

ST MARK'S, KIRKBY, LIVERPOOL

Biodiversity Net Gain Assessment

October 2025



Report Control Sheet

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1 INTRODUCTION

1.1 SCOPE & PURPOSE

1.1.1. Collington Winter Environmental Ltd was commissioned by Wroot Design Ltd to prepare a Biodiversity Net Gain (BNG) Assessment for the proposed works at St Mark's, Kirkby, Liverpool. This report has been prepared to inform planning permission for the erection of four apartment blocks and associated landscaping.

1.1.2. The author of this report is Michael Boucher, Ecological Project Manager at Collington Winter Environmental Ltd and has been overseen by Katie Bird, Associate Director at Collington Winter Environmental. Katie is experienced in managing schemes and has produced many ecological reports to inform planning management plans.

1.1.3. This report has been written broadly following the Biodiversity Net Gain Report and Audit Templates (CIEEM, 2023).

1.2. LOCATION

1.2.1. Please refer to Figure 1.1 for the site location. The site is situated to the northeast of Kirby, a town in the Metropolitan Borough of Knowsley, Merseyside, England. (Grid reference: SJ 42097 99535)

Figure 1.1 Site Location



1.3. OBJECTIVES

1.3.1. The report has been produced to document the methods, results, and conclusions of a BNG Assessment undertaken based on the proposed development for the site to fulfil the following:

- Ensure that the mitigation hierarchy has been applied.
- Identify the baseline habitats present and provide a condition assessment.
- Identify the post development habitats on site, assess the possible target condition and provide an indication of the likely importance of those habitats.
- Calculate the overall change in biodiversity score from pre- post development.
- Provide design recommendations to maximise potential net gain achievable.
- Provide an indication of likely outcomes and indicative cost as required.

1.4 PLANNING CONTEXT

- 1.4.1 The Government 25-year Environment Plan states that government will “embed environmental net gain principle for development.”
- 1.4.2 National policy already sets out that planning should provide Biodiversity Net Gain (BNG) where possible. National Planning Policy Framework (NPPF) Paragraphs 174(d), 179(b) and 180(d) refer to this policy requirement and the Natural Environment Planning Practice Guidance (PPG) provides further explanation on how this should be done.
- 1.4.3 Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites will have to deliver at least 10% biodiversity net gain from January 2024. BNG will be required for small sites from April 2024. BNG will be measured using Defra’s biodiversity metric and habitats will need to be secured for at least 30 years. Key points regarding BNG are listed below:
- Minimum 10% gain required calculated using Biodiversity Metric & approval of net gain plan.
 - Habitat secured for at least 30 years via obligations/ conservation covenant.
 - Habitat can be delivered on-site, off-site or via statutory biodiversity units.
 - There will be a national register for net gain delivery sites.
 - The mitigation hierarchy still applies of avoidance, mitigation, and compensation for biodiversity loss.
 - Will also apply to Nationally Significant Infrastructure Projects (NSIPs)
 - Does not apply to marine development.
 - Does not change existing legal environmental and wildlife protections.
- 1.4.4 Developers will be required to undertake an assessment (using the nationally set BNG metric tool) of the current biodiversity value of their site both prior to and post the development proposal. In the event that the value of the site post-development is less than 10% better than it was prior to development then the developer will have an obligation to provide additional off-site BNG units to achieve the mandatory 10% net gain.

2 METHODS

2.1 EXISTING HABITAT (BASELINE)

- 2.1.1. A walkover of the site was undertaken by Andrew Taylor, Lead Field Ecologist at Collington Winter Environmental Ltd on the 12th of September 2025. The weather was overcast (5/8 oktas), with no precipitation, wind speed 1 and 17°C. The methods were based on the standard methodology as detailed by UK HAB Methodology. A UK HAB Plan has been provided in Appendix 3 of this report
- 2.1.2. Buildings were previously present and were identified on imagery in March 2025. As buildings are defined as 'developed land; sealed surface' with null habitat unit value, it was considered more reflective of the site baseline habitats to be in line with current habitats classification and conditions.

2.2 PLANNING LAYOUT (POST-DEVELOPMENT)

- 2.2.1 The Landscape Plan created by Wroot Design Architects (reference: 593-P-01) has provided a red line boundary as well as the habitats to be incorporated within the site (Appendix 4).

2.3 STATUTORY BIODIVERSITY METRIC

- 2.3.1 The BNG calculation was undertaken utilising The Statutory Biodiversity Metric from DEFRA, the site's UK Habitat map and the Site Plan. The calculation was performed by a technically competent and experienced ecologist as detailed in British Standard BS8683 – Suitably qualified person – definition in BS8683:2020.
- 2.3.2 The Statutory Biodiversity Metric uses habitat features as a proxy measure for capturing the value and importance of nature. The metric considers the size, ecological condition, location and proximity to nearby 'connecting' features. The metric enables assessments to be made of the present and forecast future biodiversity value of a site.

2.4 HABITAT SCORING

- 2.4.1 The Statutory Biodiversity Metric supplies reference documents and user guides in which to accurately evaluate and assess the different habitats on site. The methodology for the baseline and post development calculations are demonstrated in the following sections.

Baseline Units

- 2.4.2 To assess the quality of a habitat and therefore calculate the units scored the Statutory Biodiversity Metric utilises three scoring factors as detailed below.

Condition

- 2.4.3 The condition of a habitat is assessed utilising the Condition Sheets provided for each habitat type. These list positive indicators for each habitat and indicate how many of these indicators need to be present to meet certain thresholds of condition. These condition sheets can be found in The Statutory Biodiversity Metric habitat condition assessment sheets with instructions tool Technical (Natural England Joint Publication, 2023).

Distinctiveness

- 2.4.4 The distinctiveness of each habitat (area and linear) is automatically assigned by the tool, based upon national records of the occurrence and rarity of each habitat (The Statutory Biodiversity metric).

Strategic Significance

- 2.4.5 The idea of strategic significance works at a landscape scale. It gives additional unit value to habitats that are in preferred locations for biodiversity and other environmental objectives. Strategic significance utilises published local plans and objectives to identify local priorities for targeting biodiversity and nature improvement, such as Nature Recovery Areas, local biodiversity plans, National Character Area objectives and green infrastructure strategies.

Post Development Units

- 2.4.6 Additional factors are implemented when assessing post development habitats.
- Difficulty of Creation/Enhancement

- Temporal Risk “Time to target condition”.
- Spatial Risk (when offsite mitigation is necessary)

2.5 LIMITATIONS OF ASSESSMENT

2.5.1 Whilst every effort has been made to provide a comprehensive description of the site, no investigation could ensure the complete characterisation and prediction of the natural environment. The conclusions and recommendations detailed in this report are based upon the site redline boundary and the development proposals as outlined by the client at the time of writing. Should there be any changes to the site redline boundary or development proposals at a later stage, this assessment should be reviewed to determine whether any amendments or additional survey work is required.

2.5.2 Habitat areas (predevelopment) have been measured using online mapping and therefore will not be completely accurate.

Table 2.1 Limitations Review

Limitation	Analysis
Competence of surveyor	Condition Assessment was undertaken by Andrew Taylor, Lead Field Ecologist and has been overseen by Olivia Collington who holds 10 years' experience. Olivia Collington BSc (Hons), MEnvSc, CEnv, Managing Director at Collington Winter Environmental Ltd has over 10 years professional experience in ecological consultancy and holds key experience undertaking BNG assessments and providing advice on habitat creation, management and enhancements for both developers and habitat banks.
Competence of ecologist completing the metric	The metric was completed by Michael Boucher and overseen by Katie Bird who holds over 9 years' experience.
Age of survey data	The condition assessment was undertaken in September 2025 and is therefore less than 12 months old. There is no constraint to the age of survey data and this falls within best practice guidance.
Timing of survey	The survey was undertaken in September which is considered a suitable time of year to undertake condition assessments for BNG.
Departure from best practice guidance	No departure from best practice guidance.

3 BASELINE CONDITIONS - HABITATS

3.1. STRATEGIC SIGNIFICANCE

3.1.1. The site falls under the jurisdiction of Liverpool City Region Council who have drafted a Local Nature Recovery Strategy however the finalised version has not yet been released. The draft also does not identify a suitable alternate document for assessing strategic significance and therefore the majority of habitats are defined as “Area/compensation not in local strategy/ no local strategy”.

3.1.2. All urban trees are defined as “formally identified within local strategy”.

3.2. HABITATS PRE-DEVELOPMENT

3.2.1. Table 3.1 summarises the baseline habitats and area size. Please refer to the Appendix 1 for the Condition Assessment Sheets for each habitat. Photographs can be found in Appendix 5.

Table 3.1 Habitat Type and Condition Assessment (pre-development)

Habitat Type	Irreplaceable habitat	Area (hectares)	Distinctiveness	Score	Condition	Score	Notes
Ruderal/Ephemeral	No	0.2914	Low	2	Moderate	2	A parcel of ruderal/ephemeral vegetation was located to the southeast of site. Species included mugwort (<i>Artemisia vulgaris</i>), scentless mayweed (<i>Tripleurospermum inodorum</i>), black nightshade (<i>Solanum nigrum</i>), colt's-foot (<i>Tussilago farfara</i>), red clover (<i>Trifolium pratense</i>), ribwort plantain (<i>Plantago lanceolata</i>), butterfly-bush (<i>Buddleja davidii</i>), broad-leaved dock (<i>Rumex obtusifolius</i>), prickly sow-thistle (<i>Sonchus asper</i>), fat-hen (<i>Chenopodium album</i>)
Developed land; sealed surface	No	0.0228	V.Low	0	N/A - Other	0	A small parcel of developed land; sealed surface was found to the northwest of the site.
Vacant or derelict land	No	0.1123	Low	2	Poor	1	A parcel of vacant or derelict land was located to the south of the developed land; sealed surface.
Modified grassland	No	0.2495	Low	2	Poor	1	A parcel of modified grassland made up most of the western parcel of the site. Species included false oatgrass (<i>Arrhenatherum elatius</i>), creeping bent (<i>Agrostis stolonifera</i>), cock's-foot (<i>Dactylis glomerata</i>), curled dock (<i>Rumex crispus</i>), and dandelions (<i>Taraxacum spp.</i>)
Individual Trees	No	0.0041	Medium	4	Good	3	One small silver birch tree, good condition
Individual Trees	No	0.0122	Medium	4	Moderate	2	Three small Silver Birch trees, moderate condition
Individual Trees	No	0.0041	Medium	4	Moderate	2	One small, small leaved lime tree, moderate condition

3.3. HABITAT LOSS AND RETENTION

3.3.1. All the onsite habitats are to be lost to the proposed development.

3.4. PRE- DEVELOPMENT HABITAT BASELINE

3.4.1. Please refer to Table 3.2 summarising the Habitat Baseline for the calculation, demonstrating habitats to be retained, enhance and/or lost.

Table 3.2 Habitat Baseline

	<i>On site Baseline</i>	<i>Retained</i>	<i>Enhanced</i>	<i>Lost</i>
<i>Habitat (Area) Units</i>	<i>2.10</i>	<i>0</i>	<i>0</i>	<i>2.10</i>

4 HABITAT CREATION

- 4.1.1. Areas of developed land; sealed surface relating to the onsite buildings are to be created totalling 0.2665 ha.
- 4.1.2. Areas of developed land; sealed surface relating to car parking and roads are to be created totalling 0.2460 ha.
- 4.1.3. Areas of introduced shrub are to be planted around the site totalling 0.0768 ha.
- 4.1.4. Areas of modified grassland are to be created around the site, totalling 0.0910 ha.
- 4.1.5. On top of the modified grassland, 150 trees are to be planted.
- 4.1.6. Please refer to Appendix 2 for details of the condition criteria targeted for each habitat group (where appropriate). The proposed created habitats are illustrated on the Landscape Plan provided (Appendix 4).

Table 4.1 Habitat Creation

Proposed habitat	Area (hectares)	Distinctiveness		Condition		Habitat Units Delivered
		Distinctiveness	Score	Condition	Score	
Developed land; sealed surface	0.2665	V.Low	0	N/A - Other	0	0.00
Developed land; sealed surface	0.246	V.Low	0	N/A - Other	0	0.00
Modified grassland	0.091	Low	2	Poor	1	0.18
Introduced shrub	0.0768	Low	2	Condition Assessment N/A	1	0.15
Urban tree	0.6107	Medium	4	Moderate	2	2.07

5 SUMMARY

5.1.1. The current baseline value of the application site is assessed as 2.10 habitat units. To achieve the statutory 10% Biodiversity Net Gain, the scheme must deliver a total of 2.31 habitat units.

5.1.2. Based on the proposed habitat creation measures, the development results in a net gain of 13.78%, with all trading rules satisfied.

5.1.3. Headline results from the Biodiversity Metric Calculation Tool are summarised in Figure 5.1.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	0.29
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	13.78%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	2.10	2.31	0.00
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

No additional area habitat units required to meet target ✓

No additional hedgerow units required to meet target ✓

No additional watercourse units required to meet target ✓

Figure 5.1 Headline results extracted from the Biodiversity Metric Calculation Tool

6 BIBLIOGRAPHY

- CIEEM (2021) Biodiversity Net Gain Report and Audit Templates.
- DEFRA (2023) The Statutory Biodiversity Metric: Auditing and Accounting for Biodiversity
- DEFRA (2023) The Statutory Biodiversity Metric: Auditing and Accounting for Biodiversity. Condition Assessment Sheets (Excel Format)

APPENDIX 1- CONDITION ASSESSMENT SHEETS

Suggested enhancement interventions to improve condition score
Footnotes
Footnote 1 – Creeping thistle <i>Cirsium arvense</i> , spear thistle <i>Cirsium vulgare</i> , curled dock <i>Rumex crispus</i> , broad-leaved dock <i>Rumex obtusifolius</i> , common nettle <i>Urtica dioica</i> , creeping buttercup <i>Ranunculus repens</i> , greater plantain <i>Plantago major</i> , white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i> .
Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.
Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.
Footnote 4 – Wildlife and Countryside Act 1981 (as amended).

Condition Sheet: INDIVIDUAL TREES Habitat Type														
Habitat Types														
Individual trees – Urban trees Individual trees – Rural trees Complete a condition sheet for each tree or block of trees. Please see the separate Line of trees condition sheet for a line of <u>rural</u> trees. You should only use the Line of trees condition assessment and record that habitat type in <u>rural</u> locations.														
Habitat Description														
Individual trees (description applied to the urban or rural environment): Young trees over 7.5 cm in diameter at breast height whose canopies are not touching. Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only): Groups or stands of trees (size requirement as defined above) within and around the perimeter of urban land. This includes those along urban streets, highways, railways and canals, and also former field boundary trees incorporated into developments. Canopies should predominantly overlap continuously. Groups of urban trees that don't match the descriptions for woodland may be assessed within this category.														
On-site or off-site, site name and location				Survey date and Surveyor name										
				Survey reference (if relating to a wider survey)										
Limitations (if applicable)				Habitat parcel reference										
				29987334 - T1	29987342 - T2	29987353 - T3	29987358 - T4	29987361 - T5						
				Grid reference										
Condition Assessment Criteria														
				Criterion passed (Yes or No)										Notes (such as justification)
A	The tree is a native species (or at least 70% within the block are native species).	Yes	Yes	Yes	Yes	Yes								
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).	Yes	Yes	Yes	Yes	Yes								
C	The tree is mature (or more than 50% within the block are mature) ¹ .	No	No	No	No	No								
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Yes	Yes	Yes	Yes	Yes								
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Yes	No	No	No	No								
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	Yes	Yes	Yes	Yes								
Number of criteria passed		5	4	4	4	4								
Condition Assessment Result (out of 6 criteria)		Condition Assessment Score		Score Achieved ×/√										
Passes 5 or 6 criteria		Good (3)		Yes										
Passes 3 or 4 criteria		Moderate (2)			Yes	Yes	Yes	Yes						

Passes 2 or fewer criteria	Poor (1)															
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.																
Suggested enhancement interventions to improve condition score ²																

Condition Sheet: URBAN Habitat Type																
Habitat Types																
Sparsely vegetated land - Ruderal/Ephemeral Sparsely vegetated land - Tall forbs Urban - Allotments Urban - Biodiverse green roof Urban - Bioswale Urban - Cemeteries and churchyards Urban - Facade-bound green wall Urban - Ground based green wall Urban - Intensive green roof Urban - Open mosaic habitats on previously developed land Urban - Rain garden Urban - Sustainable drainage system (SuDS) Urban - Vacant or derelict land Urban - Bare ground																
Habitat Description																
See the Statutory Biodiversity Metric User Guide for green roofs, and UK Habitat Classification (UKHab) for other habitats:												ukhab – UK Habitat Classification				
On-site or off-site, site name and location			Survey date and Surveyor name													
			Survey reference (if relating to a wider survey)													
Limitations (if applicable)			Habitat parcel reference													
			29946275	29946279												
			Grid reference													
Condition Assessment Criteria																
			Criterion passed (Yes or No)										Notes (such as justification)			
Core Criteria - must be assessed for all urban habitat types :																
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.		No	No												
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.		Yes	No												
C	Invasive non-native plant species (listed on Schedule 9 of WCA ¹) and others which are to the detriment of native wildlife (using professional judgement) ² cover less than 5% of the total vegetated area ³ . Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).		Yes	Yes												
Additional Criterion - must be assessed for Open mosaic habitat on previously developed land only:																
D	The parcel shows spatial variation and forms a mosaic of bare substrate PLUS: - At least four early successional communities (a) to (i); Communities: (a) annuals; (b) mosses/liverworts; (c) lichens; (d) ruderals; (e) inundation species; (f) open grassland; (g) flower-rich grassland; (h) heathland, (i) pools.		No	No												
Additional Criteria - must be assessed for Bioswale and SuDS habitat types only:																
E1	Plant species are mostly native. If non-native species are present, they should not be detrimental to the habitat or native wildlife ⁴ .		No	No												
E2	The vegetation is comprised of plant species suited to wetland or riparian situations.		No	No												
Additional Criterion - must be assessed for Intensive green roofs only:																
F	The roof has a minimum of 50% native and non-native wildflowers. 70% of the roof area is soil and vegetation (including water features).		No	No												
Additional Criterion - must be assessed for Biodiverse green roofs only:																

G	The roof has a varied depth of 80 – 150 mm; at least 50% is at 150 mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. Note – to achieve Good condition, some additional habitat, such as sand piles, stones, logs etc. are present.	No	No									
Essential criteria relevant for habitat type achieved (Yes or No)		No	No									
Number of criteria passed		3	2									
Condition Assessment Result		Condition Assessment Score		Score Achieved ✕/✓								
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):												
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C.		Good (3)										
• Passes 2 of 3 core criteria; OR • Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)		Yes								
• Passes 0 or 1 of 3 core criteria.		Poor (1)			Yes							
Results for Green roofs and Open mosaic habitat on previously developed land (requiring assessment of 4 criteria only - core criteria plus additional criterion specified for habitat type):												
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes additional criterion relevant to specific habitat type (D, F or G).		Good (3)										
• Passes 2 or 3 of 4 criteria; OR • Passes 4 of 4 criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)										
• Passes 0 or 1 of 4 criteria.		Poor (1)										
Results for Bioswale or SuDS (requiring assessment of 5 criteria - core criteria plus additional criteria specified for habitat type):												
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes all additional criteria relevant to specific habitat type (Group E)		Good (3)										
• Passes 3 or 4 of 5 criteria; OR • Passes 5 of 5 criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)										
• Passes 2 or fewer of 5 criteria.		Poor (1)										
Suggested enhancement interventions to improve condition score												
Footnotes												

APPENDIX 2 – POST DEVELOPMENT TARGET HABITAT CONDITIONS

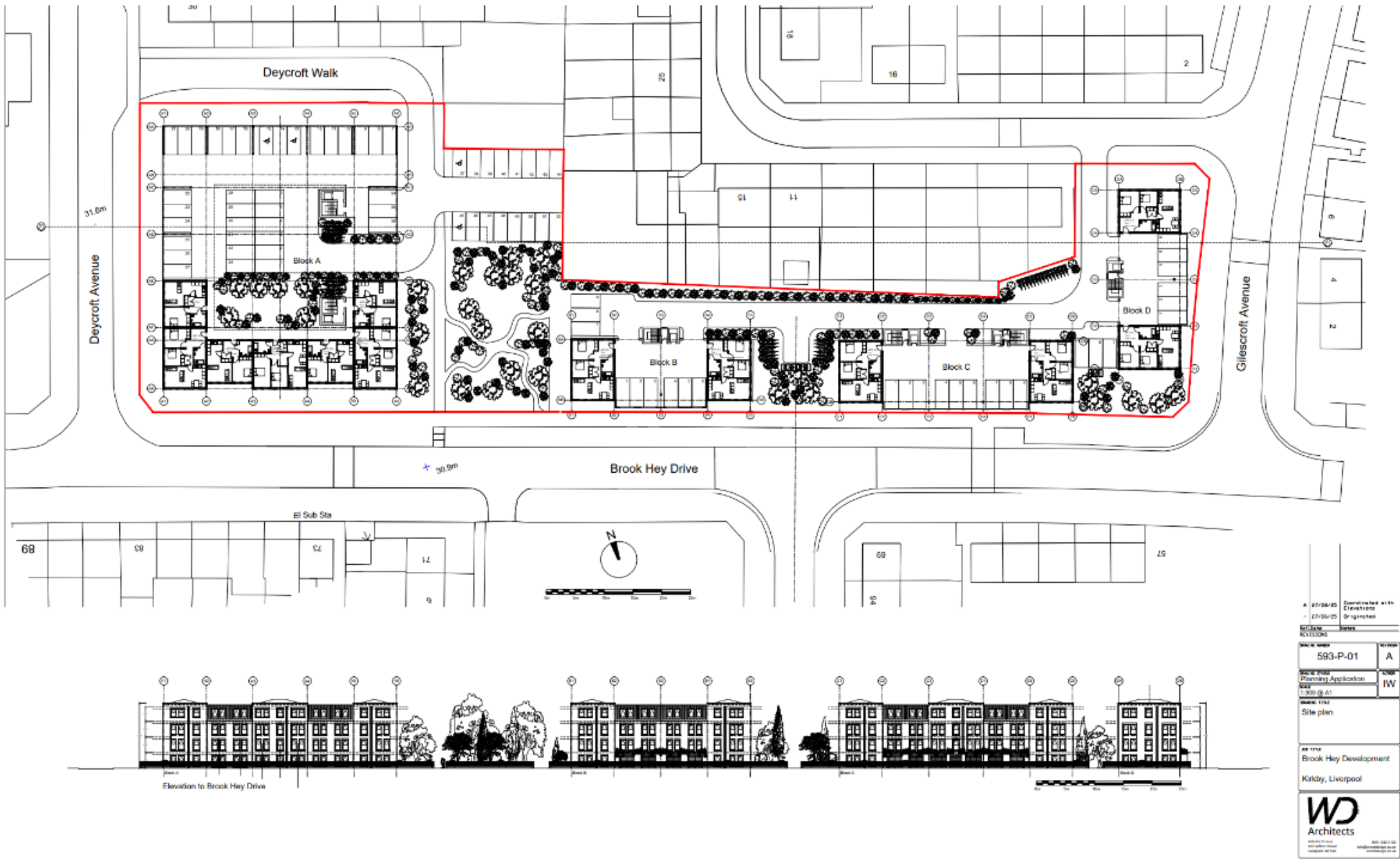
Habitat Type: Modified Grassland		Target Condition: Poor
Condition Assessment Criteria		Targeted
A	There are 6-8 vascular plant species per m2 present, including at least 2 forbs (these may include those listed in Footnote). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m2 (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	No
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.	No
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus agg.</i> may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Yes
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.	No
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	No
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes
G	There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA4).	Yes

Habitat Type: Individual Trees		Target Condition: Moderate
Condition Assessment Criteria		Targeted?
A	The tree is a native species (or more than 70% within the block are native species).	No
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).	Yes
C	The tree is mature (or more than 50% within the block are mature).	No
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Yes
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes

APPENDIX 3 UK HAB MAP



APPENDIX 4 POST DEVELOPMENT LANDSCAPING PLAN



APPENDIX 5: SITE PHOTOGRAPHS

HABITAT	PHOTOGRAPH	
Ruderal/Ephemeral		
Developed land; sealed surface		
Vacant or derelict land		

Modified grassland



Urban tree



