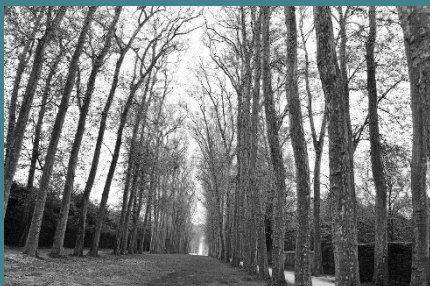


FPCR | environment  
& design



# Biodiversity Net Gain Report

Client

**Hallway Properties Ltd**

Project

**Land at Norway Lane,  
Littlehampton**

Date

**May 2025**

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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

## 1.0 NON-TECHNICAL SUMMARY

<b>Report Scope and Methodology</b>
<p>FPCR were commissioned by Hallway Properties Ltd to undertake a Biodiversity Net Gain Assessment of Land at Norway Lane, Littlehampton.</p> <p>The proposals for the Site include the conversion and sub-division of two warehouse units (Unit 5 &amp; 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.</p>
<b>Habitat Baseline</b>
<p>The Site is dominated by habitats of low ecological value including built environments and introduced shrub, and amenity grassland.</p>
<b>Habitat Proposals</b>
<p>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. 59 individual trees will be lost by the proposals.</p> <p>The proposals include the creation of additional areas amenity grassland, native mixed scrub, introduced shrub, and the planting of 55 individual trees.</p>
<b>Conclusion</b>
<p>The proposals will lead to a Biodiversity net loss of 2.14 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.</p>

## 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 P06).
- 2.4 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

- 2.5 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.
- 2.6 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<sup>2</sup>, 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
<i>Confirmation that the Site is believed to be subject to the mandatory BNG condition.</i>	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.
<i>The pre-development biodiversity value of the Site, either on the data of application or an earlier proposed date (as appropriate).</i>	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.
<i>Where an earlier date is proposed, provide the reasons for proposing that date.</i>	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 19 <sup>th</sup> 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).
<i>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.</i>	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.
<i>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).</i>	This statement confirms that FPCR and Hallway Properties Limited are not aware of any habitat degradation on-site.
<i>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)</i>	This statement confirms that no irreplaceable habitat has been identified on-site.
<i>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).</i>	<i>Figure 1</i> shows the baseline habitats present on-site on the proposed relevant date (19 <sup>th</sup> 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 12<sup>th</sup> 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 P06), 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 <i>Bellis perennis</i> , self-heal <i>Prunella vulgaris</i> , perennial rye grass <i>Lolium perenne</i> , Yorkshire fog <i>Holcus lanatus</i> and creeping buttercup <i>Ranunculus repens</i> . 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 <i>Malus domestica</i> , crab apple <i>Malus sylvestris</i> and holly <i>Ilex aquifolium</i> , 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, <i>Viburnum</i> , <i>Euonymus</i> , and <i>Pyracantha</i> .	Poor	Medium
-	Introduced shrub	There are small patches of introduced shrub present across the site, consisting	Good	Low

		of Japanese spindle <i>Euonymus japonicus</i> , <i>Hebe stricta</i> , <i>Buddleia Buddlejia</i> and <i>Cotoneaster</i> .  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 <i>Nymphaea spp</i> . P2 was approximately 8m x 4m and was very overgrown with ruderal and scrub species, with emergent species present including bulrush <i>Typha latifolia</i> and water mint <i>Mentha aquatica</i> . 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 <i>Lemna spp</i> and invasive non-native species (parrots feather <i>Myriophyllum aquaticum</i> ) 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 *Buddleia*. 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. 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.
- 6.5 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.
- 6.6 The ponds in the south of the Site will be retained by the proposals.
- 6.7 The proposals will result in the loss of 59 trees 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*)

- 6.8 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.
- 6.9 Introduced shrub around the ponds in the south of the Site will be replaced by native shrub planting (mixed scrub).
- 6.10 The proposals include the planting of 55 small trees across the Site. 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)

- 6.11 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)

- 6.12 179m of species-rich hedgerows with trees are proposed along the western boundary of the Site, and along the northern edge of grassland G6.
- 6.13 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 <sup>2</sup> . 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 <i>Acer campestre</i> , oak <i>Quercus robur</i> , and whitebeam <i>Sorbus aria</i> , 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

**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;	Moderate	Medium

	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.		
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 way 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	6.56
	Hedgerow Units	2.21
Total Net Unit Change	Habitat Units	-2.14
	Hedgerow Units	+1.18
Total Net Percentage Change	Habitat Units	-24.60%
	Hedgerow Units	+115.03%

7.2 The current proposals will result in an overall loss of -2.14 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 55 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 2.35 units provided by individual tree (or high distinctiveness) habitats; the remaining units required to achieve a 10% gain ( $2.39 - 3.02 = 0.62$ ) 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.

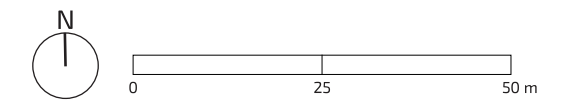
7.9 Units will only be purchased from Sites that are registered on Natural England's BNG Sites Register. Consequently, they will have been secured under a minimum 30-year legal agreement with habitat enhancements to be delivered through an agreed Habitat Management and Monitoring Plan (HMMP).

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.



- 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**



- Red Line Boundary
- Off-site Land
- Proposed Habitats**
- Developed land; sealed surface
- Introduced shrub
- Mixed scrub
- Modified grassland
- Ponds (non-priority habitat)
- Proposed Hedgerows**
- Non-native and ornamental hedgerow
- Species-rich native hedgerow
- Species-rich native hedgerow with trees
- Proposed Individual Trees**
- Proposed Small Urban Tree
- Retained Large Urban Tree
- Retained Medium Urban Tree
- Retained Small Urban Tree

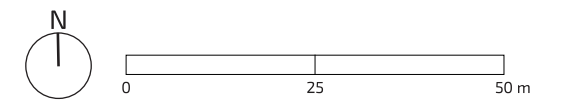
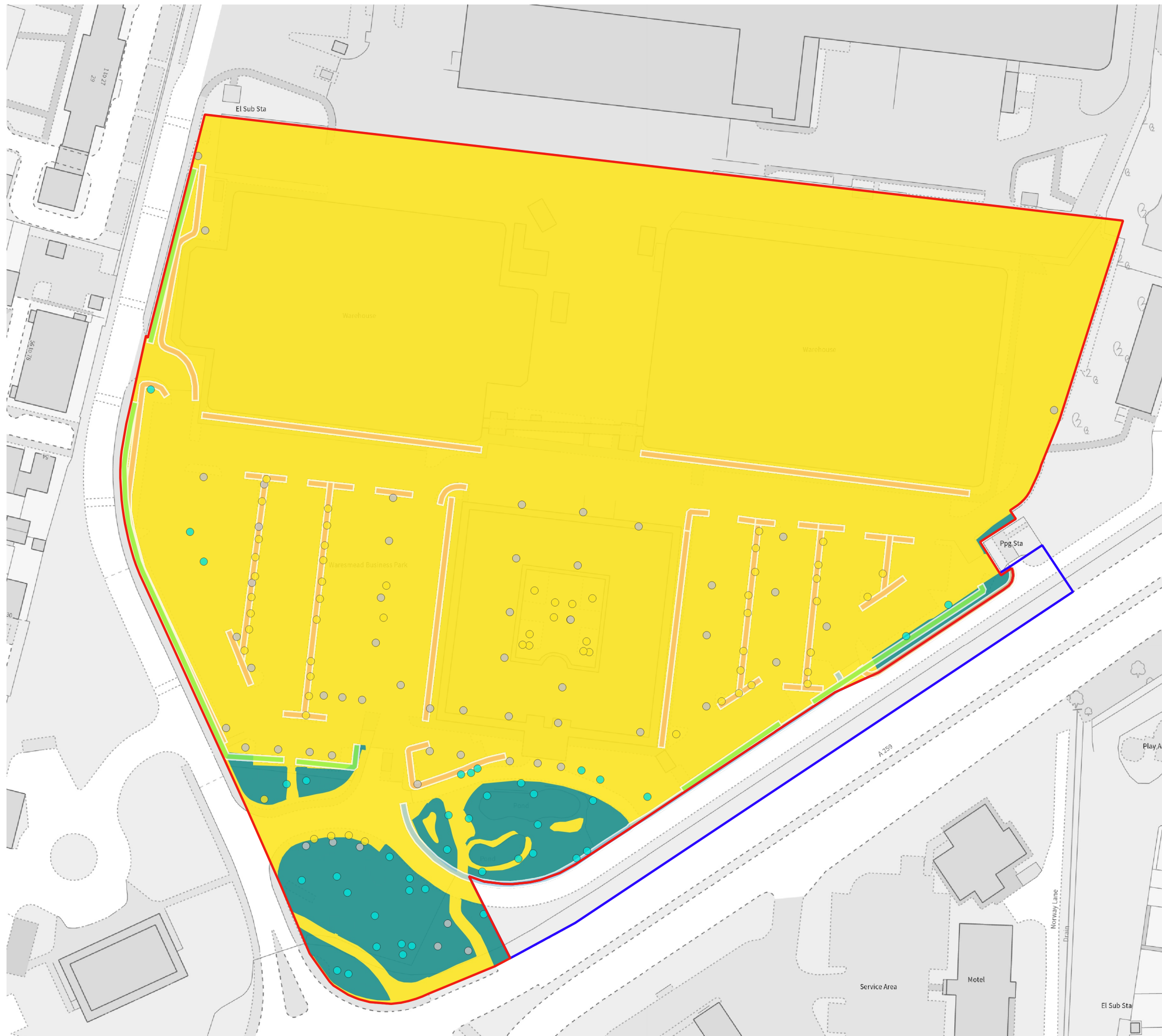
date 14/05/25 drwn/chkd  
HMK / OMS / CHK

client **Hallway Properties Limited**

project **Land at Norway Lane, Littlehampton**

title **PROPOSED HABITAT PLAN** scale  
1:1,000 @ A3

number **FIGURE 2** rev  
**A**



- Red Line Boundary
- Off-site Land
- Habitats
- Retained
- Lost
- Hedgerows
- Created
- Retained
- Lost
- Individual Trees
- Created
- Retained
- Lost

date 14/05/25 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 **A**