AMENITYTREE

ENVIRONMENTAL PLANNING CONSULTANTS

EXAMINATION OF THE TELFORD AND WREKIN LOCAL PLAN REVIEW

HEARING STATEMENT

MATTER 6, ISSUE 4

Draft Policy NE2 (Trees, hedgerows and woodland)

Draft Policy NE3 (Biodiversity)

Draft Policy NE4 (Site Greening Factor)

Prepared for: Montague Land Midlands Limited
On behalf of F. Wallace & J Templeton
Long Barn Stables
Chetwynd Aston
Newport
TF10 9LE

Prepared by Simon Brain.

Managing Director. PGCE (Bio. Rec.)

Version 1 - 16.01.20.26

MATTER 6, ISSUE 4 - HEARING STATEMENT IN RELATION TO TELFORD AND WREKIN COUNCIL REVIEW DRAFT POLICIES NE3 (BIODIVERSITY) AND NE4 (SITE GREENING FACTOR).

1.0 Introduction

1.1 My name is Simon Brain *BA (Hons) RFS Cert Arb Tech Cert Arb P G Cert (Bio Rec)*, I am the Managing Director at Amenity Tree managing arboriculture, ecology and landscape in the environmental planning system for over 25 years.

I am a chartered arboriculturist and practicing ecologist. I have been working with Biodiversity Net Gain (BNG) since its inception and have experience working with the Department of Education using the Development/Urban Greening Factor (D/UGF). This experience is directly relevant to the Matters raised in relation to the draft policies NE2 (Trees, hedgerows and woodland); NE3 (Biodiversity); and NE4 (Site Greening Factor).

2.0 Brief

2.1 I am appointed by Montague Land Midlands Limited (the developer) who are the proposed developers of Allocation HO28 (Longbarn Stables). The developer holds an Option Agreement over the land. This Hearing Statement is submitted jointly on behalf the developer and the landowners F. Wallace & J Templeton.

2.2 I have been asked to respond to the following questions as cited below in section 4.0 which broadly probes the consistency of the emerging policies with national policy, the specified means and methods by which tree protection (include relevant policy docs) is determined, BNG aspirations of the Local Planning Authority (LPA) are to be delivered; and the role of Local Nature Network Recovery Strategy (LNRS) and minimum criteria scores for the (U/DGF).

2.3 I have been asked to make representations to the planning inspectors to be considered alongside the evidence provided by the LPA to support the policies. These will be analysed together with any representations which have been put forward by local people and other interested parties such as developers, allowing the planning inspector to consider any “main modifications” which can include amendments to draft

policy wording, so as to ensure that housing allocations, infrastructure and other aspects of the plan are genuinely deliverable.

2.4 National policy in the National Planning Policy Framework (the Framework) in paragraph 36 requires that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound.

2.5 Plans are judged to be 'sound' if they meet the criteria within this paragraph, of which most relevant here if the draft policies are:

> b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
>
> d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.6 It is noted that the tests of soundness to draft local plan policies will be applied in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.

3.0 Background

3.1 Proposed allocation Site HO28 comprised of a traditional brick built longbarn, together with several large stable buildings, riding arenas and paddocks, surrounded by hedgerows and with several clusters of trees on the boundaries and within th site.

3.2 Following the conversion of the traditional barn into 2no. dwellings, the site is now proposed the remainder of the Site will be allocated within the emerging plan for residential redevelopment of 15no. dwellings. The proposal has support from the landowners, who were the original proponents of the allocation. The Site is in Telford and Wrekin Council area, whereby it is proposed to allocate the land in the emerging Local Plan for 15no. dwellings under draft policy HO1.

3.3 Within this statement, I will comment upon draft emerging policies NE2; NE3 and NE4.

4.0 Draft Policy NE2 Trees, hedgerows and woodlands

4.1 Draft Policy NE2 (Trees, hedgerows and woodlands) requires, amongst other things, that assessments should:

> "b) use ward level canopy data and woodland opportunity mapping provided by the Council to inform the level and type of tree planting proposed; c) Use climate and disease resistant tree species with a 50:50 native and non-native tree mix; where appropriate) provide a Landscape Management Plan (LM) for the lifetime of the development".

Do you oppose or support these aspects of the policy?

4.2 There is no reason to object to this policy in principle or main substance.

4.3 It is a broad policy which appears possibly to be based on British Standard BS5837:2012 Trees in relation to design, demolition and construction," providing guidance for managing trees during development to ensure a sustainable relationship between structures and existing vegetation. It details a process involving tree surveys, categorizing trees (A, B, C, U), assessing Root Protection Areas (RPAs), and creating protection plans (Tree Protection Plan, Arboricultural Impact Assessment Arboricultural Method Statement) for planning applications, ensuring trees are protected during construction and new planting is considered. The draft policy is supported by the Telford and Wrekin Local Plan Review Feb 2025 and 2023 which introduced a local dataset. The use of ward level canopy data (average % coverage by ward) and woodland opportunity mapping aims to ensure that tree planting opportunities are available to applicants.

4.4 However, the policy could be made clearer. Presently in its drafted form, it is not clear if local ward % coverages will apply towards, or what the targets for planning applications will be in relation to ward canopy cover, if at all. Additionally, if there are no targets what then is the purpose of including ward data?

4.5 Clarification is also needed with regards to the wording of climate and disease resistant trees with a 50:50 native and non-native tree mix and where this would be applicable.

Do you have any concerns about its impacts on the development proposals?

4.6 Broadly, I have no significant concerns, subject to resolving the above points of clarification and how the policy will be applied in practice.

Is the approach in Criterion 3 consistent with national policy?

The National Planning Policy Framework 2024 and the 16th December 2025 draft do not cover the specifics of tree replanting ratios.

4.7 In my view, the use of a 50/50 native and non-native species mix is confusing. This is because BNG requires a 70% native content to achieve a good condition, meaning that the requirement potentially conflicts with other statutory requirements. Compliance with the LPA's drafted policy with a 50/50 native mix will preclude developers attaining higher BNG scores using urban tree habitats.

Are the circumstances in which tree loss would be supported sufficiently clear?

4.8 The circumstances in which trees loss will be supported are relatively clear, as the removal of ancient woodland / irreplaceable habitats will not be supported (unless wholly exceptional reasons are provided). This is consistent with national policy.

4.9 However, the policy should be clarified further by making reference to BS5837. Thiswould also help for example, by putting the categorisation of trees from A,B,C, Veteran and U on a policy footing within the Local Plan. Normally category C and U trees, and in some instances Cat B as defined by BS5837:2012 can be removed for development.

5.0 Policy NE3 (Biodiversity Net Gain) Criterion 1 and 2

5.1 Policy NE3 (Biodiversity Net Gain) criterion 1 and 2 requires that all new development should deliver biodiversity net gains. Presently, this is a statutory requirement in most instances – however, emerging legislation is likely to see changes to this. Therefore, the policy should be reviewed immediately prior to adoption.

5.2 The draft policy requires that Major developments (as defined by the planning legislation) should deliver in excess of the statutory requirement of 10% biodiversity

net gain, with an aspiration to achieve 20%, subject to viability. BNG should be delivered onsite, unless it has been demonstrated that such provision is not feasible.

Do you oppose or support these aspects of the policy?

5.3 I strongly disagree with the policy. This is because there is a lack of clarity over what level of percentage gain is acceptable to the LPA for all future applications and it could risk imposing a requirement of viability assessments on schemes that would not otherwise require them. The aspiration for a level above 10% is not in line with The Environment Act or national policy and generates real risks of delaying and inadvertently complicating or loading additional costs onto development sites.

Do you have any concerns about its impacts on the development proposals

5.4 Yes, the level of BNG that the LPA will accept to be policy compliant is not clear. The lawful minimum is 10% and the LPA aspires to 20%. e.g. would a planning application with a biodiversity gain of 10.1% be considered unacceptable? If 10% can be achieved on-site, but off-site contributions are required to achieve greater, will a Section 106 Agreement and financial contributions then be triggered? Even if the development could buy or create more biodiversity units on or off site, why would that applicant be subjected to a score above the legal minimum?

5.5 The LPA refers to a forthcoming research paper “Natural Environment Topic Paper” which it states will set out the impact on viability of delivering in excess of 10% is broadly limited to the initial statutory 10%. However, this paper is in draft format and whilst this may indeed prove to be the case for on-site delivery; in my experience 30+% of BNG schemes since inception of BNG have required off site mitigation to deliver the mandatory 10%. Therefore in these circumstances, habitat banks charge a fixed rate set by the open market, so any scheme requiring off site mitigation will be fixed cost for these units, and most importantly to the satisfaction of the LPA where a minimum percentage is not expressed.

5.6 Much of the aspiration to deliver local units will be based around availability of habitats at local habitat banks and the cost of off-setting will be higher still if there are insufficient BNG sites available locally, as the spatial risk multiplier in the BNG Metric will increase

if the BNG is bought outside of the local area or National Character Area. In this case there are 3 National Character Areas.

5.7 The impact of an open trading market for off-site credits means that applicant's will be subject to fluctuations in availability and pricing. This could have unknown (and as yet untested) consequences for developments coming forward in the borough. It is not apparent that the impact on viability of development has been assessed.

Is the aspiration for qualifying development to achieve 20% BNG, subject to viability, justified and consistent with national policy and guidance?

5.8 No there are no references in the NPPF December 2024 to specific BNG targets. National policy only requires that those gains are "measurable" and "secured".

5.9 The Environment Act specifies a minimum mandatory improvement of 10% therefore this is the lawful minimum requirement for biodiversity units in the UK. Because this is UK legislation it is my view that this should be stated as a minimum requirement and take precedence over draft policies adopted at a local level. The minimum requirement is stated in 7.14 of the draft policy NE3, but the overall policy is unclear for the reasons explained above.

5.10 Is it clear, so as to be effective, what is expected from development proposals? In my view it is not, there is fundamental uncertainty as to what level of percentage gain is considered acceptable to the LPA and how that will be applied in practice.

5.11 As a result, in my opinion, the policy is unsound because it is not justified, effective or consistent with national policy. It is not clear, so as to be effective,

6.0 Draft Policy NE3 (Biodiversity Net Gain) Criterion 4

6.1 Draft Policy NE3 (Biodiversity Net Gain) criterion 4 requires, amongst other things, that BNG provision should be informed by the emerging Shropshire and Telford & Wrekin Local Nature Recovery Strategy to demonstrate that it is locally appropriate and follow the Lawton Principles of delivering more, bigger, better and joined up habitats.

Do you oppose or support these aspects of the policy? Do you have any concerns about its impacts on the development proposals?

6.2 The LNRS is a critical mapping system for the calculation of strategic significance aspects of BNG and without reference to it, where relevant, a full biodiversity assessment cannot be achieved.

6.3 I support this and have no concerns about impacts on development proposals.

7.0 Draft Policy NE4 (Development Greening Factor)

7.1 Draft Policy NE4 (Development Greening Factor) requires, amongst other things, under Criteria 1 and 2, *"that all major development proposals must contribute towards the greening of the borough through the integration of multifunctional green and blue infrastructure within a development's site design, subject to viability. All major residential development proposals, or proposals that are predominately residentially led, should meet a minimum Greening Factor of 0.4."*

7.2 Criterion 4 continues, *"Where the Greening Factor cannot be met on site, then the council will work with applicants to identify offsite opportunities to enhance local green infrastructure. This would be secured by planning conditions and/or obligations and delivered in line with locally identified needs."*

Do you oppose or support these aspects of the policy?

7.3 I strongly oppose this policy as it my view it represents a duplicity with BNG, and would be at risk of confusing applicants and undermining the effectiveness of BNG. Both of the systems effectively aim to enhance and increase nature conservation, yet BNG

already has a statutory footing which has been exenstively consulted upon and adopted nationally across the UK. Unlike the proposed DGF policy, BNG has a framework of secondary markets and a sufficiently clear assessment tool around it.

7.4 Do you have any concerns about its impacts on the development proposals? In particular, please consider your view on

a. Is there justification for the DGF in addition to BNG? Is there evidence to show the Greening Factors of 0.4 for major residential-led developments is deliverable, taking account of other Plan requirements?

b. How is delivery of the DGF expected to work alongside policies NE1 to NE3? Is this clear enough for the Plan to be effective?

7.5 Here I shall use the terms UGF and DGF to mean the same thing in practice. UGF is not currently used in most LPA areas, it is a regional planning policy requirement, where applicable (for example Essex County Council who have emerging UGF policy). But it is otherwise relatively rare across the UK planning system.

7.6 The purpose of UGF is to guide developers in creating more sustainable, biodiverse, and pleasant urban environments by requiring a minimum amount and quality of green infrastructure. The primary purpose of Biodiversity Net Gain (BNG) is to ensure that new land development leaves the natural environment in a measurably better state than it was before. There is therefore a fundamental similarity between the two systems for biodiversity creation within the planning system, but different methods exist between the systems for measuring biodiversity with no support provided to ensure the use of UGF can support mandatory biodiversity net gain requirements, in this case.

7.7 DGF is largely a quantitative tool, rather than a qualitative one, measuring only the area coverage of ‘greening’, based on surface types and habitat types. Achieving compliance with a 0.4 figure, does not per se equate to meaningful and high-quality design that is beneficial for the environment or its users.

7.8 Under UGF the sites baseline condition is not factored in, meaning that relative gains from the baseline cannot be calculated and are not considered – there is no ‘in-built’ mechanism to recognise enhancement over a poorly performing baseline. UGF has

been adopted in London, but evidence on its effectiveness is scant and no evidence is presented by the LPA to indicate Telford & Wrekin is in a similar position to London in terms of its need for urban greening. There are notable and significant differences in the spatial context and development pressures in the south of England. There is insufficient evidence to demonstrate that the approach is *justified*.

7.9 There are inconsistencies between the BNG and UGF systems, including for example, a simple sedum green roof that scores well for UGF but offers only a low value score under a BNG assessment.

7.10 There are no maintenance requirements within DGF hence there are no methods by which the intended improvements can be gained on the site. The 0.4 UGF figure could be degraded over time, particularly if the surface were to be located within domestic gardens which are suspectable to 'urban creep' such as removal of trees, new areas of hardstanding and extensions to dwellings themselves.

7.11 Strategic solutions for shortfalls can include Vertical Greening in UGF. In my experience the fiscal aspects of these proposals are rarely affordable.

7.12 It is not clear how UGF inter-relates to BNG requirements or whether it can be used in viability discussions. It is unclear from the policy if the level of Urban Greening that would be required through the policy relates to the mandatory 10%, if at all.

7.13 If the draft DGF policy NE4 is expected to work alongside policies NE1 to NE3, then there is no information as to how this will work in practical terms, therefore this is not clear enough for the Plan to be *effective*.

7.14 .

7.15 The UGF User Guidance (January 2023) states that the use of UGF policies that define specific urban greening objectives for locations and land uses and can help to set the quantity and quality of GI that should be delivered on-site. However, this is not set out in Telford and Wrekin Policy NE4 (Development Greening Factor).

7.16 The UGF user guidance also states that planning authorities may also choose to publish Supplementary Planning Guidance (SPG) or Design Guides that reflect local

contexts and priorities, as in the case of London. However, in this case, without advance sight of any proposed SPG it is unclear how the policy would function.

7.17 To assist Inspector's, I have completed a comparative analysis between the two approaches in a 'baseline case study' that I have provided overleaf:

Basic case study

In this case study, I have used my experience in BNG to determine a "typical site" in terms of its baseline and proposals having worked in the BNG sector since its inception. The typical site used as a reference tool is an urban brownfield site measuring 1ha in site area, situated on the periphery of a built up area of a town.

BNG Baseline

- 50% urban sealed 50% modified grassland in poor condition.

Bng Proposed

- 65% urban sealed 0.685Ha
- 25% urban veg gardens 0.25Ha
- 5% Neutral grassland in moderate condition 0.05Ha
- 5% SUDS 0.05Ha
- 15 trees covering 0.0611Ha

The above proposals would result in a score of 10.88% and therefore would satisfies trading rules and the majority of LPA policies that require a 10% BNG uplift

Area habitat summary	
Total Net Unit Change	0.11
Total Net % Change	10.88%
Trading Rules Satisfied	Yes ✓

Urban Greening Approach

The DFG assessment for the same site has included the generic proposals for development, as follows.

- Semi-natural vegetation established on site covers 500Sqm of neutral grassland, as proposed.
- Standard individual trees (10x10m) at maturity provides 1,500SqM.
- Amenity grassland covering 2,500SqM.
- A rain garden / SUDS covering 500Sqm.

The results of the UGF are a final factor of 0.29 will apply, meaning that the Site would fail to achieve the 0.4UGF required by the draft policy

7.18 In this case and even though the applicant has attained the lawful mandatory 10% BNG they are over 25+% short in creating the 0.4 urban greening factor that is seemingly required for planning approval if draft policy NE4 were to be adopted.

7.19 The lack of clarity over what the minimum threshold for BNG will be remains an issue because a site that could otherwise deliver 10% could fail to be policy compliant because it cannot satisfy the 20% threshold. This in turn would trigger number of off-site contributions to a unspecified level meaning off site contributions cannot be calculated because there is no specified percentage to acquire. That could well impact the viability of the Allocations

7.20 Taking this forward, it suggests that even a fully BNG compliant residential-led development would not be policy compliant, taking account of UGF requirements. Furthermore, it is not possible from the draft policy to determine how this shortfall is managed. This places doubt on the deliverability of the draft plan, its justification and evidence base.

7.21 In the case that a planning application does not meet the 0.4 figure the draft NE4 states the Council will “work with the applicant to identify off site opportunities to enhance local green infrastructure by planning condition.” Moreover, the mandatory BNG has already identified these off-site enhancements so a duality of policy and financial penalisation will apply to applicants. There is no schedule of cost associated with a <0.4 result or how the LPA will determine the means, methods or cost of enhancing local green infrastructure. As the viability of such off-site contributions has not been examined, it begins to introduce doubt as to the deliverability of proposed Allocations.

7.22 In my opinion, in order to ensure that the development plan policies and its proposed allocations are deliverable; policy NE4 should be deleted from the Plan.

Appendix 1 BNG matric for case study and UGF calculation for case study

Urban Greening Factor User Guide Spreadsheet - Natural England Green Infrastructure Framework Version 1.1 31012023

Excel Spreadsheet for calculating the Urban Greening Factor (UGF)
Refer to UGF User Guide for description and specification of surface cover types and guidance on completing the UGF calculation
The applicant should provide area figures for the cells highlighted in yellow and all area figures are to be in Square Meters (m2)

No.	Surface Cover Type	Area (m2)	Factor	Value	Notes
1	Semi-natural vegetation and wetlands retained on site (including existing / mature trees)	0.00	1.0	0.00	
2	Semi-natural vegetation established on site	500.00	1.0	500.00	Neutral grassland created
3	Standard / semi-mature trees (planted in connected tree pits)	0.00	0.9	0.00	
4	Native hedgerow planting (using mixed native species)	0.00	0.8	0.00	
5	Standard / semi-mature trees (planted in individual tree pits)	1,500.00	0.7	1,050.00	10X10M tree providing 100Sqm per tree is 1500Sqm
6	Food growing, orchards and allotments	0.00	0.7	0.00	
7	Flower rich perennial and herbaceous planting	0.00	0.7	0.00	
8	Single Species or mixed hedge planting (including linear planting of mature shrubs)	0.00	0.6	0.00	
9	Amenity shrub and ground cover planting	0.00	0.5	0.00	
10	Amenity grasslands including formal lawns	2,500.00	0.4	1,000.00	
11	Intensive green roof (meets the Green Roof Organisation / GRO Code)	0.00	0.8	0.00	
12	Extensive biodiverse green roof (meets the GRO Code, may include Biosolar)	0.00	0.7	0.00	
13	Extensive green roof (meets GRO Code)	0.00	0.5	0.00	
14	Extensive sedum only green roof (does not meet the GRO Code)	0.00	0.3	0.00	
15	Green facades and modular living walls (rooted in soil or with irrigation)	0.00	0.5	0.00	
16	Wetlands and semi-natural open water	0.00	1.0	0.00	
17	Rain gardens and vegetated attenuation basins	500.00	0.7	350.00	
18	Open swales and unplanted detention basins	0.00	0.5	0.00	
19	Water features (unplanted and chlorinated)	0.00	0.2	0.00	
20	Open aggregate and granular paving	0.00	0.2	0.00	
21	Partially sealed and semi-permeable paving	0.00	0.1	0.00	
22	Sealed paving (including concrete and asphalt)	6,850.00	0.0	0.00	

Total Value	2,900.00
Total Development Site Area (m2)	10,000.00
Urban Greening Factor	**0.29**

Detailed Results

Return to results menu

Summary Figures

Net project biodiversity units (Including all on-site & off-site habitat retention / creation)	*Habitat units*	0.11
	Hedgerow units	0.00
	Watercourse units	0.00
Total project biodiversity % change (Including all on-site & off-site habitat creation + retained habitats)	*Habitat units*	10.88%
	Hedgerow units	0.00%
	Watercourse units	0.00%

Combined habitat retention and enhancement

	Habitats	Hedgerows	Watercourses
Total on-site and off-site baseline area / length	1.00	0.00	0.00
Total on-site and off-site baseline units	1.00	0.00	0.00
Total on-site and off-site baseline area / length retained	0.00	0.00	0.00
Total on-site and off-site baseline units retained	0.00	0.00	0.00
Total on-site and off-site area / length proposed for enhancement	0.00	0.00	0.00
Total on-site and off-site baseline units proposed for enhancement	0.00	0.00	0.00
Total on-site and off-site baseline area / length lost	1.00	0.00	0.00
Total on-site and off-site baseline units lost	1.00	0.00	0.00

Area Habitats

Area habitats

On-site change by broad habitat type

Habitat group	Baseline: On-site existing area	Baseline: On-site existing value	Post-development on-site: On-site proposed area	Post-development on-site: On-site proposed value	On-site change: On-site area change	On-site change: On-site unit change
Cropland	0.00	0.00	0.00	0.00	0.00	0.00
Grassland	0.50	1.00	0.05	0.33	-0.45	-0.67
Heathland and shrub	0.00	0.00	0.00	0.00	0.00	0.00
Lakes	0.00	0.00	0.00	0.00	0.00	0.00
Sparsely vegetated land	0.00	0.00	0.00	0.00	0.00	0.00
Urban	0.50	0.00	0.95	0.60	0.45	0.60
Wetland	0.00	0.00	0.00	0.00	0.00	0.00
Woodland and forest	0.00	0.00	0.00	0.00	0.00	0.00
Intertidal sediment	0.00	0.00	0.00	0.00	0.00	0.00
Coastal saltmarsh	0.00	0.00	0.00	0.00	0.00	0.00
Rocky shore	0.00	0.00	0.00	0.00	0.00	0.00
Coastal lagoons	0.00	0.00	0.00	0.00	0.00	0.00
Intertidal hard structures	0.00	0.00	0.00	0.00	0.00	0.00
Watercourse footprint	0.00	0.00	0.00	0.00	0.00	0.00
Individual trees	0.00	0.00	0.06	0.17	0.06	0.17

Off-site change by broad habitat type

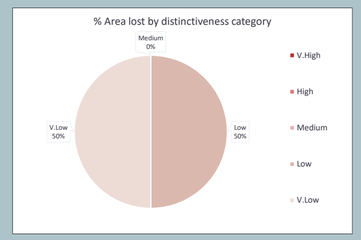
Habitat group	Baseline: Off-site existing area	Baseline: Off-site existing value	Post-development off-site: Off-site proposed area	Post-development off-site: Off-site proposed value	Off-site change: Off-site area change	Off-site change: Off-site unit change
Cropland	0.00	0.00	0.00	0.00	0.00	0.00
Grassland	0.00	0.00	0.00	0.00	0.00	0.00
Heathland and shrub	0.00	0.00	0.00	0.00	0.00	0.00
Lakes	0.00	0.00	0.00	0.00	0.00	0.00
Sparsely vegetated land	0.00	0.00	0.00	0.00	0.00	0.00
Urban	0.00	0.00	0.00	0.00	0.00	0.00
Wetland	0.00	0.00	0.00	0.00	0.00	0.00
Woodland and forest	0.00	0.00	0.00	0.00	0.00	0.00
Intertidal sediment	0.00	0.00	0.00	0.00	0.00	0.00
Coastal saltmarsh	0.00	0.00	0.00	0.00	0.00	0.00
Rocky shore	0.00	0.00	0.00	0.00	0.00	0.00
Coastal lagoons	0.00	0.00	0.00	0.00	0.00	0.00
Intertidal hard structures	0.00	0.00	0.00	0.00	0.00	0.00
Watercourse footprint	0.00	0.00	0.00	0.00	0.00	0.00
Individual trees	0.00	0.00	0.00	0.00	0.00	0.00

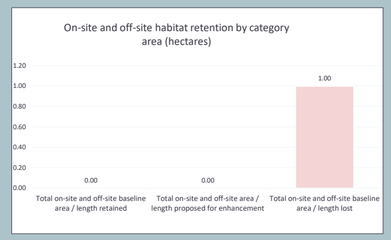
Combined on-site and off-site change by broad habitat type

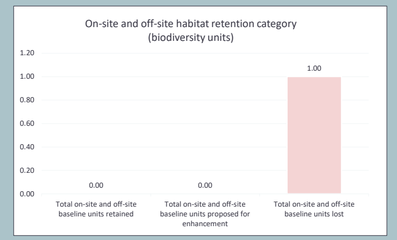
Habitat group	Baseline: Combined existing area	Baseline: Combined existing value	On-site and off-site post-development: Combined proposed area	On-site and off-site post-development: Combined proposed value	Combined change: Combined area change	Combined change: Combined unit change
Cropland	0.00	0.00	0.00	0.00	0.00	0.00
Grassland	0.50	1.00	0.05	0.33	-0.45	-0.67
Heathland and shrub	0.00	0.00	0.00	0.00	0.00	0.00
Lakes	0.00	0.00	0.00	0.00	0.00	0.00
Sparsely vegetated land	0.00	0.00	0.00	0.00	0.00	0.00
Urban	0.50	0.00	0.95	0.60	0.45	0.60
Wetland	0.00	0.00	0.00	0.00	0.00	0.00
Woodland and forest	0.00	0.00	0.00	0.00	0.00	0.00
Intertidal sediment	0.00	0.00	0.00	0.00	0.00	0.00
Coastal saltmarsh	0.00	0.00	0.00	0.00	0.00	0.00
Rocky shore	0.00	0.00	0.00	0.00	0.00	0.00
Coastal lagoons	0.00	0.00	0.00	0.00	0.00	0.00
Intertidal hard structures	0.00	0.00	0.00	0.00	0.00	0.00
Watercourse footprint	0.00	0.00	0.00	0.00	0.00	0.00
Individual trees	0.00	0.00	0.06	0.17	0.06	0.17

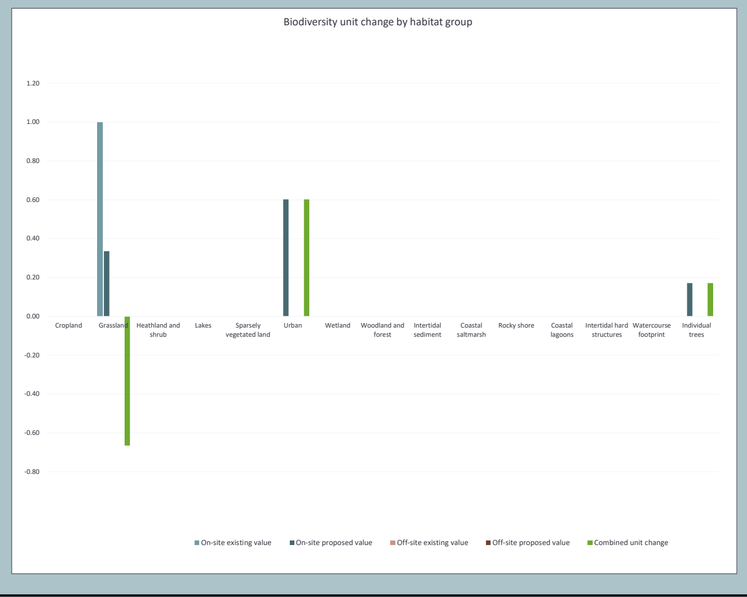
Combined area lost from baseline(s) by distinctiveness band

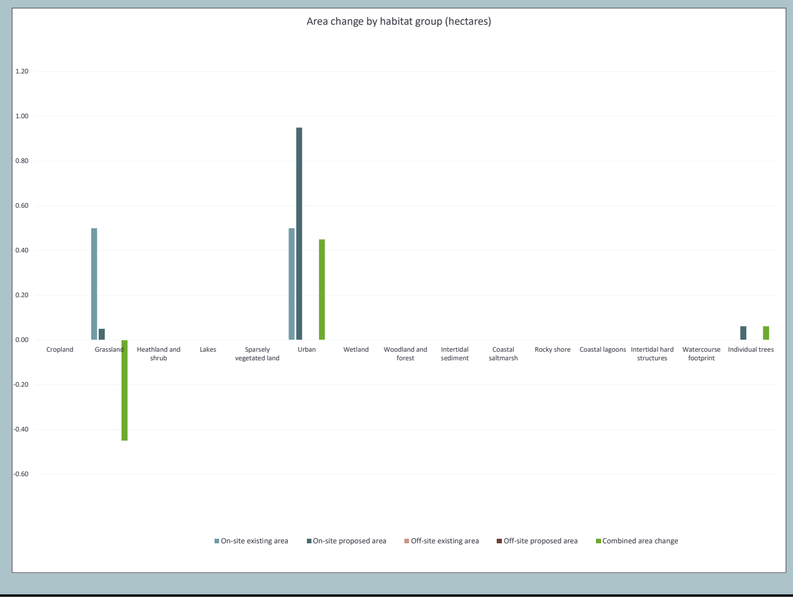
Category	Area lost (hectares)	Area lost (%)
V.High	0	
High	0	
Medium	0	
Low	0.5	50
V.Low	0.5	50











Hedgerows and Lines of Trees

Hedgerows and lines of trees

On-site change by hedgerow type

Hedgerow type	Baseline: On-site existing length	Baseline: On-site existing value	Post-development on-site: On-site proposed length	Post-development on-site: On-site proposed value	On-site change: On-site length change	On-site change: On-site unit change
Species-rich native hedgerow with trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Species-rich native hedgerow with trees	0.00	0.00	0.00	0.00	0.00	0.00
Species-rich native hedgerow - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow with trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00

Combined length lost from baseline(s) by distinctiveness band

Category	Length lost (km)	Length lost (%)
V.High	0	
High	0	

Hedgerows and Lines of Trees

Species-rich native hedgerow	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow with trees	0.00	0.00	0.00	0.00	0.00	0.00
Ecologically valuable line of trees	0.00	0.00	0.00	0.00	0.00	0.00
Ecologically valuable line of trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow	0.00	0.00	0.00	0.00	0.00	0.00
Line of trees	0.00	0.00	0.00	0.00	0.00	0.00
Line of trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Non-native and ornamental hedgerow	0.00	0.00	0.00	0.00	0.00	0.00

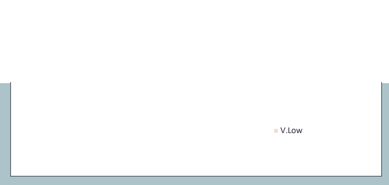
Off-site change by hedgerow type

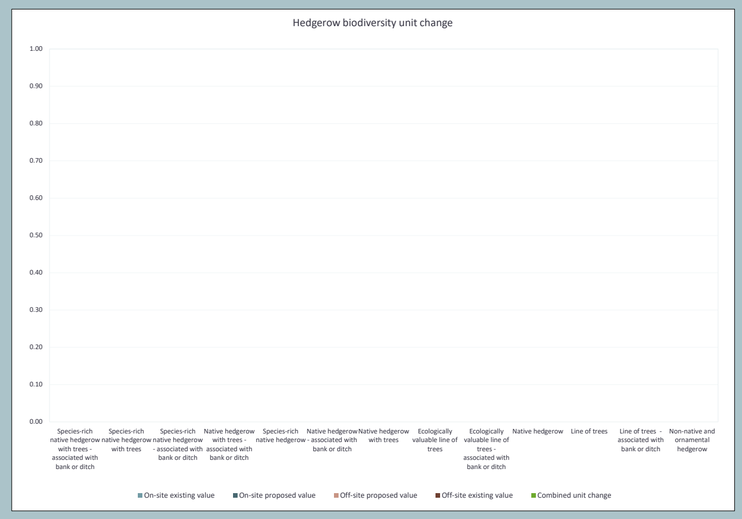
Hedgerow type	Off-site baseline		Post-development off-site		Off-site change	
	Off-site existing length	Off-site existing value	Off-site proposed length	Off-site proposed value	Off-site length change	Off-site unit change
Species-rich native hedgerow with trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Species-rich native hedgerow with trees	0.00	0.00	0.00	0.00	0.00	0.00
Species-rich native hedgerow - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow with trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Species-rich native hedgerow	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow with trees	0.00	0.00	0.00	0.00	0.00	0.00
Ecologically valuable line of trees	0.00	0.00	0.00	0.00	0.00	0.00
Ecologically valuable line of trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow	0.00	0.00	0.00	0.00	0.00	0.00
Line of trees	0.00	0.00	0.00	0.00	0.00	0.00
Line of trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Non-native and ornamental hedgerow	0.00	0.00	0.00	0.00	0.00	0.00

Combined on-site and off-site change by hedgerow type

Hedgerow type	Baseline		Post-development		Change	
	Combined existing length	Combined existing value	Combined proposed length	Combined proposed value	Combined length change	Combined unit change
Species-rich native hedgerow with trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Species-rich native hedgerow with trees	0.00	0.00	0.00	0.00	0.00	0.00
Species-rich native hedgerow - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow with trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Species-rich native hedgerow	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow with trees	0.00	0.00	0.00	0.00	0.00	0.00
Ecologically valuable line of trees	0.00	0.00	0.00	0.00	0.00	0.00
Ecologically valuable line of trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Native hedgerow	0.00	0.00	0.00	0.00	0.00	0.00
Line of trees	0.00	0.00	0.00	0.00	0.00	0.00
Line of trees - associated with bank or ditch	0.00	0.00	0.00	0.00	0.00	0.00
Non-native and ornamental hedgerow	0.00	0.00	0.00	0.00	0.00	0.00

High	0	
Medium	0	
Low	0	
V.Low	0	





Watercourses

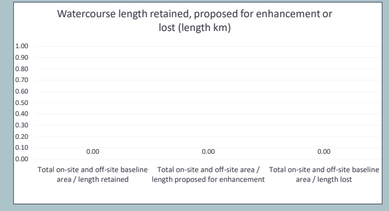
Watercourses

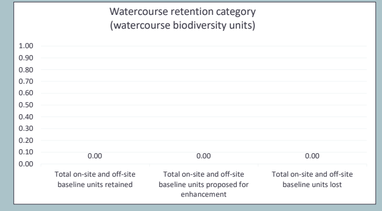
On-site change by watercourse type

Watercourse type	Baseline		Post-development on site		On-site Change	
	On-site existing length	On-site existing value	On-site proposed length	On-site proposed value	On-site length change	On-site unit change
Priority habitat	0.0	0.0	0.0	0.0	0.0	0.0
Other rivers and streams	0.0	0.0	0.0	0.0	0.0	0.0
Ditches	0.0	0.0	0.0	0.0	0.0	0.0
Canals	0.0	0.0	0.0	0.0	0.0	0.0
Culvert	0.0	0.0	0.0	0.0	0.0	0.0

Combined length lost from baseline(s) by distinctiveness band

Category	Length lost (km)	Length lost (%)
V.High	0	
High	0	
Medium	0	
Low	0	





Off-site change by watercourse type

Watercourse type	Baseline		Post development off-site		Off-site Change	
	Off-site existing length	Off-site existing value	Off-site proposed length	Off-site proposed value	Off-site length change	Off-site unit change
Priority habitat	0.0	0.0	0.0	0.0	0.0	0.0
Other rivers and streams	0.0	0.0	0.0	0.0	0.0	0.0
Ditches	0.0	0.0	0.0	0.0	0.0	0.0
Canals	0.0	0.0	0.0	0.0	0.0	0.0
Culvert	0.0	0.0	0.0	0.0	0.0	0.0

Combined on-site and off-site change by watercourse type

Watercourse type	Baseline		Post-development on-site		On-site change	
	Combined existing length	Combined existing value	Combined proposed length	Combined proposed value	Combined length change	Combined unit change
Priority habitat	0.0	0.0	0.0	0.0	0.0	0.0
Other rivers and streams	0.0	0.0	0.0	0.0	0.0	0.0
Ditches	0.0	0.0	0.0	0.0	0.0	0.0
Canals	0.0	0.0	0.0	0.0	0.0	0.0
Culvert	0.0	0.0	0.0	0.0	0.0	0.0