

Consultation Report

Adur Green Infrastructure and Biodiversity Supplementary Planning Document

Worthing Green Infrastructure and Biodiversity Supplementary Planning Document

Adur & Worthing Biodiversity Net Gain Technical Advice Note

Adur & Worthing Urban Greening Technical Advice Note

1. Introduction

1.A Purpose of this Report

1.01 This report has been prepared to support the adoption of the following documents:

- Adur Green Infrastructure and Biodiversity Supplementary Planning Document (SPD)
- Worthing Green Infrastructure and Biodiversity Supplementary Planning Document (SPD)
- Adur & Worthing Biodiversity Net Gain (BNG) Technical Advice Note (TAN)
- Adur & Worthing Urban Greening Technical Advice Note (TAN).

1.02 The report summarises the consultation undertaken on the draft documents, identifies the representations received, explains the principal issues raised during consultation and sets out the councils' response to those issues. It also identifies the amendments made in response to consultation and explains how those amendments have informed the final versions of the documents.

1.03 The report forms part of the evidence base supporting adoption of the SPDs and associated technical guidance.

1.04 The councils published the documents for consultation from 20 February to 22 March 2026.

1.05 The councils received 24 representations. Representations were received from a range of respondent categories including statutory consultees, government agencies, infrastructure providers, neighbouring authorities, environmental organisations, planning consultants, community organisations, parish councils and individual residents.

1.06 A representation was received from Sussex Wildlife Trust after the formal consultation period closed. This was considered in preparing the final versions of the documents.

1.07 The representations were generally supportive of the objectives of the documents. The main issues raised related to the status of the SPDs and TANs, biodiversity net gain, mapping interpretation, constrained sites, proportionality and document usability. These issues are summarised in Section 2 and addressed in more detail in Section 6.

1.08 This report should be read alongside:

- the final versions of the SPDs and TANs
- Appendix A – Consultation Response Schedule

- Appendix B – Schedule of Amendments Following Consultation
- the supporting evidence base and mapping.

1.09 The appendices provide the detailed consultation response schedule, schedule of amendments and additional BNG consistency review.

2. Summary of Consultation Outcomes

- 2.01 The consultation did not identify any issue requiring a fundamental change to the purpose or overall approach of the SPDs or TANs. The amendments arising from consultation are therefore focused on clarification, legal robustness, proportionality, usability and consistency with national guidance.
- 2.02 The primary issues raised through consultation and the resulting amendments fall into four key thematic areas:

Principal Issue	Councils' Clarification and Amendments
1. Role and Status of the SPDs and TANs	The documents have been amended to reinforce their role as guidance. They do not introduce new policy requirements or designations, alter site allocations, create new decision-making tests or predetermine planning outcomes.
2. Biodiversity Net Gain (BNG)	The documents have been amended to clarify the relationship between statutory BNG, adopted local policy, exemptions, thresholds, legal securing mechanisms and national guidance.
3. Mapping Interpretation	The documents have been amended to clarify that LNRS, ACIB and green infrastructure mapping provide evidence and opportunity context. They are not policy designations or constraint maps and do not predetermine planning outcomes.
4. Implementation and Usability	The documents have been amended to improve cross-referencing, navigation, proportionality wording and explanation of how site-specific planning judgement applies, particularly on constrained sites.

3. Purpose and Status of the SPDs and TANs

3.A Background

- 3.01 The preparation of the SPDs and supporting TANs reflects the increasing importance of integrating green infrastructure, biodiversity enhancement, urban greening and climate resilience into the design and delivery of development proposals.
- 3.02 National planning policy increasingly emphasises multifunctional green infrastructure, biodiversity recovery, ecological connectivity, urban greening and climate resilience.
- 3.03 The councils therefore prepared the SPDs and supporting TANs to provide a clearer framework for the interpretation and implementation of adopted development plan policies relating to:
- green infrastructure
 - biodiversity
 - biodiversity net gain
 - ecological connectivity
 - sustainable drainage
 - urban greening
 - climate resilience.
- 3.04 The documents are intended to support applicants and decision-makers by encouraging early consideration of green infrastructure and biodiversity issues as part of the design process rather than as late-stage mitigation measures.

3.B Status of the Documents

- 3.05 The SPDs and TANs are guidance documents. They support the interpretation and application of adopted development plan policies and relevant national requirements. They do not form part of the statutory development plan.
- 3.06 The documents do not:
- introduce new policy requirements
 - introduce new designations
 - alter the allocation status of sites
 - create new decision-making tests
 - increase biodiversity net gain requirements beyond those established through legislation or adopted policy

- predetermine planning outcomes.

3.07 Their purpose is to provide additional clarity on how adopted policy and national requirements should be interpreted and applied locally.

3.C Relationship Between the SPDs and TANs

3.08 The SPDs provide overarching guidance on the interpretation and application of adopted Local Plan policies. The TANs provide more detailed technical and procedural guidance intended to assist applicants in preparing planning applications and supporting information.

3.09 For example, the Biodiversity Net Gain TAN provides more detailed guidance relating to:

- biodiversity metric requirements
- exemptions and thresholds
- supporting ecological information
- legal securing mechanisms
- Habitat Management and Monitoring Plans
- Watercourse Metric requirements
- management and monitoring considerations.

3.10 Similarly, the Urban Greening TAN provides more detailed technical guidance relating to urban greening measures, green roofs, green walls, ecological enhancement features and sustainable drainage integration.

3.11 Maintaining this distinction allows detailed technical guidance to be updated where necessary without requiring formal revision of the SPDs. Cross-references have been added to help users move between the SPDs and the more detailed TANs.

4. Relationship with Local Plan Policy and National Policy

4.A Local Plan Context

4.01 The SPDs and TANs have been prepared to support the implementation of adopted local plan policies within the [Adur Local Plan 2017](#) and [Worthing Local Plan 2023](#).

4.02 Where statutory biodiversity net gain requirements apply, the statutory biodiversity net gain framework establishes a national requirement for qualifying development to deliver at least 10% biodiversity net gain, subject to exemptions, thresholds and transitional arrangements established through legislation and national guidance.

4.03 In the Worthing Local Plan Area, Policy DM18 establishes a separate local policy requirement for 20% biodiversity net gain on previously developed land where applicable.

4.04 The guidance does not increase either the statutory BNG requirement or the separate local policy requirement in Worthing. It also does not apply BNG requirements to development that is exempt under the statutory framework.

4.B National Policy and Guidance

4.05 Some representations commented on duplication of national guidance. The final documents have therefore been amended to rely more clearly on cross-references to current national guidance where appropriate.

4.06 This is particularly important for biodiversity net gain, where legislation, regulations and national guidance continue to evolve. The documents should therefore be read alongside the statutory framework and national guidance in force when a proposal is considered.

5. Consultation Process

5.A Consultation Requirements

5.01 Consultation on the draft SPDs and TANs was undertaken in accordance with the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) and the councils' adopted [Statement of Community Involvement](#) (2024).

5.02 The consultation was undertaken prior to the commencement of the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2026](#). The councils have also had regard to relevant transitional arrangements applying at the point of adoption.

5.03 The consultation process was intended to provide a meaningful opportunity for statutory consultees, neighbouring authorities, infrastructure providers, environmental organisations, local stakeholders and members of the public to comment on the draft documents prior to adoption.

5.B Consultation Period

5.04 Public consultation on the draft documents was undertaken between 20 February and 22 March 2026.

5.05 The consultation period met the statutory minimum requirements for supplementary planning documents.

5.C Consultation Documents

5.06 The following documents were published for consultation:

- Adur Green Infrastructure Supplementary Planning Document (SPD)
- Worthing Green Infrastructure Supplementary Planning Document (SPD),
- Adur & Worthing Biodiversity Net Gain (BNG) Technical Advice Note (TAN)
- Adur & Worthing Urban Greening Technical Advice Note (TAN).

5.07 Supporting mapping, evidence documents and online response mechanisms were also made available.

5.D Consultation Methods

5.08 The councils used a range of consultation methods intended to maximise awareness and participation.

5.09 The consultation process included direct notification of:

- statutory consultees
- neighbouring authorities

- infrastructure providers
- environmental organisations
- landowners and agents
- businesses and community organisations
- residents registered on the consultation database

5.10 The consultation documents were published on the councils' website together with supporting information and online response forms.

5.11 The consultation was also publicised through press release and social media channels.

5.E Consultation Participation

5.12 The councils received representations from a broad range of organisations and individuals including statutory consultees, neighbouring authorities, infrastructure providers, planning consultants, environmental organisations, parish councils, community organisations and local residents.

5.13 Most statutory consultees either noted the consultation or commented on technical matters within their remit.

5.14 Technical consultees, planning consultants and development interests focused mainly on BNG implementation, mapping interpretation, legal drafting, ecological evidence, policy scope and development management implications.

5.15 Environmental organisations and community groups generally supported the direction of the documents, while seeking stronger wording on biodiversity enhancement, the mitigation hierarchy, ecological connectivity and nature recovery.

5.16 Members of the public generally supported the objectives of improving green infrastructure and biodiversity outcomes, with some raising local issues or projects.

5.17 A late representation was also received from Sussex Wildlife Trust. Although submitted after the formal consultation period closed, it was considered by officers..

6. Main Issues Raised Through Consultation

6.A Role of the SPDs and TANs

- 6.01 An issue raised during consultation related to the role and status of the documents and whether they could introduce new policy requirements or decision-making tests.
- 6.02 One representation raised concerns that aspects of the draft SPDs and TANs could be interpreted as introducing new policy requirements, creating additional decision-making tests or operating as de facto development constraints.
- 6.03 In particular, detailed comments were made regarding:
- the interpretation of LNRS-derived mapping
 - references to biodiversity “measures”
 - the use of terms such as “strategic significance”
 - wording relating to biodiversity net gain expectations.
- 6.04 The councils do not agree that the SPDs and TANs introduce new policy requirements or decision-making tests. However, additional clarification has been added to avoid misinterpretation. The final documents have therefore been amended to reinforce the status principles set out in Section 3.B, including that the documents provide guidance only, do not introduce new policy or designations, and do not predetermine planning outcomes.

6.B LNRS and ACIB Mapping

- 6.05 One representation raised detailed concerns regarding the interpretation of mapping derived from the Local Nature Recovery Strategy, particularly the “Areas that could become of particular importance for biodiversity” (ACIB) layer.
- 6.06 The respondent expressed concern that ACIB mapping could be interpreted as a designation or constraint, particularly where opportunity areas overlapped with allocated sites or previously developed land.
- 6.07 A number of detailed comments within the same representation also questioned:
- the use of LNRS terminology
 - interpretation of habitat priorities
 - the use of the term “measures”
 - how overlapping habitat priorities should be interpreted.

- 6.08 ACIB mapping is derived from the Local Nature Recovery Strategy and Local Habitat Map. It identifies strategic opportunities for habitat creation and enhancement and forms part of the wider environmental evidence base. It is not a policy designation, constraint map or decision-making test, and it does not determine planning outcomes.
- 6.09 Some terminology used within the mapping originates directly from the LNRS datasets and associated habitat mapping. Additional explanatory wording has therefore been added to avoid this terminology being interpreted prescriptively.
- 6.10 The final documents clarify that ACIB mapping identifies opportunities rather than requirements; does not operate as a development constraint; does not alter site allocations; and should be interpreted through site-specific planning judgement.

6.C Strategic Green Infrastructure Network Mapping

- 6.11 The Strategic Green Infrastructure Network is an evidence-led and non-determinative framework. It brings together evidence layers, environmental information and adopted policy considerations to support understanding of the wider green infrastructure context affecting a site. It does not allocate land, create a new policy designation, operate as a constraint map, create a presumption for or against development or predetermine planning outcomes.
- 6.12 The mapping is intended to support early site appraisal, environmental understanding and design evolution. It should be interpreted alongside site-specific technical evidence, ecological assessment, adopted policy and other material planning considerations.

6.D Biodiversity Net Gain

- 6.13 A number of representations included detailed comments regarding biodiversity net gain implementation. The principal issues raised included:
- the relationship between the statutory biodiversity net gain framework and Worthing Policy DM18
 - exemptions and thresholds
 - treatment of minor and brownfield development
 - legal securing mechanisms
 - Habitat Management and Monitoring Plans
 - Watercourse Metric requirements
 - Small Sites Metric requirements
 - strategic significance
 - competence requirements
 - duplication of national guidance

- 6.14 A number of consultation responses sought BNG requirements above existing statutory or adopted policy levels. The councils cannot use an SPD or TAN to introduce BNG targets, thresholds or burdens beyond those established through legislation or adopted policy. Any increase would need to be established through the Local Plan process and supported by appropriate evidence, consultation and viability testing.
- 6.15 Several respondents sought clarification on how the TAN would operate alongside evolving national BNG regulations and guidance. The TAN has therefore been reviewed to ensure that it supports the statutory framework in force when applications are determined, rather than establishing fixed local procedures that could become inconsistent with future national changes.
- 6.16 The final version of the TAN therefore includes amendments to:
- clarify when BNG applies, including exemptions, thresholds and transitional arrangements
 - explain the relationship between statutory and local BNG requirements
 - strengthen links to national guidance and avoid unnecessary duplication of the statutory framework
 - improve explanation of legal securing mechanisms
 - clarify when Habitat Management and Monitoring Plans may be required, rather than implying that they are universally required
 - strengthen wording on Watercourse Metric requirements
 - clarify the intended role of strategic significance
 - clarify proportionality expectations for smaller development proposals
 - avoid implying that on-site BNG is always preferable regardless of site-specific circumstances
 - clarify that off-site BNG may be appropriate where justified by site-specific circumstances and statutory requirements.
- 6.17 The councils have also amended the TAN to strengthen references to national guidance and to avoid unnecessary duplication of the statutory framework.
- 6.18 These amendments improve technical precision and reduce the risk of the TAN being interpreted as imposing requirements beyond the statutory framework.

6.E Constrained Sites and Planning Judgement

- 6.19 Several representations raised concerns regarding how competing green infrastructure, biodiversity and development objectives should be balanced on constrained sites.
- 6.20 Development proposals may need to balance a range of considerations including:

- viability
- flood risk
- heritage considerations
- urban constraints
- ecological considerations
- design quality
- operational requirements

- 6.21 The SPDs and TANs do not establish a rigid hierarchy or prescriptive formula for balancing these considerations. Instead, they rely on planning judgement and site-specific assessment. Additional wording has been added to explain that not all objectives may be achievable in full on every site, and that proposals should explain how competing considerations have been balanced.
- 6.22 The final documents also strengthen wording on constrained and previously developed sites, recognising that some brownfield sites may contain important ecological value, including Open Mosaic Habitat.

6.F Usability, Structure and Cross-Referencing

- 6.23 Several respondents commented on the length, structure and usability of the documents. They identified opportunities to improve navigation, cross-referencing, the distinction between policy guidance and technical advice, and the visibility of key implementation messages.
- 6.24 The documents address complex and interrelated technical issues. The final documents have therefore been amended to improve navigation between the SPDs and TANs, strengthen signposting to national guidance, and make key implementation messages easier to identify, while retaining sufficient context for the documents to be understood on a standalone basis.
- 6.25 Sussex Wildlife Trust also suggested that key implementation messages and mitigation hierarchy principles could be made more visually prominent for non-technical users. Where appropriate, the final documents have been amended to improve accessibility and clarity.

7. Appendices

Appendix A: Full Consultation Response Schedule

Appendix B: Schedule of Amendments Following Consultation

The appendices are published as separate documents.