



BIODIVERSITY NET GAIN STATEMENT

Clock House Farm, Stonehouse Lane, Cowfold

On behalf of: The Camelia Botnar Foundation

Client:	The Camelia Botnar Foundation			
Project:	Clock House Farm, Stonehouse Lane, Cowfold			
Reference:	LLD3317-ECO-REP-004-00-BNG			
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Validity:

This report is valid for 18 months from the date of the final survey visit. If works have not commenced by this date, an updated site visit should be carried out by a suitably qualified ecologist to assess any changes in the habitats present on site, to inform whether surveys should be updated.



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1.0 INTRODUCTION

1.1 Lizard Landscape Design and Ecology has been commissioned to provide a Biodiversity Net Gain Statement for Clock House Farm, Stonehouse Lane, Cowfold. This report has been written with due regard to best practice guidance for ecological report writing (CIEEM, 2017) and the Biodiversity Net Gain: Good Practice Principles for Development (CIEEM, 2019) and the Biodiversity Net Gain User Guide (DEFRA, 2023).

1.2 The development does not appear to qualify under any exemption and will therefore be subject to the standard Biodiversity Gain condition.

Site Overview

1.3 The site covers an area of c. 0.7ha and consists of a roughly rectangular plot which contains 7no. farm buildings with areas of associated hard standing. Due to lack of use, successional vegetation has begun to dominate some areas of the site. Boundary habitats of the site consisted of bramble and mixed scrub with several individual trees. Several residential buildings are located immediately to the east, with agricultural land surrounding the site in all other directions. A line of trees to the east connects the site to an area of woodland and an extensive network of hedgerows.

Surrounding Landscape

1.4 The site is located within a rural setting, with the village of Cowfold located c.1.5km east of the site. Station Road, which joins Stonehouse Lane is located c.0.6km north of the site and is the nearest major road. The surrounding landscape is arable, with fields surrounding the site on all sides. 2no. parcels of deciduous woodland, some of which is ancient, is located to the west and southwest of the site, separated by arable farmland. These woodlands are located c.130m west of the site and c.140m southwest of the site respectively. The underlying substrates on site consist of slowly permeable seasonally wet, slightly acid but base-rich loamy and clayey soils.

Development Proposals

1.5 It is understood that the proposals are for the renovation of the existing buildings and development of vacant land to include landscaped planting and parking areas.

2.0 METHODOLOGY

2.1 Desk Study - Assigning Strategic Significance

- 2.1.1 Due to the lack of Local Nature Recovery Strategy (LNRS) within West Sussex, strategic significance has been assessed as per table 8 of the User Guide (DEFRA, 2023). This included utilising the West Sussex draft LNRS which was opened for public consultation in October 2025, as well as examining the local plan for any specific targets regarding creation or retention of certain habitat types.

This included assessing whether the site was located within a Biodiversity Opportunity Area (BOA) or Area of Outstanding Natural Beauty (AONB), as well as examining the local plan for any specific targets regarding creation or retention of certain habitat types

- 2.1.2 Where sites were found to be located within any designated area, such as Areas of Particular Importance for Biodiversity (APIB) or an Area that Could become of particular importance for Biodiversity (ACB), policy statement and management plans for the relevant area were examined. High strategic significance was then assigned to any habitat identified as a priority within these documents.
- 2.1.3 For any sites not located within a designated area, habitats were generally assigned low strategic significance, unless they were considered to provide important ecological linkages in which case they were assigned medium strategic significance.

2.2 Desk Study – Statutory Designated Sites and Irreplaceable Habitat

- 2.2.1 To identify any designated sites for nature conservation, irreplaceable habitat and/or priority habitats (the presence of which may influence the feasibility of delivering BNG) within or adjacent to the Site, the Multi-Agency Geographic Information for the Countryside (MAGIC) and The Woodland Trust's Ancient Tree Inventory (2024) were reviewed.

2.3 Baseline Habitat Assessment

- 2.3.1 A baseline habitat assessment in accordance with the UK Habitats Classification Manual (UKHabs Ltd., 2023) was undertaken on the 17th of March 2026 by Ben Lapham. No habitat degradation had taken place prior to the survey and the baseline data is considered to be an accurate reflection of the ecological value of the site. Full details of the habitats present are contained within the Ecological Impact Assessment (LLD3317-ECO-REP-003-00-EclA) and summarised herein.
- 2.3.2 All area based and linear habitats were mapped on site with the aid of aerial imagery and topographical survey where available. The condition of habitats was assessed in accordance with *The Statutory Biodiversity Metric - Technical Annex 1: Condition Assessment Sheets and Methodology* (DEFRA, 2023).
- 2.3.3 The habitats, their condition and strategic importance were input into the Statutory Biodiversity Metric Calculation Tool (DEFRA, 2023). The area of habitats which would be retained or enhanced based upon the current proposals was also added to the calculator. This allowed the existing baseline value and loss of biodiversity units to be established.

2.4 Post-Development Habitats

- 2.4.1 The proposed landscape plan has been used to inform the post-development scenario. This plan was converted from CAD software to a GIS environment where it was overlaid on the baseline habitat data. Areas of proposed post development intervention (habitat creation and/or habitat retention / enhancement), including the built development, were calculated using QGIS.
- 2.4.2 The proposed habitats and strategic importance were input into the Statutory Biodiversity Metric Calculation Tool (DEFRA, 2023). Target condition scores were assigned based upon what could realistically be achieved on site. The area of habitats which would be retained or enhanced based upon the current proposals was also added to the calculator.

2.4.3 The Metric takes into account whether habitat creation or enhancement is delivered in advance of any impact, or whether there will be any significant delay in an intervention relative to the impact. Where delays in habitat creation are anticipated, or habitat creation is to be undertaken in advance, this has been included within the metric and fully explained within section 3 of this report. Where no delays or advance creation shall occur, a standard temporal multiplier has been applied to created habitats.

2.4.4 Once all measures have been input into The Biodiversity Metric Calculation, the overall change in value of the site could then be determined.

2.5 Mitigation Hierarchy

2.5.1 Biodiversity net gain planning practice guidance and Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, sets out a list of priority actions to ensure adherence to the Biodiversity Gain Hierarchy:

- First, in relation to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and
- Then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.

2.6 Survey Constraints / Considerations

2.6.1 Areas and linear lengths have been rounded to the nearest 10m² and measurements input to the metric using three decimal places. Due to the output of the Metric being displayed to two decimal places, slight imprecision in output may occur.

3.0 RESULTS

3.1 Strategic Significance, Irreplaceable Habitat and Designated Sites.

3.1.1 The site is not within any ecological designation, such as a *Biodiversity Opportunity Area* or *Nature Improvement Area* and no habitats on site are directly referenced in any local plan or other such document. Habitats on site have therefore been classified as being of low strategic significance.

3.1.2 There is no irreplaceable habitat within or immediately adjacent to the site.

3.1.3 The site is not location within any statutory designated site.

3.2 Baseline Habitat Value

Habitat Degradation

3.2.1 No site clearance or habitat degradation was evident, and the baseline information gathered is considered to be a true presentation of the on-site habitats at the time of the survey.

Existing On-Site Habitats

3.2.2 The Biodiversity Net Gain (BNG) assessment concluded that the existing baseline biodiversity value of the site was **5.39** Habitat Units, consisting of:

- 0.229ha of vacant or derelict land in good condition providing 1.37 habitat units;
- 0.048ha of vacant or derelict land in moderate condition providing 0.19 habitat units;
- 0.436ha of developed land; sealed surface providing 0 habitat units (condition assessment N/A);
- 0.121ha of bramble scrub providing 0.48 habitat units (condition assessment N/A);
- 0.2484ha of individual trees in good condition providing 2.98 habitat units;
- 0.0448ha of individual trees in moderate condition providing 0.36 habitat units.

- 3.2.3 A full condition assessment for each existing habitat type is detailed in Appendix A.

Habitat Retention

- 3.2.4 Some of the existing habitat on site is to be retained in its current condition, meaning the retention of 3.31 habitat units comprised of:

- 0.436ha of developed land; sealed surface
- 0.2484ha of individual trees in good condition providing 2.98 habitat units.
- 0.0407ha of individual trees in moderate condition providing 0.33 habitat units.

3.3 Baseline Hedgerow Value

- 3.3.1 No linear habitats are present on site.

3.4 Baseline Watercourse Value

- 3.4.1 No watercourses are present on site.

3.5 Proposed Habitat Creation

- 3.5.1 Proposals are to result in the creation of new habitats on site. The proposed habitats would result in the provision of would deliver **1.76** habitat units and include:

- 0.042ha of developed land, sealed surface which includes new areas of hard standing for access.
- 0.118ha of introduced shrub (condition assessment N/A) providing 0.23 habitat units. This will consist of extensive landscaped areas throughout the site.
- 0.08ha of vegetated garden providing 0.15 habitat units.
- 0.158ha of mixed scrub in moderate condition providing 1.06 habitat units. This habitat will be located around the western boundary of the site.

- 0.1059ha of individual trees in moderate condition providing 0.32 habitat units. These will be planted throughout the site and be native species selected from the Hilliers 'Streetwise' range to enhance climate resilience.

3.5.2 Condition assessment of all proposed habitats other than the new trees and mixed scrub is not applicable and a standard score has been assigned to these habitats. The proposed trees and mixed scrub habitats have been assigned a target condition of 'moderate' which is considered to be achievable within the context of the site.

3.5.3 A full target condition assessment for each proposed habitat creation type is detailed in Appendix B.

3.6 Proposed Hedgerows / Watercourses

3.6.1 No new hedgerows or watercourses are proposed within the scheme.

3.7 Proposed Habitat Enhancements

3.7.1 No habitat enhancement measures are proposed within the scheme.

3.8 Adherence to the Mitigation Hierarchy

Avoidance and Mitigation

3.8.1 The scheme has been designed to avoid impacts to the majority of individual trees (a medium distinctiveness habitat) by limiting the requirement for any new areas of hard standing.

Compensation

3.8.2 Due to the type of habitats on site, it was not practical to enhance any habitats while also allowing for development. 26no. trees have been planted throughout the site to generate as many on site habitat units as possible.

3.9 Trading Summary

3.9.1 Trading rules have not been satisfied due to the shortfall in habitat units.

3.10 Overall Results

- 3.10.1 Once all retention, enhancement and habitat creation measures are taken into the account, the scheme currently results in the delivery of **5.07** Habitat Units, resulting in a net decrease of 0.32 units and a **biodiversity net loss of 5.92%**.
- 3.10.4 As some of the on-site gains are significant, a formal Habitat Management and Maintenance Plan (HMMP) will be required. The significant on-site gains are comprised of the proposed area of mixed scrub which is a medium distinctiveness habitat.

4.0 MEASURES TO ACHIEVE MINIMUM REQUIRED LEVELS OF BNG

- 4.1 The scheme currently does not meet the mandatory minimum 10% net gain in habitat units.
- 4.2 Proposals currently result in a deficit of 0.86 habitat units. Trading rules for medium distinctiveness habitats are met, but low distinctiveness habitats are not currently met due to the deficit in units.
- 4.3 The purchase of units from a private habitat provider, such as Nature Impact, shall be sought to allow the shortfall in units to be addressed. Purchased units shall include a minimum of 0.86 units of a low distinctiveness habitat type to ensure that all trading rules are met. This approach is in accordance with Government guidelines, with the completion of a full metric with inclusion of off-site habitats provided pre-commencement as part of the standard Biodiversity Gain Condition.

5.0 CONCLUSION

- 5.1 Metric calculations have identified that the proposed scheme currently does not result in a minimum of +10% Biodiversity Net Gain in Habitat Units, however habitat units shall be purchased from a third-party provider to satisfy the current deficit and ensure that the current proposals abide by the trading rules.
- 5.2 To ensure the above habitats are managed into the future, a suitable Habitat Creation Management and Monitoring Plan (HMMP) should be produced. This should include management prescriptions for new habitat areas including aspects such as mowing regimes, which shall ensure the target conditions are achieved. The HMMP should include details of monitoring intervals and methods for the 30-year period to ensure that the target conditions are achieved. These measures shall ensure that the scheme accords with The Environment Act 2021, and can be secured by the standard Biodiversity Gain pre-commencement planning condition.

6.0 REFERENCES

CIEEM. (2017). *Guidelines on Ecological Report Writing*. Chartered Institute of Ecology and Environmental Management, Winchester.

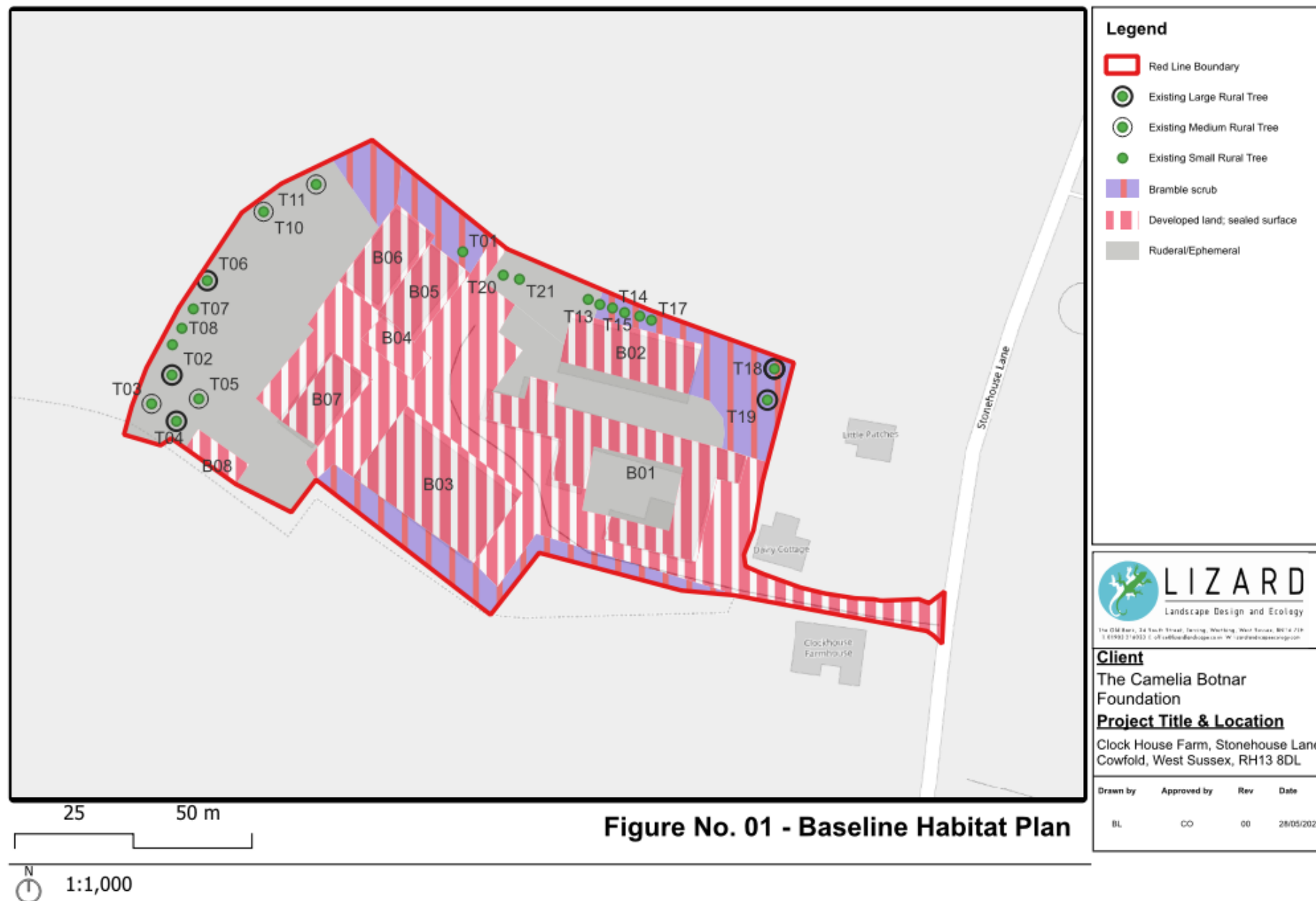
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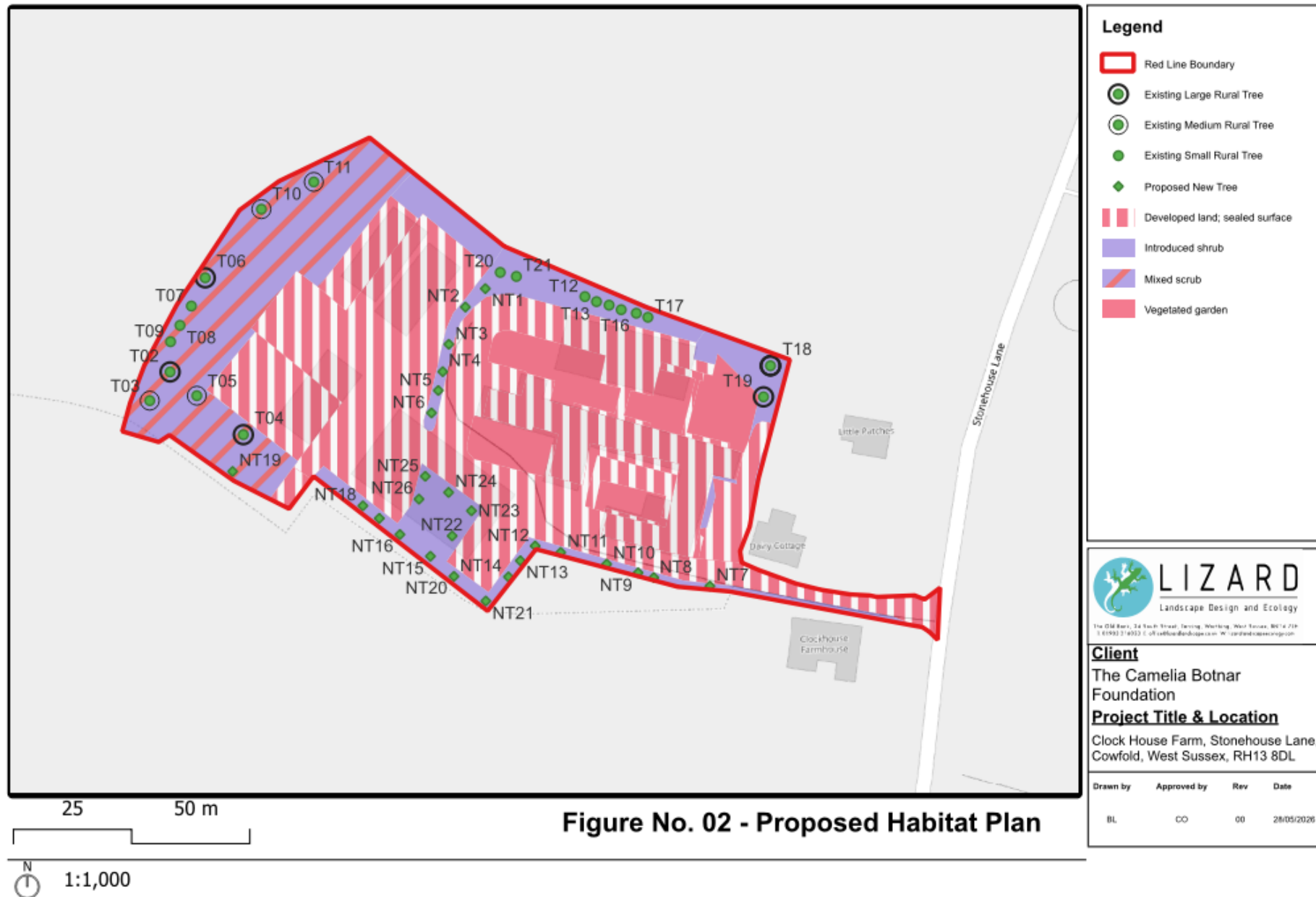
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Appendix A – Condition Assessment for Existing Habitats

Vacant and Derelict Land in Moderate and Good Condition:

Limitations (if applicable)	Habitat parcel reference										
	SV1	SV2	SV3								
	Grid reference										
Condition Assessment Criteria											
		Criterion passed (Yes or No)									
Core Criteria - must be assessed for all urban habitat types :											
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	Yes	Yes	Yes							Varied vegetation structure
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Yes	Yes	Yes							Plentiful nectar sources
C	Invasive non-native plant species (listed on Schedule 9 of WCA ¹) and others which are to the detriment of native wildlife (using professional judgement) ² cover less than 5% of the total vegetated area ³ . Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	Yes	Yes	No							SV3 contained Buddleja
Essential criteria relevant for habitat type achieved (Yes or No)		Yes	Yes	No							
Number of criteria passed		3	3	2							
Condition Assessment Result	Condition Assessment Score	Score Achieved x/√									
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):											
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C.	Good (3)	X	X								
• Passes 2 of 3 core criteria; OR • Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)			X							
• Passes 0 or 1 of 3 core criteria.	Poor (1)										

Existing Individual Trees in Good and Moderate Condition:

Limitations (if applicable)		Habitat parcel reference										
		Large & medium	Small									
Condition Assessment Criteria		Grid reference										Notes (such as justification)
		Criterion passed (Yes or No)										
A	The tree is a native species (or at least 70% within the block are native species).	Yes	Yes									All trees native
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Yes	Yes									Continuous canopies for all trees
C	The tree is mature (or more than 50% within the block are mature) ¹ .	Yes	No									Small trees (T1, T7, T8, T9, T12-17, T20, T21) not mature.
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Yes	Yes									No adverse impact
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Yes	No									Small trees had no niches
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Yes									All trees oversailing vegetation
Number of criteria passed		6	4									
Condition Assessment Result (out of 6 criteria)	Condition Assessment Score	Score Achieved */√										
Passes 5 or 6 criteria	Good (3)	√										
Passes 3 or 4 criteria	Moderate (2)		√									
Passes 2 or fewer criteria	Poor (1)											

Appendix B – Target Condition Assessment for Proposed Habitats

Mixed Scrub in Moderate Condition

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range). ¹ - At least 80% of scrub is native, - There are at least three native woody species ² , - No single species comprises more than 75% of the cover (except hazel <i>Corylus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> (only in its restricted native range), or box <i>Buxus sempervirens</i> , which can be up to 100% cover).	Yes	Wide variety of native species to be used
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran ³) shrubs are all present.	No	Cannot guarantee variety of age classes within 30 years
C	There is an absence of invasive non-native plant species ⁴ (as listed on Schedule 9 of WCA ⁵) and species indicative of suboptimal condition ⁶ make up less than 5% of ground cover.	Yes	No INNS present, management to ensure this
D	The scrub has a well-developed edge with scattered scrub and tall grassland and/or forbs present between the scrub and adjacent habitat.	No	Parcel not of sufficient size to allow ecotones
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Yes	Small clearing to be incorporated
Number of criteria passed			3
Condition Assessment Result (out of 5 criteria)	Condition Assessment Score	Score Achieved x/√	
Passes 5 criteria	Good (3)		
Passes 3 or 4 criteria	Moderate (2)	√	
Passes 2 or fewer criteria	Poor (1)		