Queen Mary's Hospital, Frognall Avenue, Sidcup

Biodiversity Net Gain Assessment

A Report for Gardiner & Theobald LLP

December 2023

Greenspace Ecological Solutions

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Queen Mary's Hospital, Frognall Avenue, Sidcup, Kent

Biodiversity Net Gain Assessment

Client:	Gardiner & Theobald LLP	
Project Ref:	Queen Mary's Hospital	
Report Ref:	J21334_P3	
Author:	**Technical Review:**	**Approval:**
Hana Ketley BA (Hons) BSc (Hons), Graduate Ecologist	Chris Bawler BSc (Hons) ACIEEM, Senior Ecologist	Lorna Roberts BSc (Hons) MSc ACIEEM
Revision Ref:	**Status/ Comment:**	**Date of Issue:**
-	Final	21st December 2023

Disclosure:

It should be noted that whilst every effort has been made to meet the client's requirements, no site survey can ensure a complete assessment or prediction of the changeable onsite environment.

Should more than 12 months elapse between the date of this survey and any subsequent development, it may be necessary to consider the need for an update survey to be undertaken.

CONTENTS

1 PROJECT OVERVIEW

Client: Gardiner & Theobald LLP

Site Address: Queen Mary's Hospital, Frognall Avenue, Sidcup, Kent, DA14 6LT

Lead Ecologist: Chris Bawler ACIEEM (Natural England Level 1 GCN licence)

Survey Date: PEA – 11th September 2023

Site Proposals: Re-development of the Community Diagnostic Centre (CDC).

Associated Planning Reference Number: Not yet submitted.

Source of Relevant Documents:

Document:	**Source:**
Associated Report(s):	Ecological Assessment (GES, 2023)
Proposed Development:	Landscape Plan, Murphy Philipps. (Drawing ref: QMH CDC-MP-XX-01-DR-A-01012-P2).

2 SUMMARY

2.1 Greenspace Ecological Solutions (GES) were commissioned by Gardiner & Theobald LLP to ensure a net gain in biodiversity is achievable within a proposed development at Queen Mary's Hospital, Frognall Avenue, Sidcup (hereafter referred to as 'the Site') post-development.

2.2 Assessed using the Small Sites Metric (Statutory Biodiversity Metric), the recommended habitat layout, as presented in Figure 2, results in a net gain of 0.0755 (+16.41%) habitat units.

2.3 Provided the recommended habitats and recommendations are implemented in full, the proposals for the Site will be compliant with the National Planning Policy Framework (2023) requirements for "providing net gains for biodiversity".

2.4 In addition, recommendations for ecological enhancements to further increase value of the Site for biodiversity were made within the Ecological Assessment (GES, 2023). These measures include the installation of:

- Bat boxes
- Wildlife-friendly planting scheme
- Bee bricks

3 INTRODUCTION

3.1 Context

3.1.1 Prepared on behalf of Gardiner & Theobald LLP, the following sets out the result of the Small Sites Metric (Statutory Biodiversity Metric) calculations undertaken for the Site.

3.1.2 In accordance with the National Planning Policy Framework (NPPF) (2023), sustainable development should *"protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

3.1.3 As of April 2024, in accordance with the Environment Act (2021), all proposals which meet the criteria for 'Small Sites' must demonstrate a minimum 10% net gain in biodiversity, unless exempt. Although the proposed development will not be exempt, as the planning application will be submitted prior to April 2024, the minimum 10% net gain stated above does not apply, though the proposed development will still need to demonstrate a net gain in biodiversity.

3.1.4 The planning proposals for the Site therefore seek to demonstrate a net gain in biodiversity in this instance.

3.2 Site Location

3.2.1 The Site is located in the town of Sidcup, in the London Borough of Bexley, in the southeast of London at National Grid Reference: TQ 46251 70923. The location of the Site is depicted in Image 1, overleaf.

Image 1 – Geographical Location of Queen Mary's Hospital (the Site)

3.3 Site Description

3.3.1 The Site occupies approximately 0.13ha and comprises predominantly bare ground with areas of grassland, hardstanding and one building.

3.3.2 The Site is bound by the wider hospital grounds to the north and east, and by amenity grassland with scattered trees and a road to the south and west.

3.3.3 The wider landscape is one of hardstanding, hospital buildings, woodland, grassland, residential properties with associated gardens and the A20.

3.4 Planning Policy and Legislation

Legislation

3.4.1 The recommendations within this report are in-line with Schedule 14 of the forthcoming Environment Act (2021) which states in part that:

"Para 2: 1) 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.

2) The biodiversity value attributable to the development is the total of –

a) the post-development biodiversity value of the onsite habitat,

b) the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and

c) the biodiversity value of any biodiversity credits purchased for the development.

3) The relevant percentage is 10%."

Planning Policy

3.4.2 The recommendations within this report are in-line with the key principles of the NPPF (2023) which states in part that:

"*Para 174: Planning policies and decisions should contribute to and enhance the natural and local environment by: (d.) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.*

Para 179: To protect and enhance biodiversity and geodiversity, plans should: (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.

Para 180: When determining planning applications, local planning authorities should apply the following principles: (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."

3.4.3 The recommendations within this report are in-line with Policy G6 of the London Plan (March 2021) which states, in part, that:

Policy G6 – Biodiversity and access to nature

"D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process."

3.4.4 The recommendations within this report are in-line with Policy SP9 of the Bexley Local Plan (adopted April 2023) which states, in part, that:

Policy SP9 – Protecting and enhancing biodiversity and geological assets:

"In its planning decisions, planning policies and action plans, the Council will protect and enhance the borough's biodiversity and geodiversity assets, in-line with national and regional policy, by:

f. Protecting and enhancing the natural environment, seeking biodiversity enhancements, net gains for biodiversity and improved access to nature, particularly in areas of deficiency through new development and projects that help to deliver the targets for habitats and species set out in the London Plan and local biodiversity action plans and strategies."

3.5 Objectives of Biodiversity Net Gain

3.5.1 The objectives of using the Small Sites Metric (Statutory Biodiversity Metric) were to:

- Ascertain the ecological value of the habitats currently present within the Site.
- Calculate the value of each habitat to be lost, retained, enhanced, or created.
- Provide recommendations regarding each of the above, in terms of the requirement for a Site-wide 'Net Gain' in ecological value, post-development.
- Provide optional site-appropriate recommendations for a further increase in ecological value beyond the minimum agreed-upon scope of the Small Sites Metric (Statutory Biodiversity Metric) results, where appropriate.

3.6 Constraints

3.6.1 Although every effort has been taken to accurately measure the extent of all habitats discussed herein, all measurements and indications of area given within this report remain approximate.

4 METHODS

4.1 Biodiversity Net Gain Assessment

4.1.1 The following excerpt is taken from the Small Sites Metric (Statutory Biodiversity Metric) User Guide (DEFRA, 2023). For further details, the reader is referred to the full guidance.

"The Statutory Biodiversity Metric builds on a series of previous versions of the biodiversity metric developed with input from Natural England, Environment Agency and the Forestry Commission, including authors and contributors cited in previous versions.

All versions of the biodiversity metric build on the biodiversity loss/gain framework developed by Jo Treweek and Bill Butcher, incorporating habitat condition and a new concept of distinctiveness scores, which was subsequently adopted by Defra and Natural England for their biodiversity offset pilots and metric."

4.1.2 Calculations have been carried out in accordance with Biodiversity Net Gain: Good Practice Principles for Development guidance (Baker *et al.*, 2019). Given the size and location of the Site, the calculations were undertaken using the Small Sites Metric (Statutory Biodiversity Metric).

4.1.3 The metric approach is the established method for calculating BNG and is one that provides a quantitative approach to losses and gains resulting from development or land management changes. Whilst the Statutory Biodiversity Metric is the default approach to calculating BNG, it should not be considered a complete tool and therefore professional judgement has been used where appropriate. Where professional judgement has been used, this is outlined in the text and additional references, where required, are provided.

4.1.4 The assessment was carried out by GES Senior Ecologist Chris Bawler BSc (Hons) ACIEEM and approved by GES Principal Ecologist Lorna Roberts BSc (Hons) ACIEEM.

4.1.5 The steps taken to calculate the BNG baseline and proposed development calculations followed those laid out in the Small Sites Metric (Statutory Biodiversity Metric) User Guide. The results of the full calculations are depicted in Appendix A.

4.2 Calculations

Baseline

4.2.1 The baseline figure for the Site has been informed by the field survey conducted in 2023 (GES, 2023).

4.2.2 The results of the Extended Phase 1 Habitat Survey are reported separately in the Ecological Assessment report (GES, 2023).

4.2.3 To calculate the baseline units for the Site, the following data was collated and reviewed, and the following assessments were carried out:

- To ensure compliance with the requirement of the BNG assessment and to determine the appropriate habitat classification, the field data collected during the Extended Phase 1 Habitat Survey was converted using UK Habitat Classification (UKHab) criteria. For the purpose of this report, the translation between Phase 1 and UKHab types followed the conversion table tool provided within the Small Sites Metric (Statutory Biodiversity Metric). Once converted, the habitats were automatically assigned a pre-set "distinctiveness" value, indicative of the inherent "value" of these habitats.
- The area (m^2) of each existing habitat and the length (m) of each existing linear habitat within the Site was calculated from Phase 1 Habitat mapping using ProgeCAD software. The Baseline Habitats Plan is presented in Figure 1.
- Habitats were subject to a strategic significance assessment based on their position within the landscape, and consideration was also given to the local plan to identify local priorities for targeting biodiversity.
- Baseline inputs (as detailed above) were entered into the Small Sites Metric (Statutory Biodiversity Metric) calculation tool.

Proposed

4.2.4 To calculate the proposed units for the Site, the following data was collated and reviewed, and the following assessments were carried out:

- The proposals were reviewed to identify which baseline habitats would be retained or enhanced, and which proposed habitats would be created. Proposed habitat types were described using UKHab terminology. Once entered into the metric, the habitats were automatically assigned a pre-set "distinctiveness" value, indicative of the inherent "value" of these habitats.
- The area (m^2) of each proposed habitat and the length (m) of each proposed linear habitat to be created within the Site was calculated using ProgeCAD software. The Proposed Habitats Plan is presented in Figure 2.
- All proposed habitats were assessed against a number of criteria, as described within the condition assessment sheets, to give each habitat a "condition" value. In order to do this for a proposed habitat, the likely management of these areas and any specifications (such

as specific seed mixes or design details) are taken into account to provide an informed judgement as to the condition that the proposed habitat is likely to achieve, post-development.

- Proposed habitats were also subject to a strategic significance assessment based on their position within the landscape, and consideration was also given to the local plan to identify local priorities for targeting biodiversity.
- The inputs detailed above were entered into the Small Sites Metric (Statutory Biodiversity Metric) calculation tool.

5 RESULTS

5.1 Headline Results

5.1.1 Headline results from the Small Sites Metric (Statutory Biodiversity Metric) calculator are presented in Table 1 below. The full results are presented in Appendix A.

5.1.2 The proposals will result in a **net gain of 0.0755 (16.41%) habitat units.** This result is in-line with the "providing net gains for biodiversity" requirement of the NPPF (2023).

Table 1 – Headline Results

Results category	Unit type	Units
On-site (baseline)	Habitat	0.4604
On-site (post-intervention)	Habitat	0.5359
On-site net change	Habitat	0.0755
Total net % change	**Habitat**	**+16.41%**

5.2 Detailed Results

Baseline Habitats

5.2.1 Baseline habitats present within the Site are presented in Table 2 and depicted in Figure 1.

Table 2 – Total baseline habitat areas, values and unit changes through proposed loss/enhancement

Broad habitat	Habitat type	Area (m^2)	Unit value	Retain/enhance?	Units Lost
Grassland	Modified grassland	357	0.14	Enhanced	**0.000**
Urban	Bare ground	794	0.32	No	**0.318**
	Developed land; sealed surface	126	0.00	Retained	**0.000**

Created Habitats

5.2.2 Habitats to be created on-site and their respective biodiversity unit values are presented in Table 4 and depicted in Figure 2.

Table 4 – Created habitat values

Broad habitat	Habitat type	Total area (m^2)	Total units delivered
Urban	Other green roof	238	**0.0459**
	Developed land; sealed surface	342	**0.0000**
Grassland	Other neutral grassland	214	**0.1798**

Enhanced Habitats

5.2.3 Habitats to be created on-site and their respective biodiversity unit values are presented in Table 5 and depicted in Figure 2.

Table 5 – Enhanced habitat values

Broad habitat	Habitat type	Enhanced to?	Total area (m^2)	Total units delivered
Grassland	Modified grassland	Other neutral grassland	357	**0.3102**

6 DISCUSSION AND CONCLUSIONS

6.1 Broad habitat type: Grassland

Modified Grassland

6.1.1 Modified grassland accounts for 357m^2 of the total Site area. This habitat is located around the peripheries of the Site and was assessed as 'Moderate' condition. The entirety of this habitat will be enhanced post-development to other neutral grassland.

Other Neutral Grassland

6.1.2 Post-development, an additional 214m^2 of other neutral grassland will be created across the Site, delivering 0.1798 habitat units. The target condition for this habitat is 'Moderate'.

6.1.3 In order to enhance the modified grassland into other neutral grassland, the modified grassland will be sown during the autumn or spring periods with a seed mix such as Emorsgate EM4F (or similar). Prior to over-sowing, the grassland should be mown as short as possible, and rakes/furrows created. To aid establishment of this seed mix through the suppression of vigorous grasses, yellow rattle *Rhiananthus minor* seed should be added to the mix at an amount of 1g/m^2.

6.1.4 The grassland will be managed to encourage a diverse botanical sward with a twice monthly mowing regime for the first two years to maintain a height of between 3 – 5cm. Once established, to allow flowering species to set seed and help limit the dominance of rank grasses, the grassland should be subject to a more relaxed management thereafter consisting of an annual or bi-annual cut. The use of fertilisers and pesticides will be avoided. This will create and maintain a grassland habitat of 'Moderate' quality. This will result in a gain of 0.3102 habitat units.

6.2 Broad habitat type: Urban

Other Green Roof

6.2.1 Although no green roofs exist at present within the Site, an extensive green roof (referred to as "other green roof" within the metric) with an area of 238m^2 will be installed on the proposed hospital extension post-development. The Bauder XF 301 green roof will comprise a variety of sedums and will deliver 0.0459 habitat units. The target condition for this green roof is "N/A" as it will not qualify as either biodiverse or intensive.

Bare Ground

6.2.2 The dominant habitat within the Site, bare ground accounts for 794m^2 of the total Site area. This habitat was assessed as 'Moderate' condition and will be lost in its entirety to the proposed development, resulting in a loss of 0.318 habitat units.

Developed Land; Sealed Surface

6.2.3 Developed land; sealed surface present within the Site has a cumulative area of 126m^2. This habitat includes the existing building, an access path and a small section of road on the Site boundary. The developed land; sealed surface habitat is to be retained as part of the proposed development and, as it has no biodiversity value, this will result in no loss of habitat units.

6.2.4 Due to the nature of the development, this habitat will increase in size, with the construction of an extension to the existing building and a new plant area with associated access and pavements comprising a cumulative area of 342m^2. This habitat has no biodiversity value and will deliver no habitat units.

6.3 Total Net Gain

6.3.1 Should the above strategy for biodiversity net gain across the Site be adhered to, habitat units are set to increase by 0.0755, resulting in a net gain of 16.41%.

7 REFERENCES

Baker J., Hoskin R., and Butterworth T. (2019) Biodiversity Net Gain: *Good Practice Principles for Development.* CIRIA. Available at: https://www.ciria.org/CIRIA/Resources/Biodiversity_Net_Gain.aspx

Bexley Local Plan (Adopted 26 April 2023). Available at: https://www.bexley.gov.uk/sites/default/files/2023-07/bexley-local-plan-adopted-26-april-2023.pdf

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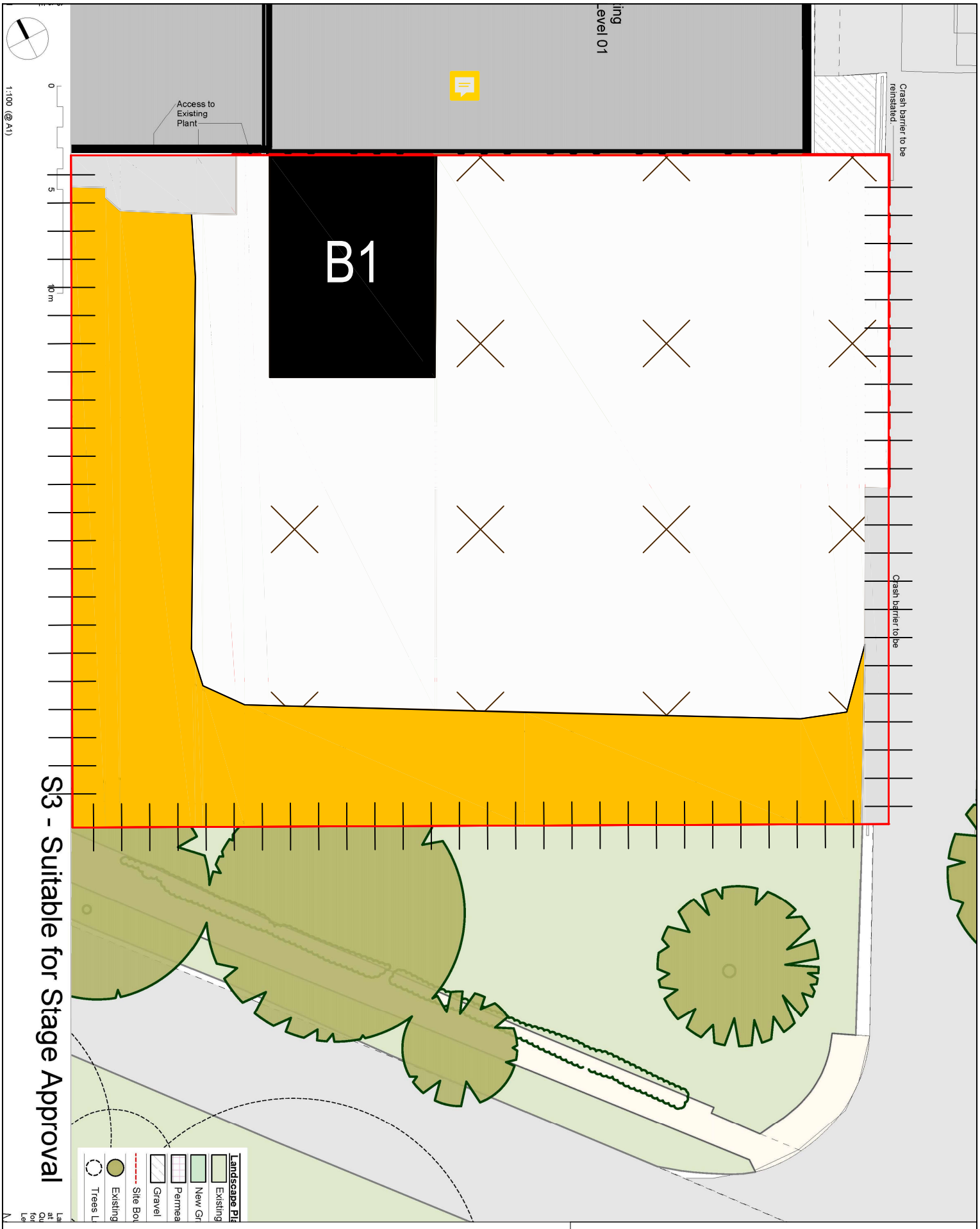
ODPM Circular 06/2005. *Biodiversity and Geological conservation – Statutory Obligations and their Impact within the Planning System* [Online]. ODPM: London. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7692/147570.pdf

UKHab Ltd (2023). UK Habitat Classification Version 2.0 [Online]. Available at: https://ukhab.org

Figures



Project Title: Queen Mary's Hospital, Sidcup

Job Reference: J21334_P3

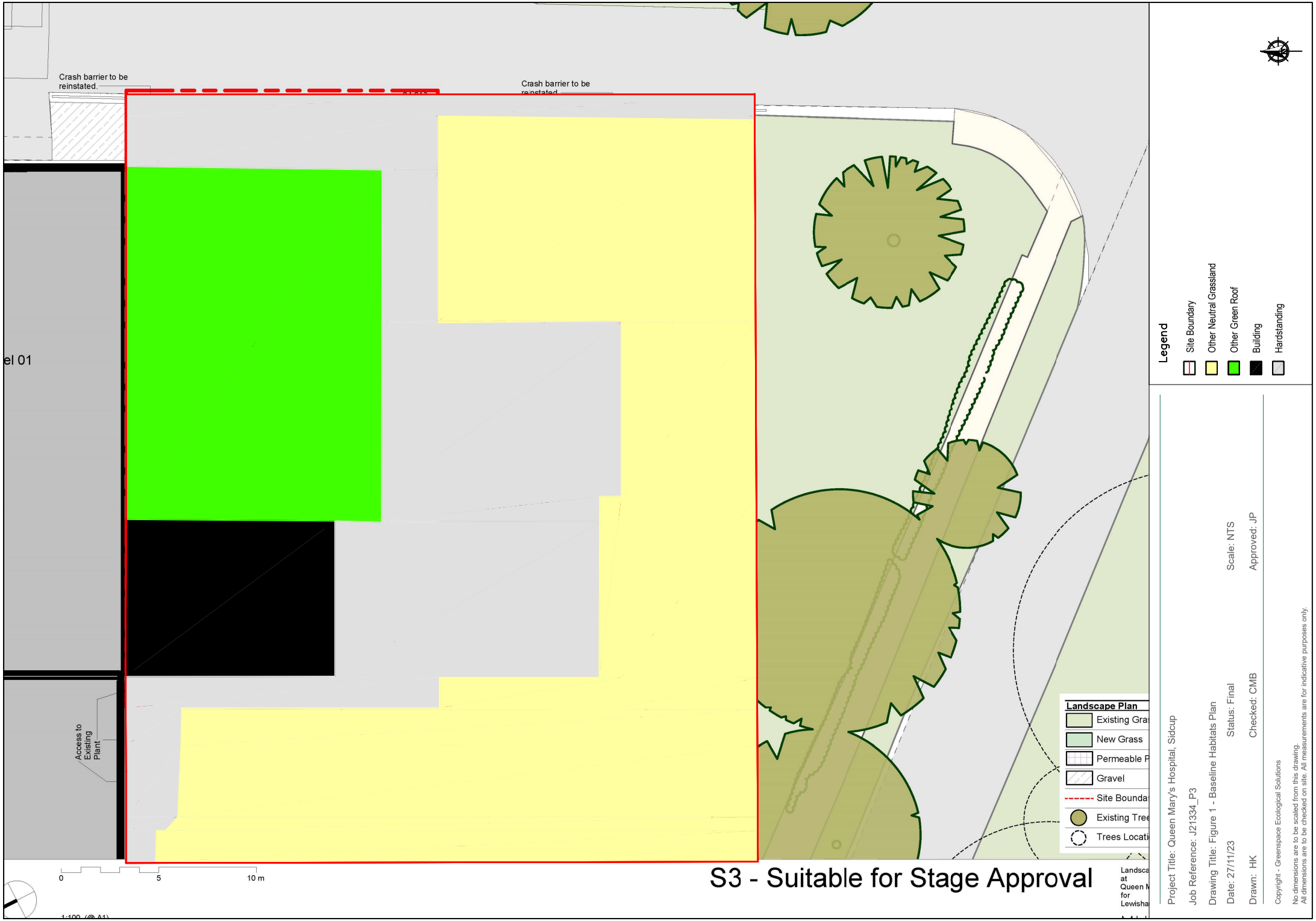
Drawing Title: Figure 1 - Baseline Habitats Plan

Date: 27/11/23 Status: Final Scale: NTS

Drawn: HK Checked: CMB Approved:

Legend

- Site Boundary
- Modified Grassland
- Bare Ground
- Fence
- Building
- Hardstanding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Scale: NTS
Checked: CMB
Approved: JP
Copyright - Greenspace Ecological Solutions
No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site. All measurements are for indicative purposes only.

Appendices

APPENDIX A – Small Sites Metric (Statutory Biodiversity Metric) Full Results

Site Name	Enter site name on 2. Site Details
Sheet Name	Headline Results

Headline Results

Headline	BNG Targets Met ✓
Trading Rules	Trading Rules Satisfied ✓
Next steps	Check for input errors/rule breaks present in the metric ⚠

Baseline Units	*Habitat units*	0.4604	
	Hedgerow units	Zero Units Baseline	
	Watercourse units	Zero Units Baseline	
Post-development Units	*Habitat units*	0.5359	
	Hedgerow units	0.0000	
	Watercourse units	0.0000	
Total net unit change	*Habitat units*	0.0755	✓
	Hedgerow units	0.0000	
	Watercourse units	0.0000	
Total net % change	*Habitat units*	16.41%	✓
	Hedgerow units	% target not appropriate	
	Watercourse units	% target not appropriate	

Habitats units required to meet target	0.0000
Hedgerow units required to meet target	0.0000
Watercourse units required to meet target	0.0000

Site Name	Community Diagnostics Centre (CDC), Queen Mary's Hospital (QMH)
Sheet Name	5. Area Habitats

Instructions:

1. Enter data into 1a. Baseline habitats table
2. Enter data on habitats to be created into 1b. Habitats to be created
3. Enter data on habitats to be enhanced into 1c. Habitats to be enhanced
4. Enter data on individual trees into 1d. Tree area calculator

All Key Rules Satisfied ✓

Retained Units	0.0000
Lost Units	0.3176
Created Units	0.2258
Enhancement Units	0.3102
Net Change	0.0755

1a. Baseline habitats

Ref	Habitat		C. Strategic significance	Areas (m^2)			Baseline results			Comments	
	A. Broad Habitat	B. Habitat type		D. Total Area	E. Area retained	F. Area enhanced	Total habitat units onsite	Area Lost	Units lost	User comments	LPA comments
1	Grassland	Modified grassland	Area/compensation not in local strategy/ no local strategy	357.00		357.00	0.14	0.00	0.000	Modified grassland present in the form of a bank which runs along the east, south and west boundaries of the Site. The entirety of this habitat is to be enhanced to other neutral grassland.	
2	Urban	Bare ground	Area/compensation not in local strategy/ no local strategy	794.00			0.32	794.00	0.318	The dominant habitat across the site. To be lost entirely to the proposed development.	
3	Urban	Developed land; sealed surface	Area/compensation not in local strategy/ no local strategy	126.00	126.00		0.00	0.00	0.000	Comprises the existing building to be extended as part of the proposals as well as an existing access path and a small portion of the road which runs parallel to the eastern boundary of the Site. To be retained in its entirety.	
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Trees	Individual trees	Urban/rural tree	Formally identified in local strategy	0.00	0.00		0.0000	0.00	0.0000		
			Totals (areas excl trees, green walls and intertidal hard structures)	1277.00	126.00	357.00	0.4604	794.00	0.3176		
			Error Check 1	Areas Acceptable ✓							
			Error Check 2	Areas Acceptable ✓							
			Error Check 3	Areas Acceptable ✓							

1b. Habitats to be created

Ref	A. Broad Habitat	B. Habitat type	Condition Assessment: Acceptable condition options	Condition Assessment: C. Targeted condition	D. Strategic significance	E. Total Area (m^2)	Habitat units created onsite	Comments: User comments	Comments: LPA comments
1	Grassland	Other neutral grassland	Moderate, Good	Good	Area/compensation not in local strategy/ no local strategy	214.00	0.1798	214m2 of other neutral grassland creation. The target condition for this habitat is 'good'.	
2	Urban	Other green roof	Condition Assessment N/A	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	238.00	0.0459	Sedum roof to be installed on the proposed extension to the existing hospital building. The Bauder XF301 is a sedum roof and, due to its species diversity, therefore qualifies as an 'other green roof'.	
3	Urban	Developed land; sealed surface	N/A - Other	N/A - Other	Area/compensation not in local strategy/ no local strategy	342.00	0.0000	This habitat includes the proposed extension to the existing hospital building, the new plant area, all associated pathways and access routes, and the small portion of road which runs parallel to the western boundary of the Site.	
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Trees	Individual trees	Urban/rural tree	Moderate	Moderate	Area/compensation not in local strategy/ no local strategy	0.00	0.0000		
					Totals (areas excl trees, green walls and intertidal hard structures)	794.00	0.2258		
					Error Check 4	Areas Acceptable ✓			

1c. Habitats to be enhanced

Baseline ref	Existing Habitat Type		Enhanced Habitat type		B. Strategic significance	Area Enhanced	Enhanced Condition	Total Units	Net Improvement	Comments	
	Broad habitat type	Existing habitat type	Enhancement Type	A. Enhanced habitat type						User comments	LPA comments
1	Grassland	Modified grassland	Distinctiveness	Other neutral grassland	Area/compensation not in local strategy/ no local strategy	357.00	Good	0.3102	0.1674	This habitat will be created through oversowing the existing modified grassland with a wildflower-only seed mix containing yellow rattle to suppress vigorous grasses.	
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					Totals (areas excl trees, green walls and intertidal hard structures)	357.00		0.3102	0.1674		

1e . Trading Summary

Broad Habitat Type - Medium Distinctiveness Habitats	Trading Rules Satisfied ✓
Medium and Low Distinctiveness Band	Trading Rules Satisfied ✓