

Calculation of Biodiversity Net Gain using Defra Metric 3.1

For

Former Battle of Britain Site, Coldharbour
Road, Gravesend

November 2022

Status: For planning

Quality Management	
Project:	Former Battle of Britain Site, Coldharbour Road, Gravesend
Project No:	B22032
Report title:	Calculation of Biodiversity Net Gain using Defra Metric 3.1
Status:	For planning
Date of last revision:	15 th November 2022

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1 Introduction

1.1 Commission

- 1.1.1 The Landscape Partnership was commissioned by Frontier Estates Ltd to assess whether the proposed development Land at Former Battle of Britain Site, Coldharbour Road, Gravesend would provide a biodiversity net gain. This was calculated using the Defra Metric 3.1.

1.2 Legislation and policy background

- 1.2.1 There is a range of protection given to sites and species. Sites may be designated for local, national, European or global importance for nature conservation. Species may be protected by European-scale legislation or varying levels of national regulation. Further information is given in Appendix 1.
- 1.2.2 The Local Planning Authority has a policy to protect features of nature conservation value within its Local Plan. Other regulators have policies relating to the consents issued by them.
- 1.2.3 Gravesham Borough Council Local Plan¹ policy CS12: Green Infrastructure states, '*there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought.*'
- 1.2.4 The Local Plan does not set the magnitude of the measurable net gain required nor does it state that no net loss needs to be quantified using a metric. The Environment Bill (which is subject to secondary legislation due in 2023, which will make BNG compulsory) has set a minimum 10% net gain, although this is currently not mandatory.

1.3 Site location and context

- 1.3.1 The site is located in south-west of Gravesend, in north-west Kent. The site lies on the corner of Coldharbour Road and New House Lane and the existing access is off Coldharbour Road to the west. The site, approximately 0.49 hectares, consists of the former Battle of Britain public house. The site is now vacant and from aerial photography and notes on the topographical survey the public house was thought to have been demolished during 2016. The site currently consists of ephemeral vegetation in the location of the demolished pub, as well as hardstanding and poor quality grass. The site is surrounded by fencing.
- 1.3.2 The site is immediately surrounded predominantly by residential and suburban areas of Gravesend. The River Thames is located approximately 2.2km north of the site, with the A2 located approximately 850m south of the site.
- 1.3.3 The Ordnance Survey Grid Reference for the approximate centre of the proposed development site is TQ 6366 7226. A plan showing the existing habitats within site is provided at Figure 01.

1.4 Acknowledgements

- 1.4.1 Useful discussions were held with Owen Terry (Landscape Architect at The Landscape Partnership) which helped formulate the proposals in the landscape proposals.
- 1.4.2 The original Phase 1 Habitat survey was carried out by Emily Costello (FISC level 3) on the 5th April 2022.

1.5 Description of the project

- 1.5.1 It is proposed to construct a 65-bed care home, with associated parking facilities and garden for use by the residents. It is proposed to create a new access into the site off New House Lane. A new footpath is proposed to link the proposed care home site to an existing bus stop. The development proposals are shown in Appendix 2.

¹ Gravesham Borough Council (Adopted September 2104) Gravesham Local Plan Core Strategy.

- 1.5.2 The site previously gained planning permission for the construction of 20 residential units, with associated parking spaces and communal gardens (Gravesend Borough Council planning reference 20171245). This planning permission has since lapsed.

1.6 Objectives of this report

- 1.6.1 The objectives of the biodiversity calculations are:

- Calculate the existing biodiversity units as existing, prior to the development being implemented.
- Calculate the proposed biodiversity units according to the landscape proposals provided at the time of the planning application.
- Assess the net change in biodiversity units resulting from the development.

2 Biodiversity Net Gain calculation

2.1 Data sources

2.1.1 The areas and lengths of existing habitats were calculated using the habitat map produced by The Landscape Partnership (April 2022) as part of the Preliminary Ecological Appraisal and using the site topographic survey to calculate the habitat areas. It was necessary to convert these habitats recorded into the UK Habitat Classification which is a different system of habitat classification used by the Defra Metric 3.1. The 'UK Habs/Phase 1 translation' tab in the 'Technical Data' on the Defra Metric was used to convert the habitats. The existing pre-development habitat areas are listed in the tables below.

Site habitats baseline

Phase 1 habitat survey habitats pre-development	UK Habitat Classification	Area / ha
A2.1 Dense/continuous scrub	Heathland & Shrubs – Mixed scrub	0.03
A3.1 Broad-leaved scattered trees	Urban – Urban tree	2No. medium (0.07) 5No. small (0.02)
B6 Semi-improved grassland (Poor quality)	Grassland - Modified grassland	0.10
J1.2 Amenity grassland	Grassland - Modified grassland	0.01
J1.3 Ephemeral/short perennial	Sparsely vegetated land – Ruderal/Ephemeral	0.18
J1.4 Introduced shrubs	Urban – Introduced shrub	0.01
J4 Hardstanding	Urban – Developed land; sealed surface	0.16
Total (excluding trees)		0.49

Linear habitat baseline

Phase 1 habitat survey linear habitat pre-development	UK Habitat Classification	Length / km
J2.1.2 Species-poor intact hedgerow	Hedge Ornamental Non-Native	0.01
Total length		0.01

2.1.2 Retained and proposed habitats were measured from the landscape proposals drawing produced by The Landscape Proposals (drawing number: B22052-102, June 2022) using AutoCAD. It was necessary to convert the proposed habitats into the UK Habitat Classification. Retained and proposed habitats and linear features are listed in the tables below.

Retained site habitats

Landscape Proposals (drawing number: B22032-102)	UK Habitat Classification	Area / ha
A2.1 Dense/continuous scrub	Heathland & Shrubs – Mixed scrub	0.02
A3 Broad-leaved scattered trees	Urban - Urban Tree	2No. medium (0.07) 2No. small (0.01)
B6 Semi-improved grassland (Poor quality)	Grassland - Modified grassland	0.01
Total (excluding trees) retained		0.46
Site areas less area of retained habitats = area for habitat creation		0.46

Retained Linear habitats

2.1.3 There are no retained linear features for this site.

Proposed habitat creation

Landscape Proposals (drawing number: B22032-102)	UK Habitat Classification	Area / ha
Proposed native trees including feature trees & standard trees	Urban – Urban tree	0.11 (3No. medium) 0.08 (19No. small)
Proposed ornamental trees and pleached tree	Urban – Urban tree	0.06 (16No. small)
Proposed medium height shrub/ornamental planting	Urban – Introduced shrubs	0.09
Proposed mixed species native shrub planting	Heathland & Shrubs – Mixed scrub	0.01
Proposed amenity grass (frequently mown)	Grassland – Modified grassland	0.03
Proposed wildflower meadow (EM2)	Grassland – Other Neutral	0.01
Proposed buildings and hardworks	Urban – Developed land; sealed surface	0.32
Total (excluding trees)		0.46

Proposed Linear habitat creation

Landscape Proposals (drawing number: B22032-102)	UK Habitat Classification	Length / km
Proposed mixed species native hedge	Native hedgerow	0.08
Proposed evergreen hedge	Hedge Ornamental Non-Native	0.13
Total length		0.21

2.2 Calculation methodology

2.2.1 The Defra Metric 3.1 spreadsheet (Biodiversity Metric 3.1 Auditing and accounting for biodiversity Calculation tool) calculation tool was downloaded from the Natural England website on 11th August 2022. Data was entered from the sources above. Each habitat was assessed for its condition using condition sheets in Annex 1 within the technical guidance². Reasonable assumptions were made about the proposed condition of new habitats.

Sites habitat baseline

Heathland & Shrub – Mixed scrub

2.2.2 The first area of scrub habitat was dominated by bramble *Rubus fruticosus* agg. scrub with occasional elm *Ulmus* sp. in poor condition. This habitat has been classified as 'mixed scrub' due to the present of elm, although the habitat was dominated by bramble. This bramble has appeared on aerial photographs in the years following the demolition of the pub and has therefore established recently. This section of mixed scrub is being removed.

2.2.3 A second section of mixed scrub was located along the north-eastern boundary. This scrub consisted of cherry plum *Prunus cerasifera*, elder *Sambucus nigra* and elm. This section of scrub has likely established since the pub has been vacant and due to a lack of management. This area of scrub will be retained.

2.2.4 Both these sections of scrub have been classified as poor condition, see table taken from The Biodiversity Metric 3.1 – Technical Supplement.

Condition Assessment Criteria – Mixed scrub		
1	Habitat is representative of UKHab description (where in its natural range). There are at least three woody species, with no one species comprising more than 75% of the cover (except common juniper, sea buckthorn or box, which can be up to 100% cover).	Fail
2	There is a good age range – all of the following are present: seedlings, young shrubs and mature shrubs.	Fail
3	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981) and species indicative of sub-optimal condition make up less than 5% of ground cover.	Pass
4	The scrub has a well-developed edge with scattered scrub and tall grassland and/or herbs present between the scrub and adjacent habitat(s).	Fail
5	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Fail
Condition Assessment Score		
Passes 5 of 5 criteria		Good (3)
Passes 3 or 4 of 5 criteria		Moderate (2)
Passes 0, 1 or 2 of 5 criteria		Poor (1)

Urban trees

2.2.5 The trees within the development have been classified as 'Urban – Urban trees' because, according to the Biodiversity Metric 3.1 User Guide, 'Urban tree' applies to those situated in urban habitats such as private gardens and private land. These trees are located in an urban environment and were associated with the former public house. Two trees (T1 – beech and T10

Panks S., White N., Newsome A., Potter J., Heydon M., Mayhew E., Alvarez M., Russell T., Scott S.J., Heaver M., Scott S.H., Treweek J., Butcher B. and Stone D., 2021. Biodiversity metric 3.1: Auditing and accounting for biodiversity – User Guide. Natural England. First published 7th July 2021.

– goat willow) were considered to be medium sized trees due to their size and maturity, with the remaining trees on site considered to be small sized trees.

- 2.2.6 The goat willow provided low bat roost potential, while no other trees on site offered bat roosting opportunities. All trees offered bird nesting opportunities. These trees only passed two of the criteria stated within the technical guidance note and therefore are considered to be in poor condition (see table taken from The Biodiversity Metric 3.1 – Technical Supplement).

Condition Assessment Criteria – urban trees		
1	The tree is a native species (or more than 70% within the block are native species).	Pass
2	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).	Pass
3	The tree is mature or veteran (or more than 50% within the block are mature or veteran).	Fail
4	There is little or no evidence of an adverse impact on tree health by anthropogenic activities such as vandalism or herbicide use. There is no current regular pruning regime so the trees retain >75% of expected canopy for their age range and height.	Fail
5	Micro-habitats for birds, mammals and insects are present e.g. presence of deadwood, cavities, ivy or loose bark	Fail
6	More than 20% of the tree canopy area is oversailing vegetation beneath.	Fail
Condition Assessment Score		
Passes 5 or 6 of 6 criteria		Good (3)
Passes 3 or 4 of 6 criteria		Moderate (2)
Passes 0, 1 or 2 of 6 criteria		Poor (1)

Grassland – Modified grassland (poor quality semi-improved grassland)

- 2.2.7 The grassland denoted as semi-improved grassland was previously managed as amenity grassland as part of the former public house, as seen on aerial photographs. Since the demolition of the former public house, this grassland does not appear to have been as regularly managed given the sward height and ruderal species present within the grassland. The grassland outside the hoarding also consisted of this habitat type. At the time of the survey the sward height in this area was approximately 10cm. The management of this grassland is unknown; however, given the grassland condition, it is likely mowed fairly regularly.

- 2.2.8 The grassland sward has been assessed as being in poor condition due to a low species diversity and the management of the grassland (see table taken from The Biodiversity Metric 3.1 – Technical Supplement).

Condition Assessment Criteria – grassland		
1	There must be 6-8 species per m2. If a grassland has 9 or more species per m2 it should be classified as a medium distinctiveness grassland habitat type. NB - this criterion is essential for achieving moderate condition.	Fail
2	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 insects, birds and small mammals to live and breed.	Fail

Condition Assessment Criteria – grassland		
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Fail
4	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.	Pass
5	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Fail
6	Cover of bracken less than 20%.	Pass
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Pass
Condition Assessment Score		
Passes 6 or 7 of 7 criteria including non-negotiable criterion 7		Good (3)
Passes 4 or 5 of 7 criteria; OR Passes 6 of 7 criteria excluding non-negotiable criterion 7		Moderate (2)
Passes 0, 1, 2 or 3 of 7 criteria		Poor (1)

Grassland – Modified grassland (Amenity grassland)

2.2.9 This grassland appeared to be mown on a regular basis and had a sward height of approximately 5-8cm.

2.2.10 The grassland sward has been assessed as being in poor condition due to a low species diversity and management of the grassland (see table taken from The Biodiversity Metric 3.1 – Technical Supplement).

Condition Assessment Criteria – grassland		
1	There must be 6-8 species per m2. If a grassland has 9 or more species per m2 it should be classified as a medium distinctiveness grassland habitat type. NB - this criterion is essential for achieving moderate condition.	Fail
2	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 insects, birds and small mammals to live and breed.	Fail
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Fail
4	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.	Pass
5	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Fail
6	Cover of bracken less than 20%.	Pass
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Pass
Condition Assessment Score		

Condition Assessment Criteria – grassland	
Passes 6 or 7 of 7 criteria including non-negotiable criterion 7	Good (3)
Passes 4 or 5 of 7 criteria; OR Passes 6 of 7 criteria excluding non-negotiable criterion 7	Moderate (2)
Passes 0, 1, 2 or 3 of 7 criteria	Poor (1)

Sparsely vegetated land – Ruderal/Ephemeral

2.2.11 The habitat of this type within the site consisted of rubble with vegetation emerging and establishing. This was the location of the former Battle of Britain Public House that had been demolished in 2016.

2.2.12 This habitat only passed one of the criteria stated within the technical guidance note and therefore was considered to be in poor condition (see table taken from The Biodiversity Metric 3.1 – Technical Supplement).

Condition Assessment Criteria – Urban, sparsely vegetated land		
1	Vegetation structure is varied, providing opportunities for insects, birds and bats to live and breed. A single ecotone (i.e. scrub, grassland, herbs) should not account for more than 80% of the total habitat area.	Fail
2	There is a diverse range of flowering plant species, providing nectar sources for insects. These species may be either native, or non-native but beneficial to wildlife. NB - To achieve GOOD condition, criterion 2 must be satisfied by native species only (rather than non-natives beneficial to wildlife). Note that Biodiverse green roofs are exempt from this requirement, and can include non-native sedums, as set out in footnote 1."	Fail
3	Invasive non-native species (Schedule 9 of WCA) cover less than 5% of total vegetated area. NB - To achieve GOOD condition, criterion 3 must be satisfied by a complete absence of invasive non-native species (rather than <5% cover)."	Pass
Condition Assessment Score		
Passes 3 of 3 core criteria AND meets the requirements for good condition within criteria 2 and 3		Good (3)
Passes 2 of 3 core criteria; OR passes 3 of 3 core criteria but does not meet the requirements for good conditions within criteria 2 and 3		Moderate (2)
Passes 0 or 1 of 3 core criteria		Poor (1)

Urban – Introduced shrubs & Developed land; sealed surface

2.2.13 The condition of the introduced shrubs and developed land, sealed surface habitat type is automatically set as 'Condition assessment N/A' and 'N/A – other', respectively, within the metric.

2.2.14 None of the baseline habitats were situated within a local strategy nor were they ecologically desirable due to their poor condition, unsuitability for the support of protected species and isolation from good quality habitat.

2.2.15 The habitats that will be retained included the two medium sized trees and two of the small sized trees, as well as a small section of existing grassland verge.

Linear feature baseline

Hedge ornamental non native

- 2.2.16 A small section of privet *Ligustrum* sp. hedgerow was located towards the southern boundary. This hedgerow, approximately 2.5m in height, protruded into the site from the southern boundary. This hedgerow was likely planted to define separate areas within the former public house grounds.
- 2.2.17 The condition of this hedgerow is automatically assigned to poor condition within the metric because it is non-native.
- 2.2.18 This hedgerow will be removed under current design plans.

Habitats created

- 2.2.19 All habitat listed below are habitats to be created.

Urban trees

- 2.2.20 The proposed trees have been classified as 'Urban – Urban trees' as these will be in an urban setting and managed for amenity value. The condition of the medium sized and small sized native trees will be moderate given the management proposed, quantity of native species proposed and vegetation proposed underneath the trees. The proposed feature trees and standard trees have been classified as medium trees because by the end of the standard time to achieve target condition (27 years) these trees are expected to have grown to medium trees. The other native trees have been classified as small size trees.
- 2.2.21 The proposed ornamental trees and pleached tree have been classified as small trees due to the species chosen for these locations and the management proposed. These small trees have been classified as being of poor condition due to proposed management and use of non-native species (see table taken from The Biodiversity Metric 3.1 – Technical Supplement).

Condition Assessment Criteria – urban trees		Native species	Ornamental species
1	The tree is a native species (or more than 70% within the block are native species).	Pass	Fail
2	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).	Pass	Pass
3	The tree is mature or veteran (or more than 50% within the block are mature or veteran).	Fail	Fail
4	There is little or no evidence of an adverse impact on tree health by anthropogenic activities such as vandalism or herbicide use. There is no current regular pruning regime so the trees retain >75% of expected canopy for their age range and height.	Fail	Fail
5	Micro-habitats for birds, mammals and insects are present e.g. presence of deadwood, cavities, ivy or loose bark	Fail	Fail
6	More than 20% of the tree canopy area is oversailing vegetation beneath.	Pass	Pass
Condition Assessment Score			
Passes 5 or 6 of 6 criteria		Good (3)	
Passes 3 or 4 of 6 criteria		Moderate (2) – Native trees	
Passes 0, 1 or 2 of 6 criteria		Poor (1) – Ornamental trees	

Urban – Introduced shrubs

- 2.2.22 The best habitat type for proposed medium height shrubs and ornamental shrubs planting is 'Urban – Introduced Shrubs'. This is because the species that will be used are non-native and ornamental species. The condition of these habitats was assessed as poor. Although there will be a high proportion of species used will be nectar-rich and berry-producing, these habitats will be managed for amenity value and therefore be neat and trimmed. Furthermore, the only option available for condition on the metric under this habitat type is poor.

Heathland and shrubs

- 2.2.23 Proposed native shrub planting has been classified as 'Heathland and shrub – Mixed scrub' as this habitat best fits the proposed habitat. The proposed habitat will be a mixture of native shrubs and will be managed for wildlife. This habitat has been classified as poor condition, see table taken from The Biodiversity Metric 3.1 – Technical Supplement. The proposed native shrubs are located at the boundaries of the site and aim to strengthen the boundaries and resources within the site for nesting birds. This habitat type is not located within a local strategy; however, it is ecologically desirable. This is because it provides better connectivity around the site, bridges the gaps between existing hedgerows and provide foraging and nesting opportunities for a variety of protected species.

Condition Assessment Criteria – Mixed scrub		
1	Habitat is representative of UKHab description (where in its natural range). There are at least three woody species, with no one species comprising more than 75% of the cover (except common juniper, sea buckthorn or box, which can be up to 100% cover).	Pass
2	There is a good age range – all of the following are present: seedlings, young shrubs and mature shrubs.	Fail
3	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981) and species indicative of sub-optimal condition make up less than 5% of ground cover.	Pass
4	The scrub has a well-developed edge with scattered scrub and tall grassland and/or herbs present between the scrub and adjacent habitat(s).	Fail
5	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Fail
Condition Assessment Score		
Passes 5 of 5 criteria		Good (3)
Passes 3 or 4 of 5 criteria		Moderate (2)
Passes 0, 1 or 2 of 5 criteria		Poor (1)

Grassland – Modified grassland

- 2.2.24 The proposed amenity grassland has been categorised as 'Grassland– Modified grassland' as the criteria for these habitat types are the best fit. This habitat has been assessed as providing poor condition as it will be regularly maintained to a uniform height, used for recreational purposes, will not contain microclimates and will not be of significant ecological benefit to wildlife, with the exception of minor benefit to common/widespread foraging birds (see table taken from The Biodiversity Metric 3.1 – Technical Supplement).

Condition Assessment Criteria – grassland		
1	There must be 6-8 species per m ² . Note - if a grassland has 9 or more species per m ² it should be classified as a moderate distinctiveness grassland habitat type.	Fail

Condition Assessment Criteria – grassland		
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20 per cent is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Fail
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Fail
4	Physical damage evident in less than 5% of total grassland area, such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities.	Pass
5	Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	Fail
6	Cover of bracken less than 20%.	Pass
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981) and undesirable species make up less than 5% of ground cover.	Pass
Condition Assessment Result		
Passes 6 or 7 of 7 criteria including non-negotiable criterion 7		Good (3)
Passes 4 or 5 of 7 criteria; OR Passes 6 of 7 criteria excluding non-negotiable criterion 7		Moderate (2)
Passes 0, 1, 2 or 3 of 7 criteria		Poor (1)

Grassland – Other neutral grassland

2.2.25

The proposed wildflower meadow mixtures (Emorsgate Standard General Purpose Meadow Mixture EM2) have been categorised as 'Grassland – other neutral', as this is the best fit taking into consideration the variety of grass species and wildflower species within the seed mixes (80% grasses and 20% wildflowers). This grassland has been assessed as providing moderate condition given the species composition and management proposed (see table taken from The Biodiversity Metric 3.1 – Technical Supplement). This habitat type is not located within a local strategy; however, it is ecologically desirable. This is because it provides foraging opportunities for a variety of protected species.

Condition Assessment Criteria – Grassland – other neutral grassland		
1	The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type (see UKHab definition). Wildflowers, sedges and indicator species for the specific grassland habitat type are very clearly and easily visible throughout the sward. NB - This criterion is essential for achieving moderate condition for non-acid grassland types only.	Pass
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20 per cent is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Fail
3	Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	Fail
4	Cover of bracken less than 20% and cover of scrub (including bramble) less than 5%.	Pass
5	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981). Combined cover of species indicative	Pass

Condition Assessment Criteria – Grassland – other neutral grassland		
	of sub-optimal condition1 and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.	
6	There are greater than 9 species per metre squared. NB - This criterion is essential for achieving good condition (non-acid grassland types only).	Pass
Condition Assessment Score		
Passes 5 of 6 criteria including essential criterion 1		Good (3)
Passes 3 or 4 of 6 criteria including essential criterion 1		Moderate (2)
Passes 0, 1 or 2 of 6 criteria OR passes 3 or 4 criteria excluding criterion 1 and 6		Poor (1)

Urban – Developed land; sealed surface

- 2.2.26 The condition of the developed land, sealed surface habitat type is automatically set as 'N/A – other' within the metric.

Linear feature proposed

Native hedgerows

- 2.2.27 The proposed native hedgerows will contain native species and have been categorised as 'native hedgerow' under the UK Habitat Classification, as this was the best fit for these proposed native hedgerows. The condition of the hedgerow has been classified as moderate condition, due to the likely management of the hedgerows and species they will contain (see table taken from The Biodiversity Metric 3.1 – Technical Supplement).

Condition Assessment Criteria - hedgerow without trees			
A1. Height	>1.5 m average along length	The average height of woody growth estimated from base of stem to the top of 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).	Fail
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 (e.g. blackthorn suckers) are only included in the width estimate when they >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 practice4).	Pass
B1 Gap – hedge base	Gap between ground and base of canopy <0.5 m for >90% of	This is the vertical gappiness of the woody component of the hedgerow, and its	Pass

Condition Assessment Criteria - hedgerow without trees			
	length (unless 'line of trees')	distance from the ground to the lowest leafy growth. Certain exceptions to this criterion are acceptable (see page 65 of the Hedgerow Survey Handbook).	
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).	Pass
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 hedge (at least)	This is the level of disturbance (excluding wildlife disturbance) at the base of the hedge. Undisturbed ground should be present for at least 90% of the hedgerow length, greater than 1m in width and must be present along at least one side of the hedge. This criterion recognises the value of the hedge 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."	Fail
C2 Undesirable 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, should not exceed the 20% cover threshold.	Pass
D1 Invasive and neophyte species	>90% of the hedgerow and undisturbed ground is free of invasive non-native and neophyte species	Neophytes are plants that have naturalised in the UK since AD 1500. For information on neophytes see the JNCC website and for information on invasive non-native species see the GB Non-Native Secretariat website.	Pass
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 (e.g. excessive hedge cutting).	Pass
Condition Assessment Score (hedgerow without trees)			
No more than 2 failures in total; AND No more than 1 in any functional group.		Good	
No more than 4 failures in total; AND Does not fail both attributes in more than one functional group (e.g. fails attributes A1, A2, B1 & C2 = Moderate condition).		Moderate	

Condition Assessment Criteria - hedgerow without trees	
Fails a total of more than 4 attributes; OR Fails both attributes in more than one functional group (e.g. fails attributes A1, A2, B1 & B2 = Poor condition).	Poor

- 2.2.28 This proposed linear feature is located within a local strategy; and is considered to be ecologically desirable. This is because these native hedgerows provide better connectivity around the site and provide foraging and nesting opportunities for a variety of protected species. See below section on existing and proposed habitats and local strategies.

Hedge Ornamental Non-Native

- 2.2.29 The proposed evergreen hedgerows have been categorised as being in poor condition. This is because in the metric 'Poor' condition is the only option available for this linear feature. This linear feature was not situated within a local strategy nor is it ecologically desirable.

Existing and proposed habitats and local strategies

- 2.2.30 Gravesham Borough Council Local Plan³ describes principles for green infrastructure in development within its Green Infrastructure policies. Paragraph 5.7.18 (page 119) identifies that *landscape features such as trees and hedgerows within urban area are important as they help to raise the quality of the environment and the quality of people's lives, as well as providing stepping stones and habitats for wildlife. Therefore, it is important that such landscape features within the urban area are retained and enhanced.*
- 2.2.31 The proposed native hedgerows and proposed trees are considered to be formally identified in a local strategy and this has been reflected within the metric.
- 2.2.32 The proposed mixed scrub and proposed wildflower grassland have not been formally identified within a local strategy; however, these habitats are beneficial to wildlife and biodiversity. Both these proposed habitats will provide enhanced foraging opportunities for wildlife such as bats and birds, with the native scrub providing additional nesting opportunities for birds. This has been reflected within the metric.

2.3 Biodiversity Impact calculation results

- 2.3.1 The existing site value was calculated at 1.08 Habitat units and 0.01 Hedgerow Units. There are no river units before or after development.
- 2.3.2 Based on the landscape proposals drawing which includes retained and created vegetation, the proposed value is 1.60 Habitat Units and 0.43 Hedgerow Units. This represents a gain in 0.52 Habitat Units and a gain in 0.42 Hedgerow Units as rounded to 2 decimal places in the 'Results' tab of the metric. There is therefore a net gain of 48.50% of habitat units and a net gain of 4234.03% of hedgerow units.
- 2.3.3 A large number of trees are proposed for retention, as well as smaller areas of existing grassland and existing scrub habitats. Proposed tree and hedgerow planting will mitigate and enhance the site for the small losses of existing trees and hedgerows. Furthermore, native wildflower grassland and native scrub planting are also proposed to provide benefits to wildlife.
- 2.3.4 All of the proposed habitats are on-site and no biodiversity off-setting is proposed.
- 2.3.5 The headline and detailed results are shown in Appendix 3. The Results page says '*Trading rules Satisfied? Yes - Check Trading Summary*'.

³ Gravesham Borough Council (Adopted September 2104) Gravesham Local Plan Core Strategy.

2.4 Conclusions

- 2.4.1 The development would achieve a biodiversity net gain, which has been calculated at 48.50% for habitats and 4234.03% for hedgerows. These net gain percentages meet the need for no net loss as required in the Gravesham Borough Council Local Plan.

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Figures



Key

	Site Boundary
	A2.1 Dense / continuous scrub
	A3.1 Broad-leaved scattered trees
	B6 Poor semi-improved grassland
	J1.2 Amenity grassland
	J1.3 Ephemeral / short perennial
	J1.4 Introduced shrub
	J2.1.2 Species-poor intact hedge
	J2.4 Fence
	J4 Hardstanding

Target notes

Rabbit/fox holes

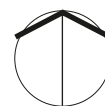
B22032 - Coldharbour Road, Gravesend

Phase 1 Habitat Survey

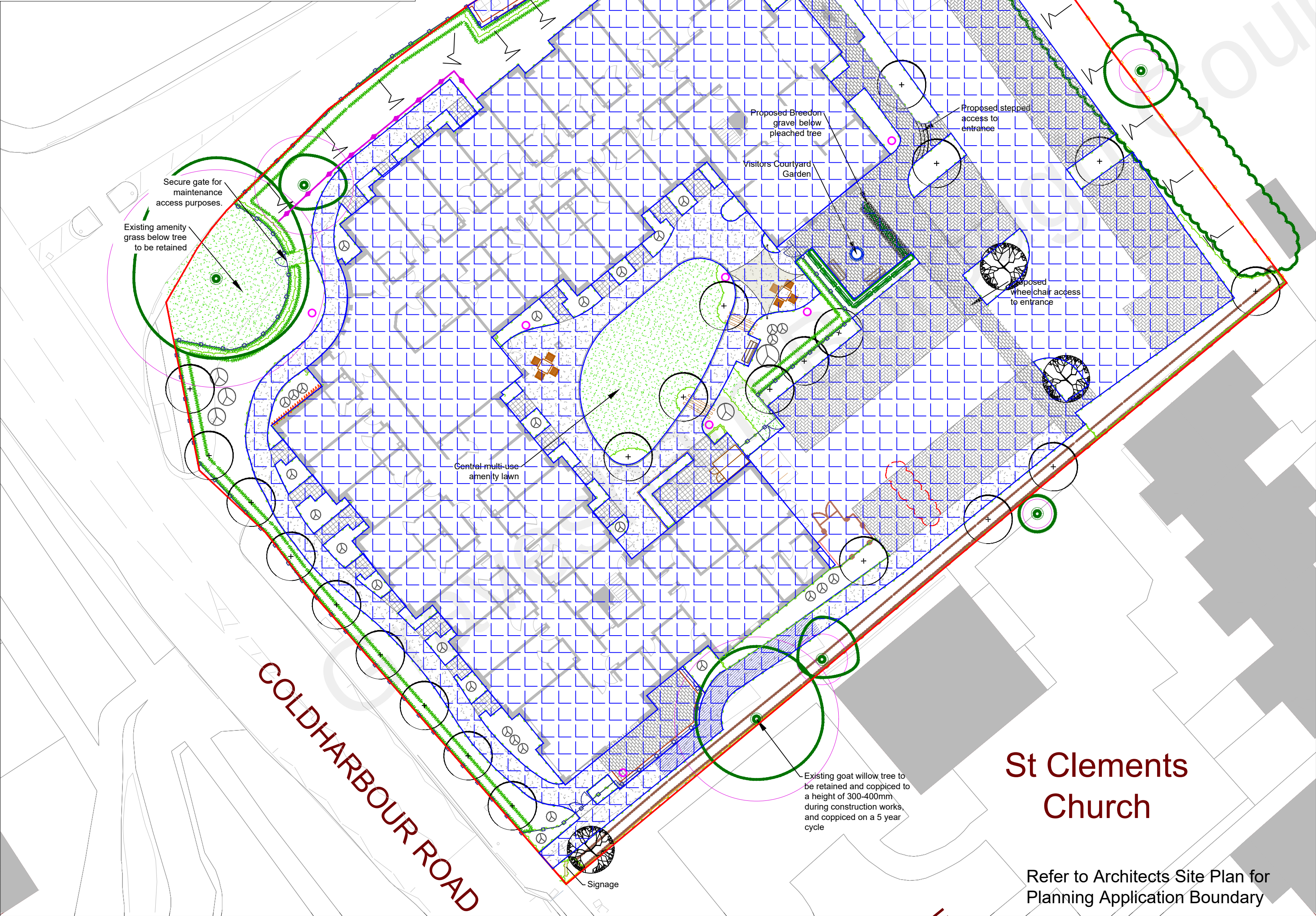
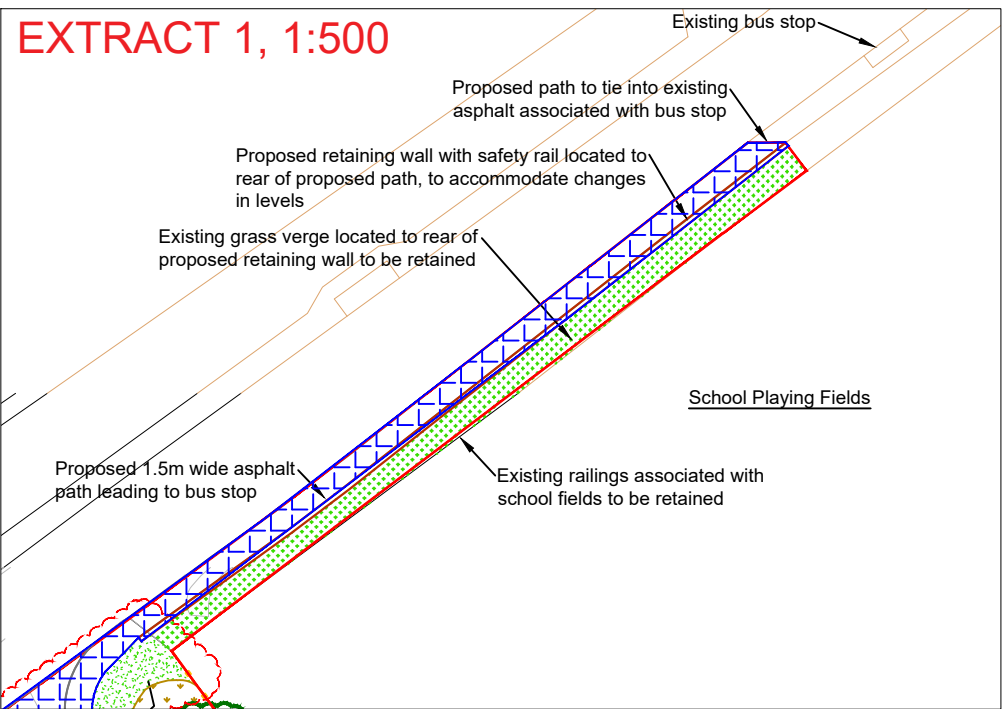
Figure 01

Scale: NTS

April 2022



EXTRACT 1, 1:500



EXTRACT 1



Key

- Site Boundary (4917 m2)
- Existing trees and vegetation to be retained with Root Protection Areas indicated in magenta (Existing vegetation to be retained within boundary 179 m2)
- Existing tree or vegetation to be removed
- Proposed native feature tree (3 no.)
- Proposed tree (proposed 18 no. native species tree & proposed 7no. ornamental tree)
- Proposed pleached tree (9 no.)
- Proposed specimen shrubs
- Proposed medium height shrub planting (912 m2)
- Proposed mixed species native shrub planting (35 m2)
- Proposed evergreen hedgerow (127l/m)
- Proposed mixed species native (77 l/m)
- Proposed amenity grass (256 m2)
- Proposed wildflower meadow - such as EM 2 Standard Meadow Mix by Emorsgate Seeds or similar approved. (22 m2)
- Existing grass verge to be retained (94 m2)
- Proposed climbing shrubs, grown up blank facade of building
- Proposed hardworks (3419 m2)

A Amendments following updated Landscape Proposals RG 14.11.2022

Letter Revision By Date

thelandscapepartnership

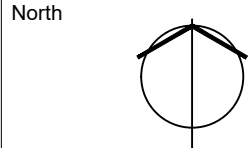
Project
Coldharbour Road,
Gravesend

Drawing
Biodiversity Net Gain
- Measurements

Bedford	01234 261315	☒
Woodbridge	01394 380509	☐
London	020 3092 4141	☐
Norwich	01603 230777	☐

Job No.	B22032
Dwg. No.	701A
Scale	1:250@A2
Drawn	RG
Checked	OT
Date	30.08.2022

Do not scale off drawing. All dimensions & Levels are to be checked on site. Any discrepancies must be reported to the landscape architect immediately.
Copyright THE LANDSCAPE PARTNERSHIP LTD



Gravesham Borough Council

Appendix 1

Legislative and policy context

There is a number of pieces of legislation, regulations and policies specific to ecology which underpin this assessment. These may be applicable at a European, National or Local level. References to legislation are given as a summary for information and should not be construed as legal advice.

Birds Directive

The European Community Council Directive on the Conservation of Wild Birds (79/409/EEC), normally known as the Birds Directive, sets out general rules for the conservation of all naturally occurring wild birds, their nests, eggs and habitats. It was superseded by the 'new' Birds Directive (2009/147/EC) which generally updated the previous directive.

These requirements are interpreted into English law by the Wildlife and Countryside Act 1981 (as amended) with regard to protection of birds, and the Conservation of Habitats and Species Regulations 2017 with regard to the registration and regulation of Special Protection Areas.

Habitats Directive

The European Community Council Directive on the Conservation of Natural Habitats of Wild Fauna and Flora (92/43/EEC), normally known as the Habitats Directive, aims to protect the European Union's biodiversity. It requires member states to provide strict protection for specified flora and fauna (i.e. European Protected Species) and the registration and regulation of Special Areas of Conservation.

These requirements are interpreted into English law by the Conservation of Habitats and Species Regulations 2017 with regard to European Protected Species and the registration and regulation of Special Areas of Conservation.

Conservation of Habitats and Species Regulations 2017

The Conservation of Habitats and Species Regulations 2017 interpret the Birds Directive and Habitats Directive into English and Welsh law. For clarity, the following paragraphs consider the case in England only, with Natural England given as the appropriate nature conservation body. In Wales, the Countryside Council for Wales is the appropriate nature conservation body.

Special Protection Areas and Special Areas of Conservation are defined in the regulations as 'European sites'. The Regulations regulate the management of land within European sites, requiring land managers to have the consent of Natural England before carrying out management. Byelaws may also be made to prevent damaging activities and if necessary land can be compulsorily purchased to achieve satisfactory management.

The Regulations define competent authorities as public bodies or statutory undertakers. Competent authorities are required to make an appropriate assessment of any plan or project they intend to permit or carry out, if the plan or project is likely to have a significant effect upon a European site. The permission may only be given if the plan or project is ascertained to have no adverse effect upon the integrity of the European site. If the competent authority wishes to permit a plan or project despite a negative assessment, imperative reasons of over-riding public interest must be demonstrated, and there should be no alternative to the scheme. The permissions process would involve the Secretary of State and the option of consulting the European Commission. In practice, there will be very few cases where a plan or project is permitted despite a negative assessment. This means that a planning application has to be assessed by the Local Planning Authority, based on information provided by the applicant, and the assessment must either decide that it is likely to have no significant effect on a European site or ascertain that there is no adverse effect upon the integrity of the European site.

Government policy is for Ramsar sites (wetlands of global importance) to be treated as if they were European sites within the planning process.

Appropriate Assessment

Appropriate Assessment is required in certain instances under the Conservation of Habitats and Species Regulations 2017. Regulation 63 says that:

63.— (1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which-

(a) is likely to have a significant effect on a European site or a European offshore marine site

(either alone or in combination with other plans or projects), and
(b) is not directly connected with or necessary to the management of the site,
must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.

(2) A person applying for any such consent, permission or other authorisation shall provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable them to determine whether an appropriate assessment is required.

(3) The competent authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority may specify.

(4) They must also, if they consider it appropriate, take the opinion of the general public, and if they do so, they must take such steps for that purpose as they consider appropriate.

(5) In the light of the conclusions of the assessment, and subject to regulation 64 (considerations of overriding public interest), the competent authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

(6) In considering whether a plan or project will adversely affect the integrity of the site, the authority must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which they propose that the consent, permission or other authorisation should be given.

The competent authority is typically the local planning authority. The appropriate assessment contains the information the council requires for the purposes of its assessment under the Habitat Regulations.

The Habitat Regulations also are applicable to local authority land use plans and policies. If a policy or plan is likely to have a significant effect upon a European site, the permission may only be given if the policy or plan is ascertained to have no adverse effect upon the integrity of the European site. This approach gives rise to a hierarchy of plans each with related appropriate assessments. For example, the appropriate assessment of a Regional Spatial Strategy will affect policies within a Core Strategy, which will then need its own appropriate assessment, and so on.

European Protected Species

European Protected Species of animals are given protection from deliberate capture, injury, killing, disturbance or egg taking/capture. Their breeding sites or resting places are also protected from damage or destruction, which does not have to be deliberate. A number of species are listed as European Protected Species, with those most likely to be considered in planning applications being bats, dormouse, great crested newt and otter. Natural England may give a licence for actions that are otherwise illegal, subject to them being satisfied on the three tests of no alternative, over-riding public interest, and maintenance of the species in favourable condition.

European Protected Species of plant are also listed and given protection. These species are generally very rare and unlikely to be present in proposed development sites.

Wildlife and Countryside Act 1981

The Wildlife and Countryside Act 1981 has been amended many times, including by the Countryside and Rights of Way Act 2000. It contains provisions for the notification and regulation of Sites of Special Scientific Interest, and for protected species.

The Regulations regulate the management of land within Sites of Special Scientific Interest, requiring land managers to have the consent of Natural England before carrying out management.

All public bodies are defined as 'S28G' bodies, which have a duty to further the nature conservation of Sites of Special Scientific Interest in the undertaking of their functions. In practice, this prevents planning applications being permitted if they would harm Sites of Special Scientific Interest, as it would be a breach of that duty.

The Act makes it an offence intentionally to kill, injure, or take any wild bird, take, damage or destroy the nest of any wild bird, while that nest is in use or being built, or take or destroy an egg of any wild bird. Special penalties are available for offences related to birds listed on Schedule 1, for which there are additional offences of disturbing these birds at their nests, or their dependent young.

The Act makes it an offence intentionally to kill, injure or take any wild animal listed on Schedule 5, and prohibits interference with places used for shelter or protection, or intentionally disturbing animals occupying such places. Some species have lesser protection under this Act, for example white-clawed crayfish, common frog and toads are only protected from sale, and reptile species, other than smooth snake and sand lizard, are protected from intentional killing or injury, but they are not protected from disturbance and their habitat is not protected. It is also an offence intentionally to pick, uproot or destroy any wild plant listed in Schedule 8.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) dated February 2019 replaces previous Government Policy in relation to nature conservation and planning expressed in the NPPF dated March 2012.

Chapter 15 paragraph 170(d) of the NPPF 2018 says that the planning system should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.

Paragraphs 171 and 172 relate to policy for designated sites of biodiversity or landscape importance. Proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged against Local Plans policies which will distinguish between the hierarchy of international, national and locally designated sites and allocate land with the least environmental or amenity value and maintain and enhance networks of habitats and green infrastructure. Further policy is within paragraph 174, where Local Planning Authorities should within their Local Plans aim to protect and enhance biodiversity by:

- Identifying, mapping and safeguarding components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- Promoting the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

When determining planning applications Local Planning Authorities should apply the following principles:

- If significant harm resulting from a development cannot be avoided (through locating it on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused,
- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

Paragraph 176 adds protection to candidate sites of European or International importance (Special Protection Areas, Special Areas of Conservation and Ramsar sites) and also to those sites identified or required as compensatory measures for adverse effects on habitats sites, potential SPA, possible SAC listed or proposed Ramsar sites.

Paragraph 177 clarifies that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Government circular 'Biodiversity and Geological Conservation – Statutory Obligations and their Impact Within the Planning System' referenced ODPM 06/2005 has not been replaced and remains valid. It sets out the legislation regarding designated and undesignated sites and protected species and describes how the planning system should take account of that legislation. It does however pre-date the NERC Act 2006 (see below), which includes a level of protection for a further list of habitats and species regardless of whether they are on designated sites or elsewhere.

Natural Environment and Rural Communities (NERC) Act 2006

This Act includes a list of habitats and species of principal importance in England. Local Authorities are required to consider the needs of these habitats and species when making decisions, such as on planning application.

Local Planning Authority's planning policy

The Local Planning Authority will have policies relating to biodiversity conservation.

Species Legislation

The following table provides an overview of legislation with regard to species.

Protected Species	Legislation			
	Wildlife & Countryside Act, 1981	The Conservation of Habitats and Species Regulations, 2017	Natural Environment & Rural Communities (NERC) Act, 2006	Protection of Badgers Act, 1992
Plants (certain 'rare' species)	✓	✓ ⁴	✓	
Invertebrates (certain 'rare' species)	✓	✓ ⁵	✓	
White-clawed crayfish	✓		✓	
Great crested newt, natterjack toad, pool frog	✓	✓	✓	
Other amphibians	✓ ⁶		✓	
Sand lizard, smooth snake	✓	✓ ⁷	✓	
Other reptiles	✓ ⁸		✓	
Breeding birds	✓	✓	✓	
Wintering birds (certain 'rare' species)	✓	✓	✓	
Bats	✓	✓	✓	
Dormouse	✓	✓	✓	
Water vole	✓		✓	
Otter	✓	✓	✓	
Badger				✓

⁴ Nine species present in the UK, with very specialised habitat requirements, are European Protected Species.

⁵ Fisher's estuarine moth, large blue butterfly and lesser whirlpool ram's-horn snail are European Protected Species.

⁶ The four other native amphibian species (smooth and palmate newts, common frog and common toad) are only protected against trade under this act.

⁷ Smooth snake and sand lizard are European Protected Species.

⁸ The four other native reptile species (common lizard, slow worm, grass snake and adder) are protected against intentional killing, injury and trade under this act.

Gravesham Borough Council

Appendix 2

Gravesham Borough Council

Appendix 3

Former Battle of Britain Site, Coldharbour Road, Gr

Headline Results

Return to
results menu

On-site baseline	Habitat units	1.08
	Hedgerow units	0.01
	River units	0.00
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	1.80
	Hedgerow units	0.43
	River units	0.00
On-site net % change (Including habitat retention, creation & enhancement)	Habitat units	48.50%
	Hedgerow units	4234.03%
	River units	0.00%
Off-site baseline	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.82
	Hedgerow units	0.42
	River units	0.00
Total on-site net % change plus off-site surplus (including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	48.50%
	Hedgerow units	4234.03%
	River units	0.00%
Trading rules Satisfied?	Yes ✓	

[Return to results menu](#)

Trading Summary		
Distressness Group	Trading Rule	Trading Satisfied?
Very High	Requires <u>immediate</u> action by the manager. X	Yes ☒
High	Some habitat required. +	Yes ☒
Medium	Some disturbance required. =	Yes ☒
Low	Some disturbance or better habitat required. -	Yes ☒

[illegible]

Very High Distinctiveness Summary	
Very High Distinctiveness Units available to offset lower distinctiveness defect	0.00

[illegible]

High Distinctiveness Summary	
High Distinctiveness Units available to offset lower distinctiveness deficit	0.00
Total Deficit: Like for like not satisfied	0.00

[illegible]

Medium Distinctiveness Summary	
Medium Distinctiveness Units available to offset lower distinctiveness deficit	0.87
Medium Distinctiveness Broad Habitat Deficit to be offset by trading up	0.00
Higher distinctiveness surplus units minus Medium Distinctiveness Broad Habitat Deficits	0.00
Cumulative surplus of units	0.87

[illegible]

Low Distinctiveness Summary	
Low Distinctiveness Not Chosen in Units	-0.35
Cumulative scores of units	0.32