

Appendix G- Ferry Lane path Update

The SODC Ecology Officer has commented:

Some habitats requiring more complex assessment (including Rivers) are not included in the SSM. As per Page 10 of the SSM User Guide, where onsite habitats are not included in the SSM, then the SSM cannot be used, and the full Statutory Biodiversity Metric Calculation Tool (SBMCT) must be used. Unfortunately, the condition of the river (to input into the SBMCT) will also need to be informed by a River Condition Assessment (RCA) survey by an ecologist with the appropriate accreditation (see Page 44 of the SBMCT User Guide).

In summary, a revised BNG assessment, using the SBMCT completed by a suitably qualified ecologist will be required in support of this application.

ACP Environmental Consultants advice:

Following our review of the site and the Biodiversity Net Gain requirements, we would recommend considering whether it is possible to reduce the red line boundary (RLB) so that it is at least 10 m from the top of the bank of the River Thames, or any other watercourse.

This would avoid the watercourse uplift requirement and is likely to be the most cost-effective option. If the watercourse remains within the RLB, you may be required to purchase watercourse units off-site to meet the relevant requirements. By way of an indication, July 2026 pricing reports indicate that a single watercourse unit is currently close to £128,000, compared with approximately £29,000 for a single tree unit.

If the RLB can be reduced to exclude the riparian zone of the Thames and the resulting RLB is less than 0.2 ha, we would also suggest considering whether it would be beneficial to withdraw the current application and resubmit it in order to potentially benefit from the 0.2 ha exemption.

Please note that the 0.2 ha exemption would only apply where the RLB is more than 10 m from the top of the bank of the watercourse.

We would therefore recommend discussing with your planning team whether the RLB can be amended to achieve this before progressing further, as this could significantly reduce the BNG requirements and associated costs.

Greenford advice:

We are, as you know, 100% certain these proposed works do not need a planning application.

A short low cost meeting with a planning consultant is likely to be at a lesser cost than your attempting to jump through the ever changing hoops presented by SODC.