



Contents

1. INTRODUCTION.....	4
1.1 OVERVIEW.....	ERROR! BOOKMARK NOT DEFINED.
2. LEGISLATION AND POLICIES.....	5
3. METHODOLOGY.....	6
4. BASELINE HABITAT DISTINCTIVENESS, CONDITION AND STRATEGIC SIGNIFICANCE	9
5. HABITAT LOSS AND RETENTION	11
6. DELIVERY STRATEGY.....	12

1. INTRODUCTION

- 1.1.1 Waterman Infrastructure & Environment Ltd (Waterman IE) has been instructed by Network Rail (via Atkins) to undertake a baseline Biodiversity Net Gain (BNG) Baseline Assessment of a land parcel known as the former Bradleys Nursery, Huddersfield, Kirklees; central Ordnance Survey national grid reference (OSNGR) SE 17152 20090).
- 1.1.2 **Figure 1** identifies the 1.17ha red line Planning Application Boundary (i.e. the 'Site'). The wider land ownership boundary which was subject to survey is shown for context in blue.
- 1.1.3 This Biodiversity Net Gain (BNG) baseline assessment is to accompany the Ecological Impact Assessment (EclA) as part of a planning application for a new construction compound and associated facilities within the Site. For this BNG baseline assessment, consideration has been given to the Site only.
- 1.1.4 The purpose for this report is to:
- Identify the baseline units of the Site;
 - Provide a completed Statutory Metric for the Site showing the baseline habitat units and unit losses associated with the vegetation clearance to enable the proposed works, and
 - Explain how the Statutory Metric has been used to calculate BNG; and
 - Present the strategy to offset the BNG habitat loss at the site.

2. Legislation and Policies

- 2.1.1 The following planning policies are considered relevant to this assessment, full details of which are provided in Appendix A:
- The Environment Act, 2021¹ ;
 - National Planning Policy: National Planning Policy Framework, 2021² ;
 - Local Planning Policy.
- 2.1.2 Since the implementation of secondary regulations on 12th February 2024 associate with the Environment Act 2021, it is mandatory requirement for most developments in England to achieve a minimum of 10% net gain for biodiversity. This can be delivered on or off-site (where onsite deliver is not possible). The planning application for this Site meets the requirements for mandatory 10% BNG.
- 2.1.3 It is intended that this report is used to identify the requirements for a suitable offsite location for the delivery of 10% BNG in consultation with Kirklees Council, as required by The Environment Act 2021.

¹ HMSO (2021): The Environment Act. Schedule 7A

² Department of Communities and Local Government. (2021): National Planning Policy Framework.

3. Methodology

- 3.1.1 This assessment has been produced in accordance with the BNG Good Practice Principles³ and follows the methodology set out in the following guidance documents which form part of the legal requirements for BNG:
- The Statutory Biodiversity Metric – User Guide⁴; and
 - The Statutory Biodiversity Metric - Condition Assessment Sheets and Methodology⁵.
- 3.1.2 The methodology set out in Table 1 below defines a simplified version of the method used to carry out the BNG assessment. For full details including rules and methodology refer to the guidance documents referenced above.
- 3.1.3 A Field Survey was undertaken on 20th May 2024 by Zinnia Pennington (Ecologist Qualified CIEEM, FISC 3⁶) and Erin Nolan (Ecology Apprentice). The survey was completed in accordance with methodology outlined in the UK Habitat (UKHab) Classification User Manual⁷, with the type and extent of each habitat present within the Site recorded. Survey conditions were optimum and was conducted during an appropriate time of year (April to September) when flowering plants are most visible. More detail on the survey methodology is presented in the EclA Report. The condition, strategic significance of each habitat and the associated distinctiveness of these habitats, are discussed in greater detail below.
- 3.1.4 There was no line of trees, rivers, or ditches present on Site and no calculations in relation to these features are required.
- 3.1.5 It should be noted that vegetation clearance works took place between the 22nd of October to the 1st of November 2024, however the baseline presented on this report is as recorded in May 2024.
- 3.1.6 Table 1 below sets out the methodology for calculating the baseline values.

Table 1: Methodology for assessing factors within the Metric.

Factor	Baseline
Habitat type	Habitat types were recorded and mapped using UKHab (Figure 2)
Area	<p>Habitats were separated into parcels: geographically discrete or a change in habitat condition across a single location. Each parcel was recorded and calculated separately within the Metric.</p> <ul style="list-style-type: none"> • Areas were calculated in hectares to two decimal places using digital mapping in ArcGIS⁸. • Area habitats are measured in hectares.
Distinctiveness	<ul style="list-style-type: none"> • Distinctiveness value is automatically generated by the Metric based on habitat type. The overall distinctiveness categories used for habitat areas is shown within the User Guide, habitats will be defined as Very Low, Low, Medium, High or Very High.

³ CIEEM (2019) Biodiversity Net Gain. Good practice principles for development. London, UK

⁴ Natural England (2024) The Statutory Biodiversity Metric: User Guide. Natural England.

⁵ Natural England (2024) The Statutory Biodiversity Metric - Condition Assessment Sheets and Methodology.

⁶ Field Identification Skills Certificate – Botanical Society of Britain and Ireland.

⁷ UKHAB Ltd (2023). Version 2.0(at ukhab – UK Habitat Classification).

⁸ ESRI. ArcGIS online <https://www.arcgis.com/index.html>

Factor	Baseline
Condition	<p>Habitat condition is a score based on the quality of the habitat, judged against the perceived ecological optimum state for that particular habitat. It is, therefore, a means of measuring variation in the quality of patches of the same habitat type rather than a measure of quality between habitat types.</p> <p>The 'condition assessment'⁹ involves assessing each habitat type / parcel against criteria in the associated condition sheet, resulting in a condition score (Good, Moderate or Poor) which is then input into the Metric.</p> <ul style="list-style-type: none"> • Some intensively managed habitats have a pre-defined condition score; and for other very low distinctiveness habitats no assessment is required. • A condition assessment was carried out during the field survey. • A pragmatic approach to habitat establishment was adopted as per guidelines.
Strategic Significance	<ul style="list-style-type: none"> • Strategic significance utilises relevant published documents to identify local priorities for targeting biodiversity and nature improvement. It works at a landscape scale and gives additional unit value to habitats that are in preferred locations for biodiversity and other environmental objectives. • A Local Nature Recovery Strategy (LNRS) is collaboratively being prepared for West Yorkshire; however, this has not yet published. In accordance with the guidance set out within the User Guide, the following strategic documents have been utilised to determine the strategic significance of the habitats identified on Site: <p>Local Planning Authority Local Ecological Networks</p> <ul style="list-style-type: none"> • Biodiversity Action Plans • Species conservation and protected sites strategies • Green Infrastructure Strategies <p>Strategic significance has been defined as below:</p> <ul style="list-style-type: none"> • High strategic significance has been assigned to habitats described as locally ecologically important within a specific location, within the strategic documents specified above. • Medium strategic significance has been assigned to habitats which are ecologically important within a specific location but have not been included within the strategic documents specified above. • Low strategic significance has been assigned to habitats which are not considered ecologically important, are not described within nor deliver the specific actions outlined within the strategic documents specified above.

- 3.1.7 All habitat interventions must take into consideration the trading rules as defined in the Statutory Metric User Guide. The type of trading depends on the distinctiveness and condition of the habitat. As such it is prohibited to enhance a habitat across 'broad habitat groups' if the distinctiveness or condition is not also enhanced.

⁹ Defra. Statutory Biodiversity Metric. Habitat Condition Assessment Sheets and Instructions

- 3.1.8 There were no 'irreplaceable habitats' present on Site. For reference however, these habitats cannot be accounted for in the Metric and require separate consideration¹⁰.

Limitations and Assumptions

- 3.1.9 Baseline habitats have been mapped using a 'Minimum Mappable Unit' area of 25m² applied in line with UKHab methodology. As such some small areas of habitats have been excluded from the BNG assessment. This will not significantly affect the metric calculations undertaken as part of this assessment.
- 3.1.10 It is assumed all vegetation which has been cleared is to become sealed surface post-development due to the nature of the proposals as a compound.
- 3.1.11 For reference, proposed habitats which are deemed to be significant interventions need to be subject to a management regime of a minimum of 30 years; as per best practice guidance and in line with s100(2)(b) of the Environment Act 2021.
- 3.1.12 It is important to note that this report does not define the full detailed methodology for BNG assessment, and the guidance documents should be referred to where relevant and if necessary.

¹⁰ National Planning Policy Framework (2023) Glossary provides a definition and examples of irreplaceable habitats

4. Baseline Habitat Distinctiveness, Condition and Strategic Significance

- 4.1.1 The BNG metric results should be read in conjunction with the Metric calculator¹¹ and the condition assessment proforma (**Appendix B**).
- 4.1.2 The habitat types recorded on Site are described below should be read in association with **Figure 2**. For a summary of the habitats identified on Site, their area, assessed condition and their generated baseline habitats units, please see **Table 2**. A full description, species list and photographs can be found in the EclA Report.

Mixed scrub h3h

- 4.1.3 Two areas of mixed scrub were located within the Site. Both mixed scrub habitats have been allocated moderate condition on the basis that only three out of the five condition criteria were passed. See Table 2 for the condition criteria. Low strategic significance has been allocated to this habitat.

Bramble Scrub

- 4.1.4 Five areas of very dense bramble scrub were located within the Site. It is not possible to allocate a condition assessment to this feature, this is assigned automatically by the Metric. Low strategic significance has been allocated to this habitat.

Modified grassland g4

- 4.1.5 Four areas of modified grassland were located within the Site. All these habitats have been allocated moderate condition on the basis of achieving four or five out of seven criteria. Low strategic significance has been allocated to this habitat.

Ruderal/ Ephemeral (Secondary code 81)

- 4.1.6 Sparsely vegetated land was the most dominant habitat present on site, with five areas. Three of these areas were allocated good condition and two were allocated moderate condition. Low strategic significance has been allocated to this habitat.

Other woodland, broadleaved w1g

- 4.1.7 Two areas of other woodland, broadleaved are present on-Site. These two woodlands were given poor conditions achieving 25 and 19 points out of 39. Low strategic significance has been allocated to this habitat.

Developed land-sealed surface u1b

- 4.1.8 A large area of the Site was comprised of hardstanding. It is not possible to allocate a condition assessment to this feature, this is allocated automatically in the Metric. Low strategic significance has been allocated to this feature.

¹¹ WIE15642-231-1-1-1-Bradleys BNG Metric

Table 2: Summary of habitat baseline

UKHab Classification	Condition Assessment Score	Condition Score	Area (ha)	Habitat Units*
Mixed scrub	3 out of 5	Moderate	0.080	0.74
Bramble scrub	N/A	N/A	0.164	0.72
Modified grassland	5 out of 7	Moderate	0.121	0.48
Ruderal/Ephemeral	3 out of 3	Good	0.506	3.04
Ruderal/Ephemeral	2 out of 3	Moderate	0.148	0.59
Other, broadleaved woodland	25 and 19 points out of 39	Poor	0.048	0.21
Developed land; sealed surface	NA	NA - Other	0.121	0.00
Built linear features	NA	NA - Other	0.008	0.00
Total habitat area	-	-	1.197	5.78

*Metric rounds to two decimal places

5. Habitat Loss and Retention

Table 3: Summary of Habitat units post-development

Habitat	Area retained	Area Lost	Condition	Habitat units retained	Habitat Units lost
Mixed scrub	0.045	0.035	Moderate	0.41	0.32
Bramble scrub	0.054	0.110	N/A	0.24	0.48
Modified grassland	0.061	0.060	Moderate	0.24	0.24
Ruderal/Ephemeral	0.024	0.482	Good	0.14	2.89
Ruderal/Ephemeral	0.00	0.148	Moderate	0.00	0.59
Other, broadleaved woodland	0.035	0.013	Poor	0.15	0.06
Developed land; sealed surface	0.121	0.00	NA - Other	0.00	0.00
Built linear features	0.008	0.00	NA - Other	0.00	0.00
Total habitat area	-	-	-	1.18	4.58

- 5.1.1 Completed vegetation removal is indicated in Figure 3 alongside the post development habitats. As no plans are currently in place to create or enhance habitats on site the proposals predict a loss of 4.59 habitat units (please note due to the rounding of decimals to 2 places, the above table indicates 4.58 units however the correct output as per the metric is 4.59 (see Appendix D).

Summary

- 5.1.2 The baseline biodiversity unit values (and subsequent predicted losses) present within the Site, as detailed in Appendix D (Table A1 – A3) comprise **5.78 habitat units**.
- 5.1.3 In order to achieve a 10% net gain for biodiversity a total of 6.36 habitat units (i.e. total of post-intervention biodiversity units) should be provided.

6. Delivery Strategy

- 6.1.1 The proposed development is a temporary construction compound to serve the wider TRU programme. Following completion of the works the site will be returned to Kirklees Council as landowner.
- 6.1.2 BNG offsetting can be achieved on site and a detailed landscape plan could be developed to deliver on this requirement. However the applicant recognises that the site is allocated as employment land and it is assumed that future development will be brought forward post December 2027.
- 6.1.3 The application does not intend that the delivery of BNG offsetting should prejudice future development at the site and therefore the applicant will explore, in collaboration with Kirklees council and is proposed to be delivered through the following hierarchy of options:
- Within the TWAO Network Rail boundary (i.e. is delivered as part of the wider TRU BNG commitment) monitoring and maintenance will be through NR;
 - Existing projects with no monitoring required (the contribution is the work itself);
 - New areas within an existing project with periodic habitat monitoring recommended or arrangements for an appropriate commuted sum; and
 - New land with periodic monitoring recommended or arrangements for an appropriate commuted sum.
- 6.1.4 The above section also provides outline details on responsibilities for maintenance and monitoring of any offset land.

Figures

Appendices

Appendix A. Legislation and Policy

Environment Act 2021

The Environment Bill was given Royal Assent in November 2021 and is now the Environment Act 2021. The Act includes a target to halt the decline of nature by 2030 and to strengthen the existing biodiversity duty through the introduction of a mandatory requirement to achieve at least 10% biodiversity net gain (BNG) for new developments in England. These requirements commenced on 12th February 2024. The BNG requirement is framed as a pre-commencement condition and that BNG information will need to be provided by the applicant as part of the planning application submission.

The act is supported by secondary legislation comprising six statutory instruments:

- The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024;
- The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2024;
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024;
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024;
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024; and,
- The Biodiversity Gain Site Register Regulations 2024.

National Planning Policy

National Planning Policy Framework, 2023

The National Planning Policy Framework (NPPF) was published in 2012 and last updated December 2023¹². Section 15 (outlined below) of the NPPF, 'Conserving and Enhancing the Natural Environment', is of relevance to this report. No significant changes to Section 15 are noted between the 2021¹³ and 2023 update. The Government Circular 06/2005¹⁴ - Biodiversity and Geological Conservation: Statutory Obligations and Their Impact within the Planning System, remains valid and is still referenced within the NPPF.

Of particular significance with respect to biodiversity in the NPPF revision, is the amendment to para 175(d) of the NPPF 2019 (now para 180(d) of the NPPF 2021), which now requires opportunities to incorporate biodiversity improvements in and around Proposed Development, rather than simply making it optional. This demonstrates further steps taken by the government towards achieving the 25 Year Environment Plan (2018). Otherwise, there have been no further changes to the wording of "Conserving and enhancing the natural environment" Chapter of the NPPF.

¹² Department for Levelling Up, Housing and Communities (2023): National Planning Policy Framework

¹³ Ministry of Housing, Communities and Local Government (2021): National Planning Policy Framework

¹⁴ Department of Communities and Local Government (2005): Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.

The NPPF encourages the planning system to contribute to and enhance the natural and local environment. This should be achieved by:

- “Protecting and enhancing valued landscapes, Sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.

The NPPF also stipulates that Local Planning Authorities (LPAs), when determining planning applications, should apply the following principles:

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

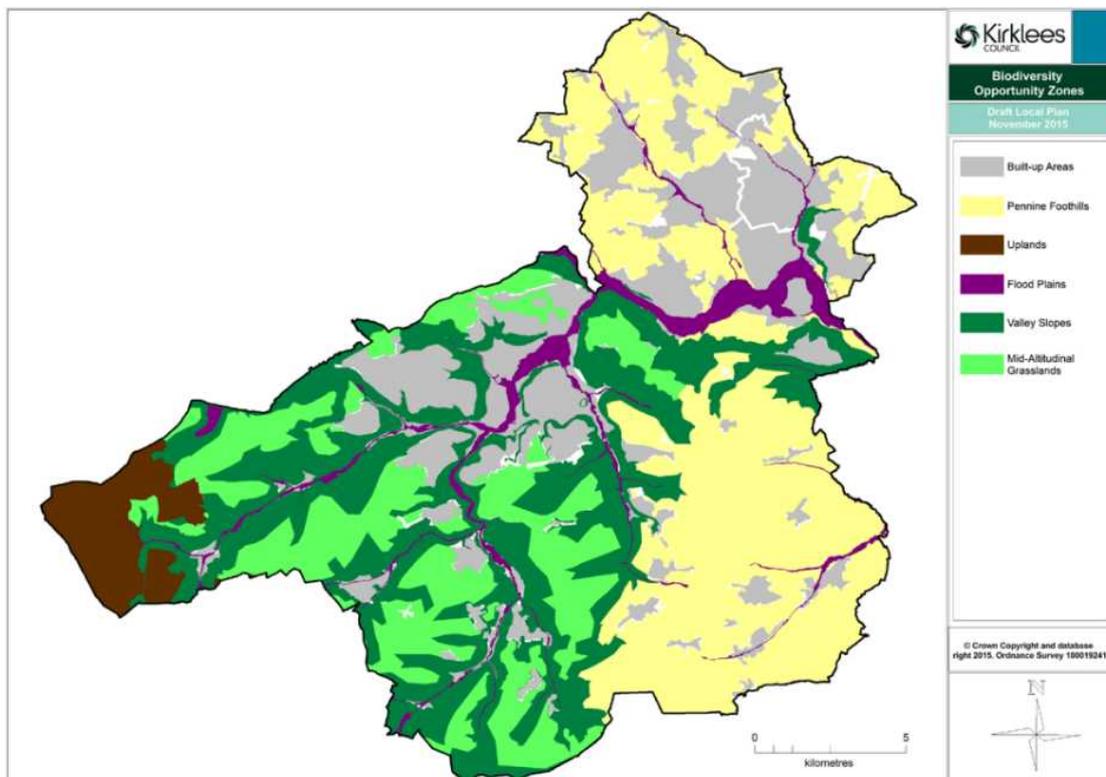
National Planning Practice Guidance, 2024

The Government’s National Planning Practice Guidance¹⁵ (NPPG) is intended to provide guidance to local planning authorities and developers on the implementation of the planning policies set out within the NPPF. The guidance of most relevance to ecology and biodiversity is the Natural Environment Chapter, which explains key issues in implementing policy to protect biodiversity, including local requirements. In addition, to the biodiversity net gain guidance¹⁶ which requires development to have a positive impact (‘net gain’) on biodiversity by delivering at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the on Site habitat.

Local Planning Policy

Biodiversity Opportunity Zones and Wildlife Habitat Network

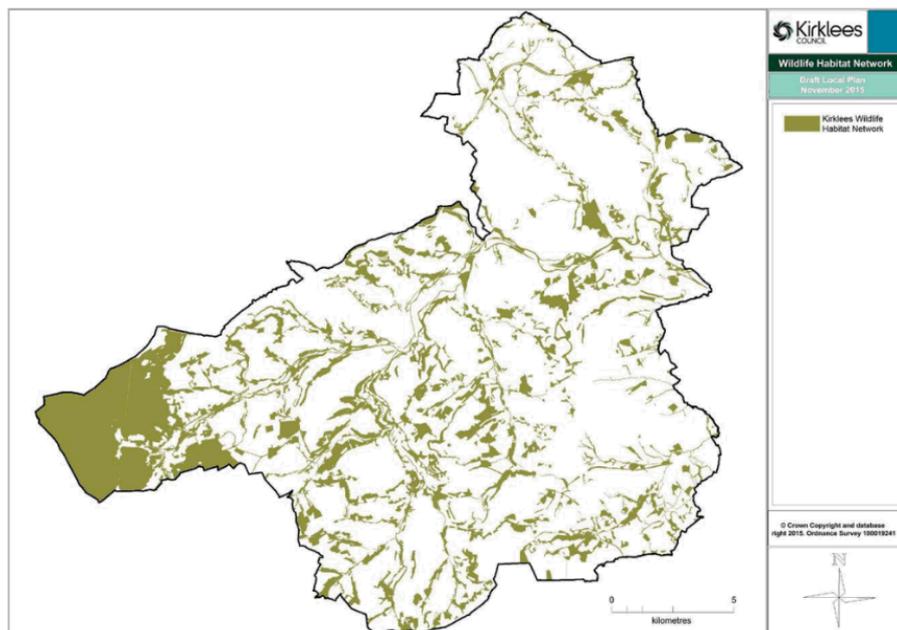
Kirklees Council are currently developing the Local Nature Recovery Strategy. It is understood that this will be informed by the biodiversity opportunity zones and wildlife habitat network which are under review. **Kirklees Biodiversity Opportunity Zones**



Kirklees Biodiversity Opportunity Zones

¹⁵ Department for Communities and Local Government. (2024). *National Planning Practice Guidance*. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance#full-publication-update-history>.

¹⁶ Department for Communities and Local Government. (2024). *National Planning Practice Guidance*. Available at: <https://www.gov.uk/guidance/biodiversity-net-gain>.



Local Biodiversity Action Plan

At a local level, the Site is covered by the Kirklees Biodiversity Action Plan 2009.

This Biodiversity Action Plan identifies six broad habitat types which have individual action plans enabling these to be prioritised in biodiversity work. 19 UK Habitats of Principal Importance are identified within this BAP, and three Local Habitats of Principal Importance. Scrub habitats are identified amongst these three, and are present within the site. However, these are mentioned with regards to primarily scrub in Valley Slopes and Pennine Foothills or amongst Open Mosaic Habitats on Previously Developed Land hosting the most importance.

Relevant Local Planning Policies

Biodiversity and Development

Development must:

- Avoid significant biodiversity loss through avoidance, mitigation, or compensation;
- Minimize impacts and provide net biodiversity gains with enhancements and habitat creation;
- Protect and enhance the Kirklees Wildlife Habitat Network, including creating new links where feasible;
- Integrate enhancements for priority species and habitats aligned with local Biodiversity Opportunity Zones.

LP31 - Strategic Green Infrastructure Network

The council prioritizes safeguarding and enhancing the Strategic Green Infrastructure Network and its assets.

Development within and near the Green Infrastructure Network must:

- Preserve or replace green infrastructure functions and connectivity.
- Integrate new or improved green infrastructure, such as greenspaces, woodlands, and street trees.
- Connect to existing and planned cycling, walking, and bridle routes, including the Core Walking and Cycling Network.
- Protect and enhance biodiversity and ecological links, particularly those connecting to the Kirklees Wildlife Habitat Network.

The council supports proposals for new or improved green infrastructure, provided they align with other Local Plan policies.

Appendix B. Condition Assessment Proforma

Appendix C. Good Practice Principles

The Scheme has been guided by the 10 Biodiversity Net Gain Good Practice Principles¹⁷ and will continue to do so when seeking to provide suitable off-site BNG delivery.

Table 4: Good practice BNG Principles

Principle	Definition
Principle 1. Apply the Mitigation Hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere	Avoid impacts on irreplaceable biodiversity - these impacts cannot be offset to achieve No Net Loss or Net Gain.
Principle 3. Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible, and share the benefits fairly among stakeholders.
Principle 4. Address risks	Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.
Principle 5. Make a measurable Net Gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
Principle 6. Achieve the best outcomes for biodiversity	<p>Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly-justified choices when:</p> <ul style="list-style-type: none"> Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses. Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation. Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels Enhancing existing or creating new habitat Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity
Principle 7. Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).
Principle 8. Create a Net Gain legacy	<p>Ensure Net Gain generates long-term benefits by:</p> <ul style="list-style-type: none"> Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity; Planning for adaptive management and securing dedicated funding for long-term management; Designing Net Gain for biodiversity to be resilient to external factors, especially climate change; Mitigating risks from other land uses; Avoiding displacing harmful activities from one location to another; and

¹⁷ Biodiversity Net Gain: Good practice principles for development © CIEEM, CIRIA, IEMA, 2016.

Principle	Definition
	Supporting local-level management of Net Gain activities
Principle 9. Optimise sustainability	Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
Principle 10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

Appendix D. Biodiversity Net Gain Headline Results

Headline Results		results menu	
Scroll down for final results 			
On-site baseline	Habitat units	5.78	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention (including habitat retention, creation & enhancement)	Habitat units	1.19	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	Habitat units	-4.59	-79.35%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Off-site baseline	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (including habitat retention, creation & enhancement)	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-4.59	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	

Network Rail
Waterloo General Offices
London
SE1 8SW

www.networkrail.co.uk