Aval Consulting Group.

Biodiversity Net Gain Assessment

212 Swakeleys Rd, Ickenham, Uxbridge, UB10 8AY

Iftikhar Ahmad

January 2025

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93467B

Project Information

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1 Introduction

1.1 Overview

Iftikhar Ahmad ('the client') is seeking consent for a Proposed Development at 212 Swakeleys Rd, Ickenham, Uxbridge, UB10 8AY (thereafter referred to as the site), which is within the London Borough of Hillingdon (LBH).

AVAL Consulting Group Limited (ACGL) was instructed by the client to produce a Biodiversity Net Gain Assessment to accompany the planning application to the LBH for consent to undertake the proposed work. Major developments are required to submit a Biodiversity Net Gain Assessment demonstrating biodiversity enhancements that contribute to the objectives of the latest LBH Local Plan.

The proposal is for the erection of new dwelling with associated parking and landscaping following demolition of existing dwelling.

A Biodiversity Net Gain Assessment has been prepared to assess the site's feasibility and consider improvements to the ecology of both current and proposed habitats.

The report was prepared by Brydie Stacey (MSc Conservation Ecology – CIEEM accredited).

Local Authorities are tasked with determining new development and local planning applications against a wide range of social, economic and environmental criteria. The purpose of this report is to assess whether the development proposal is compliant with the relevant local policies in terms of ecological impact and whether the Proposed Development will result in a biodiversity net gain.

This assessment has been carried out in accordance with good practice guidelines, including the National Planning Policy Framework (2023) and applicable local supplementary guidance.

The remainder of this report is presented in the following order:

- Section 2: Relevant national, regional, and local applicable policies;
- Section 3: Biodiversity Net Gain;
- Section 4: Conclusion.

1.2 Objectives

- Assess the proposed landscape plans and compare this to the current habitats on site to see if the proposed residential development will result in a biodiversity net gain.
- Demonstrate the sites biodiversity loss or gain through habitat impact assessment calculations.

2 Legislation and Policy

This section summarises the relevant National and Local legislative and policy background, statutory and non-statutory guidelines relevant to the potential development.

2.1 National Policy

2.1.1 National Planning Policy (December 2023)

The principal national planning policy guidance with respect to the potential development is the National Planning Policy Framework (NPPF). The most recent update of the NPPF was published in December 2023 by the Department for Communities and Local Government (DCLG). This guidance sets out the Government's planning policies for England and how they are expected to be applied. Three dimensions to sustainable development have been identified in the NPPF: economic, social, and environmental.

The NPPF Section 180 states that:

"*Planning policies and decisions should contribute to and enhance the natural and local environment by:*

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

Section 181 states that:

"*Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries."*

Section 182 states that:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads[63]. The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."

Section 183 states that:

"When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development[64] other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."

Section 185 states that:

"To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and steppingstones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

Section 186 states that:

"*When determining planning applications, local planning authorities should apply the following principles:*

a) 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;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."

Section 188 states that:

"The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site."

2.1.1 Relevant National Planning Practice Guidance (NPPG, 2016)

NPPG is a web-based resource which brings together planning guidance on various topics into one place. It was launched in March 2014 and coincided with the cancelling of the majority of Government Circulars which had previously given guidance on many aspects of planning.

The guidance note on 'Natural Environment' explains key issues in implementing policy to protect and enhance the natural environment, including local requirements. This has been referred to when preparing this report. It states that*:*

"Planning authorities need to consider the potential impacts of development on protected and priority species, and the scope to avoid or mitigate any impacts when considering site allocations or planning applications. Guidance on the law affecting Habitats Sites, protected species and SSSIs.

Natural England has issued standing advice on protected species. A protected species mitigation licence from Natural England may be required before any work can start."

The PPG also states that:

"Information on biodiversity and geodiversity impacts and opportunities needs to inform all stages of development (including site selection and design, pre-application consultation and the application itself). An ecological survey will be necessary in advance of a planning application if the type and location of development could have a significant impact on biodiversity and existing information is lacking or inadequate. Pre-application discussions can help to scope whether this is the case and, if so, the survey work required.

Even where an Environmental Impact Assessment is not needed, it might still be appropriate to undertake an ecological survey, for example, where protected species may be present or where biodiverse habitats may be lost.

As with other supporting information, local planning authorities should require ecological surveys only where clearly justified. Assessments should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity. Further guidance on information requirements is set out in making an application."

Biodiversity net gain is mentioned in the PPG and states that:

"The National Planning Policy Framework encourages net gains for biodiversity to be sought through planning policies and decisions. Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. It may help local authorities to meet their duty under Section 40 of the Natural Environment and Rural Communities Act 2006."

2.2 Local Policy

2.2.1 The Hillingdon Local Plan: Part 1- Strategic Policies (2011-2026)

Hillingdon's Local Plan was adopted in November 2012. The plan sets out the Council's key elements of the planning framework for the district through to 2026.

The purpose of the Plan is to steer and shape development for the next 15 years. Guidelines for decisions about planning applications and allocation for specific sites are not included.

Policy EM7 Biodiversity and Geological Conservation states:

"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*

2. 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.

3. 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.

4. 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.

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

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

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

Implementation of Policy EM7 - how we will achieve this

The Council will implement Policy EM7 by:

- *Raising the profile of the biodiversity and geological interests both locally, regionally and nationally.*
- *Supporting, improving and managing biodiversity interests and local geological sites through the planning process.*
- *Protecting and where feasible extend habitat and improve ecosystems throughout the borough and to areas beyond, by maintaining existing trees, native vegetation (adaptable to climate change) and open space and provide new areas of such London Borough of Hillingdon 116 Hillingdon Local Plan: Part 1 - Strategic Policies (Adopted November 2012) 8 Core Policies - Environmental Improvement vegetation (including the linking of existing fragmented areas) for the benefit of wildlife in accordance with the local Biodiversity Action Plan.*
- *Seeking and pooling contributions in accordance with the Planning Obligations Supplementary Planning Document towards the implementation of actions contained within Hillingdon's Biodiversity Action Plan.*
- *Working with partners, private landowners and other utility providers to achieve multi-functional use of land use that promotes and enhances biodiversity, adds to the green grid or achieves other open space outcomes, including improved accessibility.*
- *Working with local community groups/ partners when reviewing the Biodiversity Action Plan*

Monitoring of Policy EM7 - how we will measure success

- *Monitoring of Policy EM7 will be through the Annual Monitoring Report with a specific link to:*
    - *E2 (Core) Indicator: Change in areas of biodiversity importance including; change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance. Target: i) Preserve the area of wildlife habitats ii) Minimise loss of designated areas to development (or any other target set by Government).*
- *Number of biodiversity and geological conservation sites lost to development.*
- *Number of applications refused on biodiversity or geological interest grounds.*
- *Number of local sites actively managed.*

- *Number of additional nature conservation sites designated.*
- *Implementation of Hillingdon's Biodiversity Action Plan."*

2.3 Summary

It is considered that the environmental and ecological priorities for development are to reduce the negative impacts on the environment, maximise sustainable development, encourage biodiversity.

3 Existing Site Conditions

3.1 Habitats on site

Habitat types were determined during a site visit carried out on the 29th of July 2024. The existing site currently consists of buildings (u1b5), other developed land (u1b6), built linear features (u1e), fence (612), modified grassland (g4), mixed scrub (h3h) and trees (200) as shown in Figures 3.1.

The existing plan can be found in Appendix A, alongside a UKHab map in Appendix D. A Conditions Assessment is not applicable to habitat types present on-site.

Figure 3.1 – Existing Site (Aval, 2024)

4 Biodiversity Net Gain

4.1 Calculation

As mentioned in previous sections, major development is required to submit an ecology assessment demonstrating the sites biodiversity loss or gain using a Biodiversity Metric.

Biodiversity Net Gain is calculated using the Statutory Biodiversity Metric tool to determine if the Proposed Development will result in a habitat biodiversity net loss or gain. The tool helps to calculate the biodiversity value of a site before and after the Proposed Development.

The percentage net change by measuring many factors including:

- The existing habitats on site;
- How distinctive the habitats are on site;
- Habitat condition;
- Habitats to be retained and enhanced within the development;
- Habitats to be lost within the development;
- Any indirect negative impacts;
- Habitat creation on site; and
- Habitat enhancement.

The net change result is displayed as a percentage loss or a gain.

The site received an on-site net percentage change of 27.95% (Gain) for Habitat units with trading rules satisfied as a result of the Proposed Development which will incorporate vegetated garden. The proposed landscape plans can be found in Appendix B. Statutory Biodiversity Metric tool results can be found in Appendix C.

5 Conclusions

This report provides an assessment of the following potential key impacts associated with the construction and operational phases of the Proposed Development at 212 Swakeleys Rd, Ickenham, Uxbridge, UB10 8AY.

- Assess the proposed landscape plans and compare this to the current habitats on site to see if the proposed residential development will result in a biodiversity net gain; and
- Demonstrate the sites biodiversity loss or gain through habitat impact assessment calculations.

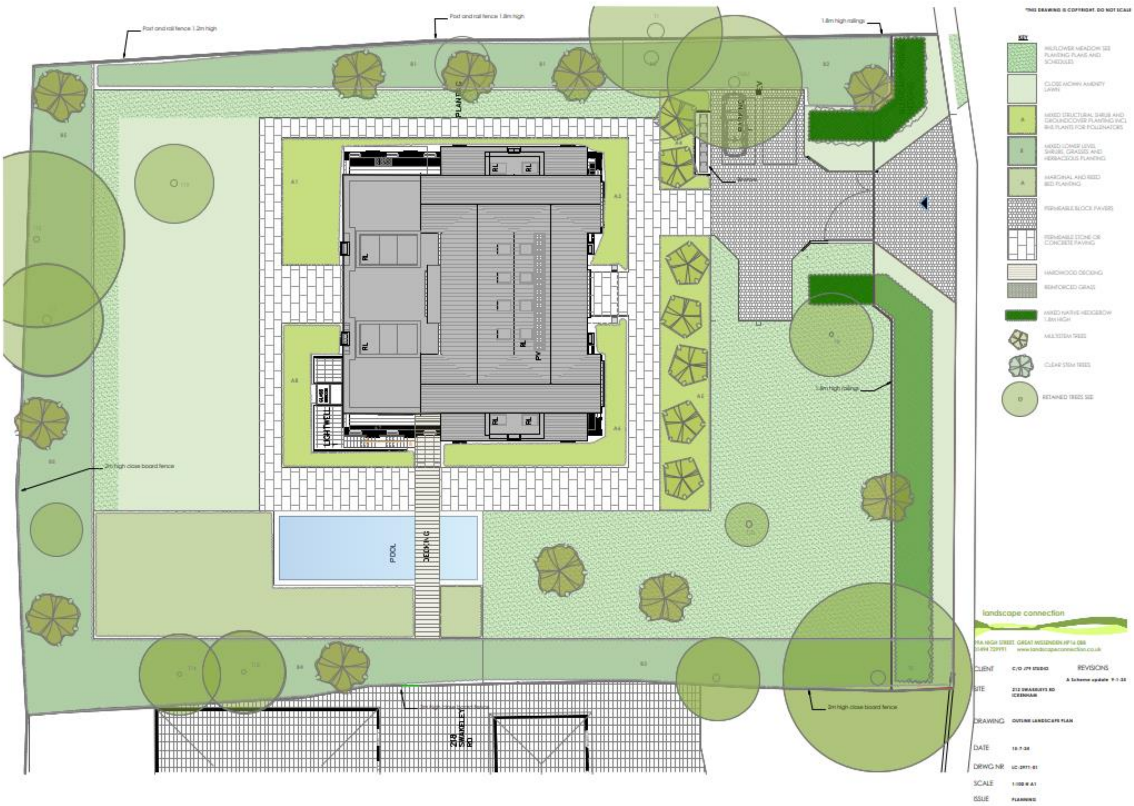
The scheme offers ecological improvements to the landscape through a vegetated garden to the front and rear of the dwelling. The proposed ecological improvements resulted in an on-site net percentage change 27.95% (Gain) for Habitat units with trading rules satisfied as a result of the Proposed Development. As a result, the Proposed Development presents many ecological benefits, and this is expected to attract and provide essential habitat for an array of fauna.

It can, therefore, be concluded that the Proposed Development is considered to comply with national, regional or local planning policies and offers ecological improvement to the site and surrounding area.

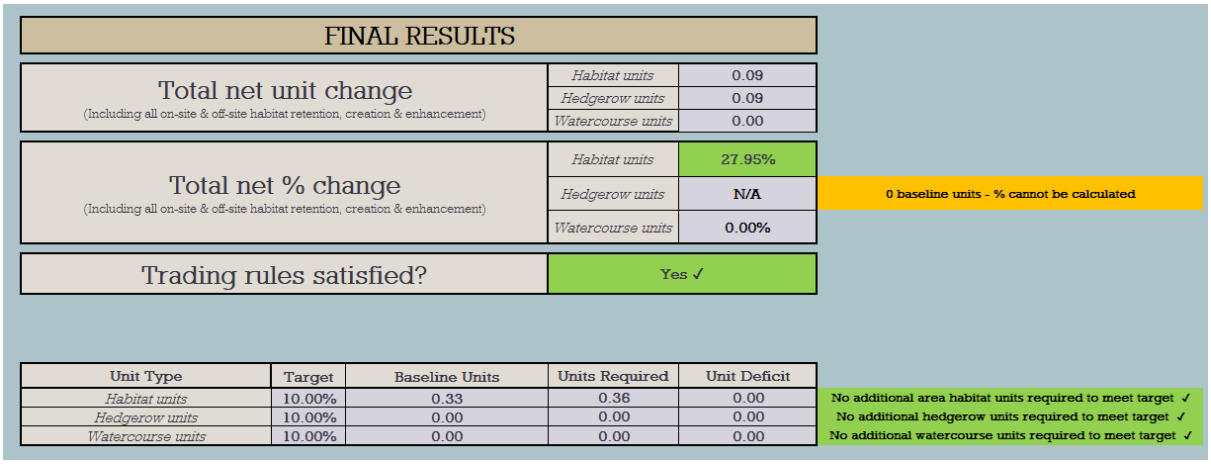
Appendices

Appendix A : Existing Site (obtained from GoogleMaps)

Appendix B : Proposed Site Plans (obtained from the client)



Appendix C : Biodiversity Net Gain Calculations



FINAL RESULTS			
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.09	
	Hedgerow units	0.09	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	27.95%	
	Hedgerow units	N/A	0 baseline units - % cannot be calculated
	Watercourse units	0.00%	
Trading rules satisfied?	Yes ✓		

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Habitat units	10.00%	0.33	0.36	0.00	No additional area habitat units required to meet target ✓
Hedgerow units	10.00%	0.00	0.00	0.00	No additional hedgerow units required to meet target ✓
Watercourse units	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓

Appendix D : UKHab Map