



Link Park Road, West Drayton

Biodiversity Assessment and Net Gain Plan

KHC Management Services Limited

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Reviewed by	Paul Wolstenholme (Associate Director of Data Ecology)	Date:	23/06/2026
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Summary

Envance was commissioned by KHC Management Services Limited in May 2026 to undertake a biodiversity net gain assessment of a parcel of land located to the east of Link Park Road, West Drayton, UB7 7HA (National Grid Reference (NGR): TQ 05186 79286 hereafter referred to as the 'Site').

This report is to support a planning application for the proposal for a waste management facility comprising the treatment and recycling of metals, End of Life Vehicles (ELVs), new surfacing and drainage, a site office, and a weighbridge (hereafter referred to as the Development).

The Site is approximately 0.36 hectares in area. Habitats recorded within the Site are listed below:

- Artificial unvegetated; unsealed surface
- Developed land; sealed surface
- Other rivers and streams

The Proposed Development will not result in the loss, degradation, or alteration of any habitats. Although the Site boundary lies within 10 metres of Bigley Ditch and the watercourse is therefore included within the biodiversity metric assessment, no direct or indirect impacts to the watercourse are anticipated. As a result, there will be no loss of area-based or linear habitats, and the development meets the criteria for the *de minimis* exemption from mandatory Biodiversity Net Gain requirements. Consequently, the Proposed Development is not required to deliver a minimum 10% biodiversity net gain.

Biodiversity Value

The Site has an overall calculated baseline biodiversity value of 0.39 Watercourse Units (WU).

Based on the current Proposed Site Plan: **3119-006-01_(A)_Layout_Proposals_A2 version 2** it is anticipated that the Proposed Development will result no net change of watercourse units (0.00%).

The current Site layout is not expected to impact >5m of linear habitats and therefore isn't subject to the 10% Biodiversity Net Gain condition.

This report details the methodology and results of the baseline biodiversity assessment and calculates the expected biodiversity value of the Site, post-development.



1. Introduction

1.1 Background

- 1.1.1 Envance was commissioned by KHC Management Services Limited in May 2026 to undertake a biodiversity net gain assessment of a parcel of land located to the east of Link Park Road, West Drayton, UB7 7HA (National Grid Reference (NGR): TQ 05186 79286 hereafter referred to as the 'Site'). This report is to support a planning application for the proposal for a waste management facility comprising the treatment and recycling of metals, End of Life Vehicles (ELVs), new surfacing and drainage, a site office, and a weighbridge (hereafter referred to as the Proposed Development).
- 1.1.2 Please note that the indicative gain plan provided within this report represents a draft at this stage as layout plans are subject to change.
- 1.1.1 The Site boundary is shown in [Figures 1-2](#).

1.2 Site Context

- 1.2.1 The Site is located on Link Park Road, West Drayton, and covers an area of approximately 0.20 ha. It is immediately surrounded by industrial development. To the south, the Site is separated from Thornley Country Park by Thornley Mill Road. Thornley Park Golf Club lies to the west, while Maybey's Meadow is located to the north and east. The watercourse assessed within this report is Bigley Ditch, which runs adjacent to the eastern Site boundary.

1.3 The Proposed Development

- 1.3.1 The current Proposed Development is for a waste management facility comprising the treatment and recycling of metals, End of Life Vehicles (ELVs), new surfacing and drainage, a site office, and a weighbridge as shown in the Proposed Site Plan: **3119-006-01_(A)_Layout_Proposals_A2 version 2**.
- 1.3.2 The Proposed Development is not expected to result in the loss or degradation of more than 25 m² of habitat. Although the Site lies within 10 metres of Bigley Ditch and is therefore included within the biodiversity metric assessment, no impacts to the watercourse are anticipated. Consequently, the development meets the criteria for the *de minimis* exemption under the statutory Biodiversity Net Gain (BNG) requirements and is not subject to the biodiversity gain condition (see [Appendix 1](#)).

1.4 Purpose of the Report

- 1.4.1 The Biodiversity Assessment considers the baseline survey information collected during the surveys undertaken by Envance in May 2026, to enable the completion of the Statutory Biodiversity Metric (SBM; Natural England 2024) to calculate the pre-development baseline value of the Site, and calculation of the habitat losses/gains as a result of the Proposed Development.
- 1.4.2 This Biodiversity Assessment is broadly based on the Chartered Institute of Ecology and Environmental Management (CIEEM) guidance (CIEEM, 2024) as follows:
- Present the baseline survey undertaken on the Site and to present the results of habitat condition assessment surveys following the Statutory biodiversity metric: User Guide.
 - Provide an overview of the proposed habitats following completion of the Proposed Development based on information supplied by the Applicant.
 - Present the results of the Defra Statutory Biodiversity Metric (SBM) assessment completed for the Proposed Development.



- Assess the likelihood of the Proposed Development achieving a net gain in biodiversity through the SBM and outline the associated management objectives for proposed habitats.

1.4.3 The purpose of this report is to utilise baseline field survey data to determine whether the Proposed Development is subject to Biodiversity Net Gain (BNG) requirements, and to inform the subsequent Statutory Biodiversity Metric (SBM) assessment where applicable.



2. Methodology

2.1 UKHab Survey

- 2.1.1 A habitat survey was undertaken by Envance ecologists Samantha Payne MSci on 7th May 2026. The survey followed UK Habitat Classification (UKHab) survey methodology (UKHAB Ltd, 2023) and assessed their condition using the Statutory Metric Condition Sheets¹. Weather conditions during the survey were good with good visibility.

2.2 River MoRPH Survey

- 2.2.1 As per the SBM methodology, the condition of all watercourse-based habitats (excluding ditches) is required to be assessed by the Modular River Survey (River MoRPh) methodology (Gurnell & Blackburn 2022). During the Site visit (5th June), a River MoRPH survey was undertaken on the section of Bigley Ditch identified within the Site in order to assess the condition of the watercourse. The survey was undertaken by River MoRPH certified ecologist Charles Brew and Natasha Rajpurohit. Due to the extent and width of the watercourse present, the river was divided into 5 sub-sections (modules) for the assessment. This allowed for a more accurate prediction of post-development watercourse condition.

2.3 Biodiversity Calculations

- 2.3.1 Biodiversity Values were calculated using the Statutory Biodiversity Net Gain Metric, 2024 (SBM). Habitat measurements were made using digital mapping software (QGIS Geographic Information System version 3.44). Habitat condition was assessed according to the criteria outlined by DEFRA (2024). The baseline survey and condition assessment were undertaken during the UKHab survey.
- 2.3.2 Post-Development habitats were determined from the Proposed Site Plan: **3119-006-01_(A)_Layout_Proposals_A2 version 2**, with proposed habitats mapped and digitised to generate areas for each of the habitats proposed.
- 2.3.3 These pre- and post-enhancement habitat areas were then entered into the SBM Calculation Tool. The SBM then provides a habitat distinctiveness score for each of the baseline and proposed habitats which are pre-assigned scores based on the habitat type.

2.4 Policy and Legislation

- 2.4.1 The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021 and was amended by the Levelling Up and Regeneration Act 2023. The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 made consequential amendments to other parts of the 1990 Act.
- 2.4.2 The biodiversity net gain regulations most directly relevant to planning are:
- The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 which commence biodiversity net gain for most types of new planning applications and provides transitional arrangements for section 73 permissions.

¹ <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides> (statutory Metric Condition Sheets)



- The Biodiversity Gain Requirements (Exemptions) Regulations 2024 which prescribe exemptions for categories of development to which biodiversity net gain does not apply.
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 which amend the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013 to include provisions in respect of applications for planning permission and the submission and determination of Biodiversity Gain Plans, as well as modifications of Schedule 7A of the Town and Country Planning Act 1990 for phased development.
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 which sets out the modifications for irreplaceable habitat.

2.4.3 Article 37A of The Town and Country Planning (Development Management Procedure) (England) Order 2015 describes the Biodiversity Gain Hierarchy, which is a structured approach designed to maximise biodiversity gains. Broadly, this identifies the following steps to be considered in order when a habitat may be impacted by a development;

- Retention - the avoidance of adverse impacts,
- Enhancement - onsite habitat enhancement,
- Creation - onsite habitat creation,
- Offsite mitigation - gains from an offsite location,
- Biodiversity credits - the purchase of biodiversity credits as a last resort.

2.4.4 [Appendix 1](#) provides further details of policy and legislation.

2.5 Limitations

- 2.5.1 This report serves to indicate the value of the Site in nature conservation terms based upon the survey data gathered. As with any survey of this kind, the information collected defines the habitat types present and their condition and is not intended to be a record of every species present.
- 2.5.2 Numbers within the SBM, especially habitat areas, are subject to two decimal place rounding. Therefore, there may be small apparent margins of error, when in fact, these are correct within the SBM and are due to rounding.
- 2.5.3 Most of the ecological data remains valid for only short periods due to the inherently transient nature of the subject. The survey results contained in this report are considered accurate for one to two years, assuming no significant or considerable changes to the Site conditions.
- 2.5.4 This report assumes that construction will commence within 1-2 years of the date of the assessment in accordance with the British Standard 42020:2013 unless otherwise stated.
- 2.5.5 Habitat maps present in the figures have been reproduced from detailed field notes and informed by aerial imagery (Google Earth 2026), OS mapping and site maps provided by the client. The accuracy of these figures is therefore ultimately guided by the accuracy of these sources and can only be relied upon to a certain degree of Biodiversity Assessment.



3. Biodiversity Assessment

3.1 Site Habitats

- 3.1.1 Site habitats are described in **Table 1** using UK Habitat Classification terminology and mapped in **Figure 1** (See **Appendix 3** for photograph references). The baseline assessment is based on the habitats present on Site on 7th May 2026.
- 3.1.2 An Arboricultural Impact Assessment² was undertaken to determine whether any trees adjacent to the Site would be affected by the Proposed Development. The assessment concluded that no trees would be impacted as a result of the development.

Table 1 - Description of Site habitats³

Habitat	Description
A1 Developed land; sealed surface – u1b	Two areas of developed land; sealed surface u1b (area = 0.25 Ha) are present within the Site. This habitat comprises sealed hardstanding associated with the existing industrial setting. Condition assessment N/A. This habitat is common and widespread, is not Priority Habitat, and is considered to be of Less than Local importance for nature conservation.
A3-A6 Artificial unvegetated, unsealed surface – u1c	Four areas of artificial unvegetated, unsealed surface u1c (Area = 0.09) are present within the Site. This habitat comprises gravel / semi-permeable surfacing with sparse ruderal vegetation and occasional offshoots from adjacent woodland / tree species. Species recorded include herb-robert (<i>Geranium robertianum</i>), bramble (<i>Rubus fruticosus</i> agg.), willowherb (<i>Epilobium</i> sp.), cleavers (<i>Galium aparine</i>), common ragwort (<i>Jacobaea vulgaris</i>), dandelion (<i>Taraxacum</i> agg.), spear thistle (<i>Cirsium vulgare</i>), forget-me-not (<i>Myosotis</i> sp.), crack willow (<i>Salix fragilis</i>) offshoots / saplings and buddleia (<i>Buddleja davidii</i>). Condition assessment N/A. This habitat is common and widespread, is not Priority Habitat, and is considered to be of Less than Local importance for nature conservation.
Other rivers and streams – r2b	Bigley Ditch is a small watercourse running along the eastern boundary of the site. The surrounding land is predominantly hardstanding, with sections of scrub, and ruderal vegetation present intermittently along the bank edge. Scattered trees are also present adjacent to the watercourse corridor in places. The watercourse is heavily managed up to the edge of the bank, with hardstanding on either side of the watercourse. The channel is clearly modified with a relatively straight channel and steep banks. The banks were predominantly characterised by exposed and eroded bare ground, with ruderal tall herbs comprising species. Scattered scrub and trees

² 26_5837_06_17_-_Arboricultural_Impact_Assessment___Method_Statement_V.1_-_Land_off_Link_Park_Road

³ The UKHab Classification habitat type is shown, followed by the corresponding Statutory Biodiversity Metric habitat type (which is used for calculation of the biodiversity baseline and biodiversity net-gain).



Habitat	Description
	were present along sections of the riverbank. From a review of aerial imagery and the results of the field survey, the river type has been assessed as river type H – A straight/sinuuous unconfined, watercourse with sand as the most frequent sediment type, and gravel/ pebble as the coarsest material recorded.

3.2 On-Site Baseline

- 3.2.1 **Figure 1.** shows a map of identified habitats present on the Site. **Table 2** details the watercourse-based habitats identified within the Site, their indicative condition, strategic significance, and calculated biodiversity value. The baseline river condition assessment results are provided in **Appendix 2**. Reference should also be made to the accompanying statutory biodiversity metric Excel spreadsheet **Appendix 4**.
- 3.2.2 The on-site baseline biodiversity of the Site was estimated at 0.39 Watercourse Units (WU). The watercourse condition was initially assessed as moderate; however, due to the channel being identified as ‘overdeep’ (referring to modification of the channel, see River MoRPh methodology (Gurnell & Blackburn 2022)), the condition score was subsequently downgraded to “fairly poor”.

Table 2 - Baseline Watercourse Habitats⁴, Condition and Unit Scores

Habitat Identified	Habitat Distinctiveness	Habitat Condition	Watercourse encroachment	Riparian encroachment	Approx. Length (km)	Estimated Biodiversity Value (WU)*
Other rivers and streams	High	Fairly Poor	Minor	Major/ Major	0.062	0.39
Total					0.062	0.39

* Numbers within the SBM are subject to two decimal place rounding.

3.3 Strategic Significance

- 3.3.1 The strategic significance of a site will be determined by areas included within the Local Nature Recovery Strategy (LNRS) produced for a region. A LNRS has been produced for London⁵. Areas mapped as Nature Recovery Opportunity Areas or Areas of Particular Importance for Biodiversity within the Nature Network are classed as strategically significant for BNG.
- 3.3.2 The Bigley Ditch is identified within the Nature Network and has therefore been assigned high strategic significance. Whilst the wider Site falls within an LNRS Area of Concentrated Biodiversity (ACB), no area-based habitats of sufficient ecological importance were recorded on-site that would qualify for a high strategic significance score. As such, the high strategic significance rating applies only to the watercourse.

3.4 Post-Development

- 3.4.1 **Figure 2** show the post-development habitats, based on the Proposed Site Plan: **3119-006-**

⁴ Habitat types are presented in their Statutory Biodiversity Metric format.

⁵ Available at: <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/parks-green-spaces-and-biodiversity/local-nature-recovery-strategy>



01_(A)_Layout_Proposals_A2 version 2.

- 3.4.2 It is expected that the works will not impact the adjacent watercourse, resulting in no loss of biodiversity units.

Retention

- 3.4.3 The watercourse adjacent to the Site is not expected to be affected by the Proposed Development. As such, it will retain its existing condition and encroachment values, with no adverse impacts anticipated.



4. Biodiversity Exemption Statement

- 4.1.1 Referring to the criteria set out in [Appendix 1](#), development qualifies for the *de minimis* exemption where it does not impact a priority habitat and affects less than 25 m² of onsite habitat or less than 5 m of linear habitat. The Site contains no priority habitats and no baseline area habitat value, comprising entirely of (hardstanding/bare ground).
- 4.1.2 Although the watercourse has a baseline biodiversity value and lies within 10 m of the Site boundary, it will not be impacted by the Proposed Development. As a result, there will be no loss or degradation of area-based or linear habitats, and the development falls below the statutory thresholds for mandatory Biodiversity Net Gain. Consequently, the scheme is exempt from the requirement to deliver a 10% biodiversity net gain.

5. Conclusion

- 5.1.1 This report provides a comprehensive assessment of baseline and post-development biodiversity values for the Proposed Development and confirms that the Site is exempt from BNG requirements.
- 5.1.2 The baseline surveys identified a total biodiversity value of 0.39 WU, comprising “other rivers and streams”, a high distinctiveness habitat type. The watercourse lies within a Local Nature Recovery Strategy (LNRS) opportunity area and has therefore been assigned a high strategic significance rating. The Proposed Development results in the loss of all land-based habitats; however, no area-based baseline habitats with measurable biodiversity value were recorded within the Site. As such, there is no direct loss of area-based habitat as a result of the Proposed Development. The Site does, however, fall within the 10 m riparian buffer of a watercourse and must therefore be included within the assessment metric. No direct impacts to the watercourse are anticipated as a result of the Proposed Development, with the post-development scenario therefore retaining a value of 0.39 WU. This equates to no net change (0.00%) in watercourse-based habitat units. On this basis, the Proposed Development falls within the *de minimis* threshold and is exempt from BNG requirements.



6. References

CIEEM (2021). Biodiversity Net Gain Report and Audit Templates Chartered Institute of Ecology and Environmental Management, Winchester, UK

CIEEM. "Biodiversity Net Gain – Principles and Guidance for UK Construction and Developments." Biodiversity Net Gain: Approaches, Chartered Institute of Ecology and Environmental Management. Accessed 2024. <https://cieem.net/i-am/biodiversity-enhancement-approaches/biodiversity-net-gain/>

DEFRA (2024) *Statutory Biodiversity Metric*. Available at <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

Google. (2025). Google Earth Pro (Version 7.3.6) [Software]. Google. <https://earth.google.com>.

Gurnell, A. M., & Blackburn, J. H. (2022). *The MoRPh Survey: Technical Reference Manual* (2022 ed.). Modular River Survey. Retrieved from <https://modularriversurvey.org/>

UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)



7. Figures

Figure 1. On-site Baseline Habitat Map.

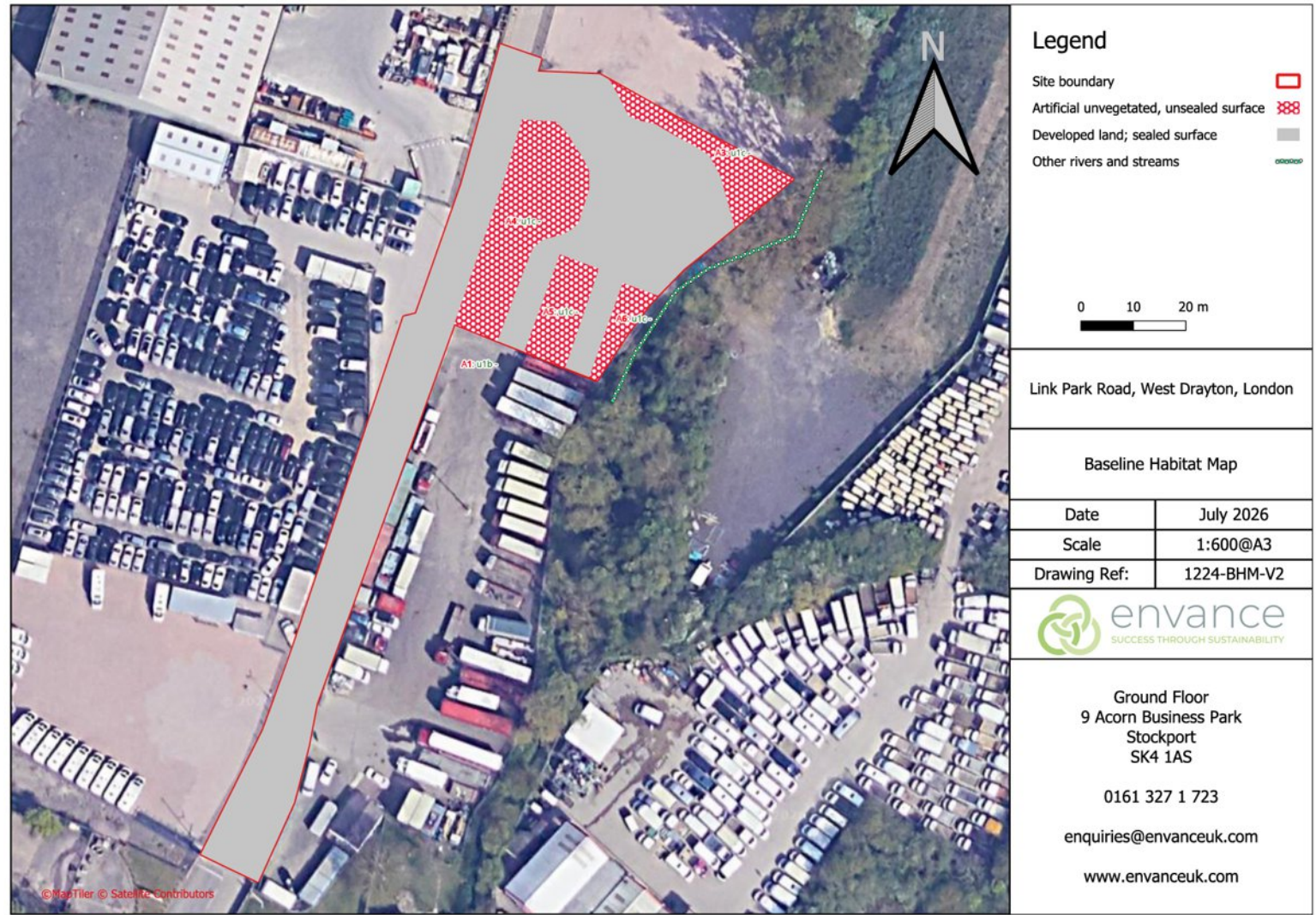




Figure 2. On-site Post-development Habitat Map





Appendix 1 Summary of Legislation

Town and Country Planning Act 1990 – Biodiversity Net Gain

Under Schedule 7A of the Town and Country Planning Act 1990 (inserted by Schedule 14 of the Environment Act 2021), grants of planning permission are to be subject to a condition to secure that the biodiversity net gain objective is met. Specifically;

- 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.
- The biodiversity value attributable to the development is the total of—
 - the post-development biodiversity value of the onsite habitat,
 - the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and
 - the biodiversity value of any biodiversity credits purchased for the development.
- The relevant percentage is 10%.
- The Secretary of State may by regulations amend this paragraph so as to change the relevant percentage.

The Schedule goes on to emphasise the use of the most recent version of the Statutory Biodiversity Metric, detail from when the baseline biodiversity of a relevant Site should be calculated, how post-development biodiversity values should be calculated, and how off-site biodiversity gains should be registered and calculated.

Exemptions

Certain types of developments are exempt from the mandatory biodiversity net gain condition –

- Existing planning applications - If a planning application for a development was made before day one of mandatory BNG on 12 February 2024, the development is exempt from BNG. This also applies to retrospective planning permissions made under section 73A and section 73 permissions where the original permission which the section 73 relates to was either granted before 12 February 2024 or the application for the original permission was made before 12 February 2024,
- Householder development - Development which is subject of a householder application as defined within Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015,
- Development subject to the de minimis exemption - Development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m by 5m) of onsite habitat, or 5 metres of linear habitats such as hedgerows, and watercourses.
- Self-build and custom build development - Developments which:
 - consists of no more than 9 dwellings, and
 - is carried out on a site which has an area no larger than 0.5 hectares, and
 - consists exclusively of dwellings which are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015.
- Urgent Crown development granted permission under section 293A of the Town and Country Planning Act 1990,
- Developments that are granted planning permission by a development order (including permitted



development rights),

- Development of a biodiversity gain site - Development which is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the biodiversity gain condition which applies in relation to another development,
- Development related to the high speed railway transport network - Development forming part of, or ancillary to, the high speed railway transport network comprising connections between all or any of the places or parts of the transport network specified in section 1(2) of the High Speed Rail (Preparation) Act 2013.

The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024

This legislation includes a schedule in the form of two tables which list 'irreplaceable habitats'. These habitats are considered too rare or difficult to reproduce to be subject to standard biodiversity net gain principles, and must therefore be mitigated for with bespoke compensation if impacted at all. The list of habitats is as follows;

- Blanket bog
- Lowland fens
- Limestone pavements
- Coastal sand dunes
- Ancient woodland
- Ancient trees and veteran trees
- Spartina saltmarsh swards
- Mediterranean saltmarsh scrub

The Town and Country Planning (Development Management Procedure) (England) Order 2015

Section 73A describes the biodiversity gain hierarchy, which is copied below in its entirety.

In this Part, "biodiversity gain hierarchy" means the following actions in the following order of priority—

- a) in relation to onsite habitat with a habitat distinctiveness score, applied in the biodiversity metric, equal to or higher than four—*
 - i. avoiding adverse effects of the development, or*
 - ii. insofar as those adverse effects cannot be avoided, mitigating those effects;*
- b) in relation to any onsite habitat which is adversely affected by the development, compensating for that adverse effect by—*
 - i. habitat enhancement of onsite habitat;*
 - ii. insofar as there cannot be that enhancement, creation of onsite habitat;*
 - iii. insofar as there cannot be that creation, the availability of registered offsite biodiversity gain for allocation to the development;*
 - iv. insofar as registered offsite biodiversity gain cannot be allocated to the development, the purchase of biodiversity credits*

Policy

National Planning Policy Framework

The National Planning Policy Framework (NPPF, 2024) sets out the Government's planning policies for England and how these are expected to be applied. Section 15 of the NPPF deals with conserving and enhancing the natural environment. Habitats and biodiversity are specifically referenced in paragraphs 187 to 195, as copied



below.

187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- c) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- d) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- e) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- f) 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;
- g) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- h) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁷ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- 7.1.1 the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- 7.1.2 the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - a) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

191. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special



character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

192. 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.

193. When determining planning applications, local planning authorities should apply the following principles:

- a) 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;
- b) 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;
- c) 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 reasons⁷⁰ and a suitable compensation strategy exists; and
- d) 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 to nature where this is appropriate.

194. The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

195. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.



Appendix 2. Baseline River Condition Assessment Results

Table A1.1 – Baseline River Condition Assessment Results

Details		North Site
Survey Details	River	Bigley Ditch
	Reach	Bigley Ditch, Link Park
	Sub-reach	Bigley Ditch, Link Park, 1
	Module Numbers	1-5
	Project Number	1224
	Surveyor	Charles Brew, Natasha Rajpurohit
	MoRPh5 Date/Time	5 th June, 15:00
River Condition	Final Condition Class	Moderate
	Preliminary Condition Score	0.66
	Average of Positive Indices	1.737
	Average of Negative Indices	-1.077
Dimensions	River Shape	5.727
	Average Width m	12.6
Group A	Final River Type	H - Straight/sinuuous, coarsest GP, average SA
	River Category	Other river
	A1: Braiding Index	1
	A2: Sinuosity Index	1.106
	A3: Anabranching Index	1
	A4: Level of Confinement	Unconfined
	A5: Reach Valley Gradient m/m	0.00072
	A6: Bedrock Reaches	No
	A7: Coarsest Bed Material Size Class	Gravel-Pebble
	A8: Average Alluvial Bed Material Size Class	Sand
Group B	B1: Bank Top Vegetation Structure	1
	B2: Bank Top Tree Feature Richness	3
	B3: Bank Top Water-Related Features	0
	B4: Bank Top NNIPS Cover	0
	B5: Bank Top Managed Ground Cover	-4
Group C	C1: Bank Face Riparian Vegetation Structure	1
	C2: Bank Face Tree Feature Richness	1
	C3: Bank Face Natural Bank Profile Extent	3
	C4: Bank Face Natural Bank Profile Richness	3
	C5: Bank Face Natural Bank Material Richness	1
	C6: Bank Face Bare Sediment Extent	0



Details		North Site
	C7: Bank Face Artificial Bank Profile Extent	0
	C8: Bank Face Reinforcement Extent	-2
	C9: Bank Face Reinforcement Material Severity	-1
	C10: Bank Face NNIPS Cover	-3
Group D	D1: Channel Margin Aquatic Vegetation Extent	4
	D2: Channel Margin Aquatic Morphotype Richness	3
	D3: Channel Margin Physical Feature Extent	1
	D4: Channel Margin Physical Feature Richness	1
	D5: Channel Margin Artificial Features	-1
Group E	E1: Channel Aquatic Morphotype Richness	2
	E2: Channel Bed Tree Features Richness	2
	E3: Channel Bed Hydraulic Features Richness	2
	E4: Channel Bed Natural Features Extent	2
	E5: Channel Bed Natural Features Richness	1
	E6: Channel Bed Material Richness	2
	E7: Channel Bed Siltation	0
	E8: Channel Bed Reinforcement Extent	0
	E9: Channel Bed Reinforcement Severity	0
	E10: Channel Bed Artificial Features Severity	-3
	E11: Channel Bed NNIPS Extent	0
	E12: Channel Bed Filamentous Algae Extent	0
Overdeep		Yes
Final Condition		Fairly Poor



Appendix 3. Photographs



Photograph 1. Developed land; sealed surface



Photograph 2. Artificial unvegetated, unsealed surface.



Photograph 3. Other rivers and streams



Appendix 4. Statutory Biodiversity Metric Calculation Tool

See separate Excel spreadsheet