

Eastbourne Biodiversity Study

Eastbourne Borough Council

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Quality information

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1. Introduction

The Eastbourne Biodiversity Study

- 1.1 Eastbourne Borough Council (EBC) are in the process of preparing a new Eastbourne Local Plan (LP). This will be the key planning document that will shape, plan and manage growth, regeneration and development across the Borough, based on a 20-year vision for those parts of Eastbourne outside of the South Downs National Park (SDNP)¹. The proposed Local Plan period starts in 2019 and extends to 2039.
- 1.2 This current document (The Eastbourne Biodiversity Study) has been commissioned by Eastbourne Borough Council to undertake two exercises:
 1. Firstly, to examine a selection of sites proposed for allocation in the Eastbourne Local Plan to determine whether they contain any ecological constraints that are likely to interfere with the delivery of development.
 2. Secondly, given the requirement for 10% Biodiversity Net Gain (BNG) within the borough, there may be a need for offsite delivery of BNG for the borough in order to facilitate delivery of development on sites that cannot deliver their own on-site BNG. This report, therefore, sets out:
 - a. BNG calculations for a series of development site 'typologies' that can be used to determine the overall likely off-site BNG capacity required for the borough; and
 - b. A series of proposals for land parcels within or outside the borough boundary that could be investigated further regarding the delivery of that net gain.
- 1.3 **Note that the BNG study undertaken in this report is not intended to replace the detailed BNG calculations undertaken for each planning application.**

The Biodiversity Net Gain Requirement

- 1.4 Biodiversity Net Gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. It is provided in legislation by the Environment Act 2021 and within Eastbourne's Biodiversity Strategy² and it is becoming a legal requirement for all development consented via the Town & Country Planning Act (unless exempt) to deliver a minimum 10% BNG. Biodiversity improvements on a proposed site would be encouraged, but in circumstances where they are not possible, developers will need to secure offsite BNG for habitat creation or improvement elsewhere. To support the development of the next Eastbourne Local Plan, the Council has requested that AECOM undertake an assessment to help inform how much BNG will be required at a strategic level to deliver allocations identified in the developing Local Plan, whilst enabling the Council to meet its BNG targets.

¹ As the SDNP is covered by a separate Local Plan ([South Downs Local Plan - South Downs National Park Authority](#)) and Housing Needs Assessment ([General Report Template \(southdowns.gov.uk\)](#))

² Available at: [313258.pdf \(lewes-eastbourne.gov.uk\)](#) [accessed 24/08/2022]

Biodiversity in Eastbourne

National Character Areas (NCA)

1.5 The Borough of Eastbourne consists of two distinct National Character Areas. These character areas are distinguished by a combination of landscape, biodiversity, geodiversity and economic activity: The areas in Eastbourne Borough are:

- Pevensey Natural Area (No. 124) –the low-lying wetland area between Eastbourne and Bexhill. It also includes the urban centre of Eastbourne³.
- South Downs Natural Area (No. 125) - chalk downland located to the west of the Borough that stretches from the western extent of the Borough through to the Hampshire Downs⁴.

Statutory Nature Conservation Designations

1.6 Statutory designated sites have been illustrated in Appendix A, Figure A1 for reference.

International Designations

1.7 There are no internationally designated sites within the Borough; however, the Pevensey Levels SAC⁵ and Ramsar⁶ site is located just over 1km east the Borough. Much of Eastbourne is located within a continuation of the Pevensey Levels landscape. Eastbourne Park is hydrologically linked to the Pevensey Levels wetland. The Levels are one of the largest and least fragmented lowland wet grassland systems in south-east England and also include a small area of shingle and intertidal mudflats. The low-lying grazing meadows include a complex system of ditches which support rare and scarce aquatic plants, freshwater molluscs (including Ramshorn snail *Anisus vorticulus*) and dragonflies (*Odonata* spp), as well as breeding and wintering wildfowl.

National Designations

South Downs National Park

1.8 National Parks are recognised as landscapes of exceptional beauty, fashioned by nature and the communities which live in them. In 2010 the South Downs National Park (SDNP) was established based on the following Special Qualities: diverse, inspirational landscapes and breath-taking views; a rich variety of wildlife and habitats including rare and internationally important species; tranquil and unspoilt places; an environment shaped by centuries of farming and embracing new enterprise; great opportunities for recreational activities and learning experiences; well-conserved historical features and a rich cultural heritage; and distinctive towns and villages, and communities with real pride in their area. The South Downs National Park stretches from Eastbourne, through to East Hampshire.

Sites of Special Scientific Interest

1.9 Within Eastbourne, there are two Sites of Special Scientific Interest (SSSI). These are Willingdon Down SSSI located in the north of the Borough, and a

³ Available at: [NCA Profile:124 Pevensey Levels - NE478 \(naturalengland.org.uk\)](https://naturalengland.org.uk/nca-profiles/124-pevensey-levels) [accessed 25/08/2022]

⁴ Available at: [NCA Profile:125:South Downs - NE432 \(naturalengland.org.uk\)](https://naturalengland.org.uk/nca-profiles/125-south-downs) [accessed 25/08/2022]

⁵ Available at: [Pevensey Levels - Special Areas of Conservation \(jncc.gov.uk\)](https://jncc.gov.uk/pevensey-levels) [accessed 25/08/2022]

⁶ Available at: [Pevensey Levels | Ramsar Sites Information Service](https://jncc.gov.uk/pevensey-levels) [accessed 25/08/2022]

portion of Seaford to Beachy Head SSSI (SSSI Units 1, 10, 13 and 19) located along the south coast of the Borough.

- 1.10 Willingdon Down SSSI is designated for its nationally uncommon species-rich chalk grassland on steep slopes⁷. The SSSI has a good representative flora but several plants with a more restricted distribution also occur. The grasses sheep's fescue *Festuca ovina* and upright brome *Bromus erectus* dominate the sward in association with squinancywort *Asperula cynanchica*, dwarf thistle *Cirsium acaulon*, eyebright *Euphrasia nemorosa*, autumn gentian *Gentianella amarella*, fairy flax *Linum catharticum* and salad burnet *Sanguisorba minor*. Rarer plants include field fleawort *Senecio integrifolius*, bee orchid *Ophrys apifera*, burnt orchid *Orchis ustulata*, green winged orchid *Orchis morio* and a plant that is restricted to chalk grassland in South Britain, round headed rampion *Phyteuma tenerum*. Areas of gorse *Ulex europaeus*, hawthorn *Crataegus monogyna* and wayfaring tree *Viburnum lantana* scrub are valuable for roosting passerine birds such as lesser whitethroat and yellow hammer. The site is in Favourable condition.
- 1.11 Seaford to Beachy Head SSSI⁸ is an outstanding site of national importance for its biological and geological features. The diverse range of habitats includes herb-rich chalk grassland, chalk heath (a unique, rare habitat on chalk soils), maritime grassland, foreshore and chalk cliffs, river meanders, and Greensand reef. Together, these habitats support a number of nationally rare, nationally scarce and nationally significant plants, invertebrates and birds. The cliffs and chalk platform beneath, the Greensand reef, and the chalk escarpment at Cow Gap are identified in the Geological Conservation Review as outstanding for their geological and geomorphological interest. Units located within Eastbourne Borough are designated for the following features: Units 1 (sublittoral rock in Favourable condition), 10 (lowland calcareous grassland in Unfavourable – Declining condition), 13 (earth heritage/ geological interest in Favourable condition) and 19 (lowland dwarf heath in Unfavourable declining).

Marine Conservation Zone

- 1.12 Beachy Head East Marine Conservation Zone (MCZ)⁹ is located along the coastal extent of the Borough. It is an inshore site, located on the Sussex coast in the Eastern Channel region. It lies between Beachy Head lighthouse in the west and Hastings pier in the east. The MCZ extends just beyond 6 nautical miles offshore. The site is designated for its: high energy circalittoral rock, moderate energy circalittoral rock, littoral chalk communities, peat and clay exposures, ross worm (*Sabellaria spinulosa*) reefs, short-snouted seahorse (*Hippocampus hippocampus*), subtidal chalk, subtidal coarse sediment, and subtidal sand.

Non- Statutory Nature Conservation Designations

- 1.13 There are no Local Nature Reserves or National Nature Reserves within Eastbourne.

Local Wildlife Sites: Sites of Nature Conservation Importance

- 1.14 A Local Wildlife Sites (LWS) is a non statutory site that contains a substantive nature conservation value. They are identified and selected locally using agreed

⁷ Available at: [Willingdon Down \(naturalengland.org.uk\)](https://naturalengland.org.uk) [accessed 25/08/2022]

⁸ Available at: [SSSI detail \(naturalengland.org.uk\)](https://naturalengland.org.uk) [accessed 25/08/2022]

⁹ Available at: [Marine site detail \(naturalengland.org.uk\)](https://naturalengland.org.uk) [accessed 25/08/2022]

criteria and detailed ecological surveys. There are 13 LWS within Eastbourne (illustrated in Appendix A, Figure A2). These are as follows:

- Eastbourne Park [E121]: Large area of semi-natural habitat in the centre of Eastbourne supporting high levels of biodiversity and notable flora and fauna (310ha)
- Hollywell Cliffs [E78]: Cliff edge chalk grassland and chalk cliffs supporting characteristic flora and red data book floristic species (0.7ha)
- War Memorial Field Bank [E89]: Rich chalk downland flora and wych elms of considerable stature. Shading from trees may have reduced the chalk grassland extent (0.2ha)
- Willingdon Roundabout and Verges [E98]: Roadside banks and roundabout with considerable populations of orchids and chalk grassland floral communities (0.9ha)
- Langney Crematorium and Cemetery[E14]: Neutral grassland site with a mosaic of habitats. Includes semi-natural pond and woodland burial area. Considerable scope to increase biodiversity in this sizeable area (9.7ha)
- Leeds Avenue Reed Bed [E116]: Established species poor reedbed and marginal wetland areas in close proximity to Crumbles Sewer waterway. Currently in poor condition, but management plan in place. High potential for appreciation and learning (0.9ha)
- Sovereign Park [E07]: Vegetated shingle habitat and former remnant of The Crumbles shingle ridge system. Important flora of higher plants and scarce lichens (9.4ha)
- Hampden Park and Ham Shaw [E117]: Public access broadleaved woodland with notable epiphytic lichen and bryophyte flora and ancient woodland indicator species. Includes a large body of open water, a chalk stream and formal gardens (20.3ha)
- Ocklynge Cemetery [E86]: Chalk grassland with extensive areas of species rich sward. Likely rich in downland (and other) insect spp. May also be rich in fungi but more surveys required (8.0ha)
- Langney Levels [E119]: Network of drainage ditches rich in scarce waterside plants and clean water within an area of unimproved pasture and a broad water channel with rich flora, of note a red data species Sharp-leaved Pondweed (23ha)
- Crumbles and Horsey Sewer [E120]: Waterway habitat important for breeding birds that provides habitat connectivity and potential to reduce nutrient enrichment of water (7.7ha)
- Langney Centre Pond [E21]: Pond with interesting bank and marginal vegetation. Pond edges are boggy (0.6ha)
- Sovereign Harbour Beach [E118]: Vegetated shingle habitat, which now extends further southwards to cover almost entire length of beach as far as harbour arm (7.2ha)

Notable Road Verge or Designated Wildlife Verge

1.15 'Designated Wildlife Verge' is a non-statutory designation which identifies highway verges in East Sussex that have wildlife habitat significance. East Sussex County Council maintains a 'Notable Road Verge' dataset.

1.16 Two Notable Road Verges are present within the Borough. These are:

- Willingdon Road And Willingdon Roundabout [ID83]: Very good chalk flora, including: Bee Orchid (*Ophrys apifera*), Pyramidal Orchid (*Anacamptis pyramidalis*), and Common Spotted Orchid (*Dactylorhiza fuchsii*).
- A259, West Of Pevensey Bay [ID84]: Vegetated shingle community including: Fennel, Wild Parsnip, Mallow, Wild Carrot, Broom, Teasel, Oxeye Daisy, Viper's Bugloss.

Ancient Woodland

- Paradise Plantation – 1.3ha
- Beachy Brow Woods – 7ha
- Further Plantation – 4.2ha
- The Coombe/ Warren - 6.7ha
- Babylon Down – 0.9ha
- The Coppice – 0.5ha
- Hampden Park - 0.3ha
- Hampden Park Arboretum and Gardens 0.8ha

Sussex Priority Habitats

1.17 Thirteen Priority habitats are found within the Borough (Appendix A, Figure A3). These are:

- Chalk Grassland
- Neutral Grassland
- Floodplain Grassland
- Woodland
- Hedgerows
- Verges
- Arable Land
- Reedbed –
- Rivers & Streams
- Standing Freshwater Habitats
- Maritime Cliffs & Slopes
- Vegetated Shingle
- Marine

Other Biodiversity of Relevance in Eastbourne

Eastbourne Park

1.18 Eastbourne Park contains an ancient landscape that was formerly marshland interconnected with Pevensey Levels. Drainage systems have converted much of the former marshland into grassland but marshland remnants persist along the drainage ditch system and in the lowest lying area of the Site within West

Langney Level. These areas provide the greatest concentration of botanically interesting parts of the Park, where uncommon wetland plants and invertebrates can still be found, although rare species have been recorded from across Eastbourne Park. A total of 310ha of the Park is designated as Eastbourne Park LWS [E121].

Biodiversity Opportunity Areas

1.19 Eastbourne contains three Biodiversity Opportunity Areas (BOA).

1.20 Pevensey Levels BOA¹⁰ is located in the east of the Borough and extends north and eastwards towards Hailsham and Cooden. It lies on siltstone, mudstone and sandstone. Within Eastbourne the BOA comprises coastal and floodplain grazing marsh. Other habitats within the BOA outside of Eastbourne include coastal vegetated shingle, lowland fens, maritime cliff and slope, reedbeds, saline Lagoons, traditional orchards, wood-pasture and parkland, and woodland. The BOA also contains 76 BAP species. Opportunities within the BOA identified include: wetland habitat management, restoration and creation; coastal habitat management, restoration and creation; control of non-native invasive species; wetland bird interest; landowner advisory and agri-environment schemes; policy integration; and access improvements. Within Eastbourne, it includes Langney Levels LWS.

1.21 Eastbourne Marshes (BOA)¹¹ represents a priority area for the delivery of Biodiversity Action Plan (BAP) targets. The BOA lies mainly on mudstone and sandstone, with an area of chalk to the south. Within Eastbourne BOA covers approximately 487 hectares. It is a wetland area that is confined by the urban extent of Eastbourne. The area comprises open water, reedbed and wet grassland. BAP habitats present include coastal and floodplain grazing marsh, coastal vegetated shingle with sections displaying a good diversity of shingle plants and reedbed. It also contains 27 BAP species. This area includes much of Eastbourne Park. Within Eastbourne, it includes Langney Levels LWS, Horsey and Crumbles Sewer LWS, and Leeds Avenue Reedbed LWS. Opportunities identified includes: wetland habitat management, restoration and creation; coastal habitat management, restoration and creation; education and community engagement; access improvements; flood alleviation; control of invasive species on vegetated shingle; and survey and monitoring

1.22 The west of the Eastbourne includes Seaford to Eastbourne Downs BOA¹². This is located within the South Downs National Park. The BOA lies on chalk. Within Eastbourne, habitats are dominated by lowland calcareous grassland. Other habitats present outside of Eastbourne include: coastal and floodplain grazing marsh, coastal saltmarsh, coastal vegetated shingle, lowland meadows, maritime cliff and slope, traditional orchards, reedbeds, saline lagoons, wood-pasture and parkland and woodland. It also contains 150 BAP species. Opportunities identified include: ecological networks; chalk heath management, restoration and creation; chalk grassland management, restoration and creation; wetland habitat management, restoration and creation; woodland management and diversification, education and community engagement; botanical interest; farmland bird interest; chalk grassland butterfly interest; landowner advisory and

¹⁰ Available at [Pevensey Levels Biodiversity Opportunity Area \(sussexlnp.org.uk\)](https://sussexlnp.org.uk) [accessed 01/09/2022]

¹¹ Available at: [Eastbourne Marshes Biodiversity Opportunity Area \(sussexlnp.org.uk\)](https://sussexlnp.org.uk) [accessed 25/08/2022]

¹² Available at: [Seaford to Eastbourne Downs Biodiversity Opportunity Area \(sussexlnp.org.uk\)](https://sussexlnp.org.uk) [accessed 01/-9/2022]

agri-environment schemes; floodplain restoration and reconnection; policy integration and grazing management.

- 1.23 These Biodiversity Opportunity Areas will become relevant in this report when discussing the need and potential for delivering strategic off-site biodiversity offsetting for development, in order to meet the minimum 10% Biodiversity Net Gain objective enshrined in law and in the Eastbourne Local Plan.

B-Lines

- 1.24 B-lines are areas that are identified by Buglife as areas containing opportunity to create habitat for the benefit of pollinators to encourage connectivity within and between habitats at a landscape scale. The western extent of Eastbourne Borough within the boundary the South Downs National Park is identified as a B-line.

Habitat Potential Modelling Work

- 1.25 Habitat potential modelling has been carried out for a number of habitats in Sussex in certain geographical areas to identify where habitat creation will be most effective (based on a range of parameters). Within Eastbourne modelling is provided for chalk grassland potential. The areas of chalk grassland potential are within the west of the Borough and within the South Downs National Park Authority jurisdiction.

Mapping a Nature Recovery Network in Sussex at the District Level

- 1.26 The Sussex Nature Partnership (funded by Natural England) is working with stakeholders to develop spatial/ strategic mapping of potential nature recovery networks at a district level. It also aims to identify a process for moving from a 'strategic' map to a 'delivery' map, to guide future action and investment in nature.
- 1.27 The project has to date produced a Core Areas map of Eastbourne that shows key wildlife land parcels; this includes rivers, designated sites (SSSI and LWSs), S41 Habitats 'Assets at Risk (NCIS), ancient woodland and S41 Habitats. In addition mapping has been produced to show 'Factors Supporting Delivery' for Eastbourne. This includes the National Park area, Tier 1 Local Authority Holdings, and land owned by the National Trust and Forestry Commission, as well as land under ESS Higher Level Stewardship. The final map is the 'Lawton Recovery Map'. This map shows potential recovery areas, including areas of high chalk grassland potential, Local Wildlife Site (failing SDL160), SSSI Units (not favourable), Biodiversity Opportunity Areas and B-Lines (Buglife).
- 1.28 To some extent the map of recovery areas is also of value when considering offsite Biodiversity Net Gain potential for development.

Eastbourne Biodiversity Strategy

- 1.29 In 2019 Eastbourne declared a Climate Emergency. The Council published the Eastbourne Carbon Neutral 2030: ECN2030 Eastbourne Borough Council Climate Emergency Strategy¹³ (hereafter referred to as ECN2030). To support ECN2030 nature -based solutions are a key feature of becoming a carbon neutral town by 2030. The Council has committed to supporting measures to arrest biodiversity loss and to restore habitats and species as part of the climate

¹³ Available at: [Eastbourne Carbon Neutral 2030 - Appendix 1 \(lewes-eastbourne.gov.uk\)](https://www.lewes-eastbourne.gov.uk) [accessed 24/08/2022]

resilience work. As a result Eastbourne's Biodiversity Strategy 2021 – 2025¹⁴ was published.

1.30 Eastbourne Biodiversity Strategy¹⁵ sets out principles, aims and actions to better tackle biodiversity loss and ecosystem degermation accords Eastbourne. These are under the five broad focal areas:

1. *'Collaboration through partnership working: The need for partnership and community involvement, including integrated working, to achieve tangible, meaningful biodiversity aims at a local level.*
2. *Preservation and enhancement of existing habitats: The need to protect and enhance existing biodiversity resources through biodiversity-led management, including council owned assets, designated sites, buffer zones, corridors and 'stepping stones'.*
3. *Create more and connect up: The need to achieve Nature Recovery Networks (NRNs) and Ecological Networks dedicating land specifically for biodiversity-rich habitats and wild landscapes, by increasing and creating new and joining up fragmented islands of habitat, such as nature reserves.*
4. *Implementation of Biodiversity Net Gain within development management: The need to implement meaningful, measurable and appropriate biodiversity net gains accurately and transparently in new developments – secured for the long term.*
5. *Promotion of biodiversity understanding council wide: The need for understanding and due process to ensure current and future biodiversity duties are being meaningfully met.'*

¹⁴ Available at: [313258.pdf \(lewes-eastbourne.gov.uk\)](#) [accessed 24/08/2022]

¹⁵ Available at: [313258.pdf \(lewes-eastbourne.gov.uk\)](#) [accessed 24/08/2022]

2. Methodology

Biodiversity Assessment

2.1 Ten land parcels were provided by the Council to be subject to a Biodiversity Assessment. These sites are listed in Table 1 and the locations are illustrated in Appendix A, Figure A2.

Table 1: Biodiversity Assessment Sites Provided by the Council

Site Cluster	Total Site Area
Land off Pevensey Bay Road	30 ha
Land at East Langney Levels	17.8 ha
Land at Larkspur Drive	0.3 ha
Sovereign Harbour Site 6	7.1 ha
Former Gas Works, Finmere Road	4.2 ha
Land NE St Anthony's Hill	1.2 ha
Land in Southbourne	32.2 ha
Land at Tutts Barn Lane	11.5 ha
Sussex Downs College	14.3 ha
Summerdown Playing Field	2 ha

2.2 These ten land parcels were subject to a desktop study to undertake a Biodiversity Assessment. This is to identify any constraints and opportunities of each land parcel.

2.3 Resources used to undertake the assessment are as follows:

- Multi-Agency Geographic Information for the Countryside (MAGIC)¹⁶
- Sussex Biodiversity Records Centre¹⁷
- Google (Aerial imagery)
- Eastbourne Open Space Assessment¹⁸
- Sussex Nature Partnership: Local Nature Recovery Strategies¹⁹.

¹⁶ <https://magic.defra.gov.uk/>

¹⁷ Where protected species data is detailed, data points within the site and within 50m of the site were included. Where data was only available to the polygon level, only species that are of relevance to the anticipated habitats on site were detailed. Only data from the past 10 years was noted. Further, an absence of evidence is not evidence of absence - records are impacted by factors such as recording effort, site accessibility, species detectability etc.

¹⁸ Available at: <https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/258527.pdf> [accessed 22/09/2022]

¹⁹ [Local Nature Recovery Strategies – Sussex Local Nature Partnership \(sussexlnp.org.uk\)](https://www.localnaturepartnership.org.uk/)

The Environment Act 2021 underpins the government's approach to establishing the Nature Recovery Networks. To develop a Local Nature Recovery Strategy for Sussex, the Partnership has undertaken a mapping exercise of the nature recovery network within Sussex at a District level²⁰. This mapping exercise included the development of a 'Lawton Recovery Map' at the District Level. The Lawton Recovery Map maps 'areas where habitats should be expanded, linked and created to create ecological networks'. Elements included are: areas of high chalk grassland potential, Local Wildlife Sites (failing SDL160), SSSI Units (not favourable), Biodiversity Opportunity Areas (BOA), High Weald habitat potential and B-Lines (Buglife).

- Great Crested Newt Impact Risk Zone.

As part of the District Level licencing scheme, mapping has been produced to show where great crested newts are likely to live and the most important areas to conserve. There are five risk zones under the Natural England district level licencing scheme:

- Black – nationally designated site for great crested newt – excluded from the scheme
- Red – highly suitable habitat – the most important areas for GCN
- Amber – suitable habitat – great crested newt likely to be present
- Green – moderate habitat suitability – great crested newt may be present
- White – low habitat suitability – low probability of great crested newt presence

More detail is available here:

<https://www.gov.uk/guidance/great-crested-newts-district-level-licensing-for-local-planning-authorities> and

<https://naturespaceuk.com/the-scheme/impact-map/>

Relevant Wildlife Legislation

2.4 The following legislation has been considered in respect of the Biodiversity Assessment:

- The Wildlife and Countryside Act 1981 (as amended)²¹;
- The Natural Environment and Rural Communities Act 2006²²;
- The Conservation of Habitats and Species Regulations 2019 (as amended)²³.
- Environment Act 2021²⁴

2.5 The relevance of this legislation is discussed in the following sub-sections.

²⁰ Available at: [7.-NRN-Mapping-Project Main-Report 220421.pdf \(sussexlnp.org.uk\)](https://www.sussexlnp.org.uk/7.-NRN-Mapping-Project-Main-Report-220421.pdf) [accessed 22/09/2022]

²¹ Her Majesty's Stationary Office (HMSO) (1981) Wildlife and Countryside Act 1981 (as amended)

²² HMSO (2006) Natural Environment and Rural Communities Act 2006

²³ HMSO (2017) The Conservation of Habitats and Species Regulations 2017

²⁴ Available at [Environment Act 2021 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2021/1) [accessed 05/07/2023]

The Wildlife and Countryside Act 1981 (as amended)

2.6 The Wildlife and Countryside Act 1981 (as amended) ('the WCA') is the major domestic legal instrument for wildlife protection in the UK and is the primary means by which the following are implemented:

- The Convention on the Conservation of European Wildlife and Natural Habitats ('the Bern Convention'); and
- The Council Directive 79/409/EEC on the Conservation of Wild Birds ('the Bird Directive') (Ref 6-9) [although the UK is no longer in the European Union, the list of species and the requirements for their protection as set out in the Directive are still the basis for the protection of birds in UK law].

2.7 The main relevant provisions of the Act are the allowance for the protection of the most important habitats and species by designating SSSIs, a level of protection to all nesting wild birds and species and bird species under Schedule 1.

The Natural Environment and Rural Communities Act 2006

2.8 Section 41 of the Natural Environment and Rural Communities Act 2006 ('the NERC Act') requires the listing of habitats and species that are of principal importance for the conservation of biodiversity, including those that have been identified as priorities within the UK Biodiversity Action Plan (UK BAP).

2.9 The NERC Act requires that the Section 41 list be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under Section 40 of the NERC Act 'to have due regard' to the conservation of biodiversity when carrying out their normal functions.

The Conservation of Habitats and Species Regulations 2019 (as amended)

2.10 The Conservation of Habitats and Species Regulations 2019 (as amended) transpose the requirements of Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora ('the Habitats Directive') into domestic legislation.

2.11 The Regulations identify European Protected Species (EPS) and various habitats of importance within the United Kingdom, with important sites for these habitats/species or both being designated as Special Areas of Conservation (SAC) and important sites for birds being designated as Special Protection Areas (SPAs). Any proposed development that may have a significant effect on a SAC or SPA should be assessed in relation to the site's 'conservation objectives' (i.e. the reasons for which the site is designated).

2.12 The Regulations also implement the species protection regime set out within the Habitats Directive, providing a clear legal basis for surveillance and monitoring of European Protected Species.

Environment Act 2021

2.13 The Environment Act 2021, published by the UK Government as the Environment Bill in October 2019 (Environment Bill, 2019), includes proposals to make biodiversity net gain (BNG) a mandatory requirement within the planning system in England. The biodiversity elements of the Act include:

- Strengthened biodiversity duty;

- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity;
- Local Nature Recovery Strategies to support a Nature Recovery Network;
- Duty upon Local Authorities to consult on street tree felling;
- Strengthen woodland protection enforcement measures;
- Conservation Covenants;
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature;
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation; and
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain.

Biodiversity Net Gain Eastbourne Typologies

- 2.14 A Biodiversity Net Gain (BNG) assessment involves making a comparison between the biodiversity value of habitats present within a site/ land parcel prior to development (i.e., the ‘baseline’) and the predicted biodiversity value of habitats following the completion of the development (i.e., ‘post-development’). The comparison is made in terms of ‘biodiversity units’, with a ‘biodiversity metric’ providing the mechanism to allow biodiversity values to be calculated and compared.
- 2.15 Biodiversity Metric 3.1²⁵ calculates the overall loss or gain of biodiversity of development projects by assessing the distinctiveness (i.e., type of habitat and its value), condition, extent, and strategic significance of habitats on site pre- and post-development, including both permanent and temporary land-take areas. To achieve biodiversity net gain, the biodiversity unit score must have a post-development score higher than the baseline score.
- 2.16 When calculating the post-development biodiversity units, the metric includes a series of standard ‘risk multipliers’ to account for the inherent risk of creating and restoring habitats, the time taken to establish habitats and the location of the mitigation in relation to the habitats lost on site. The risk multipliers have the effect of reducing the value of the proposed habitats, which means larger areas, habitats of higher distinctiveness, and/or condition are required to mitigate for losses and achieve net gain.
- 2.17 The metric assesses and generates separate outputs for area-based habitats²⁶ (measured in habitat units) and linear based habitats, including hedgerows (measured in hedgerow units) and rivers (measured in river units) where appropriate. To claim a net gain in biodiversity, there must be an increase across all habitats, hedgerow and river units, the units cannot be summed to give an overall biodiversity unit value i.e., an increase in habitat and hedgerow units cannot be used to offset a loss in river units.

²⁵ Available at: [The Biodiversity Metric 3.1 - JP039 \(naturalengland.org.uk\)](#) [accessed 22/09/2022]

²⁶ This includes all area-based terrestrial and intertidal habitats. All habitats from the low water mark to the high-water mark can and should be assessed using Metric 3.1 where they are impacted by development. Any marine habitats beyond the low water mark cannot be assessed using Metric 3.1.

2.18 To support the development of the new Local Plan by enabling the Council to determine a broad strategic BNG requirement, different typologies of development site have been developed. To do this, AECOM made reference to work undertaken by Kent County Council (KCC) to inform viability assessments of the implications of seeking various levels of Biodiversity Net Gain (10%, 15% and 20%)²⁷. To aid that exercise, KCC produced a series of development 'typologies'. These were generic types of expected development from a small housing site to a large housing site and from a small industrial site to a large industrial site. KCC then undertook hypothetical assessments of those sites. This enabled them to take account of the fact that full formal Biodiversity Net Gain calculations require a great deal of information concerning the existing biodiversity of the site and the precise details of how the development of the site it to be accomplished and laid out.

2.19 For the Eastbourne exercise, six typologies have been developed to broadly represent habitats present within the Eastbourne Plan Area Boundary (i.e. excluding the area of the Borough within the South Downs National Park) and types of development expected to come forward over the Local Plan period.

2.20 The six typologies are:

- a) Small greenfield residential (broadly based on the St Anthony's Hill potential allocation)
- b) Large greenfield residential (broadly based on Land at East Langney Levels)
- c) Small brownfield residential (broadly based on Land off Tutts Barn Lane potential allocation UP03)
- d) Large brownfield residential (broadly based on Land off Tutts Barn Lane potential allocation UP03 & EP36)
- e) Offices (1000 sqm) (broadly based on Sovereign Harbour Site 6 potential allocation)
- f) Housing/ mixed use (redevelopment of an existing developed site) (broadly based on Sussex Downs College OC08 potential allocation)

Baseline Data

2.21 Typically baseline habitat data in the form of UKHab Classification category is required following a site visit. However, detailed habitat surveys were not undertaken for any of the typologies and instead habitats typical to Eastbourne were used. Linear features such as ditches and hedgerows can significantly affect the BNG calculations. However, since there is no information regarding how linear features would be handled for any allocated site at this stage, it was considered that attempting to include them at this early stage would further add to the assumptions needed without a site masterplan without adding much benefit to the broad analysis undertaken. They were not included in the assessment, only polygon habitat area, broadly following the Metric 3.1 guidance²⁸ and professional judgement.

2.22 All baseline habitats defined within the Site were assigned a condition using the condition assessment criteria outlined in the Biodiversity Metric 3.1 – User Guide and Technical Supplement²⁹. Similar to the habitat type data, no detailed surveys

²⁷ <https://kentnature.org.uk/wp-content/uploads/2022/07/Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf>

²⁸ Natural England (2022). The Biodiversity Metric 3.1 – User Guide & Technical Supplement

²⁹ Available at: [The Biodiversity Metric 3.1 - JP039 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/Information-and-data/Biodiversity/Biodiversity-Metric-3.1) [accessed 22/09/2022]

were undertaken so best judgement was used in defining the condition of each habitat. The data was aggregated and entered into the metric to calculate the baseline biodiversity units.

Post-Development Data

2.23 As no landscape or master plans were available for any of the typologies, it was assumed that for the small typology sites, all land would be lost and only off-site BNG provision would be viable. For the large typology sites, it was assumed that small portions of the sites would be available on-site for BNG provision. In some cases off-site BNG requirements would also be required. For ease of comparison, all typologies assumed that the post development target habitat would be grassland: other neutral grassland in good condition. The data was utilised to predict the post development biodiversity units.

Strategic Significance

2.24 Metric 3.1 requires that the strategic significance (hereafter referred to as 'SS') of all baseline and post-development habitats be defined. SS refers to strategic locations for local biodiversity and nature improvements, identified within local planning policies. MAGIC and SxBRC data was interrogated to aid determination of SS.

Caveats

2.25 The BNG typology assessments undertaken for this report are effectively hypothetical because full BNG assessment requires detailed site survey information (including quality of habitats) and, in particular, requires the fullest level of detail regarding exactly what parts of the site are to be developed and how, and exactly what existing ecological features are to be removed and new features to be created. The purpose of the exercise was to obtain an indication of the likely expected amount of off-site BNG provision for which Eastbourne Borough Council must prepare over the Local Plan period. These calculations are therefore not appropriate to be used to accompany planning applications even when potential allocated sites have been used as the broad template for the calculation.

2.26 For the purposes of this broad assessment, linear features (such as hedgerows and ditches) are not included in this assessment.

2.27 The formal BNG method, to be acceptable for grant of planning consent, is not simply a matter of calculating credits. There are also a series of Trading Rules with which developers must comply. The trading rules within the metric are a set of rules that try to prevent the 'trading down' of habitat distinctiveness. Under the trading rules losses of habitat are to be compensated for on a "like for like" or "like for better" basis. Because the development sites are being used as typologies and to keep the off-site BNG requirement calculations simple, the trading rules have not been used strictly in this assessment; rather the overall BNG offsetting units were used to broadly determine the overall amount of offsetting land that might be required off-site.

Site Visits

2.28 To support the development of the BNG typologies, site walkover visits were undertaken to help gain an understanding of the habitats on site. Sites visits were

undertaken by a Senior Ecologist on 7th September 2022. Weather conditions were fair and provided no constraints.

2.29 Whilst Google Earth Pro images was used to gain an understanding, walkover site visits were undertaken to ground truth the habitats shown to allow a greater accuracy to determine the broad habitats currently present on the sites and thus broadly within Eastbourne. Three sites were visited, these were Land off Tutts Barn Lane, Land at East Langney Levels, and Sovereign Harbour Site 6. Detailed habitat and botanical surveys were not undertaken (such as a Phase 1 or HabUK habitat surveys); however, broad habitats and broad condition of individual land parcel was noted. Linear features such as ditches and hedgerows were observed, but not included in the assessment.

2.30 The results of the site visits are provided in Appendix B Areas of Potential BNG Land Provision

2.31 To determine potential land parcels that could provide strategic BNG provision a desk based study was undertaken. The following data sources were used:

- Data provided by the Council on public or non-governmental organisation land ownership (Borough, or County Councils, or owned by a conservation body). Where land is in the public ownership, the provision of BNG will potentially be more simple and cheaper as it will not require the purchase of land.
- MAGIC³⁰ - Locations of NERC S41 priority habitats (notably Grassland: Floodplain Wetland Mosaic)
- Information regarding the three aforementioned Biodiversity Opportunity Areas in the Eastbourne boundary (Eastbourne Marshes, Seaford to Eastbourne Downs and Pevensey Levels)

2.32 Areas within Eastbourne were targeted, but land outside of Eastbourne Borough was also investigated because certain types of habitat (e.g. floodplain grazing marsh) can only be created in particular locations.

³⁰ <https://magic.defra.gov.uk/>

3. Results

Biodiversity Assessment

3.1 This section provides an analysis of the potential suitability of the ten land parcels provided by the Council for development. The following sections provide results of the Biodiversity Assessment including details of potential constraints and opportunities.

Land at Larkspur Drive

3.2 Table 2 provides the Biodiversity Assessment for Land at Larkspur Drive.

Table 2. Land at Larkspur Drive Biodiversity Assessment

Parameter	Detail
Size (ha)	0.36 ha
Developable Area (ha) ³¹	0.3 ha
Indicative Quantum of Development ³²	9 dwellings
Priority Habitats (NERC S41 habitat)	The site includes priority habitat: Coastal and floodplain grazing marsh
Priority Species	Priority Species for targeting: Lapwing and redshank
Site Designations	The entirety of the site is part of the wider Eastbourne Park Local Wildlife Site (LWS): Eastbourne Park LWS is a large area of semi-natural habitat in the centre of Eastbourne supporting high levels of biodiversity and notable flora and fauna
Protected and Notable Species Within c.50m of the Site ³³	<p>Birds: Ten species are listed on the Birds Directive including Osprey (<i>Pandion haliaetus</i>), Bittern (<i>Botaurus stellaris</i>), and Wood Sandpiper (<i>Tringa glareola</i>). Twenty species are listed on Schedule 1 Part 1 of the Wildlife and Countryside Act including Quail (<i>Coturnix coturnix</i>), Cetti's Warbler (<i>Cettia cetti</i>), and Bearded Tit (<i>Panurus biarmicus</i>). Seventeen species are listed under NERC S41.</p> <p>Invertebrates: Lesser Emperor (<i>Anax parthenope</i>) [Sussex Rare].</p> <p>Reptiles: Grass Snake (<i>Natrix Helvetica</i>), Common Lizard (<i>Zootoca vivipara</i>), Slow-worm (<i>Anguis fragilis</i>) - [WCA Sch5, NERC S41, UK BAP Priority]</p> <p>Plants: Tubular Water-dropwort (<i>Oenanthe fistulosa</i>) [NERC S41, UK BAP Priority]</p>

³¹ Provided by Eastbourne Borough Council

³² Provided by Eastbourne Borough Council

³³ Details provided by Sussex Biodiversity Records Centre

Parameter	Detail
Review of Aerial Images	Appears to be rough grassland and scrub, consistent with coastal and floodplain grazing marsh
EBC Lawton Recovery Mapping Detail	Immediately adjacent to the Eastbourne Marshes Biodiversity Opportunity Area (BOA)
GCN Impact Risk Zone	Red
Other constraints from desk study	The site is with the Eastbourne Park LWS. The site is classed as 'Natural Areas' within the Eastbourne Open Space Assessment
BNG opportunities	The site is immediately adjacent to Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision.
Other opportunities	The site is immediately adjacent to Eastbourne Marshes BOA and the entire of the site is with the Eastbourne Park LWS. This land is owned by Eastbourne Borough Council.

Constraints

- 3.3 This site is less suitable to be utilised as a development site. The site is part of the wider Eastbourne Park LWS, and the habitats within the site (coastal and floodplain grazing marsh) are anticipated to fall within the classification of a habitat of principal importance under S41 of the NERC Act. Development of this site will result in the loss of part of the LWS. At least as much new LWS type habitat will need to be created and designated to ensure no net loss of the LWS within Eastbourne.
- 3.4 The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site; however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy. This may include a reduction in the number of units deliverable within the site. Inevitably given the high level nature of this study other protected/notable species may be present and could impact the assessment. However, full protected species surveys would be required in any event to support a planning application.

Opportunities

- 3.5 The site is located immediately adjacent to Eastbourne Park LWS and Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision. It is understood that the land holding immediately adjacent to the site within the LWS and BOA is owned by Eastbourne Borough Council.

Land at East Langney Levels

3.6 Table 3 provides the Biodiversity Assessment for Land at East Langney Levels.

Table 3. Land at East Langney Levels Biodiversity Assessment

Parameter	Detail
Size (ha)	17.8 ha
Developable Area (ha) ³⁴	9.5 ha (much of the eastern part of the site is functional floodplain)
Indicative Quantum of Development ³⁵	212 dwellings
Priority Habitats (NERC S41 habitat)	The site includes priority habitat: Coastal and floodplain grazing marsh
Priority Species	Priority Species for targeting: Lapwing and redshank
Site Designations	Includes a portion (c. 9.6ha ha) of Langney Levels LWS: The LWS is a network of drainage ditches rich in scarce waterside plants and clean water within an area of unimproved pasture and a broad water channel with rich flora, of note a red data species Sharp-leaved Pondweed. NB: site was formerly LWS E001 and E004
Protected and Notable Species Within c.50m of the Site ³⁶	<p>Birds: Six species of bird are listed on the Birds Directive including Bar-tailed Godwit (<i>Limosa lapponica</i>), Glossy Ibis (<i>Plegadis falcinellus</i>), and Kingfisher (<i>Alcedo atthis</i>). Eight species of bird are listed on Schedule 1 Part 1 of the Wildlife and Countryside Act including Black Redstart (<i>Phoenicurus ochruros</i>), Cetti's Warbler (<i>Cettia cetti</i>), and Peregrine (<i>Falco peregrinus</i>). Ten species of birds are listed under NERC S41.</p> <p>Invertebrates: Brown-Banded Carder Bee (<i>Bombus humilis</i>) [NERC S41, UK BAP Priority, Sussex Rare], Small Heath (<i>Coenonympha pamphilus pamphilus</i>) [NERC S41, UK BAP Priority, Red List GB post2001 NT], and Cinnabar (<i>Tyria jacobaeae</i>) [NERC S41, UK BAP Priority]</p> <p>Mammals: West European Hedgehog (<i>Erinaceus europaeus</i>) [NERC S41, UK BAP Priority, Red List GB post2001 VU]</p>
Habitats on site	Following a site visit, habitats on site that were accessible/visible include: floodplain grazing marsh, ditch, scrub, hedgerows, tall ephemeral vegetation, mosaic habitats, and hard standing. Areas not visible during the site visit include residential properties and land parcel LA43. From a review of aerial imagery these land parcels consist of tussocky grassland, ditches, hedgerows, dwellings and associated gardens.

EBC Lawton Recover Within the Eastbourne Marshes BOA Mapping Detail

³⁴ Provided by Eastbourne Borough Council

³⁵ Provided by Eastbourne Borough Council

³⁶ Details provided by Sussex Biodiversity Records Centre

Parameter	Detail
GCN Impact Risk Zone	Green and White
Other constraints from desk study	This site includes c. 9.6 ha of the Langney Levels LWS.
BNG opportunities	The site is within the Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision.
Other opportunities	Land parcel LA37 is owned by Eastbourne Borough Council.

Constraints

- 3.7 This site is less suitable to be utilised as a development site. The site is part of the wider Langney Levels LWS, and the habitats within the site (coastal and floodplain grazing marsh) are anticipated to fall within the classification of a habitat of principal importance under S41 of the NERC Act. Development of this site will result in the loss of part of the LWS. At least as much new LWS type habitat will need to be created and designated to ensure no net loss of the LWS within Eastbourne.
- 3.8 The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy. This may include a reduction in the number of units deliverable within the site. Inevitably given the high level nature of this study other protected/notable species may be present and could impact the assessment. However, full protected species surveys would be required in any event to support a planning application.

Opportunities

- 3.9 The site contains c. 9.6 ha of Langney Levels LWS and is within Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site (or part thereof) could potentially be enhanced to provide BNG provision on site. It is understood that the land parcel LA37 within the LWS and BOA is owned by Eastbourne Borough Council. From the site visit, LA37 appears to be a matrix habitat of tall grasses and herbs and scrub, located in a wetter environment. This site is designated as Coastal and floodplain grazing marsh and as such is likely to provide opportunities for enhancement.

Land off Pevensey Bay Road

- 3.10 Table 4 provides the Biodiversity Assessment for Land off Pevensey Bay Road.

Table 4. Land off Pevensey Bay Road Biodiversity Assessment

Parameter	Detail
Size (ha)	30 ha

Parameter	Detail
Developable Area (ha) ³⁷	14.6 ha
Indicative Quantum of Development ³⁸	375 dwellings
Priority Habitats (NERC S41 habitat)	The site includes priority habitat: Coastal and floodplain grazing marsh
Priority Species	Priority Species for targeting: Lapwing and redshank
Site Designations	Includes a portion (c. 10.4 ha) of Langney Levels LWS: The LWS is a network of drainage ditches rich in scarce waterside plants and clean water within an area of unimproved pasture and a broad water channel with rich flora, of note a red data species Sharp-leaved Pondweed. NB: site was formerly LWS E001 and E004.
Protected and Notable Species Within c.50m of the Site ³⁹	<p><u>Birds</u>: Six species are listed on the Birds Directive including Bar-tailed Godwit (<i>Limosa lapponica</i>), Glossy Ibis (<i>Plegadis falcinellus</i>), and Kingfisher (<i>Alcedo atthis</i>). Eight species of bird are listed on Schedule 1 Part 1 of the Wildlife and Countryside Act including Black Redstart (<i>Phoenicurus ochruros</i>), Cetti's Warbler (<i>Cettia cetti</i>), and Peregrine (<i>Falco peregrinus</i>). Ten species of birds are listed under NERC S41.</p> <p><u>Plants</u>: Fourteen notable and protected plant species including Fringed Water-lily (<i>Nymphoides peltata</i>) [Nat Scarce], Bloody Crane's-bill (<i>Geranium sanguineum</i>) [Red List ENG post2001 NT], Wall Bedstraw (<i>Galium parisiense</i>) [Red List GB post2001 VU, Red List ENG post2001 VU, Nat Scarce, Sussex Rare], Yellow-vetch (<i>Vicia lutea</i>) [Red List GB post2001 NT, Red List ENG post2001 VU, Nat Scarce, Sussex Rare], and Smith's Pepperwort (<i>Lepidium heterophyllum</i>) [Sussex Rare]</p> <p><u>Invertebrates</u>: includes one NERC S41 species Wall (<i>Lasiommata megera</i>). There are five other notable and protected invertebrates including Common Darter (<i>Sympetrum striolatum</i>) [Red List GB post2001 DD], Red-tipped Clearwing (<i>Synanthedon formicaeformis</i>) [Sussex Rare], Purse Web Spider (<i>Atypus affinis</i>) [Nat Scarce], A True Fly (<i>Campiglossa producta</i>) [Notable, Sussex Rare], and Four-lined Horsefly (<i>Atylotus rusticus</i>) [Nat Rare, Sussex Rare]</p> <p><u>Mammals</u>: West European Hedgehog (<i>Erinaceus europaeus</i>) [NERC S41, UK BAP Priority, Red List GB post2001 VU]</p>
Review of Aerial Images	From review of aerial imagery the site appears to include tussocked grassland, ditches, arable land (that appears wet) and hedgerows.

³⁷ Provided by Eastbourne Borough Council

³⁸ Provided by Eastbourne Borough Council

³⁹ Details provided by Sussex Biodiversity Records Centre

Parameter	Detail
EBC Lawton Recover Mapping Detail	Within the Eastbourne Marshes Biodiversity Opportunity Area
GCN Impact Risk Zone	Up to Green
Other constraints from desk study	The site includes c. 10.4 ha of the Langney Levels LWS.
BNG opportunities	The site is within the Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision.

Constraints

3.11 This site is less suitable to be utilised as a development site. The site is part of the wider Langney Levels LWS, and the habitats within the site (coastal and floodplain grazing marsh) are anticipated to fall within the definition of an S41 habitat. Development of this site will result in the loss of part of the LWS. At least as much new LWS type habitat will need to be created and designated to ensure no net loss of the LWS within Eastbourne.

3.12 The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy. This may include a reduction in the number of units deliverable within the site. Inevitably given the high level nature of this study other protected/notable species may be present and could impact the assessment. However, full protected species surveys would be required in any event to support a planning application.

Opportunities

3.13 The site contains c. 10.4 ha of Langney Levels LWS and is within Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision on site.

Sovereign Harbour Site 6

3.14 Table 5 provides the Biodiversity Assessment for Sovereign Harbour Site 6.

Table 5. Sovereign Harbour Site 6 Biodiversity Assessment

Parameter	Detail
Size (ha)	7.1 ha
Developable Area (ha) ⁴⁰	6 ha
Indicative Quantum of Development ⁴¹	7,000 sqm - 10,000 sqm office and retail

⁴⁰ Provided by Eastbourne Borough Council

⁴¹ Provided by Eastbourne Borough Council

Parameter	Detail
Priority Habitats (NERC S41 habitat)	The site includes priority habitat: Open Mosaic Habitat on Previously Developed Land.
Priority Species	Priority Species for targeting: Lapwing and redshank
Site Designations	None
Protected and Notable Species Within c.50m of the Site ⁴²	<p>Birds: Six species of bird are listed on the Birds Directive including Bar-tailed Godwit (<i>Limosa lapponica</i>), Glossy Ibis (<i>Plegadis falcinellus</i>), and Kingfisher (<i>Alcedo atthis</i>). Seven species of bird are listed on Schedule 1 Part 1 of the Wildlife and Countryside Act including Black Redstart (<i>Phoenicurus ochruros</i>), Bearded Tit (<i>Panurus biarmicus</i>) [WCA Sch1 Pt1 Notable Bird], and Peregrine (<i>Falco peregrinus</i>). Eight species of birds are listed under NERC S41.</p> <p>Invertebrates: Brown-Banded Carder Bee (<i>Bombus humilis</i>) [NERC S41, UK BAP Priority, Sussex Rare], Small Heath (<i>Coenonympha pamphilus pamphilus</i>) [NERC S41, UK BAP Priority, Red List GB post2001 NT], and Cinnabar (<i>Tyria jacobaeae</i>) [NERC S41, UK BAP Priority]</p> <p>Mammals: West European Hedgehog (<i>Erinaceus europaeus</i>) [NERC S41, UK BAP Priority, Red List GB post2001 VU]</p> <p>Invertebrates: two species are listed as NERC S41 species. These are Mullein Wave (<i>Scopula marginepunctata</i>) and Wall (<i>Lasiommata megera</i>). There are an additional 14 protected and notable invertebrates.</p> <p>Plants: There are five protected and notable plant species. These are Prickly Poppy (<i>Papaver argemone</i>) [Red List GB post2001 VU, Red List ENG post2001 EN], Sea-buckthorn (<i>Hippophae rhamnoides</i>) [Nat Scarce, Sussex Rare], Stinking Tutsan (<i>Hypericum hircinum</i>) [Sussex Rare], Suffocated Clover (<i>Trifolium suffocatum</i>) [Nat Scarce, Sussex Rare], Wood Small-reed (<i>Calamagrostis epigejos</i>) [Sussex Rare], Yellow Horned-poppy (<i>Glaucium flavum</i>) [Red List ENG post2001 NT].</p>
Habitats on site	From a review of aerial imagery and a brief site visit where the site was viewed from public land surrounding the site, the site contains a mosaic of shingle and scrub habitats. This land parcel is a brownfield site that was previously a landfill site. The gravel habitat within this has been deposited by man rather than natural processes. It is separated from dynamic coastal process of the nearby shingle along the coast (c 500m distant). The site includes priority habitat: Open Mosaic Habitat on Previously Developed Land
EBC Lawton Recover Mapping Detail	None
GCN Impact Risk Zone	White

⁴² Details provided by Sussex Biodiversity Records Centre

Parameter	Detail
Other constraints from desk study	The southern portion of the site is classed as 'Natural Areas' within the Eastbourne Open Space Assessment
BNG opportunities	Shingle is a rare habitat - although this land parcel is not noted as a Priority Habitat area on MAGIC. As a former land fill site that is now topped with gravel, this land parcel offers opportunities for enhancements. It is located approximately 500m from existing coastal shingle habitats.

Constraints

3.15 This site is potentially less suitable for development. The site includes NERC S41 habitat: Open Mosaic Habitat on Previously Developed Land. Black redstarts are recorded within the data search, and the shingle habitat provided within the site is potentially suitable to support this species. The data search returned results for other protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy. This may include a reduction in the developable area within the site. Inevitably given the high level nature of this study other protected/notable species may be present and could impact the assessment. However, full protected species surveys would be required in any event to support a planning application.

Opportunities

3.16 Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision on site. A further survey is suggested to assess the vegetation within the site as qualifying as a priority habitat, opportunities for appropriate habitat management for the rare habitat type to be eligible as a SAC Annex 1 qualifying habitat.

Land NE St Anthony's Hill

3.17 Table 6 provides the Biodiversity Assessment for Land NE St Anthony's Hill.

Table 6. Land NE St Anthony's Hill Biodiversity Assessment

Parameter	Detail
Size (ha)	1.2 ha
Developable Area (ha) ⁴³	1 ha
Indicative Quantum of Development ⁴⁴	35 dwellings
Priority Habitats (NERC S41 habitat)	The site includes priority habitat: Coastal and floodplain grazing marsh
Priority Species	Priority Species for targeting: Lapwing and redshank
Site Designations	The entirety of the site is part of the wider Eastbourne Park LWS: Large area of semi-natural habitat in the centre of

⁴³ Provided by Eastbourne Borough Council

⁴⁴ Provided by Eastbourne Borough Council

Parameter	Detail
	Eastbourne supporting high levels of biodiversity and notable flora and fauna
Protected and Notable Species Within c.50m of the Site ⁴⁵	<p><u>Birds</u>: A single species is listed under the Birds Directive: Little Egret (<i>Egretta garzetta</i>). Three species are listed on Schedule 1 Part 1 of the Wildlife and Countryside Act. These are Black Redstart (<i>Phoenicurus ochruros</i>), Cetti's Warbler (<i>Cettia cetti</i>), and Reed Bunting (<i>Emberiza schoeniclus</i>). Seven species are listed on NERC S41.</p> <p><u>Invertebrates</u>: A single species was noted: Common Darter (<i>Sympetrum striolatum</i>) [Red List GB post2001 DD].</p> <p><u>Plants</u>: Four protected and notable species were noted as follows: Dwarf Spurge (<i>Euphorbia exigua</i>) [Red List GB post2001 VU, Red List ENG post2001 VU], Ragged-Robin (<i>Silene flos-cuculi</i>) [Red List ENG post2001 NT], Sainfoin (<i>Onobrychis viciifolia</i>) [Red List GB post2001 VU, Red List ENG post2001 VU], Wild Strawberry (<i>Fragaria vesca</i>) [Red List ENG post2001]</p>
Review of Aerial Images	From a review of aerial imagery, the site appears to be grassland meadow that has been cut for hay.
EBC Lawton Recover Mapping Detail	Within the Eastbourne Marshes Biodiversity Opportunity Area
GCN Impact Risk Zone	Green
Other constraints from desk study	The entirety of the site is part of the wider Eastbourne Park LWS
BNG opportunities	The site is within the Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision

Constraints

3.18 This site is less suitable to be utilised as a development site. The site is part of the wider Eastbourne Park LWS, and the habitats within the site (coastal and floodplain grazing marsh) are anticipated to fall within the definition of a NERC S41 habitat. Development of this site will result in the loss of part of the LWS. At least as much new LWS type habitat will need to be created and designated to ensure no net loss of the LWS within Eastbourne.

3.19 The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy. This may include a reduction in the number of units deliverable within the site. Inevitably given the high level nature of this study other protected/notable species may be present and could impact the assessment. However, full protected species surveys would be required in any event to support a planning application.

⁴⁵ Details provided by Sussex Biodiversity Records Centre

Opportunities

3.20 The site is part of the wider Eastbourne Park LWS and the site is also within Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision on site.

Land in Southbourne

3.21 Table 7 provides the Biodiversity Assessment for Land in Southbourne.

Table 7. Land in Southbourne Biodiversity Assessment

Parameter	Detail
Size (ha)	32.2 ha
Developable Area (ha) ⁴⁶	16.3 ha
Indicative Quantum of Development ⁴⁷	25,000 sqm industrial & warehouse 85 homes
Priority Habitats (NERC S41 habitat)	30.3 ha of the site includes priority habitat: Coastal and floodplain grazing marsh and ancient woodland
Priority Species	Priority Species for targeting: Lapwing and Redshank
Site Designations	The entirety of the site is part of the wider Eastbourne Park LWS: A large area of semi-natural habitat in the centre of Eastbourne supporting high levels of biodiversity and notable flora and fauna
Protected and Notable Species Within c.50m of the Site ⁴⁸	<p><u>Birds</u>: Two species are listed on the Birds Directive: kingfisher (<i>Alcedo atthis</i>), and red kite (<i>Milvus milvus</i>). Four Birds are listed on Schedule 1 Part 1 of the Wildlife and Countryside Act. These include Kingfisher, Red Kite, Cetti's Warbler (<i>Cettia cetti</i>) and Firecrest (<i>Regulus ignicapilla</i>). Seven species are listed under NERC S41.</p> <p><u>Mammals</u>: West European Hedgehog (<i>Erinaceus europaeus</i>) [NERC S41].</p> <p><u>Invertebrates</u>: Three notable and protected species of invertebrates were identified as follows: Chalk Hill Blue (<i>Polyommatus coridon</i>) [WCA Sch5 s9.5a, Red List GB post2001 NT], A Beetle (<i>Drilus flavescens</i>) [Sussex Rare], Common Darter (<i>Sympetrum striolatum</i>) [Red List GB post2001 DD].</p> <p><u>Amphibians and Reptiles</u>: A single amphibian was recorded: Common Frog (<i>Rana temporaria</i>) [WCA Sch5 s9.5a].</p> <p><u>Plants</u>: Seven protected and notable plant species were recorded These include: Yellow-vetch (<i>Vicia lutea</i>) [Red List GB post2001 NT, Red List ENG post2001 VU, Nat Scarce, Sussex Rare], Tubular Water-dropwort (<i>Oenanthe fistulosa</i>) [NERC S41, UK BAP Priority, Red List GB post2001 VU, Red</p>

⁴⁶ Provided by Eastbourne Borough Council

⁴⁷ Provided by Eastbourne Borough Council

⁴⁸ Details provided by Sussex Biodiversity Records Centre

Parameter	Detail
	List ENG post2001 VU], and Chicory (<i>Cichorium intybus</i>) [Red List ENG post2001 VU].
Review of Aerial Images	A review of aerial mapping identifies cattle grazing, tussocky grassland and scrub within the site. The site also contains a river, Lottbridge Sewer.
EBC Lawton Recover Mapping Detail	Located within the Eastbourne Marshes BOA
GCN Impact Risk Zone	Up to Red
Other constraints from desk study	A portion of the site is classed as 'Natural Areas' within the Eastbourne Open Space Assessment
BNG opportunities	The site is within the Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision
Other opportunities	Land parcel EP32 is owned by Eastbourne Borough Council and is a former landfill site.

Constraints

3.22 This site is less suitable to be utilised as a development site. The site is part of the wider Eastbourne Park LWS, and the habitats within the site (coastal and floodplain grazing marsh) are anticipated to fall within the definition of a NERC S41 habitat. Development of this site will result in the loss of part of the LWS. At least as much new LWS type habitat will need to be created and designated to ensure no net loss of the LWS within Eastbourne.

3.23 The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy. This may include a reduction in the number of units deliverable within the site. Inevitably given the high level nature of this study other protected/notable species may be present and could impact the assessment. However, full protected species surveys would be required in any event to support a planning application.

Opportunities

3.24 The site is part of the wider Eastbourne Park LWS and the site is also within Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision on site. A portion of the site is classed as 'Natural Areas' within the Eastbourne Open Space Assessment. Land parcel EP32 is owned by Eastbourne Borough Council.

Former Gas Works, Finmere Road

3.25 Table 8 provides the Biodiversity Assessment for Former Gas Works, Finmere Road.

Table 8. Former Gas Works, Finmere Road Biodiversity Assessment >

Parameter	Detail
Size (ha)	4.2 ha
Developable Area (ha) ⁴⁹	4.2 ha
Indicative Quantum of Development ⁵⁰	10,000sqm employment
Priority Habitats (NERC S41 habitat)	None
Priority Species	None
Site Designations	None on site, but immediately adjacent to Crumbles and Horsey Sewer LWS.
Protected and Notable Species Within c.50m of the Site ⁵¹	Birds: A single species noted is listed on the Bird Directive: Red Kite (<i>Milvus milvus</i>). A single species noted is listed on Schedule 1 Part 1 of the Wildlife and Countryside Act: Cetti's Warbler (<i>Cettia cetti</i>). Four Birds are listed on NERC S41.
Review of Aerial Images	From a review of aerial imagery, the site appears to be hard standing with structures associated with the gas depot. The site does not appear to be significantly overgrown and thus a brownfield site that could be important to biodiversity. The site is the disused Southern Gasworks Eastbourne Depot.
EBC Lawton Recover Mapping Detail	None
GCN Impact Risk Zone	Green
Other constraints from desk study	None
BNG opportunities	This site is likely to be of low value and as such has a greater potential for habitat enhancements. However, this site may be better placed to provide development rather than BNG capacity.

Constraints

3.26 The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy. Inevitably given the high level nature of this study other protected/notable species may be present and could impact the assessment. However, full protected species surveys would be required in any event to support a planning application.

⁴⁹ Provided by Eastbourne Borough Council

⁵⁰ Provided by Eastbourne Borough Council

⁵¹ Details provided by Sussex Biodiversity Records Centre

Opportunities

3.27 This site is more suitable to be utilised as a development site. The site is a disused Southern Gasworks Eastbourne Depot. From a review of aerial imagery, the site appears to be hard standing with structures associated with the gas depot. The site does not appear to be significantly overgrown and thus a brownfield site that could be important to biodiversity.

3.28 This site is likely to be of low value and as such has a greater potential for habitat enhancements. However, this site may be better placed to provide development rather than on site BNG capacity.

Sussex Downs College

3.29 Table 9 provides the Biodiversity Assessment for Sussex Downs College.

Table 9. Sussex Downs College Biodiversity Assessment

Parameter	Detail
Size (ha)	14.3 ha
Developable Area (ha) ⁵²	12.4 ha
Indicative Quantum of Development ⁵³	OC08 - 245 homes OR 117 homes, 160 care apartments and 1,800 sqm retail
Priority Habitats (NERC S41 habitat)	None
Priority Species	None
Site Designations	None
Protected and Notable Species Within c.50m of the Site ⁵⁴	Birds: A single species is listed under the Birds Directive: Red Kite (<i>Milvus milvus</i>). Three species are listed on Schedule 1 Part 1 of the Wildlife and Countryside Act. These are Red Kite, Redwing (<i>Turdus iliacus</i>), and Fieldfare (<i>Turdus pilaris</i>). Five species are listed on NERC S41. Bats: A single bat species was recorded: Noctule Bat (<i>Nyctalus noctule</i>) [Hab Dir A4, Hab Reg Sch2, WCA Sch5 s9.4b/s9.4c/s9.5a, NERC S41, UK BAP Priority].
Review of Aerial Images	A review of aerial imagery of the site shows buildings and playing fields/ recreational open spaces with scattered trees.
EBC Lawton Recover Mapping Detail	None
GCN Impact Risk Zone	Up to Orange
Other constraints from desk study	None

⁵² Provided by Eastbourne Borough Council

⁵³ Provided by Eastbourne Borough Council

⁵⁴ Details provided by Sussex Biodiversity Records Centre

Parameter	Detail
BNG opportunities	1.9 ha of the site is not considered developable due to retention of the existing college buildings. As such there are expected to be limited opportunities for on-site BNG enhancements. The existing habitats on site are not considered to be of high biodiversity value, and as such this site is likely to be more suitable for development.

Constraints

3.30 The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy. Inevitably given the high level nature of this study other protected/notable species may be present and could impact the assessment. However, full protected species surveys would be required in any event to support a planning application.

Opportunities

3.31 1.9 ha of the site is not considered developable due to retention of the existing college buildings. As such there are expected to be limited opportunities for on-site BNG enhancements. The existing habitats on site are not considered to be of high biodiversity value, and as such this site is likely to be more suitable for development

Land off Tutts Barn Lane

3.32 Table 10 provides the Biodiversity Assessment for Land off Tutts Barn Lane.

Table 10. Land off Tutts Barn Lane Biodiversity Assessment

Parameter	Detail
Size (ha)	11.5
Developable Area (ha) ⁵⁵	9.1
Indicative Quantum of Development ⁵⁶	270 dwellings
Priority Habitats (NERC S41 habitat)	c. 6.78 ha are identified as priority habitat: Coastal and floodplain grazing marsh and 3.81ha of Open Mosaic Habitats on Previously Developed Land
Priority Species	Priority Species for targeting: Lapwing and redshank
Site Designations	None within the site, however land to the north of Tutts Barn Lane adjacent to the site is identified as Eastbourne Park LWS.
Species Within c.50m of the Site ⁵⁷	<u>Bats</u> : Five species that are listed in the Habitats Regulations, Wildlife and Countryside Act and NERC S41 are Common

⁵⁵ Provided by Eastbourne Borough Council

⁵⁶ Provided by Eastbourne Borough Council

⁵⁷ Details provided by Sussex Biodiversity Records Centre

Parameter	Detail
	<p>Pipistrelle (<i>Pipistrellus pipistrellus</i>), Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>), Nathusius's Pipistrelle (<i>Pipistrellus nathusii</i>), Myotis Bat (<i>Myotis sp.</i>), and Noctule Bat (<i>Nyctalus noctula</i>).</p> <p><u>Birds</u>: Two bird species are listed under the Birds Directive: Red Kite (<i>Milvus milvus</i>) and Short-eared Owl (<i>Asio flammeus</i>). Six species are listed on Schedule 1 Part 1 of the Wildlife and Countryside Act. These are Black Redstart (<i>Phoenicurus ochruros</i>), Barn Owl (<i>Tyto alba</i>), Serin (<i>Serinus serinus</i>), Red Kite and Short-eared Owl. Four species are listed in NERC S41.</p> <p><u>Invertebrates</u>: A single species is listed on Schedule 1 Part 5 of the Wildlife and Countryside Act: Chalk Hill Blue (<i>Polyommatus coridon</i>). Three species are listed in NERC S41: Cinnabar (<i>Tyria jacobaeae</i>), Common Fan-foot (<i>Pechipogo strigilata</i>), and Feathered Gothic (<i>Tholera decimalis</i>)</p> <p><u>Other mammals</u>: West European Hedgehog (<i>Erinaceus europaeus</i>) [NERC S41].</p> <p><u>Amphibians and Reptiles</u>: Four species are listed in both the Wildlife and Countryside ACT and also NERC S41: Common Toad (<i>Bufo bufo</i>), Common Lizard (<i>Zootoca vivipara</i>), Grass Snake (<i>Natrix Helvetica</i>) and, Slow-worm (<i>Anguis fragilis</i>).</p> <p><u>Plants</u>: There is a single species in NERC S41: Grape-hyacinth (<i>Muscari neglectum</i>). Other rare and notable plants are Broad-leaved Spurge (<i>Euphorbia platyphyllos</i>) [Sussex Rare], Broad-leaved Osier (<i>Salix viminalis x caprea = S. x smithiana</i>) [Sussex Rare], Four-leaved Allseed (<i>Polycarpon tetraphyllum</i>) [Nat Rare], Sussex Yellow-sorrel (<i>Oxalis dillenii</i>) [Sussex Rare].</p>
Review of Aerial Images	A review of aerial imagery of the site appears to show a mix of brownfield and greenfield: disused railway sidings, grazed land, scrub, hedgerows, tall unmanaged grassland and vegetation, buildings, and hardstanding.
EBC Lawton Recover Mapping Detail	Within the Eastbourne Marshes Biodiversity Opportunity Area. The Priority habitat is also noted as 'S41 Habitats - "Assets at Risk (NCIS)'
GCN Impact Risk Zone	Up to Green
Other constraints from desk study	None
BNG opportunities	c. 2.4 ha of the site is not identified as being developable. This land could be utilised for BNG opportunities. The NERC S41 habitat on site is noted to be 'at Risk' and as such, opportunities to enhance this habitat could be taken as part of development on site.

Constraints

3.33 Part of the site may be more suitable to be utilised as a development site; however, it is noted that c. 6.8ha of the site is coastal and floodplain grazing

marsh and c. 3.81ha is open mosaic habitat on previously developed land (which are NERC S41 habitat). In addition land parcels UP03 and EP36 are brownfield sites that have the potential to be of biodiversity value.

3.34 The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy. This may include a reduction in the number of units deliverable within the site. Inevitably given the high level nature of this study other protected/notable species may be present and could impact the assessment. However, full protected species surveys would be required in any event to support a planning application.

Opportunities

3.35 The site is within Eastbourne Marshes BOA. The Priority habitat is also noted as 'S41 Habitats - "Assets at Risk (NCIS)'. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision. Land parcel UP03 is owned by Eastbourne Borough Council.

Summerdown Playing Field

3.36 Table 11 provides the Biodiversity Assessment for Summerdown Playing Field.

Table 11. Summerdown Playing Field Biodiversity Assessment

Parameter	Detail
Size (ha)	2 ha
Developable Area (ha) ⁵⁸	2 ha
Indicative Quantum of Development ⁵⁹	35 dwellings
Priority Habitats (NERC S41 habitat)	None
Priority Species	Priority Species for targeting: Lapwing and redshank
Site Designations	Sports field (restricted)
Protected and Notable Species Within c.50m of the Site ⁶⁰	<u>Birds</u> : Three species of bird are in NERC S41: Herring Gull (<i>Larus argentatus</i>), Spotted Flycatcher (<i>Muscicapa striata</i>), and House Sparrow (<i>Passer domesticus</i>) [<u>Plants</u> : Field Scabious (<i>Knautia arvensis</i>) [Red List ENG post2001 NT], Hoary Plantain (<i>Plantago media</i>) [Red List ENG post2001 NT], Quaking-grass (<i>Briza media</i>) [Red List ENG post2001 NT], Strawberry Clover (<i>Trifolium fragiferum</i>) [Red List GB post2001 VU, Red List ENG post2001 VU]

⁵⁸ Provided by Eastbourne Borough Council

⁵⁹ Provided by Eastbourne Borough Council

⁶⁰ Details provided by Sussex Biodiversity Records Centre

Parameter	Detail
Review of Aerial Images	A review of aerial imagery of the site shows amenity grassland associated with sports pitches, and hardstanding tennis courts.
EBC Lawton Recover Mapping Detail	Within B-Lines (Buglife) A small portion of the site is identified as 'High Chalk Grassland Potential' however, in reality, this is unlikely as the site comprises sports pitches. It is likely that the site has been identified as 'High Chalk Grassland Potential' due to the large size of the pixels/ polygons used to identify this classification.
GCN Impact Risk Zone	Up to Green
Other constraints from desk study	The site is located immediately adjacent to the South Downs National Park (Royal Eastbourne Golf Club)
BNG opportunities	Whilst this site is well suited to development due to the lack of notable habitats on site, this site could also provide BNG opportunities if needed via habitat enhancement and / or creation.

Constraints

3.37 This site is more suitable to be utilised as a development site due to the lack of ecological habitat value on site.

3.38 The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy. This may include a reduction in the number of units deliverable within the site. Inevitably given the high level nature of this study other protected/notable species may be present and could impact the assessment. However, full protected species surveys would be required in any event to support a planning application.

Opportunities

3.39 Whilst this site is well suited to development due to the lack of notable habitats on site, this site could also provide BNG opportunities if needed via habitat enhancement and / or creation.

Conclusions

3.40 The following table (Table 12) is a brief summary of the suitability of the Sites currently being considered for allocation.

3.41 Where a site is coloured green it is considered 'more suitable' for development because the review of online data suggests it does not contain any NERC S41 habitats or LWS designation which should either be preserved or any loss compensated for by provision of replacement habitat (adding to BNG requirements). The data search identified that the site is less constrained by the potential presence of protected and/or notable species that would otherwise require further investigation and potential avoidance, mitigation and/or compensation.

- 3.42 Where the site is coloured orange it is considered ‘less suitable’ for development because it is potentially constrained by the presence of NERC S41 habitats and/or existing wildlife designations or is more likely to pose significant protected species constraints based on suitable habitat and available desk-study records. The presence of S41 habitats and, particularly, a LWS designation, could cause difficulties with development detailed design and might ultimately reduce site capacity. However, it is unlikely to render a site entirely undeliverable provided adequate compensation could be secured off-site. LWS are identified and selected locally using agreed criteria and detailed ecological surveys as set out in DEFRA’s 2006 guidance⁶¹ and as such the creation of new ‘LWS standard’ habitat will have to adhere to the predefined selection criteria.
- 3.43 Where a site is coloured red it is considered ‘unsuitable’ for development due to the presence of national or international nature designations. None of the sites are coloured red.
- 3.44 At this early stage, it is not possible to identify exactly what enhancements or mitigation may be required for each site if it were to be brought forward as an allocation. Detailed habitat quality surveys and masterplanning for each site would be required for all ‘less suitable’ sites to inform any avoidance and / or mitigation strategy. It should be noted that where a S41 Habitat is present, this should be preserved, and if this is not possible it should be compensated for by comparable habitat creation elsewhere. The loss of any LWS would also need to be adequately compensated for.

Table 12 Biodiversity Assessment Conclusions

Site for Biodiversity Assessment Overall Site Suitability for Development

<p>Land at Larkspur Drive</p>	<p>This small site is less suitable to be utilised as a development site. The site is part of the wider Eastbourne Park LWS, and the habitats within the site (coastal and floodplain grazing marsh) are anticipated to fall within the definition of a NERC S41 habitat. This site also falls within a red impact risk zone for GCN. This site has previously been used as a receptor site for reptiles for other developments within the area. Reptiles should be a consideration for any development plans put forward.</p> <p>Development of this site will result in the loss of part of the LWS. At least as much new LWS type habitat will need to be created and designated to ensure no net loss. If this isn’t possible then this site should not be taken forward.</p> <p>Due to the sites proximity to Eastbourne Park LWS and Eastbourne Marshes BOA this site is likely to be better suited to provide BNG capacity than development.</p>
<p>Land at East Langney Levels</p>	<p>This site is less suitable to be utilised as a development site. The site is part of the wider Langney Levels LWS, and the habitats</p>

⁶¹ Available at [Local Sites - guidance on their identification, selection and management \(lws-sussex.org.uk\)](https://www.lws-sussex.org.uk) [accessed 07/07/2023]

	<p>within the site (coastal and floodplain grazing marsh) are anticipated to fall within the definition of a NERC S41 habitat.</p> <p>Development of this site will result in the loss of part of the LWS. At least as much new LWS type habitat will need to be created and designated to ensure no net loss. However, the site contains c. 9.6 ha of Langney Levels LWS and is within Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site (or part thereof) could potentially be enhanced to provide BNG provision. It is understood that the land parcel LA37 within the LWS and BOA is owned by Eastbourne Borough Council.</p> <p>The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy.</p>
<p>Land off Pevensey Bay Road</p>	<p>This site is less suitable to be utilised as a development site. The site is part of the wider Langney Levels LWS, and the habitats within the site (coastal and floodplain grazing marsh) are anticipated to fall within the definition of a NERC S41 habitat.</p> <p>Development of this site will result in the loss of part of the LWS. At least as much new LWS type habitat will need to be created and designated to ensure no net loss.</p> <p>The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy.</p> <p>The site contains c. 10.4 ha of Langney Levels LWS and is within Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision. Depending on the presence of a priority habitat, appropriate management could lead to a significant improvement in the habitat quality.</p>
<p>Sovereign Harbour Site 6</p>	<p>This site is potentially less suitable for development. The site includes NERC S41 Habitat: Open Habitat Mosaic on Previously Developed Land.</p> <p>Black redstarts are recorded within the data search, and the shingle habitat provided within the site is potentially suitable to support this species. The data search returned results for other protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site.</p>

	<p>Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision.</p>
<p>Land NE St Anthony's Hill</p>	<p>This site is less suitable to be utilised as a development site. The site is part of the wider Eastbourne Park LWS, and the habitats within the site (coastal and floodplain grazing marsh) are anticipated to fall within the definition of a NERC S41 habitat.</p> <p>Development of this site will result in the loss of part of the LWS. At least as much new LWS type habitat will need to be created and designated to ensure no net loss. If this is not possible this site should not be taken forward.</p> <p>The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy.</p> <p>The site is part of the wider Eastbourne Park LWS and the site is also within Eastbourne Marshes BOA. This site could potentially be enhanced to provide BNG provision. Depending on the presence of a priority habitat, appropriate management could lead to a significant improvement in the habitat quality.</p>
<p>Land in Southbourne</p>	<p>This site is less suitable to be utilised as a development site. The site is part of the wider Eastbourne Park LWS, and the habitats within the site (coastal and floodplain grazing marsh) are anticipated to fall within the definition of a NERC S41 habitat.</p> <p>Development of this site will result in the loss of part of the LWS. At least as much new LWS type habitat will need to be created and designated to ensure no net loss.</p> <p>The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy.</p> <p>The site is located within Eastbourne Marshes BOA. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision. A portion of the site is classed as 'Natural Areas' within the Eastbourne Open Space Assessment. Land parcel EP32 is owned by Eastbourne Borough Council. Depending on the presence of a priority habitat, appropriate management could lead to a significant improvement in the habitat quality.</p>

Former Gas Works, Finmere Road	<p>This site is more suitable to be utilised as a development site. The site is a disused Southern Gasworks Eastbourne Depot. The site does not appear to be significantly overgrown and thus a brownfield site that could be important to biodiversity.</p>
Sussex Downs College	<p>The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy.</p> <p>1.9 ha of the site is not considered developable. It may be that this area could provide an opportunity for BNG enhancements. The existing habitats on site are not considered to be of high biodiversity value, and as such this site may be more suitable for development</p>
Land off Tutts Barn Lane	<p>This site is more suitable to be utilised as a development site, however, c. 6.8ha of the site is coastal and floodplain grazing marsh and c. 3.81ha is open mosaic habitat on previously developed land (which are NERC S41 habitat). In addition land parcels UP03 and EP36 are brownfield sites that have the potential to be of biodiversity value.</p> <p>The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site, however, their presence will require considerable consideration in the master-planning and ecological avoidance and mitigation strategy.</p> <p>The site is within Eastbourne Marshes BOA. The Priority habitat is also noted as 'S41 Habitats - "Assets at Risk (NCIS)'. Depending on the quality of the existing habitats within the site, this site could potentially be enhanced to provide BNG provision. Land parcel UP03 is owned by Eastbourne Borough Council.</p>
Summerdown Playing Field	<p>This site is more suitable to be utilised as a development site due to the lack of ecological habitat value on site.</p> <p>The data search returned results for protected and notable species. It is not anticipated that the presence of any of these species would pose deliverability issues with regard to the site.</p> <p>Whilst this site is well suited to development due to the lack of notable habitats on site, this site could also provide BNG opportunities if needed via habitat enhancement and / or creation.</p>

3.45 In summary, the following sites are considered to be more suitable for development, at least in part:

- Former Gas Works, Finmere Road

- Sussex Downs College
- Land off Tutts Barn Lane
- Summerdown Playing Field

3.46 The following sites are considered to be less suitable for development and contain constraints that may materially limit development potential:

- Land at Larkspur Drive
- Land at East Langney Levels
- Land off Pevensey Bay Road
- Sovereign Harbour Site 6
- Land NE St Anthony's Hill
- Land in Southbourne

3.47 No sites are considered 'unsuitable' at this stage.

3.48 Prior to any of these sites being taken forward, it is recommended that a full suite of ecological surveys are undertaken by the site promotor to help inform any proposed development. This includes (but is not limited to) Phase 1/ HabsUK habitat surveys and protected species surveys.

Biodiversity Net Gain

3.49 This section details the Biodiversity Metric 3.1 calculations for each development typology. Linear features were not included within this assessment as it was assumed that linear features such as hedgerows and ditches if present would be retained within the development. Linear features such as ditches and hedgerows can significantly affect the BNG calculations. However, since there is no information regarding at this stage how linear features would be handled for any allocated site it was considered that attempting to include them at this stage would further add to the assumptions needed without a site masterplan without adding much benefit to the broad analysis undertaken. This will therefore need reviewing (as will all the BNG calculations) when planning applications with site masterplans are available.

3.50 Biodiversity net gains of a net 10% or more are concluded for each site in Table 33.

Small Greenfield Residential

3.51 This small greenfield residential site was broadly based on St Anthony's Hill land parcel.

3.52 For this assessment two different off-site scenarios were calculated. The first is to enhance existing Grassland: Floodplain Wet Mosaic (CFGM) to a better condition. The output of this calculation is an area of this habitat that will need to be improved. This scenario would not meet Metric 3.1's strict 'Trading Rules'. As detailed in Table 13, the Metric requires that where Floodplain Wet Mosaic is lost, this needs to be replaced with the same habitat, rather than simply other habitats that amount to the necessary number of credits to demonstrate BNG.

3.53 For comparison, a second scenario has been calculated in order to identify the number of off-site credits that would be required, without specific reference to the constraints imposed by the Metric Trading Rules. This will enable a typical total quantum of off-site BNG provision to be calculated. For this second scenario, the habitat 'Other Neutral Grassland' was chosen for off-site provision. By providing this scenario, the calculation also enables comparisons with the subsequent typologies.

On-Site Baseline Habitat Units

3.54 Table 13 identifies the baseline habitat area, habitat units and BNG parameters (condition etc.) within a small greenfield residential site of 1.2 ha in size, with potential to deliver c 35 dwellings.

Table 13. Baseline Area-Based Habitats and Calculations

Habitat (UKHab)	type	Area to be Lost (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units	Suggested action to address habitat losses
Grassland: Floodplain Mosaic (CFGM)	Wet	1.2	High	Moderate	High	16.56	Same habitat required
Total		1.2	-	-	-	16.56	-

Post-Development

3.55 Due to the small nature of this site, it is assumed that all habitats within the site will be lost as part of the development (i.e. 100%). To ensure a minimum of a 10% BNG (i.e. that there is an improvement of at least 18.22 units), off-site habitat provision will be required.

Off-Site Baseline Habitat Units (Other Neutral Grassland)

3.56 To provide consistency with the other typologies this scenario provides Other Neutral Grassland as the off-site habitat provision. It should be noted that this is a hypothetical scenario for purposes of reference. Table 14 shows the baseline habitat area within a hypothetical grassland location within the Borough.

Table 14. Off-Site Area-Based Habitat Baseline (Other Neutral Grassland)

Habitat type (UKHab)	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units pre enhancement
Grassland: grassland	Other neutral 4.15	Medium	Moderate	Low strategic significance	33.20
Total	4.15	-	-	-	33.20

3.57 Table 15 shows the off-site post-enhancement other neutral grassland habitat provision, it shows the change in habitat condition, keeping the distinctiveness as Medium but increasing the condition from Moderate to Good.

Table 15 Off-Site Post-Enhancement Area-Based Habitats

Habitat type (UKHab)			Area (ha)	Distinctiveness Change	Condition Change	Strategic significance	Habitat Units post enhancement
Grassland:	Other	neutral	4.15	Medium-Medium	Moderate - Good	Low strategic significance	51.55
Total			4.15	-	-	-	51.55

3.58 Therefore, improving the condition of 4.15ha of neutral grassland from moderate condition to good condition would result in a net improvement of 18.35 units.

Summary

3.59 All baseline habitats and habitats created are present within the accompanying metric assessment for the Proposed Development (Appendix F).

3.60 The loss of 1.2 ha of Grassland: Floodplain Wet Mosaic (CFGM) (a NERC Section 41 habitat) will result in the loss of 16.56 Habitat Units. To replace the loss of this habitat off-site habitat creation/ enhancement is identified. It is assumed that the replacement habitat will be within the Eastbourne Borough Council's boundary, thus ensuring the off-site provision is within the lowest Spatial Risk Category (Compensation inside LPA or NCA, or deemed to be sufficiently local, to the site of biodiversity loss). Enhancement of 4.15 ha of Grassland: Neutral Other Grassland from moderate to good condition, as identified in Table 15, will result in a 10.80% net percentage change (18.35 units compared to 18.22 units needed for 10% BNG). **Therefore, it can crudely be assumed that to achieve 10% BNG for a typical 'small greenfield residential' site, approximately 4-5ha of grassland offsite would need to be enhanced.**

3.61 Limitations As introduced within the Methodology chapter, Biodiversity Net Gain does not simply require the relevant number of credits to be achieved but also has a series of Trading Rules. This is because it is not considered appropriate to replace a strategically significant habitat (such as Habitats of Principal Importance), with a lesser habitat, even if the lesser habitat is enhanced to be in the best condition possible. The BNG Metric identifies that the loss of the Grassland: Floodplain Wet Mosaic (CFGM) will need to be replaced with the same habitat of equal or better condition. Therefore, since the habitat on this particular site is floodplain grazing marsh, the same habitat elsewhere would need to be enhanced. This Metric 3.1 calculation is undertaken below.

Off-Site Baseline Habitat (Floodplain Wet Mosaic (CFGM))

3.62 The habitat Grassland: Floodplain Wet Mosaic (CFGM) has specific hydrological conditions that are crucial to its function. As such, off-site provision would need to be located within similar hydrological conditions and habitats would need to be created or enhanced thus. In this example, it is suggested that land within the flood plain within Eastbourne is used, such as within Eastbourne Park. Table 16 shows the baseline habitat area within a hypothetical off-site location for BNG provision (likely to be within Eastbourne Park).

Table 16. Off-Site Area-Based Habitat Baseline (Floodplain Wet Mosaic (CFGM) Scenario)

Habitat type (UKHab)	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units pre enhancement
Grassland: Floodplain Mosaic (CFGM)	Wet 3.15	High	Moderate	High strategic significance	37.80
Total	3.15	-	-	-	37.80

3.63 Table 17 shows the off-site post-enhancement Floodplain Wet Mosaic habitat provision. It shows the change in habitat condition, keeping the distinctiveness as High but increasing the condition from Moderate to Good.

Table 17 Off-Site Post-Enhancement Area-Based Habitats

Habitat type (UKHab)	Area (ha)	Distinctiveness Change	Condition Change	Strategic significance	Habitat Units post enhancement
Grassland: Floodplain Mosaic (CFGM)	Wet 3.15	High-High	Moderate - Good	High strategic significance	56.10
Total	3.15	-	-	-	56.10

3.64 Therefore, improving the condition of 3.15ha of floodplain wet mosaic grassland from moderate to good would result in an improvement of 18.30 units.

Summary

3.65 The loss of 1.2 ha of Grassland: Floodplain Wet Mosaic (CFGM) (a NERC Section 41 habitat) will result in the loss of 16.56 Habitat Units. To replace the loss of this habitat off-site habitat creation/ enhancement is identified. It is assumed that the replacement habitat will be within the Eastbourne Borough Council's boundary, thus ensuring the off-site provision is within the lowest Spatial Risk Category (Compensation inside LPA or NCA, or deemed to be sufficiently local, to the site of biodiversity loss). Enhancement of 3.15 ha of Grassland: Floodplain Wet Mosaic (CFGM) as identified in Table 17 will result in a 10.5% net percentage change (i.e. 18.30 units compared to 18.22 units for 10% BNG).

3.66 **Therefore, it can crudely be assumed that to achieve at least 10% BNG for a typical 'small greenfield residential' site, approximately 3.15ha of Grassland: Floodplain Wet Mosaic (CFGM) offsite would need to be enhanced, as identified in Table 17.**

Large Greenfield Residential

3.67 This large greenfield residential site was broadly based on Land at East Langney Levels.

On-Site Baseline Habitat Units

3.68 Table 18 identifies the baseline habitat area habitat units and BNG parameters (condition etc.) within a large greenfield residential site of 17.4 ha in size. with potential to deliver c. 212 homes within 9.5 ha of the site.

Table 18. Baseline Area-Based Habitats

Habitat (UKHab)	type	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units	Suggested action to address habitat losses
Grassland: Floodplain Wetland Mosaic (CFGM)		3	High	Fairly Good	High strategic significance	63.83	Same habitat required
Grassland: Floodplain Wetland Mosaic (CFGM)		4.5	High	Poor	High strategic significance	35.19	Same habitat required
Grassland: Floodplain Wetland Mosaic (CFGM)		8	High	Moderate	High strategic significance	118.68	Same habitat required
-		17.4	-	-	-	217.70	-

Post-Development

3.69 Approximately 7.9 ha of habitats (Grassland: Floodplain Wetland Mosaic (CFGM)) will be retained and enhanced on-site. The change in the amount of on-site habitat that is to be retained and enhanced is detailed in Table 19.

Table 19 On-Site Post-Enhancement Area-Based Habitats

Habitat type (UKHab)	Area (ha)	Distinctiveness Change	Condition Change	Strategic significance	Habitat Units Delivered following enhancement
Grassland: Floodplain Wetland Mosaic (CFGM)	7.9	High-High	Moderate - Good	High strategic significance	140.69
Total	7.9	-	-	-	140.69

3.70 It can be seen that even with the provision of 7.9 ha of enhanced Grassland: Floodplain Wetland Mosaic (CFGM) on site, this results in a Biodiversity Net Gain of -35.37% $\left(\frac{140.69 - 217.70}{217.70} \times 100\right)$. In other words a further 98.77 units would need to be achieved to offset the loss of units on site and achieve 10% BNG. As such, to achieve a positive 10% BNG, additional off-site BNG provision will also be required. See Appendix C for full calculations.

Off-Site Baseline Habitat Units (Other Neutral Grassland)

3.71 To provide consistency with the other typologies this scenario provides Other Neutral Grassland as the off-site habitat provision. As previously detailed, this is a hypothetical scenario for purposes of reference. The Metric 3.1 calculator identifies that to be in accordance with its 'Trading Rules' certain existing habitats

that are to be lost will require replacement with similar habitats of equal or better distinctiveness and/ or condition (full details are shown in Table 20 to provide the 10% BNG. As such, the following provision will not satisfy the Trading Rules, but is illustrative of how much off site habitat provision may be required for BNG provision for this typology.

3.72 Table 20 Table 20 shows the baseline habitat area within a hypothetical grassland location located within the Borough.

Table 20. Off-Site Area-Based Habitat Baseline (Other Neutral Grassland)

Habitat type (UKHab)			Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units pre enhancement
Grassland:	Other	neutral	36	Medium	Moderate	Low strategic significance	288.00
Total			36	-	-	-	288.00

3.73 Table 21 shows the off-site post-enhancement other neutral grassland habitat provision. It shows the change in habitat condition, keeping the distinctiveness as Medium but increasing the condition from Moderate to Good.

Table 21 Off-Site Post-Enhancement Area-Based Habitats

Habitat type (UKHab)			Area (ha)	Distinctiveness Change	Condition Change	Strategic significance	Habitat Units post enhancement
Grassland:	Other	neutral	36	Medium-Medium	Moderate - Good	Low strategic significance	388.84
Total			36	-	-	-	388.84

3.74 Therefore, improving the condition of 36ha of neutral grassland from moderate to good would result in an improvement of 100.84 units.

Summary

3.75 All baseline habitats and habitats created are present within the accompanying metric assessment for the Proposed Development (Appendix C).

3.76 The loss of 9.5 ha of greenfield typology habitats will result in the loss of 217.7 Habitat Units. To replace the loss of the greenfield type habitats, both on-site and off-site habitat enhancement is identified. It is assumed that the replacement habitat will be within the Eastbourne Borough Council's boundary, thus ensuring the off-site provision is within the lowest Spatial Risk Category (Compensation inside LPA or NCA, or deemed to be sufficiently local, to the site of biodiversity loss).

3.77 Enhancement of 7.9 ha of Grassland: Floodplain Wetland Mosaic (CFGM) on site from Moderate to Good condition, and the enhancement of c 36 ha of Grassland: Neutral Other Grassland off-site from Moderate to Good condition, will result in a 10.95% net percentage change (100.84 units compared to 98.77 units for 10% BNG). **Therefore, it can crudely be assumed that to achieve 10% BNG for a typical 'large greenfield residential' site, approximately 8 ha to 9 ha of Grassland: Floodplain Wetland Mosaic (CFGM) on-site will need**

to be enhanced and a further 36 ha to 44 ha of grassland offsite would need to be enhanced.

3.78 It should be noted that in practice Biodiversity Net Gain does not simply require the relevant number of credits to be achieved but also has a series of Trading Rules. This is because it is not considered appropriate to replace a strategically significant habitat (such as Habitats of Principal Importance), with a lesser habitat, even if the lesser habitat is enhanced to be in the best condition possible. Linear features such as ditches and hedgerows can significantly affect the BNG calculations. However, since there is no information regarding at this stage how linear features would be handled for any allocated site it was considered that attempting to include them at this stage would further add to the assumptions needed without a site masterplan without adding much benefit to the broad analysis undertaken. This will therefore need reviewing (as will all the BNG calculations) when planning applications with site masterplans are available.

Small Brownfield Residential

3.79 The small brownfield residential site is loosely based on brownfield land within the Land off Tutts Barn Lane site.

On-Site Baseline Habitat Units

3.80 Table 22 identifies the baseline habitat area, habitat units and BNG parameters (condition etc.) within a 'typical' small brownfield residential site of 2.0 ha in size allocated to deliver c. 70 dwellings.

Table 22. Baseline Area-Based Habitats

Habitat (UKHab)	type	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units	Suggested action to address habitat losses
Urban: Open Habitats Previously Developed Land	Mosaic on	0.3	High	Moderate	Low Strategic Significance	3.60	Same habitat required
Urban: unvegetated, unsealed surface	Artificial	0.5	V.Low	N/A - Other	Low Strategic Significance	0.00	Compensation Not Required
Heathland and shrub: Mixed scrub		0.3	Medium	Poor	Low Strategic Significance	1.20	Same broad habitat or a higher distinctiveness habitat required (\geq)
Urban: Vacant/derelict land/ bareground		0.4	Low	Poor	Low Strategic Significance	0.80	Same distinctiveness or better habitat required \geq
Urban: Developed land; sealed surface		0.1	V.Low	N/A - Other	Low Strategic Significance	0.00	Compensation Not Required
Sparsely vegetated land: Ruderal/Ephemeral		0.4	Low	Moderate	Low Strategic Significance	1.60	Same distinctiveness or better habitat required \geq

3.87 It should be noted that in practice Biodiversity Net Gain does not simply require the relevant number of credits to be achieved but also has a series of Trading Rules. This is because it is not considered appropriate to replace a strategically significant habitat (such as Habitats of Principal Importance), with a lesser habitat, even if the lesser habitat is enhanced to be in the best condition possible.

Large Brownfield Residential

3.88 The large brownfield residential site is loosely based on brownfield land within the Land off Tutts Barn Lane site.

On-Site Baseline Habitat Units

3.89 Table 25 identifies the baseline habitat area, habitat units and BNG parameters (condition etc.) within a large brownfield residential site of c 14.2 ha in size with potential to deliver c. 320 dwellings.

Table 25. Baseline Area-Based Habitats

Habitat (UKHab)	type	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units	Suggested action to address habitat losses
Urban: unvegetated, unsealed surface	Artificial	4	V.Low	N/A - Other	Low Strategic Significance	0.00	Compensation Not Required
Urban: Mosaic on Previously Developed Land	Open Habitats	4	High	Moderate	Low Strategic Significance	48.00	Same habitat required
Urban: Vacant/derelict land/ bareground		0.2	Low	Poor	Low Strategic Significance	0.40	Same distinctiveness or better habitat required \geq
Urban: Developed land; sealed surface		0.2	V.Low	N/A - Other	Low Strategic Significance	0.00	Compensation Not Required
Heathland and scrub: Mixed scrub		3	Medium	Moderate	Low Strategic Significance	24.00	Same broad habitat or a higher distinctiveness habitat required (\geq)
Sparsely vegetated land: Ruderal/ Ephemeral		2	Low	Moderate	Low Strategic Significance	8.00	Same distinctiveness or better habitat required \geq
Urban: Introduced shrub		0.3	Low	Condition Assessment N/A	Low Strategic Significance	0.60	Same distinctiveness or better habitat required \geq
Modified Grassland: grassland		0.5	Low	Poor	Low Strategic Significance	1.00	Same distinctiveness or better habitat required \geq

Total **14.2** - - - **82**

Post-Development

3.90 It is assumed that all habitats within the site will be lost as part of the development (with the exception of linear features which are assumed to be retained), and as such, to ensure a minimum of a 10% BNG (i.e. a minimum of 90.2 units), off-site habitat provision will be required.

Off-Site Baseline Habitat Units (Other Neutral Grassland)

3.91 To provide consistency with the other typologies this scenario provides Other Neutral Grassland as the off-site habitat provision. As previously detailed, this is a hypothetical scenario for purposes of reference. The Metric 3.1 calculator identifies that to be in accordance with its 'Trading Rules' certain existing habitats that are to be lost will require replacement with similar habitats of equal or better distinctiveness and/ or condition (full details are shown in Table 25) to provide the 10% BNG. As such, the following provision will not satisfy the Trading Rules, but is illustrative of how much off site habitat provision may be required for BNG provision for this typology.

3.92 Table 26 shows the baseline habitat area within a hypothetical grassland location located within the Borough.

Table 26. Off-Site Area-Based Habitat Baseline (Other Neutral Grassland)

Habitat type (UKHab)	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units
Grassland: Other neutral grassland	32.4	Medium	Moderate	Low strategic significance	259.20
Total	32.4	-	-	-	259.20

3.93 Table 27 shows the off-site post-enhancement other neutral grassland habitat provision. It shows the change in habitat condition, keeping the distinctiveness as Medium but increasing the condition from Moderate to Good.

Table 27 Off-Site Post-Enhancement Area-Based Habitats

Habitat type (UKHab)	Area (ha)	Distinctiveness Change	Condition Change	Strategic significance	Habitat Units
Grassland: Other neutral grassland	32.4	Medium-Medium	Moderate - Good	Low strategic significance	349.96
Total	32.4	-	-	-	349.96

3.94 Therefore, improving the condition of 32.4ha of neutral grassland from moderate to good would result in an improvement of 90.76 units.

Summary

3.95 All baseline habitats and habitats created are present within the accompanying metric assessment for the Proposed Development (Appendix C).

3.96 The loss of 14.2 ha of habitats associated with brownfield sites will result in the loss of 82 Habitat Units. To replace the loss of the brownfield type habitats, off-site habitat creation/ enhancement is identified. It is assumed that the replacement habitat will be within the Eastbourne Borough Council's boundary, thus ensuring the off-sit provision is within the lowest Spatial Risk Category (Compensation inside LPA or NCA, or deemed to be sufficiently local, to the site

of biodiversity loss). Enhancement of 32.4 ha of Grassland: Neutral Other Grassland from moderate to good condition, as identified in Table 27, will result in a 10.68% net percentage change (i.e. 90.76 units compared to 90.20 units for 10% BNG). **Therefore, it can crudely be assumed that to achieve 10% BNG for a typical 'large brownfield residential' site, approximately 33 ha to 35 ha of grassland offsite would need to be enhanced.**

3.97 It should be noted that in practice Biodiversity Net Gain does not simply require the relevant number of credits to be achieved but also has a series of Trading Rules. This is because it is not considered appropriate to replace a strategically significant habitat (such as Habitats of Principal Importance), with a lesser habitat, even if the lesser habitat is enhanced to be in the best condition

Offices (1000 sqm)

3.98 This employment on brownfield site was broadly based on Sovereign Harbour Site 6.

On-Site Baseline Habitat Units

3.99 Table 28 identifies the baseline habitat area, habitat units and BNG parameters (condition etc.) within a site of c 7.1 ha in size allocated to deliver c. 1000sqm of office space.

Table 28. Baseline Area-Based Habitats

Habitat (UKHab)	type	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units	Suggested action to address habitat losses
Urban: unvegetated, unsealed surface	Artificial	6	V-Low	N/A - Other	Low Strategic Significance	0	Compensation Not Required
Heathland and shrub: scrub	Mixed	1.1	Medium	Moderate	Low Strategic Significance	8.80	Same broad habitat or a higher distinctiveness habitat required (≥)
Total		7.1	-	-	-	8.80	-

Post-Development

3.100 Due to the small nature of this site, it is assumed that all habitats within the site will be lost as part of the development and as such, to ensure a minimum of a 10% BNG (i.e. at least 9.68 units), off-site habitat provision will be required.

Off-Site Baseline Habitat Units (Other Neutral Grassland)

3.101 To provide consistency with the other typologies this scenario provides Other Neutral Grassland as the off-site habitat provision. As previously detailed, this is a hypothetical scenario for purposes of reference. The Metric 3.1 calculator identifies that to be in accordance with its 'Trading Rules' certain existing habitats that are to be lost will require replacement with similar habitats of equal or better distinctiveness and/ or condition to provide the 10% BNG. As such, the following provision will not satisfy the Trading Rules, but is illustrative of how much off site habitat provision may be required for BNG provision for this typology.

3.102 .Table 29 shows the baseline habitat area within a hypothetical grassland location located within the Borough.

Table 29. Off-Site Area-Based Habitat Baseline (Other Neutral Grassland)

Habitat type (UKHab)			Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units pre enhancement
Grassland:	Other	neutral	3.5	Medium	Moderate	Low strategic significance	28
Total			3.5	-	-	-	28

3.103 Table 30 shows the off-site post-enhancement other neutral grassland habitat provision. It shows the change in habitat condition, keeping the distinctiveness as Medium but increasing the condition from Moderate to Good.

Table 30 Off-Site Post-Enhancement Area-Based Habitats

Habitat type (UKHab)			Area (ha)	Distinctiveness Change	Condition Change	Strategic significance	Habitat Units post enhancement
Grassland:	Other	neutral	3.5	Medium-Medium	Moderate - Good	Low strategic significance	37.8
Total			3.5	-	-	-	37.8

3.104 Therefore, improving the condition of 3.5ha of neutral grassland from moderate to good would result in an improvement of 9.80 units.

Summary

3.105 All baseline habitats and habitats created are present within the accompanying metric assessment for the Proposed Development (Appendix C).

3.106 The loss of 7.1 ha of habitats typical of the Sovereign Harbour Site 6 site will result in the loss of 8.80 Habitat Units. To replace the loss of the predominantly artificial unvegetated, unsealed surface type habitat, off-site habitat creation/enhancement is identified. It is assumed that the replacement habitat will be within the Eastbourne Borough Council's boundary, thus ensuring the off-site provision is within the lowest Spatial Risk Category (Compensation inside LPA or NCA, or deemed to be sufficiently local, to the site of biodiversity loss). Enhancement of 3.5 ha of Grassland: Neutral Other Grassland from moderate to good condition, will result in a 11.41% net percentage change (i.e. 9.80 units compared to 9.68 for 10% BNG). **Therefore, it can crudely be assumed that to achieve 10% BNG for a typical 'large brownfield residential' site, approximately 4 ha to 5 ha of grassland offsite would need to be enhanced.**

3.107 It should be noted that in practice Biodiversity Net Gain does not simply require the relevant number of credits to be achieved but also has a series of Trading Rules. This is because it is not considered appropriate to replace a strategically significant habitat (such as Habitats of Principal Importance), with a lesser habitat, even if the lesser habitat is enhanced to be in the best condition.

3.108 It should be emphasised that this typology is based around the Sovereign Harbour 6 site and it assumes that the vegetated shingle and botanical species present are not of S41 quality. For the actual Biodiversity Net Gain calculations that will be undertaken for the Sovereign Harbour 6 planning application, habitats at the Sovereign Harbour 6 site will require further investigation including detailed

botanical surveys to determine if the habitats within the site are in fact S41 habitats or not.

Large Housing/ Mixed Use (Redevelopment of an Existing Developed Site)

3.109 This redevelopment of an existing developed site to housing/ mixed use was broadly based on Sussex Downs College.

On-Site Baseline Habitat Units

3.110 Table 31 identifies the baseline habitat area, habitat units and BNG parameters (condition etc.) within an existing development to housing/ mixed use site of c. 14 ha in size that could be allocated to deliver 245 homes OR 117 homes, 160 care apartments and 1,800 sqm retail, and an additional 198 homes on another portion of the site. Two ha within the site are undevelopable so will be allocated for BNG enhancement.

Table 31. Baseline Area-Based Habitats

Habitat type (UKHab)	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat Units	Suggested action to address habitat losses
Urban: Developed land; sealed surface	11	V.Low	N/A - Other	Low Strategic Significance	0.00	Compensation Not Required
Grassland: Modified grassland	3	Low	Poor	Low Strategic Significance	6.00	Same distinctiveness or better habitat required \geq
Total	14	-	-	-	6.00	-

Post-Development

3.111 Approximately 2 ha of land will not be developed and as such can be retained and allocated for BNG provision. For the purposes of this typology, it is assumed that all pre-development habitats will be lost and new modified grassland will be created on site. The change of on-site habitat to be created is detailed in Table 32. This shows the on-site post-creation other neutral grassland habitat provision. It shows the change in habitat condition, keeping the distinctiveness as Low but increasing the condition from Poor to Good. To ensure a minimum of a 10% BNG, off-site habitat provision will also be required.

Table 32 On-Site Post-Creation Area-Based Habitats

Habitat type (UKHab)	Area (ha)	Distinctiveness Change	Condition Change	Strategic significance	Habitat Units Delivered post enhancement
Grassland: Modified grassland	2	Low - Low	Poor -Good	Low strategic significance	8.69
Total	2	-	-	-	8.69

3.112 With the provision of 2 ha of enhanced Grassland: Modified Grassland on-site, this results in a Biodiversity Net Gain of 44.80% (i.e. $((8.69-6.00/6.00) \times 100)$), which is well above the required 10% BNG. No further BNG provision is required for this typology.

Summary

3.113 All baseline habitats and habitats created are present within the accompanying metric assessment for the Proposed Development (Appendix C).

3.114 The loss of 14 ha of a redevelopment of an existing development site typology habitat will result in the loss of 6 Habitat Units. To replace the loss of the greenfield type habitats, on-site habitat enhancement is identified.

3.115 Creation and enhancement of 2 ha of Grassland: Modified Grassland on site from Poor to Good condition, will result in a 44.80% net percentage change. Therefore, It is anticipated that this typology will be able to provide BNG provision on site, and no off site BNG provision will be required.

Conclusion

3.116 Table 33 provides a brief summary of the typologies, type of development, the quantum, the number of BNG credits required, and the broad area of neutral grassland that would be required to be improved from Moderate to Good condition that would be required to deliver an at least 10% BNG.

Table 33: Summary of Typologies

Typology	Quantum and Type of Development	BNG Credits Lost On Site	Area of Neutral Grassland Required in Good condition to ensure 10% BNG. (ha)
Small Residential (off-site habitat- Neutral Grassland)	Greenfield 35 dwellings	16.56	4-5 ha
Large Residential	Greenfield 172 dwellings	217.70	36-40 ha
Small Residential	Brownfield 70 dwellings	7.20	12 – 13 ha
Large Residential	Brownfield 320 dwellings	82.00	33-35 ha
Offices	1000 sqm of office space	8.80	3 – 4 ha
Mixed (Redevelopment of Existing Developed Site)	Use 245 homes, 160 care apartments and 1,800 sqm retail, and an additional 198 homes on another portion of the site. OR 117 care and 1,800 sqm retail, and an additional 198 homes on another portion of the site.	6.00	Less than 2 ha (on site)

Strategic off-site Biodiversity Net Gain Requirement

3.117 Based on the preceding typologies it is possible to calculate an approximate number of total off-site BNG credits for which Eastbourne Borough Council

should plan, and the area of land involved. This will enable Eastbourne Council to identify whether there is sufficient land in their control with sufficient potential to meet any off-site BNG requirement for the borough. This calculation can be undertaken by multiplying up the land area required for each typology by an approximate number of sites to be allocated.

3.118 For example, if the Council were to deliver ten small (c. 35 dwellings) residential sites (five on greenfield and five on brownfield), four large residential sites (two on greenfield and two on brownfield), ten office sites and two mixed use sites, based on the above typologies c. 810 off-site BNG credits would be required to achieve at least 10% BNG. This would require c. 284 ha of neutral grassland (for example) to be improved from Moderate to Good condition. This gives an indication of the broad scale (rather than the precise amount) of off-site land that may need to be found over the course of the plan period to ensure a 10% BNG requirement is met for all new development in the borough.

3.119 It should be noted that there are many facets that go into the BNG Metric 3.1 calculations, and changes to any one of these will alter the results, and thus the BNG requirements. On-site examples of these include the exact area of habitats on site, their specific distinctiveness and condition, strategic significance, and whether the area is to be lost entirely or retained and enhanced. Off-site examples include the exact area of existing habitat on site and specific distinctiveness and condition, strategic significance, if the existing habitat is to be lost or enhanced, the target habitat's distinctiveness and condition, when the habitat enhancements/ creation is to take place (i.e. in advance or delayed) and the location of the off-site BNG provision (i.e. is the compensation land inside the LPA or NCA, or deemed to be sufficiently local, to site of biodiversity loss or not).

3.120 Further to this, Metric 3.1 has 'Trading Rules' that need to be adhered to. Certain habitats will need to be replaced with like for like habitat or equivalent habitats that have been improved in condition. It is noted that several of the typologies detailed above include the loss of the NERC S41 habitat Grassland: Floodplain Wetland Mosaic (CFGM). For the purposes of comparison we have assumed that the BNG replacement habitat for this will be neutral grassland. However to satisfy the Metric 3.1 Trading Rules, to achieve a 10% BNG the same habitat is required (i.e. there needs to be a 10% net gain in Grassland: Floodplain Wetland Mosaic). Less distinctive habitats do not require like for like replacements but may require a replacement with a similar habitat type or a habitat of a similar or better distinctiveness. Habitat quality will always require betterment. As such, when looking for off-site BNG provision for loss of Grassland: Floodplain Wetland Mosaic, this can only be replaced with this habitat type. This will either require enhancement of existing floodplain habitat or the creation of new floodplain habitat. By its nature this habitat type is hydrologically limited and as such would limit potential locations for off-site BNG provision.

3.121 Therefore, it is clear that the precise amount of land required for off-site BNG cannot be determined until:

- a. a full suite of ecological surveys are undertaken to help inform any habitat changes and management. This includes (but is not limited to) Phase 1/ HabsUK habitat surveys and protected species surveys.

- b. a detailed investigation of the potential off-site locations discussed below has been undertaken in order to determine exactly how many credits each may be able to achieve; and
- c. each proposed allocation has been subject to master-planning such that detailed BNG calculations can be undertaken.

3.122 Linear features such as ditches and hedgerows can significantly affect the BNG calculations. However, since there is no information regarding at this stage how linear features would be handled for any allocated site it was considered that attempting to include them at this stage would further add to the assumptions needed without a site masterplan without adding much benefit to the broad analysis undertaken. This will therefore need reviewing (as will all the BNG calculations) when planning applications with site masterplans are available.

3.123 However, the preceding calculations give a good indication of the broad scale of land required i.e., potentially up to c. 300 ha. Note that even if the actual area of land required to meet BNG requirements is less than 300 ha there will also be a need for enhancement of offsite land to ensure no net loss of local wildlife site quality areas within the borough boundary over the plan period, given the consideration of some sites with a local nature designation for development. This would be additional to any land required to achieve BNG.

Areas of Potential Habitat Enhancements and BNG Land Provision

3.124 This Section of the report identifies some potential locations that could be considered for habitat enhancement (including, but not exclusively for BNG provision), focussing on land within the ownership of Eastbourne Borough Council, or other public bodies, and on land within the Eastbourne Borough boundary (including land that is owned by Eastbourne Council but which lies within the South Downs National Park). Land that has the lowest existing ecological value will generally provide the greatest scope for delivering BNG.

3.125 It should be noted that prior to any of the below land parcels being taken forward, it is recommended that a full suite of ecological surveys are undertaken to help inform any proposed habitat changes and management. This includes (but is not limited to) Phase 1/ HabsUK habitat surveys and protected species surveys.

Eastbourne Park

3.126 Eastbourne Park is a large area (c. 350 ha) within the centre of Eastbourne (see Figure 1 overleaf), much of which has been identified as being undevelopable due to its function as functional floodplain.

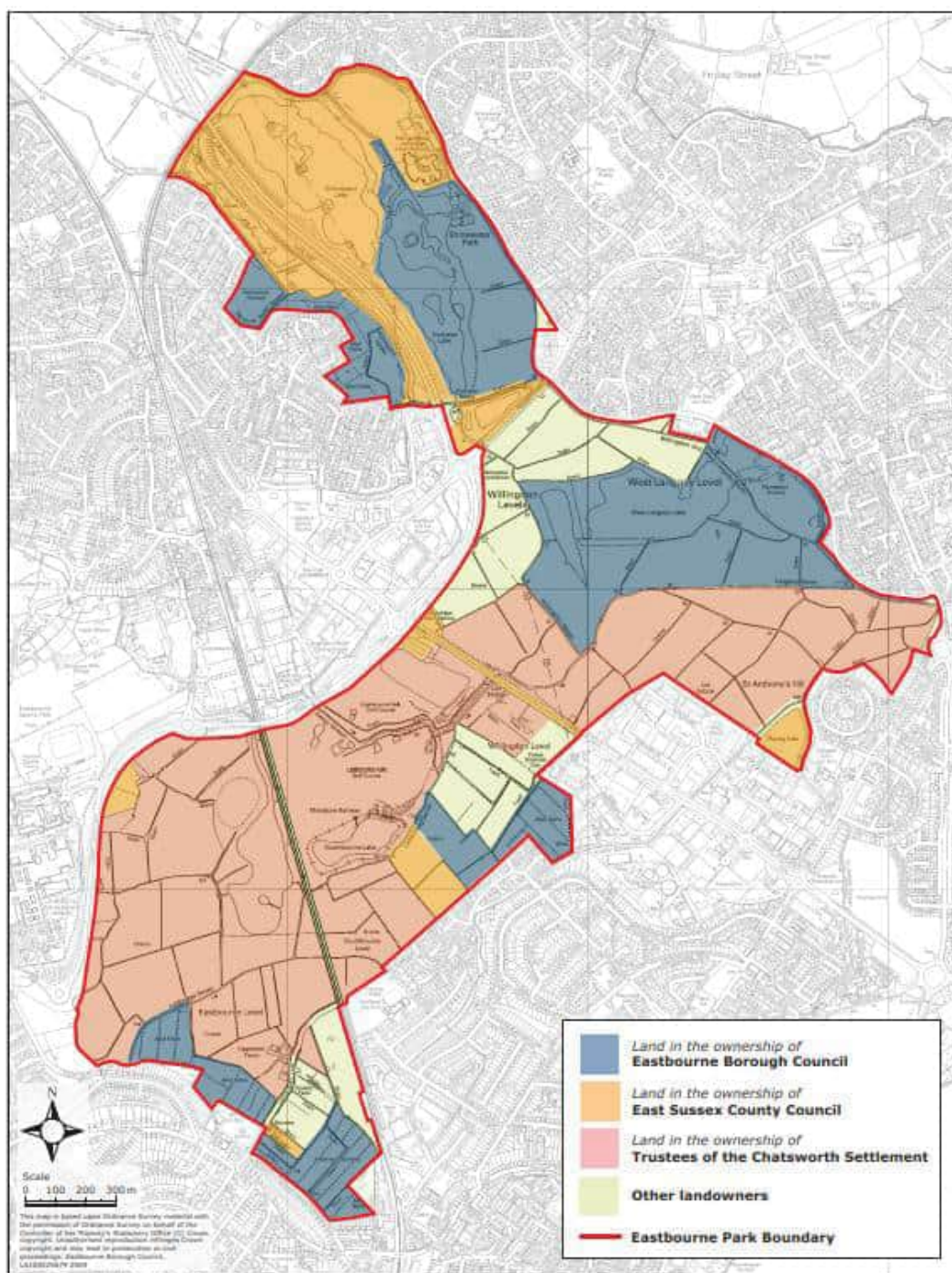


Figure 1: Location of Eastbourne Park

3.127 A large majority of the Park is owned by Eastbourne Borough Council, East Sussex County Council or Trustees of the Chatsworth Settlement. A large proportion of the park is identified as already providing the NERC S41 habitat Floodplain Wetland Mosaic which means that is well placed to deliver further such habitat, or to restore the existing habitat to a better condition, but also means that there may be limited potential for further improvement in some parts of the site. Without knowing the condition of the existing habitats within Eastbourne Park, it is not possible to determine what enhancements could be implemented or how much BNG capacity the Park could provide. However due to its largely public ownership, and its size, the Park could be a good location to provide Floodplain Wetland Mosaic BNG habitats.

3.128 It is therefore recommended that at the next stage of plan development a detailed study of the BNG potential of Eastbourne Park is undertaken.

Land to the East of Eastbourne, within Eastbourne Borough

3.129 An area of c. 30 ha that is identified as currently being floodplain grazing marsh (MAGIC) is located to the East of the Borough, broadly east of Langney and north of Pevensey-Bay Road and south of the B2191 (See Figure 2).

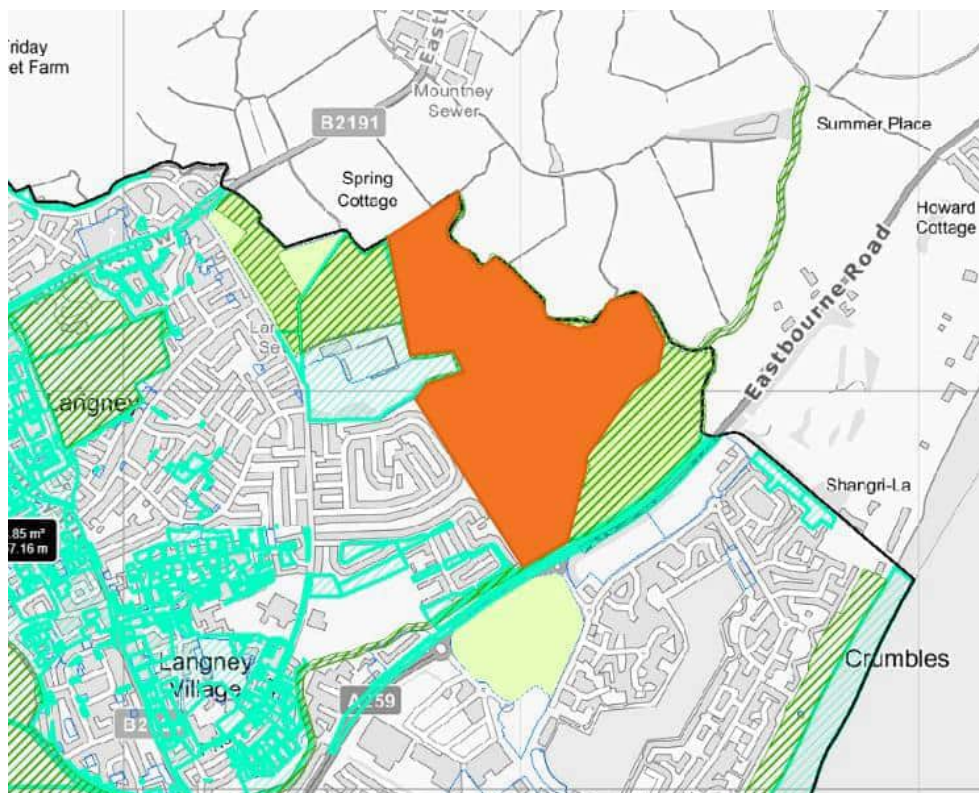


Figure 2: Location of Land to the East within Eastbourne Borough

3.130 This land is in private ownership and is also identified as two of the ten land parcels that has been provided by the Council for Biodiversity Assessment (part of Land at East Langney Levels and Land off Pevensey Road), although it is understood the entire land parcel is not proposed for development. Without knowing the condition of the existing habitats within this land parcel, it is not possible to determine what enhancements could be implemented or how much BNG capacity the land parcel could provide but the fact it is being considered for development suggests that it represents historic grazing marsh rather than currently functional grazing marsh which would mean there is considerable room for enhancement and BNG. From review of aerial mapping it appears as though some of the land parcel is in arable use (tram lines are visible on aerial mapping), and as such this portion of the land parcel is likely to be in poor or very poor condition and as such could provide more BNG credit when improved to good, than a habitat that is currently in moderate condition.

3.131 It is therefore recommended that at the next stage of plan development a detailed study of the BNG potential of this site is undertaken.

Land to the East within Wealden District

3.132 An area of c. 175 ha that is identified as floodplain grazing marsh (MAGIC) is located just outside of the to the East of the Borough within Wealden District (See Figure 3).

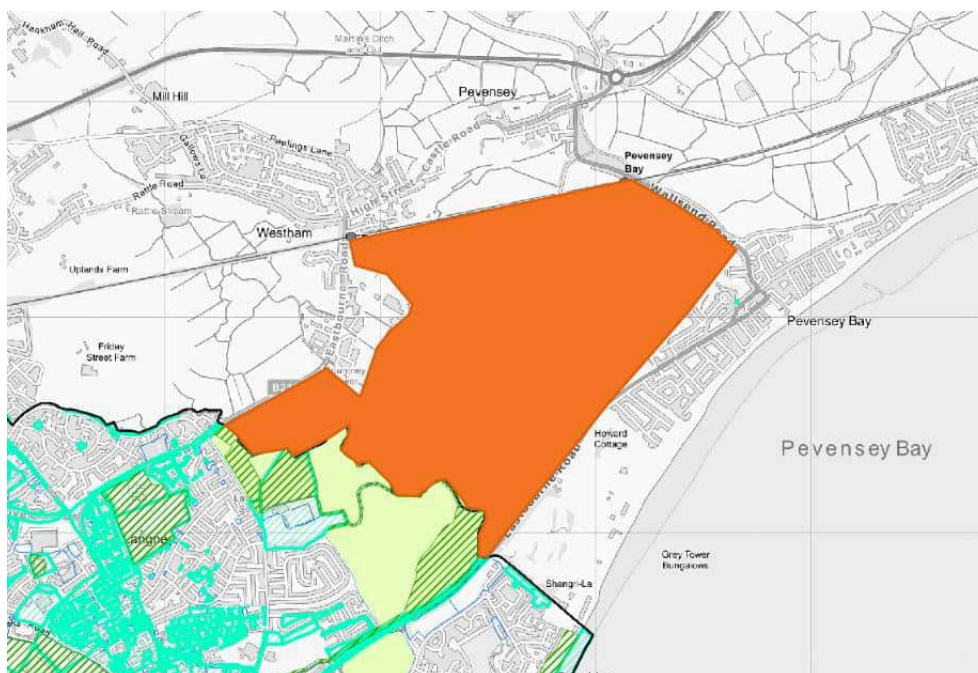


Figure 3: Location of Land to the East within Wealden District

3.133 This land is located outside of the Borough boundary within Wealden District and is in private ownership. This introduces complexities compared to land within Eastbourne but does present potential for grazing marsh restoration. Without knowing the condition of the existing habitats within this land parcel, it is not possible to determine how much BNG capacity the land parcel could provide. However due to its existing floodplain grazing marsh habitat it is anticipated that it could potentially provide Floodplain Wetland Mosaic BNG habitats. From review of aerial mapping it appears as though some of the land parcel is in arable use (tram lines are visible on aerial mapping), and as such this portion of the land parcel is likely to be in poor or very poor condition and as such could provide more BNG credit when improved to good, than a habitat that is currently in moderate condition.

3.134 **It is therefore recommended that at the next stage of plan development a detailed study of the BNG potential of this site is undertaken.**

Land to the West within Eastbourne Borough

3.135 An area of more than 1000 ha that is within the ownership of Eastbourne Borough Council is located within the South Downs National Park (See Figure 4).

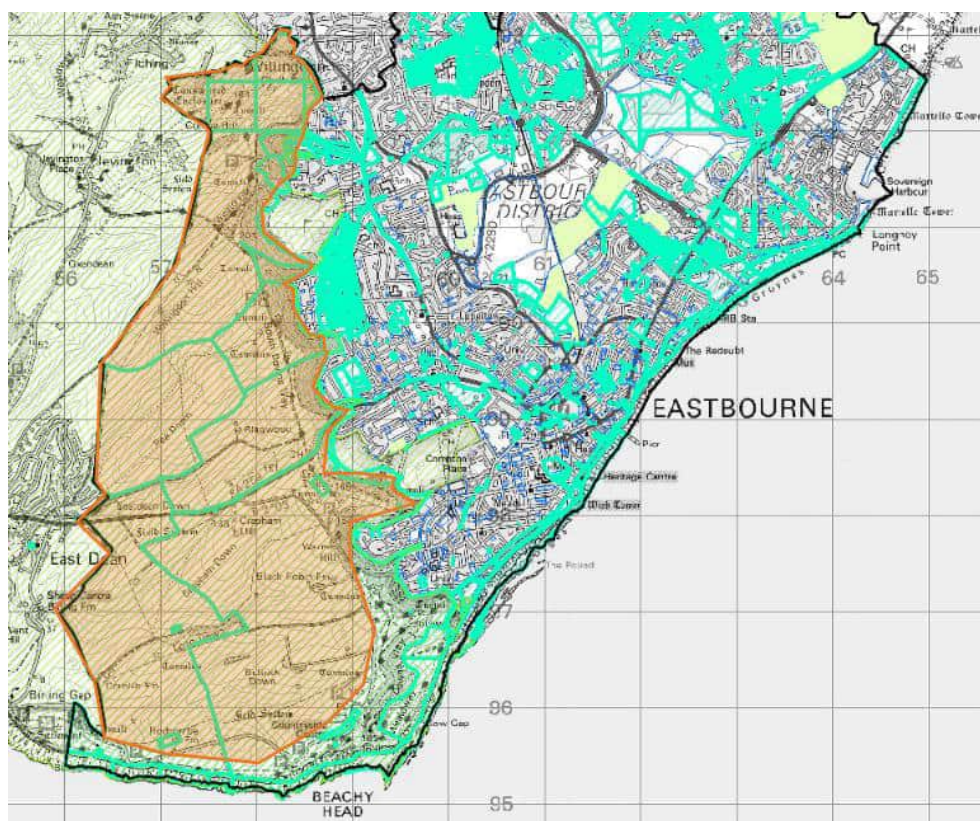


Figure 4: Location of Land to the West of Eastbourne Borough

3.136 From review of MAGIC, parcels of this land are identified as ‘good quality semi-improved grassland’ and ‘lowland calcareous grassland’.

3.137 Much of this land is also contained within the Seaford to Eastbourne Downs BOA. Portions of the BOA are within ESS Higher Level Stewardship, or are in the process of applying for Countryside Stewardship Higher Tier. The Lawton Recovery map identifies that portions of this area are identified as B-Lines area by Buglife, it contains small areas of ‘High Chalk Grassland Potential’ SSSI unites not in favourable condition and ‘Local Wildlife Sites (failing SDL160)’. The downland is farmed by four tenant farmers and the open downland is managed by EBC⁶²

3.138 From review of aerial mapping it appears as though much of this land is in fact grassland, however from review of aerial mapping it is not possible to determine the type. Without knowing the exact type and condition of the existing habitats within this land parcel, it is not possible to determine what enhancements could be implemented or how much BNG capacity the land parcel could provide. Due to its large size, it is anticipated that only a small portion would be required to provide strategic BNG provision. It is noted that due to its raised topographical nature of this land parcel it is not suitable to provide BNG capacity to replace the floodplain grazing marsh habitats.

3.139 It is therefore recommended that at the next stage of plan development a detailed study of the BNG potential of this site is undertaken.

⁶² Available at [Eastbourne Downland Whole Estate Plan 2020-2045 - Lewes and Eastbourne Councils \(lewes-eastbourne.gov.uk\)](https://www.lewes-eastbourne.gov.uk) [accessed 07/07/2023]

3.140 Ten land parcels were provided by the Council to be subject to a Biodiversity Assessment. If any of these are not brought forward as development land they have the potential to provide off-site BNG provision.

Areas For Potential Wildlife Corridors

3.141 This Section of the report identifies potential locations that could be considered for the creation and enhancement of wildlife corridors within the Borough (including land that is within the South Downs National Park Authority). All areas below have been identified without bias or prior knowledge of land ownership.

3.142 To allow the best chances for potential wildlife corridors, a ground truthing and Phase 1 / UK Habs survey should be undertaken as a minimum to determine suitability of the identified potential linkages across the Borough. Where sites are deemed potentially suitable, an appropriate habitat management plan should be introduced to allow the wildlife corridor to function appropriately.

3.143 In addition to the sites identified below, larger roadside verges (as an example; the verges along Pevensey Bay Road), and areas of amenity greenspace (such as pocket parks and larger parks such as Princess Park, and playing fields) could also be enhanced (in the case of playing fields, even if this is only around the boundaries of the sites) to provide 'stepping stones' for wildlife within the urban areas. These have not been identified or discussed further within this report.

East Dean Road (A259)

3.144 East Dean road runs from the west of the borough in East Dean in parallel with Downs View Lane. These two roads are sighted well to be enhanced as a wildlife corridor. The roads link East Dean and the wider area, including Westdean and Friston Forest to the more urban areas of central and east Eastbourne (Image 1)

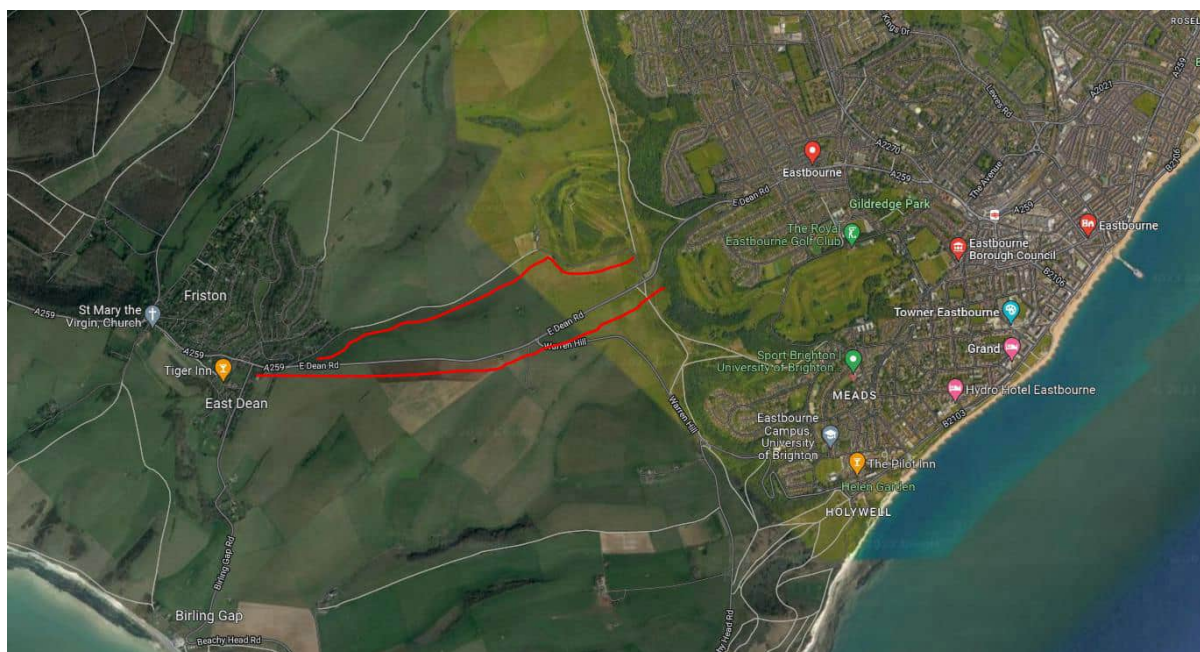


Image 1 Map of East Dean Road and Downs View Lane

3.145 East Dean road (Image 2) currently display verge habitat and fencing consistent with heavy highways maintenance. There is the potential to add linear connectivity features such as dead hedges, lines of trees and hedgerows.

Grassland could be managed to encourage wildlife. This has the potential to increase the dispersal of wildlife and habitats such as calcareous grassland.



Image 2 East Dean Road typical habitat

3.146 Downs View Lane (Image 3), leading into the private lane (public bridleway) that moves across to Eastbourne Downs Golf Club to the east, appears to have an existing species poor hedgerow. It may be possible to enhance the existing habitat to create a denser and more biodiverse hedge to support large populations of birds, mammals and invertebrates. Creating a denser hedgerow provides more protection of commuting species. Further, the grassland could be managed to encourage the re-establishment of calcareous grasslands.



Image 3 East end of Downs View Lane and start of public bridleway

Eastbourne Railway

3.147 The linear railway (Image 4) will already offer a wildlife corridor function from the main station for approximately 5 km through central Eastbourne, connecting urban green areas with larger green areas such as Eastbourne Allotments, Merchants field Allotments, two water bodies including Southbourne Lake adjacent to the Eastbourne Miniature Steam Railway, Decoy Stream at Lottbridge Gold Club and up into areas connecting to Shinewater Lake and Hydneye Lake.

3.148 As a branch of the track heads east towards Pevensey Bay Station this feature is open to providing connectivity across a large section of Eastbourne from the central south to the north and east of the borough and into Wealden.

3.149 Due to the land ownership of this railway track and its surroundings, there will be certain rules that must be followed with regard to habitat enhancement along a rail feature including low leaf dropping species, distances to tracks etc. However, the inaccessible nature of the railways verge to the public means it is likely to be a heaven for wildlife whom are able to utilise the space somewhat undisturbed.

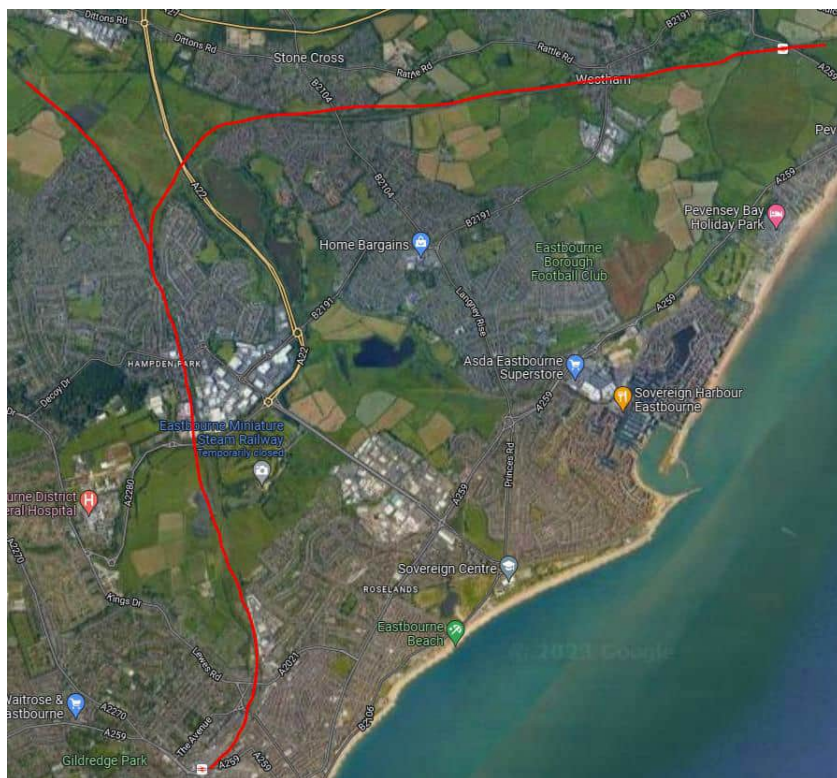


Image 4 Railway running north from Eastbourne railway station

Langney, Crumbles and Horsey Sewers

3.150 Langney Sewer (Image 5) is an open watercourse running from Kings Close, Eastbourne through to north of Pevensey Bay station (in Wealden District) where it meets Salt Haven watercourse. It passes through both countryside and urban areas meaning it is well placed to connect the west of Eastbourne with central Eastbourne and out to the east of Eastbourne towards Pevensey. It should be noted that sections of Langney, Crumbles and Horsey Sewers are already designated as LWSs (see paragraph 1.14 and Appendix A, Figure A2)

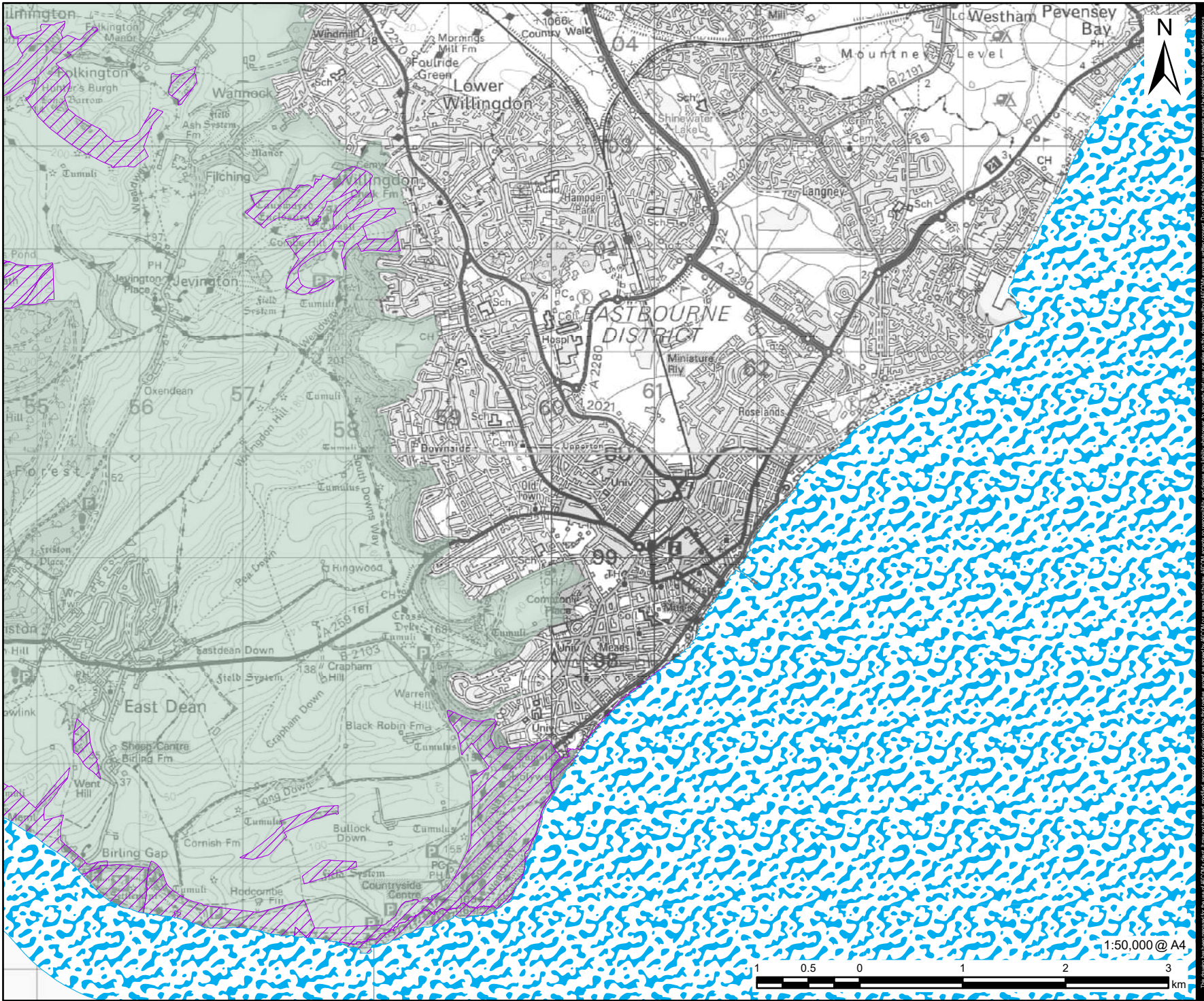
3.151 Enhancing habitats and water quality along the watercourse and enhancing the surrounding riparian and terrestrial habitats. This could help improve populations of both terrestrial and aquatic invertebrates, and flora, reptiles and birds. A linear feature such as scrub and hedgerows on at least one bank of the watercourse could help connect isolated woodland areas within Eastbourne Park to other isolated areas of woodland and particularly to undisturbed woodland areas such as the verge of Pevensey Bypass which could provide optimum habitat for mammals, birds and bats.



Image 5 Langney Sewer urban area

Appendix A : Figures

A.1 Figure A1 – Statutory Designated Sites







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PROJECT
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- LEGEND**
-  Eastbourne Borough Boundary
 -  Marine Conservation Zone
 -  Site of Special Scientific Interest
 -  South Downs National Park Boundary

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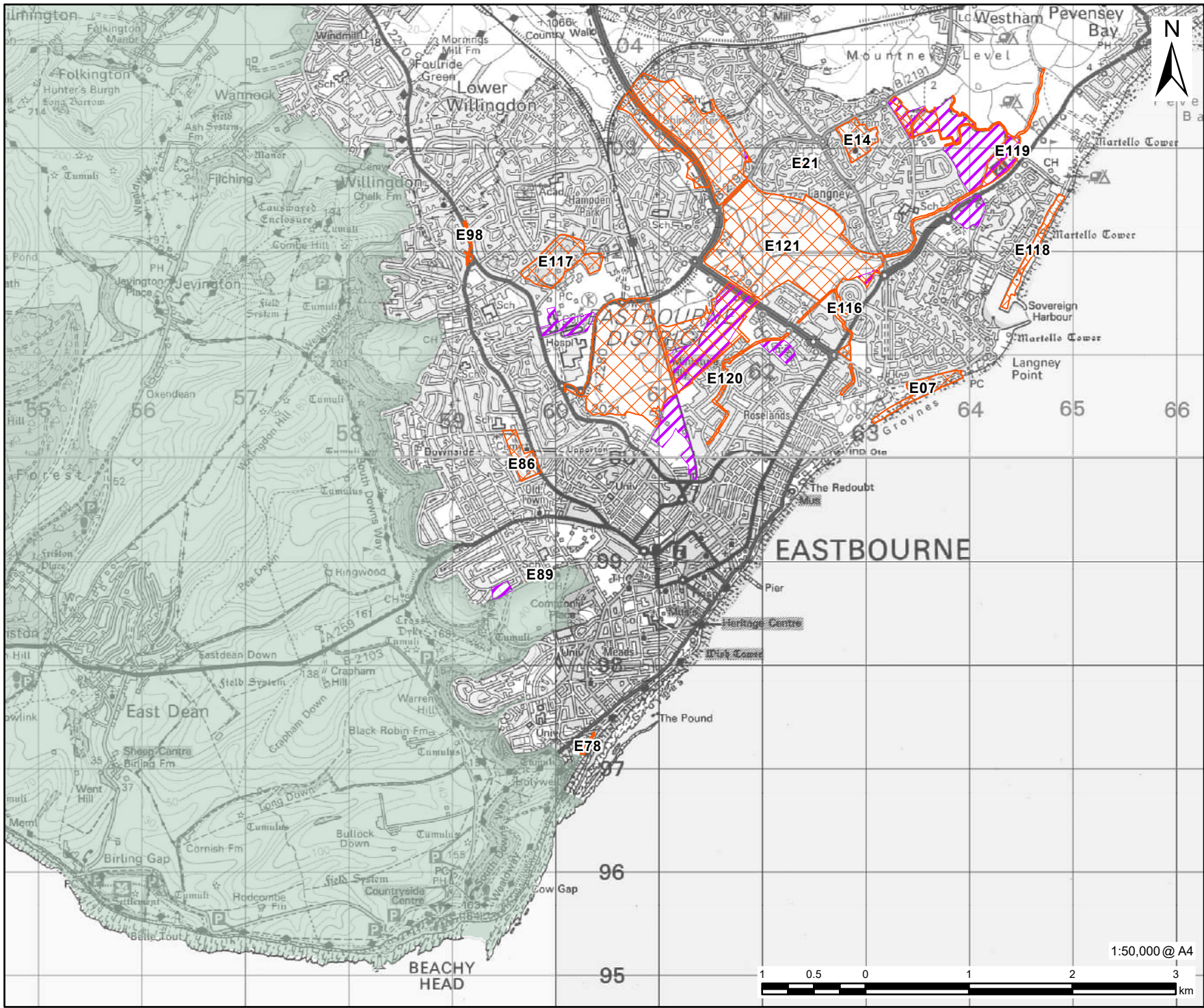
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 FINAL
PROJECT NUMBER
 60676353
FIGURE TITLE
 Statutory Designated Sites

FIGURE NUMBER
 Figure A1



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A.2 Figure A2 – Local Wildlife Sites and Sites allocated for biodiversity in Eastbourne






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 Eastbourne Biodiversity Study

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LEGEND

-  Eastbourne Borough Boundary
-  Local Wildlife Sites (LWS)
-  EBC Biodiversity Assessment Sites
-  South Downs National Park Boundary

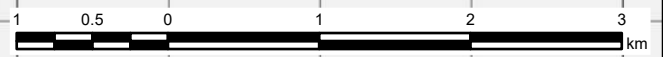
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PROJECT NUMBER
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FIGURE TITLE
 Location of Sites for Biodiversity Assessments

FIGURE NUMBER
 Figure A2



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A.3 Figure A3 – Biodiversity Action Plan (Priority) Habitats within Eastbourne

Appendix B Site Visit Results

B.1 Land off Tutts Barn Lane

3.152 Land parcel EP18 is noted as a disused plant nursery site. Whilst access was granted, the site was not accessed for health and safety reasons (access into the main part of the site was through a dilapidated greenhouse). Access was granted by the landowners for land parcels EP45, EP44 and EP43, however at the time of the visit, these fields were secured with padlocks and it was not deemed safe to access (barbed wire on gates, old rusty and broken gates, overgrown vegetation, high gates). What habitats were visible from the periphery was noted. We were not granted access into EP36. What habitats were visible from the periphery were noted. UP03 was accessed.

3.153 Table 34 details broad descriptions of habitats and features on the various land parcels at Land off Tutts Barn Lane.

Table 34. Site Description: Land off Tutts Barn Lane

Land Parcel	Broad Habitats Present	Plate Number
EP18	From review of aerial imagery the site includes disused greenhouses, extensive scrub and tall unmanaged grassland/ ruderal herbs.	1
EP45	From viewing the site from the site boundary, it appears to be grazed meadowland. At the time of the visit it appears to have not been grazed for some time with grassland interspersed with tall ruderal vegetation and small areas of scrub emerging.	2
EP44	From viewing the site from the site boundary, it appears to be dominated by grazed meadowland with areas of scrub, and tall ruderal herbs with mature trees within the centre of the land. The site also contains a small complex of barns.	3
EP43	From viewing the site from the site boundary, it appears to be tightly grazed meadowland with areas of scrub, tall ruderal herbs and patches of bare earth.	4 & 5
EP36	From reviewing the site from the site boundary and from aerial imagery the site appears to be a brownfield site (disused railway sidings). It contains a mosaic of habitats on previously developed land including scrub, bare earth, hardstanding, tall and short ruderal vegetation with several mature trees.	6 & 7
UP03	From the site visit, this site is a brownfield site (disused water company property). It contains a mosaic of habitats on previously developed land including scrub, large areas of bare earth including gravel and rubble, hardstanding, tall and short ruderal vegetation with occasional mature sycamore trees.	8, 9 & 10

Plates (1 – 10)

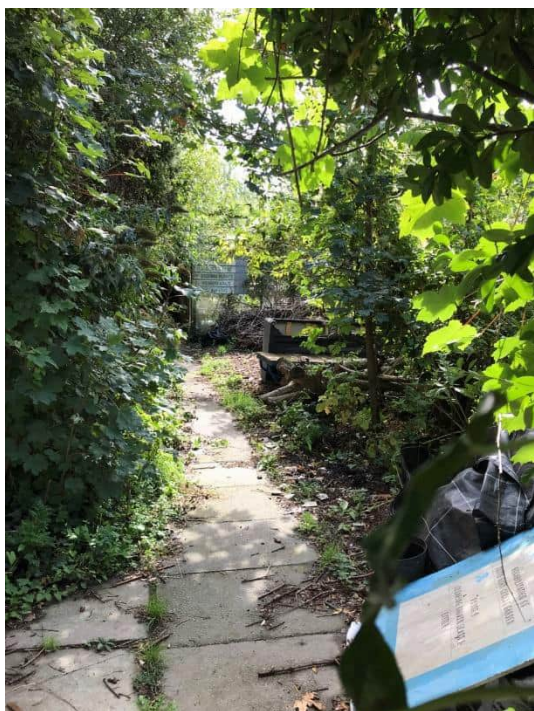


Plate 1: Land off Tutts Barn Lane UP18



Plate 2: Land off Tutts Barn Lane EP45



Plate 3: Land off Tutts Barn Lane EP44



Plate 4: Land off Tutts Barn Lane EP43



Plate 5: Land off Tutts Barn Lane EP43



Plate 6: Land off Tutts Barn Lane EP36



Plate 7: Land off Tutts Barn Lane EP36



Plate 8: Land off Tutts Barn Lane UP03



Plate 9: Land off Tutts Barn Lane UP03



Plate 10: Land off Tutts Barn Lane UP03

B.2 Land at East Langney Levels

3.154 No access was permitted to LA36 however the site could be well viewed from public land along Priory Road and the B2191. Land parcel LA 41 was accessed, in addition much of this land was also visible from Priory Road. Access was not permitted to the two residential properties at LA39 and LA38. These are located on a private road, and as such none of the land was visible from publicly accessible space. Land parcel LA37 is owned by Eastbourne Borough Council and accessible along Public Rights of Way within the site. However, access into the site was very overgrown, so the entirety of the site was not visible during the walk over. Access was not granted to LA43 and this site was not visible from the publicly owned and adjacent to the site.

3.155 Table 35 details broad descriptions of habitats and features on the various land parcels at Land at East Langney Levels.

Table 35. Site Description: Land at East Langney Levels

Land Parcel	Broad Habitats Present	Plate Number
LA36	The site appears to be a brownfield site, containing a matrix of habitats on previously developed land. The dominating habitats	11 & 12

are, tall ruderal and hardstanding with a small corner of the site dominated by Phragmites.

LA41	The site is damp cattle grazed grassland containing pockets of rushes, reedsand phragmites. The grassland provided a mosaic of tall tussocked grassland with areas of shorter grassland, all with a thatch.	13, 14 & 15
LA39	From review of aerial imagery this site appears to be a residential property with buildings, hardstanding and amenity grassland and ornamental scrub	None
LA38	From review of aerial imagery this site appears to be a residential property with buildings, hardstanding and amenity grassland and ornamental scrub	None
LA37	A mosaic of tall unmanaged grassland,herbs, and scrub.	16, 17 & 18.
LA43	From review of aerial imagery this site appears to provide damp grazing marsh with tussocked grassland.	None

Plates (11- 18)



Plate 11: Land East of Langney Levels EP36



Plate 12: Land East of Langney Levels EP36



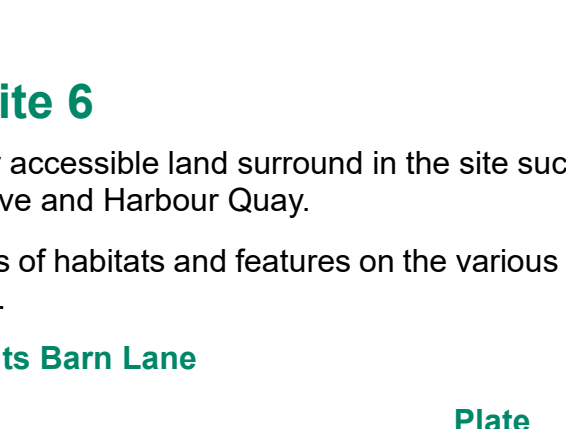
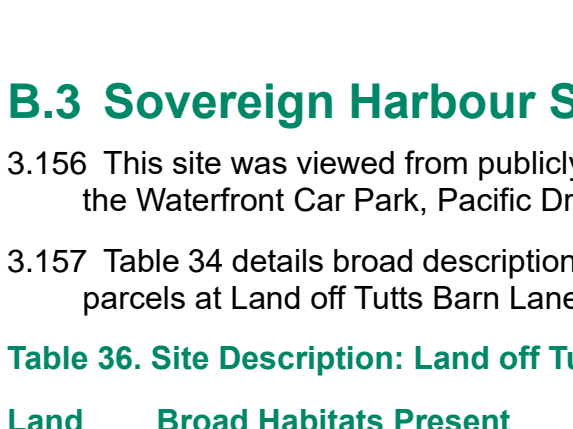
Plate 13: Land East of Langney Levels LA41 *Plate 14: Land East of Langney Levels LA41*



Plate 15: Land East of Langney Levels LA41 *Plate 16: Land East of Langney Levels LA37*



Plate 17: Land East of Langney Levels LA37 *Plate 18: Land East of Langney Levels LA37*



B.3 Sovereign Harbour Site 6

3.156 This site was viewed from publicly accessible land surround in the site such as the Waterfront Car Park, Pacific Drive and Harbour Quay.

3.157 Table 34 details broad descriptions of habitats and features on the various land parcels at Land off Tutts Barn Lane.

Table 36. Site Description: Land off Tuts Barn Lane

Land Parcel	Broad Habitats Present	Plate Number
SO16/ SO17	This site is a disused landfill that is dominated by a height of gravel with occasional scattered scrub and ruderal vegetation.	19

Plates (19)



*Plate 19: Sovereign Harbour Site 6 SO16/
SO17*

Appendix C : Biodiversity Metric 3.1 Calculations

C.1 Small Greenfield Residential (Floodplain Wet Mosaic (CFGM))

On-site baseline	<i>Habitat units</i>	16.56
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-100.00%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	37.80
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	56.10
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	1.74
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	10.50%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Trading rules Satisfied?	Yes ✓	

C.2 Small Greenfield Residential (Other Neutral Grassland)

On-site baseline	<i>Habitat units</i>	16.56
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-100.00%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	33.20
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	51.55
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	1.79
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	10.80%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Trading rules Satisfied?	No - Check Trading Summary ▲	

C.3 Large Greenfield Residential

On-site baseline	<i>Habitat units</i>	217.70
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	140.69
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-35.37%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	288.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	388.84
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	23.84
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	10.95%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Trading rules Satisfied?	No - Check Trading Summary ▲	

C.4 Small Brownfield Residential

On-site baseline	<i>Habitat units</i>	7.20
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-100.00%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	23.20
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	31.32
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.92
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	12.82%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Trading rules Satisfied?	No - Check Trading Summary ▲	

C.5 Large Brownfield Residential

On-site baseline	<i>Habitat units</i>	82.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-100.00%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	259.20
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	349.96
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	8.76
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	10.68%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Trading rules Satisfied?	No - Check Trading Summary ▲	

C.6 Offices (1000 sqm)

On-site baseline	<i>Habitat units</i>	8.80
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	-100.00%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	28.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	37.80
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	1.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	11.41%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Trading rules Satisfied?	No - Check Trading Summary ▲	

C.7 Large Housing/ Mixed Use (Redevelopment of an Existing Developed Site)

On-site baseline	<i>Habitat units</i>	6.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	8.69
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site net % change <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	44.80%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Off-site baseline	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention <small>(Including habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total net unit change <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	2.69
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus <small>(including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	44.80%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%
Trading rules Satisfied?	Yes ✓	

