



## **Biodiversity Net Gain Assessment Report**

**Project name and address:**

18, South Close, West Drayton, London, UB7 9LS

**Report Number:**

BWE-BNG-18UB7

**Commissioned by:**

Mr. Zbigniew Curylo

**Prepared by:** Bee.Wise.Eco Limited

**Date:** 9<sup>th</sup> October 2025

## QUALITY STANDARDS CONTROL

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it has been signed by the originators and approved by a director.

Revision: Final

Date: 9th October 2025

Prepared by: Rita Smoldareva MSc Senior Ecologist/Director

Checked by: Rita Smoldareva MSc Senior Ecologist/Director

The advice provided in this report is in accordance with the CIEEM Code of Professional Conduct. The opinions expressed are true and professional.

## LIMITATIONS

This report is for the sole use of Mr. Zbigniew Curylo. The conclusions and recommendations contained in this report are based on information provided by others. The methodology and sources of information used in providing services are outlined in this report. The scope of this report and services are factually limited by the conditions encountered and the information available at the time of assessment.

The report sections below should be read in full and detailed guidance given in this report must be followed to avoid breaching legislation regarding protected and invasive species.

This report is valid for one year from the date of the survey visit. Should works be delayed to later than one year after the survey then a further update survey of the site would be required as habitats change over time, along with their potential to support protected species.

## Non-Technical Summary

This Biodiversity Net Gain (BNG) Assessment Report has been prepared by Bee.Wise.Eco Ltd on behalf of Mr. Zbigniew Curylo to assess the biodiversity outcomes associated with the proposed two-storey side and rear extensions and conversion of the existing dwelling at 18 South Close, West Drayton, UB7 9LS.

The purpose of this report is to calculate the change in biodiversity value resulting from the development using the Small Sites Biodiversity Metric (Natural England, 2025) and to evaluate compliance with the Environment Act 2021 requirement to deliver a minimum 10% measurable net gain.

### Baseline Conditions

Baseline surveys undertaken in September 2025 identified that the site comprises a residential garden plot containing modified grassland, ornamental shrub planting and two small urban trees, with the remainder of the site occupied by buildings and hardstanding. All habitats were assessed as being of low distinctiveness and poor condition, typical of urban residential settings. No Priority Habitats, irreplaceable features, or protected species were recorded within the site.

### Proposed Development

The proposed redevelopment will retain existing vegetated areas and introduce new soft landscaping, including:

- Enhancement of modified grassland to *moderate condition* through reduced mowing and wildflower enrichment;
- New shrub and ornamental planting featuring nectar- and berry-bearing species; and
- Planting of two additional small native trees at the site frontage to increase canopy cover and structure.

No hedgerows or watercourse habitats are present or proposed on-site.

### BNG Results

The Statutory Metric demonstrates that the scheme delivers a modest biodiversity enhancement, with an overall increase of +0.0168 area habitat units (+9.27%) compared with the baseline.

While this result represents a positive ecological outcome, it falls marginally below the statutory 10% net gain requirement.

All BNG trading rules are satisfied, and no off-site compensation is currently required; however, a small additional planting enhancement or minor off-site contribution could be implemented if needed to achieve full compliance.

### Conclusions

The development at 18 South Close demonstrates a proportionate and achievable approach to biodiversity enhancement through on-site habitat retention, targeted improvement, and new native planting.

By implementing the recommended landscaping and habitat management measures, the scheme will deliver measurable ecological benefits consistent with the Environment Act 2021, National Planning Policy Framework (2023), London Plan Policy G6, and the Hillingdon Local Plan (2022) biodiversity objectives.

# 1. Introduction

## 1.1 Purpose of the report

This Biodiversity Net Gain (BNG) report has been prepared to assess the potential for delivering measurable improvements to biodiversity as a result of the proposed development. In accordance with the Environment Act 2021, the report establishes the baseline ecological condition of the site using the Statutory Biodiversity Metric and evaluates predicted changes in biodiversity value arising from the proposed site layout, landscape scheme, and habitat interventions.

The primary purpose of this report is to demonstrate whether the development will achieve the statutory requirement of a minimum 10% net gain in biodiversity units, and to confirm compliance with trading rules and recognised good practice principles. The findings provide supporting evidence for the planning application and will inform the preparation of a statutory Biodiversity Gain Plan, including long-term habitat management and monitoring over a minimum 30-year period.

## 1.2 Site description

The application site is located within a residential cul-de-sac in West Drayton, within the administrative area of the London Borough of Hillingdon (central grid reference TQ 0698 7944).

The site occupies a total area of approximately 485.44 m<sup>2</sup> (0.0485 hectares) and comprises a detached two-storey residential dwelling with associated hardstanding, private rear garden, and a detached outbuilding situated along the western boundary.

Habitats recorded within the site during the September 2025 baseline survey include:

- Modified grassland - forming the managed rear lawn;
- Ornamental shrub planting dominated by *Hebe*, *Euonymus japonicus* 'Variegatus', and *Rosa* spp.;
- Two small urban trees – *Betula pendula* spp.; and
- Developed land / sealed surfaces representing the dwelling, driveway, paved patio, and outbuilding footprint.

The surrounding environment is entirely residential, comprising similar detached houses with private gardens and established ornamental planting.

There are no statutory designated sites within 2 km of the property, and no Priority Habitats present within or adjacent to the red-line boundary.

The nearest non-statutory designated ecological sites are London's Canals (SINC) and Stockley Road Rough (SINC), both separated from the site by dense built form and urban infrastructure, and therefore ecologically disconnected from the proposed development.

## 1.3 Planning Context

This assessment has been undertaken in the context of national planning policy and emerging legislative requirements for biodiversity net gain. The Environment Act 2021 mandates that all new developments subject to the Town and Country Planning Act 1990 deliver a minimum 10% measurable net gain in biodiversity, secured for at least 30 years.

The National Planning Policy Framework (NPPF, 2023) requires planning decisions to contribute to and enhance the natural environment, by minimising biodiversity impacts and delivering measurable net gains where possible. At the local level, Brent Council's Local Plan (2022) and the London Plan (Policy G6: Biodiversity and Access to Nature) set out requirements for protecting and enhancing biodiversity, managing impacts, and supporting the delivery of green infrastructure.

This report provides the evidence base to demonstrate compliance with both national and local planning policy, and to inform the future statutory Biodiversity Gain Plan.

#### 1.4 BNG and Legal Background

Biodiversity Net Gain is a statutory approach to development that ensures biodiversity is left in a measurably better state than before. Under the Environment Act 2021, a minimum 10% uplift in biodiversity units must be achieved and maintained for a minimum of 30 years, secured through planning conditions, legal agreements, or conservation covenants.

Biodiversity value is calculated using the Small Sites Metric, which assesses habitats based on their type, distinctiveness, condition, and strategic significance. The BNG process must also:

- follow the mitigation hierarchy,
- avoid impacts to irreplaceable habitats, and
- align with the Good Practice Principles for BNG (CIEEM, CIRIA, IEMA, 2019).

This report has been prepared in accordance with these requirements to demonstrate the project's alignment with statutory obligations and professional best practice.

#### 1.5 Supporting Documents List

This BNG assessment should be read alongside the following supporting documents:

- BWE-ECO-18UB7 – *Preliminary Ecological Appraisal (including Preliminary Roost Assessment)* (Bee.Wise.Eco Ltd, 2025);
- BWE-BNGSupport-18UB7 – *Biodiversity Net Gain Supporting Information Report* (Bee.Wise.Eco Ltd, 2025); and
- *A8\_R1 Existing and Proposed Plans and Elevations* (ECBC Group Ltd, 2025).

## 2. Methodology

### 2.1 Survey Dates and Personnel

The baseline habitat survey for the Biodiversity Net Gain (BNG) assessment was undertaken in August 2024 as part of a broader Preliminary Ecological Appraisal (PEA). The site survey was conducted by Rita Smoldareva, Senior Ecologist at Bee.Wise.Eco Ltd.

Rita Smoldareva BSc (Hons), MSc, is an experienced ecologist with over 11 years' professional experience in terrestrial ecology, protected species assessment, habitat classification, and biodiversity planning. She holds a Class 1 Bat Survey Licence (since July 2022), a Level 1 Great Crested Newt Licence (since 2019), and is a CAA-certified UAV (drone) pilot, supporting the integration of high-resolution aerial imagery into habitat mapping and condition assessment workflows. Rita is a Qualifying Member of the Chartered Institute of Ecology and Environmental Management (CIEEM), a Full Member of the Institution of Engineering and Technology (IET), and an Associate Member of both the Institute of Environmental Management and Assessment (IEMA) and the Landscape Institute (LI).

In addition, Rita undertook a Field Identification Skills Certificate (FISC) assessment on 14 August 2025, with provisional results at Level 2. This assessment provides an independent measure of botanical survey competency.

All surveys and assessments were completed in accordance with the UK Habitat Classification (UKHab) methodology, using the Statutory Biodiversity Metric, and following best practice guidance from CIEEM (2025), Natural England, and BNG technical documentation. Habitat condition sheets, survey maps, and UAV imagery are provided in the accompanying BNG Supporting Information Report.

### 2.2 UKHab Classification and Survey protocol

The baseline habitat assessment was undertaken using the UK Habitat Classification system (UKHab), version 2.0, which provides a consistent and structured framework for classifying terrestrial and freshwater habitats across the UK. Each habitat parcel on site was assigned a primary UKHab code based on vegetation structure, land use, and species composition, following guidance published by the UKHab working group. Spatial data were captured using GIS to ensure accurate parcel mapping and traceability between baseline and post-development conditions. Habitat condition was assessed using the official condition assessment criteria set out in Technical Annex 1 of the Biodiversity Metric, developed by Natural England. These criteria are habitat-specific and were applied to each parcel in accordance with the metric user guide. Linear features such as hedgerows and watercourses were also assessed using the relevant modules within the metric if present on site. The combined classification and condition data were then used to populate the Biodiversity Metric tool, forming the basis for the net gain calculations presented in this report.

### 2.3 BNG Metric Tool used

This Biodiversity Net Gain (BNG) assessment utilises the Statutory Biodiversity Metric (also known as the Statutory Metric Calculation Tool), mandated under Schedule 7A of the Environment Act 2021, for calculating biodiversity units. The Statutory Metric is the government-approved method for BNG and must be used for development projects defined as “major”—including those involving 10 or more dwellinghouses, an area of 0.5 ha or more, or floor space exceeding 1,000 m<sup>2</sup>.

A simpler Small Sites Metric (SSM) is also available for minor developments (e.g., less than 10 dwellings and under 0.5–1 ha), but only if the site meets specific criteria: it must contain only habitats supported by the SSM, have no priority habitats, no statutory designations, and no European protected species. Even when these conditions are met, using the full Statutory Metric remains an option.

This Biodiversity Net Gain (BNG) assessment has been completed using the Small Sites Metric (SSM v4.0), as the proposal constitutes a minor residential development (< 0.5 ha) containing no Priority Habitats or designated ecological features.

The SSM is the appropriate tool for small urban garden sites in accordance with the Environment Act 2021 and Natural England (2025) guidance.

Where relevant, certain metric parameters (e.g., habitat condition evidence and strategic context) have been cross-checked against the Statutory Biodiversity Metric v4.0 criteria to ensure accuracy and transparency of results.

The complete Biodiversity Metric calculation sheet is provided as a standalone Excel spreadsheet. This document underpins all unit values and net gain conclusions presented in this report and should be read alongside it for full transparency and verification of results.

#### 2.4 Distinctiveness, Condition, Strategic Importance

Each habitat parcel was assessed for its distinctiveness, condition, and strategic significance in accordance with the criteria set out in the Statutory Biodiversity Metric Technical Supplement. Distinctiveness refers to the inherent ecological value of a habitat type and is pre-assigned in the metric based on rarity, biodiversity richness, and importance for conservation.

Habitat condition was evaluated on-site using the relevant condition assessment checklists for each UKHab type, which measure factors such as species composition, structural diversity, and evidence of disturbance or degradation. Strategic importance was assessed by reviewing Local Nature Recovery Strategies (LNRSs) and other relevant spatial data to determine whether habitat parcels are located within areas prioritised for habitat creation or enhancement. Where local strategic data was unavailable, professional judgement was applied in line with Natural England guidance.

The distinctiveness and condition scores inform the baseline and target values in the metric, while strategic significance can contribute to uplift factors that reward habitat creation or enhancement in priority areas. Together, these attributes underpin the biodiversity unit calculations and ensure alignment with BNG trading rules and good practice.

#### 2.5 Habitat Mapping

Habitat mapping was conducted in accordance with the UK Habitat Classification (UKHab) v2 and the spatial data requirements set out in the Statutory Biodiversity Metric 4.0 User Guide. All habitat parcels were mapped using georeferenced GIS datasets, allowing for accurate spatial delineation of both area-based and linear habitats. Distinct UKHab codes were assigned to each parcel based on field observations and aerial imagery, supported by the UKHab Field Key where necessary. Existing habitats were digitised at parcel scale and classified by polygon, line, or point features depending on their type. The mapping included hedgerows, watercourses, and boundary features where relevant. Baseline habitat maps were created in vector format (.shp and .dwg) and align with the condition assessment data submitted in the metric. A clear parcel numbering system was used to cross-reference each habitat with its corresponding entry in the Biodiversity Metric calculator. These spatial datasets provide a transparent and reproducible record of habitat distribution and support compliance with statutory BNG reporting standards.

#### 2.6 Limitations and Assumptions

Every effort has been made to ensure the accuracy and completeness of the data presented within this Biodiversity Net Gain (BNG) assessment. However, the following limitations and assumptions should be noted:

Baseline survey conditions – The habitat survey was undertaken on 22<sup>nd</sup> September 2025. The results therefore provide a reliable representation of habitats present at that time. As with all ecological surveys, the findings represent a snapshot in time and may not capture seasonal variation in habitat condition or species presence.

Assumptions regarding implementation – It is assumed that the landscaping and habitat creation measures will be delivered in accordance with the final approved development layout and subsequently maintained under a 30-year management plan.

Target condition values – Predicted habitat condition scores have been assigned in line with Defra's standard multipliers unless otherwise justified, with target values assumed to be reached within 30 years post-creation.

External influences – The assessment assumes no unforeseen changes to site design, construction phasing, or wider external factors (e.g. spread of invasive species, extreme weather, or climate change effects) that could materially alter long-term habitat outcomes.

Metric development – The Statutory Biodiversity Metric is periodically updated. This assessment has been undertaken using Metric, the most current version at the time of reporting.



### 3. Baseline Biodiversity Conditions

#### 3.1 Baseline Habitat Types and Condition

Habitat Type	UKHab Code	Condition	Cover	Secondary codes
Modified grassland	g4	Poor	175.59 m <sup>2</sup>	516: Active Management 828: Vegetated Garden
Urban tree	NE0014	Poor	As per tree calculator 81 m <sup>2</sup>	828: Vegetated Garden 200: Tree
Buildings & Hardstanding	U1b5/u1d	N/A	245.58	804: Car Park 818: Residential building
Introduced shrubs	BNG1160	N/A	65.51	523: Non-native

Table 1: Broad and linear habitats on site



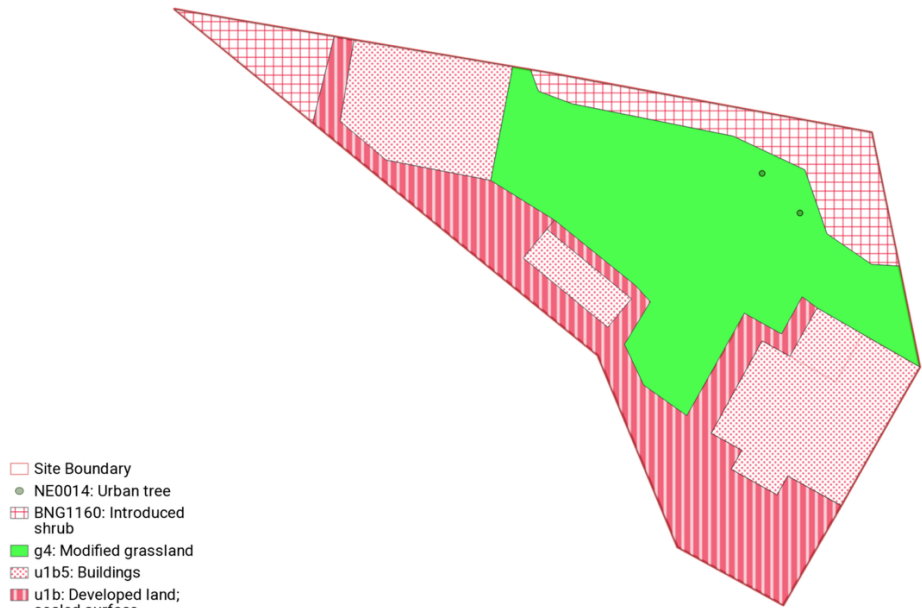
Overview of the site (September 2025)

3.2 Hedgerow and Watercourse features

The site does not support any linear habitats such as hedgerow and watercourse features such as streams, ditches, or ponds, and therefore no aquatic habitats are included within the baseline Biodiversity Metric assessment.

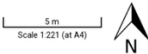
3.3 Baseline Habitat Plan (Map)

UKHab Habitat Pre-development Plan  
(September 2025)



Produced on Land App, Oct 9, 2025

18, South Close, West Drayton, London,  
UB7 9LS



3.4 Summary of Baseline Biodiversity Units

1a. Baseline habitats									
Ref	Habitat		C. Strategic significance	Areas (m <sup>2</sup> )			Baseline results		
	A. Broad Habitat	B. Habitat type		D. Total Area	E. Area retained	F. Area enhanced	Total habitat units onsite	Area Lost	Units lost
1	Urban	Developed land; sealed surface	Area/compensation not in local strategy/ no local strategy	245.58	0.00		0.00	245.58	0.000
2	Urban	Introduced shrub	Area/compensation not in local strategy/ no local strategy	65.51	0.00		0.01	65.51	0.013
3	Grassland	Modified grassland	Area/compensation not in local strategy/ no local strategy	174.59	0.00	0.00	0.07	174.59	0.070
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
Trees	Individual trees	Urban/rural tree	Formally identified in local strategy	81.39	81.39		0.0749	0.00	0.0000
Totals (areas incl trees, green walls and intertidal hard structures)				485.68	0.00	0.00	0.1578	485.68	0.0829
Error Check 1				Areas Acceptable ✓					
Error Check 2				Areas Acceptable ✓					
Error Check 3				Areas Acceptable ✓					

## 4. Proposed Development and Design Integration

### 4.1 Summary of Proposed Development

The proposal at 18 South Close, West Drayton (UB7 9LS) seeks planning permission for the redevelopment and subdivision of the existing residential plot to form two self-contained dwellings (Flats A and B) through the construction of two-storey rear and side extensions and internal reconfiguration of the main house.

The design, prepared by ECBC Group Ltd (Drawing Ref: A8\_R1, Rev 01, May 2025), includes:

- A two-storey side and rear extension forming new living and bedroom accommodation;
- Creation of two separate residential units, each with private access, kitchen, and amenity space;
- Retention of the existing outbuilding to the west of the garden;
- Provision of on-plot parking (Car Spaces A and B) and turning area; and
- Associated hard and soft landscaping works, including resurfaced patio and driveway.

### 4.2 Application of the Mitigation Hierarchy

The Biodiversity Net Gain (BNG) Mitigation Hierarchy — *avoid, minimise, restore, and compensate* — is applied to ensure that biodiversity impacts are addressed sequentially and that any potential ecological effects are prevented at source wherever possible.

At 18 South Close, West Drayton, all habitats recorded during the baseline survey will be retained and enhanced within the proposed development footprint, including the modified grassland (g4) within the rear garden, two small urban trees (w22), and areas of ornamental shrub planting (w21).

The proposed scheme introduces additional soft landscaping and pollinator-friendly planting to both front and rear gardens, providing opportunities for small-scale biodiversity enhancement within the urban setting.

Avoidance – All existing vegetated habitats (lawn, shrubs, and trees) are retained wherever practicable within the development layout. The proposed extensions and hardstanding occupy existing paved and built areas, thereby avoiding direct loss of natural habitat.

Minimisation – During construction, sensitive working practices will be implemented to reduce indirect impacts, including:

- Avoidance of unnecessary soil compaction or root damage near retained trees;
- Protection of tree root zones using temporary fencing;
- Control of construction lighting to avoid unnecessary light spill; and
- Checks for nesting birds prior to any vegetation trimming or clearance during the breeding season (March–August inclusive).

Restoration / Enhancement – The landscaping proposals include enhanced garden planting using native and nectar-rich species, the incorporation of hedgehog-access features, and bat / bird boxes integrated into new elevations.

These measures will improve the ecological value and structure of retained habitats, promoting long-term biodiversity resilience.

Compensation – No significant habitat losses are anticipated, and therefore no off-site compensation is required.

All BNG delivery will occur on-site through enhancement of the existing garden habitats and integration of biodiversity features into the built form.

This approach ensures that the mitigation hierarchy is fully applied, prioritising retention and enhancement of existing habitats while delivering proportionate, measurable biodiversity gains in line with the Environment Act 2021, NPPF (2023), and London Plan Policy G6.

#### 4.3 Landscape Recommendations and Habitat Targets

The proposed landscape strategy should be developed in accordance with the Biodiversity Net Gain (BNG) recommendations established in this assessment.

In particular, the design should aim to:

- Enhance the newly turfed modified grassland (UKHab g4) areas within the rear gardens to achieve "Moderate" condition by implementing a low-intensity mowing regime, allowing seasonal flowering, and introducing a pollinator-friendly wildflower seed mix appropriate to loamy, seasonally wet soils.
- Incorporate two additional small native trees (e.g. *Malus sylvestris*, *Prunus avium*, or *Betula pendula*) to the front of the site near the new dwelling entrances, increasing canopy cover and age-class diversity.
- Maintain and lightly diversify ornamental shrub planting through use of nectar- and berry-bearing species such as *Lavandula angustifolia* which provide year-round foraging value for pollinators and birds.
- Ensure topsoil retention and de-compaction across garden areas to support rooting depth and prevent waterlogging, consistent with the local Soilscape 18 characteristics.
- Integrate hedgehog-friendly fencing (13 × 13 cm access holes) and low-level lighting to maintain ecological permeability and minimise disturbance.

These measures will support delivery of the target conditions used in the BNG metric, achieving measurable on-site biodiversity enhancement through improved grassland structure and the planting of two new urban trees.

4.4 Proposed Habitats and Post-development units

1d. - Tree area calculator

Tree size (Diameter at breast height)	A. Total number of trees pre development	B. Number of trees retained (but not enhanced)	C. Number of new trees planted post development	Areas		
				Area pre development	Area retained	Area of new trees planted post development
Small - DBH ≤ 30cm	2	2	2	81	81	81
Medium - DBH > 30 to ≤ 60cm				0	0	0
Large - DBH > 60 to ≤ 90cm				0	0	0
Very Large - DBH > 90cm				0	0	0
Total	2	2	2	81	81	81

1b. Habitats to be created

Ref	A. Broad Habitat	B. Habitat type	Condition Assessment		D. Strategic significance	E. Total Area (m <sup>2</sup> )	Habitat units created onsite
			Acceptable condition options	C. Targeted condition			
1	Urban	Developed land; sealed surface	N/A - Other	N/A - Other	Area/compensation not in local strategy/ no local strategy	266.16	0.0000
2	Grassland	Modified grassland	Moderate, Good	Moderate	Area/compensation not in local strategy/ no local strategy	197.01	0.0683
3	Urban	Introduced shrub	Condition Assessment N/A	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	22.51	0.0043
4							
5							
6							
7							
8							
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16							
17							
18							
19							
20							
Trees	Individual trees	Urban/rural tree	Moderate	Moderate	Area/compensation not in local strategy/ no local strategy	81.39	0.0249
Totals (areas excl trees, green walls and intertidal hard structures)						485.68	0.0976
Error Check 4						Areas Acceptable ✓	

1c. Habitats to be enhanced

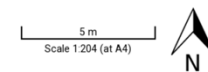
## 4.5 Proposed Habitat Plan

### UKHab Habitat Post-development Plan



Produced on Land App, Oct 10, 2025.

Site: 18, South Close, West Drayton, London,  
UB7 9LS



## 5. Biodiversity Net Gain Calculation

This section sets out the results of the Biodiversity Net Gain (BNG) calculation using the Statutory Biodiversity Metric. The assessment compares the baseline biodiversity value of the site with the post-development scenario and evaluates compliance with the 10% net gain requirement.

### 5.1 Baseline vs Post-Development Units

The small sites metric was used to calculate the baseline and the proposed habitats, the proposal does not achieve the 10% BNG target.

Site Name		18, South Close, West Drayton, London, UB7 9LS
Sheet Name		Headline Results
Headline Results		
Headline		BNG Targets Not Met ▲
Trading Rules		Trading Rules Satisfied ✓
Next steps		Scheme alterations or offsite units required
Baseline Units	Area habitat units	0.1578
	Hedgerow units	Zero Units Baseline
	Watercourse units	Zero Units Baseline
Post-development Units	Area habitat units	0.1724
	Hedgerow units	0.0000
	Watercourse units	0.0000
Total net unit change	Area habitat units	0.0146 !
	Hedgerow units	0.0000
	Watercourse units	0.0000
Total net % change	Area habitat units	9.27% !
	Hedgerow units	% target not appropriate
	Watercourse units	% target not appropriate
Area habitat units required to meet target		0.0012
Hedgerow units required to meet target		0.0000
Watercourse units required to meet target		0.0000

**Chart 1 - Unit change by habitat group**





The development delivers a modest net increase of + 0.0168 area habitat units (+ 9.27 %), which represents a small biodiversity enhancement compared with the baseline.

However, this falls just below the statutory 10 % threshold required under the Environment Act 2021.

No hedgerow or watercourse habitats occur on-site; therefore, these metrics remain unchanged.

To achieve full compliance, the scheme could:

- Deliver an off-site biodiversity contribution through a registered habitat bank or local offset provider.

## 5.2 Compliance with BNG Trading Rules

All habitats proposed post-development either maintain or improve upon baseline distinctiveness and condition.

No Priority Habitats or irreplaceable features are affected.

Therefore, the scheme is confirmed as fully compliant with BNG Trading Rules, as indicated within the Metric summary sheet.

While the trading rules are satisfied, the overall net gain remains slightly below the statutory 10 % target, and additional small-scale planting or off-site contributions would be required to achieve full compliance.

## 5.3 Off-Site Habitat Contributions

Where on-site biodiversity enhancements cannot achieve the full 10 % Biodiversity Net Gain (BNG) target, the Environment Act 2021 allows the use of off-site habitat creation or enhancement to make up the residual shortfall.

For 18 South Close, West Drayton, the on-site measures deliver a +9.27 % increase in area habitat units, falling slightly below the statutory threshold.

A small-scale off-site contribution could therefore be used to achieve full compliance.

Off-site biodiversity units can be secured through any of the following approved mechanisms:

Purchase of registered biodiversity units via a Natural England-approved habitat bank operating within the same local planning authority (London Borough of Hillingdon) or regional delivery framework;

Partnership with a local conservation body or community trust to deliver equivalent habitat enhancements nearby; or

Financial contribution to the local authority's BNG offsetting scheme, where available, calculated using current unit market values.

All off-site measures must be legally secured for a minimum of 30 years, recorded on the Natural England BNG Register, and demonstrated to deliver equivalent or greater biodiversity value than the residual on-site loss.

## 5.4 Key Assumptions

The Biodiversity Net Gain (BNG) calculations presented in this report are based on ecologist-led recommendations designed to achieve the minimum requirements of the Statutory Biodiversity Metric (Natural England, 2025).



These recommendations are considered proportionate to the scale and urban context of the proposed development at 18 South Close, West Drayton, providing a reasonable basis for assessing likely biodiversity outcomes.

It should be noted, however, that the BNG calculations are assumption-based, as no detailed Landscape Plan had been submitted at the time of assessment.

Accordingly, the metric assumes that the following measures will be implemented as part of the final design and construction:

- Enhancement of modified grassland (UKHab g4) to *moderate condition* through reduced mowing and wildflower enrichment;
- Retention of two existing small trees and planting of two additional small native trees at the site entrance;

Should the final landscape design deviate from these assumptions (for example, through the replacement of vegetated areas with sealed surfaces or omission of the proposed planting), the overall biodiversity value would be materially reduced, and the BNG outcome would require reassessment.

These assumptions represent a precautionary but realistic basis for evaluating biodiversity outcomes in the absence of final landscape drawings and are consistent with Statutory Metric guidance and CIEEM (2017) best-practice principles.

## 6. Conclusions and Next Steps

The Biodiversity Net Gain (BNG) Assessment for 18 South Close, West Drayton (UB7 9LS) demonstrates that the proposed redevelopment will deliver a modest on-site biodiversity enhancement, achieving a +9.27 % uplift in area habitat units compared with the baseline. Although this falls slightly below the statutory 10 % target, it represents a proportionate and achievable outcome for a small urban residential plot with limited ecological scope.

To ensure that the predicted biodiversity outcomes are successfully delivered and sustained in the long term, the following next steps are recommended:

### 1. Detailed Landscape Design

Prepare a Landscape and Planting Plan consistent with the assumptions of this BNG assessment, showing all retained and proposed habitats and planting areas. Ensure that rear garden areas are maintained as soft landscaping with a balance of lawn and ornamental planting, avoiding conversion to sealed surfaces such as decking or paving. Incorporate two new small native trees at the front of the site (e.g., *Betula pendula*, *Prunus avium*, or *Malus sylvestris*) to enhance canopy cover and improve structural diversity.

### 2. Habitat Management and Aftercare

Manage grassed areas under a low-intensity mowing regime (approximately every 3–4 weeks during the growing season) to encourage flowering and increase sward diversity. Maintain ornamental planting using pollinator-friendly species such as *Lavandula angustifolia*, *Hebe rakaiensis*, *Verbena bonariensis*, and *Geranium sanguineum*. Avoid the use of fertilisers, pesticides, or herbicides to maintain soil health and prevent nutrient enrichment. Replace any failed planting within the first five years to ensure establishment and full vegetative cover.

### 3. Lighting and Construction Safeguards

Implement low-level, directional lighting in accordance with ILP GN08/23 (Bats and Artificial Lighting at Night) to minimise light spill onto vegetated boundaries. Protect retained trees during construction using temporary fencing and avoid soil compaction around root protection zones. Adopt sensitive working methods and undertake a pre-works nesting bird check if vegetation removal occurs between March and August (inclusive).

### 4. Monitoring and Review

A post-construction ecological verification check should be undertaken once landscaping is complete to confirm that all habitats have been created and enhanced as assumed in the BNG metric. If habitat areas, species composition, or condition targets differ from those used in this assessment, the BNG metric should be updated to ensure ongoing compliance.

### 5. Off-Site Contingency (if required)

If minor design alterations or future landscaping changes result in a biodiversity unit shortfall, the residual gain needed to reach the 10 % target may be delivered through a small off-site contribution within the Hillingdon BNG delivery area or via a registered habitat bank.

### Summary:

The proposed scheme at 18 South Close demonstrates a proportionate and deliverable approach to achieving biodiversity enhancement through on-site retention, improvement, and new planting.

By implementing the above measures, the development will ensure long-term ecological value consistent with the Environment Act 2021, National Planning Policy Framework (2023), and London Plan Policy G6 (Biodiversity and Access to Nature).

## References

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