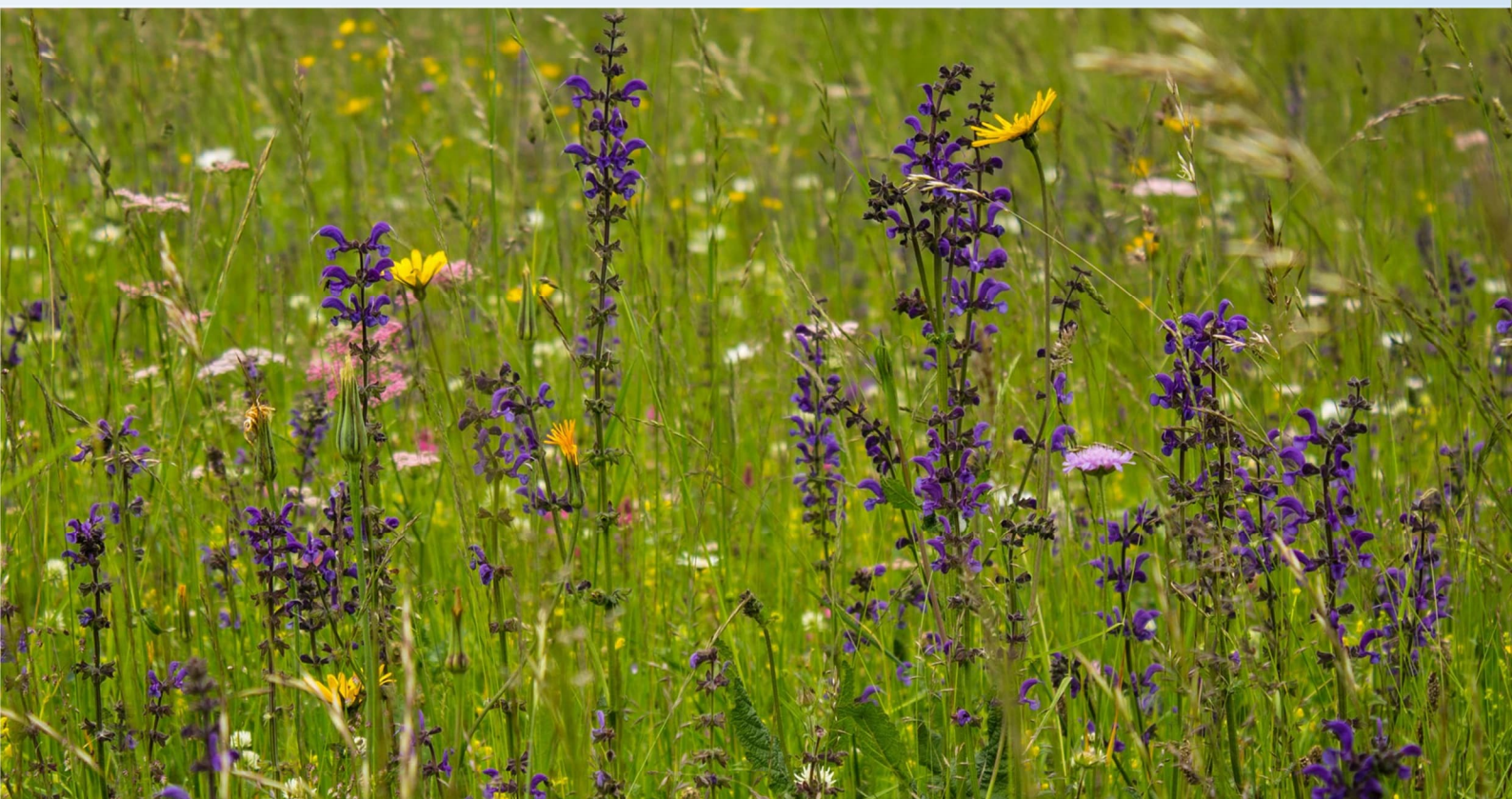




Homes England

WESTERN BRIDGE AND LINK ROAD PHASE 2, BURGESS HILL

Biodiversity Net Gain Design Stage Report





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Executive Summary

Consideration	Description	Reference(s) for further detail
Document purpose/scope	A Biodiversity Net Gain assessment to inform the habitat mitigation requirement for the proposed development of Phase 2 of the Western Bridge and Link Road and how it will contribute to the overall BNG assessment of the Northern Arc Allocation Site.	Section 1.1
Applicant	Jacksons Contractors Ltd on behalf of Homes England	Section 1.1
Competent person(s) completing the Biodiversity Net Gain (BNG) assessment	Isaac Lees First Floor 3 Wellington Place Leeds LS1 4AP	N/A
Description of the development and planning permission reference number (if available)	The proposed WBLR project is the creation of a new road which is broadly linear, comprising a 400m long strip of land located between the A2300 and northeast of the new bridge over the River Adur.	Section 1.2
Statement that the applicant believes that the project is subject to the biodiversity gain condition*	The Proposed Scheme meets the criteria for a BNG exemption, as defined by the Biodiversity Gain Requirements (Exemptions) Regulations 2024 as Outline Planning Approval DM/18/5114 was granted prior to mandatory BNG. However, Schedule 7 of the	Section 1.1

Consideration	Description	Reference(s) for further detail
	Section 106 agreements confirms the requirement of 10% BNG for the Proposed Scheme.	
Completed Statutory Biodiversity Metric tool provided*?	Biodiversity Metric 4.0 applied as per the date of the planning application (January 2023).	Appendix D
Baseline habitat map provided*?	Yes	Appendix A
Post-intervention habitat map provided*?	Yes	Appendix A
Total on-site baseline area (ha)	2.71ha	Section 3.3
Total on-site baseline length (km) of hedgerows/lines of trees	0.129km	Section 3.3
Total on-site baseline length (km) of watercourses	0.099km (to 3d.p)	Section 3.3
Relevant date for the pre-development (baseline) biodiversity value*	December 2018	Section 2.4
Baseline degradation*	Authorised habitat degradation is recorded as part of planning permission DM/20/0254. The relevant date is taken to be the date of the baseline survey data collected by the initial client in 2018.	Section 2.4
Irreplaceable habitats*	No irreplaceable habitats were identified on-site.	Section 3.2
Headline result: Estimated overall net change in biodiversity value	-10.33% net loss of area habitat units	See Figure 1 below this table for headline unit results.

Consideration	Description	Reference(s) for further detail
	-24.81% net loss of hedgerow units 0% net change of watercourse units	Results are further detailed in Section 3 .
Metric trading rules met	No, in isolation, this BNG assessment for the Phase 2 WBLR does not deliver the target of 10% biodiversity net gain. However, when assessed in combination with other phases of the NAAS development, it is envisaged that the BNG 10% target will be achieved as per Schedule 7 of the Section 106 agreement.	Trading summary per habitat provided in the Metric toolkit
Evidence of Biodiversity Gain Hierarchy application	The Proposed Scheme necessitates the complete removal of existing on-site habitats, making habitat loss unavoidable. All alternatives to avoid habitat loss were explored. Despite this, the design process has prioritised biodiversity outcomes from the outset, in line with the Biodiversity Gain Hierarchy. The hierarchy was applied by ensuring that recreation of habitats is prioritised on site, ahead of allocation of registered off-site gains. Off-site opportunities are to be explored with key stakeholders as part of a strategic delivery approach to the Outline Consent, with biodiversity credit purchase only considered as a last resort.	Sections 2.5 and 3.
Significant on-site enhancements	On-site habitat creation of medium distinctiveness	Section 3

Consideration	Description	Reference(s) for further detail
	habitats are likely to be classed as significant on-site enhancements and the maintenance of these habitats must be secured with a legal agreement or planning condition for the minimum 30-year period.	
Statutory biodiversity credits	Within the private habitat unit market, local providers are likely to be able to provide any offsetting required and statutory biodiversity credits are unlikely to be required.	N/A
Arrangements for habitat management and monitoring for 30 years.	The Client is committed to producing a 30-year Habitat management and Monitoring Plan (HMMP) for all habitats deemed 'significant on-site Enhancements' and agreed with the LPA.	Appendix F
Alignment with good practice	This BNG assessment has been undertaken in alignment with the most up-to-date good practice guidance.	Section 2.2 and Appendix C.
Summary of key assumptions and limitations	Key assumptions and limitations are detailed within Section 2.7.	Section 2.7
Summary of key recommendations	Key recommendations are detailed within Section 4.	Section 4

*Information that forms the minimum information legally required to accompany planning application submissions.

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Figure 1 – Headline Metric Results for the Proposed Scheme

FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.77		
	Hedgerow units	-0.29		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-10.33%		
	Hedgerow units	-24.81%		
	Watercourse units	0.00%		
Trading rules satisfied?	No - Check Trading Summaries ▲			
You must specify if irreplaceable habitats are on-site at baseline ▲				
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	7.43	8.17	1.51
Hedgerow units	10.00%	1.19	1.31	0.41
Watercourse units	10.00%	0.85	0.93	0.08

1 Introduction

1.1 Document Purpose

- 1.1.1. WSP has been commissioned by Jacksons Contractors Ltd on behalf of Homes England to undertake a Biodiversity Net Gain (BNG) assessment update to inform the habitat mitigation requirement for the proposed development of Phase 2 of the Western Bridge and Link Road (WBLR). Phase 2 WBLR forms part of a large residential development site at the Northern Arc Allocation Site (NAAS) in Burgess Hill, West Sussex.
- 1.1.2. The Proposed Scheme meets the criteria for a BNG exemption, as defined by the Biodiversity Gain Requirements (Exemptions) Regulations 2024, as Outline Planning Approval DM/18/5114 (herein referred to as the 'Outline Consent') was granted prior to mandatory BNG. Notwithstanding this, Homes England are required to deliver a minimum 10% BNG in accordance with the Biodiversity Objective secured through Schedule 7 the Section 106 (S106) agreement attached to the Outline Consent.
- 1.1.3. The BNG assessment and associated Biodiversity Metric 2.0 calculation submitted for the Outline Consent were undertaken by AECOM in 2018. planning obligation secured under Schedule 7 of the S106 agreement requires:
- The delivery of a minimum 10% BNG across the NAAS in accordance with the Biodiversity Objective;
 - Submission of phase-specific biodiversity assessments and metric calculations to support planning applications; and
 - Approval of Biodiversity Baseline Assessments by Mid Sussex District Council prior to commencement.
- 1.1.4. This assessment of BNG in relation to Phase 2 WBLR sets out how the Proposed Scheme contributes towards achieving the Biodiversity Objective for the Outline Consent which requires a minimum 10% net gain across the NAAS.
- 1.1.5. The purpose of this report is to update the Biodiversity Metric 4.0 calculation for Phase 2 of the Outline Consent and present its findings in support of the planning application. This report builds on the initial assessment prepared by WSP in 2024 and has been updated to reflect design changes to the Proposed Scheme and ongoing compliance with the Outline Consent Biodiversity Objective secured via the S106 agreement.

1.2 Project Background

- 1.2.1. The NAAS was identified in the Mid Sussex District Plan 2014-2031, policies DP7, 9 and 38. An Outline Planning Approval DM/18/5114 was granted for the mixed development site, comprising several development plots of up to 3,500 new dwellings, schools, shops, offices,

a link road and open space set within a green infrastructure network that will incorporate and retain existing habitat areas such as ancient woodland, hedgerows and a river valley.

- 1.2.2. Phase 2 of the NAAS area is approximately 2.71 hectares (ha) based on its design at the time of this assessment and is defined by the Proposed Scheme's Red Line Boundary (RLB) shown in **Appendix A**. This is hereafter referred to as "the Site".
- 1.2.3. The Proposed Scheme is defined as all land present within Site between a roundabout on the A2300 Dumbrells Farm Way, at approximate grid reference: E 529382, N 120325, and a point northeast of the River Adur at an approximate grid reference: E 529609, N 120656. The nearest postcode is RH15 8GA.

1.3 Biodiversity Net Gain Overview

- 1.3.1. BNG is defined by the Department for Environment, Food, & Rural Affairs (Defra) as an approach to development that makes sure that habitats for wildlife are left in a measurably better state than they were before the development (Defra, 2024a).
- 1.3.2. In England, a minimum 10% BNG is mandatory for major developments and small sites under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a). Although the Proposed Scheme is exempt from mandatory BNG, Schedule 7 of the S106 agreement confirms the requirement for 10% BNG.
- 1.3.3. Mid Sussex District Plan 2014-2031 (adopted 28 March 2018) sets out policies for development across the district. Relevant policies for this Proposed Development can be found in **Appendix B** and include:
 - DP7 General Principles for Strategic Development at Burgess Hill
 - DP9 Strategic allocation to the north and north-west of Burgess Hill
 - DP38 Biodiversity
- 1.3.4. The Northern Arc, Burgess Hill Masterplan Vision (AECOM, 2018) incorporates four themes, including protecting and enhancing the environment. Strategic development principles within the masterplan which were identified to be achieved throughout the NAAS area can be found in **Appendix B** and include:
 - SDP14 – Landscape and Green Infrastructure
 - SDP16 – Ancient Woodland and Veteran Trees
- 1.3.5. The BNG process follows the mitigation hierarchy, which sets out that everything possible must be done to firstly avoid, secondly minimise and thirdly restore/rehabilitate losses of biodiversity on-site. Only as a last resort, residual losses are compensated for using off-site habitat enhancement or creation (also known as biodiversity offsetting).
- 1.3.6. BNG also requires the application of the Biodiversity Gain Hierarchy (Defra, 2024b), which specifies that:

- first, in relation to on-site habitats which have a medium, high and very high distinctiveness (a score of four or more according to the biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and
- then, in relation to all on-site habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits.

- 1.3.7. BNG must be assessed by a competent person using the Biodiversity Metric and its associated rules and guidance (Defra, 2024c). This application has been assessed using Biodiversity Metric 4.0 (herein referred to as “the Metric”) in accordance with the version of the Metric live at the time of the initial planning application. The Metric accounts for habitat losses and gains resulting from development and quantifies the net change in biodiversity value, measured in ‘area habitat units’, ‘hedgerow units’ and ‘watercourse units’¹. The Metric guidance also states that up-to-date industry good practice principles (CIEEM, CIRIA & IEMA, 2016) and British Standard (BS) 8683:2021 (British Standards Institute, 2021) should be applied.
- 1.3.8. BNG cannot be applied to adverse effects on irreplaceable habitats (Defra, 2024e). BNG is additional to other legislative requirements relating to habitats and species, although mitigation/enhancement from certain schemes can count towards BNG either in full or in part (Defra, 2024f).

1.4 Scope of Report

- 1.4.1. Homes England have committed to a minimum 10% BNG target for the Proposed Scheme, in line with Schedule 7 the S106 agreement attached to the Outline Consent.
- 1.4.2. The remainder of this report and associated appendices describe the BNG assessment methods, results and recommendations for the following aspects of the Proposed Scheme, aligning with the Biodiversity Gain Hierarchy (Defra, 2024b):
1. The pre-development (baseline) biodiversity unit value of on-site area habitats, hedgerows/lines of trees and watercourses, calculated using the Metric.
 2. The estimated units to be retained, lost, enhanced, and created on-site, based on the Proposed Scheme’s design.
 3. The resulting overall net change in **on-site** biodiversity unit value (i.e., whether the Proposed Scheme achieves an on-site net loss, no net loss, or net gain in biodiversity units).

¹ The minimum 10% BNG target applies separately for each type of unit, and these cannot be summed or traded.

4. An estimate of the number and type of **off-site** units needed to reach 10% BNG based on modelling/assumptions.
 5. The overall result for the Proposed Scheme (including on-site and off-site measures), indicating whether the minimum 10% BNG target is estimated to be achieved.
- 1.4.3. It is important to recognise that BNG is one of several factors to be considered when assessing the impact of the Proposed Scheme on biodiversity. Please note that this BNG report does not cover potential impacts of the Proposed Scheme on protected species or, designated sites, although the BNG design has been aligned with these wherever possible. These aspects are covered within WSP (January 2023) Preliminary Ecological Appraisal Report Western Bridge Link Road Phase 3, Project No. ED/100377-15. Report No. WBLR-WSP-EXX-RP-L-0127 for Jackson Civil Engineering Group Ltd.
- 1.4.4. This assessment has been compiled with reference to relevant legislation and policy relating to nature conservation and BNG, listed in **Appendix B**.

2 Methodology

2.1 Quality Assurance

- 2.1.1. This report and the Metric calculation have been completed and quality assured by a team of ecologists competent in BNG, with 10 years' collective experience of BNG assessment, including ACIEEM.

2.2 Guidance and Tools

- 2.2.1. This BNG report and approach has applied the following guidance and tools:
- UK Government Biodiversity Net Gain Collection (Defra, 2024g);
 - Statutory Biodiversity Metric and associated user guidance (Defra, 2024c), including the associated rules and principles set out in the Metric User Guide;
 - Biodiversity Net Gain: Good Practice Principles for Development (CIEEM, CIRIA & IEMA, 2016). These are listed in Appendix C;
 - Biodiversity Net Gain: Good Practice Principles for Development – a Practical Guide (CIEEM, CIRIA & IEMA, 2019);
 - British Standard 8683 Process for designing and implementing Biodiversity Net Gain – Specification (2021) (British Standards Institute, 2021);
 - Biodiversity Net Gain Reporting and Audit Templates (CIEEM, 2021); and
 - Mid Sussex District Council (2018) - Mid Sussex District Plan 2014-2031.
 - Homes England (2018) - The Northern Arc, Burgess Hill Masterplan (2018) Vision.

2.3 Data Sources

- 2.3.1. The following data sources have been used to complete the Metric calculation:
- An initial desk study using publicly available Open-Source (Natural England, 2021) and local datasets to identify potential/likely Habitats of Principal Importance (HPI), irreplaceable habitats, and statutory and non-statutory designated sites for nature conservation. The desk study is further described within the PEA (WSP, 2023) and previous iteration of the BNG report (WSP, 2024).
 - A Phase 1 Habitat Survey Plan, published within Appendix 6-3 of the Environmental Statement Volume II (AECOM, 2018) was translated into UK Habitat Classification (UKHab) (UKHab, 2023) to provide baseline habitat data detailing habitat types present on-site, their area (ha) and/or length (km) and their geographic distribution based on data collected as part of the Outline Consent.

- Condition assessments were completed concurrently with the baseline habitat survey. Detailed condition assessments per individual habitat are provided within the supplementary datasets and documents (see **Appendix D**).
- A review of historical aerial imagery undertaken in July 2026 using Google Earth (2026) imagery to cross-check baseline surveys against existing habitats.
- A General Arrangement Plan (Drawing no. WBLR-WSP-HPN-04-DR-C-0223) indicating proposed locations of permanent infrastructure and associated landscaping based on the RLB shown in **Appendix A**. This plan informed post-intervention calculations and the post-intervention habitat map (Appendix A, Figure 2). Detailed habitat translations are provided in **Appendix E**.

2.4 Relevant Date for Pre-development Biodiversity Value (On-site Baseline)

- 2.4.1. The Metric calculation has been carried out based on the on-site baseline habitats present on the 'relevant date' (HM Government, 2021b). This was determined based on the date of the baseline habitat survey relating to the site location provided and whether authorised habitat degradation had been carried out since 25th August 2023 or unauthorised habitat degradation had been carried out since 30th January 2020.
- 2.4.2. Authorised degradation was recorded to areas of modified grassland in the south of the Site against the baseline habitat surveys used to inform this assessment. Degradation was permitted under planning permission DM/20/0254. As this degradation is permitted and baseline habitat surveys were undertaken as part of the Outline Consent, the relevant date is taken to be the date of these baseline habitat surveys, December 2018.

2.5 Biodiversity Gain Hierarchy

- 2.5.1. The Proposed Scheme has been designed in accordance with the Biodiversity Gain Hierarchy (Defra, 2024b). This has been achieved through engagement with the design process from an early stage and at key milestones, including feeding into discussions with engineers about the location of permanent / temporary works and RLB to avoid and minimise adverse impacts. All feasible opportunities for on-site enhancement and creation for BNG were then identified in collaboration with the engineers, land access team, landscape team and wider ecology team. Off-site opportunities are to be explored with key stakeholders/partners as part of a strategic approach to delivery, prior to sourcing remaining off-site units from the market.

2.6 Strategic Significance

- 2.6.1. Strategic significance of habitats has been assessed following the categories set out in Table 5-3 of the Metric 4.0 User Guide (Natural England, 2023) using the following documents, where relevant, as specified by West Sussex County Council, due to the absence of a published Local Nature Recovery Strategy (LNRS):

- Draft Local Nature Recovery Strategy
- Local Plans and Neighbourhood Plans
- Local Planning Authority Ecological Networks
- Tree Strategies and Woodland Strategies
- National Landscape Management Plans
- Biodiversity Action Plans
- Species conservation and protected sites strategies
- Green Infrastructure Strategies
- River Basin Management Plans
- Catchment Plans and Catchment Planning System

2.6.2. Habitats have been assigned a strategic significance score based on their location and habitat type. This has been applied to baseline and post-intervention habitats, as summarised in **Table 2-1**.

Table 2-1 – Strategic Significance Assignment

Strategic Significance	Habitats Assigned and Reasoning
High (Formally identified in local strategy)	Rural trees and Species-rich native hedgerow Policy DP37 Trees, Woodland and Hedgerow of the Mid Sussex Local Plan references support for the protection, enhancement and creation of trees, woodland but does not specify locations. Therefore, corresponding habitats are considered high strategic significance in accordance with Table 5-3 of the Metric User Guide.
Medium (Location ecologically desirable but not in local strategy)	No habitats
Low (Area not in a local strategy)	All remaining habitats No other habitats are included within local plans, strategy or policy and are therefore assigned as low strategic significance.

2.7 Limitations and Assumptions

2.7.1. It is assumed that no additional habitats indicated on the A4 Phase 1 Habitat plan used for this calculation are obscured by the symbology of any target notes, particularly in the vicinity of the river valley. The WSP Preliminary Ecological Appraisal Report (2023) does not identify any features or information that contradicts the Phase 1 Habitat plan.

- 2.7.2. Where the condition assessment range varies from that of the BNG condition assessment, i.e. the Ecus Tree Survey assesses condition using the range: poor, fair, good, trees assessed as in fair condition has been interpreted as equivalent to moderate condition in the BNG range.
- 2.7.3. After 30 years, the proposed planted trees are assumed to have achieved girths of 300mm or less and are therefore assumed as small trees of moderate condition in the post-development tab of the Metric.
- 2.7.4. This BNG assessment is based upon Biodiversity Metric version 4.0 to remain consistent with the Metric version available at the times of the planning application. Statutory Biodiversity Metric and associated guidance (Defra, 2023) was released in line with mandatory BNG in February 2024. There may be minor discrepancies between the results of this assessment and those that would be obtained using the latest Statutory Biodiversity Metric.
- 2.7.5. This BNG assessment is based on a Phase 1 Habitat survey completed by AECOM in December 2018, historical surveys and records referenced in **Appendix D**. No additional surveys have been undertaken to inform this update. As such, the assessment is based on the assumption that baseline habitats and associated condition assessments are consistent with that of the baseline habitat survey undertaken in December 2018.
- 2.7.6. The available Phase 1 Habitat Survey Plan was presented at 1:15000 scale at A4 size. In scaling up to identify the presence of baseline habitats and input into AutoCAD, it is likely that a minimal margin of error exists as habitat areas and linear features were not available in digitised form. The symbology for target notes and annotations obscured some areas of the survey plan. This is not deemed to have had a significant impact on the BNG assessment as AutoCAD was then interrogated against aerial imagery and professional judgement to determine the area and linear measurements of each habitat within the RLB.
- 2.7.7. Tree survey data (Ecus, 2021) was used to supplement the Phase 1 Habitat Survey (2018) data to provide species, size and condition information for individual trees, tree groups, woodlands and hedgerows. This tree survey data is assumed align with baseline habitats present on Site.
- 2.7.8. Part of Hedgerow H002 will be removed to facilitate construction works. Though the intent is to minimise the length removed and to protect the cut ends, for the purposes of the Metric a worst-case scenario is assumed that all H002 within the RLB will be removed.
- 2.7.9. The topographic survey indicates there is a ditch running parallel with Hedgerow HO2. This is not present within the Phase 1 Habitat Survey plan and has therefore not been included within this BNG assessment. This feature likely did not qualify as a wet ditch (dry for more than 4 months of the year) and as such was not included in AECOM (2018) survey.
- 2.7.10. No information regarding how biodiversity losses will be mitigated for the Proposed Scheme is provided at this stage to allow for design iteration across development phases of the



Outline Consent. It is therefore assumed that any off-site gains required will be achieved or sought through subsequent phases of the Outline Consent.

3 Results

- 3.1.1. This section provides a summary of results for the Proposed Scheme, including the on-site baseline and post-intervention biodiversity. Further detailed quantitative results are provided within the Metric (see **Appendix D**).

3.2 Irreplaceable habitats

- 3.2.1. Irreplaceable habitats (as defined in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 (HM Government, 2024a)) are treated differently within the statutory framework for BNG. Good practice (CIEEM, CIRIA & IEMA, 2019) recommends that an overall scheme-wide BNG cannot be achieved where there are losses of irreplaceable habitats, although mandatory net gain requirements will still be applied to remaining habitats.
- 3.2.2. No irreplaceable habitats were identified on-site. Ancient Woodland and Veteran Trees are present within the NAAS but are situated outside of the RLB for this application.
- 3.2.3. The design of the Site occupies a minimal footprint and has been carefully aligned to avoid and minimise disturbance and damage to Irreplaceable Habitats including nearby areas of Ancient Woodland.

3.3 On-site Baseline Biodiversity

- 3.3.1. A baseline habitat map is provided in **Appendix A, Figure 1**. A summary of baseline habitat units is provided in **Figure 3-1**. The total area covered by the Site boundary measures 2.71ha, accounting for 1.38% of the Outline Consent (188.34ha).
- 3.3.2. The habitats identified on Site prior to development vary in ecological value ranging from low to high distinctiveness. These habitats include cereal cropland and modified grassland (poor condition) of low distinctiveness; 8 small sized and 2 medium sized rural trees (moderate condition), mixed scrub (moderate condition) and species-rich native hedgerow (0.129km) (moderate condition) of medium distinctiveness; and other rivers and streams (0.099km) (fairly poor condition) of high distinctiveness.

3.4 On-site Post-intervention Biodiversity

- 3.4.1. An overview of the post-intervention biodiversity for the Proposed Scheme is provided below, in line with the Biodiversity Gain Hierarchy. The tabs (A-1, A-2, B-1 and C-1) within the accompanying Metric (see Appendix D) provide full quantitative details of on-site habitat retention, loss and creation.
- 3.4.2. A post-intervention habitat map is provided at Appendix A, Figure 2.

On-site Habitat Retention and Loss

- 3.4.3. All other rivers and stream habitat will be retained from pre- to post-development. As will the majority of mixed scrub and other neutral grassland present at baseline. All rural trees, most

of the modified grassland, most of the cereal crops and a small section of species-rich native hedgerow are expected to be lost as a result of the Proposed Scheme.

- 3.4.4. In accordance with the Biodiversity Gain Hierarchy, mitigation of habitat losses will be delivered, first via on-site habitat creation, and then via future phasing of the Outline Consent. Any off-site alternatives will be sought within the LPA and/or National Character Area (NCA) boundary where possible.

On-site Habitat Creation

- 3.4.5. The Proposed Scheme will result in the on-site creation of medium distinctiveness other neutral grassland and mixed scrub habitats. It will also deliver small areas of modified grassland and introduced shrub habitats, as well as 23 small sized rural trees. Despite this, much of the site will consist of developed land, sealed surface attributable to the development of hard infrastructure associated with the Proposed Scheme.

Significant On-site Enhancements

- 3.4.6. Habitat enhancement and creation measures that qualify as 'significant on-site enhancements' (Defra, 2024g) need to be legally secured (via planning condition, s106 agreement, or conservation covenant) and subject to a 30-year habitat management and monitoring plan (HMMP). These will need to be confirmed with the LPA prior to commencement as part of the final Biodiversity Gain Plan.
- 3.4.7. On-site habitat creation of medium distinctiveness habitats are likely to be classed as significant on-site enhancements and the maintenance of these habitats must be secured with a legal agreement or planning condition for the minimum 30-year period.

Trading Rules

- 3.4.8. Based on the on-site design, the Metric trading rules have not been met for all habitats.
- 3.4.9. Habitat types for which trading rules have not been met on-site include:
- Individual trees – rural tree (medium distinctiveness)
 - Species-rich native hedgerow (medium distinctiveness)
 - Grassland – modified grassland (low distinctiveness)
 - Cropland – cereal crops (low distinctiveness)

On-site Summary

- 3.4.10. Headline results for the on-site baseline units, on-site post-intervention units, and on-site net change are shown in **Figure 3-1**. Detailed results per individual habitat type, including habitat trading, can be viewed within the Metric toolkit (see Appendix D).
- 3.4.11. The on-site unit shortfall is proposed to be compensated through off-site measures including future phasing in line with the trading rules of the Metric. Off-site measures are discussed in Section 3.5.

Figure 3-1 – On-site Headline Results

On-site baseline	Habitat units	7.43		
	Hedgerow units	1.19		
	Watercourse units	0.97		
On-site post-intervention (including habitat retention, creation & enhancement)	Habitat units	6.66		
	Hedgerow units	0.89		
	Watercourse units	0.97		
On-site net change (units & percentage)	Habitat units	-0.77	-10.33%	On-site net gain is less than target set ▲
	Hedgerow units	-0.29	-24.81%	On-site net gain is less than target set ▲
	Watercourse units	0.00	0.00%	On-site net gain is less than target set ▲

3.5 Off-site Biodiversity

- 3.5.1. This section provides a summary estimate of the number and type of off-site units needed to achieve 10% BNG based on modelling/assumptions described in Section 2.7. Details are to be discussed as to how this will be delivered across the wider Outline Consent.

Off-site BNG Modelling

- 3.5.2. 1.51 area habitat units, 0.41 hedgerow units and 0.08 watercourse units are required to meet the 10% BNG requirement for this application and should be delivered as part of future phases of the wider scheme.

3.6 Statutory Biodiversity Credits

- 3.6.1. The outline planning application is a pre-mandatory BNG project and statutory biodiversity credits cannot be used. However, within the private habitat unit market, local providers are likely to be able to provide any additional offsetting if required.

4 Recommendations and Next Steps

- 4.1.1. It is envisaged that this BNG assessment will be taken into account as part of the wider NAAS development, with the overall target of 10% achieved across the wider scheme. The NAAS scheme and associated BNG report will inform the biodiversity net gain management and monitoring plan for the wider Northern Arc.
- 4.1.2. The approved planning application DM/20/2418 for the discharge of the planning condition relating to DM/18/5114 in relation to the S106 agreement, paragraph 1.2, Schedule 7, Burgess Hill Northern Arc, was accompanied by the report, AECOM (November 2020) Northern Arc Allocation: Biodiversity Scheme, Project number 60610807, prepared for Homes England. The AECOM (November 2020) Biodiversity Scheme report includes proposed ecological mitigation measures for the whole NAAS, which are illustrated across several drawings in Appendix D – Figures. One of these figures is reproduced as an example in Figure 2 of this BNG assessment.
- 4.1.3. The NAAS-wide mitigation measures include habitat enhancements for grassland, ancient woodland, ponds and habitat mitigation measures for wildlife including bats, hazel dormouse, great crested newts, birds, reptiles and other wildlife. The 1:12000 scale A4 drawings indicate some mitigation measures within the Phase 2 WBLR RLB. Habitat creation measures are proposed for the SW corner of the eastern bridge, including species-rich grassland and the planting of native shrubs, likely combined with some lower-growing non-native pollinator friendly shrubs (for the purpose of enabling passive surveillance where native shrubs may conceal areas). All proposed trees along the route will be native, and the highway verges along this section of the Northern Arc road are proposed to be wildflower-rich in accordance with the NAAS masterplan. It is proposed that highways verges will be UKHab 'Other Neutral Grassland' habitat, to allow for the development of a robust sward.
- 4.1.4. The provision of species-rich grassland areas, trees and native shrubs within the Phase 2 WBLR scheme will contribute towards these mitigation measures.
- 4.1.5. This BNG assessment and accompanying proposals will contribute to the delivery of the approved biodiversity scheme (DM/20/2418) and towards the BNG assessment for the whole NAAS.

Biodiversity Progress and Monitoring

- 4.1.6. Schedule 7 of the S106 agreement for DM/18/5114 places an obligation upon the Owner to achieve the Biodiversity Objective², to implement the approved Biodiversity Scheme, to submit Biodiversity Progress Report(s) at specific intervals during the development of the

² Biodiversity Objective is defined by the S106 agreement as “the objective to secure at the Land by the Biodiversity Objective Date a net gain of ten per cent (10%) in biodiversity compared with the Baseline Biodiversity Value as determined in accordance with the Defra Biodiversity Metric 2.0 (2019) or such replacement metric as may be published by Defra...”

NAAS, and to submit a Biodiversity Final Report at the Biodiversity Objective Date; and if there is a shortfall in biodiversity value, to implement measures to secure the Biodiversity Objective as soon as reasonably practicable.

Habitat Management and Monitoring Plan

- 4.1.7. Schedule 7 also requires the submission and approval of a Habitat Management and Monitoring Plan (HMMP) for each sub-phase of the NAAS development prior to commencement and for its implementation.
- 4.1.8. The S106 agreement (page 18) states that the HMMP shall comprise:
- “Ecological surveys of the relevant sub-phase (which shall have been carried out no longer than twenty-four (24) months prior to submission of the HMMP);
 - The mitigation measures stated as being included in the HMMP in Table 16-1 ‘Summary of Mitigation Measures from within the Technical ES Chapters’, Chapter 16 Mitigation Register, of the Environmental Statement Volume 1 (December 2018) submitted to the District Council in support of the Application;
 - Measures to protect habitats, species and water quality along river corridors and within water quality ponds;
 - Habitat compensation and enhancement measures and long-term management provisions, including aims and objectives, to maintain and increase future biodiversity which measures and management provisions shall support the Biodiversity Scheme;
 - Initial management prescriptions and provisions for monitoring to feed into the review and updating of management prescriptions;
 - Information on funding sources, and organisations responsible for implementation and updating of the management plan so that it becomes an evolving, working document; and
 - Details of the long-term monitoring and management of the green infrastructure throughout the Development.”
- 4.1.9. Schedule 7 also requires the submission of “a report demonstrating the effective implementation of the HMMP” prior to the occupation of 75% of the development within each sub phase and for its approval by the District Council prior to occupation of 75% of the development within each sub-phase.
- 4.1.10. As it is not possible to determine 75% occupation of Phase 2 WBLR, the progress report on the effective implementation of the HMMP shall be submitted for Phase 2 WBLR at a date to be agreed with the District Council.
- 4.1.11. To achieve the Biodiversity Objective by the Biodiversity Objective Date which is 25 years after the Commencement of the Development, the HMMP shall include the construction period, planting and implementation of biodiversity measures, establishment and aftercare until the Biodiversity Objective Date.

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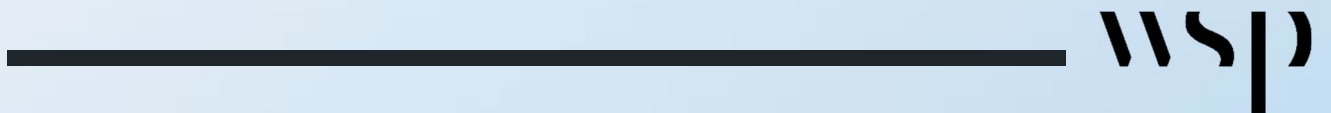
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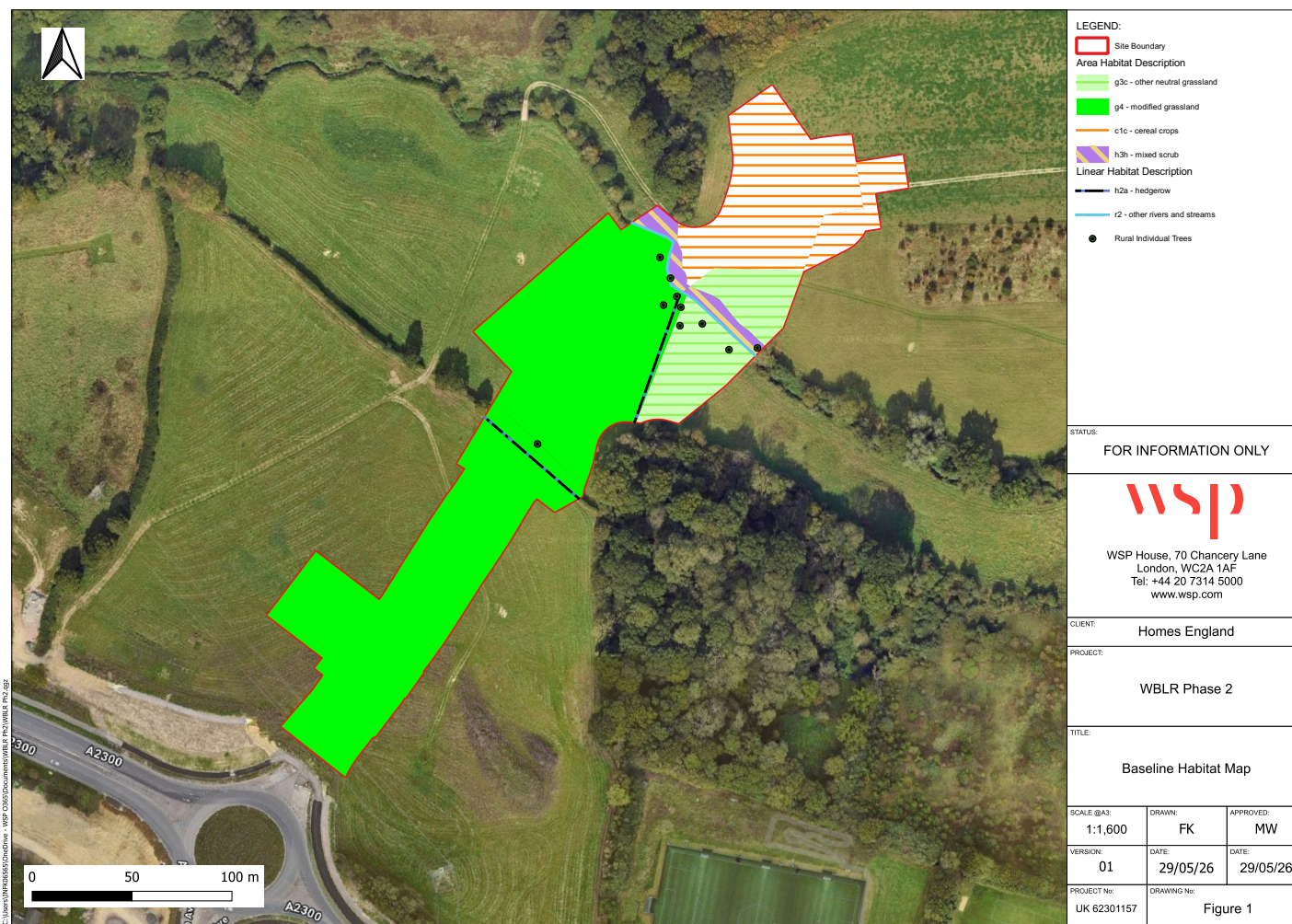
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Appendix A

Baseline and Post-intervention
Habitat Maps



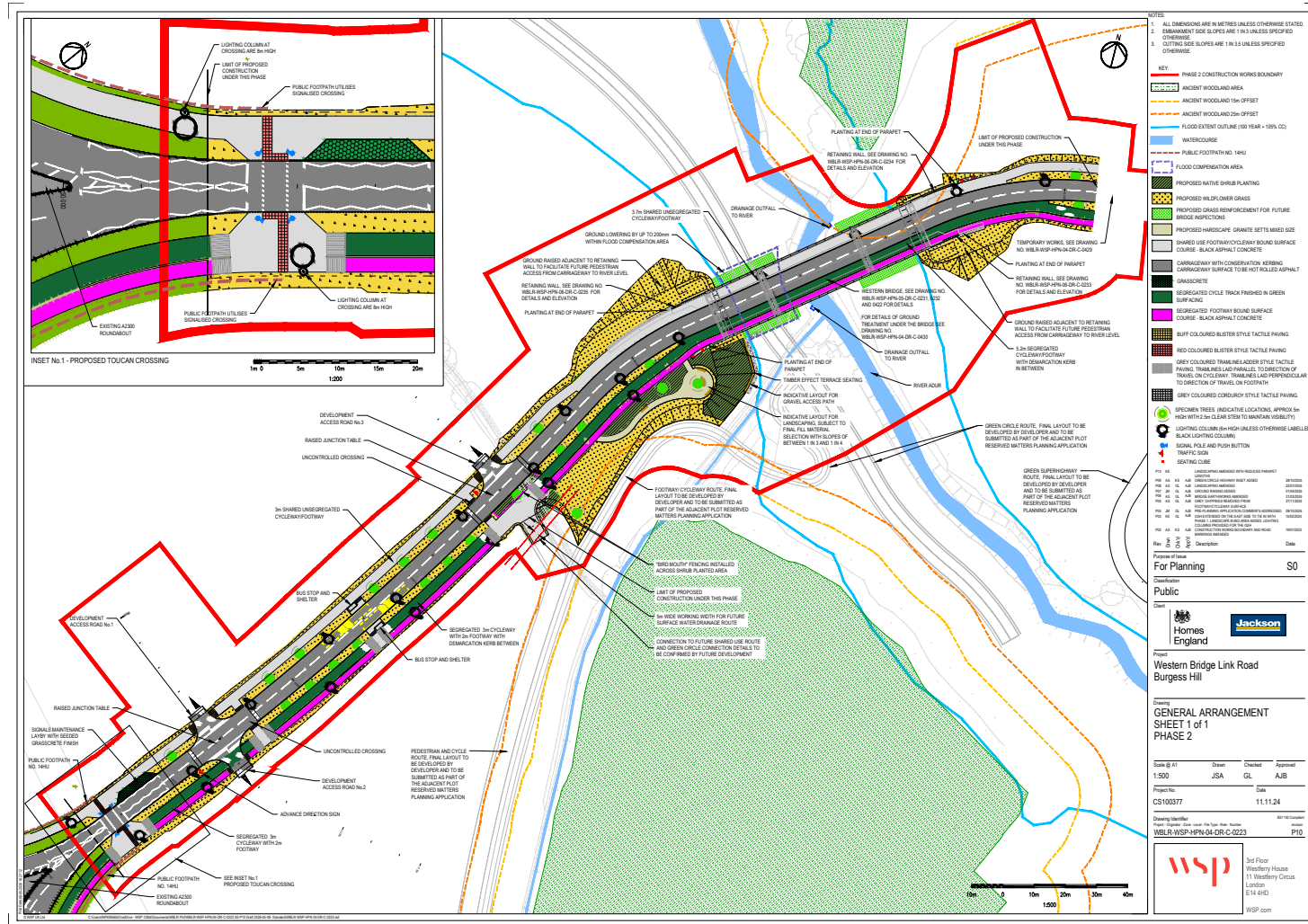
Appendix A, Figure 1 – Baseline Habitat Map



Appendix A, Figure 2 – Post-intervention Habitat Map

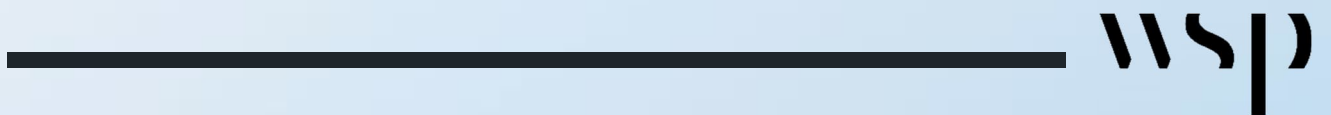


Appendix A, Figure 3 – General Arrangement Plan



Appendix B

BNG Legislation & Policy



Appendix B – BNG Legislation and Policy

National legislation

England

Environment Act 2021

BNG is mandatory under Schedule 7a of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a). This means that most major developments (with exemptions) must deliver a minimum of 10% net gain for biodiversity as a condition of planning permission, measured by the Statutory Biodiversity Metric. There are six statutory instruments that work together to deliver the BNG framework including:

- The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2023 (HM Government, 2024e);
- The Biodiversity Gain Sites Register (Financial Penalties and Fees) Regulations 2023 (HM Government, 2023a);
- The Biodiversity Gain Site Register Regulations 2024 (HM Government, 2024f) ;
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (HM Government, 2024b);
- The Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024 (HM Government, 2024a); and
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 (HM Government, 2024d).

Under mandatory BNG, the Biodiversity Gain Hierarchy must be considered by LPAs when determining whether to approve a Biodiversity Gain Plan. Here, efforts must be made to first avoid then minimise adverse impacts in relation to on-site medium, high and very high distinctiveness habitats. Secondly, any adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits. All significant on-site gains and all off-site gains from a development must be legally secured, managed and maintained for a period of 30 years.

Mandatory BNG does not replace existing legislations and protections for sites, habitats and species.

The Environment Act 2021 also amended the Natural Environment and Rural Communities (NERC) Act 2006 (HM Government, 2006). This amendment extended the duty of public authorities (the 'Biodiversity Duty') beyond the original NERC Act, which referred only to

conservation, so that it included the enhancement of biodiversity in England. Further description of the NERC Act is provided below.

All government policy and guidance are collated under the Biodiversity Net Gain Collection (Defra, 2024g).

UK Government's Environmental Improvement Plan

Biodiversity Net Gain is a key cross-cutting theme to deliver the environmental targets and commitments set out in the Government's Environmental Improvement Plan (Defra, 2023a).

National Planning Policy Framework

The revised National Planning Policy Framework (NPPF) (HM Government, 2024g) refers to conserving and enhancing the natural environment. This requires Local Authorities in England to take measures to:

- Conserve and enhance biodiversity;
- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks within plans;
- Promote the conservation, restoration and enhancement of priority habitats, ecological networks and priority species within plans, in addition to secure measurable net gains for biodiversity; and
- Refuse planning permission for development, if significant harm resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for.

The revised NPPF refers to biodiversity and environmental net gains in the following paragraphs:

- Transport Infrastructure:
 - Paragraph 109. *"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
 - d) the environmental impacts of traffic and transport infrastructure can be identified assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for **net environmental gains.**"*
- Planning decisions
 - Paragraph 125. *"Planning policies and decisions should a) encourage multiple benefits from both urban and rural land ... and taking opportunities to **achieve net environmental gains - such as developments that would enable new habitat creation or improve public access to the countryside.**"*

- Paragraph 187. *“Planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.”*
- Paragraph 192. *“To protect and enhance biodiversity and geodiversity plans should b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing **measurable net gains for biodiversity**.”*
- Paragraph 193. *“When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; ... and d) ... “ development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can **secure measurable net gains for biodiversity** or enhance public access to nature where this is appropriate”.*

National Policy Statements

After January 2024, the achievement of 10% biodiversity net gain (BNG) will become a mandatory requirement within the planning system in England under the Environment Act 2021.

This BNG assessment has been undertaken using Natural England's Biodiversity Metric 4.0 Calculation Tool³, following the accompanying guidance provided in the Biodiversity Metric 4.0 User Guide⁴. Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities (NERC) Act (HM Government, 2006) requires public bodies, including local authorities, *‘to have regard to the conservation of biodiversity in England when carrying out their normal functions’*.

Section 40 sets out the ‘Duty to Conserve and Enhance Biodiversity’, and states that:

- Paragraph 1. *“A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective”. The general biodiversity objective is the “conservation and enhancement of biodiversity in England”.*

³ Natural England (2023) The Biodiversity Metric 4.0 Calculation Tool

⁴ Natural England (2023) JP039 The Biodiversity Metric 4.0 User Guide

Section 41 sets out that:

- Paragraph 1. *“The Secretary of State must... publish a list of the living organisms and types of habitat ... of principal importance for the purpose of conserving biodiversity”* based on consultation with Natural England; and that
- Paragraph 3a. The Secretary of State must *“a) take such steps... to further the conservation of the living organisms and types of habitat included in any list published under this section, or (b) promote the taking by others of such steps”*.

Local BNG Policy

REGIONAL

West Sussex County Council (June 2023), Council Plan 2021-2025 Version 9 (page 9) states:

“we will also play a key role in influencing others to make the right choice and encourage and enable the community and businesses to innovate and make decisions which... promote nature recovery and biodiversity.”

Mid Sussex District Plan 2014-2031 (adopted 28 March 2018) sets out policies for development across the district. Relevant policies for this Proposed Development include:

- DP7 General Principles for Strategic Development at Burgess Hill
- DP9 Strategic allocation to the north and north-west of Burgess Hill
- DP38 Biodiversity

Pertinent sections of these policies include:

DP7: General Principles for Strategic Development at Burgess Hill (page 39-40)
”Strategic development will:

- Identify and respond to environmental, landscape and ecological constraints and deliver opportunities to enhance local biodiversity and contribute to the delivery of green infrastructure... in accordance with policies... including DP38: Biodiversity;...”

DP9: Strategic allocation to the north and north-west of Burgess Hill (page 43-46)

...The Allocation-wide Phasing Strategy will set out the proposed phasing of the Strategic Allocation Area, including the relevant land uses and infrastructure delivery for each phase:

- Identify and take account of environmental, landscape and ecological constraints including where possible avoiding or minimising harm to sensitive receptors and appropriately responding to the landscape setting including retention of woodland. hedgerows and other important natural features wherever possible and appropriate landscaping and safe design of balancing ponds and water/drainage features; and deliver opportunities and requirements as set out in Policy DP7: ... and DP38: Biodiversity”
 (extract) page 43-46)

DP38: Biodiversity (page 92-93)

“...Biodiversity will be protected and enhanced by ensuring development:

- Contributes and takes opportunities to improve, enhance, manage and restore biodiversity..., 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 ... Ancient Woodland or to other areas identified as being of nature conservation..., including wildlife corridors, aged or veteran trees,...

Specific to the Phase 2 WBLR is the adopted West Sussex Transport Plan 2022 to 2036 (adopted 1 April 2022). Paragraph 4.8 (page 4) states, “...If major improvements are being made to the road network, our approach is to ensure they enhance biodiversity.”

LOCAL

The Northern Arc, Burgess Hill Masterplan3 (2018) Vision incorporates four themes, including:

- “Protecting and enhancing the environment – the Northern Arc will incorporate and protect the existing woodland, open space and river valleys into a connected green infrastructure network. The Masterplan will seek to maintain and create natural habitats and biodiversity corridors with the aims of: achieving an overall net gain in biodiversity across the site; supporting climate change objectives; and enhancing place-making objectives.”

Strategic development principles within the masterplan which were identified to be achieved throughout the NAAS area include:

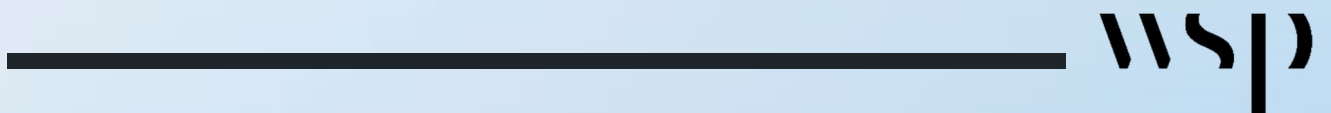
SDP 14 - Landscape and Green Infrastructure (page 33) “The development of the Northern Arc will preserve and enhance the established framework of woodlands, trees and hedgerows...The existing woodland, open space and river valleys will form a connected green infrastructure network. This will maintain existing and create new habitats and

biodiversity corridors,... It will also deliver a net gain in biodiversity. This will be achieved by delivering ecological enhancements within the green infrastructure areas, such as ecologically valuable SuDS systems, private and shared garden and amenity space, and passive measures elsewhere such as green and brown roofs and the creation of new habitats....”

SDP 16 - Ancient Woodland and Veteran Trees (page 34) “The multiple designated Ancient Woodlands within the Northern Arc, which are an irreplaceable habitat, will be retained and protected.... The buffer zone around the Ancient Woodlands will be a minimum of 15 metres.... A small number of veteran trees and potentially veteran trees have been identified... so these can also be retained and protected where possible.”

Appendix C

BNG Good Practice Principles
(CIEEM, IEMA & CIRIA, 2016)



Appendix C – BNG Good Practice Principles (CIEEM, IEMA & CIRIA, 2016)

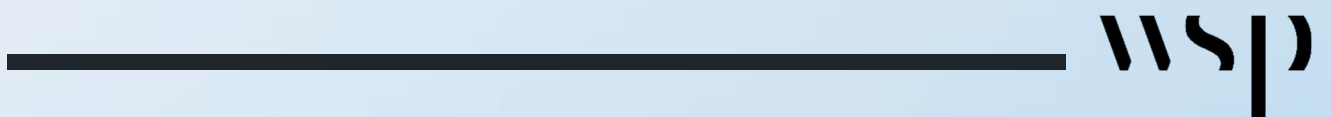
Principle number	Description	Evidence
1.	This metric does not change existing biodiversity protections, statutory obligations, or policy requirements. The use of this metric does not override the ecological mitigation hierarchy and other requirements (such as consenting or licensing processes, for example woodlands).	The proposed route and associated landscape design of Phase 2 WBLR avoids the Ancient Woodlands. The proposal complies with local planning policies DP 7, 9 and 38: all proposed tree planting is native; planting areas have been maximised within the space available with drainage attenuation tanks being sited underground to allow habitat creation and planting at ground level.
2.	This metric should be used in accordance with established good practice guidance and professional codes.	The metric and report have been informed by the guidance available in the Metric 4.0 User Guide and accompanying technical guidance. The report structure is based upon CIEEM template for BNG assessment reports. The authors have carried out the assessment in accordance with the Landscape Institute Professional Code of Practice.
3.	This metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.	The calculation is intended to contribute to the design decision process for the whole Northern Arc Allocation Site.
4.	Biodiversity units are a proxy for biodiversity and should be treated as relative values.	The biodiversity of the existing site is limited due to land use and management practices, being largely agricultural. The replacement grassland habitat is of a higher biodiversity unit value than the existing

Principle number	Description	Evidence
		due to its greater distinctiveness (through improved species diversity).
5.	This metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.	Whilst the assessment of the Phase 2 WBLR site has resulted in negative percentage net gain, the original BNG assessment for the NAAS demonstrated a greater than 10% net gain over the whole scheme. It is assumed that other professionals/experts will view this assessment in the wider context of the whole development site. The results will be used to inform the biodiversity details for adjacent land.
6.	Habitat interventions need to be realistic and deliverable within a relevant project timeframe.	The proposed condition targets are realistic, e.g. moderate condition has been selected for trees due to the time taken to reach maturity, and also for grassland to allow for the influence of recreational activity and anti-social behaviour as the habitat areas will be publicly accessible.
7.	Created and enhanced habitats should seek, where practical and reasonable, to be local to any impact and deliver strategically important outcomes for nature conservation.	The NAAS strategic landscape structure seeks to provide physically linked habitats within a large-scale green infrastructure network. The physical links will contribute to the provision of access corridors for species and seed sources for establishment and further diversification.

Principle number	Description	Evidence
8.	The metric does not enforce a minimum habitat size ratio for compensation of losses. However, proposals should aim to: • maintain habitat extent (supporting more, bigger, better and more joined up ecological networks) and • ensure that proposed or retained habitat parcels are of sufficient size for ecological function.	The NAAS strategic landscape structure seeks to provide physically linked habitats within a large scale green infrastructure network. This will create a robust, joined up ecological network. Habitat parcels are of a sufficient size, e.g. Ancient woodland and their buffer zones, hedgerows and the River Adur valley for long term biodiversity and future sustainability.

Appendix D

Biodiversity Metric & Supplementary
Files



Appendix D – Biodiversity Metric & Supplementary Files

A completed Statutory Biodiversity Metric 4.0 Excel toolkit has been provided alongside this report, please see the following file:

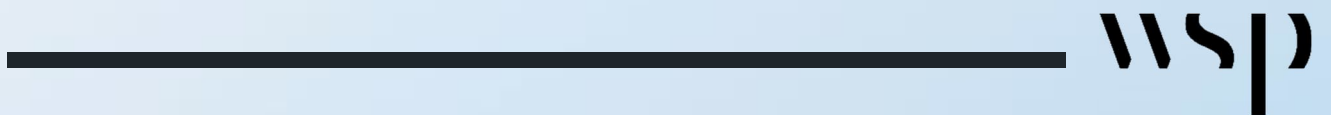
- Biodiversity_Metric_4.0_WBLR-WSP-EXX-00-RP-L-0154-S0-P03

The following supplementary documents/datasets informed the Metric calculation:

- AECOM (December 2018) Northern Arc Allocation Planning Application, Burgess Hill - Environmental Statement Volume I, Chapter 6 Ecology
- AECOM (August 2019) Northern Arc Allocation Planning Application, Burgess Hill - Environmental Statement Addendum Chapter 6 Ecology
- AECOM (undated) Northern Arc Allocation Planning Application, Burgess Hill - Environmental Statement Volume II, Appendix 6-3: Burgess Hill Northern Arc East: Phase 1 Habitat Survey Report - downloaded from the Council website' planning portal
- TEP (May 2020) Burgess Hill Northern Arc (DM/18/5114) Reserved Matters Western Bridge and Link Road – Phase 1 Biodiversity Report Document Ref. 7882.001 (version 2.0) Part 1 of 4 - prepared for Homes England. Sourced on the Mid Sussex District Council's website planning portal
- WSP (January 2023) Preliminary Ecological Appraisal Report Western Bridge Link Road Phase 3, Project No. ED/100377-15. Report No. WBLR-WSP-EXX-RP-L-0127 for Jackson Civil Engineering Group Ltd
- AECOM (November 2020) Northern Arc Allocation: Biodiversity Scheme report, project number 60610817 submitted as supporting documentation for the planning application DM/20/2418
- Ecus Ltd (November 2021) Western Link Bridge Road, Burgess Hill - BS5837:2012 Tree Survey V.1.0 Final Draft. Report Ref. 18043, on behalf of Capita Property & Infrastructure Ltd.
- Ecus Ltd (November 2021) Drawing no. 18043-ARB-01 Western Link Bridge Road, Burgess Hill, Figure 3.1 Tree Survey and Tree Constraints Plan (page 1 of 2)
- Ecus Ltd (November 2021) Drawing no. 18043-ARB-02 Western Link Bridge Road, Burgess Hill, Figure 3.1 Tree Survey and Tree Constraints Plan (page 2 of 2)

Appendix E

Post-development habitat translation



Appendix E – Post-development habitat translation

Data Sources:

- General Arrangement Plan Ref. WBLR-WSP-HPN-04-DR-C-0223

Table E-1 – Translation of post-development habitats

Landscape Classification	Metric habitat type	Metric habitat justification	Target condition	Condition justification
Native shrub planting	H3h: mixed scrub	This habitat will comprise three native scrub species: common hazel, dogwood, and privet, planted at 5 plants per m2, at a whip height of 60-80cm.	Moderate	The limited management is expected to maintain this habitat as scrub.
Wildflower grass	G3c: other neutral grassland	The area of other neutral grassland that adjoins highway verge would be seeded with the client's specification but must contain a mix that would be typical of this type of grassland.	Moderate	The condition will never become good due to the area that it is in receiving constant management, pollution from the cars, disturbance from pedestrians and spray from the road. This being the case the seed mix that will be used will provide the area with a diverse range of wildflowers
Grass reinforcement	G4: modified grassland	The area of modified grassland that adjoins highway verge would be seeded with the client's specification but must contain a mix that would	Poor	The condition will never become good due to the area that it is in receiving constant management, pollution from the cars, disturbance from pedestrians and spray from the road.

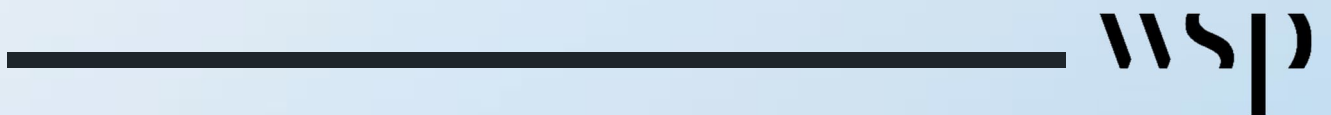
Landscape Classification	Metric habitat type	Metric habitat justification	Target condition	Condition justification
		be typical of this type of grassland.		
Hardscaped granite setts	U1b: sealed surface	A form of hard standing non permeable surface that meets the U1b code.	N/A	N/A
Shared use footway/cycleway bound surface course	U1b: sealed surface	A form of hard standing non permeable surface that meets the U1b code.	N/A	N/A
Carriageway with conservation kerbing	U1b: sealed surface	A form of hard standing non permeable surface that meets the U1b code.	N/A	N/A
Grasscrete	G4/U1b: modified grassland / sealed surface	Parcels in this habitat have been made into a 50/50 mix of G4 and U1B to account for the value of grassland will have, but in the context of its location in a concrete sealed surface matrix.	Poor	G4 and U1b will never reach a score above poor due to the combination with grass and sealed surface.
Segregated cycle track finished in green surfacing	U1b: sealed surface	A form of hard standing non permeable surface that meets the U1b code.	N/A	N/A



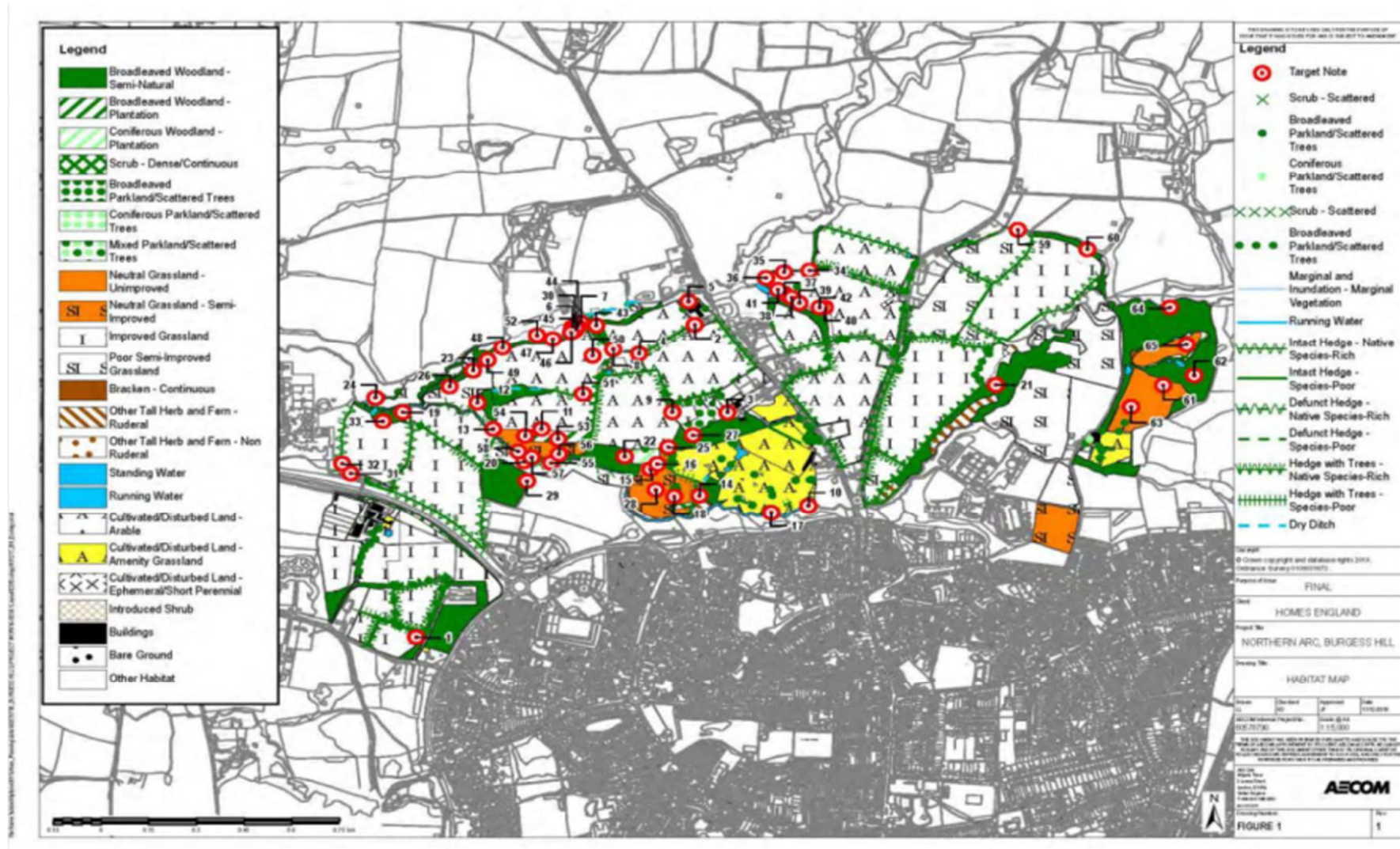
Landscape Classification	Metric habitat type	Metric habitat justification	Target condition	Condition justification
Segregated footway bound surface course	U1b	A form of hard standing non permeable surface that meets the U1b code.	N/A	N/A

Appendix F

Phase 1 Habitat Survey Map



Appendix F – Phase 1 Habitat Survey Map (ACEOM, 2018)





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