FPCR | environment & design




Biodiversity Net Gain Report

Client

Hallway Properties Ltd

Project

Land at Norway Lane,

Littlehampton

Date

October 2025

CONTENTS

FIGURES

APPENDICES

Rev	Issue Status	Prepared/Date	Approved/Date
-	Final	CHK / 14.04.2025	DAH / 17.04.25
A	Final	OMS / 09.05.25	N/A Minor Amendments
B	Final	CHK / 14.05.2025	HOH / 15.05.2025
C	Final	REM / 24.10.25	DAH / 24.10.25

1.0 NON-TECHNICAL SUMMARY

Report Scope and Methodology
FPCR were commissioned by Hallway Properties Ltd to undertake a Biodiversity Net Gain Assessment of Land at Norway Lane, Littlehampton. The proposals for the Site include the conversion and sub-division of two warehouse units (Unit 5 & Unit 6) and the demolition of an office building (Unit 7) to provide additional parking. New areas of hardstanding and landscape planting associated with the new structures are also proposed to provide vehicular and pedestrian access.
Habitat Baseline
The Site is dominated by habitats of low ecological value including built environments and introduced shrub, and amenity grassland.
Habitat Proposals
The proposals include the retention of the majority of the amenity grasslands, ornamental shrubs and trees within the south of the Site, as well as the retention of the ponds. Small patches of amenity grassland between parking spaces, mixed scrub and introduced shrub will be lost by the proposals. 61 individual trees will be lost by the proposals. The proposals include the creation of additional areas amenity grassland, native mixed scrub, introduced shrub, and the planting of 57 individual trees.
Conclusion
The proposals will lead to a Biodiversity net loss of 2.02 habitat units, mainly due to the loss of individual trees. Proposed on-site tree planting will not be able to compensate for the losses of the trees completely. The proposals fail the trading rules for the loss of scrub and individual trees. Offsite units will be sought to compensate for the deficit. The delivery of off-site habitat units will be secured through the mandatory Biodiversity Net Gain condition imposed by the Environment Act 2021. Details of the off-site provision will be supplied as part of a Biodiversity Gain Plan which is to be submitted following receipt of planning permission in accordance with the Environment Act 2021 requirements.

2.0 INTRODUCTION

2.1 The following report has been prepared by FPCR Environment and Design Ltd on behalf of Hallway Properties Ltd for the development proposals at Land at Norway Lane, Littlehampton (OS Grid Ref: TQ 03805 03458) herein referred to as 'the Site'.

2.2 This Biodiversity Net Gain Report is based on the Chartered Institute of Ecology and Environmental Management (CIEEM) guidance. The scope and objectives of this report are to:

- Summarise the results of the baseline UKHab Survey undertaken on the Site and to present the results of habitat condition assessment surveys following the Defra Statutory Biodiversity Metric Technical Guidance.
- Provide an overview of the proposed habitats following completion of the scheme.
- Present the results of the Statutory Biodiversity Metric assessment completed for the proposals.
- Assess the feasibility of the proposals to demonstrate a net gain in biodiversity through the Statutory biodiversity Metric.
- Recommendations for the proposals to maximise their biodiversity potential.

2.3 The assessment is based on the Green Infrastructure Strategy by FPCR Environment and Design Ltd (drawing ref: 12641-FPCR-ZZ-ZZ-DR-L-0001 rev P10).

2.4 This report has been updated to reflect amendments which have been made to the layout and landscaping proposals for the Site in response to comments from consultees from West Sussex County Council Highway's Department and Arun District Council Drainage Consultants. As a result, the proposed footpaths in the south of the Site have been realigned, and further detail has been added to the proposed trees within the landscape plans to show locations of root barriers and root treatments,

2.5 This report accompanies an Ecological Appraisal for the Site which was undertaken to inform the development proposals and to provide recommendations for mitigation and enhancement. This report should therefore be read in conjunction with this Ecological Appraisal (FPCR, May 2025).

Site Context

2.6 The Site comprises a business park with three industrial units (Unit 5, Unit 6 & Unit 7) and associated parking, along with two ornamental ponds and landscaped planting which is dominated by ornamental shrubs. Also present are areas of hardstanding roads and pavements.

2.7 The Site is situated to the north-east of Littlehampton, the surrounding habitat is dominated by urban environments including residential housing to the south, east and west. In addition to a school and church with associated cemetery to the south and a new housing development to the north. There is also a large industrial unit directly to the north of the Site. Greenspace is limited, with larger extents of more semi-natural environments present including a golf course to the north of the Site.

Site Proposals

The proposals for the Site include the part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 and construction of retail (food and non-food), leisure and food & beverage units (Use Class E), together with associated car parking, access, loading areas, landscaping and associated works. Unit 7 i.e. the former office building, is being demolished to facilitate the proposed development and as a first enabling phase. The demolition of Unit 7 forms part of an earlier Prior Notification of demolition application (ref. LU/27/25/DEM).

3.0 LEGISLATION

The Environment Act 2021

3.1 In England, biodiversity net gain is now required under statutory frameworks introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under this framework, every grant of planning permission will be deemed to have been granted subject to a general biodiversity gain condition. This will require an objective for developments to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of all on-site habitats.

3.2 This is a pre-commencement condition requiring the provision of a Biodiversity Gain Plan to be submitted and approved before works can be commenced, but after planning permission has been granted.

3.3 In principle, the grant of planning permission is not within the scope of BNG, however it is important to consider as part of the consenting body's decision-making process how a scheme will be able to demonstrate BNG after permission is granted. Therefore, this biodiversity net gain report presents the results of a Biodiversity Net Gain assessment that has been completed in order to demonstrate how the proposals can be compliant with the requirements of the Environment Act.

Biodiversity Net Gain Hierarchy

3.4 The statutory framework allows for the 10% biodiversity gain to be delivered through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits. However, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, development must consider the biodiversity net gain hierarchy when designing scheme proposals. This sets out hierarchy of actions as follows:

a) First, for all medium, high and very high distinctiveness habitats, the avoidance of any adverse effects.

b) Where these can't be avoided, mitigating any adverse effects on medium, high and very high distinctiveness habitats.

c) Then, for all on-site habitats (including low distinctiveness), adverse effects should be compensated by in accordance with the following hierarchy:

- Prioritising the enhancement of existing habitats; then
- Creation of on-site habitats;
- Allocation of registered off-site unit gains; then
- Purchase of biodiversity credits

3.5 Proposals must demonstrate how the biodiversity hierarchy has been applied to or provide the reasons for any deviation. This biodiversity net gain hierarchy is distinct from the mitigation hierarchy set out in paragraph 187 (d) of the National Planning Policy Framework (2024) which is addressed in the accompanying Ecological Impact Assessment where relevant.

Exemptions

3.6 There are a number of circumstances where a Site will be exempt from biodiversity net gain including:

- Development impacting habitat of an area below a 'de minimis' threshold of 25m^2, or 5m for linear habitats.
- Householder applications (as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015).
- Self-build and custom-build applications (no more than 9 dwellings, site no larger than 0.5 ha and consists exclusively of self-build/ custom dwellings).
- Biodiversity gain sites (where habitats are being enhanced for wildlife only).
- Previously developed land with a baseline score of zero (exempted via the metric).

3.7 The proposals for the Site do not fall under any of the above criteria and this report has therefore been prepared to aid Arun District Council in their decision-making process.

National Planning Policy Framework (2024)

3.8 The NPPF (2024) in particular seeks to ensure that the planning system contributes to and enhances the natural and local environment, protect and enhance biodiversity and geodiversity by:

"187. 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;

192. 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."

Mandatory Biodiversity Net Gain Minimum Reporting Requirements

3.9 The BNG PPG sets out the minimum requirements of any planning application subject to mandatory BNG to present as part of any submission in order to validate the application. For ease of reference, the minimum information required has been set out in *Table 1* below.

3.10 Additional detail and information appropriate to the application is provided within this report in order to assist Arun District Council in their decision-making process and to provide confidence that the scheme will be able to demonstrate a mandatory BNG through the provision of a Biodiversity Gain Plan following receipt of planning permission, in accordance with the PPG.

Table 1: Checklist of Minimum BNG Reporting Requirements for Planning Application Validation

Minimum Requirements in BNG PPG	Statement of Relevance to the Site
Confirmation that the Site is believed to be subject to the mandatory BNG condition.	The Site does not meet any of the exemption criteria and so it is understood that the site will be subject to the mandatory BNG condition.
The pre-development biodiversity value of the Site, either on the data of application or an earlier proposed date (as appropriate).	The accompanying Statutory Metric completed for the scheme provides the pre-development biodiversity value of the Site. The values are also presented within this report.
Where an earlier date is proposed, provide the reasons for proposing that date.	The 'relevant date' is proposed to be the latest date that a Site survey was completed during which observations were made to check if any significant changes in habitats had occurred. For the Site, this will be 19th September 2024. This is considered to be an appropriate date as it is within the data that ecological data is considered valid (two years, as recommended by CIEEM).
The completed metric calculation showing the calculations of the pre-development biodiversity value of the on-site habitat on the data of application (or proposed earlier date) including the publication date of the biodiversity metric used.	The Statutory Biodiversity Metric, published on 7 July 2024, was used to calculate the pre-development value of the Site. The completed metric has been provided alongside this BNG report.
A statement whether activities have been carried out prior to the date of application (or proposed date), that result in loss of on-site biodiversity value (degradation).	This statement confirms that FPCR and Hallway Properties Limited are not aware of any habitat degradation on-site.
A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity gain Requirements (Irreplaceable Habitat) Regulations 2024) on the Site, that exists on the date of application (or an earlier proposed date)	This statement confirms that no irreplaceable habitat has been identified on-site.
Plan(s), drawn to an identified scale and showing the direction of North, showing on-site habitat existing on the date of application (or earlier proposed date) including any irreplaceable habitat (if applicable).	*Figure 1* shows the baseline habitats present on-site on the proposed relevant date (19th September 2024). This includes the minimum requirement to show an identified scale and north arrow.

4.0 METHODOLOGY

Baseline Habitat Assessment

4.1 The Site was subject to a field survey by FPCR on 12th June 2024 using a methodology broadly based on UK Habitat Classification System (UKHab) and the Defra Biodiversity Net Gain Statutory Metric User Guidance. This involved a systematic walk over of the Site to classify the broad habitat types and identify any Habitats of Principal Importance (HPI) for the conservation of biodiversity as listed within Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act 2006. Habitats were broadly mapped in the field using a detailed topography map produced for the scheme using pens or pencils as appropriate.

4.2 Habitat condition assessment surveys were also completed in accordance with the Statutory Biodiversity Metric Habitat Condition Assessments.

Biodiversity Net Gain Calculation

4.3 Defra's Statutory Biodiversity Metric calculation tool was used to inform this BNG Report. It is an MS Excel spreadsheet that is used to quantify the predicted net-change in biodiversity value ("biodiversity units") of a proposed development site before and after development. It treats the area-based habitats and linear features such as hedgerows and lines of trees separately, and is based on pre-determined values, along with published written guidance set by a Natural England-led team of experts.

4.4 The development Site was surveyed and mapped, as described above. The survey results were digitised using QGIS, with the existing habitats identified and areas automatically generated.

4.5 On-Site post-development habitats were determined from the Green Infrastructure Strategy by FPCR Environment and Design Ltd (drawing ref: 12641-FPCR-ZZ-ZZ-DR-L-0001 issue P10), with proposed habitats mapped and digitised using QGIS to generate areas.

4.6 These pre- and post-enhancement habitat areas were then inputted into the Statutory Biodiversity Metric Calculation tool. The metric automatically assigns habitat distinctiveness score for each of the baseline and proposed habitats.

4.7 The metric then assigns a range of pre-assigned factors to each of the proposed habitats. These have been advised by subject knowledge experts and are universal multipliers generated by the metric itself for the following variables relevant to habitat creation, enhancement or restoration proposals:

- difficulty of creating or restoring/enhancing a habitat: This pre-assigned score is based on how difficult a particular habitat type is to create or restore/enhance
- temporal risk: this is the 'time to target condition' for any particular habitat and determines how long a particular habitat type is likely to take to reach the condition score that the desired condition score assigned to it.
- spatial risk: this score is based on the distance between the site of habitat loss and any habitats creation or enhancement proposals at any off-site offsetting solutions.

4.8 The strategic significance multiplier within the metric has been informed by a desk study review. Full details of the desktop study undertaken are provide in the accompanying Ecological Impact Assessment.

4.9 Full details of the calculation methodology are provided in The Statutory Biodiversity Metric User Guide.

5.0 BASELINE CONDITIONS

Strategic Significance

5.1 There were no non-statutory designated sites located within 1km of the Site, no nationally designated sites within 2km of the Site, and the closest statutory designated sites was located 6.2km south-west of the Site (Solent and Dorset Marine SPA).

5.2 The habitats on-site are of low ecological value, are easily replaced or replicated, and do not provide linkages between the Site and habitats of conservation value; therefore, the on-site habitats have all been given low strategic significance.

Biodiversity Units

Habitats

5.3 The Site comprised of mainly hardstanding, with small areas of modified grassland to the south with ornamental shrub (introduced shrub) around the buildings and carpark. In the south of the Site a landscaped area was present, which included modified grassland, introduced shrub, native mixed scrub, ponds and trees.

5.4 A summary description and baseline conditions of the baseline habitats is provided in *Table 2* below and an illustration is provided in *Figure 1*.

Full survey results, baseline condition assessment scores and baseline unit scores are provided in *Appendices A and B*.

Table 2: Summary of Baseline Habitats

Ref	Habitat	Description	Condition	Distinctiveness
G1, G2, G3, G6 / G4, G5	Modified grassland	All of the grasslands on-site are managed for their amenity and aesthetic function, and are classified as modified grassland. They have regularly managed short-swards, with species typical of the grassland type readily identifiable including daisy *Bellis perennis*, self-heal *Prunella vulgaris*, perennial rye grass *lolium perenne*, Yorkshire fog *Holcus lanatus* and creeping buttercup *Ranunculus repens*. The grasslands in Moderate condition had a higher coverage of bare ground and damage, due to intense management and human traffic creating bare patches.	Moderate / Good	Low
-	Mixed scrub	There is one area of mixed scrub on site, to the east of grassland G1, comprising domestic apple *Malus domestica*, crab apple *Malus sylvestris* and holly *Ilex aquifolium*, this was assessed as having poor condition due to it being a small area which has not allowed for the development of features associated with good condition. A further area of scrub is present to the west of grassland G4, which comprised bramble, elder, hawthorn, holly, buddleia, *Viburnum*, *Euonymus*, and *Pyracantha*.	Poor	Medium
-	Introduced shrub	There are small patches of introduced shrub present across the site, consisting	Good	Low

		of Japanese spindle Euonymus japonicus, Hebe stricta, Buddleia Buddlejia and Cotoneaster. In accordance with Defra guidance, this habitat is not subject to a condition assessment.		
P1 & P2	Ponds (non-priority)	There are two ponds present in the southern part of the Site. P1 is approximately 25m x 6m, featuring waterlily *Nymphaea spp*. P2 was approximately 8m x 4m and was very overgrown with ruderal and scrub species, with emergent species present including bulrush *Typha latifolia* and water mint *Mentha aquatica*. Both ponds were wet, but lacked good quality habitats surrounding them, and showed signs of a lack of management which has resulted in high coverage of ruderals, duckweed *Lemna spp* and invasive non-native species (parrots feather *Myriophyllum aquaticum*) being present.	Poor	Medium
-	Individual trees	Eleven large (dbh 61-90cm), twenty-three medium (dbh 31-60cm) and sixty-six small-sized (dbh 7-30cm) trees were identified on-site. The trees included London plane, hybrid black poplar, holm oak, cherry, sycamore, hazel and ash trees. The trees were mainly planted for and managed for their aesthetic and amenity function; with some small trees being self-set or planted within the hedgerows around the carpark. The trees within the grasslands all achieved Moderate or Good condition, while the trees in the carpark were only able to achieve Poor condition due to their confined location and impacts from human activities. The locations, sizes and species of the trees were informed by the UKHab survey and conditions assessment, and the arboricultural report for the Site.	Poor to Good	Medium
-	Developed land sealed surface	The majority of the Site comprises developed land sealed surface, which is made up of car parking areas, pathways, and buildings.	N/A	V. Low

Linear Features

5.5 15 hedgerows were identified within the Site boundary. The hedgerows are all non-native ornamental hedgerows, managed for their aesthetic value. The dominant species present in these hedgerows were Japanese spindle *Euonymus japonicus*, bramble *Rubus fruticosus*, viburnum *Viburnum lantana* and buddleia *Buddlejia*. Ornamental hedgerows do not require a conditions assessment, as they are automatically assigned Poor condition in the BNG Metric.

6.0 PROPOSED DESIGN

6.1 The proposed habitats are shown in *Figure 2*, with habitat retention illustrated in *Figure 3*; based on the Green Infrastructure Strategy by FPCR Environment and Design Ltd (drawing ref: 12641-FPCR-ZZ-ZZ-DR-L-0001 rev P06).

6.2 A summary of the proposed habitats and proposed hedgerow creation and enhancement is provided in *Tables 3 - 5*.

6.3 A brief outline of the habitat creation, enhancement and management principles required to achieve the target condition for each habitat type is given. Following receipt of permission and in accordance with the requirements of the TCPA Sch. 7A, a Habitat Management and Monitoring Plan (HMMP) (or similar document) will be produced to support a Biodiversity Gain Plan to discharge the mandatory BNG condition attached to the permission. This will provide detailed habitat creation methods, and the management and monitoring of proposed habitats for a minimum of 30 years in accordance with the Environment Act (2021).

Habitats

Habitat Retention/Loss *(Figure 3)*

6.4 There will be some small losses of modified grassland G2, G3, G5 and G6 by the proposals, to allow for car parking areas, footpaths and access roads. With the update, an additional 162m^2 of modified grassland in Good condition will be retained in the south of the Site by the proposals, due to moving the proposed footpath to the south of this area.

6.5 There will be a complete loss of the modified grassland identified as G1 and G4. The remaining parts of these grasslands will be maintained in Moderate or Good condition, located largely to the south.

6.6 Two small blocks of mixed scrub to the east of G1 and to the west of G4 will be lost to allow for the proposed buildings; and small areas of introduced shrub will be lost across the Site to accommodate the proposals.

6.7 The ponds in the south of the Site will be retained by the proposals.

6.8 The updates mean that the proposals will result in the loss of 61 trees (instead of the original 59) from the Site, including small, medium and large-sized trees, in Poor to Good condition. The numbers of trees stated within the arboriculture report and the BNG report differ due to arboriculture assessing some trees as groups, whereby under UKHab these are assessed as individual trees, or mapped as scrub habitats, depending on the structure of the habitat present.

Habitat Creation/Enhancement *(Figure 2 / Table 3)*

6.9 Additional amenity grasslands and small areas of introduced shrub will be created around the car parking areas, buildings and along access tracks across the Site. The proposed area of modified grassland in Moderate condition has been reduced by 294m^2, and the proposed area of introduced shrub has been reduced by 610m^2 in the updated plans.

6.10 In place of these area habitats, rain gardens will be created within the car parking area, which will target Moderate condition. The rain gardens will absorb run-off from the carpark and function as sustainable urban drainage systems.

6.11 Introduced shrub around the ponds in the south of the Site will be replaced by native shrub planting (mixed scrub).

6.12 The proposals include the planting of 57 small trees across the Site within this update, opposed to 55 previously. This number differs from the number stated within the arb report, as some of the proposed trees are to be planted along the length of proposed hedgerows, and are therefore categorised as 'hedgerows with trees' under UKHab.

Hedgerows

Habitat Retention/Loss *(Figure 3)*

6.13 The majority of the ornamental hedgerows within the Site will be lost by the proposals, to allow the creation of the buildings, and the re-forming of the car parking areas. H8 will be retained by the proposals.

Hedgerow Creation (*Figure 2 / Table 4*)

6.14 179m of species-rich hedgerows with trees are proposed along the western boundary of the Site, and along the northern edge of grassland G6.

6.15 84m of species-rich hedgerows are proposed along the south-eastern boundary of the Site.

Table 3: Summary of Proposed Habitat Creation

Habitat	Description	Condition	Distinctiveness
Modified Grassland	Small areas of modified grassland will be created around the development area. These areas will be sown with a flowering lawn seed mix (Emorsgate EL1 or similar) to aim for a minimum of six species per m^2. These areas will also include bulb planting, which will provide early opportunities for invertebrates, and aesthetic interest. These areas will be managed in the long-term through regular mowing to prevent scrub and bramble encroachment and they will be monitored for the establishment of any non-native, invasive species (which will be removed where identified).	Moderate	Low
Introduced Shrub	Small areas of introduced shrub will also be created around the developed areas. These habitats will be created and managed for their aesthetic value, but will provide some benefits to wildlife, especially invertebrates and small mammals. A planting list is provided within the Green Infrastructure Strategy (*Appendix C*).	N/A	Low
Mixed Scrub	Areas of mixed scrub will be created around the ponds in the south of the Site. The created scrub will comprise a range of native species (≥5 species). This area will be managed through rotational pruning/coppicing.	Moderate	Medium
Individual Trees	The proposals include the planting of 55 small trees across the Site. The trees will include native species such as field maple *Acer campestre*, oak *Quercus robur*, and whitebeam *Sorbus aria*, as well as non-native fruiting and flowering tree species. A planting list is provided within the Green Infrastructure Strategy (*Appendix C*). Due to the time required for trees to reach 'Good' condition (30 years), the trees will target 'Moderate' condition. The trees will be subject to a program of management to ensure they maintain healthy growth. The trees will be monitored and any individual failures will be replaced on a like for like basis.	Moderate	Medium
Sustainable drainage basin (SUDS)	The rain gardens provided will be a form of SUDS and will target 'Moderate' condition. They will be planted with a range of marginal species which are suited to wetland situations including ornamental elder *Sambucus nigra* cultivars, ornamental dogwood *Cornus sanguinea* 'Midwinter Fire', *Hydrangea* 'Annabelle', Korean feather reed grass *Calamagrostis brachytricha* and Japanese Silver Grass *Miscanthus sinensis*. They will also be managed to ensure a lack of invasive species.	Moderate	Medium

Table 4: Summary of Proposed Hedgerow Creation

Hedgerow Type	Description	Hedgerow Condition	Distinctiveness
Native species-rich hedgerows	84m of species-rich hedgerow will be planted around the built development in the west of the Site to replace sections of hedgerow H8. This will provide links around the Site. The hedgerows will be comprised of native species to provide shelter, pollen, nectar and berries for local wildlife. The hedgerow will target Moderate condition. To achieve this, the following management measures need to be implemented, which will allow the criteria within Appendix B to be achieved; Failed specimens will be replaced during establishment on a like-for-like basis; Hedgerows will be managed to encourage tall (>1.5m), wide (>1.5m) and bushy features; Fertiliser and herbicide use will be prohibited around the hedgerows to reduce nutrient enrichment; A minimum of 2m adjacent to the hedgerows will be managed as 'undisturbed' ground wherever possible.	Moderate	Medium
Species-rich hedgerows with trees	179m of species-rich hedgerow will be planted along the western boundary of the Site to replace hedgerow H13 and H15. This hedgerow will contain trees, at least every 20m, which means they will fall into 'hedgerow with trees' under UKHab. The hedgerows will be managed in the same way as those above, with the trees maintained in the same was as the individual trees outlined above.	Moderate	High

7.0 STATUTORY BNG METRIC

7.1 The habitat retention, enhancement and creation proposals highlighted within this report have all been inputted into the Statutory Biodiversity Metric. *Table 6* provides a summary of the headline results of the assessment completed for the proposals.

Table 5: Statutory Biodiversity Metric Headline Results

Baseline	Habitat Units	8.70
	Hedgerow Units	1.03
Post-Intervention	Habitat Units	6.68
	Hedgerow Units	2.21
Total Net Unit Change	Habitat Units	**-2.02**
	Hedgerow Units	**+1.18**
Total Net Percentage Change	Habitat Units	**-23.22%**
	Hedgerow Units	**+115.03%**

7.2 The current proposals will result in an overall loss of -2.02 habitat units on-site, largely due to the loss of individual trees from the Site.

7.3 The scheme will seek to deliver compensatory units off-site in order to achieve the mandatory 10% Net Gain in biodiversity units required by the Environment Act. It is noted that under current proposals, a minimum of 3.01 units will be required to achieve a 10% net gain.

7.4 The proposals will result in a net gain in hedgerow units, of +1.18 / +115.03%.

Habitat Trading

Hedgerows

7.5 The proposals have effectively compensated for the loss of predominantly non-native hedgerows on-site, through the creation of higher distinctiveness and better-quality hedgerows. This has led to a net gain in excess of 10% for hedgerows, and the proposals meet the Trading Rules.

Habitats

7.6 The proposals result in an overall net loss and fail the Trading Rules due to the loss of scrub and individual trees from the Site, which are medium distinctiveness habitats; this is despite the proposed planting of 57 individual trees and species-rich hedgerows with trees on-site.

7.7 The proposals cannot provide enough units to compensate for the loss of these habitats on-site, and therefore an off-site solution will be required to deliver these units. To meet the Trading Rules at least 0.04 units will need to be provided by scrub (or high distinctiveness) habitats, and 2.39 units provided by individual tree (or high distinctiveness) habitats; the remaining units required to achieve a 10% gain (2.43-2.89=0.46) can be provided by any habitat type.

Compensation

7.8 Compensatory units will be delivered through the following options, in order of preference and in accordance with the Biodiversity Net Gain Hierarchy:

- Purchasing Units from a Local Habitat Bank: Where an agreement cannot be sought for bespoke compensation, units can be purchased from any habitat banks run by the local

planning authority or by a private provider. This will be delivered within Littlehampton or the surrounding area where possible.

- Purchasing Units from a Nearby Habitat Bank: Where units are not available in Littlehampton, units will be purchased from a habitat bank in an adjacent Local Planning Authority Boundary/National Character Area.
- Purchasing Units from a National Habitat Bank: Where local habitat bank cannot be found, units can be purchased from a habitat bank elsewhere in England. Proximity will be considered while sourcing units, with the closest available units preferred.
- Purchasing Statutory Credits: Where units cannot be sought from a national habitat bank, statutory credits will be purchased. A sufficient number of units will be purchased to both meet the trading rules and to deliver the minimum 10% net gain requirement.

7.9 Units will only be purchased from Sites that are registered on Natural England's BNG Sites Register. Consequently, they will have been secured under a minimum 30-year legal agreement with habitat enhancements to be delivered through an agreed Habitat Management and Monitoring Plan (HMMP).

7.10 The delivery of off-site habitat units will be secured through the mandatory Biodiversity Net Gain condition imposed by the Environment Act, 2021. Details of the off-site provision will be supplied as part of a Biodiversity Gain Plan which is to be submitted following receipt of planning permission in accordance with the Environment Act 2021 requirements.

7.11 HMMP will also be provided as part of a Biodiversity Gain Plan which, in accordance with the requirements of the Environment Act, will be provided following receipt of full planning permission. This HMMP will provide detail on how creation, retained, and enhanced habitats across the Site that are significantly contributing to the Site's BNG will be managed for a minimum of 30 years.

Additional On-Site Faunal Enhancements

7.12 The Ecological Appraisal (FPCR, May 2025) also recommends that nest boxes for birds and roost boxes for bats are incorporated in the scheme.

N

0 25 50 m

Red Line Boundary

Off-site Land

Hedgerow Baseline

Non-native and ornamental hedgerow

Habitats Baseline

Developed land; sealed surface

Introduced shrub

Mixed scrub

Modified grassland

Ponds (non-priority habitat)

Individual Trees Baseline

Existing Large Urban Tree

Existing Medium Urban Tree

Existing Small Urban Tree

date
14/05/25

drwn/chkd
HMK / OMS / CHK

client
Hallway Properties Limited

project
Land at Norway Lane, Littlehampton

title
BASELINE HABITAT PLAN

scale
1:1,000 @ A3

number
FIGURE 1

rev
A

FPCR | environment & design

\\FPCR-FS-01\Projects2\12600\12641\ECO\QGIS\12641 BNG - v0.1\12641 BNG.qgs

t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

date
24/10/25

drwn/chkd
HMK / OMS / CHK

client
Hallway Properties Limited

project
Land at Norway Lane, Littlehampton

title
PROPOSED HABITAT PLAN

scale
1:1,000 @ A3

number
FIGURE 2

rev
D

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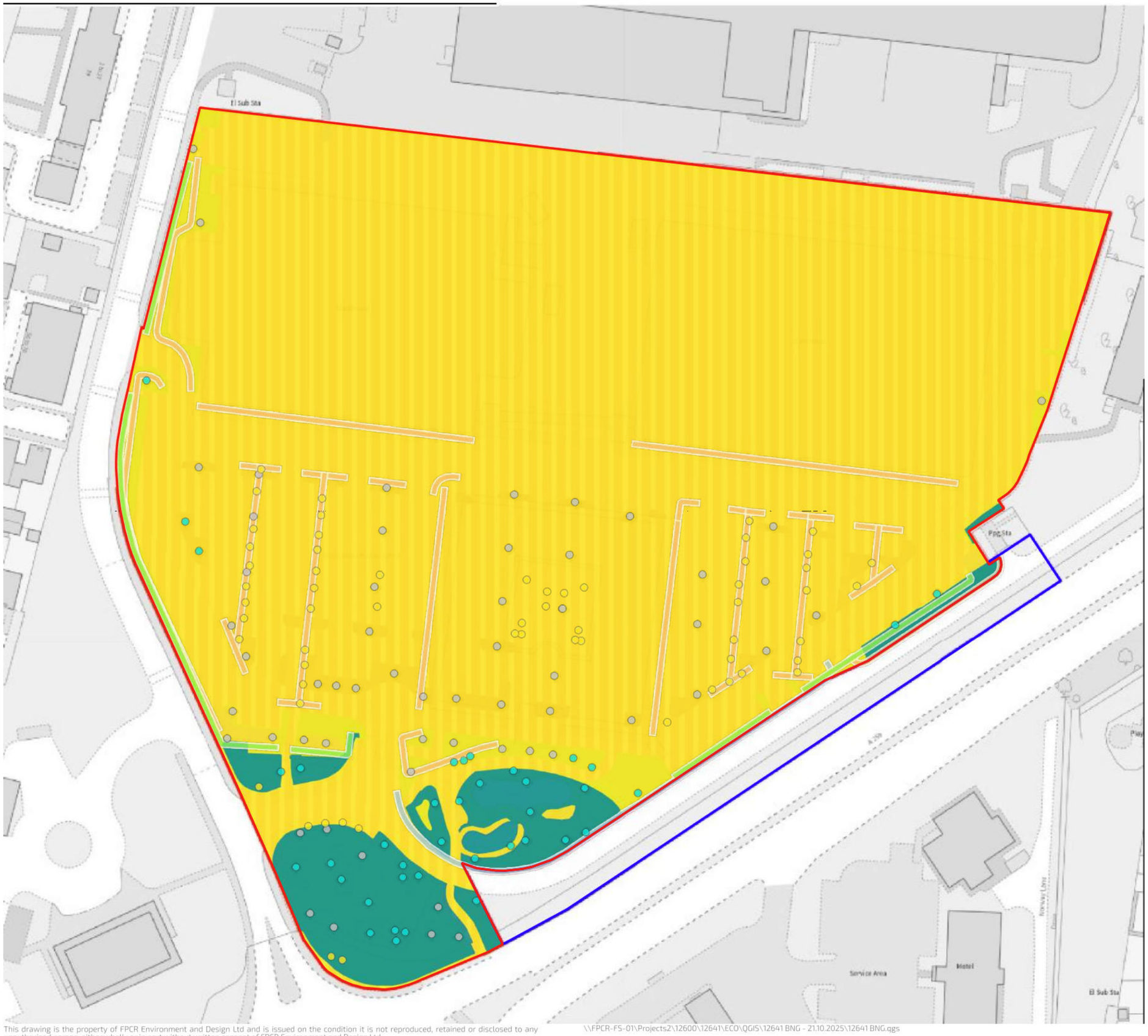

N

0 25 50 m

Red Line Boundary

Off-site Land

Habitats

Retained

Lost

Hedgerows

Created

Retained

Lost

Individual Trees

Created

Retained

Lost

date
24/10/25

drwn/chkd
HMK / OMS / CHK

client
Hallway Properties Limited

project
Land at Norway Lane, Littlehampton

title
HABITAT RETENTION PLAN

scale
1:1,000 @ A3

number
FIGURE 3

rev
C

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N

0 25 50 m

Red Line Boundary

Off-site Land

Baseline Habitat Condition

Good

Moderate

Poor

N/A - Other

Condition Assessment N/A

Baseline Habitat Distinctiveness

Medium

Low

V.Low

Baseline Hedgerow Condition

Poor

N/A

Baseline Hedgerow Distinctiveness

V.Low

N/A

date 14/05/25

drwn/chkd HMK / OMS

client

Hallway Properties Limited

project

Land at Norway Lane, Littlehampton

title

BASELINE HABITAT CONDITION AND DISTINCTIVENESS PLAN

scale 1:1,000 @ A3

number

FIGURE 4

rev -

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N

0 25 50 m

Red Line Boundary

Off-site Land

Proposed Habitat Condition

Good

Moderate

Poor

N/A - Other

Condition Assessment N/A

Proposed Habitat Distinctiveness

Medium

Low

V.Low

Proposed Hedgerow Condition

Moderate

Poor

N/A

Proposed Hedgerow Distinctiveness

High

Medium

V.Low

N/A

Proposed Tree Condition

Poor

Moderate

Good

Proposed Tree Distinctiveness

Medium

date 24/10/25

drwn/chkd HMK / OMS / CHK

client

Hallway Properties Limited

project

Land at Norway Lane, Littlehampton

title

PROPOSED HABITAT CONDITION AND DISTINCTIVENESS PLAN

scale 1:1,000 @ A3

number

FIGURE 5

rev **C**

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APPENDIX A: BASELINE HABITAT – STATUTORY CONDITION ASSESSMENTS

Grassland (Low Distinctiveness)						
Statutory Condition Criteria Assessed	**G1**	**G2**	**G3**	**G4**	**G5**	**G6**
There must be 6-8 species per m2, including at least 2 forbs. Note - if a grassland has 9 or more species per m2 it should be classified as a moderate distinctiveness grassland habitat type. NB - this criterion is non-negotiable for achieving moderate or good condition.	✓	✓	✓	✓	✓	✓
Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20 per cent is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	×	×	✓	✓	×	×
Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area.	✓	✓	×	✓	✓	✓
Physical damage evident in less than 5% of total grassland area, such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities.	×	✓	✓	✓	✓	×
Cover of bare ground between 1% and 10%, including localised areas, for example, rabbit warrens.	×	×	×	×	✓	×
Cover of bracken less than 20%.	✓	✓	✓	✓	✓	✓
There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981)	✓	✓	✓	✓	✓	✓
Total Passes	4	5	5	6	6	4
Baseline Condition	Moderate	Moderate	Moderate	Good	Good	Moderate

Ponds		
Statutory Condition Criteria	**P1**	**P2**
The pond is of good water quality, with clear water (low turbidity) indicating no obvious signs of pollution. Turbidity is acceptable if the pond is grazed by livestock.	✓	✓
There is semi-natural habitat (i.e. moderate distinctiveness or above) for at least 10 m from the pond edge for its entire perimeter.	×	×
Less than 10% of the pond is covered with duckweed or filamentous algae.	×	✓
The pond is not artificially connected to other waterbodies, either via agricultural ditches or artificial pipework.	✓	✓
Pond water levels can fluctuate naturally throughout the year. No obvious artificial dams, pumps or pipework.	✓	✓
There is an absence of non-native plant and animal species as listed on the WFD UKTAG High Impact Species List1.	×	×
The pond is not artificially stocked with fish. If the pond naturally contains fish, it is a native fish assemblage at low densities.	✓	✓
Emergent, submerged or floating (excluding duckweeds)2 plants cover at least 50% of the pond area that is less than 3 m deep.	×	×
The surface is no more than 50% shaded by adjacent trees and scrub.	✓	×
Total Passes	5	5
Baseline Condition	Poor	Poor

Mixed Scrub	
Statutory Condition Criteria Assessed	**S1**
Habitat is representative of UKHab description (where in its natural range) and closely matches the characteristics of the scrub type. At least 80% of the scrub is native, and there are at least three woody species, with no single species comprising more than 75% of the cover (except hazel, common juniper, sea buckthorn or box, which can be up to 100% cover).	×
There is a good age range – all the following are present: seedlings, saplings, young shrubs and mature/veteran shrubs.	×
There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981) and species indicative of sub-optimal condition* make up less than 5% of ground cover.	✓
The scrub has a well-developed edge with scattered scrub and tall grassland and/or forbs present between the scrub and adjacent habitat(s).	×
There are clearings, glades or rides present within the scrub, providing sheltered edges.	×
Total Passes	1
Baseline Condition	Poor

	Individual Trees																
Statutory Condition Criteria	**T3, T64**	**T4, T5, T50**	**T65**	**T6, T12, T13, T18, T25, T51**	**T16, T27, T42, T47, T49**	**T32. T63**	**T44, T46, T48**	**T61, T62**	**T7, T9, T11, T17, T20, T21, T23, T24, T26, T38, T43, T52, T54**	**T14, T15**	**T53, T55, T58, T59**	**T8, T10**	**T66, G10, G11**	**T30, T31, T33, T34, T35, T36, T37, T39, T40, T41, T56, T57 G5**	**G10(A)**	**G10(B)**	**G10(C)**
The Tree is a native species (or more than 70% within the block are native species)	×	×	✓	×	×	✓	×	✓	×	×	×	✓	✓	✓	✓	×	×
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).	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
The tree is mature (or more than 50% within the block are mature). A mature tree is 2/3 its expected fully mature height for the species	✓	✓	×	✓	✓	✓	✓	✓	×	✓	✓	✓	×	×	✓	✓	✓
There is little or no evidence of an adverse impact on tree health by anthropogenic activities such as vandalism or herbicide use. There is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	×	×	×	×	×	×	×	✓	×	×	×	×	×	×	×	×	×
Micro-habitats for birds, mammals and insects are present e.g. presence of deadwood, cavities, ivy or loose bark.	×	×	×	×	×	×	×	×	×	✓	✓	✓	×	×	×	×	×
More than 20% of the tree canopy area is oversailing vegetation beneath.	✓	×	✓	×	×	×	×	✓	×	×	×	×	✓	×	×	✓	✓
Total Passes	3	2	3	2	2	3	2	5	1	3	3	4	3	2	3	3	3

	Individual Trees																
Statutory Condition Criteria	**T3, T64**	**T4, T5, T50**	**T65**	**T6, T12, T13, T18, T25, T51**	**T16, T27, T42, T47, T49**	**T32. T63**	**T44, T46, T48**	**T61, T62**	**T7, T9, T11, T17, T20, T21, T23, T24, T26, T38, T43, T52, T54**	**T14, T15**	**T53, T55, T58, T59**	**T8, T10**	**T66, G10, G11**	**T30, T31, T33, T34, T35, T36, T37, T39, T40, T41, T56, T57 G5**	**G10(A)**	**G10(B)**	**G10(C)**
Baseline Condition	Moderate	Poor	Moderate	Poor	Poor	Moderate	Poor	Good	Poor	Moderate	Moderate	Moderate	Moderate	Poor	Moderate	Moderate	Moderate
Size of trees	M	M	M	M	L	M	M	M	S	S	L	S	S	S	S	S	L

APPENDIX B: PROPOSED HABITAT CONDITION: STATUTORY BNG CONDITIONS ASSESSMENTS

Grassland (Low Distinctiveness)	
Statutory Condition Criteria	**Proposed grasslands**
There must be 6-8 species per m2, including at least 2 forbs. Note - if a grassland has 9 or more species per m2 it should be classified as a moderate distinctiveness grassland habitat type. NB - this criterion is non-negotiable for achieving moderate or good condition.	Target
Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20 per cent is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Not targeted
Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area.	Target
Physical damage evident in less than 5% of total grassland area, such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities.	Not targeted
Cover of bare ground between 1% and 10%, including localised areas, for example, rabbit warrens.	Target
Cover of bracken less than 20%.	Target
There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981)	Target
Target # of Passes	5
Target Condition	Moderate

Mixed Scrub	
Statutory Condition Criteria Assessed	**Proposed mixed scrub**
Habitat is representative of UKHab description (where in its natural range) and closely matches the characteristics of the scrub type. At least 80% of the scrub is native, and there are at least three woody species, with no single species comprising more than 75% of the cover (except hazel, common juniper, sea buckthorn or box, which can be up to 100% cover).	Target
There is a good age range – all the following are present: seedlings, saplings, young shrubs and mature/veteran shrubs.	Not targeted
There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981) and species indicative of sub-optimal condition* make up less than 5% of ground cover.	Target
The scrub has a well-developed edge with scattered scrub and tall grassland and/or forbs present between the scrub and adjacent habitat(s).	Target
There are clearings, glades or rides present within the scrub, providing sheltered edges.	Not targeted
Target # of Passes	3
Target Condition	Moderate

Individual Trees	
Statutory Condition Criteria Assessed	**Proposed trees**
The Tree is a native species (or more than 70% within the block are native species)	Depending on species
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).	Target
The tree is mature (or more than 50% within the block are mature). A mature tree is 2/3 its expected fully mature height for the species	Target, within 30 years
There is little or no evidence of an adverse impact on tree health by anthropogenic activities such as vandalism or herbicide use. There is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Not targeted
Micro-habitats for birds, mammals and insects are present e.g. presence of deadwood, cavities, ivy or loose bark.	Not targeted
More than 20% of the tree canopy area is oversailing vegetation beneath.	Target
Target # of Passes	3 or 4
Target Condition	Moderate

Hedgerows		
Statutory Condition Criteria Assessed	**Proposed hedgerows**	**Proposed hedgerows with trees**
A1 Height >1.5m average along length	Target	Target
A2 Width >1.5m average along length	Not targeted	Not targeted
B1 Gap between ground and base of canopy <0.5 m for >90% of length (unless 'line of trees')	Target	Target
B2 Gaps make up <10% of total length and no canopy gaps >5 m (access points and gates excluded from <5m)	Target	Target
C1 >1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length measured from outer edge of hedgerow, and is present on at least one side of the hedge (at least)	Not targeted	Not targeted
C2 Plant species indicative of nutrient enrichment (nettles, docks, cleavers) dominate <20% cover of the area of undisturbed ground	Target	Target
D1 >90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA3) and recently introduced species.	Target	Target
D2 >90% of the hedgerow or undisturbed ground is free of damage caused by human activities	Not targeted	Not targeted
E1 There is more than one age-class (or morphology) of trees present (young, mature, veteran, ancient) and there is on average at least one present per 20-50m of hedgerow. (A mature tree is one that is at least 2/3 expected fully mature height for the species)	Not applicable	Not targeted
E2 At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity	Not applicable	Target
Expected # of Failures	3	4
Target Condition	Moderate	Moderate

Sustainable Drainage Basins (rain gardens)	
Statutory Condition Criteria Assessed	**Proposed SUDS**
A Vegetation structure is varied, providing opportunities for insects, birds and bats to live and breed. A single ecotone (i.e. scrub, grassland, herbs) should not account for more than 80% of the total habitat area.	Target
B The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Not targeted
C Invasive non-native species (Schedule 9 of WCA) and those detrimental to native wildlife cover less than 5% of total vegetated area. For green roofs also include cover of *Buddleia davidii*. **NB - To achieve GOOD condition, criterion 3 must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).**	Target
E1 Plant species are mostly native. If non-native species are present, they should not be detrimental to the habitat or native wildlife	Not targeted
E2 The vegetation is comprised of plant species suited to wetland or riparian situations	Target
Expected # of Failures	3
Target Condition	Moderate

APPENDIX C: GREEN INFRASTRUCTURE STRATEGY

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Ordnance Survey base mapping - supplied by client.

Notes:

- To be read in conjunction with RGP Architects drawing no: 11631-PL08_J
- Root Barrier requirements based on Pinnacle drainage strategy: DR-C-02300-P03-Proposed Drainage Layout

- Site Boundary
- Ownership Boundary
- Existing trees to be retained
- Existing hedgerow to be retained
- Existing site access
- Existing ponds
- Proposed tree planting (Trees located in hardstanding within car park to be located in tree pit/crating system)
- Proposed hedgerow planting
- Proposed footpaths in Resin Bound Gravel
- Proposed footpaths in Tarmac
- Paved Footpaths
- Proposed Permeable Paving Surface
- Proposed shrub planting (Low level planting to maintain visibility splays across car park area)
- Proposed Grassland (Amenity)
- Proposed bulb planting
- Proposed Rain Gardens
- History Trail Route
- History Trail Route - Points of Interest
- Tactile Paving
- Root Barrier Required Against Proposed Drainage Routes
- Additional Root Treatment Required Against Existing Drainage Routes

Indicative Species List

Proposed Specimen Tree Planting

Species
Acer campestre
Sorbus aria
Malus Sylvestris
Corylus colurna
Platanus x hispanica
Prunus avium
Quercus robur
Quercus ilex

Proposed Native Hedgerow Planting

Species
Fagus sylvatica
Cornus sanguinea
Corylus avellana
Crataegus monogyna
Sambucus nigra
Ligustrum vulgare

Proposed Ornamental Planting

Species
Buxus sempervirens
Ceanothus thyrsiflorus 'Repens'
Cornus sanguinea 'Midwinter Fire'
Euonymus europaeus
Euonymus fortunei
Lavandula angustifolia 'Hidcote'
Ligustrum vulgare
Lonicera ligustrina var. pileata
Photinia fraseri
Sarcococca confusa
Skimmia japonica 'Rubella'
Spiraea japonica 'Anthony Waterer'
Viburnum davidii

Proposed Amenity Grassland
Emorsgate EL1 Flowering Lawn Mixture - or similar approved

Proposed Bulb Planting

Species
Narcissus
Crocus vernus
Crocus flavus
Galanthus nivalis

Proposed Specimen Tree Planting Suitable For Rain Gardens

Species
Acer rubrum
Betula nigra
Cratagus x media
Liquidambar styraciflua
Ulmus 'New Horizon'

Proposed Planting for Raingardens

Species
Sambucus nigra cultivars
Cornus sanguinea Midwinter Fire
Hydrangea Annabelle'
Rosa rugosa
Calamagrostis brachytricha
Deschampsia cespitosa
Miscanthus sinensis

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0 25 50m

client
Hallway Properties Limited

project
Land at Norway Lane, Littlehampton

title
Green Infrastructure Strategy

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FPCR Environment and Design Ltd
Registered Office: Lockington Hall, Lockington, Derby DE74 2RH
Company No. 07128076. [T [redacted] [W] www.fpcr.co.uk