

Biodiversity Net Gain Assessment

Woodmans, Copthorne Common

April 2026

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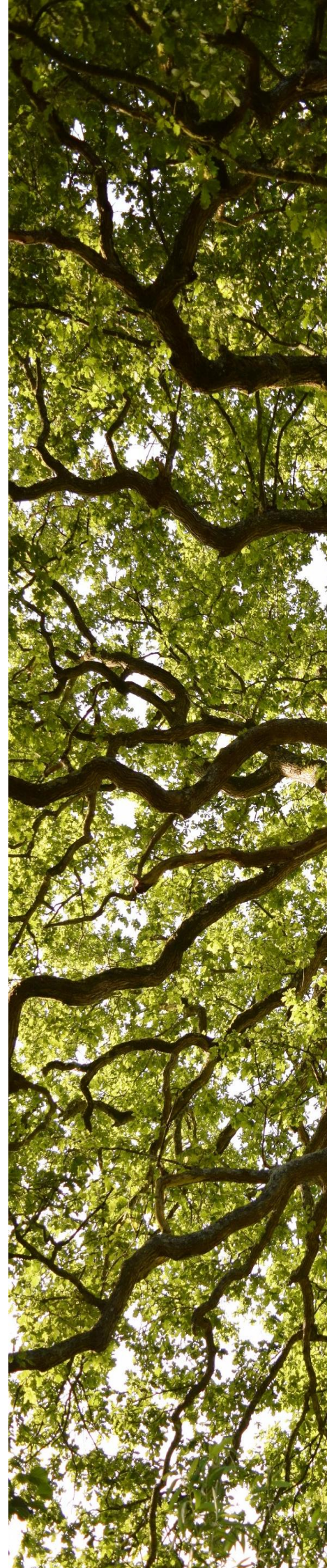
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CONTENTS	
1.0.	SUMMARY3
2.0.	INTRODUCTION AND METHODOLOGY4
3.0.	BASELINE CONDITIONS AND DEVELOPMENT IMPACTS6
4.0.	RESULTS AND CONCLUSION6
APPENDIX A: PHOTOGRAPHS.....9	
APPENDIX B: LEGISLATION.....10	



1.0. SUMMARY

The proposed development at Woodmans, Copthorne Common, involves a change of use across a 0.3-hectare site from holiday use (C1) to residential (C3). This project includes the consolidation of two existing cabins into a single three-bedroom dwelling, the retention of a third cabin for ancillary purposes, and the continued use of the established access track.

A Biodiversity Net Gain assessment identified the primary habitats as poor-condition modified grassland with high-distinctiveness deciduous woodland boundary habitat. The woodland forms part of a larger block of ancient woodland, necessitating the use of the main statutory biodiversity metric tool despite the small scale of the redline boundary.

The current assessment indicates a biodiversity loss of -8.33%, representing a deficit of -0.03 area units. Consequently, the proposal does not currently adhere to the mandatory 10% net gain requirement or the statutory trading rules set out by the Environment Act 2021. This shortfall is largely attributed to the reclassification of retained grassland as 'vegetated garden' within the residential curtilage. Under statutory guidelines, enhancements in private gardens are excluded from contributing to significant biodiversity net gain because they cannot be legally secured for the required 30-year period through mechanisms such as Section 106 agreements or conservation covenants.

To achieve legal compliance, off-site mitigation is necessary, as there is no further scope for on-site habitat creation. The development requires a total of 0.07 units to meet the 10% gain target. The available route for the applicant is to purchase the 0.07 units from a recognised offsite provider or the 0.15 statutory biodiversity credits (Tier A1). Upon planning approval, these units or credits should be secured via the recognised channels to satisfy the mandatory biodiversity gain condition and ensure the project fulfils its legal obligations.

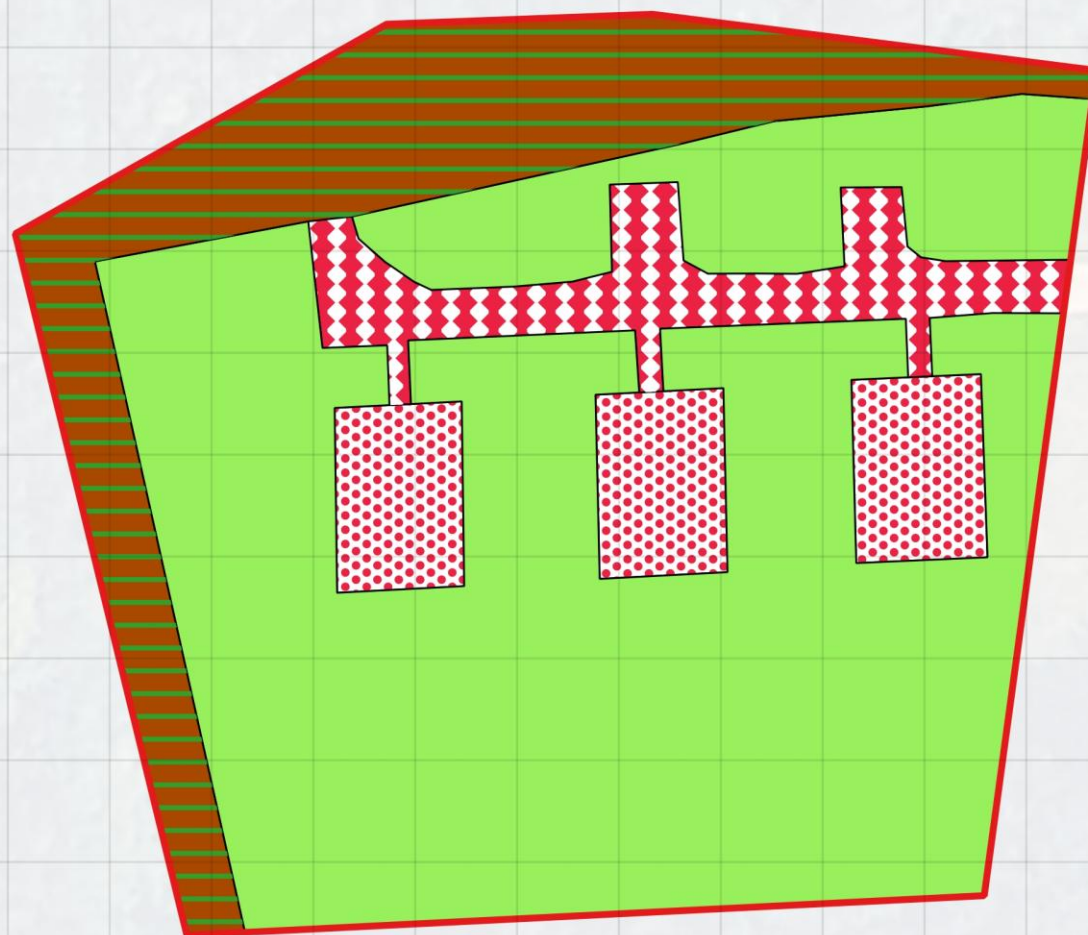


Site location plan.



2.0. INTRODUCTION AND METHODOLOGY

- 2.1. Kent Sussex Ecology was commissioned to undertake a Biodiversity Net Gain (BNG) assessment at Woodmans, Copthorne Common, Copthorne, Crawley, West Sussex, RH10 3JU. The site is centred around grid reference TQ31753845.
- 2.2. The redline boundary (as derived from submitted block plan TQRQM26041140543648 with application DM/26/0207) is 0.3-hectares in size and features developed land (including holiday cabins and access track), modified grassland and wooded boundaries. The proposed development is for change of Use from C1 (holiday use) to C3 (residential), with the consolidation of two cabins into a single-storey, three-bedroom dwelling and retention of third cabin as ancillary building.
- 2.3. The site was surveyed on 31st March 2026 by Chris Brown BSc; a CIEEM-accredited ecologist with over 9 years' experience as a professional ecologist. A BNG assessment was carried out in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), using the main statutory biodiversity net gain metric tool. The guidance in the 'Statutory Biodiversity Metric User Guide' and the condition assessment sheets (Technical Annex 1) were used to inform the metric inputs. The calculations and condition assessments will accompany this report. While the redline boundary is less than 0.5ha in size, the main BNG metric tool was used for calculations due to the presence of 'high distinctiveness' woodland boundary habitat.
- 2.4. Regarding metric inputs, the four rules to be adhered to for results to be valid are:
 - Satisfying the in-metric trading rules;
 - Unit outputs for each type of unit must not be summed, traded, or converted between types, to deliver an overall 10% gain;
 - To accurately apply the biodiversity metric formula, the statutory biodiversity metric calculation tool must be used, and;
 - Deviation from this biodiversity metric methodology may be permitted by the relevant planning authority in exceptional circumstances only.
- 2.5. The botanical survey was carried out along with the PEA. Not all flowering annuals would have been observable (in flowering or vegetative form) at the time; however, a botanical survey at this time and at this site is considered sufficient to determine the broad habitat type of the area to be impacted. A precautionary approach was taken where the condition could not be definitively assessed, and follow up surveys in the flowering season may be required.
- 2.6. To ensure accurate input baseline data was used, a botanical assessment of the grassland, using targeted quadrats, was conducted and georeferenced on-site and synchronised with QGIS for mapping. The associated condition assessments can be found within the metric calculations document. Habitats were mapped in accordance with the UK Habitat Classification system (UKHab), along with the completion of the requisite condition assessments to inform Biodiversity Net Gain (BNG) calculations.



0 5 10 15 20 m

-  Site boundary
-  u1 828 Vegetated garden
-  u1b5 Building
-  u1b6 Other developed land
-  w1f7 Lowland mixed deciduous woodland



Woodmans, Copthorne Common
Baseline Habitat Plan Rev A
Scale 1:700
11.04.2026

Drawn by Chris Brown
Edited by Luke Wallace
Reproduced with Google Satellite and QGIS



3.0. BASELINE CONDITIONS AND DEVELOPMENT IMPACTS

- 3.1. The site's area habitat primarily consists of poor condition modified grassland (see existing habitat plan on page 5), being a tightly-mown amenity lawn environment with predominance of Perennial ryegrass *Lolium perenne*. Forbs included White clover *Trifolium repens* and Lawn daisy *Bellis perennis*, which are indicative of low-value grassland. The access track and three cabins were assigned the category of 'developed land; sealed surface'. The only other habitat within the redline boundary is good condition 'lowland mixed deciduous woodland', which encroaches upon the periphery of the redline boundary (which forms part of a larger, surrounding block of ancient woodland).
- 3.2. The development will involve the partial replacement of modified grassland with the consolidation of two of the cabins into one residential dwelling (see proposed habitat plan on page 8). While the vast majority of the grassland will be retained, as the development is for change of use to residential, with the provision of a three-bedroom dwelling, the retained grassland has been assigned the category of 'vegetated garden'. The woodland boundary vegetation will be retained.
- 3.3. Under the statutory biodiversity metric, habitat creation or enhancement within the curtilage of a private garden is excluded from contributing to significant biodiversity net gain. This restriction is primarily due to the legal requirement that any biodiversity uplift must be secured for a minimum of 30 years, typically via a Section 106 agreement or a conservation covenant. To meet the mandatory 10% uplift, developers must instead focus on significant gains within communal public open space or secure registered off-site units that are subject to formal management and monitoring plans.

4.0. RESULTS AND CONCLUSION

- 4.1. The result denotes a biodiversity loss of -8.33% (see headline result table below). Consequently, the development does not adhere to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) without further action.

FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)			<i>Area habitat units</i>	-0.03
			<i>Hedgerow units</i>	0.00
			<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)			<i>Area habitat units</i>	-8.33%
			<i>Hedgerow units</i>	0.00%
			<i>Watercourse units</i>	0.00%
Trading rules satisfied?			No - Check Trading Summaries ▲	
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
<i>Area habitat units</i>	10.00%	0.40	0.44	0.07
<i>Hedgerow units</i>	10.00%	0.00	0.00	0.00
<i>Watercourse units</i>	10.00%	0.00	0.00	0.00

Headline results.

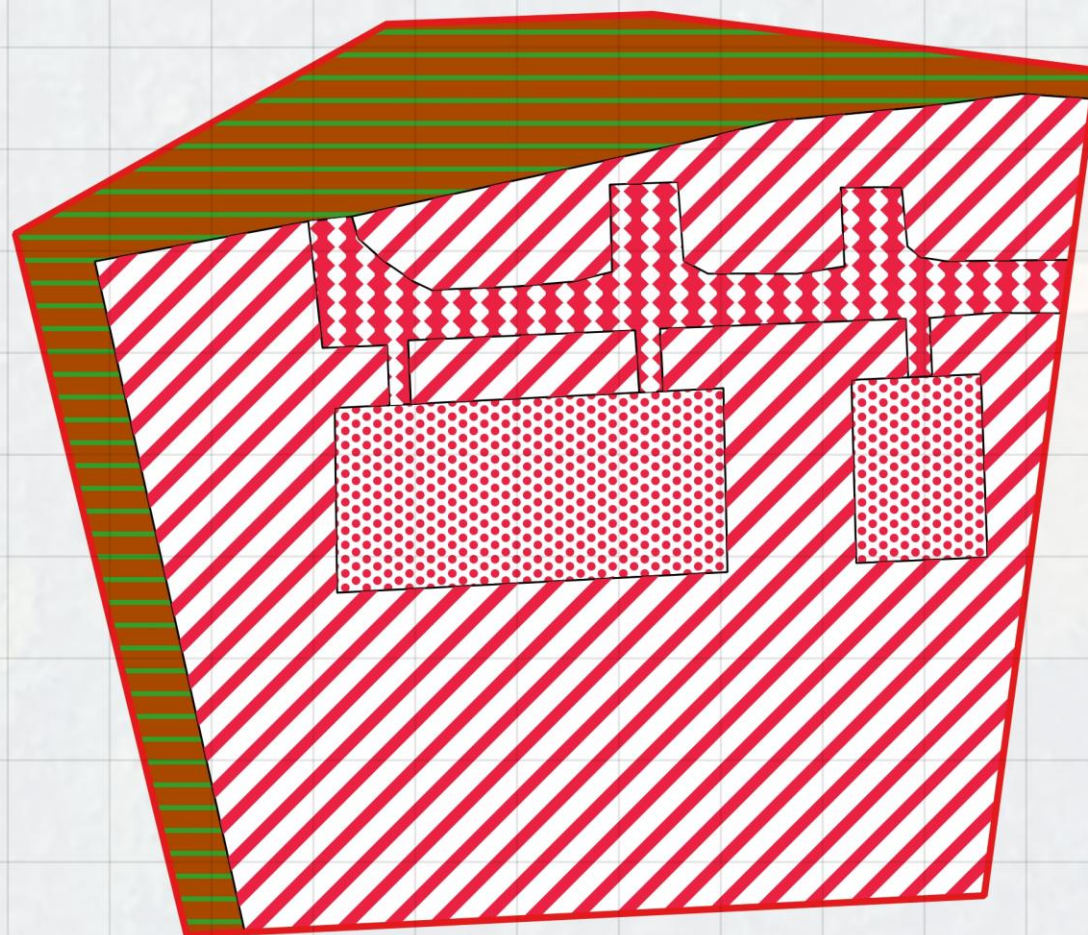


- 4.2. Under the requirements of the Environment Act 2021, the development must demonstrate a minimum 10% net gain to be considered compliant. The current proposal results in a deficit of 0.07 area units and, therefore, fails to meet both the statutory percentage increase and the mandatory trading rules.
- 4.3. Given that there is no feasible scope for on-site habitat creation or enhancement due to the 'private garden' nature of the site, an off-site option has to be utilised. Off-site providers should be approached in the first instance, as per the mitigation hierarchy. As the unit requirement is relatively small, off-site units may be unavailable from registered providers. If this is the case, the applicant will be required to purchase statutory biodiversity credits. This financial contribution will facilitate the delivery of necessary biodiversity units off-site, ensuring the development meets its legal obligations and achieves the required 0.15 total units necessary to satisfy the 10% gain target.

Credits Required by Tier/Module		
Tier	Credits Required	
A1	0.15	▲
A2	0.00	
A3	0.00	
A4	0.00	
A5	0.00	
H	0.00	
W	0.00	

Credit requirement.

- 4.4. As shown in the table above, the credit requirement is 0.15 (tier A1), which can be purchased here [Buy statutory biodiversity credits - GOV.UK](#) once the associated application has been approved.



0 5 10 15 20 m

-  Site boundary
-  u1 828 Vegetated garden
-  u1b5 Building
-  u1b6 Other developed land
-  w1f7 Lowland mixed deciduous woodland



Woodmans, Copthorne Common
Proposed Habitat Plan Rev A
Scale 1:700
11.04.2026

Drawn by Chris Brown
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APPENDIX A: PHOTOGRAPHS



The existing cabins, viewing east.



The access and parking areas, viewing east.



APPENDIX B: LEGISLATION

Biodiversity Net Gain Legislation

The Environment Act 2021 introduced mandatory BNG requirements in England, amending the Town and Country Planning Act 1990 (Schedule 7A). Implementation began February 12, 2024, with some exceptions for smaller developments.

Key Requirements:

- Most new developments requiring planning permission must achieve a measurable net gain in biodiversity of at least 10%.
- This is assessed using a standardized metric that assigns values to different habitat types.
- Developers must demonstrate how they will achieve BNG through habitat creation, enhancement, or compensation measures.
- BNG plans must consider a minimum 30-year management period to ensure biodiversity gains are sustained.

A biodiversity net-gain (BNG) assessment involves making a comparison between the biodiversity value of habitats present within the site prior to development (the 'baseline') and the predicted biodiversity value of habitats following the completion of the development (i.e., 'post-development'). The comparison is made in terms of 'biodiversity units', with a 'biodiversity metric' providing the mechanism to allow biodiversity values to be calculated and compared.

The metric calculates the overall loss or gains of biodiversity for development projects by assessing the distinctiveness (type of habitat and its value), condition, extent, and strategic significance of habitats on site pre- and post-development. To achieve biodiversity net gain, the biodiversity unit score must have a post-development score higher than the baseline score. When calculating the post-development biodiversity units, the metric includes a series of standard 'risk multipliers' to account for the inherent risk of creating and restoring habitats, the time taken to establish habitats and the location of the mitigation in relation to the habitats lost on site. The risk multipliers have the effect of reducing the value of the proposed habitats, which means larger areas, habitats of higher distinctiveness, and/or condition are required to achieve net gain.

The metric assesses and generates separate outputs for area-based habitats (measured in habitat units) and linear based habitats, including hedgerows (measured in hedgerow units) and rivers (measured in river units). For the purpose of the BNG assessment, the output with the lowest value is used to determine whether following development there has been a net gain in biodiversity.

Distinctiveness

Each habitat is assigned a score for distinctiveness. Distinctiveness includes parameters such as species richness, diversity, rarity (at local, regional, national, and international scales) and the degree to which a habitat supports species rarely found in other habitats (Treweek et al., 2010). The categories for distinctiveness within the metric are shown within the Natural England guidance.

Condition

The condition of each habitat is assessed using the methods set out in the Auditing and accounting for biodiversity value: technical supplement. This approach determines how many of the condition criteria descriptions for each habitat type are met or are not met. This is used as a guide but may be superseded where appropriate by other evidence and best ecological judgement. Where this is the case, additional information is provided in the tables used to the condition assessment. Conditions and associated scores in the Natural England. Certain habitats are allocated a fixed condition score and do not need their condition to be assessed.



Strategic Significance

The metric requires that the strategic significance of all baseline and post-development habitats be defined. Strategic significance refers to areas of local priority for biodiversity and nature improvement, identified within local planning policies. As part of this assessment, the relevant local planning policy documents were reviewed to determine the strategic significance of the habitats on site.