
Biodiversity Net Gain Exemption Statement

Winterfields Farm
Golf Club Lane, Wiggonholt
Pulborough, West Sussex, RH20 2EN

Planning application DC/26/0471
De minimis exemption statement

Report Sign-Off Sheet

Project Title	Winterfields Farm
Report Type	Biodiversity Net Gain Exemption Statement
Location	Golf Club Lane, Wiggonholt, Pulborough, West Sussex, RH20 2EN
Planning Reference	DC/26/0471
Report Reference	WF140926-BNG
Version / Date	R.01 / 14 September 2026
Client	Winterfields Farm Ltd. (instruction via David Campion, Batcheller Monkhouse Ltd.)
Status	For submission to Horsham District Council

Report Author(s)

Initials	Qualifications	Role	Signature	Date
RO	BSc MSc MCIEEM CBiol MIFM	Author		14/09/2026

Declaration of Competence and Compliance

This report has been prepared by Leith Ecology Consulting Ltd. in accordance with the CIEEM Code of Professional Conduct and BS 42020:2013, with reasonable skill, care and diligence appropriate to a proportionate planning statement.

The assessment is based on the planning drawings, supplied photographs and historic aerial imagery identified in Section 2.1, together with field verification of the proposed development footprint and existing access. The site inspection date must be confirmed in Section 2.2 before formal issue.

This statement addresses whether the proposed development qualifies for the de minimis exemption from the statutory biodiversity gain condition under Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024. It is not a Preliminary Ecological Appraisal or a wider protected species assessment.

The conclusions apply to the development shown on the submitted plans. If the footprint, access works, service routes or other ground disturbance change, the BNG exemption position should be reviewed before works proceed.

Executive Summary

Leith Ecology Consulting Ltd. (Leith Ecology) was commissioned by David Campion of Batcheller Monkhouse Ltd., on behalf of Winterfields Farm Ltd., to provide a proportionate ecological statement to assist Horsham District Council (HDC) in determining whether mandatory Biodiversity Net Gain (BNG) applies to planning application DC/26/0471.

The application is for the stationing of a mobile home for a temporary period of five years to accommodate a rural worker. The proposed mobile home measures approximately 9.2 m by 6.0 m, giving an external plan footprint of approximately 55.2 m². That overall footprint does not itself determine whether the de minimis exemption applies: Regulation 4 concerns the area of habitat with a biodiversity value greater than zero that would be lost or degraded by the development.

The proposed mobile-home footprint is located within an existing farm/equestrian yard used for vehicle parking and manoeuvring. The surface comprises compacted road planings / permeable hardstanding with only sparse, discontinuous vegetation. This is appropriately classified for BNG purposes as Urban - Artificial unvegetated, unsealed surface. The statutory biodiversity metric assigns this habitat Very Low distinctiveness with a score of 0; it therefore has a biodiversity value of zero for the purposes of the de minimis test.

No onsite priority habitat would be impacted by the proposed mobile-home footprint. No hedgerow or watercourse is affected, and no new engineering works are shown along the existing access route. No discrete parcel of habitat with a biodiversity value greater than zero is identified within the proposed mobile-home footprint; in any event, the area of any such habitat affected is less than 25 m². The impact on onsite linear habitat is 0 m and therefore less than 5 m.

Conclusion

On the basis of the submitted plans, photographic and historic evidence and the field verification described in this report, the proposed development meets both conditions of the de minimis exemption in Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024. The statutory biodiversity gain condition therefore does not apply to DC/26/0471 and a statutory biodiversity metric calculation and Biodiversity Gain Plan are not required for the development as currently proposed.

Contents

Executive Summary	3
1. Introduction	5
1.1 Commission and purpose	5
1.2 Proposed development	5
1.3 Scope	5
2. Methodology and Evidence Reviewed	6
2.1 Desk review	6
2.2 Site inspection	6
2.3 Assessment approach.....	6
3. Existing Habitat and Development Impacts	7
3.1 Proposed mobile-home footprint	7
3.2 Habitat and impact summary	7
3.3 Existing access	7
4. Biodiversity Net Gain Exemption Assessment	8
4.1 Regulation 4 assessment.....	8
4.2 Habitat value of the road-planings surface	8
4.3 Application of the 6 August 2026 changes.....	8
4.4 Need for a statutory metric.....	8
5. Conclusion	9
6. References.....	10
Appendix A - Planning and Photographic Evidence	11
A1. Application location and development position.....	11
A2. Proposed mobile-home dimensions	13
A3. Historical site use.....	14
A4. Supplied site photographs	15

1. Introduction

1.1 Commission and purpose

Leith Ecology was commissioned to prepare a brief ecological statement addressing the BNG position for Winterfields Farm, Golf Club Lane, Wiggonholt, Pulborough, West Sussex, RH20 2EN. The statement has been prepared in response to a query raised by HDC in relation to planning application DC/26/0471.

The specific purpose of the commission is to determine whether the proposed development meets the de minimis exemption from mandatory BNG and to provide HDC with proportionate ecological evidence supporting that conclusion.

1.2 Proposed development

Planning application DC/26/0471 seeks permission for the stationing of a mobile home on the site for a temporary period of five years to accommodate a rural worker. The submitted Proposed Plan and Elevations (Folkes Architects drawing 25053/3.05) shows a mobile home approximately 9.2 m long by 6.0 m wide, with a stated gross internal area of 50.73 m² and an external plan footprint of approximately 55.2 m².

The proposed position is shown on Folkes Architects drawing 25053/3.03 adjacent to the existing equestrian/stable facilities. The application red line also follows the established access from Golf Club Lane to the development area.

1.3 Scope

This statement is limited to the statutory BNG exemption position. It considers the habitat directly affected by the mobile-home footprint and any associated impact arising from the existing access as shown on the submitted application plans.

The statement does not assert that every habitat within the application red line has a biodiversity value of zero. The legal test concerns habitat that is actually lost or degraded by the development. Habitats that are merely within the red line but are retained and unaffected do not count towards the de minimis impact threshold.

No separate utilities or service-trench layout has been provided. The conclusion therefore relates to the development as shown and assumes that any service connections or ancillary works are contained within the existing surfaced yard, or otherwise do not cumulatively result in the loss or degradation of 25 m² or more of habitat with biodiversity value greater than zero or 5 m or more of linear habitat.

2. Methodology and Evidence Reviewed

2.1 Desk review

The following information was reviewed as part of the assessment:

- Folkes Architects drawing 25053/3.01, Location Plan, September 2025;
- Folkes Architects drawing 25053/3.03, Site Plan, September 2025;
- Folkes Architects drawing 25053/3.05, Proposed Plan and Elevations, September 2025;
- supplied ground photographs showing the current surface and parking use of the proposed mobile-home area;
- supplied Google Earth historical imagery dated 13 September 2012, showing established yard/vehicle use in the vicinity of the proposed development;
- the Biodiversity Gain Requirements (Exemptions) Regulations 2024, in particular Regulation 4; and
- current Government BNG guidance and the statutory biodiversity metric habitat classifications.

2.2 Site inspection

A site inspection was undertaken by Ryan Oakley BSc MSc MCIEEM CBiol MIFM of Leith Ecology on **14/09/2026**. The proposed mobile-home footprint, immediately adjoining yard margins and the existing access were inspected to verify habitat type, vegetation cover and whether priority or linear habitat would be lost or degraded by the proposed development.

The inspection was targeted to the BNG exemption question and was not intended to constitute a full Preliminary Ecological Appraisal. Habitat identification was made at a level sufficient to determine the relevant statutory metric habitat category and whether the Regulation 4 thresholds would be exceeded.

2.3 Assessment approach

Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024 provides that the biodiversity gain planning condition does not apply where both of the following conditions are met:

- the development does not impact an onsite priority habitat; and
- the development impacts less than 25 m² of onsite habitat with a biodiversity value greater than zero and less than 5 m of onsite linear habitat.

For this purpose, habitat is impacted where it is lost or degraded such that its biodiversity value decreases. The assessment therefore focuses on the actual development impact rather than the total area enclosed by the planning application red line.

3. Existing Habitat and Development Impacts

3.1 Proposed mobile-home footprint

The proposed mobile-home area is an existing, trafficked yard/parking surface formed predominantly from compacted road planings and aggregate. The surface is unsealed and largely unvegetated. Sparse individual plants occur locally through or at the margins of the aggregate, but do not form a separate, continuous vegetated habitat parcel within the proposed footprint.

The appropriate statutory metric habitat classification is Urban - Artificial unvegetated, unsealed surface. This category includes permeable hardscape and other unvegetated/unsealed surfaces created or maintained through human activity. In the statutory biodiversity metric this habitat is Very Low distinctiveness with a distinctiveness score of 0 and a fixed condition score of 0. Its baseline biodiversity value is therefore zero.

The fact that the proposed mobile home has an external plan footprint of approximately 55.2 m² does not prevent use of the de minimis exemption because the 25 m² threshold applies only to impacted habitat with a biodiversity value greater than zero. The zero-value road-planings surface is not counted towards that 25 m² threshold.

3.2 Habitat and impact summary

Feature	Baseline / classification	Proposed impact	BNG relevance
Mobile-home footprint	Compacted road planings / permeable hardstanding; Urban - Artificial unvegetated, unsealed surface.	Stationing of mobile home over existing surfaced yard.	Very Low distinctiveness; metric score 0. Zero biodiversity value.
Sparse vegetation within planings	Isolated/discontinuous colonising vegetation within the trafficked aggregate surface; not a discrete habitat parcel.	Covered only where it falls within the mobile-home footprint.	Does not change the primary zero-value habitat classification. No separate >0-value habitat parcel identified within the footprint.
Existing access	Established access serving the farm/equestrian use and included within the application red line.	Continued use; no widening, resurfacing or vegetation clearance shown on submitted plans.	No additional habitat loss or degradation identified from the development as proposed.
Adjacent grassland / yard margins	Vegetated habitat occurs outside the mobile-home footprint.	Retained and not required for the stationing of the mobile home as shown.	No material impact identified. Any >0-value habitat affected remains below 25 m ² .
Hedgerows / watercourses	No hedgerow or watercourse lies within the mobile-home footprint or requires removal for the existing access.	No removal, culverting or other direct works shown.	0 m of onsite linear habitat impacted; below the 5 m threshold.
Priority habitat	No onsite priority habitat identified within the proposed mobile-home footprint or affected part of the access.	None.	First Regulation 4 condition satisfied.

3.3 Existing access

The submitted Location Plan shows a narrow red-line corridor following the existing access between Golf Club Lane and the farm/equestrian complex. This is an existing access route rather than a new access proposed as part of DC/26/0471. No widening, new surfacing, hedgerow removal, ditch works or other habitat-altering engineering works are shown along it.

Accordingly, the presence of the access within the application red line does not, in itself, represent a BNG habitat impact. If new access works or service trenches outside the existing surfaced route are subsequently proposed, those works should be checked against the cumulative de minimis thresholds before implementation.

4. Biodiversity Net Gain Exemption Assessment

4.1 Regulation 4 assessment

Table 2 applies the two statutory conditions in Regulation 4 directly to the proposed development.

Regulation 4 requirement	Evidence	Assessment	Outcome
No impact on onsite priority habitat.	The mobile-home footprint comprises existing road planings / artificial unvegetated, unsealed surface. No priority habitat is affected by the footprint or existing access as proposed.	No onsite priority habitat would be lost or degraded.	Satisfied
Impact <25 m² of onsite habitat with biodiversity value >0.	The approximately 55.2 m ² mobile-home footprint is predominantly zero-value artificial unvegetated, unsealed surface. No discrete >0-value habitat parcel is identified within the footprint; adjacent vegetated habitats are retained.	Area of >0-value habitat impacted is less than 25 m ² .	Satisfied
Impact <5 m of onsite linear habitat.	No hedgerow or watercourse removal or degradation is required for the mobile-home footprint or continued use of the existing access.	Linear habitat impact = 0 m.	Satisfied

4.2 Habitat value of the road-surface

The statutory biodiversity metric distinguishes between the physical size of a development and the biodiversity value of the habitat affected. Urban - Artificial unvegetated, unsealed surface is assigned Very Low distinctiveness with a score of 0. The current Small Sites Metric guidance also maps “Permeable Hardscape” to this habitat type and identifies it as Very Low distinctiveness.

Consequently, replacing or covering the existing road-planings surface with the proposed mobile home does not generate a loss of biodiversity units. The 55.2 m² footprint is therefore not 55.2 m² of habitat with biodiversity value greater than zero for the purposes of Regulation 4.

4.3 Application of the 6 August 2026 changes

Government guidance was amended from 6 August 2026 to introduce, among other changes, exemptions for developments on sites no larger than 0.2 hectares and for qualifying temporary developments permitted for five years or less. Those new exemptions apply only where the application for planning permission was made on or after 6 August 2026.

DC/26/0471 was already an extant planning application well before 6 August 2026, with the application subject to consultation in April 2026. The new 0.2 ha and temporary-development exemptions are therefore not relied upon in this statement. The assessment instead relies on the de minimis exemption in Regulation 4, which was already in force and is applicable to this application.

4.4 Need for a statutory metric

Government guidance requires sufficient evidence to justify a claimed de minimis exemption and encourages a completed metric where it cannot be clearly demonstrated whether habitat would be lost or degraded. In this case, the development footprint is readily identifiable on the submitted plans and the affected surface can be clearly classified from the site evidence as a zero-value statutory metric habitat. The evidence is therefore sufficient to determine the exemption without undertaking a full statutory metric calculation.

5. Conclusion

Leith Ecology concludes that planning application DC/26/0471 meets the de minimis exemption under Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

The proposed mobile-home footprint is approximately 55.2 m², but it is located on existing compacted road planings / permeable hardstanding appropriately classified as Urban - Artificial unvegetated, unsealed surface. This habitat has a biodiversity value of zero under the statutory biodiversity metric and therefore does not count towards the 25 m² threshold for habitat with biodiversity value greater than zero.

No onsite priority habitat would be impacted. No hedgerow or watercourse is affected, giving 0 m of linear habitat impact. No discrete parcel of >0-value habitat is identified within the proposed mobile-home footprint, and any incidental impact on such habitat would in any event be less than 25 m². Continued use of the existing access, in the absence of widening or other engineering works, does not constitute additional habitat loss or degradation.

Ecological opinion

The biodiversity gain planning condition does not apply to the development as currently proposed. A statutory biodiversity metric calculation and Biodiversity Gain Plan are not required. Horsham District Council can therefore determine DC/26/0471 on the basis that the development is exempt from mandatory BNG under the de minimis provisions of Regulation 4.

This conclusion should be revisited if the development footprint changes or if additional works are proposed outside the existing surfaced area, including new service trenches, access widening, vegetation clearance or works to hedgerows or watercourses.

6. References

Biodiversity Gain Requirements (Exemptions) Regulations 2024 (SI 2024/47), Regulation 4, as amended.

British Standards Institution (2013). BS 42020:2013 Biodiversity - Code of practice for planning and development.

Department for Environment, Food & Rural Affairs (2023, updated 2026). Biodiversity net gain: exempt developments. GOV.UK.

Department for Environment, Food & Rural Affairs / Ministry of Housing, Communities and Local Government (2024, updated 2026). Biodiversity net gain. Planning Practice Guidance, GOV.UK.

Department for Environment, Food & Rural Affairs (2023). Statutory Biodiversity Metric (including Small Sites Metric): statutory metric habitat classifications and scores.

Department for Environment, Food & Rural Affairs (2025). Small Sites Metric (Statutory Biodiversity Metric) User Guide, July 2025.

Folkes Architects (2025). Winterfields Farm, Location Plan, drawing 25053/3.01, September 2025.

Folkes Architects (2025). Winterfields Farm, Site Plan, drawing 25053/3.03, September 2025.

Folkes Architects (2025). Winterfields Farm, Proposed Plan and Elevations, drawing 25053/3.05, September 2025.

West Sussex County Council (2026). Weekly Planning Authority Consultations Report, including DC/26/0471, received 9 April 2026.

The figures below reproduce the key application and supporting evidence reviewed for this BNG exemption statement. They are included to allow the Local Planning Authority to relate the habitat assessment directly to the proposed development footprint and established site use.

[illegible]

Leith Ecology Consulting Ltd. | WF140926-BNG | R.01 | Page 11



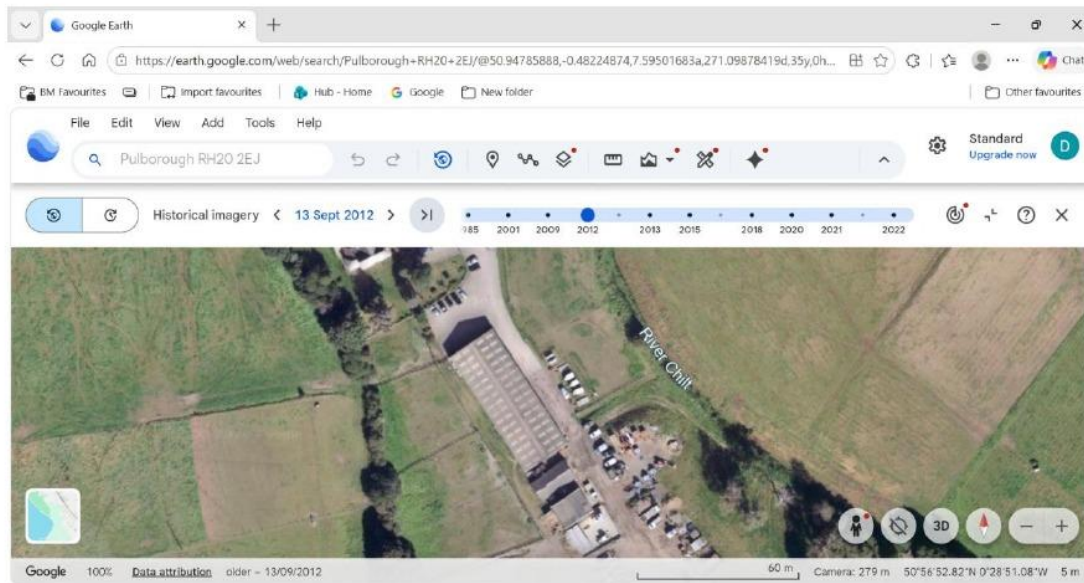
Figure A2. Development Site Plan - Folkes Architects drawing 25053/3.03 (September 2025).

A2. Proposed mobile-home dimensions



Figure A3. Proposed Plan and Elevations - Folkes Architects drawing 25053/3.05. The proposed unit is shown as approximately 9.2 m x 6.0 m.

A3. Historical site use



Google Earth: Historical View 2012

Figure A4. Supplied Google Earth historical view (13 September 2012), showing established yard/vehicle activity in the vicinity of the proposed development.

A4. Supplied site photographs



Photo A1. View across the proposed mobile-home area, showing the existing compacted road-planings / aggregate surface and current vehicle parking use.



Photo A2. Close view of the road-planings / permeable hardstanding surface, showing sparse and discontinuous vegetation within the trafficked aggregate.