



TUNLEY  
ENVIRONMENTAL

# REPORT

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# **BIODIVERSITY NET GAIN ASSESSMENT REPORT**

**FOR**

**The Edinboro Castle, 57  
Mornington Terrace, Camden, NW1  
7RU**

**in collaboration with**



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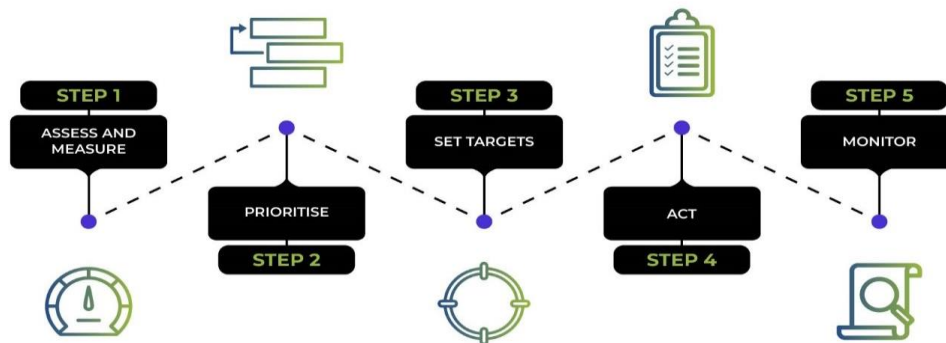
## Nomenclature

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. Areas with high biodiversity are typically found in the tropics which have a huge variety and abundance of life; however, these areas are increasingly affected by both industry and climate change, lowering their biodiversity.
Biodiversity Credits/Offsetting	Biodiversity credits are tradable units representing quantifiable contributions to biodiversity conservation or restoration. Developers or projects with unavoidable negative impacts on biodiversity can purchase these credits to offset their ecological footprint. Biodiversity credits provide a market-based approach to achieving Biodiversity Net Gain, allowing for flexibility in meeting conservation goals.
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 Net Loss	Net loss is the opposite of net gain, indicating a decrease or reduction in a particular quantity or measure, such as biodiversity, habitat, or resources.
Biodiversity Units	A measure to describe the level of biodiversity present on a given site.
Department of Energy, Food, and Rural Affairs	DEFRA is a government department in the United Kingdom responsible for policy and regulations related to the environment, food, agriculture, fisheries, and rural communities.
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.
Ecosystem Restoration	The process of actively assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed. Restoration involves the reinstatement of ecological functionality and can include rehabilitation, reclamation, and rewilding efforts.
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

Nomenclature	Description
	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 Significance	Strategic 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. By considering factors such as ecological connectivity, species interactions, and ecosystem services, we can better comprehend the role and significance of the habitat within its broader context.
Nature Positive	Refers to actions and initiatives that contribute to the conservation and restoration of nature, ensuring a net positive impact on the environment.
Science-Based Targets for Nature (SBTN)	Rigorous framework that uses measurable goals and guidelines for conserving biodiversity, developed using scientific data and analysis.
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 non-residential site is a development which has created floor space of less than 1,000 m <sup>2</sup> or with a total site area of less than 1 hectare. Small sites have a specific statutory metric developed by DEFRA and Natural England which is to be used when sites fall under these guidelines.
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 <sup>2</sup> floor space, or over a hectare for non-residential developments. The statutory biodiversity metric developed by DEFRA and Natural England must be used in this case, and not the small sites metric.

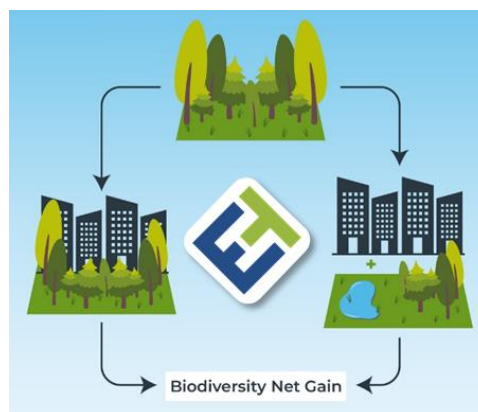
## Methodology and Quantification Standards

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 the 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](#).

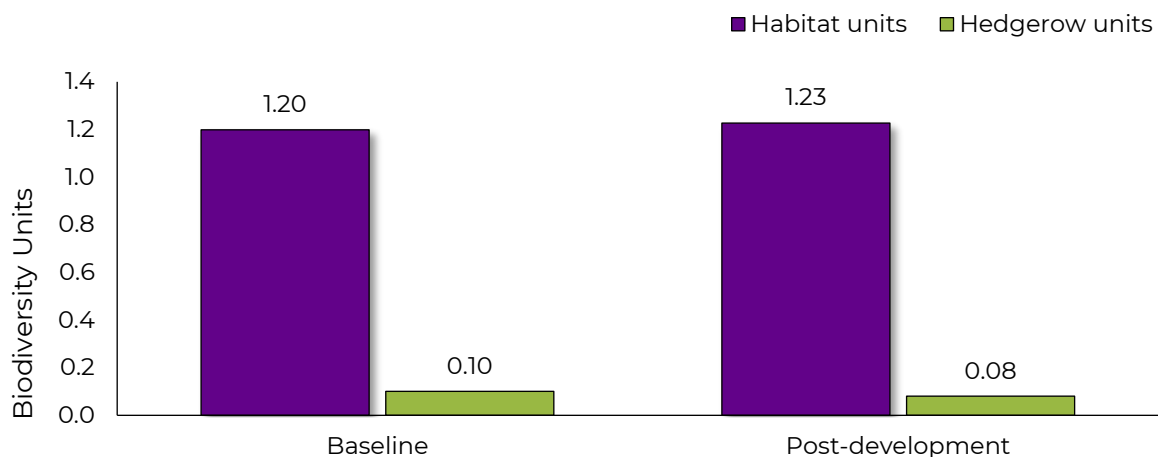
## Executive Summary

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. 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.

Tunley Environmental have conducted an independent assessment to quantify the biodiversity value of the site before and after development to assess biodiversity of the site. Using data provided by JTS Partnership for the Edindoro Castle public house development project, the baseline biodiversity units of the site were calculated to be **1.20 'habitat' biodiversity units and 0.10 'hedgerow' units over an area of 800 m<sup>2</sup>**. This is comprised of 800 m<sup>2</sup> of developed land with a sealed surface and 7 individual trees for 'habitat' units, as well as 25 m of 'native hedgerow' for 'hedgerow' units. Within the proposed development there are plans to create 55 m<sup>2</sup> of 'other green roof', 54 m<sup>2</sup> of 'vegetated garden', 25 m<sup>2</sup> of 'sustainable drainage system', and 10 m<sup>2</sup> of 'ground level planters' within the beer garden area of the Edindoro Castle public house.

Given the fact that the proposed development plans do not impact any onsite priority habitats, impacts less than 25 m<sup>2</sup> of non-zero value onsite habitats, and less than 5 m of onsite linear habitats such as hedgerows. This site therefore classifies under the [de minimis exemption](#) and thus not need to meet the 10% BNG requirement.



**Figure 1.** Total biodiversity units of the site, before and after development by JTS Partnership.



## Introduction

The development project of the Edindoro Castle public house, proposed by JTS partnership, proposes to refurbish the public house as well as the large beer garden area to the rear of the property. The particular site in question, which is 800 m<sup>2</sup> in size, is situated at 57 Mornington Terrace, Camden, NW1 7RU, England. Here Tunley Environmental assess whether the proposed development plans by JTS Partnership and Mitchells & Butlers Retail Limited falls under the national requirement to achieve 10% Biodiversity Net Gain (BNG) post development for planning permission.

According to the UK government a small development is defines as a residential development where the number of dwellings is between 1 and 9 on a site area of ≤ 1 hectare, or if an unknown number of dwellings, the site area is less than 0.5 hectares. As for commercial development, where floor space created is less than 1,000 square metres or the total site area is less than 1 hectare. The proposed site, planned for commercial development, has a total site area 800 m<sup>2</sup>. Accordingly, this project classifies as a small site development project.

The proposed development plans to refurbish the beer garden area of Edinboro Castle do not impact any onsite priority habitats, impacts less than 25 m<sup>2</sup> of non-zero value onsite habitats, and less than 5 m of onsite linear habitats such as hedgerows. Accordingly, the proposed site classifies under the [de minimis exemption](#) and thus not need to meet the 10% BNG requirement.

Tunley Environmental has conducted an independent small site Biodiversity Net Gain (BNG) assessment to identify and quantify the biodiversity of the site before and after the development. This BNG assessment calculates the biodiversity value of the land by evaluating the number of habitats present, the habitat types, size, condition, and location. These data inputs are utilised within the small site's statutory metric, due to the development size, to quantify the biodiversity units present before development. This is the baseline habitats and gives a value for baseline biodiversity units. Below shows the most recent aerial image of the site at the Edinboro Castle site at 57 Mornington Terrace, Camden, NW1 7RU (Figure 2). It is noted that this aerial image may be out of date, and habitats were evaluated from up-to-date images and information provided by JTS Partnership.



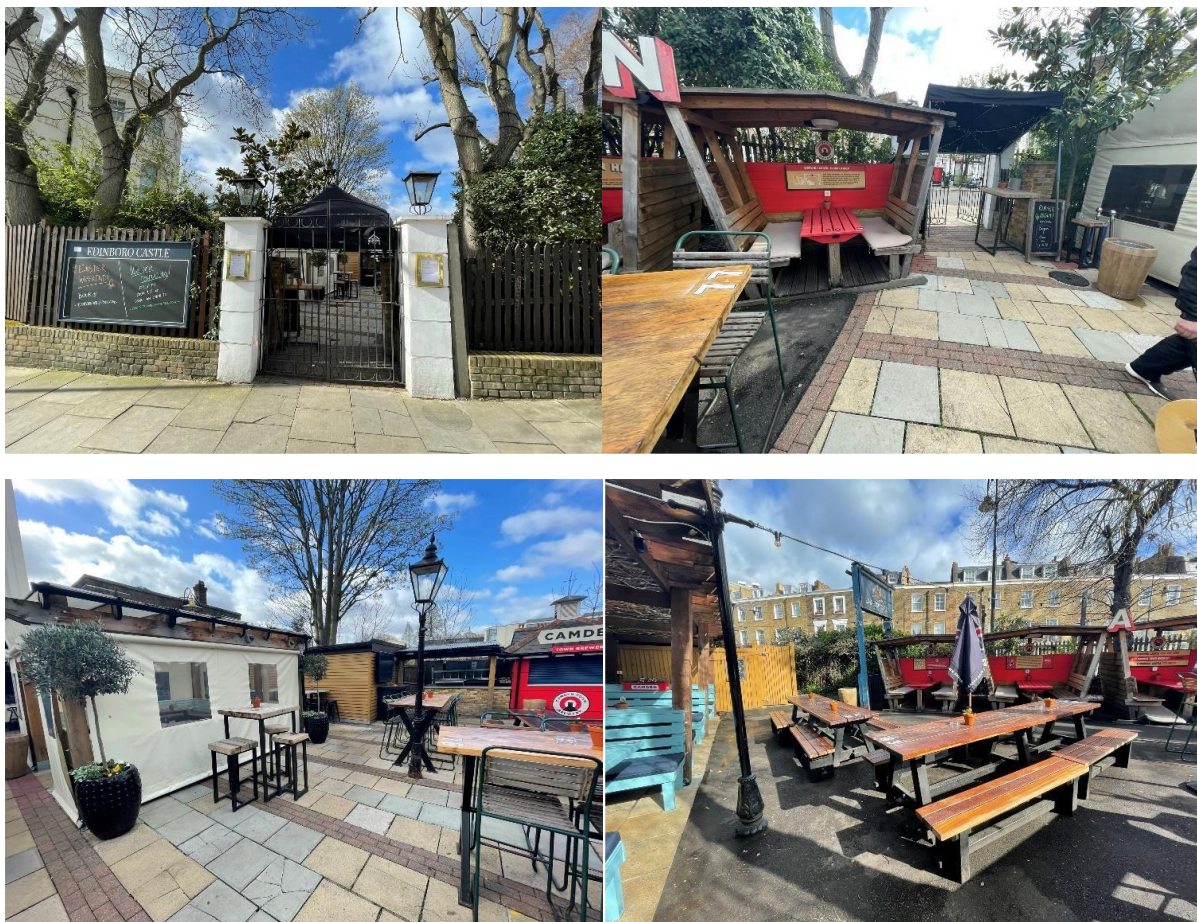
**Figure 2.** Aerial image of the site at 57 Mornington Terrace, Camden, NW1 7RU, England.



## Baseline Results (Pre-development)

Prior to analysing the biodiversity units post development we must conduct a baseline assessment of the site pre-development. This baseline assessment is conducted to determine the existing biodiversity on the project site. This assessment establishes the current state of habitats, species, and ecosystem functions.

The baseline assessment for the Edinboro Castle site was conducted virtually by analysing site photos provided by JTS Partnership to distinguish habitat types as well as implementing Google Earth to accurately analyse the site plans provided alongside property dimensions to yield overall meters of the project site by habitat type. Some example images are shown in Figure 3. Additional information provided by JTS Partnership, which included a tree survey at the site pre-development, allowed for an accurate assessment of the biodiversity units present at baseline.



**Figure 3.** Example images provided to Tunley by JTS Partnership of the site.

For the proposed site for development, 'area habitats' and 'hedges and lines of trees' biodiversity units were identified pre-development. A map of the habitats identified from these images is overlaid into the arial image above in Figure 4.



**Figure 4.** Aerial view separated by different habitat types identified on site pre-development.

The [UK habitat classification \(UKHab\)](#) system is utilised to define habitats inputted within the metric (see Table 1 and Appendix). The ‘habitat types’ identified on-site for this project pre-development include 800 m<sup>2</sup> of ‘developed land; sealed surface’ as well as 7 individual trees making up 1302 m<sup>2</sup> of ‘urban tree’ area (Figure 4). These making up 38.1% and 61.9% respectively of the total area habitats present onsite pre-development. As for ‘hedges and lines of trees’, we identified 25 m of ‘native hedgerow’ on-site pre-development. Japanese knotweed was also identified on-site pre-development. However, this is planned for removal before development, due to it being an [invasive species in the UK](#).

**Table 1.** Explanation of baseline habitat types, habitat characteristics, and habitat area/length.

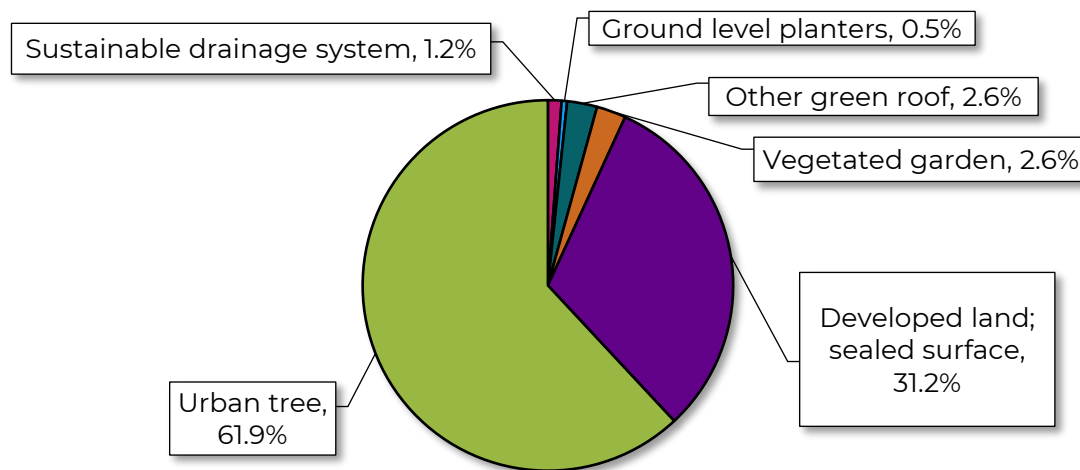
Habitat Type	Habitat Characteristics	Habitat Area or Length	Unit	Biodiversity Units
<b>Developed land; sealed surface</b>	Classifies under the <b>‘Urban’</b> broad habitat and is defined as soil surface sealed with impervious materials as a result of urban development and infrastructure construction.	800	m <sup>2</sup>	0.00
<b>Urban Trees</b>	Classifies under the <b>‘Individual Trees’</b> broad habitat and is defined as forest phanerophyte at any stage of growth, e.g. Oak <i>Quercus spp.</i> but not Hawthorn <i>Crataegus monogyna</i> .	1302	m <sup>2</sup>	1.20
<b>Native Hedgerow</b>	Classifies under the <b>‘Hedgerows and Lines of Trees’</b> broad habitat and is defined as hedgerow with >80% canopy cover of UK native or archaeophyte woody species.	25	m	0.10







Post-development the greatest portion of the site remains the 1302 m<sup>2</sup> of 'urban trees' (61.9%), followed by 656 m<sup>2</sup> of 'developed land; sealed surface' (Table 2). These making up 61.9% and 31.2 % of the total area habitats present onsite post-development (Figure 7). Of the 144 m<sup>2</sup> 'developed land; sealed surface' area habitat (zero biodiversity units) and 4 m of 'native hedgerow' that will be lost during development, JTS Partnership plans to create a variety of different area 'habitats' in its stead. These include 55 m<sup>2</sup> of 'other green roof', 54 m<sup>2</sup> of 'vegetated garden', 25 m<sup>2</sup> of 'sustainable drainage system', and 10 m<sup>2</sup> of 'ground level planters' (Figure 7).



**Figure 7.** Percentage contribution of habitat types by area post-development if initiatives are taken.

As we find that the proposed development plans for the refurbishment of the beer garden area do not impact on any onsite priority habitats, as well as have no impact on the 7 individual trees present on-site, impacts less than 5 m of the onsite 'native hedgerow', and only impact the total area of 'developed land; sealed surface', this having zero biodiversity units. We find that the proposed site for development classifies under the [de minimis exemption](#) and therefore does not need to meet the national requirement to achieve 10% Biodiversity Net Gain (BNG) post development for planning permission.

**Table 2.** Explanation of habitat type, habitat characteristics, and habitat area of all habitats to be created post-development.

Habitat Type	Habitat Characteristics	Habitat Area or Length	Unit	Condition	Biodiversity Units
<b>Developed land; sealed surface</b>	Classifies under the ' <b>Urban</b> ' broad habitat and is defined as soil surface sealed with impervious materials as a result of urban development and infrastructure construction.	656	m <sup>2</sup>	N/A - Other	0.00

<b>Urban Trees</b>	Classifies under the <b>'Individual Trees'</b> broad habitat and is defined as forest phanerophyte at any stage of growth, e.g. Oak <i>Quercus spp.</i> but not Hawthorn <i>Crataegus monogyna</i> .	1302	m <sup>2</sup>	Moderate	1.20
<b>Native Hedgerow</b>	Classifies under the <b>'Hedgerows and Lines of Trees'</b> broad habitat and is defined as hedgerow with >80% canopy cover of UK native or archaeophyte woody species.	21	m	Moderate	0.08
<b>Other green roof</b>	Classifies under the <b>'Urban'</b> broad habitat and is defined as green roofs, including wildflower turfs and Sedum blankets, that are neither biodiverse nor intensive.	55	m <sup>2</sup>	Condition assessment N/A	0.01
<b>Vegetated garden</b>	Classifies under the <b>'Urban'</b> broad habitat and is defined as a garden that is principally vegetated, for example with large areas of grass and flower beds.	54	m <sup>2</sup>	Condition assessment N/A	0.01
<b>Sustainable drainage system</b>	Classifies under the <b>'Urban'</b> broad habitat and is defined as elements designed to manage surface water to aid in reducing flooding and increasing water quality.	25	m <sup>2</sup>	Moderate	0.01
<b>Ground level planters</b>	Classifies under the <b>'Urban'</b> broad habitat and is defined as plants in pots and other planters at ground level.	10	m <sup>2</sup>	Condition assessment N/A	0.00

## Conclusion

Following a baseline assessment of the biodiversity units present onsite and the proposed development plans by JTS Partnership and Mitchells & Butlers Retail Limited for the Edindoro Castle public house and beer garden site. We find that the proposed development classifies under the [de minimis exemption](#), due to it impacting less than 25 m<sup>2</sup> of onsite 'habitat' area with a biodiversity value greater than zero and less than 5 m of onsite linear 'hedgerow' areas. Therefore, even though JTS Partnership have incorporated BNG initiatives into their development plan, the proposed beer garden site for refurbishment does not need to meet the national requirement to achieve 10% Biodiversity Net Gain (BNG) post development for planning permission.

BNG approaches offer a pathway to not only safeguard the intricate web of life on Earth but also to preserve the essential ecosystem services that underpin the global economy and human prosperity. As the urgency of addressing biodiversity loss intensifies, a comprehensive strategy that integrates conservation, sustainable development, and restoration efforts is essential to ensure a resilient and biodiverse future for the planet.

# Appendix

## 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.

Baseline habitats										
Ref	Habitat		C. Strategic significance	Areas (m <sup>2</sup> )			Baseline results			
	A. Broad Habitat	B. Habitat type		D. Total Area	E. Area retained	F. Area enhanced	Total habitat units onsite	Area Lost	Units lost	
1	Urban	Developed land, sealed surface	Area/compensation not in local strategy/ no local strategy	800.00	656.00		0.00	144.00	0.000	
2										
3										
4										
5										
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12										
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16										
17										
18										
19										
20										
Trees	Individual trees	Urban/rural tree	Formally identified in local strategy	1302.22	1302.22		1.1980	0.00	0.0000	
				<b>Totals (areas excl trees, green walls and intertidal hard structures)</b>	800.00	656.00	0.00	1.1980	144.00	0.0000
				Error Check 1	Areas Acceptable ✓					
				Error Check 2	Areas Acceptable ✓					
				Error Check 3	Areas Acceptable ✓					

Habitats to be created							
Ref	A. Broad Habitat	B. Habitat type	Condition Assessment		D. Strategic significance	E. Total Area (m <sup>2</sup> )	Habitat units created onsite
			Acceptable condition options	C. Targeted condition			
1	Urban	Sustainable drainage system	Moderate, Good	Moderate	Area/compensation not in local strategy/ no local strategy	25.00	0.0060
2	Urban	Ground level planters	Condition Assessment N/A	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	10.00	0.0019
3	Urban	Other green roof	Condition Assessment N/A	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	55.00	0.0106
4	Urban	Vegetated garden	Condition Assessment N/A	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	54.00	0.0104
5							
6							
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12							
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16							
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18							
19							
20							
Trees	Individual trees	Urban/rural tree	Moderate	Moderate	Area/compensation not in local strategy/ no local strategy	0.00	0.0000
				<b>Totals (areas excl trees, green walls and intertidal hard structures)</b>		144.00	0.0290
				Error Check 4	Areas Acceptable ✓		



## 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](#). Below are excerpts from the UK Hab classification version 2 for all relevant habitat types.



### Code and Name

**u1b** Developed land – sealed surface

### Category Type

Primary Level 4

### Spatial Feature Type

Area Line Point

### Inclusions

Sealed surfaces with vegetation cover of <10% or any cover in the case of green roofs.

[Back to Urban Ecosystem](#)

### Definition

Soil surface sealed with impervious materials as a result of urban development and infrastructure construction.



### Code and Name

**200** Tree

### Category Type

Additional Secondary Codes - Woodlands and Trees

### Spatial Feature Type

Point

### Allowable Primary Codes

g~ w~ h~ f~ c~ u~ s~ r~

### Definition

Forest phanerophyte at any stage of growth, e.g. Oak *Quercus* spp. or Ash *Fraxinus excelsior* but not Hawthorn *Crataegus monogyna* or Hazel *Corylus avellana*.

[Back to Additional Secondary Code List](#)

## h2a Native hedgerow

### Category Type

Primary Level 4

### Spatial Feature Type

Line

### Status

Priority Habitat

### Definition

A hedgerow with >80% canopy cover of UK native or archaeophyte woody species.

### Inclusions

Archaeophytes are species that have been recorded as naturalised in the wild before 1500 CE. The status of Sycamore *Acer pseudoplatanus* is unclear, but it should be treated as an archaeophyte.

Roses *Rosa spp.* are included as woody species.

### Exclusions

Climbers such as Honeysuckle *Lonicera periclymenum* and Bramble *Rubus fruticosus agg.* are recognised as integral to many hedgerows; however they require other woody plants to be present to form a distinct woody boundary feature, and as such they are not included in the definition of woody species.

### Species

Often a mix of shrub and tree species such as Hawthorn *Crataegus monogyna*, Blackthorn *Prunus spinosa*, Hazel *Corylus avellana*, Field Maple *Acer campestre*, Elm *Ulmus spp.*, Ash *Fraxinus excelsior* and Oak *Quercus spp.*, interwoven with climbers like Traveller's-joy *Clematis vitalba* and Honeysuckle *Lonicera periclymenum*.

The ground flora is often very similar to local woodlands.



### Code and Name

## 89 Other green roof

### Category Type

Essential Secondary Codes - Built environment

### Spatial Feature Type

Area Point

### Allowable Primary Codes

u1b5

### Definition

Green roofs, including wildflower turfs and Sedum blankets, that are neither biodiverse nor intensive.

### Landscape and ecological context

Wildflower turfs support a range of wildflower species but lack the topography and diversity of biodiverse green roofs. They may need regular irrigation.

Sedum blanket systems should be a minimum depth of 80mm.

[Back to Essential Secondary Code List](#)



**Code and Name**

**828 Vegetated garden**

**Category Type**

Additional Secondary Codes - Built environment

**Spatial Feature Type**

Area

**Allowable Primary Codes**

g~ w~ h~ f~ u~ s~ r~

**Definition**

Garden that is principally vegetated, for example with large areas of grass and flower beds.

[Back to Additional Secondary Code](#)

[List](#)



**Code and Name**

**848 Sustainable drainage system**

**Category Type**

Additional Secondary Codes - Built environment

**Spatial Feature Type**

Area Point

**Allowable Primary Codes**

g~ f~ s~

**Definition**

Elements designed to manage surface water to aid in reducing flooding and increasing water quality.

[Back to Additional Secondary Code](#)

[List](#)



**Code and Name**

**845 Ground level planters**

**Category Type**

Additional Secondary Codes - Built environment

**Spatial Feature Type**

Area Point

**Allowable Primary Codes**

u1~

**Definition**

Plants in pots or other planters at ground level.

[Back to Additional Secondary Code](#)

[List](#)





## Approval

Author:	Nora von Xylander (MSc, PhD pending)
Position:	Biodiversity and Sustainability Scientist
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QA approved by:	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Revision: [CODE] Dr Aaron Yearley Meng, PhD, AMIChemE
Position:	Science Team Co-Lead
Approval date:	22 <sup>nd</sup> May 2024
Reference:	JTS_Partnership_BNG_24-A
Revision:	A

Revision History:	Change Description:	Changed by:	Date:	Approved by:	Date:
B					
C					
D					
E					
F					

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