

Site:	Newland Road Bognor Regis
Client:	Gleave
Job Number:	784-B075926
Date of Report:	03/09/2025

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Planning Statement: De Minimis Exemption for Biodiversity Net Gain

This statement confirms that the proposed development on the site at Newlands Road, Bognor Regis PO22 9FJ, UK qualifies for the de minimis exemption under Biodiversity Net Gain (BNG) regulations, as outlined by the Department for Environment, Food and Rural Affairs¹. The site is centred at Ordnance Survey National Grid Reference SU 94432 01789 (**Figure 1: Site Location Plan**).

Proposals:

Site alterations include the removal of a pillar from canopy, the installation of a new smoking shelter, and the installation of a new waste platform. The application boundary is shown in **Figure 1: Site Location Plan**. Photographs of the site can be found in **Appendix A**.

¹ Department for Environment, Food and Rural Affairs (DEFRA) (2024) Biodiversity Net Gain: Statutory Guidance on Exemptions. Available at: gov.uk (Accessed: 21/08/2025).

Methodology:

A high-level UK Habitat Classification Survey was undertaken on the site on the 27th of August 2025 by Tetra Tech Senior Ecologist James Gretton, BSc (Hons) QCIEEM. This was followed by a review of the proposals (25071-ASA-00-EX.SI-D-ARC-0006 (S0-P02)²), photographs, and aerial imagery.

Information in this letter regards BNG only and does not constitute an extended ecology survey or comprehensive survey for invasive species. Given the small scale of the proposals and habitats present, this is not considered to represent a constraint to the findings of this letter.

Our Ecologists follow CIEEM's Code of Professional Conduct³, with all surveys completed in accordance with Tetra Tech's Biosecurity Policy⁴.

Eligibility and Application of the De Minimis Exemption:

The refurbishments are proposed to take place in an existing warehouse and car park area, which has been classified as developed land with a sealed surface (**Figure 2: Existing Habitat Plan**). The refurbishment area has a biodiversity value of zero under the statutory biodiversity metric.

The application boundary is dominated by developed land (sealed surface and buildings) (**Appendix A, Photographs 1, 2, and 3**). An area of modified grassland with a small whitebeam tree *Sorbus aria* present at the northern boundary of the proposal area (**Appendix A, Photographs 4 and 5**) will be retained and protected (further details can be found in the Habitat Units section of this report).

No linear features or watercourses were identified on or near the site; therefore, these elements are not considered further in this BNG assessment.

Habitat Units:

Based on proposals (25071-ASA-00-EX.SI-D-ARC-0006 (S0-P02)) no natural habitats will be lost to the development.

² Ashton Smith Associates Ltd (2025). 25071-ASA-00-EX.SI-D-ARC-0006 (S0-P02).

³ Chartered Institute of Ecology and Environmental Management (2022) Code of Professional Conduct. CIEEM.

⁴ Tetra Tech (2023) Biosecurity Policy.

The client has also confirmed that the small area of modified grassland, the whitebeam tree within the red line boundary, and all other habitats outside of the application boundary within the wider site (**Appendix A, Photograph 6**) will remain unimpacted and protected through fencing with exclusion signage (if required) during the proposed works.

Assessment of Biodiversity Impact:

Based on the survey of the redline boundary in the Site Location Plan, the proposal is considered to meet the exemption due to the following:

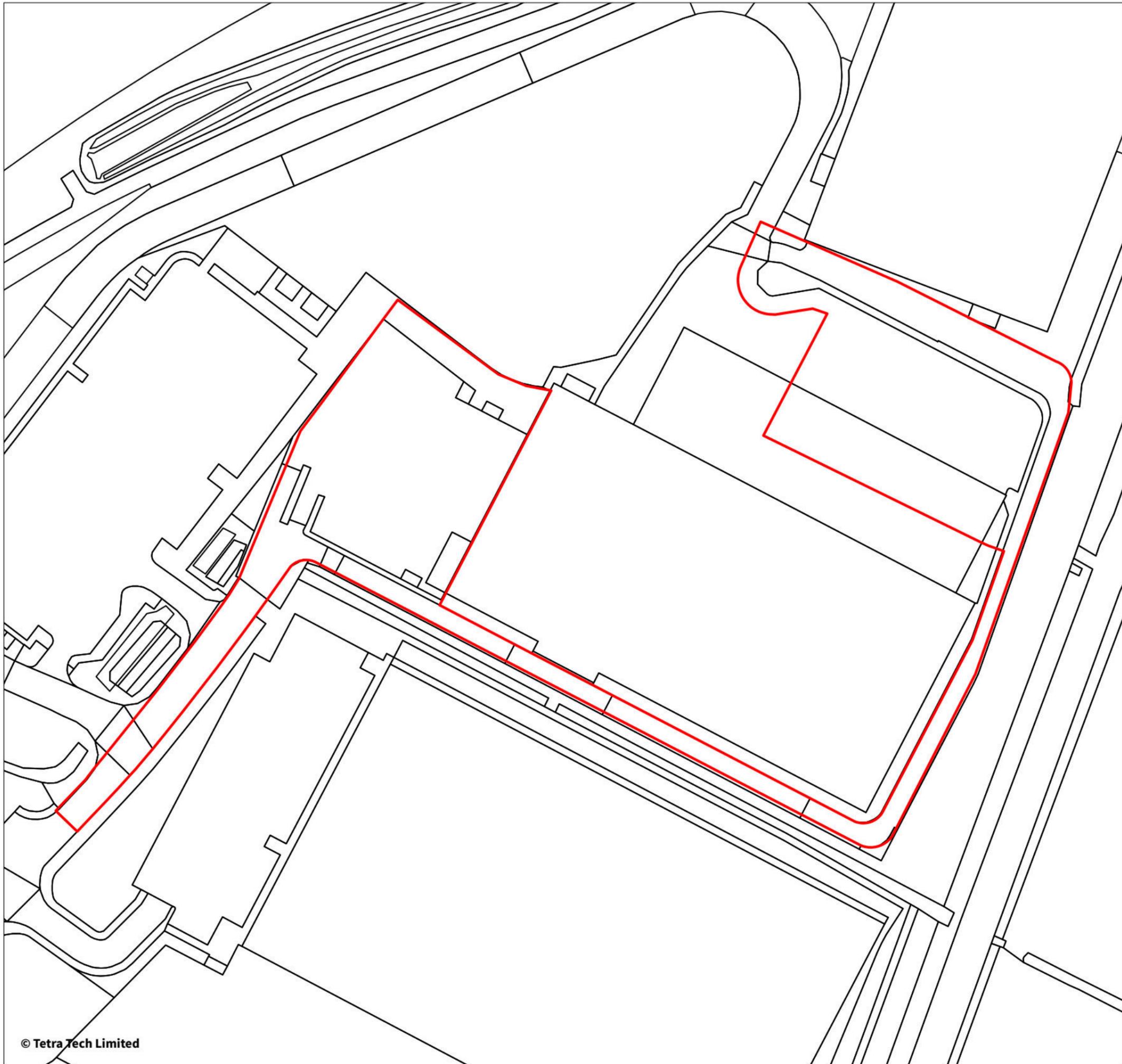
- The biodiversity impact falls below the de minimis threshold of <math><25\text{m}^2</math> of non-priority habitat lost;
- No priority habitat is affected within the red line boundary;
- On-site habitats (Figure 1: Existing Habitat) will be protected during works and adequately fenced off. Further details will be provided as a Construction Zone Exclusion Plan to contractors.

As a result of the factors listed above, the **development falls within the de minimis exemption and does not require a Biodiversity Gain Plan** for habitat, hedgerow, or watercourse units.

Conclusion:

Since the proposal **meets the de minimis exemption criteria**, biodiversity net gain requirements do not apply. It is requested as part of this pre-application planning process that the Local Authority confirm that this approach is acceptable.

Figure 1: Site Location Plan



Existing Site Layout Plan

Newlands Road, Bognor Regis



Gleave

Legend

 Site boundary

Notes:

Drawn by: CHRIS.DAWE
Checked by: George Siskos

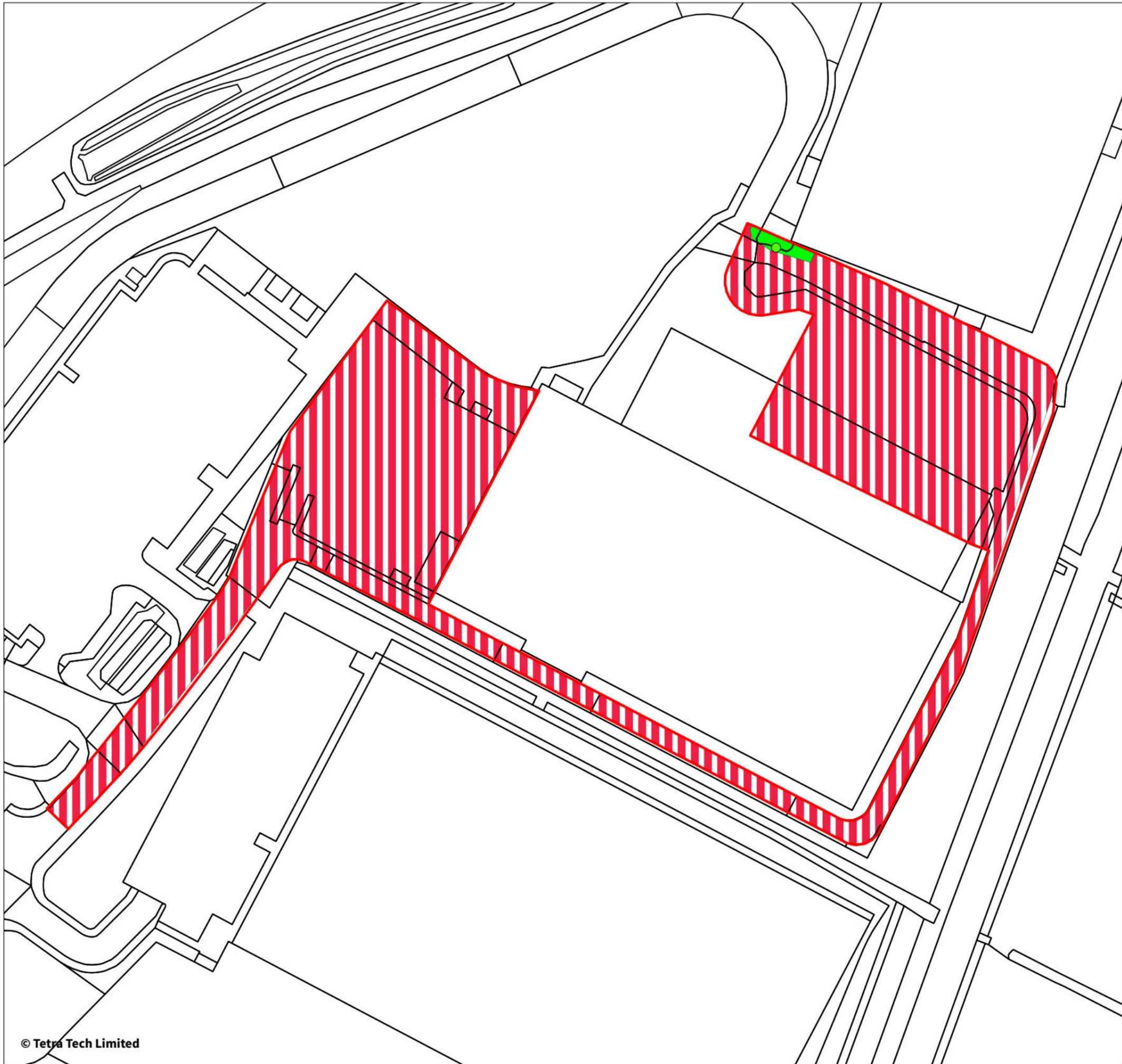
Figure No. 1
Revision No. A
02 September 2025

0 10 20 30 40 Meters
Scale 1:994 @A3

British National Grid
NGR: 494510E 101791N

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Figure 2: Existing Habitat Plan



Existing Habitat Plan

Newlands Road, Bognor Regis



Gleave

Legend

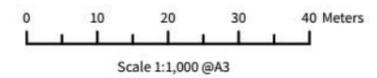
- Application boundary
- g4 - Modified grassland
- u1b - Developed land, sealed surface
- Urban tree

Symbology defined by UK Habs. <https://ukhab.org/ukhab-documentation/>

Notes:

Drawn by: CHRIS.DAWE
 Checked by: George Siskos

Figure No. 2
 Revision No. A
 02 September 2025



British National Grid
 NGR: 494513E 101790N

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Appendix A: Site Photographs



Photograph 1: Western aspect of building loading area, classed as u1b developed land, sealed surface.



Photograph 2: Developed land; sealed surface road that runs east along the southern boundary of the site, then north to a car park.



Photograph 3: Developed land, sealed surface car park located within the northeastern area of the site.



Photograph 4: A small area of modified grassland with three small whitebeam trees, which is partially located within the site's application boundary.



Photograph 5: A closeup of the whitebeam tree within the application boundary located on the northern edge of the site.



Photograph 6: A fenced off wetland/grassland habitat northwest of the site's application boundary.