

J005516 - Plot 4, Bramblefield, Crays Lane, Thakeham, West Sussex
Supplementary BNG Note

1. The scheme as proposed could achieve BNG on-site, subject to implementation and management via HMMP of my recommendations – See Post-Development Habitat Map (Recommended).
2. The application site comprises a 2025sqm rectangular parcel of land which has been subject to open storage activities for over a decade based on aerial imagery. On the basis of an absence of enforcement notice served, it does appear that this use may be lawful in planning terms. However, in the absence of a Lawful Development Certificate, the BNG assessment has been based on on-site observations.
3. The site as it stands presently comprises a variety of habitat, subject to human intervention. Therefore, it has been classified as “Vacant or Derelict Land” due to the presence of redundant timber structures, including sheds, field shelters, and the siting of Storage Containers and similar paraphernalia. Some hardstanding is present, but this material has degraded and fractured, allowing vegetation growth through. Where hardstanding remains in situ it was noted that bare earth (soaked – i.e. mud) had been displaced in areas. As such, those areas are recorded as “unsealed surface”. On this assessment, the baseline habitat units present on the land have been identified as **0.6746 units**.
4. The site as it stands also accommodates some linear habitat within the footprint of the developed area. This comprises a band of native hedgerow with trees (along the boundaries of the site) – n.b. those “trees” included have been noted to be Leylandii (i.e. non-native), but it has also been recorded that a band of native hedging with varying trees (small and juvenile specimens, largely in poor condition) are present within the immediate frontage of this planting. On this assessment, the baseline habitat units present on the land have been identified as **1.554 units**. Noting the Post-Development scenario does not presently propose any hedgerow and would result in the loss of 5m to provide a secondary access, the development would result in a **0.138 unit** loss of linear habitat.
5. As proposed, namely the scheme advanced on Drawing no. J005516-DD-13, the scheme cannot achieve the mandatory 10% Net Gain for either area or linear habitat, and would require off-site credits be provided. This scheme results in a total of 0.1978 area units and 1.416 linear units being provided under the Post-Development scenario. This outcome requires **Scheme Alterations or Offsite Units**.
6. In accordance with the hierarchy, On-site net gains should be prioritised over off-site credits, where possible. Accordingly, I have undertaken a study and determined that, with my recommendations incorporated into the scheme, an overall 10% net gain can be achieved by the development against the assessed baseline condition of the site.

7. In order to achieve this, the scheme must be amended (either pre-submission, or by way of Condition), to provide:

- a. A segregated area of 50sqm per pitch (segregated by way of post & rail fencing to prevent grazing, and human interference) to be seeded with Emorsgate EG22. This area would then be capable of classification as “Modified Grassland” or, were a more diverse meadow mix selected, “Other Neutral Grassland”. The creation of a total area of 100sqm of grassland habitat, allowed to reach “moderate” condition, shall produce a total of **0.0347 area units**.
- b. Within the segregated grassland areas a total of 10 medium trees (5 per Pitch) should be planted. These trees are specimens that shall achieve a moderate to good condition and a diameter at breast height (DBH) of 30-90cm within 30 years. Suitable options comprise Wild Cherry (*Prunus avium*), Rowan (*Sorbus aucuparia*), and Field Maple (*Acer Campestre*).
- c. Within the wider site, to accommodate the juvenile trees removed to facilitate the development, a minimum of 8 small trees (4 per Pitch) should be planted. These trees are specimens that shall achieve a moderate to good condition and a diameter at breast height (DBH) of less than 30cm within 30 years. Higher calibre specimens will increase and improve net gains capable of being achieved. Alternatively, if capable of being uprooted without damage, existing trees on site can be replanted in desired locations. This would further improve the net gains achievable, but would be an activity that should be undertaken with arboricultural supervision.
- d. Within the site, and along the proposed boundary between the pitches, if desirable, the developer should seek to provide soft landscaping along the boundary as opposed to hard landscaping (Close Boarded Fencing). Should a species rich native hedgerow be provided along the extent of the separation, an overall 0.5356 linear units can be generated. I would propose that an appropriate species mix would comprise the following:

i. Hawthorn	(<i>Crataegus monogyna</i>)	(50%)
ii. Blackthorn	(<i>Prunus spinosa</i>)	(20%)
iii. Hazel	(<i>Corylus avellana</i>)	(20%)
iv. Holly	(<i>Ilex aquifolium</i>)	(10%)
v. Dog Rose	(<i>Rosa canina</i>)	(5%)

vi. Field Maple **or** Hornbeam

Planted at 4-5m intervals

N.B. If equestrian grazing of any land is proposed, species may require reconsideration to ensure all specimens are equestrian friendly.

Were the above recommendations incorporated into the scheme, subject to viability and provision of appropriate maintenance and management, the development can achieve a 0.0736 (10.91%) net gain in area habitat, and a 0.3976 (25.58%) net gain in linear habitat. This outcome for the post-development scenario would satisfy the mandatory requirement to achieve 10% net gain, and would preclude reliance upon off-site credits. The trading rules would also be satisfied, and therefore the Biodiversity Gain Plan would be capable of being secured through discharge of the statutory condition.

8. It is noted that applicant is Gypsy/Traveller, and scheme seeks to provide for such accommodation. As such, the “Developer” is likely to maintain habitat on-site themselves. As such, condition of habitat unlikely to exceed “Moderate”.
9. I therefore recommend that the prepared documentation is provided to the client for further consideration/discussion. Should my recommendations not be incorporated, justification shall need to be provided to the LPA as to why on-site mitigation and compensation has not been pursued.
10. Should the client be satisfied with my recommendations, it is suggested that they be incorporated, in a similar format to the “Post-Development Habitat Map (As Recommended)” prior to submission to the LPA, or any pending application is amended if it has already been submitted.

Signed: Peter Brownjohn *BSc AssocRTPI*

Dated: 17 March 2026