MKA
ECOLOGY

Biodiversity Net Gain Assessment

35 Brookdene Drive, London

Site	*35 Brookdene Drive, London*
Project number	*169225*
Client name / Address	*Dipesh Shah, DS Squared Architects, 116A High Street, Edgware, Middlesex, HA8 7EL*

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1.0	*07/07/2025*	*Original*
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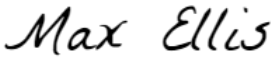
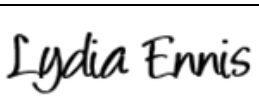
Reviewed by	*Max Ellis*	
Authorised By	*Lydia Ennis ACIEEM*	
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Declaration of compliance

The information which we have provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

We are a Chartered Institute of Ecology and Environmental Management (CIEEM) Registered Practice. All of our ecologists are members of CIEEM and between them carry licences for the majority of protected species.

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1. EXECUTIVE SUMMARY

In June 2025, MKA Ecology Limited was commissioned to undertake a Biodiversity Net Gain Assessment for 35 Brookdene Drive, London. This Biodiversity Net Gain Assessment has been prepared to detail how the biodiversity enhancements in the proposed scheme will lead to an overall benefit to biodiversity.

The baseline comprises a vegetated garden, three trees, and developed land; sealed surface and covers a total of 0.07 hectares. The proposed development involves the demolition of the existing dwelling and the erection of a new dwelling, extension of the private garden to the Site boundary, creation of associated paths, parking, and bin storage in addition to new landscaping. The newly proposed habitats are: vegetated garden, developed land; sealed surface, artificially unvegetated unsealed surface, ornamental hedgerows, and a species rich native hedgerow.

To provide an objective assessment of the potential value of the proposed biodiversity enhancements, the Defra Statutory Biodiversity Metric (Defra, 2025) is applied. The measures, a proxy for biodiversity that use habitat types and their areas, are compared before (the existing condition) and after the completion of the proposed development.

It is concluded that the proposed development will lead to a net loss of -0.16 habitat units (-30.32%) at the Site. The Site has a hedgerow unit baseline of zero, such that a percentage change cannot be calculated, however there will be a net gain of +0.17 hedgerow units under the proposals.

Off-Site compensation of 0.21 habitat units will be required to deliver 10% net gain. It is recommended that these units are purchased from a habitat bank or other offsite provider, ideally located within the Local Planning Authority or National Character Area (NCA; for this site this is 115 - Thames Valley). Should it not be possible to deliver the required biodiversity value through off-Site measures, then statutory credit purchases should be explored. Details regarding how off-Site units will be achieved will be detailed in a BNG Plan to be secured through a condition.

2. INTRODUCTION

2.1. Purpose

This Biodiversity Net Gain Assessment is submitted for the approval of the London Borough of Hillingdon to show how a 10% net gain in biodiversity will be achieved as required by the Local Planning Authority (LPA), and to fulfil requirements of the Environment Act 2021.

The purpose of this assessment is to review the existing biodiversity value of the Site, comparing this to the proposed landscape masterplan and calculate an overall biodiversity net change. The primary method of calculating this change will follow the Defra Statutory Biodiversity Metric (Defra, 2025). The aim of using this method is to demonstrate whether the proposed development and landscape masterplan will deliver a net gain in biodiversity.

The process of achieving and assessing Biodiversity Net Gain should follow the below principles and rules, as set out within *Biodiversity Net Gain, Good Practice Principles for Development* (Baker *et al*., 2019) (Table 1) and *The Statutory Biodiversity Metric – User Guide (draft)* (Defra, 2025) (Table 2).

This Biodiversity Net Gain Assessment is in line with British Standard BS8683.

Table 1: The UK's good practice principles for biodiversity net gain (Baker *et al.,* 2019)

Principle	In practice
1. Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
2. Avoid losing biodiversity that cannot be offset elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve NNL/net gain.
3. Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to net gain. Achieve net gain in partnership with stakeholders where possible.
4. Address risk	Mitigate difficulty, uncertainty and other risks to achieving net gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between losses occurring and gains being fully realised.
5. Make a measurable net gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.

Principle	In practice
6. Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly-justified choices when: • Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses • Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation • Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels • Enhancing existing or creating new habitat • Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity
7. Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).
8. Create a Net Gain legacy	Ensure Net Gain generates long-term benefits by: • Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity • Planning for adaptive management and securing dedicated funding for long-term management • Designing Net Gain for biodiversity to be resilient to external factors, especially climate change • Mitigating risks from other land uses • Avoiding displacing harmful activities from one location to another and • Supporting local-level management
9. Optimise sustainability	Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

Table 2: Biodiversity net gain rules (Defra, 2025)

Rule	In practice
1	The trading rules of this biodiversity metric must be followed.
2	Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.
3	To accurately apply the biodiversity metric formula, you must use the biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.
4	In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

3. HABITATS

3.1. Present – baseline condition survey

A condition assessment was conducted on 25 June 2025 to inform the baseline habitats present and their condition. The Site was found to cover a total of 0.07 hectares and comprise vegetated garden (Photograph 1, Appendix 2), three medium trees (Photograph 4, Appendix 2), developed land; sealed surface (Photograph 2, Appendix 2), and artificial unvegetated unsealed surface (Photograph 3, Appendix 2). The vegetated garden consisted of introduced shrub, modified grassland, and an ornamental pond: all habitats were of low distinctiveness and were therefore mapped as vegetated garden. Prior to the BNG survey and assessment, one early-mature tree had been felled, and so this tree has been included in the baseline (T3, Figure 1). The impact of this on the Net Gain Assessment is addressed in Section 4.7.

There are no hedgerows or watercourses in the baseline.

The habitats at the Site were mapped during survey and are presented in Figure 1. More information on how habitat conditions were assigned is provided in Appendix 1.

Survey constraints are described in Section 4.9.

There are no irreplaceable habitats within the Site boundary. Please note that any impacts on designated sites and protected species that may result from the development are not within the scope of this report.

3.2. Future – proposed landscape and enhancements

The proposed development involves the demolition of the existing dwelling and the erection of a new dwelling, extension of the private garden to the Site boundary, creation of associated paths, parking, and bin storage in addition to new landscaping. The proposed habitat map for 35 Brookdene Drive, London is presented in Figure 2. Proposed habitats are: vegetated garden; ornamental hedgerow; species rich native hedgerow (with more than five native species per 30m section); artificially unvegetated, unsealed surface; and developed land; sealed surface. Habitats proposed within the vegetated garden are introduced shrub, tree planting and modified grassland. To ensure consistency with the baseline, these areas are classified as vegetated garden. This also ensures compliance with the Statutory Biodiversity Metric User Guide which states that biodiversity net gains within private gardens cannot be legally secured, and such areas must therefore be classified as vegetated gardens (Defra, 2025).

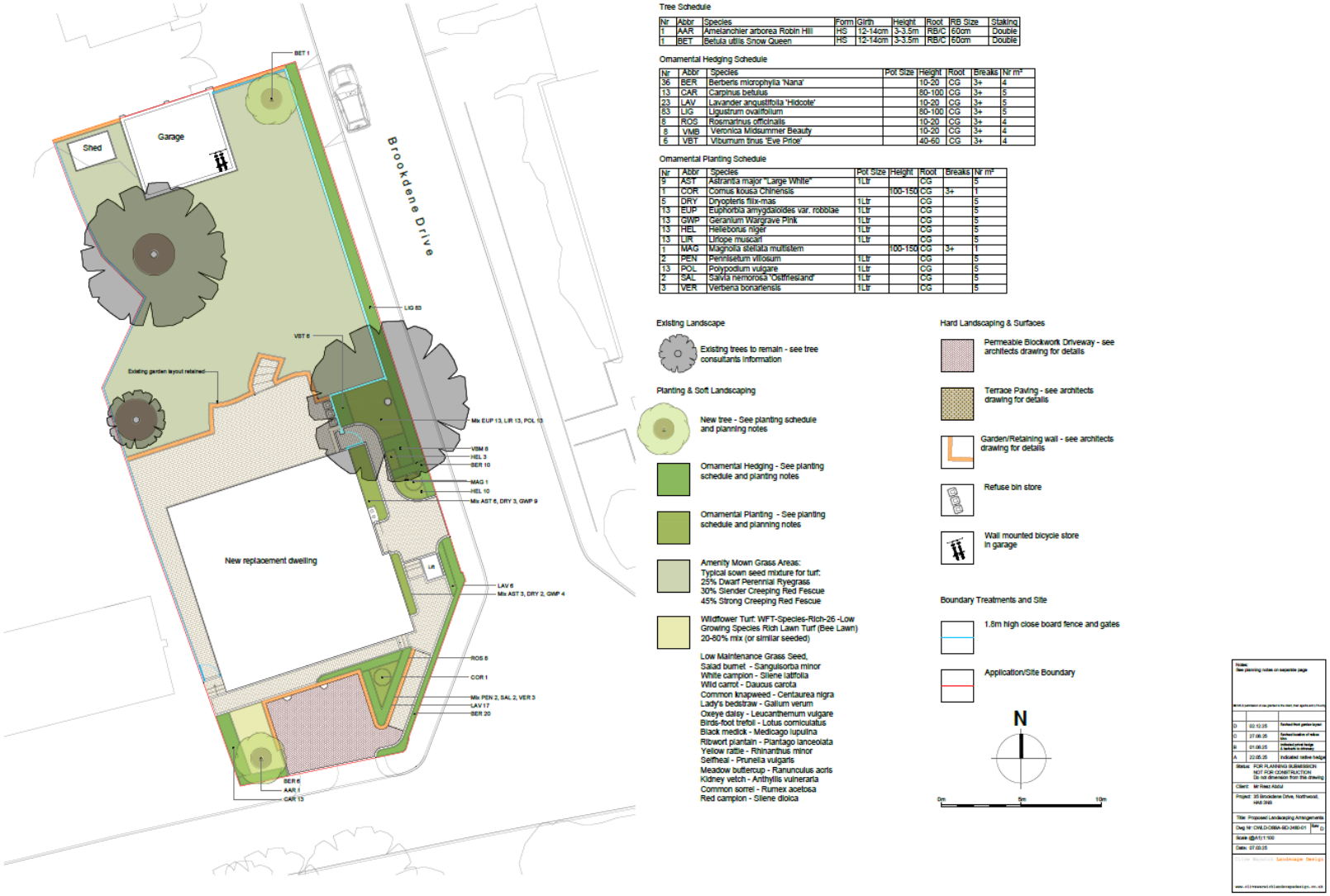
As there are no hedgerows in the baseline, it is not possible to provide a percentage gain in this category. However, the proposed hedgerows are described within this report as they will still provide a biodiversity net gain, even if it cannot be expressed as a percentage value.

It is these proposed habitats that will form the basis of the calculation of 'net-change' in biodiversity using the Defra metric (see Section 4).

Figure 1: Baseline habitats at 35 Brookdene Drive, London

Figure 2. Proposed post-development habitats for 35 Brookdene Drive, London

Figure 3: Landscape Masterplan for 35 Brookdene Drive, London (courtesy of Clive Warwick Landscape Design, 2025)



Tree Schedule

Nr	Abbr	Species	Form	Girth	Height	Root	RB Size	Staking
1	AAR	Amelanchier arborea Robin Hill	HS	12-14cm	3-3.5m	RB/C	60cm	Double
1	BET	Betula utilis Snow Queen	HS	12-14cm	3-3.5m	RB/C	60cm	Double

Ornamental Hedging Schedule

Nr	Abbr	Species	Pot Size	Height	Root	Breaks	Nr m²
36	BER	Berberis microphylla 'Nana'		10-20	CG	3+	4
13	CAR	Carpinus betulus		80-100	CG	3+	5
23	LAV	Lavander angustifolia 'Hidcote'		10-20	CG	3+	5
83	LIG	Ligustrum ovalifolium		80-100	CG	3+	5
8	ROS	Rosmarinus officinalis		10-20	CG	3+	4
8	VMB	Veronica Midsummer Beauty		10-20	CG	3+	4
6	VBT	Viburnum tinus 'Eve Price'		40-60	CG	3+	4

Ornamental Planting Schedule

Nr	Abbr	Species	Pot Size	Height	Root	Breaks	Nr m²
9	AST	Astrantia major "Large White"	1Ltr		CG		5
1	COR	Cornus kousa Chinensis		100-150	CG	3+	1
5	DRY	Dryopteris filix-mas	1Ltr		CG		5
13	EUP	Euphorbia amygdaloides var. robbiae	1Ltr		CG		5
13	GWP	Geranium Wargrave Pink	1Ltr		CG		5
13	HEL	Helleborus niger	1Ltr		CG		5
13	LIR	Liriope muscari	1Ltr		CG		5
1	MAG	Magnolia stellata multistem		100-150	CG	3+	1
2	PEN	Pennisetum villosum	1Ltr		CG		5
13	POL	Polypodium vulgare	1Ltr		CG		5
2	SAL	Salvia nemorosa 'Ostfriesland'	1Ltr		CG		5
3	VER	Verbena bonariensis	1Ltr		CG		5

Existing Landscape

Existing trees to remain - see tree consultants information

Planting & Soft Landscaping

New tree - See planting schedule and planning notes

Ornamental Hedging - See planting schedule and planting notes

Ornamental Planting - See planting schedule and planning notes

Amenity Mown Grass Areas:
Typical sown seed mixture for turf:
25% Dwarf Perennial Ryegrass
30% Slender Creeping Red Fescue
45% Strong Creeping Red Fescue

Wildflower Turf: WFT-Species-Rich-26 -Low Growing Species Rich Lawn Turf (Bee Lawn) 20-80% mix (or similar seeded)

Low Maintenance Grass Seed,
Salad burnet - Sanguisorba minor
White campion - Silene latifolia
Wild carrot - Dausus carota
Common knapweed - Centaurea nigra
Lady's bedstraw - Galium verum
Oxeye daisy - Leucanthemum vulgare
Birds-foot trefoil - Lotus corniculatus
Black medick - Medicago lupulina
Ribwort plantain - Plantago lanceolata
Yellow rattle - Rhinanthus minor
Selfheal - Prunella vulgaris
Meadow buttercup - Ranunculus acris
Kidney vetch - Anthyllis vulneraria
Common sorrel - Rumex acetosa
Red campion - Silene dioica

Hard Landscaping & Surfaces

Permeable Blockwork Driveway - see architects drawing for details

Terrace Paving - see architects drawing for details

Garden/Retaining wall - see architects drawing for details

Refuse bin store

Wall mounted bicycle store in garage

Boundary Treatments and Site

1.8m high close board fence and gates

Application/Site Boundary

N

0m 5m 10m

4. METHODOLOGIES

4.1. Biodiversity Net Gain assessor

This Biodiversity Net Gain Assessment was conducted by Max Ellis and Jessica Thomson, Consultant Ecologist and Graduate Ecologist at MKA Ecology Ltd respectively. Max has over three years' experience conducting Biodiversity Net Gain assessments and is considered a competent assessor under the Statutory Biodiversity Metric requirements (Defra, 2025). Jessica is within her first year as an ecologist. The Biodiversity Net Gain Assessment was reviewed by Max and approved by Lydia Ennis ACIEEM, Senior Ecologist at MKA Ecology Ltd. Lydia has eight years' experience as a professional ecologist and is considered a competent assessor under the Statutory Biodiversity Metric requirements (Defra, 2025).

4.2. Assignment of habitats

To establish whether the proposed development will contribute positively to biodiversity we use the Defra Statutory Biodiversity Metric (Defra, 2025). This method uses habitat as a proxy for biodiversity and its primary application is to provide planners and developers with a method of establishing how much and what type of habitats should be created or enhanced in order to ensure that the proposed development results in a net gain for biodiversity. Habitats are assigned the following scores:

- Distinctiveness: A measure of the type and importance of a habitat.
- Condition: A measure of the present or predicted condition of a habitat type.
- Strategic significance: How a habitat is regarded within Local Planning Policy.

Habitat distinctiveness is automatically assigned in the Statutory Biodiversity Metric. Please see Appendix 1 for further information on how habitat condition and strategic significance was assigned in this assessment.

For proposed habitats, where there is an attempt to predict the habitat type following establishment additional handicaps or risk scores are imposed representing the following factors:

- Difficulty: More difficult habitats incur a greater risk.
- Time to condition: In general, it takes longer for habitats to reach a better condition, plus certain habitats by their very nature take longer to create or restore.
- If the creation or enhancement of habitats is delayed, an additional risk score is applied. This will not apply in the present case.
- If habitats are created off-site, an additional risk score is applied. This will not apply in the present case.

The multipliers used in habitat assignment in the Biodiversity Net Gain Metric are detailed further in Table 3 below.

Table 3: Multipliers used in the calculation of Biodiversity Net Gain

Multiplier	When applied	Description
Distinctiveness	Before and after	A measure of the type of habitat, automatically assigned within the Metric. Habitats with greater value are assigned a higher score.
Condition	Before and after	The condition of the habitat. Uses the Technical Supplement (*Panks et al. 2021a*); Higher levels of condition give rise to greater values. In some cases, no condition assessment is required and these habitats are automatically allocated a score.
Strategic significance	Before and after	Whether a habitat is important within its local context.
Time to target condition	After	Used to account for the fact that habitat creation as part of a development is rarely instant. A 'handicap' is applied, with habitats that take longer to establish resulting in a greater reduction.
Difficulty of creation/restoration	After	Habitats that are more difficult to create/restore cause a reduction in the biodiversity unit as they are associated with a greater risk of failure.
Spatial risk	After	Habitat that is created at a greater distance away from the development site carries a greater risk of removing other natural habitats.
Advanced and delayed habitat creation	After	Used to account for situations where there is a mismatch between a negative impact on biodiversity and work to create or enhance the 'post-intervention habitats'. This can either be in the form of habitat creation occurring in advance or being delayed beyond the point of baseline losses.

4.3. Trading Summary

The Defra Statutory Biodiversity Metric includes a Trading Summary which must be satisfied to achieve a positive outcome in the Net Gain assessment (see Rule 1, Table 2). The trading rules ensures that habitat losses are compensated for on a "like for like" or "like for better" basis. Newly created or enhanced habitats should achieve a higher distinctiveness and/or condition than those lost.

Further details on how the metric is calculated is provided in the aforementioned publications, with more site-specific detail provided in Appendix 1 and Appendix 2.

4.4. Mapping habitats

Current habitats were mapped and areas calculated using QGIS during the condition assessment (see Section 3.1 for details of habitat types). The proposed habitats are shown in Figure 2 and were calculated in QGIS using a digitised and geo-referenced version of the landscaping plans (see Section 3.2 for details of habitat types). The landscaping plans provided by Clive Warwick Landscape Design (2025) are shown in Figure 3.

4.5. Hedgerows

Hedgerows, given their unique linear characteristic and their position as 'edge habitats' are treated as linear features in the Statutory Biodiversity Metric calculator and are calculated as 'biodiversity metres'. There were no hedgerows present in the baseline. The lengths of the proposed hedgerows were calculated in QGIS using a digitised and geo-referenced version of the landscaping plans.

4.6. Rivers and streams

Rivers and streams, given their linear form and important role in habitat connectivity, are treated as linear features in the Statutory Biodiversity Metric calculator and are calculated as 'biodiversity metres'. The metrics calculated for rivers and streams have therefore been calculated and presented separately. No rivers are present on-Site and therefore this category is omitted in this assessment.

4.7. Habitat degradation

It is confirmed that the baseline habitats have been significantly altered or modified since 30 January 2020 and, as such, it is not appropriate to assess the baseline habitats in their current condition. Prior to the BNG survey and assessment, one early-mature tree had been felled, and so this tree has been included in the baseline (T3, Figure 1). Using previous arboriculture surveys (Arbol Euro Consulting Ltd, 2025) of the Site to estimate the condition, the felled tree was identified as a medium English yew *Taxus baccata* in moderate condition. As it was not possible to undertake an in-person assessment of this tree, a conservative assessment was made when deciding on the likely condition. Further details of the condition assessments of this tree can be found in Appendix 1.

4.8. Sharing data

Relevant ecological data collected during baseline habitat and protected species surveys at the Site will be shared with Greenspace Information for Greater London CIC (GIGL) and Herts Environmental Records Centre (HERC) following acceptance of this Biodiversity Net Gain Assessment.

4.9. Assumptions and constraints

Several assumptions are made to enable this Biodiversity Net Gain assessment. The primary assumptions are listed below:

- The net gains in biodiversity that are estimated are reliant on the successful restoration and/or creation of habitats and their maintenance for the foreseeable future. This is particularly true of the retained and proposed trees;

- It is assumed that there will be no time delay in establishing the vegetated garden, hedgerow habitats, and tree planting;
- Proposed tree canopy areas have been calculated using the 'Tree Helper' within the Metric calculator tool. As per guidance in the Statutory Biodiversity Metric User Guide (Defra, 2025) size classes for newly planted trees have been categorised as 'small';
- As per the Statutory Biodiversity Metric User Guide (Defra, 2025), as this Site comprises a private garden, the defined mosaic habitat of vegetated garden has been used for all areas of vegetation of low biodiversity value. Trees have been mapped within the baseline as medium and large trees should be recorded within vegetated gardens in order to avoid underrepresenting the biodiversity within the Site (Defra, 2025). Newly planted trees have not been mapped within proposed habitats as per the Statutory Biodiversity Metric User Guide (Defra, 2025); and
- Tree T3 had been felled prior to the condition assessment, therefore condition scores have been calculated using the arboriculture survey carried out on the Site in October 2022 (Arbol Euro Consulting Ltd, 2025).

5. RESULTS AND RECOMMENDATIONS

5.1. Results

The overall comparison of biodiversity units is presented in Table 4 below. The calculator used to derive these figures is provided as a separate appendix (Appendix 2) to this report. With the current layout, there will be a net loss of biodiversity of -29.24% with a negative net change of -0.10 biodiversity units.

Table 4: Results of biodiversity metric calculations

Habitat	Biodiversity units (current)*	Biodiversity units (proposed)*	Biodiversity net-change*	Net percentage change
Habitats	0.52	0.36	-0.16	-30.32%
Hedgerows	0.00	0.17	+0.17	N/A

* Habitat areas are calculated as biodiversity hectares, hedgerows as biodiversity metres

On-Site measures

The largest number of habitat units (0.06 units) are provided from the creation of the vegetated garden habitat on-Site. The net loss of habitat units is primarily caused by the loss of the yew tree on-Site (-0.15 units). The trading rules for this development have not been met due to this loss of a medium distinctiveness habitat without adequate compensation in the proposed development.

The final Net Gain score for 35 Brookdene Drive, London is -30.32%. The unit shortfall required to deliver 10% net gain in habitats is 0.21 units.

Off-Site measures

It has not been possible to achieve a net gain on-Site or meet the trading rules. Individual trees are medium distinctiveness habitats in the BNG Statutory Metric. The loss of habitats of medium distinctiveness must be compensated for on a “like for like” or “like for better” basis in order to meet the trading rules of the Statutory Biodiversity Metric. This means compensation must be in the form of habitats of medium distinctiveness in the same broad habitat type (in this case, individual trees) or a habitat of higher distinctiveness from any broad habitat type. Vegetated garden is a low distinctiveness habitat. The loss of low distinctiveness habitats must be compensated for through low distinctiveness habitat units of any broad habitat type or higher distinctiveness habitat units of any broad habitat type.

5.2. Recommendations

Off-Site measures will be required in order to achieve a minimum 10% net gain in habitat units. A minimum of 0.21 units must be delivered off-Site to satisfy the trading rules and deliver a net gain. Off-site units can be purchased directly from a landowner, or from a habitat bank operator or broker. Some LPAs also sell off-site units. If none of these options are possible, statutory biodiversity credits can be purchased directly from Natural England, though this option is normally more expensive.

In the BNG Metric, a spatial risk multiplier (SRM) reflects the relationship between the location of on-Site biodiversity loss and the location of off-Site habitat compensation. It affects the number of biodiversity units provided to a project by penalising proposals where off-Site habitat is located at distance from the development Site. Where compensation for biodiversity loss is located within the Local Planning Authority (LPA) or National Character Area (NCA), the SRM is 1.0. It is therefore recommended that in the first instance off-Site units are acquired within the LPA boundary or National Character Area (NCA; for this site this is 115 - Thames Valley). It should be noted that where compensation for biodiversity loss is located outside of the LPA/NCA boundary, but within a neighbouring LPA/NCA, the SRM is 0.75. Where compensation is located outside of a neighbouring LPA/NCA, the SRM is 0.5.

Recommendation 1

Acquire the off-Site habitat units required in order to achieve an overall net gain score of 10% within the LPA/NCA boundary.

6. CONCLUSIONS

The proposed development at 35 Brookdene Drive, London involves the demolition of the existing dwelling and the erection of a new dwelling, extension of the private garden to the Site boundary, creation of associated paths, parking, and bin storage in addition to new landscaping. The baseline comprises a vegetated garden, three trees, and developed land; sealed surface and covers a total of 0.07 hectares. The newly proposed habitats include vegetated garden, ornamental hedgerows, species rich native hedgerow, and developed land; sealed surface.

The use of the Defra Statutory Biodiversity Metric to calculate measures of biodiversity for the existing and proposed habitats confirm that the proposed development is likely to lead to a net loss of -30.32% in habitat units. Whilst there are no hedgerows in the baseline, a total of 0.18 units of new hedgerow are also provided, though this figure cannot be expressed as a percentage.

Off-Site measures will be required in order to achieve a minimum 10% net gain in habitat units. Off-Site compensation of 0.21 habitat units will be required, either through working with the LPA or through an off-Site habitat bank or broker.

7. REFERENCES

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8. APPENDICES

8.1. Appendix 1: Assignment of biodiversity metric multipliers

Strategic significance

The Greater London Authority has not yet published a Local Natural Recovery Strategy (LNRS) covering the London Borough of Hillingdon. Therefore, strategic significance has been assigned based on the available local planning documents, including the London Plan 2021 and the Hillingdon Local Plan 2012.

Urban trees, have all been assigned high strategic significance as they deliver on policies G5 – 'Urban Greening' and G7 – 'trees and woodlands' regarding urban greening within the London Plan 2021; and local policy EM7 within Hillingdon Local Plan: Part 1 (2012) and policies DMH 6, DMHB 14, DMHD 1 within the Hillingdon Local Plan: Part 2 (2020). All other baseline area habitats have been assigned low strategic significance as they are not of elevated value, nor do they offer a significant contribution to amenity or local character.

The proposed native species-rich hedgerows have been assigned high strategic significance because they qualify as a Habitat of Principal Importance (HPI) as listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. All other proposed habitats have been assigned low strategic significance as they are not of elevated value, nor do they offer a significant contribution to amenity or local character.

Condition

The below tables detail the rationale for the condition assessments made for each habitat type.

Current habitats

Individual tree – Urban tree
0.0489 ha

Condition Assessment criteria		Rationale for Meeting Condition Assessment Criteria	T1	T2	T3
1	*The tree is a native species (or at least 70% within the block are native species).*	T1 is a eucalyptus *Eucalyptus sp*. T2 is a non-native oak. T3 was a native English yew tree.	x	x	✓
2	*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).*	Individual trees automatically pass this criterion.	✓	✓	✓

	Condition Assessment criteria	Rationale for Meeting Condition Assessment Criteria	T1	T2	T3
3	*The tree is mature (or more than 50% within the block are mature).*	T1, T2, were early-mature at the time of survey. T3 was identified as early-mature within the arboriculture report (Arbol Euro Consulting Ltd, 2025)	x	x	x
4	*There is little or no evidence of an adverse impact on tree health by human 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.*	No evidence of human impacts was observed for T1 and T2. T3 was pruned overtime with a unnatural box-shaped crown (Arbol Euro Consulting Ltd, 2025).	✓	✓	x
5	*Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.*	No ecological niches were present within T1, T2. As T3 was early-mature, it is unlikely that any ecological niches were present.	x	x	x
6	*More than 20% of the tree canopy area is oversailing vegetation beneath.*	T1 and T2 are surrounded by vegetated garden which covered at least 20% of the area of the canopy. T3 was also surrounded >20% by vegetated garden.	✓	✓	✓
*	**Condition: Moderate** T1 and T2 meet the condition of criteria 2, 4, and 6. T3 meets the conditions of criteria 1, 2, and 6.				

Other habitats

Habitat	Condition score	Rationale for condition assessment
Urban – developed land; sealed surface (0.031 ha)	N/A - Other	No condition assessment required – allocated a score of 0.
Urban - vegetated garden (0.0361 ha)	Condition Assessment N/A	No condition assessment required – allocated a score of 1.
Urban – artificial unvegetated, unsealed surface (0.0012 ha)	N/A - Other	No condition assessment required – allocated a score of 0.

Proposed habitats

Other habitats

Habitat	Condition score	Rationale for condition assessment
Urban - Artificial unvegetated, unsealed surface (0.0305 ha)	N/A - Other	No condition assessment required – allocated a score of 0
Urban - Artificial unvegetated, unsealed surface (0.0019 ha)	Condition Assessment N/A	No condition assessment required – allocated a score of 1
Urban - Vegetated garden (0.036 ha)	Condition Assessment N/A	No condition assessment required – allocated a score of 1

Proposed hedgerows

Species-rich native hedgerow

0.026 km

Condition Assessment criteria		Rationale for Meeting Condition Assessment Criteria	
A1	*Height: >1.5m average along length*	Hedgerows are not expected to be more than 1.5m in height based on the species lists supplied within the landscaping plans showing the maximum height to be 80cm.	x
A2	*Width: >1.5m average along length*	Hedgerows are not expected to be more than 1.5m wide based on plans and the Site being developed for use as a residential garden.	x
B1	*Gap - hedge base: Gap between ground and base of canopy <0.5m for >90% of length*	Should be achievable with appropriate management. Gaps will be filled in with more native planting if and when they arise.	✓
B2	*Gap - hedge canopy continuity: Gaps make up <10% of total length; and no canopy gaps >5m*	Should be achievable with appropriate management. Gaps will be filled in with more native planting if and when they arise.	✓
C1	*Undisturbed ground and perennial vegetation: >1m width of undisturbed ground with perennial herbaceous vegetation for >90% of length:* - *Measured from outer edge of hedgerow; and* - *Is present on one side of the hedgerow (at least).*	This criterion is conservatively failed as disturbance will be inevitable given that this will be used as a residential garden.	x
C2	*Nutrient-enriched perennial vegetation: Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground.*	This criterion is conservatively failed as the hedgerow is not expected to have an undisturbed buffer.	x
D1	*Invasive and neophyte species: >90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of Wildlife and Countryside Act) and recently introduced species.*	This criterion is achievable with appropriate management. Invasives to be removed as they arise, as will be detailed in the HMMP.	✓
D2	*Current damage: > 90% of the hedgerow or undisturbed ground is free of damage caused by human activities.*	This criterion is achievable with appropriate management. The HMMP will detail appropriate management of the hedgerow, and there will be no damaging human activities.	✓
*	**Condition: Poor** Four criteria passed but does fail both criteria in more than one functional group (groups A and C).		

Other hedgerows

Habitat	Condition score	Rationale for condition assessment
Non-native ornamental hedgerow (0.0484 km)	Poor	No condition assessment required – pre-assigned condition in metric.

8.2. Appendix 2: Photographs of baseline habitats of 35 Brookdene Drive, London

Photograph 1: Vegetated garden

Photograph 2: Developed land; sealed surface

Photograph 3: Artificial unvegetated, unsealed surface

Photograph 4: Individual tree

8.3. Appendix 3: Biodiversity Net Gain calculator

As attachment.

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