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19th December 2025

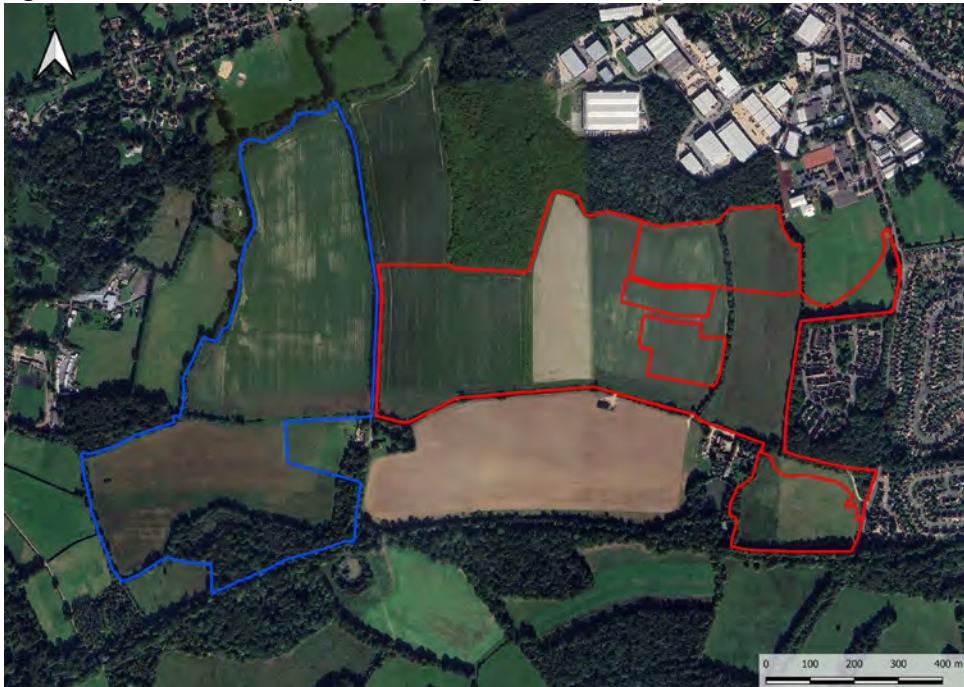
RE: Imberhorne Farm, BNG Assessment

This letter serves the purpose of reporting the findings of a Biodiversity Net Gain Assessment completed by Ecosupport Ltd on Imberhorne Farm, East Grinstead.

Site Information

The site comprises of several arable parcels separated by boundary hedgerows and trees with a parcel of woodland on the southwest. The site is located to the east of Imberhorne Lane, East Grinstead, West Sussex, RH19 1RP (centred on OS grid reference TQ 36810 38625) (**Figure 1**). The site is situated west of the town of East Grinstead and is immediately surrounded by woodland compartments, agricultural fields and residential development.

Figure 1. Redline boundary of the site (Google Satellite 2024)



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Proposals

Proposals for the site include the construction of residential housing units with associated infrastructure and mixed-use element, including a new school development and care village. The development will be considered in conjunction with the SANGS proposals to the west.

Methodology

The methodology for the assessment follows the Natural England Statutory Biodiversity Metric habitat condition assessment protocols and uses the Statutory Biodiversity Metric calculation tool to calculate biodiversity losses and gains (DEFRA, 2023b, updated 2024).

Assessment Approach

The Biodiversity Net Gain (BNG) assessment presented in this report relates solely to the residential Reserved Matters parcel within the wider development, which was previously submitted under outline application DM/23/2699. This assessment does not include habitats associated with the Suitable Alternative Natural Greenspace (SANG), school, sports pitches or care home.

At the time the outline application (DM/23/2699) was submitted, BNG was not a statutory requirement, therefore the Imberhorne Farm development is not bound by the statutory requirement to achieve a +10% net gain on site. In order to deliver a positive outcome for biodiversity the development aims to achieve a measurable net gain of over 1%.

Limitations

There were not considered to be any limitations on the results of the habitat assessment as they were undertaken during good weather conditions and during the optimal time of the year (with regards to the presence of flowering plants). As such, it was considered an accurate assessment of the habitats could be made along with the conditions of the habitats (for factoring into the BNG calculations).

Existing Habitats

Table 1. Existing habitats present on site including details as to their condition and the condition assessment criteria that have been met / failed as per the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b, updated 2024).

Habitat Type	Area (ha)	Condition	Condition Assessment Notes	Strategic Significance
Temporary grass and clover leys	22.992	Condition Assessment N/A	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy
Modified grassland	5.809	Poor	The Modified Grassland on site has bare ground, scattered rushes and is seasonally wet. Typical species were present (Ribwort Plantain, Creeping Buttercup, Dandelion, Nettle, Thistle, Hogweed, Tufted Vetch, Ragwort, Soft Rush, Southern Woodrush and Perennial Rye Grass) indicative of this habitat type. There was also scattered bramble scrub present. The ground had been damaged by access in some areas leading to bare ground being present. Passes 3 of 6 criteria (C, F, G) but fails essential criteria A (for moderate or good condition)	Area/compensation not in local strategy/ no local strategy
Bramble scrub	1.338	Condition Assessment N/A	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy

Lowland mixed deciduous woodland	0.526	Moderate	The Lowland Mixed Deciduous Woodland present in the southwest and around the site boundaries in the southeast comprised of a number of mature tree species (Oak, Silver Birch, Holly, Hawthorn and Hazel). The woodland also has two age classes, no invasive species or browsing damage, limited open space and few deadwoods. Passes 30 out of the possible 39 (A2, B3, C3, D3, E3, F3, G2, H3, I2, J2, K1, L1, M2)	Area/compensation not in local strategy/ no local strategy
Artificial unvegetated, unsealed surface	0.103	N/A - Other	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy
Developed land; Sealed surface	0.189	N/A - Other	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy
Urban trees	0.1099	Good	3 individual oak trees proposed to be removed for access in the southeast of the site. Passes 5 of 6 criteria (A, B, C, D, F).	Area/compensation not in local strategy/ no local strategy
Urban trees	0.0765	Good	1 individual veteran oak tree proposed to be removed for access in the southeast of the site. Passes 6 of 6 criteria (A, B, C, D, E, F).	Area/compensation not in local strategy/ no local strategy

Table 2. Existing linear habitats present on site including details as to their condition and the condition assessment criteria that have been met / failed as per the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b).

Habitat Type	Length (km)	Condition	Condition Assessment Notes	Strategic Significance
Native hedgerow	0.239	Poor	Hawthorn hedgerow with large amounts of flail damage along the hedgerow and within the vegetation surrounding it. Specifically, Criteria A1, A2, B2, D2	Area/compensation not in local strategy/ no local strategy
Species-rich Native Hedgerow	0.17	Moderate	A species-rich native hedgerow was present along the southern boundary. The hedgerow supported Hawthorn, Hazel, Dogwood, Bramble, Ivy and <i>Salix</i> sp. also recorded. Specifically, Criteria A1, A2, C1, D1	Area/compensation not in local strategy/ no local strategy
Line of trees	0.676	Moderate	Line of native trees comprising of Oak, Rowan, Hawthorn, Holly, Horse Chestnut, Silver Birch and Willow with a complete canopy but no undisturbed naturally vegetated strip of at least 6 m on both sides present. Specifically, Criteria A, B, C and E were met.	Area/compensation not in local strategy/ no local strategy
Line of trees - associated with bank or ditch	0.309	Moderate	Line of native trees with a ditch comprising of Field Maple, Ash, Wild Cherry, Goat Willow, Common Alder, Lime with a complete canopy but no undisturbed naturally vegetated strip of at least 6 m on both sides present. Specifically, Criteria A, B, C and E were met.	Area/compensation not in local strategy/ no local strategy

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Proposed Habitats

Table 3. Non-linear habitats to be retained, enhanced and created on site including details as to the condition assessment criteria that must be met in order to achieve the targeted condition.

Habitat Type	Action	Area (ha)	Target Condition	Condition Assessment Notes	Strategic Significance
Lowland Mixed Deciduous Woodland	Retained	0.03172	Moderate	The woodland present on site will be retained with ongoing management to ensure its condition remains as 'Moderate'.	Area/compensation not in local strategy/ no local strategy
Bramble Scrub	Retained	0.12507	Condition Assessment N/A	No condition assessment required as per the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b).	Area/compensation not in local strategy/ no local strategy
Modified Grassland	Retained	0.0113	Poor	The modified grassland present on site will be retained with ongoing management to ensure its condition remains as at least 'Poor'.	Area/compensation not in local strategy/ no local strategy
Developed land; sealed surface - Buildings	Created	3.75448	N/A - Other	No condition assessment required as per the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b).	Area/compensation not in local strategy/ no local strategy

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Developed land; sealed surface – Hard Standing	Created	9.5267	N/A - Other	No condition assessment required as per the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b).	Area/compensation not in local strategy/ no local strategy
Vegetated garden	Created	6.23866	Condition Assessment N/A	No condition assessment required as per the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b).	Area/compensation not in local strategy/ no local strategy
Other neutral grassland	Created	4.08603	Moderate	Other neutral grassland of Moderate condition will be created in line with the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b). Specifically, criteria A, B, C, D and E will be targeted for achievement with sowing of an appropriate seed mix and appropriate management to minimise bare ground, scrub and bracken and maintain a varied sward height.	Area/compensation not in local strategy/ no local strategy
Modified grassland	Created	3.45397	Moderate	Modified grassland of Moderate condition will be created in line with the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b). Specifically, criteria A, C, E, F and G will be targeted for achievement with sowing of an appropriate seed mix and appropriate management to minimise scrub and bracken and removal of any invasive species.	Area/compensation not in local strategy/ no local strategy

Mixed scrub	Created	2.14902	Moderate	Mixed scrub planting of moderate condition will be created in two areas in line with the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b).	Area/compensation not in local strategy/ no local strategy
Lowland Mixed Deciduous Woodland	Created	0.07928	Moderate	Lowland mixed deciduous woodland of moderate condition will be created in line with the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b). Specifically, criteria C, D and E will be focused on to ensure native species cover the majority of the woodland.	Area/compensation not in local strategy/ no local strategy
Sustainable drainage system	Created	0.92749	Moderate	Three SUDs will be created to Moderate condition created in line with the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b). Specifically, criteria A, B, C, D, E1 and E2 will be targeted for achievement through appropriate management to ensure varied structure and lack of duckweed, algae or invasive species. The SUDs have been positioned adjacent to medium distinctiveness habitats, with limited shading from adjacent trees or shrubs.	Area/compensation not in local strategy/ no local strategy
Reedbeds	Created	0.06476	Moderate	Within the three SUDs, reedbeds will be created to Moderate condition created in line with the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b). Specifically, criteria A, B, C, D, E, F and I will be targeted for achievement through appropriate management to ensure varied structure and lack of duckweed, algae or invasive species.	Area/compensation not in local strategy/ no local strategy

Individual native trees	Created	1.5553	Poor	382 Individual trees are proposed to be planted across the site. These will be created in line with the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b). These will be native trees. Specifically, criteria B and F will be targeted.	Area/compensation not in local strategy/ no local strategy
Individual non-native trees	Created	1.3884	Poor	341 Individual trees are proposed to be planted across the site. These will be created in line with the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b). These will be native trees. Specifically, criteria B and F will be targeted.	Area/compensation not in local strategy/ no local strategy
Allotments	Created	0.50965	Moderate	Allotments of moderate condition are proposed to be created in the northwest of the site in line with the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b). Specifically, criteria A, B, and C will be targeted for achievement of through varied plant structure and species and the reduction of invasive species.	Area/compensation not in local strategy/ no local strategy

Table 4. Linear habitats to be retained, enhanced and created on site including details as to the condition assessment criteria that must be met in order to achieve the targeted condition.

Habitat Type	Action	Length (km)	Target Condition	Condition Assessment Notes	Strategic Significance
Native hedgerow	Retained	0.235	Poor	The majority of the native hedgerow (H) present on site will be retained with ongoing management to ensure its condition remains as at least 'Poor'.	Area/compensation not in local strategy/ no local strategy
Species-rich native hedgerow	Retained	0.137	Moderate	The majority of the species rich native hedgerow (H2) present on site will be retained with ongoing management to ensure its condition remains as 'Moderate'.	Area/compensation not in local strategy/ no local strategy
Line of trees	Retained	0.644	Moderate	Line of trees T5 & T7 present on site are to be retained with ongoing management to ensure its condition remains as 'Moderate'.	Area/compensation not in local strategy/ no local strategy
Line of trees - associated with bank or ditch	Retained	0.268	Moderate	The majority of the line of trees with associated ditch (T4) present on site is to be retained with ongoing management to ensure its condition remains as 'Moderate'.	Area/compensation not in local strategy/ no local strategy
Non-native and ornamental hedgerows	Created	3.926	Poor	No condition assessment required as per the Statutory Biodiversity Metric Technical Annex 1 (Defra, 2023b).	Area/compensation not in local strategy/ no local strategy

Species rich native hedgerows	Created	2.154	Moderate	A number of species rich native hedgerows are proposed to be planted across the site. These are expected to have at least five native species. The hedgerows will be regularly managed especially where adjacent to footpaths and access roads to ensure visibility. Specifically, B1, B2, C2, D1 and D2 will be targeted.	Area/compensation not in local strategy/ no local strategy
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Metric Calculation

Following the incorporation of the above measures into the DEFRA Statutory Biodiversity Metric, on site **there is a net gain of +11.35% in habitats (or +8.12 habitat units) and a net gain of +305.38% in hedgerows (or +17.64 hedgerow units), however the trading rules have not been satisfied** due to the loss of Lowland Mixed Deciduous Woodland (w1f).

Although the trading rules are not fully met, the development is not subject to the statutory requirement to deliver a minimum 10% Biodiversity Net Gain, as the application was submitted prior to February 2024. However, a positive net gain has been targeted and achieved in order to secure an overall beneficial outcome for biodiversity.

Relative to the outline application, the developable site boundary has been reduced through the removal of the sports pitches, school and care home parcels, thereby reducing the area available for on-site habitat creation. The Suitable Alternative Natural Greenspace (SANG), while excluded from the BNG calculation, will deliver over 30 hectares of habitat provision and biodiversity enhancement. When the on-site net gain and the additional 30+ hectares of habitat creation within the SANG are considered together, the proposals are assessed to provide a sufficiently robust and proportionate gain for biodiversity.

Figure 2. Screenshot of the 'headline results' output from the BNG assessment undertaken for the site using the DEFRA Statutory Biodiversity Metric.

On-site baseline	Area habitat units	71.50	
	Hedgerow units	5.78	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	79.62	
	Hedgerow units	23.42	
	Watercourse units	0.00	
On-site net change (units & percentage)	Area habitat units	8.12	11.35%
	Hedgerow units	17.64	305.38%
	Watercourse units	0.00	0.00%
Off-site baseline	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Area habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	8.12	
	Hedgerow units	17.64	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
FINAL RESULTS			
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	8.12	
	Hedgerow units	17.64	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	11.35%	
	Hedgerow units	305.38%	
	Watercourse units	0.00%	
Trading rules satisfied?	No - Check Trading Summaries ▲		

6.0 CONCLUSION

A Biodiversity Net Gain Assessment was undertaken for 'Land at Imberhorne Farm, East Grinstead'. At this stage the assessment identified that based on plans currently available, the proposals will result in a **net gain of +11.35% in habitats (or +8.12 habitat units) and a net gain of +305.38% in hedgerows (or +17.64 hedgerow units)**. Habitat creation on site includes modified grassland, other neutral grassland, mixed scrub and individual trees in addition to native hedgerows around the site. To provide compensation for the loss of habitats on site. The manner in which the habitats should be managed is also detailed within this report, this includes how frequently and at what time of year this should be carried out.

Although trading rules are not fully met, the development is exempt from the statutory 10% BNG requirement as the application was submitted prior to February 2024. A positive net gain has however been targeted and achieved. In addition to the reserved matters application associated with the residential element of the scheme, the adjacent Suitable Alternative Natural Greenspace (SANG) will deliver over 30 ha of additional habitat provision and enhancement (although excluded from formal BNG calculations), ensuring a robust and proportionate biodiversity outcome for the scheme overall.

APPENDIX 1 – BASELINE HABITATS MAP



Legend

-  Redline boundary
-  Blueline boundary
-  Hedgerow (h2)
-  Hedgerow (priority habitat) (h2a)
-  Line of trees (w1g6)
-  Modified grassland (g4)
-  Lowland mixed deciduous woodland (w1f)
-  Dense scrub (h3)
-  Blackthorn scrub (h3a)
-  Temporary grass and clover leys (c1b)
-  Artificial unvegetated unsealed surface (u1c)



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Map	UKHabs Baseline Map
Site	Imberhorne Farm, East Grinstead
Client	Vistry
Date	19/12/2025

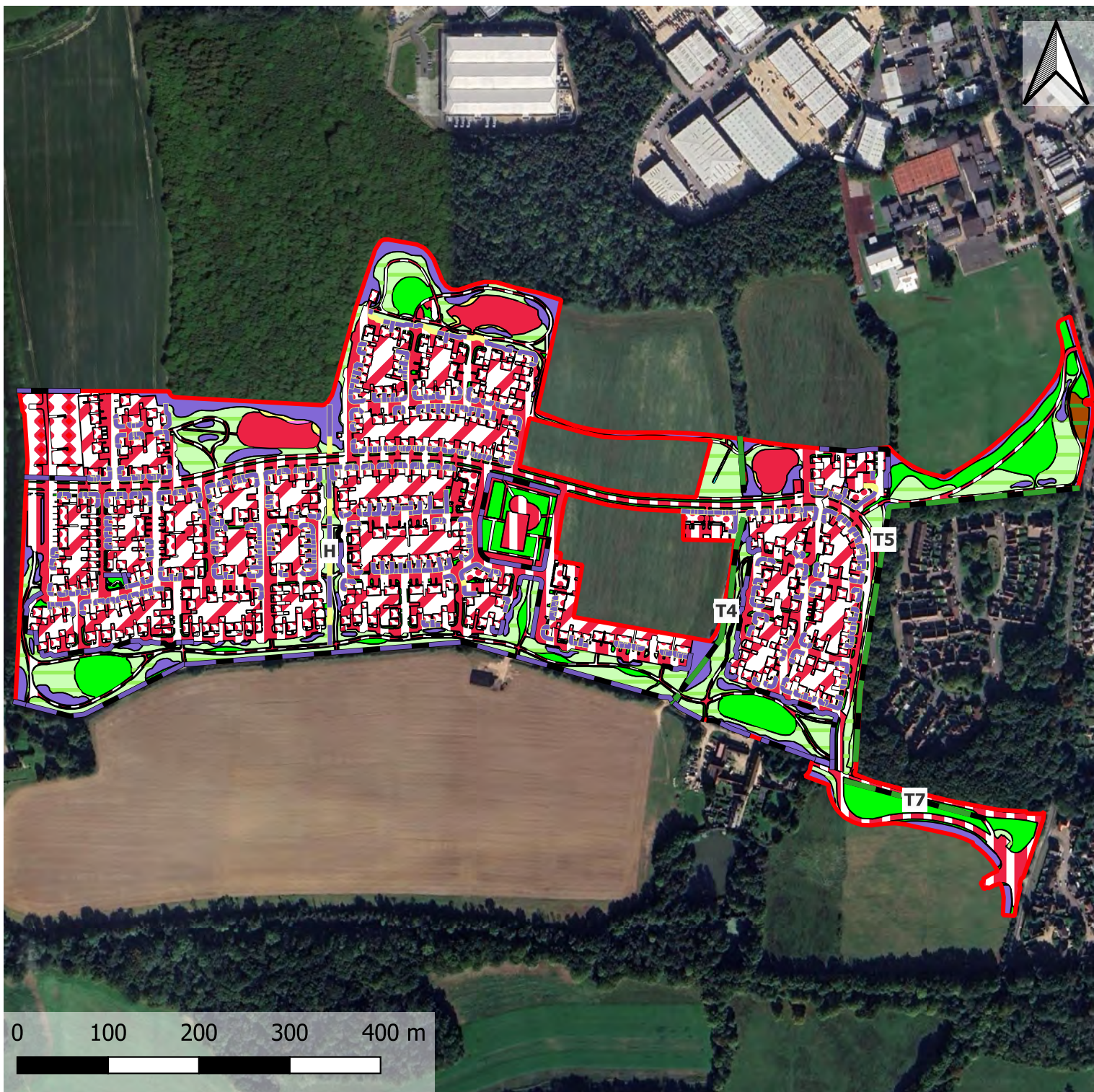
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APPENDIX 2 – POST DEVELOPMENT HABITAT MAP

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Legend

- Site Boundary
- Hedgerow (h2)
- Hedgerow (priority habitat) (h2a)
- Line of trees (w1g6)
- Other neutral grassland (g3c)
- Modified grassland (g4)
- Lowland mixed deciduous woodland (w1f)
- Native shrub planting (h)
- Dense scrub (h3)
- Reedbeds (f2e)
- SUDs (u)
- Vegetated gardens (u1)
- Developed land. sealed surface (u1b)
- Buildings (u1b5)
- Allotments (u1d)



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Map	UKHabs Post Dev Map
Site	Imberhorne Farm, East Grinstead
Client	Vistry
Date	16/12/2025

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