



Biodiversity Net Gain Assessment

Land at Kingscote Place, Imberhorne Farm

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LIABILITIES:

Whilst every effort has been made to guarantee the accuracy of this report, it should be noted that living animals and plants are capable of migration/establishing and whilst such species may not have been located during the survey duration, their presence may be found on a site at a later date.

This report provides a snap shot of the species that were present at the time of the survey only and does not consider seasonal variation. Furthermore, where access is limited or the site supports habitats which are densely vegetated only dominant species maybe recorded.

The recommendations contained within this document are based on a reasonable timeframe between the completion of the survey and the commencement of any works. If there is any delay between the commencement of works that may conflict with timeframes laid out within this document, or have the potential to allow the ingress of protected species, a suitably qualified ecologist should be consulted.

It is the duty of care of the landowner/developer to act responsibly and comply with current environmental legislation if protected species are suspected or found prior to or during works.

1.0 Introduction

- 1.1 The Ecology Partnership was commissioned by TSA Riley to provide a Biodiversity Net Gain Assessment (BNG) on land known as Kingscote Place, Land at Imberhorne Farm. The Ecology Partnership has previously surveyed the larger area as shown in Figure 1, with the area identified as Kingcote Place shown in Figure 2 below.



Figure 1: Wider Survey Boundary

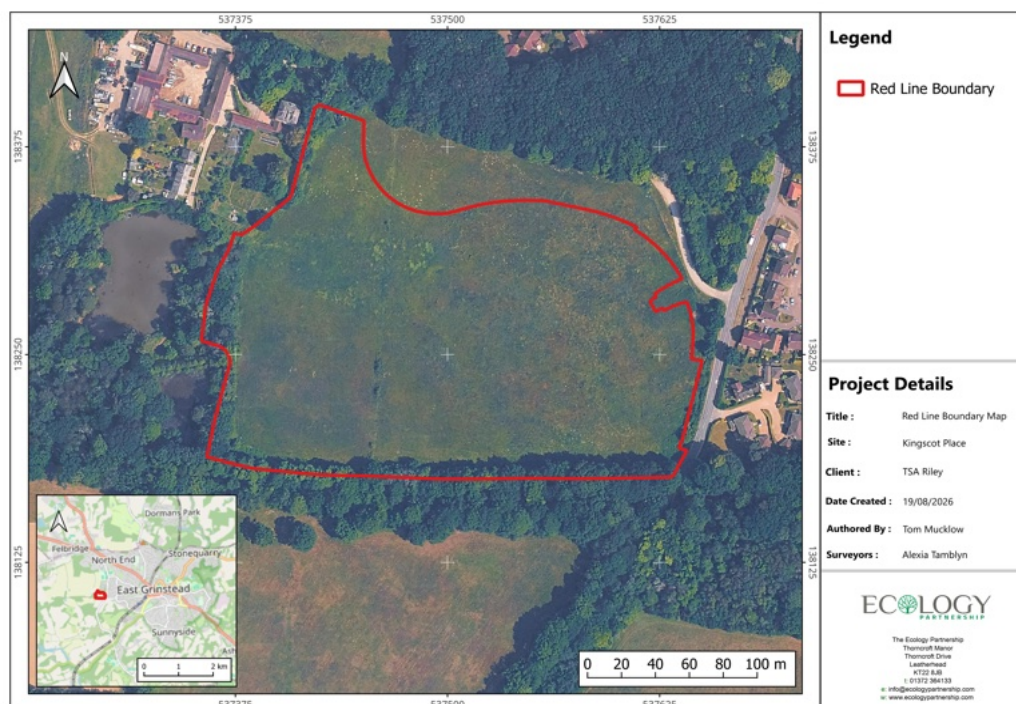


Figure 2: Kingscote Place Boundary

- 1.2 The landscape masterplan for the wider site is shown in Figure 3 below. The area which Kingscote Place development is the south eastern area of the site and shown in Figure 4.



Figure 3: Landscape masterplan 2024



Figure 4: Landscape Master Plan 2026

- 1.3 Biodiversity Net Gain (BNG) principles are aimed to support both the aspired green infrastructural proposals set to define the created landscape and support biodiversity and habitat enhancement. The requirement BNG principles are set within the Environment Bill (2021).

2.0 Methodology

- 2.1 The Statutory Biodiversity Metric is used to calculate biodiversity losses and gains for terrestrial habitats within the application area. This metric underpins the Environment Bill's provisions for mandatory biodiversity net-gain in England and defines 'measurable' net-gains.
- 2.2 The Statutory Biodiversity Metric uses habitat as a proxy for wider biodiversity with different habitat types scoring different values according to their relative biodiversity value. These are dependent on the condition and location of the habitat, in order to calculate '**biodiversity units**'.
- 2.3 In order to undertake the BNG assessment, PEAs (Preliminary Ecological Appraisals) and condition assessments (an assessment of the quality of the habitats present) were undertaken by the Ecology Partnership. Whilst a number of PEAs were conducted over the years, the survey in 2023 is the most recent with the walkover surveys conducted in 2024. Surveys were conducted by Alexia Tamblyn MA (Oxon) MSc CEcol CEnv MCIEEM FRGS and Matthew Pendry BSc (Hons) MCIEEM FISC level 4.

3.0 Baseline Results

- 3.1 The Ecology Partnership has surveyed habitats within this red line boundary, and other adjacent habitats since 2016 (see table 1 below). The red line boundary has altered a number of times since the 2016 surveys were initially conducted, however, the surveys completed to date have been robust and provide a vigorous ecological baseline.
- 3.2 Additional surveys, including PEAs and site walkover surveys were conducted, with the most recent being undertaken in 2023 and 2024.

Table 1: Species Surveys undertaken in 2016 - 2021

Faunal Group	Survey Methodology	Date of Surveys	Guidance	Results Summary
Bats – Tree Inspection and building inspection	As part of the PEA, any trees supporting features likely to be of value to bats, such as splits, cracks, rot holes, coverings of ivy, peeling bark or similar, were recorded.	The Site was initially assessed on 15 th February 2018 and 17 th July 2018 12 th July 2021	Bat Surveys – Good Practice Guidelines 3 rd edition (Collins 2016)	
Bats – Commuting and Foraging	Surveys conducted August and September 2016. Anabat detectors in August and September 2016 Surveys undertaken between May – September 2018 Anabat Express static recording devices were left on-Site in four locations for at least five consecutive nights per surveyed month.	August and September 2016 17 th May 2018 20 th June 2018 11 th July 2018 15 th August 2018 12 th September 2018 Anabat recording between May – September 2018	Bat Surveys – Good Practice Guidelines 3 rd edition (Collins 2016)	2016 surveys identified dominant common pipistrelles, with soprano pipistrelles long eared bats, Leislers, serotine, noctule and myotis recorded. 2018 surveys common pipistrelles accounted for 87% of all calls. With soprano pipistrelle, noctule, myotis sp, serotine, Leisler, brown long eared bat and two passes of Nathusius pipistrelle also recorded.
Badgers	A search for badger evidence was carried out during the Site walkover, with particular attention paid to areas where the vegetation and/or the topography offered suitable sett sites such as embankments and wooded areas. Sett entrances monitored using Bushnell Trophy cameras, with infra red motion sensitive.	The Site was assessed in January 2018. Setts identified. April – May 2018 25 th May 2023	National Survey of Badgers (Creswell <i>et al.</i> 1990).	A number of setts are present on site. One is considered to be a breeding sett. A main sett, previously identified as sett 1, is still present and active. Bedding outside holes. Considered still breeding.
Breeding Birds	Breeding bird surveys were carried out using a modified version of the British Trust for Ornithology ('BTO') Breeding Bird Atlas, with subdivisions made according to observations per habitat type.	23 rd February 2017 29 th March 2017 12 th May 2017	British Trust for Ornithology Breeding Bird Atlas (Balmer <i>et al.</i> 2013).	Skylark and yellow hammer were identified as being present within the arable landscape. Surveys during 2021 and 2023 walkover and PEA confirm the use of the site by skylark
GCNs	Habitat Suitability Index surveys completed during PEA assessment. eDNA surveys conducted Bottle trapping, torching, egg searching and netting.	24 th March 2018 DNA assessment of P12, P12a, P13 on 15 th May 2018 P8, P9, P10, P11, P11a and Ditch 1 23 rd and 24 th April 2018 1 st May 2018 8 th May 2018 14 th May 2018 22 nd May 2018	Great Crested Newt Conservation Handbook (Langton <i>et al.</i> 2001); Biggs <i>et al.</i> (2014).	Ponds P1, P2, P3, P4 fish stocked and therefore no GCN suitable. Ponds 12, P12a and P13 eDNA positive (located in garden of Gullege) No further access. P8 GCN breeding P9, P11, P11a and P12 low population of GCN P10 GCN absent P4, P5, P6, P7 no access.

Hazel dormice	Habitats assessed at the PEA. Dormouse tubes established in May 2016 and October 2018.	June – November 2016 Total 120 dormouse tubes established. October 2018 – November 2019	Dormouse Conservation Handbook - 2 nd edition (Bright <i>et al.</i> 2006)	No dormice recorded in 2016 or 2018 and 2019.
Reptiles	Habitats assessed during the PEA. Reptile survey established 6 th September 2016 and 20 th March 2019	12 th September 2016 15 th September 2016 19 th September 2016 21 st September 2016 23 rd September 2016 27 th September 2016 28 th September 2016 3 rd April 2019 5 th April 2019 8 th April 2019 15 th April 2019 25 th April 2019 6 th May 2019 15 th May 2019 21 st May 2019	Herpetofauna Workers Manual (Gent and Gibson 1998)	The site supports a 'low' population of grass snake, slow worm and common lizard.
Water voles and otters	As part of the PEA, the Site was assessed for its suitability for water voles and otters.	The Site was initially assessed on 15 th February 2018 and 17 th July 2018 12 th July 2021	Water Vole Conservation Handbook (Strachan <i>et al.</i> , 2011).	Not considered suitable for these species

3.3 The PEA baseline from 2018 is shown in Figure 5 below.

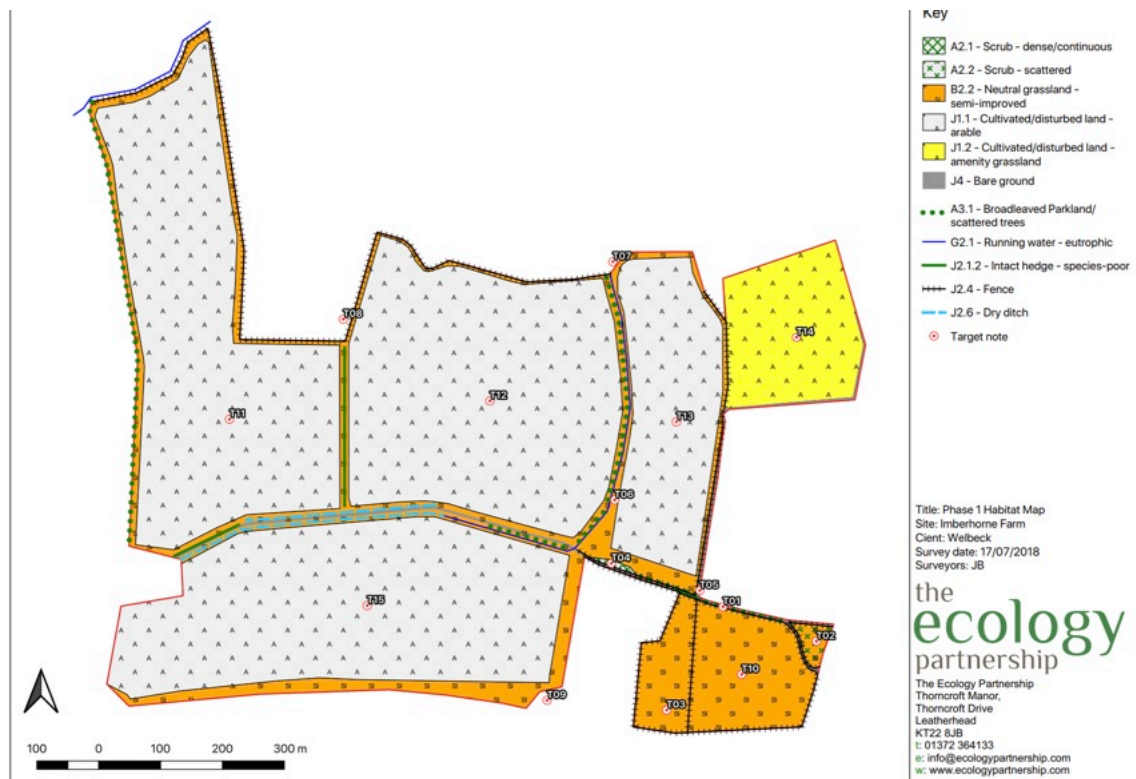


Figure 5: PEA baseline 2018

- 3.4 The area subject to this assessment was identified as an area of grazed semi-improved grassland was located in the south east corner of the site. The dominant species consisted of: Yorkshire fog (*Holcus lanatus*), dandelion (*Taraxacum agg*), birds-foot-trefoil (*Lotus corniculatus*), red clover (*Trifolium pratense*), perennial rye-grass (*Lolium perenne*), red fescue (*Festuca rubra agg.*), tufted vetch (*Vicia sativa*) common nettle (*Urtica dioica*), spear thistle (*Cirsium vulgare*), herb Robert (*Geranium robertianum*), soft rush (*Juncus effusus*) and dovesfoot cranesbill (*Geranium molle*). The southwest corner of this field was damp, with soft rush dominant across much of the habitat.
- 3.5 The update baseline across the site is shown in Figure 6 below. The area in the south eastern corner of the site was considered to be other neutral grassland.

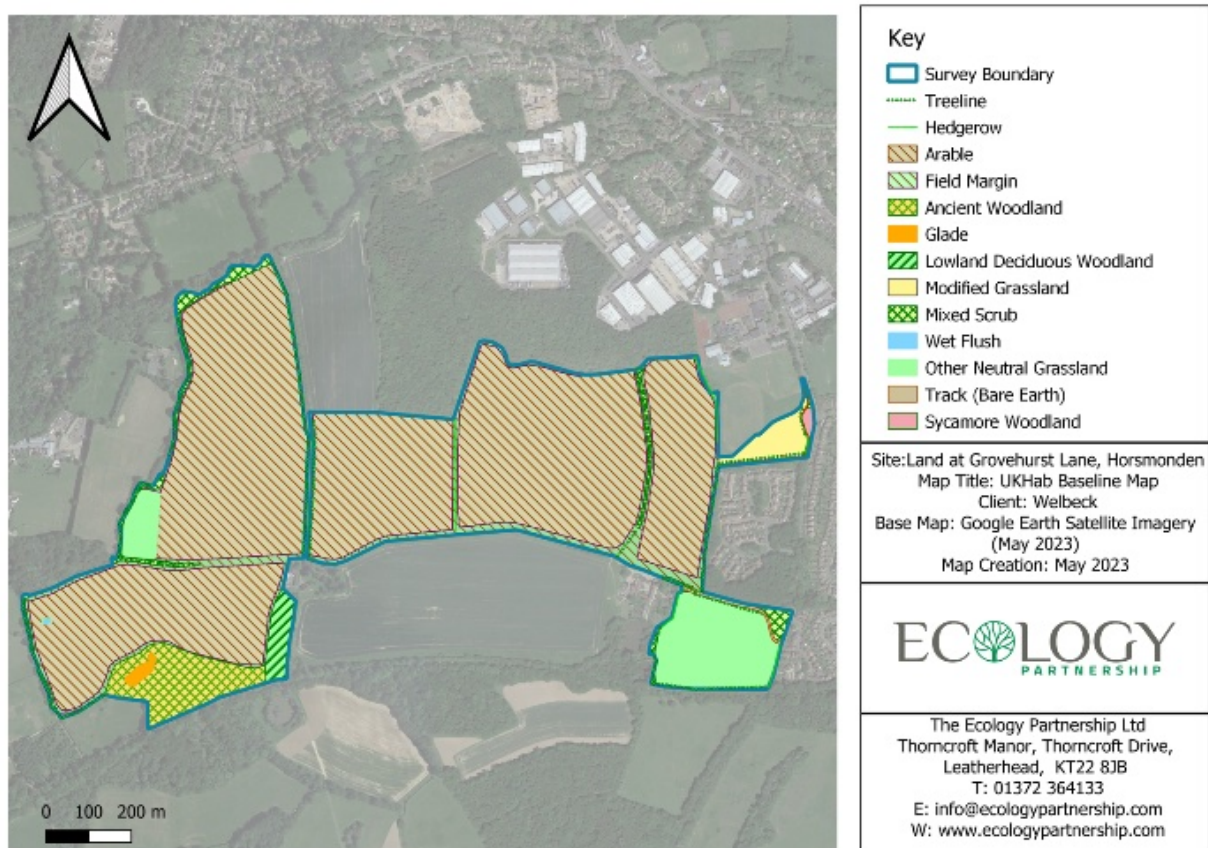


Figure 6: Baseline habitats 2026

- 3.6 A Biodiversity Net Gain assessment has been undertaken for the proposed development, which was carried out using the Statutory Biodiversity Metric. The habitat baseline is and proposed development plans are detailed in section 4.

4.0 Net Gain Assessment

- 4.1 The baseline habitats are detailed within the PEA and the breakdown of their areas are shown in table 2 below. The rear tree line is outside the current red line boundary, and a small area of scrub is located on the western edge. The remaining habitat on site is neutral grassland.

Table 2: Habitat Breakdown – Baseline

Habitat	Area (ha)	Condition
Grassland – Other Neutral Grassland	4.693	Poor condition Not a good example of type.
Mixed scrub	0.204	Poor (retained and enhanced)
Total (excluding individual trees)	4.897	

- 4.2 A review of The Local Nature Recovery Strategies for West Sussex, East Sussex and Brighton & Hove were published in June 2026 highlights that the area to the west of the proposed development site is set within an area of ‘Areas that could become of importance for biodiversity ACIB’.
- 4.3 Areas that Could become of Importance for Biodiversity (ACIB) are areas identified through the Sussex Local Nature Recovery Strategy (LNRS) as having potential to contribute to nature recovery through the enhancement, restoration and creation of habitats and the improvement of ecological connectivity. ACIBs identify opportunities where targeted habitat interventions could strengthen the wider ecological network, including through the expansion, restoration or connection of existing areas of biodiversity value. Inclusion within an ACIB therefore indicates that an area has been identified as having potential to contribute to the delivery of the LNRS’s nature recovery objectives. The location of the ACIB in relation to the Site is shown in Figure 7 and Figure 8 below.
- 4.4 The proposed habitat creation and enhancement measures have been considered against the West Sussex LNRS Local Habitat Map. As an area within the Site is located within an ACIB in which potential measures for nature recovery have been identified, the relevant habitats meet the ‘Formally identified in local strategy’ criterion for strategic significance under the Statutory Biodiversity Metric. On this basis, the applicable post-development habitat parcels have been assigned the high strategic significance multiplier of 1.15 within

the Biodiversity Metric. This recognises the contribution that the proposed habitat creation and enhancement measures will make towards the strategic priorities and objectives for nature recovery identified within the West Sussex LNRS.

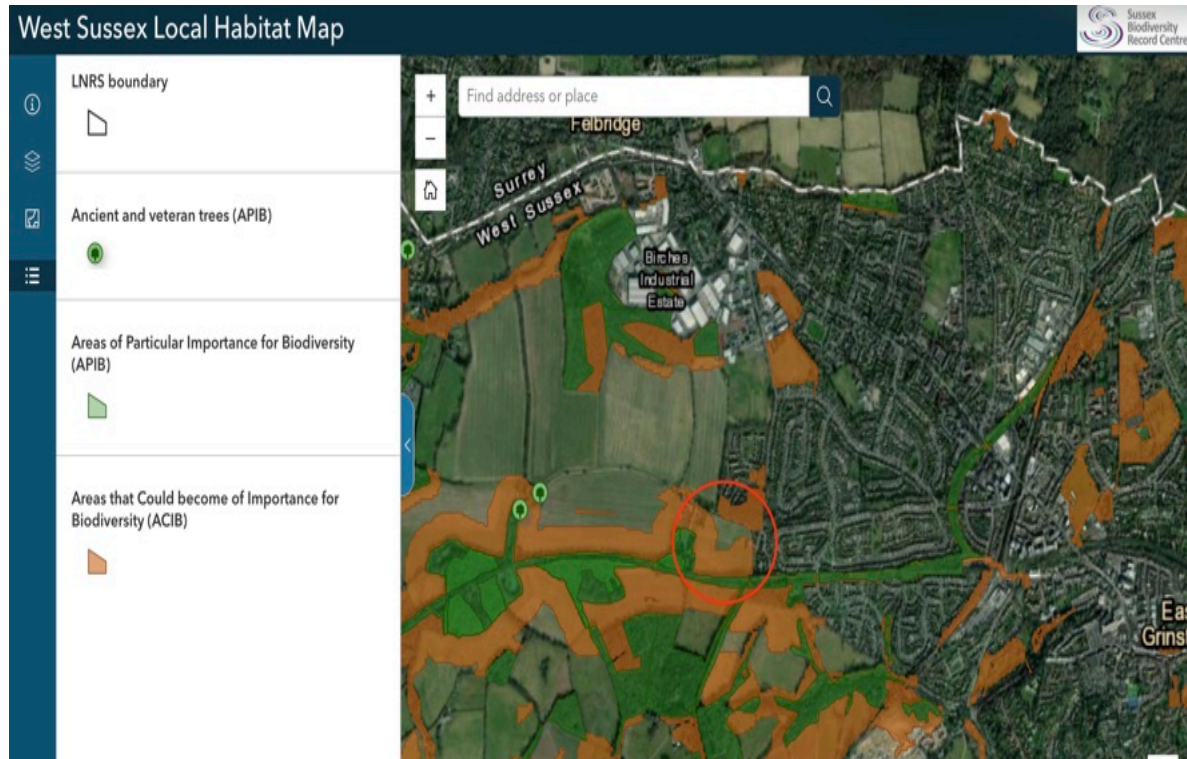


Figure 7: Location of the site in red circle and the areas shown as ACIB in brown and APIB in green

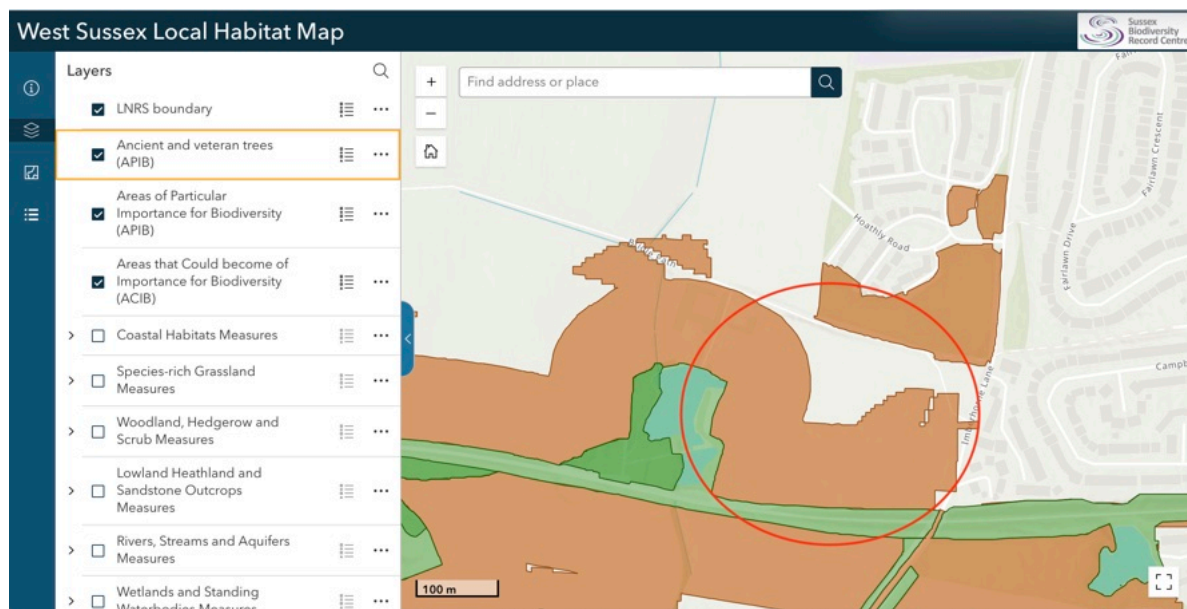


Figure 8: Location of the site in relation to ACIB with a closer view

4.5 The habitat types and areas from the proposed development are shown below in Table 3 and Table 4 and Figure 9.

Table 3: Habitat Breakdown – Post Development

Habitat	Area (ha)	Proposed Condition
Urban – Developed land; sealed surface - Buildings	0.892	'N/A - other'
Urban – Developed land; sealed surface - hardstanding	1.073	'N/A - other'
Urban – artificial unvegetated surface (garden areas)	0.081	'N/A - other'
Urban – other green roof	0.027	Condition Assessment N/A
Urban – Introduced shrub	0.072	Condition Assessment N/A
Urban – rain gardens	0.045	Good
Urban - allotments	0.017	Good
Grassland – Modified grassland (putting green, bowling green)	0.128	Poor
Grassland – modified grassland	0.678	Good
Grassland – Other neutral grassland	0.590	Moderate
Grassland – Other neutral grassland	0.440	Good (located in ACIB east)
Grassland – Other neutral grassland	0.346	Good (located in ACIB west)
Grassland - Traditional orchard	0.058	Moderate
Pond (non priority)	0.156	Moderate (located in ACIB)
Wetlands – reedbeds	0.093	Good (Located in ACIB)
Retained mixed scrub	0.204	Good (located in ACIB)
Individual trees – Urban Tree	0.285	70 trees medium condition Within development area
Individual trees – Rural Tree	0.285	70 trees medium condition Within ACIB
Total (excluding individual trees)	4.897	

Table 4: Hedgerow Proposals

Habitat	Length (km)	Condition
Native Hedgerow	0.00712	Good
Total	0.00712	

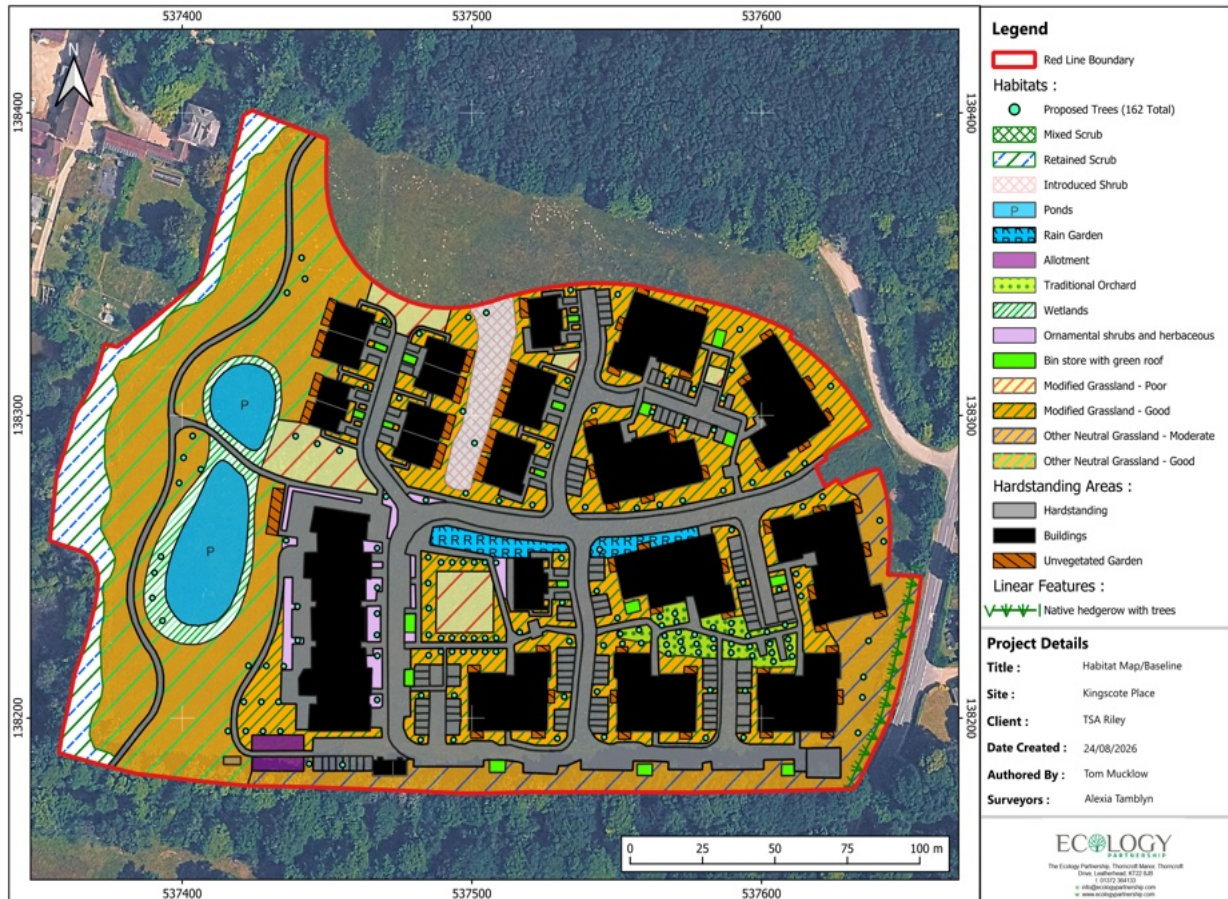


Figure 7: Proposed Habitats

- 4.6 The proposals for the site would result in a biodiversity net gain of **+10.88%** for habitats and for hedgerow units there is a net gain, but as there are no baseline hedgerow units, no percentage can be given.
- 4.7 The headline results are shown in figure 9 below.
- 4.8 The development results in a net gain. However, **the trading rules have not been satisfied. This is due to the loss of medium distinctiveness habitats (largely neutral grassland). A total of 6.24 medium distinctiveness grassland units would be required to be purchased in order to satisfy the trading.**

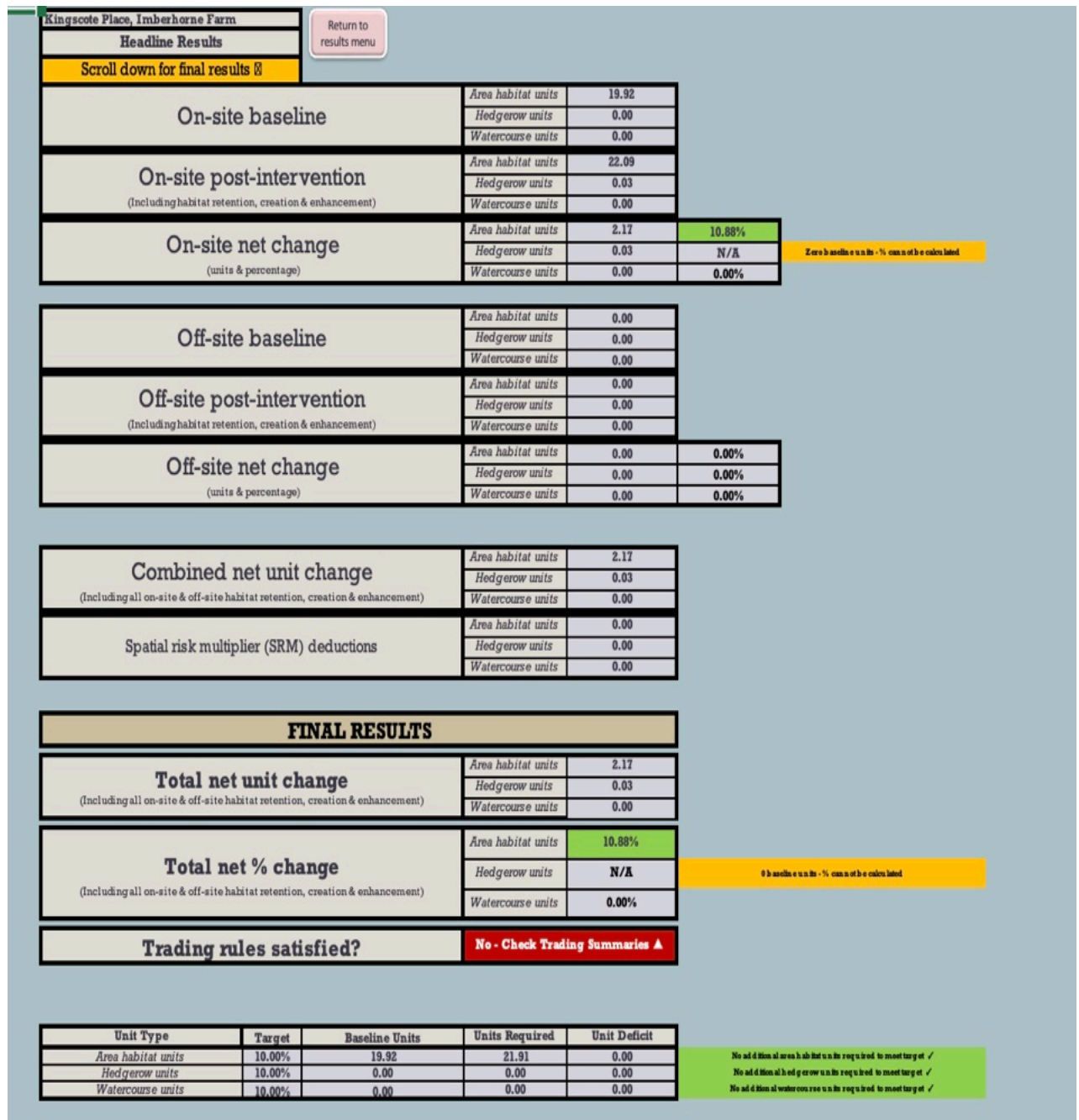


Figure 9: Headline results +10.88% net gain

5.0 Other Enhancements

Integrated bat features

- 5.1 Bat boxes can be hung on the proposed buildings and existing trees to provide new roosting opportunities. The box should be positioned on a north or east facing aspect and at least 2m above the ground if possible. Recommended boxes include:

- Low Profile Woodstone Bat Box – A general purpose bat box that supports a range of species (Figure 8). These can be hung on trees and buildings in a variety of heights and aspects in order to provide a variety of micro-climates.
- Large Multi Chamber WoodStone Bat Box – This is a multipurpose box designed for larger colonies and a range of bat species including pipistrelles, noctules and brown long-eared bats. These should be hung on mature trees around the site (Figure 8).



Figure 8: Low Profile Woodstone Bat Box (left) and Large Multi Chamber WoodStone Bat Box (right)

Log Piles

- 5.2 Log piles should be created on site, especially in the newly created wildflower meadow and around the ponds, in order to provide further habitats for a wide range of invertebrates, which in turn provides a food source for larger fauna, and hence increasing the biodiversity of the Site. Log piles should be made from native, broadleaved trees, and should be partially buried. Examples are shown in Figure 9.



Figure 9: Examples of log pile creation

Bird Boxes

- 5.3 Additional nesting opportunities can be installed within existing trees on Site, or new buildings. Again, hardwearing woodcrete boxes, or similar, are recommended. Figure 10 below gives examples of suitable bird boxes which could be installed onto the brickwork of the units or into the trees. The box should be positioned on a north or east facing aspect and at least 2m above the ground if possible. These would cater for species such as house sparrows and wagtails and the smaller garden birds.



Figure 10: Examples of suitable bird boxes which could be installed on site

– Vivara Pro WoodStone House Sparrow Nest Box (left), Vivara Pro Barcelona WoodStone Open Nest Box (centre) and Vivara Pro Seville 32mm WoodStone Nest Box (right)

6.0 Conclusions

- 6.1 The proposed development site supports medium distinctiveness habitats being mixed scrub and neutral grassland.
- 6.3 Biodiversity net gain of 10.88% has been achieved, however due to the loss of neutral grassland off setting will be required to ensure the trading rules have been met Other enhancements have been recommended.

Appendix 1: Condition Assessment

Condition Sheet: GRASSLAND Habitat Type (medium, high & very high distinctiveness)		
UKHab Habitat Type(s): All other grassland types and tall ruderal (ie. not amenity/modified)		
Condition Assessment Criteria		Grassland in south eastern corner
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 Footnote 3 suboptimal species which may be listed in the UKHab description).¹ Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Fail. Not a good example of type.
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Fail. Managed either through grazing or mowing
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens ² .	Fail.
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Pass
E	Combined cover of species indicative of sub-optimal condition³ 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 species⁴ (as listed on Schedule 9 of WCA⁵) are present, this criterion is automatically failed.	Pass
Additional Criterion - must be assessed for all non-acid grassland types		
F	There are 10 or more vascular plant species per m² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	Fail
Condition		POOR

Condition Assessment Result	
Good	Passes 5 of 6 criteria, including essential criterion A and F
Moderate	Passes 3 or 4 of 6 criteria, including essential criterion A
Poor	Passes 0, 1, 2 criteria of 6 criteria; OR Passes 3 or 4 criteria excluding criterion A and F
Footnote 1 – Professional judgement should be used alongside the UKHab description. Footnote 2 – For example, this could include small, scattered areas of bare ground allowing for plant colonisation, or localised patches where not exceeding 5% cover. Footnote 3 – Species indicative of suboptimal condition for this habitat type include: creeping thistle <i>Cirsium arvense</i>, spear thistle <i>Cirsium vulgare</i>, curled dock <i>Rumex crispus</i>, broad-leaved dock <i>Rumex obtusifolius</i>, common nettle <i>Urtica dioica</i>, creeping buttercup <i>Ranunculus repens</i>, greater plantain <i>Plantago major</i>, white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i>. Footnote 4 – Assess this for distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into the adjacent habitat, by applying professional judgment. Footnote 5 – Wildlife and Countryside Act 1981 (as amended)	

Condition Sheet: SCRUB Habitat Type		
UKHab Habitat Type(s): All forms of scrub		
Condition Assessment Criteria		Scrub
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range). ¹ - At least 80% of scrub is native, - There are at least three native woody species ² , - No single species comprises more than 75% of the cover (except hazel <i>Corylus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophaerhamnoides</i> or box <i>Buxus sempervirens</i> , which can be up to 100% cover).	Pass
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran ³) shrubs are all present.	Fail – all young scrub developing at the time of the survey
C	There is an absence of invasive non-native plant species ⁴ (as listed on Schedule 9 of WCA ⁵) and species indicative of sub-optimal condition ⁸ make up less than 5% of ground cover.	Pass
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	Fail
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Fail
Condition		Poor
Condition Assessment Result		
Good	Passes 5 of 5 criteria	
Moderate	Passes 3 or 4 of 5 criteria	
Poor	Passes 2 or fewer criteria	
Footnote 1 – Professional judgement should be used alongside the UKHab description.		
Footnote 2 – Native woody species as defined and listed in the Hedgerow Survey Handbook: DEFRA (2007) <i>Hedgerow Survey Handbook: A standard procedure for local surveys in the UK</i> . 2nd ed. [online]. Defra, London. PB1195. Available from: Hedgerow Survey Handbook (publishing.service.gov.uk).		
Footnote 3 – See gov.uk standing advice on ancient and veteran species. Available from: Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk) and		

[Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions)

Footnote 4 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.

Footnote 5 – Wildlife and Countryside Act 1981 (as amended).

Footnote 6 – Species indicative of suboptimal condition for this habitat type may include: non-native conifers, tree-of-heaven *Alnus altissima*, holm oak *Quercus ilex*, European turkey oak *Quercus cerris*, cherry laurel *Prunus laurocerasus*, snowberry *Symphoricarpos* spp., shallon *Gaultheria shallon*, American skunk cabbage *Lysichiton americanus*, buddleia *Buddleja* spp., cotoneaster *Cotoneaster* spp., Spanish bluebell *Hyacinthoides hispanica* and hybrid bluebells *Hyacinthoides x massartiana*. There may be additional relevant species local to the region and or site.

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