

Biodiversity Net Gain

Assessment

Mill Farm, Mill Lane,
Itchingfield

**South
Downs
Ecology**

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Quality Assurance			
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Client:	The Owners		
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Report conditions:	The content is provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. The methods and recommendations in this report are based on the following: • CIEEM Guidelines for Ecological Report Writing (CIEEM, 2017) • Biodiversity Net Gain (BNG) Report & Audit Templates Version 1 (CIEEM, July 2021) • Natural England (2025). The Statutory Biodiversity Metric User Guide.		

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1. Executive Summary

The following report has been compiled for proposals for replacement of 2no. agricultural buildings with dwellings.

Following an assessment of the proposals and the proposed enhancements, it is determined that the proposals could result in Biodiversity Net Gain and accord with the requirements of the Environment Act (2021).

The proposals could easily achieve a habitat area gain of 39.02% and a hedgerow gain of 25.05%. These are both well above the required 10% minimum and easily-achievable.

The proposed enhancements are not considered 'significant' and their planting and retention would not require a Habitat Management and Monitoring Plan at the condition stage. The on-site habitats are low distinctiveness and the hedgerows are medium distinctiveness but proposed only in poor condition. The LPA can secure the gains via condition, provided the land for the Biodiversity Gains is secured outside the curtilage of any private residential property.

2. Introduction

2.1 Background and Site Description

The applicant has commissioned a Biodiversity Net Gain (BNG) Assessment for the proposed replacement of 2no. agricultural buildings at Mill Farm with dwellings.

The habitats on-site consist of an existing area of modified grassland with the remainder being developed land. A hedgerow with trees, and ecologically-valuable line of trees are present on-site.

The site is not within or adjacent any designated sites, or Biodiversity Opportunity Areas (BOAs). The site is not listed on the Horsham Recovery Network Maps.

No irreplaceable habitats are present on-site. Irreplaceable ancient woodland is close to the site, but proposals are designed to result in a minor net benefit and reduction of impacts on the woodland and as such, this is not included within this assessment. Some minor degradation has occurred prior to this application in the form of removal of a small section of hedgerow. For the purposes of this assessment, historical aerial imagery and the condition assessment of the remaining hedgerow have been used to devise an appropriate baseline habitat type and condition for this.

2.2 Proposals

The proposals involve the replacement of artificial unvegetated, unsealed surface and buildings, with new developed land, buildings, vegetated garden. Existing modified grassland in poor condition would be enhanced to moderate condition (or a higher-distinctiveness habitat such as mixed scrub, traditional orchard or neutral grassland) in the Biodiversity Enhancement area.

2.3 Scope of Assessment

This BNG Assessment is valid for a maximum of one year. If there are any alterations to the site conditions, BNG methodologies, or the proposals, the calculations are likely to become invalid, and an ecologist should be contacted for advice.

3. Legislation and Policy

3.1 Legislation

The Environment Act 2021 requires developments to deliver a minimum of 10% BNG. The requirement applies to most non-householder planning applications that result in the loss of more than 25m² of vegetated habitat. Developers must calculate BNG using the Biodiversity Metric and secure it for a minimum of 30 years. Options for achieving BNG include on-site measures, off-site enhancements recorded in a national biodiversity gain site register, or the purchase of statutory Biodiversity Credits. Secondary legislation under the Act sets out the procedural and technical requirements, including Habitat Condition Assessments using the Department for Environment, Food & Rural Affairs (DEFRA) methodology and the submission of a completed Statutory BNG Metric. Long-term management of BNG must be secured, e.g. through Section 106 agreements or Conservation Covenants.

3.2 National Policy

Paragraph 187 of the National Planning Policy Framework (NPPF, 2024) states the need for planning policies and decisions to enhance the natural and local environment. The NPPF highlights the importance of minimising impacts of development on wildlife and providing net gains for biodiversity.

3.3 Local Policy

The Emerging Horsham Local Plan will support delivery of at least 10% gain. Details of how Horsham currently deals with BNG can be found at:

<https://www.horsham.gov.uk/planning/planning-applications/biodiversity-net-gain>

4. Methods

4.1 Desk Study

The Multi-Agency Geographic Information for the Countryside (MAGIC) online resource was accessed on 8th March 2026 to search for Protected and Priority Habitats, or Habitats of Principal Importance listed under the NERC Act on-site or within 500.0m.

4.2 Site Assessments

A site visit was conducted in August 2025 and detailed site information collected by George Sayer (MCIEEM, MArborA). George is an experienced Senior Lead Ecologist and a Full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). He has been undertaking ecology surveys and botanical assessments since 2016.

The habitat classification and assessments were completed using existing site drawings and photographs, in combination with digital resources, including aerial imagery from Google Earth and mapping from magic.gov.uk. Given the nature of the site, it is extremely unlikely that any changes have occurred on-site since the initial walkover was undertaken.

Habitats were classified in accordance with the UK Habitat Classification System v2.01 (UKHab Ltd 2023) and assessed using Defra's Statutory Biodiversity Metric (2025). The classifications are illustrated on the Site Baseline Habitat Plan, produced using Landapp. See Figure 5.1. A proposal plan is provided, produced in AutoCAD 2022. See Figure 5.2.

Condition Assessment has been completed using the Statutory Metric - Condition Assessment Sheets (2025). Where any uncertainty arises as to the condition or passing/failing of any criteria, a precautionary approach has been adopted and the higher value used.

New habitats have been identified and assessed in accordance with the Site Plan. At this time, proposed habitat creation and enhancement are extremely modest, to demonstrate the ability to achieve a gain. In reality, habitats created could be of higher distinctiveness or condition.

5. Results

The site is not situated within any Biodiversity Opportunity Areas (BOAs), strategic wildlife corridors, or designated enhancement network zones and is not shown on the Horsham District Nature Recovery Networks Map. Consequently, all habitats on-site are classified as having low strategic significance.

5.1 Area Habitats

Baseline Habitats		
The site is composed of the following habitats: - o 0.115 ha of Artificial Unvegetated, Unsealed Surface (Track and bare spaces) - o 0.02 ha of Developed Land (Buildings) - o 0.248 ha of Modified Grassland, poor condition (edge of paddock)		
Retained Habitats		
- o 0.081 ha of Artificial Unvegetated, Unsealed Surface (Track) - o 0.068 ha of Modified Grassland, poor condition (edge of paddock)		
Proposed On-Site Habitats		
The following habitats are proposed as part of the development: - o 0.042 ha of Developed Land; Sealed Surface (buildings and parking) - o 0.056 ha of Vegetated Garden, condition N/A (gardens) - o 0.131 ha of Modified Grassland, poor condition enhanced to moderate condition		
Habitats Summary		
On-site - o The existing site has a baseline of 0.5 Habitat Units. See Figure 5.1. - o The proposals on-site will result in a gain of 0.19 Habitat Units (+39.02%). Therefore, it does achieve the mandatory +10%.		
	Total Net Unit Change	Total Net % Change
	+0.19 Habitat Units	+39.02%

5.2 Hedgerow Habitats

Baseline Habitats		
The site is composed of the following hedgerows:		
- o 0.1 km of native hedgerow with trees, moderate condition - o 0.01 km of ecologically-valuable line of trees, moderate condition		
Retained Habitats		
- o 0.06 km of native hedgerow with trees, moderate condition - o 0.01 km of ecologically-valuable line of trees, moderate condition		
Proposed On-Site Habitats		
The following hedgerows are proposed as part of the development:		
o 0.14 km of native hedgerow with trees, poor condition		
Habitats Summary		
On-site		
- o The existing site has a baseline of 0.88 Hedgerow Units. See Figure 5.1. - o The proposals on-site will result in a gain of 0.22 Habitat Units (+25.05%). Therefore, it does achieve the mandatory +10%.		
Total Net Unit Change		Total Net % Change
+0.3 Habitat Units		+25.05%

Figure 5.1: Site Baseline Habitat Plan (N.B. includes eastern section of hedgerow removed but included in assessment as degradation)

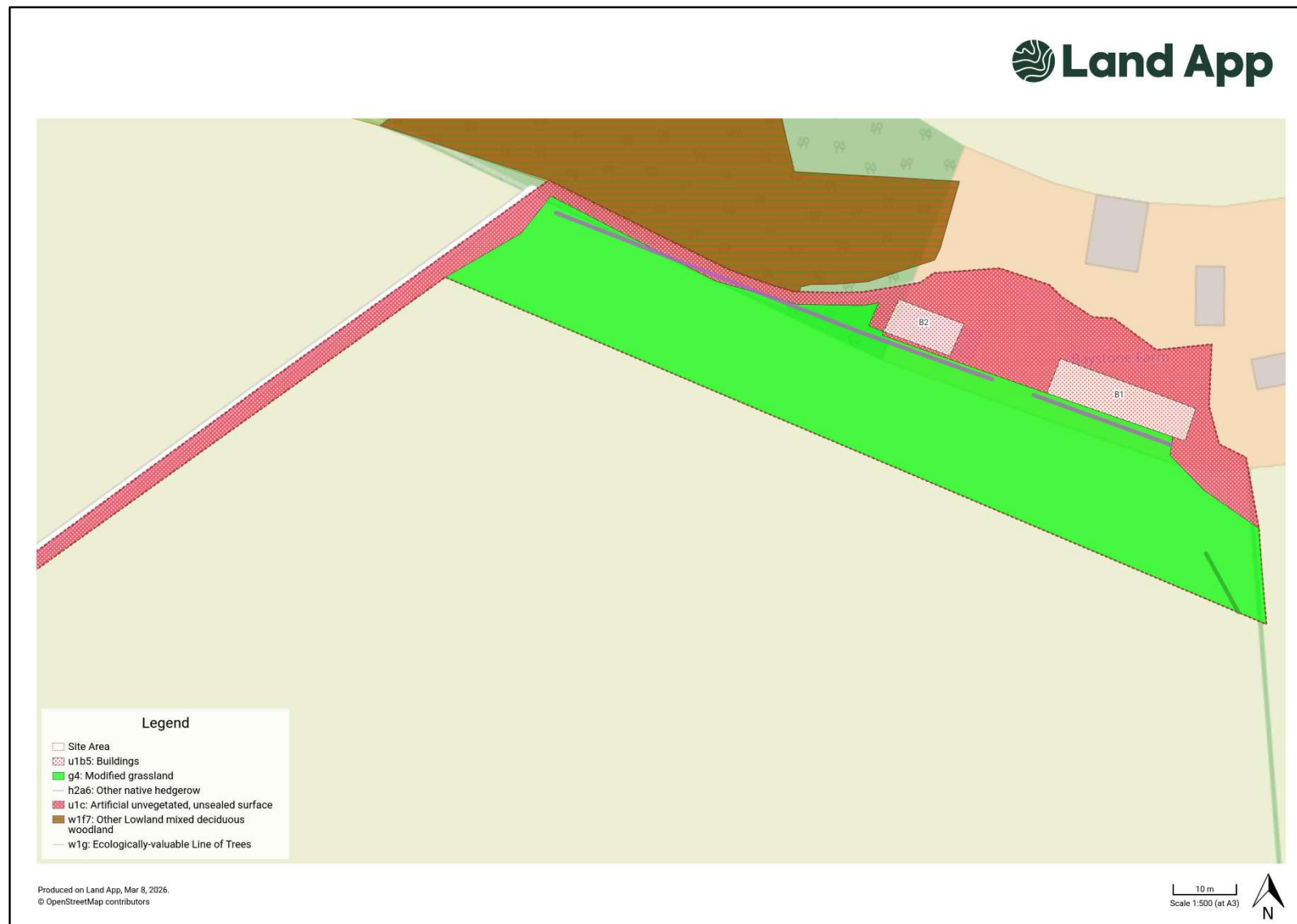
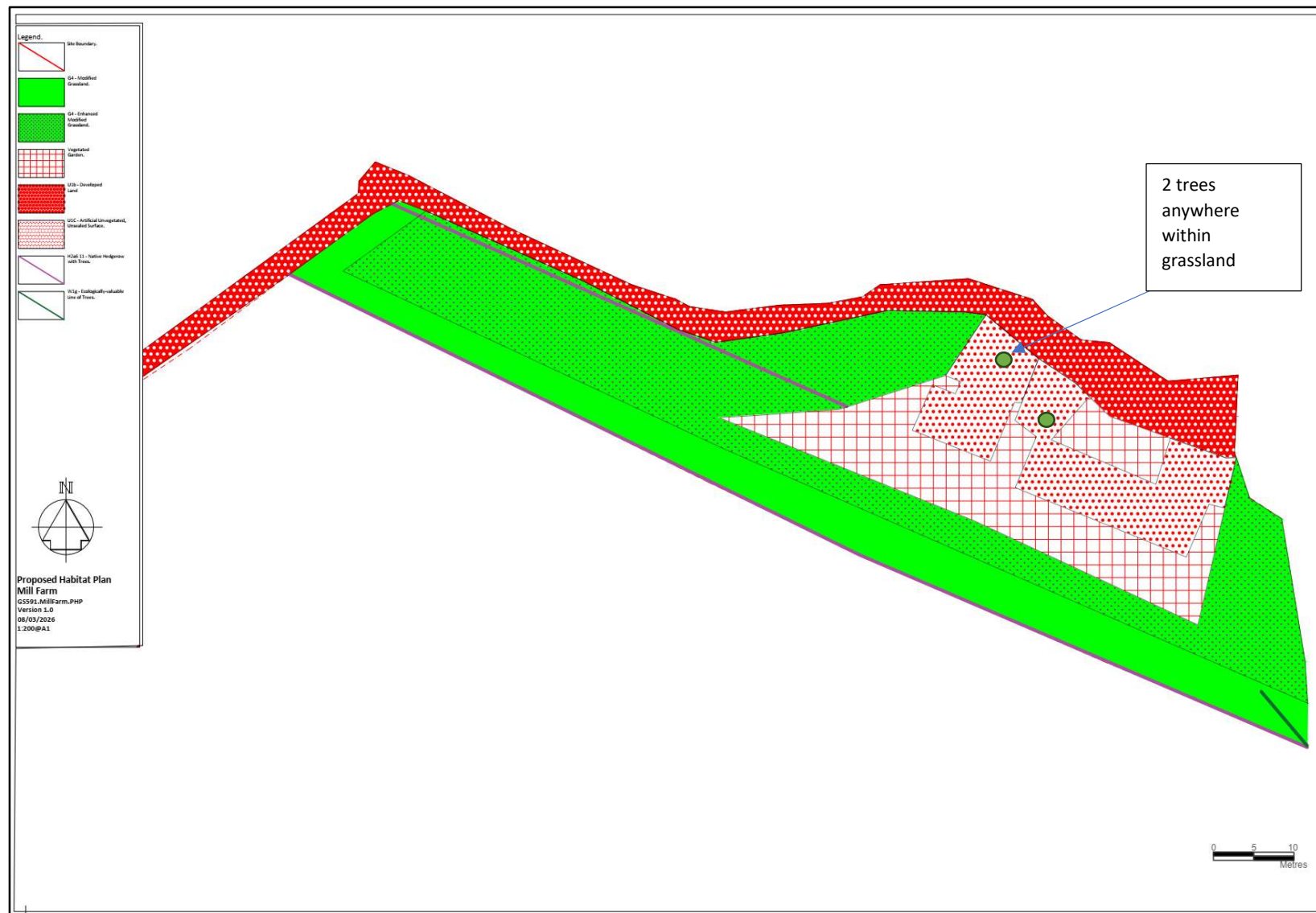


Figure 5.2: Proposed Site Plan



6. Habitat Creation, Management and Monitoring

The proposals include planting of a native hedgerow with trees, which only needs to achieve poor condition, and enhancement of existing modified grassland from poor to moderate condition. Such enhancement could be achieved by the in-seeding with a flowering lawn or general-purpose meadow mix, which could be harrowed or drilled into the soil. Following this the grassland could be managed as desired, preferably in the manner of a traditional meadow with a late-summer hay cut.

These proposals are considered achievable and reasonable, and would not be considered 'significant' and as such, would not need to be secured through a Habitat Management and Monitoring Plan. Whilst other habitats of higher distinctiveness or condition, such as neutral grassland, mixed scrub, or traditional orchard could also be created, the proposals as they stand demonstrate the ease of achieving a gain on-site.

The proposed planting and enhancement lie within the redline boundary; provided these are kept outside any private residential curtilage, the gain can be secured by condition and no legal agreement, monitoring schedule or charge are necessary.

7. Site Aerial



8. Site Plan



Produced on Land App, Dec 15, 2025.
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10 m
Scale 1:500 (at A3)
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