



TUNLEY
ENVIRONMENTAL

BIODIVERSITY NET GAIN ASSESSMENT REPORT

TRUSTED SUSTAINABILITY SCIENTISTS

BIODIVERSITY NET GAIN EXEMPTION REPORT

FOR

Seven Oaks

in collaboration with

Holland Green

Contents

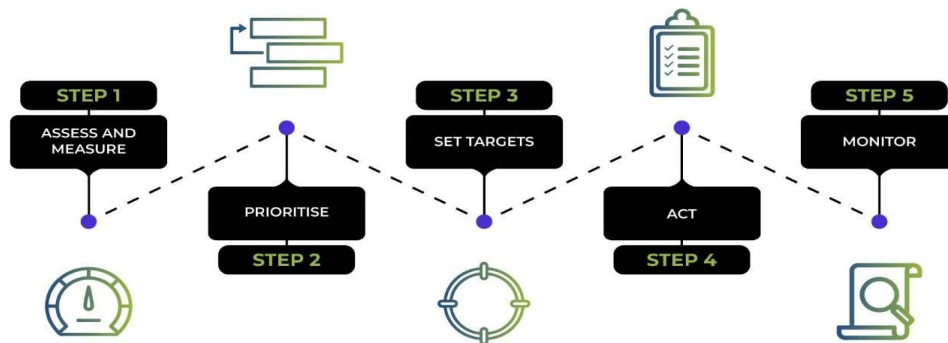
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Nomenclature

Nomenclature	Description
Baseline Assessment	Before a development project begins, a baseline assessment is conducted to determine the existing biodiversity of the project site. This assessment establishes the current state of habitats, species, and ecosystem functions.
Biodiversity	The variety of life within a defined area for example, globally or in a specific habitat which can be described by a variety of metrics including species abundance or the living plant index and which we are dependent on to provide us with food, clean water and many more essentials.
Biodiversity Loss	The reduction in the variety and abundance of species in a particular ecosystem or across the entire planet. It can result from factors such as habitat destruction, pollution, climate change, and invasive species.
Biodiversity Net Gain	A concept that aims to ensure that development projects have a positive impact on biodiversity by enhancing or creating habitats.
Biodiversity Net Gain (BNG) Assessment	The quantification of the overall positive impact on biodiversity resulting from a specific activity or project. While biodiversity gain refers to the increase in the numbers, genetic variability, and species variety in a given area, BNG goes a step further by assessing whether the difference between biodiversity losses and gains leads to a net positive impact.
Biodiversity Units	A measure to describe the level of biodiversity present on a given site.
DEFRA Statutory (Official) Biodiversity Metric	Is a tool developed by the UK Government that provides a standardised approach to quantifying changes in biodiversity resulting from development activities. It assigns values to different habitats and species based on their ecological importance, and it allows for the calculation of a numerical score that reflects the overall biodiversity impact of a development.
Habitat	The specific environment or type of ecosystem in which a particular species of organism lives. Habitats can range from forests and wetlands to grasslands and urban areas.
Habitat Condition	The state or quality of a habitat, taking into consideration factors such as biodiversity, ecological processes, and overall health. Habitat condition assessment is essential in determining the effectiveness of conservation or restoration efforts.
Habitat Distinctiveness	The unique characteristics and features that differentiate one habitat from another. Distinctiveness is often assessed based on the diversity of species, ecological functions, and physical attributes of a habitat.
Habitat Strategic Significance	The local importance of a habitat determined by assessing both its geographic location and the specific type of habitat it represents. This evaluation helps in understanding the unique value and contribution of the habitat in its surrounding ecosystem.
On-Site	Refers to activities, impacts, or features that occur within the boundaries of a specific development or project site. In the context of Biodiversity Net Gain, on-site measures may include habitat creation, enhancement, or protection within the project area.
Off-Site	Relates to actions or effects that occur outside the boundaries of the development or project site. Off-site measures in Biodiversity Net Gain may involve compensatory actions, such as creating or enhancing habitats in a different location to offset any biodiversity loss caused by the development.
Small Site	A small residential site is a development which is less than 1 hectare with less than 9 dwellings, or where the number of dwellings is unknown an area of less than 0.5 hectares. A small commercial site is a development which has created floor space of less than 1,000 m ² or with a total site area of less than 1 hectare.
Major Development	A major development is any development, either residential or non-residential, which falls out of the requirements of a small site. This means more than 9 dwellings or greater than 0.5 hectares for residential developments or greater than 1,000 m ² floor space, or over a hectare for non-residential developments.

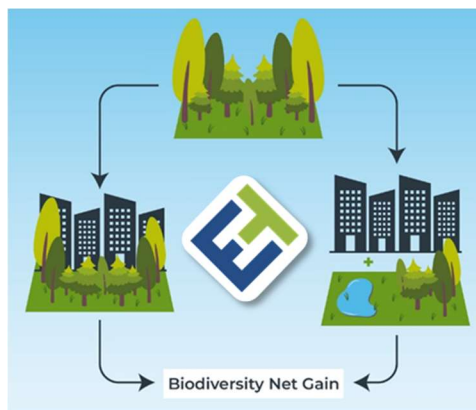
Methodology and Quantification Standards

This Biodiversity Net Gain (BNG) report has been completed using methodology consistent with the Science Based Targets for Nature (SBTN), Nature Positive Initiatives, and DEFRA Regulations.



Science-Based Targets for Nature Steps which Tunley Environmental's Biodiversity Net Gain (BNG) services aligns with to achieve reduced impact on Nature.

Biodiversity was quantified using the DEFRA (Department for Environment, Food & Rural Affairs) statutory (official) biodiversity metric as a tool to assess and measure biodiversity in the context of development projects. This metric is specifically designed to assist in quantification of the impact that development activities have on biodiversity and determine whether Biodiversity Net Gain (BNG) is achieved. Where BNG refers to the idea that the biodiversity value of a site should be enhanced due to development, ensuring a "net gain" in ecological terms. Tunley have completed all calculations within small site metric along with any required documents such as habitat condition. These additional documents will be submitted alongside this form in the excel format for LPA approval.



Tunley Environmental's conceptualisation of Biodiversity Net Gain.

Where applicable, the equivalent small site biodiversity metric was utilised for developments under the requirements for the statutory (official) biodiversity metric. The BNG assessment was further completed using methodology consistent with the international standard BS 8683:2021 (Process for designing and implementing BNG). Information on data sources and assumptions made to support this analysis are provided in Appendix A.

Executive Summary

Biodiversity is the foundation of the global economy. The World Economic Forum (WEF) estimates that over 50% of the world's GDP, equivalent to 33 trillion pounds, significantly depends on nature and the services it provides. However, biodiversity is amid a severe global crisis. Human-induced changes in land and sea use, overexploitation, invasive species, pollution, and climate change are the primary drivers of rapid biodiversity decline. Human activity threatens approximately a million species with extinction, some within decades, and species are disappearing at a rate of tens to hundreds of times faster than the natural pace.

Biodiversity net gain is a concept implemented into the *Town and Country Planning Act 1990* that aims to ensure that development projects in the UK, specifically England, have a positive impact on biodiversity by enhancing or creating habitats either on-site or off-site.

According to the UK government a major development is defined as a residential development where the number of dwellings is greater than 9 or the area is greater than a hectare, or if an unknown number of dwellings, the site area is more than 0.5 hectares. For a commercial development a small site is where floor space created is less than 1,000 square metres or the total site area is less than 1 hectare. The site is 2572 m² and plans propose 295 m² self-build property, therefore, this site is classified as a Small Site.

The site at Sevenoaks, 101a High Street, Hampton, TW12 2SX is a predominantly urban site with one priority habitats within 500 metres of the site and Holland Green (see [Magic Map Results section](#)). The site is being developed from a residential house with outbuildings into a new self-build property with landscaped gardens. The site has a total area of 2572 m², and plans propose 295 m², and therefore as stated in the Town and Country Planning Act, this site is classified as a Small Site.

However, the site at Sevenoaks, 101a High Street, Hampton, TW12 2SX does fall under the exemptions for Biodiversity Net Gain Requirements. As stated by *The Biodiversity Gain Requirements (Exemptions) Regulations 2024, regulation 8*⁽¹⁾:

“(1) The biodiversity gain planning condition does not apply in relation to planning permission for development which—

(a) consists of no more than 9 dwellings;

(b) is carried out on a site which has an area no larger than 0.5 hectares; and

(c) consists exclusively of dwellings which are self-build or custom housebuilding.

(2) In this regulation “self-build or custom housebuilding” has the same meaning as in section 1(A1) of the Self-build and Custom Housebuilding Act 2015”

Since this site is exempt, Tunley Environmental have *not* conducted an independent assessment to quantify the biodiversity value of the site before and after development to assess biodiversity of the site. Instead, this report justifies why the site is exempt from BNG regulations.

¹ The Biodiversity Gain Requirements (Exemptions) Regulations 2024 No. 47, Regulation 8. Available at <https://www.legislation.gov.uk/ukxi/2024/47/regulation/4/made>

Introduction

Biodiversity is the foundation of the global economy. The World Economic Forum (WEF) estimates that over 50% of the world's GDP, equivalent to 33 trillion pounds, significantly depends on nature and the services it provides. However, biodiversity is amid a severe global crisis. Human-induced changes in land and sea use, overexploitation, invasive species, pollution, and climate change are the primary drivers of rapid biodiversity decline. Human activity threatens approximately a million species with extinction, some within decades, and species are disappearing at a rate of tens to hundreds of times faster than the natural pace. Between 1970 and 2016, populations of mammals, birds, amphibians, reptiles, and fish have, on average, decreased by 68%. Human activity has dramatically altered 75% of the land surface, significantly impacted 66% of the ocean, and led to the loss of 85% of wetlands.

Recognising the severity of this crisis, the integration of Biodiversity Net Gain (BNG) and ecosystem restoration emerges as a crucial strategy for mitigating the adverse effects of human activities on biodiversity. BNG aims to ensure that development projects not only avoid causing harm to ecosystems but actively contribute to a net positive impact on biodiversity. By implementing measures such as habitat creation, restoration, and protection, BNG seeks to counterbalance the negative ecological footprint of development.

The particular site in question, which is a residential property with private gardens, to be a new self-build property with landscaped gardens, is situated in London Borough of Richmond upon Thames. Holland Green are consulting on this matter and have been asked to provide a biodiversity statement alongside the application. However, this site is exempt from the 10% BNG regulations according to *The Biodiversity Gain Requirements (Exemptions) Regulations 2024, regulation 8 and section 1(A1) of the Self-build and Custom Housebuilding Act 2015*. Therefore, this site does not require a complete BNG assessment.

Below shows the most recent aerial image of the site at Sevenoaks (Figure 1).



Figure 1. Aerial image of the site at Sevenoaks

Proposed plan with ecological initiatives implemented

Although Sevenoaks is exempt due to the self-build exemption, Holland Green have proposed plans which incorporate green infrastructure and benefit local ecology. As these are not BNG initiatives, nor is the site required to reach BNG due to exemption; Holland Green demonstrates a strong commitment to preserving nature by implementing these optional ecological measures including, a biodiverse green roof, new planting area, new pond, and new native hedgerows.

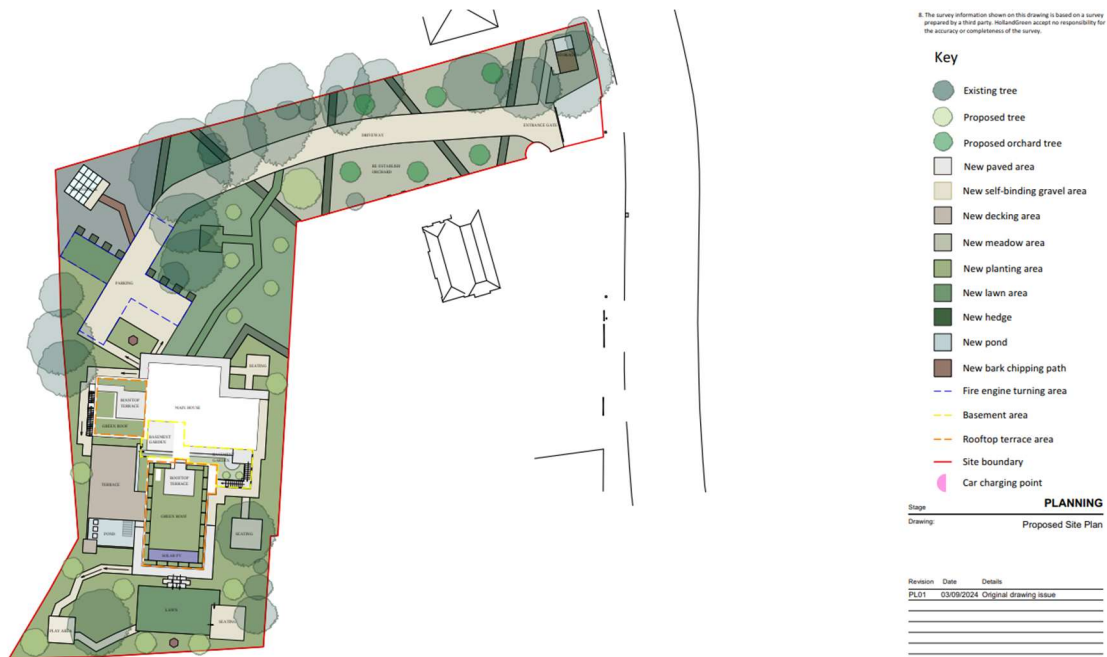


Figure 2. Proposed plan for the site.

Conclusion

The BNG assessment by Tunley Environmental have confirmed for the site *is exempt from 10% Biodiversity Net Gain regulations due to the self-build exemption*. Despite the site being exempt, the applicants demonstrate a commitment to ecosystem restoration and environmental infrastructure by implementing a biodiverse green roof, new planting area, new pond, and new native hedgerows.

Appendix

Ecological Initiatives Outside of BNG Regulations

Despite being exempt from BNG regulations due to the self-build exemption (see introduction), Holland green have undertaken extensive ecological initiatives to improve the biodiversity of the site outside of the BNG regulations. This includes adding 115 m² of biodiverse green roof to the new building, a pond, a new meadow area, a new planting area, retention of onsite trees and new native hedgerows. These initiatives will contribute positively to the onsite ecological outlook.

Justification for Exemption

The site at holland green is considered to be a self-build site under the Self-build and Custom Housebuilding Act 2015, which is considered under the following legislation:

“Registers of persons seeking to acquire land to build a home

(A1) In this Act “self-build and custom housebuilding” means the building or completion by—

(a) individuals,

(b) associations of individuals, or

(c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals.

(A2) But it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person.]

(1) Each relevant authority must keep a register of—

(a) individuals, and

(b) associations of individuals F2... ,who are seeking to acquire serviced plots of land in the authority's area [F3for their own self-build and custom housebuilding].

(2) Each relevant authority must publicise its register under this section.

(3) Relevant authorities are—

(a) district councils;

(b) county councils in England so far as they are councils for an area for which there are no district councils;

(c) London borough councils;

(d) the Common Council of the City of London;

(e) the Council of the Isles of Scilly.

(4) The Broads Authority is the relevant authority for the whole of its area, to the exclusion of any authority mentioned in subsection (3).

(5) A National Park authority in England is the relevant authority for the whole of its area, to the exclusion of any authority mentioned in subsection (3).

(6) Regulations may—

(a) provide for specified public authorities, or specified descriptions of public authorities, to be relevant authorities for specified areas in England, and

(b) provide for such an authority to be the relevant authority for its area to the exclusion of any other authority.

[F4(6A)] In this section—

“association of individuals” includes a body corporate that exercises functions on behalf of an association of individuals;

“completion” does not include anything that falls outside the definition of “building operations” in section 55(1A) of the Town and Country Planning Act 1990;

“home”, in relation to an individual, means the individual's sole or main residence.]

(7) For the purposes of this section the area of the Common Council includes the Inner Temple and the Middle Temple.

(8) The Schedule makes provision in relation to registers under this section.”

As Holland green are applying for planning permission under this regulation, the site is therefore exempt from the BNG regulations under *Regulation 8* of the biodiversity exemption regulations (see introduction).

Data Sources

All data results were analysed through the small site metric from DEFRA. The excel version of the metric will also be submitted alongside this report for further evidence and LPA approval and for compliance with BNG regulations.

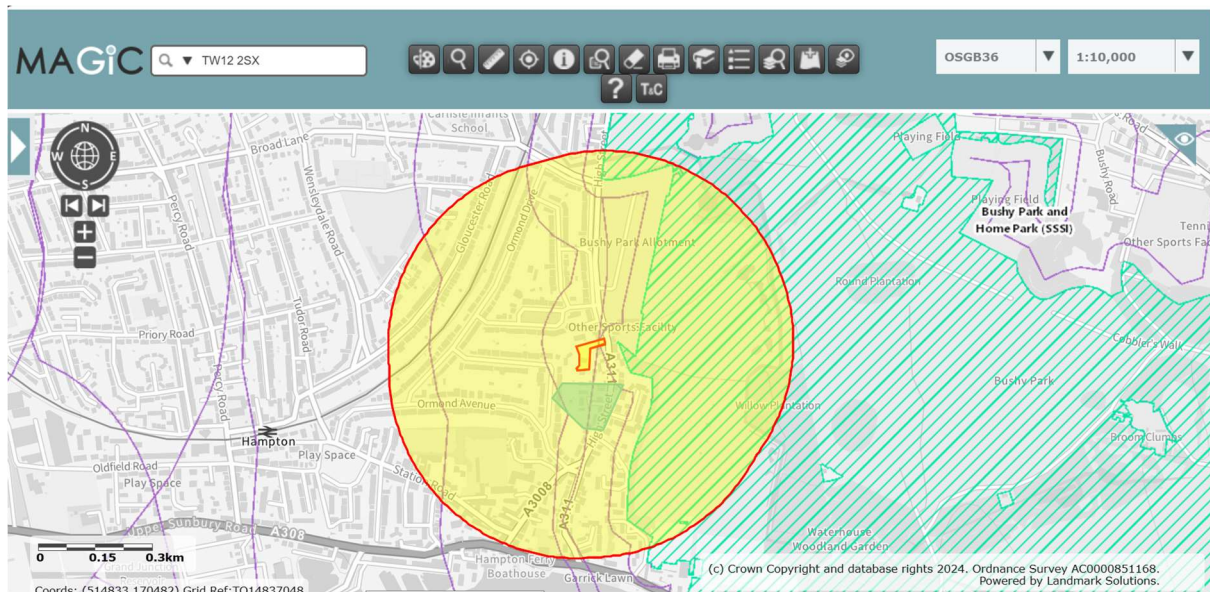
Habitat Classification and Justification

We conducted a thorough assessment of all habitat types utilising the guidelines outlined in "The UK Habitat Classification Version 2" (UKHab). UKHab serves as a comprehensive, hierarchical system that integrates seamlessly with existing classifications in the UK and Europe. It's architecture, inclusive of primary habitats and secondary codes, enhances the accuracy and consistency of habitat assessments by allowing for the direct attachment of additional features such as habitat mosaics and management strategies. This approach not only facilitates the integration of legacy datasets but also enables efficient sharing of habitat data at regional, national, and international levels. BNG Compliance adheres to these classifications, ensuring consistency and compliance with ecological standards. It's essential that a trained and certified ecologist completes the assessment. For more information, please visit: [UKHab](https://ukhab.org/).

Magic Map Results

The DEFRA Magic Map which maps out all designated sites (i.e., SSIs, Ramsar Sites, etc.) and UK priority habitats in the UK. The image below shows the site in the centre of the image along with a 500-metre buffer zone. There are no priority habitats within 500 metres of the site, however there is one designated site of special scientific interest area within 500

metres of the site: Bushy Park and Home Park SSSI. Although this is in close proximity to the site, as well as the site area being quite residential, the development project does not heavily impact the UK priority habitats.



Approval

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Revision:	A

Revision History:	Change Description:	Changed by:	Date:	Approved by:	Date:
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D					
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