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Emilie Bateman  
LBH Planning

25 September 2025

Dear Emilie,

78323/APP/2025/2309 – 140 Linden Avenue – Condition 8

### Introduction

The applicant has submitted the Biodiversity Net Gain ('BNG') Metric prepared by the Environment Bank, which demonstrates an excess of 10% uplift in BNG secured off-site.

### Approach

As agreed by the Local Planning Authority ('LPA') in confirming through the approval of the S.73 application (LPA Ref: 78323/APP/2025/1759) on-site BNG uplift is not achievable. This is because the only land available is private gardens, which is not appropriate for BNG uplift.

### The Planning Condition

The planning condition states:

*No development shall take place on any part of the site until a Biodiversity Gain Plan for the site, demonstrating compliance with the 10% biodiversity net gain requirement in accordance with the Environment Act 2021, has been submitted to and approved in writing by the Local Planning Authority. The Biodiversity Gain Plan should include:*

- i. Baseline Biodiversity Assessment: Using the latest Defra Biodiversity Metric, a report of the site's pre-development biodiversity value; and*
- ii. On-Site Enhancement and 30-year Habitat Management Plan (HMP) detailing measures to achieve BNG on-site, including species protection, habitat creation,*



and ongoing management strategies to maintain gains for a minimum of 30 years. The HMP should, as a minimum, include:

- a) Description and evaluation of the features to be managed.
- b) Aims, objectives and targets for management.
- c) Description of the management operations necessary to achieving aims and objectives.
- d) Prescriptions for management actions.
- e) Preparation of a works schedule, including an annual works schedule.
- f) Details of the monitoring needed to measure the effectiveness of management.
- g) Details of the timetable for each element of the monitoring programme.
- h) Details of the persons responsible for the implementation and monitoring.
- i) Report to the Council routinely regarding the state of the Biodiversity Net Gain requirements for development in years 1 (post-completion), 3, 5, 10, 20, and 30, with biodiversity reconciliation calculations at each stage.

Where a biodiversity net gain of 10% is not achievable on site, in addition to the Baseline Biodiversity Assessment (i), the following shall be included in the BGP:

iii. Off-Site Biodiversity Credits or Statutory Credits: Where on-site measures do not achieve the 10% net gain, confirmation of the purchase of off-site biodiversity credits or statutory credits must be provided, including a receipt or proof of transaction as part of the Plan

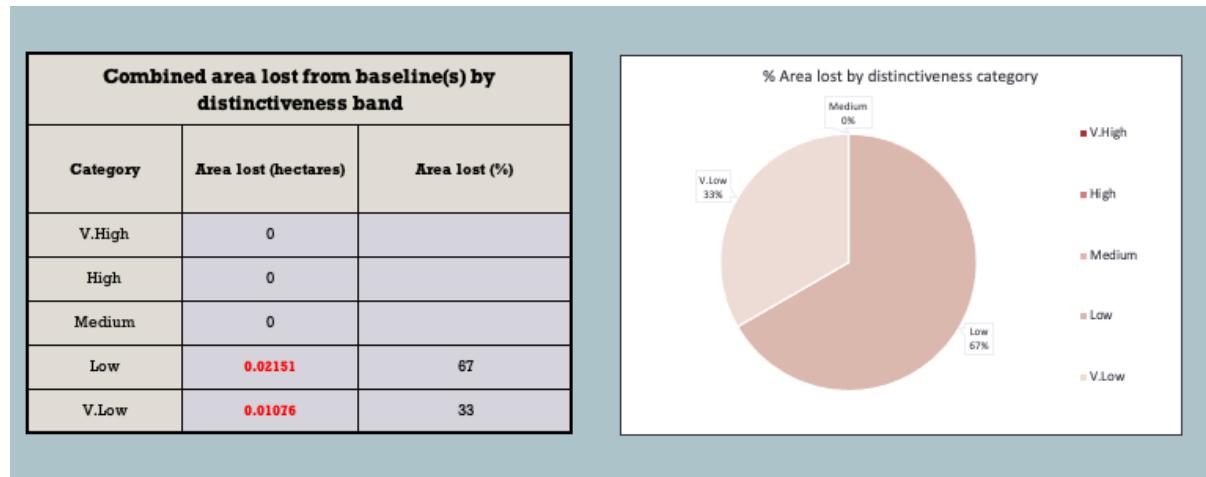
The approved Biodiversity Gain Plan shall be strictly adhered to, and development shall commence and operate in accordance with it.

#### REASON

To ensure the development delivers a Biodiversity Net Gain and secures the protection and effective management of the remaining habitat on site in accordance with Policy 15 of the National Planning Policy Framework, Policy G6 of The London Plan, and Policy DMEI 7 (Biodiversity Protection and Enhancement) of Hillingdon Council's Local Plan Part 2 Development Management Policies.

*i. Baseline Biodiversity Assessment: Using the latest Defra Biodiversity Metric, a report of the site's pre-development biodiversity value*

The on-site baseline is contained in the BNG Metric submitted, it is 0.06 habitat units. An extract is provided below:



It is contained in the 'Detailed Results' section of the excel sheet B-LHIL2504-MST-V01.

*iii. Off-Site Biodiversity Credits or Statutory Credits: Where on-site measures do not achieve the 10% net gain, confirmation of the purchase of off-site biodiversity credits or statutory credits must be provided, including a receipt or proof of transaction as part of the Plan*

As above, BNG is not achievable on site, the applicant has purchased credits from the Environment Bank a leading provider in BNG credits. The details are set out below.

### Biodiversity Unit Procurement

We have secured the necessary biodiversity units through EBL HB Ltd, a certified provider of off-site biodiversity credits. This partnership ensures that our development contributes to meaningful habitat restoration and enhancement projects that deliver genuine ecological value.

### Site Registration and Verification

The off-site biodiversity contributions are officially registered under reference number BGS-040924002 on the Biodiversity Gain Site Register. This registration provides transparency



and accountability, allowing stakeholders to track and verify the environmental outcomes of our investment.

### **Legal Protection Mechanism**

The habitat enhancements are secured through a conservation covenant administered by RSK Biocensus Ltd. This legal instrument provides long-term protection for the enhanced habitats, ensuring that the biodiversity benefits persist well into the future and cannot be reversed or compromised by subsequent land use changes.

### **Regulatory Compliance Confirmation**

The biodiversity units have been formally confirmed and validated on the Government Statutory Register (GSR) under reference BNGREG-K7WLG-A6H91. This confirmation demonstrates full compliance with statutory biodiversity net gain requirements and provides regulatory certainty for the project.

### **Proof of Credits**

Enclosed is the certificate confirming the purchase of the credits by the applicant.

### **Conclusion**

This letter successfully demonstrates full compliance with the statutory 10% biodiversity net gain requirement under the Environment Act 2021 and satisfies all elements of the planning condition.

The baseline biodiversity assessment establishes the site's pre-development value at 0.06 habitat units using the latest Defra Biodiversity Metric. As previously agreed with the Local Planning Authority through the approved S.73 application, on-site biodiversity enhancement is not feasible due to the unavailability of suitable land beyond private gardens.

To address this constraint, the applicant has secured off-site biodiversity credits through EBL HB Ltd, delivering more than the required 10% net gain. The procurement is comprehensively documented with:

- Official registration on the Biodiversity Gain Site Register (BGS-040924002)
- Long-term habitat protection through a conservation covenant administered by RSK Biocensus Ltd

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- Regulatory validation on the Government Statutory Register (BNGREG-K7WLG-A6H91)
- Formal proof of credit purchase certificate

This approach ensures that the development not only meets its statutory obligations but contributes to meaningful ecological enhancement through professionally managed off-site habitat restoration. The robust legal and regulatory framework provides long-term certainty that the biodiversity benefits will be maintained and protected in perpetuity.

The development can therefore proceed with confidence that all biodiversity net gain requirements have been fully satisfied in accordance with national and local planning policy.

Yours sincerely,

Planning Insight