

Premier Inn, Old Waitrose Site, Littlehampton

Cumming Group

Biodiversity Net Gain Report

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V2	Cameron Mason		29/04/2025

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1. Introduction

1.1. Background & Proposals

- 1.1.1. Ecology Solutions was commissioned by Cumming Group in February 2025 to provide a Biodiversity Net Gain report for the Old Waitrose Site, Littlehampton (see Plan ECO1), hereafter, referred to as the site.
- 1.1.2. The proposed development for the site comprises of the construction of a Premier Inn with associated access, parking and landscaping.

1.2. Application Site Characteristics

- 1.2.1. The site is approximately 0.56 ha in size and currently contains the Old Waitrose retail unit and car parking comprising mostly of hardstanding, with a small area of raised planter with ornamental planting.
- 1.2.2. The site is located to the centre of Littlehampton on Avon Road. The wider area contains predominantly retail units and residential dwellings typical of a town centre.

1.3. Biodiversity Net Gain Report

This document assesses the level of Biodiversity Net Gain within the site. This report has been prepared with due consideration to the guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM)¹² in relation to Biodiversity Net Gain. This assessment has been based around the results of the habitat survey undertaken in February 2025 for the development site.

¹ CIEEM (2019). *Biodiversity Net Gain. Good Practice Principles for Development, A Practical Guide.*

² CIEEM, CIRIA, IEMA (2016). *Biodiversity Net Gain: Good Practice Principles for Development.*

2. Statutory Biodiversity Metric

2.1. The Statutory Biodiversity Metric was released on 29th November 2023 and was updated on 12th February 2024. It uses habitat features as a proxy measure for capturing the value and importance of nature and uses calculations to assess the importance of each habitat based on its size, ecological condition and strategic location.

2.2. Methodology

On-site Methodology

- 2.2.1. The proposed development site was surveyed in September 2023 based on UK Habitat survey (UKHab) methodology, as recommended by Natural England, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. This technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey. Any such areas identified can then be examined in more detail.
- 2.2.2. Measurements for on-site habitats pre-development were calculated using Natural England's QGIS Net Gain Habitat Mapping template and QGIS Import Tool. Information regarding the habitats present, as well as their condition, were based on survey information obtained in September 2023 by Ecology Solutions (see report: InterimEcoAss.v2). The Biodiversity Metric User Guide³, as well as professional judgement, was used to inform the habitats condition criteria.
- 2.2.3. Measurements for post-development on-site habitats are based on the Planting Masterplan (drawing ref. 1274-MP-01) by Indigo Landscape Architects Limited.

³ Natural England (2024). *The Statutory Biodiversity Metric, User Guide*, Department for Environmental, Food and Rural Affairs

3. Results and Discussion of Metric

3.1. This section should be read in conjunction with the Natural England Biodiversity Metric calculation tool and Ecology Solutions' Ecological Assessment, both of which have been provided separately.

3.2. On-site Baseline Habitat (Pre-Development)

3.2.1. The site was subject to a UKHab survey in February 2025.

3.2.2. The following main habitat / vegetation types were identified within the site during the surveys undertaken:

- Developed land sealed surface (including the building footprint)
- Ground level planter with ornamental planting and two individual trees

3.2.3. The location of these habitats, which are photographed and described in detail within the existing Ecological Assessment (report ref: InterimEcoAss.v2; dated April 2025), is shown on Plan ECO2.

3.2.4. Table 3.1 below summarises the habitats present on site. A baseline total of habitat units are present pre-development.

3.2.5. Habitats were classified based on their conformity to UK habitat classifications⁴ and condition assessments were completed for each habitat identified within the site. The Biodiversity Technical Supplement⁵ as well as professional judgment was used to inform the habitats' condition criteria.

⁴ Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2020). *UK Habitat Classification – Habitat Definitions V1.1* at <http://ukhab.org>.

⁵ Department for Environment, Food and Rural Affairs (2024). *The Statutory Biodiversity Metric: User Guide*, Department for Environment, Food and Rural Affairs. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

Table 3.1. Summary of on-site baseline habitats and hedgerows

Baseline habitat	Baseline Biodiversity Units	Condition Criteria / Pass or Fail / Indicator Score	Condition	Ecological Features and Condition Notes	After Works
Ground level planter	0.01	No Assessment Required	N/A	<p>Within the ground level planter there are a number of shrubs associated with the planter.</p> <p>Species recorded in the planting bed consist of: Himalayan birch <i>Betula utilis</i> var. <i>jacquemontii</i>, red robin <i>Photinia</i> sp, Ivy <i>Hedera helix</i>, climbing hydrangea <i>hydrangea anomala</i> spp, <i>petolaris</i>, Buddleia <i>Buddleia davidii</i> and Cherry <i>Prunus</i> sp.</p>	0.01 units retained
Developed Land; Sealed Surface	0	No Assessment Required	N/A	The area of hardstanding dominates the site which includes the former retail unit and associated car parking.	N/A

Individual Trees	0.0204	Urban tree			Moderate 3/6 condition criteria passed = moderate	Two native trees within the large planter on the western boundary	0.0204 units retained
		Criteria	Tree 1	Tree 2			
		The tree is a native species (or at least 70% within the block are native species).	Yes	Yes			
		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).	Yes	Yes			
		The tree is mature (or more than 50% within the block are mature) ¹ .	No	No			
		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.	No	No			
		Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No	No			
		More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Yes			

3.3. On-site Post-Development

- 3.3.1. Table 3.2 below summarises the habitats that are to be created and enhanced on-site post-development and are illustrated on Plan ECO3 and also found on Planting Masterplan (drawing ref. 1274-MP-01) by Indigo Landscape Architects Limited.
- 3.3.2. The landscape strategy includes a variety of native tree and shrub planting. Focus has been had towards the retention and enhancement of the ground level planter of greatest diversity along the western boundary of the site.
- 3.3.3. While retention and enhancement of the habitats considered to be of greatest value has been sought, the proposed scheme would result in a net gain of 0.17 habitat units. This results in gains of 95.91% in habitat units from pre- to post-development.
- 3.3.4. The targeted conditions for proposed habitats will be achieved through appropriate management undertaken during the operational phase of the proposals. This will ensure that the proposed habitats continue to offer biodiversity benefits in the future. It would be expected that a condition be applied to the planning permission detailing the prescribed planting, management and monitoring to be undertaken to ensure the aspirations set out are delivered.

Table 3.2. Summary of post-development habitats and hedgerow types that will be created.

Created Habitats				
Proposed Habitat	Landscape Plan Habitat	Target Condition	Biodiversity Units Delivered	Target Condition Notes
Introduced Shrub	Proposed planting	Condition Assessment N/A	0.05	New areas of introduced shrub will be established across the site and will be subjected to regular management practices.
Developed Land; Sealed Surface	N/A	N/A	0	This area includes the proposed buildings, associated hardstanding and infrastructure through the site. No condition is applicable.
Individual trees - Urban Tree	Trees (feature), trees (12-20cm girth),	Poor	0.11	A total of 10 trees will be planted within the site, which have been classed as small and will be managed to achieve 'Poor' condition.

4. Evaluation

4.1. The Principals of Evaluation

Biodiversity Net Gain – Good Practice for Development

- 4.1.1. CIRIA, CIEEM and IEMA have developed principles of good practice to achieve Biodiversity Net Gain. These principles provide a framework that helps improve the UK's biodiversity by contributing towards strategic priorities to conserve and enhance nature through sustainable development. There are ten principles in total, and all principles must be applied together as one approach. The ten principles are set out below.
- 4.1.2. **Principle 1. Apply Mitigation Hierarchy.** Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision makers where possible, compensate for losses that cannot be avoided. If compensation for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
- 4.1.3. **Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere.** Avoid impacts on irreplaceable biodiversity; these impacts cannot be offset to achieve no net loss or net gain.
- 4.1.4. **Principle 3. Be inclusive and equitable.** Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to net gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.
- 4.1.5. **Principle 4. Address risks.** Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.
- 4.1.6. **Principle 5. Make a measurable net gain contribution.** Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
- 4.1.7. **Principle 6. Achieve the best outcomes for biodiversity.** Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when:
- Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses.
 - Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation.
 - Achieving net gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels.
 - Enhancing existing or creating new habitat.

- Enhancing ecological connectivity by creating more bigger, better and joined areas for biodiversity.
- 4.1.8. **Principle 7. Be additional.** Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).
- 4.1.9. **Principle 8. Create a net gain legacy.** Ensure net gain generates long-term benefits by:
- Engaging stakeholders and jointly agreeing practical solutions that secure net gain in perpetuity.
 - Planning for adaptive management and securing dedicated funding for long-term management.
 - Designing net gain for biodiversity to be resilient to external factors, especially climate change.
 - Mitigating risks from other land uses.
 - Avoiding displacing harmful activities from one location to another.
 - Supporting local-level management of net gain activities.
- 4.1.10. **Principle 9. Optimise sustainability.** Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
- 4.1.11. **Principle 10. Be transparent.** Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

Lawton's Principle

- 4.1.12. Principles for enhancing England's wildlife sites were developed as part of the Lawton Review⁶. Across the UK, these principles can be used to design Biodiversity Net Gain activities to boost wildlife sites. They are:
- Improving the quality of wildlife sites;
 - Increasing the size of the wildlife sites;
 - Enhancing connections between, or joining up wildlife sites;
 - Creating new wildlife sites; and
 - Reducing pressure on wildlife sites.

4.2. Post-Development Evaluation

- 4.2.1. The site's contribution to Biodiversity Net Gain has been assessed with due regard to the principles outlined and discussed above.

⁶ Department for Environment, Food and Rural Affairs (2010). *Making Space for Nature: A Review of England's Wildlife Sites*, DEFRA.

On-Site

- 4.2.2. The on-site landscape strategy includes a variety of habitats and will comprise of tree planting, non-native and native ornamental planting in ground level planters.
- 4.2.3. The development of the site will result in the gain of 0.17 habitat units resulting in the percentage change of 95.91%.
- 4.2.4. Further enhancements are being provided as part of the on-site development that are not considered as part of the Natural England metric, such as the provision of bird boxes and enhancement of the existing ground level planter along the western boundary.

Table 4.1. Summary of Natural England's Biodiversity Metric Results

On-site Baseline	Habitat Units	0.09
On-Site post-intervention	Habitat Units	0.17
Total net Percentage gain	Habitat Units	95.91%

5. Summary and Conclusions

- 5.1. Ecology Solutions was commissioned by Cumming Group in February 2025 to provide a Biodiversity Net Gain report for the Old Waitrose Site, Littlehampton.
- 5.2. The proposed development for the site comprises the construction of several commercial units, with associated access and landscaping. A Landscaping plan is shown in Appendix 1.
- 5.3. The Statutory Biodiversity Metric was used to calculate the pre-development baseline units. A total of 0.09 on-site baseline habitat units are present on-site pre-development. The proposed development will achieve an on-site net gain of 95.91% in habitat units.
- 5.4. The landscape strategy includes a variety of habitats and will comprise of tree planting and native and non-native shrub planting.
- 5.5. Additional provisions can be incorporated into the scheme that are not considered by Natural England's metric including the installation of bird boxes and the enhancement of the existing ground level planter.
- 5.6. Overall, considering the on-site provisions, it is considered that the development will achieve the minimum 10% net gain in biodiversity as set out in the Environment Act and would adhere with adopted national and local planning policy and legislation.

PLANS

PLAN ECO 1

Site Location and
Ecological Designations



KEY:

— Site Boundary

Ecological Sites

▭ Sites of Special Scientific Interest

▨ Local Nature Reserves

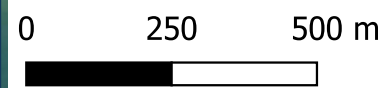
▭ Local Wildlife Sites



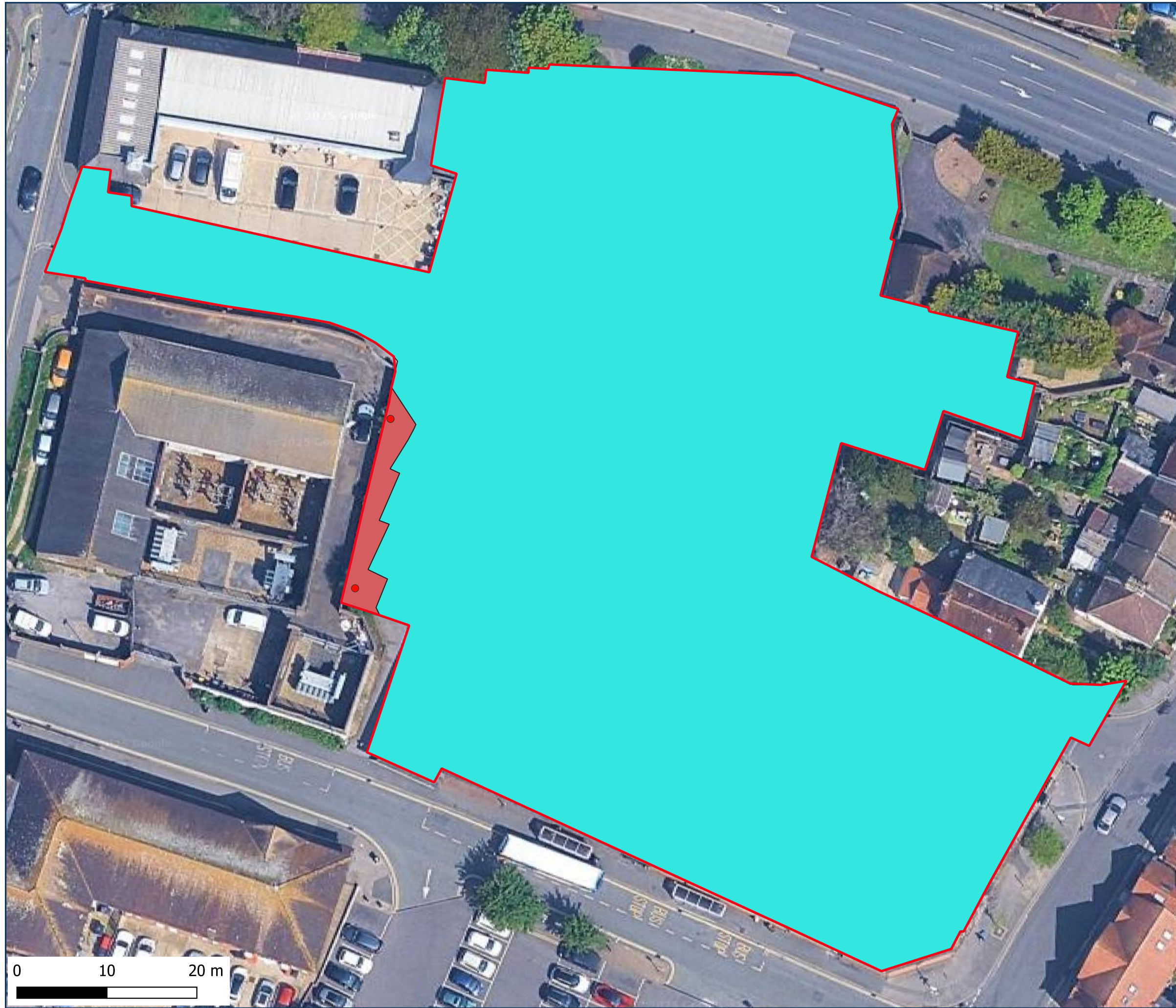
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12674: Old Waitrose Site, Littlehampton





ECO 1: Site Location and Ecological Designations Rev: A
April 2025



PLAN ECO 2
Baseline Habitats



KEY:

-  Site Boundary
- Baseline Area Habitats
 -  Developed Sealed Surface
 -  Ground Level Planter
 -  Existing Individual Trees (Small)

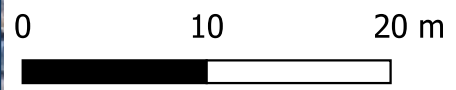


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ECO 2: BNG Baseline Habitats

Rev: A
April 2025

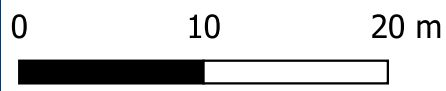


PLAN ECO 3
Post-Development
Habitats



KEY:

-  Site Boundary
-  Post Development Habitat Area
-  Developed Sealed Surface
-  Ground Level Planter
-  Introduced Shrub
-  Proposed Individual Trees



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





ECO 3: BNG Post Development Habitats	Rev: A April 2025
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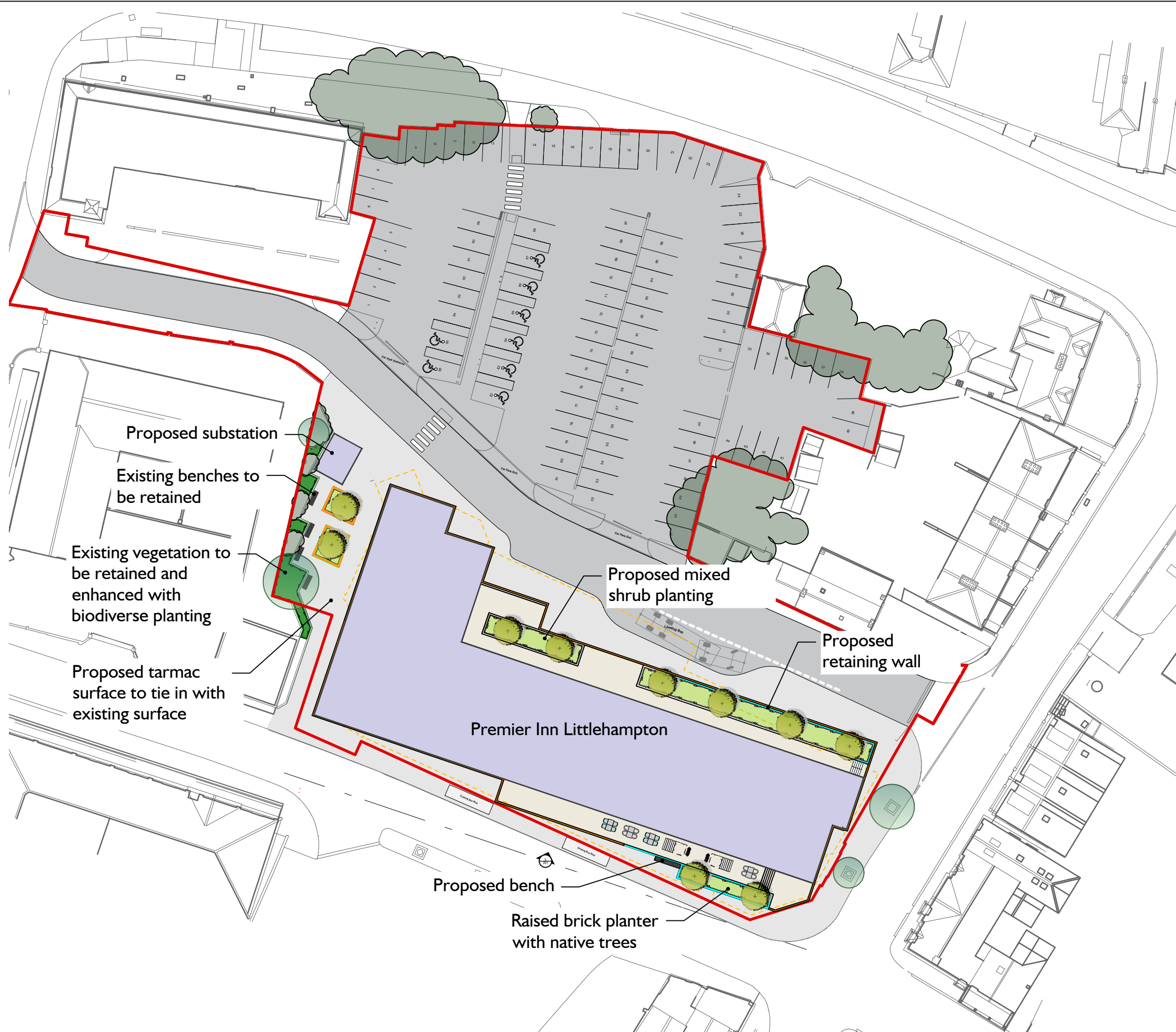
Appendices

Appendix 1

Landscape Masterplan

KEY

-  Existing tree to be retained
-  Other existing vegetation retained
-  Proposed building building
-  Existing car park and road
-  Proposed tarmac surface
-  Proposed paved surface
-  Proposed block banding
-  Proposed native tree
-  Proposed mixed shrub planting
-  Proposed enhancement to existing planting
-  Proposed walls



Proposed substation

Existing benches to be retained

Existing vegetation to be retained and enhanced with biodiverse planting

Proposed tarmac surface to tie in with existing surface

Proposed mixed shrub planting



Proposed retaining wall

Premier Inn Littlehampton

Proposed bench

Raised brick planter with native trees

SCALE 1:500 @ A3 NORTH

rev	description	date	by	chk
-	First issue	2025-04-08	ES	ES

project
PI LITTLEHAMPTON AVON ROAD

client
WHITBREAD GROUP PLC

drawing title
MASTERPLAN

drawing number	revision	status	scale
1274-MP-01	-	PLANNING	1:500@A3

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