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Updated Biodiversity Impact Calculation

Site Name

Land south of Old Crawley Road,
Faygate

Client

Fairfax Acquisitions
Ltd

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Author

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Document Control

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Original	Libby Morris BSc (Hons)	Kate Priestman MCIEEM, CEnv	12/4/24	N/A	
1.2	Sam Lunn MSc	Emma Baker BSc (Hons), MSc, MCIEEM	20/03/26	Updated site visit and amended proposed plans	

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About the Author

This report has been prepared by Libby Morris, a Consultant Ecologist at The Ecology Co-op. She is an experienced bird surveyor, is a FISC accredited botanist and is experienced in habitat surveys including NVC communities. She is competent in undertaking condition assessment and Biodiversity Impact Calculations as part of Statutory Biodiversity Net Gain as well as Preliminary Ecological Appraisals.

This report has been updated by Sam Lunn, a principal ecologist with over 13 years of experience. As a Full member of the chartered Institute of Ecology and Environmental Management (CIEEM), he is bound by CIEEM's code of professional conduct.

About the Reviewer

This report has been reviewed by Kate Priestman, who is a Principal Ecologist with over twenty years' experience. Kate has undertaken survey work and reporting, and prepared European Protected Species licences for numerous schemes. As a Full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and a Chartered Environmentalist (CEnv), she is bound by CIEEM's code of professional conduct.

The updated report has been reviewed by Emma Baker, who is a Senior ecologist with nine years' experience. She holds Level 1 great crested newt and hazel dormice survey licences. As a Full member of the Chartered Institute for Ecology and Environmental Management (CIEEM), she is bound by their code of professional conduct.



Report Summary

Purpose	The Ecology Co-operation was commissioned by Fairfax Acquisitions Ltd to undertake a Biodiversity Impact Calculation of a proposal to build 120 units with associated soft and hard landscaping on land south of Old Crawley Road, Faygate, using the Statutory Biodiversity Metric to quantify a net change in biodiversity.
Summary of Losses and Gains	The proposed development scheme at this site will result in the loss of: On-site • 4.749 hectares of arable land; • 0.051 hectares of modified grassland in moderate condition; • 0.095 hectares of bracken, and • 0.01km of species-rich hedgerow in poor condition. The proposed development scheme at this site will retain: On-site • 0.234km of line of trees associated with ditch in moderate condition, and • 0.124km of species-rich native hedgerow in moderate condition. The proposed development scheme at this site will enhance: On-site • 0.16km of species-rich native hedgerow in poor condition to moderate condition. Post-intervention the following habitats will be created: On-site • 0.616ha of developed land; sealed surface; • 0.668ha of developed land; sealed surface (buildings); • 0.613ha of other woodland; broadleaved in moderate condition; • 1.363ha of vegetated garden; • 0.412ha of developed land; sealed surface (Leaps); • 0.419ha of modified grassland in poor condition; • 0.334ha of other neutral grassland in moderate condition; • 0.195ha of other neutral grassland in moderate condition (SuDS) • 0.275ha of native mixed scrub in moderate condition; • 121 small trees (0.4927ha) in poor condition, and • 0.597km of native hedgerow in poor condition.
Final Metric Results	The Statutory Biodiversity Metric calculation has demonstrated that the proposed scheme will results in a likely net gain of 4.33 habitat units (+43.77%). The linear feature calculation for the proposed scheme results in a likely net gain



	of 1.96 hedgerow units (+65.45%) . The current scheme satisfies the trading rules within the Statutory Biodiversity Metric.
Does the scheme meet net gain requirements?	The current scheme exceeds the mandatory 10% net gain set out in the Environment Act 2021 and the 12% net gain requirement set out by Horsham District Council.



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1 INTRODUCTION

1.1 Purpose of the Report

There has been a mandatory requirement for all new developments to demonstrate 'net gains' in biodiversity from the 12th February 2024, following the release of updated National Planning Policy Framework¹ by the Department of Housing, Communities and Local Government and the Environment Act 2021². A mandatory value of 10% net gain in biodiversity value for all developments (that do not meet exemption criteria) is required under the Environment Act 2021.

This document includes a baseline 'Biodiversity Impact Calculation' (BIC) for the proposed development at land south of Old Crawley Road, Faygate. The calculation utilises the Statutory Biodiversity Metric and assigns 'biodiversity units' to the pre-existing habitats contained within a proposed development site and those that are predicted to be lost, restored and/or created once the development has been constructed. This allows an objective comparison to be made between the existing biodiversity value of a given site and the predicted biodiversity value post-development, with the net change in biodiversity value subsequently quantified.

The purpose of this document is to present the findings of the BIC based on the most up-to date existing habitat survey information and the most current outline plans for the proposed development of the site. Biodiversity Impact Calculations provide an evidence base for discussions between the ecological consultant, developer and the local planning authority regarding on-site avoidance, on-site mitigation and off-site compensation requirements.

This report will be used in relation to a proposal for 120 units with both hard and soft landscaping within the smaller cultivated field, south of Old Crawley Road. Given the likelihood of proposed changes in the design scheme, some of the recommendations will potentially be subject to change. The results of the BIC are deemed accurate for the most recent layout plan.

This report was commissioned and produced at the request of Fairfax Acquisitions Ltd.

1.2 Background

The site measures approximately 4.9ha and is set within a semi-rural location on the fringe of Horsham. It currently comprises a cultivated arable field with a small area of bracken in the south-west corner, surrounded by hedgerows. A deciduous woodland parcel lies adjacent to the eastern boundary and further cultivated fields are situated to the north and east of the site. Residential housing forms the western boundary and small areas of grassland lie to the south. There is a parcel of ancient woodland approximately 450m east of the site. The grid reference of the central point of site is TQ 20123 32801.

The site was subject to protected species surveys for bats, breeding birds and great crested newts *Triturus cristatus*

¹ HM Government (2024). National Planning Policy Framework. Department for Housing, Communities and Local Government. Available online at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf.

² HM Government (2021). Environment Act 2021 Available online at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>



by suitably licenced ecologists in April of 2022. Further surveys to assess the site for badger *Meles meles* were undertaken at this time. Nest boxes were placed to check for common dormouse *Muscardinus avellanarius* in 2019, with one individual being recorded. An individual grass snake *Natrix helvetica* was also recorded on the site at this time. A house sparrow *Passer domesticus* was observed collecting nesting material on the 1st of February 2024 during a survey in the western hedgerow at TQ 1998 3276. Further badger and bat tree roost assessments were conducted in 2026. The data from these surveys is presented in detail within the Ecological Impact Assessment (EclA), by The Ecology Co-op³.

Habitats (UKHAB) within the site and along the site boundaries are shown in (Figure 1), these include:

- Modified grassland
- Arable land
- Species-rich hedgerow
- Native hedgerow
- Line of trees associated with ditch
- Bracken

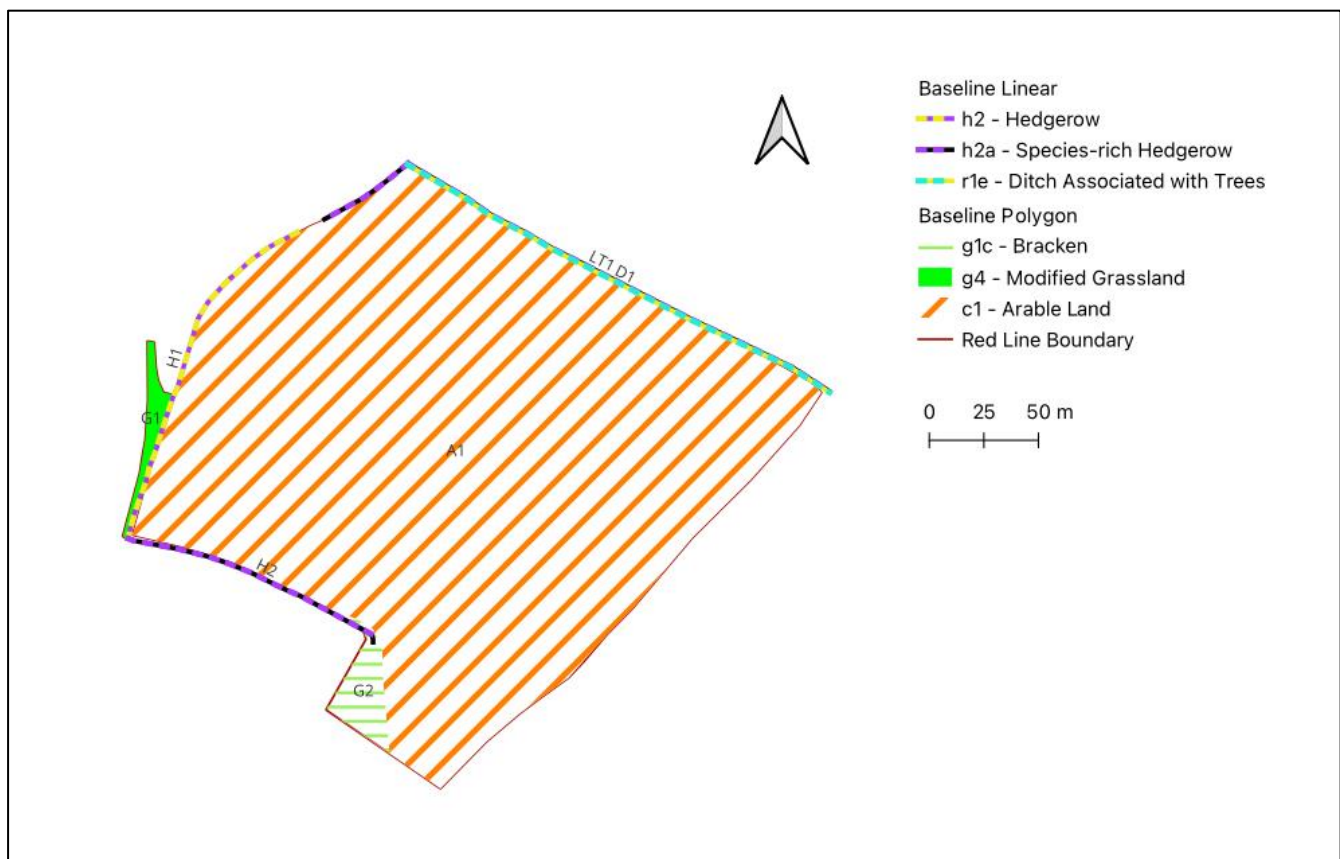


Figure 1. UKHAB map showing existing habitats within the site. The site boundary is indicated with a red line. Produced using QGIS software, version 4.06.3 – Hannover.

³ The Ecology Co-op (2026). Land south of Old Crawley Road, Faygate – EclA.



Figure 2. Illustrative Masterplan, reproduced from Paul Hewitt; chartered architect. Drawing no. 2126/PL.05. Rev J. Mar '26.

1.3 Policy and Legislation

NPPF (2024)

The NPPF sets out the Government's view on how planners should balance nature conservation with development and helps ensure that Government meets its biodiversity commitments with regards to the operation of the planning system.

Paragraph 187d, states that planning policies and decisions should contribute to and enhance the local environment by:

- *“minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.”*

Paragraph 192b, states that to protect and enhance biodiversity and geodiversity, plans should;

- *“promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Paragraph 193d, states that when determining planning applications, authorities should apply the following principle:

“development whose primary objective is to conserve or enhance biodiversity should be supported; while



opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Environment Act (2021)

The Environment Act sets a target of halting the decline in species through the inclusion of a legally binding 2030 species abundance target. Aiming to restore natural habitats and enhance biodiversity, the Act requires new developments to improve or create habitats for nature (through mechanisms such as mandatory Biodiversity Net Gain), and tackle deforestation. Going forwards, UK businesses will need to look closely at their supply chains as amongst other measures they will be prohibited from using commodities associated with wide-scale deforestation. Woodland protection measures are also strengthened through the Act.

Local Policy

Strategic Policy 17: Green Infrastructure and Biodiversity of Horsham District Council's Local Plan 2023-2040 (December 2023) requires the following:

“Relevant development proposals will be expected to deliver **12% biodiversity net gain** and must submit Biodiversity Net Gain information to show how this will be achieved using the mandated Biodiversity Metric or the Small Sites Metric as appropriate and must abide by the metric trading rules. Submissions must make clear what will be provided to meet no net loss and what will deliver net gains. The net gain must be achieved through the delivery of appropriate on-site biodiversity net gain or, where this is not practicable, through off-site net gain within the District especially areas, as suitable to the habitats subject to gain, identified in the District's Green Infrastructure Strategy or the Local Nature Recovery Strategy, or as agreed by the Council. All such schemes, excluding any respective element using statutory biodiversity credits, must submit for approval by the Council a funded maintenance and management plan, including monitoring / reporting and appropriate enforcement processes, that secures the biodiversity net gains for at least 30 years.”

1.4 Methodology

This Biodiversity Impact Calculation uses the Statutory Biodiversity Metric calculation tool published by Natural England⁴. This is used to calculate 'habitat units' and 'hedgerow units' by multiplying the area (ha) or lengths (km), 'distinctiveness' (habitat type), 'condition' (quality), and strategic significance (location in relation to the authority's local strategy) of each habitat parcel.

The calculation provides a negative value to the biodiversity units where habitat is being directly lost to development. Where habitats are enhanced or created on-site, or off-site, the calculation gives a positive value but adds risk factors that account for uncertainty - difficulty in creating new habitats and time delays while they establish; habitats that are more difficult to restore or that will take a long time to reach a set target condition will score lower and therefore make a smaller positive contribution.

Where on-site gains are equal to or larger than the losses, the project is deemed to have neutral biodiversity impact or biodiversity 'net gain' respectively.

⁴ Natural England (2023) *The Statutory Biodiversity Metric – Calculation Tool*. Available online at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>



Where on-site gains do not outweigh on-site losses and a biodiversity 'net loss' is calculated, this becomes an 'offset requirement'. Offsets can be provided by further habitat creation or enhancement in-situ or elsewhere and are assessed using the same metric to balance the predicted gains against the losses to ensure no net loss will be achieved. It follows that a biodiversity net gain can still be achieved by providing higher biodiversity gains through the offset than the net loss resulting from the development.

Note that the metric does not allow for 'trading down'; one of the key principles in measuring biodiversity net losses or gains is that habitats of high ecological importance cannot be offset by the creation of larger areas of habitats with lower value. The Statutory Biodiversity Metric calculation tool includes a 'trading down correction' that deducts the number of biodiversity units that are not accounted for through the creation of equivalent high distinctive habitats than that lost. For example, the loss of a small area of lowland meadow priority habitat (high distinctiveness) will not be offset by a larger area of modified grassland (medium distinctiveness) and will only be offset by an equivalent area of habitat of the same distinctiveness or higher.

1.5 Data Sources

This calculation uses the most up to date survey information, using botanical data gathered during the site visits on the 19th April 2022 and 22nd February 2024 where specific condition assessments were also undertaken and re-assessed on 11th December 2025. The areas of each habitat category were measured using GIS mapping tools (QGIS). Condition assessments were made in accordance with the Statutory Biodiversity Metric condition assessments document⁵ and the Statutory Biodiversity Metric: draft user guide⁶. Applying the precautionary principle, a presumption for the higher condition was used where there was any uncertainty in the condition of existing habitats.

To predict habitat/hedgerow units supported after by the site after completion of the development, the aerial imagery was overlaid by the proposed scheme layout (see Figure 2). This allowed direct losses of habitats to be measured where the built environment overlaps with pre-existing habitat, with gardens and amenity areas treated separately. The habitats that are 'created' after development are assumed to achieve the highest level of condition as appropriate; a separate landscape and enhancement plan should be produced to ensure this condition is achieved.

The Statutory Biodiversity Metric calculation tool uses a separate calculator spreadsheet for linear features. This works under the same principles as above but replaces areas of habitat with linear length of a feature. It should be noted that because linear features often have higher ecological importance, linear habitats are assigned higher distinctiveness and must be offset with other linear features. The hedgerow units generated for linear features are not equivalent or interchangeable with biodiversity calculations for areas of habitat.

1.6 Results

1.6.1 Existing Habitats Assessment

A summary of habitats and condition assessments is provided in Table 1. Full results of condition assessments for habitats which require it (using the Statutory Biodiversity Metric condition assessment document) are provided in

⁵ Natural England (2023) *Statutory Biodiversity Metric Condition Assessments* Available online at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

⁶ Natural England (2023). *Statutory Biodiversity Metric draft user guide*. Available online at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>



Appendix 1.

Overall, the on-site calculated baseline is 9.89 habitat units and 2.99 hedgerow units.

Table 1. Existing habitat conditions and correlating codes for Figure 2 within land south of Old Crawley Road, Faygate.

Habitats		Condition Assessments
UK Habitat (UKHAB) Classification System	Location/Reference (habitat parcels split if multiple areas with different condition assessments)	Condition
Arable land	Comprising majority of site	N/A
Modified grassland	West boundary close to main road	Moderate
Bracken	Area in southern area of site – G2	N/A
Species-rich hedgerow	Eastern boundary of site – H1	Poor
Species-rich hedgerow	South of site – H2	Moderate
Line of trees associated with ditch	Northern boundary – LT1 / D1	Moderate

1.6.2 Habitat Losses and Gains

The proposed development scheme at this site will result in the loss of:

On-site

- 4.749 hectares of arable land;
- 0.051 hectares of modified grassland in moderate condition;
- 0.095 hectares of bracken, and
- 0.01km of species-rich hedgerow in poor condition.

The proposed development scheme at this site will retain:

On-site

- 0.234km of line of trees associated with ditch in moderate condition, and
- 0.124km of species-rich native hedgerow in moderate condition.

The proposed development scheme at this site will enhance:

On-site

- 0.16km of species-rich native hedgerow in poor condition to moderate condition.

Post-intervention the following habitats will be created:

On-site

- 0.616ha of developed land; sealed surface;
- 0.668ha of developed land; sealed surface (buildings);
- 0.613ha of other woodland; broadleaved in moderate condition;
- 1.363ha of vegetated garden;
- 0.412ha of developed land; sealed surface (Leaps);



- 0.419ha of modified grassland in poor condition;
- 0.334ha of other neutral grassland in moderate condition;
- 0.195ha of other neutral grassland in moderate condition (SuDS);
- 0.275ha of native mixed scrub in moderate condition;
- 121 small trees (0.4927ha) in poor condition, and
- 0.597km of native hedgerow in poor condition

The overall results of the calculations are presented in Table 2. Please refer to the Statutory Biodiversity Metric calculation tool supplied with this document (submitted separately) for full details of the calculation, and trading summary results.

Table 2. Headline results of the Biodiversity Impact Calculation for the proposed development on land south of Old Crawley Road, Faygate.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	4.33
	Hedgerow units	1.96
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	43.77%
	Hedgerow units	65.45%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

1.7 Conclusions

The Statutory Biodiversity Metric calculation has demonstrated that the proposed scheme will results in a likely net gain of **4.33 habitat units (+43.77%)**.

The linear feature calculation for the proposed scheme results in a likely net gain of **1.96 hedgerow units (+65.45%)**.

The current scheme satisfies the trading rules within the Statutory Biodiversity Metric and exceeds the mandatory 10% net gain set out in the Environment Act 2021 and the 12% net gain requirement set out by Horsham District Council.

Should you need any further advice on the information provided above, please do not hesitate to contact The Ecology Co-op.



APPENDIX 1 – Habitat Condition Assessment Sheets

CONDITION ASSESSMENT SHEET FOR USE WITH STATUTORY BIODIVERSITY METRIC (SBM)- AREA BASED HABITATS			
Date	19.04.2022, 22.02.2024 and 11.12.2025	Unique polygon reference	
Surveyor name(s)	Kate Lewis, Libby Morris and Sam Lunn	SBM habitat type	Cropland
Condition assessment required? (y/n)	N		
Limitations (if applicable)	N/A		
Habitat description			
Arable field growing winter wheat.			
Photo ref			



CONDITION ASSESSMENT SHEET FOR USE WITH STATUTORY BIODIVERSITY METRIC (SBM)- AREA BASED HABITATS								
Date	19.04.2022, 22.02.2024 and 11.12.2025		Unique polygon reference					
Surveyor name(s)	Kate Lewis, Libby Morris and Sam Lunn		SBM habitat type		Modified grassland			
Condition assessment required? (Y/N)							Yes	
Onsite or offsite?	Onsite		Condition sheet used		Grassland (low)			
Limitations (if applicable)								
Habitat description								
Area of mown grassland by roadside adjacent to western hedgerow boundary. Species present include cock's-foot, broadleaved dock, cow parsley, herb Robert, creeping cinquefoil, creeping buttercup, cleavers, common mouse-ear, daisy, yarrow, knapweed, common field speedwell, oxeye daisy, perennial rye grass, betony, ribwort plantain, red fescue, doves-foot cranesbill, meadow foxtail and scattered bracken.								
Condition assessment results								
Criterion	A	B	C	D	E	F	G	Total
Result	P	F	P	F	P	P	P	5
Photo ref								
Are any criteria non-negotiable? (Y/N)	Yes – passed		Condition (Good/Moderate/Poor):		Moderate			



CONDITION ASSESSMENT SHEET FOR USE WITH STATUTORY BIODIVERSITY METRIC (SBM)- AREA BASED HABITATS			
Date	19.04.2022, 22.02.2024 and 11.12.2025	Unique polygon reference	
Surveyor name(s)	Kate Lewis, Libby Morris and Sam Lunn	SBM habitat type	Bracken g1c
Condition assessment required? (Y/N)			No
Onsite or offsite?	Onsite	Condition sheet used	n/a
Limitations (if applicable)			
Habitat description			
Area of dense bracken			
Photo ref			



CONDITION ASSESSMENT SHEET FOR USE WITH STATUTORY BIODIVERSITY METRIC (SBM)- AREA BASED HABITATS									
Date	19.04.2022, 22.02.2024 and 11.12.2025		Unique polygon reference						
Surveyor name(s)	Kate Lewis, Libby Morris and Sam Lunn		SBM habitat type		Native hedgerow				
Condition assessment required? (Y/N)								Yes	
Onsite or offsite?	Onsite		Condition sheet used		hedgerow				
Limitations (if applicable)									
Habitat description									
This hedgerow runs along the northwest boundary and measures approximately 1m high and is dominated by bramble with occasional hawthorn, oak and sycamore. Two mature sycamore trees lie outside the boundary, near the access gate. Dominant – bramble, Occasional – hawthorn, oak, sycamore Rare – ash, holly, fruit tree (likely <i>Malus sp.</i>), bracken.									
Condition assessment results									
Criteria	A1	A2	B1	B2	C1	C2	D1	D2	Total
Results	F	F	P	F	F	F	P	F	2
Photo ref									
Are any criteria non-negotiable? (Y/N)	No		Condition (Good/Moderate/Poor):		Poor				



CONDITION ASSESSMENT SHEET FOR USE WITH STATUTORY BIODIVERSITY METRIC (SBM)- AREA BASED HABITATS									
Date	19.04.2022, 22.02.2024 and 11.12.2025		Unique polygon reference						
Surveyor name(s)	Kate Lewis, Libby Morris and Sam Lunn		SBM habitat type		Native hedgerow				
Condition assessment required? (Y/N)								Yes	
Onsite or offsite?	Onsite		Condition sheet used		hedgerow				
Limitations (if applicable)									
Habitat description									
This hedgerow measures, on average, approximately 1.5 m high and is dominated by hawthorn running along the southwest boundary. Dominant – hawthorn, Occasional – bracken, bramble, Rare – ash, <i>Cypress sp.</i> Towards the eastern end of this hedgerow there is a post and wire fence that measures approximately 25 m in length, with a beech hedgerow and one cotoneaster bush on the outside of the boundary. At the end of the beech hedging there is an 8 m gap, which opens onto a residential driveway.									
Condition assessment results									
Criteria	A1	A2	B1	B2	C1	C2	D1	D2	Total
Results	P	P	F	F	F	P	P	F	4
Photo ref									
Are any criteria non-negotiable? (Y/N)	No		Condition (Good/Moderate/Poor):		Moderate				



CONDITION ASSESSMENT SHEET FOR USE WITH STATUTORY BIODIVERSITY METRIC (SBM)- AREA BASED HABITATS						
Date	19.04.2022, 22.02.2024 and 11.12.2025	Unique polygon reference				
Surveyor name(s)	Kate Lewis, Libby Morris and Sam Lunn	SBM habitat type		Line of Trees with associated ditch		
Condition assessment required? (Y/N)						Yes
Onsite or offsite?	Onsite	Condition sheet used		Line of trees		
Limitations (if applicable)						
Habitat description						
A line of trees runs along the outside of a ditch, and includes the occasional semi-mature tree. The ditch has steep sided banks and lacks vegetation. East end: Frequent – hawthorn <i>Crataegus monogyna</i>, ivy <i>Hedera helix</i>, bramble Occasional – oak Rare – rose <i>Rosa sp.</i>, honeysuckle There is a 9m gap in the hedgerow, providing access to an adjacent field. West end: Frequent – hazel <i>Corylus avellana</i> Occasional – silver birch, gorse, blackthorn <i>Prunus</i>						
Condition assessment results						
Criteria	A	B	C	D	E	Total
Results	P	P	P	F	P	4



Photo ref			
Are any criteria non-negotiable? (Y/N)	No	Condition (Good/Moderate/Poor):	Moderate