

**Job Name:** Land North of Guildford Road, Bucks Green, Rudgwick

**Date:** 22<sup>nd</sup> December 2025

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**Subject:** Ecological Technical Note – Response to the LPA Ecology Comments

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Please find the second response to the following with regards to the Horsham District Council request for further information regarding BNG for the planning application ref DC/25/1269 dated 17/12/2025. HDC comments are in *italics* with The Ecology Partnership comments below.

*The ecologist has provided additional reasoning as to the change in condition of the modified grassland (from good to moderate). This reasoning pins on the fact that if Condition Criterion E fails due to cattle poaching of an area greater than 10% of the habitat parcel (as deduced during the survey undertaken in May 2024), then criterion D would also fail by default and this was previously missed. In principle, this is agreed. However, the mapped parcel of cattle poaching on Figure 1 demonstrates that an area of 0.0718ha is impacted out of a total parcel of 1.2004ha. This does not exceed 10% of the site (approx. 0.12ha), as per the requirements to fail Criterion E. However, it does still fail Criterion D. Also, by this logic, field F2 should also be failing Criterion D if the same instance applies. However, it is acknowledged that genuine error does occur, and there may be discrepancies between mapping and on-site survey. The additional ~500sqm of cattle poaching needs to be identified for this argument to be accepted*

Yes, this was a genuine error, and unfortunately, I have in my previous response confused things, which I apologise for as I have confused E and D again. However, for ease of reference I have reviewed and rewritten the last response, but have clarified E and D thought process in a more coherent manner. I trust this is now clearer for everyone.:

As stated in our previous response, the review of the site conditions was based on review of the technical data and reports we conducted in 2024 to support the application. This is not based on new evidence. When submitted, the condition 'E' of the grassland, which states '*cover of bare ground is between 1% and 10% including localised areas (for example, a concentration of rabbit warrens?)*' was failed, as the site was estimated to support over 10% poached ground within this grassland, albeit this was not

specifically detailed in the report. However, upon more accurate measurement of the poached area using mapping services, it was found that an area of 0.0718ha of land had been poached by cattle, making up >5% of the total grassland area. This would fail condition 'D', '*Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities'*' which was overlooked in the previous assessment. Presence of >5% poached/bare ground would technically fulfil the requirement of condition 'E', as this area would fall within the 1% – 10% bare ground allowable limit, resulting in a pass for this criterion. However, it is assumed that bare ground in the context of condition 'E' is intended as a positive attribute to a grassland within the given limits, assumed to relate to creation of an ecological niche for more diverse herbaceous colonisation. Allowing damaged poached ground – a negative attribute – to fulfil this positive criterion was not considered to accurately reflect the conditions present on site. Therefore, the area of bare ground on site considered suitable as a positive attribute was deemed to be <1% and to fail condition 'E' as well. This was justified in brief in our condition assessment table within the BNG report document Appendix 1 which states, 'Fail – poached ground only'.

As such we consider that this is an error that needed to be rectified, especially due to the swing in terms of the net gain, which is wholly reliant on the quality of the grassland. This 'moderate' condition grassland is considered an accurate description of the baseline. The grassland has reached the essential criteria and many of the other criteria, due to the site's use by grazing. However, with cows and the management of the cows, sections of the site, as detailed previously, were bare earth, with areas concentrated around the margins being heavily poached to due the cows. This is shown in the technical note previously submitted.

It is considered that 'moderate' condition grassland is the most appropriate measure of this field. As such, a net gain is achieved for habitats. However, it is acknowledged that the hedgerow units will have to be purchased off site.

*The agent has confirmed an additional attenuation crate has been inserted in the system 'up stream' of the one located on the boundary. This is located under the car parking area of Unit 28. This has allowed the crate by the boundary to be re-sized so that it keeps 1.5m minimum from the hedgerow. An updated drainage strategy has been submitted to illustrate these changes. The increased 1.5m distance from the hedgerow is welcome. However, the concerns relating to installation of the attenuation crate and encroaching on tree root barriers still stand. Therefore, the retention of this tree remains uncertain.*

