Manor Lodge
Rickmansworth Road
Northwood
HA6 2QT

Biodiversity Statement and Biodiversity Gain Plan

Luscinia Ecology
On behalf of
Merchant Land Investments Limited

Document Properties

Reference	Revision	Date	Author	Reviewer
LUS24163 BS&BGP	Draft	06/01/2025	Greg Nightingale	Greg Nightingale
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Contents

Chapter 1: Biodiversity Statement 1
Chapter 2: Summary 2
Chapter 3: Introduction 3
Chapter 4: Method 7
Chapter 5: Baseline and Proposed Development 15
Chapter 6: Results and Summary 18
Appendix A: Delivery of Good Practice Principles i
Appendix B: Condition Assessment Tables iii

Chapter 1: Biodiversity Statement

Do you believe that, if the development is granted permission, the general Biodiversity Gain Condition (as set out in Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended) would apply?	Yes
Please provide the pre-development biodiversity value of the onsite habitats on the date of the calculation.	Habitat: 0.63 Hedgerow: 0.10 Watercourse: 0.0
Please provide the date the onsite pre-development biodiversity value was calculated.	24/03/2020
If an earlier date, to the date of the planning application, has been used, please provide details why this date has been used.	Date or aerial imagery prior to degradation
Which version of the biodiversity metric was used?	The Statutory Biodiversity Metric
When was the version of the biodiversity metric used published?	06/08/24
Please provide the reference or supporting document/plan names for the: 'Biodiversity metric calculation', 'Onsite irreplaceable habitat (if any)', and 'Onsite habitats existing on the date of the application for planning permission (if applicable)'.	LUS24163 BS&BGP
Does the pre-development biodiversity value and date used above factor in the loss of any onsite habitat because of activities carried out before the submission of this application? (i.e., has degradation occurred?)	Yes
Please provide the pre-development value of the onsite habitat before these activities were carried out.	Habitat: 0.63 Hedgerow: 0.10 Watercourse: 0.0
Please provide the date the pre-development biodiversity value was calculated.	24/03/2020
Please provide the evidence associated with the value of the onsite habitat before these activities were carried out.	LUS24163 BS&BGP
Does the development site have irreplaceable habitats (corresponding to the description in column 1 of [Schedule to the biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2023)] which are: i. on land to which the application relates; and ii. existed on the date of the application for planning permission, (or an earlier agreed date)	No
Luscinia Ecology Ltd has provided the above Biodiversity Statement and this report in good faith and using reasonable care and due diligence. However, in relation to any statement around degradation and any associated retrospective assessment, Luscinia Ecology Ltd cannot be held accountable or liable for inaccuracies or alternative interpretations.	

Chapter 2: Summary

2.1 The Statutory Biodiversity Metric has been completed in relation to Manor Lodge, Rickmansworth Road, Northwood, HA6 2QT.

2.2 Current Biodiversity Net Gain policy requirements relating to development in the Hillingdon Council area require a 10% Biodiversity Net Gain outcome.

2.3 This assessment has been based upon a site visit and has been completed by an ecologist experienced in the Biodiversity Net Gain Assessment process. Full methods and assessments are included within this report. The completed Statutory Biodiversity Metric excel file will be submitted alongside this report.

2.4 Following the Mitigation Hierarchy and the Biodiversity Gain Hierarchy, the Proposed Development will not remove any irreplaceable habitats, or habitats of very high, or high distinctiveness.

2.5 The headline results demonstrate a net gain of 0.04 hedgerow units (+35.10%) and a net loss of 0.11 habitat units (-25.12%) with the Trading Rules not met due to the overall loss of habitat units, including tree units (**Figure 7**). As there are no watercourse units in the baseline, there is no requirement to provide a net gain in these units.

2.6 Proposed Development will result in a net gain of 0.04 hedgerow units (+35.10%) and a net loss of 0.11 habitat units (-25.12%), with the Trading Rules not met due to the overall loss of habitat units, including tree units. As there are no watercourse units in the baseline, there is no requirement to provide a net gain in these units.

2.7 Therefore, the Proposed Development will meet current policy requirements in relation to Biodiversity Net Gain via the Biodiversity Offsetting process. An offset comprising 0.15 habitat units, including 0.02 tree units, will be required.

2.8 The measures within this report should be secured by a condition for a Habitat Maintenance and Monitoring Plan.

2.9 The Applicant is aware of, and has committed to, all the mitigation, compensation, and enhancement measures set out within this report.

2.10 Based on the results from the survey, context of the Site, and overall low ecological importance of the Site, this report is valid for a period of 18 months (i.e., the 17/06/2026).

Chapter 3: Introduction

Planning Context

3.1 This report sets out a Biodiversity Statement and Biodiversity Gain Plan in relation to Manor Lodge, Rickmansworth Road, Northwood, HA6 2QT (referred to as 'the Site' throughout this report). This report is supported by a site visit undertaken on 06/03/2024 and an Ecological Assessment[1].

3.2 The Environment Act 2021 sets out a mandatory requirement for all planning permissions in England (with a few exemptions) to deliver a 10% Biodiversity Net Gain (BNG) using the Statutory Biodiversity Metric.

3.3 In accordance with the National Planning Policy Framework (NPPF)[2] proposals should seek to demonstrate BNG. The NPPF states:

> *"Planning policies and decisions should contribute to and enhance the natural and local environment by:*
>
> *…*
>
> *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 and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;"*

3.4 And:

> *"To protect and enhance biodiversity and geodiversity, plans should:*
>
> *'…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."*

3.5 There are no current local policies, Supplementary Planning Guidance, or Supplementary Planning Documents in the Hillingdon Council area which relate to the BNG Assessment process.

3.6 In accordance with Environment Act, NPPF, and Hillingdon Council policies, the Proposed Development has a targeted BNG outcome of at least 10%.

Site Description

3.7 The aerial image of the Site shows the Site consists of a residential plot, including a residential property, garage, and a curtilage of hardstanding and gardens (**Figure 1**).

[1] Luscinia Ecology (2025). *Manor Lodge, Rickmansworth Road, Northwood, HA6 2QT: Ecological Assessment: LUS24163 EA Submission.* Luscinia Ecology, Bristol.
[2] MHCLG (2025). National Planning Policy Framework. February 2025. Ministry of Housing, Communities and Local Government, London.

The Site is approximately 0.2 ha in size and located at National Grid Reference: TQ 08814 91173. The plot is accessed from Rickmansworth Road to the west. The surrounding landscape comprises dense development to the north and east and a golf course to the south and west. The golf course includes, and connects to, various areas of deciduous woodland, including a large area of ancient and semi-natural woodland 700m to the south of the Site.

Figure 1. Aerial image of the Site - red line shows the Site boundary[3]

Proposed Development

3.8 This report will be submitted alongside a planning application for the *"Demolition of existing house and construction of three pairs of semi-detached houses and associated alterations to access points, car and cycle parking and proposed hard and soft landscaping"* (referred to as the 'Proposed Development' throughout this report). Access will be via a track, which leads to Rickmansworth Road to the west. The Proposed Development will result in the removal of the habitats within the Site and placement with buildings, hardstanding, and gardens. **Figure 2** shows the Proposed Development.

[3] Image used under licence: ©2023 Google; Accessed: 06/01/2025.

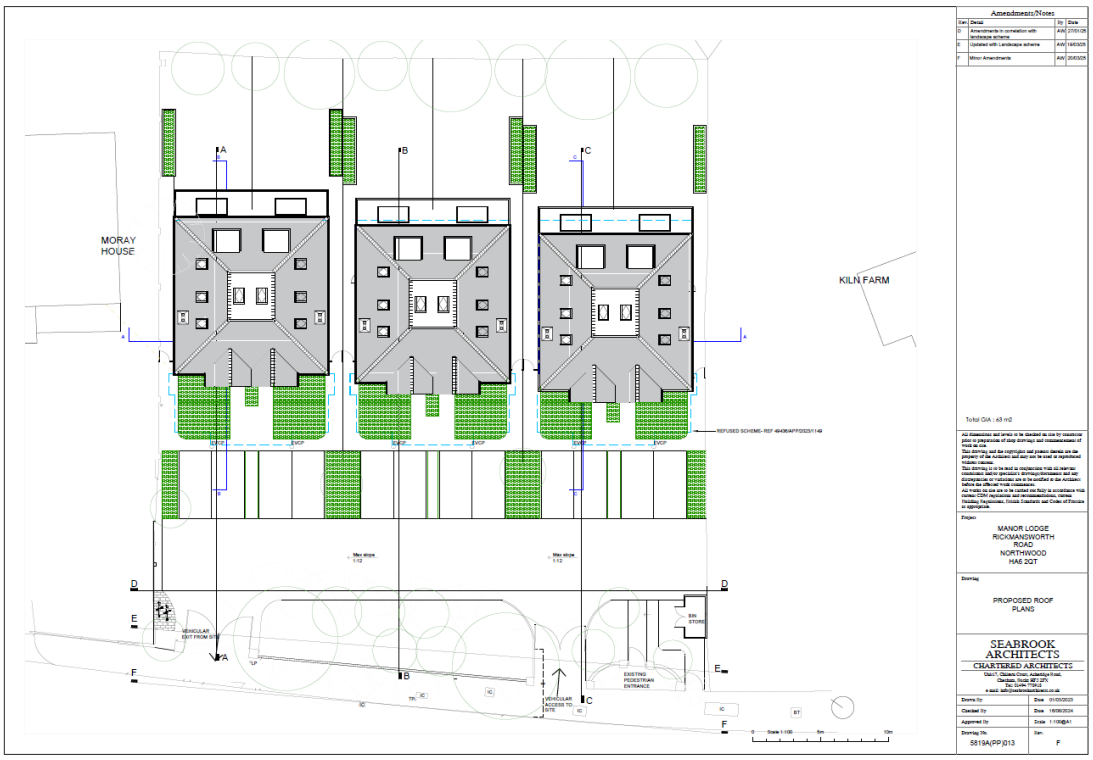

Figure 2. The Proposed Development

Purpose of this report

3.9 The purpose of this report is to provide sufficient information for the Local Planning Authority to fully assess the ecological impacts of the Proposed Development, via the BNG Assessment process.

3.10 The key objectives of this Biodiversity Statement and Biodiversity Gain Plan are to:

- Determine the BNG percentage required to be delivered by the Proposed Development.
- Outline the BNG Assessment method, including any limitations, assumptions, clarifications, and/or deviations.
- Follow the Mitigation Hierarchy and the Biodiversity Gain Hierarchy, and outline if irreplaceable habitats will be lost.
- Undertake the BNG Assessment:
- Determine the BNG on-site baseline using the data search, ecological reporting, BNG Condition Assessments, and The Statutory Biodiversity Metric.
- Determine the BNG on-site post development outcome, using the details within Figure 2.
- Compare the on-site baseline with the on-site post development outcome to determine the
- Outline the agreed management activities, including the identification of the On-site Significant Enhancements.

- Outline the agreed monitoring and adaptive management requirements.
- Determine if a require percentage increase in BNG has been achieved, or the measures required to achieve the BNG.

Chapter 4: Method

Biodiversity Net Gain

4.1 Calculations have been carried out with regards to Biodiversity Net Gain: Good Practice Principles for Development guidance[4] and in line with the Statutory Biodiversity Metric guideline[5]. **Appendix A** sets out how each of the BNG Good Practice Principles[6] have been applied. In this way, this report meets **Principle 3** of The Statutory Biodiversity Metric.

4.2 The Statutory Biodiversity Metric is the established method for calculating BNG and provides a quantitative approach to losses and gains resulting from development or land management changes. Whilst The Statutory Biodiversity Metric is the default system of calculating BNG, it should not be considered a complete tool in assessing BNG and therefore professional judgement has been used where appropriate (this includes consideration of Environmental Net Gain (ENG)). Where professional judgement has been used, this is outlined in the text, and additional references have been provided. This is in line with **Principles 4 and 6** of The Statutory Biodiversity Metric:

> *"Principle 4: This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice."*
>
> *…*
>
> *Principle 6: This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance."*

Site Visit

4.3 The Site was surveyed using the UK Habitat Classification Survey[7] method on 17/12/2024. The method classified the Site into areas of similar botanical community types with a representative sample of those species present at the time of the survey being described. The vegetation present was clearly visible and allowed an accurate assessment to be made. During the Site survey, The Statutory Biodiversity Metric Condition Assessment sheets[8] were used to gather the necessary ecological information to determine the condition of the habitats present within the Site.

4.4 A UK Habitat Classification Plan was produced (**Figure 3**).

[4] Baker J., Hoskins R., and Butterworth T. (2019). *Biodiversity Net Gain. Good practice principles for development: A practical guide*. Ciria, London.
[5] Defra (2024). *The Statutory Biodiversity Metric: User Guide: Date July 23rd 2024*. Department for Environment food and rural affairs, London.
[6] Baker J., Hoskins R., and Butterworth T. (2016). *Biodiversity Net Gain. Good practice principles for development*. Ciria, London.
[7] UKHab Ltd (2023). *UK Habitat Classification Version 2.0*. UKHab Ltd, Stockport.
[8] Defra (2024). *The Statutory Biodiversity Metric: Technical Annex 1: Condition Assessment Sheets and Methodology: Date February 2024*. Department for Environment food and rural affairs, London.

Figure 3. UK Habitat Classification Plan

4.5 The site visit data and Extended UK Classification Plan were compared to historic aerial imagery from 24/03/2020 (**Figure 4**), and an On-Site Baseline Map was produced (**Figure 5**).

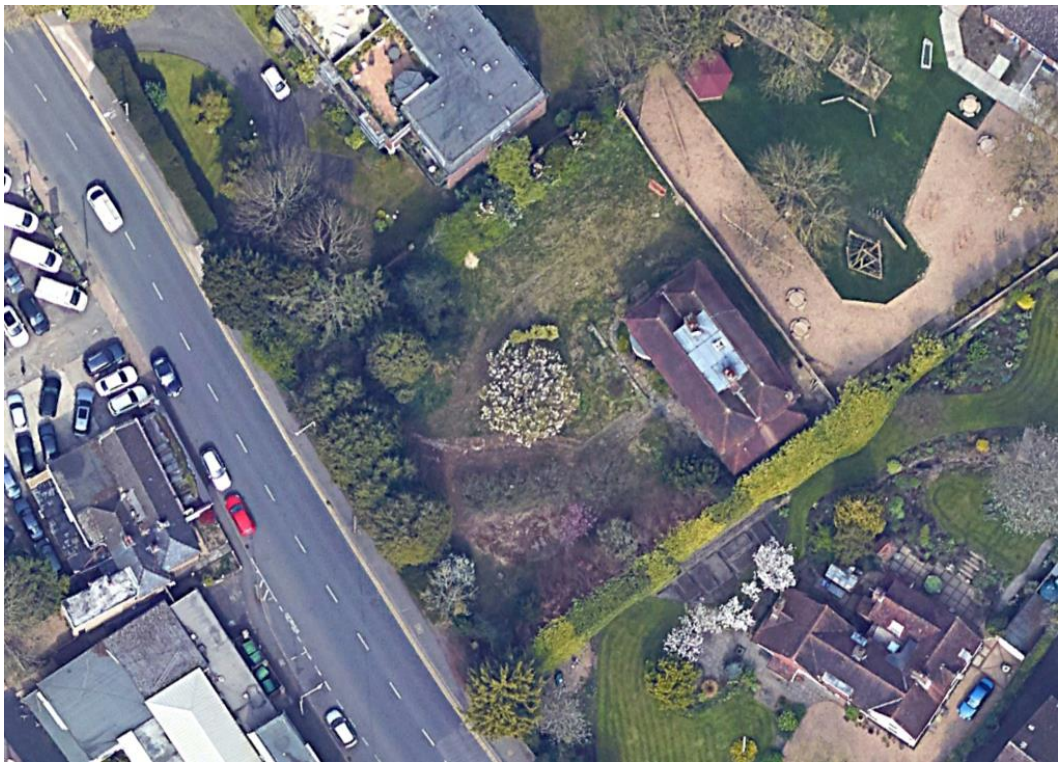

Figure 4. Historic aerial imagery of the Site from 24/03/2020

Figure 5. Onsite Baseline Map

4.6 Based on the results of the surveys used to inform this assessment, the context of the Site, and the high likelihood that the habitats within the Site will not change significantly over time, this report is valid for a period of 18 months (i.e., the 17/06/2026). This is reasoned in line with good practice guidelines[9].

Baseline Calculation

4.7 To calculate the baseline area and linear units for the Site the following data and assessments were undertaken:

- The UK Habitat Classification habitats were converted, where necessary into the relevant habitats within The Statutory Biodiversity Metric.
- The UK Habitat Classification 25m^2 rule was applied[10].
- The habitats were then assigned a pre-set distinctiveness grade[11].
- The area (hectares) of each habitat parcel and length of linear habitats (km) within the Site was calculated from the On-site Baseline Map (**Figure 3**).
- Scattered trees were calculated using the Tree Helper Tool, following the size guidelines within The Statutory Biodiversity Metric User Guide and using either data collected directly by the ecologist or via information within the Proposed Development's Tree Schedule, with the use of a Tree Schedule taking precedence.

[9] CIEEM (2019). Advice Note: *On the Lifespan of Ecological Reports and Surveys*. Chartered Institute for Ecology and Environmental Management, Winchester
[10] Habitats occupying less than 25m^2 were absorbed and considered within the adjacent habitat(s).
[11] Indicative of the inherent 'value' of the habitat.

- Where applicable, habitats were subject to a 'condition assessment'[12].
- Habitats were subject to a strategic significance assessment[13].

4.8 The baseline habitats (as detailed above) were entered into The Statutory Biodiversity Metric to calculate baseline biodiversity units for the Site.

Proposed Development Assessment

4.9 Using the Proposed Development shown **Figure 2**, an On-site Post Intervention Map (**Figure 6**) was produced.

Figure 6. On-site Post Intervention Map

4.10 In relation to created and enhanced habitats, all habitat interventions within this report are considered to be realistic and deliverable within the project time frame (in line with **Principle 7** of The Statutory Biodiversity Metric), along with the expected or agreed management resources and availability of funding.

4.11 The same process was completed using the On-site Post Intervention Map (**Figure 6**), along with the following additional methods:

- The loss of baseline habitats was calculated by overlaying the footprint of the proposals onto the On-Site Baseline Map.

[12] The 'condition' of the habitat is a measure of habitat quality and measures the 'working-order' of the habitat against the optimal state of the habitat type.
[13] Strategic significant is based upon the location of a habitat within the local landscape and whether the location has been formally identified in plans which identify local priorities for targeting biodiversity.

- The On-site Post Intervention Map was reviewed to identify habitats retained, enhanced, and/or created. The proposed habitats were subject to condition and strategic significance assessments.
- Where a new habitat or existing habitat has been created or enhanced, additional consideration has been given towards the time taken for habitats to establish and reach target condition (temporal multiplier), and the difficulty of habitat re-creation (difficulty multiplier). The 'Habitat creation in advance' and 'Delay in starting habitat creation' functions were set to 0 years. No advanced habitat creation is proposed, and there will be no 'delay between habitat loss and the start of habitat creation and enhancement works'.

Strategic Significance

4.12 The Greater London Authority (GLA) is preparing a Local Nature Recovery Strategy (LNRS) for London. The LRNS is not yet published. It was assessed that the Site was not located within a strategically significant ecological area. The strategic significance of the habitats within the Site was assessed as 'Area/compensation not in local strategy/no local strategy'.

Data Summary and Discussion

4.13 The Statutory Biodiversity Metric presents a detailed summaries of the resultant biodiversity unit change, separated by habitat type.

4.14 A biodiversity unit change has been provided habitat units, hedgerow units, and watercourse units. However, caution has been applied when interpreting these numbers. It is important to note that BNG should assess habitats in isolation and any unit losses or gains considered in detail. This assessment includes consideration of the effect of the proposals on each habitat group, and like-for-like replacement within broad habitat groups.

4.15 The discussion also considers the wider context of the outline planning application, surrounding landscape, wider ecological functions not captured by the BNG assessment process, and socio-economic values of the development, as well as considering how the Proposed Development contributes towards nature conservation priorities at the local, regional, and national levels. This approach is guided by Principles 6 and 9 of BNG Good Practice Principles[6], along with **Principles 8 and 9** of The Statutory Biodiversity Metric:

> *"Principle 8 Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.*
>
> *…*
>
> *Principle 9 This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to:*
>
> *• maintain habitat extent - supporting more, bigger, better, and more joined up ecological networks*

• ensure that proposed or retained habitat parcels are of sufficient size for ecological function"

4.16 Our digital data and mapping files are available upon request.

Limitations, Assumptions, and Clarifications

Limitations

4.17 The measurements within this report are approximate and the mapping of baseline habitats and proposed development plans has relied upon the plans provided by the client and/or project team. These plans were georeferenced. Mapping of habitats at a fine scale may result in minor deviations from realised measurements. Given the scale of the proposals, any deviations in spatial areas or point locations are sufficiently minor to be inconsequential. Nevertheless, this has been controlled for via advanced digitising tools and precautionary rounding.

4.18 The survey was undertaken in Winter, which is outside the optimum survey season for botanical surveys. Although the survey was undertaken in Winter, the evaluation and habitat descriptions (and hence the impacts and their significance), are considered to be accurate for the following reasons:

- Given the type of vegetation and habitats present, the valuation of the intrinsic interest is considered unlikely to change.
- Access was possible to all areas of the Site and the vegetation was clearly visible.
- Data was available from a previous assessment at the Site.
- This limitation has been accounted for within the condition assessments of the habitats within the Site.

Assumptions

4.19 Two trees had been previously removed. It has been assumed that one tree removed from the Site had Diameter at Breast Height (DBH) of between 30cm and 60cm. It is likely that the tree did not have DBH of 60+cm. It was reasoned that the tree may have had DBH of less than 30cm. If the tree was assumed to have had a DBH of less than 30cm then this would have scoped the trees out of the assessment. Scoping the trees out of the assessment was considered not to be precautionary. Based on **Photograph 1** from the Sales Brochure[14] of the Site, it has been assumed that one tree removed from the Site had Diameter at Breast Height (DBH) of less than 30cm. The tree was scoped out of the assessment.

[14] Provided by the client: *Knight Frank: Manor Lodge, Rickmansworth Road, Northwood HA6: Freehold development. Sales brochure.*

Photograph 1. Tree removed from the Site

Clarifications

4.20 The native hedgerow at the front of the Site has merged with a non-native conifer hedge resulting in a single merged feature. To avoid under recording biodiversity, this linear features has been recorded as a native hedgerow.

4.21 All trees within the baseline were treated as garden in line with the DBHs.

Contributor Information

4.22 The Site visit, BNG Condition Assessments, BNG Assessment, and BNG report were completed by Greg Nightingale. Technical review of this assessment was undertaken by Greg Nightingale. **Table 1** outlines the relevant experience of the assessment contributor.

Contributor	Experience
Greg Nightingale BSc (Hons) MCIEEM	Greg is the Director of Luscinia Ecology with over 11 years of experience in ecology and environmental management in the private sector. Luscinia Ecology is a CIEEM Registered Practice and Greg Nightingale is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). CIEEM act to govern best practice in the ecology sector. Greg has been working on BNG since 2017, prior to its inclusion within the National Planning Policy Framework (2018 revision) and the Environment Act 2021. This has included working with all the Defra Metrics, The Warwickshire Model, BREEAM 2018, and the Network Rail BNG Model. Greg has established and developed BNG systems and processes in three small to medium sized ecological consultancies and is highly experienced in the application of BNG at the site and local level, including delivering BNG offsetting and contributions via S106 Agreements, third parties, and brokers. As part of this, Greg is experienced in Phase 1 Habitat classification, UK Habitat Classification, and BNG condition assessment. This includes the completion of the industry standard training courses for BNG, UK Habitat Classification, and the crossover training for BNG and UK Habitat Classification. He is an accredited Modular River Survey River Condition Assessment surveyor. His experience has also included habitat mapping and assessment via drones and aerial footage. In addition, he has completed a CIEEM training course on Environmental Net Gain and has a foundational understanding of The Environmental Benefits from Nature Tool and how this relates to the BNG assessment process.

Table 1. Contributor experience

Chapter 5: Baseline and Proposed Development

Irreplaceable habitats

5.1 No irreplaceable habitats will be removed as a result of the Proposed Development.

Baseline Assessment

5.2 The habitats present within the Site are set out below:

- **Heathland and shrub**: Bramble scrub
- **Hedgerow**: Native hedgerow
- **Urban**: Artificial unvegetated, unsealed surface
- **Urban**: Developed land; sealed surface
- **Urban**: Vegetated garden

5.3 The assessment of the character, extent, condition, historic management, and species composition of these habitats is outlined within the EA[1] and the condition assessment tables within **Appendix B**.

5.4 Heathland and shrub: Bramble scrub, Urban: Artificial unvegetated, unsealed surface, and Urban: Developed land; sealed surface do not require condition assessment.

Proposed Development Assessment

5.5 The below is based on the On-site Post Intervention Map shown in **Figure 6**. Assessment of the proposals is split into three sections, as detailed below:

- Retained/Lost habitats, which identifies habitats retained and protected during the implementation of the proposals and those to be removed.
- Enhanced Habitats, which assesses habitats which will be created as part of the proposals, and outlines measures as to how these habitats will reach target condition.
- Created Habitats, which assesses habitats which will be created as part of the proposals, and outlines measures as to how these habitats will reach target condition.

Habitats Retained/Lost

5.6 Areas of vegetated garden will be retained (reinstated within two years in the same location and in the same condition). The native hedgerow will be removed. Two garden trees will be retained. The remaining habitats will be lost.

Habitats Enhanced

5.7 None.

Habitats Created

5.8 The Proposed Development will provide the following:

- **Heathland and shrub**: Mixed scrub
- **Individual trees**: Urban tree
- **Urban**: Developed land; sealed surface
- **Urban**: Introduced shrub
- **Urban**: Other green roof
- **Urban**: Vegetated garden

5.9 None of the created habitats were considered to be On-site significant Enhancements.

Heathland and shrub: Mixed scrub

5.10 Mixed scrub will be provided within the Proposed Development. This will be at the frontage of the Site. The habitat will be planted with native tree and shrub species. In time, the scrub will be over 80% native and will include a variety of woody species. As part of the management programme, invasive and non-native species will be removed and a varied age range will develop. A 'Moderate' condition can reasonably be achieved. However, a 'Fairly Poor' condition has been targeted as a precaution.

Individual trees: Urban tree

5.11 Tree planting is included within the Proposed Development across the new landscaping and outside of private curtilages. A moderate condition for the trees located in sustainable locations can reasonably be achieved. Criteria relating to native species, continuous tree canopy, good health, and oversailing vegetation can reasonably be met.

Urban: Developed land; sealed surface

5.12 This habitat is not discussed further as it is of negligible importance and does not require a condition assessment.

Urban: introduced planting

5.13 This habitat is not discussed further as it does not require a condition assessment.

Urban: Other green roof

5.14 This habitat is not discussed further as it does not require a condition assessment.

Urban: Vegetated garden

5.15 This habitat is not discussed further as it does not require a condition assessment.

Chapter 6: Results and Summary

6.1 Decision making during the development of the proposals has been informed and influenced by the Biodiversity Net Gain: Good Practice Principles for Development guidance[6] to ensure these obligations for achieving BNG have been met. In addition, throughout the construction of the Proposed Development, these principles will be adhered to.

Results

6.2 The headline results demonstrate a net gain of 0.04 hedgerow units (+35.10%) and a net loss of 0.11 habitat units (-25.12%) with the Trading Rules not met due to the overall loss of habitat units, including tree units (**Figure 7**). As there are no watercourse units in the baseline, there is no requirement to provide a net gain in these units.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-0.11
	Hedgerow units	0.04
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-25.12%
	Hedgerow units	35.10%
	Watercourse units	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

Figure 7. Headline results of The Statutory Biodiversity Metric

Biodiversity Gain Hierarchy

6.3 Following the Biodiversity Gain Hierarchy:

- **Avoidance**: The Proposed Development will be located on a previously developed Site.
- **Avoidance**: The Proposed Development will not remove any irreplaceable habitats, or habitats of very high, or high distinctiveness.
- **Enhancement**: An existing hedgerow will be retained. No other habitats were suitable for enhancement given the context of the Site and the size and layout of the Proposed Development.
- **Creation**: Opportunities for habitat creation have been explored and realistic opportunities and interventions have been agreed.
- **Offsetting**: Offsetting will be required.

Summary

6.4 The Proposed Development will meet legislation and policy requirements in relation to Biodiversity Net Gain via the Biodiversity Offsetting process. A total of 0.15 habitat units, including 0.02 tree units will be required.

6.5 The measures within this report should be secured by a condition for a Habitat Maintenance and Monitoring Plan.

Appendix A: Delivery of Good Practice Principles

BNG Principle	Application
Principle 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.* **Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere** *Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.* **Principle 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 and share the benefits fairly among stakeholders.*	The Proposed Development is located on a previously developed site which supports low quality and readily replaceable habitats. The Mitigation Hierarchy and the Biodiversity Gain Hierarchy have been applied since the instruction of an ecologist. The majority of the features of ecological importance within the Site will be retained and enhanced as part of the Proposed Development. There will be no loss of irreplaceable habitats and the habitats lost are replaceable or were unnatural/modified in nature. Engagement with stakeholders, including local residents and the Local Planning Authority will be undertaken as part of the planning application.
Principle 4. Address risks *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 the losses occurring and the gains being fully realised.*	Any limitations from the habitat survey and previous survey work have been considered and the precautionary principle applied during the baseline and proposed assessment where required. The Proposed Development assessment primarily uses basic habitats which require limited management to achieve the proposed outcomes. There is a clear statement in relation to the outcome of the Trading Rules. All other risks are dealt with via the Ecological Impact Assessment process and/or planning conditions, where considered required.
Principle 5. Make a measurable Net Gain *Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.*	The Statutory Biodiversity Metric has been used. Use of the 'Environmental Benefits from Nature Tool' to consider ecosystem services is not yet part of policy and voluntary use was not considered proportionate to the nature and scope of this Proposed Development.
Principle 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.* **Principle 7. Be additional** *Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).*	The loss of ecologically important habitats has been avoided. The BNG assessment process will ensure that the ecological compensation provided is ecologically equivalent in type, amount, and condition. The Trading Rules will be met via the biodiversity offsetting process. The local environment and local wildlife priorities have been considered through the Ecological Impact Assessment process, namely via the provision of enhancement which target NERC/BAP species. The additionality principle has not been contravened.
Principle 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.* • *Supporting local-level management of Net Gain activities.*	Engagement with stakeholders, including local residents and the Local Planning Authority will be undertaken as part of the planning application. New landscaping and structural planting are proposed, and this includes species rich lawns, native tree planting, and hedgerow enhancement. These measures will increase the level of greenspace within the Site, the habitat structure, the interconnectivity of the Site and surrounding areas, and the overall species diversity within the Site. This will provide increases in opportunities for wildlife. The overall impact on habitats from the Proposed Development will be a significant positive via the biodiversity offsetting process. This will be the BNG legacy of the Site.
Principle 9. Optimise Sustainability *Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.*	Use of the 'Environmental Benefits from Nature Tool' to consider ecosystem services is not yet part of policy and voluntary use was not considered proportionate to the nature and scope of this Proposed Development.

Principle 10. Be transparent *Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.*	The surveys and data that underpin this assessment have been made clear, including any limitations and assumptions. The methods used in this assessment are clearly set out in the method and follows guidelines. The assessment outcomes have been explained in full. This includes the inclusion of notes within the excel file to explain reasoning and full explanations for how existing and proposed habitat conditions will be achieved. Next steps, and the measures required to ensure this Biodiversity Net Gain Assessment outcome will be achieved, have been clearly set out within the Summary and Discussion. This includes a statement that outlines the recommended next steps. All requirements within this report have been discussed and agreed with the Applicant.

Appendix B: Condition Assessment Tables

UKHabs Classification:		**Hedgerow**: Native Hedgerow
Condition Sheet: Survey Date and Surveyor:		Hedgerow Habitat Types 17/12/2024 – Greg Nightingale
Functional groupings	**Criteria (the minimum requirements for 'favourable condition'**	**Description**
A1: Height	>1.5 m average along length.	The average height of woody growth estimated from base of stem to the top of the shoots, excluding any bank beneath the hedgerow, any gaps or isolated trees. Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice). A newly planted hedgerow does not pass this criterion (unless it is >1.5 m height).
A2: Width	>1.5 m average along length.	The average width of woody growth estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths (such as blackthorn suckers) are only included in the width estimate when they are >0.5 m in height. Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice).
B1: Gap – Hedge base	Gap between ground and base of canopy <0.5 m for >90% of length.	This is the vertical 'gappiness' of the woody component of the hedgerow, and its distance from the ground to the lowest leafy growth. Certain exceptions to this criterion are acceptable (see page 65 of the Hedgerow Survey Handbook).
B2: Gap - hedge canopy continuity	Gaps make up <10% of total length; and No canopy gaps >5 m.	This is the horizontal 'gappiness' of the woody component of the hedgerow. Gaps are complete breaks in the woody canopy (no matter how small). Access points and gates contribute to the overall 'gappiness' but are not subject to the >5 m criterion (as this is the typical size of a gate).
C1: Undisturbed ground and perennial vegetation	>1 m 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 is the level of disturbance (excluding wildlife disturbance) at the base of the hedgerow. Undisturbed ground is present for at least 90% of the hedgerow length, greater than 1 m in width and must be present along at least one side of the hedgerow. This criterion recognises the value of the hedgerow base as a boundary habitat with the capacity to support a wide range of species. Cultivation, heavily trodden footpaths, poached ground etc. can limit available habitat niches.
C2: Nutrient-enriched perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground.	The indicator species used are nettle, cleavers, and docks. Their presence, either singly or together, does not exceed the 20% cover threshold.
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 WCA) and recently introduced species.	Recently introduced species refer to plants that have naturalised in the UK since AD 1500 (neophytes). Archaeophytes count as natives. For information on archaeophytes and neophytes see the JNCC website, as well as the BSBI website where the 'Online Atlas of the British and Irish Flora' contains an up-to-date list of the status of species. For information on invasive non-native species see the GB Non-Native Secretariat website.
D2: Current damage	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities.	This criterion addresses damaging activities that may have led to or lead to deterioration in other attributes. This could include evidence of pollution, piles of manure or rubble, or inappropriate management practices (e.g., excessive hedgerow cutting).
E1: Tree class	There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and or ancient), and there is on average at least one mature, ancient or veteran tree present per 20 - 50m of hedgerow.	This criterion addresses if there are a range of age-classes or morphologies which allow for replacement of trees and provide opportunities for different species.
E2: Tree health	At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	This criterion identifies if the trees are subject to damage which compromises the survival and health of the individual specimens.
Condition categories for hedgerows without trees		
Good	No more than 2 failures in total; AND No more than 1 in any functional group.	
Moderate	No more than 4 failures in total; AND Does not fail both attributes in more than one functional group.	
Poor	Fails a total of more than 4 attributes; OR Fails both attributes in more than one functional group.	
Condition categories for hedgerows with trees		
Good	No more than 2 failures in total; AND No more than 1 failure in any functional group.	
Moderate	No more than 5 failures in total; AND Does not fail both attributes in more than one functional group.	
Poor	Fails a total of more than 5 attributes; OR Fails both attributes in more than one functional group.	

Condition Assessment Outcome	
Functional groupings	**H1**
A1: Height	Pass
A2: Width	Fail
B1: Gap – Hedge base	Fail
B2: Gap – Hedge canopy	Pass
C1: Undisturbed ground and perennial vegetation	Pass
C2: Nutrient-enriched perennial vegetation	Fail
D1: Invasive and neophyte species	Pass
D2: Current damage	Fail
Outcome	**Moderate**

UKHabs Classification:		**Individual trees**: Urban trees	
Condition Sheet:		Individual trees Habitat Type	
Survey Date and Surveyor:		17/12/2024 – Greg Nightingale	
Condition Assessment Citeria		**TX1: 31 – 60 DBH TQ 08809 91173**	**TX2: 31 – 60 DBH TQ 08794 91175**
A	The tree is a native species (or at least 70% within the block are native species).	Pass - Assumed	Pass - Assumed
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).	Pass	Pass
C	The tree is mature (or more than 50% within the block are mature).	Pass - Assumed	Pass - Assumed
D	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.	Pass - Assumed	Pass - Assumed
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy, or loose bark.	Pass - Assumed	Pass - Assumed
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Pass - Assumed	Pass - Assumed
Criteria Assessment Outcome			
Passes 5 or 6 criteria.	Good	**Good**	
Passes 3 or 4 criteria.	Moderate		
Passes 2 or fewer criteria.	Poor		