

Allen Centre, Willenhall

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Contents

Sı	ummar	у	1
1	Inti	oduction	2
	1.1	Background and Objectives	2
	1.2	Objectives of the report	3
	1.3	Structure of the Report	3
	1.4	The Author	3
2	Leg	islation and Policy Background	4
	2.1	National Planning Policy Framework	4
	2.2	The Environment Act (2021)	4
	2.3	Local Policy	4
3	Me	thods	7
	3.1	Baseline Habitat Assessment	7
	3.2	The Mitigation Hierarchy	7
	3.3	Biodiversity Metric Calculation	7
	3.4	Limitations	8
4	Pro	posed Development	10
5	Bas	eline Biodiversity Unit Assessment	11
	5.1	On-site Baseline	. 11
	5.2	Off-site Baseline – Allens Rough	. 13
	5.3	Off-site baseline – Planting Area 1	. 13
	5.4	Off-site baseline – Planting Area 2	. 14
	5.5	Off-site baseline – Existing Woodland	. 14
	5.6	Important Ecological Features	. 15
	5.7	Habitat Baseline Assessment	16



	5.8	Trading Rules	19
6	Pro	posed Biodiversity Unit Assessment	21
	6.1	Impacts of the Proposed Development	21
	6.2	On-site Habitats	21
	6.1	Off-site Habitats	21
	6.2	Summary of Habitat Changes	24
7	BN	G Good Practice Principles for Development	26
	7.1	Consideration of the Mitigation Hierarchy	27
8	Cor	nclusion	28
9	Ref	erence	29
ΑĮ	ppendi	x 1: Proposed Development	I
ΑĮ	ppendi	x 2: Allens Rough Location Plan	II
ΑĮ	ppendi	x 3: Location Plan of other off-site Areas	III
ΑĮ	ppendi	x 4: Condition Assessment Tables	IV
ΑĮ	ppendi	x 5: Baseline Habitat MapsX	⟨ΧΙV
٨٠	nnendi	v 6. Photographs	XX\/



Summary

ADAS was commissioned by Walsall Council to produce a Biodiversity Net Gain (BNG) assessment of The Allens Centre, Hilton Road, Willenhall, WV12 5XB (OS Grid Ref. SJ 97361 02181). The proposed plans involve a new residential development with the potential to provide up to 59 units in the form of terraced houses and apartment blocks.

This report has been prepared to initially assess the biodiversity unit gains or losses arising from the proposed scheme using the Defra Biodiversity Metric 4.0 and identify whether further measures are required. Landscape plans for the proposed development are not available and this assessment has been carried out on the assumption that all habitats on the site will be lost and that off-site areas will be enhanced in order to compensate for the habitat loss.

If these plans are followed, then the proposed development will have a gain of 2.82 units which is a 47.87% net gain. The baseline for offsite areas is 11.48 habitat units which increases to 20.21 units after enhancement of existing habitats and creation of new habitats. However, the proposals do not meet the criteria for habitat trading as part of the 4.0 metric as there is a loss of urban trees. Therefore more urban trees should be planted as part of the development.

Once full landscape plans are available, this BNG assessment should be updated to reflect the final plans.



1 Introduction

1.1 Background and Objectives

This report has been commissioned by Walsall Council to inform an outline planning application for land at The Allens Centre, Wolverhampton (hereafter referred to as 'the site', grid reference: SJ 97362 02191). The proposals for the site include the construction of a new residential development.

Due to the nature of the proposed development, a Biodiversity Net Gain (BNG) assessment of the proposed works is required, as per local and national policy. Biodiversity net gain occurs in development when the project leaves the natural environment in a better state than it was prior to the project. To achieve net gain, the developer is required to ensure that wildlife habitats are created or enhanced. It requires the development to result in a demonstrable increase in habitat value to the baseline (how the site was prior to development). Biodiversity net gain should be demonstrated quantitatively.

To demonstrate biodiversity net gain, the value of the habitats are assessed using a recognized metric tool to calculate biodiversity units. The biodiversity losses or gains resulting from the development are then calculated by subtracting the baseline (pre-development) units from the post development units. The Biodiversity Metric 4.0 Calculation tool (Natural England, 2023) has been used to demonstrate biodiversity net gain in a quantitative manner.

The *Biodiversity Net Gain Good Practice Principles for Development* (CIEEM, CIRIA, IEMA, 2016) are a set of ten principles which have been produced to provide a framework that helps improve the UK's biodiversity by contributing towards strategic priorities to conserve and enhance nature while progressing with sustainable development. To demonstrate that biodiversity net gain has been achieved in a qualitative manner for a development it would need to be shown that the development meets these ten principles which have been listed below:

- Apply the mitigation hierarchy
- Avoid losing biodiversity that cannot be offset by gains elsewhere
- Be inclusive and equitable
- Address risks
- Make a measurable net gain contribution
- Achieve the best outcomes for biodiversity
- Be additional
- Create a net gain legacy
- Optimise sustainability
- Be transparent



1.2 Objectives of the report

The BNG assessment has been produced in accordance with the British Standard (BS) for Biodiversity – Code of practice for planning and development, BS42020:2013.

The objectives of this report are as follows:

- 1. To identify the planning policy context relevant to BNG matters on the site.
- 2. To describe the baseline biodiversity value of the site based on the UK Habitat condition assessment.
- 3. To evaluate the proposed biodiversity of the site based on the current proposals.
- 4. To calculate the predicted change in the biodiversity unit value of the site post development and demonstrate the potential change in biodiversity units of the proposed development in a qualitative manner.
- 5. To assess if the proposed development meets the requirements of the trading rules and demonstrate how the proposed development does meet those requirements.
- 6. To demonstrate how the proposed development meets the ten principles set out in the 'Biodiversity Net Gain Good Practice Principles for Development' and has led with the mitigation hierarchy.

1.3 Structure of the Report

The remainder of this report is structured in the following manner:

- Section 2 Planning policy context. This describes the national, county and district level planning policy relevant to biodiversity net gain matters in relation to the proposed development.
- Section 3 Methods. Describes the methods used to undertake the Biodiversity Net Gain Assessment.
- Section 4 Proposed development. This section describes the proposed development.
- Section 5 Baseline Biodiversity Unit Assessment. This section describes the biodiversity baseline information, identifies key habitats, analyses the condition of the baseline habitats, and provides the findings of the baseline biodiversity units.
- Section 6 Proposed Biodiversity Unit Assessment. This analyses the effects of the proposed development on the baseline biodiversity units identified in section 5 and details the provision of biodiversity within the proposed development. This section will also assess the proposed development against the mitigation hierarchy and ten principles.
- Section 7 Conclusion. This final part of the report summarises the overall effects on biodiversity on the site and if the proposed development can achieve a net gain in biodiversity.

1.4 The Author

This document has been prepared by Laura Stock, an ADAS Ecological Consultant. Laura is a qualifying member of Chartered Institute of Ecology and Environmental Management (CIEEM) and holds a Master's degree in ecology. ADAS is a Landscape Institute and CIEEM registered practice, and all work is prepared and reviewed internally by senior, highly experienced ecologists.



2 Legislation and Policy Background

2.1 National Planning Policy Framework

The government policy for England on biodiversity is covered under the National Planning Policy Framework (NPPF) (2021), which includes multiple mentions of the requirement for a measurable net gain (highlighted in the following extracts below):

- Para 174d: 'Planning policies and decisions should contribute to and enhance the natural and local environment by... minimising impacts on and improving net gains for biodiversity, including by establishing ecological networks that are more resilient to current and future pressures...'
- Para 179b: 'To protect and enhance biodiversity and geodiversity, plans should... promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'
- Para 180d: 'development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.'

2.2 The Environment Act (2021)

The Environment Act (2021) requires all development schemes in England to deliver a mandatory 10% biodiversity net gain to be maintained for a period of at least 30 years after the development has been completed. Schedule 14 makes provision for biodiversity gain to be a condition of planning permission in England. The concept seeks measurable improvements for biodiversity by creating or enhancing habitats in association with development. Part 6 on nature and biodiversity covers all areas of biodiversity net gain across two core sections and the supporting Schedule 14, particularly sections 9(3), 13(2), 14(2) and 15. Although the Environment Act 2021 is a part of UK law, its policies – with mandatory biodiversity net gain included – aren't expected to be fully integrated until the year 2023 as it goes through a two-year transition period. Many local planning authorities, however, are already enforcing the new NPPF in line with detailed guidance from DEFRA and Natural England and are applying a 10% biodiversity net gain requirement on each new development proposal.

2.3 Local Policy

The Black Country Core Strategy policy on environmental infrastructure states that:

Development within the Black Country will safeguard nature conservation, inside and outside its boundaries by ensuring that:



- Development is not permitted where it would harm internationally (Special Areas of Conservation), nationally (Sites of Special Scientific Interest and National Nature Reserves) or regionally (Local Nature Reserve and Sites of Importance for Nature Conservation) designated nature conservation sites;
- Locally designated nature conservation sites (Sites of Local Importance for Nature Conservation), important habitats and geological features are protected from development proposals which could negatively impact upon them;
- The movement of wildlife within the Black Country and its adjoining areas, through both linear habitats (e.g. wildlife corridors) and the wider urban matrix (e.g. stepping stone sites) is not impeded by development;
- Species which are legally protected, in decline, are rare within the Black Country or which are covered by national, regional or local Biodiversity Action Plans will not be harmed by development.
- Adequate information must be submitted with planning applications for proposals which may affect any designated site or any important habitat, species or geological feature to ensure that the likely impacts of the proposal can be fully assessed. Without this there will be a presumption against granting permission. Where, exceptionally, the strategic benefits of a development clearly outweigh the importance of a local nature conservation site, species, habitat or geological feature, damage must be minimised. Any remaining impacts, including any reduction in area, must be fully mitigated. Compensation will only be accepted in exceptional circumstances. A mitigation strategy must accompany relevant planning applications. Current designated nature conservation sites including Local Nature Reserves will be carried forward from existing Proposals Maps, subject to additions and changes arising from further studies.

 Local Authorities will look to designate additional nature conservation sites as necessary in conjunction with the Local Sites Partnership and consequently sites may receive new, or increased, protection over the Plan period. All appropriate development should positively contribute to the natural environment of the Black Country by:
- Extending nature conservation sites;
- Improving wildlife movement; and/or
- Restoring or creating habitats / geological features which actively contribute to the implementation of Biodiversity Action Plans (BAPs) and/or Geodiversity Action Plans (GAPs) at a national, regional or local level.
 - Details of how improvements (which are appropriate to the location and scale) will contribute to the natural environment, and their ongoing management for the benefit of biodiversity and



geodiversity will be expected to accompany planning applications. Local Authorities will provide additional guidance on this in Local Development Documents.



3 Methods

3.1 Baseline Habitat Assessment

This assessment was carried out as a desk-based exercise, using the results of the UK Habitat condition assessment survey of the site and off-site areas was undertaken by ADAS on 07 June 2023. As landscape plans were not available at the time of survey, the survey of the site was based off of the current proposed development plans which can be found in Appendix 1, whilst the survey of the offsite areas were based on the red line boundaries provided in Appendices 2 and 3.

3.2 The Mitigation Hierarchy

The aim of the BNG assessment is to identify, predict and evaluate potential key effects arising from the proposed development and assess them against the mitigation hierarchy. The mitigation hierarchy requires that developers first take steps to avoid and then to minimise impacts on biodiversity. Only after these steps are taken should developers look to compensate for losses that cannot be avoided. Finally, if compensation within the development footprint is not possible or does not generate the most benefits for nature conservation, the losses should be offset elsewhere. The proposals have been developed in accordance with the British Standard for 'Process for designing and implementing Biodiversity Net Gain – Specification', BS8683:2021 to reduce risk to harm of biodiversity and maximise the potential gains on the site.

3.3 Biodiversity Metric Calculation

Biodiversity metrics (units) were calculated for the site using the "Biodiversity Metric 4.0 - Calculation Tool" and guidance available on the Natural England Website in February 2022 (Natural England, 2021 and 2021b). The biodiversity metric spreadsheet is provided as an Excel file with this report.

The metric uses area and linear habitat features as a proxy measure for capturing the value and importance of biodiversity. It uses a calculation in MS Excel to allow for the importance of these features for nature: their size, ecological condition, distinctiveness and location. The metric enables assessments to be made of the baseline (pre-intervention) biodiversity value of a site in terms of 'biodiversity units' and calculates the projected post-development (post-intervention) biodiversity value. The metric can also be used to measure off-site biodiversity changes for a project or development and can be applied from the level of an individual field to, for example, an entire river catchment.

The calculator uses the following variable elements to determine biodiversity units, based on the information collected in the field:



Habitat type: The original survey was based on the UK Habitat (UKHabs) classification system (UK Habs, 2020).

Area (Hectares): The area has been measured based on the digitized habitat map using QGIS Geographical Information System (GIS). Measurements have been rounded up or down to the nearest two decimal places to achieve a minimal mapping unit (MMU) of 0.01ha. Mapping habitats at different times of year may lead to variation between where one habitat starts and another begins as there is potential overlap between habitats (the ecotone). The actual field mapping is based on both field survey and aerial imagery in order to achieve the best representation of the areas covered by each habitat identified onsite. The areas for the post development site were taken from a pdf version of the proposed development plan which can be found in Appendix 1. The areas for the offsite locations that will be used as part of the BNG were based on red line boundaries which can be found in Appendices 2 and 3.

Condition: The condition is a means to measure the quality of a habitat based on a series of physical characteristics and typical species of a particular habitat type. In order to aid the process, the Biodiversity Metric 4.0 Technical Supplement (Natural England 2023b), provides 'condition sheets.' Condition sheets provide a list of positive indicators for each habitat and dependent on how many positive indicators a particular habitat meets will equate to the relevant condition for that specific habitat. In order that this process can be followed, in relation to this calculation, the number of positive indicators that are met for each habitat type are presented in Appendix 4 for each habitat found onsite and in the offsite areas.

Strategic significance: This element is to assess the habitats on site in relation to the geographical location in which they are located. Information to determine the significance of a habitat within a specific landscape can be found in a variety of sources that include: local plans, local biodiversity and National Character Areas. The strategic significance is based on three categories which equate to a different score, which are as follows: High - 1.15; Medium - 1.1 and Low - 1.

3.4 Limitations

Measurements are based on a two-dimensional mapping and would assume the site is completely flat and therefore certain habitats may be greater in extent if they occur on a slope.

In the field the surveyor will have judged the approximate area of each of the habitat type and where appropriate use aerial imagery to assist with mapping of the habitats as accurately as possible. The Biodiversity Metric 4.0 is accurate to two decimal places; therefore, habitats are rounded up or down to the nearest whole value, with a MMU of 0.01 hectares.

Post-development calculations for BNG assessments should be based off of final agreed landscape plans. At the time of this assessment, final landscape plans were not available. As a result this assessment is limited to a feasibility study rather than a full assessment, to determine whether a 10% net gain is possible



based on current proposals. This assessment does not include prescriptive corrective measures in the event that current proposals do not achieve a 10% net gain or do not satisfy habitat trading rules. Any such measures will form part of an update assessment that should be carried out when final landscape plans are available.



4 Proposed Development

Walsall Council propose to build 35 houses and two apartment buildings to create a total of 59 dwellings and 113 parking spaces at the site. As the application is at the outline stage and final landscape plans are not available, this study has assumed that all on site habitats will be lost in order to facilitate current proposals. As a result, offsite areas will be used to enhance existing habitats or create new habitats to offset the loss at the site. The development is shown in the illustrative masterplan at Appendix 1.

This study has been based on the assumption that all habitats on site will be lost as part of the proposed development and that as a result, no mitigation within the site will be possible. Four off site areas have been proposed to be used for offsite enhancement as part of the BNG assessment. This includes the adjacent Allens Rough; two areas that are identified to be utilised as part of a local tree planting exercise (Planting Areas 1 and 2), located at SJ 96812 01810 and SJ 97057 01807, 680 m and 470 m southeast of the site respectively; and an existing area of woodland that will be enhanced at SJ 96872 01779, 560 m southeast of the site (Appendices 2 and 3).

Currently no planting plans for these areas have been produced, calculations within this assessment are based on the assumption of the creation of Mixed scrub and Urban trees of 'good' condition within these offsite areas, and that existing habitats will be enhanced from their current condition to 'good' condition. This should be updated in a final BNG assessment to be completed once final landscaping plans are available.



5 Baseline Biodiversity Unit Assessment

5.1 On-site Baseline

The baseline biodiversity units of the proposed scheme site have been calculated and are summarised below. The condition of each habitat has been assessed using BNG 4.0 condition sheets which can be found in Appendix 4. A habitat map of the site can be found in Appendix 5.

5.1.1 H3h – Mixed scrub

A common and widespread habitat that is ecologically desirable but not associated within any specific local strategy.

Immediately west of the Hilton Road entrance was an area of Mixed Scrub with dominant immature Silver Birch (*Betula pendula*) and Sycamore (*Acer pseudoplatanus*) with ground flora consisting of Common Ivy (*Hedera helix*), Wall Cotoneaster (*Cotoneaster horizontalis*), Wood Avens (*Geum urbanum*) and rare Elder (*Sambucus nigra*). A further area of scrub comprised of Alder (*Alnus glutinosa*), Silver Birch (*Betula pendula*), Butterfly Bush (*Buddleja davidii*), Bramble (*Rubus fruticosus* agg.), Common Nettle (*Urtica dioica*) and occasional willow (*Salix* sp.) was present.

5.1.2 W1g7 – Other woodland; broadleaved

A common and widespread habitat that is ecologically desirable but not associated within any specific local strategy.

The canopy included occasional semi-mature Silver Birch, Alder and willow with an understorey of occasional Common Hawthorn (*Crataegus monogyna*) and Holly (*Ilex aquifolium*), and rare Hazel (*Corylus avellana*). The ground flora included frequent Common Nettle, occasional Herb Robert (*Geranium robertianum*), Bramble and Cleavers (*Galium aparine*).

5.1.3 U (1160) – Introduced shrub

An ecologically undesirable habitat.

Two mature Cherry Laurel (*Prunus laurocerasus*) shrubs were present on the eastern boundary. Two further areas were present within a carpark and within the semi-improved grassland field on the northern boundary.

5.1.4 U1b – Developed land; sealed surface

An ecologically undesirable habitat.

Hardstanding covered 0.24 ha of the site. At the entrance to the site off Hilton Road is a slabbed pavement surrounding four carparking bays. This area had become colonised with areas of occasional Silver Birch



and Sycamore saplings, Great Willowherb (*Epilobium hirsutum*), Common Ragwort (*Jacobaea vulgaris*), Spear Thistle (*Cirsium vulgare*), Annual Meadow-grass (*Poa annua*) and Yorkshire Fog (*Holcus lanatus*).

A hardstanding path ran west to a second carparking area on the northern boundary.

The largest area of this habitat was present to the south of the site in the form of a carpark which has undergone colonisation by surrounding grassland and moss species.

5.1.5 G4 – Modified grassland

A common and widespread habitat of low ecological importance and therefore is not associated within any specific local strategy.

The grassland was dominated by Perennial Rye-grass (*Lolium perenne*) with abundant Yorkshire Fog, False Oat-grass (*Arrhenatherum elatius*) and Common Bent (*Agrostis capillaris*) with occasional Common Ragwort, Creeping Buttercup (*Ranunculus repens*), Broadleaved Dock (*Rumex obtusifolius*) and Ribwort Plantain (*Plantago lanceolata*) with rare Soft Rush (*Juncus effusus*) and Wood Avens.

A smaller area to the northeast of the site underneath an area of scattered trees was dominated by Yorkshire Fog with abundant Common Bent, meadow-grass (*Poa* sp.) and Timothy (*Phleum pratense*), occasional Pedunculate Oak (*Quercus robur*) saplings, Ribwort Plantain, vetch (*Vicia* sp.), Common Ragwort and Broadleaved Dock.

5.1.6 U (11) – Urban tree

A common and widespread habitat of low ecological importance and therefore is not associated within any specific local strategy.

Scattered trees were present frequently across the site and included both immature and semi-mature trees. To the east of the site semi-mature scattered trees were present above an area of neutral grassland; Pedunculate Oak, Swedish Whitebeam (*Sorbus intermedia*), Wild Cherry and Field Maple (*Acer campestre*).

Semi-mature Lombardy Poplar (*Populus nigra 'Italica'*) trees were present in the northeast of the site and further immature scattered Common Hawthorn trees were present on the eastern boundary.

Immature willow trees were present around the central mosaic of grassland, scrub and hardstanding and a line of willow trees was present along an internal fence line atop semi-improved grassland.

Scattered Alder, Silver Birch and Field Maple were present along the edge of the southern carpark.



5.2 Off-site Baseline – Allens Rough

A habitat map of the off-site areas can be found in Appendix 5.

5.2.1 W1g7 – Other woodland; broadleaved

A common and widespread habitat that is ecologically desirable but not associated with any specific local strategy.

The woodland (Photograph 3) was dominated by Pedunculate Oak with abundant Silver Birch, frequent Sycamore, Holly, occasional Wild Cherry (*Prunus avium*), Elder (*Sambucus nigra*) and rare Rowan (*Sorbus aucuparia*). The understorey was dominated by Bramble.

5.2.2 G4 - Modified grassland

A common and widespread habitat of low ecological importance and therefore is not associated within any specific local strategy.

The grassland (Photograph 1) was dominated by Perennial Ryegrass with abundant Common Bent, frequent Silver Birch saplings, Cock's-foot (*Dactylis glomerata*), occasional Annual Meadow Grass (*Poa annua*), Common Vetch (*Vicia sativa*), Ribwort Plantain (*Plantago lanceolata*) and Meadow Buttercup (*Ranunculus acris*).

5.2.3 H3d - Bramble scrub

A common and widespread habitat of low ecological importance and therefore is not associated within any specific local strategy.

There were several areas of Bramble scrub (Photograph 2) with no other species.

5.3 Off-site baseline – Planting Area 1

5.3.1 G4 – Modified grassland

A common and widespread habitat of low ecological importance and therefore is not associated within any specific local strategy.

The grassland (Photograph 4) was regularly mown very short and was used recreationally with a lot of footfall. It was dominated by Perennial Ryegrass with frequent Creeping Buttercup (*Ranunculus repens*), White Clover (*Trifolium repens*), Common Daisy (*Bellis perennis*), occasional Dandelion (*Taraxacum officinale*) and Ribwort Plantain.



5.4 Off-site baseline – Planting Area 2

5.4.1 G4 – Modified grassland (11)

A common and widespread habitat of low ecological importance and therefore is not associated within any specific local strategy.

The grassland (Photograph 5) was regularly mown very short and was used recreationally with a lot of footfall. It was dominated by Perennial Ryegrass with abundant Common Bent, Daisy, frequent Dandelion, Creeping Buttercup, occasional Spear Thistle and rare Broadleaved Dock.

There were 2 lines of sapling trees quite spaced out through the area. They comprised of Rowan and Silver Birch.

5.5 Off-site baseline – Existing Woodland

5.5.1 W1g7 – Other woodland; broadleaved

Although common and widespread, this habitat is ecologically desirable and this particular area has been targeted by the Local Authority as a habitat of interest for which enhancement would be desired.

The majority of this area was dominated by woodland (Photograph 7). The canopy was dominated by willow but also included rare Common Hawthorn, Pedunculate Oak, Sycamore, cherry (*Prunus* sp.) and Rowan. All the trees appeared to be the same age and varied between 4 and 8 m tall. The ground flora of the woodland comprised a mixture of herbs and grasses including abundant Bramble, and Common Nettle, frequent meadow-grass species and Cleavers, occasional False Oat-grass, Perennial Rye-gras, Yorkshire Fog and Cock's-foot, and rare Creeping Buttercup and Curled Dock (*Rumex crispus*).

The woodland did not appear to be subject to any form of management, but a path through the woodland was present and there was evidence of disturbance by humans within the woodland.

5.5.2 G3c – Other neutral grassland

Several areas of other neutral grassland were present across the area (Photograph 6).

The first of these comprised an area of unmanaged grassland in the northeast corner of this area with a sward of height of c. 1 m. Vegetation comprised abundant False Oat-grass, Cock's-foot, Common Nettle and willowherb (*Epilobium* sp.), frequent Yorkshire Fog, Perennial Rye-grass Creeping Thistle (*Cirsium arvense*) and Cow Parsley (*Anthriscus sylvestris*), occasional meadow-grass, fescue (*Festuca* sp.), Yarrow (*Achillea millefolium*), Curled Dock and Common Ragwort, and rare Meadow Buttercup and Cleavers.

A second area of unmanaged grassland was present in the southeast corner of this area. This area was similar in condition to the first, showing no signs of management and with a sward height of c. 1 m. Vegetation included dominant False Oat-grass, locally dominant Perennial Rye-grass and willowherb,



frequent Yorkshire Fog, occasional Common Hogweed (*Heracleum sphondylium*), rare Red Fescue (*Festuca rubra*) and vetch, and a single Pedunculate Oak sapling.

The final area of grassland was present within a clearing within the woodland. Again this area appeared unmanaged with a sward height of c. 0.75m but comprised a mixture of grasses and woody species including locally dominant Bramble, abundant Yorkshire Fog and False Oat-grass, frequent Perennial Ryegrass, occasional Cleavers and vetch, and rare Curled Dock, Creeping Buttercup and Meadow Vetchling (*Lathyrus pratensis*).

5.5.3 G3 – Neutral grassland (16)

A common and widespread habitat of low ecological importance and therefore is not associated within any specific local strategy.

There were several areas of neutral grassland across the woodland area dominated by tall herbs (secondary code 16). The first of these areas sat between the area of other neutral grassland in the northeast corner and the woodland. This appeared unmanaged with vegetation c. 1 m high comprising dominant Common Nettle, locally dominant Great Willowherb (*Epilobium hirsutum*), abundant Creeping Thistle and Cow Parsley, locally abundant False Oat-grass, frequent Yorkshire Fog and Cock's-foot, and rarely occurring Meadow Buttercup, Cleavers and Yarrow.

A second area of unmanaged tall herbs c. 1-2 m tall was present comprising dominant Common Nettle, locally dominant rose, abundant Bramble, locally abundant Cock's-foot and Common Ragwort, frequent Cow Parsley, occasional Spear Thistle, meadow-grass and Perennial Rye-grass, and rare False Oat-grass, barley, Great Willowherb and Celery-leaved Buttercup (*Ranunculus sceleratus*).

A third area of tall herb was present directly west of the woodland, c. 1 m tall. This comprised dominant Greater Willowherb, locally dominant Perennial Rye-grass, abundant Bramble, frequent Cleavers, Yorkshire Fog and False oat-grass, and occasional vetch.

5.5.4 G4 – Modified grassland

Three areas of modified grassland (Photograph 8) were present within the woodland area, all of which were identical comprising heavily mown lawns c. 5 cm in height on the southeast and southwest boundaries of the woodland. Species comprised dominant perennial Rye-grass, and rare meadow-grass, Cock's-foot, Cleavers, Common Nettle and daisy (*Bellis* sp.).

5.6 Important Ecological Features

No designated sites are being affected by the proposed development.



5.7 Habitat Baseline Assessment

The condition of each habitat has been assessed against the relevant positive indicators. Summaries of the habitat units for each baseline habitat are provided in Tables 1 and 2 below. A full breakdown of the condition assessments is presented in Appendix 4.

There were no linear habitats either on or off-site.

For strategic significance, the following has been considered the most appropriate for each habitat:

- G4 Modified grassland A common and widespread habitat of low ecological importance and therefore is not associated within any specific local strategy.
- W1g7 Other woodland; broadleaved Although common and widespread, this habitat is ecologically desirable and this particular area has been targeted by the Local Authority as a habitat of interest for which enhancement would be desired.
- H3h Mixed scrub A common and widespread habitat that is ecologically desirable but not associated within any specific local strategy.
- G3c Other neutral grassland Not mentioned in local strategy.
- G3 Neutral grassland Not mentioned in local strategy.
- U (1160) Introduced shrubs A common and widespread habitat of low ecological importance and therefore is not associated within any specific local strategy.
- U1b Urban Developed land; sealed surface Not associated within any local strategy in terms of ecology.
- U (11) Urban trees Not mentioned in local strategy.

Table 1: Baseline assessment – on-site area habitats

Habitat type	Area (hectares)	Condition	Strategic significance	Total habitat units
Mixed scrub (1)	0.0645	Moderate	Area/compensation not in local strategy/no local strategy.	0.52
Broadleaved woodland (2)	0.0696	Poor	Location ecologically desirable but not in local strategy.	0.31
Introduced shrub (3)	0.0011	N/A	Area/compensation not in local strategy/no local strategy.	0
Developed land – sealed surface (4)	0.24	N/A	Area/compensation not in local strategy/no local strategy.	0



Habitat type	Area (hectares)	Condition	Strategic significance	Total habitat units
Modified grassland (5)	0.5572	Poor	Area/compensation not in local strategy/no local strategy.	2.23
Urban tree (6)	0.1	Moderate	Area/compensation not in local strategy/no local strategy.	0.80
Mixed scrub (7)	0.1727	Moderate	Area/compensation not in local strategy/no local strategy.	1.38
Modified grassland (11)	0.0108	Poor	Area/compensation not in local strategy/no local strategy.	0.02
Mixed scrub (8)	0.0339	Poor	Area/compensation not in local strategy/no local strategy.	0.27
Modified grassland (12)	0.0372	Poor	Area/compensation not in local strategy/no local strategy.	0.07
Modified grassland (13)	0.1042	Poor	Area/compensation not in local strategy/no local strategy.	0.21
Bramble scrub (14)	0.0116	N/A	Area/compensation not in local strategy/no local strategy.	0.05
Bramble scrub (15)	0.0111	N/A	Area/compensation not in local strategy/no local strategy.	0.04
Total Habitat Units		-	-	5.90

Table 2: Baseline assessment – off-site area habitats

Area reference	Habitat type	Area (hectares)	Condition	Strategic significance	Total habitat units
Planting Area 1 (1)	Modified grassland	0.19	Poor	Area/compensation not in local strategy/no local strategy.	0.38
Planting Area 2 (2)	Modified grassland	0.07	Poor	Area/compensation not in local	0.14



Area reference	Habitat type	Area (hectares)	Condition	Strategic significance	Total habitat units
				strategy/no local strategy.	
Allen's Rough (3)	Modified grassland	0.26	Poor	Area/compensation not in local strategy/no local strategy.	0.52
Allen's Rough (4)	Bramble scrub	0.0054	Condition Assessment N/A	Area/compensation not in local strategy/no local strategy.	0.02
Allen's Rough (16)	Bramble scrub	0.0496	Condition Assessment N/A	Area/compensation not in local strategy/no local strategy.	0.20
Allen's Roug (17)	Bramble scrub	0.012	Condition Assessment N/A	Area/compensation not in local strategy/no local strategy.	0.05
Allen's Rough (5)	Other woodland; broadleaved	0.213	Poor	Location ecologically desirable but not in local strategy.	0.94
Allen's Rough (18)	Other woodland; broadleaved	0.2953	Poor	Location ecologically desirable but not in local strategy.	1.18
Allen's Rough (19)	Other woodland; broadleaved	0.0317	Poor	Location ecologically desirable but not in local strategy.	0.13
Existing Woodland (6)	Other woodland; broadleaved	0.8	Moderate	Location ecologically desirable but not in local strategy.	7.04
Existing Woodland (7)	Modified grassland	0.0044	Poor	Area/compensation not in local strategy/no local strategy.	0.01
Existing Woodland (9)	Modified grassland	0.0165	Poor	Area/compensation not in local strategy/no local strategy.	0.03
Existing Woodland (10)	Modified grassland	0.0033	Poor	Area/compensation not in local	0.01



Area reference	Habitat type	Area (hectares)	Condition	Strategic significance	Total habitat units
				strategy/no local strategy.	
Existing Woodland (8)	Other neutral grassland	0.036	Poor	Area/compensation not in local strategy/no local strategy.	0.14
Existing Woodland (11)	Other neutral grassland	0.0242	Poor	Area/compensation not in local strategy/no local strategy.	0.10
Existing Woodland (12)	Other neutral grassland	0.0355	Poor	Area/compensation not in local strategy/no local strategy.	0.14
Existing Woodland (13)	Other neutral grassland	0.0944	Poor	Area/compensation not in local strategy/no local strategy.	0.38
Existing Woodland (14)	Other neutral grassland	0.0050	Poor	Area/compensation not in local strategy/no local strategy.	0.02
Existing Woodland (15)	Other neutral grassland	0.0143	Poor	Area/compensation not in local strategy/no local strategy.	0.06
	Total Habitat Units				11.48

5.8 Trading Rules

For habitat trading purposes the following is required for each baseline habitat:

- Urban tree: Medium distinctiveness. Same broad habitat or higher distinctiveness required.
- Modified grassland: Low distinctiveness. Replace with same distinctiveness or better.
- Other neutral grassland: Medium distinctiveness. Same broad habitat or a higher distinctiveness habitat required.
- Other woodland; broadleaved Medium distinctiveness. Same broad habitat or a higher distinctiveness habitat required.



- Mixed scrub: Medium Distinctiveness. Same broad habitat or a higher distinctiveness habitat required.
- Introduced shrub: Low distinctiveness. Same distinctiveness or better habitat required.



6 Proposed Biodiversity Unit Assessment

6.1 Impacts of the Proposed Development

All of the habitats on the site will be lost to the proposed development which includes:

- 0.24 ha of mixed scrub
- 0.75 ha of modified grassland
- 0.058 ha of other woodland; broadleaved
- 0.02 ha of introduced shrub
- 0.24 ha of developed land
- 0.1 ha of urban trees

There are several off-site areas that will be used to compensate for the habitat loss. Allen's Rough is comprised of 0.26 ha of modified grassland, 0.067 ha of scrub and 0.54 ha of broadleaved woodland and these will all be enhanced.

There are two areas of modified grassland, with the second area also having a few urban trees. Planting Area 1 is 0.19 ha and Planting Area 2 is 0.07 ha. Both of these will be used to create a new habitat of mixed scrub and urban trees with the aim of good condition.

An area of existing woodland comprised of 0.0242 ha of modified grassland, 0.2094 ha of neutral grassland and tall herbs, and 0.8 ha of broadleaved woodland will also be enhanced. The grassland and tall herb will be enhanced from poor to good condition, and the woodland from moderate to good.

6.2 On-site Habitats

No habitats are being created at the site.

6.1 Off-site Habitats

The new off-site habitats are based on the outlines in Appendices 2 and 3 and are summarised in Table 3

Table 3: Summary of off-site habitat creation and enhancement

Area Reference	Habitat type	Area (hectares)	Condition	Ecological connectivity	Strategic significance	Total habitat units
			Creatio	n		
Planting Area 1	Mixed scrub	0.19	Good	Good	Location ecologically desirable but not in local strategy.	1.76



Area Reference	Habitat type	Area (hectares)	Condition	Ecological connectivity	Strategic significance	Total habitat units
Planting Area 2	Mixed scrub	0.07	Good	Poor	Location ecologically desirable but not in local strategy.	0.65
Planting Area 2	Urban tree	0.07	Good	Poor	Area/compensat ion not in local strategy/no local strategy.	0.27
	Total Creation Units					2.68
			Enhancen	nent		
Allen's Rough 5	Broadleaved woodland	0.213	Good	Poor	Location ecologically desirable but not in local strategy.	1.86
Allen's Rough 18	Broadleaved woodland	0.2953	Good	Poor	Location ecologically desirable but not in local strategy.	2.57
Allen's Rough 19	Broadleaved woodland	0.0317	Good	Poor	Location ecologically desirable but not in local strategy.	0.28
Allen's Rough	Modified grassland	0.26	Good	Poor	Area/compensat ion not in local strategy/no local strategy.	1.13
Existing Woodland 6	Broadleaved woodland	0.8	Good	Good	Location ecologically desirable but not in local strategy.	9.50
Existing Woodland	Modified grassland	0.0044	Good	Good	Area/compensat ion not in local strategy/no local strategy.	0.02



Area Reference	Habitat type	Area (hectares)	Condition	Ecological connectivity	Strategic significance	Total habitat units
Existing Woodland 9	Modified grassland	0.0165	Good	Good	Area/compensat ion not in local strategy/no local strategy.	0.07
Existing Woodland 10	Modified grassland	0.0033	Good	Good	Area/compensat ion not in local strategy/no local strategy.	0.01
Existing Woodland 8	Neutral grassland	0.036	Good	Good	Area/compensat ion not in local strategy/no local strategy.	0.31
Existing Woodland	Neutral grassland	0.0242	Good	Good	Area/compensat ion not in local strategy/no local strategy.	0.21
Existing Woodland	Neutral grassland	0.0355	Good	Good	Area/compensat ion not in local strategy/no local strategy.	0.31
Existing Woodland 13	Neutral grassland	0.0944	Good	Good	Area/compensat ion not in local strategy/no local strategy.	0.82
Existing Woodland 14	Neutral grassland	0.0050	Good	Good	Area/compensat ion not in local strategy/no local strategy.	0.04
Existing Woodland 15	Neutral grassland	0.0143	Good	Good	Area/compensat ion not in local strategy/no local strategy.	0.12
	Total Enhanceme nt Units					17.25
	Total Habitat Units					20.21



6.2 Summary of Habitat Changes

The total biodiversity value of the onsite habitats prior to development was 5.90 units. None of the habitats will be retained during the construction phase of the development.

Two offsite areas of 0.19 and 0.07 hectares will be secured to create new mixed scrub habitats. The baseline biodiversity of the sites were 0.38 and 0.14 habitat units. In Planting Area 1 mixed scrub will be created to deliver 1.75 habitat units and in Planting Area 2 mixed scrub and urban trees will be planted to deliver 2.67 habitat units.

At Allen's Rough and the Existing Woodland, the existing habitats, including broadleaved woodland and modified grassland will be enhanced to provide a further 17.27 habitat units.

Under the current scheme design, post-development habitats and their associated target conditions will achieve a total net change of 2.82 biodiversity units, which represents a 47.87% net gain.

Although the above would result in achieving in excess of a 10% net gain for the proposed development, the current proposals do not satisfy the 4.0 metric trading rules. This is because of a loss of 0.8 habitat units of urban trees and only a 0.27 habitat unit gain. To satisfy the trading rules additional urban trees would need to be planted as part of the proposed development. Additional tree planting incorporated into landscape plans at the detailed planning stage could address this.

A screenshot of the headline results within the biodiversity metric is shown in the Table 4 below.



Table 4: Summary of Biodiversity Metric 4.0 results

Headline Results		Errors fagged h investigate f			
		Habitat units	5.90		
On-s	site baseline	Hedgerow units	0.00		
		Watercourse units	0.00		
O		Habitat units	0.00		
On-site p	post-intervention resention, creation & enhancement)	Hedgerow units	0.00		
(minusing mease in	esenten, cristaton er Minanciataen)	Watercourse units	0.00		
O		Habitat units	-5.90	-100.00%	On-atio mili quin talissa than tanget ant A
	te net change nis & percensge)	Hedgerow units	0.00	0.00%	
(u	in a becreainde)	Watercourse units	0.00	0.00%	
0.00	-it11i	Habitat units	11.48		
OII-S	site baseline	Hedgerow units Watercourse units	0.00		
Off-cita r	post-intervention	Habitat units	20.21		
	resention, creation & enhancement)	Hedgerow units	0.00		
		Watercourse units	0.00		,
Off-si	te net change	Habitat units	8.73	76.02%	
	nin & percenage)	Hedgerow units Watercourse units	0.00	0.00%	
	ed net unit change e habiter serenton, creation & enhancement	Habitat units Hedgerow units Watercourse units	2.82 0.00 0.00		
C	Marking (CDA D) and an alice	Habitat units	0.00		
Spatial risk mul	ltiplier (SRM) deductions	Hedgerow units Watercourse units	0.00		
			000		
	EINIXI DECLII		0.00		
	FINALRESUL		0.00		
T-1-1-			2.82		
	net unit change	Habitat units Heckerow units			
		Habitat units Heckerow units	2.82		
(Including all on-size & off-size	net unit change to habiter secontion, ciscation & embancement	Habitat units Hadgerow units	2.82		
(Including all on-size & off-size	net unit change biblior stomon, castim & etherconcer net % change	Habitat units Hadjarow units Watercourse units Hadjarow units Hadjarow units	2.82 0.00 0.00		
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(Including all cossins & eff-sin Total is (Including all cossins & eff-sin Trading	net unit change behing stemme, coatin & onlandement net % change behing stemme, coatin & onlandement	Hishitat units Hedgerow units Watercourse units Hatitat units Hedgerow units Watercourse units No - Check Trading	2.82 0.00 0.00 47.87% 0.00%		
(Including all cossins & eff-sin Total is (Including all cossins & eff-sin Trading	net unit change o babier strenden, esseren & enbancement net % change o babier strenden, esseren & enbancement y rules satisfied? Target Baseline U	Habitat units Hadjerow units Watercourse units Habitat units Habitat units Habitat units Watercourse units No - Check Trading	2.82 0.00 0.00 47.87% 0.00% 0.00%		
(including all on-site & eff-site Total is (including all on-site & eff-site Trading	net unit change to behave selection, casation & embancement net % change to behave selection, casation & embancement prules satisfied? Common process (interfaces the behave and	Habitat units Hedgerow units Watercourse units Habitat units Hedgerow units Watercourse units No - Check Trading	2.82 0.00 0.00 47.87% 0.00% 0.00%		l requirement not ar auspeanns √ I requirement not ar auspeanns √



7 BNG Good Practice Principles for Development

Table 5 below outlines the justification of how each of the BNG Principles has been applied as part of the BNG assessment.

Table 5: Good practice principles and their consideration within the scheme

Good Practice Principle	Site Considerations
Apply the mitigation hierarchy	Refer to Section 7.1 for more information
Avoid losing biodiversity that cannot be offset elsewhere	The project will not result in losses to any statutory designated sites, ancient woodland or other irreplaceable habitat.
Compensate / Offset	The habitat loss at the site will be compensated by habitat creation and enhancement off site.
Be inclusive and equitable	Although current proposals assume loss of all habitats off site, proposed enhancements of the adjacent and nearby off-site areas will provide amenity areas for residents whilst benefitting wildlife within the immediate area.
Address risk	Proposed habitat enhancements have been selected that will be practical to achieve on a site of this size. A management plan should be produced at the detailed design stage to ensure targets for the site are realised.
Make a measurable net gain contribution	The proposed plan results in a biodiversity net gain.
Be additional	The site is not under any existing obligations to create or manage habitat, therefore the proposals for habitat creation and enhancement provided are additional to what would be expected to happen without the development.
Create a net gain legacy	A suitable management plan should be produced at the detailed design stage to provide a long-term (minimum 30-year) plan for management of the habitats off site.
Optimise sustainability	By achieving net gain through recommendations suitable to the sites and practical in the long term, ecological enhancements off site will be sustainable.
Be transparent	The Local Authority will be provided with the BNG Assessment report, the Defra calculation sheet and supporting drawings used in the calculations. All biodiversity metric choices have been fully explained and justified.



7.1 Consideration of the Mitigation Hierarchy

Table 6 below outlines how the mitigation hierarchy is being considered.

Table 6: Mitigation hierarchy

Hierarchy Step	Site Considerations
Avoid	The proposed development avoids the loss of irreplaceable habitats.
Minimise	In absence of final agreed landscape plans, habitat loss at the site can't be avoided but works will be carried out at certain times to reduce the impact to wildlife.
Compensate / Offset	Off-site areas will be used to create and enhance habitat to compensate for the loss of habitats at the site.



8 Conclusion

The proposed development at the Allen Centre will result in a loss of modified grassland, neutral grassland, mixed scrub, urban trees and introduced scrub.

Two off site areas of modified grassland, neutral grassland, broadleaved woodland and scrub will be enhanced and a further two off site areas of modified grassland and urban trees will have mixed scrub habitat created. This will provide compensation for the habitats lost on site with an overall net gain of 20.80%. The off-site areas had a baseline of 11.61 habitat units which will increase to 20.21 habitat units if the proposed plan is followed.

However, the proposed development does not satisfy the trading rules due to a loss of o.8 habitat units of urban trees and only a 0.27 habitat gain. In order to meet the trading rules more urban trees need to be planted as part of the proposed development. This could be incorporated into landscape plans at the detailed planning stage.



9 Reference

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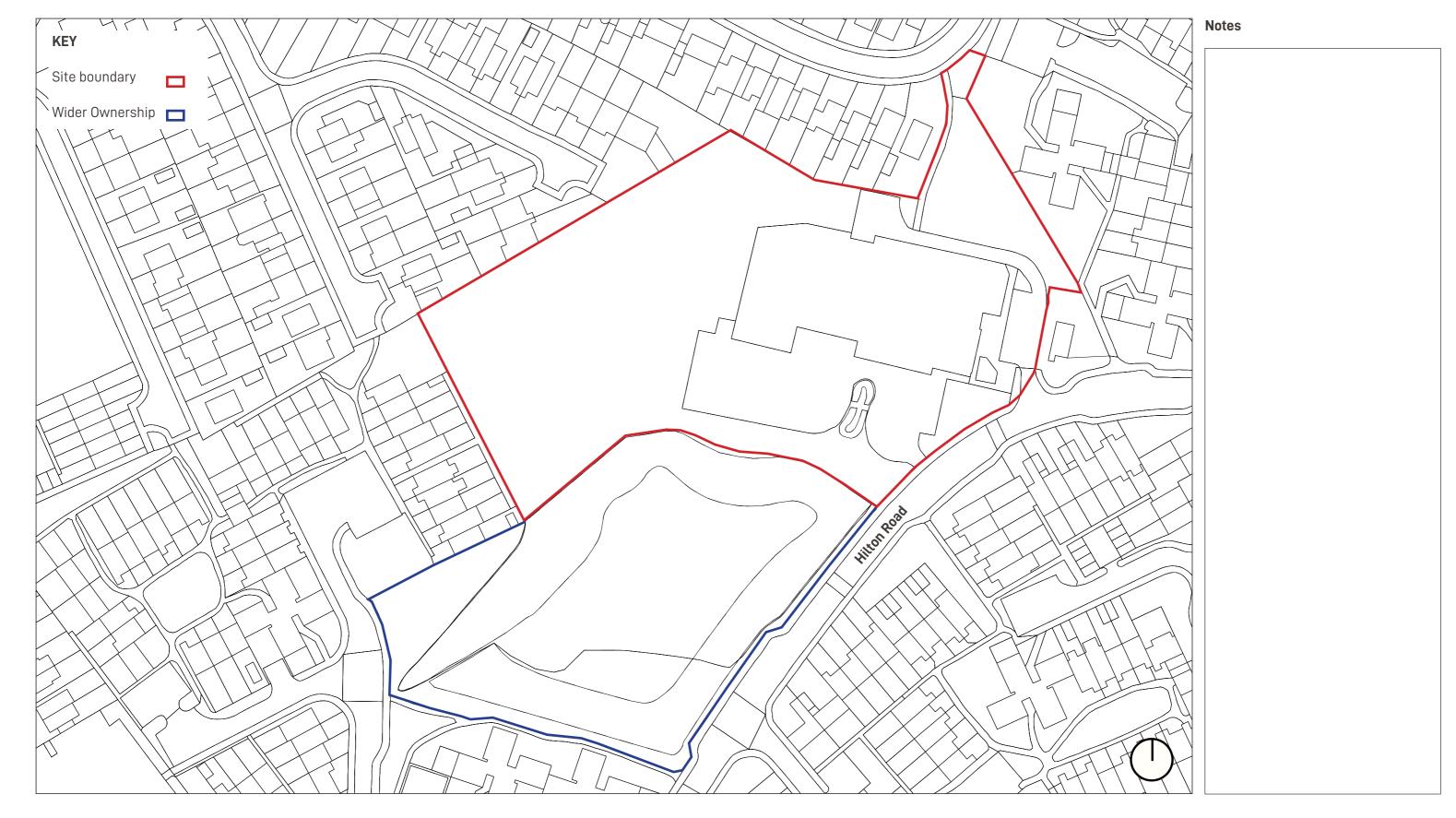


Appendix 1: Proposed Development

See following page.



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Site Plan



ProjectAllen's CentreClientWalsall CouncilDate13.01.23No.SK01Rev.-AuthorRCJScale1:1000 @ A3

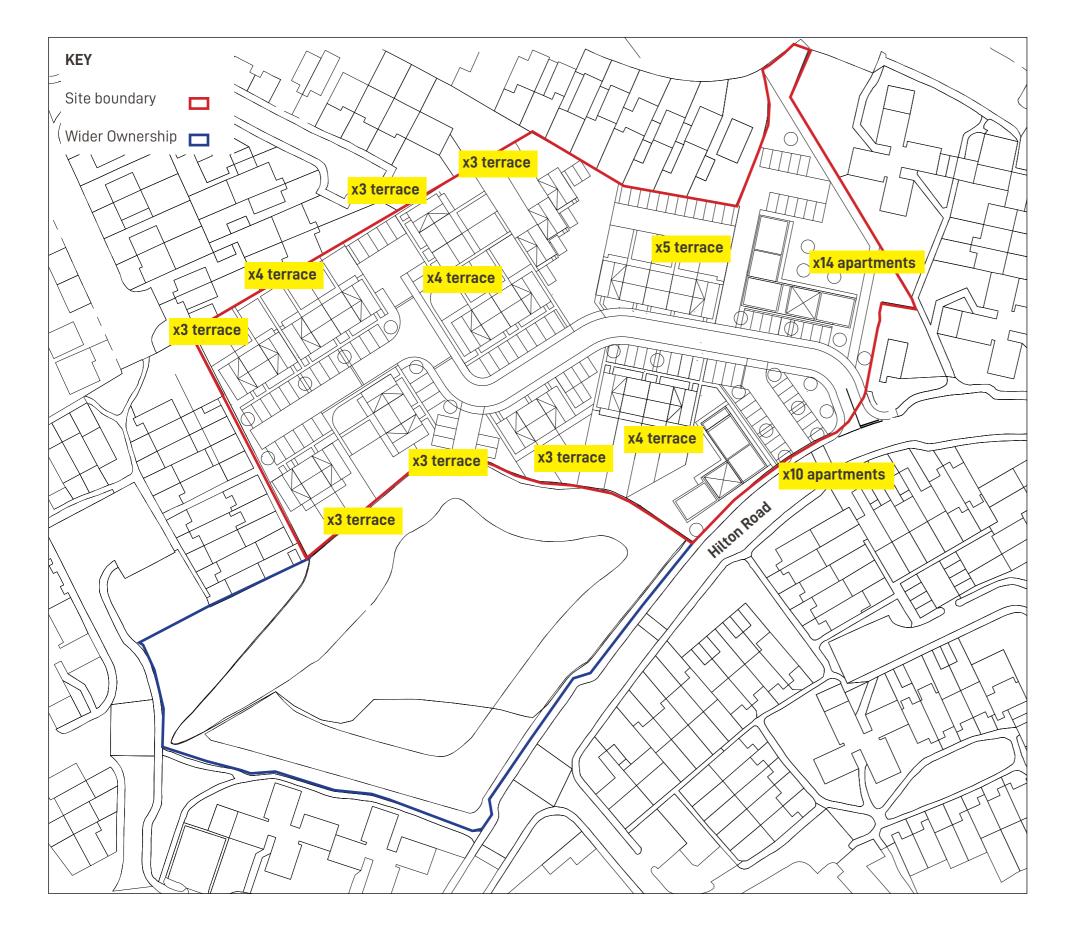
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Appendix 2: Allens Rough Location Plan

See following page. Location of Allens Rough outlined in blue.



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Notes

Numbers and mix

59 dwellings in total

17x 2 bed houses 18x 3 bed houses

15x 1 bed apartments 9x 2 bed apartments

Total:

15x 1 bed (22%) 30x 2 bed (47%) 18x 3 bed (31%)

Parking

1x space per 1 bed 2x space per 2+ bed 7 visitor spaces

113 parking spaces in total



Illustrative masterplan

Project Allen's Centre
Client Walsall Council
Date 19.01.23
No. SK04 Rev.
Author RCJ Scale

Rev. -**Scale** 1:1000 @ A3

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Appendix 3: Location Plan of other off-site Areas

See following page.



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Appendix 3

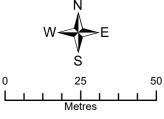
Allens Centre

Location Plan

Existing Woodland

Planting Area 1

Drawn by Tom Burke 06/07/2023, Verified by Joseph Dyson 06/07/2023



1:1,250 at A3 size

Background imagery: Maxar, Microsoft



Appendix 4: Condition Assessment Tables

On-site Habitats Area Habitats

	Other Woodland, Broadleaved (2)					
	Indicator	Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	
1	Age distribution of trees ¹	Three age classes present	Two age classes present	One age class present	1	
2	and feral browsing damage evident in woodland ²		Evidence of significant browsing pressure is present in 40% or less of whole woodland	Evidence of significant browsing pressure is present in 40% or more of whole woodland	3	
3	Invasive plant species ³	No invasive species present in woodland	Rhododendron or laurel not present, other invasive species < 10% cover	Rhododendron or laurel present, or other invasive species > 10% cover	3	
4	Number of native tree species	Five or more native tree or shrub species found across woodland parcel	Three to four native tree or shrub species found across woodland parcel	None to two native tree or shrub species across woodland parcel	3	
5	Cover of native tree and shrub species	>80% of canopy trees and >80% of understory shrubs are native	50-80% of canopy trees and 50-80% of understory shrubs are native	< 50% of canopy trees and <50% of understory shrubs are native	3	
6	Open space within woodland ⁴	10 – 20% of woodland has areas of temporary open space, unless woodland is <10ha in which case lower threshold of 10% does not apply	21- 40% of woodland has areas of temporary open space	More than 40% of woodland has areas of temporary open space	1	
7	Woodland regeneration ⁵	All three classes present in woodland; trees 4-7cm dbh, saplings and seedlings or advanced coppice regrowth	One or two classes only present in woodland	No classes or coppice regrowth present in woodland	1	
8	Tree health	Tree mortality less than 10%, no pests or diseases and no crown dieback	11% to 25% mortality and/or crown dieback or low risk pest or disease present	Greater than 25% tree mortality and or any high risk pest or disease present	3	

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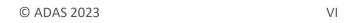


9	Vegetation and ground flora	Ancient woodland flora indicators present	Recognisable NVC plant community present	No recognisable NVC community	1
10	Woodland vertical structure ⁶	1	Two storeys across all survey plots	One or less storey across all survey plots	1
11	Veteran trees ⁷	1	One veteran tree per hectare	No veteran trees present in woodland	1
12	Amount of deadwood	1	Between 25% and 50% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps	survey plots within the woodland parcel have standing deadwood,	1
Woodland disturbance ⁸		Less than 1 hectare in total of nutrient enrichment across woodland area and/or less than 20% of woodland area has damaged ground	nutrient enrichment and/or more than 20% of	1	
Total Score					
Condition Assessment					Poor



	Grassland Condition Assessment (Low distinctiveness) (5)						
	Criteria	Y/N	Notes				
1	There must be 6-8 species per m². NB – This criterion is essential for achieving moderate or good condition.	N	Less than 6 species per m ²				
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm).	N	Mostly over 7cm.				
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. NB – patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat.	Υ	Some scattered scrub present.				
4	Physical damage is evident in less than 5% of total grassland area, examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	N	High levels of activity from walkers and dogs.				
5	Cover of bare ground between 1% and 10%, including localised areas, for example, rabbit warrens.	Υ	Bare ground is less than 10%				
6	Cover of bracken less than 20%.	Υ	No bracken present.				
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Υ	No invasive species present.				
	Condition:	ition: Poor					

	Grassland Condition Assessment (Low distinctiveness) (11)					
	Criteria	Y/N	Notes			
1	There must be 6-8 species per m². NB – This criterion is essential for achieving moderate or good condition.	N	Less than 6 species per m ²			
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm).	N	Mostly over 7cm.			
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. NB – patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat.	N	Scrub classed as separate habitat.			
4	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.	У	Damage is less than 5%.			





5	Cover of bare ground between 1% and 10%, including localised areas, for example, rabbit warrens.	У	Bare ground is less than 10%.
6	Cover of bracken less than 20%.	Υ	No bracken present.
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Υ	No invasive species present.
	Condition:		Poor

	Grassland Condition Assessment (Low distinctiveness) (12)						
	Criteria	Y/N	Notes				
1	There must be 6-8 species per m². NB – This criterion is essential for achieving moderate or good condition.	N	Less than 6 species per m ²				
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm).	N	Mostly over 7cm.				
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. NB – patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat.	N	Areas of scrub classed as separate habitat.				
4	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.	Υ	Damage is less than 5%.				
5	Cover of bare ground between 1% and 10%, including localised areas, for example, rabbit warrens.	Υ	Bare ground is less than 10%.				
6	Cover of bracken less than 20%.	Υ	No bracken present.				
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Υ	No invasive species present.				
	Condition:		Poor				

	Grassland Condition Assessment (Low distinctiveness) (13)					
	Criteria	Y/N	Notes			
1	There must be 6-8 species per m². NB – This criterion is essential for achieving moderate or good condition.	N	Less than 6 species per m ²			
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm).	N	Mosty over 7cm.			

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3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. NB – patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat.	N	No scrub present.
4	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.	Υ	Damage is less than 5%.
5	Cover of bare ground between 1% and 10%, including localised areas, for example, rabbit warrens.	Υ	Bare ground is less than 10%.
6	Cover of bracken less than 20%.	Υ	No bracken present.
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Υ	No invasive species present.
	Condition:		Poor

	Mixed Scrub Condition Assessment (1)						
	Criteria	Y/N	Notes				
1	The scrub is a good representation of the habitat type it has been identified as, based on its UKHab description (where in its natural range). The appearance and composition of the vegetation closely matches the characteristics of the specific scrub type. At least 80% of scrub is native, and there are at least three native woody species1, with no single species comprising more than 75% of the cover (except hazel Corylus avellana, common <i>juniper Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> or box <i>Buxus sempervirens</i> , which can be up to 100% cover).	N	Scrub has a lot of Buddleia and Laurel.				
2	Seedlings, saplings, young shrubs and mature (or ancient or veteran2) shrubs are all present.	Υ	Saplings and mature shrubs are present.				
3	There is an absence of invasive non-native plant species3 (as listed on Schedule 9 of WCA4) and species indicative of sub-optimal condition5 make up less than 5% of ground cover.	N	No invasive species are present.				
4	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	Υ	Grass is present at the edges.				
5	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Υ	There are several open areas.				
	Condition:		Moderate				



	Mixed Scrub Condition Assessment (7)					
	Criteria	Y/N	Notes			
1	The scrub is a good representation of the habitat type it has been identified as, based on its UKHab description (where in its natural range). The appearance and composition of the vegetation closely matches the characteristics of the specific scrub type. At least 80% of scrub is native, and there are at least three native woody species1, with no single species comprising more than 75% of the cover (except hazel	N	Scrub has a lot of Buddleia and Laurel.			
2	Corylus avellana, common juniper Juniperus communis, sea buckthorn Hippophae rhamnoides or box Buxus sempervirens, which can be up to 100% cover).					
2	Seedlings, saplings, young shrubs and mature (or ancient or veteran2) shrubs are all present.	Υ	Saplings and mature shrubs are present.			
3	There is an absence of invasive non-native plant species3 (as listed on Schedule 9 of WCA4) and species indicative of sub-optimal condition5 make up less than 5% of ground cover.	N	No invasive species are present.			
4	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	Υ	Grass is present at the edges.			
5	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Υ	There are several open areas.			
	Condition:		Moderate			

	Mixed Scrub Condition Assessment (8)						
	Criteria	Y/N	Notes				
1	The scrub is a good representation of the habitat type it has been identified as, based on its UKHab description (where in its natural range). The appearance and composition of the vegetation closely matches the characteristics of the specific scrub type. At least 80% of scrub is native, and there are at least three native woody species1, with no single species comprising more than 75% of the cover (except hazel Corylus avellana, common <i>juniper Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> or box <i>Buxus sempervirens</i> , which can be up to 100% cover).	N	Scrub has a lot of Buddleia and Laurel.				
2	Seedlings, saplings, young shrubs and mature (or ancient or veteran2) shrubs are all present.	Υ	Saplings and mature shrubs are present.				



3	There is an absence of invasive non-native plant species3 (as listed on Schedule 9 of WCA4) and species indicative of sub-optimal condition5 make up less than 5% of ground cover.	N	No invasive species are present.	
4	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	Υ	Grass is present at the edges.	
5	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Y	There are several open areas.	
	Condition:	Moderate		

	Urban Trees Condition Assessment (6)						
	Criteria	Y/N	Notes				
1	The tree is a native species (or at least 70% within the block are native species).	Υ	Trees are over 70% native.				
2	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).	Υ	There is a continuous canopy.				
3	The tree is mature (or more than 50% within the block are mature).	N	Most of the trees are young or semi mature.				
4	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.	Υ	No agricultural impacts and the trees are not regularly maintained.				
5	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	N	There is no deadwood or loose bark.				
6	More than 20% of the tree canopy area is oversailing vegetation beneath.	N	Most of the trees are over hardstanding.				
	Condition:	Moderate					



Allens Rough Area Habitats

Other Woodland, Broadleaved (5, 18 and 19) Score per Indicator Good (3 points) **Moderate (2 points)** Poor (1 point) indicator Age 1 Three age classes 1 distribution of Two age classes present One age class present present trees1 Wild, domestic significant Evidence of significant Evidence of significant No and feral browsing damage browsing pressure is browsing pressure is 2 present in 40% or more herbivore evident in present in 40% or less of woodland² whole woodland of whole woodland damage Rhododendron or laurel Rhododendron or laurel Invasive plant No invasive species present, other present, or not other 3 species³ present in woodland invasive species < 10% invasive species > 10% cover cover Five or more native Three to four native Number None to two native tree of or shrub tree or shrub species 4 native tree or shrub species across species found across found across woodland species woodland parcel woodland parcel parcel 50-80% of canopy trees > 80% of canopy < 50% of canopy trees Cover of native trees and >80% of 50-80% and 5 tree and shrub and <50% of understory understory shrubs understory shrubs are species shrubs are native are native native - 20% of 10 3 woodland has areas of temporary open 21- 40% of woodland More than 40% of Open space unless space, within 6 has areas of temporary woodland has areas of woodland is <10ha woodland4 open space temporary open space in which case lower threshold of 10% does not apply All three classes 1 present woodland; trees 4-No classes or coppice Woodland One or two classes only 7cm dbh, saplings regrowth present in regeneration⁵ present in woodland and seedlings or woodland advanced coppice regrowth Tree mortality less 11% to 25% mortality Greater than 25% tree than 10%, no pests and/or crown dieback mortality and or any 8 Tree health or diseases and no or low risk pest or high risk pest or disease crown dieback disease present present



9	Vegetation and ground flora	Ancient woodland flora indicators present	Recognisable NVC plant community present	No recognisable NVC community	1
10	Woodland vertical structure ⁶	1	Two storeys across all survey plots	One or less storey across all survey plots	1
11	Veteran trees ⁷	1	One veteran tree per hectare	No veteran trees present in woodland	1
12	Amount of deadwood	1	Between 25% and 50% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps	Less than 25% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps	1
Woodland disturbance ⁸ 2 Less than 1 hectare in total of nutrient enrichment across woodland area and/or less than 20% of woodland area has damaged ground More than 1 hectare of nutrient enrichment and/or more than 20% of woodland area has damaged ground			2		
Total Score					26
Condition Assessment					Moderate



	Grassland Condition Assessment (Low distinctiveness) (3)				
	Criteria	Y / N	Notes		
1	There must be 6-8 species per m ² .	N	Less than 6 species per m ²		
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm).	Υ	Shorter grass by the path and longer grass closer to the scrub and woodland.		
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note – patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat.	N	Bramble scrub is classed as a separate habitat.		
4	Physical damage is evident in less than 5% of total grassland area, examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	N	More than 5% damaged by high activity levels, including walking, dogs, fires, and waste being dumped.		
5	Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	N	More than 5% bare ground from high levels of people walking through the area.		
6	Cover of bracken less than 20%.	Υ	No bracken present.		
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Υ	No invasive species present.		
	Condition:		Poor		





Planting Area 1 Area Habitats

Grassland Condition Assessment (Low distinctiveness) (1) Υ/ Criteria **Notes** 6 species in total and less than 6 per Ν There must be 6-8 species per m². m^2 Sward height is varied (at least 20% of the sward is less than 7 Ν 100% of the grass is less than 7cm. cm and at least 20% is more than 7 cm). Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note – Ν No scrub present. patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat. Physical damage is evident in less than 5% of total grassland High levels of amenity use and highly area, examples of physical damage include excessive poaching, Ν damage from machinery use or storage, erosion caused by high managed. levels of access, or any other damaging management activities. Patches of bare ground from amenity Cover of bare ground between 1% and 5%, including localised Ν areas, for example, rabbit warrens. use and paths. Υ No bracken present. Cover of bracken less than 20%. There is an absence of invasive non-native species (as listed on No invasive species present. Schedule 9 of WCA, 1981). **Condition: Poor**



Planting Area 2 Area Habitats

Grassland Condition Assessment (Low distinctiveness) (1) Y/ Criteria **Notes** N 7 species in total, less than 6 per m² There must be 6-8 species per m². Sward height is varied (at least 20% of the sward is less than Ν 100% of the grass is less than 7cm. 7 cm and at least 20% is more than 7 cm). Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Ν No scrub present. Note – patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat. Physical damage is evident in less than 5% of total grassland area, examples of physical damage include excessive High levels of damage from walking Ν poaching, damage from machinery use or storage, erosion and highly managed. caused by high levels of access, or any other damaging management activities. Cover of bare ground between 1% and 5%, including localised Less than 1% bare ground areas, for example, rabbit warrens. No bracken present. Cover of bracken less than 20%. There is an absence of invasive non-native species (as listed No invasive species present. on Schedule 9 of WCA, 1981). **Condition:** Poor



Existing Woodland Area Habitats

	Grassland Condition Assessment (Me	nctiveness) (8)	
	Criteria	Y/N	Notes
1	The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type. Wildflowers, sedges, and indicator species for the specific habitat type are very clearly and easily visible throughout the sward. NB — This criterion is essential for achieving moderate condition for non-acid grassland types.	N	Species composition does not match specific grassland type.
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm)	N	100% of grassland was greater than 20cm.
3	Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	Υ	No bare ground.
4	Cover of bracken less than 20% and cover of scrub (including bramble) less than 5%.	Υ	Bracken and scrub coverage less than 5%.
5	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981). Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.	Υ	No invasive species.
6	There are greater than 9 species per metre squared. NB – This criterion is essential for achieving good condition for non-acid grassland types.	N	Less than 9 species per m ²
	Condition:		Poor

Grassland Condition Assessment (Medium distinctiveness) (11)					
Criteria	Y/N	Notes			
The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type. Wildflowers, sedges, and indicator species for the specific habitat type are very clearly and easily visible throughout the sward. NB — This criterion is essential for achieving moderate condition for non-acid grassland types.	N	Species composition does not match specific grassland type.			



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2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm)	N	100% of grassland was greater than 20cm.
3	Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	Υ	No bare ground.
4	Cover of bracken less than 20% and cover of scrub (including bramble) less than 5%.	Υ	Bracken and scrub coverage less than 5%.
5	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981). Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.	Υ	No invasive species.
6	There are greater than 9 species per metre squared. NB – This criterion is essential for achieving good condition for non-acid grassland types.	N	Less than 9 species per m ²
	Condition:	Poor	

	Grassland Condition Assessment (Medium distinctiveness) (12)				
	Criteria	Y/N	Notes		
1	The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type. Wildflowers, sedges, and indicator species for the specific habitat type are very clearly and easily visible throughout the sward. NB — This criterion is essential for achieving moderate condition for non-acid grassland types.	N	Species composition does not match specific grassland type.		
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm)	N	100% of grassland was greater than 20cm.		
3	Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	Υ	No bare ground.		
4	Cover of bracken less than 20% and cover of scrub (including bramble) less than 5%.	N	Bracken and scrub coverage greater than 20%.		
5	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981). Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other	Υ	No invasive species.		

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	Condition:		Poor
6	There are greater than 9 species per metre squared. NB – This criterion is essential for achieving good condition for non-acid grassland types.	N	Less than 9 species per m ²
	damaging management activities) accounts for less than 5% of total area.		

Grassland Condition Assessment (Medium distinctiveness) (Tall herbs) (13) Criteria Y/N Notes The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type. Wildflowers, sedges, and indicator species for the Species composition does not match Ν specific habitat type are very clearly and easily visible specific grassland type. throughout the sward. NB – This criterion is essential for achieving moderate condition for non-acid grassland types. 2 100% of grassland was greater than Sward height is varied (at least 20% of the sward is less than Ν 7 cm and at least 20% is more than 7 cm) 20cm. Cover of bare ground between 1% and 5%, including 3 No bare ground. localised areas, for example, rabbit warrens. Bracken and scrub coverage greater Cover of bracken less than 20% and cover of scrub Ν (including bramble) less than 5%. than 20%. There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981). Combined cover of species indicative of sub-optimal condition and physical damage No invasive species. (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. There are greater than 9 species per metre squared. Ν Less than 9 species per m² NB – This criterion is essential for achieving good condition for non-acid grassland types. Condition: Poor



	Grassland Condition Assessment (Medium o	distinctiven	ess) (Tall herbs) (14)
	Criteria	Y/N	Notes
1	The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type. Wildflowers, sedges, and indicator species for the specific habitat type are very clearly and easily visible throughout the sward. NB — This criterion is essential for achieving moderate condition for non-acid grassland types.	N	Species composition does not match specific grassland type.
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm)	N	100% of grassland was greater than 20cm.
3	Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	Υ	No bare ground.
4	Cover of bracken less than 20% and cover of scrub (including bramble) less than 5%.	N	Bracken and scrub coverage greater than 20%.
5	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981). Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.	Y	No invasive species.
6	There are greater than 9 species per metre squared. NB – This criterion is essential for achieving good condition for non-acid grassland types.	N	Less than 9 species per m ²
	Condition:		Poor

	Grassland Condition Assessment (Medium distinctiveness) (Tall herbs) (15)				
	Criteria	Y/N	Notes		
1	The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type. Wildflowers, sedges, and indicator species for the specific habitat type are very clearly and easily visible throughout the sward. NB — This criterion is essential for achieving moderate condition for non-acid grassland types.	N	Species composition does not match specific grassland type.		
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm)	N	100% of grassland was greater than 20cm.		

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3	Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	Υ	No bare ground.
4	Cover of bracken less than 20% and cover of scrub (including bramble) less than 5%.	N	Bracken and scrub coverage greater than 20%.
5	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981). Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.	Y	No invasive species.
6	There are greater than 9 species per metre squared. NB – This criterion is essential for achieving good condition for non-acid grassland types.	N	Less than 9 species per m ²
	Condition:		Poor



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Grassland Condition Assessment (Low distinctiveness) (1)

Cri	teria	Y/ N	Notes
1	There must be 6-8 species per m ² .	N	Less than 6 species per m ²
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm).	N	100% of the grass is less than 7cm.
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note – patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat.	Υ	No scrub present.
4	Physical damage is evident in less than 5% of total grassland area, examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	N	High levels of damage from walking and highly managed.
5	Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	Υ	No bare ground.
6	Cover of bracken less than 20%.	Υ	No bracken present.
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Υ	No invasive species present.
	Condition:		Poor



Other Woodland, Broadleaved (6)								
	Indicator	Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator			
1	Age distribution of trees ¹	Three age classes present	Two age classes present	One age class present	1			
2	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland ²	Evidence of significant browsing pressure is present in 40% or less of whole woodland	Evidence of significant browsing pressure is present in 40% or more of whole woodland	3			
3	Invasive plant species ³	No invasive species present in woodland	Rhododendron or laurel not present, other invasive species < 10% cover	Rhododendron or laurel present, or other invasive species > 10% cover	3			
4	Number of native tree species	Five or more native tree or shrub species found across woodland parcel	Three to four native tree or shrub species found across woodland parcel	None to two native tree or shrub species across woodland parcel	3			
5	Cover of native tree and shrub species	> 80% of canopy trees and >80% of understory shrubs are native	50-80% of canopy trees and 50-80% of understory shrubs are native	< 50% of canopy trees and <50% of understory shrubs are native	3			
6	Open space within woodland ⁴	10 – 20% of woodland has areas of temporary open space, unless woodland is <10ha in which case lower threshold of 10% does not apply	21- 40% of woodland has areas of temporary open space	More than 40% of woodland has areas of temporary open space	3			
7	Woodland regeneration ⁵	All three classes present in woodland; trees 4-7cm dbh, saplings and seedlings or advanced coppice regrowth	One or two classes only present in woodland	No classes or coppice regrowth present in woodland	1			
8	Tree health	Tree mortality less than 10%, no pests or diseases and no crown dieback	11% to 25% mortality and/or crown dieback or low risk pest or disease present	Greater than 25% tree mortality and or any high risk pest or disease present	3			

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9	Vegetation and ground flora	Ancient woodland flora indicators present	Recognisable NVC plant community present	No recognisable NVC community	1
10	Woodland vertical structure ⁶	1	Two storeys across all survey plots	One or less storey across all survey plots	1
11	Veteran trees ⁷	1	One veteran tree per hectare	No veteran trees present in woodland	1
12	Amount of deadwood	1	Between 25% and 50% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps	Less than 25% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps	1
13	Woodland disturbance ⁸	2	Less than 1 hectare in total of nutrient enrichment across woodland area and/or less than 20% of woodland area has damaged ground	More than 1 hectare of nutrient enrichment and/or more than 20% of woodland area has damaged ground	2
	26				
	Moderate				

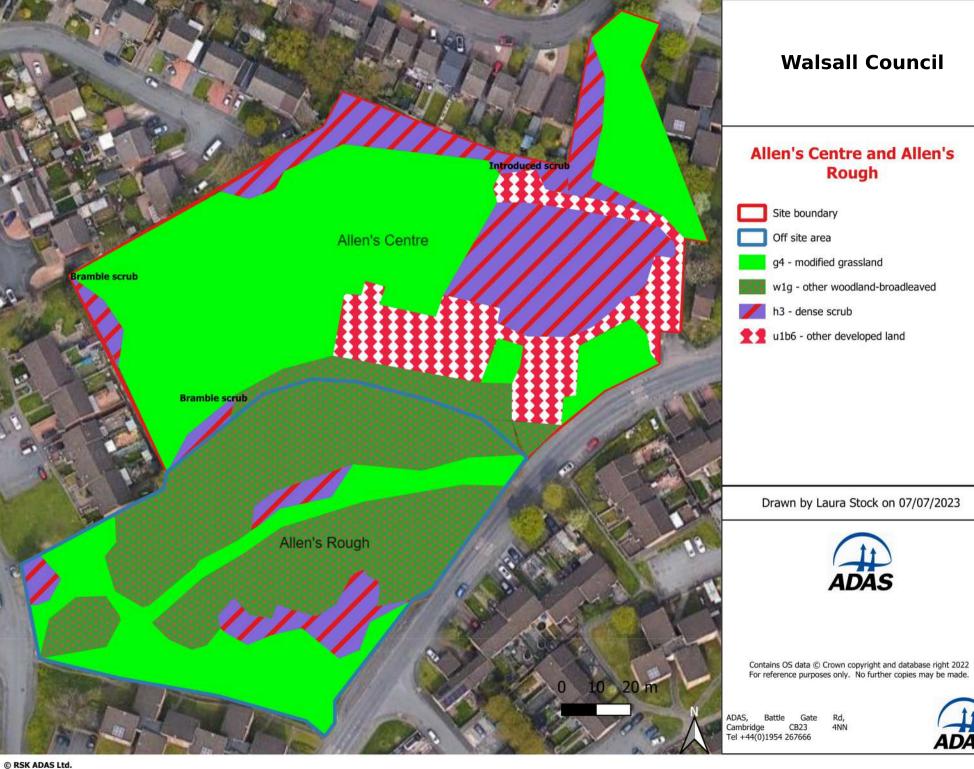


Appendix 5: Baseline Habitat Maps

See following page.



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Planting Area 1 Existing Woodland **Planting Area 2** 0 10 20 m

Walsall Council

Planting Area 1 Planting Area 2 Existing Woodland

Off site area

g3 - neutral grassland

g3c - other neutral grassland

g4 - modified grassland

w1g - other woodland-broadleaved

Drawn by Laura Stock on 07/07/2023



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Appendix 6: Photographs







Photograph 7 – Existing Woodland, broadleaved woodland



Photograph 8 – Existing Woodland tall herb and modified grassland



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