Pell Frischmann

Finchley Road: Temporary Carpark Application

Biodiversity Net Gain Assessment

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Executive Summary	
Site Name	Finchley Road: Temporary Carpark Application
Location and Proposed Development	The Site is located in Finchley, within the London Borough of Camden (LBC). It is bounded by Blackburn Road, which envelops the Site along its southern and northern edge. The Thameslink Bedford-Brighton railway line runs along the northern edge of the Site, and the London Underground Jubilee and Metropolitan lines run above ground along the southern edge of the Site.
Biodiversity Net Gain	This BNG assessment has been completed to quantify the baseline value and overall effect of the Proposed Development on biodiversity within the Site. The BNG assessment has followed industry best practice methodologies and legislation using the Statutory Biodiversity Metric and the Phase 1 Habitat Map produced as part of the PEA. The Statutory Biodiversity Metric is a tool that can be used to calculate the biodiversity impact of development projects in England. It is used to ensure that development projects achieve a net gain in biodiversity, meaning that they leave the environment in a better state than they found it.
Baseline Habitats	The date of the pre-development BNG units will be the 16th February 2021 when the red line boundary and also the wider site ownership (for the full Finchley Road Masterplan Application) were surveyed. Following confirmation that the baseline has not changed; this baseline date was considered suitable due to the limited urban habitats present. No linear hedgerow or watercourse habitats were present within the Site. In total, the baseline biodiversity value of the area-based habitats present was calculated as 0.82 habitat units and consists of urban trees in 'poor' and 'moderate' condition, introduced shrub and developed land/sealed surface. The trees recorded as part of the baseline (both those being retained those being removed), align with the Tree Protection Plan (ref 104878-PEF-ZZ-XX-DR-GE-400008) which forms Appendix C of the Arboricultural Impact Assessment (104878-PEF-ZZ-XX-RP-GE-400001 P07) that formed part of the extant O2 Masterplan Site planning permission. Notwithstanding that these trees are to be removed under the extant permission they still form part of the baseline for the purposes of the legislation for this new planning application.
Results and Recommendations	The proposed development is calculated at a net loss of 0.44 habitat units leading to a BNG deficit of 54.11%. The proposed development forms a Temporary Planning Application which is anticipated to last 5 to 10 years. Habitat and landscape planting has therefore been excluded from the on-site habitat creation tab as none of the created habitats will reach the 30-year requirement for BNG. Therefore, achieving BNG on Site and creating a 30-year management plan will not be practical. The proposed development can achieve 10% BNG through the off-site options available including either off-site unit purchase or Statutory Credits.

Unit Type	Baseline Units	Post Development Units	Net project biodiversity units (+/-)	Total project biodiversity % Change	Unit Deficit
Habitat units	0.82	0.37	**-0.44**	**-54.11**	**0.52**

1 Introduction

This Biodiversity Net Gain (BNG) Assessment has been prepared by Pell Frischmann (PF) on behalf of LS (Finchley Road) Limited (the Applicant), of Land at Finchley Road (the Site).

This BNG assessment has been completed to quantify the baseline value and overall effect of the Proposed Development on biodiversity within the Site. This has been achieved by comparing the baseline habitat with the Proposed Development value taking into account the level of habitat retention, loss, enhancement and creation using the Statutory Biodiversity Metric. The Statutory Biodiversity Metric[1] has been used in line with the appropriate User Guide[2] and the assessment has also been completed in line with the Best Practice Principles [3].

1.1 Site Location and Description

The Site is located in Finchley, within the London Borough of Camden (LBC). It is bounded by Blackburn Road, which envelops the Site along its southern and northern edge. The Thameslink Bedford-Brighton railway line runs along the northern edge of the Site, and the London Underground Jubilee and Metropolitan lines run above ground along the southern edge of the Site.

1.2 Proposed Development and Context

Planning permission was granted by London Borough of Camden (LBC) on 20 December 2023 for the redevelopment of the O2 Centre Masterplan Site. Within the centre of the Site sits an expansive 520 space car park which services the Homebase (now permanently closed) and the O2 Shopping Centre which is still in operation. Following the emerging and phased masterplan this proposal looks to temporarily address the evolving needs of the Site through;

- Re-configuring the car park to 200 spaces,
- Introducing a new temporary bus turning head,
- Maintaining delivery and servicing to the O2 Centre,
- Facilitating future construction access for Phase 1,
- Introducing a safe and legible east west pedestrian and cycle link.

These above proposals form part of the Temporary Planning Application which is anticipated to last 5 to 10 years.

[1] Statutory biodiversity metric tools and guides https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides
[2] The Statutory Biodiversity Metric User Guide (February 2024) https://assets.publishing.service.gov.uk/media/65c60e0514b83c000ca715f3/The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf
[3] CIEEM, CIRIA & IEMA (2019). Biodiversity Net Gain: Good practice principles for development. A practical guide. https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf

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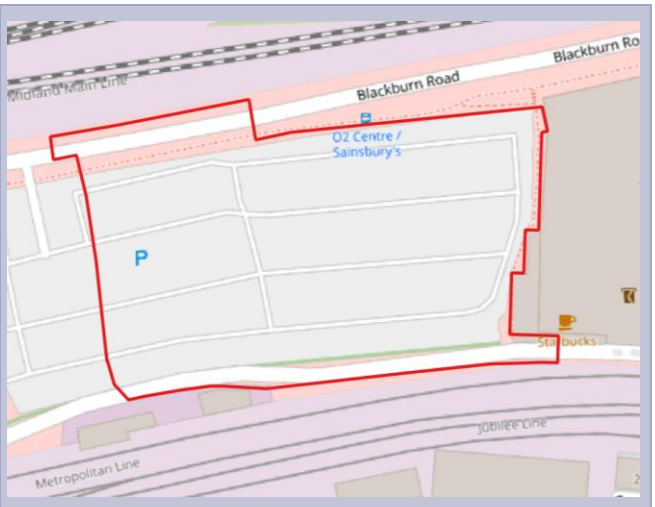

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Figure 1 Site Location Plan

2 Legislation and Policy

2.1 National Legislation

The Environment Act 2021 provides a framework for environmental governance, and in relation to Biodiversity and Nature Conservation, the Act includes targets to halt biodiversity decline by 2030. From 12th February 2024, the Act requires all relevant developments to achieve a minimum 10% BNG under the statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990, inserted by the Environment Act.

2.2 National Planning Policy

The National Planning Policy Framework (NPPF 2023) Paragraphs 180 to 188 set out the Government's policies on conserving and enhancing habitats and biodiversity through the planning system. These policies are expected to be incorporated into development planning documents at regional and local scales and are also of material worth in considering individual planning applications.

Of particular note to BNG is Paragraph 186(d) which states ''*when determining planning applications, local planning authorities should apply the following principles…..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'.*

2.3 Local Planning Policy

2.3.1 Camden Local Plan

The Camden Local Plan was adopted by the council in July 2017 and has replaced the previous Core Strategy and Camden Development Policies. The Local Plan is used as the basis of planning decisions and to inform the future of development within the Borough.

Policy A3 addresses the protection, enhancement and management of biodiversity and states '*the council will protect and enhance sites of nature conservation*'. This is aimed to be carried out through the designation and protection of nature conservation sites, including the safeguarding of habitats and species.

To comply with Policy A3, the Council will '*grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species……assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed*'.

Policy A3 also states that the Council will require the following in relation to trees and vegetation:

- resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation;
- require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction' and positively integrated as part of the site layout;
- expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development; and
- expect developments to incorporate additional trees and vegetation wherever possible.

2.3.2 The London Plan

The London Plan (2021) Chapter 8 covers Green Infrastructure and Natural Environment. In particular the following policies should be considered within this project:

- Policy G6 addresses Biodiversity and Access to Nature and states that Sites of Importance for Nature Conservation (SINCs) should be protected and avoidance measures taken where possible. Policy G6 also states that biodiversity enhancements should be considered from the onset of a development, as well as seeking new or improved habitats that result in a positive gain for biodiversity.
- Policy G7 addresses Trees and Woodlands and states trees should be protected, and where new trees are planted this should be in appropriate locations. Therefore, developments should aim to protect trees where possible and if this is not possible, adequate replacements are required

2.3.3 London Environment Strategy

The London Environment Strategy (2018) focusses on a range of actions to improve the environment across London to create a better future.

Objective 5.2 addresses the aim of Conserving and Enhancing Wildlife and Natural Habitats through Policy 5.2.1 which aims to protect a core network of nature conservation sites and ensure a net gain in biodiversity. This will be done by:

- Proposal 5.2.1.a - the London Plan includes policies on the protection of Sites of Importance for Nature Conservation (SINCs) and Regionally Important Geological Sites (RIGS);
- Proposal 5.2.1.b - the Mayor will develop a biodiversity net gain approach for London, and promote wildlife-friendly landscaping in new developments and regeneration projects;
- Proposal 5.2.1.c - the Mayor will provide guidance and support on the management and creation of priority habitats, the conservation of priority species, and the establishment of wildlife corridors.

3 Assessment Methodology

The BNG assessment has followed industry best practice methodologies and legislation including:

- The Statutory Biodiversity Metric[4] and User Guide (February 2024)[5]; and
- CIEEM, CIRIA & IEMA (2019). Biodiversity Net Gain: Good practice principles for development. A practical guide[6].

The Statutory Biodiversity Metric and Good Practice Principles (CIRIA, CIEEM and IEMA, 2019) combined are used to produce an assessment which:

- Establishes the baseline biodiversity units for area, linear hedgerow and linear river habitats (where applicable) within the Site (and in the case of rivers within 10m of the Site);
- Establishes the number of biodiversity units to be retained and/or created;
- Establishes whether the Proposed Development will result in an overall net loss, no net loss or net gain within the Site boundary;
- Provides evidence of how the proposed development will achieve biodiversity gain within the Proposed Development; and
- Provides recommendations for amendments and updates to the Proposed Development to ensure that BNG can be achieved and implemented.

In addition to the BNG calculations, evidence of the application of the mitigation hierarchy, stakeholder engagement and post-development habitat management has been referenced in Table 3.

3.1 The Statutory Biodiversity Metric

The BNG assessment and calculations have been assessed using the Statutory Biodiversity Metric and the Phase 1 Habitat Map produced as part of the PEA. The Statutory Biodiversity Metric is a tool that can be used to calculate the biodiversity impact of development projects in England. It is used to ensure that development projects achieve a net gain in biodiversity, meaning that they leave the environment in a better state than they found it.

The Statutory Biodiversity Metric provides a way to measure and account for the losses, changes, and gains, in biodiversity as a result of development, or changes in land management, and includes a calculation tool to demonstrate these figures.

Baseline Biodiversity Units

The Statutory Biodiversity Metric has been used to calculate the baseline biodiversity units within the Site. These calculations have then been used to help the scheme follow both the mitigation hierarchy of avoidance, mitigation, and compensation, the Biodiversity Hierarchy of achieving BNG on-site as the first priority and to inform the post development management. Biodiversity units are a function of the elements described below.

Habitat Distinctiveness

Habitat distinctiveness is described as a collective measure of biodiversity and its distinguishing features. The Statutory Biodiversity Metric automatically assigns distinctiveness based on the habitat selected.

[4] Statutory biodiversity metric tools and guides https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides
[5] The Statutory Biodiversity Metric User Guide (February 2024) https://assets.publishing.service.gov.uk/media/65c60e0514b83c000ca715f3/The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf
[6] CIEEM, CIRIA & IEMA (2019). Biodiversity Net Gain: Good practice principles for development. A practical guide. https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf

Habitat Condition

Habitat condition is a measure of the state of a habitat and is used to measure variation between parcels of the same habitat type and is measured in accordance with the assessment methodology set out by The Statutory Biodiversity Metric Condition Assessment Sheets and Methodology[7]. To determine the habitat condition, the habitat is subject to a field survey and assessed against a number of criteria as set out for each habitat type.

Strategic Significance

Strategic significance is the local significance of the habitat based on its location and habitat type. Where published, the relevant published Local Nature Recovery Strategy (LNRS) should be used to assign strategic significance. If an LNRS has not yet been published, the planning authority should specify alternative suitable documents to be used. Descriptions are set out further in the User Guide to inform this assessment.

Post Development Biodiversity Units

The metric is then used to calculate the biodiversity units present in the post development proposal. Where the number of biodiversity units is lower/higher than the baseline calculations, an assessment can be made as to whether the scheme will achieve a net gain or a net loss for biodiversity.

Calculations of biodiversity units remaining following the construction of the proposed development take account of:

- Habitat that is lost due to development;
- Habitat retained post development;
- Retained and enhanced habitats; and
- Habitats created due to the development.

Post construction assessment is based upon the target state (size and condition) for the habitats that are being enhanced or created.

3.2 Baseline Surveys and Data Sources

The Preliminary Ecological Appraisal (PEA) (ref 104878-PEF-ZZ-XX-RP-GE-400000 P07) and Arboricultural Impact Assessment (104878-PEF-ZZ-XX-RP-GE-400001 P07) was undertaken by Pell Frischmann in February 2021 to determine the baseline habitats within the wider Site as part of the Finchley Road Masterplan scheme.

The Phase 1 Habitat Survey map, Tree Constraints Plan and Tree Survey Schedule were used to measure the baseline biodiversity units within the Site. The habitats identified and mapped were also subject to a habitat condition assessment to enable them to be categorised in line with the methodology described above.

3.2.1 Strategic Significance

As part of this assessment the following have been reviewed to assign the strategic significance of the habitats:

- Camden Local Plan Policy A3.

The strategic significance has been outlined in Section 4

3.3 Post Development Plans and Data Sources

The Landscape GA Plan (LNS-O2_HTA-L_XX-00_DR_2900) has been used to assess the post-development biodiversity units and to determine whether the Proposed Development will be able to achieve BNG on

[7] The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology (February 2024) - https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides

completion. Should the proposed plans be revised from the drawing used as the basis for this assessment, an ecologist must review these recommendations and update them appropriately.

For the purposes of this BNG assessment and report, the Landscape GA Plan was converted to UKHab Classification using the Metric 'Phase 1 – metric habitat translation tool' to inform the metric.

3.4 Biodiversity Net Gain Principles

The BNG calculations provide only a quantitative assessment and therefore further principles should also be considered including the application of the mitigation hierarchy, engagement with stakeholders, avoidance of irreplaceable habitats, and overall achieving the best possible outcomes for biodiversity.

These 10 principles are discussed further below in Table 3 with evidence and outcomes of each principle from the proposed development to provide a qualitative summary of BNG.

3.5 Assumptions

The following assumptions apply to the assessment:

- The BNG assessment is only a singular method of assessing the impact of the proposed development. The BNG report does not cover requirements of the proposed development to mitigate potential impacts on protected species and designated sites of importance to nature conservation. These have been captured within the PEA (ref 104878-PEF-ZZ-XX-RP-GE-400000 P07) and Arboricultural Impact Assessment (104878-PEF-ZZ-XX-RP-GE-400001 P07) as listed in Section 3.2 above.
- In line with Statutory biodiversity metric: user guide, BNG units are split into Area Units, Linear Hedgerow Units and Linear River Units. These units are not interchangeable, and one area unit is not equal to one linear unit; therefore, the gain of one cannot offset the loss of the other and units cannot be combined, traded or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit. No linear hedgerow or watercourse habitats are present within the Site and therefore they have been excluded from the BNG Assessment.
- At the time of this report, the conclusions and recommendations have been made based on Landscape GA Plan (LNS-O2_HTA-L_XX-00_DR_2900). In the event that this drawing changes, the BNG calculations will need to be updated by a person suitably qualified to do so.

3.6 Constraints and Limitations

The following constraints and limitations apply to the assessment:

- All habitat areas and lengths have been measured manually using QGIS based on the Phase 1 Habitat Map and the Landscape GA Plan (LNS-O2_HTA-L_XX-00_DR_2900), as such habitat areas have been measured as accurately as possible.
- The date of the pre-development BNG units will be the 16th February 2021 when the red line boundary and also the wider site ownership (for the full Finchley Road Masterplan Application) were surveyed. Following confirmation that the baseline has not changed; this baseline date was considered suitable due to the limited urban habitats present.

4 Baseline Habitats

The baseline (pre-development) habitats recorded within the Site during the Phase 1 Habitat and AIA surveys are described below. No linear hedgerow or watercourse habitats are present within the Site.

The trees recorded as part of the baseline (both those being retained those being removed), align with the Tree Protection Plan (ref 104878-PEF-ZZ-XX-DR-GE-400008) which forms Appendix C of the Arboricultural Impact Assessment (104878-PEF-ZZ-XX-RP-GE-400001 P07) that formed part of the extant O2 Masterplan Site planning permission. Notwithstanding that these trees are to be removed under the extant permission they still form part of the baseline for the purposes of the legislation for this new planning application.

In total, the baseline biodiversity value of the area-based habitats present was calculated as 0.82 habitat units.

The Site baseline consists of:

- Forty urban trees in ‘poor’ condition;
- Three urban trees in ‘moderate’ condition;
- 0.0338ha introduced shrub (condition n/a); and
- 0.9382ha developed land/sealed surface (condition n/a).

Strategic significance was applied to habitats as follows:

- Strategic significance has been set based on the Camden Local Plan as no Local Nature Recovery Strategy (LNRS) for London as yet been published.
- Camden Local Plan Policy A3 incudes trees and vegetation specific areas mapped out do not include the O2 Finchley Road Site and tree compensation and protection focuses on ‘*trees and vegetation of significant amenity, historic, cultural or ecological value*’. Therefore a 'low' strategic significance has been applied.
- Introduced shrub and developed surface have been identified as ‘low’ strategic significance.

Table 1 Summary of on-Site Baseline Habitat Types – Area Habitats

Habitat Type	Area (hectares)	Distinctiveness	Condition	Baseline Area Units	Strategic Significance
Individual trees	0.1629	Medium	Poor	0.65	Low
Individual trees	0.0122	Medium	Moderate	0.10	Low
Introduced shrub	0.0338	Low	N/A	0.07	Low
Developed land; sealed surface	0.9382	Very low	N/A	0.00	Low
Total[8]				**0.82**	

[8] Note numbers taken directly from the Statutory Biodiversity Metric so rounding errors may occur

5 Post-Development Habitats

5.1 Habitats to be Retained

The habitats to be **retained**, in full or in part, in their current state during the development on site include:

- 21 urban trees (poor condition); and
- 1 urban tree (moderate condition)

This will be achieved through:

- Tree protection fencing during the construction phase.

5.2 Habitats to be Enhanced

No areas of habitat are to be **enhanced** on site.

5.3 New Habitats to be Created

Habitats to be **created** on site will consist of:

- New tree planting;
- Shrub and ornamental planting; and
- Swales.

However, given the temporary nature of the proposed scheme, these habitats have not been counted towards the total BNG score as they will not be retained and managed for 30 years. Therefore, while the creation of these habitats form a mitigation for the loss of biodiversity from the Site during the project lifespan, they have been included within 'developed land' in the metric to achieve a score of 0.0 biodiversity units.

6 Results and Recommendations

6.1 Discussion of Results

The proposed development is calculated at a net loss of 0.44 habitat units leading to a BNG deficit of 54.11%.

The proposed development forms a Temporary Planning Application which is anticipated to last 5 to 10 years. Habitat and landscape planting has therefore been excluded from the on-site habitat creation tab as none of the created habitats will reach the 30-year requirement for BNG.

Therefore, achieving BNG on Site and creating a 30-year management plan will not be practical.

For this reason, the proposed scheme will utilise the following:

- Off-site unit purchase: to discharge the deemed planning condition, the scheme will purchase offsite units from a registered habitat bank.
- Statutory Credits: in the even that a habitat bank is unable to provide the suitable units, Statutory Credits will be purchased. This will be a last resort option as set out within the legislation and only used if absolutely necessary.

The proposed development can achieve 10% BNG through the off-site options available.

6.2 Trading Rules

The metric sets the minimum habitat creation and enhancement requirements up to 'no-net loss' and are based on habitat type and distinctiveness. Table 3 of the User Guide sets out the trading rules and these will be met through the purchase of off-site units or Statutory Credits.

Table 2 Summary of Biodiversity Units

Unit Type	Baseline Units	Post Development Units	Net project biodiversity units (+/-)	Total project biodiversity % Change	Unit Deficit
Habitat units	0.82	0.37	**-0.44**	**-54.11**	**0.52**

6.3 Biodiversity Net Gain Principles

The BNG calculations provide only a quantitative assessment and therefore further principles should also be considered including the application of the mitigation hierarchy, engagement with stakeholders, avoidance of irreplaceable habitats, and overall achieving the best possible outcomes for biodiversity.

These 10 principles are discussed further below in Table 3 with evidence and outcomes of each principle from the proposed development.

Table 3 Qualitative Discussion of Biodiversity Net Gain Principles

Principle	Description of Principle	Evidence of Principle being Applied within the Proposed Development
Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.	The Proposed Development has used data collected during the PEA and arboricultural survey to ensure that impacts from the Proposed Development will avoid key habitats and species where possible. The loss of habitats has been noted and their replacement or enhancement included within the Landscape Plan GA Plan. Impacts to species such as nesting birds will be avoided through mitigation where required.
Avoid losing biodiversity that cannot be offset by gains elsewhere	Avoid impacts on irreplaceable biodiversity - these impacts cannot be offset to achieve No Net Loss or Net Gain.	No irreplaceable habitats will be lost due to the Proposed Development.
Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.	Liaison with the local planning authorities has been undertaken as part of the planning process.
Address risks	Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.	The BNG assessment has used recognised guidance.
Make a measurable Net Gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.	The proposed development can achieve 10% BNG through the off-site options available.
Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when: ➢ Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses; ➢ Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation; ➢ Achieving Net Gain locally to the development while also; contributing towards nature conservation priorities at local, regional and national levels; ➢ Enhancing existing or creating new habitat; and ➢ Enhancing ecological connectivity by creating more bigger, better and joined areas for biodiversity	The proposed development can achieve 10% BNG through the off-site options available. In the long term this will achieve a better outcome for biodiversity as it will ensure habitat creation to be more joined up and in the right location.
Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).	In the long term this will achieve a better outcome for biodiversity as it will ensure habitat creation to be more joined up and in the right location. However given the temporary nature of the proposed scheme, these habitats have not been counted

Principle	Description of Principle	Evidence of Principle being Applied within the Proposed Development
		towards the total BNG score as they will not be retained and managed for 30 years. Therefore, while the creation of these habitats form a mitigation for the loss of biodiversity from the Site during the project lifespan, they have been included within 'developed land' in the metric to achieve a score of 0.0 biodiversity units.
Create a Net Gain legacy	Ensure Net Gain generates long-term benefits by: ➢ Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity; ➢ Planning for adaptive management and securing dedicated funding for long-term management; ➢ Designing Net Gain for biodiversity to be resilient to external factors, especially climate change; ➢ Mitigating risks from other land uses; ➢ Avoiding displacing harmful activities from one location to another; and ➢ Supporting local-level management of Net Gain activities.	The proposed development can achieve 10% BNG through the off-site options available and therefore no long-term management of the proposed scheme has been proposed. However, during the lifespan of the proposed scheme this will be managed in line with the landscape plan.
Optimise sustainability	Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	This principle has been achieved through production of the Landscape Plan to ensure the implementation of the recommended measures.
Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	Liaison with the local planning authorities and community engagement should be undertaken.

7 Ecological Report Limitations

The information reported herein is based only on the interpretation of data collected during the PEA (ref 104878-PEF-ZZ-XX-RP-GE-400000 P07) and Arboricultural Impact Assessment (104878-PEF-ZZ-XX-RP-GE-400001 P07); and through the Landscape GA Plan (LNS-O2_HTA-L_XX-00_DR_2900). This work pertains specifically to the determination of Biodiversity Net Gain on the proposed Site. Information provided to Pell Frischmann has been accepted as being accurate and valid.

This report has been prepared by Pell Frischmann with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client.

This report should be used for information purposes only and should be reviewed and amended accordingly when a final proposed layout is available.

This report has been prepared solely for the use of LandSec and may not be relied upon by other parties without written consent from Pell Frischmann. In addition, it must be understood that this report does not constitute legal advice.

Pell Frischmann disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.

8 References

CIEEM, CIRIA and IEMA (2019). Biodiversity Net Gain: Good practice principles for development. A practical guide. Available: https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf

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Appendix A Phase 1 Habitat Map

Pell Frischmann

BURRATOR HOUSE, RYDON LANE,
EXETER, EX2 7NT

Legend

Ecology Points
- Scattered Broadleaf Trees

Ecology Lines
- Fence
- Wall

Ecology polygons
- Introduced shrub
- Buildings
- Hardstanding

OpenStreetMap

Finchley Road:
Temporary Carpark
Application

Phase 1 Habitat Map

0 50 100 150 m