

Biodiversity Net Gain Assessment
Sefter Farm, Pagham Road, Bognor Regis PO21 3PX
March 2025
Client: Barfoots of Botley Ltd

Quality Assurance		
Report date:	Version:	Author:
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Report conditions:	The content is provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. The methods and recommendations in this report are based on the following: • CIEEM Guidelines for Ecological Report Writing 2017 (CIEEM, 2017) • Biodiversity Net Gain (BNG) Report & Audit Templates Version 1 (CIEEM, July 2021) • Natural England (2023). The Biodiversity Metric 4.0 User Guide. Natural England Joint Publication JPO39 Copyright © Imprint Ecology 2025	

Details of Metric Assessment:	
Date the Statutory Metric was published:	21/11/2023
Pre-development biodiversity value of onsite habitats:	Habitat units: 5.30 Hedgerow units: 0.00 Watercourse units: 0.64 Total: 5.94
Has there been any loss or degradation of any onsite habitat(s), resulting from activities carried out before the date the onsite pre-development biodiversity value was calculated?	No
Does the development site have irreplaceable habitats?	No

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1. Executive Summary

Imprint Ecology was commissioned to undertake a Biodiversity Net Gain (BNG) Assessment for land at Sefter Farm, Pagham Road, Bognor Regis PO21 3PX.

The site comprises a mix of developed and modified habitats, including hardstanding, a large agricultural packhouse, modified grassland, bramble and mixed scrub, two artificial waterbodies, and two manmade ditches. There are no hedgerow habitats on-site and no irreplaceable habitats on-site.

The Statutory BNG Metric demonstrates an on-site net gain of 0.98 habitat units (an 18.52% uplift) and 0.36 watercourse units (a 55.79% uplift), satisfying all trading rules and exceeding the 10% BNG requirement.

A Habitat Management and Monitoring Plan (HMMP) may be required by the Local Planning Authority as a condition of the planning application to ensure the long-term success and condition of the created habitats.

The assessment concludes that the development can achieve measurable BNG. The findings should be read in conjunction with the accompanying Ecological Impact Assessment (EclA) (Imprint Ecology, 2025), for a comprehensive understanding of site's ecology and mitigation measures.

2. Introduction

2.1 Background

Imprint Ecology was commissioned by Mr Marshall to undertake a BNG assessment of Sefter Farm, Pagham Road, Bognor Regis PO21 3PX, hereafter referred to as ‘the site’. The proposed development is for a warehouse extension, new hardstanding road surfacing, and reduction of a reservoir.

2.2 Personnel

The assessment has been completed by Emily Luck, BSc (Hons), MCIEEM, MRSB. Emily has six years’ experience carrying out ecological surveys for protected species as well as botanical surveys of sites across southern England.

2.3 Scope of Assessment

This BNG Assessment is valid for a maximum of one year. If there are any alterations to the site conditions, BNG methodologies, or the proposals, the calculations are likely to become invalid, and an ecologist should be contacted for advice. The habitats are assessed and discussed further in the Ecological Impact Assessment (Imprint Ecology, 2025) referred to as the EclA, and this report should be read in conjunction with that report.

2.4 Site Description and Proposals

The site includes a mix of developed and modified habitats, comprising sealed concrete and tarmac surfaces, a large steel-framed agricultural packhouse, gravel track, species-poor modified grassland dominated by common grasses such as perennial rye-grass and red fescue, as well as small patches of bramble and mixed scrub with hazel, goat willow, blackthorn, and hawthorn. A small area of cereal crop lies to the east, under active cultivation. Two large artificial waterbodies, lined and devoid of natural features, are present and offer very low ecological value. Additionally, two manmade drainage ditches cross the site - one with willow saplings shading the inside of the ditch and the other engineered with mown banks, little vegetation structure, and rat activity.

3. Legislation and Policy

3.1 Legislation

The Environment Act 2021 requires developments to deliver a minimum of 10% BNG. The requirement applies to most non-householder planning applications that result in the loss of more than 25m² of vegetated habitat. Developers must calculate BNG using the Biodiversity Metric and secure it for a minimum of 30 years. Options for achieving BNG include on-site measures, off-site enhancements recorded in a national biodiversity gain site register, or the purchase of statutory Biodiversity Credits. Secondary legislation under the Act sets out the procedural and technical requirements, including Habitat Condition Assessments using the Department for Environment, Food & Rural Affairs (DEFRA) methodology and the submission of a completed Statutory BNG Metric. Long-term management of BNG must be secured, e.g. through Section 106 agreements or Conservation Covenants.

3.2 National Policy

The latest National Planning Policy Framework (NPPF, 2024) was published in December 2024. Paragraph 187 states that planning policies and decisions must contribute to and enhance biodiversity and the natural environment by:

- Protecting and enhancing valued landscapes, biodiversity sites, geological features, and soils in line with statutory designations.
- Recognising the intrinsic character and beauty of the countryside, including the benefits of trees, woodlands, and agricultural land.
- Maintaining the character of undeveloped coastal areas while improving public access where appropriate.
- Minimising impacts on biodiversity and delivering net gains, including the establishment of resilient ecological networks and features supporting priority species such as swifts, bats, and hedgehogs.
- Preventing environmental harm from soil, air, water, and noise pollution, as well as land instability.
- Improving local environmental conditions, including air and water quality, informed by relevant policies such as river basin management plans.
- Remediating degraded, contaminated, or unstable land to enhance ecological value.

Paragraph 193 states that local planning authorities must apply the following principles when determining planning applications:

- Avoid significant harm to biodiversity where possible; if unavoidable, harm must be mitigated or compensated for, or planning permission should be refused.
- Development that affects Sites of Special Scientific Interest (SSSI) should not be permitted unless benefits clearly outweigh potential harm.
- Loss or deterioration of irreplaceable habitats (e.g., ancient woodland, veteran trees) should be refused unless there are exceptional reasons and a suitable compensation strategy.
- Development that enhances biodiversity should be supported, particularly where it secures measurable net gains or improves public access to nature.

In addition to the NPPF, Circular 06/2005: Biodiversity and Geological Conservation says, *“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.”*

Circular 06/2005 also provides statutory direction on biodiversity protection within the planning system. It clarifies legal obligations under the Wildlife and Countryside Act 1981, the Conservation of Habitats and Species Regulations 2017, and other key legislation. It outlines:

- The importance of ecological surveys and assessments in development proposals.
- The duty of local authorities to consider biodiversity in planning decisions, ensuring compliance with UK and European laws.
- Requirements for the mitigation hierarchy, ensuring avoidance, mitigation, or compensation for biodiversity impacts.
- The need for protected species licences where development affects legally protected species.

3.3 Local Policy

Policy ENV DM5 – Development and Biodiversity (Arun Local Plan 2018-2031) states that:

“Development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on-site, in accordance with Policy ENV DM5 of the Arun Local Plan 2018-2031. Proposals shall incorporate elements of biodiversity, including green walls, green roofs, bat and bird boxes, as well as landscape features that minimise adverse impacts on existing habitats (whether designated or not).”

Development schemes shall also be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitat areas and open spaces. Together, these provide a network of green spaces, reconnecting isolated sites and facilitating species movement in line with Arun Local Plan objectives.

Where there is evidence of a protected species on a proposed development site, planning applications shall include a detailed survey of the subject species, with measures incorporated into the development scheme to avoid the loss of the species. This includes consideration of any direct or indirect impacts within the application site or any areas outside of the site that may be indirectly affected by the proposals.

All surveys shall be carried out at an appropriate time of year by a qualified and, where appropriate, suitably licensed person, ensuring compliance with Arun Local Plan biodiversity policies.

All developments shall have regard to Natural England's standing advice for protected species, in line with Policy ENV DM5 and the wider Arun Local Plan 2018-2031 requirements."

4. Methods

4.1 Desk Study

The Multi-Agency Geographic Information for the Countryside (MAGIC) online resource was accessed on 16th March 2025 to search for Habitats of Principal Importance listed under the NERC Act within 1km.

To identify local strategic sites and assess potential ecological constraints, the Chichester District Council [Interactive Map](#) was used which covers parts of Sussex outside the Chichester District. This digital mapping tool provides up-to-date spatial data on designated sites, including:

- Sites of Special Scientific Interest (SSSIs)
- Local Nature Reserves (LNRs)
- Special Protection Areas (SPAs) & Special Areas of Conservation (SACs)
- Priority Habitats and Biodiversity Opportunity Areas (BOAs)
- Conservation Areas and Green Infrastructure Networks

4.2 Site Assessment

A botanical assessment was conducted following the UK Habitat Classification (UKHab) system (Version 2.0) on 28th February 2025. While this was outside the optimal botanical survey season, key habitat types, including modified grassland and hedgerows, were easily identifiable. The survey involved a systematic site walkover to identify, classify, and map habitats, supplemented by a review of existing ecological data, aerial imagery, and designated site information. Vegetation communities were assessed against the UKHab Primary Habitat Hierarchy, with dominant species recorded, and habitats categorised using primary and secondary UKHab codes to account for habitat modifications or land-use context. Habitat features were mapped as polygons, lines, or points with spatial references to ensure accurate classification and assessment of ecological value. Within the grassland habitat, four 1m² quadrats were placed in random locations to assess species diversity. The number of species within each quadrat was recorded.

4.3 Biodiversity Metric

Defra's Statutory Biodiversity Metric was used to quantify the proposed changes in biodiversity by comparing the baseline habitats with proposed habitats in terms of their extent, condition, and distinctiveness. Accurate habitat measurements were taken using CADReader and LandApp.

Proposed habitat changes were reviewed against the Metric’s risk multipliers, which account for the difficulty of habitat creation or enhancement, the time required to reach the target condition, and spatial risk factors. These multipliers ensure that the compensation for habitat loss is proportional and reflects the ecological value of the affected area. The output of the Metric provides a robust calculation of BNG, guiding the proposed development to meet statutory requirements and align with local planning policies.

Biodiversity Metric calculations were double checked following the calculations to avoid errors. Habitat calculations were performed to the nearest 10sqm for habitats which is appropriate given the site's scale. Measurements have been accurately transposed into the Site Baseline Habitat Plan and Site Proposed Habitat Plan, both created using LandApp. Where uncertainty remained, habitats were further measured using other detailed scaled drawings and Google Earth Pro.

The completed BNG Metric is provided separately in Excel format and shows the full calculation breakdown for the site. It demonstrates that the trading rules are satisfied and that the site proposals will result in measurable uplift of BNG.

5. Results

A large portion of the site lies within the Chichester Coastal Plain BOA. Therefore, all habitats on-site have been assigned high strategic significance. It is worth noting that there are no hedgerow habitats on-site and no irreplaceable habitats on-site.

5.1 Baseline Habitats On-site

Habitat Type	Size (ha)	Condition	Description
Developed land; sealed surface	0.548	N/A - Other	Hardstanding includes concrete and tarmac surfaces used for road access.
Artificial unvegetated, unsealed surface	0.028	N/A - Other	Small gravel track used for vehicle movement.
Ornamental lake or pond	1.16	Poor	Main waterbody is a large, lined feature with no vegetation or natural value, mapped as ornamental standing water as this is not a medium or high distinctiveness habitat.
Ornamental lake or pond	0.09	Poor	Second waterbody is similar to the above and partially within the red line boundary.
Bramble scrub	0.08	Condition Assessment N/A	Bramble scrub is scattered around site margins and near mixed scrub.
Mixed scrub	0.15	Poor	Mixed scrub is found on the northern and eastern bund, with hazel, goat willow, blackthorn and hawthorn, and no veteran trees.
Modified grassland	0.52	Poor	Modified grassland is species-poor and regularly mown, dominated by rye-grass with occasional creeping buttercup, daisy, self-heal, white clover and dock.
Cereal crops	0.074	Condition Assessment N/A	Cereal crop field is a small intensively managed area with limited ecological value.

5.2 Proposed Habitats On-site

Habitat Type	Size (ha)	Condition (Target)	Description
Developed land; sealed surface	0.445	N/A - Other	A new extension to the packhouse and hardstanding area will result in habitat loss, primarily replacing existing mixed scrub and modified grassland.
Mixed scrub	0.176	Poor	New mixed scrub planting is proposed around the margins of the waterbody to enhance structural diversity and provide cover and foraging opportunities for birds, small mammals and invertebrates. Species to be used will be native thorny and berry-bearing species such as hawthorn, blackthorn, hazel, goat willow, dog rose.

			wild cherry, and dogwood, planted in staggered rows or clumps.
Other neutral grassland	0.31	Moderate	Mixed other neutral grassland will be established in selected areas across the site, using a native wildflower and fine grass seed mix suitable for neutral soils. This habitat will be managed through occasional mowing or cutting to maintain a species-rich sward and encourage pollinators, supporting increased floristic diversity and providing greater habitat distinctiveness than existing modified grassland. The grassland will be established using a wildflower mix such as Emorsgate EM2F, aiming for a minimum of 10 desirable species per m². Ground preparation will involve working from bare soil and/or cutting the existing sward of modified grassland followed by harrowing or raking to expose at least 50% bare soil. Vegetation should be removed, and perennial weeds like thistles and docks controlled. Yellow rattle may be added to suppress vigorous grasses. Sowing is best done in autumn or spring, surface-sown with an inert carrier like sand to aid distribution. In the first year, the sward should be kept short (30–50mm) with regular cuts or grazing until April, followed by a cut in July/August. The grassland should be left briefly to shed seed before removal. Once established, the grassland will be managed with a main cut each summer and light mowing in autumn and winter.
Modified grassland	0.13	Poor	Additional, low diversity grassland will be planted along access paths and less ecologically sensitive areas. This habitat will comprise a basic grass-dominated mix reflecting frequent mowing and disturbance typical of maintained paths, but still offering some foraging value for invertebrates and small animals.

Summary of on-site Habitat Unit change: 0.98 Habitat Unit increase or **18.52% uplift**. BNG trading rules are satisfied.

5.3 Baseline Watercourses On-site

Watercourse Type	Length (km)	Condition	Description
Ditch	0.033	Poor	Shaded by young willow and saplings, with limited vegetation and some green algae. Part of this ditch will be removed to allow for new hard surfacing.
Ditch	0.13	Poor	Shallow ditch with closely mown grass margins and lacks any vegetation structure. Its banks are

			heavily disturbed and contain numerous rat burrows. This ditch is to be removed in full.
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5.4 Proposed Watercourses On-site

Watercourse Type	Length (km)	Condition	Description
Ditch	0.222	Poor	A U-shaped run-off ditch will be created to the north of the new reservoir bund. It is expected to resemble the existing grassy ditch, designed primarily for water management.

Summary of on-site Watercourse Unit change: 0.36 Habitat Unit increase or **55.79% uplift**. BNG trading rules are satisfied.

5.5 Metric Results

Sefter South Extension		Return to results menu		
Headline Results				
Scroll down for final results A				
On-site baseline		Habitat units	5.30	
		Hedgerow units	0.00	
		Watercourse units	0.64	
On-site post-intervention (including habitat retention, creation & enhancement)		Habitat units	6.28	
		Hedgerow units	0.00	
		Watercourse units	0.99	
On-site net change (units & percentage)		Habitat units	0.98	18.58%
		Hedgerow units	0.00	0.00%
		Watercourse units	0.38	55.79%
Off-site baseline		Habitat units	0.00	
		Hedgerow units	0.00	
		Watercourse units	0.00	
Off-site post-intervention (including habitat retention, creation & enhancement)		Habitat units	0.00	
		Hedgerow units	0.00	
		Watercourse units	0.00	
Off-site net change (units & percentage)		Habitat units	0.00	0.00%
		Hedgerow units	0.00	0.00%
		Watercourse units	0.00	0.00%
Combined net unit change (including all on-site & off-site habitat retention, creation & enhancement)		Habitat units	0.98	
		Hedgerow units	0.00	
		Watercourse units	0.38	
Spatial risk multiplier (SRM) deductions		Habitat units	0.00	
		Hedgerow units	0.00	
		Watercourse units	0.00	
FINAL RESULTS				
Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)		Habitat units	0.98	
		Hedgerow units	0.00	
		Watercourse units	0.38	
Total net % change (including all on-site & off-site habitat retention, creation & enhancement)		Habitat units	18.52%	
		Hedgerow units	0.00%	
		Watercourse units	55.79%	
Trading rules satisfied?		Yes ✓		
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	5.30	5.83	0.00
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.64	0.70	0.00
No additional area habitat units required to meet target ✓				
No additional hedgerow units required to meet target ✓				
No additional watercourse units required to meet target ✓				

Figure 5.1: Site Habitat Baseline Plan

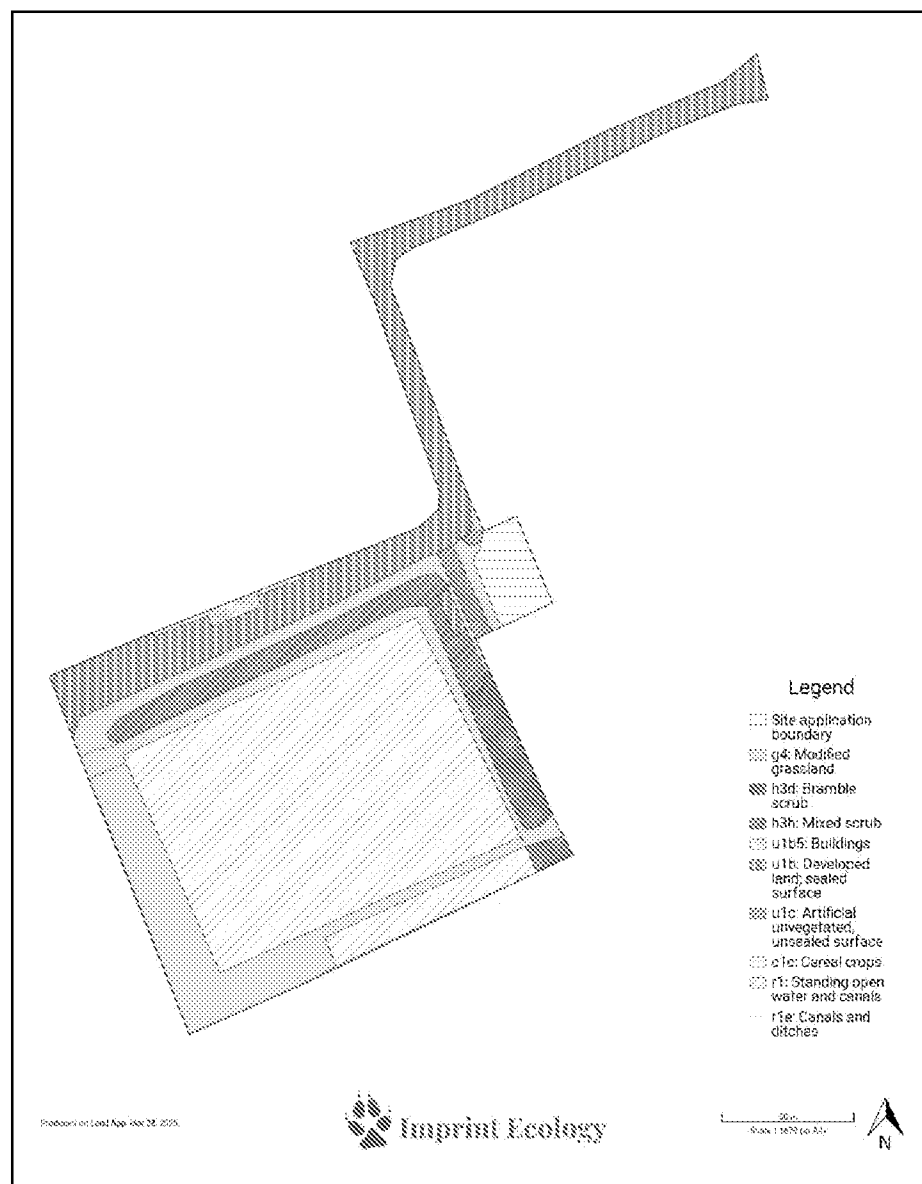
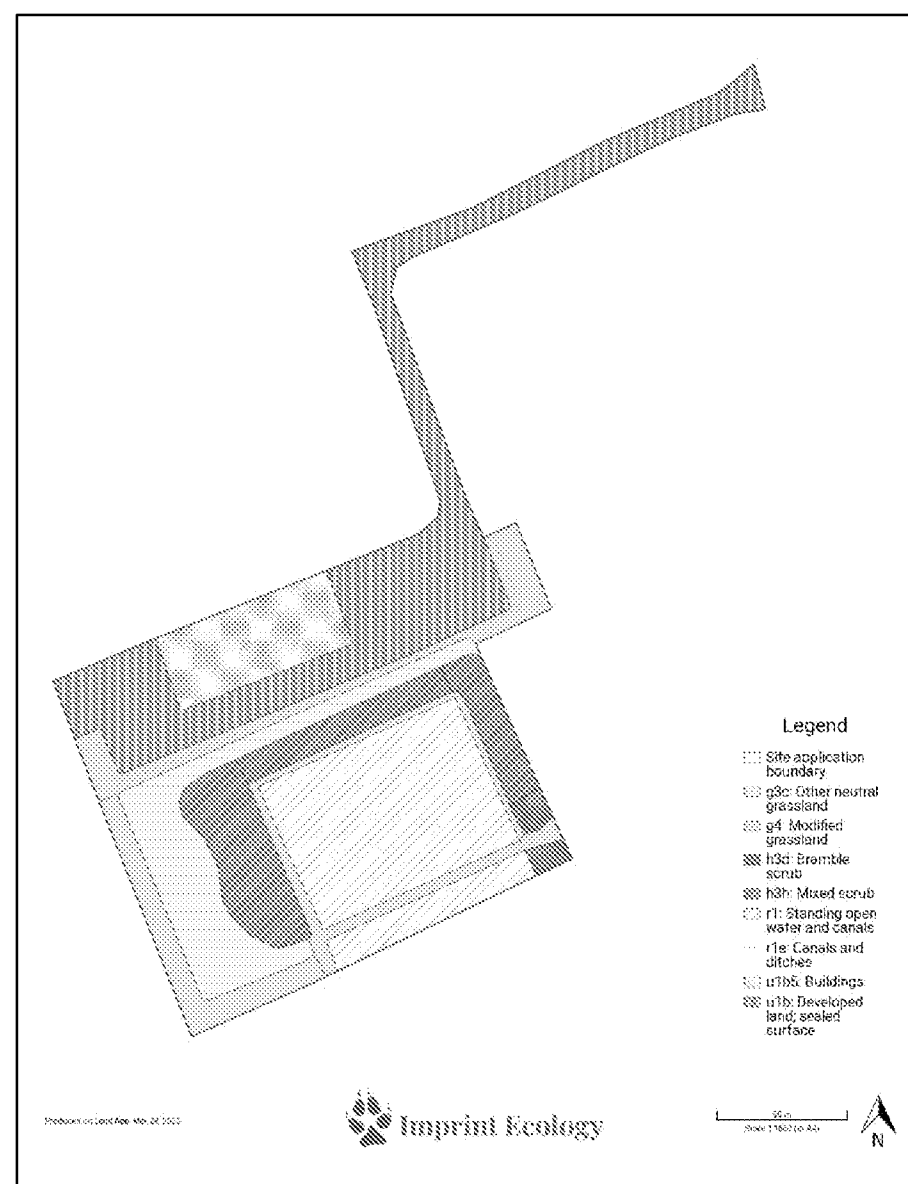


Figure 5.2 Site Proposed Habitat Plan



6. Conclusion

The proposed development at Sefter Farm will result in a measurable and policy-compliant biodiversity net gain through targeted on-site habitat creation and enhancement. The Statutory Biodiversity Metric calculations confirm a net gain of 0.98 habitat units (18.52% uplift) and 0.36 watercourse units (55.79% uplift). These figures demonstrate full compliance with the Environment Act 2021 and exceed the minimum 10% BNG requirement. All trading rules have been satisfied.

A Habitat Management and Monitoring Plan (HMMP) may be required by the Local Planning Authority to secure the long-term delivery of BNG. This plan should include appropriate management prescriptions, monitoring schedules, and mechanisms for adaptive management to ensure that target habitat conditions are reached and maintained for a minimum of 30 years.

7. References

CIEEM (2021). BNG Report and Audit Templates Chartered Institute of Ecology and Environmental Management, Winchester, UK.

CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2018) Guidelines for Ecological Impact Assessment, 1st edition. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM, IEMA, & CIRIA. (2024). Mandatory BNG in England: A guide. Chartered Institute of Ecology and Environmental Management, Winchester, UK.

Imprint Ecology (2025) Ecological Impact Assessment, Porthole Barn, March 2025

Natural England (2025) The Statutory Biodiversity Metric Calculation Tool, Condition Assessments and User Guide.

UK Hab Ltd. (2023). The Habitat Classification Version 2.01.

Appendix 1: Site Photos

Photo 1: View from southeast looking north.



Photo 2: View from southeast looking west.



Photo 3: Bramble scrub

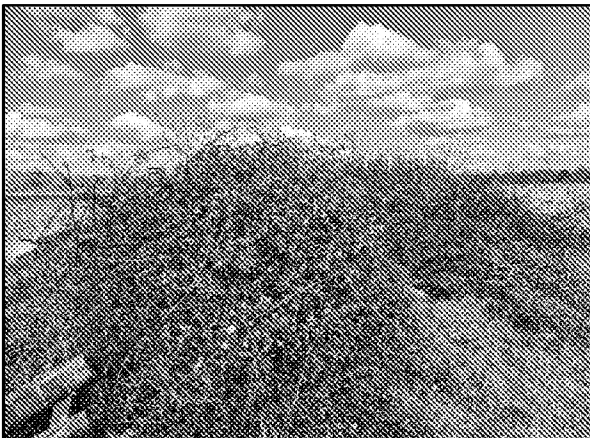


Photo 4: Bramble scrub and mixed scrub



Photo 5: Ditch along east



Photo 6: Ditch along north of scrub



Photo 7: Southeast of access road.



Photo 8: Southeast corner of grassland.



Photo 9: Mixed scrub and grassland.

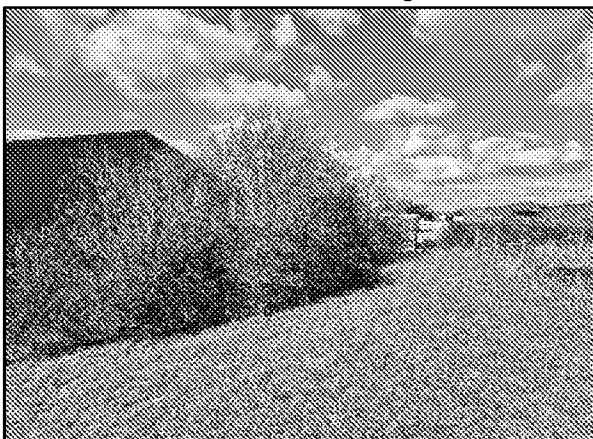


Photo 10: Mixed scrub and grassland.



Photo 11: Mixed scrub behind fence. Reservoir lining beyond.

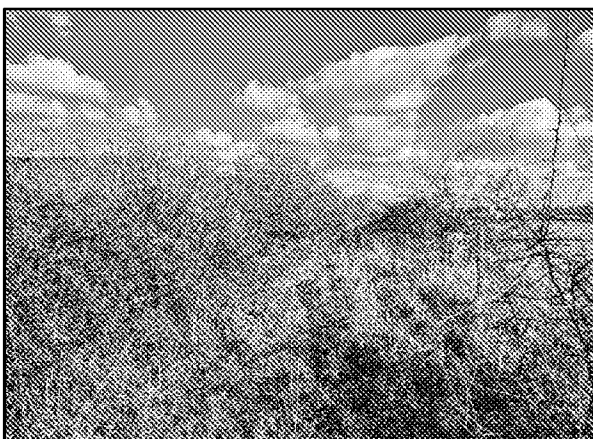


Photo 12: Grassland on western edge of reservoir.

