent and impact of the works; and*
- any replanting proposals.*

The felling of protected trees will only be permitted if there is no appropriate alternative. Where a protected tree or group of trees is felled, a replacement tree or group of trees, on a minimum of a 1:1 basis and of an appropriate size and type, will normally be required. The replanting should take place as close to the felled tree or trees as possible having regard to the proximity of adjacent properties. Development should be positioned as far as possible from ancient

woodland with a minimum buffer of 15 metres maintained between ancient woodland and the development boundary."

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. Valued soils will be protected and enhanced, including the best and most versatile agricultural land, and development should not contribute to unacceptable levels of soil pollution. Geodiversity will be protected by ensuring development prevents harm to geological conservation interests, and where possible, enhances such interests. Geological conservation interests include Regionally Important Geological and Geomorphological Sites."

3.0 METHODS

Biodiversity Calculations

- 3.1 The Statutory Biodiversity Metric (Defra, 2024) was used to determine baseline (pre-development) and post-intervention (post-development) biodiversity values, and to calculate the net effect of the development upon biodiversity. Specifically, the Statutory Biodiversity Metric Calculation Tool was populated and used to run all calculations present herein, and in accordance with the Statutory Metric User Guide (Defra, 2024).
- 3.2 The Statutory Biodiversity Metric uses habitat (vegetation and edaphic conditions) as a proxy for measuring biodiversity more widely. This reductive approach allows for the relative biodiversity 'value' of land to be calculated and expressed as transferrable 'Biodiversity Units'. The metric adopts the UK Habitat Classification (UK Hab; Butcher et al., 2023) system with some minor deviation.
- 3.3 The metric consists of a primarily 'Area' module which calculates 'Habitat Units' such as grassland, woodland and urban habitats. The separate Biodiversity Unit types cannot be converted between these modules and are addressed separately herein. For the purposes of this report hedgerows and watercourses modules were not populated given the absence of these linear features from the Site.
- 3.4 'Habitat trading' controls are integrated into the Statutory Metric to ensure any losses of habitat are mitigated or compensated for appropriately, in respect of conservation priorities and ecological functionality. Any deviation from habitat trading is cleared flagged within the Statutory Metric, and justifications, where necessary, are set out herein.
- 3.5 Any consideration of temporary impacts, those where habitats can be reinstated within 2 years of impacts as set out within the User Guide, will be explained in full herein.
- 3.6 A Statutory Biodiversity Metric Calculation Tool has been prepared for the proposed development and is provided separately in full for interrogation by Mid Sussex District council, relevant consultees and stakeholders.
- 3.7 All metric calculations have been reviewed by Jeff Turton ACIEEM who has completed numerous net gain assessments.

Baseline Habitats

- 3.8 The accompanying PEA report (CSA/7606/01) provides details of the UKHab survey undertaken at the Site on 02 May 2025 including full survey methods.
- 3.9 Baseline (pre-development) habitat areas and linear measurements were taken from the Baseline Habitats Plan (Appendix A) prepared in mapping software Quantum Geographic Information Systems (QGIS). Mapping is based upon field survey, topographical survey, aerial photography and OS mapping to an accuracy of c. 20m².

Habitat Condition Assessment

- 3.10 Detailed habitat condition assessments were undertaken on 26 June 2025 by Lucy Moorhouse (FISC Level 4) in accordance with the Statutory Metric User Guide (Defra, 2024). Published condition assessment templates have been completed and are provided in Appendix C alongside wider condition information.

Post-Development Habitats

- 3.11 Post-development habitat areas and linear measurements were taken from the Proposed Habitats Plan (Appendix B) prepared in mapping software QGIS. This plan is based upon the Proposed Site Plan DA2401-P-03 and Planting Plan hla 585 01 B prepared by Datum Architects. Wider consideration of construction methods, future land-use and management were used to determine the extent of existing habitat loss/deterioration, retention/enhancement and creation which would occur-post development.
- 3.12 Professional judgement was required throughout the calculation process to ensure target habitats were reasonable, achievable and ecologically justified. Habitat condition for both enhanced and created habitats was assigned taking a precautionary approach and with consideration of biotic and operational phase conditions (i.e. those which may limit the extent to which 'good' condition is likely to be reached).

Strategic Significance

- 3.13 A desktop assessment was undertaken to determine relevant strategic significance multipliers for pre- and post-development habitats in accordance with Table 7 of the Statutory Metric User Guide (Defra, 2024) with particular consideration of Local Nature Recovery Strategies (LNRS).

Additionality & Wider Considerations

- 3.14 In accordance with the good practice principles as set out above, the following additional considerations have been given:

- Wider consideration of ecological functionality, with a qualitative ecological assessment presented herein
- Consideration of non-ecological stakeholders, such as end-users (e.g. residents) of the scheme and choices with regard to access and multi-functionality
- Identification of opportunities to deliver wider environmental gain (e.g. carbon sequestration, water quality and climate resilience) guiding habitat/design choices beyond certain ecological outcomes

Assumptions & Limitations

- 3.15 Effort has been taken to ensure mapping, and measurements taken from mapping, are accurate to the level stated. However, given the nature of habitats, methods of field survey and the potential for inaccuracies in aerial photography and some other mapping, there remain some potential for errors in the calculations presented herein.
- 3.16 Professional judgement and a precautionary approach are required to establish baseline and post-development scenarios to assess current habitat type and condition, and to predict future changes. Accordingly outcomes for habitats and biodiversity more widely may differ from those presented herein.
- 3.17 Specific assumptions with regard to certain existing and proposed habitats have been identified where relevant throughout the report.

4.0 BASELINE BIODIVERSITY

- 4.1 For full habitat descriptions and species lists, please refer to the PEA (CSA/7606/01) with baseline habitats illustrated on the Habitats Plan (Appendix A). Appendix C sets out full details of habitat condition assessment including completed standard templates.

Strategic Significance

- 4.2 There is no published Local Nature Recovery Strategy (LNRS) for the Mid Sussex administrative area. The following relevant alternative documents have been reviewed in respect of significant strategic significance:
- Mid Sussex District Plan 2014-2031 (Mid Sussex District Council 2018)
 - Haywards Heath Town Council (2016) Neighbourhood Plan
 - Trees and Hedgerows Guidance (Mid Sussex District Council, 2025)
 - Sussex Nature Partnership (no date) Biodiversity Opportunity Areas
- 4.3 Based on the above, all baseline habitats were assigned as 'Low' strategic significance, due to the absence of a LNRS at the time of writing, the Site falling outside a BOA and because the Site is not within a National Habitat Network. No additional guidance on assigning strategic significance in this administrative area appears to be available at this time.
- 4.4 The above approach has also been adopted for post-intervention (post-development) habitat units as set out below.

Baseline Biodiversity Units

- 4.5 A summary of the on-site habitat areas and baseline Biodiversity Units, as calculated using the accompanying Statutory Biodiversity Metric are set out in Table 1 below.

Table 1. Summary of On-site Baseline Biodiversity Units

HABITATS		
Habitat Type (Assumed Condition)	Area (ha)	Habitat Units
Developed land; sealed surface	0.077	0.00
Modified grassland (moderate)	0.028	0.11
Other neutral grassland (poor)	0.048	0.19
Bramble scrub	0.007	0.03
Other woodland; broadleaved	0.009	0.07
Urban trees* (poor)	0.012	0.05
Total	0.17ha	0.45

*Area measurements attributed to 'individual trees' are not included in the total area as trees oversail other habitats.

- 4.6 A large proportion of the total Site area (45%) comprises 'very low' distinctiveness developed land (developed land; sealed surface). 'Low'

distinctiveness modified grassland accounts for approximately 17% of the Site area and 24% of the baseline biodiversity value. 'Medium' distinctiveness neutral grassland accounts for 28% of the Site area and 42% of the baseline biodiversity value. 'Medium' distinctiveness woodland accounts for 5% of the Site area and 16% of the baseline biodiversity value, while 'medium' distinctiveness bramble scrub accounts for 4% of the Site area and 7% of the baseline biodiversity value.

5.0 POST-INTERVENTION BIODIVERSITY

- 5.1 The proposed development comprises the construction of a single apartment block comprising 6 dwellings with associated private access infrastructure and Public Open Space.
- 5.2 The proposed scheme was subject to an iterative design process over May to September 2025 with the following specific aims and advice provided in accordance with the Biodiversity Gain Hierarchy:
- Avoid entirely direct losses or deterioration of the broadleaved woodland at the Site, through retention and enhancement of bramble scrub currently positioned to the south of the woodland.
 - Allow the retention of all other neutral grassland at the Site
 - Enhancement of scrub habitats alongside development
 - Introduction of more individual trees within the grassland
- 5.3 Post-intervention habitats are illustrated on the Proposed Habitats Plan in Appendix B. This drawing is based upon development parameters set out within the Proposed Site Plan DA2401-P-03 and Planting Plan hla 585 01 B prepared by Datum Architects. The following assumptions have been made with regard to these plans in line with the Statutory Metric User Guide (Defra, 2024) and professional judgement taking a precautionary approach where necessary:
- All individual trees are assumed to be 'small' in size, and in poor condition for 'urban'/street contexts and moderate condition for 'rural' contexts
- 5.4 On-site habitat retention, enhancement and creation set out below would be secured through control of detailed landscape design, a Habitat Management & Monitoring Plan (HMMP) and appropriate application of a planning condition or legal condition.

Habitat Retention & Enhancement

- 5.5 Proposals show the retention of approximately one third of habitats on-site, including the woodland to the north, neutral grassland to the south and enhancement of bramble scrub. Habitats lost at the Site include areas of modified grassland and bramble scrub surrounding the proposed development. Three 'small' (as defined in the Statutory Metric User Guide, Defra 2024) sycamore trees to the western Site boundary will be removed. The following habitats will be retained or enhanced:
- 0.048ha of neutral grassland retained in poor condition
 - 0.009ha of broadleaved woodland retained in moderate condition
 - 0.015ha of modified grassland retained in moderate condition
 - 0.004ha of bramble scrub retained and enhanced to mixed scrub in moderate condition by ensuring an absence of non-native invasive

species, providing a cover comprised of at least 80% native woody species, and developed a scattered edge bordered by tall grassland and scattered scrub

5.6 As set out within the accompanying EclA the retention of these habitats will require protections during construction and in operation through the following:

- Tree protection measures in line with standard arboricultural practice (BS5837: 2012)
- Construction Environmental Management Plan, to include standard pollution control measures to be implemented during construction

5.7 As set out within the Statutory Metric User Guide, where certain habitats can be reinstated to previous condition within 2 years of impact (i.e. temporary compound works), these are treated as 'retained'. This guidance applies to the modified grassland and bramble scrub adjacent to the proposed apartment unit; these habitats are likely to be disturbed during construction but are predicted to return to their baseline conditions within 2 years of impact.

Habitat Creation

5.8 Proposal schemes comprise the creation of additional developed land, in the form of the proposed apartment block and associated landscaping.

5.9 Tree planting to the south of the Site is proposed of 15 trees comprising native woody species to enable the full retention of neutral grassland and adherence to habitat trading rules. The trees are anticipated to reach 'poor' condition within 30 years.

Strategic Significance

5.10 An equivalent approach to strategic significance as been taken for post-intervention Biodiversity Units as for baseline units above, with all habitats having 'low' strategic significance.

Significant On-site Gain

5.11 The proposed habitat enhancement and creation proposals are unlikely to be deemed 'significant' by the Mid Sussex District Council due to the small nature of habitats proposed and their presence already on-site. Therefore, management of maintenance of created areas of habitat should be set out within a Landscape and Ecological Management Plan (LEMP), to be conditioned as part of planning.

6.0 NET EFFECT ON BIODIVERSITY

Biodiversity Units

- 6.1 The net effect on biodiversity as a result of the proposed development is set out within the accompanying Statutory Biodiversity Metric and summarised below in Table 2.

Table 2. Net Effect on Biodiversity: Habitat Units

	Habitat Units	% Change
On-site baseline	0.45	
On-site post-intervention	0.52	
Total net change	+0.07	+15.99%
<i>Trading Rules Satisfied</i>		

- 6.2 It is demonstrated that the proposed development will result in a net gain in excess of 10% for Habitat Units, with all relevant trading rules satisfied.

Habitat Coverage

- 6.3 The net change in cover for broad and priority habitat is summarised in Table 3 below.

Table 3. Net Effect Habitat Coverage

	Area (ha)/Length (km) change	% Change
Urban	+ 0.016 ha	+207%
Woodland	+/- 0.00 ha	0%
Grassland	- 0.013 ha	- 54%
Scrub	- 0.003 ha	-57%
Individual trees	+ 0.049 ha	+20%

- 6.4 The proposed development will result in the net loss of grassland and scrub habitats, alongside a significant increase in urban habitats within residential development parcels. However, although there is a decrease in area units of scrub, due to the enhancement of retained scrub there is an increase in habitat units in relation to this habitat type.
- 6.5 An increase in individual trees will be seen at the site due to the planning of 15 new trees within the modified grassland, resulting in an increase of 20% in this habitat category at the Site.

Qualitative Appraisal

- 6.6 A wider appraisal of the proposed development's effects upon biodiversity is set out below in Table 4 below. This includes factors not fully captured through the Statutory Biodiversity Metric, which uses only habitat type and condition as a proxy for biodiversity, omitting important factors such as connectivity and functioning of habitats.

Table 4. Qualitative Appraisal of effects upon Biodiversity

Ecological Features, Functions & Factors	Baseline Conditions	Potential Effects
Habitat Connectivity	Hardstanding at the Site contributes little to local ecological networks. Small areas of woodland, bramble scrub, neutral grassland and modified grassland create some ecological niches, with habitat connectivity between each parcel.	Residential development is mainly positioned on hardstanding with little ecological impact. There is a loss of a small area of modified grassland to accommodate the development, which could impede habitat connectivity through the Site. However, the retention of some modified grassland alongside all the neutral grassland will ensure habitat connectivity is maintained. New habitats to the peripheries of the Site, including enhanced scrub and individual trees provide some increase in habitat connectivity for birds, bats and badgers between the woodland and grassland contributing to wider ecological networks.
Structural Diversity	The Site has some habitat structure, with interfaces between woodland, bramble scrub and neutral grassland.	The proposed development's location on more urban habitats, such as developed land sealed surface and modified grassland means that all habitat interfaces are retained at the Site. Furthermore, the enhancement of the on-site scrub will increase suitability for species on-site and allow further dispersal into the wider landscape.
Habitat Mosaics	The Site has a moderate diversity of habitats, with woodland, scrub, neutral grassland and modified grassland.	Proposed development and habitats on-site will increase the number of habitat types and their structural diversity. The combination of grassland, scrub, trees and woodland will provide a medium-scale mosaic of habitat to benefit biodiversity.
Soil Biodiversity	A large proportion of the developable area currently comprises hardstanding. The remaining area is comprised of modified grassland which has some nutrient enrichment at present as a result of its use as an amenity space.	Residential development will include the loss and damage of soils within the modified grassland area to built form and will prevent natural functioning of this habitat. Soil habitats within the remainder of the site are anticipated to stay the same as current at the Site.

7.0 MANAGEMENT & MONITORING

7.1 Full details of management and monitoring for delivery of on-site biodiversity gains will be provided within a LEMP, to be conditioned as part of planning. This LEMP will include the following principal elements:

- Establishment and management of the following biodiversity gains:
 - Other neutral grasslands within informal open space
 - Enhancement of bramble scrub to mixed scrub
 - Additional tree planting within the neutral grassland
- Adaptive management options
- Monitoring regime and reporting process
- Roles and responsibilities

8.0 SUMMARY & CONCLUSIONS

- 8.1 Planning permission sought for the proposed development will be subject to the Biodiversity Gain Condition in accordance with Schedule 14 of the Environment Act (2021).
- 8.2 As set out herein, a net gain in biodiversity in excess of 10% is predicted as a result of the proposed development, based upon provision of significant on-site gains. The Statutory Biodiversity Metric Calculation Tool was used to calculate the following outcomes:
- +0.07 Habitat Unit gain or +15.99%
 - All relevant trading rules satisfied
- 8.3 Following any grant of planning permission an application to discharge the Biodiversity Gain Condition would be submitted completing the Biodiversity Gain Plan.
- 8.4 Management of areas of habitat retention and enhancement will be secured through a LEMP, to be conditioned as part of planning.

10.0 REFERENCES

Baker, J., 2016. *Biodiversity Net Gain: Good practice principles for development*. CIEEM, CIRIA & IEMA.

Baker, J., Hoskin, R., and Butterworth, T., 2019. *Biodiversity Net Gain: Good Practice Principles for Development. A practical guide*. CIEEM, CIRIA & IEMA.

Business and Biodiversity Offsets Programme (BBOP), 2018. *Business Planning for Biodiversity Planning: A Roadmap*. Available at: https://www.forest-trends.org/bbop_pubs/business-planning-bng [Accessed September 2025].

Butcher, B., Carey, P., Edmonds, R., Norton, L., and Treweek, J., 2023. *UK Habitat Classification Version 2.0* [pdf] UKHab Ltd. Available at <http://www.ukhab.org/> [Accessed September 2025].

Chartered Institute of Ecology and Environmental Management, 2017. *Guidelines for Ecological Report Writing*. Winchester: CIEEM.

Chartered Institute of Ecology and Environmental Management, 2018. *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.1*. Winchester: CIEEM.

Chartered Institute of Ecology and Environmental Management, 2021. *Biodiversity Net Gain Report and Audit Templates*. Winchester: CIEEM.

Defra, 2024. *The Statutory Biodiversity Metric User Guide*. London: Defra.

Gurnell, A., England, J., Scott, S. & Shuker, L., 2024. *A Guide to Assessing River Condition Part of the Rivers and Streams Component of the Biodiversity Metric Watercourse Module for calculating Biodiversity Net Gain*. Modular River Survey.

Ministry of Housing, Communities and Local Government, 2024 (updated 2025). *National Planning Policy Framework (NPPF)*. Ministry of Housing, Communities and Local Government.

Natural England, 2020. *National Habitat Network Maps; User Guide V.2*. Available at: https://magic.defra.gov.uk/Metadata_for_magic/Habitat%20Network%20Mapping%20Guidance.pdf [Accessed September 2025].

Appendix A

Baseline Habitats Plan



- Site boundary
- Developed land; sealed surface (u1b)
- Modified grassland (g4)
- Other neutral grassland (g3c)
- Other woodland; broadleaved (w1g)
- Urban tree



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Project	Kilnwood Apartments, Rocky Lane, Haywards Heath	Date	July 2025	Drawing No.	CSA/7606/107
Drawing Title	Baseline Habitats Plan	Scale	1:781	Rev	-
Client	Cross Homes (Sussex) Ltd.	Drawn	SA	Checked	JT

Appendix B

Proposed Habitats Plan



- Site boundary
- Developed land; sealed surface (u1b)
- Mixed scrub (h3h)
- Modified grassland (g4)
- Other neutral grassland (g3c)
- Other woodland; broadleaved (w1g)
- Urban tree



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Project	Kilnwood Apartments, Rocky Lane, Haywards Heath	Date	July 2025	Drawing No.	CSA/7606/108
Drawing Title	Proposed Habitats Plan	Scale	1:781	Rev	-
Client	Cross Homes (Sussex) Ltd.	Drawn	SA	Checked	JT

Appendix C

Habitat & Hedgerow Condition Assessments

Habitat Condition Sheet: **GRASSLAND – MEDIUM, HIGH & VERY HIGH DISTINCTIVENESS**

Condition Assessment Criteria		Pass? (Y/N)
		Other Neutral Grassland (F1)
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type (and relative to suboptimal species which may be listed in the UKHab description). Note – this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	N
B	Sward height is varied (at least 20% of the sward is less than 7cm and at least 20% is more than 7cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Y
C	Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	N
D	Cover of bracken is less than 20% and cover of scrub (including bramble) is less than 5%.	N
E	Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species (as listed on Schedule 9 of WCA) are present, this criterion is automatically failed.	N
Additional Group (Non-acid types only)		
F	There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type. Note – this criterion is essential for achieving Good condition (non-acid grassland types only).	Y
Condition Assessment Result		
Acid Grassland Types (out of 5 criteria)		
Passes 5 criteria	Good (3)	
Passes 3 or 4 criteria	Moderate (2)	
Passes 2 or fewer criteria	Poor (1)	
Non-Acid Grassland Types (out of 6 criteria)		
Passes 5 or 6 criteria, including essential criteria A and F.	Good (3)	
Passes 3 - 5 criteria, including essential criterion A.	Moderate (2)	
Passes 2 or fewer criteria; OR Passes 3 or 4 criteria excluding essential criteria A and F.	Poor (1)	2 - Poor

Habitat Condition Sheet: **GRASSLAND – LOW DISTINCTIVENESS**

Condition Assessment Criteria		Pass? (Y/N)
		Modified Grassland (F2)
A	There are 6-8 vascular plant species per m ² present, including at least 2 forbs. Note – this criterion is essential for achieving Moderate or Good condition.	Y
B	Sward height is varied (at least 20% of the sward is less than 7cm and at least 20% is more than 7cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Y
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note – patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	N
D	Physical damage evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Y
E	Cover of bare ground between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	N
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Y
G	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Y
Condition Assessment Result		
Passes 6 or 7 criteria including essential criterion A	Good (3)	
Passes 4 or 5 criteria including essential criterion A	Moderate (2)	5 - Moderate
Passes 3 or fewer criteria; OR Passes 4 – 6 criteria (excluding criterion A)	Poor (1)	

Habitat Condition Sheet: **WOODLAND**

Condition Assessment Criteria					Score per indicator
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Broadleaved Woodland (W1)
A	Age distribution of trees	Three age-classes present.	Two age-classes present.	One age-class present.	2
B	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland.	Evidence of significant browsing pressure is present in less than 40% of whole woodland.	Evidence of significant browsing pressure is present in 40% or more of whole woodland.	2
C	Invasive plant species	No invasive species present in woodland.	<i>Rhododendron ponticum</i> or cherry laurel <i>Prunus laurocerasus</i> not present, and other invasive species <10% cover.	<i>Rhododendron</i> or cherry laurel present, or other invasive species ≥10% cover.	3
D	Number of native tree species	Five or more native tree or shrub species found across woodland parcel.	Three to four native tree or shrub species found across woodland parcel.	Two or less native tree or shrub species across woodland parcel.	3
E	Cover of native tree and shrub species	>80% of canopy trees and >80% of understory shrubs are native.	50 - 80% of canopy trees and 50 - 80% of understory shrubs are native.	<50% of canopy trees and <50% of understory shrubs are native.	3
F	Open space within woodland	10 - 20% of woodland has areas of temporary open space. Unless woodland is <10ha, in which case 0 - 20% temporary open space is permitted.	21 - 40% of woodland has areas of temporary open space.	<10% or >40% of woodland has areas of temporary open space. But if woodland <10ha has <10% temporary open space, please see Good category.	2
G	Woodland regeneration	All three classes present in woodland; trees 4 - 7 cm Diameter at Breast Height (DBH), saplings and seedlings or advanced coppice regrowth.	One or two classes only present in woodland.	No classes or coppice regrowth present in woodland.	2

H	Tree health	Tree mortality 10% or less, no pests or diseases and no crown dieback.	11% to 25% tree mortality and or crown dieback or low-risk pest or disease present.	Greater than 25% tree mortality and or any high-risk pest or disease present.	3
I	Vegetation and ground flora	Recognisable NVC plant community at ground layer present, strongly characterised by ancient woodland flora specialists.	Recognisable woodland NVC plant community at ground layer present.	No recognisable woodland NVC plant community at ground layer present.	1
J	Woodland vertical structure	Three or more storeys across all survey plots, or a complex woodland.	Two storeys across all survey plots.	One or less storey across all survey plots.	2
K	Veteran trees	Two or more veteran trees per hectare.	One veteran tree per hectare.	No veteran trees present in woodland.	1
L	Amount of deadwood	50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, branch stubs and stumps, or an abundance of small cavities.	Between 25% and 50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities.	Less than 25% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities.	1
M	Woodland disturbance	No nutrient enrichment or damaged ground evident.	Less than 1 hectare in total of nutrient enrichment across woodland area, and or less than 20% of woodland area has damaged ground.	1 hectare or more of nutrient enrichment, and or 20% or more of woodland area has damaged ground.	1
Total score (out of a possible 39)					26
Condition Assessment Result					
Total score >32 (33 to 39)	Good (3)				
Total score 26 to 32	Moderate (2)				Moderate
Total score <26 (13 to 25)	Poor (1)				

Habitat Condition Sheet: **INDIVIDUAL TREES**

Condition Assessment Criteria		Pass? (Y/N)
A	The tree is a native species (or at least 70% within the block are native species).	N
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y
C	The tree is mature (or more than 50% within the block are mature).	N
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	N
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	N
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y
Condition Assessment Result		
Passes 5 or 6 criteria	Good (3)	
Passes 3 or 4 criteria	Moderate (2)	
Passes 2 or fewer criteria	Poor (1)	2 - Poor
Tree Size – Diameter at Breast Height (DBH)		
S = Small (>7.5cm to ≤30cm) M = Medium (>30cm to ≤60cm) L = Large (>60cm to ≤90cm) VL – Very Large (>90cm)		



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