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Wealden District Biodiversity Net Gain Feasibility Study

Biodiversity Net Gain Site Assessment,
Thresholds Analysis, Off-site Feasibility and
Policy Recommendations

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Feasibility and Policy Recommendations

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Executive Summary

Ramboll was commissioned by Wealden District Council to prepare a Biodiversity Net Gain (BNG) feasibility and evidence base study to support the emerging Wealden Local Plan. The study tests whether a BNG requirement above the statutory 10% minimum could be justified, deliverable and proportionate for developments in Wealden District, with particular focus on a desirable 20% ambition established in draft policy and alternative 15% and 25% thresholds for testing. The work is intended to inform the Council's wider Local Plan viability assessment.

The assessment considered representative development typologies, including large greenfield, medium greenfield, small greenfield, medium brownfield windfall and small industrial/employment sites. For each typology, baseline and post-development habitat assumptions were developed using available site information, desk-based habitat evidence, sample walkover checks and professional judgement. The Defra Biodiversity Metric was then used to test the extent to which different BNG thresholds could be achieved on-site, and where off-site biodiversity units would be required to address any shortfall.

The results show that deliverability varies significantly by typology. Large greenfield sites have the greatest capacity to deliver BNG within the site boundary and can deliver approximately 20% BNG within the assumed development parameters. Medium greenfield sites can achieve above 10% on-site but require increasing off-site BNG provision at higher thresholds. Small greenfield, medium brownfield and small industrial/employment typologies are more constrained and are likely to require some off-site biodiversity unit provision even at lower thresholds, although the absolute number of biodiversity units required may be relatively small.

Estimated costs were applied to the typology assessments, providing per-dwelling cost evidence which is an important input to the Council's policy evaluation as it shows how the additional BNG burden is likely to be distributed across typologies. The cost evidence indicates that a 15% BNG threshold represents a relatively modest cost uplift above the statutory 10% baseline across the typologies tested. An increase to 20% is more sensitive for medium and particularly for small greenfield sites because it increases reliance on off-site biodiversity unit purchase, while the additional cost remains marginal for large greenfield sites because this typology can deliver a 20% uplift on-site, avoiding offsetting costs. A 25%

requirement would involve additional costs for all typologies and would be more difficult to support as a district-wide threshold on the current evidence.

An assessment of off-site biodiversity unit supply identified a theoretical in-district supply position from seven current candidate parcels assessed, supported by a registered habitat bank and adjoining-area provision. The off-site supply is sufficient to support the modelled 15% requirement, while a 20% requirement would depend on confidence in candidate parcel delivery, with some additional habitat bank capacity or adjoining-area supply; this may be met by further habitat bank capacity developing over the Local Plan period in response to increased market confidence if the Council chooses to pursue the 20% BNG ambition.

The assessment also identified a potential opportunity for the Council to play a more active role in supporting local BNG delivery. The indicative analysis suggests that habitat bank provision could provide a commercially viable mechanism for increasing the supply of strategically located biodiversity units, helping to support delivery of enhanced BNG requirements whilst directing investment towards Local Nature Recovery Strategy (LNRS) priorities. Further detailed assessment would be required before any Council-led habitat bank initiative could be considered.

A higher BNG requirement has the potential to increase the contribution that development makes towards nature recovery objectives by increasing the quantity of biodiversity units that must be delivered and, consequently, the amount of habitat creation and enhancement secured through the planning process. On this basis, the selected BNG requirement should be considered not only in viability and deliverability terms, but also as a policy tool for increasing the scale and quality of nature-positive outcomes across Wealden District.

The East Sussex and Brighton & Hove LNRS identifies a range of priorities relating to habitat creation, enhancement, ecological connectivity and landscape-scale restoration. Whilst this study does not directly quantify delivery of specific LNRS measures under the 15%, 20% and 25% scenarios, higher thresholds increase the opportunity for habitat creation and enhancement to be directed towards LNRS priorities through application of strategic significance, the Biodiversity Gain Hierarchy and associated policy guidance. The extent to which these benefits are realised will depend on policy-led targeting of LNRS priority locations and habitat types and on long-term BNG delivery implementation, rather than the threshold alone.

Whichever threshold is selected by the Council, policy effectiveness will depend on clear guidance around BNG strategic significance, alignment with the LNRS, Biodiversity Gain Hierarchy, legal securing and long-term monitoring.

Overall, the evidence of this study supports a differentiated approach to BNG policy. The assessment demonstrates that a 15% BNG requirement is justified and deliverable across the development typologies assessed, with sufficient modelled off-site biodiversity unit supply and proportionate cost impacts. The evidence also indicates that larger strategic allocations have greater capacity to deliver enhanced BNG requirements, with the medium and large greenfield typologies capable of supporting a 20% BNG requirement through a combination of on-site delivery and limited off-site provision. By contrast, smaller and more constrained development typologies show greater reliance on off-site biodiversity units and proportionately higher costs. For allocated sites, the evidence therefore supports a policy approach that applies a 15% BNG requirement as the district-wide baseline, alongside a targeted 20% requirement for larger strategic allocations of 100 dwellings or more, where the evidence indicates stronger delivery capacity and lower proportional viability impacts. A district-wide 25% requirement is not supported by the current evidence base. These outcomes are based on BNG impacts alone; full viability analysis will take this into account alongside other considerations.

1. Introduction

1.1 Background to the Study

- 1.1.1 As the environmental impact of development on the natural world is becoming ever more apparent, the UK Government has made a number of commitments to reverse the decline of biodiversity, particularly through the 25-Year Plan (Defra, 2018), the National Planning Policy Framework (NPPF) (MHCLG, 2021 as updated) principles for sustainable development and the Environment Act 2021 (Defra, 2021). Many authorities across the UK are declaring ecological and climate emergencies and introducing policies to mitigate developments' impact on the environment, including Wealden District Council in 2025.
- 1.1.2 While the Environment Act sets out the framework for requiring development proposals to deliver a minimum 10% Biodiversity Net Gain (BNG), many Local Planning Authorities (LPAs), such as Guildford, Brighton and Hove and Worthing are implementing higher minimum requirements to address the challenges of balancing unprecedented demand for development with the need to protect and restore the natural environment, both for its intrinsic value and for the ecosystem services it provides.
- 1.1.3 Ramboll was engaged by Wealden District Council (the Council) to provide a robust and fully justified evidence base to support the development of policy within the draft Wealden Local Plan with regards to biodiversity and BNG. To support this, the feasibility of delivering the requirements of draft policy NE2, namely setting a higher BNG requirement in comparison to the national mandatory 10%, was assessed. This included evaluation of off-site biodiversity unit supply availability in the District and in the context of neighbouring LPAs. The costs of BNG delivery were estimated, to inform a viability assessment (which is not within the scope of this brief).
- 1.1.4 The following are the key objectives of the study:
- a) To set out the context for the proposal of a higher minimum BNG threshold than the nationally mandatory threshold of 10% in Wealden District, providing evidence to enable the Council to determine whether a higher threshold is justified.
 - b) To determine, through assessment and habitat mapping, the pre-development biodiversity baseline of the potential / proposed development sites within the spatial strategy, as well as a number of potential development sites within the district.

- c) Having established the pre-development biodiversity baseline in terms of biodiversity units, to then assess and determine the post-development biodiversity value of the sites and confirm whether they provide a net gain in biodiversity units for each of the broad habitat types present.
- d) To apply these analyses to assess the feasibility of achieving the following BNG thresholds in respect of the sites: 10% 15% 20% and 25%.
- e) Determine and compare the biodiversity units which would be required for a proposed development to reach the tested BNG thresholds, to establish the percentage BNG which can be achieved on-site and, if required, the shortfall to be met by offsetting (off-site provision)
- f) Provide an assessment of any key issues or difficulties that the delivery of the BNG thresholds may generate.
- g) Set out what the benefits for nature will be for the district by seeking 15%, 20% or 25% BNG requirements.
- h) Calculate, present, and explain the costs of delivering the various percentage thresholds across the site typologies, including on-site and off-site provision, against the costs of delivering the mandatory 10% threshold.
- i) Evaluate the availability and feasibility of land outside of potential development allocations to deliver biodiversity units that could be used to offset losses or shortfalls in delivery of BNG on-site, including likely costs categorised by habitat type and broken down into capital costs, maintenance costs and management and monitoring costs.
- j) Provide key conclusions and policy considerations for BNG which can be drawn from the worked examples regarding the delivery of BNG through development and on-site and off-site BNG provision in the district.

2. Methodology

2.1 Assessment Process

- 2.1.1 This assessment has been undertaken in line with a pre-determined set of tasks aligned with the objectives described in Section 2.

2.2 Policy and Context Review

- 2.2.1 In order to understand the background policy and local strategy context, a review of relevant information was undertaken. This included publicly available documents and information provided by Wealden District Council, including:

- Wealden Draft Local Plan – Regulation 18 (March 2024) and Focused Regulation 18 (February 2026)
- Land Availability Assessment including call for sites (closed 30th April 2026)
- Wealden Local Housing Needs Assessment
- Wealden Local Plan Viability Assessment and CIL review (2026)
- Wealden Green Infrastructure Study (May 2017)
- Defra consultation on BNG regulations and BNG and Local Nature Recovery Strategy Impact Assessment (Defra, 2019);
- The Government’s National Planning Policy Framework (NPPF) (MHCLG, 2024), updated August 2026, and Planning Practice Guidance (PPG) on the Natural Environment (MHCLG & DLUHC, 2019a). and Viability (MHCLG & DLUHC, 2019b);
- Viability Assessment of Biodiversity Net Gain in Kent (co-authored by Temple (now Ramboll)) (KCC, 2022).
- Biodiversity Net Gain Thresholds, Site Assessment Study and Green Call for Sites, Horsham District Council (Temple (now Ramboll)) 2023
- East Sussex and Brighton and Hove Local Nature Recovery Strategy (published June 2026)¹

2.3 Local Plan Typologies: Typologies and Site Selection

- 2.3.1 Wealden District Council provided a list of 225 sites included in the draft Local Plan, for consideration in this study, along with mapping of sites and baseline information where this was available. A map of all local sites is appended as a separate map book.
- 2.3.2 In order to representatively assess potential sites in the Local Plan and potential windfall sites (pieces of land that become available unexpectedly instead of being

¹ Available at [Publications | Sussex Nature Recovery](#)

considered in the council's development plan), a typology approach has been adopted; sites were stratified into typologies based on factors such as size, development type, development density and existing landscape type (e.g. greenfield or previously developed land) in accordance with the national Planning Practice Guidance on viability assessment (MHCLG & DLUHC, 2019b). The sites were grouped into the following typologies:

- Small greenfield (under 100 units, 10ha)
- Medium greenfield (100-499 units, 50ha)
- Large greenfield (500-5000 units, 100ha), and
- Small industrial (0.25ha).

2.3.3 Three sites were selected that represented each of the small, medium and large greenfield site typologies and one site to represent the small industrial typology. These sites were selected on the basis of the level of available information and being representative of the range of expected developments coming forward within the district.

2.3.4 In addition to these site typologies, consideration was given to potential windfall sites. Most windfall sites would be covered by the typologies identified above, with the exception of brownfield developments. Therefore, an indicative windfall site typology was established:

- Medium brownfield (windfall) – assumed to be existing built environment with a total site area of 10ha, 95% developed for residential houses and flats.

2.3.5 Table 2.1 shows the typologies used for this study.

Table 2.1: Development typologies

Typology	Number of units (max)	Land type	Predominant unit type	Gross to Net	Site size (ha)
Large greenfield	500-5000	Greenfield	Houses	50%	100
Medium greenfield	100-499	Greenfield	Houses	70%	50
Small greenfield	Under 100	Greenfield	Houses	85%	10

Typology	Number of units (max)	Land type	Predominant unit type	Gross to Net	Site size (ha)
Medium brownfield (windfall)	Under 100	Brownfield	Flats and Houses	95%	10
Industrial (employment)	Small	Greenfield	Offices	40%	0.25

2.4 Habitat Characterisation and Classification

- 2.4.1 For each typology to be studied, reasonable assumptions were made regarding habitats found on-site prior to development, and realistic habitats that could / would be created on-site, and to what extent, post-development.
- 2.4.2 The characterisation of baseline (existing) habitats was informed by a review of available mapping including Magic and Natural England (NE) Living England map, information on habitats and designated sites available from the Local Plan and information in planning applications available within the district (e.g. ecological survey data, proposed masterplan, BNG assessments), as well as previous project experience (including Temple’s work for Kent County Council: KCC, 2022). A best estimate of habitat type was made. Baseline habitats were assumed to be mainly those of lower biodiversity value, assuming site selection and optioneering will scope out development on Habitats of Principal Importance, designated sites or other ecologically important features. A ‘moderate’ habitat condition assessment was applied in the absence of detailed condition assessment data.
- 2.4.3 To validate these habitat characterisations, a ground-truthing walkover survey was undertaken of three sites representative of large, medium and small greenfield allocations. This was carried out in the optimal time of year by a qualified ecologist with suitable botanical skills to identify broad habitat types classified using the Living England habitat map. A full habitat condition assessment was not conducted, with an estimation of condition made. The survey validated the approach of the desk study to enable confidence in applying the desk-based habitat mapping assumptions to the remaining typology sites.
- 2.4.4 Habitats were classified using the classification system in the Defra (Natural England) Statutory Metric v1.0.4 (Defra, 2024) (“the Metric”). Table 2.2 shows the site characterisations and corresponding habitat classifications applied.

Table 2.2: Baseline Habitat Characterisation and Classification

Habitat classification	Site characterisation
Greenfield baselines	
Cropland – Non-cereal crops	Arable farmland
Grassland – Modified	Grazed pasture/silage crop
Grassland – Other neutral	Field margins and managed areas for wildlife
Woodland and forest – Other woodland; mixed	Managed woodland within farm ownership
Heathland and shrub - Mixed Scrub	Mix of bramble, hawthorn and blackthorn at woodland and unmanaged edges
Urban – Developed land; sealed surface	Buildings and hardstanding
Lakes – Ponds (non-priority habitat)	Existing ponds
Urban – Bare ground	Vehicle turning and storage areas
Brownfield (windfall) baseline	
Urban – Developed land; sealed surface	Existing buildings and hardstanding
Heathland and shrub - Mixed Scrub	Encroaching scrub from site margins
Urban – Introduced shrub	Previous landscape planting
Urban – Artificial unvegetated, unsealed surface	Broken hardstanding
Grassland – modified grassland	Previous amenity grassland
Urban – vacant or derelict land	Vehicle turning and storage areas
Sparsely vegetated land - Ruderal/ephemeral	Ephemeral vegetation over broken ground
Small industrial baseline	
Urban – developed land sealed surface	Existing buildings and hard standing
Urban – Vacant or derelict land	Bare ground

Habitat classification	Site characterisation
Urban – Artificial unvegetated, unsealed surface	Broken hardstanding
Sparsely vegetated land - Ruderal/ephemeral	Ruderal vegetation such as nettles on broken hard standing
Heathland and shrub - Mixed Scrub	Encroaching scrub from site margins, such as bramble and blackthorn

2.5 Development of enhancement scenarios

- 2.5.1 Likely post-development habitats were selected on the basis of site relevance in terms of pre-development habitats and practicality for a developer to establish them on-site.
- 2.5.2 For each typology likely post development scenarios were created, based on professional judgement, validated using information gathered from a review of other planning application metrics submitted on the Wealden District Council planning portal and other planning application BNG assessments supported by Ramboll within the same area. See Appendix E for a list of reviewed planning applications.
- 2.5.3 Likely best, reasonable and worst-case post-development scenarios were modelled. The 'Best case' outcome was based on the maximum possible habitat change on-site. A 'Reasonable case' outcome was based on what would be expected to be delivered on a typical development and worst was the scenario with the greatest loss of habitat on-site. Table 2.3 provides rationalisations for the best, reasonable and worst-case scenarios.

Table 2.3: Enhancement scenarios

Enhancement scenario	On-site likely target change/ rationalization
Worst case	Conservative outcome where developers are constrained by space / design to retain habitats on-site and enhancement is often not possible within the site boundary. This will result in more units being required for off-site purchase.

Enhancement scenario	On-site likely target change/ rationalization
Reasonable case	Most likely habitat provision. Aiming to provide simple enhancements where space / design allows and creation using moderate distinctiveness habitats aiming for moderate or good condition with a small improvement from baseline. Will provide some additional biodiversity value but nothing significantly above and beyond what is needed. Most developments will fall within this category.
Best case	Upper end of what could reasonably be achieved through higher-ambition restoration. Rare developments that are looking to provide excellent additional biodiversity value by enhancing difficult habitats such as woodland and creating habitats of high distinctiveness and condition. These will require higher resource inputs for implementation and long-term maintenance. These are more easily achieved on larger sites where space is not a constraint to development.

2.5.4 In modelling the post-development makeup of the sites, it was assumed across all typologies that the mitigation hierarchy would be applied to the design of schemes. The mitigation hierarchy is a BNG best practice principle that guides developers to preferentially avoid, then if not, mitigate, restore and finally offset or, failing that, compensate for impacts. This helps to ensure that features of ecological value are retained and development primarily affects habitats of lower biodiversity value.

2.5.5 Post-development modelling took account of typical site parameters such as net to gross ratios, infrastructure requirements and locally relevant strategic and policy considerations (e.g. green networks and priority habitat types). Site boundaries were based on information provided by Wealden District Council (WDC, 2026).

2.6 Calculation of Biodiversity Net Gain

Baseline biodiversity calculation

2.6.1 The habitat information was used to calculate baseline biodiversity unit values for each typology using the Metric, which multiplies the area of a habitat by set factors representing:

- distinctiveness – the rarity and importance of the habitat to biodiversity (automatically determined by the habitat type);

- condition – the quality of a habitat at a point in time based on management, disturbance and other environmental factors (reported on scale of high, moderate and low); and
- strategic significance – whether the location of the habitat falls inside an area formally identified/designated as a priority in local environmental strategies.

Post-development biodiversity calculation

- 2.6.2 Post-development habitats were entered to the post-development section of the Metric. This evaluates proposed habitats in the same way as baseline habitats but also applies risk multipliers (less than 1) to represent the “time to achieve target condition” and the “difficulty of creation or enhancement”.
- 2.6.3 A strategic significance multiplier in the Metric is based on whether a site falls within an area formally identified as a priority in the LNRS and this multiplier was applied in line with the Statutory Biodiversity Metric User Guide. Where a published LNRS and Local Habitat Map are in place, high strategic significance is only appropriate where the post-development habitat parcel is within a mapped area where a potential measure has been proposed to help deliver LNRS priorities, and where the proposed habitat intervention is consistent with that mapped measure. Where these criteria were not met, low strategic significance was assigned. Baseline habitats were automatically assigned low strategic significance, as per the guidelines.
- 2.6.4 Comparison of the baseline and post-development biodiversity unit Metric scores provided an upper limit of net gain that was considered feasible and achievable on-site without altering the development parameters.

Threshold testing

- 2.6.5 To support viability testing at different potential target levels of net gain in planning policy requirements, BNG performance was tested for each typology and compared against BNG thresholds of 10%, 15%, 20% and 25%.
- 2.6.6 The number of additional off-site biodiversity units required to achieve each threshold level was calculated, where it was not reasonably achievable on-site (see Table 3.2).

2.7 Off-site Supply

Off-site supply assessment

- 2.7.1 The off-site supply assessment considered the likely availability and deliverability of biodiversity units within Wealden District. The assessment focused on seven candidate off-site parcels provided by Wealden District Council, relevant registered habitat banks and potential cross-boundary delivery options as sources of off-site biodiversity units. Its purpose was to test whether a sufficient supply of sites could support the enhanced BNG thresholds considered elsewhere in the study and to identify any habitat-specific constraints that may affect delivery.
- 2.7.2 The assessment also included a targeted review of registered and market-facing habitat bank provision within Wealden District, adjoining authorities and the wider market in South East England. The review considered publicly available information from the Biodiversity Gain Site Register, provider websites and market-facing habitat bank listings to identify named in-district provision, adjoining-area opportunities and wider provider networks that could supplement the candidate parcels. The review was used to understand the resilience of the wider off-site supply market; it was not treated as a confirmed availability check because unit availability is dynamic and depends on allocation status, prior sales, habitat type, legal securing mechanism, location and commercial terms.
- 2.7.3 The assessment considered opportunities for cross-boundary delivery of BNG through review of biodiversity gain sites, habitat banks, LNRS priorities and wider nature recovery initiatives within neighbouring local authority areas and the South Downs National Park. Consideration was given to whether these opportunities could support landscape-scale ecological connectivity, river catchment restoration and habitat networks extending beyond the administrative boundary of Wealden District. This included consideration of the South Downs National Park Authority (SDNPA) ReNature programme as an example of a potential cross-boundary biodiversity unit delivery mechanism, where biodiversity units generated within the National Park or associated habitat banks may be capable of supporting mandatory BNG requirements arising from development in neighbouring authority areas, subject to the Biodiversity Gain Hierarchy, spatial risk requirements, strategic significance criteria, legal securing and unit availability.

Off-site enhancement scenarios

- 2.7.4 Three enhancement cases were developed for each candidate off-site parcel to provide a transparent range of potential BNG outcomes. The cases were designed to test different levels of ecological uplift by varying the degree of habitat condition

improvement and, where ecologically realistic, habitat distinctiveness change achieved. This provided a consistent basis for evaluating conservative (worst case), likely (reasonable case) and more ambitious (best case) scenario enhancement assumptions across the candidate off-site parcels, as summarised in Table 2.4. This process was developed independently of the scenario-development approach applied for the typology sites, because the objectives and decision parameters underpinning on-site and off-site habitat provision are not directly comparable. The assessment was informed by baseline information prepared digitally, including assigning UK Habitat Classification mapping using aerial imagery and creating associated Metric sheets. These datasets were reviewed to establish baseline habitat composition, condition and biodiversity unit values and provided the starting point for the enhancement modelling undertaken.

Table 2.4: Enhancement case assumptions used in the off-site BNG modelling

Scenario	Condition change assumed	Distinctiveness change assumed	Purpose / interpretation
Worst	One condition class improvement, for example poor to moderate or moderate to good.	No distinctiveness change.	Conservative outcome where management improves habitat quality but does not materially change habitat type or ecological character.
Reasonable	One condition class improvement.	One distinctiveness class improvement, where supported by baseline habitat type, site characteristics and appropriate management.	Principal assessment case representing a realistic enhancement trajectory where habitat management improves both habitat quality and ecological value.

Scenario	Condition change assumed	Distinctiveness change assumed	Purpose / interpretation
Best	Up to two condition class improvements, where considered realistic, deliverable and maintainable.	Up to two distinctiveness class improvements, where considered ecologically realistic and achievable.	Upper end of what could reasonably be achieved through higher-intensity restoration and long-term management, while remaining grounded in the limitations of the existing habitat resource.

- 2.7.5 The scenario enhancement assumptions were developed through review of the baseline habitat resource, habitat suitability, site constraints, landscape context and professional experience of habitat restoration and management. The resulting assumptions were then entered to the Metric to quantify the biodiversity unit uplift generated.
- 2.7.6 Enhancement assumptions were not applied to habitats that were already of high distinctiveness, as defined by the Metric, or that are difficult to improve within the Metric 'time to target condition' rules. High-distinctiveness habitats were not assumed to receive further condition uplift, and habitats such as woodland were not modelled for enhancement where a reliable improvement in condition or distinctiveness could not be demonstrated within the set timeframes. This avoided overstating potential biodiversity unit gains from habitats where ecological enhancement is uncertain, slow to realise, or less controllable through standard management interventions.
- 2.7.7 Two off-site supply models were developed in order to understand viability and deliverability of the policy.
- 2.7.8 Off-site Model 1 was developed as the primary supply assessment scenario and represents a realistic delivery approach. As described above, existing habitats within each candidate parcel were reviewed and enhancement measures were identified that could reasonably improve habitat condition or biodiversity value while remaining broadly consistent with the existing habitat resource and site characteristics. This was intended to estimate likely off-site supply and therefore

forms the primary evidence base for assessing district-wide supply capacity, habitat scarcity risks and potential policy implications.

- 2.7.9 Off-site Model 2 was developed as an additional option test and should not be interpreted as a preferred, or best-case delivery scenario. Its purpose was to explore whether the largest candidate parcels could deliver a broader range of habitat types where the on-site BNG demand modelling identified a need for habitats that were under-represented in the Off-site Model 1 outputs. Off-site Model 2 was not designed to maximise total biodiversity unit generation, but to test the extent to which habitat diversity could be increased to address habitat-specific demand or LNRS-led strategic significance objectives.
- 2.7.10 Off-site Model 2 was applied to the larger candidate parcels, above 20ha (GSLA 9, GSLA 12, GSLA 23 and GSLA 77). This threshold was used because parcels of this scale provided sufficient land to retain the principal grassland enhancement measures identified in Off-site Model 1 while also testing a meaningful habitat diversification option. The working assumption was that approximately 80% of the available resource would be managed through Off-site Model 1 enhancement measures, with the remaining 20% directed towards habitat creation comprising a small allowance for ponds of 0.06ha per large site, with the remaining created area split approximately 75% mixed scrub and 25% mixed woodland.
- 2.7.11 Off-site Model 2 modifies the modelling approach for the larger parcels only. The smaller parcels (GSLA 2, GSLA 30 and GSLA 32), are included without modifying Off-site Model 1. This allows Off-site Model 2 to be compared with Off-site Model 1 as a district-wide supply case, rather than as a separate four-site test.
- 2.7.12 For each Model, worst, reasonable and best-case habitat enhancement scenarios were applied to reflect uncertainty in site suitability, habitat condition, management success and deliverability. The resulting biodiversity unit uplift was calculated using the Metric.
- 2.7.13 The outputs from both Models were compared against the modelled off-site demand identified through the on-site BNG threshold analysis, by applying the typology assessment to all sites in the Local Plan (as provided by the Council), to determine a potential demand total. This comparison was used to identify any shortfall in biodiversity units available to meet projected offsetting requirements, though it should be noted that it represents an 'all-at-once' demand scenario whereby all development sites simultaneously require off-site supply, which in reality would not be expected.

2.8 On-site and Off-site Delivery Costs

- 2.8.1 The cost assessment was developed to provide an estimate of the cost of delivering BNG through both on-site habitat creation and enhancement within the representative development typologies, and off-site habitat creation and enhancement within the candidate supply parcels. The costs were not intended to represent detailed delivery budgets, but to provide a reasoned evidence base for comparing the relative cost implications of different habitat interventions, BNG thresholds and delivery scenarios, and for informing the wider viability and policy assessment.
- 2.8.2 Modelled habitat interventions were costed by applying component cost assumptions to the area of habitat for creation or enhancement. The principal component intervention types and cost assumptions are shown in Appendix B and were used in both on-site and off-site analysis. This ensured that on-site delivery costs and off-site supply costs were derived on a consistent basis and could be compared alongside the biodiversity unit outputs generated through the Metric.
- 2.8.3 Economy of scale discounts and small-site uplifts were applied to the costs to reflect likely rate differentiations. Although the same underlying habitat intervention (capital) cost rates were used for all sites, differing scale adjustments were used to reflect different on-site and off-site delivery contexts.
- 2.8.4 On-site habitat measures are delivered as part of a development, where ecological works typically occupy a small proportion of the site, often fragmented into multiple parcels associated with open space, drainage features and buffers. Consequently, the habitat area is substantially smaller than in off-site situations, which tend to have a higher proportion of the site under management, and equivalent economies of scale in habitat delivery costs are not expected in on-site cases.
- 2.8.5 Small site typologies resulted in low generated costs based purely on site size alone, that would not reflect minimum contractor mobilisation or working practices. An uplift of 25% was applied due to inefficiencies with working on small sites, plus a fixed £1,500 fee to cover costs to mobilise. This adjustment was not applied to the off-site assessment because the smallest off-site parcels were modelled as standalone land management projects with costs already expressed on an area basis considered to represent realistic minimum delivery costs. These adjustments are based on professional judgment and experience and intended only to be indicative.
- 2.8.6 The on-site economy of scale adjustments are shown in Table 2.5.

Table 2.5: On-site economy-of-scale cost adjustment assumptions

Area threshold (ha)	Discount	Cost multiplier	Rationale
100 (large)	15%	85%	Upper scale benefits
50 (medium)	0%	100%	No reduction
10 (small)	0%	125%	25% small-site uplift for reduced efficiency with an additional fixed £1,500 mobilisation allowance

2.8.7 The off-site economy of scale adjustments are shown in Table 2.6.

Table 2.6: Off-site economy of scale cost adjustment assumptions

Area threshold (ha)	Discount	Cost multiplier	Rationale
50	25%	75%	Upper cap to avoid over-discounting
30	20%	80%	Larger mobilisation efficiency
20	15%	85%	Further scale benefit
10	10%	90%	First operational saving
0	0%	100%	No reduction below 10ha

2.8.8 The costs include estimated habitat management costs over the 30 years required for BNG (not adjusted for inflation, in line with usual practice for viability assessments to use current prices to establish costs). Long-term management costs were based on annual habitat maintenance throughout the 30-year period. Monitoring costs were included at Years 1, 2, 3, 5, 10, 15, 20 and 30, reflecting a typical monitoring and reporting schedule used to demonstrate compliance with BNG obligations and Habitat Management and Monitoring Plans.

2.8.9 The costings used upper-level figures from expected delivery cost ranges for specific management and maintenance interventions, to avoid under-valuing long-term costs, which are particularly difficult to standardise across such a broad range of activities as covered in this study. Considering this, no explicit contingency allowance was applied for adaptive management or unforeseen circumstances, in the development of costs.

- 2.8.10 The cost estimates were derived from a combination of real-life examples from recent contractor quotes from the region, benchmark cost data from the SPON's Price Book (AECOM 2026), and internal cost data provided by Ramboll landscape specialists from comparable habitat creation and enhancement projects. This provided a pragmatic evidence base that reflects both current market pricing and published industry cost benchmarks.
- 2.8.11 Where off-site biodiversity units were required, it was assumed that these would be purchased from market biodiversity unit sources and no additional land would be purchased.
- 2.8.12 Based on typical post-development habitats, it was estimated that the off-site biodiversity units expected to be required comprise predominantly other neutral grassland units and a smaller number of mixed scrub units. Based on a review of publicly available information (BNG Pricing Report, July 2026), (The Ferals, August 2026) a representative price of £27,522 per unit was applied throughout the assessment. This value falls within the range of market prices identified for the principal habitat types expected.
- 2.8.13 The principal intervention types and cost assumptions used to compile the on-site and off-site habitat creation and enhancement cost estimates are summarised in Appendix B.
- 2.8.14 To support consideration of the potential commercial viability of off-site biodiversity unit delivery for off-site suppliers, an indicative residual value was calculated for each off-site supply scenario. This was derived by subtracting the modelled habitat creation, enhancement, management and monitoring costs from the estimated gross value of biodiversity units generated, using the BNG Pricing Report (July 2026).

2.9 Validation and policy considerations

- 2.9.1 The validation and policy consideration assessment brought together the evidence generated through the preceding workstreams. The methodology followed a traceable chain from local biodiversity evidence, LNRS priorities, development typology testing, BNG demand modelling, cost evidence and off-site supply assessment through to policy options and implementation considerations for Wealden District Council.
- 2.9.2 The validation process included a specific nature recovery justification test for the 15%, 20% and 25% threshold options. This considered whether each threshold would materially increase the quantum of habitat creation or enhancement secured

through development, whether the additional requirement could help deliver LNRS priorities or mapped measures, whether there was evidence from other local planning authorities or strategic partnerships to support the threshold, and whether the resulting delivery burden remained proportionate when assessed alongside typology costs and off-site supply confidence.

- 2.9.3 A workshop was held to incorporate the knowledge and feedback of key strategic partners and stakeholders in Wealden District, to ensure a robust evidence position for the study and support policy considerations. Attendees included East and West Sussex country ecologists, Natural England, The Sussex Wildlife Trust and Wealden District Council. The discussion was to review the emerging evidence base for enhanced BNG requirements. Discussions focused on the deliverability of 15%, 20% and 25% BNG thresholds, the availability of on-site and off-site habitat provision, alignment with the LNRS, habitat bank capacity, viability considerations and policy implementation.
- 2.9.4 Validation considered whether an enhanced BNG target above the statutory 10% minimum could be justified, and whether a single district-wide target or a differentiated approach by development typology and LNRS alignment would be more robust.
- 2.9.5 The scope of works identified Biodiversity Opportunity Areas (BOAs) as a potential mechanism for applying differential BNG thresholds. However, the publication of the East Sussex and Brighton & Hove LNRS and associated Local Habitat Map provides a more current and policy-relevant framework for identifying strategic habitat opportunities. As strategic significance within the Metric is now linked to LNRS mapped measures and Local Habitat Map areas, the study has focused on LNRS-led approaches rather than BOAs when considering how enhanced BNG requirements may support nature recovery objectives.
- 2.9.6 The resulting policy considerations address deliverability, strategic significance, cross-boundary options, the limitations of relying on BNG alone to achieve nature objectives, and the need for complementary guidance where wider nature recovery priorities require additional mechanisms.

2.10 Nature recovery and enhanced BNG threshold review

- 2.10.1 In addition to testing the physical deliverability and cost implications of alternative BNG thresholds, the study reviewed the extent to which enhanced BNG requirements could contribute towards nature recovery objectives in Wealden District.

- 2.10.2 The review focussed on the LNRS, priorities and mapped measures relevant to habitat creation, habitat enhancement, ecological connectivity and landscape-scale restoration. Attention was given to how BNG delivery could support strategic habitat priorities where post-development or off-site habitats are located within mapped areas and are consistent with identified LNRS measures.
- 2.10.3 The assessment also considered the South Downs National Park Authority ReNature approach in the context of the District's biodiversity challenges and strategic ambitions. ReNature was reviewed as an example of landscape-scale habitat restoration and ecological connectivity that could inform the nature recovery rationale for enhanced BNG thresholds, alongside evidence from other local planning authorities and strategic partnerships that have adopted, proposed or promoted requirements above the statutory minimum.
- 2.10.4 Evidence from other local planning authorities and strategic environmental partnerships was reviewed to understand the extent to which higher BNG targets have been adopted, proposed or promoted elsewhere, and the rationale used to support those positions. This included consideration of authorities that have adopted enhanced requirements, authorities preparing supplementary planning guidance, and partnership-led approaches such as Local Nature Partnerships promoting consistent ambitions across wider geographies.
- 2.10.5 The findings from the LNRS, ReNature and other initiatives were used alongside the typology assessment, off-site supply assessment and cost analysis to inform the judgement on whether enhanced thresholds are justified, proportionate and capable of contributing to nature recovery objectives.

2.11 Assumptions and limitations

- 2.11.1 Hedgerows and watercourses are treated as independent types of biodiversity units by the BNG framework and developments must account for them separately to area-based habitats, achieving the minimum 10% net gain in all three types, where present. They were not assessed in this study. Hedgerows are generally abundant in the district, comparatively straightforward to deliver within development sites and not a general constraint on BNG delivery at the strategic scale considered in this study. The assessment assumes that watercourses would typically be retained within undeveloped buffers or open space and would not constitute a material constraint to achieving BNG requirements; furthermore, they had limited occurrence in the representative sample sites. Should site-specific designs result in unavoidable impacts to hedgerows or watercourses, additional measures and associated costs would arise to meet existing statutory BNG requirements that are not captured within this assessment.

- 2.11.2 No allocated sites used in this study were in the High Weald Area of Natural Beauty (AONB). If allocation sites come forward in future in this area, the biodiversity units required will potentially be for higher distinctiveness habitats and therefore of a higher per unit cost and this may have an impact on overall costs.
- 2.11.3 Brownfield sites were assumed to be mainly bare ground with little vegetation. This was to differentiate them as much as possible from the greenfield site typologies, thus they had relatively low pre-development biodiversity units. In reality, if sites become re-vegetated through lack of disturbance, they can be more akin to a greenfield site in terms of pre-development habitats and biodiversity units. Additionally, there is a potential for some brownfield sites to have ‘open mosaic habitats’ of high ecological value. These types of sites have been excluded from this study as they are highly variable and would generally be avoided for development where possible. Wealden District does not currently have any allocated sites which are on previously developed land.
- 2.11.4 Greenfield sites can potentially have considerably higher diversity of habitats than assumed for this study. The greenfield sites in these typologies were assumed to be mostly arable farmland, but future allocation sites could contain habitats of much higher value, including habitats of principal importance. However, as these are rarely the sites chosen for development, it is likely that the habitat choices within this study reflect the real-world value for most sites in these typologies.
- 2.11.5 The off-site supply assessment was based on the candidate parcels, register-derived habitat bank information and cost assumptions available at the time. It provides evidence of wider market capacity but should not be treated as confirmed supply. It cannot be guaranteed that all identified potential supply will be delivered, or indeed limited to these sites in the future, as additional green sites, future habitat banks or other landowner-led opportunities may emerge over the Local Plan period. Similarly, the modelled off-site demand was based on extrapolation of typology scenarios across all sites in the Local Plan and therefore is an absolute figure that does not reflect the staggered demand that would in reality materialise. The results should therefore be interpreted only as a strategic evidence base for policy testing.
- 2.11.6 Baseline habitat mapping, condition assumptions and enhancement potential were assessed using available data and professional judgement and are not intended as accurate site assessments. Similarly, the cost estimates are indicative and used to support strategic comparison and policy testing and are not substitutes for site-specific cost planning or procurement-stage pricing.

- 2.11.7 The cost assessment was based on present-day market rates and cost data available at the time of the study. While 30-year management and monitoring costs were included, these were not adjusted for potential inflation over the assumed 30-year management period, in line with usual practice for viability assessments to use current prices to establish costs.
- 2.11.8 Biodiversity unit purchase costs were based on those habitats expected to be required to replace baseline habitats. If different habitats are required, some may significantly exceed the blended biodiversity unit cost used in this assessment and could increase costs for delivery.
- 2.11.9 BNG results in submitted planning documents or values used to inform the emerging Local Plan evidence may be out-dated in some cases where they were calculated using earlier versions of the Metric, due to differences in the habitat value calculations.
- 2.11.10 The off-site enhancement scenarios modelled were intended to provide a consistent range of plausible outcomes rather than a prediction of final habitat performance. Off-site Model 2 is an options test for habitat diversification and should not be interpreted as a preferred delivery scheme or as an optimisation of unit yield or financial return.
- 2.11.11 Indicative residual value is gross biodiversity unit value less modelled habitat creation / enhancement costs with the economy-of-scale adjustment applied. It should not be interpreted as provider profit and does not include wider project costs, land opportunity cost, finance, tax, contingency, sales risk or provider return.
- 2.11.12 Stakeholder feedback during the study highlighted that available mapped datasets may under-record lowland meadow and related species-rich grassland habitats. Given its focus on typical development scenarios which primarily avoid impacts to high or very high distinctiveness habitats, including lowland meadow, the study did not include these habitat types in the assessment; the only habitat that would be awarded higher strategic significance in the typology post-development scenarios was woodland, which was retained and so did not impact biodiversity unit requirements. This is considered to be a relatively low risk to the overall conclusions of the study. However, where development proposals affect a greater proportion of species-rich grassland, woodland or other high-distinctiveness habitats than assumed within the typologies, the biodiversity unit requirements and associated costs could be higher than those presented in this assessment.
- 2.11.13 The assessment does not separately quantify BNG ‘additionality’ requirements arising from the need to exclude protected species mitigation, Suitable Alternative

Natural Greenspace (SANG) provision or other site-specific ecological obligations from BNG calculations beyond no-net-loss. Where land is required for these purposes, it may not be available to deliver BNG uplift. We have assumed in these scenarios that any SANG provision will be used to achieve the no-net loss position within a site and not impact upon site BNG delivery.

3. Results

3.1 Local Plan Typologies

3.1.1 As part of the typology creation a review was undertaken of submitted BNG metrics for current planning applications as well as a review of previous projects undertaken by Ramboll in the local area. This found that the following baseline habitats of medium distinctiveness are those most likely to be found on sites and may need to be provided post-development:

- Other neutral grassland
- Mixed scrub
- Pond (non-priority habitat)
- Individual trees
- Broadleaved woodland

3.1.2 Of these habitats, broadleaved woodland was assumed to be retained on-site, due to the difficulty and higher costs to create woodland or purchase off-site units. The other habitats are those considered most likely to be retained, created or enhanced on-site where possible, or required from off-site supply.

3.1.3 BNG results from the best, reasonable and worst-case post-development scenarios for each typology are presented in Table 3.1.

Table 3.1: Best, reasonable and worst-case scenarios per typology, BNG delivery

Typology	BNG %		
	Best	Reasonable	Worst
Large greenfield	34.92	19.77	10.95
Medium greenfield	13.42	11.18	10.06
Small greenfield	-25.15	-29.06	-29.06
Medium brownfield	8.45	8.45	5.75
Small industrial	22.35	-7.60	-18.48

3.1.4 Whilst best, reasonable and worst-case scenarios were modelled to test the sensitivity of the typologies to differing habitat delivery assumptions, subsequent cost, threshold and policy analyses are based on the reasonable case scenario. This was considered the most representative of likely real-world development outcomes

and therefore provides the most appropriate basis for comparing threshold performance, off-site biodiversity unit demand and policy implications. Full calculations for each scenario are presented in Appendix A.

- 3.1.5 The reasonable BNG scenario calculated for each typology is presented in Table 3.2, showing the number of biodiversity units required in excess of that deliverable on-site, to achieve target levels of net gain of +10%, +15%, +20% and +25%.

Table 3.2: Summary of reasonable scenario BNG compared to minimum 10% target, and additional biodiversity units required to achieve 15%, 20% and 25%.

Typology	Reasonable BNG (%)	Additional biodiversity units needed to achieve BNG thresholds			
		10%	15%	20%	25%
Large greenfield	19.77	0.0	0.0	0.7	16.2
Medium greenfield	11.18	0.0	4.78	11.03	17.28
Small greenfield	-29.06	8.98	10.13	11.28	12.43
Medium brownfield	8.45	0.13	0.57	1.0	1.44
Small industrial	-7.60	0.11	0.14	0.17	0.2

- 3.1.6 Table 3.3 shows the outline cost of delivering the biodiversity units achievable on-site for the reasonable case scenario and the cost of delivering either 10%, 15%, 20% or 25% net gain, including any required purchase of off-site units.

Table 3.3: Summary of costs to deliver reasonable case BNG on-site and total cost to achieve 10%, 15%, 20% and 25% gain including off-site BU purchase where needed

Costs to achieve BNG by threshold, by site and per hectare									
Typology	Cost of reasonable case on-site BNG	10%		15%		20%		25%	
		site	per ha	site	per ha	site	per ha	site	per ha
Large greenfield	£960,407	£792,221	£7,922	£960,407	£9,604	£979,672	£9,796	£1,406,263	£14,063
Medium greenfield	£729,124	£729,124	£14,582	£860,679	£17,214	£1,032,692	£20,654	£1,204,704	£24,094
Small greenfield	£67,653	£314,800	£31,480	£346,450	£34,645	£378,101	£37,810	£409,751	£40,975
Medium brownfield	£2,311	£5,889	£589	£17,999	£1,800	£29,833	£2,983	£41,943	£4,194
Small industrial	£3,278	£6,305	£25,220	£7,131	£28,524	£7,957	£31,828	£8,782	£35,128

- 3.1.7 Table 3.4 and Table 3.5 show the above costs on a per dwelling basis for residential typologies in the reasonable case scenario. Expressing the cost outputs on a per dwelling basis provides a clearer indication of proportionality across the residential typologies. The small industrial (employment) typology is excluded from the per dwelling analysis because it is not a residential typology; it is better considered using absolute cost and cost per hectare.

Table 3.4: Total cost per dwelling by BNG threshold for residential typologies (reasonable case scenario)

Typology	No. residential units	Cost per dwelling, by BNG threshold			
		10%	15%	20%	25%
Large greenfield	5,000	£158	£192	£195	£281
Medium greenfield	500	£1,458	£1,721	£2,065	£2,409
Small greenfield	100	£3,148	£3,464	£3,781	£4,098
Medium brownfield	100	£58	£179	£298	£419

Table 3.5: Additional cost per dwelling above the 10% BNG baseline (reasonable case scenario)

Typology	Per dwelling cost above 10% baseline			
	10%	15%	20%	25%
Large greenfield	£158	+£34	+£37	+£123
Medium greenfield	£1,458	+£263	+£607	+£951
Small greenfield	£3,148	+£316	+£633	+£950
Medium brownfield	£58	+£121	+£240	+£361

- 3.1.8 A useful additional context is to show the per dwelling costs as a percentage of per dwelling construction costs, as presented in Table 3.6. This is based on an average unit size of 99m² and a base construction cost of £1,668 per m², the current median BCIS cost for Estate Housing in Wealden, as advised by consultation with expert viability analysis provider Quintic Advisory LLP.
- 3.1.9 Table 3.6 shows all the percentage of per dwelling construction costs results from best, reasonable and worst-case scenarios, for clarity. Costs generally increase as the BNG threshold rises from 10% to 25%, although the scale of increase varies considerably by typology and scenario. In some circumstances, the worst-case

scenario is more expensive to deliver than the reasonable or best case, at higher BNG thresholds; this is because of the lower delivery of on-site BNG units assumed in worst-case scenarios, where developers were assumed to deliver only basic habitat measures primarily due to site constraints. At higher thresholds, this necessitates greater purchase of units from off-site providers, increasing overall costs. In reality, this effect could be mitigated to some degree if a higher BNG threshold were established, because this could encourage developers to achieve more on-site BNG to reduce offsetting costs, though particularly on smaller sites most affected by the higher costs burden shown in this study, the capacity to achieve more on-site BNG was highly constrained or not possible.

Table 3.6: Per dwelling BNG costs as a percentage of per dwelling construction costs

Typology	No. res. units	Scenario	BNG cost as a % of per dwelling construction costs			
			10%	15%	20%	25%
Large greenfield	5,000	Best	0.10%	0.12%	0.12%	0.17%
		Reasonable	0.10%	0.12%	0.12%	0.17%
		Worst	0.10%	0.14%	0.19%	0.24%
Medium greenfield	500	Best	0.30%	0.69%	0.99%	1.17%
		Reasonable	0.88%	1.04%	1.25%	1.46%
		Worst	0.66%	0.86%	1.07%	1.28%
Small greenfield	100	Best	1.91%	2.10%	2.29%	2.48%
		Reasonable	1.76%	1.95%	2.14%	2.33%
		Worst	1.91%	2.10%	2.29%	2.48%
Medium brownfield	100	Best	0.04%	0.11%	0.18%	0.25%
		Reasonable	0.04%	0.11%	0.18%	0.25%
		Worst	0.06%	0.13%	0.21%	0.28%

3.1.10 The large greenfield typology shows the lowest proportional cost burden, remaining below 0.25% of total per dwelling construction costs even in the worst case, reflecting the benefits of scale and relatively favourable baseline conditions. In contrast, the small greenfield typology shows the highest proportional cost burden across all scenarios, ranging from 1.76–2.48%. The medium greenfield typology sits between these extremes but shows marked variation between scenarios, with the reasonable case producing the highest cost throughout. The medium brownfield (windfall) typology remains comparatively low-cost across all scenarios, although as expected, costs increase steadily with higher BNG targets. Overall, the results indicate that scheme size and typology have a stronger influence on

proportional BNG cost than the scenario alone, with small greenfield schemes most affected and large greenfield schemes least affected.

3.2 Off-site Biodiversity Unit Supply

- 3.2.1 The review identifies a theoretical supply of off-site biodiversity units from the seven Wealden District Council candidate parcels as summarised for 'Off-site Model 1' best, reasonable and worst-case scenarios, in Table 3.7. This shows the primary habitat types provided by each parcel: full details of each parcel are provided in Appendix C.

Table 3.7: Off-site Model 1 off-site biodiversity unit supply

Parcel	Main contributing habitat types	Units available			Summary comment
		Worst case	Reasonable case	Best case	
GSLA 2	Grassland	2.3	5.6	9.6	Small parcel with limited grassland-led uplift across all cases.
GSLA 9	Grassland; heathland and scrub	207.4	219.0	263.5	Largest individual contributor, dominated by grassland enhancement with a small scrub component in the reasonable and best cases.
GSLA 12	Grassland; heathland and scrub; lakes	118.9	134.8	164.2	Major contributor, with grassland forming the main uplift and additional scrub and pond/lake units in higher cases.
GSLA 23	Grassland	117.7	119.9	142.6	Major grassland-led contributor, with a relatively narrow uplift between worst and reasonable cases and

Units available					
Parcel	Main contributing habitat types	Worst case	Reasonable case	Best case	Summary comment
					higher yield in the best case.
GSLA 30	Grassland	7.7	7.7	7.7	Small enhancement-only contribution, with no further uplift between cases.
GSLA 32	Grassland; heathland and scrub	22.3	22.3	22.3	Modest contribution, comprising grassland and a small scrub component.
GSLA 77	Grassland	104.0	112.2	147.5	Major grassland-led contributor, with higher yield under the best case assumptions.
Total	All modelled habitats	580.4	621.6	757.4	Off-site Model 1 supply is dominated by grassland units, with most supply provided by GSLA 9, GSLA 12, GSLA 23 and GSLA 77.

Habitat composition and scarcity

- 3.2.2 The assessed supply is dominated by grassland units. In Off-site Model 1, grassland accounts for between 578 units (worst case) and 742 units (best case). By contrast, mixed scrub contributes only modest supply providing 2 units in the worst case, increasing to 13 units in both the reasonable and best cases, while lakes and ponds contribute no units in the worst or reasonable case and only 2 units in the best case.
- 3.2.3 GSLA 9, GSLA 12, GSLA 23 and GSLA 77 record the highest modelled grassland-led uplift across the assessed cases. GSLA 2, GSLA 30 and GSLA 32 record lower modelled totals by comparison.

Off-site Model 2 and habitat diversification

- 3.2.4 On the four larger parcels, the Off-site Model 2 diversified habitat creation scenario generates 178.8 non-grassland units, comprising ponds, woodland, and mixed scrub, shown in Table 3.8. These habitat creation assumptions are fixed within the model and therefore remain consistent across the worst, reasonable and best cases, though these scenarios differ in total output due to residual grassland enhancement scenarios retained from Off-site Model 1. Full parcel-by-parcel results for Off-site Model 2 are provided in Appendix C.
- 3.2.5 Off-site Model 2 generates approximately 576.8 units in the reasonable case and 687.0 units in the best case, across all habitats. This is lower than the totals delivered by Off-site Model 1, demonstrating the trade-off between greater diversity of habitats provided, and biodiversity unit optimisation. This is due to Metric-driven valuation which tends to favour simpler habitats by applying risk multipliers for delivery of more complex habitat types.

Table 3.8: Off-site Models 1 and 2 biodiversity unit availability (reasonable case)

Diversified (non-grassland) habitat	Off-site Model 1	Off-site Model 2
Ponds	0.0	1.7
Woodland	0.0	21.1
Mixed scrub	13.0	156.0
Total non-grassland units	13.0	178.8
(Total units)	(621.6)	(576.8)

- 3.2.6 Table 3.9 compares the biodiversity unit demand generated by the modelled 10%, 15%, 20% and 25% typology BNG thresholds, applied across all sites in the Local Plan, against the biodiversity unit supply available from the candidate off-site parcels under Off-site Model 1 and Off-site Model 2. The purpose of this comparison is to assess whether the identified in-district candidate parcels could theoretically provide sufficient biodiversity units to support each threshold level and to identify the point at which supply shortfalls emerge. Positive values indicate that candidate parcel supply exceeds the biodiversity unit requirement, while negative values indicate a shortfall requiring additional provision from habitat banks, adjoining-area delivery or wider market sources.

Table 3.9: Off-site candidate parcel supply in biodiversity units (BU) against BNG threshold requirements

BNG threshold	Off-site Model 1			Off-site Model 2			Discussion
	Worst case	Reasonable case	Best case	Worst case	Reasonable case	Best case	
10% 203 BU	+377	+418	+554	+345	+373	+484	Covered across all scenario cases, with substantial margin.
15% 439 BU	+141	+183	+318	+110	+138	+248	Covered across all scenario cases, with reduced but still positive margin.
20% 716 BU	-136	-95	+41	-168	-140	-29	Only Off-site Model 1 best case provides sufficient candidate parcel supply on its own.
25% 1,009 BU	-428	-387	-251	-460	-432	-322	Not covered by candidate parcels alone; requires additional market supply.

- 3.2.7 The results indicate that the identified candidate parcels provide sufficient off-site supply to support the 10% and 15% thresholds under all modelled scenarios. At 20%, supply becomes more finely balanced, with only the Off-site Model 1 best-case scenario providing sufficient candidate parcel supply on its own (although the assumption inherent in the assessment, that all development sites would require biodiversity units simultaneously, is obviously highly unlikely). The 25% threshold results in a significant shortfall across all scenarios, indicating reliance on additional habitat banks, adjoining-area provision or future market-led supply.
- 3.2.8 Transparent presentation of the breakdown of off-site delivery costs will assist the Council to assess other BNG delivery options including a business case for becoming a habitat bank provider. Table 3.10 compares the district-wide delivery costs and approximate returns for Off-site Model 1 and Off-site Model 2, including biodiversity unit yield, gross biodiversity unit value, delivery cost (initial capital and 30-year management and monitoring costs) and indicative residual value. It is useful to illustrate the financial trade-off between maximum biodiversity unit generation (Off-site Model 1) and ensuring an adequate range of diverse habitats to meet demand (Off-site Model 2), as discussed in point 4.2.5.
- 3.2.9 In Table 3.10, indicative residual value is gross biodiversity unit value less modelled creation / enhancement costs with the economy-of-scale adjustment applied. It should not be interpreted as provider profit and does not include wider project costs, land opportunity cost, finance, tax, contingency, sales risk or provider return.
- 3.2.10 Off-site Model 2 includes the smaller parcels as per Off-site Model 1. Therefore, the figures should not be used to infer the financial effect of habitat diversification, *per se*.

Table 3.10: Comparable district-wide Off-site Model 1 and Off-site Model 2 off-site biodiversity unit supply, delivery costs and approximate returns

Model	Approach	Case	Biodiversity units provided	Gross BU value	Cost	Indicative residual value
Off-site Model 1	Enhancement only across all parcels	Worst	580.37	£14.40m	£6.01m	£8.38m
		Reasonable	621.64	£15.45m	£6.74m	£8.71m
		Best	757.40	£18.89m	£10.83m	£8.06m
Off-site Model 2	Large parcels diversified; smaller parcels enhancement only	Worst	548.87	£13.59m	£5.83m	£7.76m
		Reasonable	576.82	£14.30m	£5.83m	£8.46m
		Best	687.03	£16.90m	£8.75m	£8.14m

Wider off-site supply

- 3.2.11 Data identified five registered biodiversity net gain sites in Wealden District. Four of these were habitat banks with unallocated capacity and one was a small, pre-committed offset parcel. The main in-district habitat banks were Masketts Farm Habitat Bank, Longbridge at Warren Farm, Skinners Farm / Wealden BNG Habitat Bank and Environment Bank's Blackboys Habitat Bank. Together, these four sites represented approximately 465 unallocated biodiversity units at the time of review.
- 3.2.12 The review also identified adjoining-area and adjacent National Character Area off-site biodiversity unit provision, including Ardingly Habitat Bank, Culver, Cowlease and Bridge Farms, Great Ote Hall Estate, Iford Biodiversity Project and Beeches Farm sites. These sites varied in scale, habitat offer and allocation status at the time of review but provide approximately 1,343 biodiversity units.
- 3.2.13 Table 3.11 summarises the market provision identified through the register-derived and market-facing review.

Table 3.11: Habitat bank and wider market provision

Supply tier	Examples	Geography / relationship to Wealden	Review findings supporting BNG feasibility assessment
Primary: in-district	Masketts Farm Habitat Bank; Longbridge at Warren Farm; Skinners Farm / Wealden BNG Habitat Bank; Environment Bank's Blackboys Habitat Bank	Within Wealden District, including High Weald and Low Weald National Character Areas.	• Approx. 465 unallocated habitat units. • Register-derived review identified four meaningful Wealden habitat banks. • Includes grassland, scrub, meadow, woodland, orchard, wet woodland, trees and hedgerow components.
Secondary: adjoining area	Iford Estate / Iford Biodiversity Project; Ardingly Habitat Bank; Culver, Cowlease and	Nearby Sussex, South Downs National Park and adjoining	• Potential adjoining-area resilience supply. • Relevant for wider market context. • Some large nearby

Supply tier	Examples	Geography / relationship to Wealden	Review findings supporting BNG feasibility assessment
	Bridge Farms; Great Ote Hall Estate; Beeches Farm sites	authority provision.	sites appear substantially unallocated.
Tertiary: wider market	National and regional provider networks, including Environment Bank's wider network, Wildlife Trusts, and broker-led or provider networks operating in the South East.	Wider South East and national market provision.	• Wider fallback capacity if local/adjoining supply is insufficient. • Useful market context, but weaker spatial alignment.

4. Discussion

4.1 Local Plan Typologies

- 4.1.1 Analysis of the reasonable case BNG scenario for each typology showed a range in the potential on-site delivery of BNG and associated costs of offsetting to attain threshold targets.
- 4.1.2 The large greenfield typology was found to be capable of delivering approximately 20% BNG within the assumed development parameters under the reasonable case scenario, achieving 19.77% BNG on-site. Variability in practice will depend largely on the quality of the baseline habitats and the potential for enhancement of retained features. Whilst a small amount of off-site provision or minor adjustment to development parameters may be required to consistently achieve or exceed 20% BNG, the evidence indicates that a 20% target is deliverable for this typology. The per dwelling cost of increasing from 15% to 20% is only £3, and even achieving 25% only represents a £123 per dwelling increase above the cost of achieving the mandatory 10%, which translates as only 0.17% of total per dwelling construction costs. The cost implications of increasing the threshold from 15% to 20% and even 25% for this typology appear limited.
- 4.1.3 The medium greenfield typology reasonable case scenario achieved 11.18% BNG on-site. This is largely because the sites were generally determined to have low-value baseline habitats, which could easily be compensated within the site boundary through habitat creation. Whilst a 15% or 20% BNG requirement would require some additional off-site biodiversity unit provision, the level of offsetting required remains relatively modest at 4.78 units and 11.03 units respectively. The additional costs associated with these higher thresholds also remain proportionate, increasing from £1,458 per dwelling at the statutory 10% requirement to £1,721 per dwelling at 15% BNG and £2,065 per dwelling at 20% BNG. These findings indicate that 15% and 20% BNG requirements are achievable for this typology, albeit with a degree of reliance on off-site biodiversity unit provision.
- 4.1.4 The small greenfield typology reasonable case scenario delivered a significant net loss of -29.06 BNG on-site. As in the study typology, in real-world situations, these sites often have a much lower flexibility to avoid impacts on higher value habitats or compensate within the small proportion of land available outside the development footprint, so where there is habitat of any value, it is not usually possible to achieve a gain on-site. In addition, due to the medium / high distinctiveness off-site habitats required (i.e. ponds, other neutral grassland,

woodland) and the larger number of biodiversity units required relative to the baseline, the per dwelling cost of achieving 10% is higher than other typologies, both in absolute terms (£3,148) and expressed as a percentage of per dwelling construction costs, with 10% BNG constituting 1.76% and the maximum tested 25% BNG constituting 2.33% of per dwelling construction costs.

- 4.1.5 The small industrial site typology reasonable case scenario delivered a net loss of - 7.60%. The typology included areas of medium distinctiveness grassland habitats, which were not possible to retain or enhance, or compensate for in the available land outside the development footprint. In this case, offsetting would be required, however, the number of off-site biodiversity units required is minimal and therefore the additional cost to the development is unlikely to be significant. As this typology cannot be considered in terms of per dwelling cost, the overall delivery cost is discussed here. For delivery of 10% BNG the per site typology cost was £6,583.89. To achieve gains of 15%, 20% and 25% increases costs to £7,409.77, £8,235.43 and £9,061.09, respectively.

Windfall sites

- 4.1.6 The indicative windfall medium brownfield typology reasonable case scenario achieved only 8.45% BNG. The low value and small scale of habitats, however, meant that the cost of offsetting was relatively low; within the typology the cost of delivering 10% BNG was £58 per dwelling, which represents 0.04% of per dwelling construction costs. The additional cost of delivering 15%, 20% and 25% constituted 0.11%, 0.18% and 0.25% of per dwelling construction cost, respectively, with absolute totals remaining low. It should be noted that brownfield sites tend to be highly sensitive to variances in baseline habitats and the type of scheme, making a typology assessment less useful for the purposes of generalised decision-making. Sites that predominantly comprise built infrastructure can achieve very high percentage gains with fairly low levels of intervention, whereas those with even relatively small areas of habitat, even low distinctiveness (such as represented by the typology), can be very hard to improve or in many cases avoid net loss. Brownfield sites that have been partially or wholly colonised by vegetation are better considered as similar to greenfield sites, as they can support habitats of value that can be difficult to compensate for in an urban environment.
- 4.1.7 Previous versions of Wealden District's Local Plan viability assessment assumed a 1.4% per dwelling construction cost allowance for 20% BNG (from Quintic Advisory LLP). The figures presented in this study (Table 3.6) indicate that all except the small greenfield typology sit comfortably within this range at the modelled 20% BNG threshold and the additional costs can be evaluated as almost

de-minimis. The small greenfield typology, it should be noted, has a higher per dwelling percentage of construction cost figure even for the mandatory 10% BNG, than the 1.4% assumed by the previous Local Plan viability assessment for a 20% threshold.

- 4.1.8 The points above refer only to BNG costs. The off-site supply assessment indicated whether there is a realistic route to securing the additional biodiversity units where on-site delivery fell short. This distinction is important because the constraint varies by typology, with the large greenfield typology far less dependent than other typologies on off-site supply availability. These dependencies are discussed in the following section.

4.2 Off-site supply and policy considerations

- 4.2.1 The review found that the seven candidate off-site parcels provided by the Council could provide a meaningful in-district off-site BNG supply for Wealden; however, practical deliverability remains dependent on ownership, legal securing mechanisms, habitat suitability, management commitment, strategic significance and any relevant policy constraints. The supply is also uneven by habitat type and concentrated on a relatively small number of larger grassland-dominated parcels. This is significant because the assessment demonstrates that maximising biodiversity unit yield through the Metric tends to favour grassland enhancement, whereas wider nature recovery objectives require a broader range of habitats, including scrub, ponds, woodland and individual trees. The findings therefore highlight a likely trade-off between maximising total biodiversity unit supply and providing a more diverse habitat resource capable of supporting strategic nature recovery priorities. The concentration of supply within a limited number of large sites also increases reliance on the successful delivery of those parcels when considering higher BNG thresholds.
- 4.2.2 The positive indicative residual values shown in Table 3.10 indicate that, in principle, off-site habitat bank delivery has commercial value where biodiversity units can be sold at the assumed market values and delivery costs can be managed. This supports the assessment of deliverability and viability risk described in the methodology and provides confidence that the modelled off-site supply scenarios are not solely theoretical ecological capacity assessments. However, these values should not be read as direct profit. Habitat bank delivery requires upfront investment over the required registration period, and providers must price units to cover wider project costs, risk, contingency and return over time. The figures therefore show potential to support habitat bank delivery, rather than a profitability estimate.

- 4.2.3 Off-site Model 1 is the preferred off-site biodiversity unit supply scenario for the purposes of viability analysis, providing the greatest overall unit yield addressing the prevailing demand for grassland units, and optimal financial performance. Off-site Model 2 delivers a broader habitat mix which provides more resilience for demand for non-grassland units but produces fewer total units than Off-site Model 1. Off-site Model 2 is therefore as a habitat-diversification case, not a financial optimisation case. It demonstrates that habitat diversification may improve strategic ecological goals, but must be balanced against overall unit yield, creation cost and potentially greater establishment risk.
- 4.2.4 Off-site Model 1 in-district supply provides sufficient biodiversity units to meet demand at 10% and 15% BNG thresholds, with a shortfall emerging against the 20% threshold. In the reasonable case, there is a shortfall of approximately 95 biodiversity units at 20% across the total assessed off-site provision. This does not necessarily mean that a 20% requirement is undeliverable, because the model assumes that all Local Plan sites require off-site units at the same time and does not consider potential for additional registered, adjoining-area or future market supply emerging. However, delivery of 20% would require confidence that suitable units would be available by habitat type, location and timing.
- 4.2.5 For the purposes of this assessment, it is reasonable to assume that in-district off-site biodiversity unit supply would primarily service the in-district development market. While the availability of biodiversity units will change over time as units are registered, allocated, sold or brought forward through new habitat banks, the current in-district supply assessment provides a reasonable guide to the scale of provision that may be available to support the Local Plan sites. The main caveat is additional windfall development, which may generate further demand beyond that captured in the Local Plan-based demand assessment.
- 4.2.6 The BNG Habitat register data shows an active off-site market within Wealden District and adjoining areas, but is not a guaranteed supply, as biodiversity unit availability can change quickly in response to market-led or site-specific considerations.
- 4.2.7 The existence of delivery models such as SDNPA's ReNature demonstrates that administrative boundaries do not necessarily constrain the biodiversity unit market. Habitat banks, biodiversity gain sites and nature recovery projects can operate across local authority boundaries whilst continuing to deliver strategically significant ecological outcomes. This is particularly relevant where ecological networks, river catchments, woodland networks and priority habitat areas extend

across multiple authorities (see section 5.5 for further consideration of cross-boundary BNG approaches).

- 4.2.8 The key off-site capacity risk is a functional shortfall, where off-site biodiversity units may be available in quantity but their relevance for developments is constrained by habitat type or Metric-driven spatial risk, whereby the Metric uses a spatial risk multiplier to reduce the effective value of off-site habitat compensation as the distance from the development site increases. Pursuit of policies or measures that encourage an element of habitat diversification in off-site supply, as modelled in Offsite Model 2, may help alleviate this risk.
- 4.2.9 A further risk is that some habitat banks may be brought forward by market providers without direct Local Planning Authority involvement. This limits the Council's ability to determine site selection, although the LNRS, strategic significance rules, responsible authority engagement and local policy guidance can help influence whether units are brought forward in locations that contribute to nature recovery priorities.

4.3 Evidence Supporting Above 10% BNG Requirements

- 4.3.1 The evidence supporting a 15% district-wide BNG requirement is strong across both the off-site supply and typology cost analyses. The off-site supply estimate provides sufficient in-district biodiversity units with a margin. Whilst per dwelling costs vary between typologies, when considered as a proportion of per dwelling construction costs there is a de-minimis impact across all modelled reasonable case (residential typology) scenarios, though for small greenfield sites this is a proportionately greater burden. Large greenfield sites can be expected to achieve 15% BNG on-site within the typology assumed parameters, while other typologies may require some off-site purchase but at a lower cost than under the 20% and 25% tests.
- 4.3.2 The evidence supporting a 20% district-wide BNG requirement is more finely balanced. The off-site biodiversity unit supply assessment shows a shortfall that is relatively modest and could reasonably be addressed through best-case candidate parcel delivery, registered habitat bank capacity, wider area and additional market response over the Local Plan period. This is particularly the case when taking account of the spread of demand over the period rather than being concentrated at one time, as the analysis inherently assumes. In terms of the percentage of per dwelling construction costs, the move to 20% remains within or close to the draft viability allowance (1.4% of per dwelling construction costs) for most residential typologies assessed. For large greenfield sites, the increase is negligible because these developments can deliver 20% BNG on-site (although this still needs to be

taken into account in the context of other considerations for viability assessment). Medium greenfield and medium brownfield typologies also remain within anticipated viability ranges. Cost sensitivity is more likely considering the small greenfield typology, which exceeds the draft viability allowance even at the statutory 10% baseline due to its limited on-site delivery capacity and greater reliance on off-site biodiversity units. Consequently, the principal uncertainties associated with a 20% requirement relate to cost impacts for small greenfield sites and a small but potential risk of insufficient appropriate off-site biodiversity unit supply.

- 4.3.3 Given the above findings for the 20% threshold, the evidence in the study does not appear to support pursuit of a 25% BNG requirement by the Council, unless this is to be considered as part of a hybrid approach targeting this level of net gain at sites and / or areas of particular strategic value. Consideration of this approach is presented in section 5.4.

4.4 Adopting a Hybrid Approach

- 4.4.1 The evidence supports a differentiated policy approach. A 15% BNG requirement is justified and deliverable for allocations district-wide across the development typologies assessed. A 20% BNG requirement is also justified for strategic residential allocations of 100 dwellings or more, represented by the medium and large greenfield typologies. These developments show greater delivery capacity, lower proportional viability impacts and greater scope for on-site provision than smaller greenfield developments.
- 4.4.2 A hybrid approach would allow the Council to target higher biodiversity ambition where it is most deliverable and ecologically meaningful, supporting nature recovery objectives while reducing viability risk for smaller, more constrained sites. Location-based application of a 20% threshold should be LNRS-led, with the higher threshold linked to mapped Local Habitat Map areas. The BNG framework rewards specified habitat creation and enhancement measures delivered in locations in the LNRS Local Habitat Map, by applying the strategic significance multiplier in the Metric giving a 15% bonus in biodiversity units generated. Developers will therefore be encouraged to implement the right measures in the right places, to achieve a higher BNG target.

4.5 Cross boundary BNG policy collaboration

- 4.5.1 Whilst formal cross-boundary BNG policy mechanisms remain relatively uncommon, there is emerging evidence of strategic collaboration between LPAs, Local Nature Partnerships and environmental organisations to support consistent

approaches to BNG across larger geographical areas. The clearest South East example is the Kent Nature Partnership, which has promoted a county-wide ambition for 20% BNG across Kent and Medway. Under this approach, the Local Nature Partnership acts as a coordinating body supporting the development of consistent policy, guidance and implementation approaches, whilst individual local planning authorities retain responsibility for adopting BNG requirements through their own Local Plans. Similar approaches may become increasingly relevant as LNRSs mature and authorities seek to coordinate nature recovery priorities across administrative boundaries.

- 4.5.2 The assessment did not identify an equivalent formal system in Sussex at present. However, the Sussex LNRS and wider Local Nature Partnership provide mechanisms through which authorities may collaborate on habitat restoration priorities, ecological connectivity and biodiversity market development where these extend across administrative boundaries.
- 4.5.3 There is also evidence of cross-boundary BNG delivery mechanisms in the region, for example the SDNPA ReNature initiative. Through ReNature, habitat restoration projects within the National Park generate biodiversity units that can be used to satisfy mandatory BNG requirements associated with development both within and outside the National Park boundary. This provides a cross-boundary delivery mechanism whereby development in neighbouring authorities, including Wealden District, may contribute towards habitat restoration initiatives in the South Downs.
- 4.5.4 Wealden District sits within a wider network of strategic landscape scale nature recovery initiatives. These include the High Weald National Landscape Management Plan, the SDNPA's ReNature, the Weald to Waves landscape recovery initiative, the Rebuilding Nature 'Strategic Nature Network' and habitat restoration opportunities associated with internationally and nationally important sites such as Ashdown Forest and the Pevensey Levels. These initiatives demonstrate that nature recovery objectives within Wealden are closely connected to wider ecological networks extending beyond administrative boundaries and provide established channels for pursuit of a cross-boundary approach.

4.6 Policy Validation and Recommendations

- 4.6.1 A higher BNG requirement can reduce impacts on biodiversity and increase the amount and quality of habitat that development delivers, but it does not automatically mean that LNRS priorities will be met. The LNRS identifies the need for coordinated, practical and targeted action to reverse biodiversity decline and to direct investment towards the places and measures that can provide the greatest benefit for wildlife and people. Biodiversity gain is not solely a metric outcome:

well-located habitat creation and enhancement can contribute to ecological resilience, landscape connectivity and ecosystem services such as climate regulation, flood attenuation, water quality, pollination, access to nature and the quality of places in which people live and work. The benefit depends on how the policy is applied in practice, particularly whether new or enhanced habitats are directed towards the places, habitat types and ecological functions identified through the LNRS and other local evidence. An enhanced BNG target therefore provides a mechanism for securing measurable nature recovery through the development process, provided that delivery is aligned with LNRS priorities and supported by robust long-term management.

- 4.6.2 For Wealden, this is important because the district sits within a wider Sussex ecological network that includes the High Weald, the South Downs, river catchments, protected sites, farmed landscapes, woodland networks, species-rich grassland opportunities and urban green infrastructure. LNRS-led BNG delivery could help improve habitat condition and connectivity, support wetland and river corridor restoration, strengthen links between protected and priority habitats, and increase the role of green and blue infrastructure in nature recovery. The policy rationale for considering a BNG requirement above the statutory 10% minimum should be understood in the context of the wider need for nature recovery.
- 4.6.3 A higher BNG requirement has the potential to increase the level of private investment available to support these wider strategic objectives. Whilst BNG alone cannot deliver landscape-scale nature recovery, an increase from 10% would increase demand for biodiversity units and habitat creation opportunities. This may help improve the viability of habitat banks, encourage additional landowners to bring forward biodiversity gain sites and support larger-scale habitat restoration projects capable of delivering ecological connectivity, habitat buffering and resilience benefits that extend beyond individual development sites.
- 4.6.4 This is particularly relevant where opportunities exist to align biodiversity unit delivery with wider strategic initiatives. Examples may include strengthening ecological connectivity between woodland in the High Weald, supporting habitat restoration associated with the Weald to Waves corridor, South Downs ReNature initiative or Rebuilding Nature's Strategic Nature Network, or providing habitat buffering and resilience benefits for designated sites.
- 4.6.5 On this basis, the selected BNG requirement should be considered not only in viability and deliverability terms, but also as a policy tool for increasing the scale and quality of nature-positive outcomes across Wealden District. Optimised value of this depends on careful policy implementation, as discussed below.

- 4.6.6 The off-site biodiversity unit supply assessment demonstrated that a strategy focused solely on maximising biodiversity units is likely to favour grassland creation and enhancement (Off-site Model 1), whereas a strategy supporting wider nature recovery objectives should pursue delivery of a broader habitat mix, even where this results in a lower overall biodiversity unit yield (Off-site Model 2). Off-site supply is likely to be shaped by the demand created through policy. Where local planning guidance explicitly outlines desirable and undesirable off-site habitat types for specific areas, providers are more likely to respond by delivering units that meet those requirements through increased confidence that those units will be required by developers.
- 4.6.7 Another way that the Council could seek to ensure off-site supply of complex, diverse, and multi-tiered habitats such as scrub-woodland mosaics or wetlands rather than easy-to-establish grasslands is to become a habitat bank supplier, setting up council-backed habitat banking on public land. The high-level costs analysis presented in section 4 provides a broad indication of commercial viability, though more detailed analysis would be required to support any such initiative.
- 4.6.8 Strategic significance applied as a multiplier in the Metric is an important implementation mechanism because it encourages retention of important habitats and encourages habitat bank sites in strategically valuable locations. An increased BNG requirement would create greater demand for biodiversity units that are strategically significant, and hence may increase demand for strategically located habitat banks, although the study has not assessed whether this results in higher market values for those units.
- 4.6.9 LPAs can promote these benefits by publishing clear spatial priorities following the Biodiversity Gain Hierarchy. The Council may also wish to provide supplementary guidance on the preferred location of biodiversity unit delivery, for example prioritising in order:
- on-site delivery where it is ecologically appropriate, compatible with good design and capable of being secured for the required period;
 - in-district off-site delivery, particularly on Wealden District Council candidate sites, registered habitat banks or sites aligned with LNRS mapped measures or locally identified ecological network priorities;
 - adjoining-area delivery where there is a clear ecological relationship to Wealden, such as shared catchments, landscape-scale corridors, protected landscape priorities or nearby Sussex habitat banks. This could include explicit

promotion of the landscape-scale nature recovery networks previously mentioned;

- wider market credits (including statutory credits) only where local and adjoining-area supply is demonstrably unavailable, unsuitable or insufficient, and where spatial risk implications are transparently addressed.

- 4.6.10 The Council cannot fully control where market-led habitat banks come forward, but policy can influence delivery by requiring applicants to explain how their BNG strategy follows the above hierarchy, why any off-site units selected are appropriate, and whether the habitat type and location align with LNRS priority areas and other locally evidenced ecological network priorities, with habitat creation and enhancement proposals delivered in accordance with the relevant mapped measures. This provides a decision-making mechanism for preferring strategically aligned provision.
- 4.6.11 High strategic significance should only be assigned where habitat creation or enhancement is located in an LNRS Local Habitat Map area and is consistent with the mapped measure(s) identified for that location. LPAs should establish a robust process to verify that proposed measures genuinely align with mapped measures, during application reviews.
- 4.6.12 As mentioned at the beginning of this section, successful BNG outcomes also depend on the long-term delivery of developers' biodiversity gain plans (mandatory documents to show how BNG will be achieved over the required 30-year horizon). The Council's approach to this will be critical to success, with measures including securing robust 30-year Habitat Management and Monitoring Plans, legal and planning mechanisms such as Section 106 Agreements, Conservation Covenants and planning conditions, financial and administrative controls such as up-front monitoring fees, data management tools and systems to track compliance, and cross-department collaboration connecting ecology, planning and enforcement teams.
- 4.6.13 The wider benefit of a higher BNG requirement therefore depends on how it is implemented in policy, supplementary guidance and long-term controls. Without this, there is a risk that the policy simply generates more biodiversity units without securing the habitat types, locations or ecological functions most important for nature recovery in Wealden District.
- 4.6.14 This study provides a strategic-level assessment of how enhanced BNG requirements could support the LNRS. Further spatial analysis would be needed if

the Council requires detailed quantification of the likely contribution of BNG to individual LNRS priorities or mapped measures.

5. Conclusions

- 5.1.1 The typology approach is a recognised method for viability assessment that allows for a relatively large number of sites to be represented efficiently with a suitable degree of accuracy. It cannot provide a detailed assessment of every potential development site, so policy decision-making must account for a degree of variation between sites that is not captured in this assessment. Similarly, this study assumes availability of off-site biodiversity units within the district as indicated by the current potential supply assessment, which is subject to successful delivery and market change throughout the Local Plan period. Subject to these primary limitations - and to subsequent viability assessment - the study makes the following conclusions to inform the Local Plan viability assessment as a factor alongside other development cost and viability considerations:
- 5.1.2 A district-wide 15% BNG requirement is supported for BNG delivery on all development typologies, as presented in Table 3.5 and Table 3.6 (the highest burden being on small greenfield sites, of £316 above the 10% BNG baseline/ 1.95% of construction cost per dwelling). This reflects the combination of typology-specific on-site BNG delivery capacity, the relatively modest uplift in per dwelling costs at thresholds above the mandatory 10% BNG requirement, especially when considered as a percentage of per dwelling construction costs, and the availability of sufficient modelled in-district off-site biodiversity unit supply under a reasonable supply case.
- 5.1.3 A district-wide 20% target is likely to be financially viable for most of the typologies assessed, with costs remaining within the accepted viability allowance for large greenfield, medium greenfield and brownfield typologies. Small greenfield sites represent the most cost-sensitive typology and exceed the viability allowance used in previous Local Plan evidence, indicating that additional viability consideration may be required for this category of development. There is also uncertainty relating to long-term off-site biodiversity unit supply and habitat availability, though at a margin which is considered reasonably likely to be addressed through additional market capacity emerging and staggered demand-supply interaction, which is not accounted for in the model.
- 5.1.4 Given that a 20% district-wide BNG requirement is already a finely balanced option, the consideration of a district-wide 25% requirement is not supported and is likely to only be realistic for certain large and / or strategically located developments. Though per dwelling costs remain within or close to the draft allowance in viability assessment, significant shortfall in available off-site biodiversity units is likely to exist, to meet this threshold on a district level.

- 5.1.5 The evidence supports a differentiated BNG policy approach. A district-wide requirement of 15% BNG is justified for allocations across all development typologies assessed, whilst a higher requirement of 20% BNG is justified for larger strategic allocations of 100 dwellings or more. The typology evidence demonstrates stronger delivery capacity, lower proportional viability impacts and greater opportunities for on-site provision within these larger developments. This approach provides an appropriate balance between increasing biodiversity outcomes and maintaining deliverability across smaller and more constrained development typologies. This could include schemes where the development or associated off-site provision deliver LNRS priorities, through a spatial approach aligned with the LNRS Local Habitat Map. This would allow higher biodiversity ambition to be focused where it is most deliverable and ecologically meaningful, furthering nature recovery objectives while reducing viability risk for smaller, more constrained and / or lower-impact developments.
- 5.1.6 The above conclusions are presented in Table 5.1; these outcomes are based on BNG impacts alone; full viability analysis will take this into account alongside other considerations.

Table 5.1: Policy options for enhanced BNG requirement

Option	Evidence position	Rationale
10% statutory minimum	Supported by off-site supply and lowest cost burden	Easiest to support from a viability perspective but does not fully utilise BNG capacity to enhance the LNRS delivery opportunity.
15% district-wide requirement	Supported by available in-district off-site supply and deliverable across the development typologies tested.	Provides a clear enhancement above the statutory minimum whilst maintaining a proportionate cost burden.

Option	Evidence position	Rationale
20% district-wide requirement	Potentially supportable for most typologies, but not clearly supported as a uniform district-wide requirement on the current evidence. Small greenfield sites exceed the draft viability allowance even at the statutory 10% baseline, and a modest off-site supply shortfall is modelled at 20%.	The principal uncertainty relates to off-site biodiversity unit supply and habitat availability, though the model assumes an unlikely, 'all-at-once' demand-supply scenario. Small greenfield sites remain the most cost-sensitive typology assessed.
Preferred policy approach: 15% district-wide with 20% on strategic allocations (100+ dwellings)	Supported by the typology, cost and off-site supply evidence. Large and medium greenfield typologies demonstrate stronger delivery capacity, lower proportional viability impacts and greater opportunities for on-site delivery.	Provides a robust and proportionate approach that secures enhanced biodiversity outcomes across all development whilst targeting a higher level of ambition where the evidence indicates it is most deliverable. Aligns enhanced BNG requirements with larger strategic developments that are best placed to support delivery of 20% BNG.
25% district-wide requirement	Not supported by current off-site supply evidence and creates a clearer cost escalation, though not significant in terms of percentage of costs, for all typologies.	Material shortfall against currently identified off-site supply and likely to require substantial additional in-district, adjoining-area or wider market provision. Per-dwelling costs rise further and would need particularly strong viability justification for smaller sites.

- 5.1.7 An increased BNG requirement will measurably contribute to wider nature recovery and ecosystem service-provision aims by reducing impacts on biodiversity from development and increasing the amount and quality of habitat that development is required to deliver, and by stimulating market confidence and private investment to support these wider strategic objectives through targeted BNG delivery and further habitat bank capacity. However, positive nature recovery outcomes will depend on the establishment of clear policy, guidelines and implementation safeguards, to

ensure that long-term BNG delivery is realised, that measures are aligned with LNRS priorities, and that appropriate off-site biodiversity units are available.

- 5.1.8 Policy development should focus on linking the preferred BNG requirement threshold(s) to Wealden's LNRS priorities, the district's role within wider Sussex ecological networks, and the evidence from this study on what can realistically be achieved on-site and off-site, following viability assessment.

6. References

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Appendix A: Best, reasonable and worst-case typology assessments

Table A1: Best, reasonable and worst scenario BNG scores compared to minimum 10% target, and additional biodiversity units required to achieve 15%, 20% and 25%.

Typology	Scenario	BNG score (%)	Additional BU to achieve threshold			
			10%	15%	20%	25%
Large greenfield	Best	34.9	0.0	0.0	0.0	0.0
	Reasonable	19.8	0.0	0.0	0.7	16.2
	Worst	10.7	0.0	13.4	28.9	44.4
Medium greenfield	Best	13.4	0.0	2.0	8.2	14.5
	Reasonable	11.2	0.0	4.8	11.0	17.3
	Worst	10.1	0.0	6.2	12.4	18.7
Small greenfield	Best	-25.2	8.1	9.2	10.4	11.5
	Reasonable	-29.1	9.0	10.1	11.3	12.4
	Worst	-29.1	9.0	10.1	11.3	12.4
Medium brownfield	Best	8.5	0.1	0.6	1.0	1.4
	Reasonable	8.5	0.1	0.6	1.0	1.4
	Worst	5.8	0.4	0.8	1.2	1.7
Small industrial	Best	22.4	0.0	0.0	0.0	0.0
	Reasonable	-7.6	0.1	0.1	0.2	0.2
	Worst	-18.5	0.2	0.2	0.2	0.3

Table A2: Costs to deliver BNG on-site and total cost to achieve 10%, 15%, 20% and 25% gain including off-site biodiversity unit purchase where needed

Typology	Scenario	Cost of on-site BNG	10%		15%		20%		25%	
			site	per ha	site	per ha	site	per ha	site	per ha
Large greenfield	Best	£1,353,293	£792,221	£7,922	£960,407	£9,604	£979,672	£9,796	£1,406,263	£14,063
	Reasonable	£960,407	£792,221	£7,922	£960,407	£9,604	£979,672	£9,796	£1,406,263	£14,063
	Worst	£791,221	£791,220	£7,912	£1,158,914	£11,589	£1,585,505	£15,855	£2,012,096	£20,121
Medium greenfield	Best	£568,351	£568,351	£11,367	£622,845	£12,457	£794,857	£15,897	£966,870	£19,337
	Reasonable	£729,124	£729,124	£14,582	£860,679	£17,214	£1,032,692	£20,654	£1,204,704	£24,094
	Worst	£543,526	£543,526	£10,871	£713,612	£14,272	£885,624	£17,712	£1,057,637	£21,153
Small greenfield	Best	£92,478	£314,855	£31,486	£346,505	£34,651	£378,156	£37,816	£409,806	£40,981
	Reasonable	£67,653	£314,800	£31,480	£346,450	£34,645	£378,101	£37,810	£409,751	£40,975
	Worst	£67,653	£314,800	£31,480	£346,450	£34,645	£378,101	£37,810	£409,751	£40,975
Medium brownfield	Best	£2,311	£5,889	£589	£17,999	£1,800	£29,833	£2,983	£41,943	£4,194

Small industrial	Reasonable	£2,311	£5,889	£589	£17,999	£1,800	£29,833	£2,983	£41,943	£4,194
	Worst	£0.00	£10,183	£1,018	£22,293	£2,229	£34,127	£3,413	£46,237	£4,624
	Best	£3,278	£3,278	£13,113	£3,278	£13,113	£3,278	£13,113	£3,828	£15,314
	Reasonable	£3,557	£6,584	£26,336	£7,410	£29,639	£8,235	£32,942	£9,061	£36,244
	Worst	£3,557	£8,235	£32,942	£9,061	£36,244	£9,887	£39,547	£10,712	£42,850

Table A3: Total cost per dwelling by BNG threshold for residential typologies

Typology	No. residential units	Scenario	cost per dwelling, by BNG threshold			
			10%	15%	20%	25%
Large greenfield	5,000	Best	£158	£192	£195	£281
		Reasonable	£158	£192	£195	£281
		Worst	£158	£231	£317	£402
Medium greenfield	500	Best	£1,136	£1,245	£1,589	£1,933
		Reasonable	£1,458	£1,721	£2,065	£2,409
		Worst	£1,087	£1,427	£1,771	£2,115
Small greenfield	100	Best	£3,148	£3,465	£3,781	£4,098
		Reasonable	£3,148	£3,465	£3,781	£4,098
		Worst	£3,148	£3,465	£3,781	£4,098
Medium brownfield	100	Best	£58	£180	£298	£419
		Reasonable	£58	£180	£298	£419
		Worst	£102	£223	£341	£462

Table A4: Additional cost per dwelling above the 10% BNG baseline

Typology	Scenario	Additional cost, by BNG threshold			
		10%	15%	20%	25%
Large greenfield	Best	£158	+£34	+£37	+£123
	Reasonable	£158	+£34	+£37	+£123
	Worst	£158	+£73	+£159	+£244
Medium greenfield	Best	£1,136	+£109	+£453	+£797
	Reasonable	£1,458	+£263	+£607	+£951
	Worst	£1,087	+£340	+£684	+£1028
Small greenfield	Best	£3,148	+£317	+£633	+£950
	Reasonable	£3,148	+£317	+£633	+£950
	Worst	£3,148	+£317	+£633	+£950
Medium brownfield	Best	£58	+£122	+£240	+£361
	Reasonable	£58	+£122	+£240	+£361
	Worst	£102	+£121	+£239	+£360

Appendix B: Intervention cost assumptions used in the on-site and off-site BNG modelling

Intervention package	Component intervention	Component cost	Total package cost	Applied to
Other neutral grassland enhancement: moderate to good condition	Control of invasive species	£956/ha	£22,756/ha	Off-site supply Off-site Model 1 and Off-site Model 2
	Annual maintenance and monitoring regime over 30 years	£20,000/ha		
	Overseeding	£1,800/ha		
Modified grassland enhancement: poor to moderate condition	Control of invasive species	£956/ha	£22,756/ha	Worst-case grassland enhancement option
	Annual maintenance and monitoring regime over 30 years	£20,000/ha		
	Overseeding	£1,800/ha		
Modified grassland: poor condition enhancement to other neutral grassland: poor condition	Scarification	£1,800/ha	£29,339/ha	Reasonable-case grassland enhancement option
	Slot seeding and/or plug planting	£4,783/ha		
	Control of invasive species	£956/ha		
	Annual maintenance and monitoring regime over 30 years	£20,000/ha		
	Overseeding	£1,800/ha		
	Scarification	£1,800/ha	£46,222/ha	

Intervention package	Component intervention	Component cost	Total package cost	Applied to
Modified grassland: poor condition enhancement to other neutral grassland: moderate condition	Slot seeding and/or plug planting	£4,783/ha		Best-case grassland enhancement option
	Top-soil removal/inversion	£16,883/ha		
	Control of invasive species	£956/ha		
	Annual maintenance and monitoring regime over 30 years	£20,000/ha		
	Overseeding	£1,800/ha		
Non-cereal crop enhancement to other neutral grassland in moderate condition	Scarification	£1,800/ha	£46,222/ha	Grassland-led enhancement where applicable in the modelled scenarios
	Slot seeding and/or plug planting	£4,783/ha		
	Top-soil removal/inversion	£16,883/ha		
	Control of invasive species	£956/ha		
	Annual maintenance and monitoring regime over 30 years	£20,000/ha		
	Overseeding	£1,800/ha		
Mixed scrub enhancement: moderate to good condition	Infill planting	£1,000/ha	£22,000/ha	Off-site supply Off-site Model 1
	Control of invasive species	£1,000/ha		
	Cutting to create well-developed edge, clearings, glades or ride	Not separately quantified		

Intervention package	Component intervention	Component cost	Total package cost	Applied to
Pond enhancement: moderate to good condition	Annual maintenance and monitoring regime over 30 years	£20,000/ha	£4,832/ha	Off-site supply Off-site Model 1 pond enhancement
	Removal of duckweed or filamentous algae	£2,832/ha		
	Control of invasive species	£1,000/ha		
	Planting of suitable emergent, submerged or floating plants	£1,000/ha		
Created pond package	Digging and clay lining a 600m ² pond	£21,000 per pond	£46,000/ha or £26,000 per 0.06ha pond allowance before area-based conversion	Off-site supply Off-site Model 2 created pond allowance of 0.06ha per large site
	Planting of aquatic plants	£5,000 per pond		
Created mixed woodland package	Supply and plant 100 native bare-root transplants of at least five tree species	£1,685/ha	£44,453.50/ha	Off-site supply Off-site Model 2 created woodland component
	Maintenance including strimming around trees	£2,600/ha		

Intervention package	Component intervention	Component cost	Total package cost	Applied to
	and targeted species removal for two years			
	Replacement planting at 10%	£168.50/ha		
	Annual maintenance and monitoring regime over 30 years (includes replacement planting)	£40,000/ha		
Created mixed scrub package	Supply and plant 100 native bare-root transplants of at least five scrub species	£1,685/ha	£44,453.50/ha	Off-site supply Off-site Model 2 created scrub component
	Maintenance including strimming and targeted species removal for two years	£2,600/ha		
	Replacement planting at 10%	£168.50/ha		
	Annual maintenance and monitoring regime over 30 years (includes replacement planting)	£40,000/ha		

Appendix C: Summary of off-site habitat enhancement and creation assumptions by parcel and scenario

Parcel	Off-site Model	Case	Habitat enhancement / creation approach	Main habitat types contributing units	Biodiversity Units generated	Summary note
GSLA 2	1 and 2	Worst	Enhancement only	Grassland	2.31	Small parcel with limited uplift from grassland enhancement.
GSLA 2	1 and 2	Reasonable	Enhancement only	Grassland	5.64	Additional grassland uplift achieved through a more realistic enhancement pathway.
GSLA 2	1 and 2	Best	Enhancement only	Grassland	9.57	Highest modelled grassland enhancement outcome for this parcel.
GSLA 9	1	Worst	Enhancement only	Grassland; heathland and scrub	207.39	Largest individual parcel contribution, dominated by grassland enhancement.
GSLA 9	1	Reasonable	Enhancement only	Grassland; heathland and scrub	219.04	Grassland remains the main source of units, with a small scrub contribution.
GSLA 9	1	Best	Enhancement only	Grassland; heathland and scrub	263.51	Highest Off-site Model 1 parcel yield, reflecting

Parcel	Off-site Model	Case	Habitat enhancement / creation approach	Main habitat types contributing units	Biodiversity Units generated	Summary note
						stronger grassland enhancement assumptions.
GSLA 9	2	Reasonable	Enhancement plus creation on larger parcel	Enhanced grassland; created ponds; created mixed woodland; created mixed scrub; enhanced mixed scrub	c.153.88	Off-site Model 2 reduces total unit yield compared with Off-site Model 1 but increases habitat diversity
GSLA 9	2	Best	Enhancement plus creation on larger parcel	Enhanced grassland; created ponds; created mixed woodland; created mixed scrub; enhanced mixed scrub	c.195.00	Best case retains a higher grassland enhancement component while also delivering diversified created habitats.
GSLA 12	1	Worst	Enhancement only	Grassland; heathland and scrub	118.94	Major grassland-led contribution; scrub enhancement not generating units in the worst case.

Parcel	Off-site Model	Case	Habitat enhancement / creation approach	Main habitat types contributing units	Biodiversity Units generated	Summary note
GSLA 12	1	Reasonable	Enhancement only	Grassland; heathland and scrub	134.79	Grassland remains the main contribution, with additional scrub uplift.
GSLA 12	1	Best	Enhancement only	Grassland; heathland and scrub; lakes	164.2	Best case includes grassland, scrub and a small pond/lake component.
GSLA 12	2	Reasonable	Enhancement plus creation on larger parcel	Enhanced grassland; enhanced modified grassland; created ponds; created mixed woodland; created mixed scrub	c.161.81	Diversification adds pond, woodland and scrub creation while retaining key grassland enhancement.
GSLA 12	2	Best	Enhancement plus creation on larger parcel	Enhanced grassland; enhanced modified grassland; created ponds; created mixed woodland; created mixed scrub	c.187.52	Higher grassland enhancement and retained created habitat components increase total units.
GSLA 23	1	Worst	Enhancement only	Grassland	117.71	Major grassland-led contribution.

Parcel	Off-site Model	Case	Habitat enhancement / creation approach	Main habitat types contributing units	Biodiversity Units generated	Summary note
GSLA 23	1	Reasonable	Enhancement only	Grassland	119.93	Similar to worst case, with limited additional uplift.
GSLA 23	1	Best	Enhancement only	Grassland	142.57	Higher yield achieved through more ambitious grassland enhancement assumptions.
GSLA 23	2	Reasonable	Enhancement plus creation on larger parcel	Enhanced grassland; created ponds; created mixed woodland; created mixed scrub; enhanced modified grassland	c.105.66	Off-site Model 2 reduces total yield compared with Off-site Model 1 but broadens habitat delivery.
GSLA 23	2	Best	Enhancement plus creation on larger parcel	Enhanced grassland; created ponds; created mixed woodland; created mixed scrub; enhanced modified grassland; enhanced non-cereal crop	c.123.79	Best case includes additional enhancement of non-cereal crop to other neutral grassland.

Parcel	Off-site Model	Case	Habitat enhancement / creation approach	Main habitat types contributing units	Biodiversity Units generated	Summary note
GSLA 30	1	Worst	Enhancement only	Grassland	7.74	Small parcel contribution with no variation between cases.
GSLA 30	1	Reasonable	Enhancement only	Grassland	7.74	Same modelled uplift as worst case.
GSLA 30	1	Best	Enhancement only	Grassland	7.74	No further enhancement potential identified beyond the base uplift.
GSLA 30	2	All cases	Enhancement-only parcel carried forward from Off-site Model 1	Grassland	7.74	Off-site Model 2 does not modify this parcel because it is below the large-parcel threshold.
GSLA 32	1	Worst	Enhancement only	Grassland; heathland and scrub	22.27	Modest contribution from grassland and scrub enhancement.
GSLA 32	1	Reasonable	Enhancement only	Grassland; heathland and scrub	22.27	Same overall yield as worst case.

Parcel	Off-site Model	Case	Habitat enhancement / creation approach	Main habitat types contributing units	Biodiversity Units generated	Summary note
GSLA 32	1	Best	Enhancement only	Grassland; heathland and scrub	22.31	Only a marginal increase in the best case.
GSLA 32	2	All cases	Enhancement-only parcel carried forward from Off-site Model 1	Grassland; heathland and scrub	As per Off-site Model 1	Off-site Model 2 does not modify this parcel because it is below the large-parcel threshold.
GSLA 77	1	Worst	Enhancement only	Grassland	104.01	Major grassland-led contribution.
GSLA 77	1	Reasonable	Enhancement only	Grassland	112.23	Moderate uplift from grassland enhancement.
GSLA 77	1	Best	Enhancement only	Grassland	147.5	Higher yield achieved under best case grassland enhancement assumptions.
GSLA 77	2	Reasonable	Enhancement plus creation on larger parcel	Enhanced grassland; enhanced modified grassland; created ponds; created mixed woodland; created mixed scrub	c.128.83	Off-site Model 2 broadens habitat delivery while retaining a substantial grassland component.

Parcel	Off-site Model	Case	Habitat enhancement / creation approach	Main habitat types contributing units	Biodiversity Units generated	Summary note
GSLA 77	2	Best	Enhancement plus creation on larger parcel	Enhanced grassland; enhanced modified grassland; created ponds; created mixed woodland; created mixed scrub	c.164.11	Best case retains the largest grassland uplift while adding diversified created habitats.

Appendix D: On-site Typology Metric Summary Tables

Large Greenfield

Detailed Results

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Summary Figures

Net project biodiversity units (Including all on-site & off-site habitat retention / creation)	Area habitat units	61.30
	Hedgerow units	0.00
	Watercourse units	0.00

Total project biodiversity % change (Including all on-site & off-site habitat creation + retained habitats)	Area habitat units	19.77%
	Hedgerow units	0.00%
	Watercourse units	0.00%

Combined habitat retention and enhancement			
	Area Habitats	Hedgerows	Watercourses
Total on-site and off-site baseline area / length	100.00	0.00	0.00
Total on-site and off-site baseline units	310.00	0.00	0.00
Total on-site and off-site baseline area / length retained	15.50	0.00	0.00
Total on-site and off-site baseline units retained	64.00	0.00	0.00
Total on-site and off-site area / length proposed for enhancement	14.50	0.00	0.00
Total on-site and off-site baseline units proposed for enhancement	116.00	0.00	0.00
Total on-site and off-site baseline area / length lost	70.00	0.00	0.00
Total on-site and off-site baseline units lost	130.00	0.00	0.00

Area Habitats	Area habitats					
	On-site change by broad habitat type					
	Baseline		Post-development on-site		On-site change	
	Habitat group	On-site existing area	On-site existing value	On-site proposed area	On-site proposed value	On-site area change
	Cropland	50.00	100.00	0.00	0.00	-50.00
	Grassland	34.50	126.00	39.50	240.37	5.00
	Heathland and shrub	5.00	40.00	5.00	57.97	0.00
	Lakes	0.50	4.00	0.50	4.00	0.00
	Sparsely vegetated land	0.00	0.00	0.00	0.00	0.00
	Urban	5.00	0.00	50.00	28.95	45.00
	Wetland	0.00	0.00	0.00	0.00	0.00
	Woodland and forest	5.00	40.00	5.00	40.00	0.00
	Intertidal sediment	0.00	0.00	0.00	0.00	0.00
	Coastal saltmarsh	0.00	0.00	0.00	0.00	0.00
	Rocky shore	0.00	0.00	0.00	0.00	0.00
	Coastal lagoons	0.00	0.00	0.00	0.00	0.00
	Intertidal hard structures	0.00	0.00	0.00	0.00	0.00
	Watercourse footprint	0.00	0.00	0.00	0.00	0.00
	Individual trees	0.00	0.00	0.00	0.00	0.00

Medium Greenfield**Summary Figures**

Net project biodiversity units
(Including all on-site & off-site habitat retention / creation)

<i>Area habitat units</i>	13.97
<i>Hedgerow units</i>	0.00
<i>Watercourse units</i>	0.00

Total project biodiversity % change
(Including all on-site & off-site habitat creation + retained habitats)

<i>Area habitat units</i>	11.18%
<i>Hedgerow units</i>	0.00%
<i>Watercourse units</i>	0.00%

Combined habitat retention and enhancement

	Area Habitats	Hedgerows	Watercourses
Total on-site and off-site baseline area / length	50.00	0.00	0.00
Total on-site and off-site baseline units	125.00	0.00	0.00
Total on-site and off-site baseline area / length retained	1.00	0.00	0.00
Total on-site and off-site baseline units retained	8.00	0.00	0.00
Total on-site and off-site area / length proposed for enhancement	4.00	0.00	0.00
Total on-site and off-site baseline units proposed for enhancement	32.00	0.00	0.00
Total on-site and off-site baseline area / length lost	45.00	0.00	0.00
Total on-site and off-site baseline units lost	85.00	0.00	0.00

Area habitats

Area Habitats

On-site change by broad habitat type						
	Baseline		Post-development on-site		On-site change	
Habitat group	On-site existing area	On-site existing value	On-site proposed area	On-site proposed value	On-site area change	On-site unit change
Cropland	30.00	60.00	0.00	0.00	-30.00	-60.00
Grassland	15.00	45.00	12.50	93.95	-2.50	48.95
Heathland and shrub	1.00	8.00	1.00	11.59	0.00	3.59
Lakes	0.50	4.00	0.50	5.16	0.00	1.16
Sparsely vegetated land	0.00	0.00	0.00	0.00	0.00	0.00
Urban	2.50	0.00	35.00	20.27	32.50	20.27
Wetland	0.00	0.00	0.00	0.00	0.00	0.00
Woodland and forest	1.00	8.00	1.00	8.00	0.00	0.00
Intertidal sediment	0.00	0.00	0.00	0.00	0.00	0.00
Coastal saltmarsh	0.00	0.00	0.00	0.00	0.00	0.00
Rocky shore	0.00	0.00	0.00	0.00	0.00	0.00
Coastal lagoons	0.00	0.00	0.00	0.00	0.00	0.00
Intertidal hard structures	0.00	0.00	0.00	0.00	0.00	0.00
Watercourse footprint	0.00	0.00	0.00	0.00	0.00	0.00
Individual trees	0.00	0.00	0.00	0.00	0.00	0.00

Small Greenfield

Summary Figures

Net project biodiversity units
(Including all on-site & off-site habitat retention / creation)

<i>Area habitat units</i>	-5.78
<i>Hedgerow units</i>	0.00
<i>Watercourse units</i>	0.00

Total project biodiversity % change
(Including all on-site & off-site habitat creation + retained habitats)

<i>Area habitat units</i>	-25.15%
<i>Hedgerow units</i>	0.00%
<i>Watercourse units</i>	0.00%

Combined habitat retention and enhancement

	Area Habitats	Hedgerows	Watercourses
Total on-site and off-site baseline area / length	10.00	0.00	0.00
Total on-site and off-site baseline units	23.00	0.00	0.00
Total on-site and off-site baseline area / length retained	0.00	0.00	0.00
Total on-site and off-site baseline units retained	0.00	0.00	0.00
Total on-site and off-site area / length proposed for enhancement	0.50	0.00	0.00
Total on-site and off-site baseline units proposed for enhancement	4.00	0.00	0.00
Total on-site and off-site baseline area / length lost	9.50	0.00	0.00
Total on-site and off-site baseline units lost	19.00	0.00	0.00

Area habitats

Area Habitats

On-site change by broad habitat type						
	Baseline		Post-development on-site		On-site change	
Habitat group	On-site existing area	On-site existing value	On-site proposed area	On-site proposed value	On-site area change	On-site unit change
Cropland	0.00	0.00	0.00	0.00	0.00	0.00
Grassland	9.00	18.00	1.00	6.69	-8.00	-11.31
Heathland and shrub	0.25	2.00	0.25	2.90	0.00	0.90
Lakes	0.00	0.00	0.00	0.00	0.00	0.00
Sparsely vegetated land	0.00	0.00	0.00	0.00	0.00	0.00
Urban	0.50	1.00	8.50	4.92	8.00	3.92
Wetland	0.00	0.00	0.00	0.00	0.00	0.00
Woodland and forest	0.25	2.00	0.25	2.70	0.00	0.70
Intertidal sediment	0.00	0.00	0.00	0.00	0.00	0.00
Coastal saltmarsh	0.00	0.00	0.00	0.00	0.00	0.00
Rocky shore	0.00	0.00	0.00	0.00	0.00	0.00
Coastal lagoons	0.00	0.00	0.00	0.00	0.00	0.00
Intertidal hard structures	0.00	0.00	0.00	0.00	0.00	0.00
Watercourse footprint	0.00	0.00	0.00	0.00	0.00	0.00
Individual trees	0.00	0.00	0.00	0.00	0.00	0.00

Medium Brownfield**Summary Figures****Net project biodiversity units**

(Including all on-site & off-site habitat retention / creation)

<i>Area habitat units</i>	0.74
<i>Hedgerow units</i>	0.00
<i>Watercourse units</i>	0.00

Total project biodiversity % change

(Including all on-site & off-site habitat creation + retained habitats)

<i>Area habitat units</i>	8.45%
<i>Hedgerow units</i>	0.00%
<i>Watercourse units</i>	0.00%

Combined habitat retention and enhancement

	Area Habitats	Hedgerows	Watercourses
Total on-site and off-site baseline area / length	10.00	0.00	0.00
Total on-site and off-site baseline units	8.70	0.00	0.00
Total on-site and off-site baseline area / length retained	0.45	0.00	0.00
Total on-site and off-site baseline units retained	3.60	0.00	0.00
Total on-site and off-site area / length proposed for enhancement	0.00	0.00	0.00
Total on-site and off-site baseline units proposed for enhancement	0.00	0.00	0.00
Total on-site and off-site baseline area / length lost	9.55	0.00	0.00
Total on-site and off-site baseline units lost	5.10	0.00	0.00

Area Habitats	Area habitats						
	On-site change by broad habitat type						
	Baseline		Post-development on-site		On-site change		
	Habitat group	On-site existing area	On-site existing value	On-site proposed area	On-site proposed value	On-site area change	On-site unit change
	Cropland	0.00	0.00	0.00	0.00	0.00	0.00
	Grassland	0.45	0.90	#N/A	0.33	#N/A	-0.57
	Heathland and shrub	0.45	3.60	#N/A	3.60	#N/A	0.00
	Lakes	0.00	0.00	#N/A	0.00	#N/A	0.00
	Sparsely vegetated land	0.05	0.10	0.00	0.00	-0.05	-0.10
	Urban	9.05	4.10	9.50	5.50	0.45	1.40
	Wetland	0.00	0.00	0.00	0.00	0.00	0.00
	Woodland and forest	0.00	0.00	0.00	0.00	0.00	0.00
	Intertidal sediment	0.00	0.00	0.00	0.00	0.00	0.00
	Coastal saltmarsh	0.00	0.00	0.00	0.00	0.00	0.00
	Rocky shore	0.00	0.00	0.00	0.00	0.00	0.00
	Coastal lagoons	0.00	0.00	0.00	0.00	0.00	0.00
	Intertidal hard structures	0.00	0.00	0.00	0.00	0.00	0.00
	Watercourse footprint	0.00	0.00	0.00	0.00	0.00	0.00
	Individual trees	0.00	0.00	0.00	0.00	0.00	0.00

Small Industrial

Detailed Results

Return to results menu

Summary Figures

Net project biodiversity units (Including all on-site & off-site habitat retention / creation)	Area habitat units	-0.05
	Hedgerow units	0.00
	Watercourse units	0.00
Total project biodiversity % change (Including all on-site & off-site habitat creation + retained habitats)	Area habitat units	-7.60%
	Hedgerow units	0.00%
	Watercourse units	0.00%

Combined habitat retention and enhancement

	Area Habitats	Hedgerows	Watercourses
Total on-site and off-site baseline area / length	0.25	0.00	0.00
Total on-site and off-site baseline units	0.60	0.00	0.00
Total on-site and off-site baseline area / length retained	0.05	0.00	0.00
Total on-site and off-site baseline units retained	0.40	0.00	0.00
Total on-site and off-site area / length proposed for enhancement	0.00	0.00	0.00
Total on-site and off-site baseline units proposed for enhancement	0.00	0.00	0.00
Total on-site and off-site baseline area / length lost	0.20	0.00	0.00
Total on-site and off-site baseline units lost	0.20	0.00	0.00

Area Habitats	Area habitats						
	On-site change by broad habitat type						
	Habitat group	Baseline		Post-development on-site		On-site change	
		On-site existing area	On-site existing value	On-site proposed area	On-site proposed value	On-site area change	On-site unit change
	Cropland	0.00	0.00	0.00	0.00	0.00	0.00
	Grassland	0.00	0.00	0.00	0.00	0.00	0.00
	Heathland and shrub	0.05	0.40	#N/A	0.40	#N/A	0.00
	Lakes	0.00	0.00	0.00	0.00	0.00	0.00
	Sparsely vegetated land	0.05	0.10	0.00	0.00	-0.05	-0.10
	Urban	0.15	0.10	0.20	0.15	0.05	0.05
	Wetland	0.00	0.00	0.00	0.00	0.00	0.00
	Woodland and forest	0.00	0.00	0.00	0.00	0.00	0.00
	Intertidal sediment	0.00	0.00	0.00	0.00	0.00	0.00
	Coastal saltmarsh	0.00	0.00	0.00	0.00	0.00	0.00
	Rocky shore	0.00	0.00	0.00	0.00	0.00	0.00
	Coastal lagoons	0.00	0.00	0.00	0.00	0.00	0.00
	Intertidal hard structures	0.00	0.00	0.00	0.00	0.00	0.00
	Watercourse footprint	0.00	0.00	0.00	0.00	0.00	0.00
	Individual trees	0.00	0.00	0.00	0.00	0.00	0.00

Appendix E: Development applications used in review

Planning Application Number	Site Size	Development Proposals
WD/2026/0912/F	Small	3 new dwellings with parking
WD/2026/0888/FR	Small	New 18 x 19 m building
D/2026/0862/F	Small	Relocation of car parking
WD/2026/0040/MAJ	3.3 ha	Provision of agricultural facilities, cowshed and silage clamps, residential property
WD/2026/0761/F	0.032 ha	Solar panels
WD/2026/0513/FR	0.3 ha	Brewery development
WD/2026/0651/BGP	0.35 ha	2 Residential units
WD/2026/0111/MAJ	Small	School Building
WD/2025/2501/MAJ	3.51 ha	Provision of sports pitch, pathway, access
WD/2025/2402/MAJ	4.22 ha	New depot, building, solar farm
WD/2025/2368/MAJ	0.56 ha	New care home
WD/2025/2241/MAJ	184 Units	Residential properties
WD/2026/0118/MAJ	125 Units	Residential properties
WD/2025/2872/MAJ	21 Units	Residential properties
WD/2025/2873/MAJ	178 Units	Residential properties and GP
WD/2025/2269/MAO	140 Units	Residential properties
WD/2025/1954/MRM	400 Units	Residential properties
WD/2025/0376/MAJ	275 Units	Residential properties
WD/2024/2478/MRM	700 Units	Residential properties

