Aval Consulting Group
CIVIL, ENVIRONMENT & STRUCTURAL ENGINEERS

Biodiversity Net Gain Assessment

34a Drayton Gardens, Uxbridge, UB7 7LG

BMR Property Group

23 January 2026

Project Information	
Title	Biodiversity Net Gain Assessment
Job Code	94588
Sector	Ecology
Report	BNG
Client	BMR Property Group
Revision	A
Status	Final
Date of Issue	23 January 2026

Revision History					
Revision	**Date**	**Author**	**Reviewer**	**Approver**	**Status**
A	23 January 2026	NR	EB	SC	Final

Disclaimer

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party. This report may include data obtained from trusted third-party consultants that have been supplied to us in good faith. Whilst we do everything we can to ensure the quality of all the data we use, we cannot be held responsible for the accuracy or integrity of third party data.

Table of Contents

1 Summary

This report provides a Biodiversity Net Gain assessment for the proposed development at 34a Drayton Gardens, Uxbridge, UB7 7LG. Grid Reference TQ 06055 79758.

The scheme offers ecological improvements to the site through the replacement of developed land with garden space.

The proposed changes resulted in an on-site change of +0.13 area units (Gain), with trading rules satisfied as a result of the Proposed Development. As the site presents 0 units at baseline, this post-development gain in area units is considered to satisfy the development's BNG requirements.

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

Table 1. Headline Results

Habitat Type	Baseline units	Post-development units	Unit change	Unit change (in percentage)
Area Habitats	0.00	0.013	**+0.013**	N/A
Hedgerows	0.00	0.00	+0.00	+0.00%
Watercourses	0.00	0.00	+0.00	+0.00%

2 Introduction

2.1 Overview

BMR Property Group ('the client') is seeking consent for a proposed development at 34a Drayton Gardens, Uxbridge UB7 7LG (hereafter referred to as the 'proposed development site'), which is within the London Borough of Hillingdon.

This report has been prepared on behalf of BMR Property Group in support of an application for the redevelopment of a vacant plot with the construction of a residential dwelling with associated hardstanding and garden space.

AVAL Consulting Group Limited (ACGL) was instructed by the client to produce a Biodiversity Net Gain Assessment to accompany the planning application to the London Borough of Hillingdon for consent to undertake the proposed work. Major developments are required to submit a Biodiversity Net Gain Assessment demonstrating biodiversity enhancements that contribute to the objectives of the latest Hillingdon Local Plan (2012) as well as the London Plan (2021).

The report was prepared by Nathan Roberts MSc (Ecological Consultant with background in freelance BNG consultancy)

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

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

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

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

2.2 Objectives

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

3 Legislation and Policy

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

3.1 Relevant Policy and Legislation

Existing Government policy for England on BNG is set out in the National Planning Policy Framework (Ministry of Housing, Communities and Local Government, December 2024). Paragraph 8 of the National Planning Policy Framework (NPPF) states: "Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)". One of these is an environmental objective: "to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

Section 15 of the NPPF, "Conserving and enhancing the natural environment", is considered particularly relevant. In paragraph 187 the following statement is made: "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."

Paragraph 192 states that: "To protect and enhance biodiversity and geodiversity", plans should:

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

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

Paragraph 193 states that: "When determining planning applications, local planning authorities should apply the following principles:

- *"if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *"development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely*

impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- *"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *"development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access where this is appropriate."*

3.1.1 The Environment Act 2021

As a result of the Environment Act 2021, Schedule 14 makes provision for conditions to secure the biodiversity gain objective. Paragraph 2 sets out the biodiversity gain objective as:

1. The biodiversity gain objective is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.
2. The biodiversity value attributable to the development is the total of — (a) the post-development biodiversity value of the onsite habitat, (b) the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and (c) the biodiversity value of any biodiversity credits purchased for the development.
3. The relevant percentage is 10%.
4. The Secretary of State may by regulations amend this paragraph so as to change the relevant percentage.

3.1.2 Local Policy

The Hillingdon Local Plan (2012) includes details on the council's approach to biodiversity in policy EM7: Biodiversity and Geological Conservation.

Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to:

[…]

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

The Local Plan Part 2 (2020) also builds upon this approach in greater detail:

6.27 All development proposals should ensure the protection of biodiversity and aspire to include enhancement measures. The Council is particularly concerned by the loss of habitats that support non-protected species. The Council recognises the importance of all features and will seek to retain and enhance as much as possible on-site. If this is not possible then specific areas of the site will be allocated to wildlife creation accompanied by a

clear management plan, and only as a last resort will the Council seek off-site compensation. If none of these can be provided then the Council will refuse the planning application.

6.28 It is important that planning decisions are appropriately informed by the right level of survey and information on ecology features. The Council will apply Natural England's standing advice at validation stage. Applications will only be validated if they have the appropriate information. Where initial assessments recommend further surveys, these will be expected to be provided as part of a planning submission. All ecological reports or information submitted should adhere to nationally accepted best practice survey standards and be consistent with the British Standard BS 42020: 2013 Biodiversity – Code of Practice for Planning and Development or an updated variation. Where appropriate, the Council will require the use of the approved DEFRA biodiversity impact calculator (as updated) to inform decisions on no net loss and net gain.

[…]

Policy DMEI 7: Biodiversity Protection and Enhancement

A) The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.

B) If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.

C) All development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements.

D) Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused

In line with the national statutory requirement, a 10% net gain is expected in the Hillingdon area.

4 Methodology

4.1 Strategic Significance

One of the factors which affects the value of habitats in BNG is Strategic Significance. According to the Statutory Biodiversity Metric (SBM) User Guide (DEFRA, 2024), Strategic Significance is the ecological significance of a habitat based on its location and specific habitat type. This aspect affects the value of habitats within the metric, for example, a habitat which is rare or specifically valued in a certain region produces more biodiversity units. Each Strategic Significance score is associated with a multiplier which increases a habitat's biodiversity units. Table 1 sets out how Strategic Significance is assigned to habitats using local policy documents.

The Environment Act 2021 requires responsible authorities across the whole of England to prepare and publish Local Nature Recovery Strategies (LNRS) (UK Govt 2021, §104). Where published, these documents, and the regional biodiversity priorities they contain, must be used to assign strategic significance. The LNRS for Greater London is yet to be published at the time of writing this report.

Following best practice, local policy documents have been used as a substitute to LNRS in this report, including:

- The London Plan (2021)
- Hillingdon Council's Strategic Climate Action Plan (2021)

Table 2. Strategic Significance Guidance.

Strategic Significance	Description (from the SBM User Guide)
High	The habitat type is mapped and described as locally ecologically important within a specific location, within documents specified by the relevant planning authority. If your project delivers the mapped habitat creation, enhancement or actions set out within specified alternative* documents, or enhances an existing habitat identified within specified alternative documents as locally ecologically important, strategic significance can be recorded as high in the post-intervention sheets. If the specified alternative documents identify existing habitat as locally ecologically important within a specified location, strategic significance may be recorded as high in the baseline. You should record the name of the plan the relevant planning authority has specified in the user comments and record that you have used the specified document in your gain plan.

Medium	This category can be applied when the LPA has not identified a suitable document for assessing strategic significance. Users should: • explain how the habitat type is ecologically important within a specific location • demonstrate the importance of that habitat in providing ecological linkage to other strategically significant locations • use professional judgement When the above criteria are met, strategic significance may be recorded as medium in the baseline and postintervention sheets.
Low	Where the definitions for high or medium strategic significance are not met.

*'Alternative documents' refers here to local policy documents used where a LNRS has not yet been published.

No prior ecological surveys or reports concerning the site, or adjacent sites, have been reviewed in relation to this report.

3.2. Field Survey

3.2.1. Surveyors and Survey Conditions

The baseline survey was carried out by Natalie Boote ACIEEM (Consultant Ecologist with over a decade's worth of experience) and Evan Browne MSc (Ecologist).

The survey was undertaken at 11 on 23rd February 2026. The temperature was recorded as 10°C, and fine, dry weather conditions.

3.2.2. BNG Baseline Survey

A BNG Baseline Survey was conducted to determine the habitat types present on site and their relative composition and distribution. This involved a walk-over survey of all habitats on site, generating a floral species list for each habitat type by recording floral species cover and composition using the DAFOR scale (results present in the accompanying Preliminary Ecological Appraisal). Any indicator species and/or Non-native Invasive Species (NNIS) present on site were also flagged within these species lists. The habitats present on site were then classified according to the UKHabs system, and where relevant, were also assigned BNG-specific classifications. The distribution and extent of habitats on site were mapped using QGIS and this data was later digitised to produce a BNG Baseline Habitat Plan (Appendix A).

3.3. BNG Mapping

Mapping and habitat information from the field survey was digitised using QGIS (Version 3.34.7), OS mapping data, and satellite imagery provided by Good Satellite, to generate a BNG Baseline Habitat Plan (Appendix A). Any maps or data provided by the client that were considered suitable were also used as part of this process. For example, a site boundary

map provided by the client was georeferenced into the QGIS tool in order to draw the site's Red Line Boundary.

Maps showing the post-development maps were also generated using the QGIS software and any relevant plugins (Appendix B).

QGIS was also used to calculate accurate area and length measurements for each of the on-site habitats. These measurements were inputted directly into the Small Sites Metric.

3.4. Metric Calculations

The Small Sites Metric (SSM) was the official tool for carrying out small site BNG assessments at the time of this report.

The SSM tool uses biodiversity units as its measurement of biodiversity, and these are split into three types within the metric, these being area habitat units, hedgerow units, and watercourse units. These unit types are treated distinctly within the metric. For example, the creation of a hedgerow on a site would produce hedgerow units and may contribute to a net gain for hedgerow habitats, however this does not affect the area or watercourse habitat types or their corresponding unit values, which may require their own enhancement and creation works in order to achieve BNG requirements.

In order to achieve net gain, several rules must be satisfied. These include the satisfaction of trading rules, a distinct net gain for all relevant unit types (i.e. area habitats, hedgerows, and watercourses), and the correct use of the SSM.

3.5. Limitations

Any desk study data provided by a third party has not been independently verified by Aval Consulting Group Ltd.

Every effort was made to make a full assessment of the site, record all floral species and categorise all habitat types; however, it cannot be assumed that the data collected during the field survey is comprehensive. This is due to the fluctuating and transient nature of ecology. However, the data collected is considered sufficient to provide an accurate assessment of the on-site habitats and their associated value.

The following factors have been identified which have the potential to limit the accuracy of the results outlined within this report:

- The survey was carried out outside of the optimal botanical survey period (April-September), however the vacant and developed context of the site justified this.

5 Baseline Habitats

The site currently consists of a vacant plot of land, which leads up from Drayton Gardens road with a compacted aggregate path and leads to hardstanding where cars park, as well as a disused garden space covered in tarpaulin, and through which some ornamental plants (dead at the time of survey) grow through.

The following UKHab and/or BNG-specific habitat classifications, alongside their respective conditions, have been assigned to the site:

- Developed Land; Sealed Surface - Condition N/A
- Artificial Unvegetated, Unsealed surface – Condition N/A

Please refer to the Preliminary Ecological Appraisal (Aval Consulting 2026) for further detail on these habitats and their respective species lists.

Please note that there is a slight discrepancy between the classification of the Artificial Unvegetated, Unsealed Surface in this BNG report and the accompanying Preliminary Ecological Appraisal (PEA), in which this habitat is classed as 'u1f – Sparsely Vegetated Urban Land'.

Sparsely Vegetated Urban Land is a more accurate description of the habitat, defined as "Urban land with vegetation cover 10–50%" within UKHab, however this classification is not available within BNG.

While "Ruderal or Ephemeral" was considered for use in this BNG assessment, the UKHab definition "Short patchy plant associations of ruderal or ephemeral species with ≥5% cover and perennial grass species <75% cover" does not apply, since the plants present on site were dominated >75% by grasses, and the rest of the plants were largely ornamental garden plants left from past land use, or persistent weeds, rather than ruderal species following disturbance. Therefore "u1c Artificial Unvegetated – Unsealed Surface" was considered to be the most accurate, with the UKHab definition "Land that has no or very low (<10%) cover of vegetation through direct or indirect human activity, and the soil surface is not sealed with impervious materials" more accurately matching the site's habitat than the ruderal classification.

The baseline habitat map can be found in Appendix A.

6 Proposed Habitats

6.1 Overview

The proposed development will see a single house with associated hardstanding and private garden space replace the entirety of the existing site.

The following habitats will be retained as part of the development:

- N/A

The following habitats will be enhanced as part of the development:

- N/A

The following habitats will be created as part of the development:

- Developed Land; Sealed Surface (house and surrounding hardstanding, parking space)
- Artificial Unvegetated, Unsealed Surface (track leading to and around house)
- Vegetated Garden

7 Biodiversity Net Gain

7.1 Calculation

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

The proposed changes resulted in an on-site change of +0.13 area units (Gain), with trading rules satisfied as a result of the Proposed Development.

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

Table 3. Headline Results

Habitat Type	Baseline units	Post-development units	Unit change	Unit change (in percentage)
Area Habitats	0.00	0.013	**+0.013**	N/A
Hedgerows	0.00	0.00	+0.00	+0.00%
Watercourses	0.00	0.00	+0.00	+0.00%

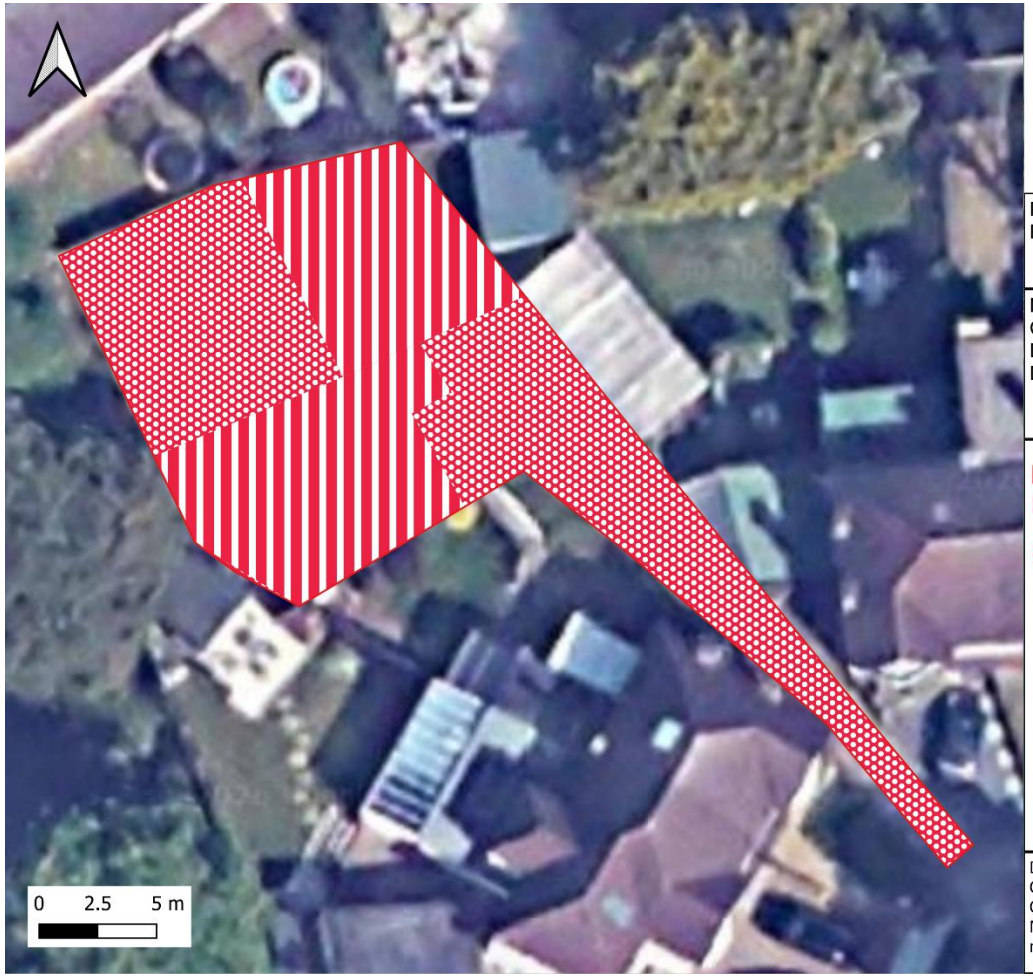
Note that the net gain percentage measurement does not apply here, because the site's baseline units are considered null within the Small Sites Metric.

Small Sites Metric tool results can be found alongside this report.

Appendices

Aval Consulting Group

Appendix A : Existing Site Habitats



Aval Consulting Group

Project Reference: 94588
Project Name: 34a Drayton Gardens

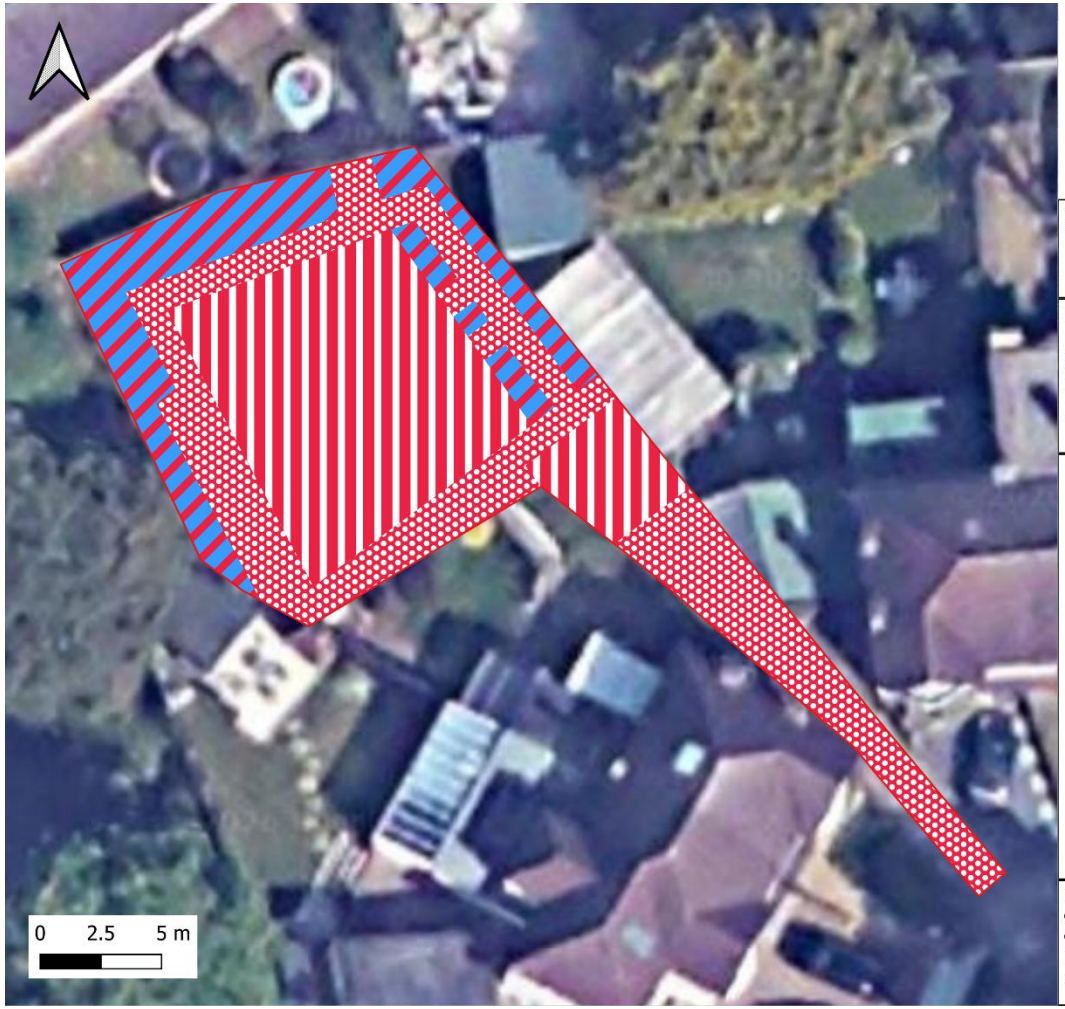
Map Title: Baseline Habitat Plan
Client: BMR Property Group
Drawn By: N.R.
Date Created: 23/01/26

Red Line Boundary
u1b - developed land; sealed surface
u1c - artificial unvegetated unsealed surface

Data Sources:
Google Satellite and © OpenStreetMap Contributors.
Map features are only representative and may not be to scale © Aval Consulting Group 2026

Aval Consulting Group

Appendix B : Proposed Site Habitats



Aval Consulting Group

Project Reference: 94588
Project Name: 34a Drayton Gardens

Map Title: Post-development Habitat Plan
Client: BMR Property Group
Drawn By: N.R.
Date Created: 23/01/26

- Red Line Boundary
- u1b - developed land; sealed surface
- u1c - artificial unvegetated unsealed surface
- 828 - vegetated garden

Data Sources:
Google Satellite and © OpenStreetMap Contributors.
Map features are only representative and may not be to scale © Aval Consulting Group 2026

Appendix C : Strategic Significance

The following table demonstrates how Strategic Significance was assigned to the site's baseline and post-development habitats in line with DEFRA's guidance for where the region's Local Nature Recovery Strategy is yet to be published.

Table A. Strategic Significance details

Habitat	Strategic Significance	Reason (if above Low)
Developed Land; Sealed Surface	Low	N/A (non-distinctive habitat)
Artificial Unvegetated, Unsealed Surface	Low	N/A (non-distinctive habitat)
Vegetated Garden	Low	N/A (non-distinctive habitat)