



164 Harefield Road, Uxbridge UB8 1PP

Biodiversity Net Gain Report

Sept 2025

Biodiversity Net Gain

Revision Schedule

 Biodiversity Net Gain Report
 September 2025

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Aug 2025	Draft	P Giesberg	S. Bamford	P Giesberg
2	Sept 2025	Final	P Giesberg	S Bamford	P Giesberg

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Executive Summary

A Biodiversity Net Gain (BNG) assessment has been undertaken for the proposed residential development at **164A Harefield Road, Uxbridge UB8 1PP**. The site is currently occupied by a dwelling, ancillary garden structures, and areas of private garden comprising lawn, flower beds, two trees, and a Leylandii hedge.

Development Context

- The scheme has evolved from a previously approved single detached dwelling to a revised proposal for a **pair of semi-detached houses**.
- The larger footprint and associated works necessitate a new BNG assessment under the **Environment Act 2021**, which requires all small-scale developments from April 2024 onwards to deliver a minimum **10% biodiversity net gain**.
- The **Small Sites Metric (SSM)** tool was applied, as the site qualifies as a small residential development under planning regulations.

Baseline Assessment

- **On-site habitats:** 0.2916 habitat units and 0.02 hedgerow units were recorded.
- **Statutory designations nearby:** Fray's Farm Meadows SSSI (444m north) and the River Fray (115m west, London BAP habitat). Both are sufficiently distant to avoid direct impacts from the development.
- Access limitations in 2025 restricted survey updates; however, the 2024 survey data remains reliable, with no notable ecological changes observed.

Impact of Proposed Development

- The scheme will result in the **loss of approximately 305 m² of vegetated garden habitat**.
- Two trees will be retained. The Leylandii hedge will be replaced with a **longer, native-species hedge**, but improvements within private gardens cannot count toward BNG credits.
- Net impact: a **loss of 0.061 habitat units**. Including the statutory 10% uplift requirement, **0.0902 habitat units** and **0.022 hedgerow units** must be provided to achieve compliance.

Mitigation and Compensation Strategy

- On-site options such as a green roof were considered but ruled out due to prioritisation of photovoltaic panels.
- Consequently, compliance will be achieved by **purchasing biodiversity units from an accredited off-site habitat provider**:
 - 0.0902 habitat units
 - 0.022 hedgerow units
- A re-evaluation will be undertaken closer to construction to explore whether **local BNG delivery schemes** become available.

Conclusion

The proposed development cannot meet its BNG requirement entirely within the site due to regulatory exclusions on private garden habitats. The shortfall will therefore be addressed through the **purchase of off-site biodiversity units**, ensuring full compliance with the Environment Act 2021.

1 Introduction

It is proposed to erect a pair of semi-detached three-bedroom houses to the rear of 164 Harefield Road, Uxbridge UB8 1PP. Since 2 April 2024 minor development proposals are required to comply with the legislation around Biodiversity Net Gain (BNG). The BNG legislation requires that development projects lead to an improvement in measurable biodiversity. The improvements can be either on-site or where this is not feasible, off-site. Eligible small sites can use a simplified assessment tool, the Small Site Metric calculation tool (SSM) to assess and report on the impact of the proposed development. This document summarises the findings and provides more detail about the assessment and the chosen mitigation and compensation measures.

A planning application for a single detached house has been approved in March 2025. Subsequently a further evaluation of the proposed development has taken place and a new application is being submitted. The new application is for a pair of semi-detached house instead of the single detached house. The footprint of this building is larger than the previous proposal and therefore a new assessment of how the Biodiversity Net Gain requirements will be implemented is required.

The proposed development is situated in a sub-urban residential neighbourhood in Uxbridge. (Fig. 1).

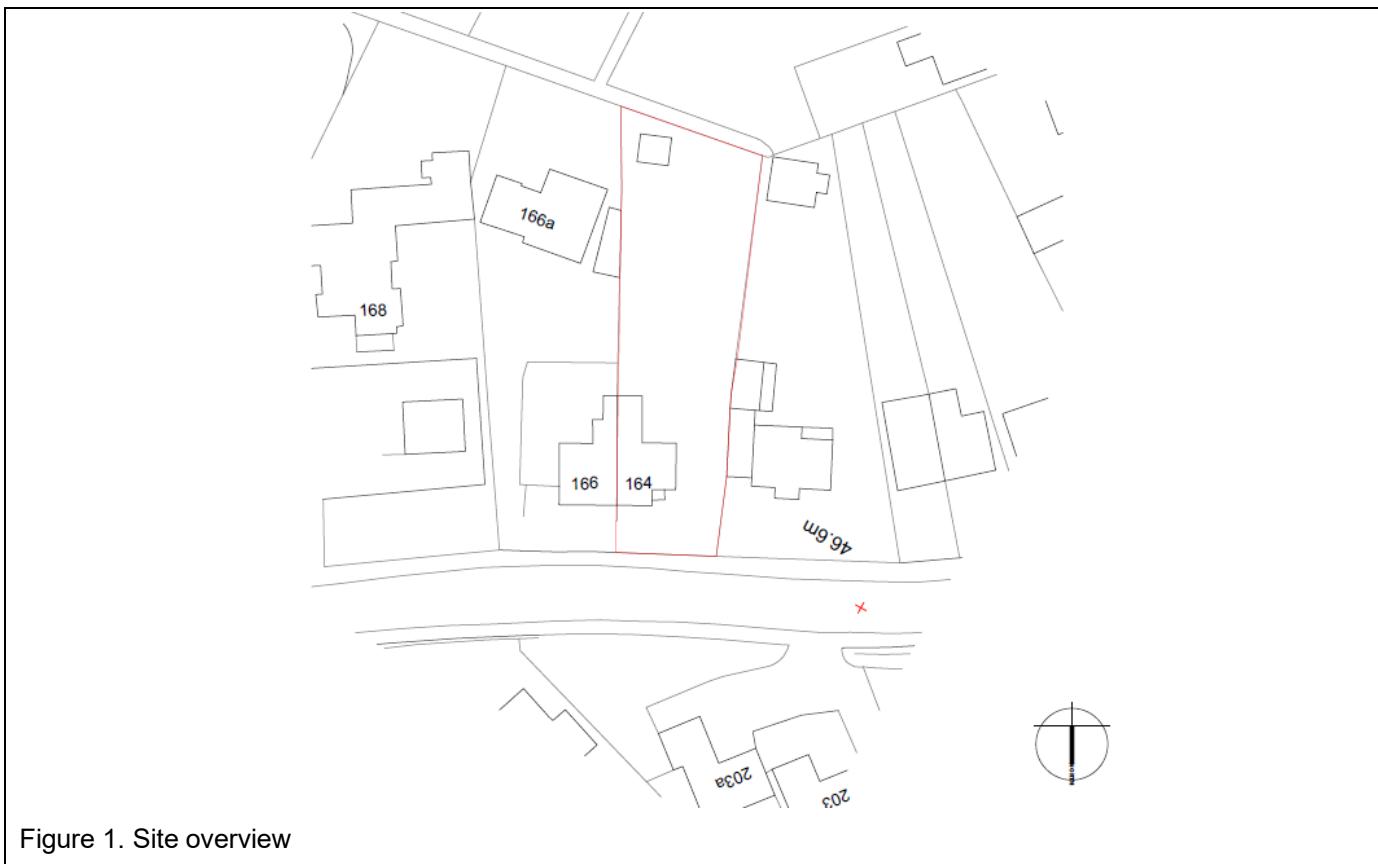


Figure 1. Site overview

The proposed development will take place entirely within the current property boundaries of 164 Harefield Road, which comprises a dwelling and ancillary access structures as well as a garden with a number of garden buildings such as sheds and greenhouse. Details are provided in appendix 1.

2 Methodology and assessment criteria

2.1 Legislation

Environment Act 2021

Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites will have to deliver at least 10% biodiversity net gain from 12 February 2024. BNG will be required for small sites from 2 April 2024. BNG will be measured using Defra's biodiversity metric and all off-site and significant on-site habitats will need to be secured for at least 30 years. This sits alongside:

- a strengthened legal duty for public bodies to conserve and enhance biodiversity,
- new biodiversity reporting requirements for local authorities, and
- mandatory spatial strategies for nature: Local Nature Recovery Strategies or 'LNRS'.

To calculate the number of biodiversity units for existing habitat, or habitat enhancements to achieve BNG, the calculator called the statutory biodiversity metric tool must be used. For eligible small sites, a simplified metric, the Small Site Metric calculation tool can be used.

This tool applies the statutory biodiversity metric formula.

2.2 Small Sites Metric Calculation Tool

The SSM can only be used for small sites which are defined as not major developments under the Town and Country Planning (Development Management Procedure) (England) Order 2015). This means:

- residential development where the number of dwellings is between 1 and 9 on a site of an area 1 hectare or less, or if the number of dwellings is unknown, the site area is less than 0.5 hectares, or
- commercial development where floor space created is less than 1,000 square metres or total site area is less than 1 hectare, or
- development that is not the winning and working of minerals or the use of land for mineral-working deposits, or
- development that is not waste development

The Small Sites Metric (SSM) is a simplified biodiversity metric developed by Natural England for calculating biodiversity net gain on smaller development sites. A key characteristic of the SSM is that it relies heavily on a habitat classification system based primarily on habitat type or use, rather than requiring detailed ecological survey data.

Habitat Classification in the Small Sites Metric

- The SSM includes a limited set of common habitat types found in urban and suburban settings, focusing on easily identifiable categories such as amenity grassland, modified grassland, arable land, scrub, woodland types, hedgerows, and watercourses.
- Each habitat type in the SSM is assigned a distinctiveness score, representing its relative biodiversity value. Habitats are classified into broad bands such as very low, low, and medium distinctiveness.
- The metric assesses existing habitats on the site for their type and condition based on standardized criteria embedded within the tool, allowing users without specialist ecological expertise to apply it.
- Importantly, the SSM excludes priority habitats and those of very high distinctiveness, as such sites must be assessed using the full statutory biodiversity metric, which requires more detailed data.

In certain circumstances the standard Statutory Biodiversity Metric Calculation tool should be used, even for sites that fall within the above definition of small site. These circumstances are:

- where habitats that are not available in the SSM are present on-site
 - any site containing any additional habitats (including riparian zones where relevant) not included in the SSM must use the statutory biodiversity metric calculation tool
- where priority habitats are present on-site
 - some hedgerows and arable field margins are excluded from the above as these are medium distinctiveness habitats and are included in the SSM
- where statutory protected sites or habitats are present
- where European protected species are present

If statutory protected sites or priority habitats are located within 500m of the development site boundary, consideration should be given whether an ecologist and the use the statutory biodiversity metric calculation tool are required. If it is chosen to continue to use the SSM, a section of the calculation tool must be filled in to reflect this and a warning flag will appear where this is the case.

2.3 The potential for improvements of private gardens

Under the Biodiversity Net Gain (BNG) regulations, habitat improvements within private gardens cannot be included in BNG calculations. This is because private gardens are excluded from generating credited biodiversity gains, as enhancements there cannot be legally secured or managed for the minimum 30-year period required by the regulations. Consequently, new dwellings built within the curtilage of an existing house and garden cannot rely on onsite private garden habitat enhancements to meet their BNG obligations and must seek alternative solutions.

While it is theoretically possible for a developer to achieve biodiversity net gain through offsite habitat creation or enhancement located in the vicinity of the development site—referred to as developer-led offsite enhancements—this approach involves additional complexities. The developer must identify suitable land under their ownership or

control outside the development site, carry out the necessary habitat creation or restoration, and enter into legal agreements to secure the biodiversity gains for at least 30 years. The developer will also be responsible for long-term management and monitoring of these offsite habitats to ensure the net gain target is delivered.

Therefore, most small developers comply with BNG requirements by purchasing biodiversity units or credits from recognized biodiversity gain sites. These units represent habitat enhancement already secured and managed by specialist providers and are accepted under BNG legislation.

It is important to note that BNG solutions are continually evolving. Some local planning authorities and stakeholders are actively exploring the potential to support more localized and collaborative offsite biodiversity enhancement initiatives. These efforts aim to develop frameworks that might enable small developers to contribute to or participate in nearby habitat projects more feasibly. However, such localized support mechanisms are still emerging and vary by authority.

In summary, given the regulatory exclusion of private garden habitats and the practical challenges of developer-led offsite habitat creation for small developments, achieving BNG compliance for dwellings within existing gardens will predominantly require offsite solutions through the purchase of biodiversity units, while the sector continues to develop more localized and flexible approaches.

3 Results and conclusion

3.1 Baseline

The desktop study shows that there is statutory site present within 500 m: the Fray's Farm Meadows SSSI is located 444 m to the north of the proposed development site. It is across the A42.

The Fray river itself (which is a BAP habitat in the London BAP) passes to the west of the site at a distance of 115 meters.

The nature and size of the development site, compared with the distance of the SSSI and the river Fray mean that it is unlikely that the proposed development will have an effect on the statutory site or the BAP habitat. We therefore continue to apply the SSM for the proposed development.

The site in its current condition comprises a dwelling with paving for access to parking space and garden structures, such as sheds and green house. The vegetated areas are a typical garden lawn and flower beds, although currently not well maintained. Along the boundary with 166A Harefield Road a Leylandii hedge is present. Two trees are present on the site. The plan in Appendix 2 gives an overview of the current habitats present on the site.

The current occupant of the house and garden did not allow the assessor access to the property this year. The previous occupant had given permission in the summer of 2024. This year the site could only be verified from a neighbouring garden and no noticeable changes were observed from the situation in 2024.

A site visit is required for the formal BNG submission. The combination of the fact that the entire site is within the curtilage of a private house and garden, falls within the remit of the Small Sites Metric and a BNG visit the previous year was carried out, a reliable understanding of the BNG habitat value can still be made.

If considered necessary a formal site visit can again be carried out at a later date, when the current tenancy has come to an end.

A total of 0.2916 habitat units and 0.02 hedgerow units are present on site, requiring an increase of 0.029 and 0.002 to meet the 10% increase target.

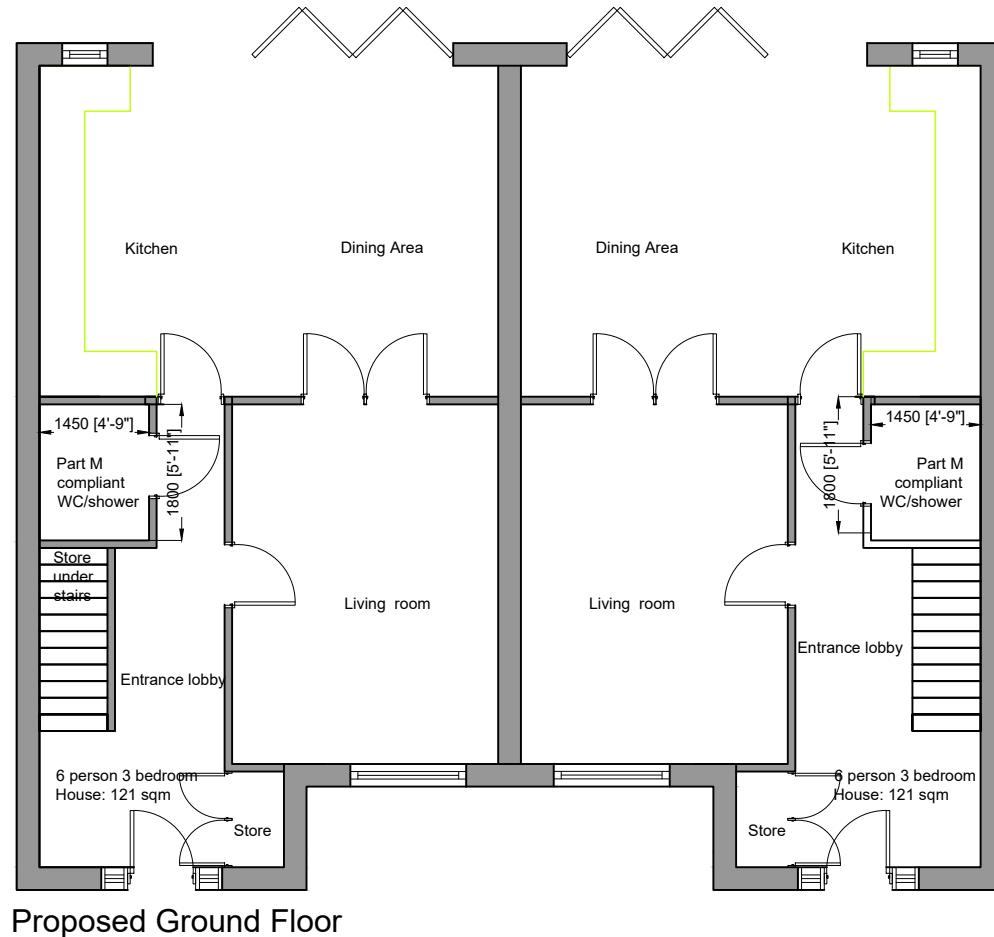
3.2 Proposed development

The construction of the new houses and the associated access and parking space as well as the pavement in the gardens will lead to a reduction in the area that is currently made up of vegetated garden. On balance the area loss is 305 m² of habitat with the broad type of Urban and the specific type of vegetated garden. Both trees will be retained and the Leylandii hedgerow will be removed, and a replacement hedgerow of increased length will be provided. Within the context of a garden, it is not feasible to provide the 1 m free area on either side of the hedge, which would be required for a hedge that could be classed as native hedgerow. As set out earlier, despite the enhance by replacing a Leylandii hedge with a longer hedge comprising native species, improvements cannot be taken into account in the BNG methodology for private gardens.

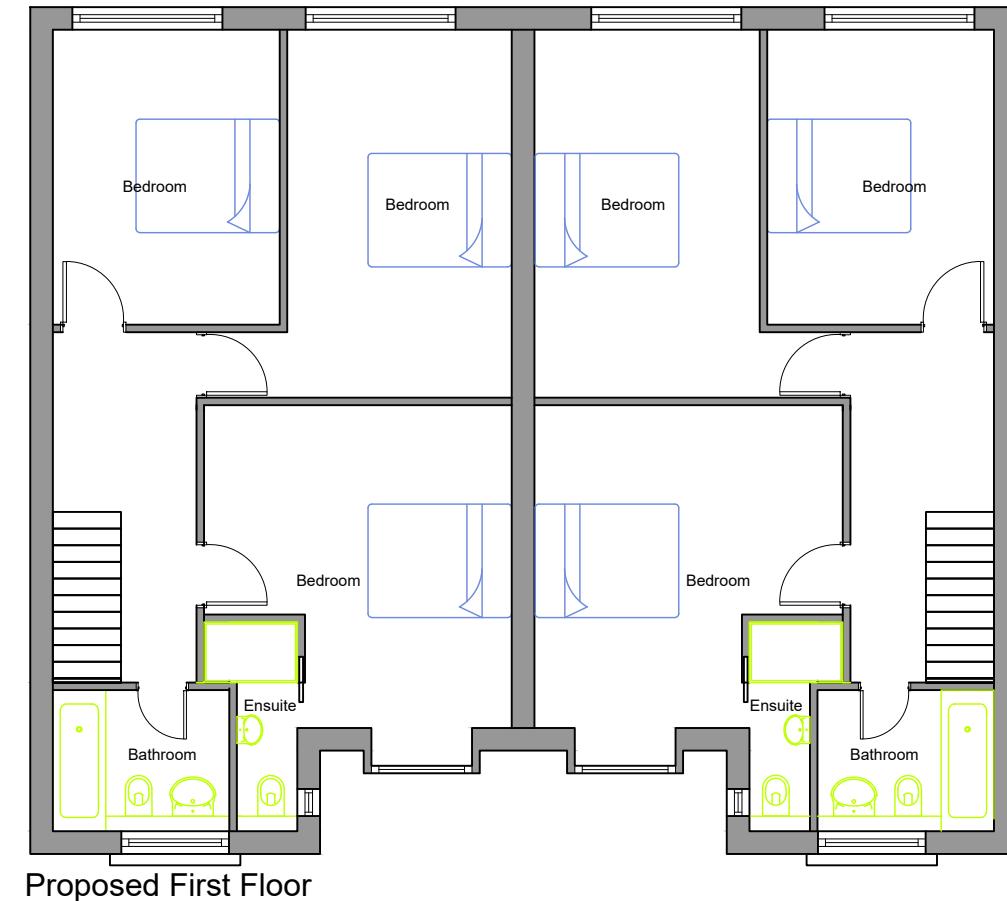
A total of 0.061 habitat units will be lost and with the required addition of 0.029 units the total habitat creation would be 0.0902 and 0.022 for hedges. The south facing roof space would be able to accommodate a green roof, to provide some of the habitat creation required. However, this space is reserved for a photovoltaic array. Other options are not feasible and therefore it is intended to purchase 0.0902 Biodiversity Units for offsite habitat creation and 0.022 for hedgerows.

There will be a time lag between this assessment and the start of the construction process. Nearer the time of start on site a re-evaluation will take place to examine if local schemes have been initiated that can be used to implement the BNG requirement for the site.

Appendix 1. Proposed Drawings



Proposed plans to be in accordance with M4(2) as set out in Approved Document M to the Building Regulations (2015 edition)



Client

Project

Rear of 164 Harefield Rd, UB8 1PP

Drawing title

Proposed Ground & First Floor

Revisions

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Planning

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FN May 2025

Checked by Date checked

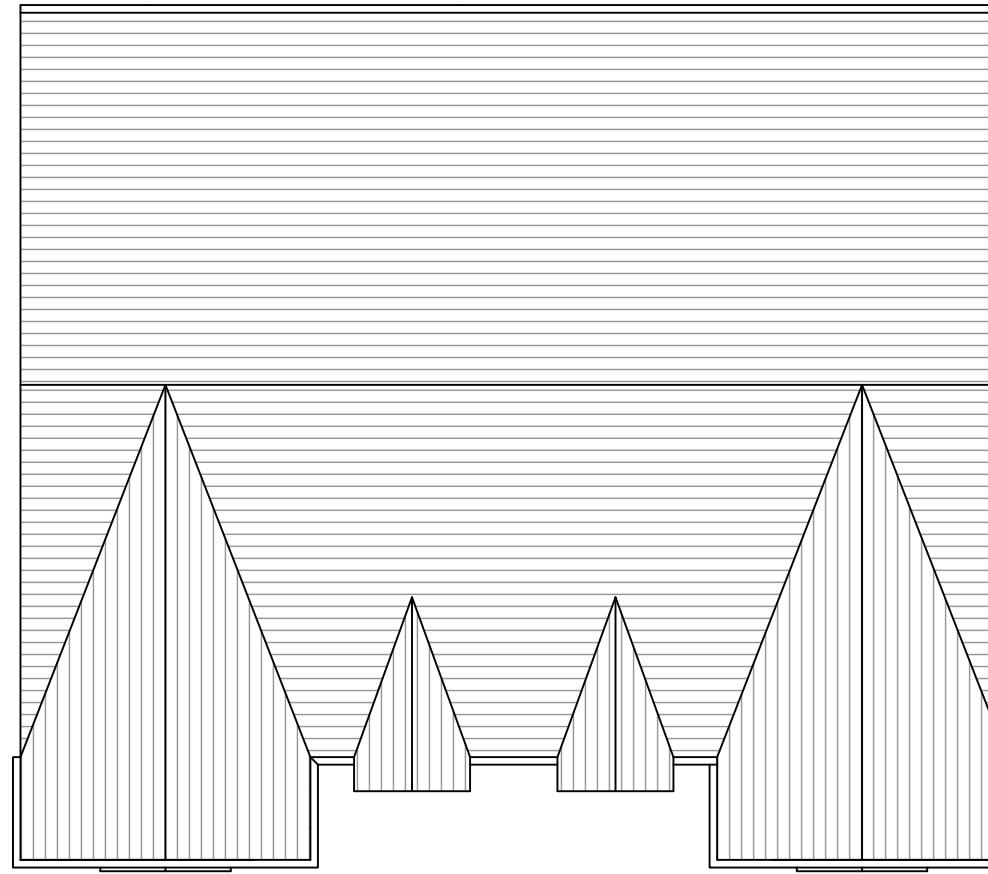
RP 14/5/25

Scale at A3 Project number

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Drawing number Revision

110



Proposed Roof Plan

Client

Project

Rear of 164 Harefield Rd, UB8 1PP

Drawing title

Proposed Roof Plan

Revisions

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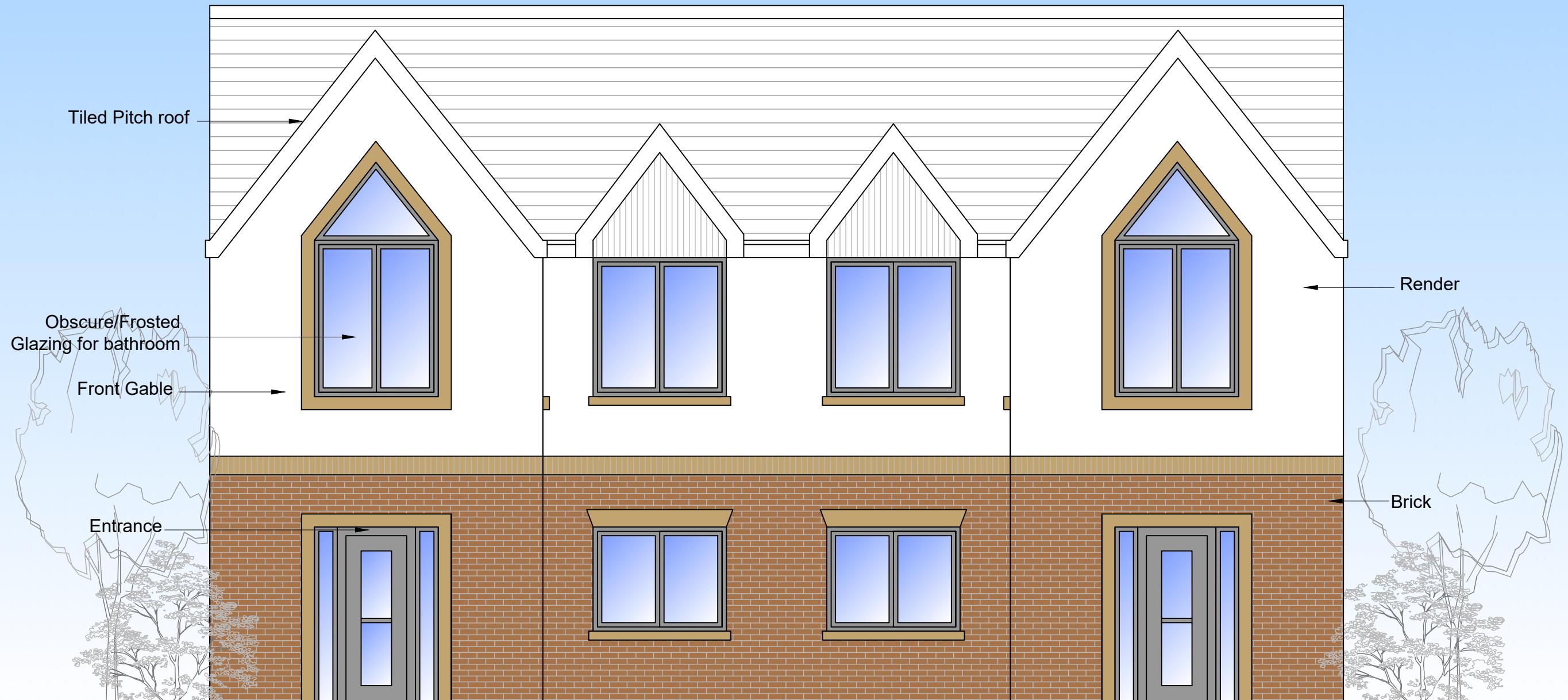
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Drawing number

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Revision



Proposed Front Elevation

Client

Revisions

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1:50 scale 0 1 2 3 4 5

Project

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Drawing title

Proposed front elevation

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Drawing number

200



Client

Revisions

Project

Rear of 164 Harefield Rd, UB8 1PP

Drawing title

Proposed rear elevation

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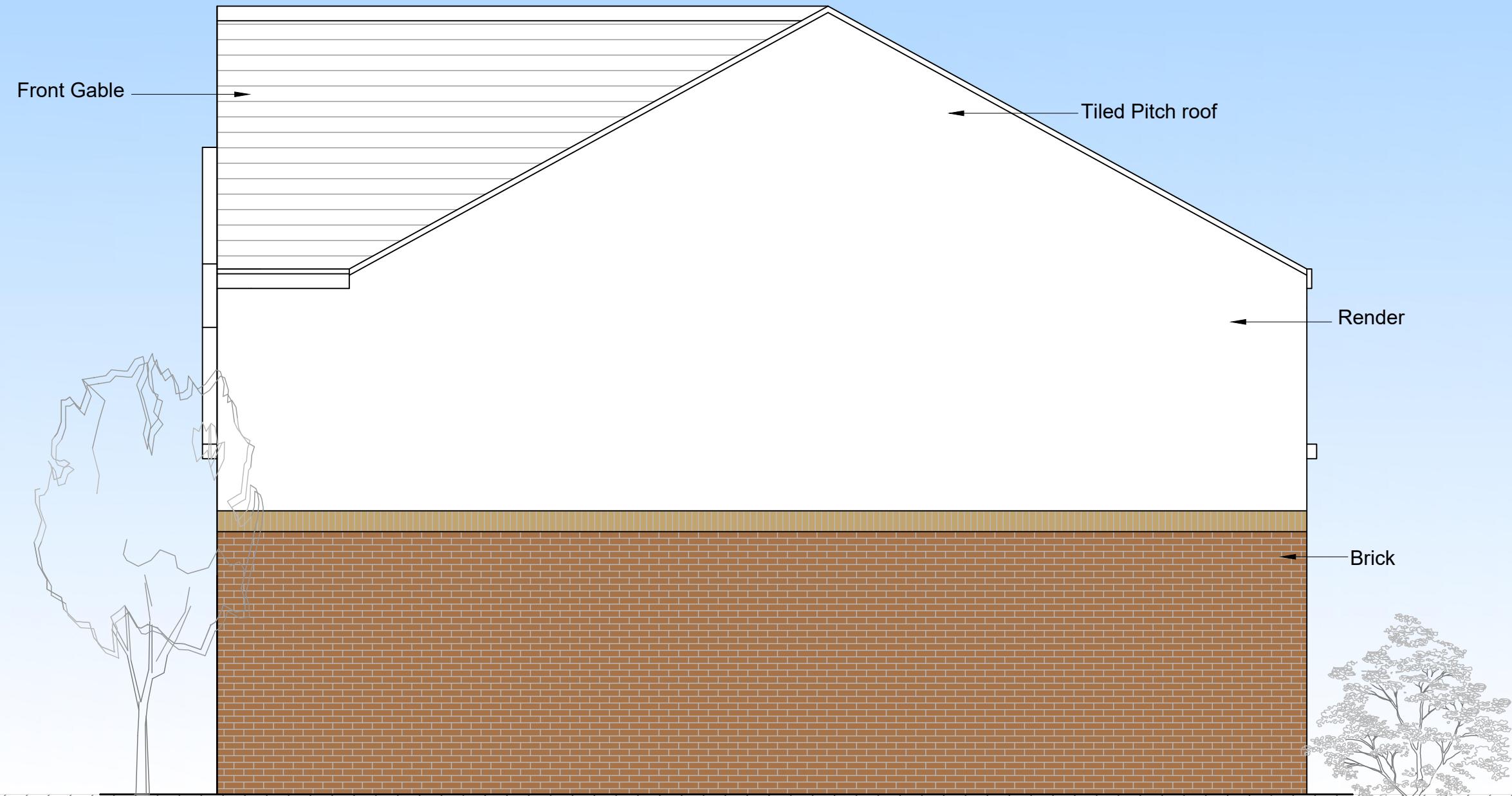
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Drawing number

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Proposed Side Elevation

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Project

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Drawing title

Proposed side elevation

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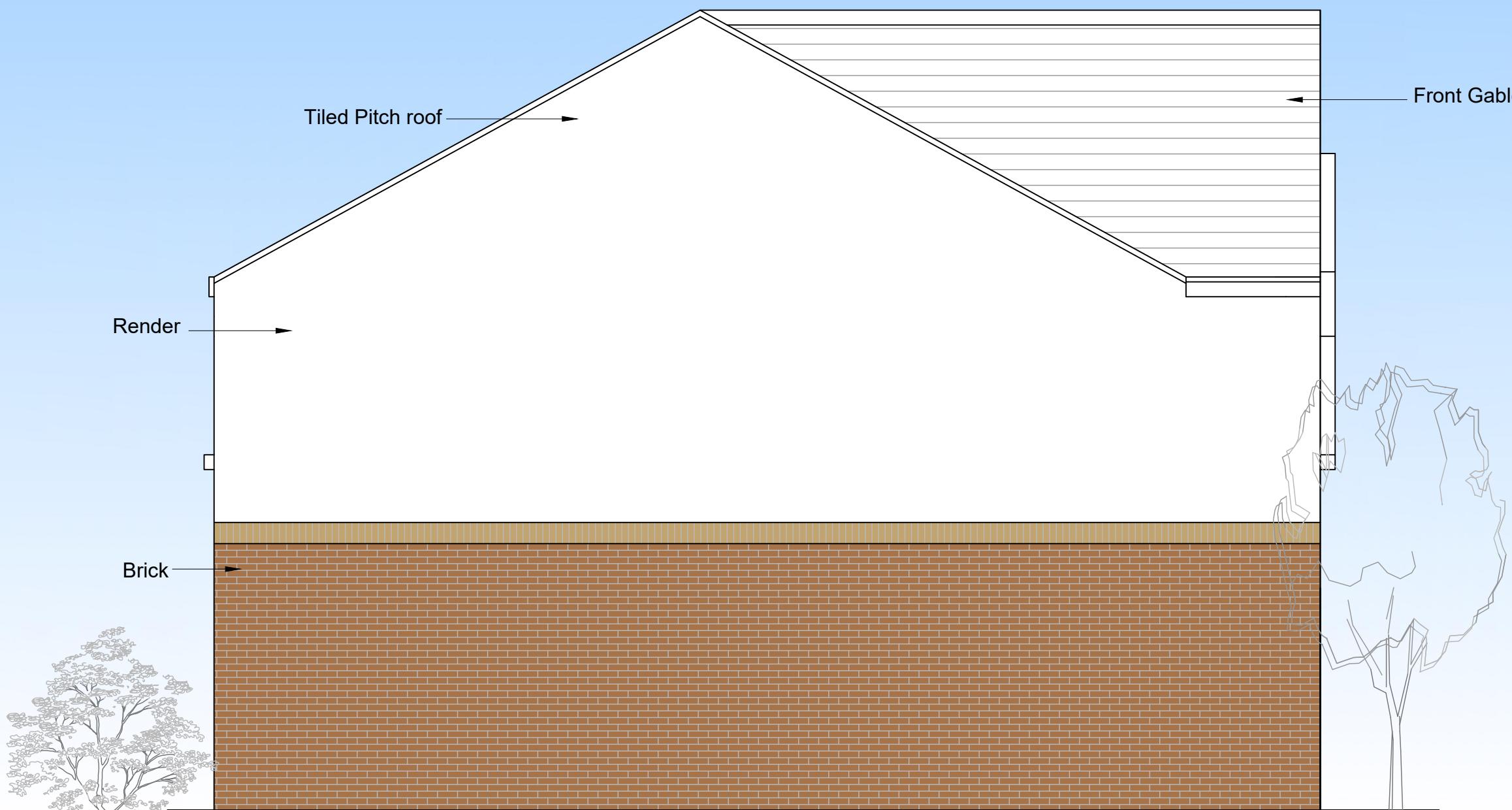
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Drawing number Revision

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Proposed Side Elevation

Client

Revisions

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Project

Rear of 164 Harefield Rd, UB8 1PP

Drawing title

Proposed side elevation

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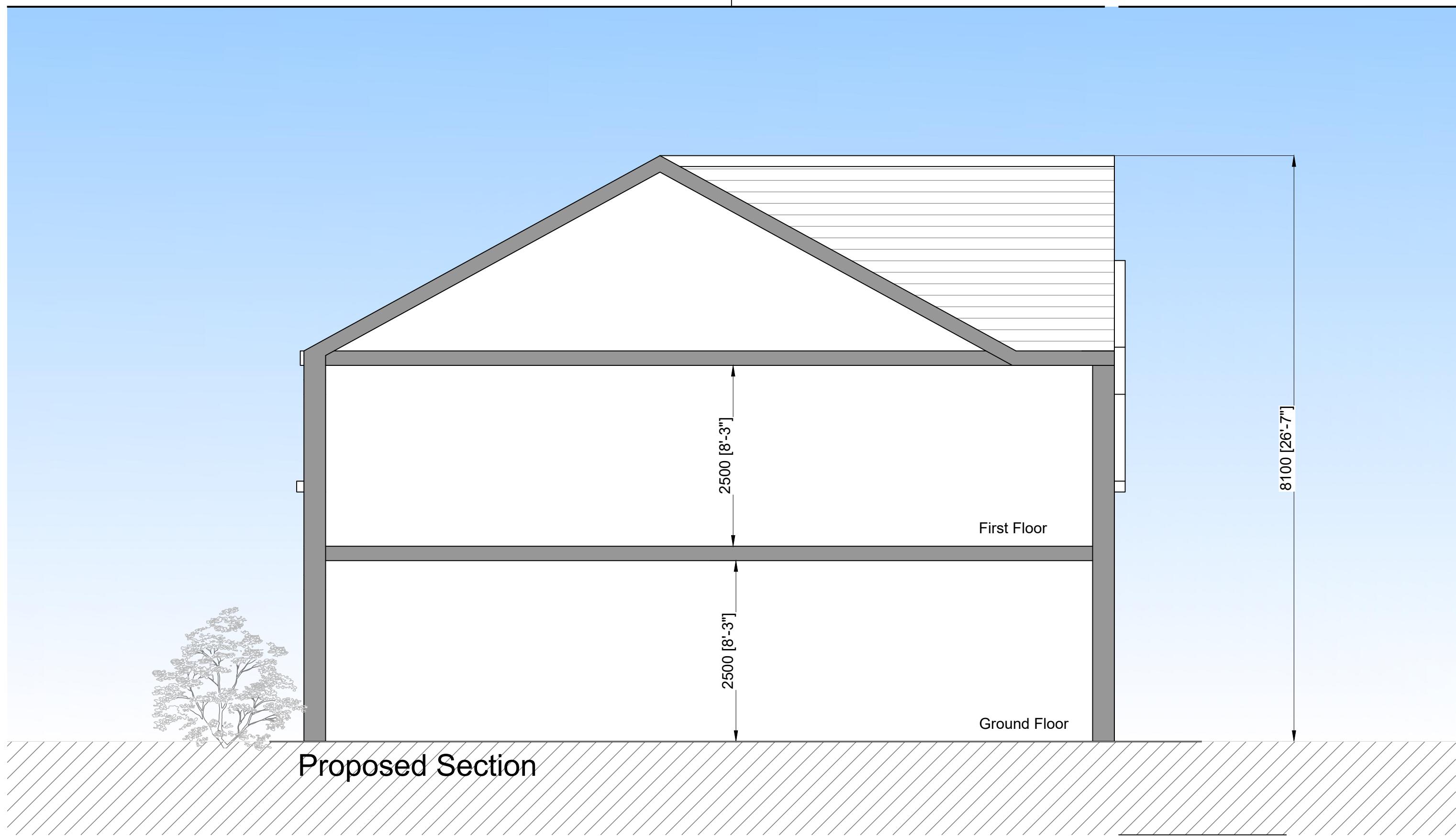
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203



Client

Revisions

Project

Rear of 164 Harefield Rd, UB8 1PP

Drawing title

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23777

Drawing number

204

Revision

Appendix 2 Current Habitat Overview



Appendix 3 Proposed Habitat Overview

