

Nikolas Antoniou
Chartered Town Planner
NJA Town Planning Limited

VIA EMAIL ONLY

20th October 2025

Ref: DFTHK/PP/NA01

Dear Nik,

RE: POUND PLACE MILL LANE PARTRIDGE GREEN WEST SUSSEX – BNG INFORMATION

Further to our recent conversation, please find below the additional information requested by Horsham District Council in relation the BNG Metric for the above Site.

It should be noted, however, that Defra's advice on BNG is that the statutory framework involves the discharge of the biodiversity gain condition following the grant of planning permission, hence it would be generally inappropriate to refuse an application on the grounds that the biodiversity gain objective will not be met. (Defra Guidance 019 Reference ID: 74-019-20240214). Furthermore, Defra highlight that on smaller sites where the existing habitats impacted have a low biodiversity value and the scope for onsite enhancements is limited it may not be appropriate to request a substantive amount of information from applicants, and may want to rely on the minimum information requirements. In some cases, further details (such as landscaping) may only be approved as a subsequent matter (for example approval of conditions following the grant of planning permission) following the grant of planning permission therefore it may not be proportionate to request all this information at the planning application stage.

It is also worth considering the proportionality clause within Section 5.5 of BS42020: 2013, which states "*the decision maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question*".

BNG Statement

The Site, pre-development, contains 3.3235 Habitat Units and 1.6800 Hedgerow Units. Post development this will increase to 3.7181 Habitat Units and 2.2682 Units through the enhancement of the area of retained grassland and woodland with the introduction of a more ecologically sensitive management regime. It is also proposed to plant 45 small trees and 2 medium trees around the edge the development.

Detailed landscape plans are not available; these will be developed post permission. However, given the size of the Site, the planting of this number of trees is easily achievable.



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The hedgerows that run either side of the proposed drive will be re-enforced with appropriate planting and then managed in an ecologically sensitive manner.

BNG Metric

A pdf of the metric is attached as requested.

Habitat Management and Monitoring Plan

As a detailed landscaping scheme for the site is yet to be developed, a detailed management plan cannot be provided; this would generally be submitted as a post permission condition. However, within the existing woodland, underplanting will be undertaken to increase the structural diversity. Consideration will also be given to improving the ground flora by sowing appropriate wildflower seed or plug planting.

Along the driveway, the verges will be managed as species rich grassland, whilst the hedges themselves will be re-enforced through new planting, eliminating any gaps. They will then be managed on a rotational basis, keeping them at height of 2.5 – 3m and a width of 1.5m, with a dense structure.

Full details of on-going management and monitoring would be submitted in a post permission HMMP.

I hope you find this useful, but if you require any additional information, please do not hesitate to contact me.

Regards,

For and on behalf of Derek Finnie Associates Ltd.



Derek Finnie CEnv MEnvSc MCIEEM
Managing Director

Enc.

