



Biodiversity Net Gain Assessment



Scott Taylor
Redgate Mill, Twineham Lane, Twineham, Haywards Heath, West Sussex, RH17 5NP

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1 Introduction

1.1 Background & Context

The client, Scott Taylor, has instructed ACP Consultants Ltd to conduct a Biodiversity Net Gain (BNG) assessment. The survey was commissioned to accompany the planning application to the Mid Sussex District Council for the “proposed construction of an ancillary rural pavilion, installation of a low-level timber maintenance boardwalk, formation of informal gravel maintenance paths, retrospective completion and retention of wildlife pond and associated ecological enhancements, and associated change of use of land to ancillary residential and ecological use” (hereafter referred to as ‘the proposed development’) at Redgate Mill, Twineham Lane, Twineham, Haywards Heath, West Sussex, RH17 5NP (hereafter referred to as ‘the site’). The proposed development plan is provided in **Appendix 1**.

The site is located at National Grid Reference TQ 25650 19899 and has an area of approximately 0.41ha. The site is situated in a semi-rural setting, with residential homes and private gardens and agricultural land present in the immediate vicinity. The site itself comprises grassland, hedgerows and trees. Present to the northwestern periphery is a traditional orchard and a deciduous woodland is present ~15m from the northeastern periphery of the site.

This report should be read in conjunction with the following:

- Statutory Biodiversity Metric: 32745 Redgate Mill, RH17 5NP – SBM – RevA (ACP Consultants Ltd, 2026)
- Proposed Plans: Redgate Mill, RH17 5NP (The Garden Design Studio By Scott Taylor, 2026)
- Tree Survey Report: Redgate Mill, RH17 5NP (Arbor Cultural Ltd, 2026)

1.2 BNG Informative

As a stipulation of the Environment Act (2021), BNG sets a legal commitment for qualifying developments to generate a net positive impact on habitats, specifically targeting a minimum +10% measurable uplift from the baseline, leaving biodiversity in a better state than before. Developments must adhere to the ten good practice principles (*British Standard 8683:2021 – Process for Designing and Implementing Biodiversity Net Gain*) to achieve and sustain net gain.

A standardised procedure is strictly followed, with four rules underpinning the calculations that generate Biodiversity Unit values of the site as a proxy for biodiversity:

1. Statutory instruments (e.g. metric calculation tool, user guide, and condition assessments, be it the Statutory Biodiversity Metric or the Statutory Small Sites Metric) must be used to accurately apply the biodiversity metric formula.
2. Biodiversity unit outputs for area-, linear-, and watercourse-based habitats must not be summed, traded, or converted between unit types; the requirement to deliver minimum +10% net gain applies to each type of unit which is present in the baseline.
3. Like-for-like or like-for-better principles of trading rules must be followed.
4. Demonstrate application of the BNG Mitigation Hierarchy of first avoiding and minimising adverse impacts before compensatory mitigation.

Ideally, the +10% uplift should occur on-site within the red line development boundary. However, in cases where site constraints or other factors do not allow the uplift to be achieved on-site, off-site habitat creations and/or enhancements can be used to achieve BNG. Regardless of whether BNG is realised on-site or off-site, such gains in biodiversity are expected to be upheld for the long-term sustainability goals between stakeholders. Under mandatory BNG, proposed habitats must be subject to a planning condition or a section 106 agreement, requiring them to be maintained for at least 30 years after the development is completed in line with protocols set out in its Habitat Management and Monitoring Plan (HMMP).

Relevant policies and legislation are outlined in **Appendix 5**.

1.3 Scope of Report

The aims and objectives of the report are as follows:

- To establish the pre-development (baseline) biodiversity value of the site, including any degradation, if applicable.
- To establish the post-development (proposed) biodiversity value of the site.
- To calculate the net change of biodiversity value of the site as a result of the proposed development, and to determine whether the current proposed scheme generates a net loss, net gain, or no net change for all baseline broad habitat types (i.e. area-, linear-, and watercourse-based) present.
- To identify and outline any foreseen constraints to BNG, including any anticipated trading rule violations, and to give appropriate recommendations for habitat retention, creation, or mitigation, and if necessary, to outline further recommendations to achieve the required uplift.

2 Methodology

2.1 Desk Study

The desk study included the following investigations:

- Publication date and metric version used for the calculations.
- The National Character Area (NCA) of the site, as informed by the NCA Area Map (Natural England).
- Whether the site's Local Planning Authority (LPA) requires an uplift greater than the statutory +10%, and if so, what the minimum uplift is as required by local policy. This was achieved by reviewing the Local Plan, including any supplementary documents.
- Whether any priority or irreplaceable habitats as defined by the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 are present on site.
- Whether habitat degradation had taken place between 30 January 2020 and the date of the site visit. This was assessed via a review of historic aerial satellite images from GoogleEarth. Any identified degradation will impact the classification, condition, and risk multipliers applied and inputted within the Statutory Biodiversity Metric. Where historic data of the site was made available by the client, assumptions about conditions will have been made and justified within Table 3.1.
- Whether the site has an adopted Local Nature Recovery Strategy (LNRS) published, and whether habitats on site qualify for any increased strategic significance. This was determined using the LNRS: Responsible Authorities Guidance (DEFRA, 2026) and subsequently any Strategic Areas identified by the Local Habitat Maps.

2.2 Habitat Quality Inputs

Classification

Baseline and post-development habitats were classified in accordance with the UK Habitat Classification User Manual (v2; UKHabs, 2023):

- Baseline habitats were classified on site during the field survey, wherein all habitat parcels were described and mapped in line with the appropriate habitat classifications. Where required, deviations from on-site classifications were applied; such instances are justified in their respective baseline habitat descriptions within Section 3.2.1 of this report.
- Post-development proposed habitats were informed by the proposed plans, including any planting specifications (if provided), and assigned their most probable UKHabs equivalents. Using the plans, post-development proposed habitats were identified as either being retained (i.e. maintained in its baseline classification and condition), enhanced (i.e. an improvement in condition or distinctiveness relative to its baseline counterpart), or lost (i.e. destroyed and removed as a result of the proposed development).

Condition

The condition of baseline habitats was assessed with the relevant condition assessment sheets (DEFRA, 2025).

The condition of post-development proposed habitats had taken feasible 30-year management regimes into account and was also assessed using the relevant condition assessment sheets (DEFRA, 2025). The Temporal Multipliers Tool and Enhancement Temporal Multipliers Tool were utilised, where relevant, per circumstances outlined within the Statutory Biodiversity Metric User Guide (DEFRA, 2025).

Size

The extent of habitat parcels, be it area- or linear-based habitats, was determined using QGIS, an open-source geographic information system software which provides accurate area and length data for habitat polygons and linear hedgerows respectively. Each parcel that achieves a unique habitat classification and condition was inputted separately within the Statutory Biodiversity Metric. Where separate parcels of the same habitat type achieved the same condition, the area or length of the parcels were combined for ease of presentation and calculation.

The area of individual trees was calculated using the Tree Helper Tool within the Statutory Biodiversity Metric in line with class sizes set out in Table 15 of the Statutory Biodiversity Metric User Guide (DEFRA, 2025). As with other habitat parcels, trees that achieve different conditions were independently inputted.

Strategic Significance

The strategic significance of each distinct habitat type was determined in accordance with measures set out in Table 7 and Table 8 of the Statutory Biodiversity Metric User Guide (DEFRA, 2025). The investigation of Local Nature Recovery Strategies (LNRSs) as well as any rewarded increase in strategic significance is set out and justified within Section 3.1 of this report.

2.3 Mitigation Hierarchy

In line with the Statutory Biodiversity Metric User Guide (DEFRA, 2025), BNG should be achieved in accordance with the BNG Mitigation Hierarchy of:

1. **Avoidance** of adverse impacts to on-site habitats through layout of proposals to retain as much of the existing baseline habitats as possible;
2. If impacts to habitats are unavoidable, the extent of impacts should be **minimised** insofar as possible;
3. Once impacts have been minimised through design changes, their effects should be **mitigated on-site** where possible through, for example, the enhancement of any unaffected habitats;
4. If following the above and the required net gain or trading requirements are not satisfied, losses to biodiversity must be compensated for by ways of **offsetting off-site**:
 - Habitat creations or enhancements on client-owned off-site land;
 - Purchasing of biodiversity units of the appropriate distinctiveness from reputable habitat banks; or
 - Purchasing of statutory biodiversity credits of the appropriate distinctiveness from the UK Government.

2.4 Limitations

Following historic satellite review and the site visit, the site is considered to have undergone unauthorised degradation as areas of modified grassland and a section of hedgerow H01 have been removed in circa 2026. Degraded habitats were inferred from satellite imagery, and were condition assessed based on the remaining modified grassland area and hedgerow H01.

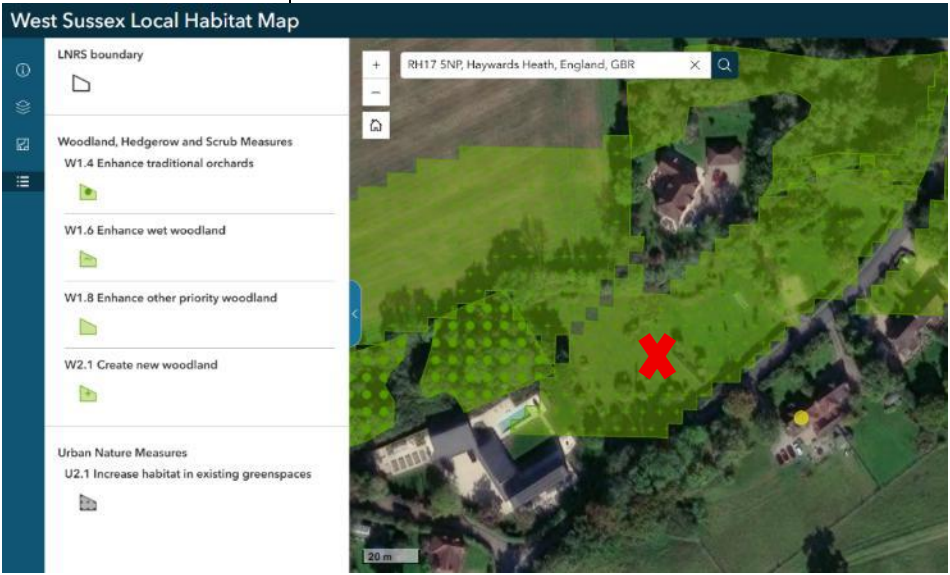
3 Results

3.1 Desk Study Results

Features of the desk study, comprising metric details, NCA of the site, BNG target uplift, irreplaceable habitats, habitat degradation, as well as strategic significance determination, are presented within Table 3.1 below.

Table 3.1: Summary of desk study results

Desk Study Feature	Findings	
Technical Competence of Assessors	The site visit and this report were undertaken and authored by Jemma Wybrow, BSc (Hons) MSc, an ecologist with experience in field surveys, trained under the UKHabs Classification System to undertake condition assessments of habitats, and has experience undertaking BNG assessments using the statutory metric. This report was reviewed by Michelle Huang, BSc MRes (DIC), senior ecologist and BNG lead, who has three years of experience undertaking BNG calculations in various versions of the metric.	
Metric & User Guide Details	Version	Statutory Biodiversity Metric Calculation Tool
	Publication Date	02 June 2026
NCA	121 – Low Weald	
BNG Target Uplift	+10%	
Irreplaceable Habitat Statement	This statement confirms no habitats as defined in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 are present on site and as such no impacts to any irreplaceable habitats are foreseen.	
Habitat Degradation Statement	Baseline Date	30 January 2020
	This statement confirms unauthorised habitat degradation appears to have occurred since 30 January 2020 as during the site visit on 13 July 2026, grassland in the northwest corner of the site had been removed to enable the installation of a pond, and a section of hedgerow along the southern periphery had been removed. Therefore, the baseline biodiversity value of the site is retrospectively backdated to habitats present on 30 January 2020, which appears to comprise modified grassland and trees.	
	 Satellite imagery of site prior to 30 January 2020	 Most recent satellite imagery of site

Desk Study Feature	Findings	
	 <i>Photo taken during site visit of modified grassland degradation and pond</i>  <i>Section of removed hedgerow</i>	
Strategic Significance	Local Nature Recovery Strategy (LNRS) Status	Published and adopted https://www.sussexnaturerecovery.org.uk/publications
	BNG Strategic Significance Map Layer	Potential Measure Locations (PML)
	 As shown in the screenshot above, the site is situated within the PML map layer where potential measures are recommended, as outlined below.	
	Potential Measure / Priority	<u>Create new woodland</u> : Create new areas of species-rich woodland and 'trees outside woodland' to expand and better connect existing woodland and deliver multiple benefits (such as habitat, flood risk reduction, water quality, shelter, access and recreation, landscape enhancement and carbon sequestration).
	Priority Actions	■ Recolonisation; regeneration; or planting. ■ Include open areas (glades and rides) in design and encourage 'edge habitats' (ecotones) of scrub or semi-natural habitat.

Desk Study Feature	Findings
	When planting, tree species choice should support biodiversity but consider climate/disease resilience and local landscape character. As the proposal does not seek to provide woodland creation or tree planting, the proposed intervention is not consistent with the mapped potential measure proposed by the LNRS. As such, no baseline or proposed habitats have been awarded any elevated strategic significance.

3.2 Baseline Habitats

A walkover of the site was undertaken by Jemma Wybrow, BSc (Hons) MSc, on 13 July 2026.

Table 3.2: Summary of conditions during survey

Factor	Recorded Value
Temperature (° Celsius)	23
Humidity (RH%)	57
Wind (mph)	21
Cloud Cover (%)	<5
Precipitation	None

3.2.1 Description & Condition Assessments

Satellite imagery from before 30 January 2020 was used to inform the baseline along with data collected during the site visit. From the satellite imagery, the majority of the site comprised modified grassland and trees along the western, northern, and eastern peripheries, and a hedgerow along the southern periphery. During the site visit, an additional hedgerow and drainage ditch along the northern periphery were also observed.

On-site habitats comprise modified grassland with scattered trees (g4 32), native hedgerow (priority habitat) (h2a), line of trees (w1 33), and line of trees with an associated ditch (w1 33 50). Full condition assessment sheets for baseline habitats, where relevant, can be found in **Appendix 4**.

Modified grassland with scattered trees (g4 32)

The site was predominantly modified grassland. Grass species present included **dominant** perennial ryegrass (*Lolium perenne*), **frequent** Timothy grass (*Phleum pratense*), and **occasional** crested dogs-tail (*Cynosurus cristatus*), cock's-foot (*Dactylis glomerata*), and Yorkshire fog (*Holcus lanatus*). Species interspersed within included **frequent** creeping buttercup (*Ranunculus repens*), **occasional** white clover (*Trifolium repens*), bird's-foot-trefoil (*Lotus corniculatus*), common fleabane (*Pulicaria dysenterica*), ribwort plantain (*Plantago lanceolata*), and broad-leaved dock (*Rumex obtusifolius*), and **rare** bristly ox-tongue (*Helminthotheca echioides*).

At the time of the site visit, a section of modified grassland had been removed to enable the installation of the pond and prepare for the erection of the ancillary building and decking, and to create access to the pond area. This unauthorised degradation had occurred circa 2026. The baseline for the degraded modified grassland area (A02) was assessed using satellite imagery and information collected during the site visit of the non-degraded modified grassland area (A01).

Two medium-sized trees were present in the northwest corner of the site: T05 (oak; *Quercus robur*) and T06 (field maple; *Acer campestre*). Tree references have been assigned to correspond with those in the Tree Survey Report (Arbor Cultural Ltd., 2026).

A small area of modified grassland will be removed to enable the installation of a gravel pathway. The land use type of the site is proposed to be changed from agricultural to ancillary residential; therefore,

the retained modified grassland and proposed grassland areas will be classified as vegetated garden. Trees T05 and T06 will be retained.

Condition assessment of modified grassland A01 (assessed using 'grassland low distinctiveness' habitat type sheet): the parcel failed the essential criterion A, therefore achieving **poor** condition.

Condition assessment of modified grassland A02: based on species present within A02 and the land use type of agricultural land, the parcel is considered to have been unlikely to achieve the essential criterion of 6-8 plant species per m². Therefore, the parcel is considered to have achieved **poor** condition.

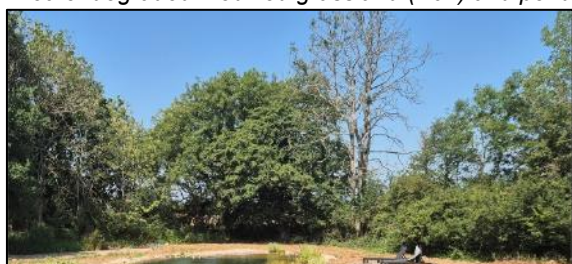
Condition assessment of scattered trees (assessed using 'individual tree' habitat type sheet: T05 and T06, assessed individually, passed all criteria, achieving **good** condition.



Area of degraded modified grassland (A02) and pond



Area of degraded modified grassland (A02)



Trees T05 and T06



Area A01

Native hedgerow (priority habitat) (h2a)

From satellite imagery, a native hedgerow (H01), ~74m in length, was present along the entire southern periphery of the site. During the site visit a section of this hedgerow, ~5m, was observed to have been removed (H01De). This unauthorised degradation had occurred circa 2026. Therefore, this section of degraded hedgerow (H01De) was assessed separately from the rest of the hedgerow that had not undergone degradation (H01). Species present in H01 included **dominant** oak, **abundant** blackthorn (*Prunus spinosa*) and brambles (*Rubus fruticosus*), and **frequent** field maple and hawthorn. Ground flora present included **occasional** ground ivy (*Glechoma hederacea*), broad-leaved dock, and nettles, and **rare** bristly ox-tongue and hemp agrimony (*Eupatorium cannabinum*). At the time of the site visit, the hedgerow species from H01De had been planted within area A01, with the intention of replanting into H01 post-development. The species present were consistent with the species and abundance present in H01.

A second native hedgerow, H02, ~20m in length, was present along the northern periphery. The hedgerow comprised entirely of blackthorn, with **frequent** brambles present. Ground flora comprised occasional common fleabane (*Pulicaria dysenterica*) and cow parsley (*Anthriscus sylvestris*), and rare broad-leaved dock.

Condition assessment of native hedgerow (assessed using 'hedgerow habitat' type sheet): H01 failed both criteria in group C, but passed all other criteria, therefore achieving **moderate** condition. H02 failed only one criterion, therefore achieving **good** condition.

Condition assessment of native hedgerow H01De: the removed hedgerow species were consistent with H01. Considering the condition of H01, H01De is considered unlikely to have passed the failed criteria of H01.



H01



H02

Line of trees (w1 33); Line of trees associated with ditch (w1 33 50)

A line of trees was present along the eastern periphery of the site (LT01) and a line of trees associated with a ditch was present along the northern periphery of the site. LT01 comprised 15no. trees, 2no. medium-sized and 13no. small-sized. Trees present comprised **dominant** ash (*Fraxinus excelsior*), **occasional** field maple, and **rare** oak. Habitats immediately adjacent to LT01 comprised modified grassland, with an off-site hardstanding driveway present to the east.

LT02 comprised 2no. of on-site trees, with the other trees present outside of the redline boundary, therefore leaving a small section of the line of trees habitat on site. The tree species were hawthorn (small-sized) and ash (small-sized). The drainage ditch was present to the south of the trees and off-site vegetated garden present to the north.

Condition assessment (assessed using 'line of trees habitat' type sheet): LT01 failed two criteria and LT02 failed one criterion, therefore both achieve **moderate** condition.



LT01



LT02

3.2.2 Summary of Baseline Metric Inputs

A summary of baseline habitats inputted into the metric, along with their extent, condition (where relevant), and strategic significance are outlined in Table 3.2.2 below. A baseline habitat plan is provided in **Appendix 2a**.

Table 3.2.2: Summary of on-site baseline habitats and their quality inputs

On-Site Baseline Area-Based Habitats (A-1)			
Habitat Type	Area (ha)	Condition	Strategic Significance
Modified grassland (A01)	0.2903	Poor	Low
Modified grassland (A02)	0.1185	Poor	Low
Individual tree (T05 and T06; medium-sized)	0.0326	Good	Low
On-Site Baseline Linear-Based Habitats (B-1)			
Habitat Type	Length (km)	Condition	Strategic Significance
Native hedgerow (H01)	0.069	Moderate	Low
Native hedgerow (H02)	0.020	Good	Low
Native hedgerow (H01De)	0.005	Moderate	Low
Line of trees (LT01)	0.032	Moderate	Low
Line of trees associated with ditch (LT02)	0.012	Moderate	Low

3.3 Post-Development Habitats

3.3.1 Description & Rationale

Proposed habitats, as informed by the proposals, were translated into their UKHabs equivalent. Assumptions and justification of such proposed habitats are summarised in Table 3.3.1 below.

Table 3.3.1: Proposed habitats as informed by the landscape plan

Landscape Plan Habitat	Translated UKHabs Equivalent	Target Condition	Rationale
Proposed vegetated garden	Vegetated garden	N/A	The land use change from agricultural to residential will result in the existing area of modified grassland being classified as vegetated garden. Proposed lawn space around the pond and around the proposed ancillary building will also be classified as vegetated garden. It is acknowledged this habitat, in practice, will be largely retained. However, as the metric has no method of reflecting change of use, such areas have been inputted as 'created vegetated gardens'.
Pond	Vegetated garden	N/A	The pond was present at the time of the site visit, within the northwest corner of the site within area A01.
Proposed ancillary building, decking, decking and footbridge	Developed land – sealed surface	N/A	The proposal seeks to erect an ancillary building, to be used to house the pond filtration system and as a storage room. Decking is proposed to be installed in front of the proposed building, and a footbridge had been installed across the drainage ditch at the time of the site visit.
Proposed gravel pathways	Artificial unvegetated – unsealed surface	N/A	Proposed gravel pathways extending from the footbridge, towards and around the pond to the proposed building.
Replanting of native hedgerow	Native hedgerow	Moderate	Hedgerow H01De is proposed to be replanted from area A01 into H01.

3.3.2 Summary of Post-Development Metric Inputs

A summary of proposed habitats inputted into the metric, along with their extent, target condition (where relevant), and strategic significance are outlined in Table 3.3.2 below. A post-development habitat plan is provided in **Appendix 2b**.

Table 3.3.2: Summary of on-site post-development habitats and their quality inputs

On-Site Post-Development Area-Based Habitats				
	Habitat Type	Area (ha)	Target Condition	Strategic Significance
Retained (A-1)	Individual tree (T05 and T06; medium-sized)	0.0326	Good	Low
Created (A-2)	Vegetated garden	0.3870	N/A	Low
	Developed land – sealed surface	0.0132	N/A	Low
	Artificial unvegetated – unsealed surface	0.0086	N/A	Low
On-Site Post-Development Linear-Based Habitats				
	Habitat Type	Length (km)	Target Condition	Strategic Significance
Retained (B-1)	Native hedgerow (H01)	0.069	Moderate	Low
	Native hedgerow (H02)	0.020	Good	Low
	Line of trees (LT01)	0.032	Moderate	Low
	Line of trees with associated ditch (LT02)	0.012	Moderate	Low
Recreated (B-2)	Native hedgerow (H01De)	0.005	Moderate	Low

3.4 Change in Biodiversity Value

The proposal seeks to remove modified grassland and retain native hedgerows, trees, and lines of trees creating vegetated garden, a building, and sealed and unsealed surfaces. The change in biodiversity value of the site is summarised in Table 3.4 below. Full details are provided in the Statutory Biodiversity Metric, while headline results of the calculation are presented in **Appendix 3**.

Table 3.4: Summary of biodiversity units and change in biodiversity value

		Biodiversity Units		
		Area-Based	Linear-Based	Watercourse-Based
On-Site	Baseline	1.21	0.59	N/A
	Post-Development	1.14	0.59	
Net Change		-0.07 (-5.85%)	0.00 (-0.55%)	

4 Discussion & Recommendations

4.1 Discussion

The proposals generate an on-site net change of **-5.85% in area-based units** and **-0.55% in linear-based units**, with trading rules not satisfied for either as a result of the proposed development.

At present, the site is lacking 0.19 area-based units and 0.06 linear-based units to achieve a +10% uplift in biodiversity value respectively. As a result, the proposed development is not compliant with current legislation (Environment Act 2021) and planning policies (National Planning Policy Framework, 2025).

4.2 Landscaping Recommendations

Creation of a green roof on the proposed ancillary building would reduce the net loss to -4.79% in area-based units.

4.3 Off-Setting Informative

Current proposal plans indicate net gain is unlikely to be achieved on-site for area-based and linear-based habitats due to the nature of vegetated gardens – no trees or hedges can be incorporated into the metric as their management cannot be secured within a residential curtilage. The client cannot commit to habitat creations or enhancements on client-owned off-site lands for a minimum of 30 years. As such, the purchase of off-site area-based and linear-based habitats from a reputable habitat bank is recommended. Any off-site compensation for BNG will need to be approved by the Local Planning Authority and would be secured to the application via a section 106 agreement or a conservation covenant entered with an approved responsible body. Units purchased must be of an appropriate distinctiveness to meet the trading rules of BNG.

A breakdown of the required units, as reflected by the current iteration of calculations (i.e. not considering the additional landscaping recommendations outlined above), is summarised in Table 4.3 below.

Table 4.3: Summary of required off-site units

	Distinctiveness	Broad Habitat Group	Habitat	Units Required
Area-Based	Low	Any	Any	0.19
	Total			0.19
Linear-Based	Low	Any	Any	0.06
	Total			0.06

4.4 BNG Mitigation Hierarchy

Application of and adherence to the BNG Mitigation Hierarchy is demonstrated in Table 4.4 below.

Table 4.4: Demonstration of BNG Mitigation Hierarchy

Principle	Evidence	Recommendations
Avoidance	Avoidance and further minimisation are not feasible to realise the proposal.	None.
Minimisation		
Mitigation	Vegetated garden has been incorporated within the proposal to mitigate for the loss of habitats on site.	A green roof on the proposed ancillary building is recommended.
Offset	Sufficient on-site mitigation is unlikely to be possible due to the constraints of habitat creation within the residential curtilage. As such, off-site offsetting will likely be required.	Purchase of biodiversity units from a reputable habitat bank. Units purchased must be of an appropriate distinctiveness to meet the trading rules of BNG.

4.5 Pre-Commencement Requirements

A Biodiversity Gain Plan (BGP) must be produced and approved by the LPA.

As all proposed habitats are of low distinctiveness, a Habitat Management and Monitoring Plan (HMMP) may not be required, at the discretion of the LPA.

4.6 Additional Ecological Enhancements

The following are opportunities for enhancement which could be incorporated into the proposed plans to improve the site's biodiversity post-development.

On-site Habitats

Within the proposed plans, a wildflower meadow is proposed to be planted in the southwest section of the site. Wildflowers chosen should be consistent with wildflowers found within the local landscape. This will increase foraging opportunities for invertebrates.

Bats

Proposed plans indicate the installation of three bat boxes. Suitable bat boxes include VK WS 04 Bat tree box or similar alternative brand. Boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light.

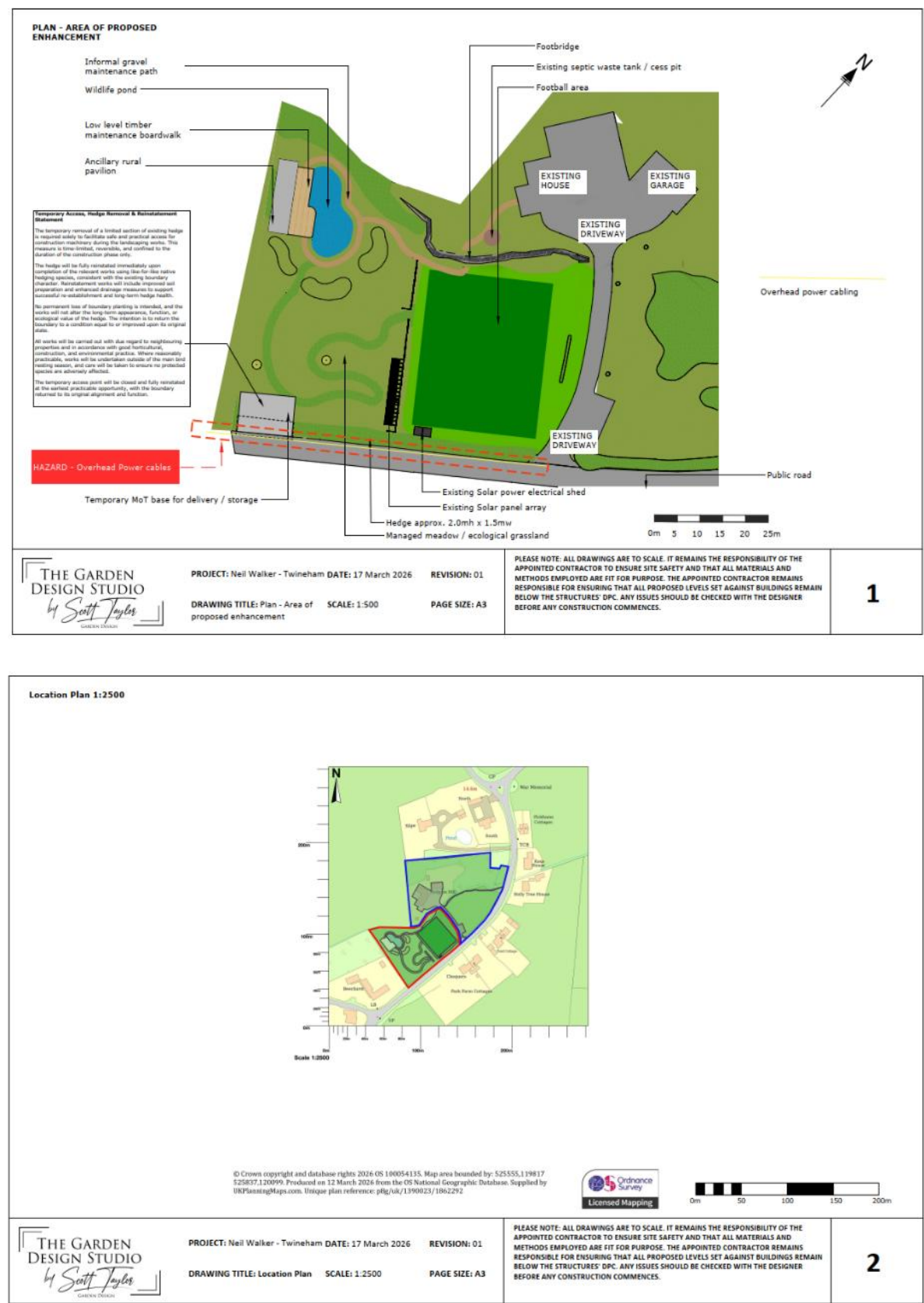
Birds

Proposed plans indicate the installation of three bird boxes. Suitable bird boxes include NK SE 01 Nest box 28 mm green or similar alternative brand, which will provide additional nesting habitat for birds. The boxes should be positioned 3m above ground level, on a tree facing north or east, where they will be sheltered from prevailing wind, rain and strong sunlight.

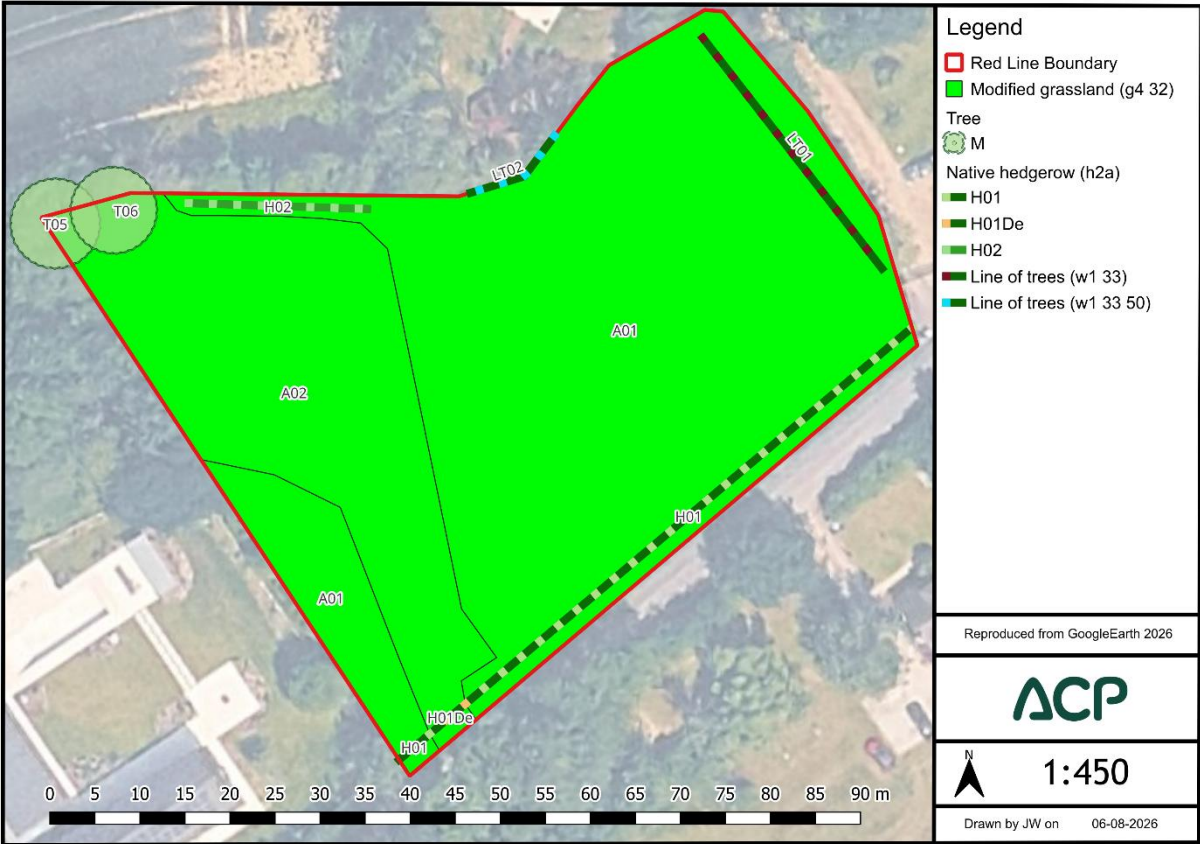
Herptiles

Proposed plans indicate creation of log piles, which would provide refuge habitat for amphibians and reptiles.

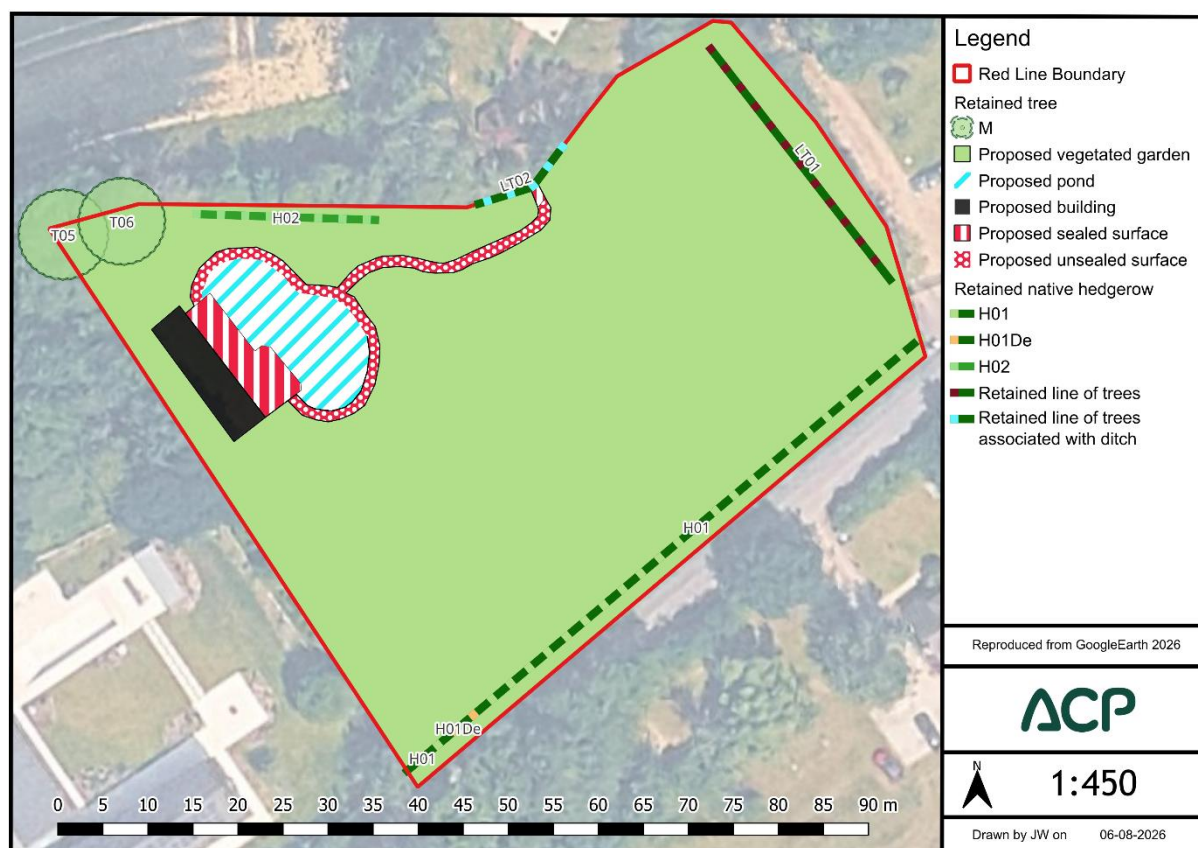
Appendix 1: Proposed Plans



Appendix 2a: Baseline Habitat Plan



Appendix 2b: Post-Development Habitat Plan



Appendix 3: Headline BNG Results

On-site baseline	Area habitat units	1.21		
	Hedgerow units	0.59		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	1.14		
	Hedgerow units	0.59		
	Watercourse units	0.00		
On-site net change (units & percentage)	Area habitat units	-0.07	-5.85%	On-site net gain is less than target set ▲
	Hedgerow units	0.00	-0.55%	On-site net gain is less than target set ▲
	Watercourse units	0.00	0.00%	
Off-site baseline	Area habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	Area habitat units	0.00	0.00%	
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-0.07		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	Area habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-0.07		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-5.85%		Total net gain achieved is less than target set ▲
	Hedgerow units	-0.55%		Total net gain achieved is less than target set ▲
	Watercourse units	0.00%		
Trading rules satisfied?	No - Check Trading Summaries ▲			
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	1.21	1.33	0.19
Hedgerow units	10.00%	0.59	0.65	0.06
Watercourse units	10.00%	0.00	0.00	0.00
No additional watercourse units required to meet target ✓				
Input errors/rule breaks present in metric ▲				

Appendix 4: Baseline Condition Assessment Sheets

Habitat Description			
Modified grassland (A01)			
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.	No	
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.	Yes	
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.	Yes	
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.	No	
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	Yes	
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes	
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Yes	
Essential criterion achieved (Yes or No)			No
Number of criteria passed			5
Condition Assessment Result (out of 7 criteria)	Condition Assessment Score	Score Achieved x/√	
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)	X	

Hedgerow favourable condition attributes														
Attributes and functional groupings (A, B, C, D and E)		Criteria - the minimum requirements for 'favourable condition'	Criteria description	Habitat parcel reference										Notes (such as justification)
				Grid reference										
				H01	H02									
Core groups - applicable to all hedgerow types				Criterion passed (Yes or No)										
A1.	Height	>1.5 m average along length	The average height of woody growth estimated from base of stem to the top of the shoots, excluding any bank beneath the hedgerow, any gaps or isolated trees. Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice). A newly planted hedgerow does not pass this criterion (unless it is >1.5 m height).	Yes	Yes									
A2.	Width	>1.5 m average along length	The average width of woody growth estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths (such as blackthorn <i>Prunus spinosa</i> suckers) are only included in the width estimate when they are >0.5 m in height. Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice).	Yes	Yes									
B1.	Gap - hedge base	Gap between ground and base of canopy <0.5 m for >90% of length	This is the vertical 'gappiness' of the woody component of the hedgerow, and its distance from the ground to the lowest leafy growth. Certain exceptions to this criterion are acceptable (see page 65 of the Hedgerow Survey Handbook).	Yes	Yes									
B2.	Gap - hedge canopy continuity	Gaps make up <10% of total length; and No canopy gaps >5 m	This is the horizontal 'gappiness' of the woody component of the hedgerow. Gaps are complete breaks in the woody canopy (no matter how small). Access points and gates contribute to the overall 'gappiness' but are not subject to the >5 m criterion (as this is the typical size of a gate).	Yes	Yes									
C1.	Undisturbed ground and perennial vegetation	>1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length; Measured from outer edge of hedgerow; and Is present on one side of the hedgerow (at least).	This is the level of disturbance (excluding wildlife disturbance) at the base of the hedgerow. Undisturbed ground is present for at least 90% of the hedgerow length, greater than 1 m in width and must be present along at least one side of the hedgerow. This criterion recognises the value of the hedgerow base as a boundary habitat with the capacity to support a wide range of species. Cultivation, heavily trodden footpaths, poached ground etc. can limit available habitat niches.	No	No									
C2.	Nutrient-enriched perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground.	The indicator species used are nettles <i>Urtica</i> spp., cleavers <i>Galium aparine</i> and docks <i>Rumex</i> spp. Their presence, either singly or together, does not exceed the 20% cover threshold.	No	Yes									
D1.	Invasive and neophyte species	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of VCA) and recently introduced species.	Recently introduced species refer to plants that have naturalised in the UK since AD 1500 (neophytes). Archaeophytes count as natives. For information on archaeophytes and neophytes see the JNCC website ⁵ , as well as the BSBi website ⁶ where the 'Online Atlas of the British and Irish Flora' contains an up-to-date list of the status of species. For information on invasive non-native species see the GB Non-Native Secretariat website ⁷ .	Yes	Yes									
D2.	Current damage	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities.	This criterion addresses damaging activities that may have led to or lead to deterioration in other attributes. This could include evidence of pollution, piles of manure or rubble, or inappropriate management practices (for example, excessive hedgerow cutting).	Yes	Yes									
Additional group - applicable to hedgerows with trees only														
E1.	Tree class	There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and or ancient ⁸), and there is on average at least one mature, ancient or veteran tree present per 20 - 50m of hedgerow.	This criterion addresses if there are a range of age-classes or morphologies which allow for replacement of trees and provide opportunities for different species.											
E2.	Tree health	At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	This criterion identifies if the trees are subject to damage which compromises the survival and health of the individual specimens.											
The hedgerow condition assessment generates a weighting (score) ranging from 1 - 3, which is used within the Statutory Biodiversity Metric. The scores for each are set out in the tables below.														
Condition categories for hedgerows without trees														
Category	Category Requirements		Metric Score	Score achieved										
Good	No more than 2 failures in total; AND No more than 1 failure in any functional group.		3											
Moderate	No more than 4 failures in total; AND Does not fail both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and C2 = Moderate condition).		2											
Poor	Fails a total of more than 4 attributes; OR Fails both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).		1											
Score achieved:														

Habitat Description														
Line of trees (LT01) Line of trees associated with ditch (LT02)														
See the Statutory Biodiversity Metric User Guide. This assessment is based on the Hedgerow Survey Handbook ¹ . For further clarifications please refer to the Handbook. Where ancient and veteran trees are present within the line of trees, see Footnote 2 for standing advice.														
On-site or off-site, site name and location		Survey date and Surveyor name												
		Survey reference (if relating to a wider survey)												
Limitations (if applicable)		Habitat parcel reference												
		LT01	LT02											
		Grid reference												
Condition Assessment Criteria		Criterion passed (Yes or No)												Notes (such as justification)
A	At least 70% of trees are native species.	Yes	Yes											
B	Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.	Yes	Yes											
C	One or more trees has veteran features and or natural ecological niches for vertebrates and invertebrates, such as presence of standing and attached deadwood, cavities, ivy or loose bark.	No	Yes											
D	There is an undisturbed naturally-vegetated strip of at least 6 m on both sides to protect the line of trees from farming and other human activities (excluding grazing). Where veteran trees are present, root protection areas should follow standing advice ² .	No	No											
E	At least 95% of the trees are in a healthy condition (deadwood or veteran features valuable for wildlife are excluded from this). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	Yes	Yes											
Number of criteria passed		3	4											
Condition Assessment Result (out of 5 criteria)		Condition Assessment Score												
Passes 5 criteria		Good (3)												
Passes 3 or 4 criteria		Moderate (2)												
Passes 2 or fewer criteria		Poor (1)												

Appendix 5: Relevant Legislation & Policy

Environment Act (2021)

Effective 2024, the statutory mandate for Biodiversity Net Gain (BNG), as established by Schedule 14 of the Environment Act 2021, requires all developments subject to Schedule 7A of the Town and Country Planning Act 1990 to provide a minimum +10% gain in biodiversity value. This requirement is a mandatory condition of planning permission, applicable to all new developments except those expressly excluded under the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

Pursuant to the statutory framework established by Schedule 14 of the Environment Act 2021, every grant of planning permission is subject to a biodiversity gain condition under Schedule 7A of the Town and Country Planning Act 1990. This condition mandates that the biodiversity gain objective be satisfied via a minimum +10% net increase in biodiversity value relative to the pre-development baseline. This requirement serves as a condition precedent; accordingly, a Biodiversity Gain Plan must be submitted to and discharged by the Local Planning Authority (LPA) in writing prior to the commencement of development. Any material operations initiated in the absence of such approval shall constitute a breach of planning control under Section 171A of the Town and Country Planning Act 1990.

Statutory provision requires that significant on-site biodiversity enhancements be maintained for a duration of no less than 30 years following the development's conclusion. This requirement is satisfied through the imposition of a planning condition, a planning obligation, or a conservation covenant. Under the Town and Country Planning Act 1990, LPAs are empowered to utilise section 106 (s106) agreements to facilitate the delivery of on-site enhancements, the transfer of registered off-site biodiversity gains, or the use of statutory credits, while ensuring compliance through rigorous monitoring and reporting frameworks.

National Planning Policy Framework (NPPF; 2025)

The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. Paragraphs 187 to 201 of the NPPF outline measures to conserving and enhancing the natural environment. Notably, Paragraph 192 states that to protect and enhance biodiversity, plans should *'identify and pursue opportunities for securing measurable net gains for biodiversity'*.

BNG Regulations

The Biodiversity Gain Requirements (Exemptions) Regulations 2024

These Regulations, which apply in England only, exempt certain developments from meeting the biodiversity gain requirement that would otherwise be imposed as a general condition of planning permission. The exemptions in these Regulations relate to:

- small developments where an application for planning permission is made or has been granted before April 2024,
- developments with no impact on priority habitat and where impacts on other habitat fall below specified thresholds,
- householder applications,
- the high-speed railway network,
- off-site gain developments i.e. developments which fulfil the biodiversity net gain requirement arising in relation to another development, and
- certain self-build and custom build developments.

The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024

Schedule 7A to the Town and Country Planning Act 1990 makes provision for grants of planning permission in England to be subject to a condition to secure that a biodiversity gain objective is met. These Regulations define “irreplaceable habitat” for the purposes of Schedule 7A of the Town and Country Planning Act 1990 and modify its application in respect of habitat falling within the definition. Under the revised terms, the mandatory biodiversity gain percentage is waived. In its place, alternative provisions are required to mitigate the adverse effects of development on onsite habitats classified as irreplaceable. Phased developments are excluded from these modifications. Equivalent requirements for such developments are instead governed by regulations made under Schedule 7A, paragraph 19 of the Town and Country Planning Act 1990.

The Biodiversity Gain Site Register Regulations 2024

These Regulations make provision for and in relation to a register of biodiversity gain sites (“the biodiversity gain site register”). “Biodiversity gain site” is defined in section 100(2) of the Environment Act 2021. These Regulations implement the biodiversity gain requirements of Schedule 7A to the Town and Country Planning Act 1990. The core objective is to ensure that the post-development biodiversity value exceeds the pre-development value by at least +10%. This calculation incorporates both onsite habitat value and any allocated enhancements officially recorded in the biodiversity gain site register

The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2024

These Regulations make provision in connection with the biodiversity gain site register established under the Biodiversity Gain Site Register Regulations 2024 and maintained by Natural England as the designated register operator under those Regulations. Under Regulations 3 through 11, the register operator may impose a financial penalty of £5,000 for the submission of false or misleading data in connection with land registration applications. In line with the Biodiversity Gain Site Register Regulations 2024, this penalty is applied based on the balance of probabilities. The enforcement process provides a statutory window for the recipient to lodge an objection.

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