



Western Bridge and Link Road (WBLR) Phase 3 (Brookleigh, Burgess Hill)

Biodiversity Net Gain Report

April 2025

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This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Revision	Status	Date	Prepared by	Checked by	Approved by
02	S3	24 April 2025	Nicole King Senior Ecologist	Karl Harrison Associate Director	Karl Harrison Associate Director



Comments

Revision		Status	
Pnn	Preliminary (shared; non-contractual)	S1	Coordination
Cnn	Contractual	S2	Information
		S3	Review & Comment
		S4	Review & Authorise
		S5	Review & Acceptance
		A0, A1, An	Authorised & Accepted (n=work stage if applicable)

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1. Introduction

Waterman Infrastructure & Environment Ltd (Waterman) has been commissioned by Jackson Civil Engineering Group Ltd on behalf of Homes England (hereafter referred to as 'the Applicant') to carry out a Biodiversity Net Gain (BNG) Assessment to support a planning application for a new pedestrian and cycle route (Application Reference DM/25/0110). Although this application is separate and standalone, it forms part of further highways improvements (Application Reference: DM/25/0109) and wider mixed-use development on land to the north-west of Burgess Hill (Application Reference: DM/18/5114) (hereafter referred to as 'the Brookleigh Development').

1.1 The Site and Proposed Scheme

This application relates to creation of a pedestrian and cycle path along the west verge of the Jane Murray Way (A273), providing a connection between the A273 Roundabout and Gatehouse Lane. It comprises the hard landscaping of the existing grass verge.

1.2 Relevant Legislation and Policy

The Environment Act 2021, which was given Royal Assent in November 2021, makes it mandatory to contribute a minimum of 10% net gain for biodiversity as a component of new development in England. This requirement was mandated in February 2024 through the implementation of secondary regulations.

2. Methodology

2.1 Defining Biodiversity Net Gain

Biodiversity Net Gain (BNG) is defined as a specific, quantifiable outcome of project activities that deliver demonstrable benefits for biodiversity compared to the baseline situation. Achieving BNG means that a project's activities (i.e., the development) leaves biodiversity in a better state than before. It is also an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation.

This BNG assessment compares the biodiversity value of the Site baseline habitats with those habitats anticipated to be present following completion of the Works. The following simple calculation is used:

Post-Development Biodiversity – Pre-Development Biodiversity = Biodiversity Net Change.

The aim is to achieve the target net gain of 10% through habitat creation on Site, with off-site provision of biodiversity units where on-site is not possible.

2.2 The Statutory Biodiversity Metric

This assessment has been completed using the Statutory Biodiversity Metric (hereafter referred to as 'the Metric') and has been written in line with current guidance¹. The Metric calculates biodiversity unit scores (which are a proxy for true biodiversity value) and uses these to indicate percentage change in biodiversity as a result of a development.

Baseline

Baseline habitat data was collected as part of a desk study and a field survey completed on 9th April 2024, reported in the Ecological Impact Assessment². The baseline data was collected in line with the UK Habitat Classification System (UK Habs)³ as mapped on **Figure 1**. Condition assessments were also undertaken alongside this survey using the condition assessment tools provided with the Metric⁴, these have been provided in **Appendix A**.

Areas for trees within the baseline assessment were calculated using the Metric 'Urban Tree Helper'. As per guidance, all trees are captured as small in the metric.

Post-Development

The post development calculations are based on the landscape design for the Application Site and the 'best fit' in terms of UKHabs for the proposed habitats. A CAD version of the landscape design was used to plot the habitats as polygons in GIS and thus calculate areas in hectares for input into the metric.

Minimum Mapping Units and Rounding

The Minimum Mapping Unit (MMU) for area applied in this assessment is 25 sqm, and the minimum mappable length for linear features is 5m.

Figures input into the SBM have been rounded to three decimal places. Any replication of work that does not adhere to this rounding precision may result in minor variations in results.

¹ Defra 2024, The Statutory Biodiversity Metric User Guide

² WIE 19442-103 R 2-2-2 EcIA

³ <https://ukhab.org/>

⁴ The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology. July 2024 (v1.0.2)

The Metric rounds biodiversity unit values to two decimal places for reporting purposes. This can result in apparent discrepancies when comparing headline unit values and percentage changes, particularly on small sites where changes in unit values are minimal but proportionally significant. However, when only the rounded unit figures are considered, this level of change may appear inconsistent or misleading. All percentage changes cited within this report are those calculated and presented by the Biodiversity Metric itself, and these should be referred to when interpreting the results.

Metric Principles and Rules

Natural England advise that the SBM is a tool that helps inform plans and decisions, by using habitats as a proxy for measuring biodiversity value, but that any assessment must be undertaken with awareness of its limitations.

When designing for BNG, the biodiversity metric rules should be followed. These are:

- **Rule 1:** The trading rules of this biodiversity metric must be followed.
- **Rule 2:** Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.
- **Rule 3:** To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.
- **Rule 4:** In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

To inform the use of the SBM the biodiversity metric principles should be used. These are:

- **Principle 1:** The metric assessment should be completed by a competent person.
- **Principle 2:** The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example, woodlands.
- **Principle 3:** This biodiversity metric should be used in accordance with established good practice guidance and professional codes.
- **Principle 4:** This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
- **Principle 5:** Biodiversity units are a proxy for biodiversity and should be treated as relative values.
- **Principle 6:** This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.
- **Principle 7:** Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
- **Principle 8:** Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.
- **Principle 9:** This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to:
 - maintain habitat extent - supporting more, bigger, better and more joined up ecological networks
 - ensure that proposed or retained habitat parcels are of sufficient size for ecological function

2.3 Assumptions & Limitations

Baseline habitats have been mapped using a 'Minimum Mappable Unit' area of 25m² applied in line with UK Hab methodology. As such, some small areas of habitat including ground level planters are excluded from the BNG assessment. This will not significantly affect the BNG calculations undertaken as part of this assessment.

Works have already commenced to the north of the site under a separate application, relating to the installation of a path and drop kerb. These features are located within the northwestern section of the proposed red line boundary and are included within this application. The metric has been updated to reflect a delay in the creation of the proposed Grassland in this area, as the baseline grassland was cleared as part of the earlier works. This update captures the time lag between the clearance in 2024 and the proposed habitat creation now scheduled for 2026.

It has been assumed the new landscaping under the Applicant's ownership will be subject to a management regime of a minimum of 30 years as per best practice guidance or to a timeframe agreed with the local planning authority as part of BNG Assessment for the wider Brookleigh Development. The mechanism to achieve this is usually completed by a suitably worded pre-commencement planning condition but this is subject to the local planning authority's approach to BNG.

Detail on the assumptions made for the post development habitat conditions, is detailed in the following section.

It is important to note that this report does not define the full detailed methodology for BNG assessment, the guidance documents should be referred to where relevant and if necessary.

Strategic Significance

Burgess Hill is not within the High Weald Area of Outstanding Natural Beauty, or within the South Downs National Park. It does not fall within the 7km Impact Risk zone for the Ashdown Forest SAC/SPA and there are no Local Nature Recovery Strategies or other similar strategies produced for the area. In addition, the habitats are small and located within the highly urban area.

Therefore, the strategic significance for all habitats baseline and proposed is entered as low – 'area/compensation not in local strategy/no local strategy'.

3. Baseline Habitats

This section provides a brief description of the current baseline conditions for the Site. Further details of habitat descriptions and photographs can be found in the EcIA report³, which accompanies this planning application. Habitats are mapped and labelled on **Figure 1** and condition assessments are given in **Appendix A**.

3.1 Area Habitats

The medium distinctiveness habitats present within the Site include two small Individual Trees - Urban.

The low distinctiveness habitats present at the Site include modified grassland (MG6 and MG7).

The very low distinctives habitats present at the Site include developed land – sealed surface.

A summary of the habitats present within the Site and their condition is given in **Table 1** below.

Table 1: Baseline Area Habitats

Habitat	Area (ha)	Habitat Distinctiveness	Habitat Condition	Baseline Habitat Units**
Urban: developed land; sealed surface	0.086	Very Low	N/A*	0.00
Grassland: modified grassland (MG6)	0.007	Low	Poor	0.01
Grassland: modified grassland (MG7)	0.014	Low	Poor	0.03
Individual Trees: Urban Trees	0.008	Medium	Poor	0.03
Total (Including Trees)	0.115	-	-	0.07
Total (Excluding Trees)	0.107	-	-	0.04

4. Proposed Habitats

The proposed habitats are mapped on **Figure 2**. The proposed habitats are based on the landscape design by Waterman (Drawing number 19442-WIE-ZZ-XX-DR-C-740101), which accompanies this planning application. Proposed soft landscaping habitats as listed in these drawings include:

- Proposed wildflower mix;
- Existing ground flora retained/seeded;

What these listed habitats correspond to within the Metric is discussed below.

4.1 Habitat Loss and Retention

Retention

The landscape design displays areas of retained vegetation – this includes part of MG7 and all of MG6. These layers have been used to identify the extent of habitat retention to input into the metric using GIS.

Loss

All other areas of habitat and individual Trees are lost, with replacement habitat creation proposed as proposed wildflower mix and new areas of sealed surface.

Where areas of modified grassland are to be replaced with a wildflower mix, this is inputted as a loss and habitat creation. This is because it is assumed that the area will be removed during construction and ultimately planted up upon the completion of construction within one year (rather than targeted enhancement/ protection and management during the construction period).

A summary of habitat losses is given in **Table 2** below.

Table 2: Summary of Existing Biodiversity Units Lost

Habitat	Area/length retained	Area/length lost	Distinctiveness	Condition	Habitat Units Lost
Urban: developed land; sealed surface	0.000 ha	0.086 ha	Very low	N/A*	0.00
Grassland: modified grassland (MG6)	0.007 ha	0.000 ha	Low	Poor	0.00
Grassland: modified grassland (MG7)	0.005 ha	0.009 ha	Low	Poor	0.02
Total	0.012 ha	0.095 ha	-	-	0.02

4.2 Habitat Enhancement

Patchy areas currently present in the retained sections of MG6 and MG7 are to be seeded with wildflower mix'. Therefore, this ground flora seeding is considered an enhancement to the existing grassland, enabling the modified grassland to pass criteria A in the condition assessment and achieve Moderate Condition (*"There are 6-8 vascular plant species per m2 present, including at least 2 forbs. **Note - this criterion is essential for achieving Moderate or Good condition.**"*).

4.3 Habitat Creation

The landscape design shows one created habitat (other than those discussed above with regards to habitat enhancement):

- Proposed Wildflower mix

The proposed wildflower mix is likely to be suitable to be considered as an 'other neutral grassland'. To be such a grassland it has to pass three of the following criteria:

- >20% cover of broadleaved herbs and sedges
- >8 species per sqm (excluding bryophytes)
- ≥ 1 species not generally sown for intensive agricultural production is at least dominant
- Cover of ryegrasses and white clover, if present, is less than 30%

Readily available wildflower meadow mixes typically meet all of these criteria. With appropriate management, these areas are likely to reach moderate condition as shown in **Appendix B**.

New footways and road resurfacing are inputted as sealed surface.

A summary of the created habitats is given in **Table 5** below.

Table 3: Summary of Potential Units Created

Habitat	Habitat Distinctiveness	Habitat Condition	Area/length Created	Habitat Units Created
Grassland: Other neutral grassland	Medium	Moderate	0.002 ha	0.01
Urban: sealed surface	V.Low	N/A	0.086 ha	0.00
Total without trees	-	-	0.088 ha	0.01

5. Results and Conclusion

5.1 Results

The existing baseline value of the Application Site is:

- 0.07 habitat units;

The post development value of the Application Site is:

- 0.05 habitat units (-0.03 unit and -37.47% loss);

A screenshot of the headline results is given below. These results will be part of the overall BNG assessment for the Development.

Burgess Hill Full Application

Return to results menu

Headline Results

Scroll down for final results ▲

On-site baseline	Habitat units	0.07		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.05		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site net change (units & percentage)	Habitat units	-0.03	-37.47%	On-site net gain is less than target set ▲
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Off-site baseline	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	Habitat units	0.00	0.00%	
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.03		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.03		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-37.47%	Total net gain achieved is less than target set ▲	
	Hedgerow units	0.00%		
	Watercourse units	0.00%		
Trading rules satisfied?		No - Check Trading Summaries ▲		
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	0.07	0.08	0.04
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00
No additional hedgerow units required to meet target ✓				
No additional watercourse units required to meet target ✓				

5.2 Conclusions

The proposed habitat conditions have been based on assumptions regarding future management, which will be detailed in the Habitat Management and Maintenance Plan (HMMP) for the development. The proposed Wildflower Grassland (classified as 'other neutral grassland' in the Biodiversity Metric) has been assessed as achieving moderate condition, which requires specific management and ongoing monitoring to be maintained. Should the HMMP determine that achieving moderate condition is not feasible for this habitat within the scope of the works, the Metric will need to be re-run using a target condition of 'poor'. This would result in a reduction in the number of post-development units.

The Biodiversity Metric trading rules relating to the loss of baseline grassland habitats have been met through the creation of Other Neutral Grassland and the enhancement of Modified Grassland within the site. These interventions ensure an appropriate match in both habitat type and distinctiveness, supporting compliance with the trading rules for the loss of this habitat type.

However, the scheme does not achieve the minimum overall 10% net gain target for habitats, with a current outcome of -37.47%. This shortfall arises from the inability to compensate for the loss of the Urban Trees, with a habitat of the same broad type or higher distinctiveness within the site. Due to the constraints of the proposed layout, it is not feasible to replant the trees within the development footprint, nor is there sufficient opportunity to create compensatory habitat of a higher distinctiveness on-site.

As such, off-site provision is being sought to address the deficit. This is proposed to be achieved as part of the Wider Brookleigh Development BNG Delivery Strategy. Should no suitable off-site provision be secured, statutory biodiversity credits will be explored as a last resort.

Appendices

A. Habitat Condition Assessments - Baseline Habitats

Table A1: Baseline Modified Grassland Condition Assessment

Criteria	MG6	MG7
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.	Fail	Fail
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 vertebrates and invertebrates to live and breed.	Fail	Fail
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).	Pass	Pass
D Physical damage is 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.	Fail	Fail
E Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Pass	Pass
F Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Pass	Pass
G There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA).	Pass	Pass
Condition	Poor	Poor
Passes 6 or 7 criteria including passing essential criterion A - Good Passes 4 or 5 criteria including passing essential criterion A - Moderate Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A) - Poor		

Table A2: Baseline Urban Tree Condition Assessment

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

Appendices

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B. Habitat Condition Assessments – Proposed Habitats (Creation and Enhancement)

Table B1: Proposed Other Neutral Grassland Condition Assessment

Criteria	Pass/ Fail
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 Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Pass
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.	Pass
C Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	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 suboptimal 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.	Fail
Additional Criteria for non Acid Grassland Only	
F There are 10 or more vascular plant species per m2 present, including forbs that are characteristic of the habitat type Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	Pass
Condition	Moderate
Passes 5 or 6 criteria, including essential criterion A and additional criterion F - Good Passes 3 - 5 criteria, including essential criterion A - Moderate Passes 2 or fewer criteria; OR Passes 3 or 4 criteria excluding criterion A and F - Poor	

Appendices

Western Bridge and Link Road (WBLR) Phase 3 (Brookleigh, Burgess Hill)

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Table B2: Proposed Modified Grassland Condition Assessment

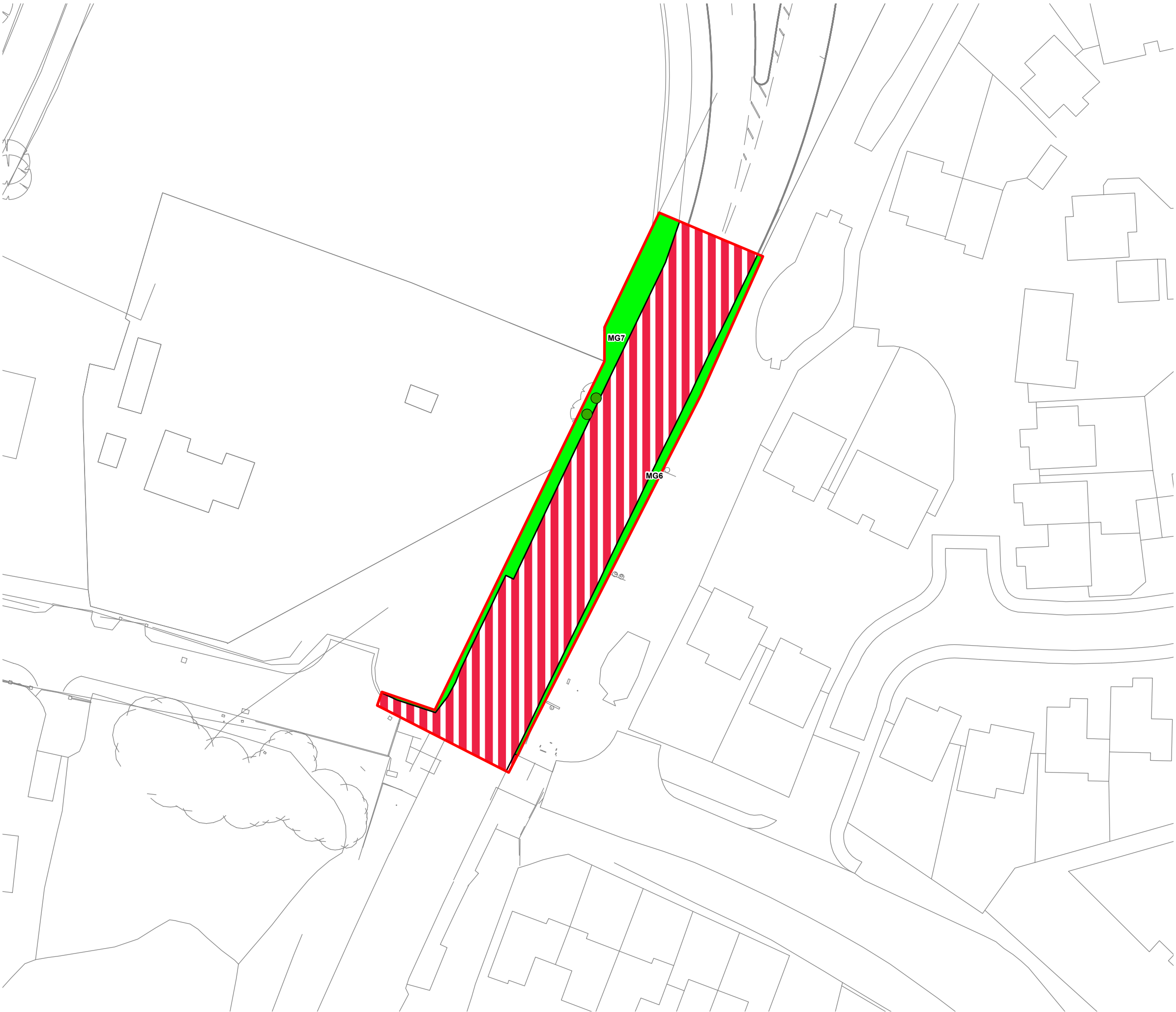
Criteria	MG6	MG7
A There are 6-8 vascular plant species per m ² present, including at least 2 forbs. Note - this criterion is essential for achieving Moderate or Good condition.	Pass	Pass
B Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Fail	Fail
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).	Pass	Pass
D Physical damage is 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.	Fail	Fail
E Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Pass	Pass
F Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Pass	Pass
G There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA).	Pass	Pass
Condition	Moderate	Moderate
Passes 6 or 7 criteria including passing essential criterion A - Good Passes 4 or 5 criteria including passing essential criterion A - Moderate Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A) - Poor		

Appendices

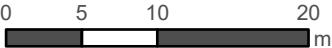
Figures

Figure 1 Baseline Habitats

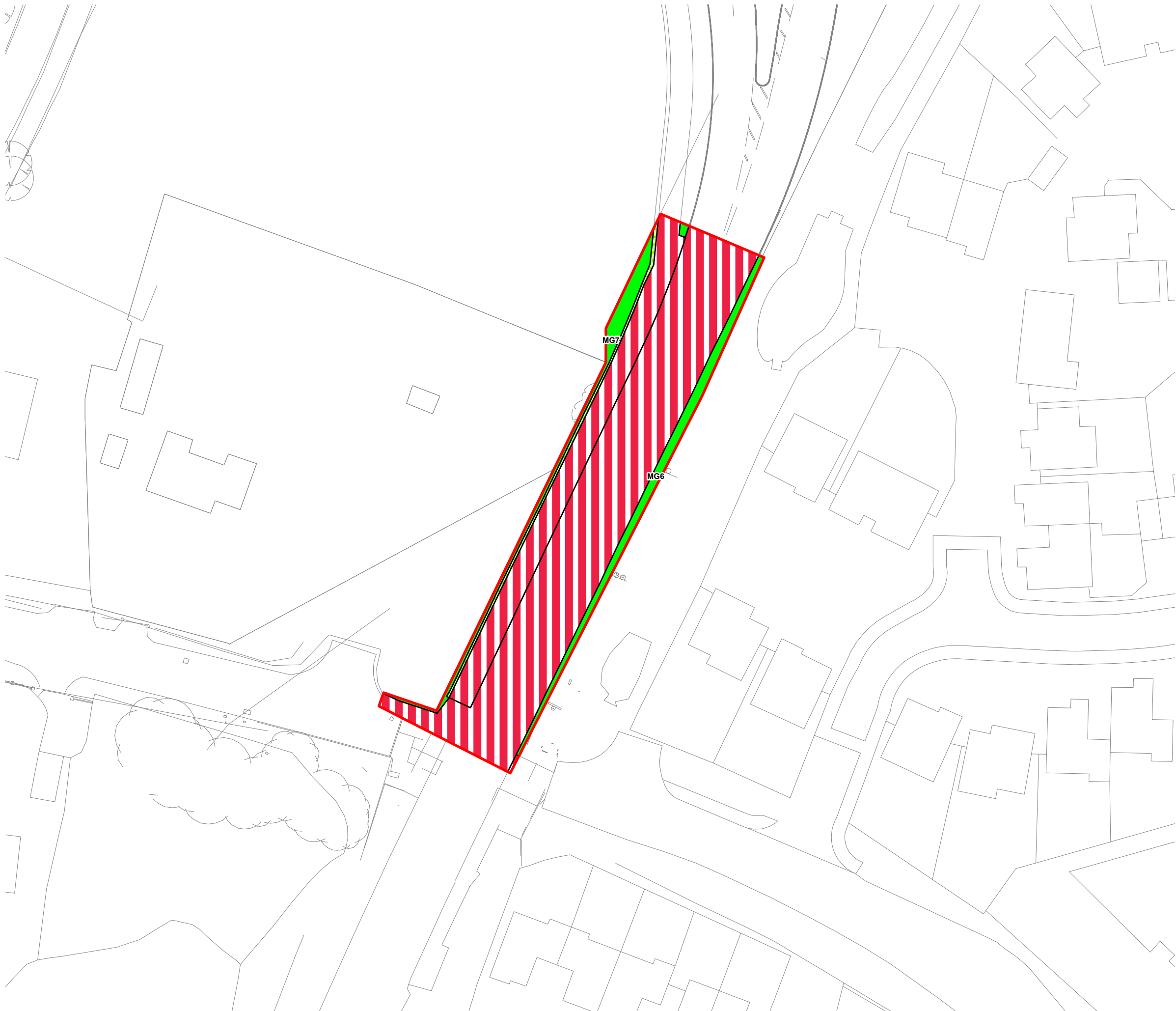
Figure 2 Post-Intervention Habitats



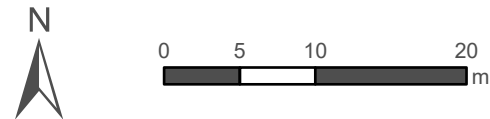
- WBLR Phase 3 Boundary (0.107Ha)
- Baseline Habitats**
- g4 - Modified grassland (0.021Ha)
- u1b - Developed land; sealed surface (0.086Ha)
- W1 202 Broadleaved and mixed woodland self-sown (2 No.)



Project Details	WIE19442-103: Burgess Hill
Figure Title	Figure 1: WBLR Phase 3 Baseline Habitats
Figure Ref	WIE19442-103_GIS_BNG_2_1A
Date	April 2025
File Location	WIE19442-103\@_GISWIE19442-103_GIS_EC
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- WBLR Phase 3 Boundary (0.107Ha)
- Post-Intervention Retained Existing Habitats**
- g4 - Modified grassland (0.012Ha)
- Post-Intervention Habitats Created / Enhanced**
- u1b - Developed land; sealed surface (0.093Ha)
- g3c - Other neutral grassland, SC 200 Tree (0.002Ha)
- g4 - Modified grassland (0.000Ha)



Project Details	WIE19442-103: Burgess Hill
Figure Title	Figure 2: WBLR Phase 3 Post-Intervention Habitats
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