Biodiversity Net Gain

Land at Maple Park

Falconer Road, Haverhill

Suffolk

Client: Hunt Developments Group Ltd

Project Ref: TE/LB/2025_782

Revision: FINAL

Issue date: 23rd April 2025

Torc Ecology Ltd
Registered number 6471219 VAT number 926 5906 96
The Office, 14 Park Hill, Dersingham, King's Lynn, Norfolk PE31 6NE
Tel: 01485 524950 Web: www.torcecology.co.uk Email: info@torcecology.co.u

Client	Hunt Developments Group Ltd
Site	Land at Maple Park, Falconer Road, Haverhill, Suffolk
Report Reference	2025_782/2
Author	Louise Brown MCIEEM Consultant Ecologist
Technical Review	Shaun Baker MCIEEM Principal Ecologist
Approved	Shaun Baker MCIEEM Principal Ecologist
Date	23rd April 2025
Version	DRAFT

This Biodiversity Net Gain report has been prepared by Torc Ecology Ltd for the sole and exclusive use of Hunt Developments Group Ltd in response to their particular instruction.

This report has been prepared in accordance with The Statutory Biodiversity Metric User Guide (DEFRA, 2024) and Biodiversity Net Gain. Good Practice Principles for Development (Baker, et. al. 2019).

CONTENTS

1. Executive summary 4

2. Introduction 5

3. Methodology 5

4. Results 6

5. Conclusion 9

6. References 10

APPENDICES

APPENDIX I: Figure 1: Baseline Habitat Map 11

Figure 2: Proposed Habitat Map 12

APPENDIX II: Condition Assessment sheets 13

APPENDIX III: Biodiversity Net Gain and Planning Policy 19

APPENDIX IV: Biodiversity Net Gain. Good Practice Principles for Development 21

1. EXECUTIVE SUMMARY

1.1. Torc Ecology Ltd was commissioned by Hunt Developments Group Ltd. in February 2025 to undertake an Ecological Impact Assessment and a Biodiversity Net Gain assessment of a proposed development to install 26 shipping containers upon land within the curtilage of Maple Park, a light industrial warehouse unit within a business park on the southeast outskirts of Haverhill.

1.2. The site comprises approximately 596.9m² / 0.059 hectares including a roadside verge and part of an ascending bank of hawthorn scrub and individual urban trees. All habitats will be removed and the bankside cut into and levelled to facilitate the installation of the containers; a small area of hardstanding will also be installed in front of the containers for parking.

1.3. All habitats are to be lost to the development with limited scope for biodiversity net gain. Therefore biodiversity net gain will be achieved by enhancing offsite scrub and by tree planting upon offsite land but within the same ownership at Maple Park.

1.4. The following table outlines the results of a Biodiversity Net Gain calculation undertaken of the site using DEFRA's Statutory Biodiversity Metric Calculation Tool V4.0:

Considerations	Description	Comments
Biodiversity Evaluation	Pre and post-development scenarios were measured using the Defra Biodiversity Metric Calculation Tool version 4.0. (July 2024)	All Trading Rules have been met.
Biodiversity Value	Baseline habitats	The site comprised ruderal/ephemeral habitat, hawthorn scrub and individual urban trees. Baseline habitats were valued at **0.21 Biodiversity Units (BUs)**.
	Proposed development	All habitats are to be lost and replaced with developed land; sealed surface resulting in a deficit of **minus 0.21 habitat BUs (100% deficit).** Offsite encroaching bramble scrub **(0.14 habitat BUs)** will be managed and enhanced with mixed scrub planting totaling **+ 0.34 habitat BUs.** Four individual trees will also be planted creating **+ 0.05 habitat BUs.** This will provide a net change of **+ 0.25 offsite habitat BUs.**
Biodiversity Impacts	Calculations show a predicted gain in habitat and hedgerow biodiversity units.	Measured in DEFRA's Biodiversity Units the proposed development will have a combined net unit change of **+ 0.04 BUs** representing **+17.99% total net change.**

2. INTRODUCTION

2.1. Background information

2.1.1. Torc Ecology Ltd was commissioned by Hunt Developments Group Ltd. in February 2025 to calculate the predicted changes in biodiversity value associated with a proposed development of Land at Maple Park, Falconer Road, Haverhill, Suffolk CB9 7BG , hereafter referred to as 'the site'.

2.1.2. The site (OS Central Grid Reference TL 68155 44462) comprises 596.9m² / 0.059 hectares including a roadside verge and part of an ascending bank of hawthorn *Crataegous monogyna* scrub and urban trees. The site lies within the curtilage of Maple Park, a light industrial warehouse unit within a business park on the southeast outskirts of Haverhill. All habitats will be removed and the bankside cut into and levelled to facilitate the installation of the 26 shipping containers; a small area of hardstanding will also be installed in front of the containers for parking.

2.1.3. This report provides the baseline conditions of the site as shown in Figure 1: Baseline Habitat Map and the proposed site layout as shown in Figure 2: Post-Development Habitat Map (refer to Appendix I). A summary of the results of the net gain calculations are also provided.

2.1.4. For clarity and additional detail, where required, this report should be read in conjunction with the Ecological Impact Assessment Report (EcIA - Torc Ecology Ltd, 2025) produced for the site.

3. METHODOLOGY

3.1. Habitat mapping

3.1.1. The field survey comprised of a Phase I habitat survey of the site which included surveying for different habitats and classifying them according to the habitats given in the UK Habitat Classification (UKHab Version 2.0). Sources of information that aided the mapping process included field survey data, aerial images and a baseline survey map supplied from the client's architect. Refer to the EcIA report (Torc Ecology Ltd., 2025) for full survey methodology details.

3.1.2. Using metres as the basic unit of measurement the projection for mapping was the British National Grid Ordnance Survey OSGB 1936 (EPSG 27700). A 'Minimum Mapping Unit' of c. 25m² was applied for the purpose of mapping. Habitats were mapped by en:mapping Ltd using ESRI ArcGIS / ArcPro.

3.1.3. A condition assessment was undertaken alongside the UKHab survey. This involves assessing a series of attributes representing key physical characteristics of each habitat type. The attributes are used to assess whether the habitat is in a favourable condition. The relevant habitats present on site were assessed as in either poor, moderate or good condition, where necessary. Relevant habitats included sparsely vegetated urban land, hawthorn scrub and individual urban trees (refer to Appendix II).

3.2. Calculating Biodiversity Units

3.2.1. DEFRA's Statutory Biodiversity Metric Calculation Tool V4.0 (July 2024) was used to record baseline and post-development habitats for the purpose of determining biodiversity net gain.

3.2.2. The biodiversity baseline for the site was based on habitat types and areas, their distinctiveness and condition scores and the number of biodiversity units each type of habitat generates. Strategic Significance is determined with reference to local policies and in consultation with the Local Planning Policy (refer to Appendix III). A Local Nature Recovery Strategy has not yet been finalised for West Suffolk District although a Public Consultation draft document is available and out for consultation (Suffolk County Council, 2025). Therefore this document and the corresponding Suffolk Local Habitat Map has been referred to, as well as the list of Local Biodiversity Action Plan (LBAP) habitats for Suffolk as the key documents for assigning Strategic Significance to habitats upon the site and for offsite net gain.

3.2.3. The Biodiversity Metric Calculation Tool was undertaken in accordance with the Biodiversity Net Gain Good Practice Principles for Development (Baker, et al. 2019) as provided in Appendix IV.

3.3. Author

3.3.1. Ms Louise Brown is the author of this BNG report. Ms Brown is a Full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM) and a Consultant Ecologist at Torc Ecology Ltd. Ms Brown is an experienced field ecologist of over twenty-years' experience holding Natural England survey licences for bats (Ref: 2016-20937-CLS-CLS); great crested newts *Triturus cristatus* (Ref: 2016_27348-CLS-CLS) and barn owls *Tyto alba* (Ref: CL29/00224) as well as a Registered Consultant (RC062) on the Bat Mitigation Class Licence.

3.3.2. Ms Brown has attended a number of CIEEM approved courses in relation to biodiversity net gain, including: 'UK Habitat Classification for Biodiversity Net Gain', 'Statutory Biodiversity Metric Training', and 'QGIS for Ecologists and Conservation Practitioners'.

4. RESULTS

4.1. Baseline habitats

4.1.1. There are no irreplaceable habitats upon the site. None of the baseline habitats are categorised as being above low Strategic Significance, these habitats being of lower conservation value and not being listed as or meeting the criteria for LBAP habitats. A brief description of the onsite habitats are provided below.

Sparsely vegetated urban land, Ruderal/short ephemeral

4.1.2. The verge comprised areas of sparsely vegetated ground with ruderal and short ephemeral vegetation. Evidence of a hard substrate was visible beneath the vegetation, likely from when the industrial units were built. Species comprised occasional black knapweed *Centaurea nigra*, primrose

Primula vulgaris, meadowsweet *Filipendula ulmaria* and coltsfoot *Tussilago farfara* with bramble *Rubus fructicosa* agg. noted rarely. False oat grass *Arrhenatherum elatius* was frequent but did not constitute more than 75% of the sward and there was frequent moss *Bryophyta* sp. There was no significant number or abundance of any calcareous, acid or unimproved neutral grassland indicator species observed on site for the grassland to constitute any Section 41 habitat.

Hawthorn dominant scrub

4.1.3. Hawthorn dominant scrub was present upon the ascending bank with some willow *Salix sp*. and bramble also present. Ground flora was relatively sparse with sycamore *Acer pseudoplatanus* saplings as well as herb Robert *Geranium robertianum*, lords and ladies *Arum maculatum* and a brome *Bromus* sp. grass

Individual urban trees

4.1.4. There were five self-set semi-mature trees present upon the verge. Species included willow, alder *Alnus glutinosa* and a sycamore. Two of the willows were below 7.5cm DBH and were excluded from the biodiversity net gain assessment.

4.1.7. A baseline biodiversity map showing the existing habitats across the site is provided in Figure 1 (Appendix I). The habitat types are also presented in the table below. The values presented are taken from DEFRA's Statutory Biodiversity Metric Calculation Tool. Condition Assessments for all habitats are provided in Appendix II.

Table 1: Onsite Habitat Baseline

Habitat Type and UKHab code	Area (ha)	Ecological Baseline Habitat Units (BUs)	Comments
Hawthorn scrub (h3f)	0.02012	0.08	All habitats and habitat BUs are to be lost to the development.
Ruderal/short ephemeral (u1f, 81)	0.03957	0.08	
Individual urban trees x 3 (u,32)	0.0489	0.05	
Total BUs		**0.21**	

4.2. Post-development habitats

Onsite

4.2.1. Post-development the site will comprise the 26 shipping containers and an area of hard standing for parking.

Table 2: Onsite Habitat Creation

Habitat Type and UKHab code	Area (ha)	Ecological Baseline Habitat Units (BUs)	Comments
Developed land;sealed surface (u1b5) (Containers)	0.04187	0.00	**100% deficit in BUs.**
Developed land;sealed surface (u1b) (hardstanding)	0.01782	0.00	
Total BUs		**0.00**	

4.2.2. There is a negative change in the units calculated with a deficit of minus 0.21 habitat BUs representing a minus 100% net change. There is little opportunity for biodiversity gain taking into account the scope and scale of the project. Offsite biodiversity units are therefore relied upon for delivering biodiversity net gain for the development.

Offsite

4.2.3. Part of the south and east fringes of Maple Park comprise woodland habitat that have direct connectivity to Haverhill Railway Walks Local Nature Reserve to the south. Bramble scrub is starting to encroach over an area of ephemeral / ruderal habitat upon the woodland edge approximately 20m to the east of the site and within the blue line boundary, i.e., under the same landownership. The development therefore presents an opportunity for biodiversity gain by controlling encroaching bramble and by planting replacement mixed scrub and native trees on the woodland edge. Inevitably some bramble will remain and will compliment a mixed scrub planting scheme. Species should include hawthorn, hazel Corylus avellana, gorse Ulex europaeus, dogwood Cornus sanguinea and spindle Euonymus europaeus, as well as cherry, rowan Sorbus aucuparia and silver birch Betula pendula. This complies with a potential management measure (PM04) of the Local Nature Recovery Strategy by facilitating development of connected, shrub-rich, and structurally complex woodland understories.

4.2.4. Additional ecological enhancement measures for bats and birds have been included within a separate Ecological Constraints and Opportunities Plan (refer to the Ecological Impact Assessment Report, Torc Ecology Ltd, 2025).

4.2.6. The Post-Development Habitat map is provided in Figure 2 (Appendix I) The post-development habitat types are presented in the table overleaf. The values presented are taken from DEFRA's Statutory Biodiversity Metric Calculation Tool.

Table 4: Post-development Offsite Habitat Baseline and Habitat Creation and Enhancement

Offsite habitat baseline	**Area (ha)**	**Ecological Baseline Units (BUs)**	**Comments**
Bramble scrub (h3d)	0.0350	0.14	350m² to be reduced and controlled.
Offsite habitat enhancement and creation	**Area (ha)**	**Ecological Baseline Units (BUs)**	**Comments**
Mixed scrub (habitat enhancement)	0.0350	0.34	To be planted in areas of former bramble scrub at the woodland edge.
Native individual trees (habitat creation)	0.0163	0.05	To be planted adjacent the woodland edge.
Total BUs		**0.39**	**offsite net change of + 0.25 BUs Combined net unit change of 0.04 BUs**

5. CONCLUSION

5.1. The baseline condition of the site provides + **0.21 habitat BUs**. Post-development the proposed onsite habitats provide **0.00 Habitat BUs** which is a **minus 100% net change**. Offsite habitats to be created and enhanced will provide a net change of **+ 0.25 habitat BUs** delivering a combined net unit change of **0.04 Habitat BUs**. This represents a **17.99%** biodiversity net gain.

5.2. The assessment has confirmed the site can achieve a total project Biodiversity Net Gain above the 10% threshold. The biodiversity metric calculation spreadsheet has been provided with this report for review as required

6. REFERENCES

Baker, J., Hoskin, R. & Butterworth, T., 2019. *Biodiversity net gain. Good practice principles for development*. A practical guide, London: CIRIA.

Department for Communities and Local Government. (2022). *National Planning Policy Framework*. Department for Communities and Local Government, London.

Suffolk County Council (2025). Suffolk Local Nature Recovery Strategy. Public Consultation Draft. Suffolk County Council, Ipswich.

Torc Ecology Ltd (2025). *Ecological Impact Assessment of Land at Maple Park, Falconer Road, Haverhill, Suffolk.* Torc Ecology Ltd, King's Lynn.

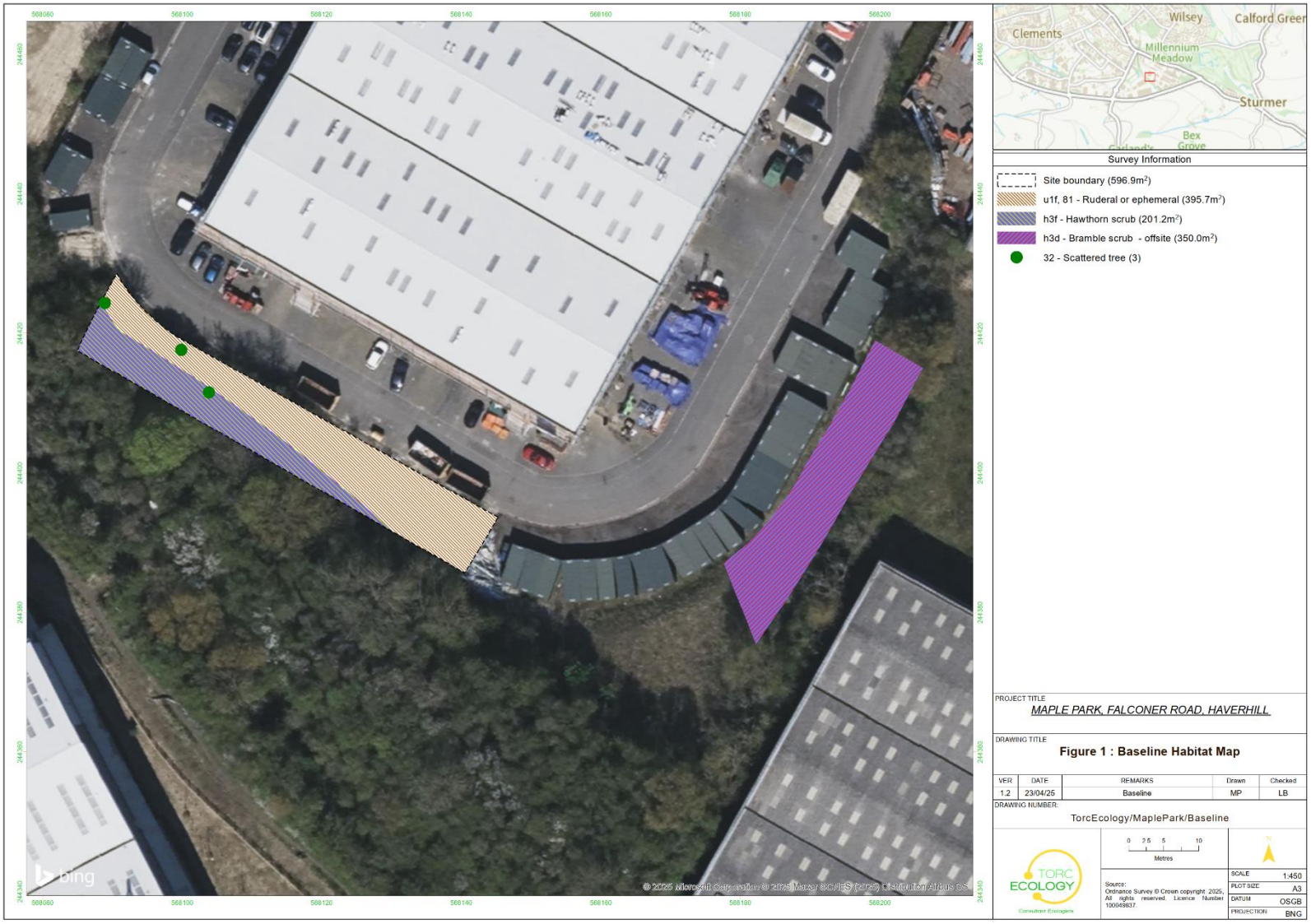
West Suffolk Council (2015). *Joint Development Management Policies Document.* West Suffolk Council, Bury St Edmunds.

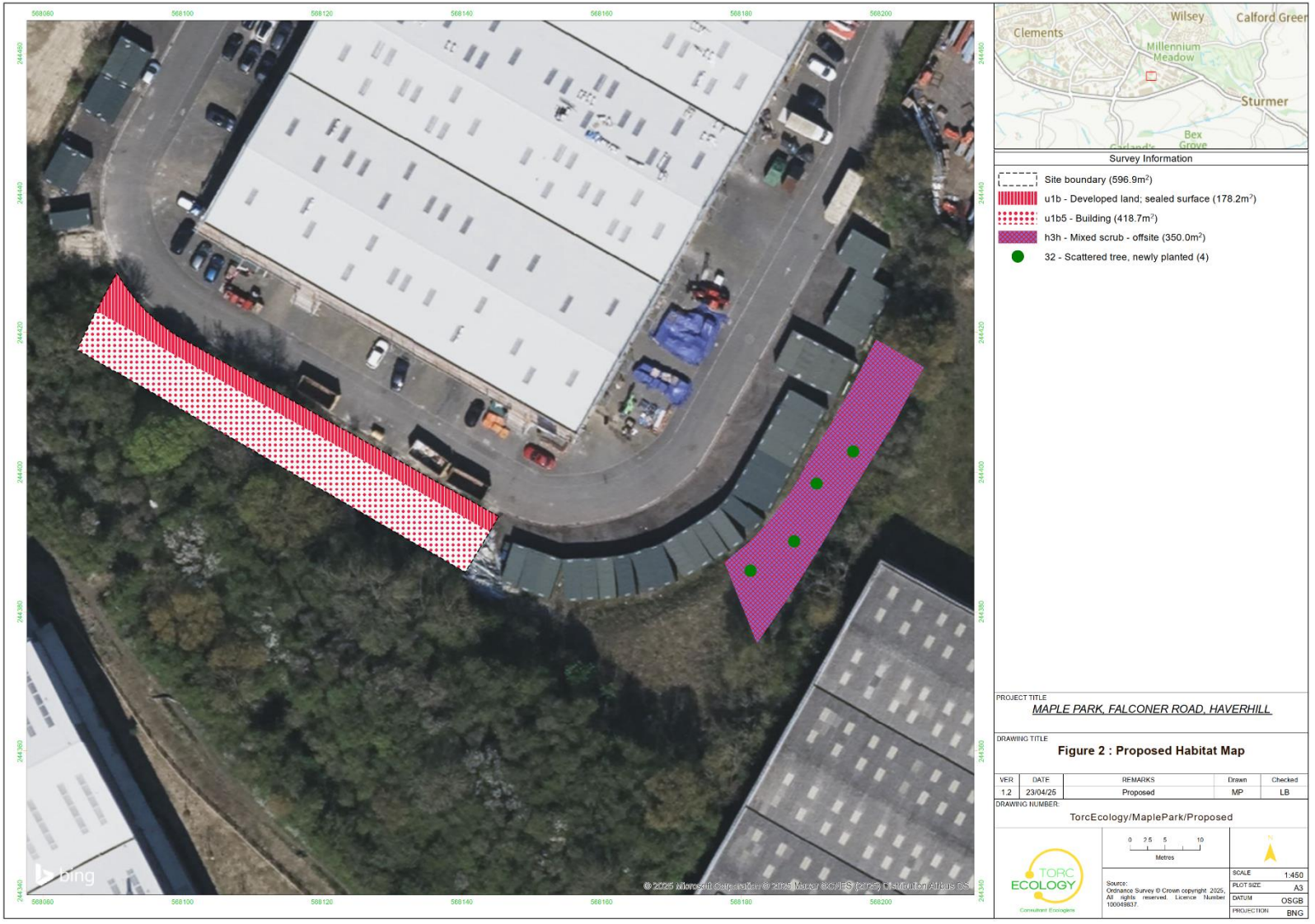
Web references

DEFRA (2024). *The Statutory Biodiversity Metric User Guide.* *https://assets.publishing.service.gov.uk/media/669e45fba3c2a28abb50d426/The_Statutory_Biodiversity_Metric_-_User_Guide__23.07.24_.pdf* DEFRA.

Suffolk Biodiversity Information Services (2025). https://www.suffolkbis.org.uk/planning/BAP (Accessed 04/2025).

.APPENDIX I: FIGURES 1 – 2




568080
568100
568120
568140
568160
568180
568200
244460
244440
244420
244400
244380
244360
bing
© 2025 Maxar Technologies © 2025 Maxar ©CNES (2025) Distribution Airbus DS
Wilsey
Calford Green
Clements
Millennium Meadow
Sturmer
Bex Grove
Survey Information
Site boundary (596.9m²)
u1b - Developed land; sealed surface (178.2m²)
u1b5 - Building (418.7m²)
h3h - Mixed scrub - offsite (350.0m²)
32 - Scattered tree, newly planted (4)
PROJECT TITLE
MAPLE PARK, FALCONER ROAD, HAVERHILL
DRAWING TITLE
Figure 2 : Proposed Habitat Map
VER
DATE
REMARKS
Drawn
Checked
1.2
23/04/25
Proposed
MP
LB
DRAWING NUMBER:
TorcEcology/MaplePark/Proposed
TORC ECOLOGY
Consultant Ecologists
0 2.5 5 10
Metres
Source: Ordnance Survey © Crown copyright 2025, All rights reserved. Licence Number 100049837
SCALE 1:450
PLOT SIZE A3
DATUM OSGB
PROJECTION BNG

APPENDIX II: CONDITION ASSESSMENTS

Condition assessment for hawthorn scrub (h3f)

Condition Sheet: SCRUB Habitat Type			
Habitat Types			
Heathland and shrub - Blackthorn scrub **Heathland and shrub - Gorse scrub** **Heathland and shrub - Hawthorn scrub** **Heathland and shrub - Hazel scrub** **Heathland and shrub - Mixed scrub** **Heathland and shrub - Dunes with sea buckthorn (H2160)** **Heathland and shrub - Willow scrub**			
Habitat Description			
Hawthorn dominant scrub. Some willow (suspected goat willow).			
For Dunes with sea buckthorn see:	Dunes with sea-buckthorn (Dunes with Hippophae rhamnoides) - Special Areas of Conservation (jncc.gov.uk)		
For other scrub types see:	ukhab – UK Habitat Classification		
On-site or off-site, site name and location	Onsite. Land at Maple Park, Falconer Road, Haverhill, Suffolk CB9 7BG	**Survey date and Surveyor name**	31.03.2025. Louise Brown
Limitations (if applicable)	N/a	**Survey reference (if relating to a wider survey)**	N/a
Grid reference	TL 68155 44462	**Habitat parcel reference**	N/a
Condition Assessment Criteria		**Criterion passed (Yes or No)**	**Notes (such as justification)**
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range).[1] - At least 80% of scrub is native, - There are at least three native woody species[2], - No single species comprises more than 75% of the cover (except hazel *Corylus avellana* , common juniper *Juniperus communis* , sea buckthorn *Hippophae rhamnoides* (only in its restricted native range), or box *Buxus sempervirens* , which can be up to 100% cover).	No	Hawthorn comprises more than 75% of the scrub cover.
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran[3]) shrubs are all present.	No	Scrub appears to be the same age.
C	There is an absence of invasive non-native plant species[4] (as listed on Schedule 9 of WCA[5]) and species indicative of suboptimal condition[6] make up less than 5% of ground cover.	Yes	Wall cotoneaster and buddleia present but this does not constitute >5% cover.
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	Yes	
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	No	
		Number of criteria passed	2
Condition Assessment Result (out of 5 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**	

Passes 5 criteria	Good (3)		
Passes 3 or 4 criteria	Moderate (2)		
Passes 2 or fewer criteria	Poor (1)	Poor	
Suggested enhancement interventions to improve condition score			

Condition assessment for sparsely vegetated urban habitat (u1f, 81)

Condition Sheet: URBAN Habitat Type			
Habitat Types			
Sparsely vegetated land - Ruderal/Ephemeral **Sparsely vegetated land - Tall forbs** **Urban - Allotments** **Urban - Biodiverse green roof** **Urban - Bioswale** **Urban - Cemeteries and churchyards** **Urban - Facade-bound green wall** **Urban - Ground based green wall** **Urban - Intensive green roof** **Urban - Open mosaic habitats on previously developed land** **Urban - Rain garden** **Urban - Sustainable drainage system (SuDS)** **Urban - Vacant or derelict land** **Urban - Bare ground**			
Habitat Description			
Sparsely vegetated land - Ruderal/Ephemeral - Roadside verge adjacent a light industrial park. Hard substrate beneath thin layer of soil and moss.			
See the Statutory Biodiversity Metric User Guide for green roofs and UK Habitat Classification (UKHab) for other habitats:			UKHab – UK Habitat Classification
On-site or off-site, site name and location	Onsite. Land at Maple Park, Falconer Road, Haverhill, Suffolk CB9 7BG	**Survey date and Surveyor name**	31.03.2025 Louise Brown MCIEEM
Limitations (if applicable)	N/a	**Survey reference (if relating to a wider survey)**	N/a
Grid reference	TL 68155 44462	**Habitat parcel reference**	N/A

	Condition Assessment Criteria	Criterion passed (Yes or No)	Notes (such as justification)
Core Criteria - must be assessed for **all urban habitat types**:			
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	No	Mostly false oat grass and bare ground or moss. Few herbaceous species
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	No	As above
C	Invasive non-native plant species (listed on Schedule 9 of WCA[1]) and others which are to the detriment of native wildlife (using professional judgement)[2] cover less than 5% of the total vegetated area[3]. **Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).**	Yes	
Additional Criterion - must be assessed for **Open mosaic habitat on previously developed land** only:			
D	The parcel shows spatial variation and forms a mosaic of bare substrate PLUS: - At least four early successional communities (a) to (i); Communities: (a) annuals; (b) mosses/liverworts; (c) lichens; (d) ruderals; (e) inundation species; (f) open grassland; (g) flower-rich grassland; (h) heathland, (i) pools.		
Additional Criteria - must be assessed for **Bioswale and SuDS** habitat types only:			
E1	Plant species are mostly native. If non-native species are present, they should not be detrimental to the habitat or native wildlife[4].		
E2	The vegetation is comprised of plant species suited to wetland or riparian situations.		
Additional Criterion - must be assessed for **Intensive green roofs** only:			

F	The roof has a minimum of 50% native and non-native wildflowers. 70% of the roof area is soil and vegetation (including water features).		
Additional Criterion - must be assessed for **Biodiverse green roofs** only:			
G	The roof has a varied depth of 80 – 150 mm; at least 50% is at 150 mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. **Note – to achieve Good condition some additional habitat, such as sand piles, stones, logs etc. are present.**		
		Essential criteria relevant for habitat type achieved (Yes or No)	No
		Number of criteria passed	1

Condition Assessment Result	**Condition Assessment Score**	**Score Achieved ×/✓**
Results for habitats requiring assessment of **3 core criteria** only **(all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs)**:		
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C.	Good (3)	
• Passes 2 of 3 core criteria; OR • Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)	
• Passes 0 or 1 of 3 core criteria.	Poor (1)	Yes
Results for **Green roofs** and **Open mosaic habitat on previously developed land** (requiring assessment of **4 criteria** only - core criteria plus additional criterion specified for habitat type):		
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes additional criterion relevant to specific habitat type (D, F or G).	Good (3)	
• Passes 2 or 3 of 4 criteria; OR • Passes 4 of 4 criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)	
• Passes 0 or 1 of 4 criteria.	Poor (1)	
Results for **Bioswale or SuDS** (requiring assessment of **5 criteria** - core criteria plus additional criteria specified for habitat type):		
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes all additional criteria relevant to specific habitat type (Group E)	Good (3)	
• Passes 3 or 4 of 5 criteria; OR • Passes 5 of 5 criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)	
• Passes 2 or fewer of 5 criteria.	Poor (1)	
Suggested enhancement interventions to improve condition score		
Footnotes		

Condition assessment for urban trees (u, 32)

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. ***Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.***													
Habitat Description													
Semi-mature trees on roadside verge/sparsely vegetated urban land. glutinosa / T2 - willow (Salix sp) / T3 sycamore Acer pseudoplatanus													T1 - Alder Alnus
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		Onsite. Land at Maple Park, Falconer Road, Haverhill, Suffolk CB9 7BG		**Survey date and Surveyor name**		31.03.2025. Louise Brown MCIEEM							
				Survey reference (if relating to a wider survey)									
Limitations (if applicable)		N/A		**Habitat parcel reference**									
				T1	T2	T3							
				Grid reference									
				T	L	6	8	1	5	4	4	6	2
Condition Assessment Criteria				**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).			Y	Y	Y							All trees are native.
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							Individual trees.
C	The tree is mature (or more than 50% within the block are mature)[1].			N	N	N							All trees are semi-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.			N	N	N							Trees are stunted due to growing in hard rock substrate.
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.			N	N	N							None present.
F	More than 20% of the tree canopy area is oversailing vegetation beneath.			N	N	N							Trees are quite upright and growing tall. Likely due to proximity to mixed woodland area.
			Number of criteria passed	2	2	2							
Condition Assessment Result (out of 6 criteria)		**Condition Assessment Score**	**Score Achieved ×/✓**										
Passes 5 or 6 criteria		Good (3)											
Passes 3 or 4 criteria		Moderate (2)											
Passes 2 or fewer criteria		Poor (1)	Y	Y	Y								

Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.							
Suggested enhancement interventions to improve condition score[2]							
Trees/habitat to be removed so no enhancement provided on site.							

APPENDIX III: BIODIVERSITY NET GAIN AND PLANNING POLICY

National Planning Policy Framework

The NPPF sets out current government policy on biodiversity and nature conservation and places a duty on planners to make material consideration to the effect of a development on legally protected species when considering planning applications (MHC&LG, 2019). The NPPF also promotes sustainable development by ensuring that developments take account of the role and value of biodiversity and that it is conserved and enhanced within a development.

Under the NPPF planners have a duty to promote the conservation, restoration and enhancement of priority habitats. 'Plans should identify and pursue opportunities for securing measurable net gains for biodiversity'.

The NPFF works in conjunction with Government Circular 06/2005 'Biodiversity and Geological Conservation - Statutory Obligations and Their Impact within the Planning System'.

Local Planning Policies

The West Suffolk Joint Development Management Policies (2015) consider that it is possible, with sensitive planning and development, to conserve and enhance biodiversity and protect geodiversity. Nature conservation sites, both statutory and non-statutory, together with other countryside features which provide wildlife corridors and links, form an essential network which is necessary to ensure the continuation of the range and diversity of flora and fauna and the survival of important species. Development proposals should seek to conserve or enhance the biodiversity and geological interests of the area and in particular ensure that protected species and habitats including those set out in UK and local Biodiversity Action Plans (BAPs) will be protected and, where possible, enhanced.

Policy DM10: Impact of Development on Sites of Biodiversity and Geodiversity Importance states:

When considering development proposals which may have an adverse impact on nature conservation sites or interests, the local planning authority will have regard to the expert nature conservation advice provided by Natural England, the Suffolk Wildlife Trust and other specialist sources and the following criteria:

> *a. the ecological or geological value and objectives for which the site was classified or designated;*
>
> *b. the integrity of the site in terms of its wildlife value, its diversity and relationship with other ecological resources;*
>
> *c. the cumulative impact of the proposal and other developments on the wildlife or geological value of the site;*
>
> *d. the presence of protected species, habitat areas and wildlife corridors, or geological features, and proposed measures to safeguard and enhance them;*

e. the opportunity to create new habitat areas and to improve the conservation status of locally vulnerable species;

f. guidance set down within Biodiversity Action Plans (BAP), habitat management plans and other relevant sources; and

g. the extent to which the imposition of conditions or planning obligation:

i. would mitigate the effects of the development and/or protect the geological or nature conservation value of the locality;

ii. ensure replacement habitat or features; and/or

iii. ensure that resources are made available for the future enhancement and management of the replacement habitat or feature to enable it to attain the quality and attributes that have been lost

Policy DM12: Mitigation, Enhancement, Management and Monitoring of Biodiversity states:

In addition to, or as part of the requirements of other policies in this [Development Plan Document], *measures should be included, as necessary and where appropriate, in the design for all developments for the protection of biodiversity and the mitigation of any adverse impacts. Additionally, enhancement for biodiversity should be included in all proposals, commensurate with the scale of the development.*

Biodiversity Action Plans

The UK Biodiversity Action Plan (UKBAP) was organised to fulfil the Rio Convention on Biological Diversity in 1992, to which the UK is a signatory. A 'UK Post-2010 Biodiversity Framework' was published in July 2012 and succeeded the UKBAP. Much of the work for the UK BAP is now focussed at a country level due to devolution and the creation of country-level biodiversity strategies.

The UKBAP lists of priority species and habitats are still valuable reference sources. Notably, they have been used to help draw up statutory lists of priority species and habitats as required under Section 41 of the NERC act and are relied upon to provide the information required to assign Strategic Significance during Biodiversity Net Gain in the absence of Local Nature Recovery Strategies.

APPENDIX IV: BIODIVERSITY NET GAIN. GOOD PRACTICE PRINCIPLES FOR DEVELOPMENT

Principle	In Practice
Apply 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 a development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
Avoid losing biodiversity that cannot be offset elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve no net loss/ net gain.
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.
Address risk	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 realised.
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.
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 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
Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations, i.e. do not deliver something that would occur anyway.
Create a net gain legacy	Ensure net gain generates long-term benefits by; • Engaging stakeholders and jointly agreeing practical solutions that secure net gain for the lifetime of the development and with the objective of management continuing in the future. • Planning for adaptive management and securing dedicated funding for the long-term management • Designing net gain for biodiversity to be resilient to external factors, especially climate change • Mitigate risks from other land uses • Avoiding displacing harmful activities from one location to another • Supporting local-level management of net gain activities
Optimise sustainability	Prioritise biodiversity net gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
Be transparent	Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.