

SUEZ Recycling and Recovery UK Ltd  
Packington Gas Plant  
Railway Cutting  
Packington Lane  
Nr Meriden  
Coventry  
CV7 7HN  
[www.suez.co.uk](http://www.suez.co.uk)

29/09/2025

**BNG Exemption Statement – Suez Waste Transfer Station, Rigby Lane, Hayes, UB3 1ET**

Dear Sir/Madam,

At the request of Hillingdon Council, SUEZ Recycling and Recovery UK Ltd undertook a Biodiversity Net Gain (BNG) Assessment of proposals for the vehicle workshop and associated infrastructure at SUEZ Waste Transfer Station, Rigby Lane, Hayes, UB3 1ET.

The assessment was required to support a planning application for the addition of a workshop and associated infrastructure for the maintenance of vehicles. The BNG Assessment is informed by a habitat walkover survey undertaken by National Ecology Manager Dan Hunt BSc MSc MCIEEM, on 22<sup>nd</sup> September 2025. Although a full Ecological Impact Assessment was not undertaken, the presence of protected/notable species within the application site is considered extremely unlikely owing to the limited extent of the proposals and the nature of the on-site habitats.

During the habitat walkover survey, it was identified that the site comprised solely of concrete hardstanding storage area (developed land, sealed surface), with a small strip of gravel (artificial unvegetated, unsealed surface) measuring 1.6m wide by 7.5m long – see Site Photographs below. From aerial imagery it does not appear that the site has ever been fully vegetated.

Current legislation regarding compulsory BNG outlines that proposals which impact less than 25m<sup>2</sup> of on-site habitat are exempt from the 10% biodiversity net gain objective required by the Environment Act 2021<sup>1</sup>. The completed BNG assessment confirms that due to the lack of any natural surface on-site the proposed development at Rigby Lane does not impact any habitat and it is considered to meet the above threshold exemption. Full biodiversity metric calculations can be found within the appended metric (SUEZ Rigby Lane Hayes\_BNG Metric\_Sept 2025). Baseline (SUEZ Rigby Lane Hayes\_Baseline Habitat Plan\_Sept 2025) and post-development (Suez Rigby Lane Hayes\_Postdev Habitat Plan\_Sept 2025) habitat plans are also included with this exemption statement.

If you have any further questions please do not hesitate to get in touch.

Yours sincerely,

Dan Hunt MCIEEM  
National Ecology Manager, SUEZ Recycling and Recovery UK Ltd

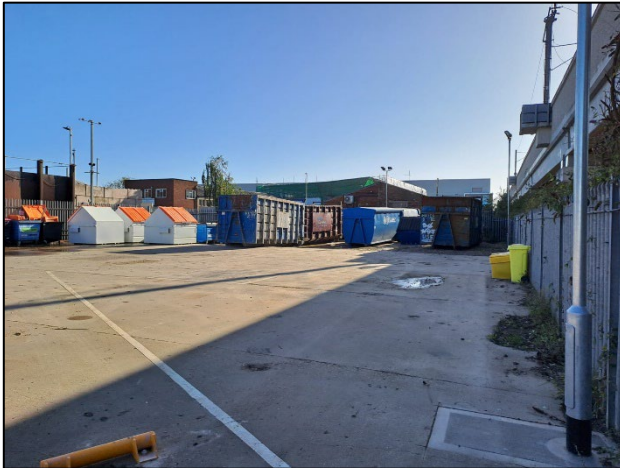
**Checked and approved by:**

Eleanor Crick  
Planning Manager, SUEZ Recycling and Recovery UK Ltd

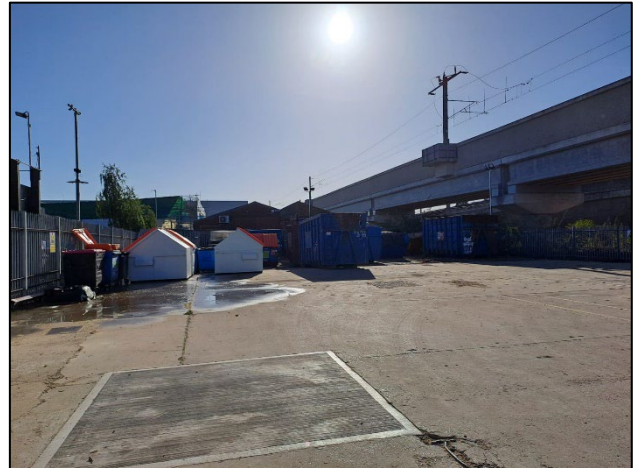
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<sup>1</sup> Department for Environment, Food & Rural Affairs (DEFRA) (2024) Biodiversity Net Gain: Exempt Developments. Available <https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>

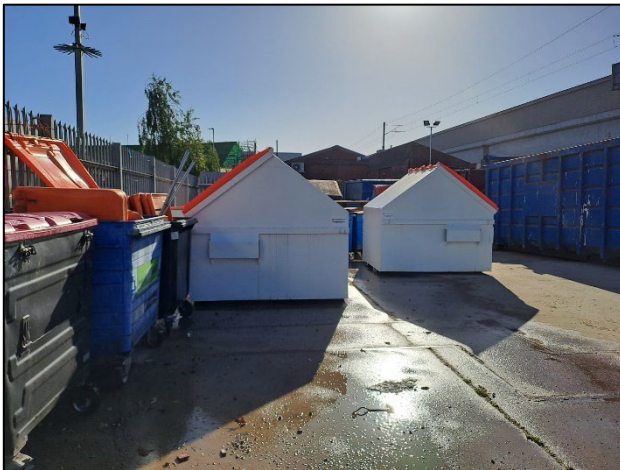
**Site Photographs:**



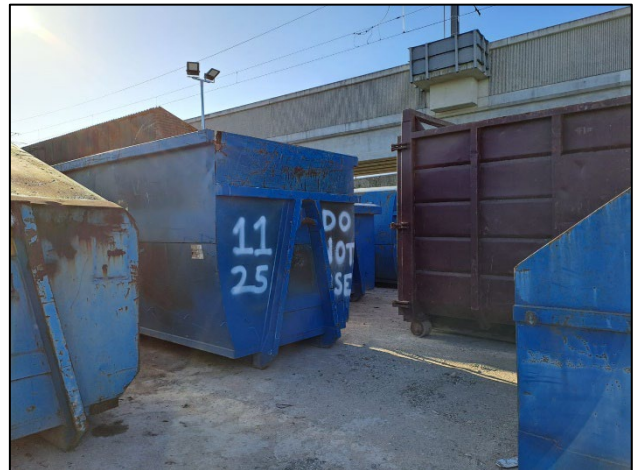
**Plate 1: Proposed workshop location**



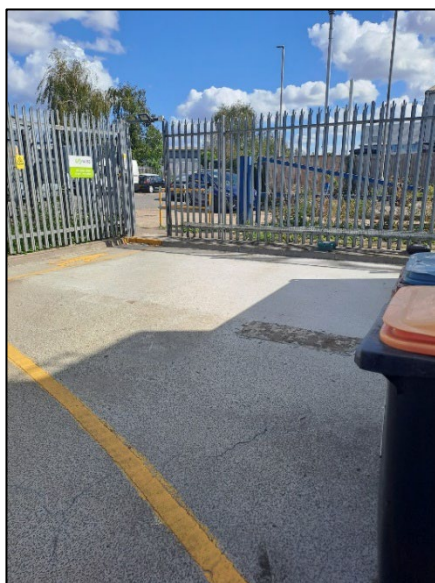
**Plate 2: Extensive concrete hardstanding**



**Plate 3: Skip storage on concrete hardstanding**



**Plate 4: Skip storage on concrete hardstanding**



**Plate 5: Bicycle storage location**



**Plate 6: Artificial unvegetated, unsealed surface**