



Biodiversity Net Gain Statement

Holbrook Surgery, Holbrook, Horsham, West Sussex

Reference	HS150726-BNG
Version	R.02
Date	07/08/2026
Prepared for	Holbrook Surgery c/o Proctor Watts Cole Rutter

Prepared to support Horsham District Council planning validation requirements.

1 Purpose and validation context

This Biodiversity Net Gain (BNG) Statement has been prepared to accompany the Preliminary Ecological Appraisal and BNG report for Holbrook Surgery and to address the additional local validation information requested by Horsham District Council (HDC). It should be read alongside the updated ecology report, the completed Statutory Biodiversity Metric and the supporting habitat condition assessment.

The application site extends to 0.0286 ha (approximately 0.029 ha). The planning application was submitted before 6 August 2026. Although national guidance now exempts new planning applications for developments of 0.2 ha or below (unless on-site Priority Habitat is negatively impacted), Defra confirmed that applications already submitted continue to be subject to the BNG legislation applying at submission. Mandatory BNG therefore continues to apply to this application.

Validation information provided

HDC requirement	Submission response
Habitat report and maps	Updated PEA and BNG Report HS150726 R.02, including UKHab baseline map and site photographs.
Habitat condition assessment / competency	Modified grassland condition assessment is included in Appendix 5 of the ecology report and supplied separately. Ecologist competency is stated in the report sign-off and Section 8 of this Statement.
Statutory Biodiversity Metric	Original macro-enabled Excel workbook and a PDF representation for public accessibility are supplied.
BNG Statement	This document.
Draft HMMP, where appropriate	A 30-year HMMP is not considered applicable because the on-site gains do not meet HDC's published definition of significant on-site BNG. Proportionate establishment and management measures are provided in Section 7.

2 Biodiversity baseline

The site comprises modified grassland, developed land; sealed surface and non-native and ornamental hedgerow. No Priority Habitat, irreplaceable habitat or watercourse occurs within the application boundary. The baseline was surveyed on 17 June 2026 and assessed using UKHab v2.01 and the full Statutory Biodiversity Metric.

Metric module	Baseline extent	Baseline units
Area habitats	0.0286 ha	0.0518
Hedgerows	0.0599 km (59.9 m)	0.0599
Watercourses	None	0.0000

3 Mitigation hierarchy

Avoidance and minimisation

- The development footprint is confined to the existing landscaped grounds immediately adjoining the surgery.
- Vegetation removal and ground disturbance are limited to the defined application footprint and adjacent retained vegetation will be protected during construction.
- Vegetation clearance will avoid the main bird nesting season where practicable, with ecological checks where required.
- External lighting will be directed away from new native hedgerow, mixed scrub and adjacent vegetation, using warm-colour light sources where practicable.

Compensation and enhancement

Losses of modified grassland and non-native ornamental hedgerow are addressed through creation of mixed scrub, replacement modified grassland and native hedgerow within the application boundary. These measures satisfy the Statutory Biodiversity Metric trading rules and provide more than the required 10% gain in the applicable modules.

4 Post-development biodiversity value

Habitat / module	Post-development extent	Target condition	Post-development units
Mixed scrub	0.0072 ha	Moderate	0.0482
Modified grassland	0.0034 ha	Moderate	0.0118
Developed land; sealed surface	0.0180 ha	N/A	0.0000
Area habitat total	0.0286 ha	-	0.0600
Native hedgerow	0.0200 km (20 m)	Moderate	0.0669

Metric module	Baseline units	Post-development units	Net change	Net gain
Area habitats	0.0518	0.0600	+0.0082	+15.8%
Hedgerows	0.0599	0.0669	+0.0070	+11.8%

The 10% BNG requirement is achieved independently for area habitats and hedgerows and the metric trading rules are satisfied. No off-site biodiversity units or statutory biodiversity credits are required. No watercourse module applies.

5 On-site delivery and plans

Only habitats within the application red line boundary are relied upon to deliver the calculated BNG. Landscaping shown outside the red line is supplementary and is excluded from the metric. The proposed site/roof plan identifies the principal area of replacement native species hedging/scrub associated with the extension. The quantified habitat areas and lengths used in the metric are those stated in Section 4 above.

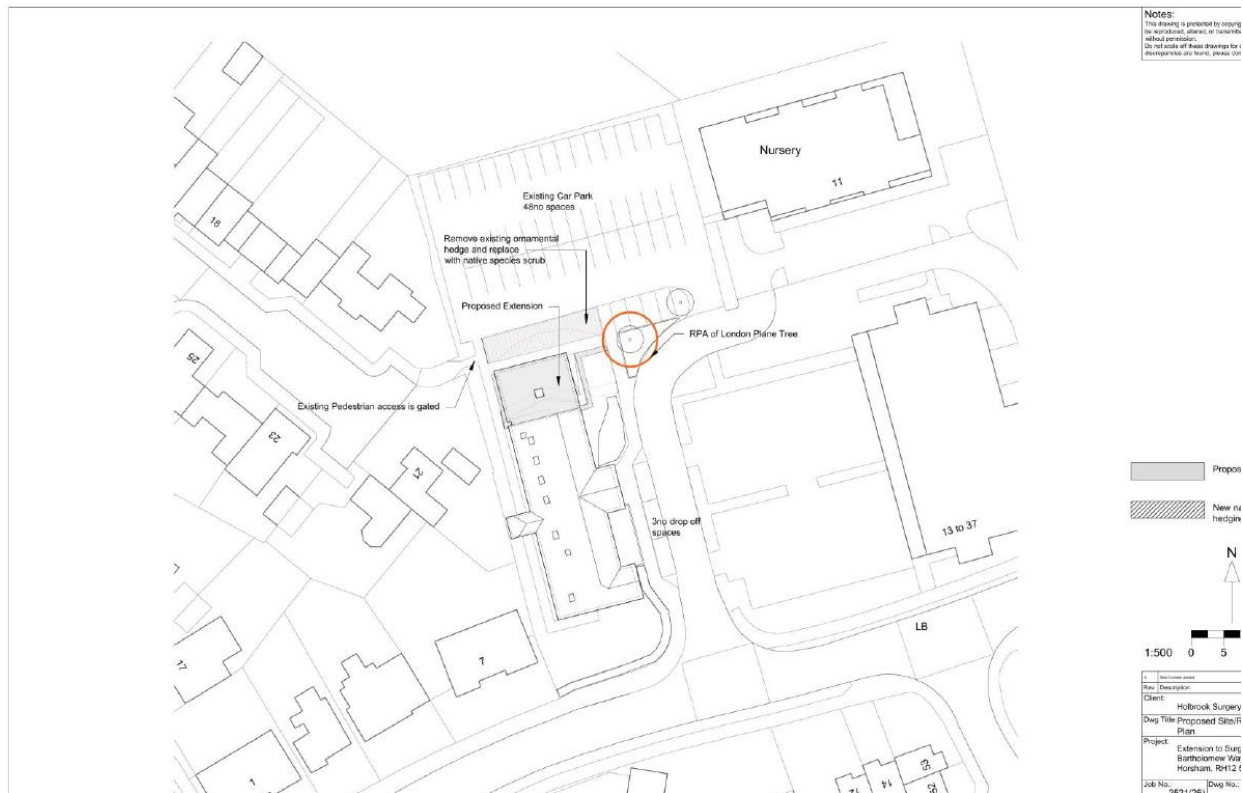


Figure 1. Proposed site/roof plan showing the extension and new native species hedging/scrub. Only habitat within the application red line is included in the metric.

6 Significant on-site BNG and HMMP requirement

HDC defines significant on-site BNG as: (1) an overall net change of 0.5 biodiversity units or more; and/or (2) gains involving habitats of high or very high distinctiveness; and/or (3) for major development, gains involving habitats of medium distinctiveness. HDC states that this definition is applied as a guide and retains discretion based on the circumstances of each case.

Holbrook Surgery is a minor development. The net changes are +0.0082 area habitat units and +0.0070 hedgerow units, both substantially below 0.5 units. No high or very high distinctiveness habitat gain is proposed. Although mixed scrub is of medium distinctiveness, the HDC medium-distinctiveness criterion applies to major development. The on-site gain is therefore not considered significant under HDC's published criteria.

Accordingly, a 30-year Habitat Management and Monitoring Plan is not considered proportionate or applicable to this scheme. This does not remove the need to implement and establish the habitat creation measures used in the Statutory Biodiversity Metric. Those measures should be secured through the approved landscape proposals and the Biodiversity Gain Plan.

7 Proportionate habitat establishment and management schedule

Habitat	Metric target	Establishment / management measures	Proportionate check
Mixed scrub - 0.0072 ha	Moderate; metric time to target 5 years	Establish a predominantly native scrub mix suited to the site; protect from damage; water during establishment where required; control competing weeds; replace failed plants; manage selectively to develop a varied, dense scrub structure rather than regular formal clipping.	Check establishment annually during the first 5 years and replace failures / adjust management where target condition is not developing.
Modified grassland - 0.0034 ha	Moderate; metric time to target 4 years	Reinstate a diverse amenity grassland sward; avoid routine fertiliser and herbicide use; manage cutting to permit flowering and structural variation where compatible with surgery use; repair bare or damaged areas.	Check during establishment and by year 4 that the sward is developing towards the Moderate condition entered in the metric.
Native hedgerow - 20 m	Moderate; metric time to target 5 years	Plant native woody species; protect and water during establishment; replace failures; maintain a dense continuous hedge; undertake routine cutting outside the main bird nesting season and avoid excessive annual close clipping.	Check establishment annually during the first 5 years and infill gaps or replace failures as necessary.

These measures are intended as proportionate establishment requirements for non-significant on-site BNG and are not presented as a 30-year HMMP. Any material change to the habitat types, areas, lengths or target conditions should trigger an update to the Statutory Biodiversity Metric and Biodiversity Gain Plan.

8 Ecologist competency

The habitat survey, condition assessment and Statutory Biodiversity Metric were prepared by a suitably experienced ecologist. The report sign-off records the author as RJ, BSc MSc MCIEEM CBiol MIFM, with technical review by DM, MSc MCIEEM. The work has been prepared in accordance with the CIEEM Code of Professional Conduct and BS 42020:2013.

9 Conclusion

The completed Statutory Biodiversity Metric demonstrates 15.8% net gain for area habitats and 11.8% net gain for hedgerows, with the trading rules satisfied and no off-site units required. The application remains subject to mandatory BNG because it was submitted before 6 August 2026. The proposed on-site gains do not meet HDC's published criteria for significant on-site BNG; a 30-year HMMP is therefore not considered applicable. Habitat creation and establishment should be secured through the approved landscape proposals and Biodiversity Gain Plan.

References

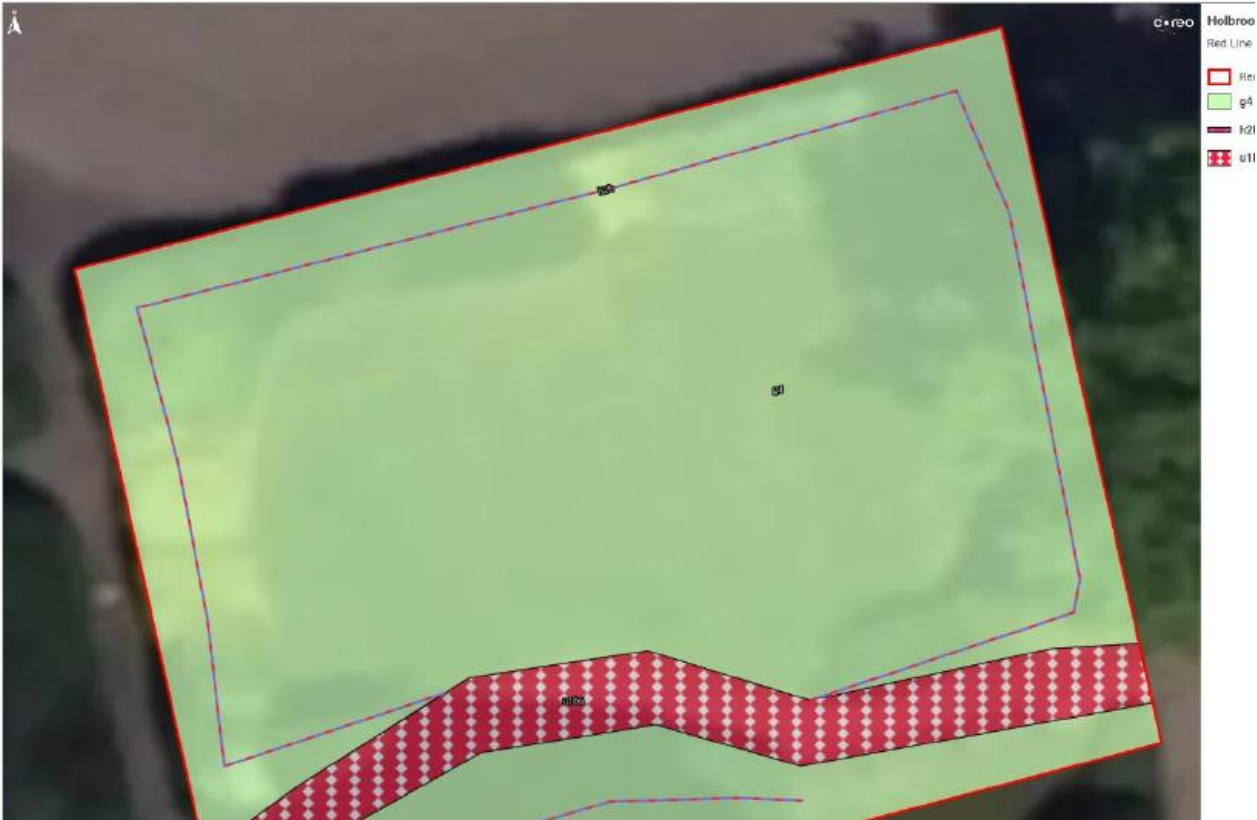
Defra (2026) Biodiversity Net Gain: Amendments and transitional arrangements published, 14 July 2026.
<https://defraenvironment.blog.gov.uk/2026/07/14/biodiversity-net-gain-amendments-and-transitional-arrangements-published/>

GOV.UK (2026) Biodiversity net gain: exempt developments. <https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>

Horsham District Council (2026) Biodiversity Net Gain. <https://www.horsham.gov.uk/planning/planning-applications/biodiversity-net-gain>

CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition.

Appendix A - Baseline habitat map



The application red line extends to approximately 0.029 ha and contains modified grassland, non-native and ornamental hedgerow and developed land; sealed surface.