

**Brookleigh Eastern Primary School,
Brookleigh, Burgess Hill**

Reserved Matters Application

Biodiversity Net Gain Design Report

Client



**Homes
England**

Project No

DARTS-OTH-88

Date

October 2025

CampbellReith

Multidisciplinary Consultants



Brookleigh Eastern Primary School, Burgess Hill

Biodiversity Net Gain Design Stage Report

Prepared For: Homes England

Document Reference: 10445.015

September 2025

Version 1.0

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Project Name	Brookleigh Eastern Primary School
Location	Burgess Hill, Sussex
Document Title	Ecological Impact Assessment Report
Client	Homes England

Prepared By	The Environment Partnership Ltd
Document Ref	10455.014
Version	1.0

Amendment History					
Version	Date	Modified by	Approved by	Reason	Status

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This report is considered valid up to 18 months from the date of assessment in accordance with CIEEM guidance.

The conclusions and recommendations contained in this document are based upon information gathered by TEP and provided by third parties. Information provided by third parties and referred to herein has not been independently verified by TEP, unless otherwise expressly stated in the document.

Nothing in this report constitutes legal opinion. If legal opinion is required, the advice of a qualified legal professional should be secured.

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Drawing 5: Habitat Impact (G10445.013)

Executive Summary

- 1.1 The Site is located within Phase 1 of the 'Brookleigh' development (formerly Northern Arc) and is to be the subject of a reserved matters application (RMA) pursuant to application DM/21/3279 (original reference DM/18/5114) for parcel P1.2 comprising of the construction of a primary school with nursery and special support centre, car parking, multi-use games area, playing fields, landscaping and associated infrastructure (hereafter referred to as 'the Site'). The Site covers 2.18 hectares (ha), although it should be noted that the area within the OPA metric measured 2.42 ha. The Site is in the Low Weald National Character and the Local Planning Authority is Mid Sussex District Council.

1. The BNG assessment results derived from the Defra Biodiversity Metric Version 2.0 were as follows:

On-site baseline	Habitat units	4.36
	Hedgerow units	0.00
	River units	0.00
On-site post-intervention (Including habitat retention, creation, enhancement & succession)	Habitat units	4.45
	Hedgerow units	0.00
	River units	0.00
Off-site baseline	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Off-site post-intervention (Including habitat retention, creation, enhancement & succession)	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Total net unit change (including all on-site & off-site habitat retention/creation)	Habitat units	0.09
	Hedgerow units	0.00
	River units	0.00
Total net % change (including all on-site & off-site habitat creation + retained habitats)	Habitat units	1.98%
	Hedgerow units	0.00%
	River units	0.00%

2. BNG Trading Rules are satisfied for medium and low distinctive habitats by the proposed development. There were no high or very high distinctiveness habitats present within the baseline or proposed post-development.
3. The baseline for the Site was taken to be that as reported for the Outline Planning Application (OPA); namely 2.18ha modified grassland of poor condition (noting the area discrepancy from the OPA). This reflects the position prior to the northern half of the Site being utilised for a temporary site compound for nearby plots within Phase 1 of the Brookleigh development.
4. The OPA BNG assessment for this plot calculated a net loss of 2.10 habitat units (-43.4%) in-isolation. The Design Stage BNG assessment recalculates a net gain of 0.09 habitat units, representing a gain of 1.98%. This represents a betterment in the detailed design

equivalent to 1.62 habitat units and therefore the proposals for the Site are considered to conform with the BNG requirements for the Brookleigh BNG development.

2.0 Introduction

Commission

- 2.1 The Environment Partnership (TEP) was commissioned by Homes England in January 2024 to undertake Biodiversity Net Gain (BNG) Assessment to support a reserved matters application to consider access, appearance, landscaping, layout and scale pursuant to application DM/21/3279 (original reference DM/18/5114) for parcel P1.2 comprising of the construction of a primary school with nursery and special support centre, car parking, multi-use games area, playing fields, landscaping and associated infrastructure (hereafter referred to as 'the Site').
- 2.2 The Site lies within Phase 1 (Plot P1.2) of the 'Brookleigh' development (formally Northern Arc) which forms an important part of the wider Burgess Hill Growth Programme and the Burgess Hill Town Wide Strategy. Brookleigh obtained Outline Planning Permission (DM/18/5114) in October 2019 for a comprehensive, phased, mixed-use development. The Outline Planning Application (OPA) was subject to an Environmental Impact Assessment (EIA), which was reported in an Environmental Statement (ES) and an ES Addendum (ESA) in 2018 and 2019 respectively. Approval of the details of the access, appearance, layout, scale and landscaping of the Brookleigh site were Reserved Matters.
- 2.3 This BNG Assessment has been undertaken to inform a Reserved Matters Application (RMA) for the Site, pursuant to the application DM/21/3279 (original reference DM/18/5114).
- 2.4 This BNG Assessment has used the Defra Metric Version 2.0 to conform with the Brookleigh Outline Planning Permission. All guidance and rules relevant to the Defra Metric Version 2.0¹ were applied. The completed Biodiversity Metric is provided separately (TEP Ref x10445.003) and should be viewed in conjunction with this report.

Proposed Development

Site Location

- 2.5 The Site is located off the A273 Isaac's Lane, Burgess Hill, at central grid reference TQ 30823 20741. The Site location is illustrated in **Figure 1**.

¹ <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>



Figure 1: Site location

Summary of Proposals

- 2.6 The Site is located within Phase 1 of the Brookleigh development, immediately to east of Isaac's Lane. The Site is identified on the Brookleigh masterplan as 'Primary School(PS) 1', as indicated on Figure 2.

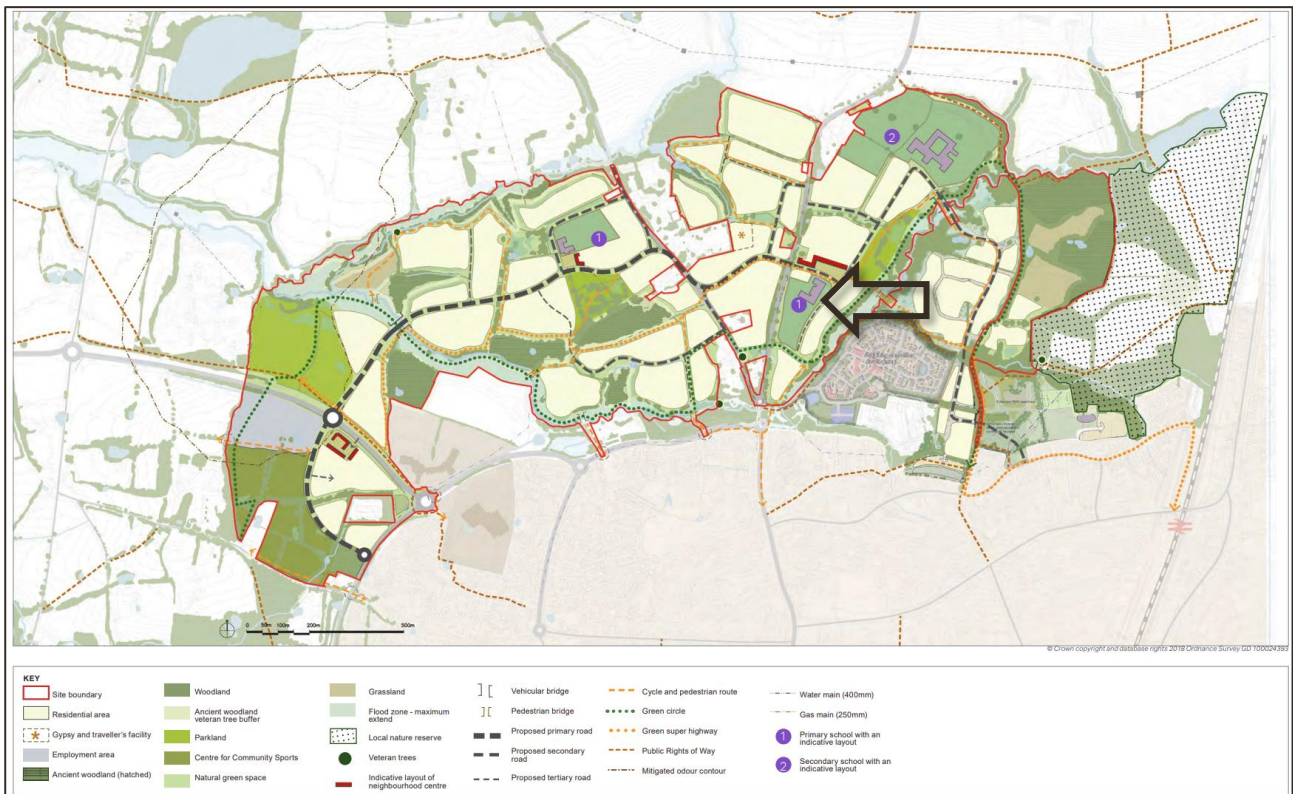


Figure 2: Brookleigh Masterplan, Burgess Hill (replicated from planning application DM/18/5114²), annotated with the black arrow to highlight 'Primary School 1'

2.7 A Reserved Matters Application is to be submitted for the primary school at the Site. The proposed layout, upon which this BNG assessment has been based, is illustrated at **Figure 3**.

²

https://padocs.midsussex.gov.uk/PublicAccess_Live/Document/ViewDocument?id=51BAF08BBF6011E9A2F2D89EF317549F

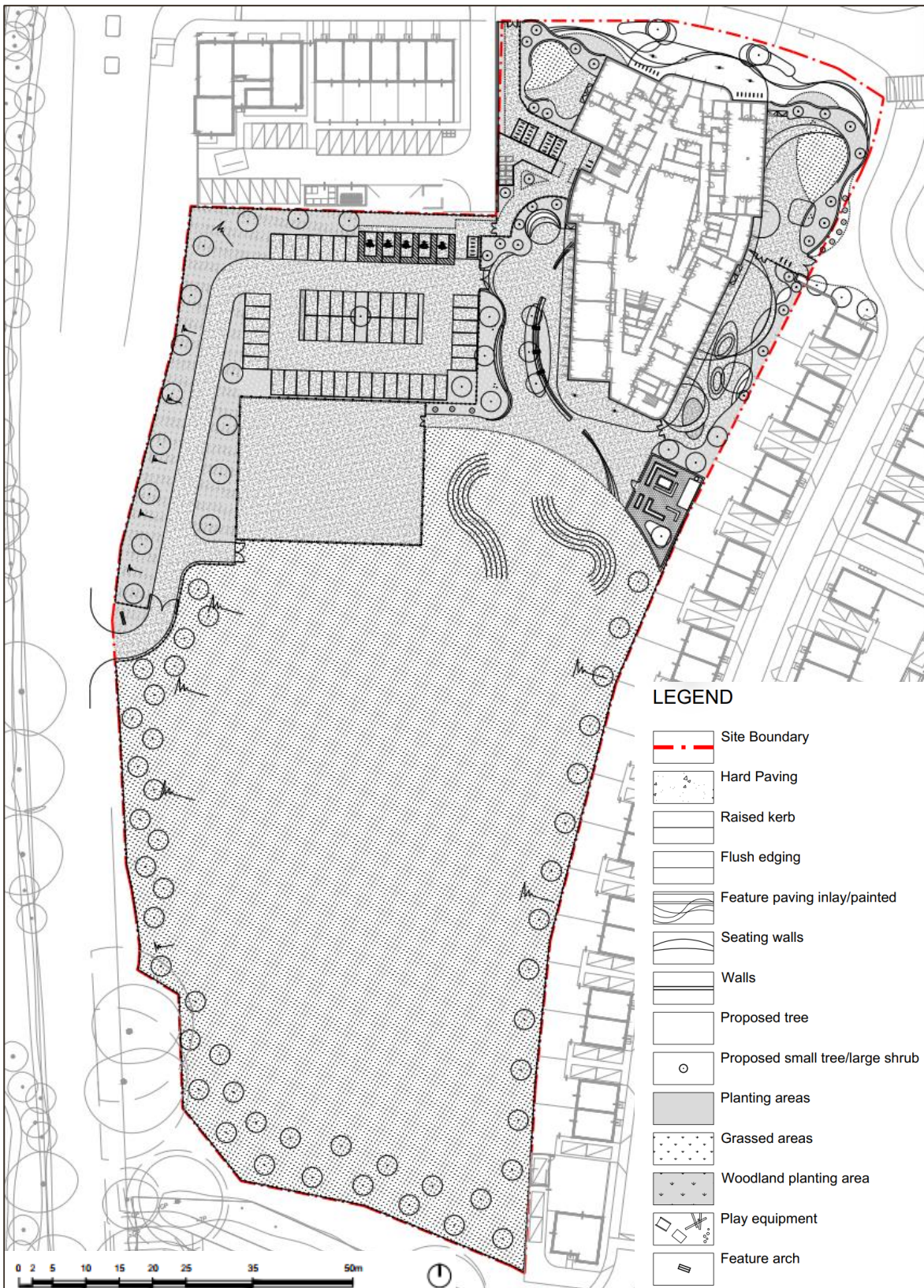


Figure 3: Proposed Layout (replicated from Fabrik drawing D3347-FAB-00-XX-DR-L-1005)

3.0 Methods

- 3.1 This BNG Assessment used the Defra Metric Version 2.0 to conform with the Brookleigh development BNG delivery strategy. Application of the same metric as applied for the Brookleigh OPA ensures alignment with and allows comparison to the BNG development parameters reported for the OPA stage (DM/18/5114).
- 3.2 The Defra Metric Version 2.0 method was followed, following guidance from Defra^{3,4} and joint guidance from CIEEM, IEMA and CIRIA⁵.
- 3.3 There were no hedgerows within the Site and the Site was not located within the riparian zone of any watercourses. Consequently only the area habitat module was completed for the BNG Assessment.

Baseline Habitats

- 3.4 At the time of preparing this BNG Assessment the Site, the northern half was being utilised for a temporary site compound for nearby plots within Phase 1 of the Brookleigh development. The Ecological Impact Assessment report (TEP Ref 10445.014) provides further information. For the purposes of this BNG Assessment however, the baseline was taken to be that as reported for the Brookleigh Outline Planning Application (OPA); namely 2.42ha modified grassland of poor condition.
- 3.5 Condition assessment was verified by calculating the condition of the grassland sward remaining in the southern half of the Site, applying the condition criteria for 'grassland habitat types' in the Defra Metric version 2.0 Technical Supplement.

Post-Development Habitats

- 3.6 Development proposals for the primary school and grounds are illustrated in Figure 3. Conversion of soft landscape planting and seeding types were discussed with the landscape architects (Fabrik).
- 3.7 Predicted habitat condition for post-development habitats was allocated based on the likely achievement of condition criteria set out in the DEFRA Metric 2.0 Technical Supplement, made in light of likely future management.

³ Ian Crosher, Susannah Gold, Max Heaver D, Matt Heydon, Lauren Moore, Stephen Panks, Sarah Scott, Dave Stone & Nick White (2019); The Biodiversity Metric 2.0: auditing and accounting for biodiversity value. User guide (Beta Version, 29th July 2019). Natural England

⁴ Ian Crosher, Susannah Gold, Max Heaver D, Matt Heydon, Lauren Moore, Stephen Panks, Sarah Scott, Dave Stone & Nick White (2019); The Biodiversity Metric 2.0: auditing and accounting for biodiversity value. Technical Supplement (Beta Version, 29th July 2019). Natural England

⁵ Julia Baker, Rachel Hoskin & Tom Butterworth (2019); Biodiversity Net Gain. Good practice principles for development: A practical guide. CIRIA, London

- 3.8 Post-development habitats and habitat condition were applied in the metric as follows:
- 'Proposed tree' and 'Proposed small tree/large shrub' were converted to 'urban - street tree' for which condition is pre-assigned by the condition assessment guidance;
 - 'Planting areas' were converted to 'urban - introduced shrub' for which condition is pre-assigned by the condition assessment guidance;
 - 'Grassland areas' were converted in the majority of the post-development landscape to 'urban - amenity grassland' for which condition is assigned as 'poor condition' in accordance with the condition assessment criteria;
 - Small areas of 'grassland areas' adjacent to the site access and car park and around the periphery of the playing field were converted to 'grassland - other neutral grassland' for which condition assessment was undertaken using the 'grassland habitat type' criteria;
 - 'Woodland planting area' is an error in the key as this habitat type was not included in the landscape proposals;
 - All other proposed landscape types were assumed to comprise urban - developed land, sealed surface (for which condition is pre-assigned by the condition assessment guidance).

Competency Statement

- 3.9 TEP surveyors meet the competency recommendations set out in British Standard 'Biodiversity — Code of practice for planning and development' BS 42020:2013. Habitat surveyors were accredited with Field Identification Skills Certification to at least Level 3 for UKHab survey and Level 4 for habitat condition assessment.
- 3.10 TEP BNG practitioners completing, checking and approving the BNG metric assessment meet the competency requirements of the British Standard 'Process for designing and implementing biodiversity net gain: BS 8683:2021.
- 3.11 Further evidence regarding competencies can be provided on request.

Limitations and Assumptions

- 3.12 The Biodiversity Metric accounts for some of the risks associated with the difficulty in creating or enhancing habitats and the time normally required for habitat type to establish and reach a target condition. None-the-less, post-intervention habitat conditions are indicative as they are dependent on the management of the post-intervention habitats to achieve and maintain the target condition.

4.0 Results

Baseline Habitats

- 4.1 The adopted habitat baseline is that recorded for the OPA stage. Baseline habitats are illustrated at **Drawing 1**. Habitat condition of baseline habitats is illustrated at Drawing 2.
- 4.2 The Baseline Habitat Unit Value for the Site is confirmed to remain unchanged from that reported for the OPA stage allowing for the discrepancy in area, summarised in **Table 1**.

Table 1: Baseline Habitats

Habitat	Area (ha)	Distinctiveness	Condition	Ecological Connectivity	Strategic Significance	Suggested action to address loss	Total habitat units
Grassland - Modified grassland	2.18	Low	Poor	Low	Low	Same distinctiveness or better habitat	4.36
Total Units							4.36

Post-Intervention Habitats

- 4.3 All baseline habitats are presumed to be lost. Post-intervention habitats are illustrated at Drawing 3. Habitat condition of post-intervention habitats is illustrated at Drawing 4.
- 4.4 Post-intervention habitat value calculated by the metric is summarised in **Table 2**.

Table 2: Post-Intervention Habitats

Habitat	Area (ha)	Distinctiveness	Condition	Ecological Connectivity	Strategic Significance	Habitat Units Delivered
Urban - Amenity grassland	0.85	Low	Poor	Low	Low	1.64
Urban - Developed land; sealed surface	0.77	Very Low	N/A - Other	Low	Low	0.00
Urban - Introduced shrub	0.11	Low	Poor	Low	Low	0.21
Urban - Street Tree	0.0475	Low	Moderate	Low	Low	0.07
Grassland - Other neutral grassland	0.34	Medium	Moderate	Low	Low	1.90
Grassland - Other neutral grassland	0.11	Medium	Moderate	Low	Low	0.62
Total Units						4.45

Habitat Balance

- 4.5 Habitat impacts are illustrated on **Drawing 5**. The habitat balance calculated by the BNG metric is a net gain of 0.09 habitat units, representing a gain of 1.98%.

Conformance

- 4.6 The habitat balance calculated for the Site represents a small gain of habitat units, compared with the loss of habitat units calculated for the plot at the OPA stage. The post-development biodiversity unit value predicted for the plot at the OPA stage was 2.74 habitat units. This BNG assessment recalculates post-intervention biodiversity unit value as 4.36 habitat units. This represents a betterment in the detailed design equivalent to 1.62 habitat units.

Opportunities for Enhancement

- 4.7 Opportunities exist in the proposed layout to further improvements to the habitat balance. Opportunities include:
- Use of façade planting (e.g against various walls within the proposed development) and raised planters (e.g. around car parking plots and as demarcation features between different zones within the school grounds);
 - Living roof features on the main building or any ancillary structures;
 - Orchard planting in addition to or in replacement of proposed individual tree planting;
 - Rain garden planting along transitions between hard standing and lawn areas;
 - Inclusion of a small pond or wet swale feature, for example at the toe of one of the peripheral banks around the west, east or south boundaries, which would ideally hold shallow water for at least part of the year but may not necessarily need to provide permanent open water.

5.0 Conclusions

- 5.1 A biodiversity assessment was completed using the Defra Metric Version 2.0 to quantify the change in biodiversity units between the baseline and post-development habitats for the proposed Brookleigh Primary School within the Brookleigh development

Summary of Biodiversity Impact

- 5.2 This BNG assessment recalculated the habitat change for the proposed development, resulting a net gain of 0.09 habitat units (equivalent to 1.98% gain).
- 5.3 This confirms a betterment upon the BNG calculations completed for the OPA stage of the Brookleigh development, which predicted a net loss of 2.10 habitat units (equivalent to - 43.4% net loss).

Trading Rules Summary

- 5.4 Trading Rules within the Defra Metric are satisfied.

Drawings

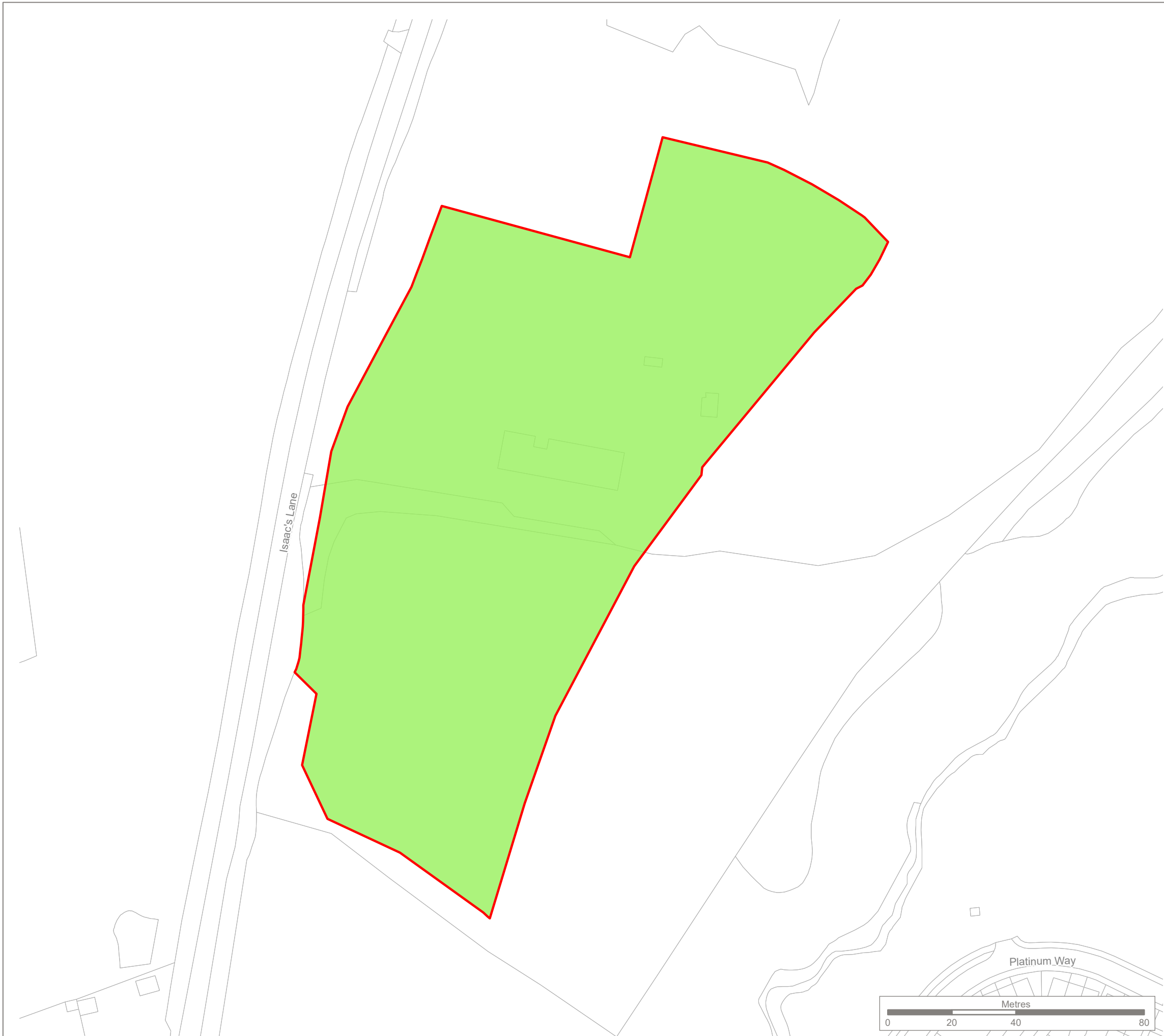
Drawing 1: Baseline Habitats - Outline Planning Application (G10445.014)

Drawing 2: Baseline Habitat Condition and Strategic Significance - Outline
Planning Application (G10445.010)

Drawing 3: Proposed Habitats (G10445.011)

Drawing 4: Proposed Habitat Condition and Strategic Significance
(G10445.012)

Drawing 5: Habitat Impact (G10445.013)



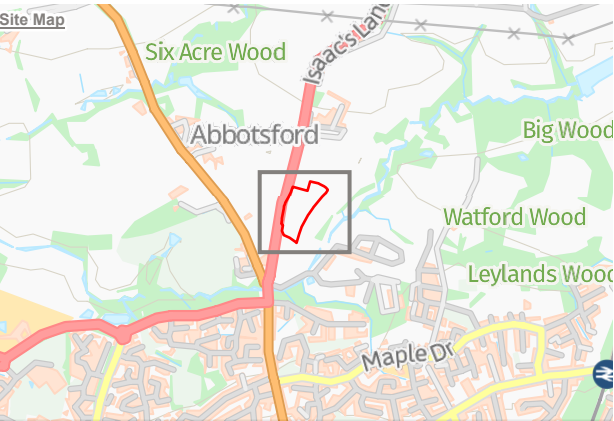
KEY

Site boundary

Modified grassland

Note:
The locations of habitats and habitat features are indicative.

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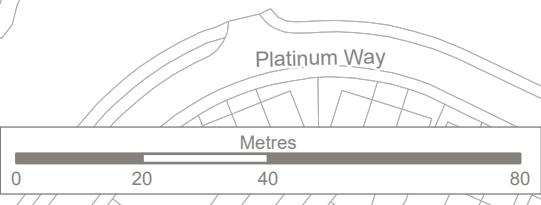
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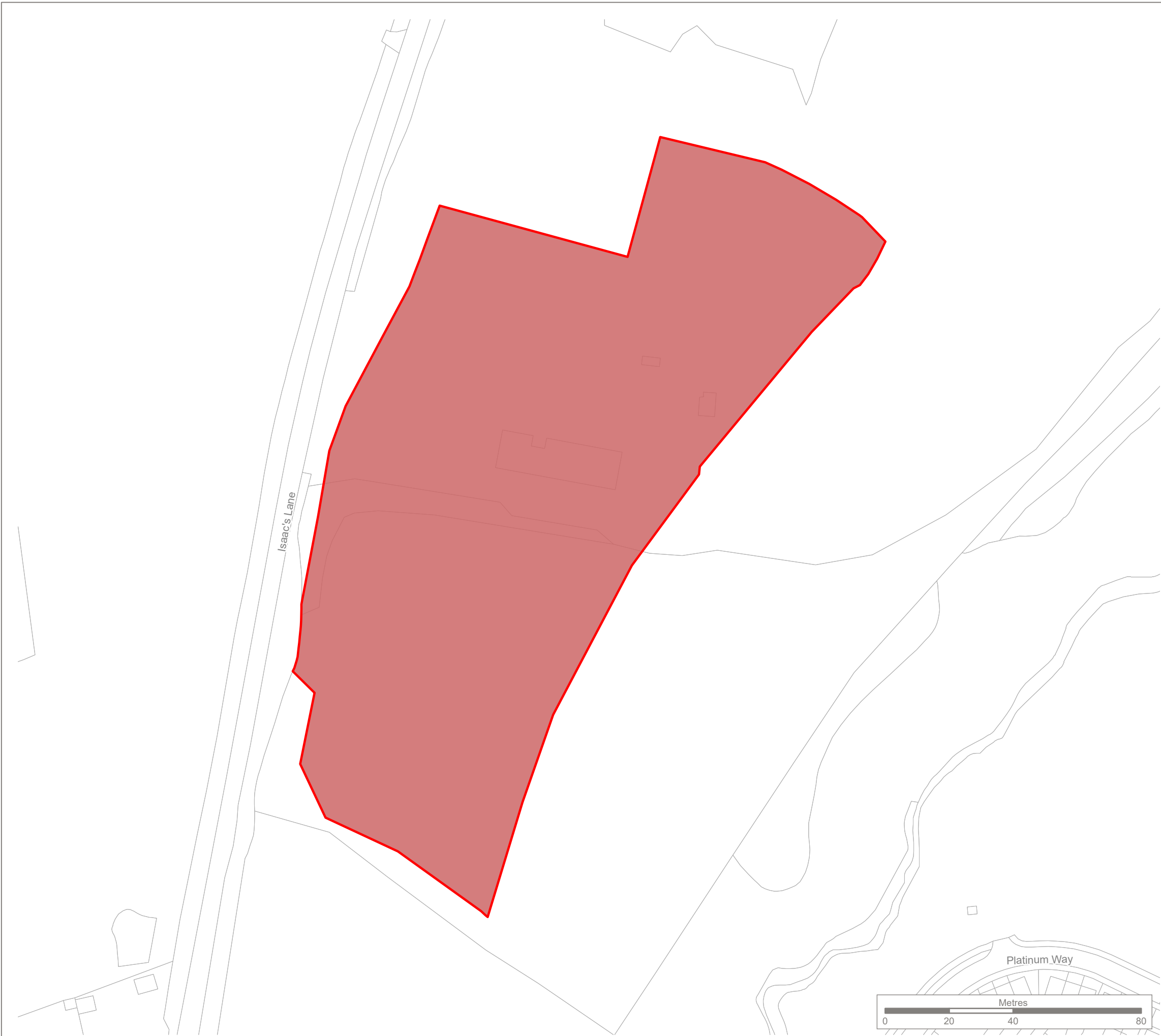
Project
Brookleigh Primary School

Title
**Baseline Habitats
Outline Planning Application**

Drawing Number
G10445.014

Drawn	Checked	Approved	Scale	Date
OH	BJ	AN	1:1,200 @ A3	17/09/2025





KEY

Site boundary

Habitat Condition

Poor

Strategic Significance

All habitats with strategic significance value of 'area/compensation not in local strategy/no local strategy'

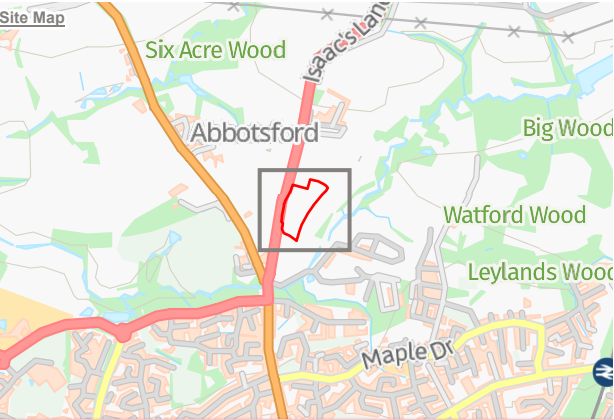
Note:

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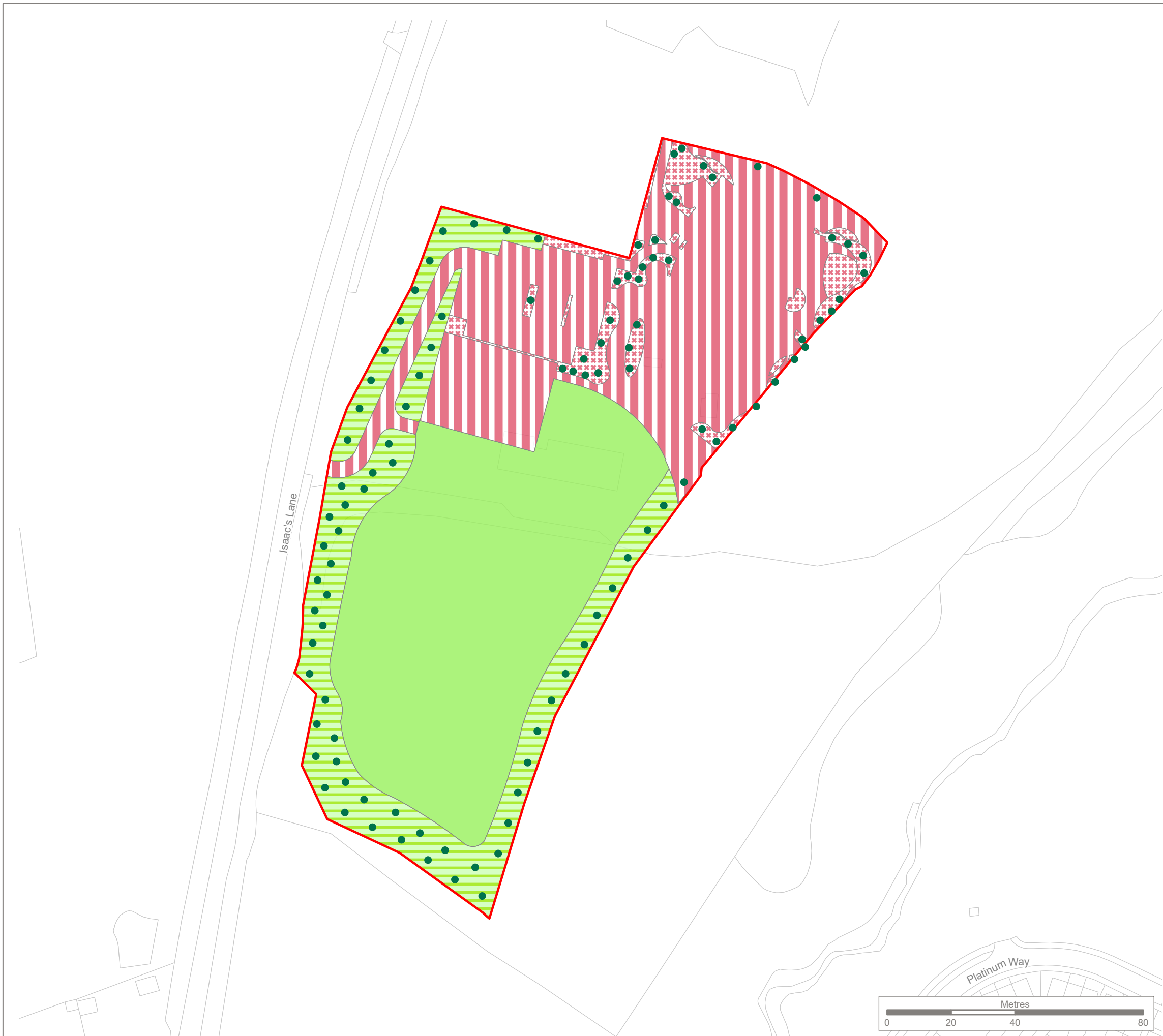
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Project
Brookleigh Primary School

Title
**Baseline Condition and Strategic Significance
Outline Planning Application**

Drawing Number
G10445.010

Drawn	Checked	Approved	Scale	Date
OH	BJ	AN	1:1,200 @ A3	17/09/2025

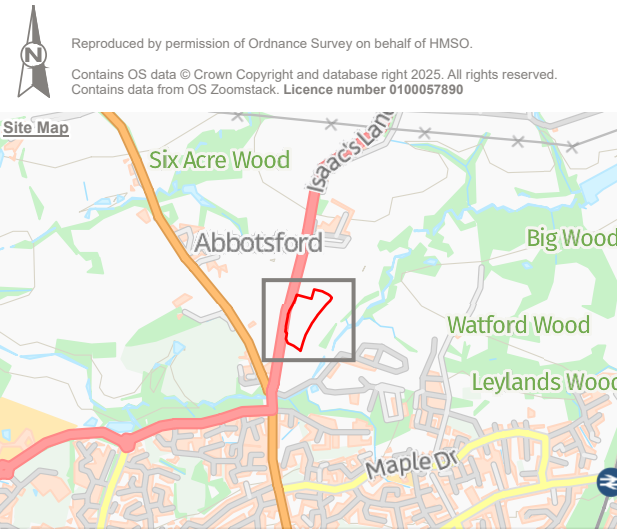


KEY

-  Site boundary
-  Urban tree
-  Modified grassland
-  Other neutral grassland
-  Developed land, sealed surface
-  Introduced shrub

Note:
The locations of habitats and habitat features are indicative.

Proposed layout based on drawing 'D3347-FAB-00-XX-DR-L-1005-Pr02' provided by the client.



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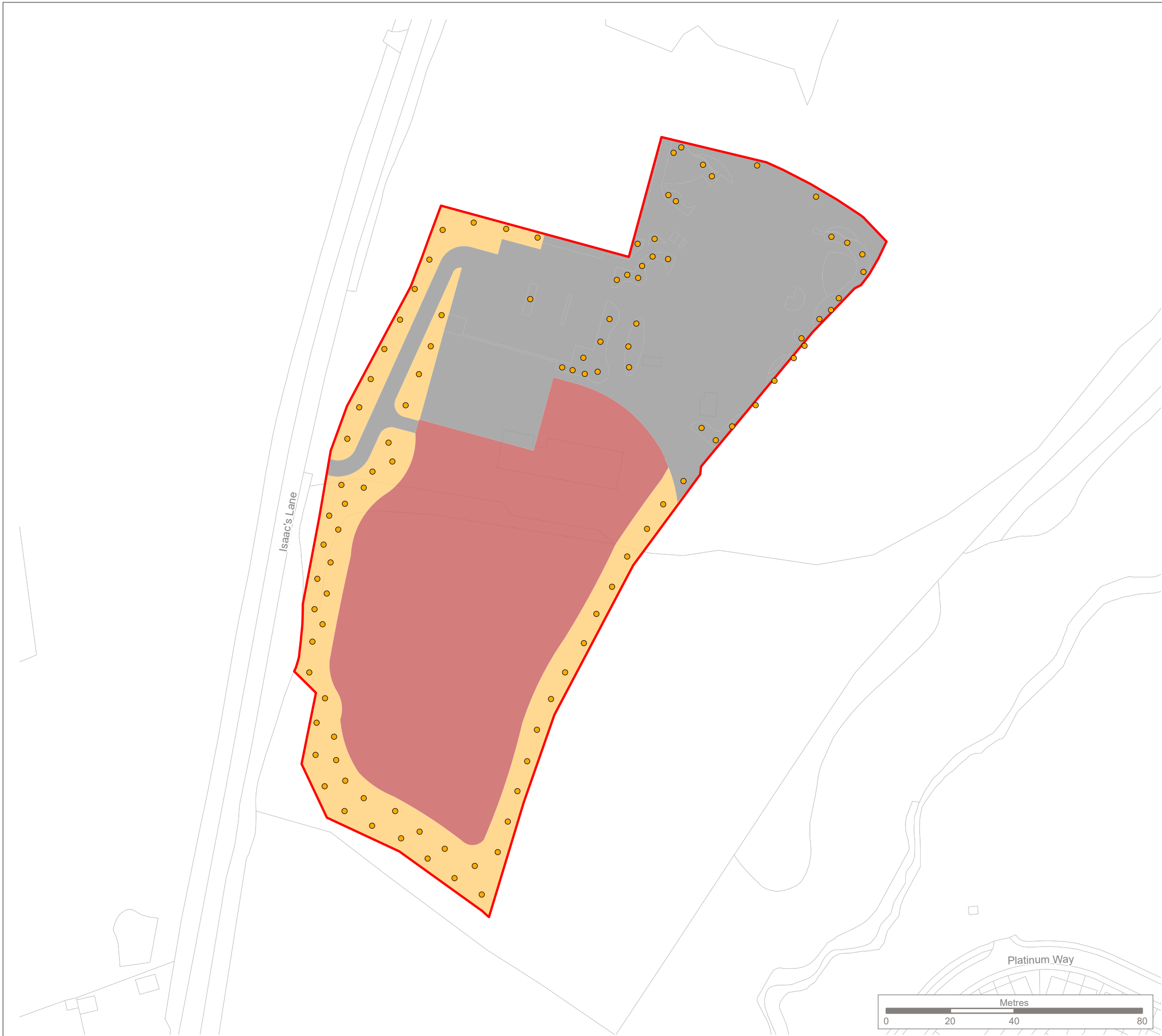
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Project
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Title
Proposed Habitats

Drawing Number
G10445.011

Drawn OH	Checked BJ	Approved AN	Scale 1:1,200 @ A3	Date 17/09/2025
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KEY

Site boundary

Individual Tree Condition

Moderate

Habitat Condition

Moderate

Poor

Not applicable - other

Strategic Significance

All habitats with strategic significance value of 'area/compensation not in local strategy/no local strategy'

Note:

The locations of habitats and habitat features are indicative.

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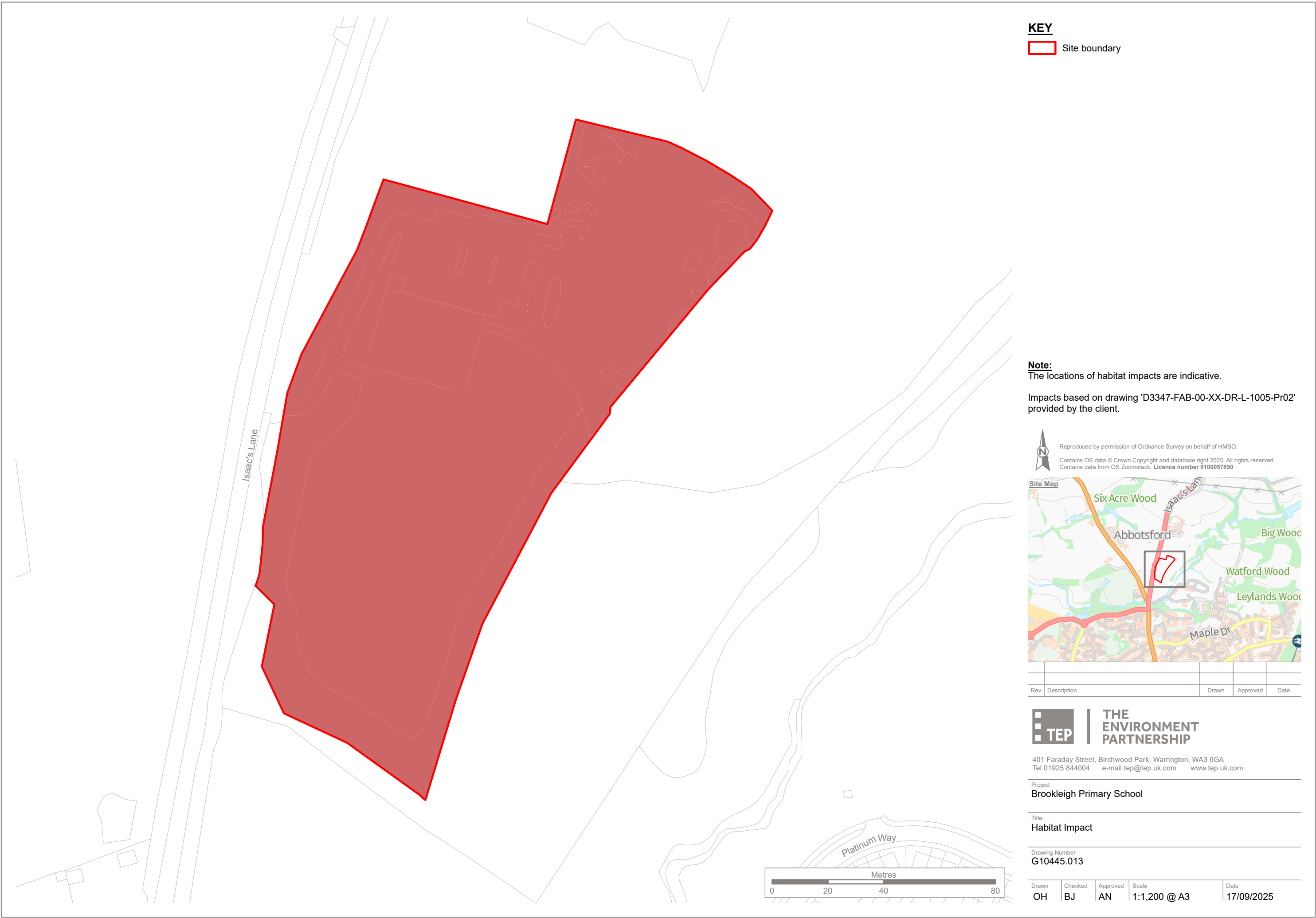
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Project
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Title
Proposed Condition and Strategic Significance

Drawing Number
G10445.012

Drawn	Checked	Approved	Scale	Date
OH	BJ	AN	1:1,200 @ A3	17/09/2025



KEY

Site boundary

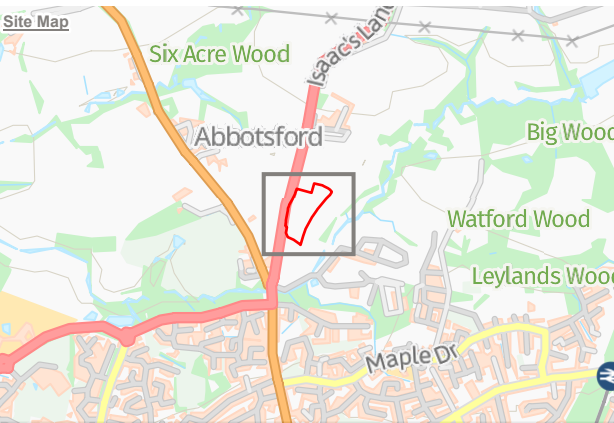
Note:
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Impacts based on drawing 'D3347-FAB-00-XX-DR-L-1005-Pr02' provided by the client.



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Site Map



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Project
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Title
Habitat Impact

Drawing Number
G10445.013

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OH	BJ	AN	1:1,200 @ A3	17/09/2025



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