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The Churchill, Wootton Basset, Swindon

Biodiversity Net Gain (BNG) Survey Report

Final

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This report describes work commissioned by Raw Charging, by an instruction dated 18th March 2026. The Client's representative for the contract was Abraham Taiwo of Raw Charging. Jen Jones BSc MSc ACIEEM and Megan Cruise of JBA Consulting carried out this work.

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The methodology adopted and the sources of information used by JBA in providing its services are outlined in this Report. The work described in this Report was undertaken in March 2026 and is based on the conditions encountered and the information available during this period. The scope of this Report and the services are accordingly factually limited by these circumstances.

The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by JBA has not been independently verified by JBA, unless otherwise stated in the Report.

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Where field investigations are carried out, these have been restricted to a level of detail required to meet the stated objectives of the services. The results of any measurements taken may vary spatially or with time and further confirmatory measurements should be made after any significant delay in issuing this Report.

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Abbreviations

BNG	Biodiversity Net Gain
CIEEM	Chartered Institute of Ecology and Environmental Management
CRoW	Countryside and Rights of Way
DCLG	Ministry of Housing, Communities & Local Government (formerly, Department of Communities and Local Government)
Defra	Department of the Environment, Food and Rural Affairs
EV	Electric vehicle
GIS	Geographical Information System
INNS	Invasive Non-Native Species
JNCC	Joint Nature Conservation Committee
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategy
NERC	Natural Environment Research Council
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
OSGR	Ordnance Survey Grid Reference
PPG	Planning Policy Guidance
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
UKBAP	UK Biodiversity Action Plan
UKHab	UK Habitat Classification
WCA	Wildlife and Countryside Act

Definitions

DAFOR Scale	D – Dominant (>75%)
	A – Abundant (51-75%)
	F – Frequent (26-50%)
	O – Occasional (11-25%)
	R – Rare (1-10%)

Executive Summary

A Biodiversity Net Gain Assessment was undertaken by JBA Consulting in relation to the proposed installation of electric vehicle chargers at The Churchill Public House, in Royal Wootton Bassett, Wiltshire SN4 8ET.

A habitat survey and condition assessment was undertaken on the 26th March 2026 to quantify the baseline habitat units on site. The survey identified on-site habitats including modified grassland, a line of trees, and urban developed sealed surfaces. The proposed works are to install four electric vehicle chargers in the existing pub car park. There will be a small amount of grassland loss to facilitate the substation (approx. 16m²), with some temporary works to allow cabling for the chargers to be laid in Bramble *Rubus fruticosus* scrub. This scrub will be left to re-grow and will reach the same condition within two years so is not counted as a loss be reinstated within 2 years.

When entered into the Defra Statutory Biodiversity Metric the baseline area habitat units for the site were 0.22 units, and baseline hedgerow units were 0.69 units, with the post development habitats showing no measurable change in units, with 0.22 habitat units and 0.69 hedgerow units. Therefore, with the current proposals there will be no net loss of biodiversity units. Furthermore, the development is under the *de minimis* threshold of 25m² of habitat that will be permanently impacted (approx. 16m²). The temporary works to lay the cabling will re-instate the existing habitats to the same type and condition. There is also a line of trees which will be unaffected by the development. Therefore, the development is considered exempt from statutory BNG requirements.

Recommendations for next steps, including biosecurity measures during construction are included.

1 Introduction

1.1 Project background

JBA Consulting was commissioned by Raw Charging to undertake a Biodiversity Net Gain (BNG) assessment in relation to works at The Churchill, Wootton Bassett, Swindon, hereafter referred to as 'the site'.

The purpose of this assessment is to quantify the biodiversity value of the site prior to development, and the predicted value post-development. This is measured in biodiversity units calculated according to the habitats present based on their size, distinctiveness and condition using the Defra Statutory Biodiversity Metric (Defra, 2025). As the proposed development falls below the minimum area threshold for BNG, the Local Planning Authority require a report and metric evidencing that there will be no net loss in biodiversity due to the development.

The net gain considered in this report is separate from any biodiversity requirements resulting from protected species assessment and protected sites assessments.

1.2 Site location

The site is located in the car park of The Churchill Public House and along access from Swindon Road, Wootton Bassett, Swindon, SN4 8ET (Figure 1-1). The site is surrounded by arable fields to the north and residential areas and businesses of Royal Wootton Bassett to the south.

1.3 Proposed works

The proposed works are to install four electric vehicle (EV) chargers in the existing pub car park. There will be a small amount of grassland lost to facilitate the new substation (approx. 16m²), with some temporary works to allow cabling for the chargers to be laid. This will be reinstated immediately and is therefore counted as a temporary loss under BNG rules (temporary losses are those which are compensated for within 2 years).

Figure 1-1 shows both the redline boundary, for which the BNG assessment has been undertaken for, and the blueline boundary, which is the area inside the land ownership.

Full details are shown in the Wiltshire Planning Portal Reference Number: PL/2026/01105.

Any changes to the redline boundary or scope of works will likely need to be re-assessed.

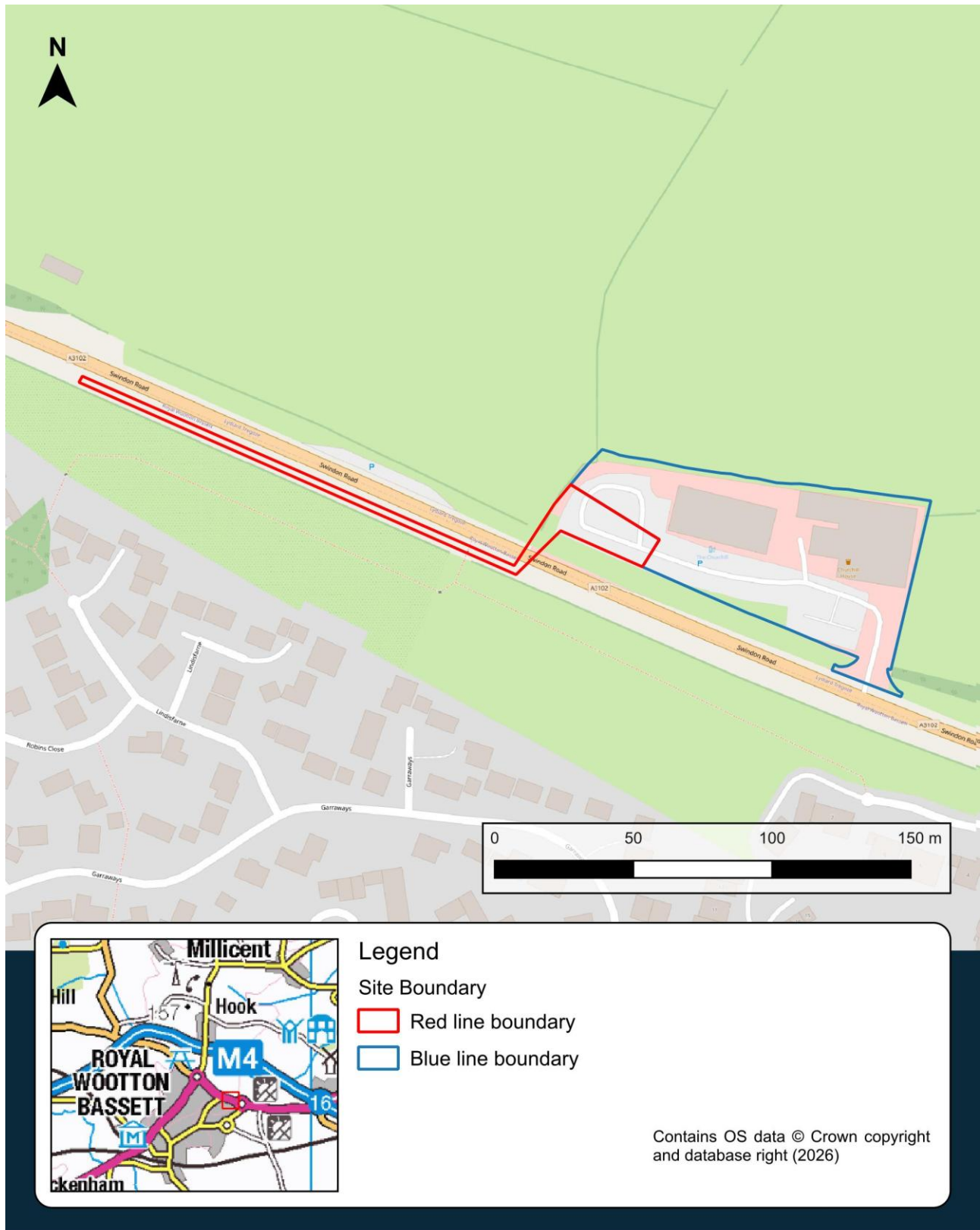


Figure 1-1: Site location.

1.4 Biodiversity Net Gain Background, Policy, and Legislation

Biodiversity Net Gain in development is defined as ‘development that leaves biodiversity in a better state than before’ (Baker et al., 2019). The Statutory Defra Biodiversity Metric uses habitat as a proxy for wider biodiversity, and as such habitat types are scored according to their relative biodiversity value. The value is adjusted according to the quality of the habitat (measured according to area, distinctiveness, condition and strategic significance) to give the ‘unit’ value for habitats, hedgerows and rivers. The biodiversity units predicted from habitat creation consider time to target condition and difficulty of creation as well these quality measures.

The National Planning Policy Framework (NPPF) states that planning policy should identify and pursue opportunities for securing measurable gains for biodiversity. The Natural Environment Planning Policy Guidance (PPG) (updated June 2021) provides further explanation on this by addressing a range of topics including biodiversity conservation, from individual site and species protection through to the supporting of ecosystem services, and the use of local ecological networks to support the national Nature Recovery Network. The PPG promotes the delivery of measurable BNG through the creation and enhancement of habitats alongside development.

The Environment Act 2021 was enacted in November 2021, and this mandated that BNG should be delivered at a minimum of 10% through the planning system. However, there has been a two-year transition period to allow for the making of necessary secondary legislation before the 10% BNG requirement became legally enforceable on 12th February 2024. However, prior to the 12th of February 2024 many Local Planning Authorities started to include BNG requirements into Local Plan policy.

However, mandatory BNG requirements do not apply to specific smaller or exempted developments, including those which do not impact a priority habitat and impact less than 25m² of on-site habitat and 5m of on-site linear habitats. The proposed works are therefore exempt from mandatory BNG requirements under this *de minimis* threshold.

The appraisal has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England.

- The Natural Environment and Rural Communities (NERC) Act 2006
- The UK Post-2010 Biodiversity Framework (2011-2020) (JNCC and Defra, 2012)
- Biodiversity 2020: A strategy for England’s wildlife and ecosystem services (Defra, 2011)
- UK Biodiversity Action Plan (UKBAP)
- The National Planning Policy Framework (NPPF) 2019 (DCLG, 2021)

2 Methods

2.1 Site survey

A site survey was undertaken on the 26th of March 2026 by experienced JBA ecologist Jen Jones MSc BSc ACIEEM and assistant ecologist Megan Cruise. The survey included the area within the red line boundary shown in Figure 1-1.

2.1.1 Habitats

Habitats were mapped to the highest resolution possible (Level 4 or 5) of the UK Habitat Classification scheme implemented using version 2.1 of the field key with reference to the relevant definitions (UKHab Ltd, 2023). Secondary codes were added where relevant to provide information on the management and environment relating to any particular habitat parcel. The classification was made using surveyor judgement by eye, with a species list collected for each of the main habitat parcels. Botanical nomenclature follows Stace (2019).

Condition of the habitats was assessed to identify their potential for contributing to the BNG score for the scheme using the Coreo app. These habitats were converted to the corresponding habitat used in the BNG Statutory Metric. Quadrats were completed for grassland habitats (see Section 3.1) using the Dafor scoring method (see Definitions).

2.1.2 Protected and Invasive non-native species

Although no dedicated search for protected and invasive non-native species (INNS) was conducted, any incidental sightings were recorded and mapped.

2.1.3 Mapping

The field data were mapped in Coreo and QGIS. In the field, the minimal mappable unit size was taken to be approximately 5m x 1m (i.e., 5m²), habitats smaller than this, including linear features such as tracks were recorded as a line, or incorporated into larger habitat parcels, with appropriate secondary codes added. The polygons were mapped to the Open Street Map layer, using MapBox aerial imagery as a guide within the Coreo app.

The GIS shapefile was used to calculate areas automatically based on the EPSG:27700 - OSGB36 / British National Grid which may slightly underestimate total areas where there is significant topographic variation.

The post-works habitats were then mapped in QGIS to give an estimate of their areas and used to calculate the approximate area of habitat that will be lost. The post works mapping was based upon the dwg and pdf files provided by the project team.

2.2 Statutory Biodiversity Metric calculation

The Statutory Biodiversity Metric has been used in this assessment for the proposed new charging stations and associated infrastructure.

2.2.1 Distinctiveness

The Statutory Biodiversity Metric automatically pre-populates the distinctiveness scores for each inputted habitat. Distinctiveness is based on the type of habitat and its distinguishing features including consideration of species richness, rarity (at local, regional, national and international scales), the extent to which it is protected by designations and the degree to which a habitat supports species rarely found in other habitats (Baker *et al.*, 2019).

2.2.2 Condition

The Statutory Biodiversity Metric uses habitat condition as one of the measures of habitat quality. Habitat condition was assigned following guidance from the 'Technical Supplement' document (Defra, 2025) which accompanies the Statutory Biodiversity Metric assessment criteria.

For the proposed created habitats, condition is based on the assumed management of the habitats to give an estimate of their condition post creation (i.e., continued to be managed in the same way). A precautionary approach was taken to ensure the value of habitats was not over estimated.

2.2.3 Area and length

The area or length of each baseline and post-works habitat is calculated from the digitised UKHab map as described in Section 2.1.3. Linear habitats are assessed separately, and area-based habitats are joined underneath linear features, such that the value used in the assessment is a slight over-estimate of their actual area.

2.2.4 Strategic significance

Strategic significance relates to the spatial location of a habitat parcel and works at a landscape scale. It gives additional biodiversity unit value to habitats that have been identified as habitats of strategic importance to that local area (Baker *et al.*, 2019).

The documents from Wiltshire Council (2025) used included the Adopted Wiltshire and Swindon Local Nature Recovery Strategy (LNRS) available at:

<https://www.wiltshire.gov.uk/local-nature-recovery-strategy> and [LNRS Guidance](#) (accessed 19th March 2026). Potentially relevant habitats listed in the LNRS (repeated below) would be classed as 'Formally identified in local strategy' in the post-works metric calculations. The baseline and proposed post-works habitats are not listed in the LNRS so are classed as 'Area / compensation not in local strategy', according to the Statutory BNG User Guide (Defra, 2025).

Key relevant details for the site from the LNRS include:

- Generally - control and remove invasive non-native species.
- Improve urban biodiversity and permeability of the built environment for wildlife - this is specifically marked as not a priority for the LNRS
 - Mow grass as infrequently and as late in the year as possible, aiming to create a varied structure. Maintain an appropriate cutting regime for the site and where possible remove cuttings.
- Maintaining and enhancing the environmental quality and wider benefits of Wiltshire's important linear green and blue access corridors.
 - Include elements like wildflower-rich margins, native woodland patches, and other elements that can be integrated into the corridors.
 - Enhance grassland by cutting (removing arisings) or grazing in open areas.
 - Increase grassland diversity by introducing selected species through plug planting, overseeding, or green hay spreading.

2.2.5 Trading Rules

Trading rules are a key part of the Statutory Biodiversity Metric and apply the principle that any loss of habitat is replaced on a 'like for like' or 'like for better' basis. The trading rules applied for individual habitats are based on their distinctiveness. Therefore, loss of habitats of very high distinctiveness (i.e. irreplaceable habitats) are not permitted, and a bespoke assessment and compensation will be required.

However, as this project is exempt from BNG, this report is a no net loss statement and trading rules are not relevant here.

2.3 Limitations

The habitats and species present in a given area are subject to change over time. A single field visit of this nature captures and reports the situation at the time of survey. As such, the advice contained within this report is considered valid for a period of 18 months before a review or an updated survey must be made by an ecologist (CIEEM, 2019).

The survey was conducted in March, outside the optimal vegetation condition assessment time (April - July), therefore, some species may have died down over winter and were not yet identifiable. The grassland verges are regularly managed by mowing. However, surveyors are confident in the habitat classification and condition despite the out-of-season survey and regular habitat management. Therefore, the results of the condition assessment should not be significantly impacted. This may also mean that any stands of INNS may not be visible due to the sub-optimal time of year.

Additionally, due to safety concerns, surveyors were limited to assessing only from the north side of the road due to fast traffic. However, the habitats requiring assessment were able to be identified sufficiently from this vantage point and it is not expected to impact the habitat classification or condition assessment.

The accuracy of habitat area measurements is limited by the form of baseline data collection and resolution of development proposal plans. In this instance, baseline habitat areas have been calculated within GIS, based upon the findings of the site visit cross-referenced with aerial imagery. Post-development habitat areas have been calculated from pdf and dwg files provided.

Any changes to the proposed scope or works areas will require review and updates to this BNG assessment.

3 Results and Evaluation

3.1 Habitat survey

The site was largely comprised of urban hardstanding habitats, with small areas of modified grassland verges, and a line of trees. Habitats present within the area of the proposed works are described below. The habitats are mapped in Figure 3-4 and details on their condition in the area subject to BNG are given in Table 3-2 and Table 3-3. Condition sheets for the habitats surveyed are shown in Appendix B.

3.1.1.1 Modified grassland - g4

There was one parcel of modified grassland on site (parcel G1), in moderate condition (see Appendix B for condition assessment results). This is a road verge habitat (secondary code 801) with a regular mowing regime (secondary code 516), which has resulted in compacted soil and short sward. There were some patches with a higher proportion of moss cover, but the general composition was dominated by Red Fescue *Festuca rubra*, Yorkshire-fog *Holcus lanatus*, Smooth Meadow-grass *Poa pratensis*, and Daisy *Bellis perennis*, with occasional Spear Thistle *Cirsium vulgare*, Prickly Sowthistle *Sonchus asper*, Bristly Oxtongue *Helminthotheca echioides*, Common Hogweed *Heracleum sphondylium*, and Creeping Buttercup *Ranunculus repens* present in the quadrat (Table 3-1, Figure 3-1, and Figure 3-2). There were also Sorrel *Rumex* species present in the wider habitat parcel.



Figure 3-1: Modified grassland quadrat.



Figure 3-2: Modified grassland parcel G1.

Table 3-1: Modified grassland quadrat details (Dafor: A = abundant, F = frequent, O = occasional, R = rare). Negative indicator species shown in bold text.

Dafor	Species
A	Red Fescue <i>Festuca rubra</i>
A	Moss species
O	Creeping Buttercup <i>Ranunculus repens</i>
O	Daisy <i>Bellis perennis</i>
R	Smooth Meadow-grass <i>Poa pratensis</i>
R	Yorkshire-fog <i>Holcus lanatus</i>
R	White Clover <i>Trifolium repens</i>
R	Mouse Ear Chickweed <i>Cerastium glomeratum</i>
R	Common Ragwort <i>Jacobaea vulgaris</i>
R	Dandelions <i>Taraxacum</i> spp.
R	Hairy Bittercress <i>Cardamine hirsuta</i>
R	Speedwell <i>Veronica</i> species
R	Lesser Trefoil <i>Trifolium dubium</i>

3.1.1.2 Line of trees - w1g 033

There was one line of trees secondary code 033) in moderate condition. This was dominated by Hawthorn *Crataegus monogyna*, with occasional Blackthorn *Prunus spinosa* (Figure 3-3). The line of trees originates in the modified grassland verge to the south of the site, with Bramble *Rubus fruticosus* scrub (h3d) understorey, and has a modified grassland field to the south of it acting as a natural buffer strip. Due to the species mix, this habitat may be a mature hedgerow that has developed into a line of trees; as such it has been assessed in its current form as a line of trees. According to the UKHab guidance, a line of trees is >2m canopy height, <5m at base, and has open habitat on either side (UKHab Ltd, 2023).



Figure 3-3: Native line of trees H1 (w1g 033) with Bramble scrub understorey (h3d) S1.

3.1.1.3 Bramble scrub h3d

There was one parcel of Bramble scrub (h3d) with the line of trees (H1) growing above the scrub (Figure 3-3).

3.1.1.4 Urban - u1, u1b5, u1b6, u1c

Hardstanding habitats within the site include a car park (804), road (800), and a fence (612).

3.1.2 Invasive non-native species

No INNS were observed during the site visit. Outside of the redline boundary there were some areas of introduced shrubs, but these are not considered relevant.

3.2 BNG assessment

3.2.1 Baseline habitats

Full details on the baseline habitats are provided in Section 3.1 above. The tables below display the baseline habitats and their associated condition and units. Full details on Condition Assessment are shown in Appendix B and quadrat data for the grassland is shown in Table 3-1.

All area-based and linear habitats are classed as the following strategic significance category: 'Area / compensation not in local strategy / no local strategy'.

Table 3-2: Baseline habitat units on site.

Ref.	BNG Habitat	Condition	Area (Ha)	Units
G1	Modified grassland	Moderate	0.010	0.04
S1	Bramble scrub	N/A	0.045	0.18
U1	Developed land; sealed surface		0.050	0.00
U2	Developed land; sealed surface		0.004	0.00
Totals			0.11	0.22

Table 3-3: Baseline hedgerow units on site.

Ref.	BNG Habitat	Condition	Length (km)	Units
H1	Line of trees	Moderate	0.173	0.69

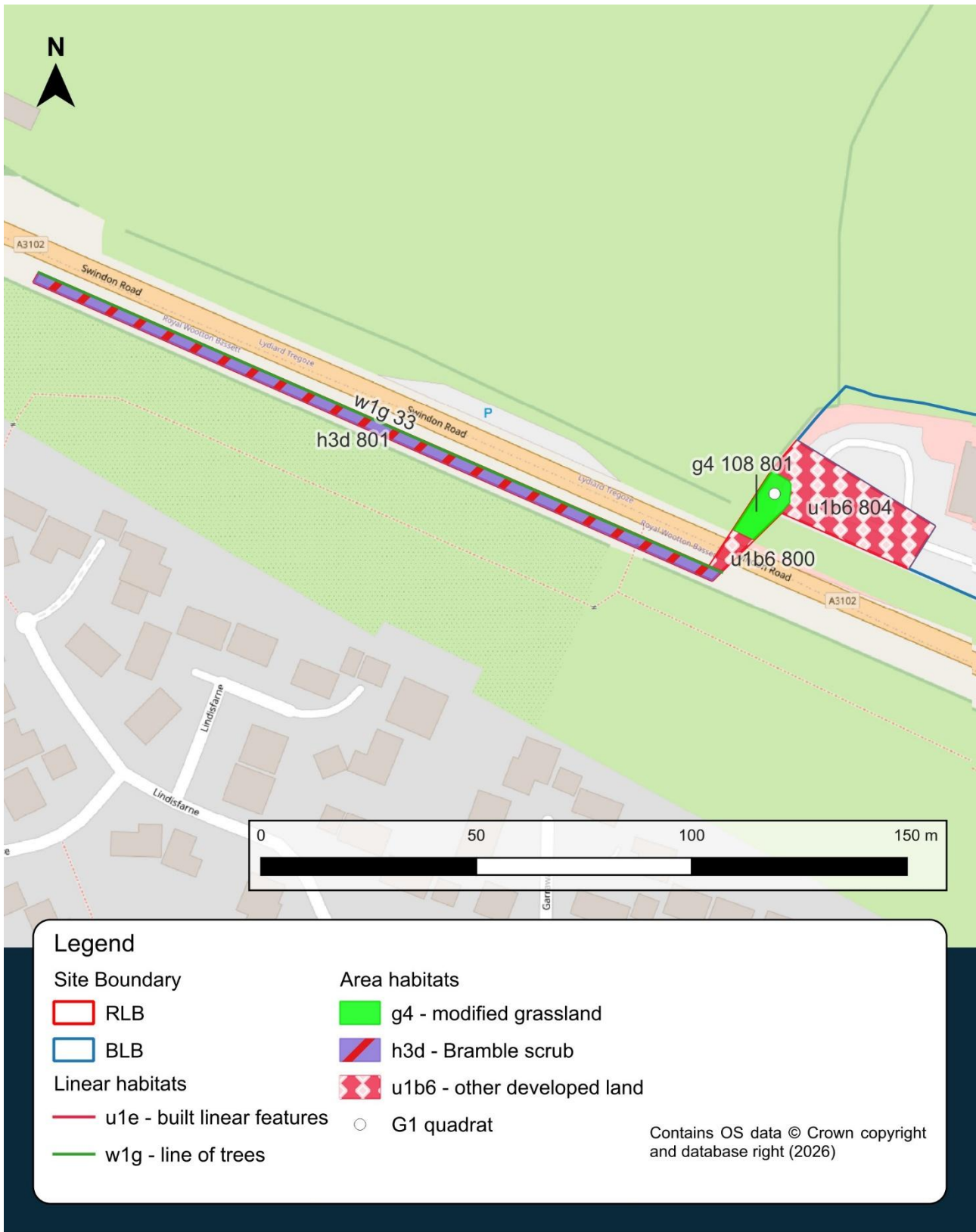


Figure 3-4: Baseline habitats.

3.2.2 Proposed post-works habitats

The post-works habitats are assumed to be continued to be managed in the same way and so retain the same condition categories as the baseline. A general and detailed arrangement can be seen in Appendix C; the main significant changes that will occur are:

- Minor loss of grassland (Table 3-4) to facilitate the substation for the new EV chargers (Table 3-5).
- Temporary loss of scrub to allow cabling to be laid; this will be left to re-grow and will reach the same condition within two years so is not counted as a loss.

3.2.2.1 Area-habitat units

The areas of habitat that will be lost as part of the scheme are given in Table 3-4 below. No other habitat losses are expected as part of the development.

There will be some temporary works to allow cabling for the chargers to be laid. This scrub will be reinstated within 2 years and therefore counted as temporary loss.

Table 3-4: Habitat losses.

Ref.	BNG Habitat	Existing area (ha)	Area lost (ha)	Habitat Unit Value lost
G1	Modified grassland	0.010	0.001	0.00

Table 3-5: Habitat creation.

Ref.	BNG Habitat	Condition	Area (ha)	Created units
G1_1	Developed land; sealed surface	N/A	0.001	0.00

3.2.2.2 Hedgerow units

There will be no changes (loss or creation) to the line of trees, and therefore this results in no net loss of hedgerow habitat units.

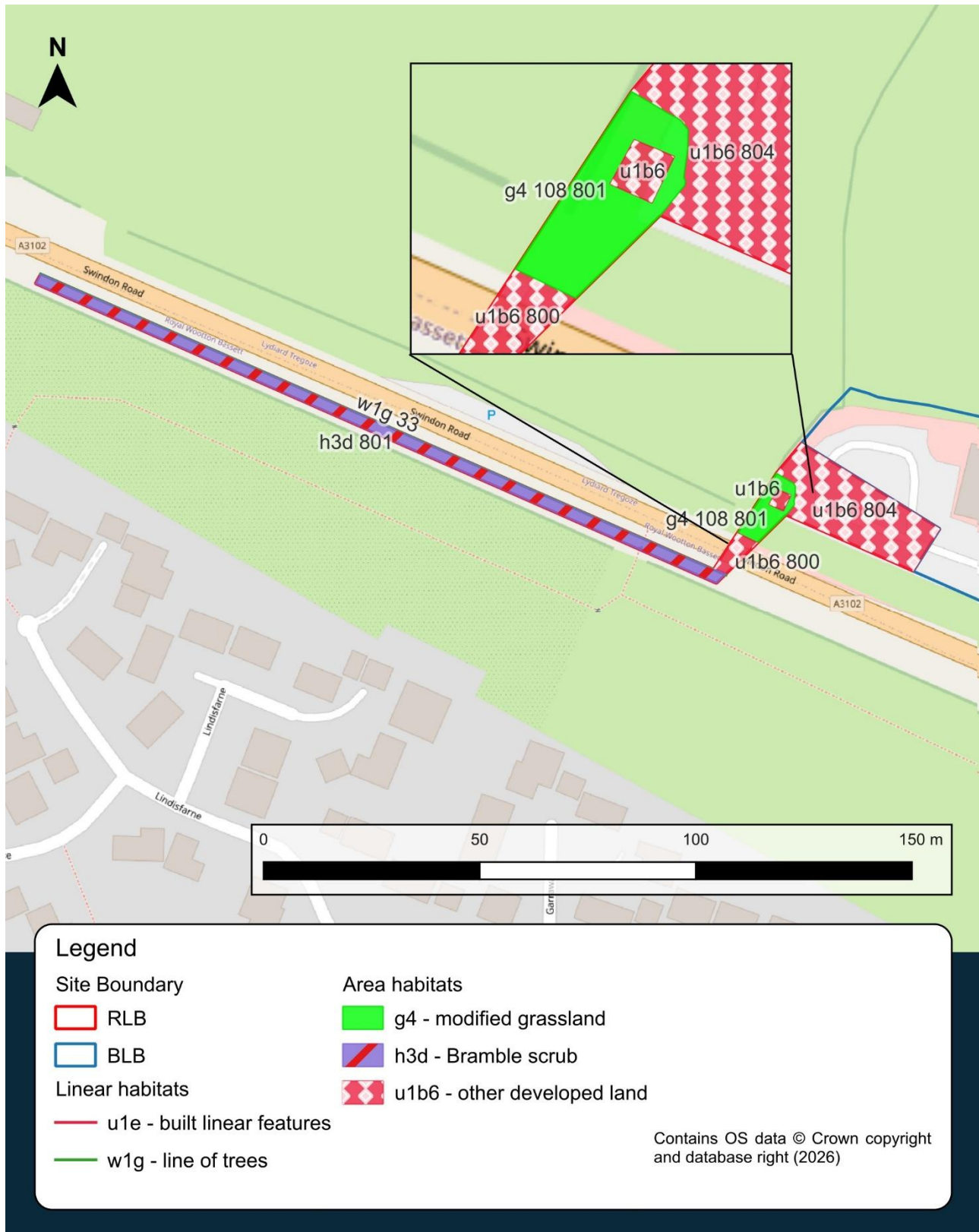


Figure 3-5: Post-works habitats.

4 Conclusions and Recommendations

4.1 Overall change in biodiversity units

A full copy of the Statutory Biodiversity Metric calculation spreadsheet is supplied as a separate document, provided in Excel format. In summary, the key findings of the BNG assessment are shown in Table 4-1.

Trading rules are not satisfied due to the loss of a small area of modified grassland, however, with the current landscape proposals there will be no net loss of habitat area units and hedgerow units, with 0.00 change in units between the baseline and post-intervention units.

4.2 BNG exemption statement

The proposed works are deemed to be exempt from requiring statutory BNG according to [The Biodiversity Gain Requirements \(Exemptions\) Regulations 2024](#). This is under the 'Developments below the Threshold' exemption due to there being a *de minimis* impact on onsite habitat (www.legislation.gov.uk).

The works proposed on site at the Royal Horse are to facilitate the installation of new EV chargers and associated infrastructure.

The proposed works meet both conditions to ensure that this work would be exempt from BNG:

- The development does not impact an on-site priority habitat.
- The development impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero; and less than 5 metres in length of onsite linear habitat (full plan in Appendix C).

The habitats present on site include modified grassland, line of trees, and developed land sealed surface (Figure 4-2). None of these are priority habitats as listed under Section 41 of the NERC Act 2006 (www.gov.uk).

Only nature-rich road verges, which are not present at this site, are included in the LNRS and therefore there will be no loss of local priority habitats. The only habitats that are proposed to be impacted are the modified grassland verges of moderate condition, with negligible value for wildlife (Appendix C). The total area of grassland habitat affected is 16m² (i.e., <25m²) which has negligible biodiversity unit value. The temporary works to lay the cabling will re-instate the existing habitats to the same condition. There is also a line of trees which will be unaffected by the development. Therefore, the development is exempt from statutory BNG requirements and considered to achieve no net loss.

Table 4-1: Headline results from the Statutory Biodiversity Metric, showing no net loss.

Habitat type	On site net change	
	Units	Percentage
Area habitat units	0.00	-1.82%
Hedgerow units	0.00	0.00%
Watercourse units	0.00	0.00%

4.3 Recommendations

The following recommendations are made in order to avoid and/or mitigate against the potential ecological impacts of the proposed works.

4.3.1 Invasive species

Measures will need to be put in place to ensure that there is no spread of invasive non-native species or diseases from outside the site onto the site. Care must be taken if/while working around the introduced shrub areas.

The Check-Clean-Dry approach should be followed, ensuring that all Personal Protective Equipment and equipment is cleaned before leaving site. For more information go to: www.nonnativespecies.org/checkcleandry.

4.3.2 Biodiversity Net Gain

As outlined above (Section 4.2), the current designs of the site fall below the minimum threshold for BNG and the development is exempt from requiring 10% net gain to be on site.

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Wiltshire Council (2025). *Wiltshire and Swindon Adopted Local Nature Recovery Strategy (LNRS)*. [Online] Available at: <https://www.wiltshire.gov.uk/local-nature-recovery-strategy> [Accessed 19/03/2026].

A Relevant policy and legislation

The legislation discussed below is intended as a guide only and does not replace formal legal advice.

A.1 National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied with a presumption in favour of sustainable development a core element of the framework.

Of relevance to the proposed works in this report, the document states in relation to conserving and enhancing the natural environment, that: "If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused" Ministry of Housing, Communities and Local Government (2024).

It also states that: "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" Ministry of Housing, Communities and Local Government (2024).

Additionally, it states: "promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species" and "minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures" Ministry of Housing, Communities and Local Government (2024).

A.2 Natural Environment and Rural Communities (NERC) Act 2006

Section 40 of the Natural Environment and Rural Communities Act (2006) states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.

Section 41 of the NERC Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. To meet this requirement, the England Biodiversity List (the S41 list) has been developed. Species and habitats listed under Section 41 of the NERC Act 2006, whilst not necessarily being legally protected, can be a material planning consideration.

The S41 list, which replaces the list published under Section 74 of the Countryside and Rights of Way (CROW) Act 2000, should be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the NERC Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

A.3 Biodiversity and Geological Conservation, England

Statutory Obligations and Their Impact Within the Planning System in England, (GOV.UK, 2005)

A.4 National Planning Practice Guidance Natural Environment, England

Paragraph 10-35, (GOV.UK, 2019)

A.5 Statutory designated nature conservation sites

Sites with statutory designations receive varying degrees of legal protection under UK statute and European Directives. There are several statutory designations used for sites of high nature conservation value in the UK, which are applied depending upon the importance of the site in a local, regional, national or international context. This includes:

- Ramsar Sites (International designation);
- SAC and SPA (European designations);
- National Nature Reserves (NNR) and SSSI (National designations);
- Local Nature Reserves (LNR) (Local designation).

A.6 Non-statutory designated sites

Non-statutory sites are afforded no statutory legal protection, but are normally recognised by local planning authorities and statutory agencies as being of local nature conservation value. The protection afforded to such sites is usually discretionary, through Local Plan policies. Non-statutory sites are designated by the local authority, usually in partnership with the County Wildlife Trust (or equivalent).

A.7 Invasive non-native species

Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) lists plant species, groups of plants and animal species for which it is illegal to plant, release, allow to escape or cause to spread into the wild. Examples of species listed on Schedule 9, which are most likely to be encountered, include Cotoneaster and non-native Honeysuckle.

Some species are also classed as 'controlled waste' under the Environmental Protection Act 1990 and must be disposed of properly. These provisions mean that, if these species occur on a site proposed for development or other work which may disturb the ground, control of these species is likely to be required.

B Habitat Condition Assessment

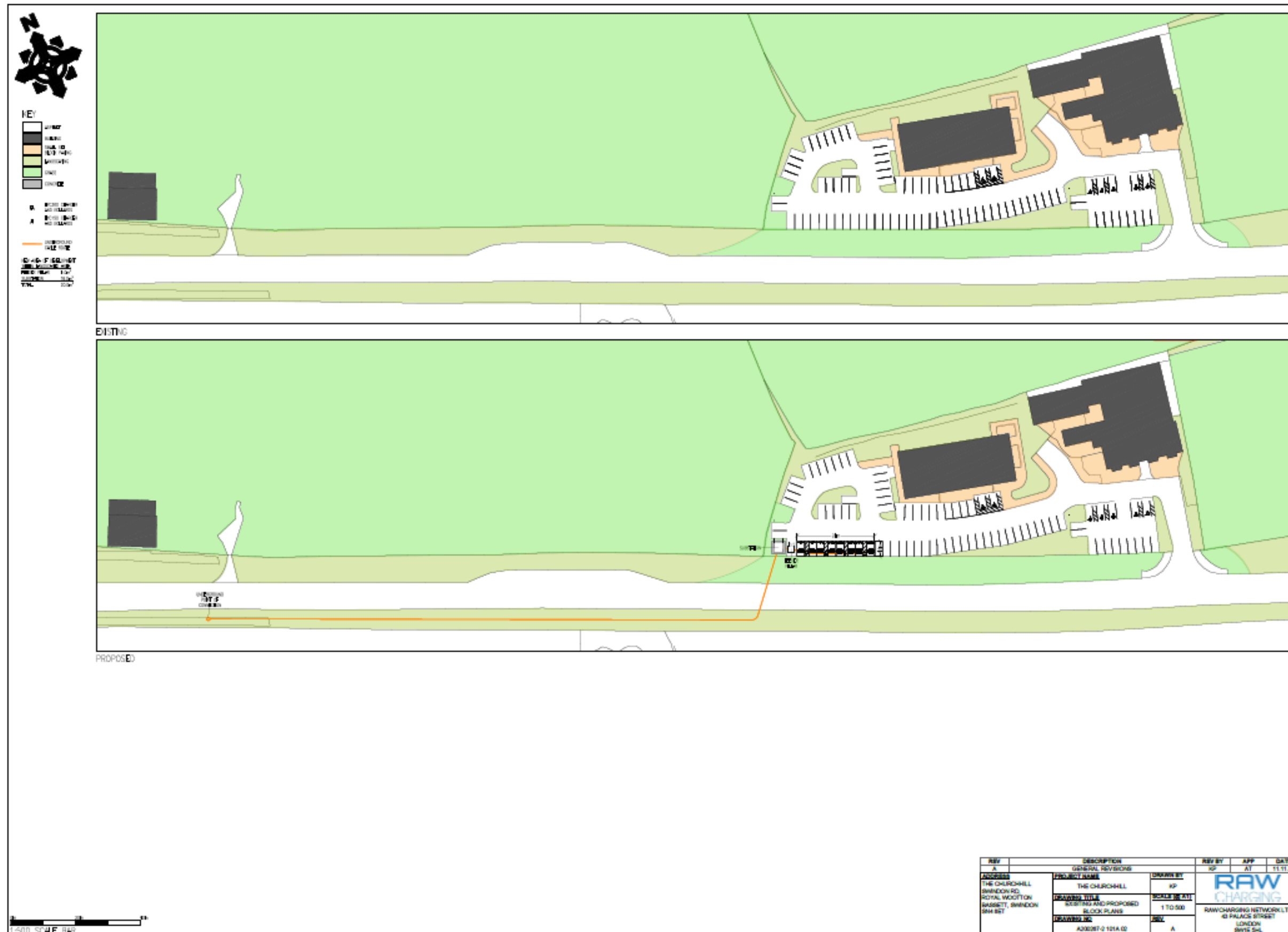
Table B-1: Modified Grassland g4 (parcel G1) Condition Assessment.

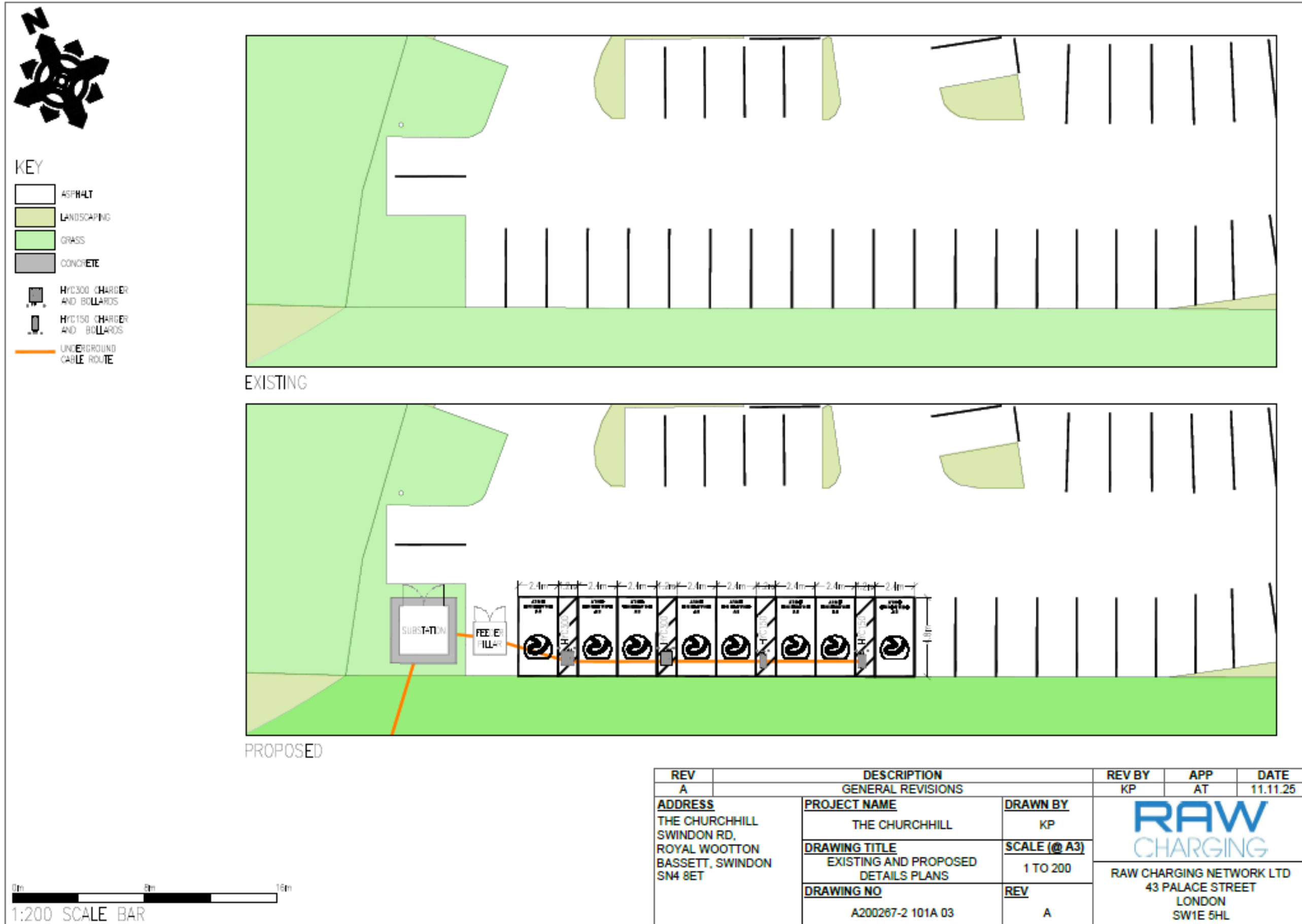
Criterion		Pass?	Notes
A	There are 6-8 vascular plant species per m2 present, including at least 2 forbs. This criterion is essential for achieving Moderate or Good.	Yes	See details in Section 3.1.1.1
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm).	No	All short mown
C	Any scrub present accounts for less than 20% of the total grassland area.	Yes	No scrub present
D	Physical damage is evident in less than 5% of total grassland area.	No	Compacted and excessive mowing
E	Cover of bare ground is between 1% and 10%, including localised areas.	No	All parcels <1% bare - areas which would be bare are covered by dense moss
F	Cover of Bracken is less than 20%.	Yes	None present
G	There is an absence of invasive non-native plant species (Schedule 9 of WCA).	Yes	No INNS present
Essential criterion achieved		Yes	Moderate condition

Table B-2: Line of trees w1g 033 (parcel H1) Condition Assessment.

Criterion		Pass?	Notes
A	At least 70% of trees are native species.	Yes	See Section 3.1.1.2
B	Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.	Yes	Continuous line
C	One or more with veteran features and or natural ecological niches for vertebrates and invertebrates.	No	None present
D	There is an undisturbed naturally-vegetated strip of at least 6 m on both sides.	No	See Section 3.1.1.2
E	At least 95% of the trees are in a healthy condition and little evidence of adverse impact on tree health by damage.	Yes	No obvious dead trees - see limitations (Section 2.3)
Condition result		Moderate	

C Proposed works plans (source: Raw Charging, March 2026)





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