

Commercial Land Road

Biodiversity Net Gain

September 2025



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Commercial Land Road

Biodiversity Net Gain

September 2025

Report Ref: DFA25062V2

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1 INTRODUCTION

1.1 Background

- 1.1.1 Derek Finnie Associates was commissioned by Legal & General (Strategic Land North Horsham) Ltd to provide ecological advice in relation to an area of land within their wider land holdings at North Horsham. There is currently an proposal to construct a new road through the Commercial land area of the development site.
- 1.1.2 The time limit for the submission of Reserved Matters on the Employment Land has passed. As such, the Applicant is applying for full planning permission for the Primary Road through the Employment Land. As this proposal will be covered by a new, stand alone detailed planning application, consideration needs to be given to the site's potential to fulfil its requirements under the Biodiversity Net Gain regulations.

1.2 Current Policy and Guidance

- 1.2.1 Within Section 98 of the Environment Act 2021, there is provision for achieving a 10% Biodiversity Net Gain (BNG) within a development, with the particulars being covered under Schedule 14 of the Act.
- 1.2.2 The following report, therefore, sets out the proposal for the Site and assesses the potential uplift in Biodiversity Units that could be realised from the scheme.

2 METHODOLOGY

2.1 Defra Metric

- 2.1.1 The Defra metric looks at the biodiversity value of a site prior to the proposed development by assigning values to each habitat type, the quality of the habitat and the extent of that habitat. This results in a combined value for the site presented in an arbitrary figure expressed as Biodiversity Units. A similar approach is also taken for linear features within a site, such as hedgerows and rivers. For rivers, a River Corridor Assessment (RCA) is undertaken using the MorPh5 methodology, which needs to be completed by a trained and certified surveyor.
- 2.1.2 A second calculation is then undertaken for the post development scenario, where professional judgement is used in determining the value of the habitats which will be created as a result of the proposed scheme. The difference in units pre and post development is then expressed as a percentage for habitats, hedgerows and rivers (where applicable).
- 2.1.3 If a significant increase in BNG value cannot be achieved within the Site, there is the potential to provide off site enhancements to complement on-site works.
- 2.1.4 The current assessment was undertaken using the Statutory Metric published in July 2024 (V1.0.4).
- 2.1.5 As the statutory framework for biodiversity net gain involves the discharge of the biodiversity gain condition following the grant of planning permission 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).

2.2 Site Assessment

- 2.2.1 A site assessment was made in June 2025 with the habitats present within the Site being assessed and assigned to a category within the *UKHabs V2* classification system. Where appropriate, the Condition of each habitat encountered was assessed using the condition scoring criteria as presented within the Metric.
- 2.2.2 All survey work was undertaken by Derek Finnie BSc DipCons MSc CEnv MEnvSc MCIEEM, Managing Director of Derek Finnie Associates who has over 30 years' experience as a practicing ecologist and is a certified RCA surveyor.

3 THE SITE

3.1 Current description

- 3.1.1 An 'extended' Phase 1 Habitat Survey was carried out in June 2025. The survey methodology followed that presented by the JNCC (2010). The Phase 1 technique aims to classify each habitat into categories based on the assemblage of plant species present, with the dominant plant species for each habitat being noted. In some cases, sub-divisions or modifications of the standard categories can be made where this is useful in providing further detail.
- 3.1.2 The Phase 1 survey provides sufficient information to allow the habitats present to be placed into a UKHabs V2 classification category, as used in the Defra Metric.
- 3.1.3 Additional information was also collected during the site survey to allow the condition of the habitats identified to be assessed based on pre-determined criteria.
- 3.1.4 The Site, which covers approximately 6.4ha, comprises several fields delineated by hedgerows. A small stream, Chennells Brook, runs along the western boundary
- 3.1.5 The majority of the fields themselves have been in active arable crop production until late in 2024; the western most fields have developed into a species poor, semi-improved grassland.
- 3.1.6 The following Phase 1 habitats were encountered within the Site:
- Modified grassland;
 - Arable, cereal crops;
 - Other woodland; broad-leaved;
 - Hedges; and
 - Other rivers (non-priority)
- 3.1.7 For reference, there are no irreplaceable habitats as defined by the Biodiversity Gain Requirements (Irreplaceable Habitats) Regulation 2024 within the Application boundary. And there is no evidence that any form of adverse, or destructive, management has taken place within the Site which would affect the condition of the habitats present.
- 3.1.8 In terms of the BNG Metric, a summary of the habitats is present in Table 1.

Table 1. Summary of on-site habitats

Habitat	Condition	Area/length
Modified grassland	Poor	1.229ha
Cereal crops	Condition Assessment N/A	5.16ha
Other woodland; broadleaved	Poor	0.013ha
Native hedgerow with trees - associated with bank or ditch	Moderate	0.34km
Native hedgerow with trees	Moderate	0.03km
Native hedgerow with trees	Moderate	0.06km

- 3.1.9 There is a proposed drainage outfall from an attenuation basin towards the west of the Site. Whilst the design of the headwall has not been finalised, it is expected to be less than 2m in width. Hence as there no suggestion that the river or surroundings bank vegetation would meet the criteria for a Habitat of Principle Importance, the river section has been omitted as it is believed the impact to the river would fall under Section 4(2) and (3)(b) of Biodiversity Gain Requirements (Exemptions) Regulations 2024:

(2) The first condition is that the development does not impact an onsite priority habitat.

(3) The second condition is that the development impacts—

(b) less than 5 metres in length of onsite linear habitat

3.2 Post development

- 3.2.1 Whilst the application is principally concerned with the road construction only, consideration has been given to creating high quality, species rich habitats within the Site wherever possible.
- 3.2.2 Within the landscape strategy for the Site, the creation of new, species rich habitats using native species wherever possible has been one of the principal drivers. These include:
- Over 800m² of new broad-leaved woodland;
 - Amenity grassland covering 3.356ha;
 - Species rich wet/marshy grassland within the 5590m² attenuation basin;
 - 210 new trees throughout the scheme; and
 - Re-enforcement planting to main retained hedgerow
- 3.2.3 The location and extent of the habitat creation and enhancement is depicted on the Landscape Strategy drawing submitted with this application.

4 RESULTS

4.1 Headline Results

4.1.1 The headline results from the Biodiversity Metric for presented in Table 2.

Table 2.Headline Results

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	1.32
	<i>Hedgerow units</i>	0.82
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	10.21%
	<i>Hedgerow units</i>	17.18%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

4.1.2 As can be seen from Table 2, a net increase in the biodiversity value of the Site is achieved for the habitat's component (10.21%), and the hedgerows (17.18%). The full Metric has been submitted as a separate Excel workbook.

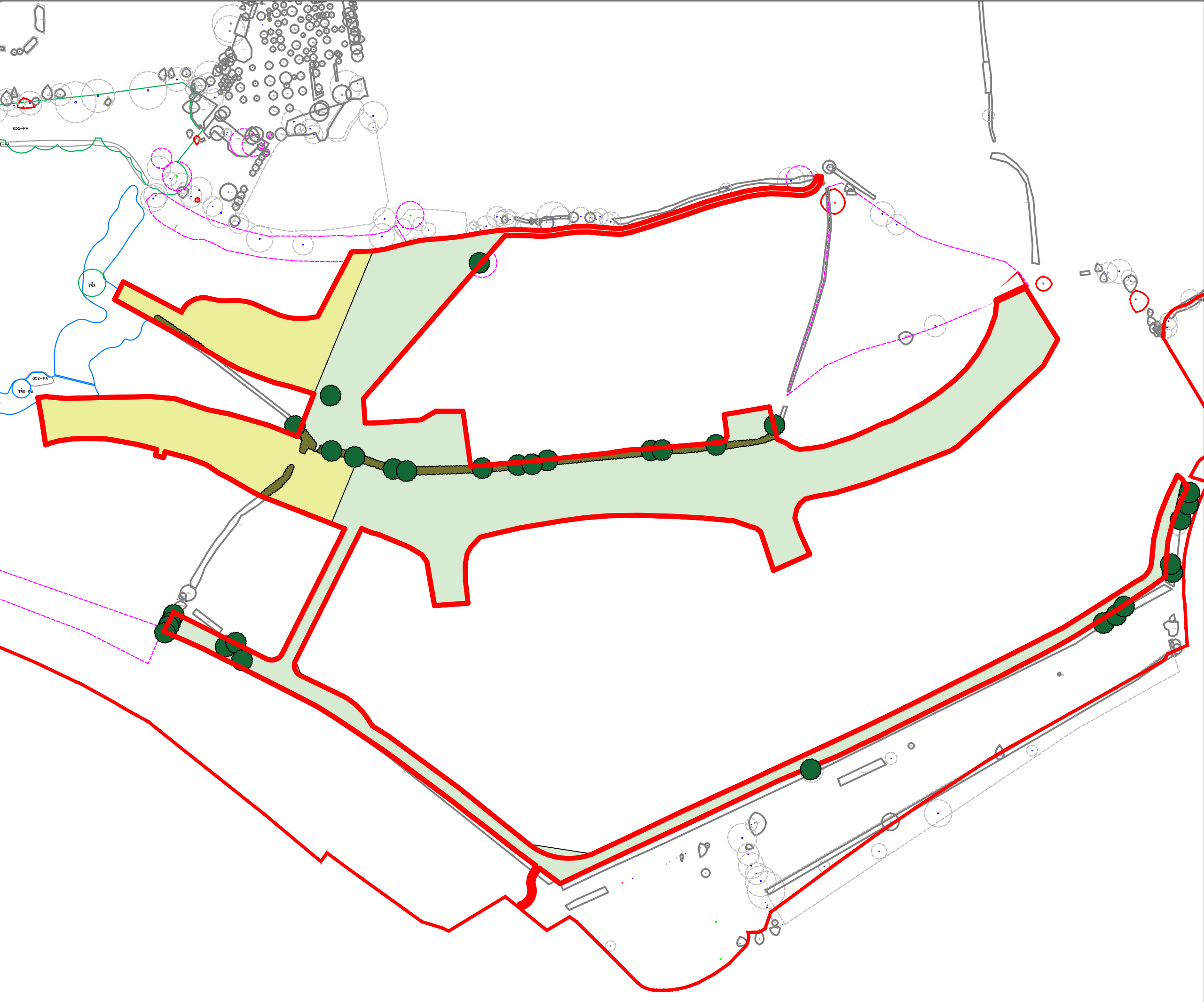
5 OUTLINE MANAGEMENT

5.1 Habitat Creation and Ongoing Management

- 5.1.1 The new habitats will be created during and immediately after the construction of the road. Retained habitat will be protected through the installation of the appropriate protective fencing as required.
- 5.1.2 The long term management of the Site has been addressed in the Landscape and Ecological Plan prepared by David Jarvis Associates and submitted with this application. It is envisaged that a Habitat Management and Monitoring Plan (HMMP) will be submitted as a Condition of the planning permission which will detail specific management prescriptions, monitoring programme and remedial activities to ensure the suggested BNG uplift is delivered.

6 SUMMARY

- 6.1.1 As can be seen from Table 2, the proposed development is predicted to result in a net biodiversity gain when the habitat creation and enhancement scheme is implemented. It is proposed that a Habitat Management and Monitoring Plan (HMMP) be prepared for the scheme to ensure the long-term management of the habitats is undertaken, with appropriate monitoring and remedial works as necessary.



- Legend
- Tree/woodland
 - Hedgerow
 - Arable
 - Semi-improved grassland

Drawing Number:
Figure 1

Title:
Phase 1 Map

Date:
September 2025

Project:
Commercial Land Road

Client:
L&G

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Appendix 1

Condition Sheets

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)			
UK Habitat Classification (UKHab) Habitat Type			
Grassland - Modified grassland			
On-site or off-site, site name and location	Commercial Land	Survey date and Surveyor name	D Finnie. June2025
Limitations (if applicable)		Survey reference (if relating to a wider survey)	
Grid reference		Habitat parcel reference	
Habitat Description			
Semi-improved grassland. Graminoid species include those commonly associated with agriculturally improved grassland such as perennial rye grass <i>Lolium perenne</i> , cock's-foot <i>Dactylis glomerata</i> , Yorkshire fog <i>Holcus lanatus</i>			
ukhab – UK Habitat Classification			
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	There are 6-8 vascular plant species per m ² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m ² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	No	Sward dominated by a few grass species
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No	Sward even tdue to mowingmowing
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	No	No scrub present
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.	Yes	
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	Yes	
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes	Minimal bracken present at periphery of some fields.
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Yes	None noted
Essential criterion achieved (Yes or No)			No
Number of criteria passed			Four
Condition Assessment Result (out of 7 criteria)	Condition Assessment Score	Score Achieved x/√	
Passes 6 or 7 criteria including passing essential criterion A	Good (3)		

Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)		
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)	X	
Suggested enhancement interventions to improve condition score			
Footnotes			
Footnote 1 – Creeping thistle <i>Cirsium arvense</i> , spear thistle <i>Cirsium vulgare</i> , curled dock <i>Rumex crispus</i> , broad-leaved dock <i>Rumex obtusifolius</i> , common nettle <i>Urtica dioica</i> , creeping buttercup <i>Ranunculus repens</i> , greater plantain <i>Plantago major</i> , white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i> . Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover. Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement. Footnote 4 – Wildlife and Countryside Act 1981 (as amended).			

Habitat Type														
Native hedgerow														
Native hedgerow - associated with bank or ditch														
Native hedgerow with trees														
Native hedgerow with trees - associated with bank or ditch														
Species-rich native hedgerow														
Species-rich native hedgerow - associated with bank or ditch														
Species-rich native hedgerow with trees														
Species-rich native hedgerow with trees - associated with bank or ditch														
Habitat Description														
ukhab – UK Habitat Classification														
On-site or off-site, site name and location	Commercial Land			Survey date and Surveyor name	June 25, D Finnie									
Limitations (if applicable)				Survey reference (if relating to a wider survey)										
Condition Assessment Details														
A series of ten attributes, representing key physical characteristics are used for this assessment. Each attribute is assigned to one of five functional groups (A – E) and the condition of a hedgerow is assessed according to the number of attributes from these functional groups which pass or fail the 'favourable condition' criteria.														
This assessment is based on the Hedgerow Survey Handbook ¹ and Favourable Conservation Status document ² . For further clarification please refer to the Hedgerow Survey Handbook.														
Best practice would be to record the species, age, spacing and other key information about all trees present along a hedgerow within the 'Habitat Description' box, as well as other key features of the hedgerow.														
Hedgerow favourable condition attributes														
Attributes and functional groupings (A, B, C, D and E)	Criteria - the minimum requirements for 'favourable condition'	Criteria description	Habitat parcel reference											
			H1	H3	H3									
			Grid reference											
Core groups - applicable to all hedgerow types				Criterion passed (Yes or No)										Notes (such as justification)
A1.	Height	>1.5 m average along length	The average height of woody growth estimated from base of stem to the top of the shoots, excluding any bank beneath the hedgerow, any gaps or isolated trees. Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice). A newly planted hedgerow does not pass this criterion (unless it is >1.5 m height).	Y	Y	Y								
A2.	Width	>1.5 m average along length	The average width of woody growth estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths (such as blackthorn <i>Prunus spinosa</i> suckers) are only included in the width estimate when they are >0.5 m in height. Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice).	Y	Y	Y								
B1.	Gap - hedge base	Gap between ground and base of canopy <0.5 m for >90% of length	This is the vertical 'gappiness' of the woody component of the hedgerow, and its distance from the ground to the lowest leafy growth. Certain exceptions to this criterion are acceptable (see page 65 of the Hedgerow Survey Handbook).	Y	Y	Y								

B2.	Gap - hedge canopy continuity	Gaps make up <10% of total length; and No canopy gaps >5 m	This is the horizontal 'gappiness' of the woody component of the hedgerow. Gaps are complete breaks in the woody canopy (no matter how small). Access points and gates contribute to the overall 'gappiness' but are not subject to the >5 m criterion (as this is the typical size of a gate).	Y	Y	N											
C1.	Undisturbed ground and perennial vegetation	>1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: · Measured from outer edge of hedgerow; and · Is present on one side of the hedgerow (at least).	This is the level of disturbance (excluding wildlife disturbance) at the base of the hedgerow. Undisturbed ground is present for at least 90% of the hedgerow length, greater than 1 m in width and must be present along at least one side of the hedgerow. This criterion recognises the value of the hedgerow base as a boundary habitat with the capacity to support a wide range of species. Cultivation, heavily trodden footpaths, poached ground etc. can limit available habitat niches.	Y	Y	Y											
C2.	Nutrient-enriched perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground.	The indicator species used are nettles <i>Urtica</i> spp., cleavers <i>Galium aparine</i> and docks <i>Rumex</i> spp. Their presence, either singly or together, does not exceed the 20% cover threshold.	N	N	N											
D1.	Invasive and neophyte species	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA ³) and recently introduced species.	Recently introduced species refer to plants that have naturalised in the UK since AD 1500 (neophytes). Archaeophytes count as natives. For information on archaeophytes and neophytes see the JNCC website ⁴ , as well as the BSBI website ⁵ where the 'Online Atlas of the British and Irish Flora' ⁶ contains an up-to-date list of the status of species. For information on invasive non-native species see the GB Non-Native Secretariat website ⁷ .	Y	Y	Y											
D2.	Current damage	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities.	This criterion addresses damaging activities that may have led to or lead to deterioration in other attributes. This could include evidence of pollution, piles of manure or rubble, or inappropriate management practices (for example, excessive hedgerow cutting).	N	N	N											
Additional group - applicable to hedgerows with trees only																	
E1.	Tree class	There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and or ancient ⁸), and there is on average at least one mature, ancient or veteran tree present per 20 - 50m of hedgerow.	This criterion addresses if there are a range of age-classes or morphologies which allow for replacement of trees and provide opportunities for different species.	N	N	N											
E2.	Tree health	At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	This criterion identifies if the trees are subject to damage which compromises the survival and health of the individual specimens.	Y	Y	Y											

The hedgerow condition assessment generates a weighting (score) ranging from 1 - 3, which is used within the Statutory Biodiversity Metric. The scores for each are set out in the tables below.

Condition categories for hedgerows without trees

Category	Category Requirements	Metric Score
Good	No more than 2 failures in total; AND No more than 1 failure in any functional group.	3
Moderate	No more than 4 failures in total; AND <u>Does not fail both attributes</u> in more than one functional group (for example, fails attributes A1, A2, B1 and C2 = Moderate condition).	2

Poor	Fails a total of more than 4 attributes; OR Fails both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).	1
Score achieved:		
Condition categories for hedgerows with trees		
Category	Category Requirements	Metric score
Good	No more than 2 failures in total; AND No more than 1 failure in any functional group.	3
Moderate	No more than 5 failures in total; AND Does not fail both attributes in more than one functional group (for example, fails attributes A1, A2, B1, C2 and E1 = Moderate condition).	2
Poor	Fails a total of more than 5 attributes; OR Fails both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).	1
Score achieved:		2
Suggested enhancement interventions to improve condition score		

Condition Sheet: WOODLAND Habitat Type						
UK Habitat Classification (UKHab) Habitat Types						
Woodland and forest - Lowland beech and yew woodland Woodland and forest - Lowland mixed deciduous woodland Woodland and forest - Native pine woodlands Woodland and forest - Other coniferous woodland Woodland and forest - Other Scot's pine woodland Woodland and forest - Other woodland; broadleaved Woodland and forest - Other woodland; mixed Woodland and forest - Upland birchwoods Woodland and forest - Upland mixed ashwoods Woodland and forest - Upland oakwood Woodland and forest - Wet woodland						
Habitat Description						
ukhab – UK Habitat Classification This condition sheet is based on the England Woodland Biodiversity Group (EWBG) Woodland Condition Survey Method, available here: Woodland Wildlife Toolkit (sylva.org.uk) IMPORTANT: This biodiversity metric woodland condition assessment must be used to assess woodland being input into the biodiversity metric. The outputs of this condition assessment are not equivalent to, nor are they comparable with the scores from the EWBG condition assessment, because the EWBG assessment has been adapted for the biodiversity metric, including the removal of EWBG Indicator 7 (Proportion of favourable land cover around woodland) and Indicator 14 (Size of woodland), and minor changes to other indicators.						
On-site or off-site, site name and location		Commercial land	Survey date and Surveyor name		D Finnie , June 25	
Limitations (if applicable)			Survey reference (if relating to a wider survey)			
Grid reference			Habitat parcel reference			
Condition Assessment Criteria						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Notes (such as justification)
A	Age distribution of trees	Three age-classes ¹ present.	Two age-classes ¹ present.	One age-class ¹ present.	1	
B	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland ² .	Evidence of significant browsing pressure is present in less than 40% of whole woodland ² .	Evidence of significant browsing pressure is present in 40% or more of whole woodland ² .	2	
C	Invasive plant species	No invasive species ³ present in woodland.	Rhododendron <i>Rhododendron ponticum</i> or cherry laurel <i>Prunus laurocerasus</i> not present, and other invasive species ³ <10% cover.	Rhododendron or cherry laurel present, or other invasive species ³ ≥10% cover.	2	
D	Number of native tree species	Five or more native tree or shrub species ⁴ found across woodland parcel.	Three to four native tree or shrub species ⁴ found across woodland parcel.	Two or less native tree or shrub species ⁴ across woodland parcel.	2	
E	Cover of native tree and shrub species	>80% of canopy trees and >80% of understory shrubs are native ⁵ .	50 - 80% of canopy trees and 50 - 80% of understory shrubs are native ⁵ .	<50% of canopy trees and <50% of understory shrubs are native ⁵ .	2	

