

Mowbray ~ Commercial Land

*Biodiversity Net Gain ~
Design Report*

16 JULY 2026



Commissioned by

Legal & General (Strategic Land North Horsham) Ltd,
1 Coleman Street
London
EC2R 5AA
United Kingdom

Mowbray ~ Commercial Land

Biodiversity Net Gain ~ Design Report

16 JULY 2026

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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 a proposal to construct a new Commercial area within the wider 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 outline planning permission for the Employment Land. As this proposal will be covered by a new, stand alone 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, approximately 20m from the red line,
- 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;
 - Scrub; and
 - Hedges;
- 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. Pre-development Habitats

Habitat	Condition	Area/length
Modified grassland	Poor	4.204ha
Cereal crops	Condition Assessment N/A	12.831ha

Habitat	Condition	Area/length
Scrub: bramble	Condition Assessment N/A	0.1763ha
Native hedgerow with trees	Moderate	0.115km
Native hedgerow with trees	Moderate	0.1km

3.2. Post Development

3.2.1. The application is principally concerned with construction of commercial units, with individual units being brought forward by separate developers. Hence, it is not known at the present time, what, if any, habitats will be created within each land parcel. As such, it has been assumed, for the purposes of the post development BNG assessment, that these would all be sealed surface of some description. New habitats are restricted to the areas identified on the submitted parameter plan as 'Green Infrastructure'. Within the areas, the following will be created:

Table 2. Post development Habitats

Habitat	Condition	Area/length
Other woodland; broadleaved	Moderate	0.6ha
Other neutral grassland	Moderate	0.2ha
Other neutral grassland	Moderate	0.06ha
Other woodland; broadleaved	Moderate	1.88ha
Developed land; sealed surface	N/A - Other	14.47ha

4. Results

4.1. Headline Results

4.1.1. The headline results from the Biodiversity Metric for presented in Table 3.

Table 3 Headline Results

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	-21.80
	<i>Hedgerow units</i>	-1.72
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	-61.99%
	<i>Hedgerow units</i>	-100.00%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

4.1.2. As can be seen from Table 3, a positive increase in the BNG value of the Site is not possible. Therefore, to comply with the mandatory requirement to provide a minimum of 10% uplift in BNG, it proposed that the required biodiversity units will be provided elsewhere within L&G's wider landholdings at Mowbray or the appropriate credits will be purchased from a third party.

5. Summary

- 5.1.1. As can be seen from Table 2, the proposed development can not provide an onsite increase in the BNG value. Therefore offsite options or the purchase of credits will be pursued to ensure compliance with the legislation.

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).			

[illegible]

Additional group - applicable to hedgerows with trees only
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[illegible]

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			Score achieved						
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			Score achieved						
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:									
Suggested enhancement interventions to improve condition score									



Derek Finnie Associates offers over 30 years of professional ecological expertise to a wide range of clients, principally within the development arena, but also offering advice to the public and voluntary sectors. Based in Wokingham within the Thames Valley, we are ideally located to provide services to developers within the south and south-east of England.

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