BIODIVERITY NET GAIN CALCUALTION

13 & 15 LANCASTER ROAD
UXBRIDGE
UB8 1AP

Client: Mark Thomas – Trustees of Uxbridge United Reformed Church Charity
Our reference: ECO3791b
Report date: 09 June 2025
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REPORT ISSUED IN ELECTRONIC FORMAT

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1.0 Survey and reporting

1.1 This report details the results of a Biodiversity Net Gain Calculation for a proposed development at 13 and 15 Lancaster Road, Uxbridge, Middlesex, UB8 1AP.

1.2 It has been undertaken using the Statutory Biodiversity Metric published by DEFRA on 29 November 2023 (updated in July 2024).

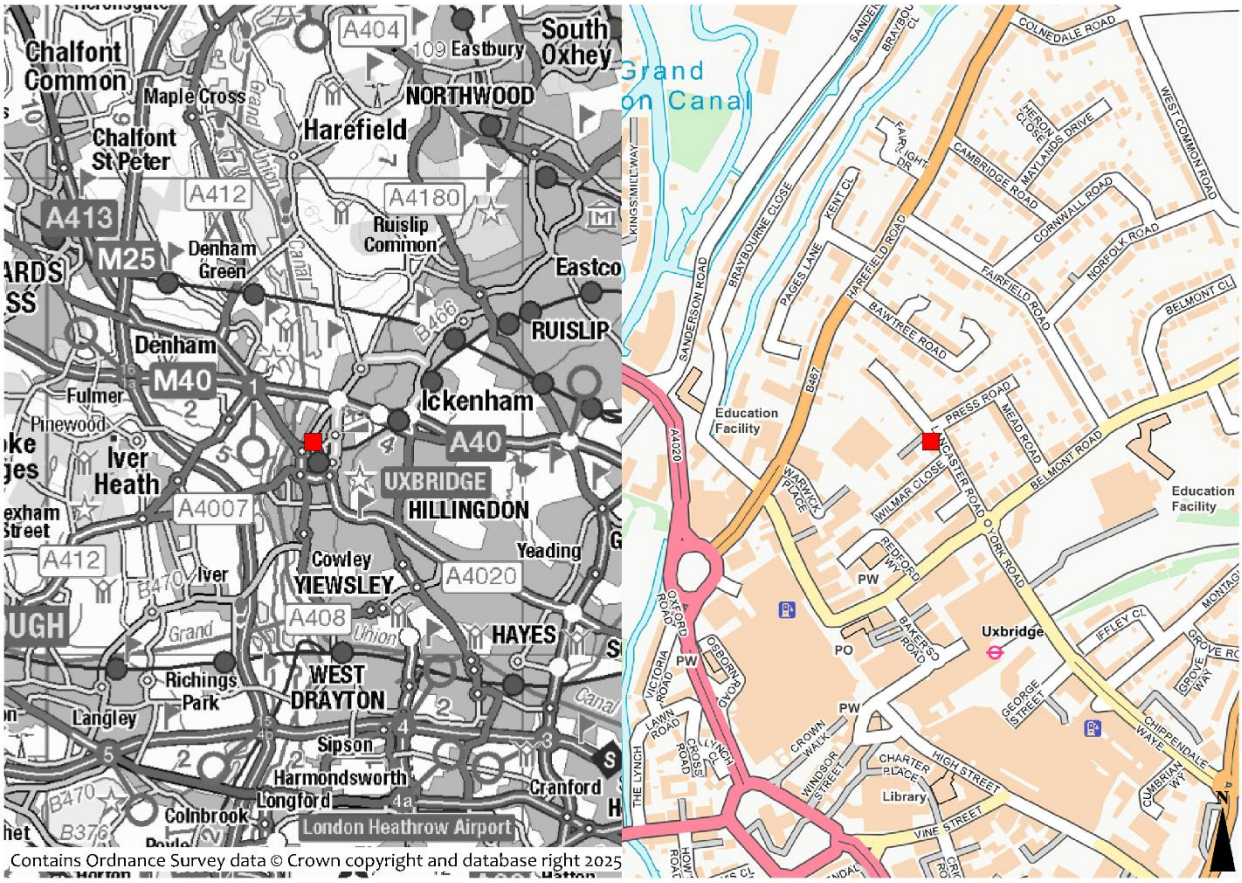
Application site

1.3 The application site is located south of the intersection between Lancaster Road and Press Road, two residential roads in central Uxbridge (Ordnance Survey Grid Reference TQ05608448, Figure 1).

1.4 It comprises a pair of semi-detached houses and their associated front and rear gardens.

1.5 The total area of the application site is approximately 0.051 hectares.

Figure 1 – Site location



Details of proposed works

1.6 It is proposed to demolish both houses and erect a new residential building - comprising four flats. Figure 2 shows the proposed site plan.

1.7 Two 'small' trees within the rear garden of 15 Lancaster Road will be removed to facilitate the development.

Survey to inform the assessment

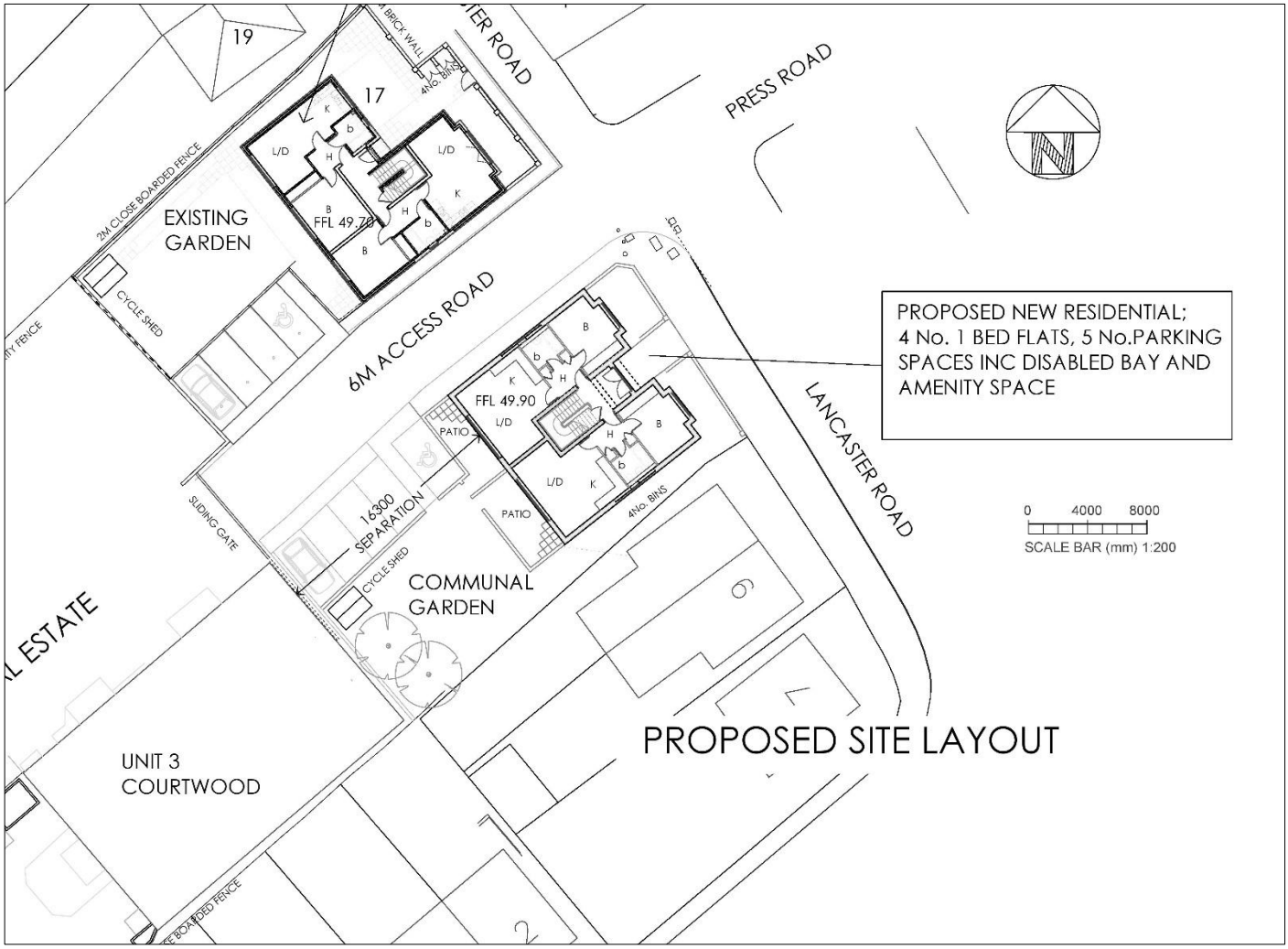
1.8 The assessment was based on an ecological survey, carried out on 29 April 2025.

Surveyor details

1.9 The survey was undertaken by Ryan Davies ACIEEM (senior ecologist) and Cherry Leung Qualifying CIEEM member (assistant ecologist) of GS Ecology Ltd.

1.10 Ryan holds a Natural England great crested newt survey licence (WML-CL08), a Natural England WML A34 Level 2 bat survey licence and is an associate member of the Chartered Institute of Ecology and Environmental Management with more than 10 years' experience as professional ecologist.

Figure 2 – Proposed site plan



2.0 Biodiversity net gain calculation

2.1 The Environment Act 2021 became law on 9 November 2021. It requires (through amendments to the Town and Country Planning Act 1990) all planning permissions in England, with some exemptions, to be granted subject to a new general pre-commencement condition that requires approval of a biodiversity gain plan.

2.2 This system is commonly referred to as Biodiversity Net Gain and it is a cornerstone of the government's 25 Year Environment Plan.

2.3 This became mandatory on 12 February 2024 for major applications and 2 April 2024 for minor applications.

2.4 Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out the minimum information that a planning application must be accompanied by (see Table 1 below).

2.5 It is worth noting that the minimum information does not require an assessment of post development biodiversity units. This is because this information would have to be provided in the Biodiversity Gain Plan when the biodiversity gain condition is discharged.

Table 1 – Statutory BNG minimum information requirements

Minimum information	Response for this application
1) Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;	Yes, if granted, this development would be subject to the biodiversity gain condition
2) The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate);	See completed Statutory Metric tool provided with this report.
3) Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;	29 April 2025 (date of the survey)
4) The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;	Provided with this report
5) A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have: - a statement to the effect that these activities have been carried out; - the date immediately before these activities were carried out; - the pre-development biodiversity value of the onsite habitat on this date; - the completed metric calculation tool showing the calculations, and - any available supporting evidence of this;	No activities have been carried out prior to the date of application that have resulted in the loss of onsite biodiversity value.
6) A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and	There are no irreplaceable habitats on the land to which the application relates
7) Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).	See plans in Appendix 2.

Degradation of habitats

2.6 There are special provisions for the calculation of the pre-development biodiversity value of onsite habitat when loss or impact to habitats (or 'degradation') has occurred prior to the submission of a planning application and Biodiversity Gain Plan in order to discourage the deliberate degradation of existing onsite habitats to reduce the pre-development biodiversity value.

2.7 For the Biodiversity Plan, Paragraph 6 of Schedule 7A of the Town and Country Planning Act 1990 makes provision relating to unauthorised degradation takes place, and Paragraph 6A of the 1990 Act makes provision relating to degradation taking place which is in accordance with a planning permission:

- Where unauthorised degradation of the onsite habitat has taken place on the land between 30 January 2020 and the date of relevant date, the biodiversity pre-development value of the onsite habitat should be calculated as the biodiversity value of the habitat on the date immediately before the carrying out of these degradation activities. The relevant date should therefore be set as a date immediately before these activities. Unauthorised degradation of onsite habitat is any degradation which is not in accordance with a previous planning permission.
- If activities to implement or in connection with a planning permission are carried out after 25 August 2023 that lower the biodiversity value of the onsite habitat, the pre-development biodiversity value of the onsite habitat is taken to be the biodiversity value immediately before the carrying out of the activities. The relevant date should therefore be set as a date immediately before these activities.

2.8 If there has been degradation and there is insufficient evidence about the biodiversity value of the onsite habitat immediately before the degradation, the pre-development biodiversity value of the onsite habitat must be taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it. This requirement must be applied to the calculation of pre-development biodiversity value in the metric tool, and the Biodiversity Gain Plan template asks for information regarding whether there has been prior habitat degradation.

2.9 Unauthorised degradation is defined in the environment act as

"activities on land on or after 30 January 2020 otherwise than in accordance with—

(i) planning permission, or

(ii) any other permission of a kind specified by the Secretary of State by regulations"

The Biodiversity Gain Hierarchy

2.10 Local Planning Authorities sometimes ask for confirmation that the Biodiversity Gain Hierarchy has been followed. The hierarchy and its effect for the purpose of the statutory framework for biodiversity net gain is set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This hierarchy (which does not apply to irreplaceable habitats) is described below:

(1) first, in relation to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity

metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and

(2) then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.

2.11 Planning authorities must take into account how the Biodiversity Gain Hierarchy has been applied and if it has not been applied the reason for that or absence of a reason when determining whether to approve the Biodiversity Gain Plan. If they decide not to approve the Plan they must give reasons for that stating the elements of the plan that are relevant to the determination.

2.12 The Biodiversity Gain Hierarchy has been designed for the purpose of the statutory framework for discharge of the Biodiversity Gain condition to reflect the habitat categories in the biodiversity metric and the type of ways that the objective of at least a 10% gain can be achieved.

2.13 The Biodiversity Gain Hierarchy is distinct from the mitigation hierarchy set out in paragraph 186(a) of the National Planning Policy Framework which states that a planning application should be refused if significant harm to biodiversity resulting from the development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for. How biodiversity net gain will be secured for a development may be relevant to consideration of the policy in the Framework, especially in relation to adequate mitigation and compensation.

The biodiversity gain condition

2.14 All planning applications will be approved subject to the biodiversity gain condition. The condition requires a Biodiversity Gain Plan (as a separate discharge of conditions application) to be submitted and approved by the planning authority to discharge the biodiversity gain condition prior to the commencement of development.

2.15 The Biodiversity Gain Plan can be submitted no earlier than the day after planning permission has been granted. It needs to include the following:

(1) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;

(2) the pre-development biodiversity value of the onsite habitat;

(3) the post-development biodiversity value of the onsite habitat;

(4) any registered off-site biodiversity gain allocated to the development and the biodiversity; and

(5) any biodiversity credits purchased for the development.

Purpose of this report

2.16 The purpose of this report is to provide the planning authority with the information required to determine the planning application in relation to BNG. It includes the

minimum information as set out in the Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 (see Table 1 above).

2.17 It also details the anticipated habitats (if known) after development and whether a 10% BNG will be achieved. If 10% BNG not be achieved, it provides possible options for doing this.

2.18 It is worth noting that National Planning policy Guidance reads:

> "The statutory framework for biodiversity net gain involves the discharge of the biodiversity gain condition following the grant of planning permission to ensure the objective of at least 10% net gain will be met for a development. The determination of the Biodiversity Gain Plan under this condition is the mechanism to confirm whether the development meets the biodiversity gain objective. Development may not be begun until the Biodiversity Gain Plan is approved.
>
> Given this, it would generally be inappropriate for decision makers, when determining a planning application for a development subject to biodiversity net gain, to refuse an application on the grounds that the biodiversity gain objective will not be met."

The Statutory Biodiversity Metric

2.19 The Statutory Biodiversity Metric is a system for calculation habitat losses or gains from a project using habitats, measured using Habitat Units (HUs) as a proxy measure. It is accompanied by an excel spreadsheet calculator that assigns values to habitats before a change (PRE-intervention values) and assumed habitat values after the change (POST-intervention values).

2.20 The metric uses the habitat categories that mainly align with UK Habitat Classification Habitat (which is a system for habitat classification that has been developed as an alternative to the Phase 1 Habitat Classification).

2.21 The metric calculates two values: PRE-intervention HU Values and POST-intervention HU values – described below.

PRE-intervention Habitat Unit Values

2.22 The baseline or PRE-intervention Habitat Unit (HU) Value is a factor of:

- The area of the habitat parcel
- The distinctiveness of the Habitat Type [Very Low; Low; Medium; High; Very High]
- The habitat condition assessed using the Condition assessment sheets - [Poor; Moderate; Good]
- The strategic significance [High, within area formally identified in local strategy; Moderate - location ecologically desirable but not in local strategy; Low - area/compensation not in local strategy/ no local strategy]

POST-intervention HU values

2.23 The POST-intervention HU value is a factor of:

- The area of the habitat parcel
- The distinctiveness of the Habitat Type ranging [Very Low; Low; Medium; High; Very High]

- The target habitat condition at a defined number of years [Poor; Moderate; Good]
- The strategic significance [High, within area formally identified in local strategy; Moderate - location ecologically desirable but not in local strategy; Low - area/compensation not in local strategy/ no local strategy]
- The time to target condition [assigned by the Metric to a default time]
- The difficulty of creation of that habitat [assigned by the Metric]
- The spatial risk category - a multiplier to discourage creation of habitats far from the site of biodiversity loss.

Types of HU

2.24 There are three types of HU:

- Area habitats (such as grasslands and woodlands) – "A-HUs"
- Linear hedgerows and lines of trees – "L-HUs"
- Linear rivers and streams – "R-HUs"

2.25 The HU types are not interchangeable.

Description of habitats within the red line planning boundary

2.26 The application site comprises a pair of semi-detached houses and their associated front and rear gardens.

2.27 A brief description of each habitat is given below.

2.28 **Buildings** – 13 and 15 Lancaster Road are a pair of semi-detached, one- and two-storey houses. The roof of the building is pitched, hipped and clad with slate.

2.29 **Hardstanding** – Most of the front gardens of 13 and 15 Lancaster Road consist of hardstanding (gravel and concrete) and there are patios and pathways (paved and concrete) in the rear gardens.

2.30 In addition, there is a hardstanding pathway beyond the south western garden fence which lies within the red line boundary.

2.31 **Amenity grassland and shrub planting**– The site includes part of the rear garden lawns of both properties. These lawns were short-cut at the time of the survey. Across the gardens there are ornamental shrub borders and flower beds.

2.32 The front gardens have short sections of ornamental hedging and some shrub planting above the areas of gravel.

2.33 **Broadleaved trees** – In the rear garden of 15 Lancaster Road, there is a 'small' holly and a 'small' apple tree.

Assumptions made

2.34 The proposed plan (see Figure 2) was used for the post-intervention habitats.

2.35 Maps showing habitats before and after development are given in Appendix 2 and 3.

Area Habitat Units

Pre-intervention

2.36 The Statutory Biodiversity Metric Habitats within the application site at the time of our survey, and their extent and condition pre-development are as follows:

Urban - Developed land -Sealed surface (0.037ha pre-development).

2.37 This is the buildings and hardstanding.

2.38 There is no condition assessment for this habitat type as the metric does not require one.

2.39 All buildings will be removed.

Urban – Vegetated garden (0.014ha pre-development)

2.40 This is the areas of amenity lawn and shrub planting in the front and rear gardens of 13 and 15 Lancaster Road.

2.41 The UK Habitat Classification definition for 'Vegetated Garden' is:

"Garden [see definition below] that is principally vegetated, for example with large areas of grass and flower beds."

2.42 There is no condition assessment for this habitat type as the metric does not require one.

2.43 **NB.** The metric guidance reads:

*"**Recording baseline trees within private gardens***

- record all medium, large and very large trees within private gardens as individual trees"

2.44 There are two 'small' trees (i.e. a tree with a DBH < 30cm) within the application site.

2.45 In accordance with the above quoted guidance the two small trees in the rear garden of 15 Lancaster Road are not included in the calculation.

Post-intervention

New: Urban - Developed land- sealed surface (0.037ha post development)

2.46 This is the new dwelling and its associated driveway and hardstanding.

2.47 There is no condition assessment for this habitat type as the metric does not require one.

New: Urban – Vegetated garden (0.014ha post development)

2.48 This is the new areas of amenity lawn and shrub beds.

2.49 There is no condition assessment for this habitat type as the metric does not require one.

2.50 **NB.** New trees planted in private gardens are not counted in the metric (there are three trees shown as being planted in the new garden area) as the guidance states:

"*You should not:*

- *count newly planted trees sited within private gardens*".

Linear Habitat Units

2.51 There are no linear habitats within the application site and as such no assessment of L-HUs has been undertaken. [NB. The short section of hedge planting in the front gardens is accounted for within the vegetated garden area units.]

3.0 Results and assessment

Area Habitat Units

3.1 The calculation shows that there are 0.028 A-HUs before development (rounded to 0.03 in the metric headline results) and 0.027 A-HUs after development (also rounded to 0.03). This equates to a net loss of 0.001 A-HUs or 3.5% below the on-site A-HU baseline.

3.2 The summary sheet from the Metric is given in Appendix 1.

3.3 The development does not achieve the 10% net gain in A-HU that is required by law.

3.4 It will not be feasible to achieve the 10% net gain in A-HU within the site as new trees, ponds and other habitats (within gardens) are considered part of the vegetated garden habitat and planting new hedgerows do not count towards A-HUs as L-HUs and A-HUs are not interchangeable.

3.5 In order to reach a 10% net gain 0.004 A-HUs would need to be purchased from an offset provider or alternatively if no such credits are available statutory biodiversity credits could be bought from the government. A-HUs cost approximately £20K to £40k per unit plus legal costs.

Linear Habitat Units

3.6 There are no linear habitats within the application site and as such no assessment of L-HUs has been undertaken.

The biodiversity gain hierarchy

3.7 A Local Planning Authorities may ask for confirmation that the Biodiversity Gain Hierarchy has been followed. This hierarchy (which does not apply to irreplaceable habitats) is described below:

1) First, in relation to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and

3.8 There are no habitats with medium, high, or very high distinctiveness on site.

2) Then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.

3.9 As new trees, ponds and other habitats within private gardens do not count towards post development BNG units there are no opportunities to provide habitat units within the application site.

Biodiversity Gain Condition

3.10 Details of on and off-site creation/ enhancement will be provided in the Biodiversity Gain Plan that will be submitted to discharge the Biodiversity Gain condition.

A developer must submit the Biodiversity Gain Plan and it is to be approved in writing by the planning authority. This can be done no earlier than the day after planning permission has been granted.

Appendix 1 – Statutory Biodiversity Metric summary sheet

13 and 15 Lancaster Road

Return to results menu

Headline Results

Scroll down for final results ⚠

On-site baseline	*Habitat units*	0.03		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.03		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site net change (units & percentage)	*Habitat units*	0.00	-3.50%	On-site net gain is less than target set ⚠
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Off-site baseline	*Habitat units*	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	*Habitat units*	0.00	0.00%	
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		

FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-3.50%	Total net gain achieved is less than target set ▲
	Hedgerow units	0.00%	
	Watercourse units	0.00%	
Trading rules satisfied?	No - Check Trading Summaries ▲		

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Habitat units	10.00%	0.03	0.03	0.00	
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 2 – Habitats before development


Legend
Application site boundary
Habitat type before development
Urban - Developed land- sealed surface
Urban - Vegetated garden
N
5
0
5
10
15
Metres
Scale: 1:200

Appendix 3 – Habitats after development


Legend
Application site boundary
Habitat type after development
Urban - Developed land- sealed surface
Urban - Vegetated garden
N
5
0
5
10
15
Metres
Scale: 1:200

Appendix 4 - About GS Ecology

Established in 2009, GS Ecology is an independent ecological consultancy in Berkshire. We carry-out surveys and ecological consultancy services for public and private sector clients.

Our work is undertaken by experienced and qualified ecologists, who are members of the Chartered Institute of Ecology and Environmental Managers. Our services include:

- Ecology surveying and reporting to inform planning applications, e.g.
  - Preliminary Ecological Appraisal
  - Extended Phase 1 Habitat Survey
  - Protected species surveys, e.g. bats, badgers, dormouse, great crested newts
- BREEAM ecology assessments – to demonstrate the sustainability of a new building
- Protected species licensing such as bat and great crested newt licences for development sites after planning permission has been obtained
- Providing advice to land managers and writing ecological management plans, such as woodland management plans and farm environmental plans for England woodland Grant Scheme and Environmental Stewardship applications
- Providing ecology advice to Local Authorities and Local Planning Authorities