

Date: 17/07/2026

Our reference: 6136-9

Royal Botanical Gardens Kew

Dear Richard

Re: Biodiversity Net Gain Assessment

Site address: Wild Play, Kew Gardens Wakehurst, Selsfield Rd, Haywards Heath, RH17 6TN

SWT Ecology Services completed a Biodiversity Net Gain assessment of the above site in 2024 (SWT Ecology Services, 2024). This comprised a habitat survey to record baseline habitats and establish the condition of these, along with an assessment for the site to support protect species and assess the impact of the proposals on these. A revised landscaping plan (Southern Green, 2026), accompanied by a change in the red line boundary has been developed and a revised BNG Assessment is required to inform the planning application. Figure 1 presents the baseline habitats. The post-intervention habitats are detailed in the General Arrangement Plan (Southern Green, 2026).

The biodiversity net gain summary is detailed below, demonstrating the project will deliver the required BNG for habitats and hedgerows. Should planning permission be granted, a Biodiversity Gain Plan will need to be submitted as a condition of the permission. Development cannot commence until the plan has been approved. Details of how the biodiversity net gain will be achieved will need to be documented in a HMMP.

Onsite baseline units	Habitat units	2.41
	Hedgerow units	0.02
Onsite post-intervention units	Habitat units	7.42
	Hedgerow units	0.44
Total unit change¹²	Habitat units	5.01
	Hedgerow units	0.42
Total net % change¹	Habitat units	208.05%
	Hedgerow units	2141.77%
Trading rules satisfied?		Yes
Irreplaceable habitats present?		No

Kind regards,

Gabrielle Graham BSc (Hons) MSc MCIEEM CEcol – Managing Director

¹ Includes all onsite, offsite habitat retention, creation and enhancement

² > 10 % gain	0 – 9% gain	< 0% gain
--------------------------	-------------	-----------

Key

 Site Boundary

UK Habitat Classification - Area

 BNG1160 - Introduced shrub

 g3c - Other neutral grassland

 g4 - Modified grassland

 h3d - Bramble scrub

 u1b - Developed land; sealed surface

 u1b5 - Buildings

 u1c - Artificial unvegetated, unsealed surface

 w1h - Other woodland; mixed

 w1h5 - Other woodland; mixed; mainly broadleaved

 w1h6 - Other woodland; mixed; mainly conifer

UK Habitat Classification - Linear

 h2a: Native hedgerow

 h2b: Non-native and ornamental hedgerow

 u1e: Built linear features

Secondary Codes (Compartment Number)

853: Mortared Wall (LFI)

523: Non-native (5)



Scale: 1:500

Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack

Produced by: Surrey Wildlife Trust Ecology Services

Created By: EB
6136-7, July 2026

**Figure 1: Royal Botanic Gardens Kew,
Wakehurst, Wild Play Area
Baseline Habitat Survey**



References

- BSI. (2021). *BS 8683 - Process for designing and implementing Biodiversity Net Gain – Specification*. British Standards Institution.
- CIEEM, CIRIA, IEMA. (2019). *Biodiversity net gain. Good practice principles for development. A practical guide*. London, UK: CIRIA C776a.
- DEFRA. (2024a). *Biodiversity Net Gain Metric Statutory Metric: User Guide*. Natural England.
- DEFRA. (2024b). *The Statutory Metric - Technical Annex 1: Condition Assessment Sheets and Methodology*. DEFRA.
- Ministry of Housing, Communities and Local Government. (2024). *National Planning Policy Framework*. London: Ministry of Housing, Communities and Local Government.
- Ministry of Housing, Communities and Local Government. (2024). *Planning Practice Guidance*.
- Southern Green. (2026). *1544_100 Landscape General Arrangement Plan (Wild Play)*, dated 17th July 2026.
- Sussex Local Nature Recovery. (2026). *Local Nature Recovery Strategy for West Sussex*. Retrieved from https://experience.arcgis.com/experience/27822f79da854676b4b8738f919051d4/page/Page?views=Map-Layers#data_s=id%3AdataSource_3-19df80af51b-layer-49-19df8075473-layer-9%3A1
- SWT Ecology Services. (2024). *Ecology Report, Kew Gardens: Wild Play*. Pirbright: SWT Ecology Services.

Appendix 1: Methods and results

Methods

- 1.1.1 Biodiversity net gain is a process applied to a project that aims to deliver a net positive change in biodiversity throughout a project lifecycle by implementing eight principles and rules (DEFRA, 2024a) (CIEEM, CIRIA, IEMA, 2019) (BSI, 2021).
- 1.1.2 To deliver a net gain in biodiversity, the following rules must be adhered to:
 - Rule 1: Trading rules must be followed
 - Rule 2: Biodiversity unit outputs, for each type of unit, must not be summed, traded or converted between types and at least 10% gain applies to each type of unit (e.g. habitats, hedgerows and watercourses).
 - Rule 3: To accurately calculate the gains, the statutory biodiversity metric calculation tool, or small sites biodiversity metric tool where applicable, must be used.
 - Rule 4: In exceptional circumstances, deviation from the biodiversity net gain metric methodology may be permitted by the relevant planning authority.
- 1.1.3 Nine principles, detailed in the statutory guidance, underpin the biodiversity metric tool.
- 1.1.4 The Local Planning Authority must take account how a development has implemented the Biodiversity Gain Hierarchy, as set in Town and Country Planning (Development Management Procedure) (England) Order 2015 (Ministry of Housing, Communities and Local Government, 2024), which is to:
 - **Avoid** impacts where possible through careful project design, and specifically to habitats that have a medium, high and very high distinctiveness
 - **Minimise** impacts where these cannot be avoided, prioritising the minimisation in order of distinctiveness
 - **Restore** habitats that are retained or could be impacted by the project
 - As a last resort, **compensate** for the loss or damage of habitats through habitat creation primarily within the red line boundary, and if this is not possible, offsite compensation can be considered. Where offsite offsets are considered, these should be as close as possible to the impact site.
- 1.1.5 The biodiversity net gain assessment was undertaken in line with the statutory metric (DEFRA, 2024a).

Baseline biodiversity units

- 1.1.1 Calculating baseline biodiversity units requires information on a habitat's area, distinctiveness, condition, and strategic significance. The habitat areas and habitat condition are based on the habitat survey methods detailed above.
- 1.1.2 Distinctiveness refers to the relative scarcity of the habitat and its importance for nature conservation. The distinctiveness categories are pre-determined by the metric.
- 1.1.3 Strategic significance is assessed against the Local Nature Recovery Strategy (LNRS) for West Sussex, published in June 2026 (Sussex Local Nature Recovery, 2026). In line with the guidance, all baseline habitats were assessed as having a low strategic significance. Three layers occur within the LNRS Interactive Map; their relevant is discussed below.
 - Area that could be of importance for biodiversity: Although this indicates there is potential for biodiversity, this has no impact on strategic significance.

- W1.5 Enhance wood pasture and parkland: Measures to enhance wood pasture and parkland are identified in the LNRS. The habitats located within the red line boundary do not comprise woodland and parkland therefore a low strategic significance is applied. However opportunities to implement the measures to enhance the site for woodland, such as retention of deadwood and removal of invasive non-native species will be implemented to enhance the woodland within the red line boundary. Considering these measures are not explicitly identified in the LNRS, woodland parcels are identified as low strategic significance.
 - Cor 2.2 Create new wildlife corridor: The proposal includes retention of existing higher value habitats (woodland) and creation of some semi-natural habitats (e.g. hedgerow and grasslands), however does not include the creation of a **new** wildlife corridor. As such, low strategic significance is applied.
 - Based on the above, a **low strategic significance** has been applied to all parcels.
- 1.1.4 The data were inputted into the statutory biodiversity net gain metric accessed on 17/07/2026 (DEFRA, 2024a). The completed metric accompanies this report.
- 1.1.5 The baseline units were calculated for:
- Habitats
 - Hedgerows
- 1.1.6 Condition for each habitat was assessed in line with the condition assessment sheets (DEFRA, 2024b). Completed assessment sheets accompany this report and are based on surveys undertaken to inform the application in 2024.

Hedgerows

- 1.1.7 Standard methodology was used to assess hedgerows. Where double hedgerows were observed, these were recorded as two hedgerows (DEFRA, 2024a) (DEFRA, 2024b).

Post-development calculations

- 1.1.8 The latest landscaping plans were reviewed by an ecologist and predicted post-construction habitat types were allocated a UK habitat classification and likely habitat condition by the ecologist. Strategic significance was also determine based on available information in the local plan.
- 1.1.9 In calculating the post-development impacts the following key elements were considered:
- If habitats that are retained cannot be maintained in their current condition, the habitat will be recorded as:
 - Lost
 - Lower condition
 - Habitat created in advance to + 30 years
 - Explanation in the assessor's comments
 - Habitat enhancements are those where:
 - The condition is improved compared with the baseline state.
 - A change to a higher distinctiveness habitat in the same broad habitat group
 - Restoration of relict high or very high distinctiveness habitats.
 - Existing high or very high distinctiveness habitats may be shown as an enhancement however sufficient plant communities for the target habitat must be evidenced as present to achieve this.

- Habitat creation is considered where there is a loss of baseline habitat and it is replaced with another, or a change in broad habitat type (e.g. grassland to woodland).
- Advance or delayed habitat creation
 - The time selected for this is reflective of the difference between when the habitat will be created versus when it was removed. For example, if the landscaping works are undertaken in Year 2 after vegetation clearance, a “2” will be selected in the appropriate column. Where possible, advance creation should be encouraged to reduce the temporal risk factor applied, and will reduce the number of biodiversity units required to deliver the biodiversity net gain.

Individual trees

- 1.1.10 The post-intervention trees were based on the trees identified during the baseline surveys..
- 1.1.11 Newly planted trees were selected a small size, unless a larger size was selected at planting.

Compensation

- 1.1.12 To meet biodiversity net gain objectives, compensation must be either delivered within the site boundary (onsite) or outside the site boundary (offsite). A spatial risk factor is determined based on where the proposed compensation will be delivered, encouraging the delivery of compensation as close as possible to the site boundary.
- Spatial risk score of 1: Whether the compensation is inside the Local Planning Authority boundary or National Character Area. For watercourses this is within the waterbody catchment.
 - Spatial risk score of 0.75: Whether the compensation is within a neighbouring Local Planning Authority boundary or Natural Character Area. For watercourses, this is outside the waterbody catchment but within the operational catchment.
 - Spatial risk score of 0.5: Does not comply with the two situations above.

Limitations

- 1.1.13 The survey was undertaken in optimal conditions. The surveys were completed in September 2024 with no significant limitations. We understand from discussions with the applicant that the site management during this time remained constant, therefore the condition of the site is unlikely to have changed. Based on the habitat types (predominantly woodland) significant changes in habitat condition are unlikely to occur during this time period and as such it is reasonable to rely on the data collected in September 2024 for the BNG Assessment. A final pre-BNG Gain plan and the results can be relied upon to inform the impact assessment.

Results

- 1.1.14 Full habitat survey results are detailed in the Ecology Report that accompanies this report (SWT Ecology Services, 2024).
- 1.1.15 Habitat condition assessment forms are provided as a separate document which should be read in conjunction with this report.