



BIODIVERSITY NET GAIN - TRADING RULES COMPLIANCE TECHNICAL NOTE: 9.20

DECARBONISATION

Cory Decarbonisation Project

PINS Reference: EN010128

JANUARY 2025

Revision A

QUALITY CONTROL

Document Reference		9.20			
Document Owner		Cory Environmental Holdings Limited			
Revision	Date	Comments	Author	Check	Approver
Revision A	January 2025	-	PJ	SH	JW

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1. INTRODUCTION

- 1.1.1. As part of the application for development consent for the Cory Decarbonisation Project (hereafter referred to as the Proposed Scheme), WSP UK Ltd has undertaken a Biodiversity Net Gain (BNG) assessment of the Proposed Scheme, including landscape design proposals prepared by LDA Design Ltd, aiming to achieve a 10% net gain in biodiversity value (reported as **Appendix 7-1: Biodiversity Net Gain Report** of the **Environmental Statement (Volume 3) (APP-088)**).
- 1.1.2. The Proposed Scheme is a Project of National Significance (PNS) and as such an application for Development Consent has been submitted (March 2024). The Proposed Scheme is therefore not yet subject to the mandatory BNG requirement under the Environment Act 2021 (expected to come into effect for nationally significant infrastructure projects in 2025¹). Nevertheless, the Proposed Scheme aims to achieve 10% BNG.
- 1.1.3. The landscape and ecological design covers both habitat creation and enhancement within the Site at Belvedere and broad proposals for a Biodiversity Net Gain Opportunity Area located approximately 1km to the west, at the former Thamesmead Golf Course (TQ480809). The landscape and ecological design proposals are described in the **Outline Landscape, Biodiversity, Access and Recreation Delivery Strategy (as updated alongside this submission)**.
- 1.1.4. This technical note has been prepared in response to the **Greater London Authority's Written Representations (REP1-072)**. The purpose of this technical note is to determine whether:
- all habitats have direct like-for-like replacement (in terms of habitat type and total habitat area) through landscape proposals or whether substitute habitats have been used in certain cases; and
 - whether trading rules have been complied with for habitats subject to substitution.
- 1.1.5. This technical note addresses the above points for both onsite (within the Order Limits) and offsite (Biodiversity Net Gain Opportunity Area at former Thamesmead Golf Course) habitat creation and enhancement proposals. It also covers intertidal habitats within the River Thames within the Order Limits and at a currently unconfirmed offsite location.

¹ Defra. (2023). Biodiversity Net Gain Consultation Outcome: Government response and summary of responses – Section 4.3 Nationally Significant Infrastructure Projects (NSIPs). Available at: <https://www.gov.uk/government/consultations/consultation-on-biodiversity-net-gain-regulations-and-implementation/outcome/government-response-and-summary-of-responses><https://www.gov.uk/government/consultations/consultation-on-biodiversity-net-gain-regulations-and-implementation/outcome/government-response-and-summary-of-responses> [Accessed 16th Sept 2024].

2. SUMMARY OF HABITAT CREATION/ENHANCEMENT AND TRADING RULE COMPLIANCE

- 2.1.1. **Table 1** and **Table 2** describe habitat creation and enhancement measures to be undertaken as part of the Proposed Scheme’s landscape and ecological proposals (detailed in the **Outline Landscape, Biodiversity, Access and Recreation Delivery Strategy (as updated alongside this submission)**) to achieve a 10% net gain in biodiversity value, calculated using the Statutory Biodiversity Metric².
- 2.1.2. The tables detail the estimated changes in biodiversity units for both onsite (including those to be lost as part of the Proposed Scheme footprint and those created through landscape proposals) and offsite (in the Biodiversity Net Gain Opportunity Area) habitats, as well as how trading rules associated with the Statutory Biodiversity Metric will be met.
- 2.1.3. Habitat types unaffected by the Proposed Scheme and that are not subject to enhancement (i.e. retained habitats including ponds, introduced shrub, mixed scrub, other woodland broadleaved and other coniferous woodland) are omitted from the tables as there are no trading rules or replacement requirements associated with them. However, these unaffected habitats are included in the metric calculation as part of the baseline.
- 2.1.4. The analysis shows that the total area for five types of habitat will be smaller following completion of the Proposed Scheme (i.e., they are not replaced like-for-like in terms of area):
- Modified grassland (low distinctiveness);
 - Bramble scrub (medium distinctiveness);
 - Open mosaic habitats on previously developed land (high distinctiveness);
 - Floodplain Grazing Marsh (high distinctiveness); and
 - Littoral mud (high distinctiveness).
- 2.1.5. For all other affected habitats, there is a net increase in the area of habitat type following completion of the Proposed Scheme.
- 2.1.6. However, the metric calculation shows that the trading rules with regards to unit changes are satisfied for all habitat types. This has been achieved by designing the mitigation and compensation to meet the trading rules for each habitat type as explained below.
- 2.1.7. All measures described as onsite will be delivered within Work No. 7 Mitigation and Enhancement Area as shown on the **Works Plans (REP2-003)**. All measures

² Defra (2023). Guidance – Statutory biodiversity metric tools and guides. Available at: https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides?fbclid=IwAR3t_S8djN97HZzb8H9ISdfVqDiUZJcSR7pp4Kz5zHRFK5KWoljPBImRcw [Accessed January 2024].

described as offsite will be delivered within the Biodiversity Net Gain Opportunity Area (former Thamesmead Golf Course) unless otherwise stated.

For high distinctiveness habitats:

- Reedbed habitat lost onsite will be compensated for through creation of new reedbed onsite and offsite such that there will be a net increase in area of reedbed.
- Open mosaic habitat on previously developed land in poor condition that is lost onsite will be compensated for by creation of a slightly smaller area of this habitat in moderate condition offsite.
- Coastal floodplain grazing marsh lost onsite will be compensated for through both creating a smaller area of this habitat type onsite and through enhancing the condition of retained areas of this habitat onsite.
- Littoral mud lost onsite will be compensated for by enhancement of existing littoral mud offsite (location currently unconfirmed).

For medium distinctiveness habitats:

- Other neutral grassland lost onsite will be compensated for through enhancement of a small area of this habitat retained onsite and creation of a large area of this same habitat onsite such that there will be a net increase in area of this habitat onsite.
- Bramble scrub lost onsite will be compensated for by trading up, through retention and enhancement of existing lowland mixed deciduous woodland and creation of an additional area of lowland mixed deciduous woodland onsite, together with the creation and enhancement of open mosaic habitat and coastal floodplain grazing marsh (as described above). These measures result in an excess of units beyond the like-for-like replacement requirements for those high distinctiveness habitats.
- Ditches lost onsite will be compensated for through enhancement of retained ditches onsite and creation of new onsite ditches, such that there will be a net increase in length of ditch onsite.

For low distinctiveness habitats:

- Modified grassland lost onsite will be compensated for by trading up, through creation of additional areas of other neutral grassland (both onsite and offsite) and enhancement of retained areas.

2.1.8. Full calculation results, including the onsite and offsite baseline habitats and the assumptions and method applied for the calculation, can be viewed in **Appendix 7-1: Biodiversity Net Gain Report of the Environmental Statement (Volume 3) (APP-088)**.

Table 1: Area Habitats

Distinctiveness Group	Habitats in Baseline	Onsite Unit Change (BU) / Net change in area (ha)	Offsite Unit Change (BU) / Net change in area (ha)	Project-wide Unit Change (BU) / Net change in area (ha)	Notes on Net Gain and Trading Rules
Low	Grassland - Modified grassland	-2.23 BU / -1.12 ha	0.00 BU / 0.00 ha	-2.23 BU / -1.12 ha	<p>Fewer biodiversity units in the post development landscape proposals than baseline as a result of the loss of 1.12ha of this habitat.</p> <p>Habitat traded up for other neutral grassland of medium distinctiveness, created and enhanced onsite in compliance with the required action to meet its trading rule ('Same distinctiveness or better habitat required').</p>
Medium	Grassland - Other neutral grassland	5.54 BU / 1.04 ha	21.51 BU / -0.66 ha	27.05 BU / 0.38 ha	<p>More biodiversity units of this habitat in the post development landscape proposals than baseline despite the loss of 0.70ha of baseline habitat onsite. This will be achieved by:</p> <ul style="list-style-type: none"> • Creation of 1.74ha of onsite habitat of moderate condition, resulting in a net gain of 1.04ha onsite. • Enhancement of 0.046ha of onsite habitat from poor to moderate condition.

Distinctiveness Group	Habitats in Baseline	Onsite Unit Change (BU) / Net change in area (ha)	Offsite Unit Change (BU) / Net change in area (ha)	Project-wide Unit Change (BU) / Net change in area (ha)	Notes on Net Gain and Trading Rules
					<ul style="list-style-type: none"> Enhancement of 7.70ha of offsite habitat from poor to moderate condition. <p>This is compliant with the required action to meet the habitat’s trading rule (‘Same broad habitat or a higher distinctiveness habitat required’).</p>
Medium	Heathland and shrub - Bramble scrub	-3.62 BU / -0.91 ha	0.00 BU / 0.00 ha	-3.62 BU / -0.91 ha	<p>Fewer biodiversity units in the post development landscape proposals than baseline as a result of the loss of 0.91ha of this habitat onsite.</p> <p>Habitat traded for the same broad habitat or those of higher distinctiveness created/enhanced onsite (woodland and coastal floodplain grazing marsh) and offsite (mixed scrub). This is compliant with the required action to meet the habitat’s trading rule (‘Same broad habitat or a higher distinctiveness habitat required’).</p>
High	Grassland – Floodplain grazing marsh	10.68 BU / -1.37 ha	0.00 BU / 0.00 ha	10.68 BU / -1.37 ha	<p>More biodiversity units of this habitat in the post development landscape proposals than baseline</p>

Distinctiveness Group	Habitats in Baseline	Onsite Unit Change (BU) / Net change in area (ha)	Offsite Unit Change (BU) / Net change in area (ha)	Project-wide Unit Change (BU) / Net change in area (ha)	Notes on Net Gain and Trading Rules
					<p>despite the baseline loss of 2.04ha onsite and net loss of 1.37ha. This will be achieved by:</p> <ul style="list-style-type: none"> Enhancement of 6.99ha of onsite habitat from poor to moderate condition, and creation of 0.67ha of this habitat in moderate condition onsite. <p>This is compliant with the required action to meet the habitat’s trading rule (‘Same habitat required’).</p>
High	Urban - Open mosaic habitats on previously developed land	-6.48 BU / -0.98 ha	7.07 BU / 0.88 ha	0.59 BU / -0.10 ha	<p>More biodiversity units of this habitat in the post development landscape proposals than baseline despite the loss of 0.98ha onsite. This will be achieved by:</p> <ul style="list-style-type: none"> Creation of 0.88ha of offsite habitat of Moderate condition. <p>This is compliant with the required action to meet the habitat’s trading rule (‘Same habitat required’).</p>
High	Wetland - Reedbeds	-1.51 BU / 0.13 ha	1.51 BU / 0.21 ha	0.00 BU / 0.34 ha	<p>The same amount of biodiversity units of this habitat exists in the post development landscape proposals</p>

Distinctiveness Group	Habitats in Baseline	Onsite Unit Change (BU) / Net change in area (ha)	Offsite Unit Change (BU) / Net change in area (ha)	Project-wide Unit Change (BU) / Net change in area (ha)	Notes on Net Gain and Trading Rules
					<p>than baseline despite the loss of 0.37ha baseline habitat onsite. This will be achieved by:</p> <ul style="list-style-type: none"> • Creation of 0.51ha of onsite habitat of moderate condition. • Creation of 0.21ha of offsite habitat of moderate condition. <p>This is compliant with the required action to meet the habitat’s trading rule (‘Same habitat required’).</p>
High	Woodland and forest - Lowland mixed deciduous woodland	2.21 BU / 0.74 ha	0.00 BU / 0.00 ha	2.21 BU / 0.74 ha	<p>More biodiversity units of this habitat in the post development landscape proposals than baseline, created in order to meet the trading rules for lower distinctiveness habitat (e.g. scrub). There will be no loss of lowland mixed deciduous woodland. The increase in units will be achieved by:</p> <ul style="list-style-type: none"> • Creation of 0.74ha of this habitat onsite in poor condition. • Enhancement of 0.99ha of onsite habitat from poor to moderate condition.

Distinctiveness Group	Habitats in Baseline	Onsite Unit Change (BU) / Net change in area (ha)	Offsite Unit Change (BU) / Net change in area (ha)	Project-wide Unit Change (BU) / Net change in area (ha)	Notes on Net Gain and Trading Rules
					There are no trading rule requirements associated with this habitat in this case as there is no loss of woodland habitat.
High	Intertidal sediment - Littoral mud	-0.01 BU / -0.001 ha	0.20 BU / 0.00 ha	0.19 BU / -0.001 ha	<p>More biodiversity units of this habitat in the post development landscape proposals than baseline despite the loss of <0.01ha onsite. This will be achieved by:</p> <ul style="list-style-type: none"> • Enhancement of 0.05ha of offsite habitat from poor to moderate condition. <p>This is compliant with the required action to meet the habitat’s trading rule (‘Same habitat required’).</p>

Table 2: Watercourse Habitats

Distinctiveness Group	Habitats in Baseline	Onsite Unit Change (BU) / Net change in length (km)	Offsite Unit Change (BU) / Net change in length (km)	Project-wide Unit Change (BU) / Net change in length (km)	Notes on Net Gain and Trading Rules
Medium	Ditches	2.30 BU / 0.90 km	0.00 BU / 0.00 km	2.30 BU / 0.90 km	<p>More biodiversity units of this habitat in the post development landscape proposals than baseline despite the loss of 0.4km onsite. This will be achieved by:</p> <ul style="list-style-type: none"> • Creation of 1.3km of onsite habitat of poor condition, resulting in a net gain of 0.9km. • Enhancement of 0.2km of onsite habitat from poor to moderate condition. <p>This is compliant with the required action to meet the habitat’s trading rule (‘Same habitat required’).</p>



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