



Biodiversity Net Gain Assessment

25 New Road, Harlington, Middlesex, UB3 5BD

Komorebi Ventures Limited

Status	Issue	Name	Date
Draft	0.1	Luke Pembroke, BSc (Hons), Assistant Ecologist	05/08/2024
Reviewed	0.2	Michelle Huang, BS, MRes DIC, Consultant Ecologist	06/08/2024
Final	1	Michelle Huang, BS, MRes DIC, Consultant Ecologist	06/08/2024

Arbtech Consultant's Contact Details:

Michelle Huang
Consultant Ecologist

Tel: 07874871278 **Email:** michellehuang@arbtech.co.uk
<https://arbtech.co.uk>

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Industry Guidelines and Standards

This report has been written with due consideration to:

- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management, Construction Industry Research and Information Association & Institute of Environmental Management and Assessment (2019). Biodiversity Net Gain – Good Practice Principles for Development.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed by Komorebi Ventures Limited to undertake a Biodiversity Net Gain (BNG) Assessment at 25 New Road, Harlington, Middlesex, UB3 5BD (hereafter referred to as “the site”). The assessment was required to inform a planning application with the London Borough of Hillingdon for the ‘the demolition of existing buildings and erection of four new residential dwellings with associated garden and hardstanding’ (hereafter referred to as “the proposed development”).

- ❖ This site generates 0.33 units of area-based habitats in its baseline. A post-development calculation must be undertaken to discern the net change of biodiversity value of site. Note area- and linear-based habitats are calculated separately within the metric and any excess biodiversity units from one cannot be used to offset deficit biodiversity units from the other.
- ❖ In order to achieve a +10% biodiversity net gain for area-based habitats, a minimum area-based unit score of **0.36** will need to be achieved.
- ❖ Habitat unit requirements to satisfy trading rules – wherein habitats that are lost to the development are compensated for in a like-for-like or like-for-better manner – cannot be discerned at this stage but should be met in order to achieve BNG.
- ❖ Landscaping recommendations can be found in section 4.1.
- ❖ If a +10% uplift cannot be achieved or if trading rules cannot be satisfied, the deficit units can be compensated for off-site. See section 4.2 for more information.
- ❖ A Biodiversity Net Gain (BNG) Management Plan must be produced for the site. This should include recommendations for the implementation, management and monitoring of the site for at least 30 years to ensure that biodiversity net gain is delivered.

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1.0 Introduction and Context

Arbtech Consulting Limited was instructed by Komorebi Ventures Limited to undertake a Biodiversity Net Gain (BNG) Assessment at 25 New Road, Harlington, Middlesex, UB3 5BD (hereafter referred to as “the site”). The assessment was required to inform a planning application with the London Borough of Hillingdon for the ‘the demolition of existing buildings and erection of four new residential dwellings with associated garden and hardstanding’ (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1.

This report should be read in conjunction with the following documents:

- ❖ Statutory DEFRA Biodiversity Metric.
- ❖ Preliminary Ecological Appraisal (PEA): 25 New Road, Harlington, Middlesex, UB3 5BD (Arbtech Consulting Ltd., 2024).
- ❖ Arboricultural Survey to BS5837:2012: 25 New Road, Harlington, Middlesex, UB3 5BD (Arbtech Consulting Ltd., 2024).

1.1 Site Location, Geology and Landscape Context

The site is located at National Grid Reference TQ 08414 77289 and has an area of approximately 0.23ha comprising buildings, hardstanding, associated vegetated garden and modified grassland with scattered trees and areas of bramble scrub. It is surrounded by off-site line of trees along its northern and eastern peripheries, an off-site hedgerow along its southern periphery, and sealed surfaces along its western periphery. It is adjacent to a large horse-grazed field on its southern and eastern boundaries. The wider landscape comprises urban-built up areas, with pockets of woodland copses and large arable fields and interspersed throughout. A site location plan is provided in Appendix 2.

1.2 BNG Informative

BNG is a specific, measurable outcome of project activities that deliver demonstrable and quantifiable benefits to biodiversity compared to the baseline situation. In order to achieve BNG, a project must be able to demonstrate that it has followed all 10 of the Principles of Biodiversity Net Gain (as outlined in the *British Standard 8683:2021 Process for Designing and Implementing Biodiversity Net Gain*).

The legalised Environment Act (2021) requires developments in England to demonstrate a measurable net gain in biodiversity and sets a target of a minimum of +10% BNG for all developments. It also stipulates that a management plan with a minimum 30-year term, should be adopted to ensure biodiversity net gain can be delivered. The requirement for biodiversity net gain is also enshrined within the National Planning Policy Framework (NPPF, 2023). As of 12th February 2024, BNG has become mandatory. Furthermore, BNG is a requirement of Policy 6.28 of the Hillingdon Local Plan Part 2: Development Management Policies (adopted in January 2020).

The DEFRA Statutory Biodiversity Metric is the latest and final version of the metric tool used to calculate BNG. It enables the calculation of habitat value pre- and post-development in order to determine the overall change in biodiversity value as a result of the proposed development. The Biodiversity Metric has separate BNG assessments for areas of habitat, hedgerows and watercourses.

The biodiversity value of a site should be maximised. However, it may not always be possible to achieve a +10% biodiversity net gain within a site and therefore the Statutory Biodiversity Metric can also account for offsite habitat creation, where land is available. Alternatively, developers can seek to provide an agreed financial contribution to an appropriate third party (such as the Local Authority, the UK Government or another landowner) to deliver the required biodiversity net gain elsewhere on their behalf.

1.3 Scope of this Report

This report assesses the biodiversity value of the site pre-development and outlines the minimum biodiversity units required to achieve a +10% net gain.

2.0 Methodology

2.1 Baseline Biodiversity Value

The baseline BNG Calculation was informed by a PEA (Arbtech Consulting Ltd., 2024). A baseline habitat plan is provided in Appendix 3.

Habitat Classification

The PEA classified the habitats on site according to UK Habitat Classification User Manual (UK Habitat Classification Working Group, 2023).

Habitat Area/Length

The area or length of each habitat was calculated using qGIS software. In calculating the area or length of each habitat, habitats which occur as two or more isolated parcels across the site were combined, where they were deemed to be of a similar composition and condition. Distinctions were made between habitats to be retained (i.e. left as found in baseline), enhanced (i.e. improved condition) or lost (i.e. destroyed by proposed development). Areas of scattered trees were calculated using the Tree Helper tool within the Statutory Biodiversity Metric. Class sizes for urban trees are set out in Table 14 of the Statutory Biodiversity Metric User Guide (Natural England, 2024).

Habitat Condition

Habitat condition was assessed using the relevant condition assessment sheets found in the Statutory Biodiversity Metric Condition Assessment Supplement (Natural England, 2024).

Strategic Significance

Strategic significance was assigned for each habitat based upon a review of the following:

- ❖ Ecological value
- ❖ Function within the landscape
- ❖ Any site or habitat allocations under the Hillingdon Local Plan (2020)

2.2 Limitations

There were no specific limitations to the assessment.

3.0 Results

3.1 Baseline Habitats

Table 1 details the baseline habitats present within the site along with their area, condition and strategic significance. A full condition assessment for each habitat (where relevant) is provided in Appendix 4.

Table 1: Baseline Biodiversity Value

Type	Habitat	Area (ha)	Description	Condition Assessment	Strategic Significance
Area-Based	Unsealed Surface	0.093ha	The site is dominated by gravel which serves as parking spaces for cars for sale.	Habitat condition pre-determined as ' N/A ' as detailed within the Statutory Biodiversity Condition Assessment Supplement.	Low Strategic Significance
	Sealed Surface	0.087ha	There are 9no. built structure on site, comprising 1no. residential dwelling (B1) and its two outbuilding sheds (O1-O2), and three large commercial buildings for the car dealership (B2-B4) and its associated outbuildings (O3-05). This habitat includes all but O3's footprint (as it is suspended over modified grasslands) as well as tarmacked/concrete access roads and paved pathways around the buildings.		
	Modified Grassland	0.025ha	Modified grasslands have begun to colonize small areas of the commercial car dealership, concentrated around the residential dwelling B1. The swaths of grasslands appear unmanaged, with varying sward heights due to the presence of various ruderals/ephemerals (average sward ~15cm). Such grasslands are DOMINATED by perennial ryegrass, with OCCASIONAL wall barley, rough meadow grass, and Yorkshire fog, and RARE barren brome. Other species interspersed within comprise FREQUENT stinging nettle, white clover, and cleavers, OCCASIONAL hawkbit sp., dock, ribwort plantain, common mallow, Herb Robert, and RARE dandelion, shepherd's purse, hedge mustard, and small-flowered willowherb. No bracken or invasive species were observed throughout the parcels of grasslands, with small amounts of bramble which have ~5% coverage. Physical damage is present, presumably resultant from pedestrian disturbance, resulting in bare ground coverage which exceeds 10% of the grassland area.	Poor: passes 4 of 7 criteria excluding essential criterion A. Assessed using the 'Grasslands Low Distinctiveness' habitat type condition sheet.	Area/compensation not in local strategy/no local strategy and no evidence to suggest the habitat is of medium strategic significance (not part of a habitat corridor or steppingstone).

Type	Habitat	Area (ha)	Description	Condition Assessment	Strategic Significance
Area-Based	Vegetated Garden	0.014ha	The vegetated areas immediately surrounding B1, the residential dwelling, is subject to private management by residents of B1. The unkempt gardens consist of large swaths of bare ground and is dominated by various ruderals/ephemerals with bramble and some introduced shrubs. The 4no. trees within the vegetated garden (T06-T09) comprise OCCASIONAL magnolia (2no.; T06 and T08) and RARE Norway spruce (1no.; T07) and common holly (1no.; T09). All trees within the vegetated garden have a Diameter at Breast Height (DBH) of less than 30.1cm, and thus are discounted from any Biodiversity Net Gain (BNG) baseline calculations due to their small size and placement within vegetated gardens. Vegetated gardens and the discounted trees are not subject to condition assessments.	Habitat condition pre-determined as ' N/A ' as detailed within the Statutory Biodiversity Condition Assessment Supplement.	Low Strategic Significance Area/compensation not in local strategy/no local strategy and no evidence to suggest the habitat is of medium strategic significance (not part of a habitat corridor or steppingstone).
	Bramble Scrub	0.006ha	Inaccessible areas of the site comprise areas of vegetated garden immediately east of O2 and immediately north of B1, as well as the region along the southern portion of the eastern periphery of the site immediately east of B2. These areas have been colonized by dense bramble-dominated scrub, with other species such as English ivy, ground ivy, nettles, cleavers, and self-set saplings of maples and hawthorn also present in low abundance.		
	Urban Trees	0.0285ha	There is a total of 11no. scattered trees on site, 7no. of which (T01-T05 and T10-T11) are present within the modified grassland and are thus considered in the baseline and subject to condition assessments. Trees within grassland areas range from early to semi-mature in age, with a species composition comprising FREQUENT common walnut (3no.; T01, T02, and T10), OCCASIONAL domesticated apple (2no.; T04 and T11), and RARE elder (1no.; T03) and wild cherry (1no.; T05). In general, the trees represent a fair to good physiological and structural condition, with the exception of T05 which has a ~800mm longitudinal cavity wound on its southwestern aspect, and multiple 50-100mm diameter decay pruning wounds on the main stem. Other trees were also noted to have light ivy cladding concentrated around the basal area. Most trees appeared to have been subject to historic pruning or crown lifting.	Moderate: passes 4 of 6 criteria. Assessed using the 'Individual Trees' habitat type condition assessment sheet	

3.2 Biodiversity Value of the Site

Full details are provided in the DEFRA Statutory Biodiversity Metric. The headline results are presented in Appendix 5.

Area-Based Habitat Units

The baseline area-based habitat value of the site is 0.33 units, comprising modified grassland of poor condition (0.05 units), vegetated garden (0.03 units), bramble scrub (0.02 units), 7no. small sized urban trees of moderate condition (0.23 units), and sealed/unsealed surfaces (no value).

4.0 Recommendations to Deliver BNG

4.1 Discussion

This site generates 0.33 units of area-based habitats in its baseline. A post-development calculation must be undertaken to discern the net change of biodiversity value of site. Note area- and linear-based habitats are calculated separately within the metric and any excess biodiversity units from one cannot be used to offset deficit biodiversity units from the other.

In order to achieve a +10% biodiversity net gain for area-based habitats, a minimum area-based unit score of **0.36** will need to be achieved.

Habitat unit requirements to satisfy trading rules – wherein habitats that are lost to the development are compensated for in a like-for-like or like-for-better manner – cannot be discerned at this stage but should be met in order to achieve BNG.

Recommendations for landscaping include:

- ❖ Retention of all trees within the modified grassland area insofar as possible. The removal of 1no. small sized tree requires up to 5no. replacement trees. Trees have specific trading rules in that its removal can only be made up for with replacement tree planting or creating habitats of higher distinctiveness, which are often impractical for urban residential development sites such as this.
- ❖ Planting of new trees within communal areas of the site (note: trees planted within private gardens do not provide additional habitat units in line with the Statutory Biodiversity Net Gain User Guide, 2024).
- ❖ Creation of communal wildflower meadow areas within site boundary in place of larger areas of private vegetated gardens.
- ❖ Maximize urban greening by provisioning green roofs or green walls, or through the use of grasscrete/cellular reinforcement system in lieu of sealed or unsealed surfaces.
- ❖ The provisioning of hedges, while beneficial for biodiversity, is not necessary as a +10% uplift for linear-based habitats is not required because there are no linear-based habitats in the baseline.

A Biodiversity Net Gain (BNG) Management Plan must be produced for the site. This should include recommendations for the implementation, management and monitoring of the site for at least 30 years to ensure that biodiversity net gain is delivered.

4.2 Biodiversity Offsetting

If a +10% net gain cannot be achieved on this site, or if trading rules cannot be satisfied, the loss of habitats can be compensated for on other off-site land owned by the client, or a financial contribution to off-site ecological enhancements within the government's approved statutory biodiversity credits scheme, or with the LPA directly through a s106 agreement is required to make up to the +10% net gain for area units. This approach is also only to be used after exhausting all possibility of achieving net gain on site or nearby, and also after exploring if any habitat can be retained on site as far as possible.

The mechanism for securing this off-setting will need to be proposed to, and confirmed by the LPA e.g., purchasing conservation credits though a registered provider, directly through the client owned or LPA offered land or another provider such as a local nature reserve or park. As well as the creation of new habitats, this should also secure the management of the proposed habitats to help achieve the desired condition for at least 30 years. This would be linked to the application through a planning obligation Section 106 (S106) agreement. The proposed habitat compensation should be of an appropriate distinctiveness to meet the trading rules of BNG. An ecology survey of the baseline habitat of any off-site land will be required to inform the baseline conditions of any land subject to off-site compensation measures. Any purchased credits (see [here](#) and [here](#)) need to provide an overall +10% net gain and satisfy trading rules.

4.3 Post Development

A Biodiversity Net Gain (BNG) Management Plan must be produced for the site. This should include recommendations for the implementation, management and monitoring of the site for at least 30 years.

4.4 Design statement

This report contains recommendations on measures for achieving BNG. These recommendations do not constitute a design for BNG. In submitting these recommendations, Arbtech Consulting has no Design Liability associated with these recommendations for BNG. The strategy sets out the criteria which the landscape team can use to design the creation and management of the site.

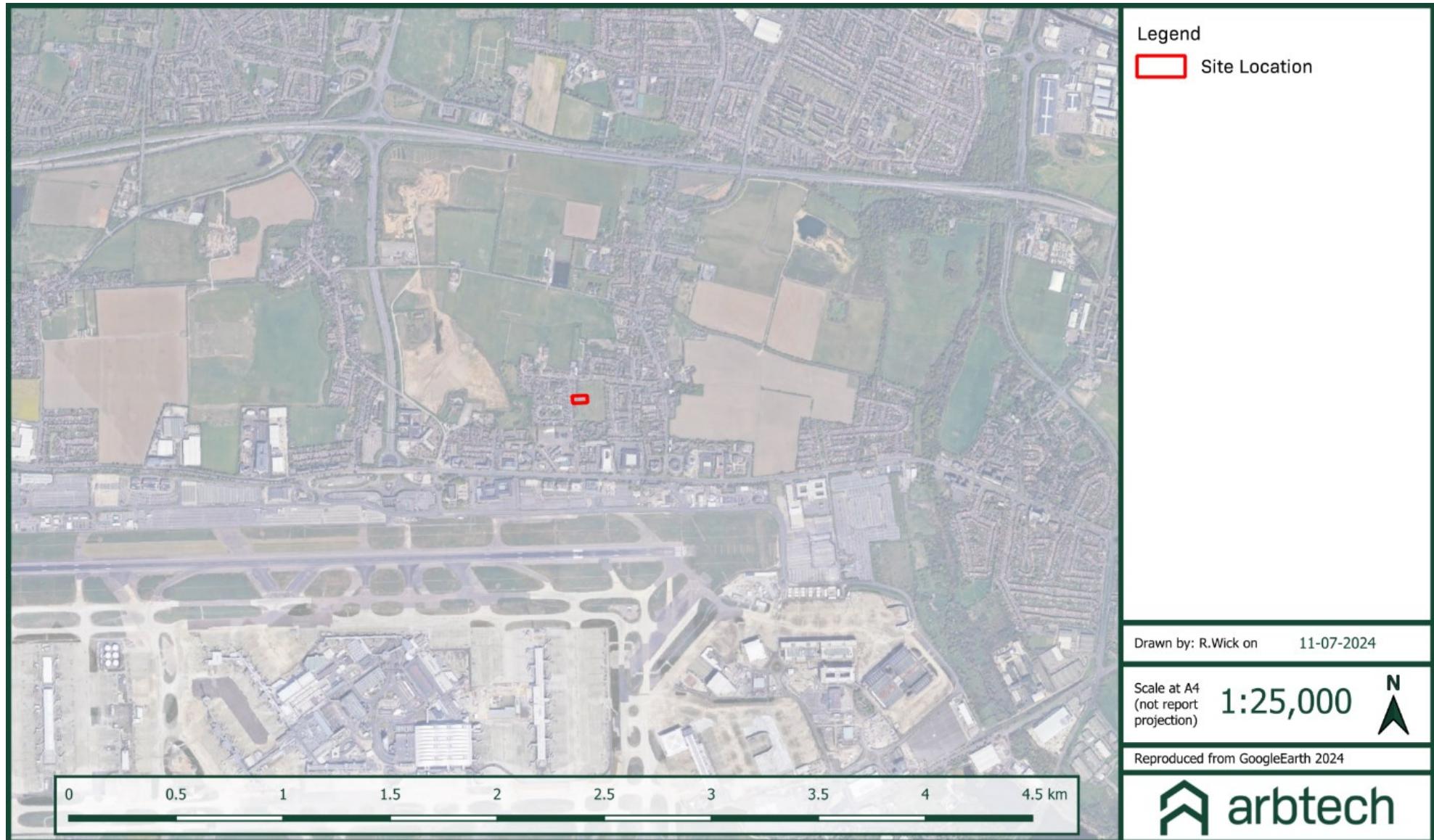
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Appendix 1: Proposed Development Plan



Appendix 2: Site Location Plan



Appendix 3: Baseline Habitat Plan



Appendix 4: Habitat Condition Assessment Sheets - Baseline

Modified Grassland: assessed using 'Grasslands Low Distinctiveness' habitat type condition sheet:

Condition Assessment Criteria:		Condition Achieved (Y/N)	Notes/Justification
A	There must be 6-8 vascular plant species per m ² , including at least 2 forbs. NB - this criterion is essential for achieving moderate condition.	N	Fewer than 6 vascular plant species per m ² .
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Y	Grassland appears unmanaged with varying sward heights.
C	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.	Y	No scattered scrub present (less than 20% coverage).
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	N	Physical damage is present, presumably resultant from pedestrian disturbance, resulting in bare ground coverage which exceeds 10% of the grassland area.
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	N	Bare ground cover exceeds 10%.
F	Cover of bracken less than 20%.	Y	No bracken observed.
G	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Y	Absence of invasive species.
Essential criterion 1 achieved (Y/N)			N
Number of criteria passed			4
Condition Assessment Result	Condition Assessment Score	Score Achieved ✕/✓	
Passes 6 or 7 of 7 criteria including passing essential criterion 1	Good (3)		
Passes 4 or 5 of 7 criteria including passing essential criterion 1	Moderate (2)		
Passes 0, 1, 2 or 3 of 7 criteria; OR 4, 5 or 6 of criteria but failing criterion 1	Poor (1)	✓	

Urban Trees; assessed using 'Individual Trees' habitat type condition sheet:

Condition Assessment Criteria		Condition Achieved (Y/N)	Notes/Justification
A	The tree is a native species (or more than 70% within the block are native species).	N	Less than 70% of trees on site are native.
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y	Individual trees automatically pass this criterion.
C	The tree is mature (or more than 50% within the block are mature).	N	No mature trees on site.
D	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.	Y	Some evidence of historic pruning or crown lifting but all trees have retained >75% of their expected canopy.
E	Natural Ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Y	Presence of ivy cladding, decaying pruning wounds and cavities.
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	More than 20% of the tree canopy area has vegetation underneath.
Number of criteria passed			4
Condition Assessment Result	Condition Assessment Score	Score Achieved x/✓	
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)		

Appendix 5: Headline BNG Results

The DEFRA Statutory Biodiversity Metric is provided as a separate excel spreadsheet.

On-site baseline	<i>Habitat units</i>	0.33			
	<i>Hedgerow units</i>	0.00			
	<i>Watercourse units</i>	0.00			
On-site post-intervention (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	0.00			
	<i>Hedgerow units</i>	0.00			
	<i>Watercourse units</i>	0.00			
On-site net change (units & percentage)	<i>Habitat units</i>	-0.33	-100.00% On-site net gain is less than target set		
	<i>Hedgerow units</i>	0.00			
	<i>Watercourse units</i>	0.00			
Off-site baseline	<i>Habitat units</i>	0.00			
	<i>Hedgerow units</i>	0.00			
	<i>Watercourse units</i>	0.00			
Off-site post-intervention (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	0.00			
	<i>Hedgerow units</i>	0.00			
	<i>Watercourse units</i>	0.00			
Off-site net change (units & percentage)	<i>Habitat units</i>	0.00	0.00%		
	<i>Hedgerow units</i>	0.00			
	<i>Watercourse units</i>	0.00			
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-0.33			
	<i>Hedgerow units</i>	0.00			
	<i>Watercourse units</i>	0.00			
Spatial risk multiplier (SRM) deductions	<i>Habitat units</i>	0.00			
	<i>Hedgerow units</i>	0.00			
	<i>Watercourse units</i>	0.00			
FINAL RESULTS					
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-0.33			
	<i>Hedgerow units</i>	0.00			
	<i>Watercourse units</i>	0.00			
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-100.00%	Total net gain achieved is less than target set ▲		
	<i>Hedgerow units</i>	0.00%			
	<i>Watercourse units</i>	0.00%			
Trading rules satisfied?		No - Check Trading Summaries ▲			
Area created must match area lost for both onsite and offsite ▲					
Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
<i>Habitat units</i>	10.00%	0.33	0.36	0.36	No additional hedgerow units required to meet target ✓ No additional watercourse units required to meet target ✓
<i>Hedgerow units</i>	10.00%	0.00	0.00	0.00	
<i>Watercourse units</i>	10.00%	0.00	0.00	0.00	