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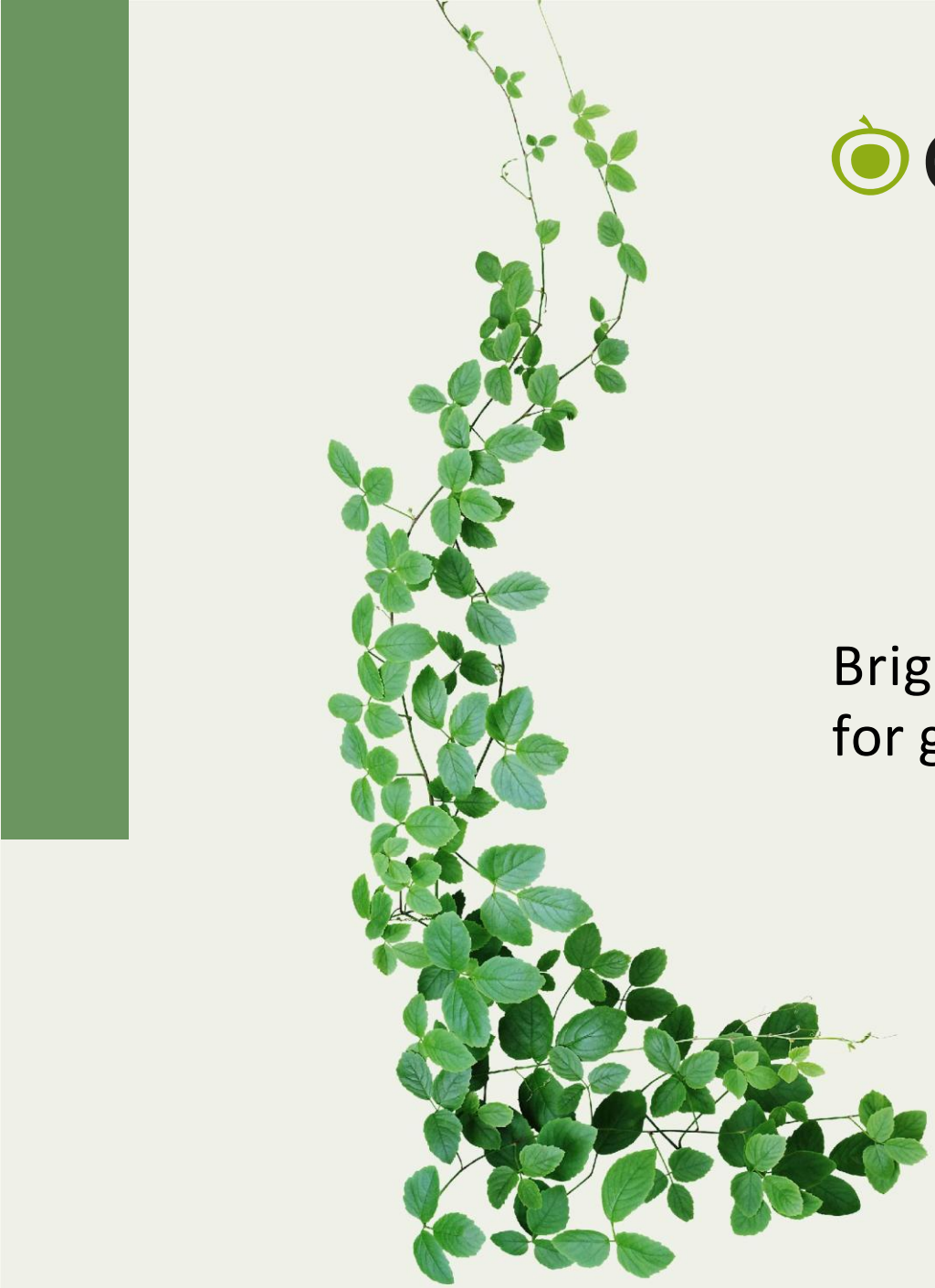

Client: Shall Do Hayes Development Ltd

Project: Hayes Park West

Report: Biodiversity Net Gain Assessment

QUALITY ASSURANCE

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Prepared by:	Laura Thomas	Laura Thomas
Authorised by:	Rosie Lodge	Paul White
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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd (Greengage) was commissioned by Shall Do Hayes Development Ltd ('the Applicant') in May 2025 to undertake a Biodiversity Net Gain Assessment (BNGA), using the Statutory Biodiversity Metric (SBM), for an area of land known as Hayes Park West, Hayes Park, Uxbridge, UB4 8FE in the London Borough of Hillingdon ('the Council') hereafter referred to as 'the site'.

This application seeks full planning permission for the following description of development: *"Partial demolition and redevelopment of the existing multi storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works."*

The BNGA aims to quantify the predicted change in biodiversity value of the site in light of the proposed development to assess compliance against national and local planning policy and against the BNG mandate set out in the Environment Act 2021, which states that all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% biodiversity net gain.

The site area extends to 0.9 hectares (ha) and comprised predominantly developed land; sealed surface modified grassland, mixed scrub, ruderal/ephemeral, introduced shrub, other green roof (in the form of rooftop planters), other woodland; mixed, urban trees and native hedgerow, as identified from a site walkover as part of a Preliminary Ecological Appraisal (PEA)[1] undertaken on 15th July 2025, alongside data received from a desk study [report reference 553349bnkp25Sept25FV01_PEA].

Proposed habitat creation includes 0.0462 ha of modified grassland, 0.0517 ha of mixed scrub, 0.0056 ha of artificial unsealed surface (to avoid double counting a hedgerow), 0.0319 ha of introduced shrub, 0.0202 ha of vegetated gardens, 0.0411 ha of other woodland; mixed, and planting of 0.053 ha of urban trees and 0.003 ha of green wall. The development seeks to retain 0.0109 ha of modified grassland, 0.0209 ha of mixed scrub, 0.0022 ha of introduced shrub, the entire 0.1222 ha of = other woodland; mixed, and 0.2881 ha of urban trees. The development also seeks to enhance 0.0016 ha of modified grassland, 0.0071 ha of mixed scrub. The development seeks to retain 0.05km of native hedgerow and plant 0.05165km of hedgerow, likely ornamental.

The locations, extents, conditions and habitat parcel reference numbers of the pre-development (baseline) and post development habitats are mapped in Figure A.1 and Figure B.1. The habitat values are split into three categories: area-based 'Habitat Units' (HU), linear-based 'Hedgerow Units' (HeU) and aquatic linear-based 'Watercourse Units' (WU) respectively, where applicable to the site.

The pre-development baseline values are 3.95 HU and 0.20 HeU.

The 10% BNG targets are therefore 4.35 for HU, 0.22 for HeU, ideally delivered fully on-site.

The post-development design proposals are predicted to deliver 4.70 HU. This is a net gain of 0.75 HU (equivalent to + 18.99% for HU).

The post-development design proposals are predicted to deliver 0.25 HeU. This is a net gain of 0.05 HeU (equivalent to + 24.92% for HeU).

The design proposals do meet the BNG Trading Rules for all habitat types/distinctiveness levels.

The proposed development will include areas that will significantly contribute to the biodiversity value of the site, including the creation of other woodland; mixed. Therefore, a Habitat Management and Monitoring Plan (HMMP) for the habitat retention/enhancement, creation and long term management over 30 years (minimum) will be required for submission to the Council.

When these recommendations are adhered to, the proposals stand to be compliant with legislation and current planning policy.

As per the Environment Act 2021, upon receiving planning permission, the submission of a Biodiversity Gain Plan (BGP) to the Council will be required.

Alongside the BNGA, qualitative ecological enhancement recommendations have also been provided which contribute to further increasing the ecological value of the scheme. Refer to the PEA report reference 553349bnkp25Sept25FV01_PEA for details.

2.0 INTRODUCTION

Greengage Environmental Ltd (Greengage) was commissioned by Shall Do Hayes Development Ltd ('the Applicant') in May 2025 to undertake a Biodiversity Net Gain Assessment (BNGA), using the Statutory Biodiversity Metric (SBM), for an area of land known as Hayes Park West, Hayes Park, Uxbridge, UB4 8FE in the London Borough of Hillingdon ('the Council') hereafter referred to as 'the site'.

Under the Environment Act 2021, developments are mandated to achieve a 10% biodiversity net gain (BNG), and they may also be required to under local policy. Most Local Planning Authorities (LPA) require a 10% net gain delivered against a site's pre-development (baseline) value. This is determined through assessing the condition of pre-development habitats on the site i.e. calculating the baseline at the BNGA Baseline stage, followed by comparison against the anticipated changes in biodiversity value based on the development proposals.

This BNGA report identifies that the 10% BNG target will be reached on-site.

This BNGA has been undertaken in September 2025. Any further changes to the design will impact upon the BNG score and the SBM calculations will need to be updated to reflect such changes. This also carries forward throughout the entire lifetime of the project, including after planning permission has been granted, in and throughout the construction phase. BNG aims to give an accurate reflection of the changes happening on site.

2.1 SITE DESCRIPTION

The site area extends to approximately 1.21 hectares (ha) and is centred on Ordnance Survey National Grid Reference (OS NGR): TQ 08804 82571, OS Co-ordinates 508804, 182571.

The site predominantly consists of a two-tier, multi-storey car park (designated as B1). This sits within semi-natural, boundary landscaping, including areas of amenity grassland, mixed scrub, native hedgerows, woodland and scattered trees. Additionally, three sizeable roof-top planters on the top floor of B1 create green roofing elements.

The site is located within the wider former business park, known as Hayes Park, north of the town of Hayes in the London Borough of Hillingdon. The business park is currently undergoing a phased development with land immediately east of the site (referred to as 'Hayes Park North') currently an active construction site, pursuant to a separate planning application (reference: 12853/APP/2025/1587). Furthermore, land immediately south of the site (known as 'Hayes Park South and Central') also has planning permission for redevelopment (planning reference: 12853/APP/2023/1492).

Beyond the business park boundaries, the landscape generally takes on a more urban character with extensive residential housing, public amenities (e.g. schools, retail outlets, etc.) and associated infrastructure. There are also scattered parks/recreation grounds (closest is Hayes End Recreation Ground, located 0.66 kilometres (km) southwest), nature reserves (closest is Yeading Brook Meadows Local Nature Reserve (LNR) located 1.18km east) and allotments creating occasional vegetative landscape features. Immediately northwest of the site are areas of private parkland owned by the Church Commissioners. These are ultimately surrounded by further residential housing, and lack any significant connectivity to vegetated landscapes beyond.

2.2 PROPOSED DEVELOPMENT

This application seeks full planning permission for the following description of development: *"Partial demolition and redevelopment of the existing multi storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated works."*

A high proportion of open space and amenity space across the site, including the provision of private gardens, terraces and balconies, new play spaces, internal ancillary facilities, and extensive communal areas surrounding the building.

The 'Proposed Site Layout' has been informed by the following documents:

- 0489-SEW-HPW-00-DR-L-001001[2];
- 0489-SEW-ZZ-ZZ-SK-L-000200[3];
- 0489-SEW-ZZ-ZZ-SK-L-000201[4].

These documents have been produced by Studio Egret West, dated 4th September 2025 and have been used as the basis for information regarding the proposed post-development habitats and has been used to inform the comparison against the baseline values.

Studio Egret West issued updated plans on 7th October 2025, confirming that the only change since the previous iteration on 4th September 2025 is a reduction of 43m² of defensible planting (classified as vegetated gardens within the SBM habitat type). This area has been reallocated to bin storage (classified as developed land; sealed surface in the SBM). Given the minor nature of this amendment, Greengage has not reissued the BNGA post-development map or reprocessed the update through the QGIS Import Tool. Instead, a direct adjustment has been made by deducting 43m² (0.0043ha) from vegetated gardens and adding the same area to developed land; sealed surface within the SBM calculations. Additionally Iceni projects on the 12th November identified the redline boundary is extended to include the existing access road (Mead House Lane) and provided Greengage with the area of 0.3159 ha of developed land; sealed surface which is due to be retained as it is.

This has been supplemented by an extract from the Design and Access Statement (0489_DAS_Extract_Planting WIP_02.09.2025.pdf) which includes species lists for the habitats proposed.

3.0 METHODOLOGY

3.1 PRE-DEVELOPMENT (BASELINE)

Habitat Data

A Preliminary Ecological Appraisal (PEA) [Report Ref: 553349bnkp25Sept25FV01_PEA] has been undertaken by Greengage in accordance with guidance in the UK Habitat Classification System (UKHab)[5] and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal[6], in accordance with British Standard (BS) 42020: 2013: Biodiversity[7].

The PEA included a site walkover which identified and mapped the extent and distribution of different habitat types on site according to the standard UKHab classification methodology, i.e. using Primary Codes, and supplemented with Secondary Codes in square brackets. Habitats have been split into 'habitat parcels' e.g. u1b5 – Buildings [89 – Other green roof] within the report, for the purposes of denoting differentiations in characteristics/composition within habitat types, where applicable. A habitat map was produced to illustrate the results, which is provided as Appendix A.

During the PEA, the habitats were also subject to Condition Assessments, where relevant, in accordance with the SBM Condition Assessments. (See 'Habitat Condition' below).

Statutory Biodiversity Metric Calculation Tool

This BNGA uses the government mandated methodology within the 'Statutory Biodiversity Metric User Guide' (SBM User Guide), distributed by Department for Food Environment and Rural Affairs (Defra), February 2024[8].

BNG uses habitat type and condition as a proxy for overall biodiversity value, measured in Biodiversity Units (BU) which are calculated using the SBM. The BU are separated into area-based Habitat Units (HU), linear-based Hedgerow Units (HeU) and aquatic linear-based Watercourse Units (WU), as applicable to a site, respectively. For this site, HU and HeU are applicable.

The following information on each habitat type are the required SBM inputs:

- Type;
- Area/length;
- Condition; and
- Strategic significance.

The areas of each habitat parcel are measured, with each habitat parcel assigned a 'Distinctiveness', 'Condition' and 'Strategic Significance' score. Distinctiveness is a default score for the habitat classification, representing its inherent biodiversity value, whereas condition refers to the state each habitat parcel is in relative to a predetermined set of criteria outlined in the SBM User Guide.

Strategic significance draws upon priorities and objectives within local plans and strategies, and is measured by providing habitats with a score from low to high as follows:

- Low – "area / compensation not in local strategy";

- Medium – "location ecologically desirable but not in local strategy"; and
- High – "formally identified in local strategy".

To calculate the pre-development (baseline) BU value, habitat data collected during the PEA has been used. A BNGA habitat map has been created based on the data collected in the field using Coreo[9] software. The area extents for each habitat type shown in the BNGA habitat map were then measured using Quantum Geographical Information System (QGIS) software. See Appendix A.

To calculate the HU associated with trees on site, stem diameters of each tree were used to assign each tree a rating of 'small', 'medium', 'large' or 'extra large', in line with the User Guide. The rating corresponds to an area value to be used.

Distinctiveness values were automatically calculated for the site and habitat conditions were assessed both in the field, and retrospectively using site photos.

Type and Area/Length

Habitat types documented in the PEA use UKHab classifications and primary codes supplemented by secondary codes, where applicable. The SBM uses a classification system based mainly on the UKHab Classification System[5] but with input also from other systems including the Water Framework Directive (WFD) Lakes Typology[10], the European Nature Information System (EUNIS) habitat definitions[11], Habitats Directive Annex 1 definitions[12].

As such, UKHab classifications used in the PEA do not always translate directly into the SBM habitat types that are available for selection within the pre-set drop-down menus. Occasionally UK Hab secondary codes provide the key information to be able to allocate the SBM 'best fit' selection for the UKHab habitat type. Habitat conversions that are applicable to the site are listed in Table 3.1 below. The SBM classifications are hereafter used throughout the report.

Table 3.1 UKHab to SBM habitat conversions

UKHab Habitat Type	SBM Habitat Type	Reasoning
u1b5 - Buildings [804 - Car Park]	Developed land; sealed surface	Buildings are a sub-category of the developed land; sealed surface habitat type.
u1b5 - Buildings [89 - Other green roof]	Other green roof	Three planters on the carpark roof were classified as 'other green roof' as they do not meet the UKhab criteria for either 'intensive' or 'biodiverse' green roofs.
u1b6 - Other developed land [804 - Car park]	Developed land; sealed surface	Refers to a tarmacked surfaces surrounding the carpark structure and as such meets developed land; sealed surface habitat type.

UKHab Habitat Type	SBM Habitat Type	Reasoning
u1 - Built up areas and gardens [81 - Introduced shrub]	Introduced shrub	N/A - direct translation available. Secondary habitat type selected over primary habitat
g4 - Modified grassland	Modified grassland	N/A - direct translation available
g4 - Modified grassland [81 - Ruderal or ephemeral]	Ruderal/ephemeral	N/A - direct translation available. Secondary habitat type selected over primary habitat
g4 - Modified grassland [200 - tree]	Urban Tree	N/A - direct translation available. Secondary habitat type selected over primary habitat
h2a6 - Other native hedgerow [11 - Hedgerow with trees]	Native hedgerow	N/A - direct translation available. Primary habitat type selected over secondary habitat
h3h - Mixed scrub	Mixed scrub	N/A - direct translation available
w1h5 - Other woodland, mixed, mainly broadleaved	Other woodland; mixed	N/A - direct translation available

A habitat parcel reference has been applied to each area-based and hedgerow-based habitat type on the site, which is cross-referenced within the SBM calculation tool and Figure A.1.

For individual trees present on the site, the area extent attributed to individual trees has been calculated using the 'Tree helper' within the SBM calculation tool. This is based upon using Diameter at Breast Height (DBM) in centimetres (cm). The DBH measurements for individual trees within the site have been taken from BS 5837 Tree Survey Plan [ref: 250569-TMA-XX-DR-AP-2100-P00 Tree Survey]. In accordance with the SBM User Guide, based on 'Diameter at breast height (centimetres (cm)), tree sizes have been recorded as follows;

- Small is greater than 7.5 cm and less than 30 cm diameter,
- Medium is greater than 30 cm, to less than or equal to, 60 cm;
- Large is greater than 60 cm, to less than or equal to 90 cm; and,
- Extra large is greater than 90 cm.

Each tree has been given a habitat parcel number and referred to within the 'Assessors' comment box within the SBM.

Habitat Condition

Where applicable, habitats were subject to a condition assessment in accordance with the SBM Condition Assessments. Formalised copies of the Condition Assessments for the Baseline habitats are provided as Appendix C.

Habitats must be quantified using criteria set out by the SBM Condition Assessments to determine their relative condition.

The condition of a habitat is a measure of the biological 'working-order' of a habitat type judged against the perceived ecological optimum state for that particular habitat.

The condition of each habitat type was assessed against pre-set criteria and categorised as either 'Good', 'Fairly Good', 'Moderate', 'Fairly Poor' or 'Poor'. Where a habitat type varies in condition within the site this was recorded and mapped.

Strategic Significance

The SBM calculation tool accounts for whether the habitat is situated in an area locally identified as significant for nature.

Data on areas and habitats locally identified as significant for nature were obtained from the following:

- Multi-Agency Geographical Information for the Countryside (MAGIC) website for mapped statutory designated sites;
- Greenspace Information for Greater London (GiGL), was consulted in June 2025 during the PEA for records of statutory and non-statutory designated sites for nature conservation within and adjacent to the site;
- Habitats listed within the Local Biodiversity Action Plan (LBAP) for London[13] and the London Environment Strategy[14];
- Hillingdon Local Plan[15];
- Catchment Plans;
- National Character Area profiles; and/or,
- Priority Habitats for Restoration.

Using the SBM calculation tool, habitat values have been calculated based on whether they occur commonly or whether they are rare, their area (ha) (or length (km) for linear features such as hedgerows), condition and importance within the local area, usually identified from local relevant planning policies or documents.

3.2 POST- DEVELOPMENT (PROPOSED)

To calculate the post-development BU value, the area extents for each habitat type were measured based on the 'Proposed Site Layout', using Quantum Geographical Information System (QGIS) software. See Appendix B.

Habitat types were inferred from the species list provided as part of the DAS. Where justification for habitat types is required, this has been included in the table below.

Table 3.2 Landscape Plan to SBM Habitat Conversion

Landscape Plan (and codes)	SBM Habitat Type	Reasoning
Perennial meadow planting (S01)	Modified grassland	Whilst the grassland species are all native species and indicate other neutral grassland and it will be managed as a meadow, the

Landscape Plan (and codes)	SBM Habitat Type	Reasoning
		pockets of non-native and ornamental shrubs and bulbs proposed within the grassland create a non-natural or semi-natural habitat and as such modified grassland was awarded.
Woodland understorey planting (S02)	Other woodland; mixed.	As per UKHab definition of woodland, the parcels with over 25% tree cover were assigned other woodland; mixed (see row below for other alternative). Woodland understorey planting to include herbaceous perennials, shrubs and ornamental grass planting.
Woodland understorey planting (S02)	Introduced shrub	As per UKHab definition of woodland, the parcels with less than 25% tree cover were assigned introduced shrub (see row above for the alternative). Woodland understorey planting to include herbaceous perennials, shrubs and ornamental grass planting.
Defensible planting (S03)	Vegetated gardens	The defensible planting abuts private terraces and as such has been assigned vegetated gardens.
Edible ornamental planting (S04)	Introduced shrub	The planting comprises mainly non-native species.
Existing woodland boundary retained (S05)	Other woodland; mixed.	Retained habitat
Native hedgerow mix (S06)	Introduced shrub	The majority of buffer/hedgerow pockets are less than 20m long and, in some cases, over 5m wide. As such, these have been classed as Introduced shrub rather than hedgerow.
Raised planter on podium (S07)	Non-native and ornamental hedgerow.	Description: Hedgerow/ structural shrubs within raised planters. These habitats are linear features over 20m in length and less than 5m in width and as such has been assigned as hedgerow. Species for this habitat have not been provided so non-native and ornamental hedgerow has been assigned as a precaution.
Existing soft landscape (S08)	Retained habitat	Retained habitat
Trees	Other woodland; mixed.	As per UKHab definition of woodland, where trees comprise over 25% tree cover this habitat was assigned other woodland; mixed (see row below for the alternative).

Landscape Plan (and codes)	SBM Habitat Type	Reasoning
Trees	Urban tree	As per UKHab definition of woodland, where trees comprise below 25% tree cover these trees were assigned as individual trees (see row above for the alternative).

Targeted condition scores were assigned by Greengage, using the SBM habitat condition criteria, whilst considering the likely future use of each area on the 'Proposed Site Layout' and what was considered feasible to reach.

In accordance with the BNG Trading Rules, changes in broader habitat types (for example, 'Urban', 'Woodland' and 'Grassland' habitats) are also tracked, and trading habitats is discouraged unless specifically targeted within a local strategy. Trading down of habitats is not permitted.

The definition of 'significant enhancements', in accordance with government guidance (www.gov.uk) is 'areas of habitat enhancement which contribute significantly to the proposed development's BNG, relative to the biodiversity value before development'.

Retention of existing habitat does not count as an on-site enhancement.

What counts as a significant enhancement will vary depending on the scale of development and existing habitat, but these would normally be:

- habitats of medium or higher distinctiveness in the biodiversity metric;
- habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development;
- habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development;
- areas of habitat creation or enhancement which are significant in area relative to the size of the development;
- enhancements to habitat condition, for example from poor or moderate to good.

3.3 COMPETENCIES

In accordance with 'British Standard: 8683 (BS:8683) Process for designing and implementing biodiversity net gain – Specification', this BNGA and all associated condition assessments have been completed by competent, suitability trained and qualified ecologists.

Laura Thomas, Senior Consultant, has an undergraduate degree in Biology (BSc Hons) and a Master's degree in Evolutionary and Behavioural Ecology, holds a Natural England Bat Survey Level 1 Class Licence and is a Qualifying member of CIEEM. Laura has over seven years' experience in the commercial sector.

Rosie Lodge, Principal Consultant, has an undergraduate degree in Biological Sciences (BSc Hons), specialising in ecology and a Master's degree in Environmental Sustainability, specialising in climate change and conservation. She is a full member of the Institution of Environmental Sciences (IES) with over 15 years' experience in sustainability and ecological consultancy and currently focuses on green infrastructure and ecosystem service provision for the built environment.

Paul White, Associate Consultant, has a Bachelor's degree in Marine Biology (BSc Hons), a Natural England Great Crested Newt Licence and Dormouse Licence, and is an Associate member of CIEEM. Paul has over 16 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was written by Laura Thomas, reviewed by Rosie Lodge and verified by Paul White who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased, and exaggerated statements.

3.4 ASSUMPTIONS

Statutory Biodiversity Metric Calculation Tool

Strategic significance for the baseline has been determined to be low, with exception to the existing other woodland; mixed and connecting individual urban trees which were given medium distinctiveness as they are linked to the adjacent SINC.

Strategic significance of new post-development habitats has been determined to be low.

The condition of the habitats, either for the baseline or that a habitat is considered to be able to reach post-development, has been assessed using information within the SBM User Guide and based upon the ecologist's judgement of the habitats/input from the landscape architect.

Where there was no suitable UKHab or SBM habitat classification for a habitat, a 'best fit' alternative has been used with an explanation given to justify its use.

Note the sum of the values shown in columns within the Biodiversity Units tables may differ from the total units stated. This is due to rounding and is not considered significant. The totals stated reflect those calculated within the SBM calculation tool, based on the SBM User Guide.

4.0 RESULTS

4.1 PRE-DEVELOPMENT (BASELINE)

Desk Study

Statutory Designated Sites

The desk study identified one Special Protection Area (SPA) located within 10km, which is a statutory site of international importance; South West London Waterbodies SPA located 9.09km southwest from the site. Additionally, three of these are categorised as Local Nature Reserves (LNRs) which are of national importance statutory designated sites within 2km of the site; comprising Yeading Brook Meadows LNR (1.18km east), Yeading Meadows LNR (1.29km east) and Yeading Woods (1.51km northeast). For best practice, it is acknowledged here that measures to protect these designated sites from impacts by any future development should be undertaken and are fully detailed in the PEA. Full details of the statutory designated sites are shown in the PEA.

Non-statutory Designated Sites and/or Local Nature Reserves

The desk study had identified 10 non-statutory designated sites within 2km of the site. Those within 1km include Hayes Shrub Site of Importance for Nature Conservation (SINC) (0.4km east), Uxbridge Road Scrub, Hayes SINC (0.8km south), Home Covert, Lowdham Field and Pole Hill Open Space SINC (0.93km northeast). For best practice, it is acknowledged here that measures to protect these designated sites from impacts by any future development should be undertaken and are fully detailed in the PEA.

Ancient Woodland Inventory

The desk study had identified one parcel of Ancient Woodland within 2km of the site approximately 1.5km north.

There are no irreplaceable habitats identified within the site.

Statutory Biodiversity Metric Calculation Tool

Using the SBM calculation tool the baseline biodiversity values of the site have been identified to be 3.95 HU and 0.20 HeU. A breakdown of the baseline calculations for HU is provided in Table 4.1 below:

Table 4.1 Baseline Habitat Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Grassland	Modified grassland	0.015	Low	Poor	0.03
Grassland	Modified grassland	0.0016	Low	Poor	0.00
Heathland and shrub	Mixed scrub	0.023	Medium	Poor	0.09
Heathland and shrub	Mixed scrub	0.0071	Medium	Poor	0.03

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Sparsely vegetated land	Ruderal/Ephemeral	0.0389	Low	Poor	0.08
Urban	Developed land; sealed surface	0.652	V.Low	N/A - Other	0.00
Urban	Developed land; sealed surface	0.3159	V.Low	N/A - Other	0.00
Urban	Introduced shrub	0.0145	Low	Condition Assessment N/A	0.03
Urban	Introduced shrub	0.0032	Low	Condition Assessment N/A	0.01
Urban	Other green roof	0.0155	Low	Condition Assessment N/A	0.03
Woodland and forest	Other woodland; mixed	0.1222	Medium	Poor	0.54
Individual trees	Urban tree	0.1497	Medium	Good	1.98
Individual trees	Urban tree	0.1425	Medium	Moderate	1.14
***Individual trees are not included in the total site area to avoid double counting**				**TOTAL**	**3.95**

A breakdown of the baseline calculations for HeU is provided in Table 4.1 below:

Table 4.2 Baseline Hedgerow Units

Habitat Type	Length (Km)	Distinctiveness	Condition	Hedgerow Units
Native hedgerow	0.05	Low	Moderate	0.20
			TOTAL	**0.20**

The above tables have been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- The pre-development (baseline) habitats did not appear to have been subject to degradation prior to the condition assessment i.e. the default condition level of 'Good' has not had to be assigned to any habitat types.

- In accordance with the SBM User Guide, developed land; sealed surface, introduced shrub and other green roof have no condition assessment.
- Modified grassland in the form of low-cut well maintained amenity lawn areas was present towards the western extent of the site. The sward was estimated to comprise 90% grasses and 10% herbaceous species, at the time of the survey with approximately four species per m^2 and as such automatically is awarded 'Poor' condition (see Essential Criterion A see Appendix C).
- Ruderal/ephemeral was dominated by nettles *Urtica dioica* and occasional bramble *Rubus fruticosus agg*. This was assessed under the urban condition criteria (see Appendix C) and failed two of the three condition criteria as it does not have a varied habitat structure or floral diversity, it was absent from non-native invasive species so this was the only criterion awarded. As such it has been assigned a 'Poor' condition rating.
- Mixed scrub was present between the car park and hedgerow. Snowberry *Symphoricarpos album* was the dominant species here which is listed as an invasive species under the London Invasive Species Initiative (LISI). The scrub failed all five condition criteria (see Appendix C) and as such has been assigned a 'Poor' condition rating.
- Other woodland; mixed had a vegetation structure comprising canopy trees, four of which were native species, underlying shrub and saplings, and low-lying ground flora. The underlying shrub layer was dominated by a LISI species cherry laurel *Prunus laurocerasus*. Overall, the woodland achieved 25 of the 39 criteria (see Appendix C) which results in a condition of 'Poor'.
- Urban trees ranged from a score of Moderate to Good depending on whether they achieved between three and four of the condition criteria or over four (see Appendix C). All trees were oversailing vegetation and the majority had little to no impact from anthropogenic activity.
- Native hedgerow was a beech *Fagus sylvatica* hedgerow and has been assigned a condition score of 'Moderate' due to passing seven out of ten criteria and not failing both parts of more than one criteria group (see Appendix C).

4.2 POST-DEVELOPMENT (PROPOSED)

Using the SBM calculation tool, the 'Proposed Site Layout' is predicted to deliver 4.70 HU and 0.25 HeU respectively, as shown in Tables 4.3 and 4.4 below.

Table 4.3 Post-Development Habitat Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Retained					
Grassland	Modified grassland	0.0109	Low	Poor	0.02
Heathland and shrub	Mixed scrub	0.0209	Medium	Poor	0.08
Urban	Developed land; sealed surface	0.0007	V.Low	N/A - Other	0.00
Urban	Developed land; sealed surface	0.3159	V.Low	N/A - Other	0.00

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Urban	Introduced shrub	0.0022	Low	Condition Assessment N/A	0.00
Enhanced					
Grassland	Modified grassland	0.0016	Low	Moderate	0.01
Heathland and shrub	Mixed scrub	0.0071	Medium	Moderate	0.05
Created					
Grassland	Modified grassland	0.0006	Low	Moderate	0.00
Grassland	Modified grassland	0.0456	Low	Moderate	0.31
Heathland and shrub	Mixed scrub	0.0517	Medium	Moderate	0.35
Urban	Developed land; sealed surface	0.5407	V.Low	N/A - Other	0.00
Urban	Artificial unvegetated, unsealed surface	0.0056	V.Low	N/A - Other	0.00
Urban	Introduced shrub	0.0319	Low	Condition Assessment N/A	0.06
Urban	Vegetated garden	0.0186	Low	Condition Assessment N/A	0.04
Urban	Vegetated garden	0.0016	Low	Condition Assessment N/A	0.00
Woodland and forest	Other woodland; mixed	0.0411	Medium	Poor	0.14
Individual trees	Urban tree	0.0489	Medium	Moderate	0.15
Individual trees	Urban tree	0.0041	Medium	Poor	0.01
Urban	Ground based green wall	0.0034425	Low	Moderate	0.01
***Urban trees and green walls are not included in the total site area to avoid double counting**				**TOTAL**	**4.70**

Table 4.4 Post-Development Hedgerow Units

Habitat Type	Length (Km)	Distinctiveness	Condition	Hedgerow Units
Retained				
Native hedgerow	0.05	Low	Moderate	0.20
Created				
Non-native and ornamental hedgerow	0.0255*	V.Low	Poor	0.02
Non-native and ornamental hedgerow	0.0262*	V.Low	Poor	0.03
***Rounded to the nearest 0.0000**			**TOTAL**	**0.25**

The above tables have been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- The metric calculation reflects area-based habitats and linear habitats as no river habitats are proposed within the post-development design.

Enhanced

- There is a parcel of existing modified grassland in 'Poor' condition which will be enhanced to 'Moderate' through the inclusion of new species increasing the species per m^2 and creation of a varied sward height, management of scrub/bracken to below 20% and absence of absence of non-native species.
- The snowberry will be removed from site and replaced native species or those of known value to UK wildlife, such as hazel *Corylus avellana*, hawthorn *Crataegus monogyna*, oval-leaved privet *Ligustrum ovalifolium*, field rose *Rosa arvensis*, rowan *Sorbus aucuparia*, black pine *Pinus nigra*, blackthorn *Prunus spinosa*. This can be managed to create glades and rides to create structural diversity. Overall, it can be enhanced to achieve at least three out of six criteria.

Created

- Developed land; sealed surface relates to all areas of hardstanding, building and impermeable surfaces within the proposed development design. The artificial unvegetated, unsealed surface has been assigned to areas that will have a linear hedgerow feature to avoid double counting. These habitats have a pre-set condition within the SBM and do not contribute any biodiversity units to the calculation.
- In accordance with the SBM User Guide, developed land; sealed surface, artificial unvegetated, unsealed surface, introduced shrub and vegetated gardens have no condition assessment.

- Modified grassland will comprise native species such as common bent *Agrostis capillaris*, brown bent *Agrostis vinealis,* sweet vernal-grass *Anthoxanthum odoratum*, crested dogstail *Cynosurus cristatus*, sheep's fescue *Festuca ovina*, red fescue *Festuca rubra,* crested hair-grass *Koeleria macrantha* and so will likely result in at least 7 species per m^2. The grassland will have pockets which will comprise a mixture of non-native and native structural shrubs, bulbs and herbaceous species which will provide a structural diversity. Overall, it is expected to achieve 'Moderate' condition.
- Mixed scrub will comprise native species or those of known value to UK wildlife hazel, hawthorn, oval-leaved privet, field rose, rowan, black pine, blackthorn. One side of the scrub will be the modified grassland above which will be managed to be varied heights and create that tall grassland habitat along the scrub edge. Overall, it is expected to achieve 'Moderate' condition.
- Other woodland; mixed habitat will have a tree, shrub and ground flora layer and will comprise approximately 50% native species. It is expected to achieve approximately 24 of the 39 criteria (see Appendix C) which results in a condition of 'Poor'.
- Urban trees will have a ratio of 2:1 native to non-native and as such three of the four individual trees have been assigned 'Moderate' condition which can achieve at least three of the condition criteria and the remaining one has been assigned 'Poor' which is predicted to achieve no more than two criteria.
- Vertical greening is proposed for the site, which under SBM is listed as a 'ground-based green wall'. This will be in the form of a vegetated retaining wall system hydroseeded with wildflower mix and it considered that it will likely meet two of the tree condition criteria as the wildflower mix will provide a variety of floral species and is unlikely to comprises non-native invasive species however will likely be uniform in its structure and not provide that structural diversity to meet the relevant criterion. Overall, it is expected to achieve 'Moderate' condition.
- 'Non-native and ornamental hedgerow' is automatically assigned a 'Poor' condition score in accordance with SBM User Guide.

5.0 EVALUATION AND DISCUSSION

Under the proposals, as set out in the 'Proposed Site Layout', and in the absence of additional enhancement measures and habitat creation, the development is predicted to deliver 4.70 HU, which is an increase of 0.75 HU. This corresponds to an equivalent 18.99% BNG. The development is predicted to deliver 0.25 HeU, which is an increase of 0.05 HeU. This corresponds to an equivalent 24.92% BNG. All BNG Trading Rules have also been satisfied. A copy of the SBM calculation tool outputs is provided alongside this report. The proposals are therefore in compliance with local and national planning policy (see Appendix D).

Table 5.1 below evaluates whether the habitat types that will be present post-development will contribute 'significant enhancements'.

Table 5.1 Significant Enhancements Evaluation

Criteria	Present/Absent	Comments
Habitats of medium or higher distinctiveness in the biodiversity metric (created)	Present	Through creation of other woodland; mixed and planting of urban trees.
Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development	Present	Low distinctiveness habitats equates to 0.30 HU compared to baseline of 0.18 HU.
Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development	Absent	Both pre and post development have very low, low and medium habitat distinctiveness.
Areas of habitat creation or enhancement which are significant in area relative to the size of the development	Absent	The largest area of greening is 0.0517 ha of mixed scrub creation which is between 5-6% of the site area.
Enhancements to habitat condition, for example from poor or moderate to good	Present	Other modified grassland to Moderate condition. Mixed scrub from Poor to Moderate condition.

The production of a Habitat Management and Monitoring Plan (HMMP) is appropriate to set out the actions required to manage and maintain the habitats to maximise their biodiversity value over the long term (30 years minimum).

Further qualitative ecological enhancement should ideally also be targeted on site through the provision of invertebrate habitat features (such as pollinator posts or bee bricks), bird boxes (such as for garden birds) and bat boxes, to help protect nationally and locally important species, including those specified in national , regional and local Biodiversity Action Plans.

6.0 SUMMARY AND CONCLUSIONS

In accordance with the Environment Act 2021, the National Planning Policy Framework and local policy (Appendix D), developments (with a few exemptions) have to deliver at least a 10% net gain in biodiversity, which should be evidenced through a complete BNGA using the SBM.

This BNGA has been completed to identify the pre-development (baseline) biodiversity value of the site and compare against the predicted post-development biodiversity value.

The pre-development baseline values are 3.95 HU and 0.20 HeU.

The 10% BNG targets are therefore 4.35 for HU, 0.22 for HeU, ideally delivered fully on-site.

The post-development design proposals are predicted to deliver 4.70 HU. This is a net gain of 0.75 HU (equivalent to + 18.99% for HU).

The post-development design proposals are predicted to deliver 0.25 HeU. This is a net gain of 0.05 HeU (equivalent to + 24.92% for HeU).

The design proposals do meet the BNG Trading Rules for all habitat types/distinctiveness levels.

The proposed development is predicted to deliver a significant BNG due to the creation of medium distinctiveness habitats such as other woodland; mixed and planting of urban trees. Therefore, a HMMP for the habitat retention/enhancement, creation and long term management over 30 years (minimum) will be required for submission to the Council. When these recommendations are adhered to, the proposals stand to be compliant with legislation and current planning policy.

Upon receiving planning permission, the submission of a BGP to the Council will be required. This BGP must include details of the proposed off-site BNG compensation, including the Biodiversity Gain Site Register Reference.

Qualitative habitat enhancement recommendations have also been given to further increase the ecological value of the scheme.

APPENDIX A APPENDIX A PRE-DEVELOPMENT (BASELINE) HABITAT MAP

Figure A.1 Pre-development (Baseline) Habitat Map

HAYES PARK WEST - BASELINE

Red Line Boundary

Individual tree Baseline

- Existing Medium Urban Tree
- Existing Small Urban Tree

Hedgerow Baseline

- Native hedgerow

Habitats Baseline

- Developed land; sealed surface
- Introduced shrub
- Mixed scrub
- Modified grassland
- Other green roof
- Other woodland; mixed
- Ruderal/Ephemeral

Google Satellite

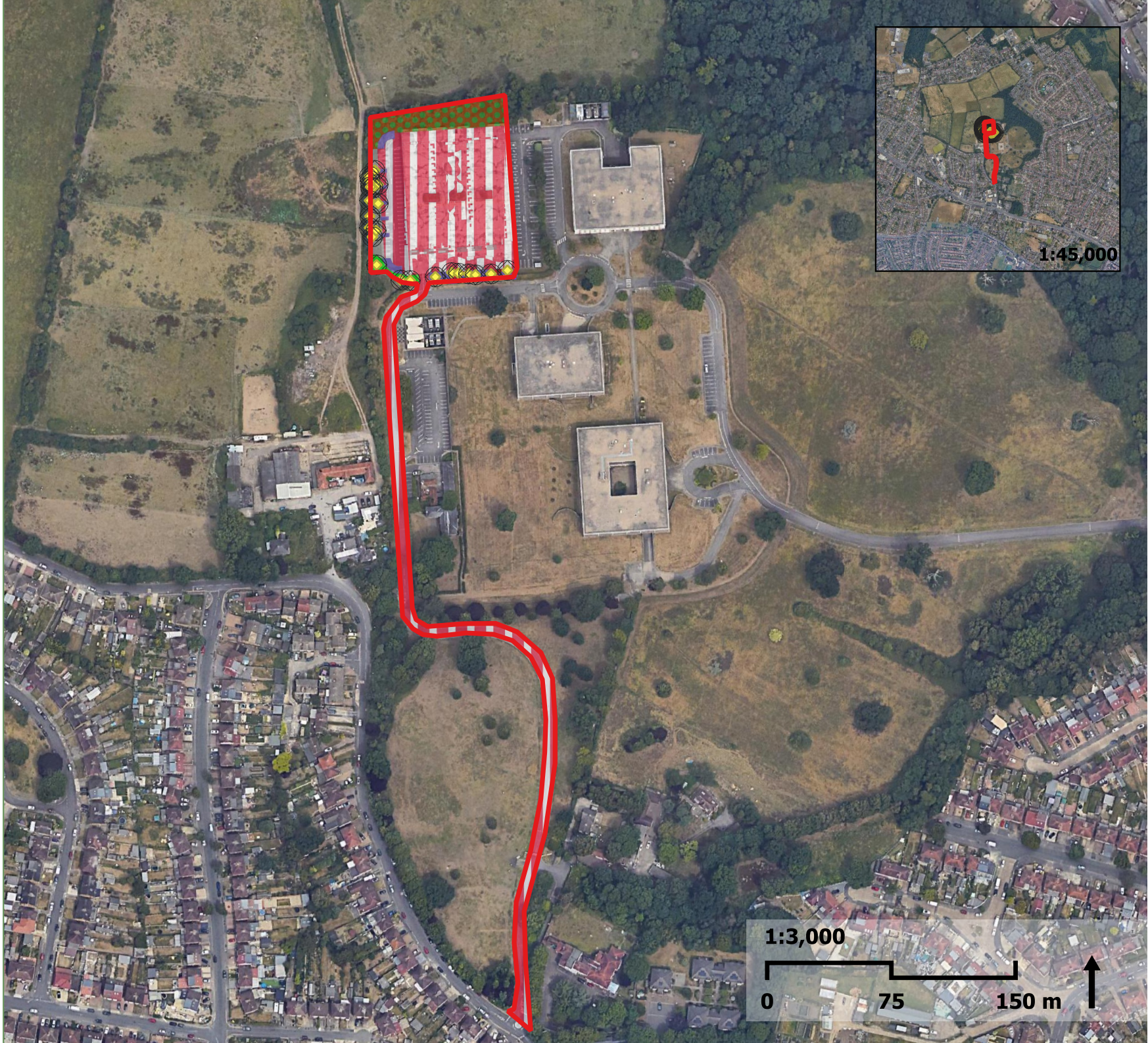
Title: Hayes Park West - Baseline

Drawn by: AR
Date: 21/11/2025

Reviewed by: LT
Date: 21/11/2025

Project number: 553349
Sources: Google Satellite

Greengage



APPENDIX B APPENDIX B POST-DEVELOPMENT HABITAT MAP

Figure B.1 Post-development Habitat Map

HAYES PARK WEST - PROPOSED

Red Line Boundary

Individual tree Proposed

- Proposed Small Urban Tree
- Retained Medium Urban Tree
- Retained Small Urban Tree

Hedgerows Proposed

- Non-native and ornamental hedgerow
- Native hedgerow

Habitats Proposed

- Artificial unvegetated unsealed surface
- Developed land; sealed surface
- Introduced shrub
- Mixed scrub
- Modified grassland
- Other woodland; mixed
- Vegetated garden

Google Satellite

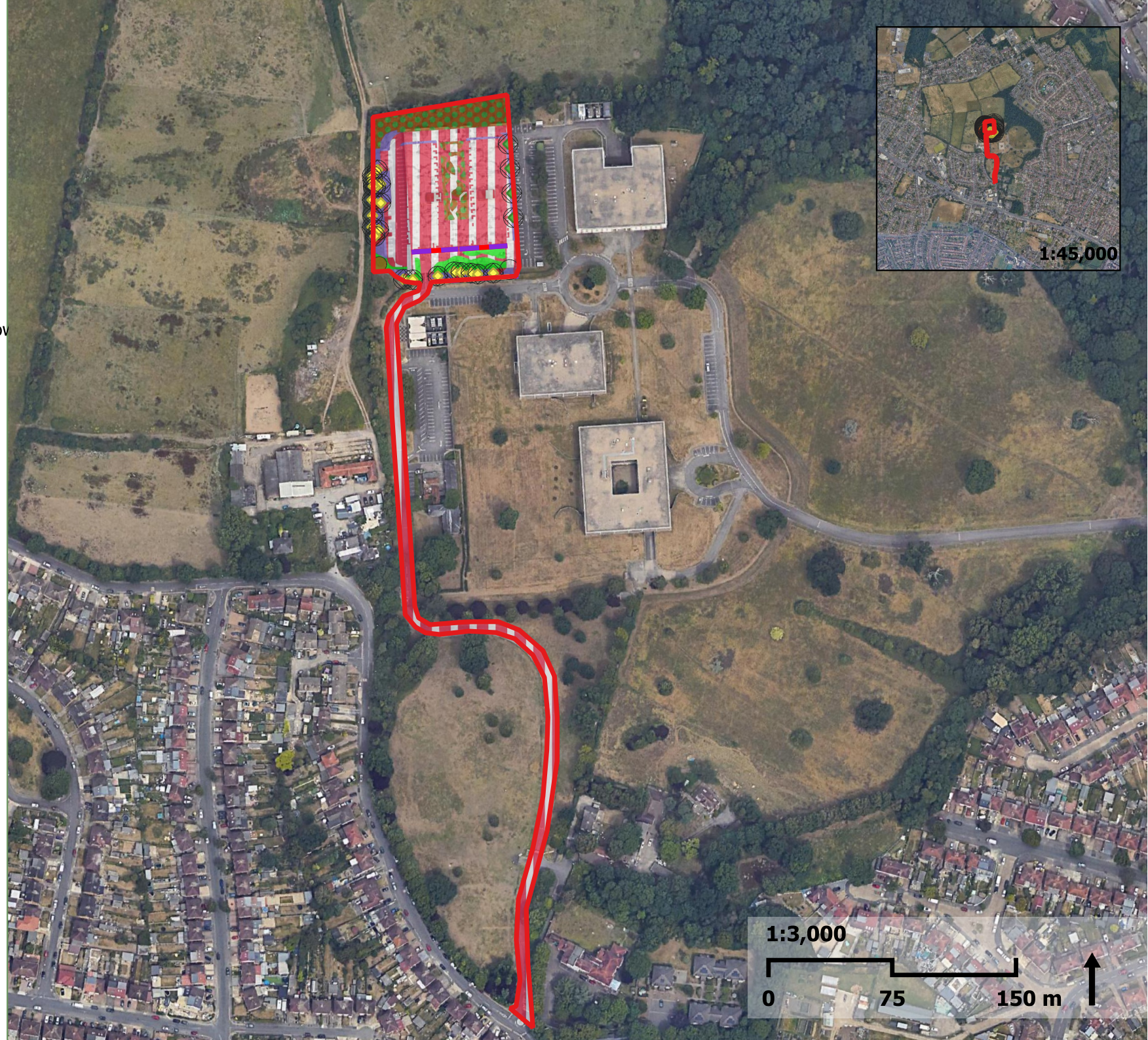
Title: Hayes Park West - Proposed

Drawn by: AR
Date: 21/11/2025

Reviewed by: LT
Date: 21/11/2025

Project number: 553349
Sources: Google Satellite

Greengage



APPENDIX C APPENDIX C CONDITION ASSESSMENTS

The highlighted green text below indicates which condition has been achieved for each habitat.

C.1 BASELINE HABITATS CONDITION ASSESSMENT

Modified Grassland

Table C.1 Modified grassland Condition Assessment

Condition Assessment Criteria		Criterion Passes (Yes or No)
A	There are 6-8 vascular plant species per m2 present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition.	No
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble Rubus fruticosus agg. may be present).	Yes
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities (Footnote 2).	Yes
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Yes
F	Cover of bracken Pteridium aquilinum is less than 20%.	Yes
G	There is an absence of invasive non-native plant species (Footnote 3) (as listed on Schedule 9 of WCA (Footnote 4)).	Yes
Essential criterion achieved (Yes or No)		No
Number of criteria passed		5

Table C.2 Modified Grassland Condition Results

Condition Assessment Result	Condition Assessment Score
Passes 6 or 7 criteria including passing essential criterion A	Good (3)
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)
Passes 3 or fewer criteria; OR Passes 4 -6 criteria (excluding criterion A)	Poor (1)
Footnotes	

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

Scrub

Table C.3 Scrub Condition Assessment

Condition Assessment Criteria		Mixed scrub
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range).1 - At least 80% of scrub is native, - There are at least three native woody species2, - No single species comprises more than 75% of the cover (except hazel Corylus avellana, common juniper Juniperus communis, sea buckthorn Hippophae rhamnoides (only in its restricted native range), or box Buxus sempervirens, which can be up to 100% cover).	N
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran3) shrubs are all present.	N
C	There is an absence of invasive non-native plant species4 (as listed on Schedule 9 of WCA5) and species indicative of suboptimal condition6 make up less than 5% of ground cover.	N
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or	N

Condition Assessment Criteria		Mixed scrub
	forbs present between the scrub and adjacent habitat.	
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	N
Number of criteria passed		0

Table C.4 Scrub Condition Assessment Results

Condition Assessment Result (out of 5 criteria)	Condition Assessment Score
Passes 5 criteria	Good (3)
Passes 3 or 4 criteria	Moderate (2)
Passes 2 or fewer criteria	Poor (1)

Urban - Sparsely Vegetated Land - Ruderal/Ephemeral

Table C.5 Ruderal/Ephemeral Condition Assessment

Condition Assessment Criteria		Pass
Core Criteria - must be assessed for all urban habitat types:		
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	N
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	N
C	Invasive non-native plant species (listed on Schedule 9 of WCA1) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area. Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	Y
Number of criteria passed		1

Table C.6 Ruderal/Ephemeral Condition Assessment Results

Condition Assessment Result	Condition Assessment Score
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):	
Passes all 3 criteria; AND Meets the requirements for Good condition within criterion C	Good (3)
Passes 2 of 3 core criteria; OR Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)
Passes 0 or 1 of 3 core criteria.	Poor (1)

Mixed woodland

Table C.7 Mixed Woodland Condition Assessment

Indicator	Good (3 Points)	Moderate (2 points)	Poor (1 point)	Score per indicator
A	Three age-classes1 present.	Two age-classes1 present.	One age-class1 present.	2
B	No significant browsing damage evident in woodland2.	Evidence of significant browsing pressure is present in less than 40% of whole woodland2.	Evidence of significant browsing pressure is present in 40% or more of whole woodland2.	3
C	No invasive species3 present in woodland.	Rhododendron Rhododendron ponticum or cherry laurel Prunus laurocerasus not present, and other invasive species3 <10% cover.	Rhododendron or cherry laurel present, or other invasive species3 ≥10% cover.	2 presence of cherry laurel
D	Five or more native tree or shrub species4	Three to four native tree or shrub species4	Two or less native tree or shrub species4	2 Oak, Ash, hornbeam, field maple

Indicator	Good (3 Points)	Moderate (2 points)	Poor (1 point)	Score per indicator
	found across woodland parcel.	found across woodland parcel.	across woodland parcel.	
E	>80% of canopy trees and >80% of understory shrubs are native5.	50 - 80% of canopy trees and 50 - 80% of understory shrubs are native5.	<50% of canopy trees and <50% of understory shrubs are native5.	2
F	"10 - 20% of woodland has areas of temporary open space6. Unless woodland is <10ha, in which case 0 - 20% temporary open space is permitted7."	21 - 40% of woodland has areas of temporary open space6.	"<10% or >40% of woodland has areas of temporary open space6.	2
G	All three classes present in woodland8; trees 4 - 7 cm Diameter at Breast Height (DBH), saplings and seedlings or advanced coppice regrowth.	One or two classes only present in woodland8.	No classes or coppice regrowth present in woodland8.	2
H	Tree mortality 10% or less, no pests or diseases and no crown dieback9.	11% to 25% tree mortality and or crown dieback or low-risk pest or disease present9.	Greater than 25% tree mortality and or any high-risk pest or disease present9.	2
I	Recognisable NVC plant community10 at ground layer present, strongly characterised by ancient woodland flora specialists.	Recognisable woodland NVC plant community10 at ground layer present.	No recognisable woodland NVC plant community10 at ground layer present.	1

Indicator	Good (3 Points)	Moderate (2 points)	Poor (1 point)	Score per indicator
J	Three or more storeys across all survey plots, or a complex woodland11.	Two storeys across all survey plots11.	One or less storey across all survey plots11.	2
K	Two or more veteran trees12 per hectare.	One veteran tree12 per hectare.	No veteran trees12 present in woodland.	I
L	50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, branch stubs and stumps, or an abundance of small cavities13.	Between 25% and 50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities13.	Less than 25% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities13.	2
M	No nutrient enrichment or damaged ground evident14.	Less than 1 hectare in total of nutrient enrichment across woodland area, and or less than 20% of woodland area has damaged ground14.	1 hectare or more of nutrient enrichment, and or 20% or more of woodland area has damaged ground14.	2
Number of criteria passed				25 out of 39

Table C.8 Mixed Woodland Condition Assessment Results

Condition Assessment Result	Condition Assessment Score
Total score >32 (33 to 39)	Good (3)
Total score 26 to 32	Moderate (2)
Total score <26 (13 to 25)	Poor (1)

Individual Trees - Urban Trees

Table C.9 Urban Trees Condition Assessment

Condition Assessment Criteria		Pass	Pass	Pass	Pass	Pass
A	The tree is a native species (or more than 70% within the block are native species).	Y	N	N	Y	Y
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y	N	Y	N	Y
C	The tree is mature (or more than 50% within the block are mature).	N	N	N	N	N
D	There is little or no evidence of an adverse impact on tree health by anthropogenic 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.	Y	Y	Y	Y	Y
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	N	Y	N	N	Y
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	Y	Y	Y	Y
Number of criteria passed		4	3	3	3	4

Table C.10 Urban Trees Condition Assessment Results

Condition Assessment Result	Condition Assessment Score
Passes 5 or 6 of 6 criteria	Good (3)
Passes 3 or 4 of 6 criteria	Moderate (2)
Passes 2 or fewer of 6 criteria	Poor (1)

Urban - Other Green Roof

No assessment is required for this habitat as the condition is fixed within the SBM as N/A.

Urban - Developed Land; Sealed Surface

No assessment is required for this habitat as the condition is fixed within the SBM as N/A.

Urban - Introduced Shrub

No assessment is required for this habitat as the condition is fixed within the SBM as N/A.

C.2 POST DEVELOPMENT

Modified Grassland

Table C.11 Modified Grassland Condition Assessment

Condition Assessment Criteria		
A	There are 6-8 vascular plant species per m2 present, including at least 2 forbs (This may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m2 (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high or very high distinctiveness, please use the relevant condition sheet.	Y
B	Sward height is varied (at least 20% of the sward is less than 7cm and at least 20% is more than 7cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Y
C	Some scattered scrub (including bramble Rubus fruticosus agg.) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Y
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	N
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)2.	N
F	Cover of bracken Pteridium aquilinum is less than 20%.	Y
G	There is an absence of invasive non-native plant species3 (as listed on Schedule 9 of WCA4).	Y
Number of criteria passed		5

Table C.12 Modified Grassland Condition Assessment Results

Condition Assessment Result (out of 7 criteria)	Condition Assessment Score
Passes 6 or 7 criteria including passing essential criterion A	Good (3)

Condition Assessment Result (out of 7 criteria)	Condition Assessment Score
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)
Passes 3 or fewer criteria; OR Passes 4-6 criteria (excluding criterion A)	Poor (1)

Scrub

Table C.13 Scrub Condition Assessment

Condition Assessment Criteria		Enhanced	Created
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range).1 - At least 80% of scrub is native, - There are at least three native woody species2, - No single species comprises more than 75% of the cover (except hazel Corylus avellana, common juniper Juniperus communis, sea buckthorn Hippophae rhamnoides (only in its restricted native range), or box Buxus sempervirens, which can be up to 100% cover).	Y	Y
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran3) shrubs are all present.	N	N
C	There is an absence of invasive non-native plant species4 (as listed on Schedule 9 of WCA5) and species indicative of suboptimal condition6 make up less than 5% of ground cover.	Y	Y
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	N	Y
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Y	N

Condition Assessment Criteria	Enhanced	Created
Number of criteria passed	3	3

Table C.14 Scrub Condition Assessment Results

Condition Assessment Result (out of 5 criteria)	Condition Assessment Score
Passes 5 criteria	Good (3)
Passes 3 or 4 criteria	Moderate (2)
Passes 2 or fewer criteria	Poor (1)

Mixed woodland

Table C.15 Mixed Woodland Condition Assessment

Indicator	Good (3 Points)	Moderate (2 points)	Poor (1 point)	Score per indicator
A	Three age-classes1 present.	Two age-classes1 present.	One age-class1 present.	1
B	No significant browsing damage evident in woodland2.	Evidence of significant browsing pressure is present in less than 40% of whole woodland2.	Evidence of significant browsing pressure is present in 40% or more of whole woodland2.	3
C	No invasive species3 present in woodland.	Rhododendron Rhododendron ponticum or cherry laurel Prunus laurocerasus not present, and other invasive species3 <10% cover.	Rhododendron or cherry laurel present, or other invasive species3 ≥10% cover.	3
D	Five or more native tree or	Three to four native tree or	Two or less native tree or	2 *Pinus sylvestris, Populus tremula,*

Indicator	Good (3 Points)	Moderate (2 points)	Poor (1 point)	Score per indicator
	shrub species4 found across woodland parcel.	shrub species4 found across woodland parcel.	shrub species4 across woodland parcel.	*Betula pubescens, and Sambucus nigra.*
E	>80% of canopy trees and >80% of understory shrubs are native5.	50 - 80% of canopy trees and 50 - 80% of understory shrubs are native5.	<50% of canopy trees and <50% of understory shrubs are native5.	1
F	"10 - 20% of woodland has areas of temporary open space6. Unless woodland is <10ha, in which case 0 - 20% temporary open space is permitted7."	21 - 40% of woodland has areas of temporary open space6.	"<10% or >40% of woodland has areas of temporary open space6.	1
G	All three classes present in woodland8; trees 4 - 7 cm Diameter at Breast Height (DBH), saplings and seedlings or advanced coppice regrowth.	One or two classes only present in woodland8.	No classes or coppice regrowth present in woodland8.	1
H	Tree mortality 10% or less, no pests or diseases and no crown dieback9.	11% to 25% tree mortality and or crown dieback or low-risk pest or disease present9.	Greater than 25% tree mortality and or any high-risk pest or disease present9.	3
I	Recognisable NVC plant community10 at ground layer present, strongly	Recognisable woodland NVC plant community10 at	No recognisable woodland NVC plant community10 at	1

Indicator	Good (3 Points)	Moderate (2 points)	Poor (1 point)	Score per indicator
	characterised by ancient woodland flora specialists.	ground layer present.	ground layer present.	
J	Three or more storeys across all survey plots, or a complex woodland11.	Two storeys across all survey plots11.	One or less storey across all survey plots11.	3
K	Two or more veteran trees12 per hectare.	One veteran tree12 per hectare.	No veteran trees12 present in woodland.	I
L	50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, branch stubs and stumps, or an abundance of small cavities13.	Between 25% and 50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities13.	Less than 25% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities13.	1
M	No nutrient enrichment or damaged ground evident14.	Less than 1 hectare in total of nutrient enrichment across woodland area, and or less than 20% of woodland area has damaged ground14.	1 hectare or more of nutrient enrichment, and or 20% or more of woodland area has damaged ground14.	1
Number of criteria passed				24 out of 39

Condition Assessment Result	Condition Assessment Score
Total score >32 (33 to 39)	Good (3)
Total score 26 to 32	Moderate (2)
Total score <26 (13 to 25)	Poor (1)

Individual Trees - Urban Trees

Table C.16 Urban Trees Condition Assessment

Condition Assessment Criteria		Proposed Native Trees Score	Proposed Non-Native Trees Score
A	The tree is a native species (or more than 70% within the block are native species).	Y	N
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y	Y
C	The tree is mature (or more than 50% within the block are mature).	N	N
D	There is little or no evidence of an adverse impact on tree health by anthropogenic 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.	N	N
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	N	N
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	Y
		3	2

Table C.17 Urban Trees Condition Assessment Results

Condition Assessment Result	Condition Assessment Score
Passes 5 or 6 of 6 criteria	Good (3)
Passes 3 or 4 of 6 criteria	Moderate (2)
Passes 2 or fewer of 6 criteria	Poor (1)

Urban - Ground Based Green Wall

Table C.18 Ground Based Green Wall Condition Assessment

Condition Assessment Criteria		Pass
Core Criteria - must be assessed for all urban habitat types:		
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	N
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Y
C	Invasive non-native plant species (listed on Schedule 9 of WCA1) and others which are to the detriment of native wildlife (using professional judgement)2 cover less than 5% of the total vegetated area3. Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	Y

Condition Assessment Result	Condition Assessment Score
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):	
Passes all 3 criteria; AND Meets the requirements for Good condition within criterion C	Good (3)
Passes 2 of 3 core criteria; OR Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)
Passes 0 or 1 of 3 core criteria.	Poor (1)

APPENDIX D RELEVANT LEGISLATION AND POLICY

D.1 LEGISLATION

The BNGA has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:

- UK Government's 25 Year Environment Plan (DEFRA, 2018);
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (DEFRA, 2011);
- National Planning Policy Framework (NPPF) (MHCLG, 2023);
- The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006);
- The Environment Act (DEFRA, 2021); and
- Hillingdon Local Plan
- The London Plan

The Environment Act, 2021

Under the Environment Act, 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of off-site compensation, or the purchase of statutory credits.

The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the Council.

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the Council to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

Under the Act, the enhancements must be maintained for at least 30 years.

D.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2024[16] sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

Regional

The London Plan[17]

Policy G1 Green infrastructure

A. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.

B. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

C. Development Plans and Opportunity Area Planning Frameworks should:

   1. identify key green infrastructure assets, their function and their potential function
   2. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

D. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy G5 Urban greening

1. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

E. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. (excluding B2 and B8 uses).

F. Existing green cover retained on-site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

Policy G6 Biodiversity and access to nature

2. Sites of Importance for Nature Conservation (SINCs) should be protected.

G. Boroughs, in developing Development Plans, should:

   1. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks

2. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
3. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
4. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
5. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

H. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
   1. avoid damaging the significant ecological features of the site
   2. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
   3. deliver off-site compensation of better biodiversity value.

I. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

J. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

1. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.

K. In their Development Plans, boroughs should:
   1. Protect 'veteran' trees and ancient woodland where these are not already part of a protected site
   2. Identify opportunities for tree planting in strategic locations

L. Development proposals should ensure that, wherever possible, existing trees of quality are retained [Category A and B]. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

London Environment Strategy 2018[18]

The Mayor's Environment Strategy was published in May 2018. This document sets out the strategic vision for the environment throughout London. Although not primarily a planning

guidance document, it does set strategic objectives, policies and proposals that are of relevance to the delivery of new development in a planning context, including:

Objective 5.1 Make more than half of London green by 2050

Policy 5.1.1 Protect, enhance and increase green areas in the city, to provide green infrastructure services and benefits that London needs now.

This policy states:

"New development proposals should avoid reducing the overall amount of green cover and, where possible, seek to enhance the wider green infrastructure network to increase the benefits this provides. […] New developments should aim to avoid fragmentation of existing green space, reduce storm water run-off rates by using sustainable drainage, and include new tree planting, wildlife-friendly landscaping, or features such as green roofs to mitigate any unavoidable loss".

This supports the 'environmental net gain' approach promoted by government in the 25 Year Environment Plan.

Proposal 5.1.1.d The London Plan includes policies to green streets and buildings, including increasing the extent of green roofs, green walls and sustainable drainage.

Objective 5.2 conserving and enhancement wildlife and natural habitats

Policy 5.2.1 Protect a core network of nature conservation sites and ensure a net gain in biodiversity

This policy requires new development to include new wildlife habitat, nesting and roosting sites, and ecologically appropriate landscaping will provide more resources for wildlife and help to strengthen ecological corridors. It states:

"Opportunities should be sought to create or restore priority habitats (previously known as UK Biodiversity Action Plan habitats) that have been identified as conservation priorities in London [and] all land managers and landowners should take BAP priority species into account".

Local

Hillingdon Local Plan: Part 1[19]

Policy EM7: Biodiversity and Geological Conservation

The Council will review all the Borough grade Sites of Importance for Nature Conservation (SINCs). Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority.

Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:

1. The conservation and enhancement of the natural state of: Harefield Gravel Pits Colne Valley Regional Park Fray's Farm Meadows Harefield Pit

M. The protection and enhancement of all Sites of Importance for Nature Conservation. Sites with Metropolitan and Borough Grade 1 importance will be protected from any adverse impacts and loss. Borough Grade 2 and Sites of Local Importance will be protected from loss with harmful impacts mitigated through appropriate compensation.

N. The protection and enhancement of populations of protected species as well as priority species and habitats identified within the UK, London and the Hillingdon Biodiversity Action Plans.

O. Appropriate contributions from developers to help enhance Sites of Importance for Nature Conservation in close proximity to development and to deliver/ assist in the delivery of actions within the Biodiversity Action Plan.

P. The provision of biodiversity improvements from all development, where feasible.

Q. The provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.

R. The use of sustainable drainage systems that promote ecological connectivity and natural habitats.

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