CSA environmental

Land South of
Guarlford Road, Malvern

# Biodiversity Net Gain Assessment

Prepared by
CSA Environmental

on behalf of
Fisher German LLP

Report No: CSA/4783/07

August 2020

urban design | ecology | landscape | heritage

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

| Report Reference | Date | Revision | Prepared by | Approved by | Comments |
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| CSA/4783/07 | 26/08/2020 | - | TP | KC | |
| | 19/01/2021 | A | TP | KC | |
| | | | | | |

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**Appendices**

# 1.0 INTRODUCTION

1.1 This report has been prepared by CSA Environmental on behalf of Fisher German LLP in relation to Land South of Guarlford Road, Malvern. It provides a summary of the results of a Biodiversity Net Gain Assessment (BNGA) of proposed residential development comprising up to 155 dwellings, for which outline planning permission is sought.

1.2 The Site occupies an area of c. 15.05ha and consists of three arable fields bounded by native hedgerows with mature trees, eight on-site ponds and a short section of Guarlford Road where access is proposed at its junction with Mill Lane (see Habitats Plan in Appendix A). The Site is located around a central grid reference of SO 79896 45127, to the east of Malvern, Worcestershire.

1.3 This Assessment has been informed by an extended Phase 1 Habitat survey which was undertaken in March 2020 as part of a Preliminary Ecological Appraisal (PEA), in addition to a desk-top study for relevant habitat and / or strategic nature conservation designations.

1.4 Calculation of biodiversity net gain units has been undertaken using the Natural England Biodiversity Metric 2.0 (Beta Version; December 2019); and follows guidance set out within the Biodiversity Net Gain: Good Practice Principles for Development (Baker *et al.*, 2019).

1.5 This BNG Assessment aims to:

- Baseline data: classify the type, distinctiveness, condition, connectivity and strategic significance of habitats present prior to and post- development.
- Ensure that baseline habitat conditions are classified in a robust and consistent manner, and that classification is based on the best data available data at the time of assessment.
- Clearly identify data collection methods and any limitations.
- Calculate baseline pre- and post-development habitat units and hedgerows units for the Site based on current development proposals.
- Propose a Biodiversity Net Gain design with the aim of maximising biodiversity net gain through habitat creation, enhancement and succession.
- Aim to achieve BNG on-Site wherever possible; with off-site measures being considered as an alternative option if required.

# 2.0 PLANNING POLICY AND LEGISLATION

2.1 The National Planning Policy Framework (NPPF3) (Ministry of Housing, Communities and Local Government, 2019) sets out requirements for the delivery of biodiversity net gain, and this is supported within Planning Policy Guidance (PPG) (updated July 2019). The Natural Environment PPG addresses principles across a broad spectrum of topics targeting biodiversity conservation, from individual site and species protection through to the supporting of ecosystem services, and the use of local ecological networks to support the national Nature Recovery Network. In particular the PPG promotes the delivery of **measurable Biodiversity Net Gain through the creation and enhancement of habitats alongside development.**

2.2 The Government has confirmed its intention to mandate Biodiversity Net Gain at a minimum of 10%. It is envisaged that this will be enacted into UK law through adoption of the Environment Bill. Whilst the Bill is still to receive Royal Assent, and once this has been achieved a two-year implementation period is expected, many Local Planning Authorities have started to include biodiversity net gain requirements into Local Plan policy.

2.3 The South Worcestershire Development Plan Review Preferred Options Consultation (November 2019) makes reference to generating net gains through habitat enhancement, restoration and creation, although it does not yet state what percentage net gain is required.

# 3.0 BIODIVERSITY NET GAIN: GOOD PRACTICE PRINCIPLES

## Biodiversity Net Gain

3.1 Biodiversity net gain has been defined as 'development that leaves biodiversity in a better state than before, and an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation' (Baker, 2016).

## Good Practice Principles

3.2 Good practice principles for biodiversity net gain are set out within Table 1.1 of Biodiversity Net Gain: Good Practice Principles for Development (Baker et al., 2019). Key principles include:

- Apply the 'Mitigation Hierarchy' (in line with CIEEM Guidelines for Ecological Impact Assessment (EcIA) (CIEEM, 2018) and be 'additional' by achieving outcomes that exceed existing obligations.
- Avoid losing biodiversity which cannot be off-set elsewhere (e.g. irreplaceable habitats).
- Address risk (e.g. difficulty of achieving habitat creation / enhancement for net gain).
- Make a 'measurable' net gain contribution (e.g. calculated using an appropriate metric) and ensure that calculations consistent and transparent (i.e. limitations and assumptions are clearly identified).
- Ensure that net gain design achieves the best outcome for biodiversity (this may require both quantitative and qualitative assessment) and create a net gain legacy for long-term benefits.

# 4.0 METHODS

## Desk Study

4.1 In order to inform an assessment of the habitat types, condition and strategic significance a desk study was undertaken. This comprised a review of the following:

- The South Worcestershire Development Plan (Adopted February 2016)
- South Worcestershire Development Plan Review Preferred Options Consultation (November 2019)
- Multi-Agency Geographic Information for the Countryside (MAGIC) online database (accessed March 2020) - to identify statutory nature conservation designations.
- Data search response from Worcestershire Biological Records Centre (March 2020) - to identify non-statutory nature conservation designations.

4.2 Relevant desk study data are presented in the Ecological Impact Assessment (CSA/4783/05).

## Extended Phase 1 Habitat Survey

4.3 Extended Phase 1 Habitat survey (JNCC, 2010) information was initially collected at a suboptimal time period for botanical survey on 17 March 2020 (Tom Preece GradCIEEM FISC Level 3), and therefore subsequently updated between April – June 2020 alongside other species surveys to inform classification of habitat type and condition. Habitats recorded are mapped on the Habitats Plan (CSA/4783/100) provided in Appendix A. Botanical species lists for each habitat identified are provided within the Ecological Impact Assessment (CSA/4783/05).

4.4 The Biodiversity Metric 2.0 works best where habitat types are classified using UK Habitats Classification methodology (UKHAB Working Group, 2018). As such tab G9 'Translation Phase 1' of the Metric was used to translate Phase 1 habitats into UKHAB codes provided within the Metric. This informed the calculation of baseline biodiversity units.

## Condition Assessment

4.5 Habitat condition was assigned following guidance from the 'Technical Supplement' document (Natural England, 2019) which accompanies the Biodiversity Metric 2.0. Assessment criteria were followed for each

broad habitat type, to determine the condition of each habitat for both on-site and off-site land.

### Ecological Connectivity

4.6 The ecological connectivity for habitat types was calculated using the guidance from the Biodiversity Metric 2.0 User Guide (2019). Thus, scores for habitats with 'High' distinctiveness are deemed to have 'Medium' connectivity, whilst habitats with either 'Medium' or 'Low' distinctiveness are considered to have 'Low' connectivity. This guidance was released before the 'Connectivity Calculator' feature was added to the Metric (N.B. this feature is still not currently functional in the Beta Version 2.0).

### Strategic Significance

4.7 This criteria within the Biodiversity Metric 2.0 was assessed by determining if habitat areas within the Site occur within any strategic locations for biodiversity, form part of a designated site for nature conservation or are identified within local plans such as Ecological Networks or stepping stone features.

### Measurement of Habitat Area

4.8 Baseline and proposed habitat areas were measured as distinct habitat parcels. Baseline habitat parcels for both on-site and off-site land were measured using habitat mapping and aerial imagery overlain in AutoCAD. Post-development habitats were calculated by measuring the Development Framework Plan Rev B (CSA/4783/111) allowing areas of retained, created and enhanced habitat to be identified.

# 5.0 CALCULATION OF BIODIVERSITY UNITS

5.1 The Biodiversity Metric 2.0 (Beta Version, December 2019) was used to calculate the change in biodiversity units (including habitat units and hedgerow units) and the overall percentage of gain/loss achieved. Metric calculations have been undertaken by Tom Preece GradCIEEM who has completed the 'Calculating and Using Biodiversity Units with Metric 2.0 CIEEM Training Course' (December, 2019).

5.2 Biodiversity net gain calculations were undertaken based on the Development Framework Plan Rev B in Appendix B. Habitat condition for both retained and created habitats was assigned taking a precautionary approach and with consideration of biotic and operational phase conditions (i.e. which may limit the extent to which 'good' condition is likely to be reached).

5.3 A full copy of the Biodiversity Metric 2.0 calculator is provided alongside this report in Appendix C.

## Assumptions & Limitations

5.4 It should be noted that the accuracy of habitat area measurement is limited by the form of baseline data collection and resolution of development proposal plans. In this instance, baseline habitat areas have been calculated by cross referencing illustrative Habitats Plans with aerial imagery. Post-development habitat areas have been measured from the illustrative Development Framework Plan. In the absence of detailed planting plans, reasonable assumptions have been made with regards to the type/condition of habitats that could be created.

5.5 As development proposals are only at the outline stage, 'Urban - suburban - mosaic' has been used as the habitat classification for all built areas (i.e. 'Proposed Development Footprint' as shown on the Landscape Concept Plan). It is understood that Natural England recommend use of the 'Urban - suburban - mosaic' category at the outline planning stage as the mix of 'Developed Land – Sealed Surfaces) Vs 'Gardens – Vegetated / Vegetated) is not yet determined.

# 6.0 RESULTS

## Condition Assessment

On-site habitats

6.1 The dominant habitat on-site is arable land under the 'Cropland - cereal crops' definition (Fields F1 – F3). A c. 15m strip along the west of the Site in field F1 and F3 is considered to be Cropland – Arable field margins cultivated annually as they had a sparse sward, however they were sown with chicory *Cichorium intybus* to increase its diversity, this was not put under the 'Cropland – arable field margin game bird seed mix' as this was not thought to be to attract game birds. Additionally areas of less managed arable field margins were categorised as 'Cropland – arable field margins tussocky'. As these all fall under the agricultural category there is no need to undertake a condition assessment and they are atomically assigned a score within the matrix.

6.2 Two small sections of grassland are present in the north-west and north-east of the site along Guarlford Road and both are part of the Guarlford Green & Rhydd Green LWS designated for MG5 grassland a habitat of principle importance. These two areas are for the main access and emergency access to the Site. The area in the north-east for the main access to the Site is heavily mown and managed due to the presence of properties unlike other areas of the LWS. Due to this management the key characteristics of good quality grassland are not apparent and it is considered to be in 'moderate' condition. As these areas are categorised as 'Grassland-Lowland meadows' bespoke mitigation is required to mitigate for the total loss of 0.03ha across both areas.

6.3 To mitigate for the loss of 0.03ha of lowland meadow to facilitate the main access and emergence access it is proposed a total of 0.38ha of lowland meadow is created in the north-east of the Site adjacent to Guarlford Green & Rhydd Green LWS to keep continuity. This can be created by the translocation of topsoil where appropriate, and seeding by green hay of local provenance.

6.4 Hedgerows on-site have clearly been subject to long term management and vary in their condition assessment due to the number of gaps in the hedgerow, presence of undesirable vegetation indicating enrichment, particularly common nettle, and many of the hedgerows have been ploughed to within 1m of the base of the hedgerow. Hedgerow H10 is the only ornamental non-native hedge as it is a garden hedgerow comprising of Lawson's cypress *Chamaecyparis lawsoniana*. However, no hedgerows failed more than 4 criteria and are all considered to be in 'moderate or good' condition.

6.5 Ponds present on-site are considered to be of 'moderate' quality as there is a lack or riparian land surrounding the ponds with most having

ploughed arable land nearby. Some ponds area shaded over 50% and they are likely to be polluted slightly from the run off from the agricultural land; however, the water quality is not considered poor and the water levels fluctuate naturally and are absent of non-native species.

6.6 The mixed woodland on-site is considered to be of 'moderate' condition as it consists of mature oak trees on the periphery, with non-native Lawson's cypress planted centrally and also several fir trees present. Furthermore, the woodland is not protected from damage from adjacent agricultural activities such as spraying drift or ploughing.

6.7 Small areas of bramble scrub are present along field boundaries and around some of the on-site ponds Site, which is considered to be in 'poor' condition.

6.8 A few individual trees, additional to those in hedgerows/tree lines, are present around the on-site ponds and are considered to be in 'moderate' condition.

6.9 A summary of the condition criteria used to assess habitat condition for linear hedgerow habitats is given in Tables 1-2 below. The full condition assessments for are provided in Appendix D.

**Table 1**. Habitat Condition Assessment Method: Hedgerows

| **Hedgerow Favourable Condition Attributes** | | |
|---|---|---|
| **Attributes and functional groupings** | **Criteria (minimum requirements for 'favourable condition')** | **Description** |
| A1. Height | >1.5m average along length | Average height of woody growth estimated from base of stem to top of shoots |
| A2. Width | >1.5m average along length | Average width of woody growth estimated at widest point of the canopy |
| B1. Gap – hedge base | Gap between ground and base of canopy <0.5m for >90% of length (unless line of trees) | Vertical gappiness of woody component, and its stance from the ground to the lowest leafy growth |
| B2. Gap – hedge canopy continuity | Gaps make up <10% of total length, and<br>No canopy gaps >5m | Horizontal gappiness of woody component. Gaps are complete breaks in the canopy (no matter how small).<br>Access points and gates contribute to overall gappiness but not subject to 5m criterion |
| C1. Undisturbed ground | >1m width of undisturbed ground with perennial herbaceous vegetation for >90% of length is present on at least one site of hedge | - |
| C2. Undesirable perennial vegetation | Plant species indicative of nutrient enrichment of soils dominate <20% of cover of the area of undisturbed ground | Indicator species used are nettles (*Urtica* spp.), cleavers (*Galium aparine)* and docks (*Rumex* spp.). Their presence should not exceed the 20% cover threshold |

| | | |
|---|---|---|
| D1. Invasive and neophyte species | >90% of hedgerow and undisturbed ground is free of invasive non-native and neophyte species | Neophytes are plants that have naturalised in the UK since AD 1500 |
| D2. Current Damage | >90% of hedgerow or undisturbed ground is free of damage caused by human activities | Criterion addresses damaging activities that may have led to or lead to deterioration in other attributes, and could include evidence of pollution, piles of manure or rubble, or inappropriate management practices |

**Table 2:** Hedgerow Condition Assessment and Weighting

| Condition Categories for Hedgerows | | |
|---|---|---|
| **Category** | **Maximum number of attributes that can fail to meet 'favourable condition' criteria** | **Weighting (score)** |
| Good | No more than 2 failures in total and no more than 1 in any functional group | 3 |
| Moderate | No more than 4 failures in total and fails both attributes in a maximum of one functional group | 2 |
| Poor | Fails a total of more than 4 attributes or both attributes in more than one functional group | 1 |

## Biodiversity Unit Calculations

*6.10* Based on the Biodiversity Metric 2.0 calculations, the base line for the Site habitats total 40.22 habitats units (not including the small areas of lowland meadow) with 16.23 hedgerow units the proposed development alone (inclusive of on-site intervention) would result in an overall gain of 17.34 habitat units and of 0.17 hedgerow units. The proposed scheme was designed in liaison with the design team to retain and protect key corridors where possible.

**Table 3:** Qualitative Assessment of Biodiversity Impact

| Baseline Habitat | Ecological Function | Impact | Post-Development |
|---|---|---|---|
| Cropland | Arable land provided limited resources | Lost due to the development | Replaced by improved habitats as below |
| Grassland – other neutral grassland | Provides habitat for a range of local wildlife including invertebrates, birds, GCN, badger and bats | Minor loss of resource (0.03ha) | Large increase in this resource on site with a total of 3.37ha of moderate quality neutral grassland on-site |
| Heathland and shrub - bramble scrub / and hedgerows | Provide connectivity, foraging and nesting resources for local wildlife (e.g. birds, GCN, bats) | The majority of hedgerows / habitat connectivity retained but some losses for access (0.13km), loss of small areas of bramble encroachment | Provision of new native species-rich hedgerow on-site (0.15km combined) and a large increase in thicket planting 1.96ha to improve connectivity and nesting resource |
| Woodland | Provide sheltering, foraging and nesting resource and connectivity for | Woodland retained and protected | Woodland retained and protected |

| | | | |
|---|---|---|---|
| | range of local wildlife (bats, birds, badgers, GCN) | | |
| Lakes – Ponds (Priority Habitats) | Provided breeding opportunities for amphibian (GCN) or foraging for other species | The ponds are retained alongside the development | The ponds are retained alongside the development and two new ponds 0.09ha will be created in the POS |

6.11 A qualitative assessment of Biodiversity Net Gain should also be assessed to ensure that scheme design delivers the best and most appropriate habitat measures which maintain and enhance ecological functionality of a site and delivers benefits for local biodiversity. A qualitative assessment of the biodiversity impact of the scheme is provided in Table 3.

6.12 Ecological functionality will be maintained at the Site through retention and enhancement of the hedgerow network, with new hedgerow planting where possible across the Site and significant areas of thicket planting proposed within the Public Open Space (POS) area in the south of the Site. Significant areas of new grassland habitat is being provided within areas of POS some of these areas are along the northern boundary of the Site adjacent to the LWS to the north designated for its MG5 grassland and provided connectivity to the south along the eastern boundary corridor. These measures will ensure that suitable habitat resources are available for protected species (e.g. bats and great crested newt) and in the longer term provide foraging / nesting resources (e.g. for breeding birds).

# 7.0 DISCUSSION

7.1 Biodiversity Net Gain calculations, using the Biodiversity Metric 2.0 (Beta Version, December 2019) have been undertaken for the proposed development at Land south of Guarlford Road, Malvern. Baseline habitat calculations have been informed by Phase 1 habitat survey work and subsequent condition assessments, and a desk-stop study. Post-development calculations have been made based on the Development Framework Plan. Assumptions and limitations to the assessment have been highlighted where relevant, and identified in the Metric calculator which should be reviewed in conjunction with this report.

7.2 A unit gain of 17.89 habitat units was identified following the completion of baseline and post-development calculations, due significant areas of arable land being replaced by grassland habitats of 'modified' grassland and neutral grassland habitats. This accounts for **43.11% net gain in habitat units** present at the Site. A unit gain of 0.17 hedgerow units is calculated where replacement hedgerow for those to be removed by the development is proposed thus is a **1.02%net gain in hedgerow units** post development.

7.3 The net gains in biodiversity units shown to be possible as part of this development meet the current requirements of both national (NPPF) and local policy (South Worcestershire Development Plan Review Preferred Options Consultation); as well as, the Government's proposed intentions of mandating Biodiversity Net Gain at a minimum of 10% through adoption of the Environment Bill in the near future.

## Appendix A

Habitats Plan (CSA/4783/100B)

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- Site boundary
- A — Arable
- SI — Semi-improved grassland
- Broadleaved woodland
- Intact hedgerow
- Defunct hedgerow
- Tree
- Scattered scrub
- Scattered tall ruderal
- Pond
- Running water
- Dry ditch
- Hardstanding
- Fence
- Gate
- Fn — Field number
- Hn — Hedgerow number
- Wn — Woodland number
- Pn — Pond number
- n — Target note
  1. Badger latrine
  2. Snuffle holes

N

0 50 200metres

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| | | | |
|---|---|---|---|
| Project | Land South of Guarlford Road, Malvern | Date April 2020 | Drawing No. CSA/4783/100 |
| Drawing Title | Habitats Plan | Scale Refer to scale | Rev B |
| Client | Fisher German LLP | Drawn TR | Checked KC |

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## Appendix B

Development Framework Plan (CSA/4683/111B)

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| Rev | Date | By | Description |
|---|---|---|---|
| B | 05.08.2020 | RC | Access amendments |
| A | 27.07.2020 | SG | General amendments |

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|---|---|
| Project | Land south of Guarlford Road, Malvern |
| Title | Development Framework Plan |
| Client | Fisher German LLP |

| | | | |
|---|---|---|---|
| Scale | 1:2,500 @ A3 | Drawn | SG |
| Date | June 2020 | Checked | RR |
| Drawing No. | CSA/4783/111 | Rev | B |

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## Appendix C

Biodiversity Metric 2.0 Calculation

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## Headline Results

Return to results menu

| | | |
|---|---|---|
| On-site baseline | *Habitat units* | 40.22 |
| | *Hedgerow units* | 16.23 |
| | *River units* | 0.00 |
| On-site post-intervention (Including habitat retention, creation, enhancement & succession) | *Habitat units* | 57.55 |
| | *Hedgerow units* | 16.40 |
| | *River units* | 0.00 |
| Off-site baseline | *Habitat units* | 0.00 |
| | *Hedgerow units* | 0.00 |
| | *River units* | 0.00 |
| Off-site post-intervention (Including habitat retention, creation, enhancement & succession) | *Habitat units* | 0.00 |
| | *Hedgerow units* | 0.00 |
| | *River units* | 0.00 |
| Total net unit change (including all on-site & off-site habitat retention/creation) | *Habitat units* | 17.34 |
| | *Hedgerow units* | 0.17 |
| | *River units* | 0.00 |
| Total net % change (including all on-site & off-site habitat creation + retained habitats) | *Habitat units* | 43.11% |
| | *Hedgerow units* | 1.02% |
| | *River units* | 0.00% |

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# Appendix D

Habitat Condition Assessments

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**Table 1. Hedgerow Condition Assessments**

| Condition Criteria | Hedge Reference | | | | | | |
|---|---|---|---|---|---|---|---|
| | **H1** | **H2** | **H3** | **H4** | **H5** | **H6** | **H7** |
| **A1.** Height >1.5m average | Pass | Pass | Pass | Pass | Fail – short low section of hedge | Pass | Pass |
| **A2.** Width >1.5m average | Pass | Pass | Pass | Pass | Pass | Pass | Pass |
| **B1.** Gap between ground and base of Canopy <0.5m along >90% of length | Pass | Pass | Pass | Pass | Pass | Pass | Pass |
| **B2.** Gaps <10% total length, with no canopy gaps >5m | Pass | Pass | Fail – large gaps particularly in north section of hedge | Fail | Fail | Pass | Pass |
| **C1.** >1m width undisturbed ground with perennial herb for >90% length on at least one side | Pass | Fail – ploughed to within 1m of hedgerow | Fail – ploughed to within 1m of hedgerow | Fail – ploughed to within 1m of hedgerow | Fail – ploughed to within 1m of hedgerow | Fail – ploughed to within 1m of hedgerow | Fail – ploughed to within 1m of hedgerow |
| **C2.** Undesirable vegetation indicating enrichment dominates <20% (nettles/cleavers/docks etc.) | Pass - nettle and docks present but less than 20% at time of survey | Pass | Pass | Fail – nettles present | Fail – nettles present | Pass | Fail – nettles present |
| **D1.** >90% of hedgerow/undisturbed ground is free of invasive non-native and neophyte species | Pass | Pass | Pass | Pass | Pass | Pass | Pass |
| **D2.** >90% of hedge/ground is free of damage caused by human activities (pollution, manure, rubble, excessive hedge cutting etc.) | Fail – Manure heap next to hedgerow in the north | Pass | Pass | Pass | Pass | Pass | Pass |
| **Total fails** | 1 | 1 | 2 | 3 | 4 | 1 | 2 |
| **Condition** | **Good** | **Good** | **Good** | **Poor** | **Moderate** | **Good** | **Moderate** |

| Condition Criteria | Hedge Reference | | | | | |
|---|---|---|---|---|---|---|
| | **H8** | **H9** | **H10** | **H11** | **H12** | **H13** |
| **A1.** Height >1.5m average | Pass | Pass | Pass | Pass | Pass | Pass |
| **A2.** Width >1.5m average | Pass | Pass | Pass | Pass | Pass | Pass |
| **B1.** Gap between ground and base of Canopy <0.5m along >90% of length | Pass | Pass | Pass | Pass | Pass | Pass |
| **B2.** Gaps <10% total length, with no canopy gaps >5m | Pass | Pass | Pass | Fail | Fail | Pass |
| **C1.** >1m width undisturbed ground with perennial herb for >90% length on at least one side | Fail – ploughed to within 1m of hedgerow | Fail – ploughed to within 1m of hedgerow | Pass | Fail – ploughed to within 1m of hedgerow | Fail – ploughed to within 1m of hedgerow | Pass |
| **C2.** Undesirable vegetation indicating enrichment dominates <20% (nettles/cleavers/docks etc.) | Fail – nettles present | Fail – nettles present | Fail – nettles present | Fail – nettles present | Fail – nettles present | Pass |
| **D1.** >90% of hedgerow/undisturbed ground is free of invasive non-native and neophyte species | Pass | Pass | Pass | Pass | Pass | Pass |
| **D2.** >90% of hedge/ground is free of damage caused by human activities (pollution, manure, rubble, excessive hedge cutting etc.) | Pass | Pass | Pass | Pass | Pass | Pass |
| **Total fails** | 2 from same category | 2 from same category | 2 | 3 | 3 | 0 |
| **Condition** | **Moderate** | **Moderate** | **Good** | **Moderate** | **Moderate** | **Good** |

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