

Biodiversity Net Gain (BNG) Technical Note

Stonehouse Farm, Handcross Road, Plummers Plain, May 2025

This Technical Note has been prepared by CSA Environmental on behalf of Lake Investments Ltd in relation to Stonehouse Farm, Plummers Plain (hereafter referred to as 'the Site'). This Note responds to a consultation response received from the Ecology Officer at Horsham District Council, in relation to a full planning application (Ref: DC/25/0403) for mixed used development at the Site.

1.0 BNG Approach

- 1.1 A Biodiversity Net Gain (BNG) Assessment: Design Stage Report (CSA/6746/02/2025/B) was submitted to Horsham District Council (HDC) alongside proposals for mixed use development at Stonehouse Farm. Full planning permission is sought for three separate areas of the Site, which will be delivered independently of each other. Three separate Statutory Biodiversity Metrics were run (one for each area of the Site), such that the biodiversity impact of each of the proposals could be assessed and habitat creation / enhancement requirements for each part of the Site could be clearly identified to ensure that each application could meet the 10% BNG objective independently of each other.
- 1.2 This is an important facet of the application as each area of the Site may be delivered by separate landowners / operators in the future and therefore there needs to be a clear mechanism in place (e.g. through appropriate planning conditions / obligations) to enable BNG to be secured for each phase / area of development independently. The three separate phases / areas of development proposed are referred to as follows:
 - Stonehouse Business Park (rationalisation and enhancement of existing commercial facilities)
 - Anaerobic Digester (AD) Plant and Main Livestock Building (decommissioning and change of use)
 - Jackson's Ridge (residential for 3no. detached dwellings)
- 1.3 In addition to the above proposals a Site Wide Masterplan (CSA/6746/11/H) has been prepared which provides indicative proposals for habitat creation and enhancement across the wider holding, which is it intended will be secured as part of a Habitat Bank (to

be registered in due course on the Gov.UK Biodiversity Gains Site register).

2.0 BNG Updates

Biodiversity Officer Comments Addressed

- 2.1 In response to comments received by the HDC Ecology Officer the following updates have been made to the Statutory Metric for each phase of the proposed development; and within the associated Biodiversity Net Gain Assessment: Design Stage Report (CSA/6746/02/2025/D) and accompanying Habitat Management Plan for BNG (CSA/6746/09/A).

Stonehouse Business Park

- 2.2 The following updates have been to the Statutory Metric / BNG Design Stage Report:

- Strategic Significance: post-intervention habitats to be delivered within the area covered by St Leonard Watershed Biodiversity Opportunity area (BOA) has been assigned as having 'high strategic significance'. This has resulted in a net gain of +18.86% net gain (+0.82 units) in the hedgerows module (in increase of 0.04 hedgerow units from that originally calculated). This increase is of little significance given that the required 10% net gain target was already being met.
- Condition Assessment: baseline habitat condition assessment sheets for Ruderal / Ephemeral (sparsely vegetated land) have been included within the BNG Design Stage Report.
- Management: It is noted that hedgerow (H20b), a non-native and ornamental hedgerow with trees (H2b) contains a treeline of tall Leyland cypress, with frequent cotoneaster and abundant cherry laurel. The removal of all non-native species from this hedgerow would result in the total loss of this feature, and is not considered necessary given that the required 10% net gain target is being met. It is noted that some cotoneaster species are listed under Schedule 9 of the Wildlife and Countryside Act 1981. As such, it is proposed that cotoneaster / other non-native species are removed from the hedgerows where possible (i.e. where it does not require the removal of the entire hedgerow feature) and supplemented with non-invasive / native species.

Anaerobic Digester (AD) Plant and Main Livestock Building

- 2.3 The following updates have been to the Statutory Metric / BNG Design Stage Report:

- Strategic Significance: post-intervention habitats to be delivered within the area covered by St Leonard Watershed Biodiversity Opportunity area (BOA) has been assigned as having 'high

strategic significance'. This has resulted in a net gain of +25.68% net gain (+1.78 units) in the hedgerows module (in increase of 0.08 hedgerow units from that originally calculated). This increase is of little significance given that the required 10% net gain target was already being met.

- Condition Assessment: baseline habitat condition assessment sheets for Ruderal / Ephemeral (sparsely vegetated land) have been included within the BNG Design Stage Report.

Jackson's Ridge

2.4 The following updates have been to the Statutory Metric / BNG Design Stage Report:

- Hedgerows / Linear Features: It has been confirmed that hedgerows H8 (western boundary) and H1 (northern boundary) occur outside of the redline and as such will not be included within the private ownership of any new dwellings. As such, these linear features have been removed from the Statutory Metric. The potential for impacts to retained adjacent to the proposed development are addressed separately within the Arboricultural Impact Assessment (AIA) submitted as part of the application (CSA / BHA_5975_Rev B).
- Metric Errors: Mycelia flags errors in the off-site creation tabs. These tabs have not yet been completed (as off-site unit provision has not yet been confirmed) – as such this error is irrelevant at this stage. Off-site unit provision will be secured by planning condition / obligation and will either include provision of units from the on-site Habitat Bank (if registered at that point) or purchase from another off-site provider.
- Metric Corrections: Following a further review of the Metric data, a minor discrepancy was identified in the previous calculation. In addition, there has been a small change to the red line used for the BNG assessment; with boundary hedgerows being removed from the Metric as well as some habitats along the eastern boundary of the site also being removed from the red line (to allow the adjacent Public Right of Way to be maintained outside the curtailment of private dwellings). The Metric has been updated to reflect these changes, and this has resulted in a net gain of 0.14 Habitat Units being calculated, which equates to +32.56%. However, this is considered to have limited impact on the overall conclusions of the Assessment as a trading error for 'medium' distinctiveness scrub habitat remains that needs to be compensated for off-Site.

Draft HMMP

2.5 The Ecology Officer notes that no draft (overall) Habitat Management and Monitoring Plan (HMMP) has been provided. This is incorrect, a Habitat Management Plan for BNG (CSA/6746/09) was prepared as part of the submission, indeed it was a validation requirement. This document

has been updated to reflect the minor changes to the Statutory Metrics identified above (see CSA/6746/09/A).

- 2.6 It is noted that the Ecology Officer has requested that individual HMMPs should also be provided within the Biodiversity Gain Plans for each phase of development. Provision can be secured through an appropriately worded planning condition / obligation. This would also indicate that delivery of BNG can be secured independently for each phase of development, and therefore no overall Statutory Metric is required to be submitted.

3.0 Summary

- 3.1 Following comments from the Ecology Officer minor amendments to the Statutory Metrics have been made for each phase of development, with regards to strategic significance, and clarity provided on hedgerow units to be delivered at Jackson's Ridge.
- 3.2 It has been demonstrated that development phases at Stonehouse Business Park and the Anaerobic Digester will deliver in excess of 10% BNG for habitat and hedgerow units. A trading error for 'medium' distinctiveness scrub habitat has been identified for Jackson's Ridge due to the loss of mixed scrub and bramble scrub, with no units being delivered due to all parts of the site proposed to be in private ownership. Whilst the trading error could be accounted for within other phases of the scheme, the applicant does not wish to undertake this in order to keep BNG provision across each phase of the development separate. As such the unit deficit will be met by the purchase of off-site units either from the proposed Habitat Bank at Stonehouse Farm or elsewhere.
- 3.3 It is considered that the above can be secured by way of a suitably worded planning condition / obligation.