

BIODIVERSITY NET GAIN REPORT

EXECUTIVE SUMMARY

ECOassistance were commissioned to carry out a Biodiversity Net Gain (BNG) assessment for a site known as: Gondar Gardens, Site to the Rear of 12 Sarre Road, London, NW2 3SL. The site is to be the subject of an upcoming planning application for:

Erection of a two storey single family dwelling house in the rear garden fronting Gondar Gardens, with rear garden, bin and bike store. Under the current proposals minor habitat losses are unavoidable.

Without on-site or off-site intervention the proposals are expected to lead to a 0.01 unit deficit of the habitat units required to achieve the mandatory +10% BNG.

It was concluded that it is not possible to provide +10% BNG through on site interventions. BNG +10% will need to be secured through purchasing the requisite number of credits to meet the BNG obligation off site through an off-site provider.

This assessment has been undertaken so that the planning application can be validated. The biodiversity metric tool has been provided to the client separately for the purpose of seeking out an off-site provider of biodiversity units.

The off-site provider will create or enhance habitats to generate biodiversity units to fill the 0.01 unit deficit of habitat units. The units provided will be subject to a spatial risk multiplier and the biodiversity metric tool will calculate the value of off-site actions relative to the project. In real terms it is likely that >0.01 units will be required to be purchased off-site because of the special risk multiplier.

Table 1: Headline results table (screenshot)

Gondar Gardens, Site to the Rear of 12 Sarr		Return to results menu		
Headline Results				
Scroll down for final results ▲				
On-site baseline	Habitat units	0.01		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site net change (units & percentage)	Habitat units	-0.01		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site baseline	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.01		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.01		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-88.26%		
	Hedgerow units	0.00%		
	Watercourse units	0.00%		
Trading rules satisfied?		No - Check Trading Summaries ▲		
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	0.01	0.01	0.01
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

Client Name:	Norma Jones	
Date of Completion:	13/08/2024	
Doc. Version Control:	1.0	
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DISCLAIMER		
This report considers the instructions and requirements of the client and is not intended for and should not be relied upon by any third party. In accordance with current good practice guidance, the results contained within this report can be relied on for decision-making purposes without the need to be updated for six months providing there is no significant change in land use or land management in that time. Interpretations and recommendations contained in this report represent the author's professional opinions. They are based on currently accepted industry practices and personal experience. This is a working document and must be updated if development proposals change, or new information become available.		

CONTENTS

Executive summary	1
Introduction	5
BNG requirements	5
Mitigation Hierarchy	6
Statutory Obligations	6
Relevant Legislation and Planning policies	6
Site aims and objectives.....	7
Constraints and Limitations	8
Methodology.....	9
Baseline Assessment.....	9
Calculating Units	9
Principles and Rules of the Biodiveristy matrix	10
Principles	10
Rules.....	10
Results.....	12
Baseline habitats.....	12
Hardstanding (u1b)	12
Grassland (u1~, 828)	12
Introduced Shrub (h2B).....	12
Baseline assessment scores	13
Baseline impacts	13
Unit change	14
Conclusion & Recommendations.....	16
References	17
Appendix 1: Exisiting/ Proposed Block Plan.....	18
Appendix 4: Screenshots of BNG metric.....	19

INTRODUCTION

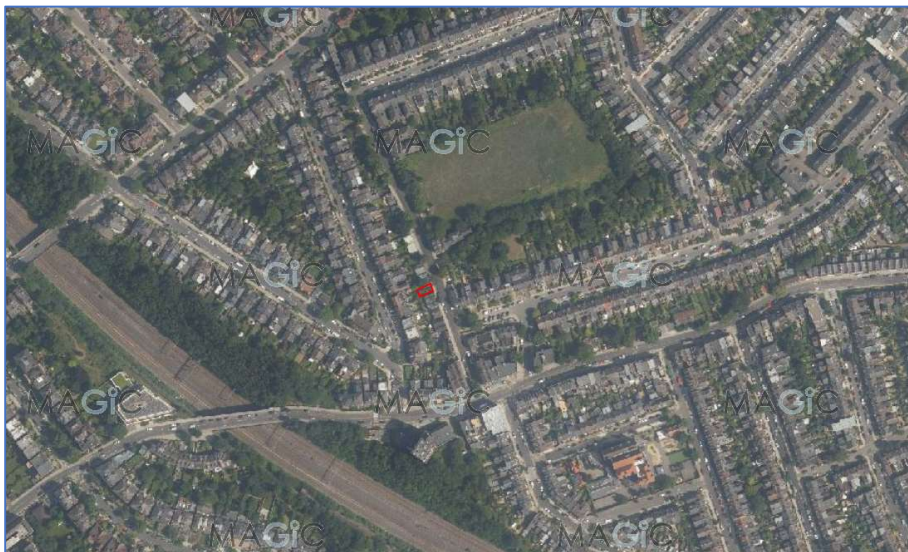
ECOassistance have been commissioned by Norma Jones (Hereafter: the client) to undertake a Biodiversity Net Gain (BNG) assessment and provide an outline of how to achieve +10% at Gondar Gardens, Site to the Rear of 12 Sarre Road, London, NW2 3SL (Hereafter referred to in this report as: the site). The grid reference for the approximate centre of the site is: TQ 24763 85206.

The site is in West Hampstead in northwest London and falls within the Camden Council Local Planning Authority (LPA).

The site is within a dense residential area. The habitats that are present within the site are consistent with those of the neighbouring properties in the immediate surrounding area.

An overhead satellite image with indicative red line boundary of the site and the habitats it contains, shown within the context of those in the wider area is shown in Figure 1 below.

Figure 1: Overhead satellite image of the red line boundary (indicative) of the site



This report will support a planning application for development of the site as described below:

Erection of a two storey single family dwelling house in the rear garden fronting Gondar Gardens, with rear garden, bin and bike store.

BNG REQUIREMENTS

Mandatory Biodiversity Net Gain, as part of the Environment Act (2022), came into place for all minor developments from April 2024. The National Planning Policy Framework (NPPF) states that planning policy should identify and pursue opportunities for securing measurable gains for biodiversity.

The national target for mandatory biodiversity net gain is 10%, although local targets may differ, and local planning strategies should be consulted. Camden Council LPA indicates that a minimum 10%

biodiversity net gain above the ecological baseline for an application site, and so this will be adopted by the project.

The current model for assessing biodiversity net gain (used in this report) is the Natural England Biodiversity Metric 4.0.

MITIGATION HIERARCHY

Biodiversity metric 4.0 follows the mitigation hierarchy, which is an important principle of ecological good practice. The mitigation hierarchy prioritises habitat retention and minimising habitat damage so far as possible, before looking to enhance or recreate habitats. This sequential approach is encouraged by the biodiversity metric because it allows overall biodiversity gains to be achieved more easily through the avoidance of on-site habitat losses, rather than relying solely on the creation of new habitat or the enhancement of existing habitat. It works this way because the metric applies multipliers that are based on the risks inherent in creating or restoring habitat, and which are not applicable when existing habitat is safeguarded.

The Biodiversity Metric includes a rule which mandates that lost habitats must be compensated for on a “like for like” or “like for better” basis. As such, new or restored habitats should aim to achieve a higher distinctiveness and/or condition than those to be lost.

STATUTORY OBLIGATIONS

The use of the biodiversity metric does not negate the projects statutory obligations in relation to protected species and habitats. The PEA report should be referenced for details of these obligations.

RELEVANT LEGISLATION AND PLANNING POLICIES

Relevant legislation implications for this site include:

- The Conservation of Habitats and Species Regulations 2010 (as amended);
- The Wildlife and Countryside Act 1981 (as amended);
- The Countryside and Rights of Way Act 2000;
- The Natural Environment and Rural Communities Act (NERC Act) 2006;
- Environment Act (2022)

Planning policies, both local and national, may affect any proposed development. Relevant planning policies to this development include;

- National Planning Policy Framework (NPPF)

- Draft New Camden Local Plan January 2024 ¹

SITE AIMS AND OBJECTIVES

The aim of the BNG assessment is to:

- Provide a baseline assessment of the habitats on the site using the DEFRA metric.
- Provide a predicted score based on proposed habitat creation and enhancement using DEFRA metric.
- Provide suitable long term management recommendations, for the site, to ensure habitats reach and maintain their desired condition.

¹ <https://www.camden.gov.uk/documents/20142/4820180/Draft+New+Camden+Local+Plan+2024+v1.pdf/415cc7da-c24a-8237-ddc2-5c72045af9d2?t=1706548115256#page=309&zoom=100,0,0>

CONSTRAINTS AND LIMITATIONS

The area measurements are based on QGIS software and georeferenced drawings of the site block plans as provided by the architect or client.

METHODOLOGY

A Biodiversity Net Gain Assessment has been conducted using the free and open-source geographic information system QGIS alongside the Natural England Biodiversity Metric 4.0.

The methodology as set out in the Biodiversity Metric 4.0 User guide has been followed. The Biodiversity Metric 4.0 converts habitats into 'biodiversity units' which are the 'currency' of the metric.

BASELINE ASSESSMENT

The BNG assessment is based on data collected during a site visit undertaken by ECOassistance on 29/07/24.

The baseline assessment is calculated by categorising the habitats on site into the corresponding UK Habitat Classification and feeding these into the metric. The metric then assigns the habitat distinctiveness.

A strategic significance is also assigned to each habitat type. Strategic significance relates to the spatial location of a habitat parcel and works at a landscape scale. It gives additional value to habitats of strategic importance to that local area.

Biodiversity metric 4.0 uses habitat condition as one of the measures of habitat quality. The condition assessment measures a habitat parcel against the ecological optimum state for that particular habitat. The biodiversity metric provides a list of assessment criteria for each habitat type. The condition of the habitat is then assessed against these criteria; the more criteria present within the habitat the higher the assessed condition.

CALCULATING UNITS

Biodiversity units are calculated using both the size and quality of a parcel of habitat. The metric uses habitat area (measured in hectares) as its core measurement, except for linear habitats (hedgerows and lines of trees and rivers and streams) where habitat length (measured in kilometres) is used.

To assess the quality of a habitat biodiversity metric 4.0 scores:

- **Habitat type**, such as woodland or grassland, according to their relative biodiversity value or distinctiveness. Habitats that are scarce or declining typically score highly relative to habitats that are more common and widespread.
- **Habitat condition**, scoring the biodiversity value of the habitat relative to others of the same type.
- **Habitat location and connectivity**. Being 'better' and 'more joined-up' are important facets of habitats that can contribute to halting and reversing biodiversity declines, so the metric also accounts for whether or not the habitat is sited in an area identified, typically in a relevant local strategy or plan, as being of strategic significance for nature.

PRINCIPLES AND RULES OF THE BIODIVERSITY MATRIX

PRINCIPLES

The Biodiversity matrix works under the following principles;

- Principle 1: The metric does not change the protection afforded to biodiversity. Existing levels of protection afforded to protected species and habitats are not changed by use of this or any other metric. Statutory obligations will still need to be satisfied.
- Principle 2: This metric should be used in accordance with established good practice guidance and professional codes.
- Principle 3: This metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
- Principle 4: Biodiversity units are a proxy for biodiversity and should be treated as relative values.
- Principle 5: This metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.
- Principle 6: Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
- Principle 7: Created and enhanced habitats should seek, where practical and reasonable, to be local to any impact and deliver strategically important outcomes for nature conservation. Where possible compensation habitats should contribute towards nature recovery in England by creating 'more, bigger, better and joined up' areas for biodiversity.
- Principle 8: The metric does not enforce a minimum habitat size ratio for compensation of losses. However, proposals should aim to:
 - Maintain habitat extent (supporting more, bigger, better and more joined up ecological networks) and
 - Ensure that proposed or retained habitat parcels are of sufficient size for ecological function.

RULES

The following rules apply to the Biodiversity Metric 4.0;

- Rule 1: Competency requirements must be complied with.
- Rule 2: Biodiversity unit outputs are unique to this metric. The results of other metrics, including previous versions of this metric, are not comparable to those of this metric. The three types of

biodiversity units generated by this metric (area, hedgerow and watercourse) cannot be summed, traded, or converted between modules.

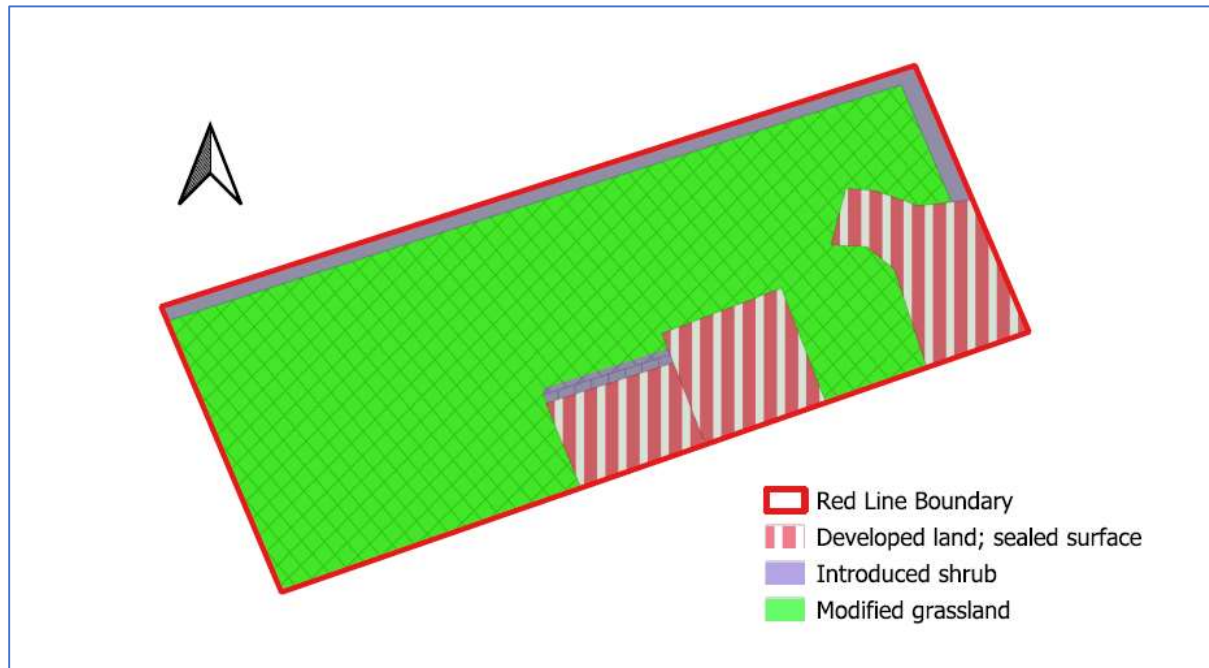
- Rule 3: The trading rules of this metric must be followed as set out in Section 3.2 of the Biodiversity Metric 4.0 User Guide. 'Trading down' must be avoided. Losses of habitat are to be compensated for on a "like for like" or "like for better" basis. New or restored habitats should aim to achieve a higher distinctiveness and/or condition than those lost.
- Rule 4: Losses and deterioration of irreplaceable or very high distinctiveness habitat cannot be accounted for through this metric.
- Rule 5: In exceptional ecological circumstances, deviation from this metric methodology may be permitted by the relevant consenting body or planning authority. Any deviation must be fully justified and evidenced, and follow advice as set out in the Biodiversity Metric 4.0 User Guide.

RESULTS

BASELINE HABITATS

The location and extent of the existing habitats within the site are shown in Figure 2 below. These are discussed in more detail in the subsections below.

Figure 2: Existing on-site habitat map



HARDSTANDING (U1B)

Located to the east of the site is a paved entrance with steps. There is a small shed and concrete area in the centre of site, adjacent to the southern boundary. There is a timber framed pergola above the concrete hardstanding.

GRASSLAND (U1~, 828)

A large proportion of the site comprises modified grassland.

INTRODUCED SHRUB (H2B)

There is sparse ornamental planting along the line of a timber fence on the northern and eastern site boundaries. The hedging is not mature and does not offer potential nesting opportunities for birds or roosting habitats for bats. In the northeastern corner of the site a small holly *Ilex aquifolium* bush has established. At the base of the holly a very small amount of bramble *Rubus fruticosus* is present.

A well-established grapevine *Vitis sp.* is prominent in the centre of the site. It has been grown over the timber pergola which stands over the concrete area of hardstanding immediately to the west of the shed.

BASELINE ASSESSMENT SCORES

The table below summarises the baseline habitat assessment for the site. The results of the baseline assessment indicate that there are a total of 0.01 habitat baseline units present on the existing site.

Table 2: Summary of BNG baseline assessment

On Site Area Habitats						
Broad Habitat	Habitat Type	Area (hectares)	Distinctiveness	Condition	Strategic significance	Total habitat units
Grassland	Modified grassland	0.0039	Low	Poor	Low Strategic Significance	0.0078
Urban	Developed land; sealed surface	0.001	V.Low	N/A - Other	Low Strategic Significance	0
Urban	Introduced shrub	0.0003	Low	Condition Assessment N/A	Low Strategic Significance	0.0006
Urban	Introduced shrub	0	Low	Condition Assessment N/A	Low Strategic Significance	0
On-site Habitat Baseline						0.01

BASELINE IMPACTS

The development will largely impact the modified grassland. Approximately 3m² of the grassland will be retained in the newly created back garden of the dwelling.

The minimal shrub habitats that are present will be lost to the development with the addition of approximately 2m² shrub planting (vegetated garden) post development.

Table 3: Baseline habitats retained/lost

Broad Habitat	Habitat Type	Area (hectares)	Area retained	Area enhanced	Baseline units retained	Baseline units enhanced	Area habitat lost	Units lost
Grassland	Modified grassland	0.0039	0.0003	0	0.00	0.00	0.00	0.01

Urban	Developed land; sealed surface	0.001	0.001	0	0.00	0.00	0.00	0.00
Urban	Introduced shrub	0.0003	0	0	0.00	0.00	0.00	0.00
Urban	Introduced shrub	0	0	0	0.00	0.00	0.00	0.00

Table 4: On-site Habitat Creation

Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness	Standard time to target condition (years)	Habitat created in advance (years)	Delay in starting habitat creation (years)	Habitat units delivered
Urban	Vegetated garden	0.0002	Low	1	0	0	0.00

UNIT CHANGE

The headline results of the DEFRA metric calculations for the site are shown below. More detailed results are available in the appendix. As can be seen in Table 5, the on-site net change in Habitat units is -88.26%.

Table 5: Headline BNG results

Gondar Gardens, Site to the Rear of 12 Sarr		Return to results menu		
Headline Results				
Scroll down for final results ▲				
On-site baseline	Habitat units	0.01		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site net change (units & percentage)	Habitat units	-0.01		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site baseline	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.01		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.01		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-88.26%		
	Hedgerow units	0.00%		
	Watercourse units	0.00%		
Trading rules satisfied?		No - Check Trading Summaries ▲		
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	0.01	0.01	0.01
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

CONCLUSION & RECOMMENDATIONS

Due to the small size of the site, creating new habitats on-site is not possible. Consequently, it is not feasible to meet the statutory BNG requirements through on-site measures, and the requisite net gain in habitat units must be provided through off-site interventions.

In order to achieve +10% BNG the client must purchase biodiversity units off-site. The client can send the populated Biodiversity Metric 4.0 tool that we have provided to an off-site provider. The populated metric tool will allow the off-site provider to see the number of units required and quote for providing them.

The Biodiversity Metric 4.0 incentivises off-site biodiversity gains in areas of strategic significance. Strategically significant areas are areas which are especially positive for off-site interventions, and are set in the Local Nature Recovery Strategy (LNRS). Where a LNRS is not yet available, your LPA may recommend you use a draft strategy, or an alternative strategy.

Some of the purchase options that are available :

- **Land Banking Providers:** These providers have land where they plan to create and enhance habitats once a developer purchases the units. The work starts after an agreement is made.
- **Habitat Banking Providers:** These providers already have nature restoration projects in progress. They offer a stockpile of biodiversity units that are ready to be used.
- **Broker:** These services facilitate the trading of biodiversity units. The brokers help developers meet their BNG obligations by connecting them with landowners or conservation projects that can provide the necessary biodiversity enhancements.
- **Trading Platform:** There are several platforms available for trading BNG units. These platforms help streamline the process by providing a marketplace for biodiversity units, ensuring that developers can meet their obligations.
- **Local Planning Authority:** Some LPAs provide a service selling biodiversity units.
- **Government Credits:** As a last resort, developers can purchase statutory biodiversity credits from the government. The revenue from these credits is used for habitat creation in England.

The proposed development, if the recommendations are followed, will provide an opportunity for a biodiversity net gain of +10%. The retention of areas of existing habitats outside of the footprint of the proposed development is important in ensuring the development achieves the required net gain.

REFERENCES

Environment Act (2021). C.30. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents>

H.M.S.O. (2017) Conservation of Habitats Species Regulations.

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Draft New Camden Local Plan January 2024

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The Countryside Rights of Way Act (2000) Available at:
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APPENDIX 1: EXISTING/ PROPOSED BLOCK PLAN



APPENDIX 4: SCREENSHOTS OF BNG METRIC

BASELINE HABITATS

Ref	Existing area habitats				Distinctiveness		Condition		Strategic significance			Required Action to Meet Trading Rules	Ecological baseline
	Broad Habitat	Habitat Type	Irreplaceable habitat	Area (hectares)	Distinctiveness	Score	Condition	Score	Strategic significance	Strategic significance	Strategic significance multiplier		Total habitat units
1	Grassland	Modified grassland	No	0.0039	Low	2	Poor	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required ≥	0.01
2	Urban	Developed land; sealed surface	No	0.001	V.Low	0	N/A - Other	0	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Compensation Not Required	0.00
3	Urban	Introduced shrub	No	0.0003	Low	2	Condition Assessment N/A	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required ≥	0.00
4	Urban	Introduced shrub	No	0	Low	2	Condition Assessment N/A	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	Same distinctiveness or better habitat required ≥	0.00

AREA HABITAT CREATION ON SITE

Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness		Condition		Strategic significance			Temporal multiplier						Difficulty multipliers				Habitat units delivered
			Distinctiveness	Score	Condition	Score	Strategic significance	Strategic significance	Strategic significance multiplier	Standard time to target condition (years)	Habitat created in advance (years)	Delay in starting habitat creation (years)	Standard or adjusted time to target condition	Final time to target condition (years)	Final time to target multiplier	Standard difficulty of creation	Applied difficulty multiplier	Final difficulty of creation	Difficulty multiplier applied	
Urban	Vegetated garden	0.0002	Low	2	Condition Assessment N/A	1	Area/compensation not in local strategy/ no local strategy	Low Strategic Significance	1	1	0	0	Standard time to target condition applied	1	0.965	Low	Standard difficulty applied	Low	1	0.00