Biodiversity Net Gain Assessment
Land at Streetly Hall Farm, West Wickham

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Client	Cornerstone Planning on behalf of Christopher Covey
Site address	Land at Streetly Hall Farm, West Wickham, CB21 4RR
Survey scope	Biodiversity Net Gain (BNG) Management Plan
Survey date(s)	Preliminary Phase 1 habitat survey: 21/08/2023 UKHab and BM4.0 condition assessment: 21/08/2023
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19/10/2023	Issued by BM
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Declaration of Compliance

This report has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct and British Standard Institution's (BSI) BS 8683:2021 *Biodiversity – Process for designing and implementing Biodiversity Net Gain – Specification*. We confirm that the opinions expressed within this document are our bona fide professional opinions.

The information which is being provided is a true representation of the survey methods used and the results assembled, with respect to the stated dates of survey and assessment. The future validity of this report is conditional on any changes which occur to the assessment site, and in any case will be limited by professionally accepted survey lifespans.

Third Party Disclaimer

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Table of Contents

1. Non-Technical Summary

This report has been prepared by Norfolk Wildlife Services for Cornerstone Planning Ltd. on behalf of Chris Covey in relation to the development of a new Anaerobic Digester (AD) facility at land at Streetly Hall Farm, West Wickham.

This report provides a summary of the results of a Biodiversity Net Gain (BNG) assessment of the application listed above. The 'Biodiversity Net Gain Report & Audit Templates' by CIEEM (2021) has provided the framework for this report, and includes the feasibility and outline design stage of the BNG process.

Habitats within the survey area have been classified using the UK Habitat Classification v.1.0, and the fieldwork was carried out on 18/09/2022 by Ben Moore ACIEEM.

Biodiversity Metric 4.0 has been used to calculate the habitat and hedgerow units pre- and post-development. The metric calculations for the proposed development site baseline, and the recommendations to achieve a 10.63% net gain for habitat units on site, have been provided. Re-assessment of the calculations will be required if alterations to the site design would result in a change of habitat areas.

The net gains in biodiversity units shown to be achievable as part of this development meet the current requirements of the national policy (NPPF) and exceeds the Government's mandating of BNG at a minimum of 10% through the Environment Bill as proposed by early 2024.

Based on the low complexity of the habitats currently present on the site and the modest difficulty of the on-site habitat and hedgerow changes, it is considered that there is a very low risk of the proposal not achieving an overall net gain in biodiversity units.

An outline Management and Monitoring Plan has been provided within this report. For the MMP to succeed, the Principal Contractor (yet to be determined) will need to ensure the following documents are provided: detailed landscape planting schedules, management proposals, a construction handover checklist, a timetable for implementation and specified persons responsible for activities.

2. Introduction

2.1. Description of the project

This report has been prepared by Norfolk Wildlife Services for Cornerstone Planning Ltd. on behalf of Chris Covey, in relation to the development of an Anaerobic Digester (AD) facility on land at Streetly Hall Farm, West Wickham, Cambridgeshire.

A previous Ecological Impact Assessment (EcIA) was produced in 2022 and updated in 2023 with updated plans (NWS, 2023). This EcIA report included a brief Biodiversity Net Gain (BNG) assessment where pre- and post-construction biodiversity units were provided to show how the development can achieve a minimum 10% BNG.

The report provides a summary of these BNG results, the appropriate management prescriptions, monitoring and remedial measures to ensure that the BNG recommendations are achieved over the duration of the commitment. The 'Biodiversity Net Gain Report & Audit Templates' by CIEEM (2021) has provided the framework for this report, and includes the feasibility and outline design stage of the BNG process.

2.2. Purpose

The purpose of this report is to:

- Classify the ecological baseline of the survey area (as shown in Figure 3) according to habitat type, distinctiveness and strategic significance;
- Ensure the habitats classified within the survey area are supported by the best available data at the time of assessment;
- Identify the data collection methods and all potentially significant limitations to survey results and assessment;
- Calculate baseline pre- and post-development BNG units for the site based on current development proposals;
- Provide an on-site BNG strategy with the aim of providing a net gain in units through habitat creation/enhancement/succession;
- Provide an assessment of the feasibility of providing a 10% net gain from the development, by way of off-site delivery of habitat units;
- Set out any requirement for post-development monitoring.

2.3. Relevant Legislation and Policy Guidance

2.3.1. Biodiversity Net Gain

Biodiversity Net Gain (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' (CIEEM, 2016). The 'Biodiversity Net Gain Report & Audit Templates' by CIEEM (2021) has provided the framework for this report, and includes the feasibility and design stage of the BNG process.

BNG does not replace or supersede legislation of protected or valued habitats and species, nor the requirements of the ecological impact assessment process.

2.3.2. Good Practice Principles

Good practice principles for biodiversity net gain are set out within Table 1.1 of Biodiversity Net Gain: Good Practice Principles for Development (CIEEM, 2019). Key principles include:

- Apply the 'Mitigation Hierarchy' provided by the CIEEM Guidelines for Ecological Impact Assessment (CIEEM, 2018) and be 'additional' by achieving outcomes that exceed existing obligations;
- Avoid losing biodiversity which cannot be off-set elsewhere (irreplaceable habitats);
- Address the inherent risk of achieving net gain;
- Make a 'measurable' net gain contribution (calculated using The Biodiversity Metric 4.0) and ensure that 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.

2.3.3. Environment Act 2021

Schedule 14 of the Environment Act 2021 makes provision for 10% biodiversity net gain to be a condition of planning permissions in England, although this is not yet mandatory.

2.3.4. Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities Act 2006 (NERC) came into force on 1 October 2006. Under Section 40 of the Act, all public bodies (including planning authorities) now have a legal duty to consider biodiversity in their work (i.e. a material consideration for planning applications).

2.3.5. The National Planning Policy Framework

The National Planning Policy Framework (NPPF, 2021) sets out the government's planning policies for England and how these are expected to be applied. Section 15: 'Conserving and enhancing the natural environment', Paragraphs 174 to 188, sets out requirements for a broad range of topics relating to the natural environment, and specifically for the delivery of biodiversity net gain (Paragraph 179[b]).

3. Methods

3.1. Desktop study

In order to inform an assessment of the strategic significance, a review of the available Local Plan documentation for South Cambridgeshire District Council was undertaken. Relevant desk study data are presented in the EcIA Report (also prepared by NWS) (NWS, 2023).

3.2. Field survey and establishment of baseline ecological conditions

The survey area was evaluated on 18/09/2022 by Ben Moore ACIEEM.

Habitat assessment of the survey area was conducted based on the UK Habitat Classification System (UKHab-Professional v1.0). Habitats within the site were mapped up to Primary Habitat Hierarchy Level 5 (where applicable), with a minimal mapping unit of 25m^2.

Secondary Code groups were used where applicable to describing the habitat: Habitat Mosaic; Habitat Complex; Origin; Management; Land Use; Environmental Qualifier; Species Feature and Hydrological Regime.

3.3. Biodiversity Metric

The BNG Good Practice Principles (CIEEM, 2019) have been applied as part of the net gain assessment for the proposal site.

3.3.1. Calculation of Biodiversity Units and Net Gain

The Biodiversity Metric 4.0 is the currently most recent and approved method for calculating the habitat values pre- and post-development.

Biodiversity net gain calculations were undertaken on 20/10/2023 by Ben Moore ACIEEM, based on the Baseline Habitat Plan (Figure 1) and proposed development plan (Figure 2).

3.3.2. Condition assessment

Habitat condition was assigned using the 'Biodiversity Metric 4.0 habitat condition assessment' Excel spreadsheet (Appendix 1 provides the criteria for all assessed habitats) and following guidance from the 'Biodiversity Metric 4.0 Technical Supplement' document (Panks *et al.*, 2023) which accompanies the Biodiversity Metric 4.0. Assessment criteria were followed for each broad habitat type, to determine the condition of each habitat for all areas surveyed.

3.3.3. Strategic significance

The strategic significance was assessed by determining if habitat areas within the site occur within any strategic locations for biodiversity, form part of a designated site for nature conservation or are identified within local plans such as Ecological Networks or stepping stone features.

3.3.4. Measurement of habitats

Baseline and proposed habitat areas have been measured as distinct habitat parcels using QGIS 3.18.3 Geographical Information System with overlaid georeferenced Google Earth Pro imagery and 2022-444-013 Landscape Proposals.

3.3.5. Limitations

There were no limitations to the assessment.

4. Baseline conditions

4.1. Habitat classification and condition assessment

No irreplaceable habitats were identified within the red-line boundary of the proposed scheme.

The proposal site consists primarily of arable land. There is no condition assessment criteria for arable land as a result arable land is automatically given the condition score 'Condition Assessment – N/A'.

4.2. Strategic significance

The proposal site is not located within or adjacent to a designed nature conservation site, nor is it functionally connected to any designated sites due being located within an intensively farmed arable landscape.

The site is concluded to be of Low Strategic Significance.

Figure 1: Baseline Habitat Plan

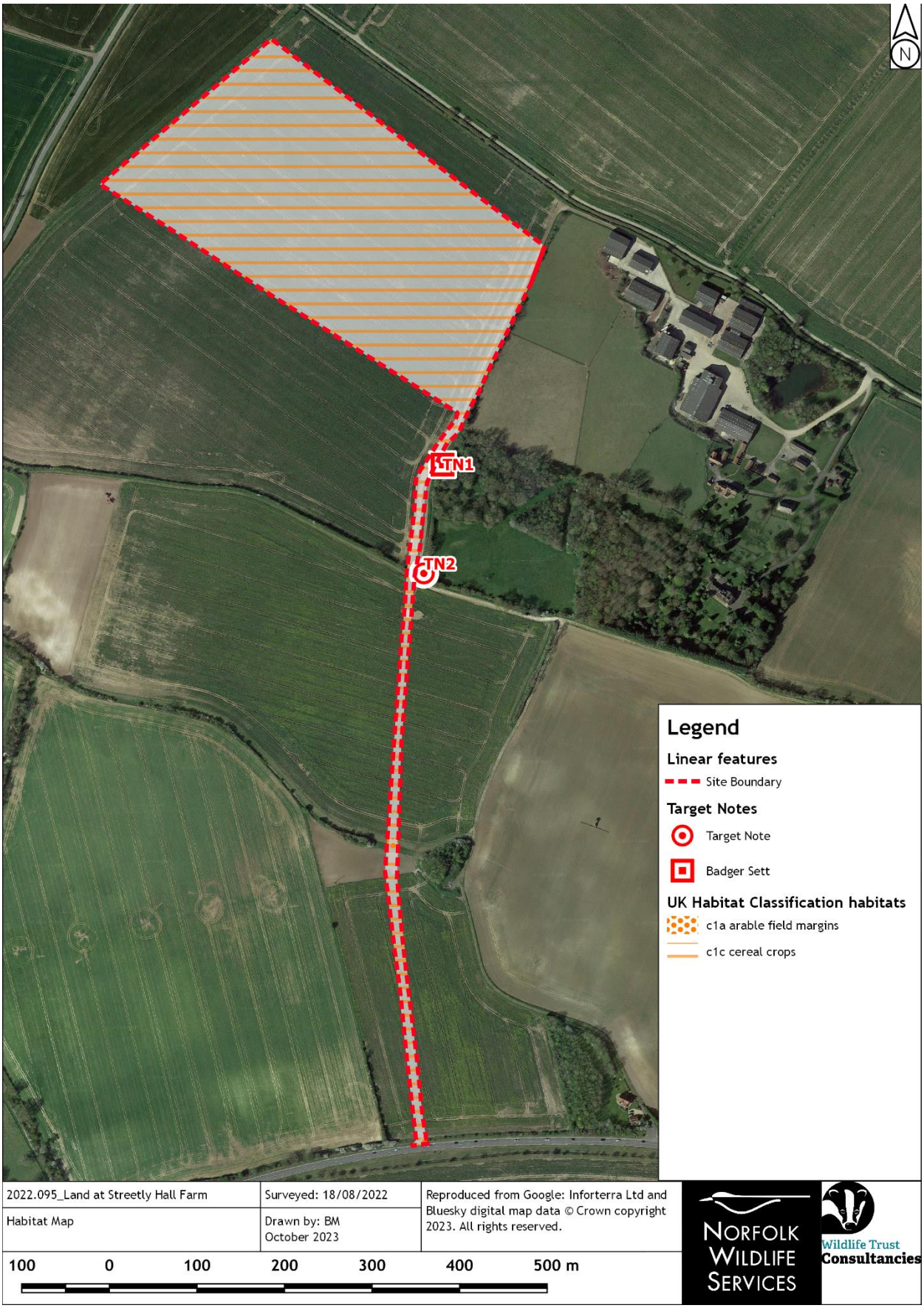

Figure 2: Development layout plan

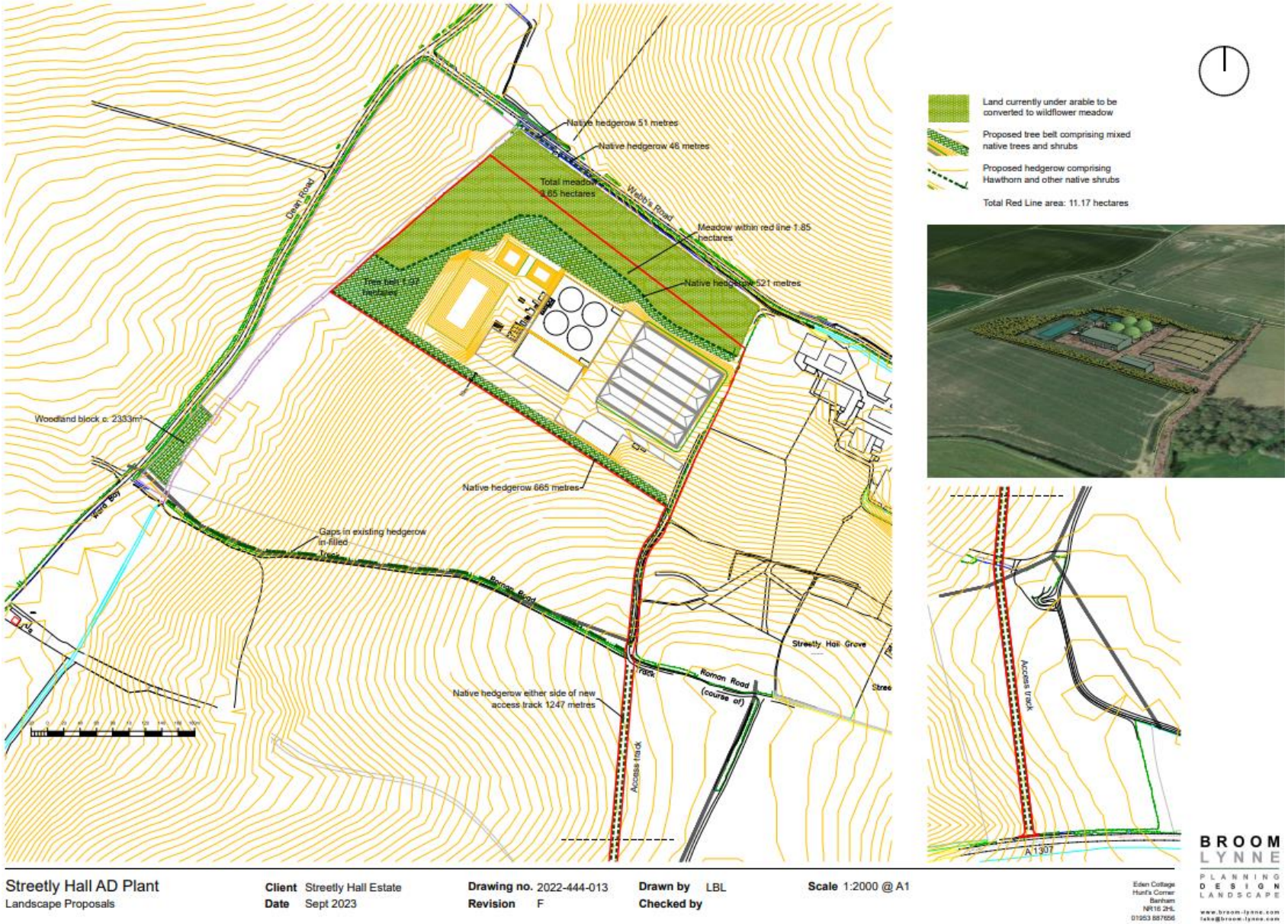

Figure 3: Proposed Habitats Plan

5. BNG Metric- on-site provision and feasibility assessment

5.1. BNG Metric calculations and trading summary

The proposed habitat measures are detailed in this Section, with the measures shown spatially in the mapped Figure 3: 'Proposed Habitats Plan'. The trading summary for BNG units for the described measures is shown in Table 2 below. Re-assessment of the calculations will be required if alterations to the site design would result in a change of habitat areas.

The proposed BNG Management and Monitoring Plan set out to achieve these measures is provided in Section 6.

BNG calculations are summarised in Section 5.2 of the EcIA report (NWS, 2023) and are also provided in Appendix 1 of this document.

Table 2: BNG Trading summary

On-site baseline	Habitat units	**22.40**
	Hedgerow units	**0.00**
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	**24.78**
	Hedgerow units	**0.00**
On-site net % change (Including habitat retention, creation & enhancement)	Habitat units	**10.63%**
	Hedgerow units	**0.00%**
Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	**2.38**
	Hedgerow units	**0.00**
Trading rules Satisfied?	**Yes**	

5.2. Proposed on-site habitat measures

The majority of the site will be converted and developed land (7.35ha) with an area of tree planting (1.97ha) and area of other neutral grassland (1.85ha).

The woodland block and trees planted (1.97ha) will be managed to 'moderate' condition within 15 years. This area will largely be used as screening for the AD plant.

The other neutral grassland (meadow) will be sown with grasses (1.85ha) and will be managed to a 'good' condition in ten years.

5.3. Proposed on-site hedgerow measures

Whilst the landscaping plan (Figure 2) details new hedgerow planting, this is not being included within the BNG requirement.

5.4. Summary of on-site BNG measures

The proposed habitat measures provided with the development would result in a net gain of 10.63% (or 2.38 habitat units).

The net gains in biodiversity units shown to be achievable as part of this development meet the current requirements of the national policy (NPPF) and will exceed the Government's mandating of BNG at a minimum of +10% through the Environment Bill as proposed by start of 2024.

5.5. Feasibility assessment

The on-site net change in habitat units exceeds the target 10% net gain (10.63%). Based on the low – medium distinctiveness baseline habitats the trading rules are satisfied as proposed habitats are considered medium distinctiveness.

Based on the limited complexity of the habitats present on the site and the modest difficulty of the on-site habitat and hedgerow changes, it is considered that there is a very low risk of the proposal not achieving an overall net gain in biodiversity units.

5.6. Applying the mitigation hierarchy

Table 3: Applying the mitigation hierarchy

Stage	Application to proposal site
1 Avoidance	The proposal site will avoid significant biodiversity impacts to the boundary hedgerows and trees. There is no alternative site currently available to the developer suitable for the proposal. To not use the site would be a missed opportunity for the developer, local housing, and employment opportunities, and would result in only a very minor avoidance of harm to biodiversity given the current baseline habitats and limited scope for protected species.
2 Minimisation	The site boundary hedgerow will be excluded from the development to avoid potential impacts. The minimisation of potential biodiversity impacts is summarised in the Ecological Management Plan Report for the project. The potential for impacts to protected species and valued habitats is considered to be low, but Best Practice avoidance measures have been provided for potential species-specific impacts.
3 Compensation	The provision of higher quality habitats than those lost, along with the enhancement and creation of native species hedgerows, will provide an overall net gain above and beyond what is strictly required to achieve a biodiversity net gain.

5.7. BNG Management and Monitoring Plan (MMP)

5.7.1. Implementation of the Proposed Habitats Plan/MMP

For the MMP to succeed, the Principal Contractor (yet to be determined) will need to ensure the following documents are provided (this can be provided in advance through a BNG Implementation Plan) alongside this report: detailed landscape planting schedules, management proposals, a construction handover checklist, and a timetable for implementation, and should specify those responsible for activities.

5.7.2. Grassland areas

The areas marked out as 'meadow within red-line boundary' in the Landscaping Plan will be prepared and sown with 'EM3 – SPECIAL GENERAL PURPOSE MEADOW MIXTURE' by Emorsgate Seeds, or with a justifiable alternative seed mix containing a similar mixture of native species. The area will be managed (by following the management plan set out in Table 4) to provide a grassland in better condition than the area lost.

The following guidance will be followed (along with the seed manufacturer's specifications) for sowing the seed and establishing the wildflower areas.

- Preparation of the ground will involve removing all weeds and existing grass using repeated cultivation.
- The soil should then be harrowed or raked to produce a medium tilth.
- Sowing will take place during autumn or spring.
- The seed must be surface sown and can be applied by machine or broadcast by hand.
- To aid consistent seed sowing, it is recommended to mix the seed with sand or sawdust.
- The ground should be firmed down after sowing with a roll or by treading to give good soil/seed contact.
- Mow regularly to a height of 40-60mm throughout year 1 (and year 0 if spring sown).
- Ideally collect and remove cutting arisings, or mow frequently enough to disperse the cuttings thinly.

5.7.3. Tree planting

All plants are to be supplied in accordance with BS4428/JCLI/CPSE Code of Practice for Handling and Establishing Landscape Plants and BS8545.

Tree planting will take place within the site during landscaping. Should this take place prior to the completion of construction activities, newly planted trees will be protected by appropriate exclusion fencing.

Planting method

Unloading and temporary storage

- The site must be ready to receive stock, with an appropriate holding site giving shelter and protection away from possible contamination.
- Off-loading will be safe, logical and efficient. Trees will not be rolled or dropped.
- The time that trees/shrubs are left on lorries during loading, transit, and unloading should be kept to a minimum.
- A quality check will be undertaken as the stock is being unloaded.
- All trees will be labelled indicating species, size, suppliers name and customer's name.
- Any unsuitable plant material should be rejected and reported to the dispatching nursery immediately.
- The length of time held in temporary storage will be kept to a minimum.

Planting

- The existing top vegetation on the planting site will be removed.
- The preparation of planting pits, bed or trenches shall comply with the appropriate British Standards, namely BS4043, BS4428, BS5837 and BS8545.
- All trees/shrubs shall be planted with the plants put into the ground at the same depth at which they had been previously grown in the nursery or container.
- The planting hole for trees is to be dug with the base of the pit being undisturbed (unless waterlogging is likely). The planting hole will be excavated approximately 150mm wider than the root ball.

- A layer of planting mixture will line the planting hole approximately 70mm deep and fill the space between the root ball and sides of the hole.
- Planting separation distance will be calculated by adding the predicted mature height of the shrub with the adjacent shrub's mature height and divided by three.
- Planting will take place during the dormant season for bare-root plants, or else can be carried out all year round for container-grown plants.
- A mulch layer, extending 1m across to a depth of 100mm and leaving the root flare free, is to be applied to retain moisture and control weed competition.

Protection and support systems

Trees

- A spiral tree guard (600x38mm) will be wrapped around the lower stem of each tree to protect against browsing animals such as rabbits and deer.
- Double short softwood stakes (75mm Ø x 1500mm) will be driven approximately 750mm deep, avoiding the root ball and not causing damage to the root system.
- A brace will be fitted using the stakes, with adjustable rubber ties and spacer blocks firmly fixed on the windward side. The stem will be securely fitted and immobile. Monitoring and adjustment will be necessary until establishment is achieved.

Hedgerow

- Tube mesh guards will be used to protect against bark stripping and leaf-bud damage for a minimum period of 3-5 years and until the plants are well established.

5.7.4. Management prescriptions

Management actions have been set out in the following table and are detailed for five years (this schedule can be rolled-over indefinitely to ensure the prescribed habitats are adequately created). Details of the monitoring are provided in Section 5.7.5.

Table 4: Summary of management prescriptions

Ecological feature	Action	Implementation year (post development)	Timing	Details
Woodland	Scrub and ruderal vegetation management	Year 2 or 3 (depending on growth)	October - February	To control scrub and bramble development, cutting may be required. For wildlife this cutting is best done on a rotational basis so that no more than half the area is cut in any one year leaving part as an undisturbed refuge
	Replace losses	As required	October - February	Plant new woodland trees, for any losses or to increase structure and diversity as opportunities are created through long-term management and monitoring.
	Management review	Years 5, 10, 15, 20 and 25	April - September	Assessment of the woodland to ensure it is functioning/improving as expected. Review of management actions required if not performing as expected.
Grassland	Watering	As required through the growing season until established	April - September	The timing and frequency will be determined according to local weather conditions, but watering frequently during the growing season is strongly advised until plants are established
	Further weed control	As required through the growing season until established	April - September	Competition for nutrients and water should be eliminated. Weed control can be carried out by manual or chemical methods in accordance with the manufacturer's guidelines
	Cutting	Year 2 or 3 (depending on growth)	October - February	To control scrub and bramble development, cutting may be required. For wildlife this cutting is best done on a rotational basis so that no more than half the area is cut in any one year leaving part as an undisturbed refuge
	Management review	Year 5	April - September	Assessment of the grassland to ensure it is functioning as expected as a tussocky grassland. Review of management actions required if grassland is not functioning as expected. Submit a letter to LPA to comment on condition and outcome of review

5.7.5. Monitoring

Biennial monitoring (by a suitably qualified ecologist) is recommended for the first fifteen years to ensure the management prescriptions are effectively achieving the management aims and objectives. After which, a monitoring visit every 5 years is considered sufficient.

In the case that aims and objectives appear to be falling short, then this monitoring regime will ensure that management prescriptions can be altered and remedial measures put in place (if necessary) to ensure that the management objectives are met over the 30-year plan.

6. Conclusions

The Biodiversity Net Gain assessment and management plan for the proposed Anaerobic Digester plant at land at Streetly Hall Farm, West Wickham, Cambridgeshire has calculated the habitat and units pre- and post-development and made detailed recommendations to achieve net gain.

- The metric calculations have been provided for the proposed development site baseline, and the recommendations to achieve a 10.63% net gain for habitat units on-site.
- A BNG Management and Monitoring Plan to achieve these measures within the target timeframe of habitat delivery has been provided.
- The proposal exceeds the Government's mandating of BNG at a minimum of 10% through the Environment Bill as proposed by start-2024.
- Based on the limited complexity of the habitats present on the site and the modest difficulty of the on-site habitat and hedgerow changes, it is considered that there is a very low risk of the proposal not achieving an overall net gain in biodiversity units.
- For the Management and Monitoring Plan to succeed, the Principal Contractor (yet to be determined) will need to ensure the following documents are provided alongside this report: detailed landscape planting schedules, management proposals, a construction handover checklist, a timetable for implementation and a specification of those responsible for activities. This can be provided in advance through a BNG Implementation Plan.

6.1. Bibliography

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Appendix 1: Biodiversity Metric 4.0 calculations

Project Name: Proposed AD plant, Land at Streetly Hall Farm, West Wickham,

A-1 On-Site Habitat Baseline

Condense / Show Columns | Condense / Show Rows | Main Menu | Instructions

Area habitat summary	
Total Net Unit Change	2.38
Total Net % Change	10.63%
Trading Rules Satisfied	Yes ✓

	Existing area habitats			Distinctiveness	Condition	Strategic significance	Required Action to Meet Trading Rules	Ecological baseline	Retention category biodiversity value					
Ref	Broad Habitat	Habitat Type	Area (hectares)	Distinctiveness	Condition	Strategic significance		Total habitat units	Area retained	Area enhanced	Baseline units retained	Baseline units enhanced	Area habitat lost	Units lost
1	Cropland	Cereal crops	11.14	Low	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	Same distinctiveness or better habitat required ≥	22.28			0.00	0.00	11.14	22.28
2	Grassland	Other neutral grassland	0.03	Medium	Poor	Area/compensation not in local strategy/ no local strategy	Same broad habitat or a higher distinctiveness habitat required (≥)	0.12			0.00	0.00	0.03	0.12
3														
4														
5														
6														
		Total habitat area	11.17					22.40	0.00	0.00	0.00	0.00	11.17	22.40
		Site Area (Excluding area of Individual trees and Green walls)	11.17											

Total area lost (excluding area of Individual trees and Green walls)	11.17

e: Proposed AD plant, Land at Streetly Hall Farm, West Wickham, Cambridgeshire Map

A-2 On-Site Habitat Creation

Condense / Show Columns | Condense / Show Rows | Main Menu | Instructions

Area habitat summary	
Total Net Unit Change	2.38
Total Net % Change	10.63%
Trading Rules Satisfied	Yes ✓
Area Check (excluding individual trees and green walls)	Area Acceptable ✓

Post development/ post intervention habitats											Comments	
Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness	Condition	Strategic significance	Temporal multiplier		Difficulty multiplier	Habitat units delivered		User comments	Consenting body comments
			Distinctiveness	Condition	Strategic significance	Standard or adjusted time to target condition	Final time to target condition (years)	Final difficulty of creation				
Urban	Developed land; sealed surface	7.35	V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	0	Medium	0.00			
Woodland and forest	Other woodland; broadleaved	1.97	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	15	Low	9.24			
Grassland	Other neutral grassland	1.85	Medium	Good	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	10	Low	15.55			
	Total habitat area	11.17							24.78			
	Site Area (Excluding area of Individual trees and Green walls)	11.17										

Proposed AD plant, Land at Streetly Hall Farm, Wes				
Headline Results				
Scroll down for final results ⚠				

Return to results menu

On-site baseline	*Habitat units*	22.40	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	24.78	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	*Habitat units*	2.38	10.63%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Off-site baseline	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	*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)	*Habitat units*	2.38	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	*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)	*Habitat units*	2.38
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	10.63%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Habitat units	10.00%	22.40	24.64	0.00	Unit requirement met or surpassed ✓
Hedgerow units	10.00%	0.00	0.00	0.00	Unit requirement met or surpassed ✓
Watercourse units	10.00%	0.00	0.00	0.00	Unit requirement met or surpassed ✓