Biodiversity Net Gain Assessment: Design Stage

January 2026

75 Folder Lane, Burgess Hill Location

Prepared by
CSA Environmental

On behalf of
Talbot Developments (Sussex) Ltd

Report No: CSA/7716/03

CSA environmental

masterplanning | ecology | landscape | heritage

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

Report Reference	Revision	Date	Prepared by	Approved by	Comments
CSA/7716/03	-	28/11/2025	LM	JT	First issue
	A	05/01/2025	LM	JT	Off-site provision
	B	14/01/2026	NS	LM	Update client information

CONTENTS

Appendices

Appendix A: Baseline Habitats Plan

Appendix B: Proposed Habitats Plan

Appendix C: Habitat & Hedgerow Condition Assessments

EXECUTIVE SUMMARY

Residential development is proposed at 75 Folders Lane, Burgess Hill. Detailed planning permission is sought from Mid Sussex District Council which will be subject to the Biodiversity Gain Condition in accordance with Schedule 14 of the Environment Act (2021).

CSA Environmental was instructed by Talbot Developments (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 comprises a singular dwelling with associated hardstanding and modified grassland garden, alongside an area of other neutral grassland to the south and multiple sections of introduced shrub. No irreplaceable habitats are found on Site.

Post-development habitats at the Site will comprise four residential dwellings alongside vegetated gardens and associated hardstanding, with a small area of modified grassland and new tree planting.

Off-site Biodiversity Units will be delivered by Iford Biodiversity Project at land in Lewes, East Sussex (Biodiversity Net Gain Register reference numbers BGS-290224001 and BGS-101024005), comprising the creation of neutral grassland, and enhancement of lowland deciduous woodland.

Using a combination of on and off-Site units, a net gain of biodiversity can be delivered alongside the proposed development of 0.07 Habitat Units (10.29%) and 0.04 Hedgerow Units (10.51%). Biodiversity gains will be delivered through creation of modified grassland in 'poor' condition (0.01 habitat units) and the planting of four proposed trees in communal areas (0.05 habitat units). This will be delivered alongside the creation of neutral grassland and enhancement of lowland deciduous woodland habitats off-site.

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 template.

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 Schedule 14 of the Environment Act (2021) given the following: • Planning permission is applied for after 12 February 2024 • Planning permission does not relate to development consented prior to 12 February 2024 and subject to a 'Section 73' amendment, or comprise a Reserved Matters application pursuant to such consent • 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 not significant based upon the following: • Proposed habitats do not include those of medium and higher distinctiveness • Proposed habitats do not comprise large areas of low distinctiveness habitat
The Site does not contain irreplaceable habitat as defined under the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024).

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 old hedgerows and mature trees) 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.
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 modified 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 results of the BNG calculations detailed herein follow an iterative design process whereby the retention, enhancement, and protection of existing ecological features were advocated.
Principle 7. Be additional Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).	Areas of modified grassland to be managed by a management company were provided within the scheme which otherwise would have been excluded, providing some on-site resource for species such as reptils, and allowing tree planting which will in turn positively affect nesting birds and bat foraging.
Principle 8. Create a Net Gain legacy Ensure Net Gain generates long-term benefits.	The Management of on-site habitats will adhere to measures outlines in a Landscape and Ecological Management Plan
Principle 9. Optimise sustainability Optimise the wider environmental benefits for a sustainable society and economy.	The amenity habitats proposed, namely modified grassland, is designed to require low maintenance and reduce sots and the necessity for artificial treatments and pesticides
Principle 10. Be transparent Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	The net gain calculations detailed herein follow an iterative design process wherein stakeholders, including the client and off-site unit providers, were informed of all design decisions.

1.0 INTRODUCTION

1.1 This report has been prepared by CSA Environmental on behalf of Talbot Developments (Sussex) Ltd and sets out the findings of a 'Design Stage' Biodiversity Net Gain (BNG) Assessment. Residential development is proposed at 75 Folders Lane, Burgess Hill (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. 0.15ha and comprises a singular dwelling with associated hardstanding and modified grassland garden, alongside an area of other neutral grassland to the south and a section of introduced shrub. (see Habitats Plan in Appendix A). The Site is located around central grid reference TQ 32758 18116, to the south-east of Burgess Hill.

1.4 This report should be read in conjunction with the Preliminary Ecological Appraisal (PEA) (CSA/7617/01) 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 the Environment Act (2021) [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 the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024), 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 the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations (2024) the following drawings have also been prepared:

- Baseline Habitats Plan (CSA/7716/106) provided in Appendix A
- Proposed Habitats Plan (CSA/7716/108) 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

2.2 The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing & Communities, 2023) sets out existing government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, paragraph 180, 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 2024. 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.

2.4 The following policy from the Mid Sussex District Plan makes reference to biodiversity and the protection and enhancement of priority habitats and species:

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, as well as two linear modules for 'Hedgerow Units' (including lines of trees) and 'Watercourse Units' (including rivers, canals and ditches). The separate Biodiversity Unit types cannot be converted between these modules and are addressed separately herein. For the purposes of this report 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 are 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/7716/01) provides details of the UKHab survey undertaken at the Site on 29 July 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 5m.

Habitat & Hedgerow Condition Assessment

3.10 An assessment of habitat and hedgerow condition was undertaken on 29 July 2025 and 5 August 2025 by Lucy Moorhouse ACIEEM (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 D 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 prepared by Datum Architects (DA2509-P-05) on behalf of Talbot Developments (Sussex) Ltd. 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

Spatial Risk

3.15 When proposing off-site solutions to BNG, the Metric applies a 'Spatial Risk Multiplier'. The multiplier is based on whether the offset land is located within the same Local Planning Authority (LPA) or National Character Area (NCA) as the development site, or is "deemed to be sufficiently local, to the site of biodiversity loss". The off-site land in this case may or may not be within the Same LPA or NCA and therefore this multiplier may be necessary and where this is the case It will be applied in the metric calculator tool.

Assumptions & Limitations

3.16 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.

3.17 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.

3.18 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/7716/01) with baseline habitats illustrated on the Habitats Plan (Appendix A). Appendix D sets out full details of habitat condition assessment including completed standard templates.

Strategic Significance

4.2 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, 2025) with particular consideration of draft Local Nature Recovery Strategies including the draft West Sussex LNRS (2025) which is currently under consultation.

4.3 Based on the above, all of the baseline Habitat Units are assigned as 'Low' strategic significance.

4.4 The above approach has also been adopted for post-intervention (post-development) habitat units onsite, while the strategic significance for post-development offsite was determined by Iford Biodiversity Project.

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. These include Habitat and Hedgerow Units.

Table 1. Summary of On-site Baseline Biodiversity Units

HABITATS		
Habitat Type (Assumed Condition)	**Area (ha)**	**Habitat Units**
Developed Land, Sealed Surface	0.0892	0.00
Other Neutral Grassland (poor)	0.0165	0.07
Modified grassland (moderate)	0.0035	0.01
Modified grassland (good)	0.0376	0.23
Introduced shrub	0.0056	0.01
Urban tree (poor)	0.0041	0.02
Urban tree (moderate)	0.0163	0.13
Urban tree (good)	0.0204	0.24
Total	**0.16ha***	**0.71**
HEDGEROWS		
Hedgerow Type	**Length (km)**	**Hedgerow Units**
H1 Species-rich native hedgerow	0.037	0.30
H2 Non-native and ornamental hedgerow	0.012	0.01
H3 Non-native and ornamental hedgerow	0.016	0.02
H4 Non-native and ornamental hedgerow	0.024	0.02
Total	**0.09km**	**0.35**

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

4.6 The majority of the Site area (88%) comprises habitats of 'low' or 'very low' distinctiveness such as developed land, sealed surface, introduced shrub and modified grassland. A total of 12% of the site is covered by 'medium' distinctiveness habitat in the form of other neutral grassland. Individual trees which are counted as 'lost' within the metric due to their inclusion within gardens post-development are of 'medium distinctiveness' and accounted for the highest biodiversity value at the Site (57%).

5.0 POST-INTERVENTION BIODIVERSITY

5.1 The proposed development comprises the construction of four dwellings with associated private gardens, access infrastructure and small area of modified grassland with tree planting.

5.2 The proposed scheme was subject to an iterative design process over July to November 2025 with the following specific aims and advice provided in accordance with the Biodiversity Gain Hierarchy:

- Minimise necessary losses of hedgerows wherever possible by keeping them within land to be controlled under a management company.
- Planting of new trees within the proposed development in order to provide new bird nesting opportunities

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, Datum Architects (DA2509-P-05). 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 and creation set out below would be secured through a Landscape and Ecology Management Plan (LEMP) and appropriate application of a planning condition or legal condition.

Habitat Retention & Enhancement

5.5 All area habitats at the Site will be lost to development, principally comprised of developed land with some areas of scattered modified and other neutral grassland.

5.6 Although not retained within BNG due to their position within vegetated gardens meaning they cannot be secured, all trees at the Site will be retained, ensuring functionality for wildlife across the site is retained. These trees will be subject to protection during construction by the way of tree protection fencing, to be set out within a CEMP to be conditioned as part of the development.

5.7 A section of hedgerow H1 will be retained alongside the access road into the Site, while all other areas of hedgerow will either be lost or functionally lost due to their inclusions within vegetated gardens.

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

- Construction Environmental Management Plan, to include standard pollution control measures to be implemented during construction

Habitat Creation

5.9 As part of the proposed development a range of habitats will be created including residential dwellings and associated infrastructure, vegetated gardens and small areas of modified grassland with new tree planting.

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 No habitats currently present on-site are considered to contribute to significant on-site biodiversity gain.

5.12 In line with Paragraph 9, Schedule 7A of the Town & Country Planning Act (1990), no additional mechanisms such as planning conditions or legal agreements are required to secure habitat creation, enhancement, or long-term management, as no significant gains have been identified.

6.0 OFF-SITE BIODIVERSITY

6.1 Additional off-site land in Lewes, East Sussex, delivered by the Iford Biodiversity Project (hereafter referred to as the 'offset Site'), has been identified to deliver Biodiversity Units to be registered and allocated to the proposed development at the Site.

6.2 The offset Site is located around central grid reference TQ 3896 1104, to the west of Lewes, c. 15km from the Site. The offset Site occupies an area of c. 54.7ha and comprises lowland deciduous woodland, cropland, mixed scrub, and native hedgerow.

6.3 The following interventions completed within the offset Site will be used to achieve BNG targets:

- Enhancement of lowland mixed deciduous woodland to 'good' condition
- Creation of neutral grassland in 'good' condition
- Enhancement of a native hedgerow to a species-rich native hedgerow in 'good' condition

6.4 The offset Site is located in a strategically significant location as it falls within an area designated as an ACIB (SxBRC, 2025) and the Stanmer and Ditchling Downs BOA (Sussex Nature Partnership, no date). Iford Biodiversity Project have assigned the highest, "formally identified" strategic significance multiplier for enhanced and created habitats (strategic significance is 'low' at the baseline, in line with the Statutory Metric User Guide (Defra, 2025)).

6.5 Iford Biodiversity estate has been given a spatial risk category as 'compensation outside of LPA or NCA, but in neighbouring LPA or NCA', to reflect its position within the South Downs National Park LPA and South Downs NCA.

6.6 The above works will deliver the following Biodiversity Units as set out within the accompanying Statutory Metric:

- 1.79 units of lowland mixed deciduous woodland
- 0.52 units of neutral grassland
- 0.32 units of species-rich native hedgerow

6.7 The proposed works at the offset Site will be subject to registration via the Biodiversity Gain Site Register which will require preparation of a Habitat Management and Monitoring Plan (HMMP) setting out works required for 30 years and secured through appropriate legal mechanisms. Subject to this registration, Biodiversity Units delivered can be allocated to the proposed development as set out below.

7.0 NET EFFECT ON BIODIVERSITY

Biodiversity Units

7.1 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 Tables 2A and 2B.

Table 2A. Net Effect on Biodiversity: Habitat Units

	Habitat Units	**% Change**
On-site baseline	0.71	
On-site post-intervention	0.20	
On-site net change	-0.51	-71.62%
Off-site Baseline	1.54	
Off-site post-intervention	2.31	
Off-site net change	+0.77	+50.24%
Total net change	**+0.07**	**+10.29%**
Trading Rules Satisfied		

Table 2B. Net Effect on Biodiversity: Hedgerow Units

	Hedgerow Units	**% Change**
On-site baseline	0.35	
On-site post-intervention	0.22	
On-site net change	-0.13	-36.13%
Off-site Baseline	0.10	
Off-site post-intervention	0.32	
Off-site net change	+0.22	+221.69%
Total net change	**+0.04**	**+10.51%**
Trading Rules Satisfied/Not Satisfied		

7.2 It is demonstrated that the proposed development will result in a net loss for both Habitat Units and Hedgerow Units with relevant trading rules not currently satisfied.

Habitat Coverage

7.3 The net change in cover (area and linear) for broad and priority habitat is summarised in Table 3 below.

Table 3. Net Effect Habitat Coverage On-Site

Habitat type	**Area (ha)/Length (km) change**	**% Change**
Urban	+ 0.05 ha	-80%
Grassland	- 0.05 ha	+60%
Individual trees	-0.02 ha	- 50%
Non-native ornamental hedgerow	-0.01	-20%
Species-rich native hedgerow	-0.01	-50%

7.4 The proposed development will inevitably result in the net loss of grassland habitats and hedgerow, alongside an increase in urban habitats within residential development parcels.

Qualitative Appraisal

7.5 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	Isolated grassland and hardstanding at the Site contributes little to local ecological networks, with the exception of the small area of other neutral grassland to the site frontage.	Residential development will not have a significant impact on habitat connectivity through the Site due to its limited suitability at the outset. Garden habitats provide some ancillary benefits to certain mobile species, such as hedgehog and nesting birds.
Structural Diversity	The Site has very limited habitat structure with little or no interfaces between broad habitat types.	Proposed development and landscaping on-site will retain the structural diversity of habitat at the Site. New tree planting will create new opportunities for wildlife alongside retained and created hedgerows managed sensitively for biodiversity.
Habitat Mosaics	The Site has a very low diversity of habitats.	Proposed development will reduce the number of habits on-site. Nevertheless, it will increase the amount of native species planting, through irradiation of ornamental shrubs and planting of native trees species.
Soil Biodiversity	The site is likely subject to some chemical inputs at the moment, specifically in modified grassland areas. The soil biota is likely to be significantly impacted by such management, reducing soil carbon, other nutrient cycling and wider environmental benefits.	Residential development will include the loss and damage of soils to built form and will prevent natural functioning of this habitat. Where areas of grassland are created or included within gardens, benefits are anticipated to soil environments and biodiversity.

8.0 MANAGEMENT & MONITORING

8.1 Full details of management and monitoring for delivery of on-site biodiversity gains will be provided within a Landscape and Ecological Management Plan (LEMP) for a 30-year period. This LEMP will include the following principal elements:

- Establishment and management of the following biodiversity gains:
    - Management of modified grassland areas
    - Retention of native species hedgerow
    - Planting of new individual trees
- Adaptive management options
- Monitoring regime and reporting process
- Roles and responsibilities
- Processes to ensure remedial measures can be undertaken in the event that target habitat or condition is not achieved

8.2 Off-site biodiversity gains will be required, to be appropriately registered through the Biodiversity Gain Register and subject to separate management and monitoring through an off-site HMMP, which will include/includes the following principal elements:

- Establishment and management of any habitats created or enhanced
- Adaptive management options
- Monitoring regime and reporting process
- Roles and responsibilities
- Processes to ensure remedial measures can be undertaken in the event that target habitat or condition is not achieved

9.0 SUMMARY & CONCLUSIONS

9.1 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).

9.2 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 off-site biodiversity delivery through the Iford Biodiversity Project. The Statutory Biodiversity Metric Calculation Tool was used to calculate the following outcomes:

- +0.07 Habitat Unit gain or +10.29%
- +0.04 Hedgerow Unit gain or +10.51%
- All relevant trading rules satisfied

9.3 Following any grant of planning permission an application to discharge the Biodiversity Gain Condition would be submitted completing the Biodiversity Gain Plan provided in draft in Appendix C.

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 November 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 November 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.

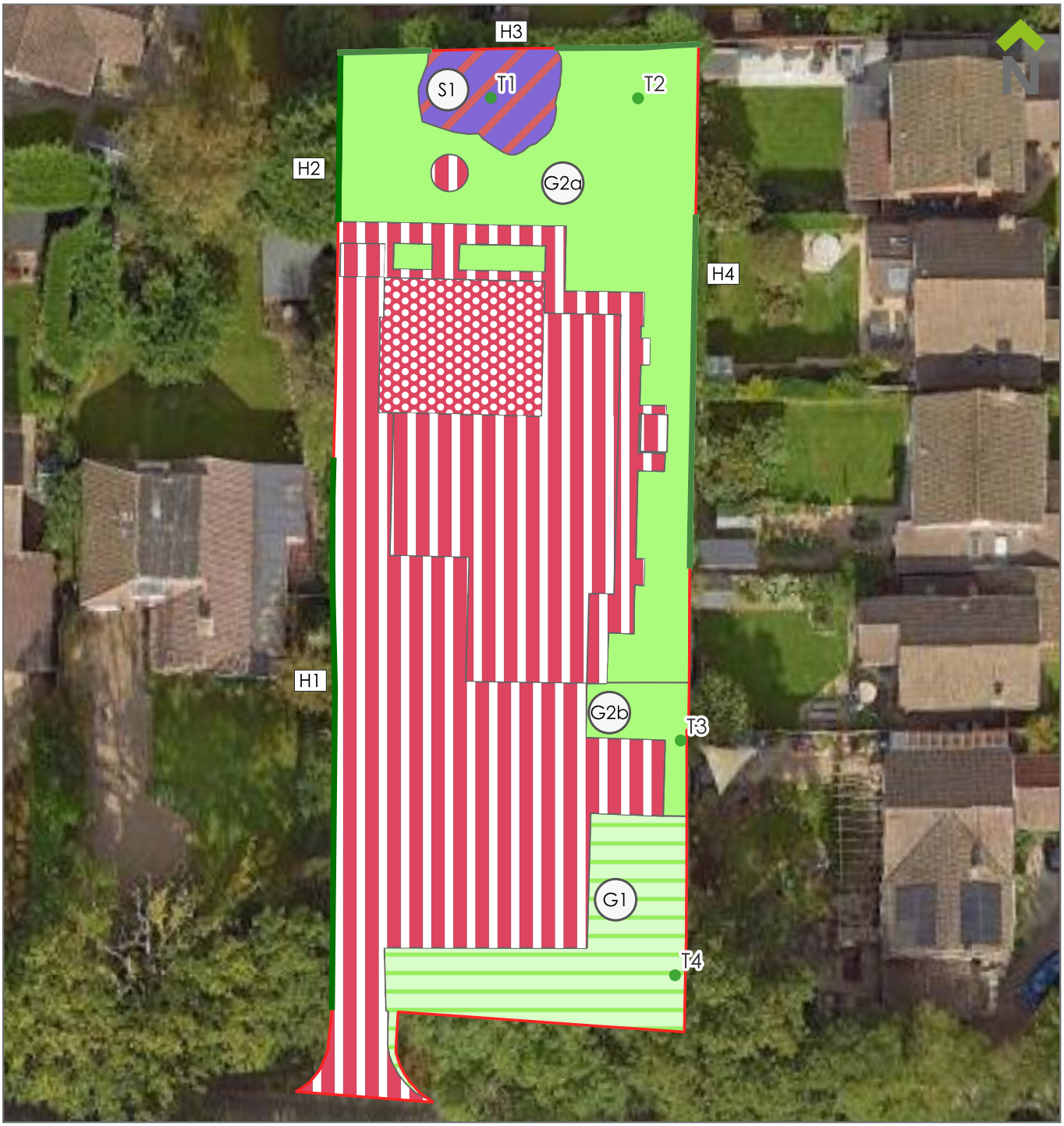
Department for Levelling Up, Housing & Communities, 2023. *National Planning Policy Framework (NPPF)*. London: Department for Levelling Up, Housing & Communities.

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.

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 November 2025].

Appendix A

Baseline Habitats Plan



- Site boundary
- Other neutral grassland
- Modified grassland
- Introduced shrub
- Developed land, sealed surface
- Artificial unvegetated unsealed surface
- Species-rich native hedgerows
- Non-native and ornamental hedgerow
- Individual trees
- Field reference
- Hedgerow reference

0 10 20 m

CSA environmental

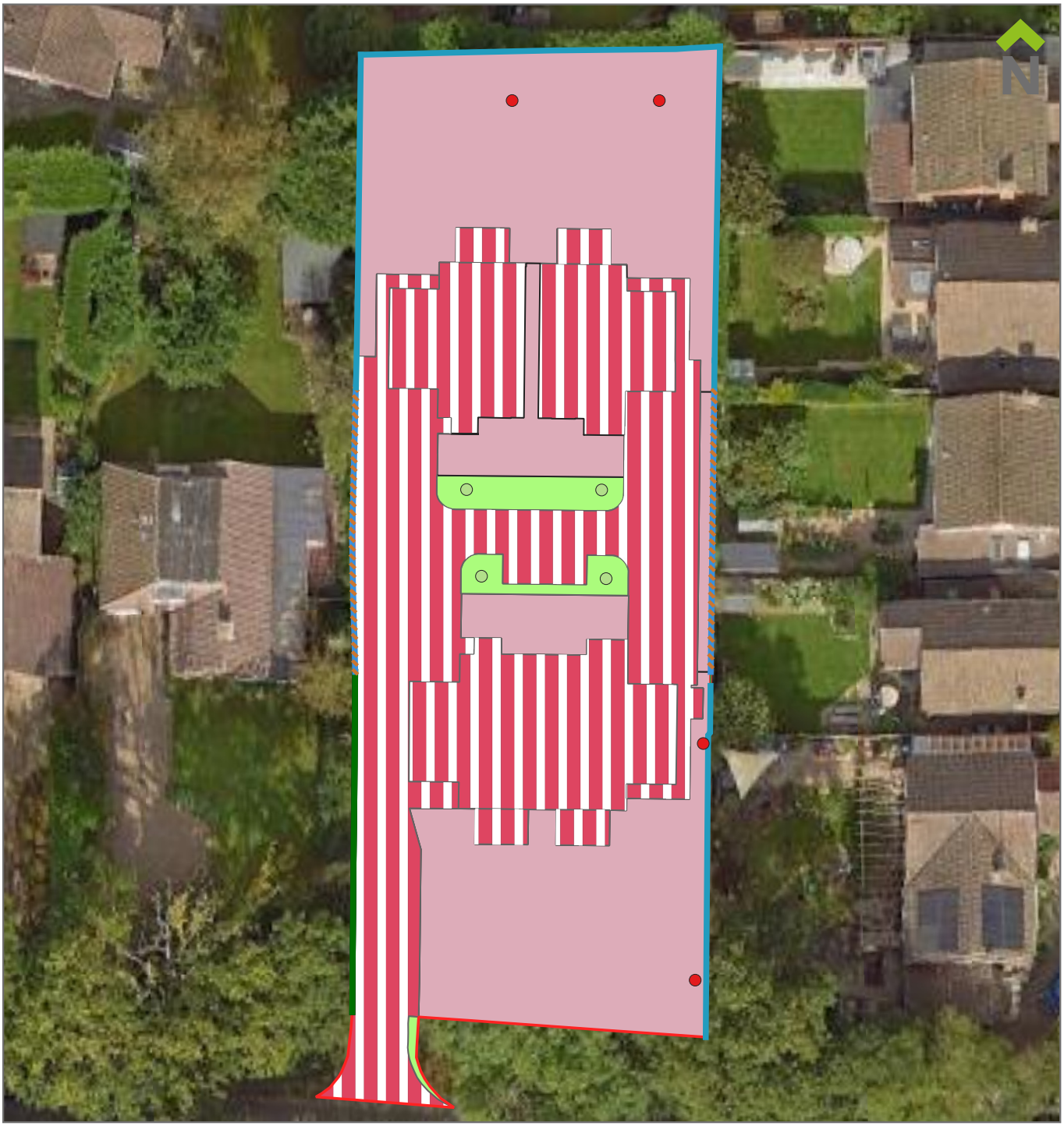
Office 20, Citibase, 95 Ditchling Road, Brighton BN1 4ST

t 01273 927399
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

Project: 75 Folders Lane, Burgess Hill		Date: January 2026	Drawing No.: CSA/7716/109
Drawing Title: Baseline Habitats Plan		Scale: 1:400	Rev: A
Client: Talbot Developments (Sussex) Ltd		Drawn: NS	Checked: LM

Appendix B

Proposed Habitats Plan



- Site boundary
- Developed land, sealed surface
- Vegetated garden
- Modified grassland
- Retained species-rich hedgerows
- Created non-native ornamental hedgerow
- Hedgerow 'lost' within BNG due to positioning within private gardens
- Newly planted trees
- Trees 'lost' within BNG due to positioning within private gardens

0 10 20 m

CSA environmental
Office 20, Citibase, 95 Ditchling Road, Brighton BN1 4ST
t 01273 927399
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

Project: 75 Folders Lane, Burgess Hill		Date: January 2026	Drawing No.: CSA/7716/108
Drawing Title: Proposed Habitats Plan		Scale: 1:399	Rev: A
Client: Talbot Developments (Sussex) Ltd		Drawn: NS	Checked: LM

Appendix C

Habitat & Hedgerow Condition Assessments

Habitat Condition Sheet: **HEDGEROW**

Condition Assessment Criteria										
A series of ten attributes, representing key physical characteristics are used for this assessment. Each attribute is assigned to one of five functional groups (A – E) and the condition of a hedgerow is assessed according to the number of attributes from these functional groups which pass or fail the 'favourable condition' criteria. This assessment is based on the Hedgerow Survey Handbook and Favourable Conservation Status document. For further clarification please refer to the Hedgerow Survey Handbook. Best practice would be to record the species, age, spacing and other key information about all trees present along a hedgerow within the 'Habitat Description' box, as well as other key features of the hedgerow.										
Hedgerow favourable condition attributes				**Pass? (Y/N)**						
Attributes and functional groupings (A, B, C, D & E)*		**Criteria (the minimum requirements for 'favourable condition'**	**Description**	**Hedgerow Ref.**						
Core groups - applicable to all hedgerow types				**H1**	**H2**	**H3**	**H4**			
A1.	Height	>1.5 m average along length	The average height of woody growth estimated from base of stem to the top of the shoots, excluding any bank beneath the hedgerow, any gaps or isolated trees. Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice). A newly planted hedgerow does not pass this criterion (unless it is >1.5 m height).	Y	Y	Y	Y			
A2.	Width	>1.5 m average along length	The average width of woody growth estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths (such as blackthorn *Prunus spinosa* suckers) are only included in the width estimate when they are >0.5 m in height. Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice).	N	Y	N	N			
B1.	Gap - hedge base	Gap between ground and base of canopy <0.5 m for >90% of length	This is the vertical 'gappiness' of the woody component of the hedgerow, and its distance from the ground to the lowest leafy growth. Certain exceptions to this criterion are acceptable (see page 65 of the Hedgerow Survey Handbook).	N	N	N	Y			
B2.	Gap - hedge canopy continuity	Gaps make up <10% of total length; and No canopy gaps >5 m	This is the horizontal 'gappiness' of the woody component of the hedgerow. Gaps are complete breaks in the woody canopy (no matter how small).	Y	Y	Y	Y			

			Access points and gates contribute to the overall 'gappiness' but are not subject to the >5 m criterion (as this is the typical size of a gate).							
C1.	Undisturbed ground and perennial vegetation	>1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: · Measured from outer edge of hedgerow; and · Is present on one side of the hedgerow (at least).	This is the level of disturbance (excluding wildlife disturbance) at the base of the hedgerow. Undisturbed ground is present for at least 90% of the hedgerow length, greater than 1 m in width and must be present along at least one side of the hedgerow. This criterion recognises the value of the hedgerow base as a boundary habitat with the capacity to support a wide range of species. Cultivation, heavily trodden footpaths, poached ground etc. can limit available habitat niches.	N	Y	Y	N			
C2.	Nutrient-enriched perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground.	The indicator species used are nettles *Urtica* spp., cleavers *Galium aparine* and docks *Rumex* spp. Their presence, either singly or together, does not exceed the 20% cover threshold.	N	N	Y	N			
D1.	Invasive and neophyte species	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA) and recently introduced species.	Recently introduced species refer to plants that have naturalised in the UK since AD 1500 (neophytes). Archaeophytes count as natives. For information on archaeophytes and neophytes see the JNCC website, as well as the BSBI website where the 'Online Atlas of the British and Irish Flora' contains an up-to-date list of the status of species. For information on invasive non-native species see the GB Non-Native Secretariat website.	Y	N	N	Y			
D2.	Current damage	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities.	This criterion addresses damaging activities that may have led to or lead to deterioration in other attributes. This could include evidence of pollution, piles of manure or rubble, or inappropriate management practices (for example, excessive hedgerow cutting).	Y	Y	Y	Y			
Additional group - applicable to hedgerows with trees only										
E1.	Tree class	There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and or ancient), and there is on average at least one mature, ancient or veteran tree present per 20 - 50m of hedgerow.	This criterion addresses if there are a range of age-classes or morphologies which allow for replacement of trees and provide opportunities for different species.	-	-	-	-			
E2.	Tree health	At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for	This criterion identifies if the trees are subject to damage which compromises the survival and health of the individual specimens.	-	-	-	-			

		wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.								
Condition categories for hedgerows without trees										
No more than 2 failures in total; **AND** No more than 1 failure in any functional group.			Good (3)							
No more than 4 failures in total; **AND** Does not fail both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and C2 = Moderate condition).			Moderate (2)	X						
Fails a total of more than 4 attributes; **OR** Fails both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).			Poor (1)		X	X	X			
Condition categories for hedgerows with trees										
No more than 2 failures in total; **AND** No more than 1 failure in any functional group.			Good (3)							
No more than 5 failures in total; **AND** Does not fail both attributes in more than one functional group (for example, fails attributes A1, A2, B1, C2 and E1 = Moderate condition).			Moderate (2)							
Fails a total of more than 5 attributes; **OR** Fails both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).			Poor (1)							

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

Condition Assessment Criteria			**Pass? (Y/N)**	
			Habitat Parcel	
			G2a	**G2b**
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	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.		N	N
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble *Rubus fruticosus* agg. may be present). Note – patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.		Y	Y
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	Y
E	Cover of bare ground between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).		Y	Y
F	Cover of bracken *Pteridium aquilinum* is less than 20%.		Y	Y
G	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).		Y	N
Condition Assessment Result			**6**	**5**
Passes 6 or 7 criteria including essential criterion A		Good (3)	X	
Passes 4 or 5 criteria including essential criterion A		Moderate (2)		X
Passes 3 or fewer criteria; **OR** Passes 4 – 6 criteria (excluding criterion A)		Poor (1)		

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

Condition Assessment Criteria			**Pass? (Y/N)**
			Habitat Parcel
			G1
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.		Y
D	Cover of bracken is less than 20% and cover of scrub (including bramble) is less than 5%.		Y
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).**		N
Condition Assessment Result			**3**
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)	X

Habitat Condition Sheet: **INDIVIDUAL TREES**

Condition Assessment Criteria		**Pass? (Y/N)**			
		T1	**T2**	**T3**	**T4**
A	The tree is a native species (or at least 70% within the block are native species).	Y	Y	N	Y
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	Y	N	Y
C	The tree is mature (or more than 50% within the block are mature).	N	Y	N	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.	Y	N	N	Y
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Y	Y	Y	N
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	Y	Y	Y
Condition Assessment Result	**Condition Assessment Score**	5	5	2	4
Passes 5 or 6 criteria	Good (3)	X	X		
Passes 3 or 4 criteria	Moderate (2)				X
Passes 2 or fewer criteria	Poor (1)			X	

CSA environmental

Dixies Barns, High Street,
Ashwell, Hertfordshire
SG7 5NT

t 01462 743647
e ashwell@csaenvironmental.co.uk
w csaenvironmental.co.uk

Office 20, Citibase,
95 Ditchling Road,
Brighton BN1 4ST

t 01273 573871
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

3 Ripple Court,
Brockeridge Park, Twyning,
Tewkesbury GL20 6FG

t 01386 751100
e tewkesbury@csaenvironmental.co.uk
w csaenvironmental.co.uk

Wizu Workspace, 32 Eyre
St, Sheffield City Centre,
Sheffield S1 4QZ

t 07838 290741
e sheffield@csaenvironmental.co.uk
w csaenvironmental.co.uk

Worting House,
Church Lane, Basingstoke,
RG23 8PY

t 01256 632340
e basingstoke@csaenvironmental.co.uk
w csaenvironmental.co.uk