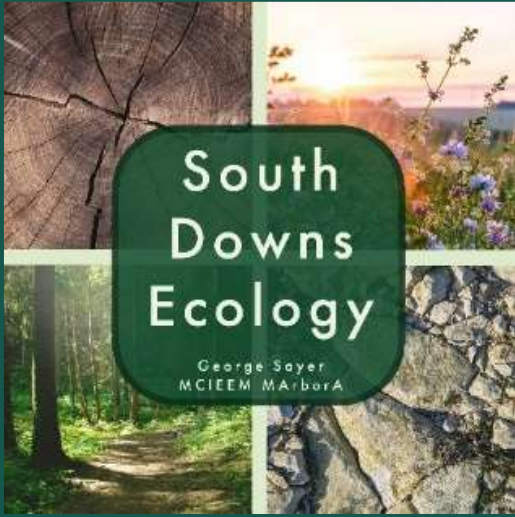


**Biodiversity
Net Gain
Assessment**

**Proposals at Cowplain
School**



**South
Downs
Ecology**

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Biodiversity Net Gain Assessment

Proposals at Cowplain School

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Summary

The Cowplain School has commissioned a Biodiversity Net Gain Assessment of proposals for a new theatre at the Cowplain School grounds.

The site consists of existing modified grassland, trees, and bramble scrub.

A quantitative assessment of the ecological impact of the proposals has been undertaken through use of the Natural England statutory Metric (2025). The calculation is completed to confirm whether the proposals accord with the National Planning Policy Framework (2024), and Havant Local Plan Policies.

The proposals would result in a 0.27 Unit 11.47% net gain in habitat units.

The proposals include potentially-significant enhancements which would be secured through a condition of planning which includes a requirement for a habitat management and monitoring plan.

The proposals achieve a gain and as such the proposals accord with the Environment Act 2021, relevant Havant local policies and the guidance within the NPPF (2024).

1.0 Introduction

- 1.1 The Cowplain School has commissioned a Biodiversity Net Gain Assessment of proposals for a new theatre at the Cowplain School grounds.
- 1.2 The following report details the rationale, methodology, calculation, and management required as part of this assessment. This assessment has been carried out by George Sayer (BSc(Hons) Environmental Sciences, PgDip Endangered Species Recovery, MCIEEM, MArborA).

Site Description

- 1.3 The site consists of a carpark with access road and footpaths, and an area of modified grassland forming part of the play / amenity area of the school, with 2no. large trees present. A clump of aspen line the northern boundary and a coniferous hedgerow lies just off-site to the north. An area of modified grassland and bramble scrub is also included, to be planted with trees.

Proposals

- 1.4 The proposals are for the erection of a school theatre building and changing rooms to serve adjacent sports facilities, with associated landscaping, planting, and ancillary works.

2.0 Scope of Assessment

1. *Assess the current baseline habitat and linear value of the site*
2. *Assess the likely habitat and linear features retained, removed and enhanced*
3. *Calculate the change in habitat and linear biodiversity value*
4. *Provide recommendations for management to ensure habitats proposed are achieved*

2.1 This appraisal and assessment is deemed to be relevant for a maximum of one year due to the possibility of changes in the habitats on-site and the methodology used to calculate Biodiversity Net Gain. Should the site conditions, methodologies or proposals alter, the ecologist should be consulted to confirm that the assessment is still valid.

3.0 Legislative Background

Legislation and Policy

- 3.1 In England, BNG is mandatory from 12 February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%.
- 3.2 The National Planning Policy Framework (NPPF, 2024) Paragraph 187 states:
- “Planning policies and decisions should contribute to and enhance the natural and local environment by:
- (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - (c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - (e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - (f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 3.3 Further information on how BNG is dealt with in Havant, including what is considered ‘significant’ habitat creation or enhancement can be found at: <https://www.havant.gov.uk/node/8555/biodiversity-net-gain>

4.0 Methodology

Assessment Method

- 4.1 The Biodiversity Net Gain Assessment within this report was carried out by George Sayer (BSc(Hons) PgDip MCIEEM MABorA) in July 2025.

Site Assessments

- 4.2 The site was subject to a site survey on 17th October 2024 conforming to the UK Habitat Classification system v2.01 (UKHab Ltd 2023) and the habitats assessed in accordance with the Natural England Statutory Biodiversity Metric: User Guide (2025). Where required, existing and proposed habitat condition was assessed using the Statutory Biodiversity Metric Condition Assessments (2024). Existing habitats are detailed on the Site Habitat Plan (GS46.Cowplain.SHP.v2). Proposed habitats are detailed on the Site Proposed Habitat Plan (GS46.Cowplain.SPHP.v3). The areas of habitat proposed have been determined through reference to proposal plans produced by JB Architecture in July 2025.
- 4.3 The site was subject to a Preliminary Ecological Appraisal in accordance with current best practice (JNCC, 2010; CIEEM, 2017) to ascertain whether any other ecological constraints, or impacts upon protected species or priority habitats were likely. The results of this are detailed separately within the Ecological Impact Assessment (GS467.Cowplain.EcIA.v2).

Calculations

- 4.4 All calculations were carried out using the current Natural England Statutory Biodiversity Metric, in accordance with the User Guide (updated 5th July 2025), available online: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>.
- 4.5 Calculations were undertaken to the nearest 10 square metres. Linear habitats were measured to the nearest linear metres. A summary of the results is included below; the full metric spreadsheet and condition assessments accompany this report as Excel documents.
- 4.6 Grassland species richness was assessed using 5no. 1sqm quadrats dispersed across the patches of habitat, within which all species were identified and an estimate of abundance of each species made. The update survey was conducted at a suitable season for grassland identification, and given this is mostly well-maintained lawn, this is considered a sufficient level of effort for a small site and ensures that features of ecological interest were not missed.
- 4.7 The site is not part of any strategic wildlife corridor or enhancement network zone. For this reason, all habitats are considered to be of *low strategic significance*.
- 4.8 The site contains no irreplaceable or other priority habitats and no degradation has occurred on-site.

5.0 Summary of Baseline and Proposed Ecological Conditions

Area Habitats

5.1 The existing site is formed of the following habitats:

- 0.1131 ha of urban tree (1 large, 1 very large tree) – moderate condition
- 0.0285 ha of urban tree (7 small trees) – moderate condition
- 0.382 of modified grassland (well-maintained grassland to west) – poor condition
- 0.588 ha of developed land (surfaces)
- 0.048 ha of bramble scrub
- 0.114 of modified grassland (rank grassland to east) – poor condition

5.2 It has been determined that:

- 0.1131 ha of urban tree (1 large, 1 very large tree) would be lost
- 0.0285 ha of urban tree (7 small trees) would be retained
- 0.025 of modified grassland would be retained, and 0.209 ha enhanced to moderate condition
- 0.588 ha of developed land (surfaces) would be retained
- 0.048 ha of bramble scrub would be retained
- 0.114 of modified grassland (rank grassland to east) would be retained

5.3 The proposals would create:

- 0.112 ha of developed land – new building, access road, parking, etc.
- 0.04 ha of mixed scrub shrub planting – moderate condition proposed
- 0.2361 ha of urban trees (58 new trees) – good condition proposed

5.4 The main loss on-site is of a large and very large tree; to offset these losses the mitigation hierarchy has been followed and new on-site tree planting proposed. To achieve the compensation would require these trees to achieve good condition. This would be possible providing:

- At least 70% of planted trees are native
- At least 70% of planted trees are native
- Trees are not subject to regular pruning
- 50% of trees are either mature within 30 years, or
- Ecological niches are present.

- 5.5 To ensure this, careful species planning will be undertaken. Species will include wild cherry, crab apple, silver birch, hawthorn, willow, rowan, alder. Many of these trees are considered 'notable' by the Ancient Tree Forum (<https://ati.woodlandtrust.org.uk/how-to-record/species-guides/>) by 50 years of age. Considering the trees will be several years old at the time of planting, within 30 years it is considered likely that most of these species will be relatively mature (i.e. at a stage whereby they are able to reproduce, producing seeds, fruits, cones etc., and approaching their full height and crown size).
- 5.6 Should this criterion not be achieved by 25 years, the trees shall be subject to a regime to create natural ecological niches. This could be achieved by creating deadwood, etching of cavities into larger limbs, planting of ivy, clematis or honeysuckle at the bases.
- 5.7 Whilst achieving the further species criteria for grassland would in theory achieve good condition, at this time it is possible that damage might increase due to increased footfall. As such, moderate condition is considered a cautious proposal.
- 5.8 The baseline value of the site is 2.32 units. The proposals would result in this increasing to 2.58, a gain of 11.47%. All trading rules are passed.

Hedgerow Habitats

- 5.9 The site contains no hedgerow features.

6.o Management

- 6.1 The proposals involve creation of habitats including mixed scrub in moderate condition, modified grassland in moderate condition, urban trees in good condition. The habitats could be considered significant as they are of moderate distinctiveness; as such, the creation and appropriate management of these habitats should be secured through a Habitat Management and Monitoring Plan. Given the proposals are on a school's own grounds with no off-site elements, and very small areas of new habitat other than trees, these measures need only be secured through condition rather than through a legal mechanism. Financial contributions towards monitoring are not considered necessary at this time.

7.0 Conclusions

- 7.1 The proposals would result in a 11.47% net gain in habitat units with all trading rules being passed.
- 7.2 The proposals involve significant new habitats. Assuming the habitat creation on-site, its management and monitoring are secured by condition, the proposals are confirmed to result in biodiversity gains in accordance with local and national policy and relevant legislation.

8.o References

CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2018) Guidelines for Ecological Impact Assessment, 1st edition. Chartered Institute of Ecology and Environmental Management, Winchester.

Natural England (2025) The Statutory Biodiversity Metric Calculation Tool, Condition Assessments and User Guide. Available Online: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides> (accessed 15th July 2025)

UK Hab Ltd. (2023). The Habitat Classification Version 2.01. Available online