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16/11/2023

To Graham Eades,

### **Biodiversity Net Gain Feasibility Statement**

Project	77 Hilliard Road, Northwood Hills, HA6 1SL – Biodiversity Net Gain Feasibility Assessment
Client	Zoe Wilson & Michael Howard
Project Code	23-021
Document Ref.	23-021-BNG-FS

#### 1. Planning Policy and Legislation

- 1.1 The premise of biodiversity net gain is that developments contribute to an overall increase in biodiversity. This is underpinned by the National Planning and Policy Framework 2023 (NPPF) and the Environment Act 2021.
- 1.2 The introduction of mandatory biodiversity net gain has been delayed until January 2024 for large sites and April 2024 for small sites, with secondary legislation set to be released in November 2023. During the two-year transition phase between the introduction of the Environment Act and the implementation of mandatory BNG, planning authorities are preparing mechanisms to introduce their requirements for net gain.
- 1.3 The statutory requirement will be a minimum 10% for eligible developments, however, local planning policy may set requirements above and in addition to this minimum. Several policies influence the consideration of biodiversity net gain for developments within the Hillingdon Borough:

- Policy G6 Biodiversity and access to nature (part D) of The London Plan (Greater London Authority, 2021) stipulates that development proposals aim to leave biodiversity in a better state than before.
- Policy G5 of The London Plan requires that major developments contribute to urban greening. An interim target score of 0.4 has been set until the local borough has developed an Urban Greening Factor (UGF) through local policy.
- The adopted Hillingdon Local Plan – Part 1 (London Borough of Hillingdon, 2012) does not directly address the introduction of mandatory net gain, however, the Development Management Policies adopted in Part 2 of the Plan (London Borough of Hillingdon, 2020) do require the use of the approved DEFRA Metric for calculating biodiversity unit change.

## 2. Baseline Assessment

2.1 The baseline assessment was conducted on the 6<sup>th</sup> of November 2023 by Kate Williams, BSc, MSc (Species Identification & Survey Skills), AECOW, who has eight years' experience in ecological consultancy and habitat survey.

2.2 Habitat data was collected using the UK Habitat classification scheme version 2.0 (UKHab Ltd, 2023). Each habitat parcel was mapped using the fine scale mapping unit. Where applicable, condition assessments were undertaken for each habitat parcel using the condition sheets associated with the Biodiversity Metric 4.0 (Natural England, 2023).

2.3 A baseline habitat map was produced to determine the areas associated with each habitat parcel. Habitat information was translated into the metric to identify baseline value.

## 3. Results

3.1 The survey identified that the baseline habitat value for the site is zero. The only habitat type identified within the red line boundary was developed land with a sealed surface. A condition assessment is not applicable to this habitat type.

Habitat Type	Area (m <sup>2</sup> )	Distinctiveness	Condition	Strategic Significance	Biodiversity Value
Developed land; sealed surface	284	Very Low	N/A	Area/compensation not in local strategy/ no local strategy	0.00

3.2 A local nature recovery strategy (LNRS) is in the pipeline for the London area and is anticipated to be published by 2025. The assessment of strategic significance, therefore, has been assigned as 'no local strategy'.

3.3 No hedgerow or river habitat was identified through the survey. The two trees visible from satellite imagery of the site occur within adjacent land.

#### 4. Biodiversity Gain Opportunity

4.1 This site is likely to be exempt from mandatory biodiversity net gain. Section 3.1 of the Government's 2023 consultation response (DEFRA, 2023) identifies the scenarios likely to be exempt under secondary legislation (yet to be published) which includes:

- “development impacting habitat of an area below a ‘de minimis’ threshold of 25 metres squared, or 5m for linear habitats such as hedgerows”

4.2 The site is not covered by the definition of a major development under the NPPF and would therefore not be subject to the requirement for urban greening. Local policy does, however, encourage a net gain for all development.

4.3 The standard target of 10% is not possible to achieve for a zero baseline as a percentage increase on zero would still be zero. A bespoke strategy would need to be agreed with the local planning authority based on an increase in unit value. For a zero baseline, incorporation of any green space within the proposed development will result in a unit increase in biodiversity. This could be tree planting, creation of a garden, green roof or ground level planters.

4.4 A development can only claim a biodiversity net gain if it can demonstrate that the principles of the metric have been appropriately applied. One key principle requires the prioritisation of habitat retention or in this case habitat creation on site before resulting to offsite solutions. It is recommended, therefore, that green space be incorporated within the on-site baseline.

Kind regards,

Katherine Williams  
Principal Ecologist

#### References

DEFRA. (2023). *Consultation outcome. Government response and summary of responses*. Retrieved from <https://www.gov.uk/government/consultations/consultation-on-biodiversity-net-gain-regulations-and-implementation/outcome/government-response-and-summary-of-responses>

Department for Levelling Up, Housing & Communities. (2023). *National Planning Policy Framework*. London.

Greater London Authority. (2021). *The London Plan. The spatial development strategy for Greater London*.

London Borough of Hillingdon. (2012). *Local Plan: Part 1. Strategic Policies*.

London Borough of Hillingdon. (2020). *Local Plan Part 2. Development Management Policies*.

Natural England. (2023, 07 04). *Biodiversity Metric 4.0 - Technical Annex 1 - Condition Assessment Sheets and Methodology*. Retrieved from <https://publications.naturalengland.org.uk/publication/6049804846366720>

UKHab Ltd. (2023). *UK Habitat Classification Version 2.0*. Cheshire: UKHab Ltd.

Appendix 1 – Supporting photographs.

Image 1: Entranceway to property taken from access gate.	Image 2: Entranceway to property looking towards the road.
Image 3: View of open courtyard and workshop buildings.	Image 4: Example of internal structure space of former workshop
Image 5: Aerial view showing developed land covering the site.	



#### BASELINE HABITATS

- Red Line Boundary
- Developed land; sealed surface

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TQ 09819 90949

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