



BIODIVERSITY NET GAIN DESIGN STAGE REPORT

Client: Ayro Property Investments Ltd

Site: Mitford Close, Reading

27.08.2025

Version 002



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Life Span of Survey Data and Report			
Report	This report remains valid for 12 to 18 months from date of issue. The report, conclusions and recommendations are valid for current development plans only. Should this change, the report should be reviewed and, if necessary, further survey work and desk study review undertaken.		
Survey Data	Survey data are valid for 12 to 18 months from the date the survey was undertaken.		

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The information which we have prepared and provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct.

Contents

1. Summary	1
2. Introduction	3
2.1 BNG: Good Practice Principals	3
2.2 Site Details	3
2.3 Site Context.....	4
2.4 Project Background	5
2.5 Proposed Development.....	5
2.6 Aims and Objectives	5
2.7 Survey Limitations and Assumptions	6
3. Relevant Legislation and Planning Policy.....	9
3.1 National Planning Policy	9
3.2 Local Planning Policy	9
4. Methods.....	11
4.1 Baseline Biodiversity Units Calculation	11
4.2 Post-Intervention Biodiversity Units Calculation	11
4.3 Change in Biodiversity Units	11
5. BNG Assessment	12
5.1 Baseline Broad Habitat Biodiversity Units.....	12
5.2 Baseline Watercourse Biodiversity Units	14
5.3 Post-Intervention Biodiversity Units	14
5.4 Baseline Biodiversity Units Calculation	16
5.5 Post-Intervention Biodiversity Units Calculation	18
5.6 Conclusions & Recommendations	19
6. References	25
7. Figures	26
7.1 Figure 1: Results of Field Survey	26
7.2 Figure 2: BNG Baseline Map	27
7.3 Figure 3: Proposed Site Plan	28
7.4 Figure 4: BNG Post-Intervention Map	29
7.5 Figure 5: BNG Retention, Loss/Creation, and Enhancement Plan	30
8. Appendix 1 – BNG	31
8.1 Introduction.....	31
8.2 Legislation and Policy Drivers	31
8.3 Biodiversity Net Gain Principles	32
8.4 Exclusions	33
8.5 Biodiversity Net Gain Processes and Pathways	33
8.6 Measuring Biodiversity Net Gain	33

8.7	Management and Monitoring	34
9.	Appendix 2 – Habitat Condition Assessments	36
9.1	Habitats	36
9.2	Watercourses	39
10.	Appendix 3 – Species Lists	40

List of Tables:

Table 1. Site Details	3
Table 2. Site Context.....	4
Table 3. Baseline Biodiversity Units.....	16
Table 4. Biodiversity Units for Created Habitats	18

1. Summary

Site Details
- Site Address: Mitford Close, Land lying to the East Side of Whitley Wood Road, Shinfield, Reading, RG2 8JQ. - OS grid reference: SU 7292 6962. - Approximate Area of Site: 949.15 m² (0.09 ha).
Scope of Works
- aLyne Ecology Ltd was commissioned by Ayro Property Investments Ltd to undertake a Biodiversity Net Gain (BNG) Assessment, based on the Statutory Biodiversity Metric (DEFRA, 2024). This included the area within the Planning Application Boundary (hereafter referred to as 'on-site') (see Figure 1). - The baseline biodiversity units for on-site habitats have been based on the Preliminary Ecological Appraisal (PEA) carried out by aLyne Ecology Ltd in 2025 (see Figure 2) (aLyne Ecology, 2025). - Post-intervention biodiversity units have been based on the Proposed Block Plan (see Figure 3) (Laura Nica Studios, 2024) and are displayed in map form in Figure 4. - A biodiversity retention, loss/creation and enhancement plan are provided in Figure 5.
Development Proposals & Impacts
As shown in the Proposed Block Plan (Figure 3) and BNG Post-Intervention Map (see Figure 4), the development proposals are for the following: The construction of six new two-storey dwellings, with associated car parking, bicycle and refuse storage with adjoining landscaping including gardens and road verges.
Biodiversity Net Gain Assessment
Habitats - On-site, the loss of other woodland broadleaved, bramble scrub and modified grassland and the creation of unvegetated garden, vegetated garden and developed land; sealed surface will result in a biodiversity net loss of -93.25% (- 0.61 units). - Therefore, a biodiversity net gain for broad habitats and compliance with trading rules (i.e., habitats proposed should be like-for-like or better) cannot not achieved. Watercourses - On-site, the loss of ditches will result in a biodiversity net loss of -100% (-0.02 units). - Therefore, a biodiversity net gain for watercourses and compliance with trading rules (i.e., habitats proposed should be like-for-like or better) cannot be achieved. The site does not contain irreplaceable habitats (i.e., ancient woodland and veteran trees) and there are no Priority Habitats on site.

The hedgerow modules were not triggered for this project as they are absent from the site.

Recommendations & Conclusions

Mitigation Hierarchy

- The off-site adjacent deciduous woodland and woodpasture-parkland Priority Habitat should be retained and protected both during construction and following completion of development. A Construction and Environmental Management Plan (CEMP) should be prepared, detailing how off-site Priority Habitats will be protected during construction operations.
- An Ecological Clerk of Works (ECoW) should be present on site during any site clearance activities, which are likely to involve the removal of any vegetation. Any stag beetles, or hedgehogs found, should be moved away into adjacent habitats unharmed.
- Trees and scrub should be retained and protected, where possible.
- The removal of the discarded materials piles should be carried out carefully by hand, to ensure that any reptiles, which may be present, can escape unharmed.
- Any removal of vegetation should be undertaken outside of the bird breeding season (March to August inclusive) to avoid destruction/disturbance of nesting birds.
- A sensitive lighting plan should be adopted, to ensure that outside lighting does not adversely affect adjacent habitats and wildlife, particularly bats when foraging and commuting.
- A fingertip search of the any vegetation, as well as the removal of the discarded materials piles within the site should be carried out by a great crested newt licenced ecologist prior to works taking place. If any great crested newts are found, all works must cease immediately, and a European Protected Species Licence (EPSL) should be obtained from Natural England.
- A Precautionary Method Statement for hazel dormice should be produced to enable clearance of the bramble scrub be undertaken under a precautionary approach which should include (but not limited to): A pre-works inspection of the bramble scrub by a licensed ECoW, details of toolbox talks and a method statement for vegetation clearance.

Further Ecological Enhancements

- The further ecological enhancements for the site recommended in aLyne Ecology's Preliminary Ecological Appraisal & Ground Level Tree Assessment report (aLyne Ecology, 2025) should be implemented, where possible.

BNG Assessment

- In order to achieve biodiversity net gain, off-site compensation will be required via the purchase of off-site units or credits for both area and linear habitat types. The LPA or an off-site provider should be contacted to discuss opportunities for off-site units and/or biodiversity tariffs.

2. Introduction

2.1 BNG: Good Practice Principals

BNG has been defined as ‘*development that leaves biodiversity in a better state than before, and an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation*’ (DEFRA, 2024).

The system of biodiversity units used to measure biodiversity before and after site development is a quantitative assessment, demonstrating the change in biodiversity in a robust, consistent, and transparent way.

BNG, Good Practice Principles for Development (Baker, Hoskin, & Butterworth, 2019) sets out the principles for achieving net gain. Key principles include:

- Apply the ‘Mitigation Hierarchy’ (in line with CIEEM Guidelines for Ecological Impact Assessment (EcIA) (CIEEM, 2019) and be ‘additional’ by achieving outcomes that exceed existing obligations.
- Avoid losing biodiversity which cannot be off set elsewhere (e.g., irreplaceable habitats).
- Address risk (e.g., difficulty of achieving habitat creation / enhancement for net gain).
- Make a ‘measurable’ net gain contribution (e.g., calculated using an appropriate metric) and ensure that calculations consistent and transparent (i.e., limitations and assumptions are clearly identified).
- Ensure that net gain design achieves the best outcome for biodiversity (this may require both quantitative and qualitative assessment) and create a net gain legacy for long-term benefits.

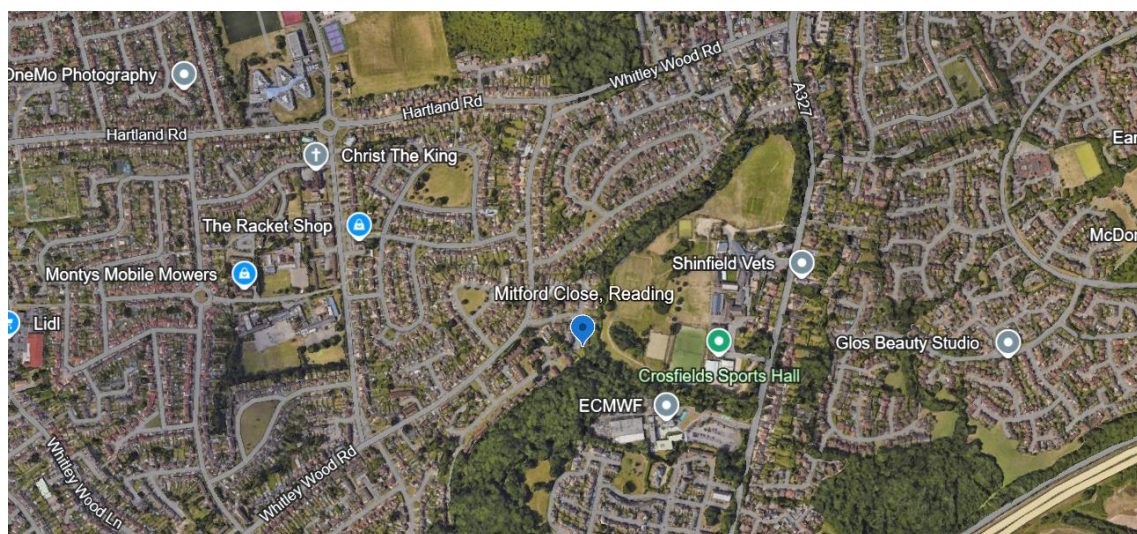
2.2 Site Details

Table 1 provides details of the site, intended as a summary of key features, as provided in aLyne Ecology’s Preliminary Ecological Appraisal and Ground Level Tree Assessment report (Laura Nica Studios, 2024).

Table 1. Site Details

Site Name	Mitford Close, Reading
Site Address	Mitford Close, Land lying to the East Side of Whitley Wood Road, Shinfield, Reading, RG2 8JQ
OS Grid Reference	SU 7292 6962
Approximate Total Area of Site	0.09 ha (949.15 m ²)
Landowner and Local Authority	Ayro Property Investments Ltd, Wokingham Borough Council
Geology and Soils	Loamy soils with naturally high groundwater
Hydrology	Naturally wet
Nature Conservation Designations	None
Other Designations	None on site
The Woodland Trust Ancient and Notable Tree Inventory	None on site
Biodiversity Opportunity Area	None on site
National Habitat Network	Network Enhancement Zone 2 includes land within close proximity to the existing habitat components that are more likely to be suitable for habitat re-creation for the particular habitat (Natural England, 2020).
Current Land Use	Modified grassland verges, areas of woodland and bramble scrub in the southern end of the Mitford Close residential area

An aerial plan showing the location of the site is provided below.



Site Location (© Google Earth Pro, accessed 14th March 2025).

2.3 Site Context

Table 2 provides details on the context of the site in terms of habitats, land use and connectivity to the wider landscape.

Table 2. Site Context

Surrounding Habitats and Land Use	Suburban location comprising mostly residential dwellings with adjoining gardens and roads. Large playing fields associated with local schools are situated close by. The closest being approximately 450 m to the east. The wider landscape is characterised by residential areas with scattered trees and gardens.
Urban Context / Locality	The site is located on Mitford Close, off Whitley Wood Road in the suburbs of Reading. Central Reading is located approximately 4km north and Wokingham is located 8km 712 m to the southeast of the site.
Connectivity to Wider Landscape	The site had good connectivity areas of key foraging habitat for bats, as it borders deciduous woodland, wood pasture and parkland Priority Habitats to the south. This is directly linked to multiple areas of ancient woodland.
Priority Habitats within 1 km	• Deciduous woodland. • Ponds. • Woodpasture & parkland. • Traditional orchards.
Ancient Woodland within 1 km	The site is not located within an area of ancient woodland or plantation on ancient woodland. However, there are six parcels of ancient and semi-natural woodland within 1 km of the site. The closest is located approximately 48 m to the southwest of the survey area, associated with Nores Hill.
Non-Statutory Designated Sites within 1 km	None
Statutory Designated Sites within 1 km	• Pearman's Copse Local Nature Reserve (LNR) is located approximately 514 m to the south-east of the site.
European Designated Sites within 5 km	None
EPSLs within 2 km	Eleven granted EPSLs in total for roosting bats:

	• Destruction of a resting place for common pipistrelle (<i>Pipistrellus pipistrellus</i>) bats, located approximately 669 m to the southeast. • Destruction of a breeding site and resting place for common pipistrelle bats, located approximately 1 km to the southeast. • Destruction of a resting place for common pipistrelle and soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) bats, located approximately 1.3 km to the south. • Five licences for the destruction of a resting place for common pipistrelle, soprano pipistrelle and brown long-eared (<i>Plecotus auritus</i>) bats, located approximately 1.3 km to the southeast. • Destruction of a resting place for common pipistrelle and brown long-eared bats, located approximately 1.4 km to the south. • Two licences for the destruction of a resting place for common pipistrelle and brown long-eared bats, located approximately 1.7 km to the southwest. The following EPSLs for amphibians, were recorded within 2 km of the site: • Destruction of a resting place for great crested newts (<i>Triturus cristatus</i>), located approximately 1.3 km to the northeast.
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2.4 Project Background

Full details on ecological surveys carried out at the site are provided in the following reports produced by aLyne Ecology:

- aLyne Ecology's Preliminary Ecological Appraisal and Ground Level Tree Assessment Report (aLyne Ecology, 2025).

2.5 Proposed Development

As shown in the Proposed Block Plan by Laura Nica Studios (Laura Nica Studios, 2024) (Figure 3) and BNG Post-Intervention Map (see Figure 4), the development proposals are for the following:

The construction of six new two-storey dwellings, with associated car parking, bicycle and refuse storage with adjoining landscaping including gardens and road verges.

The development will result in the loss or partial loss of the following habitats:

- Modified grassland.
- Bramble scrub.
- Other woodland; broadleaved.
- Ditches.
- Developed land; sealed surface.
- Individual trees.

2.6 Aims and Objectives

The objectives of this BNG Assessment are as follows:

- Establish the baseline biodiversity units for the site, classifying the type, distinctiveness, condition, and strategic significance of habitats and watercourses present prior to development. The baseline biodiversity units have been based on the Preliminary Ecological Appraisal (PEA) carried out by aLyne Ecology Ltd. in 2025 (see Figure 2) (aLyne Ecology, 2025).
- Establish the post-intervention biodiversity units for the proposed scheme, based on the habitats and watercourses to be retained, enhanced, and created as detailed in the Proposed

Block Plan (Figure 3) (Laura Nica Studios, 2024) and BNG Post-Intervention Map (see Figure 4).

- Determine whether the proposed scheme will result in a net loss or net gain for biodiversity (habitats and watercourses).
- Make recommendations for maximising net gain, in accordance with the NPPF, 2024 (HM Government, 2024) Wokingham Borough Local Development Framework: Adopted Core Strategy Development Plan Document (Wokingham Borough Council, 2010) and Wokingham Borough Council – Managing Development Delivery Local Plan (Adopted February 2014) (Wokingham Borough Council, 2014).
- Clearly identify limitations and assumptions.

The Statutory Biodiversity Metric (DEFRA, 2024) has been used to calculate biodiversity units before and after development.

2.7 Survey Limitations and Assumptions

2.7.1 Survey Limitations

The field survey (UK Habitat Classification) was carried out on 17th March 2025, which is within 12 months of preparing this assessment. Therefore, the use of this data is concluded to be appropriate, in accordance with current guidelines set out by CIEEM concerning the lifespan of ecological data.

The site was visited over the period of one day, as such seasonal variations cannot be observed and only a selection of all species that potentially occur within the site have been noted. Therefore, the survey provides a general assessment of potential nature conservation value.

There were no limitations to the field survey in terms of the following:

- The site could be fully accessed.
- Weather conditions (dry and sunny).
- Personal competence (qualifications, training, skills, and experience).
- Time spent surveying.

2.7.2 BNG Assumptions

The following sections provide information on assumptions and rules relating to the Statutory Biodiversity Metric (DEFRA, 2024) as detailed in the most up to date user guide documentation (DEFRA, 2024).

Biodiversity Gain Hierarchy

There are three ways in which a project can deliver BNG.

1. In the first instance, biodiversity units should be delivered on-site (within the red line boundary of a development site) where possible.
2. If all of a project's unit deficit cannot be delivered on-site, they can be delivered through a mixture of on-site and off-site units or solely off-site. Off-site biodiversity gains can be made by the client outside of their red line boundary but within their land ownership. Alternatively, off-site biodiversity units can be bought on a range of BNG markets.
3. If BNG cannot be achieved on-site or off-site, statutory biodiversity credits can be purchased from the government as a last resort. The government will use the revenue to invest in habitat creation in England.

All three options can be combined but must follow the steps in order. This order of steps is called the biodiversity gain hierarchy.

Appropriate Targets

The classification of created and enhanced habitat, hedgerow and watercourse types (where present) have been selected based on those most closely matching the habitats outlined in the Proposed Site Plan (Figure 3).

Appropriate targets have been set when assigning the post-intervention habitat types and conditions (created and enhanced) in line with the metric rules and principles. This means they are considered to be achievable and viable for the context of the site, taking into account the current and proposed land uses, time taken to reach target condition and environmental factors.

Supplementary Planning Documents (SPD's) & Local Nature Recovery Strategies (LNRS's)

Where available, local planning authority SPD's and/or LNRS's will be used to inform the selection of habitat, hedgerow and watercourse types to be retained, created or enhanced.

Irreplaceable Habitats

Impacts to on-site or off-site irreplaceable habitats (i.e. ancient woodland and veteran trees) should be avoided in line with planning policy. Impacts to these habitats cannot be calculated by the metric as they are deemed too difficult to recreate once destroyed or degraded. Bespoke compensation must be agreed for any losses or impacts to these habitats.

Where irreplaceable habitats are present but are not being impacted by the development proposals, enhancement of these habitats can contribute to the generation of post-intervention biodiversity units.

Habitat Clearance/Degradation

If evidence that habitat clearance or degradation has taken place to reduce the pre-development biodiversity value of the site prior to aLyne Ecology's involvement in the project, then the pre-degradation habitat type/condition will be used for the baseline. If a baseline date cannot be agreed, then the habitats present on 30th January 2020 will be selected as default (this is the day the Environment Bill entered parliament). A combination of historic data records, satellite imagery and field surveys (where available) will be used to help classify the type/condition of cleared habitats and a precautionary approach will be taken.

Private Gardens

For the purposes of BNG, a private garden is defined as any garden within the curtilage of a privately owned or tenanted dwelling house. The biodiversity value of private gardens should not be undervalued and therefore individual habitat parcels should be mapped where appropriate. This might include:

- Higher distinctiveness grassland habitats.
- Woodland.
- Dense scrub.
- Individual trees (medium, large and very large sized trees only).
- Hedgerows.
- Ponds.

However, as any created or enhanced habitats cannot be legally secured for 30 years post-development, all proposed habitats must be entered into the metric as either:

- Urban – vegetated garden; or

- Urban – unvegetated garden.

Any other habitats that are created or enhanced within the curtilage of a proposed dwelling cannot contribute towards BNG, including individual planted trees and hedgerows. However, any habitats within a private garden that are not proposed to be lost or impacted by the proposals can be recorded as retained.

Individual Trees

The tree helper located within the Statutory Biodiversity Metric (DEFRA, 2024) has been used to calculate the area of all individual trees on site. Tree helper values are a representation of canopy biomass, and are based on the root protection area formula, derived from BS 5837:2012 (BSI, 2012).

The following rules apply to individual trees:

Baseline:

- The area of the tree canopy as well as the area of habitat beneath it are included in BNG calculations.
- Only medium, large and very large sized trees should be recorded within private gardens at baseline.
- Trees within overgrown, non-native hedges (e.g. Leylandii) should be classified as non-native and ornamental hedgerows.
- Linear formations of trees within the urban environment should not be recorded as lines of trees in the hedgerow module, but as individual trees.

Post-Intervention:

- Any trees planted within private gardens cannot count towards BNG.
- Any trees planted as part of hedgerow creation and/or enhancement cannot count towards BNG.
- Natural size increases of retained and planted trees cannot count towards BNG.
- All proposed trees should be input as 'small', unless 'medium' sized at the time of planting.

3. Relevant Legislation and Planning Policy

3.1 National Planning Policy

3.1.1 Environment Act 2021

Under The Environment Act 2021 (HM Government, 2021), all granted planning applications in England will be required to deliver at least a 10% biodiversity net gain. This policy became mandatory as of February 2024.

3.1.2 National Planning Policy Framework (2024)

The NPPF, 2024 (HM Government, 2024) sets out policies for, *inter alia*, biodiversity and geological conservation directing that schemes should seek to protect and enhance, where possible, designated, and non-designated nature conservation sites and features.

Chapter 15 (Conserving and enhancing the natural environment), Paragraph 187 (d) states: “*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.*”

Paragraph 192(b) states: “*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.*”

3.2 Local Planning Policy

3.2.1 Wokingham Borough Local Development Framework, Adopted January 2010

CP7: Biodiversity

“Sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance.

Development:

A) Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly, or

B) Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly or;

C) That compromises the implementation of the national, regional, county and local biodiversity action plans will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and:

- i) Mitigation measures can be put in place to prevent damaging impacts; or*
- ii) Appropriate compensation measures to offset the scale and kind of losses are provided”*

3.2.2 Wokingham Borough Managing Development Delivery Local Plan, Adopted February 2014.

Policy TB23: Biodiversity and Development

“1. Sites of national or international importance are shown and sites of local importance is defined on the Policies Map.

2. Planning permission for development proposals will only be granted were they comply with policy CP7 – Biodiversity of the Core Strategy and also demonstrate how they:

a) Provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing.

b) Provide appropriate buffer zones between development proposals and designated sites as well as habitats and species of principle importance for nature conservation.

c) Ensure that all existing and new developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors, which shall be integrated and linked to the wider green infrastructure network”

4. Methods

The following industry recognised best practice methods have been followed:

- The Statutory Metric User Guide, updated July 2024 (DEFRA, 2024).
- Biodiversity Net Gain. Good Practice Principles for Development. A Practical Guide (Baker, Hoskin, & Butterworth, 2019).
- Biodiversity Net Gain Report & Audit Templates (CIEEM, 2021)
- BS42020 – Biodiversity Code of Practice for Planning and Development (BSI, 2013).
- BS8683 – Process for designing and implementing Biodiversity Net Gain – Specification (BSI, 2021).

Wokingham Borough Local Development Framework, Adopted January 2010 and Wokingham Borough Managing Development Delivery Local Plan, Adopted February 2014 have been taken into account.

4.1 Baseline Biodiversity Units Calculation

The extent of habitat loss, retention, creation and enhancement has been calculated using the Statutory Biodiversity Metric (DEFRA, 2024). All habitat mapping has been conducted using QGIS 3.34.4 'Pirzen' and the Natural England QGIS Template.

The habitat condition assessments and baseline biodiversity units for all on-site habitats, hedgerows and watercourses (where appropriate) have been based on data collected during the original field survey and PEA carried out by aLyne Ecology on 17th March 2025 (see Figure 1 and Figure 2).

The habitat condition assessments for each habitat parcel are provided in Appendix 2. Specific habitat parcel reference codes have been included in brackets throughout Section 5.1, which correspond to those displayed in Figure 2. A species list for each parcel habitat has been provided in Appendix 3.

The site does not contain irreplaceable habitats (i.e., ancient woodland and veteran trees) and there are no Priority Habitats on site.

The hedgerow module was not triggered for this project as they are absent from the site. A 'ditch' in the watercourse module has been assessed according to the Statutory Metric Habitat Condition Assessment (DEFRA, 2024).

Strategic significance has been set at 'medium' for all habitats and watercourses within the boundary of the site. This is because they as they fall within Network Enhancement Zone 2 as outlined in the National Habitat Network Maps User Guidance V.2. document (Natural England, 2020).

4.2 Post-Intervention Biodiversity Units Calculation

The calculation of post-intervention biodiversity units has been based on the Proposed Block Plan (see Figure 3) (Laura Nica Studios, 2024) and are displayed in map form in Figure 4.

4.3 Change in Biodiversity Units

The change in biodiversity units is calculated by subtracting the baseline biodiversity units from post-intervention biodiversity units. A 10% net gain in biodiversity units for habitats, hedgerows and watercourses (where present) are required for the project to achieve biodiversity net gain. A biodiversity retention, loss/creation, and enhancement plan is provided in Figure 5.

5. BNG Assessment

The habitat distinctiveness for each habitat and watercourse is auto populated in the Statutory Biodiversity Metric (DEFRA, 2024). The following sections provide information on how the habitat condition and the strategic significance have been scored.

Further information on scoring habitat distinctiveness, habitat condition, and strategic significance is provided in Appendix 1. The habitat condition assessments for each habitat parcel are provided in Appendix 2. Specific habitat parcel reference codes have been included in brackets throughout Section 5.1, which correspond to those displayed in Figure 2.

5.1 Baseline Broad Habitat Biodiversity Units

The on-site biodiversity baseline habitats are presented in map form in Figure 2 and the calculation of baseline biodiversity units includes all habitats on site, recorded as follows:

Habitats:

- Modified Grassland – 0.0329 ha.
- Other Woodland; Broadleaved – 0.0188 ha.
- Bramble Scrub – 0.019 ha.
- Developed Land; Sealed Surface – 0.038 ha.
- Individual Trees (Urban Trees) – 0.0489 ha.

5.1.1 Modified Grassland

The grassland within this habitat parcel has been classified as modified grassland because it comprises species-poor vegetation (<9 species per square metre), dominated by fast-growing grasses on fertile, neutral soils and does not meet the definitions of acid grassland, calcareous grassland or neutral grasslands.

HCA (Section 9.1.1)

The parcel (MG1) of modified grassland has been set as 'Poor' condition. This is because the grassland passes only three of the seven condition criteria and fails essential criteria A, which states that the habitat must comprise at least 6-8 species per square metre (including at least two forbs).

Strategic Significance

The strategic significance for the habitat was set as 'medium' i.e., 'Location ecologically desirable but not in local strategy'. This is because the habitat is not designated within the local strategy but provides an ecologically beneficial stepping-stone from habitats on site to habitats located in the wider landscape.

5.1.2 Other Woodland; Broadleaved

Other woodland; broadleaved habitat on site comprises woodland parcels classified as 'other broadleaved woodland types' in UKHab. This is because they include a mixture of broadleaved species but fail to meet the criteria of w1a-f of the UKHab classification system.

HCA (Section 9.1.2)

The condition for the parcels OWB1 & OWB2 of other woodland; broadleaved has been set as 'Poor'. This is mainly a result of a two age classes being present with limited numbers of native species present, lack of NVC plant community, signs of nutrient enrichment/damaged ground, as well as the absence of veteran trees and standing/fallen deadwood.

Strategic Significance

The strategic significance for the habitat was set as 'medium' i.e., 'Location ecologically desirable but not in local strategy'. This is because the habitat is not designated within the local strategy but provides an ecologically beneficial stepping-stone from habitats on site to habitats located in the wider landscape.

5.1.3 Bramble Scrub

The areas of dense scrub dominated by bramble have been classified as bramble scrub.

HCA

The condition for the parcels BS1 and BS2 of bramble scrub is auto populated as 'Condition Assessment N/A' in the Statutory Biodiversity Metric.

Strategic Significance

The strategic significance for the habitat was set as 'medium' i.e., 'Location ecologically desirable but not in local strategy'. This is because the habitat is not designated within the local strategy but provides an ecologically beneficial stepping-stone from habitats on site to habitats located in the wider landscape.

5.1.4 Developed Land; Sealed Surface

In the UKHab classification system, developed land; sealed surface includes habitats classified to Level 4 and Level 5 of the UKHab classification system. These include developed land; sealed surface (Level 4), buildings (Level 5) and other developed land (Level 5).

Therefore, developed land; sealed surface habitat comprises all hard standing on site including road and pavement. As they are sealed by impervious materials.

HCA

Habitat condition for developed land; sealed surface is auto populated as 'N/A - Other' in the Statutory Biodiversity Metric.

Strategic Significance

The strategic significance for the habitat was set as 'medium' i.e., 'Location ecologically desirable but not in local strategy'. This is because the habitat is not designated within the local strategy but provides an ecologically beneficial stepping-stone from habitats on site to habitats located in the wider landscape.

5.1.5 Individual Trees (Urban Trees)

All individual trees on site have been classified as 'urban' trees rather than 'rural' trees as they occur within the urban environment on Mitford Close, comprising trees which are located within close proximity to hard standing surfaces.

HCA (Section 9.1.3)

Tree T1 was assessed as 'moderate' condition as it passed four of the six habitat condition assessment criteria for individual trees.

Tree T2 was assessed as 'moderate' condition as it passed four of the six habitat condition assessment criteria.

Tree T3 was assessed as 'moderate' condition as it passed four of the six habitat condition assessment criteria for individual trees.

Tree T4 was assessed as 'moderate' condition as it passed three of the six habitat condition assessment criteria for individual trees.

Tree T5 was assessed as 'poor' condition as it passed two of the six habitat condition assessment criteria for individual trees.

Tree T6 was assessed as 'moderate' condition as it passed four of the six habitat condition assessment criteria for individual trees.

Strategic Significance

The strategic significance for the habitat was set as 'medium' i.e., 'Location ecologically desirable but not in local strategy'. This is because the habitat is not designated within the local strategy but provides an ecologically beneficial stepping-stone from habitats on site to habitats located in the wider landscape.

5.2 Baseline Watercourse Biodiversity Units

The on-site biodiversity baseline watercourses are presented in map form in Figure 2 and the calculation of baseline biodiversity units includes all watercourses on site, recorded as follows:

Watercourses:

- Ditches – 0.011 km.

5.2.1 Ditches

A dry ditch has been recorded on-site according to secondary code 50 of the UKHab methodology. The feature is defined as ditch as it comprises a linear feature that is less than 5 m wide and that is more than 20 times longer than its width.

HCA (Section 9.2.1)

The condition for the ditch habitat on site has been set as 'Poor' as it passes three of the eight condition assessment criteria. As the ditch is dry and situated within the other woodland broadleaved which heavily shaded with no water present and no aquatic marginal vegetation along more than 75% of the ditch, the condition.

Strategic Significance

The strategic significance for the habitat was set as 'medium' i.e., 'Location ecologically desirable but not in local strategy'. This is because the habitat is not designated within the local strategy but provides an ecologically beneficial stepping-stone from habitats on site to habitats located in the wider landscape.

5.3 Post-Intervention Biodiversity Units

5.3.1 Habitat Creation

The following sections provide information on how the habitat condition and the strategic significance have been scored for habitats to be created on site. The habitat distinctiveness for each habitat is auto-populated in the Statutory Biodiversity Metric (DEFRA, 2024).

Unvegetated Garden

All permeable hardstanding areas within the curtilage of proposed private property have been classified as unvegetated garden. This would total 0.0078 ha.

The habitat distinctiveness is auto populated by the Biodiversity Metric as 'very low' distinctiveness. The habitat condition is auto populated by the Biodiversity Metric as 'N/A'.

The strategic significance for unvegetated garden was set as low i.e., 'Area/compensation not in local strategy/no local strategy'. This is because the habitat is not designated within the local strategy and is not in an ecologically desirable location.

Vegetated Garden

All garden areas within the curtilage of a proposed private property have been classified as vegetated garden. This would total 0.0207 ha.

The habitat distinctiveness is auto populated by the Biodiversity Metric as 'low' distinctiveness. The habitat condition is auto populated by the Biodiversity Metric as 'N/A'.

The strategic significance for vegetated garden was set as low i.e., 'Area/compensation not in local strategy/no local strategy'. This is because the habitat is not designated within the local strategy and is not in an ecologically desirable location.

Developed Land; Sealed Surface

Buildings and Hardstanding

The construction of the proposed new buildings, parking and pavement areas has been classified as developed land; sealed surface because the soil surface will be sealed with impervious materials. This would total 0.076 ha.

The habitat distinctiveness is auto populated by the Biodiversity Metric as 'very low' distinctiveness. The habitat condition is auto populated by the Biodiversity Metric as 'N/A'.

The strategic significance for the habitat was set as 'medium' i.e., 'Location ecologically desirable but not in local strategy'. This is because the habitat is not designated within the local strategy but provides an ecologically beneficial stepping-stone from habitats on site to habitats located in the wider landscape.

5.4 Baseline Biodiversity Units Calculation

Table 3 below provides the baseline biodiversity units for the site.

Table 3. Baseline Biodiversity Units

Site Habitat Baseline	Area (ha)	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Suggested Action to Address Habitat Losses	Baseline Biodiversity Units	Area Retained	Area Enhanced	Baseline Units Retained	Baseline Units Enhanced	Area Lost	Units Lost
Modified Grassland	0.0329	Low	Poor	Medium	Same distinctiveness or better habitat required	0.07	0	0	0	0	0.03	0.07
Other Woodland; Broadleaved	0.0188	Medium	Poor	Medium	Same broad habitat or a higher distinctiveness habitat required	0.08	0	0	0	0	0.02	0.08
Bramble Scrub	0.019	Medium	N/A	Medium	Same broad habitat or a higher distinctiveness habitat required	0.08	0	0	0	0	0.02	0.08
Developed Land; Sealed Surface	0.038	Very low	N/A	Low	Compensation Not Required	0.00	0	0	0	0	0.03	0.0
Individual Trees (Urban Trees)	0.0448	Medium	Moderate	Medium	Same broad habitat or a higher distinctiveness habitat required	0.39	0	0	0	0	0.04	0.39
Individual Trees (Urban Trees)	0.0041	Medium	Poor	Medium	Same broad habitat or a higher distinctiveness habitat required	0.02	0	0	0	0	0.00	0.02
Total Habitat Baseline Units	0.15 ha					0.65	0	0	0	0	0.15	0.65

Site Watercourse Baseline	Length (km)	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Suggested Action to Address Habitat Losses	Baseline Biodiversity Units	Length Retained	Length Enhanced	Biodiversity Units Retained	Units Enhanced	Length Lost	Units Lost
Ditches	0.11 km	Medium	Poor	Medium	Same habitat required	0.02	0	0	0	0	0.01	0.00
Total Watercourse Baseline Units	0.01 km					0.02	0.00	0.00	0.00	0.00	0.01	0.00

5.5 Post-Intervention Biodiversity Units Calculation

Table 4 below provides the post-intervention biodiversity units for created habitats on site.

Table 4. Biodiversity Units for Created Habitats

Proposed Habitat	Area (ha)	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Habitat Units Delivered
Unvegetated Garden	0.0078 ha	V.Low	N/A - Other	Location ecologically desirable but not in local strategy	0.00
Vegetated Garden	0.0207 ha	Low	Condition Assessment N/A	Location ecologically desirable but not in local strategy	0.04
Developed land; sealed surface	0.076 ha	V.Low	N/A -Other	Location ecologically desirable but not in local strategy	0.00
Total Habitat Post-Intervention Units					0.04

5.6 Conclusions & Recommendations

5.6.1 Mitigation Hierarchy

Priority Habitats and Ancient Woodland

The proposed development should comply with legislation relevant to reducing the impacts of construction, namely the Control of Pollution Act, 1974, the Environmental Protection Act, 1990, The Clean Air Act 1993, The Environment Act, 1995 and the Pollution Prevention and Control Act, 1999 and conform to British Standards on noise and vibration (BS 5228-2009. Code of Practice for Noise and Vibration Control on Construction and Open Sites).

The following avoidance and mitigation measures relating to off-site adjacent Priority Habitats and ancient woodlands are recommended:

- Materials should not be stored in or near off-site woodlands, ancient woodlands and trees.
- Construction activities should be confined to the site and not encroach into off-site woodland or Priority Habitats and ancient woodlands
- Nesting bird habitat should be retained and protected and any removal of vegetation on site should be carried out outside the bird nesting period, as detailed in Section 0.
- An ECoW should be present on site during any site clearance activities, which are likely to involve the removal/disturbance of any vegetation. **In the unlikely event hazel dormice are found works will cease immediately and Natural England will be contacted to seek advice on how works can proceed lawfully.**
- A sensitive lighting plan should be adopted, to ensure that outside lighting does not adversely affect adjacent habitats and wildlife, particularly bats when foraging and commuting.

It is recommended a CEMP (Biodiversity), enforced via an appropriate planning condition, is prepared for the site. The CEMP (Biodiversity) should include the following:

- A map showing the locations of all ecological features.
- A risk assessment of the potentially damaging construction activities.
- Practical measures to avoid and reduce impacts during construction.
- Location and timing of works to avoid harm to biodiversity features, namely the parcels of woodland.
- Precautionary measures relating to protected species including, stag beetles, common toads, reptiles, great crested newts, nesting birds, roosting/foraging/commuting bats, hazel dormice, badgers, and hedgehogs.
- Responsible persons and lines of communications.
- Use of protective fences, exclusion barriers, and warning signs.

It is also recommended a BPES, enforced via an appropriate planning condition, is prepared, detailing how the Priority Habitats off-site, will be protected post-construction and how the enhancements will be implemented and managed in the long term.

Providing the recommendations given above are adhered to, Priority Habitats and ancient woodlands should not be adversely impacted upon by the development proposals.

Trees

Native trees should be retained, where possible and any trees lost as a result of the proposed development, should be replaced with equivalent numbers of native species.

To prevent damage to retained trees during development, a buffer zone should be put in place to protect the rooting area (Root Protection Area, which is calculated in accordance with British Standard 5837, 'Trees in Relation to Construction'), in which no construction activities should be permitted.

Great Crested Newts

As a precautionary approach to ensure great crested newts are not harmed during the proposed works, it is recommended that a fingertip search of the works area is carried out by a great crested newt licenced ecologist immediately prior to the commencement of the works, to search for great crested newts. This can be conducted at the same time as measures implemented for hazel dormice. An ECoW should be present on site during any site clearance activities, which are likely to involve the removal of any vegetation, as well as the removal of the discarded materials.

In the unlikely event that a great crested newt is found during the search, works would need to cease immediately and an EPSL for great crested newts should be obtained from Natural England before works continue.

Common Toads, Reptiles and Hedgehogs

An ECoW should be present on site during any site clearance activities, which are likely to involve the removal/disturbance of any vegetation, particularly the bramble scrub, woodland and discarded material piles. Any common toads, reptiles or hedgehogs found, should be allowed to move away into adjacent habitats unharmed, of their own accord.

Nesting Birds

Nesting bird habitat within the trees and scrub on site should be retained, where possible. However, if works which are likely to damage bird nests need to be carried out during the nesting period, there is potential that nesting birds could be harmed and disturbed. To ensure legal compliance, a check should be undertaken by an ecologist within 48 hours of works commencing, to confirm the presence/absence of nest sites. If nests sites are identified, works to that feature should be delayed until the nest site becomes inactive (species specific, but approximately 4-6 weeks maximum).

Bats

Recommendations to minimise the potential impacts of artificial external lighting on bat activity, are provided below (Bat Conservation Trust, 2023):

- Avoid prolonged use of outside lighting during the period dusk to dawn, particularly during the bat active season (April to October).
- Security lighting should be on a motion sensor and short duration timer (1 minute).
- Lighting that is required for security or safety reasons, should use a lamp of no greater than 2000 lumens (150 Watts) and should comprise sensor activated lamps.
- Red light bulbs should be used, where possible.
- LED luminaires with a warm white spectrum (<2700 Kelvin) are the preferred option and should be used where possible. Luminaires should feature peak wavelengths higher than

550 nm to minimise disturbance to bats. All luminaires should lack UV elements, metal halide and fluorescent sources should not be used.

- Lighting should be directed to where it is needed with minimal light spillage. This can be achieved by limiting the height of the lighting columns and by using as steep a downward angle as possible and/or a specialist bollard that directs the light below the horizontal plane (<90°).
- Internal luminaires should be recessed where installed in proximity to windows to reduce glare and light spill.
- Waymarking inground markers with a low output and with cowls should be used to delineate path edges.
- Artificial lighting should not directly illuminate any potential bat roosting features or habitats of value to foraging bats, i.e., woodlands.

Badger

any holes/trenches created as part of the construction works, should be closed at night or a mammal ladder provided to enable mammals a means of escape.

Hazel Dormouse

It has been concluded that the parcel of bramble scrub and on-site woodland could support hazel dormouse as there is interconnected understory connected to adjacent off-site woodland, Priority Habitats and ancient woodland. Given the small size of the bramble scrub to be affected (0.019 ha) and on-site woodland (0.0188 ha), it would be disproportionate and impractical to survey for presence/absence of hazel dormice. Therefore, a Precautionary Method Statement for hazel dormice should be produced to enable clearance of the bramble scrub and woodland be undertaken under a precautionary approach.

The requirements of the Precautionary Method Statement are as follows:

- A pre-works inspection of the bramble scrub and woodland by a licensed ECoW by hand searching for field signs for dormice including feeding remains or nests at least 24 hours before vegetation clearance. Harm and/or injury to hazel dormice must be avoided.
- A toolbox talk will be given by the licensed ecologist to all contractors working on site, following the pre works inspection. A paper copy of the toolbox talk and this Precautionary Working Method Statement will be provided to contractors and kept on site for the duration of the works. All contractors will sign the toolbox register, to confirm they have read and understand the toolbox talk. Any contractors not present at the toolbox talk will need to sign the toolbox register, to confirm they have read and understand the toolbox talk and Precautionary Working Method Statement.
- Vegetation clearance works of the bramble scrub and woodland should be conducted using hand tools when hazel dormice are likely to have finished breeding but before they enter hibernation between 1st September and 31st October, in line with the current best practice for dormouse mitigation (Bright, P., Morris, P. & Mitchell-Jones, A., 2006).
- A licensed ECoW should supervise vegetation clearance works over the bramble scrub and woodland to ensure no dormice are harmed or injured. A phased approach to vegetation

clearance will be undertaken of the bramble scrub where the ECoW will periodically check the vegetation at convenient points to confirm that dormice and dormice field signs are absent.

In the unlikely event that hazel dormice or field signs for hazel dormice are identified, all works should cease immediately, and Natural England should be contacted for advice on how best to proceed lawfully.

5.6.2 Further Survey Requirements

Bats

Trees T9, T11, T12, T13, T14, T16, T28 and T29 were assessed as FAR, in accordance with best practice guidelines (Collins, 2023).

Further surveys for all trees assessed as FAR should be carried out according to one of the following methods:

- Aerial Inspection Surveys: three visits (either by ladder, climbing or mobile elevating work platform (MEWP)) to be conducted between May and September, with at least two from May to August inclusive. The visits should be carried out at least three weeks apart and during optimal weather conditions for surveying bats.
- Dusk Emergence Surveys: three visits to be conducted between May and September, with at least two visits between May to August inclusive. The visits should be carried out at least three weeks apart and during optimal weather conditions for surveying bats.

5.6.3 BNG Assessment

FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.61		
	Hedgerow units	0.00		
	Watercourse units	-0.02		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-93.25%		
	Hedgerow units	0.00%		
	Watercourse units	-100.00%		
Trading rules satisfied?	No - Check Trading Summaries ▲			
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	0.65	0.72	0.67
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.02	0.02	0.02

Habitats

Under current proposals, all habitat areas on site will be lost (see Figure 4). The creation of unvegetated garden, vegetated garden, developed land; sealed surface habitats increase the unit deficit, but the scheme will still result in a biodiversity net loss of -93.25% (-0.61 units) for habitats.

Therefore, a biodiversity net gain for broad habitats and compliance with trading rules (i.e., habitats proposed are like-for-like or better) cannot be achieved under the current proposals.

Hedgerows

Under current proposals, the ditch will be lost with no proposed watercourses to be created. Therefore, the current scheme will result in a biodiversity net loss of 100% (0.02 units) for watercourses.

Therefore, a biodiversity net gain for watercourses and compliance with trading rules (i.e., watercourses proposed are like-for-like or better) cannot be achieved under the current proposals as the 10% net gain target has not been met.

As shown in the screenshot above, the unit deficit for area habitats is -0.67 units and -0.02 units for watercourses. In order to achieve biodiversity net gain, off-site compensation will be required via the purchase of off-site units or credits for both area and linear habitat types. The LPA should be contacted to discuss opportunities for off-site units and/or biodiversity tariffs.

The following off-site unit providers and marketplaces could also be used to offset the unit deficit.

- Biodiversity Gains Site Register: <https://www.gov.uk/guidance/search-the-biodiversity-gain-sites-register>
- Environmental Trading Platform: <https://environmentaltradingplatform.com/>
- Gaia: <https://marketplace.gaiacompany.io/hub/marketplace>
- Future Homes Hub BNG Unit Finder Map: <https://www.futurehomes.org.uk/biodiversityunitfindermap>
- Accelar BNG finder: <https://www.bngfinder.co.uk/>
- Savills Environmental Exchange: <https://www.savills.co.uk/landing-pages/savills-environmental-exchange.aspx>

5.6.4 Further Ecological Enhancements

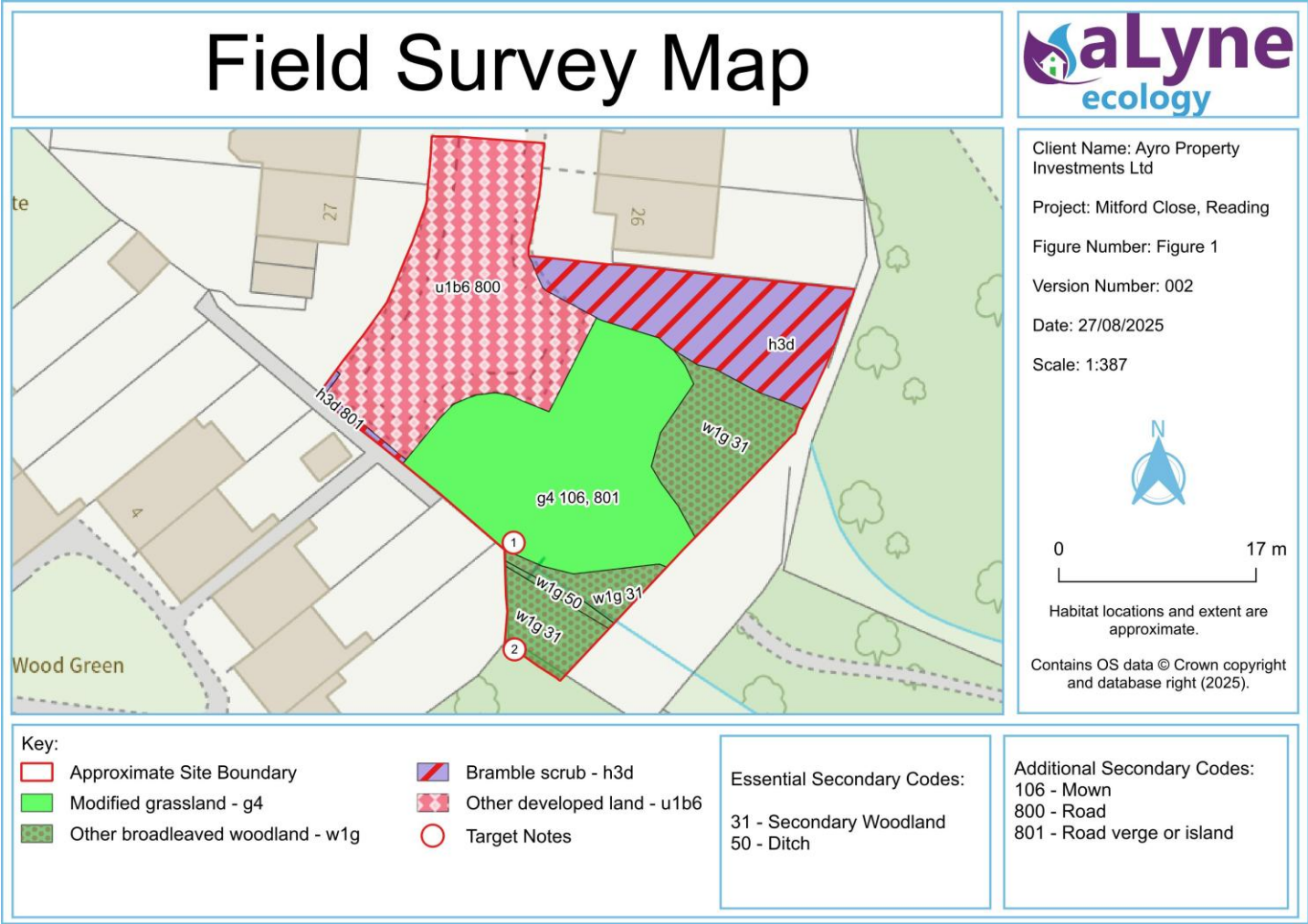
The further ecological enhancements for the site recommended in aLyne Ecology's Preliminary Ecological Appraisal & Ground Level Tree Assessment report (aLyne Ecology, 2025) should be implemented, where possible.

6. References

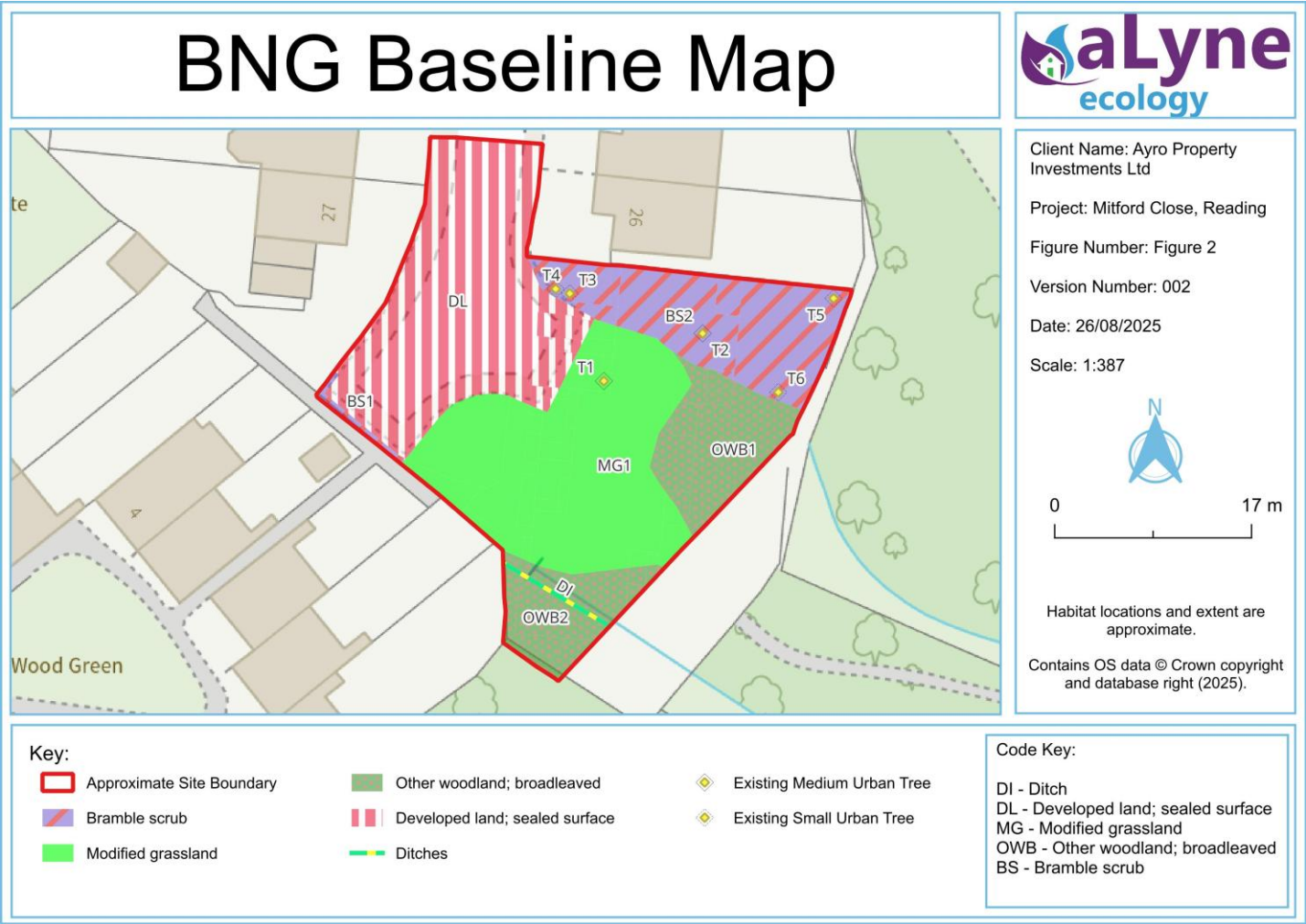
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7. Figures

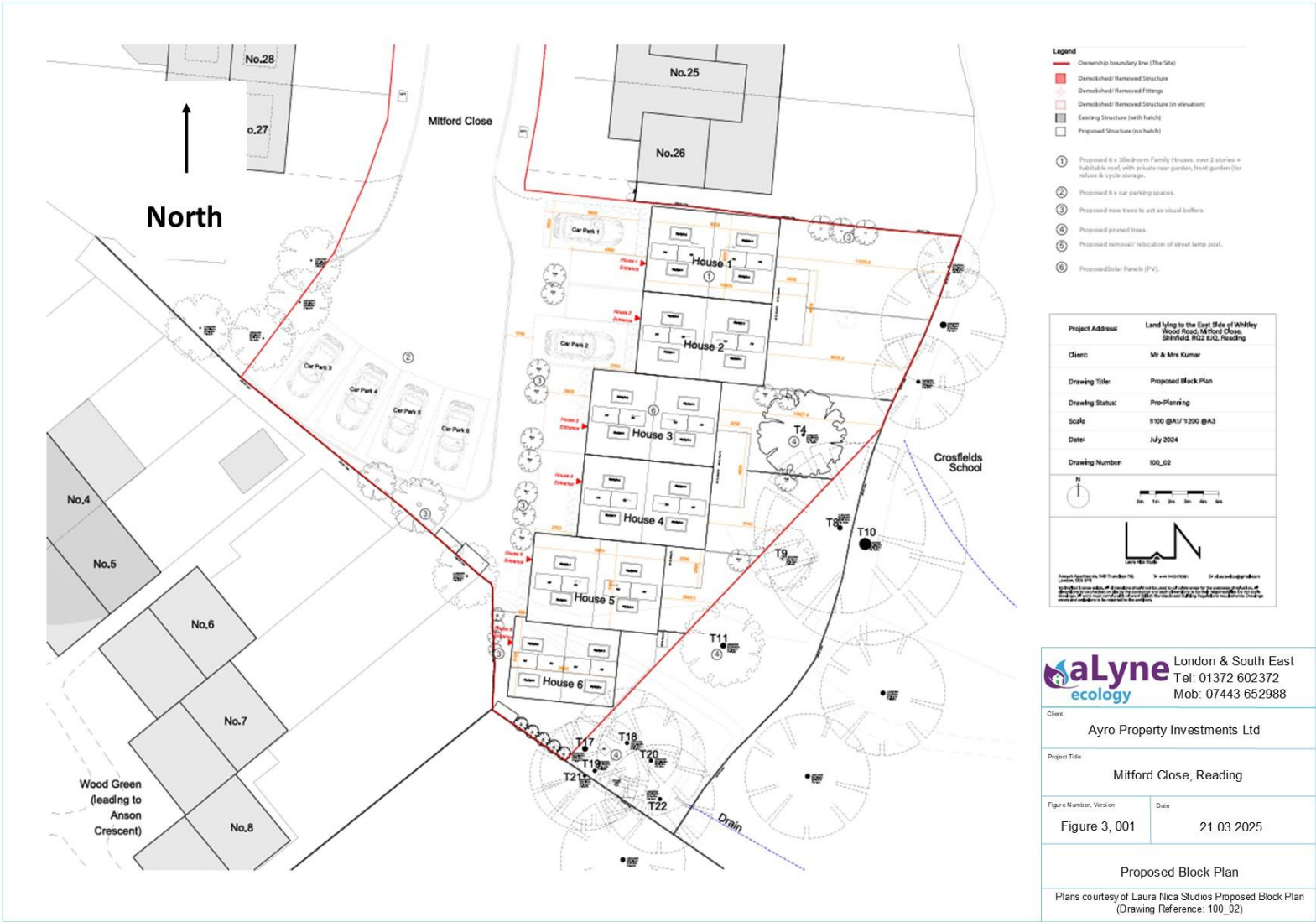
7.1 Figure 1: Results of Field Survey



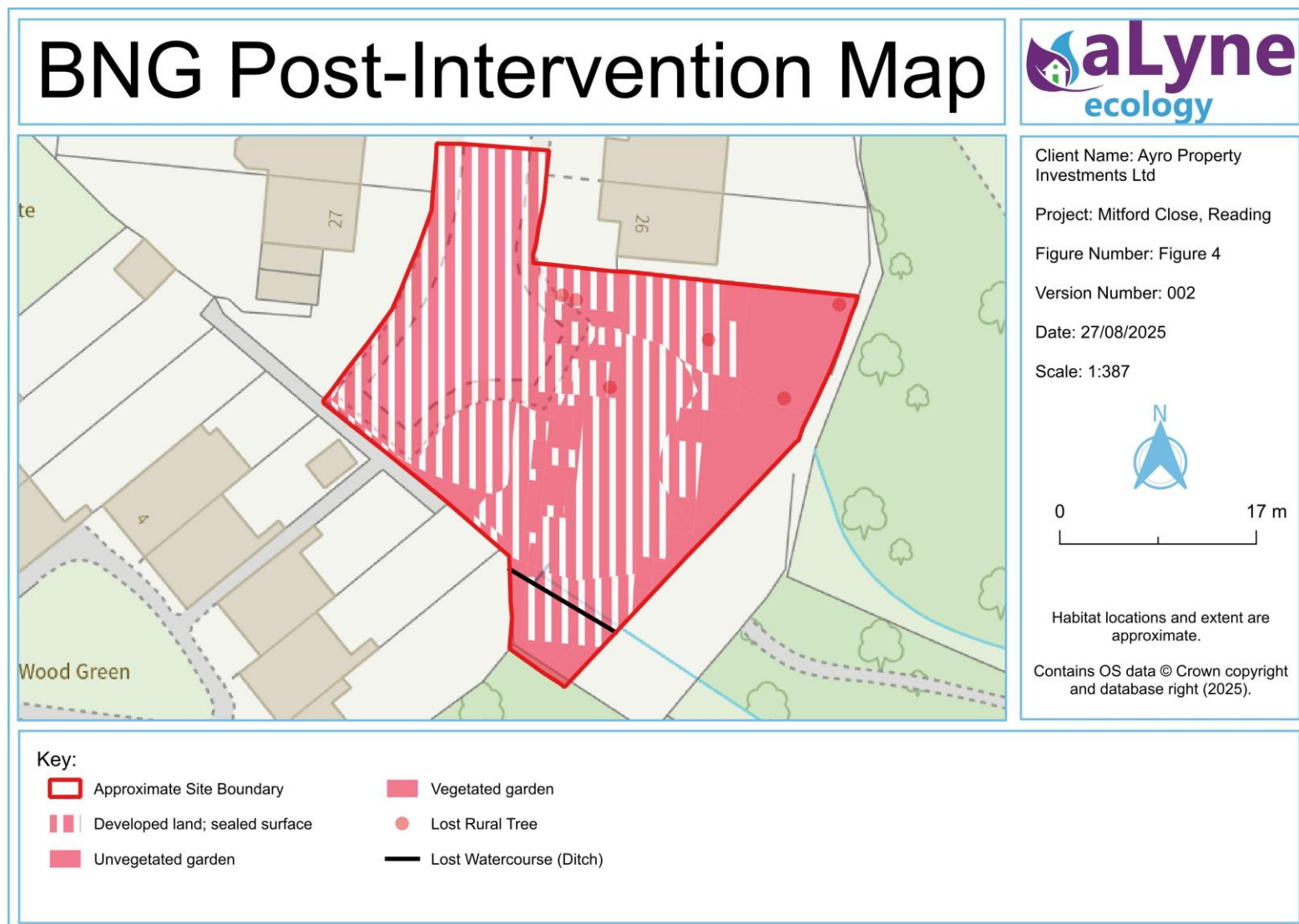
7.2 Figure 2: BNG Baseline Map



7.3 Figure 3: Proposed Site Plan



7.4 Figure 4: BNG Post-Intervention Map



7.5 Figure 5: BNG Retention, Loss/Creation, and Enhancement Plan



8. Appendix 1 – BNG

8.1 Introduction

8.1.1 What is Biodiversity Net Gain?

Biodiversity Net Gain is defined as: “*Development that leaves biodiversity in a better state than before, and an approach where developers works with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation*” (Baker, Hoskin, & Butterworth, 2019). The UK’s Good Practice Principles for Biodiversity Net Gain provides a framework for development projects to show that they are following good practice (Baker, Hoskin, & Butterworth, 2019).

Biodiversity Net Gain has been described as a measurable target for development projects, where impacts on biodiversity are outweighed by a clear mitigation hierarchy approach to first avoid and then minimise impacts, including through restoration and/or compensation. Adhering to these Biodiversity Net Gain principles will help in underpinning good practice for achieving and sustaining Biodiversity Net Gain. Biodiversity compensation should be planned for a sustained net gain over at least the lifetime of the development (often 25-30 years), with the objective of Biodiversity Net Gain management continuing in the future.

Biodiversity Net Gain should be proportionate to the scale of the development and scale of biodiversity impact, fit in with the project’s lifespan and have the appropriate level of detail for the complexity of the Biodiversity Net Gain targets.

8.2 Legislation and Policy Drivers

For some time, the requirement to include ecological enhancements in development projects has been supported by the National Planning Policy Framework (HM Government, 2024) and the Natural Environment and Rural Communities (NERC) Act, 2006 (HM Government, 2006). Both place a requirement on Local Planning Authorities to thread ecological enhancement requirements through regional and local planning policy.

The forthcoming Environment Bill will make the implementation of Biodiversity Net Gain mandatory for development projects. Part 3(1) of Schedule 15 of the Environment Bill makes it clear that planning authorities will only approve a Biodiversity Net Gain plan if they are satisfied with the following:

1. The existing pre-development biodiversity value of the site is identified.
2. The proposed post-development biodiversity value of the site is as specified in the Biodiversity Net Gain plan.
3. That any required off-site Biodiversity Net Gain is formally registered and allocated and delivers sufficient gain.
4. That any biodiversity credits specified in the plan have been purchased.
5. Overall, the Biodiversity Net Gain objective has been met.

Local Planning Authorities will be required to prepare Local Nature Recovery Strategies (LNRS), which will provide the local framework for the delivery of Biodiversity Net Gain and inform the development planning process. In the meantime, Biodiversity Net Gain plans should be aligned to existing local plan biodiversity targets and Supplementary Planning documents.

8.3 Biodiversity Net Gain Principles

The following principles are taken from Biodiversity Net Gain. Good Practice Principles for Development (Baker, Hoskin, & Butterworth, 2019).

8.3.1 Principle 1 – Applying the Mitigation Hierarchy

Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.

8.3.2 Principle 2 – Avoid Losing Biodiversity that cannot be Offset by Gains Elsewhere

Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.

8.3.3 Principle 3 – Be Inclusive and Equitable

Engage stakeholders early, and involve them in designing, implementing, monitoring, and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.

8.3.4 Principle 4 – Address Risks

Mitigate difficulty, uncertainty, and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.

8.3.5 Principle 5 – Make a Measurable Net Gain Contribution

Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.

8.3.6 Principle 6 – Achieve the Best Outcomes for Biodiversity

Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when:

- Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses.
- Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation.
- Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional, and national levels.
- Enhancing existing or creating new habitat.
- Enhancing ecological connectivity by creating more bigger, better, and joined areas for biodiversity.

8.3.7 Principle 7 – Be Additional

Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e., do not deliver something that would occur anyway).

8.3.8 Principle 8 – Create a Net Gain Legacy

Ensure Net Gain generates long-term benefits by:

- Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity.
- Planning for adaptive management and securing dedicated funding for long-term management.

- Designing Net Gain for biodiversity to be resilient to external factors, especially climate change
- Mitigating risks from other land uses.
- Avoiding displacing harmful activities from one location to another.
- Supporting local-level management of Net Gain activities.

8.3.9 Principle 9 – Optimise Sustainability

Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.

8.3.10 Principle 10 – Be Transparent

Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

8.4 Exclusions

Biodiversity Net Gain does not apply to statutory designated sites (i.e., Sites of Special Scientific Interest – SSSIs) or irreplaceable habitats (i.e., ancient woodlands).

8.5 Biodiversity Net Gain Processes and Pathways

The following is a summary of the process of designing a Biodiversity Net Gain plan, once the feasibility of the plan has been tested, the mitigation hierarchy has been applied to the project and the pre and post development baseline biodiversity of a sites' individual features have been measured.

- Consider and justify choices for delivering Biodiversity Net Gain, including whether to deliver the same or different type of habitat, locating either within or outside of the site, enhancing existing habitats, or creating new habitats, creating more, bigger and better linked habitats, improving the quality of local wildlife sites, optimising social and economic benefits and being additional.
- Deliver like-for-like or better (trading in kind, trading between low distinctiveness habitats, trading carefully between moderate distinctiveness habitats, trading up where possible and appropriate and not trading between high distinctiveness habitats).
- Designing enhancement measures to deliver local biodiversity objectives and achieve net gains in features affected by the development in ways which contribute towards strategic policies.
- Avoid or minimise time-lags between losses and delivery.
- Avoid or minimise risks to delivering Biodiversity Net Gain.
- Measure the predicted net gain for individual habitats using the same metrics throughout.
- Specify timescales for the long-term.
- Develop a Biodiversity Net Gain management and monitoring plan.

8.6 Measuring Biodiversity Net Gain

Defra have produced the Statutory Biodiversity Metric (DEFRA, 2024) to measure Biodiversity Net Gain. The metric is based on the following parameters. Full details can be found in Natural England Joint Publication JP029 – The Statutory Biodiversity Metric Technical Supplement.

- Habitat condition.
- Distinctiveness.

A summary of these parameters is provided in the following sections:

8.6.1 Habitat Condition

The 'condition' component of quality measures the biological 'working-order' of a habitat type judged against the perceived ecological optimum state for that particular habitat. It is – therefore – a means of measuring variation in quality of patches of the same habitat type (i.e., an 'intra-habitat' quality measure) rather than a measure of quality between habitat types (i.e., an 'inter-habitat' quality measure) – which is assessed through the 'distinctiveness' of habitats. Full details of how habitat condition is assessed is provided in Natural England Joint Publication JP029.

8.6.2 Distinctiveness

In the Statutory Biodiversity Metric habitats have been assigned to distinctiveness bands based on the following criteria of distinguishing features:

- Total amount of remaining habitat in England (its rarity).
- Percentage of habitat protected in SSSI: where less is protected in SSSI's, it is considered of higher distinctiveness.
- UK Priority Habitat Status: Priority Habitats area classed as High or Very High.
- European Red List Categories for the habitat.

Distinctiveness categories are as follows:

Distinctiveness Band	Criterion Threshold
Very High Distinctiveness	Small amount of remaining habitat with a lot of it unprotected by designation. Endangered or Critical European red List habitats.
High Distinctiveness	Remaining Priority Habitats not in very high distinctiveness band & other red list of habitats.
Medium Distinctiveness	Non-Priority Habitats with significant wildlife benefit and 1 replaceable Priority Habitat (Arable field Margins).
Low Distinctiveness	Agricultural and Urban land use of lower biodiversity value.
Very Low Distinctiveness	Urban – with artificial structure which are un-vegetated, unsealed surface or built linear features of very low biodiversity value.

8.6.3 Strategic Significance

The following options are available in the Statutory Biodiversity Metric for Strategic Significance:

- Within area formally identified in local strategy (high strategic significance).
- Local ecologically desirable, but not in local strategy (medium strategic significance).
- Area/compensation not in local strategy/no local strategy (low strategic significance).

8.7 Management and Monitoring

Costed management and monitoring plans are essential to the success of Biodiversity Net Gain. Plans should keep track of timing, extent, quality, and condition.

The purpose of monitoring is to determine success or failure, gives an early warning system when aspects of management are not working and provides an opportunity to plan for remedial measures (adaptive management). Monitoring needs to take into consideration frequency, duration, timing, and costs. The results of monitoring need to be clearly documented.

Management and monitoring plans should set out activities over at least 5 years, with objectives for the longer-term.

The responsibility for management can fall to the main contractor, a broker, a local stakeholder, or a third-party company.

9. Appendix 2 – Habitat Condition Assessments

9.1 Habitats

9.1.1 Modified Grassland

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	On-site	Survey date and Surveyor name	Charlie Gardiner BSc (Hons) ACIEEM - 17th March 2025
Limitations (if applicable)	None	Survey reference (if relating to a wider survey)	None
Grid reference	SU7292169619	Habitat parcel reference	MG1
Habitat Description			
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.	N	Approximately 3 species per m2.
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.	N	Mown grassland
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.	Y	No scrub present or less than 20% of grassland area.
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.	N	Damage from periodical mowing and recreational use by local residents for dog walking.
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	N	Bare ground is greater than 10% across the grassland plot.
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Y	No bracken present
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Y	No invasive non-native species
Essential criterion achieved (Yes or No)		N	
Number of criteria passed		3	
Condition Assessment Result (out of 7 criteria)	Condition Assessment Score	Score Achieved x/7	
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)	Poor	
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).			

9.1.2 Other Woodland; Broadleaved

ukhab - UK Habitat Classification														
This condition sheet is based on the England Woodland Biodiversity Group (EWBG) Woodland Condition Survey Method, available here:														
Woodland Wildlife Toolkit (sylva.org.uk)														
IMPORTANT: This biodiversity metric woodland condition assessment must be used to assess woodland being input into the biodiversity metric. The outputs of this condition assessment are not equivalent to, nor are they comparable with the scores from the EWBG condition assessment, because the EWBG assessment has been adapted for the biodiversity metric, including the removal of EWBG Indicator 7 (Proportion of favourable land cover around woodland) and Indicator 14 (Size of woodland), and minor changes to other indicators.														
On-site or off-site, site name and location	One-site	Survey date and Surveyor name	Charlie Gardiner BSc (Hons) ACIEEM - 17th March 2025	Habitat parcel reference										
				OWB1	OWB2									
Limitations (if applicable)	None	Survey reference (if relating to a wider survey)	None	Grid reference										
				SU72 93469 620	SU729 196960 5									
Condition Assessment Criteria														
Indicator	Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator										Notes (such as justification)
A Age distribution of trees	Three age-classes ¹ present.	Two age-classes ¹ present.	One age-class ¹ present.	2	2									Only two age groups present
B Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland ² .	Evidence of significant browsing pressure is present in less than 40% of whole woodland ² .	Evidence of significant browsing pressure is present in 40% or more of whole woodland ² .	3	3									No evidence of browsing present
C Invasive plant species	No invasive species ³ present in woodland.	Rhododendron <i>Rhododendron ponticum</i> or cherry laurel <i>Prunus laurocerasus</i> not present, and other invasive species ³ <10% cover.	Rhododendron or cherry laurel present, or other invasive species ³ ≥10% cover.	3	3									No evidence of invasive species
D Number of native tree species	Five or more native tree or shrub species ⁴ found across woodland parcel.	Three to four native tree or shrub species ⁴ found across woodland parcel.	Two or less native tree or shrub species ⁴ across woodland parcel.	2	2									Four species - Hawthorn, Field Maple, Ash, Hazel
E Cover of native tree and shrub species	>80% of canopy trees and >80% of understorey shrubs are native ⁵ .	50 - 80% of canopy trees and 50 - 80% of understorey shrubs are native ⁵ .	<50% of canopy trees and <50% of understorey shrubs are native ⁵ .	1	1									Excluding Sycamore and (White) Poplar
F Open space within woodland	10 - 20% of woodland has areas of temporary open space ⁶ . Unless woodland is <10ha, in which case 0 - 20% temporary open space is permitted ⁷ .	21 - 40% of woodland has areas of temporary open space ⁶ .	<10% or >40% of woodland has areas of temporary open space ⁶ . But if woodland <10ha has <10% temporary open space, please see Good category ⁷ .	3	3									10-20% open space given site is less than 10ha
G Woodland regeneration	All three classes present in woodland ⁸ , trees 4 - 7 cm Diameter at Breast Height (DBH), saplings and seedlings or advanced coppice regrowth.	One or two classes only present in woodland ⁸ .	No classes or coppice regrowth present in woodland ⁸ .	3	3									Regeneration present in the woodland with varying age diameters.
H Tree health	Tree mortality 10% or less, no pests or diseases and no crown dieback ⁹ .	11% to 25% tree mortality and or crown dieback or low risk pest or disease present ⁹ .	Greater than 25% tree mortality and or any high-risk pest or disease present ⁹ .	2	2									Ash present in woodland which suffers from Chalara Fraxiniae
I Vegetation and ground flora	Recognisable NVC plant community ¹⁰ at ground layer present, strongly characterised by ancient woodland flora specialists.	Recognisable woodland NVC plant community ¹⁰ at ground layer present.	No recognisable woodland NVC plant community ¹⁰ at ground layer present.	1	1									No recognisable NVC present
J Woodland vertical structure	Three or more storeys across all survey plots, or a complex woodland ¹¹ .	Two storeys across all survey plots ¹¹ .	One or less storey across all survey plots ¹¹ .	2	2									Two storeys of structure (canopy/understorey)
K Veteran trees	Two or more veteran trees ¹² per hectare.	One veteran tree ¹² per hectare.	No veteran trees ¹² present in woodland.	1	1									No veteran trees present
L Amount of deadwood	50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, branch stubs and stumps, or an abundance of small cavities ¹³ .	Between 25% and 50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities ¹³ .	Less than 25% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities ¹³ .	1	1									Less than 25% deadwood present across the woodland plots
M Woodland disturbance	No nutrient enrichment or damaged ground evident ¹⁴ .	Less than 1 hectare in total of nutrient enrichment across woodland area, and or less than 20% of woodland area has damaged ground ¹⁴ .	1 hectare or more of nutrient enrichment, and or 20% or more of woodland area has damaged ground ¹⁴ .	2	2									Woodland is less than 1ha but has obvious signs of disturbance from people and dogs
Total Score (out of a possible 39)				26	26									
Condition Assessment Result		Condition Assessment Score		Result Achieved										
Total score >32 (33 to 39)		Good (3)												
Total score 26 to 32		Moderate (2)												
Total score <26 (13 to 25)		Poor (1)		1	1									

9.1.3 Individual Trees (Urban Trees)

Condition Sheet: INDIVIDUAL TREES Habitat Type													
Habitat Types													
Individual trees – Urban trees Individual trees – Rural trees Complete a condition sheet for each tree or block of trees.													
<i>Please see the separate Line of trees condition sheet for a line of <u>rural</u> trees. You should only use the Line of trees condition assessment and record that habitat type in <u>rural</u> locations.</i>													
Habitat Description													
Individual trees (description applied to the urban or rural environment): Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.													
Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only): Groups or stands of trees (size requirement as defined above) within and around the perimeter of urban land. This includes those along urban streets, highways, railways and canals, and also former field boundary trees incorporated into developments. Canopies should predominantly overlap continuously. Groups of urban trees that don't match the descriptions for woodland may be assessed within this category.													
On-site or off-site, site name and location	On-site		Survey date and Surveyor name		Charlie Gardiner BSc (Hons) ACIEEM - 17th March 2025								
			Survey reference (if relating to a wider survey)		None								
Limitations (if applicable)	None		Habitat parcel reference										
			T1	T2	T3	T4	T5	T6					
Condition Assessment Criteria		Grid reference											
		SU72 92469 626	SU72 9326 9630	SU72 9216 9634	SU72 92069 634	SU72 94469 633	SU72 9396 9625						
		Criterion passed (Yes or No)								Notes (such as justification)			
A	The tree is a native species (or at least 70% within the block are native species).		N	N	N	N	N	Y					T1 to T5 Leylandii Cypress and Sycamore. T6 - Field Maple
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).		Y	Y	Y	Y	Y	Y					Auto-pass
C	The tree is mature (or more than 50% within the block are mature) ¹ .		Y	Y	Y	N	N	N					T1 to T3 - Mature
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.		Y	Y	Y	N	N	Y					T4 and T5 - on the verge of bramble scrub and developed land. T4 decaying due to competition from T3. T5 growing
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.		N	N	N	Y	N	N					T4 - Decaying and standing deadwood
F	More than 20% of the tree canopy area is oversailing vegetation beneath.		Y	Y	Y	Y	Y	Y					All trees either bramble scrub or modified grassland
Number of criteria passed			4	4	4	3	2	4					
Condition Assessment Result (out of 6 criteria)	Condition Assessment Score		Score Achieved x/√										
Passes 5 or 6 criteria	Good (3)												
Passes 3 or 4 criteria	Moderate (2)		4	4	4	3		4					
Passes 2 or fewer criteria	Poor (1)						2						

9.2 Watercourses

9.2.1 Ditches

Condition Sheet: DITCH Habitat Type			
Habitat Type			
Watercourses - Ditches			
Habitat Description			
See the Statutory Biodiversity Metric User Guide.			
On-site or off-site, site name and location	On-site	Survey date and Surveyor name	Charlie Gardiner BSc (Hons) ACIEEM - 17th March 2025
Limitations (if applicable)	None	Survey reference (if relating to a wider survey)	None
Grid reference	SU7292069607	Habitat parcel reference	DI
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	The ditch is of good water quality, with clear water (low turbidity) indicating no obvious signs of pollution.	N	Ditch is dry.
B	A range of emergent, submerged and floating-leaved plants are present. As a guide >10 species of emergent, floating or submerged plants present in a 20 m ditch length.	N	Ditch is dry. Only Marsh Marigold present.
C	There is less than 10% cover of filamentous algae and or duckweed <i>Lemna</i> spp. (these are signs of eutrophication).	Y	Ditch is dry.
D	A fringe of aquatic marginal vegetation is present along more than 75% of the ditch.	N	No aquatic marginal vegetation for more than 75% of the ditch
E	Physical damage is evident along less than 5% of the ditch, with examples of damage including: excessive poaching, damage from machinery use or storage, or any other damaging management activities.	Y	Evidence of previous machinery use nearby with tracks
F	Sufficient water levels are maintained - as a guide a minimum summer depth of approximately 50 cm in minor ditches and 1 m in main drains.	N	Ditch is dry
G	Less than 10% of the ditch is heavily shaded.	N	Heavily shaded ditch within woodland.
H	There is an absence of non-native plant and animal species ¹ .	Y	No invasive non-native plant species present.
Number of criteria passed		3	
Condition Assessment Result (out of 8 criteria)	Condition Assessment Score	Score Achieved x/√	
Passes 8 criteria	Good (3)		
Passes 6 or 7 criteria	Moderate (2)		
Passes 5 or fewer criteria	Poor (1)	Poor	

10. Appendix 3 – Species Lists

On-site Habitat	Baseline Habitat	Habitat Reference Number	Parcel Number	Common Name	Species Name
Modified Grassland		MG1		Common daisy Couch grass Creeping buttercup Curled dock Dove's-foot crane's-bill Goose grass (cleavers) Hogweed Lords-and-ladies Pendulous sedge Wood avens Yorkshire-fog	<i>Bellis perennis</i> <i>Elymus repens</i> <i>Ranunculus repens</i> <i>Rumex crispus</i> <i>Geranium molle</i> <i>Galium aparine</i> <i>Heracleum sphondylium</i> <i>Arum maculatum</i> <i>Carex pendula</i> <i>Geum urbanum</i> <i>Holcus lanatus</i>
Bramble Scrub		BS1		Ash Bramble Dog rose Forsythia Ivy	<i>Fraxinus excelsior</i> <i>Rubus fruticosus</i> <i>Rosa canina</i> <i>Forsythia</i> spp. <i>Hedera helix</i>
Bramble Scrub		BS2		Bramble Dove's-foot crane's-bill Goose grass Lords-and-ladies Yorkshire fog	<i>Rubus fruticosus</i> <i>Geranium molle</i> <i>Galium aparine</i> <i>Arum maculatum</i> <i>Holcus lanatus</i>
Other Woodland; Broadleaved		OWB1 and OWB 2		<u>Canopy</u> Ash Field maple Sycamore White Poplar <u>Understorey</u> Field maple Hazel <u>Ground Layer</u> Ash Bramble Colt's foot Common daisy Common dandelion Common nettle Dog mercury Dog rose Goose grass Green alkanet Hawthorn Honeysuckle Ivy Marsh marigold Pendulous sedge Primrose Tutsan Wild parsnip	<i>Fraxinus excelsior</i> <i>Acer campestre</i> <i>Acer pseudoplatanus</i> <i>Populus alba</i> <i>Acer campestre</i> <i>Corylus avellana</i> <i>Fraxinus excelsior</i> <i>Rubus fruticosus</i> <i>Tussilago farfara</i> <i>Bellis perennis</i> <i>Taraxacum officinale</i> <i>Urtica dioica</i> <i>Mercurialis perennis</i> <i>Rosa canina</i> <i>Galium aparine</i> <i>Pentaglottis sempervirens</i> <i>Crataegus monogyna</i> <i>Lonicera periclymenum</i> <i>Hedera helix</i> <i>Caltha palustris</i> <i>Carex pendula</i> <i>Primula vulgaris</i> <i>Hypericum androsaemum</i> <i>Pastinaca sativa</i>