Brooks Ecological
An Origin Enterprises Company

Unit 1 Wordsworth Business Park

Biodiversity Net Gain Assessment

Report Ref. ER-9254-03C

19/10/2026

Wordsworth Property Partnership

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Report reference			**ER-9254-03C – Biodiversity Net Gain Assessment**
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Date			04/08/2026
Rev: A	**Date:** 30/07/26	Author: SW	Updated redline area to include access
Rev: B	**Date:** 04/08/26	Author: SW	Updated to reflect most recent landscape plan and RLB
Rev: C	**Date:** 19/10/26	Author: RHW	Updated to respond to LPA comments.
Report duration			In accordance with CIEEM (2019), unless otherwise stated the findings of this report remain valid for a period of 18 months. After this period advice should be sought on the scope of any updating work required.

CIEEM REGISTERED PRACTICE 2025-2026

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Introduction

1. Brooks Ecological Ltd was commissioned by Wordsworth Property Partnership to carry out a Biodiversity Net Gain (BNG) Assessment of the proposed development Site at Unit 1 Wordsworth Business Park.
2. The assessment applies to the parcel of land shown in Figure 1 opposite.
3. The assessment is informed by a Preliminary Ecological Appraisal Survey of the Site detailed in our report ER-9254-01.
4. Biodiversity Accounting metrics are used to quantify the value of a site in Biodiversity Units. This helps in assessing the ecological impacts of the proposed development and can help to inform avoidance, or on-Site mitigation levels required; or as a last resort can translate to a direct monetary value where compensation (off-Site) is required.
5. For the purposes of metric calculations, the Site area has been measured using GIS against the provided red line boundary as 2.23ha.
6. Our assessment has made use of the Statutory Biodiversity Metric Calculation Tool, and extracts from this have been used throughout the report. The full spreadsheet has been provided digitally as file BM-9254-Proposed 260804_1401A and should be submitted as part of the application.

Limitations

The redline boundary has been produced through georeferencing the supplied plans to the highest accuracy achievable. Positional accuracy cannot be fully verified; mapped features should be interpreted as spatial estimates rather than exact on-ground locations.

Figure 1 Extent of BNG assessment (red line boundary).

Pre-development baseline

Habitats identified

7. Habitats present on-Site are outlined in Table 1, opposite. These are shown in relation to location and extent in Figure 2 overleaf.

Condition Assessment

8. Habitat condition has been assessed as part of the Preliminary Ecological Appraisal of the Site.
9. Information on condition assessments is provided in the Excel spreadsheet CA-9254-01 provided alongside this report.

Strategic Significance

10. None of the habitats on-Site fall within or close to the Wildlife Habitat Network, and so all are mapped as 'area/compensation not in local strategy/ no local strategy'.

Irreplaceable habitat

11. Irreplaceable habitats have not been found on Site.

Habitat Degradation[1]

12. There is no evidence on Site or in aerial mapping of the Site which suggests that it has been deliberately degraded.

Biodiversity Metric

13. Habitat types, conditions, and areas have been entered into the Statutory Biodiversity Metric Calculation Tool, alongside information on their strategic significance.
14. The Statutory Biodiversity Metric Calculation Tool (published 03/07/2025), is provided alongside this assessment, in Excel spreadsheet BM-9254-Proposed 260804_1401A and may be useful in investigating design options for the Site.

Table 1 Habitat Types.

Habitat	Distinctiveness	Condition	Condition sheet
Mixed scrub	Medium	Poor	20
Bramble scrub	Medium	N/A	n/a
Bare ground	Low	Moderate	22
Modified grassland	Low	Moderate	5
Artificial unvegetated, unsealed surface	V.Low	N/A - Other	n/a
Developed land; sealed surface	V.Low	N/A - Other	n/a
Tall forbs	Low	Poor	22

[1] See Appendices for further information on degradation.

Figure 2 The Site's habitats assigned to types used in the Biodiversity Metric. Labelled codes cross-reference to our condition assessment and description in the PEAR, which should be read in conjunction with this report.

Trading Rules

15. As part of delivering a Net Gain for biodiversity, the BNG process requires that trading rules are complied with, such that loss of habitats is compensated for in a like-for-like or like-for-better fashion. This is based on habitat distinctiveness.
16. Once trading rules are complied with, the 'gain' component can come from any distinctiveness category.

Habitat Unit Score

17. The Site has been assessed as having a baseline score of 0.54 Habitat Units. These break down as shown in Table 2, opposite.

Table 2 Habitat Units broken down by distinctiveness at this Site.

Distinctiveness	Units	Approach to compensation if lost
Very Low	0.00	No compensation required.
Low	0.37	Can be replaced with any habitat of the same distinctiveness (low) or any habitat from a higher distinctiveness (Medium, High or Very High)
Medium	0.17	Can not be replaced with habitats from a lower distinctiveness. Compensation needs to be like for like, or like for better. This means it can only be replaced by habitat from the same broad categories in Medium distinctiveness or any habitat from a higher distinctiveness category (High or Very High).
High	0.00	Can only be replaced with the same habitat.
Very High	0.00	Can only be replaced with the same habitat; bespoke compensation required.
Irreplaceable	0.00	Bespoke compensation required, outside of BNG.

Post-development value[2]

18. This section calculates the Biodiversity Unit value of the post-development Site and quantifies any gain or shortfall in Units.

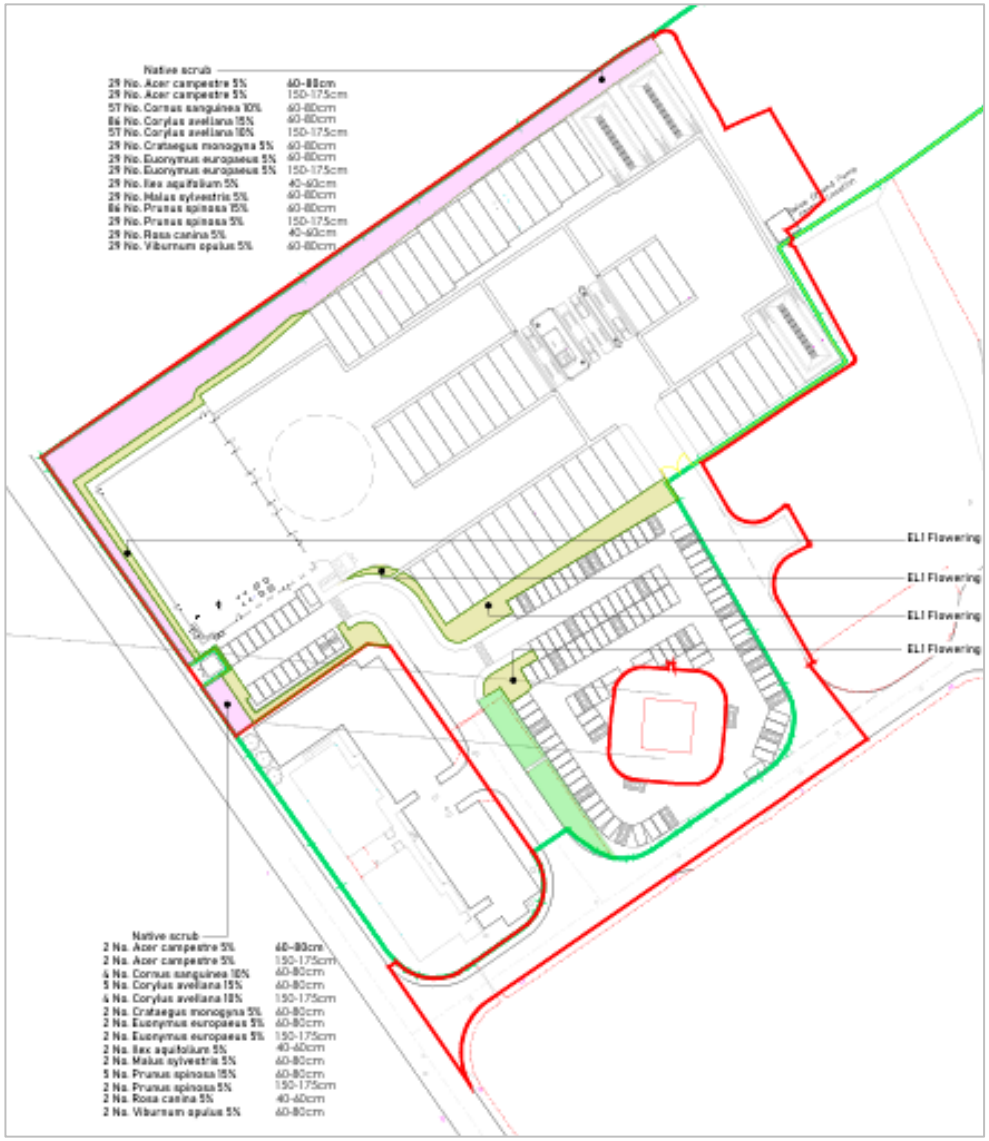
Proposed habitats

19. Habitats present on-Site post-development have been based on the Landscape Masterplan (Figure 3, opposite) dwg. DR-9254-01 rev. Rev B (Brooks Landscape, July 2026).
20. Planting types specified in the Landscape Masterplan have been assigned a UK Habitat Classification description that best fits the target habitat.
21. Habitats assigned are shown in Figure 4 overleaf.

Condition assessment

22. The condition assessment for each proposed habitat is based on what is realistic and achievable for the Site, based on the Landscape Masterplan.
23. Achieving these condition scores will not be reliant on specific, ecologically driven management recommendations meaning a Habitat Management and Monitoring Plan (HMMP) may not necessarily be required as a condition of planning.

Figure 3 Landscape Masterplan dwg. DR-9254-01 rev. Rev B (Brooks Landscape, July 2026).



[2] Please see assumptions section at end of report

Post-development habitats

Habitat Score

24. The Site has been assessed as having a post-development score of 0.85 Habitat Units.
25. This score is based on our interpretation of the Landscape Masterplan, as shown in Figure 4 opposite.
26. Calculations for the change in Habitat Units have been based on the majority of the site being cleared of existing habitats and land reprofiled.
27. Post-development calculations include Habitat Units gained through the creation of small areas of modified grassland and boundary screening of native mixed scrub. An area of existing modified grassland will be retained.
28. Roads, driveways, footpaths and buildings have all been mapped as *developed land; sealed surface*, which contribute no Habitat Units to the post-development score.

Figure 4 Post-development habitats.

Habitat Retention

29. The plan opposite shows the areas of the Site which it will be possible to retain without impact. This information allows us to see which areas can be identified as retained or enhanced in the metric calculations.

30. This plan is based on information provided by the developer who will have considered / consulted their team on requirements to provide (amongst other things) Site compounds, to store and move materials, to install drainage, flood storage, access and services - all with suitable easements.

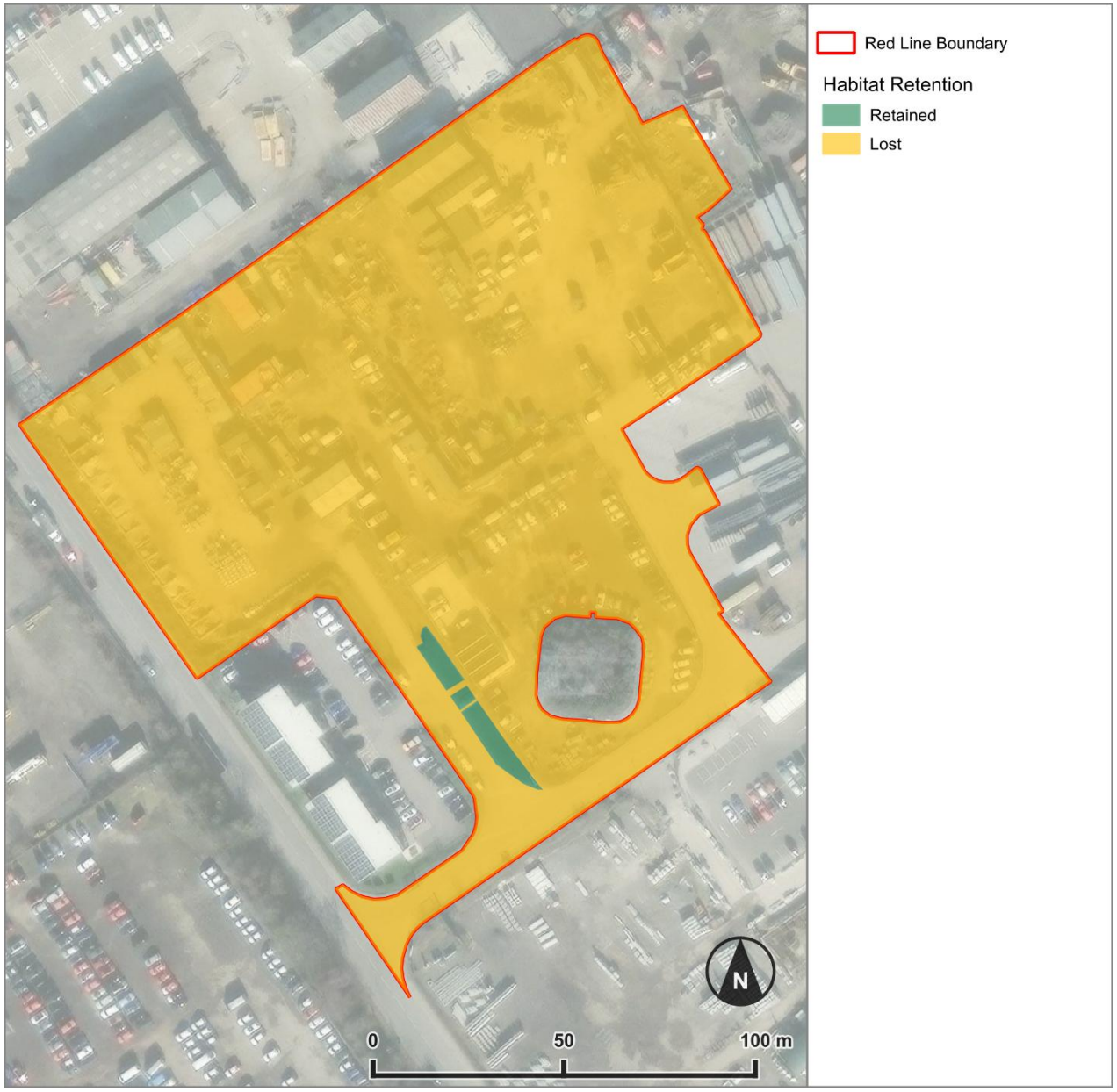
31. At this stage metric calculations assume that it will be possible to fence off and protect the areas shown opposite from <u>any</u> impacts of Site clearance and construction and that any enhancement can be carried out alongside relevant phases of the proposed development.

32. Where no retention is shown on the plan opposite; it has not been possible to identify retained / enhanced areas and the metric calculations assume the loss and replacement of all habitat from the Site.

The BNG Hierarchy

33. The project's engagement with the Mitigation Hierarchy is set out in Appendix 1.

Figure 5 Habitat retention.



Change in Unit Value

34. The Statutory Metric has been used to calculate the net unit change for the Site, the predicted net change is as follows.

Table 3 Unit net change

	Unit Difference (+/-)	Unit Percentage Difference (+/-)	Units required to meet 10%
Habitat Units	0.26	47.96 %	0.00

35. A copy of the Statutory Biodiversity Metric Calculation Tool Excel spreadsheet (ref. BM-9254-Proposed 260804_1401A) and Condition Assessment sheets (CA-9254-01) have been provided with this report and should be submitted digitally as part of the application.

Trading Rules

36. Habitat types are separated out into distinctiveness categories (Very Low to Very High) which dictate what mitigation/compensation is required for their loss. This is assessment is separate to the 'net unit change' score quoted above.

37. To satisfy Trading Rules, specific mitigation is only required for the loss of Medium distinctiveness habitat types and above. Trading Rules will automatically be satisfied for the loss of any Low distinctiveness habitat types once a no net loss position is reached.

38. Trading rules have been satisfied.

Requirements for Planning

39. There is mandatory requirement for all developments to demonstrate at least a 10% net gain in each unit measurement, as well as to satisfy Trading rules. A standard planning condition will be imposed on all decision notices to ensure this is met.

40. The proposed development is able to demonstrate a 10% net gain and satisfies Trading Rules.

41. Provision should be made by the LPA and developer to secure the necessary gains through the relevant planning condition(s).

42. A Net Gain Plan will be required to discharge relevant pre-start planning conditions.

43. A 30-year Habitat Monitoring and Management Plan (HMMP) may be required to discharge relevant pre-start planning conditions. Although, as the BNG score here relies on on-site habitat of limited value, the LPA may see imposing an HMMP requirement as disproportionate in this instance.

Assumptions made and information required at next stages

44. Establishment of the post development value of the Site at this stage is necessarily based on several assumptions which we have set out below, please provide the additional information required against each if this is available:

	Factor	Information Required
1	Timing The BNG metric includes options to identify habitat creation which is deferred (by x years after it is lost) or habitat which is created in advance (elsewhere prior to its loss from Site). These are subject to multipliers and will affect your ultimate BNG score. Unless you have told us otherwise, we have assumed a 2-year build programme and a delay of 2 years between loss of habitat and creation of new. Calculations will need to be re-run if changes to the project plan result in a change to this figure.	Please provide a realistic timescale for the period between loss of habitat (Site clearance) and the completion of new on-Site habitat areas.
2	Phasing Unless you have told us otherwise, we have assumed that development will not be phased (in planning terms) and that habitat will be lost and created in a single phase.	Please confirm whether development will be phased.
3	Habitat Retention Unless you have provided a habitat retention plan showing areas where habitat can be retained un-disturbed, we have assumed that all mapped habitat will be lost from the Site and then replaced.	Please provide a habitat retention plan showing area which can be retained unaffected by clearance, excavation, storage, compounds etc. Identify also any areas of temporary impacts – these may be impacted by the above but can be returned to the same habitat within 2 years.
4	Other limiting factors Ecological conditions are likely to be the primary factors determining the potential of the site to deliver Biodiversity Units, these would normally be established through a Preliminary Ecological Appraisal (PEA). Where a PEA has not been carried out, we have assumed that ecological factors are not limiting. Where a PEA has been carried out by a third party, we have assumed that the information provided is suitable and accurate. There are other limiting factors falling outside of the remit of ecological assessment which could also affect delivery, these may not be apparent to us at this stage. As part of any future management plans produced to deliver Biodiversity Units it will be necessary to assess information on (though not limited to) the following factors - any of which could have a bearing on the site's potential: • Designated Sites (these may have been considered if desk-study has been part of the scope) • Protected and Notable Species (these may have been considered if desk-study has been part of the scope)	Provide information and reports or references any of the factors which you know will be, or could be, limiting in terms of habitat creation.

	Factor	Information Required
	• Invasive and Non-native Species • Land tenure and public access • Climate • Geology / topography • Agricultural land status • Soils and substrates • Contaminated Land • Hydrology and Drainage • Flood Risk • Landscape Character and Designations • Historic Environment and Earth Heritage • Services and Infrastructure • Land ownership These factors may be outside of the remit of this report (especially where a PEA has not been produced) and the expertise of an ecologist. We cannot be responsible for the impact of any of these factors on the potential of the site to deliver Biodiversity Units. Where other information is not made available, we have assumed they are not limiting	

References

Chartered Institute of Ecology and Environmental Management (CIEEM). 2019. *Advice note: on the lifespan of ecological reports and surveys.* Winchester: Chartered Institute of Ecology and Environmental Management. [Online]. Available from: https://cieem.net/resource/advice-note-on-the-lifespan-of-ecological-reports-and-surveys/

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Appendices

The following reports/digital documents have been provided alongside this report and should be read in conjunction with it:

- BM-9254-Proposed 260804_1401A– Statutory Biodiversity Metric Calculation Tool
- CA-9254-01 – Statutory Biodiversity Metric Condition Assessments
- ER-9254-01 – Preliminary Ecological Appraisal

Habitat degradation

Within Schedule 14 of the Environment Act, which sets out the biodiversity gain condition for development, measures are included that allow planning authorities to recognise any habitat degradation since **30th January 2020** and to take the earlier habitat state as the baseline for the purposes of biodiversity net gain. In order to ascertain the habitats present and their condition on 30th January 2020, aerial imagery or data sets from that time could be used. 30th January 2020 is the relevant date as it was the day the Bill entered Parliament.

In 2023, the Levelling Up and Regeneration Act 2023 (LURA), introduced additional wording further tightening the law regarding degradation by extending the circumstances in which degradation can be addressed. This wording covered both authorised and unauthorised activity on onsite and offsite habitats, on or after **25th August 2023**.

Further information

Further useful information is available on legal agreements to secure Biodiversity Gains at:

- https://www.gov.uk/guidance/legal-agreements-to-secure-your-biodiversity-net-gain
- https://naturalengland.blog.gov.uk/2024/03/04/securing-off-site-biodiversity-net-gain-expert-legal-perspectives/

Appendix 1 - BNG Hierarchy

Level of Hierarchy	Advice provided at PEA/BNG Baseline Stage	Response in designs	Linked documents / plans
First **Avoid**	Clearance of the Medium-distinctiveness habitats should be avoided wherever possible, and minimised where it is not avoidable.	It has not been possible, and is not really appropriate, to retain the very small areas of these habitats in their existing locations.	Landscape Masterplan dwg. DR-9254-01 rev. Rev B (Brooks Landscape, July 2026).
then **Enhance**	Retained habitats on-Site should be enhanced where possible as an important source of Habitat Units post-development. The majority of the modified grassland (poor and moderate condition) and mixed scrub (poor condition), present the greatest opportunities for enhancement.	The retained modified grassland is already in good condition and enhancement is not possible.	Landscape Masterplan dwg. DR-9254-01 rev. Rev B (Brooks Landscape, July 2026).
then **Create**	Where possible residual loss of Units should be made up for with Habitat Units generated through the creation of new habitats on-Site. Units may be generated through specific ecologically targeted habitat creation, such as wildflower grassland, and standard amenity habitats, such as amenity grassland and ornamental shrub. Woodland buffering could contribute to this process.	The creation of grassland and scrub which will be of benefit to local wildlife is proposed.	Landscape Masterplan dwg. DR-9254-01 rev. Rev B (Brooks Landscape, July 2026).
then **Offset**	If a 10% Net Gain cannot be achieved on-Site, any remaining deficit will need to be compensated for off-Site.	A gain well in excess of 10% is achieved on-site.	N/A