



BRADLEY MURPHY DESIGN LTD
6 The Courtyard,
Dark Lane, Hatton
Warwickshire
CV35 8XB

e: info@bradleymurphydesign.co.uk
t: +44 (0)1926 676496
www.bradleymurphydesign.co.uk

BIODIVERSITY NET GAIN PLAN
14 Blackburn Road, London

August 2024

BMD.22.0068.RPE.IA.002. Biodiversity Net Gain Plan

DOCUMENT HISTORY

Project Number: 22.0068		Document Reference: BMD.22.0068.RPE.802.Biodiversity Net Gain Plan			
Revision	Purpose of Issue	Originated	Technical Reviewed	Approved	Date
B	PLANNING	KD	JW	JP	19.08.2024

Declaration of compliance with professional code of ethics or conduct

The information which we have prepared and provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bonafide opinions.

Every reasonable attempt has been made to comply with the relevant best practice guidelines and BS42020:2013 (Biodiversity: Code of practice for planning and development).

Bradley Murphy Design Ltd

6 The Courtyard
Hatton Technology Park
Dark Lane
Hatton
Warwickshire
CV35 8XB

Company No. 7788475

This report is the property of Bradley Murphy Design Ltd. and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without the written consent of Bradley Murphy Design Ltd.

EXECUTIVE SUMMARY

CLIENT	Hampstead Asset Management Limited (“ HAML ”) and Builder Depot Limited (“ BDL ”)
CONSULTANT	Bradley Murphy Design Ltd. (“ BMD ”)

SITE

Location	14 Blackburn Road, West Hampstead, London, NW6 1RZ (“the Site”)
National Grid Reference	Approx. centre TQ 25615 84684
Over-view	The Site comprises a number of commercial units and associated hardstanding.
Landscape context	The Site is located within West Hampstead, London. The wider landscape context beyond is largely urban and industrial with the centre of London to the south-east. A more detailed description of the habitats on site is provided within the Ecological Assessment (including initial bat assessment) (reference: BMD.22.0068.RPE.801.-.Ecology&Bat).

DEVELOPMENT & PLANNING BACKGROUND

Proposed works	Development proposals seek to deliver additional commercial development at the Site. .
Planning stage	Full planning application stage.

ECOLOGICAL BACKGROUND

General	The most recent comprehensive ecological assessment of the Site was undertaken by BMD in November 2022.
---------------	---

ASSESSMENT

Objectives	To provide baseline data pertaining to potential biodiversity net gain as a result of the current development proposals for the Site.
Approach	Quantitative Biodiversity Net Gain Assessment using The Statutory Biodiversity Metric.
Date	August 2024.

RESULTS & CONCLUSIONS

Quantitative (predicted Biodiversity Net Gain)	a positive habitat biodiversity unit change of 374.59% is anticipated based on the current creation proposals associated with a green roof area.
Qualitative	In addition to this quantitative assessment a number of qualitative gains are also considered to be achievable.

RECOMMENDATIONS

Opportunities for enhancement include the use of native and wildlife friendly species within any soft landscaping and the installation of bird, bat and invertebrate boxes.

CONTENTS

1.	INTRODUCTION	1
1.1	Background Information.....	1
1.2	Proposed Development.....	Error! Bookmark not defined.
1.3	Site Context	3
1.4	Ecological Context	Error! Bookmark not defined.
2.	BIODIVERSITY NET GAIN	4
2.1	Biodiversity Net Gain	4
2.2	National Planning Policy Framework 2023 (NPPF)	4
2.3	Biodiversity Net Gain Good Practice.....	5
3.	APPROACH	6
3.1	Overview	6
3.2	Biodiversity.....	6
3.3	Area Habitats, Linear Features & Point Features	6
3.4	Habitat Distinctiveness.....	7
3.5	Habitat Condition	8
3.6	Irreplaceable Habitats & Very High Distinctiveness Habitats	8
3.7	Metric Principles & Rules.....	9
3.8	Pre-development baseline habitats.....	10
3.9	Predicted post-development habitat	10
3.10	Methodology for drawing and measuring.....	11
3.11	Auditing biodiversity net gain as the development progresses	11
4.	APPLICATION OF GOOD PRACTICE BIODIVERSITY NET GAIN PRINCIPLES	12
5.	APPLICATION OF PROFESSIONAL JUDGEMENT	13
5.1	Pre-Development Habitats	13
5.2	Post-Development Habitats	13
5.3	Pre-Enhancement Habitats and Post-Enhancement Habitats Assumptions Tables	14
6.	RESULTS	16
6.1	Statutory Biodiversity Metric Results	16
6.3	Trading Rules.....	17
7.	REFERENCES AND BIBLIOGRAPHY	19
8.	GLOSSARY	21
8.1	Scientific Terms and Acronyms.....	21

APPENDICES

	APPENDICES.....	I
	PLANS & SUPPORTING FIGURES.....	II
A.	METADATA AND LIMITATIONS	III
A.1	Metadata	iii
A.2	Limitations review	iv

TABLES AND FIGURES

Table 3.1 The Statutory Biodiversity Metric habitat attributes and pre-populated status.....	6
Table 3.2 Tree size classes and area equivalents (DEFRA, 2023)	7
Table 3.3 The Statutory Biodiversity Metric distinctiveness categories, scores and criteria (DEFRA 2023).	7
Table 3.4 The Statutory Biodiversity Metric condition categories and scores (DEFRA, 2023)	8
Table 3.5 The Statutory Biodiversity Metric principles and rules (DEFRA, 2023)	10
Table 4.1 Application of the Good Practice Biodiversity Net Gain Principles	12
Table 5.1 Justification of condition and strategic significance of pre-development baseline habitats for the Site.....	14
Table 5.2 Justification of condition and strategic significance of post-development created & retained habitats for the Site	15
Table 6.1 Statutory Biodiversity Metric calculations – habitat baseline	16
Table 6.2 Statutory Biodiversity Metric calculations – habitat creation	17

1. INTRODUCTION

1.1 Background Information

- 1.1.1 This Biodiversity Net Gain Plan, prepared by BMD, is submitted on behalf HAML and BDL (together “**the Applicant**”) to accompany an application for full planning permission for the development at 14 Blackburn Road, London, SW6 1RZ (“**the Site**”).
- 1.1.2 The Site is occupied by various warehouses (between one and two storeys). The Site is bound along its northern edge by Blackburn Road and railway land to the south (serving the Metropolitan and Jubilee lines between West Hampstead Underground Station and Finchley Road). The West Hampstead Underground Station, together with retail facing on to West End Lane, lies to the west of the Site.
- 1.1.3 Opposite the Site are a number of developments, including the part 6 part 8 storey iQ Student Accommodation (at Haywood House, Blackburn Road), the three storey Clockwork Factory, as well as five x three storey residential properties closer to the West End Lane end of Blackburn Road. The Clockwork Factory is subject to a new planning application, which seeks consent for three residential buildings of up to nine storeys in height.
- 1.1.4 To the northeast, the Site is bound by a pocket of industrial land and two commercial units owned and operated by Audi. Further to the east of the Site comprises the O2 Shopping Centre, which contains a mix of uses including retail units, community uses and restaurants, two large commercial superstores and associated car parking.
- 1.1.5 The Site contains no listed buildings and is not within a Conservation Area however it neighbours the South Hampstead Conservation Area, located to the south of the Site. Although not currently an allocated site, the Site sits within the West Hampstead Interchange Area and a Call for Sites application has been submitted.
- 1.1.6 The Site has the benefit of an implemented scheme, consented in 2004 under planning permission with reference PWX0202103 dated 6 January 2004 (the ‘**2004 Permission**’), which will provide 14 residential units within a western block, as well as a four storey eastern block, comprising two storeys of warehouse floorspace and two storeys of office floorspace (the ‘**Implemented Development**’).
- 1.1.7 To add three additional floors of commercial floorspace to the eastern block forming part of the Implemented Development, the Applicant seeks full planning permission for the following description of development (herein ‘**the Proposed Development**’):
- 1.1.8 “The erection of three floors of commercial floorspace (Use Class Eg), together with cycle parking, and associated works.”
- 1.1.9 In tandem, the Applicant has submitted a section 73 application to alter conditions attached to the 2004 Permission to substitute certain drawings authorised by the 2004 Permission in order to provide for the additional three storeys to be constructed on the eastern block as part of the Proposed Development. The section 73 application also seeks consent for certain internal changes within the eastern block to suit

the Applicant's operational needs, as well as improvements to external fenestration. The description of development for the section 73 application is as follows:

- 1.1.10 "Variation of Condition 2 (approved plans) pursuant to planning permission [PWX0202103] dated 06.01.2004 for Redevelopment of whole site by the erection of a 4 storey eastern block comprising two Class B8 and eight Class B1 units with associated service yard, together with a 4 storey plus basement western block comprising 8 dwellinghouses and 6 self-contained flats with associated underground car parking. Changes include: revisions to ground floor elevation and roof plan" (referred to as the '**S73 Development**').
- 1.1.11 While this report has been prepared in support of the application for full planning permission, which only concerns the introduction of three additional floors of commercial floorspace to the consented eastern block, in carrying out its assessment BMD has considered the entire Site. BMD has considered the opportunities for biodiversity enhancement following completion of the Proposed Development.
- 1.1.12 The overarching vision behind the proposals is to optimise the Site, providing additional commercial space above the already implemented proposals to contribute to the wider objectives for this part of West Hampstead ('**West Hampstead Interchange Area**').
- 1.1.13 The proposals have been the subject to pre-application discussions with Camden Council. Likewise, there has been positive public consultation with surrounding occupiers, both residential and local businesses.
- 1.1.14 To prepare this report, the following assessments were completed in November 2022:
- 1.1.15 A quantitative assessment of predicted biodiversity net gain post-development compared with a 'no development' situation using a biodiversity impact matrix has been completed (current document); and
- 1.1.16 A qualitative assessment of net gain associated with new habitat creation and provision of other enhancements such as species features.
- 1.1.17 This report accompanies and presents the results of the biodiversity impact calculation (provided in the Appendix) undertaken at the Site to demonstrate net gain of biodiversity as a result of the Proposed Development.
- 1.1.18 The following assessments were completed in March 2024:
 - A quantitative assessment of predicted biodiversity net gain post-development compared with a 'no development' situation using a biodiversity impact matrix has been completed (current document); and,
 - A qualitative assessment of net gain associated with new habitat creation and provision of other enhancements such as species features.
- 1.1.19 This report accompanies and presents the results of the biodiversity impact calculation (provided in the Appendix) undertaken at the Site to demonstrate net gain of biodiversity as a result of the proposals, hereafter referred to as the 'Scheme'.

1.2 Site Context

Historic Context

- 1.2.1 The Historic County Series Maps for the Site indicate that in the late 1800s the Site comprised of commercial buildings. The Site was surrounded by residential dwellings and other commercial units, with the West Hampstead railway line bounding to the south. The Site and surrounding land use remained unchanged during the 1900s aside from further urban development within London. The Site and surrounding area have remained largely unchanged since this time.

Present Context

- 1.2.2 The Site currently houses an active builders depot consisting of a number of large pitched and flat roofed warehouses and outbuildings, bounded to the north by Blackburn Road, materials storage areas and carparking to the east. The Site is bound to the south by West Hampstead railway line and a short section of scrub and introduced shrub. Further residential dwellings and commercial units lie adjacent to all aspects of the Site.
- 1.2.3 The wider landscape is dominated by the commercial units and residential dwellings of West Hampstead. The A41 runs north-south east of the Site and the B510 runs north-south west of the Site. Beyond the limits of West Hampstead, the landscape is dominated by industrial and residential development. The railway corridor forms a green link east to west, with a number of greenspaces including playing fields and formal parks further north.
- 1.2.4 A review of readily available aerial images indicates that there has been little change in the landscape character over the last 70 years.

1.1 Ecological Context

- 1.1.1 BMD undertook a preliminary Ecological Assessment (including initial bat assessment) of the Site in November 2022 (Ref: BMD.22.0068.RPE/P1.801.-.Ecology&Bat).

2. BIODIVERSITY NET GAIN

2.1 Biodiversity Net Gain

2.1.1 Biodiversity Net Gain is defined as:

- “Development that leaves biodiversity in a better state than before, and an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation”. (Baker et al., 2019)

2.1.2 Previously, various percentage targets are used across the country and in schemes such as BREEAM, it is noted that there is no consistent agreed target percentage gain at either national or local level. However, as of November 2021, The Environment Act 2021 states under Schedule 14 that provision are to be made *“for biodiversity gain to be a condition of planning permission in England.”* (HM Government 2021). Proposals indicate a minimum 10% net gain will become mandate by early 2024.

2.1.3 In England, biodiversity net gain (BNG) is becoming mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This became mandatory on 12th of February 2024.

2.1.4 Developers must deliver a biodiversity net gain of 10%. This means a development will result in more or better quality natural habitat than there was before development.

2.1.5 The Site is approximately 0.03 ha and as such would qualify for the Small Sites Metric. However, this metric isn’t currently mandatory and therefore in line with best practise and consistency a full statutory metric approach was adopted for the application.

2.2 National Planning Policy Framework 2023 (NPPF)

2.2.1 The NPPF places strong emphasis on achieving net gain in all developments (not just ‘no net loss’) through the planning systems purpose of achieving sustainable development (HM Government 2023). The NPPF notes three overarching objectives to achieve sustainable development and opportunities to be taken to secure net gain in each. The environmental objective relates to biodiversity:

- “to 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” (HM Government 2023).

2.2.2 As set out in ‘Section 5. Conserving and enhancing the natural Environment’ of the Framework:

- “development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve 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” (HM Government 2021b, paragraph 180(d)).

2.3 Biodiversity Net Gain Good Practice

2.3.1 In 2016 (Baker, 2016) a set of Good Practice Biodiversity Net Gain Principles were defined and underpin the current best practice guidance for development (Baker *et al.*, 2019). These principles are:

- Principle 1: Apply the mitigation hierarchy;
- Principle 2: Avoid losing biodiversity that cannot be offset elsewhere;
- Principle 3: Be conclusive and equitable;
- Principle 4: Address risk;
- Principle 5: Make a measurable net gain contribution;
- Principle 6: Achieve the best outcomes for biodiversity;
- Principle 7: Be additional;
- Principle 8: Create a net gain legacy; Okay great
- Principle 9: Optimise sustainability; and
- Principle 10: Be transparent.

3. APPROACH

3.1 Overview

- 3.1.1 This assessment is being completed in accordance with the Good Practice Biodiversity Net Gain Principles set out in Section 4.
- 3.1.2 Details of the approach used to determine the baseline biodiversity conditions at the Site and predicted biodiversity net gain of the Site are documented below.
- 3.1.3 The Site was subject to a Ecological Assessment undertaken during 2022. This included a review of the current condition of the habitats on Site.
- 3.1.4 This biodiversity net gain assessment uses the Statutory Biodiversity Metric in line with best practice.

3.2 Biodiversity

- 3.2.1 The quantitative assessment for this biodiversity gain plan uses the Statutory Biodiversity Metric to provide a transparent and replicable numeric value of biodiversity before and after enhancement. The metric only considers habitats and does not take protected and notable species into account.
- 3.2.2 The values take a number of habitat attributes into consideration, these are displayed below within Table 3.1. These habitat attributes are either pre-populated by the Statutory Biodiversity Metric parameters or determined by information available on the pre-development baseline habitats or the post-development predicted habitats and professional judgement.

Table 3.1 The Statutory Biodiversity Metric habitat attributes and pre-populated status

Habitat Attribute	Pre-populated Status
Area or length	Determined by available information and professional judgement
Distinctiveness	Distinctiveness is a measure based on the type of habitat and its distinguishing features. Professional survey is required to determine habitat type. The biodiversity metric tool automatically assigns distinctiveness category to selected habitats.
Condition	Determined by available information and professional judgement using the metric condition assessments
Strategic significance	Determined by available information and professional judgement
Time to target condition	Determined by metric parameters
Difficulty to create/restore	Determined by metric parameters

- 3.2.3 An overview of the Statutory Biodiversity Metric principles, rules and key components are described in the following sections.

3.3 Area Habitats, Linear Features & Point Features

- 3.3.1 Area habitats such as ‘Wet woodland’ are measured in hectares within the Statutory Biodiversity Metric, while linear features such as ‘Native hedgerow’ are measured in kilometres. The only point features

- included in the metric are trees, e.g. 'Rural tree', these are measured in hectares based on their tree canopy, calculated using the 'Tree helper' tool of the Statutory Biodiversity Metric.
- 3.3.2 Linear features are divided into 'Hedgerows' and 'Watercourses' and are dealt with separately in the metric.
- 3.3.3 The area of a watercourse may be recorded in the area module as the category 'watercourse footprint'. There are no biodiversity units associated with this category and all biodiversity units generated by watercourses are reported within the watercourse tab.
- 3.3.4 Point features such as 'Urban tree' are allocated size categories which are then summed and calculated as a canopy area in hectares. Table 3.2 displays these size classes and area equivalents below, further information can be found within the Statutory Biodiversity Metric User Guide Draft (Department for Environment, Food and Rural Affairs, 2023). The biodiversity metric uses set values to represent the area of trees depending on their diameter at breast height. This value is a representation of canopy biomass, and is based on the root protection area formula, derived from BS 5837:2012. The metric will:
- Account for each individual tree within a group or block of trees;
 - Record the habitat underneath the tree canopy separately;
 - Not reduce any area generated by the tree helper;
 - Not deduct the area of individual trees from other habitats; and
 - Make clear in the user comments how many trees contribute towards the total area.
- 3.3.5 'Individual tree' area is not added onto the total site area, as these point features are treated as a secondary layer that sits above the total site area on the ground. However, the biodiversity value provided by the 'Individual tree' area is added onto the total site biodiversity value.

Table 3.2 Tree size classes and area equivalents (DEFRA, 2023)

Size	Diameter at Breast Height (cm)	Metric area Equivalent (ha)
Small	7-30	0.0041
Medium	31-60	0.0163
Large	60-90	0.0366
Very large	90	0.0765

3.4 Habitat Distinctiveness

- 3.4.1 Habitat distinctiveness is allocated as one of five possible categories, these categories are automated within the Statutory Biodiversity Metric. Table 3.3 below displays the distinctiveness categories, scores and criteria, further information can be found within the Statutory Biodiversity Metric User Guide Draft (Department for Environment, Food and Rural Affairs, 2023).

Table 3.3 The Statutory Biodiversity Metric distinctiveness categories, scores and criteria (DEFRA 2023).

Distinctiveness	Score	Criteria
Very High	8	- <i>“Priority Habitats as defined in Section 41 of the Natural Environment and Rural Communities (NERC) Act that are highly threatened, internationally scarce and require conservation action.</i> - <i>Small amount of remaining habitat with a high proportion unprotected by designation.</i> - <i>Endangered or Critical European red list habitats.”</i>
High	6	- <i>“Priority Habitats as defined in Section 41 of the NERC Act requiring conservation action.</i> - <i>Remaining Priority Habitats not in very high distinctiveness band & other red list habitats.”</i>
Medium	4	- <i>“Semi-natural habitats not classed as a Priority Habitat but with significant wildlife benefit e.g., mixed scrub.</i> - <i>One Priority Habitat (arable field margins).”</i>
Low	2	- <i>“Habitat of low biodiversity value e.g. temporary grass and clover ley.</i> - <i>Agricultural and Urban land of lower biodiversity value.”</i>
Very Low (hedgerow)	1	- <i>“Little or no biodiversity value.”</i>
Very Low (area & watercourse)	0	- <i>“Little or no biodiversity value.”</i>

3.5 Habitat Condition

3.5.1 Habitat condition is allocated as one of seven possible categories. These categories are determined by information available on the pre-development baseline habitats or the post-development predicted habitats. Professional judgement is used to interpret the information available and applied when using the habitat condition assessment sheets when assessing whether a habitat meets or fails condition criteria set out by the Statutory Biodiversity Metric.

3.5.2 These condition criteria are specific to each habitat type, further information can be found within the Statutory Biodiversity Metric User Guide Draft and accompanying condition sheets (Department for Environment, Food and Rural Affairs, 2023). Where the same habitat types occur within the Site but have different condition categories, they have been assessed separately within the metric. Table 3.4 below displays the condition categories and scores.

Table 3.4 The Statutory Biodiversity Metric condition categories and scores (DEFRA, 2023)

Condition	Score
Good	3
Fairly Good	2.5
Moderate	2
Fairly Poor	1.5
Poor	1
Condition Assessment N/A	1
N/A - Other	0

3.6 Irreplaceable Habitats & Very High Distinctiveness Habitats

3.6.1 Irreplaceable habitats are defined as:

- *“Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or*

rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.” (NPPF, 2019)

3.6.2 Due to the nature of irreplaceable habitats, their biodiversity value cannot be quantified and therefore these habitats are dealt with separately within the Statutory Biodiversity Metric. Irreplaceable habitats (as provided for in secondary legislation for BNG) do not have a BNG requirement as they are too valuable to be compensated for. As such, any losses to irreplaceable habitats cannot be calculated by the biodiversity metric tool and they are removed from the baseline. An inventory of these habitats is compiled within the ‘Irreplaceable Habitats’ tab of the metric, where bespoke compensation agreed with the relevant consenting body is detailed. However, it should be noted that any impact on an irreplaceable habitat is strongly advised against, as bespoke compensation will only be agreed upon in exceptional circumstances.

3.6.3 Very high distinctiveness habitats (VHDH) are defined as:

- “VHDH are highly threatened, internationally scarce habitats which require conservation action. Impacts to these habitats should be avoided in line with planning policy.” (DEFRA, 2023).
- These habitats were described in further detail within the previous BNG guidance and include:
 - “Priority Habitats as defined in Section 41 of the Natural Environment and Rural Communities (NERC) Act that are highly threatened, internationally scarce and require conservation action, for example blanket bog.
 - Small amount of remaining habitat with a high proportion unprotected by designation.
 - Critically Endangered European Red List habitats.” (Panks et al. 2023c).

3.6.4 Similarly to irreplaceable habitats, the very high distinctiveness nature of these habitats is difficult to quantify and therefore these habitats also require bespoke compensation within the Statutory Biodiversity Metric. VHDH are included within the main ‘Baseline, Enhancement & Creation’ tabs of the metric. Impact on or creation of these habitats will require comprehensive compensation or justification to satisfy the relevant consenting body.

3.6.5 Refer to The Biodiversity Metric 4.0 User Guide – Technical Annex 2 (Panks *et al.* 2023c) for a full list of VHDH.

3.7 Metric Principles & Rules

3.7.1 The Statutory Biodiversity Metric may be used to carry out assessments of biodiversity net gain and inform plans and decision making if the metric principles and rules are adhered to. Table 3.5 below lists the principles and rules of the Statutory Biodiversity Metric. Further details of these principles and rules can be found within the Statutory Biodiversity Metric User Guide (DEFRA, 2023).

Table 3.5 The Statutory Biodiversity Metric principles and rules (DEFRA, 2023)

Principles	
1	"The metric assessment should be completed by a competent person."
2	"The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands."
3	"This biodiversity metric should be used in accordance with established good practice guidance and professional codes."
4	"This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice."
5	"Biodiversity units are a proxy for biodiversity and should be treated as relative values."
6	"This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance."
7	"Habitat interventions need to be realistic and deliverable within a relevant project timeframe."
8	"Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation."
9	"The metric does not enforce a minimum habitat size ratio for compensation of losses. However, proposals should aim to: <ul style="list-style-type: none"> • maintain habitat extent (supporting more, bigger, better and more joined up ecological networks) and • ensure that proposed or retained habitat parcels are of sufficient size for ecological function."
Rules	
1	"The trading rules of this biodiversity metric must be followed."
2	"Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit."
3	"To accurately apply the biodiversity metric formula, you must use the biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met."
4	"In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority."

3.8 Pre-development baseline habitats

3.8.1 The baseline habitat data from which net biodiversity change is calculated using the Phase 1 Habitat Survey completed by BMD in 2022 (BMD.22.0068.DRE.901) and is provided in the Appendix: Plans. The Phase 1 Habitat Survey was conducted by BMD to industry standard at the time (JNCC, 2010).

3.9 Predicted post-development habitat

3.9.1 The Statutory Biodiversity Metric requires the following information to inform the predicted post-development development habitats.

- Habitat type;
- Habitat area or length;

- Habitat condition;
- Irreplaceable habitat; and
- Strategic significance.

3.9.2 Plans depicting the post-enhancement retained, enhanced and created habitats of the Site are provided in the Appendix (Ref: 21068.P-106-Proposed Roof).

3.10 Methodology for drawing and measuring

3.10.1 Pre-development and post-development data has been imported to GIS software (ArcGIS Desktop 10.8 & ArcGIS Pro 3.1) to enable a direct comparison between each scenario and an accurate, replicable method of measuring. Measurements taken from the GIS have been input into the assumptions table and then into the Statutory Biodiversity Metric calculation tool that has been used for this assessment.

3.10.2 The full completed Statutory Biodiversity Metric Calculation Tool with supporting assessor comments is appended to this technical note.

3.11 Auditing biodiversity net gain as the development progresses

3.11.1 The specifics of the use of the Statutory Biodiversity Metric in auditing biodiversity net gain achievements, as the development progresses, is currently under refinement and will be developed further as part of the secondary legislation required for implementation of the Environment Act 2021.

3.11.2 The predicted post-development baseline will be calculated from the following data;

- Plans provided in the appendix.
- Detailed plans, drawings, documents and specifications submitted for planning.
- Construction issue plans, drawings, and specifications (if available).
- As built information (if available).

4. APPLICATION OF GOOD PRACTICE BIODIVERSITY NET GAIN PRINCIPLES

4.1.1 Throughout the progression and implementation of the Scheme, the Good Practice Biodiversity Net Gain Principles have been applied.

4.1.2 Table 4.1 demonstrates how each principle, listed in Section 1, has been applied since the Ecological Assessment completed in 2022 and will be applied going forward.

Table 4.1 Application of the Good Practice Biodiversity Net Gain Principles

Principle	Application of the principles
Principle 1: Apply the mitigation hierarchy	There are no high value habitats within the Site. There is some loss of low value habitat, however these habitats have been compensated accordingly.
Principle 2: Avoid losing biodiversity that cannot be offset elsewhere	No irreplaceable habitats are affected by the development. Biodiversity Net Gain is achieved within the existing site boundary.
Principle 3: Be inclusive and equitable	The proposals will deliver Biodiversity Net Gain within the locality where biodiversity losses occur.
Principle 4: Address risk	The proposed auditing approach allows for risk to be assessed at appropriate intervals to ensure, as a minimum, the proposed future net gain will be achieved by the end of the development build-out period. Habitat creation/enhancement risks are provided in the detail of the Biodiversity Metric 3.1 by default.
Principle 5: Make a measurable net gain contribution	Both quantitative and qualitative measures have been put in place to ensure that net gain is measurable. These are documented in this current report.
Principle 6: Achieve the best outcomes for biodiversity	A robust biodiversity baseline was completed in 2022 following best practice guidelines. This has allowed informed decisions to be made in relation to incorporating biodiversity into the most recent development proposals. The most recent baseline conditions have informed detailed soft landscape design and composition that is appropriate for the local conditions.
Principle 7: Be additional	The newly created habitats within the Site will be reflective of the wider landscape, e.g. use of green roof to create substrate/vegetated type plant communities similar to railway sidings/embankments present locally.
Principle 8: Create a net gain legacy	The design of the Proposed Development illustrate the landscape areas to be implemented within the scheme, which will be subject to ongoing management. This will help ensure a net gain legacy is achieved.
Principle 9: Optimise sustainability	The principles within the design vision will be carried through design stages to implementation on the ground, therefore promoting sustainability.
Principle 10: Be transparent.	The detailed results of the Biodiversity Net Gain assessment are provided with this report.

5. APPLICATION OF PROFESSIONAL JUDGEMENT

5.1 Pre-Development Habitats

5.1.1 Table 5.1 below summarise the professional judgements made in relation to the baseline condition of habitats pre-development based on the available survey and data. Where information is lacking or not detailed enough, judgements are made based on standard default conditions for typical habitat types.

5.1.2 For the purposes of The Statutory Biodiversity Metric, Phase 1 Habitat Types are converted into UK Hab habitat types, as informed by the conversion tool in the technical information tab within the metric. This applies to both baseline and created habitat type.

5.2 Post-Development Habitats

5.2.1 Table 5.2 below summarise the professional judgements made in relation to the predicted condition of created habitats. These judgements are based on the standard landscape types and aspirations for commensurate sites and are informed by a number of approved/verified methods.

5.2.2 No irreplaceable habitats were recorded within the baseline.

5.2.3 Should detailed landscape proposals differ significantly from those used in the current calculation, an updated biodiversity impact assessment will be required to ensure continued net gain of biodiversity.

5.3 Pre-Enhancement Habitats and Post-Enhancement Habitats Assumptions Tables

Table 5.1 Justification of condition and strategic significance of pre-development baseline habitats for the Site

Habitat Type	Justification	Condition	Strategic Significance
Building/Hardstanding	Areas of hardstanding and building on Site	N/A	Area/compensation not in local strategy/no local strategy
Urban tree	A single small sycamore is present on the north eastern boundary	Poor	Area/compensation not in local strategy/no local strategy
Vacant ground	A small area within the north east corner of the site containing buddleia.	N/A	Area/compensation not in local strategy/no local strategy
<p>Notes</p> <p>¹ See the 'Assessor Comments' in the completed Statutory Metric with regard to identification of these habitats and rationale for conversions of JNCC Phase 1 Habitats into the UK Habitat Classification system.</p>			

Table 5.2 Justification of condition and strategic significance of post-development created & retained habitats for the Site

Habitat Type	Justification	Condition	Strategic Significance
Proposed			
Buildings/hardstanding	-	N/A	Buildings/hardstanding
Other green roof	Green roofs will be wildflower meadow and shrubbery which are exclusive habitat space i.e. no access for public	N/A	Other green roof
Notes			
¹ See the 'Assessor Comments' in the completed Statutory Metric with regard to identification of these habitats and rationale for conversions of JNCC Phase 1 Habitats into the UK Habitat Classification system.			

6. RESULTS

6.1 Statutory Biodiversity Metric Results

6.1.1 The outcome of the biodiversity net gain assessment for area habitats is provided in Figure 6.1 and detailed in the supporting the Statutory Biodiversity Metric.

6.1.2 As demonstrated, a positive habitat biodiversity unit change of 374.59% is anticipated based on the current creation proposals associated with a green roof area.

6.1.3 There are no hedgerow or river features in the baseline habitats or creation/retained/enhanced proposals in this case.

6.2 Metric Results

6.2.1 Results of the metric are summarised in table 6.1-6.2 below. A full copy of the Metric in Excel format will be supplied separately for detailed reference if required. Please note that some habitats within the baseline are retained.

Table 6.1 Statutory Biodiversity Metric calculations – habitat baseline

Habitat	Area (ha)	Distinctiveness	Condition	Total Habitat Units
Developed land; sealed surface	0.21	V.Low	N/A - Other	0.00
Developed land; sealed surface	0.07	V.Low	N/A - Other	0.00
Vacant or derelict land	0.004	Low	Poor	0.01
Urban tree	0.0041	Medium	Poor	0.02
Total				0.03

Table 6.2 Statutory Biodiversity Metric calculations – habitat creation

Habitat	Area (ha)	Distinctiveness	Condition	Total Habitat Units
Developed land; sealed surface	0.23	V.Low	N/A - Other	0.00
Other green roof	0.06	Low	Condition Assessment N/A	0.12
Total				0.12

6.3 Trading Rules

6.3.1 Trading rules are not strictly satisfied with regard to low distinctiveness habitats (-0.02 units) which is in relation to the single urban tree loss within the Site. However, it is noted that the scheme as a whole does provide a significant level of onsite mitigation in the form of a green roof.

Fig 6.1. Summary Biodiversity Net Gain Assessment – Habitats calculations for the Site (see supporting Statutory Biodiversity Metric for detailed results and further information).

On-site baseline	Habitat units	0.02			
	Hedgerow units	0.00			
	Watercourse units	0.00			
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.12			
	Hedgerow units	0.00			
	Watercourse units	0.00			
On-site net change (units & percentage)	Habitat units	0.09	374.59%		
	Hedgerow units	0.00	0.00%		
	Watercourse units	0.00	0.00%		
Off-site baseline	Habitat units	0.00			
	Hedgerow units	0.00			
	Watercourse units	0.00			
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00			
	Hedgerow units	0.00			
	Watercourse units	0.00			
Off-site net change (units & percentage)	Habitat units	0.00	0.00%		
	Hedgerow units	0.00	0.00%		
	Watercourse units	0.00	0.00%		
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.09			
	Hedgerow units	0.00			
	Watercourse units	0.00			
Spatial risk multiplier (SRM) deductions	Habitat units	0.00			
	Hedgerow units	0.00			
	Watercourse units	0.00			
FINAL RESULTS					
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.09			
	Hedgerow units	0.00			
	Watercourse units	0.00			
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	374.59%			
	Hedgerow units	0.00%			
	Watercourse units	0.00%			
Trading rules satisfied?	No - Check Trading Summaries ▲				
Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Habitat units	10.00%	0.02	0.03	0.00	No additional area habitat units required to meet target ✓
Hedgerow units	10.00%	0.00	0.00	0.00	No additional hedgerow units required to meet target ✓
Watercourse units	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓

7. REFERENCES AND BIBLIOGRAPHY

- Baker, J (2016). Biodiversity Net Gain Good Practice Principles for Development
- Baker, J., Hoskins, R., Butterworth, T. (2019). Biodiversity Net Gain. Good Practice Principles for Development. A Practical Guide. CIRA
- BMD (2023). *Ecological Assessment (Including Initial Bat Assessment) 14 Blackburn Road, London*. March 2023. Hatton. Bradley Murphy Design. BMD.22.0068.RPE/P1.801.-.Ecology&Bat .
- British Standards Institute (BSI) (2013). BS42020 - Biodiversity Code of Practice for Planning and Development. BSI, London
- British Standards Institute (BSI) (20202). BS8683 – Designing and Implementing Biodiversity Net Gain. BSI, London
- CIEEM (2017). *Guidelines on Ecological Report Writing* (2nd ed). Winchester: CIEEM
- Department for Environment, Food and Rural Affairs. (2023). The Statutory Biodiversity Metric User Guide. DEFRA. February 2024.
- Environment Bill summer policy statement: July 2019.
<https://www.gov.uk/government/publications/draft-environment-principles-and-governance-bill-2018/environment-bill-summer-policy-statement-july-2019> [Accessed 15/08/2024]
- HM Government (1981). *Wildlife and Countryside Act 1981 (as amended)*.
- HM Government (2000). *Countryside and Rights of Way Act, 2000*.
- HM Government (2005). *ODPM Circular 06/05 Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System*.
- HM Government (2017). The Conservation of Habitats and Species Regulations 2017, as amended.
- HM Government (2021). *National Planning Policy Framework*. Department for Communities and Local Government.
- HM Government (2021a). *Environment Act 2021*. (C30)
- HM Government (2021b). *National Planning Policy Framework. Department for Communities and Local Government*. <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Accessed 15/08/2024]
- HM Government (2023). *National Planning Policy Framework*. Department for Communities and Local Government.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf [Accessed 15/08/2024]
- JNCC (2010). Handbook for Phase 1 habitat survey: a technique for environmental audit. Natural England.
- Maddock, A (ed.) (2008c). UK Biodiversity Action Plan; Priority Habitat Descriptions (Updated Dec 2011).
- Panks, S. et al. (2023a). Biodiversity metric 4.0: Auditing and accounting for biodiversity – User Guide. Natural England.
- Panks, S. et al. (2023b). Biodiversity metric 4.0 Auditing and accounting for biodiversity – Technical Supplement. Natural England.
- Panks, S. et al. (2023c). The Biodiversity metric 4.0 – User Guide – Technical Annex 2. Natural England.
- Treweek J. et al. (2009) Scoping study for the design and use of biodiversity offsets in an English Context
- Treweek J., Butcher B., and Temple H. (2010) Biodiversity offsets: possible methods for measuring biodiversity losses and gains for use in the UK. CIEEM In Practice

UKHab Ltd. (2023). UK Habitat Classifications – Habitat Definitions V2.0. <https://ukhab.org/> [Accessed 15/08/2024]

8. GLOSSARY

8.1 Scientific Terms and Acronyms

CIEEM Chartered Institute of Ecology and Environmental Management, the professional organisation and provider of professional codes of conduct for ecological consultancy.

NPPF National Planning Policy Framework.

Notable species A species which is listed as a UK Priority Species, carries an unfavourable conservation status (e.g. scarce, rare, threatened, Red-listed), is invasive or is otherwise worthy of note from an ecological perspective.

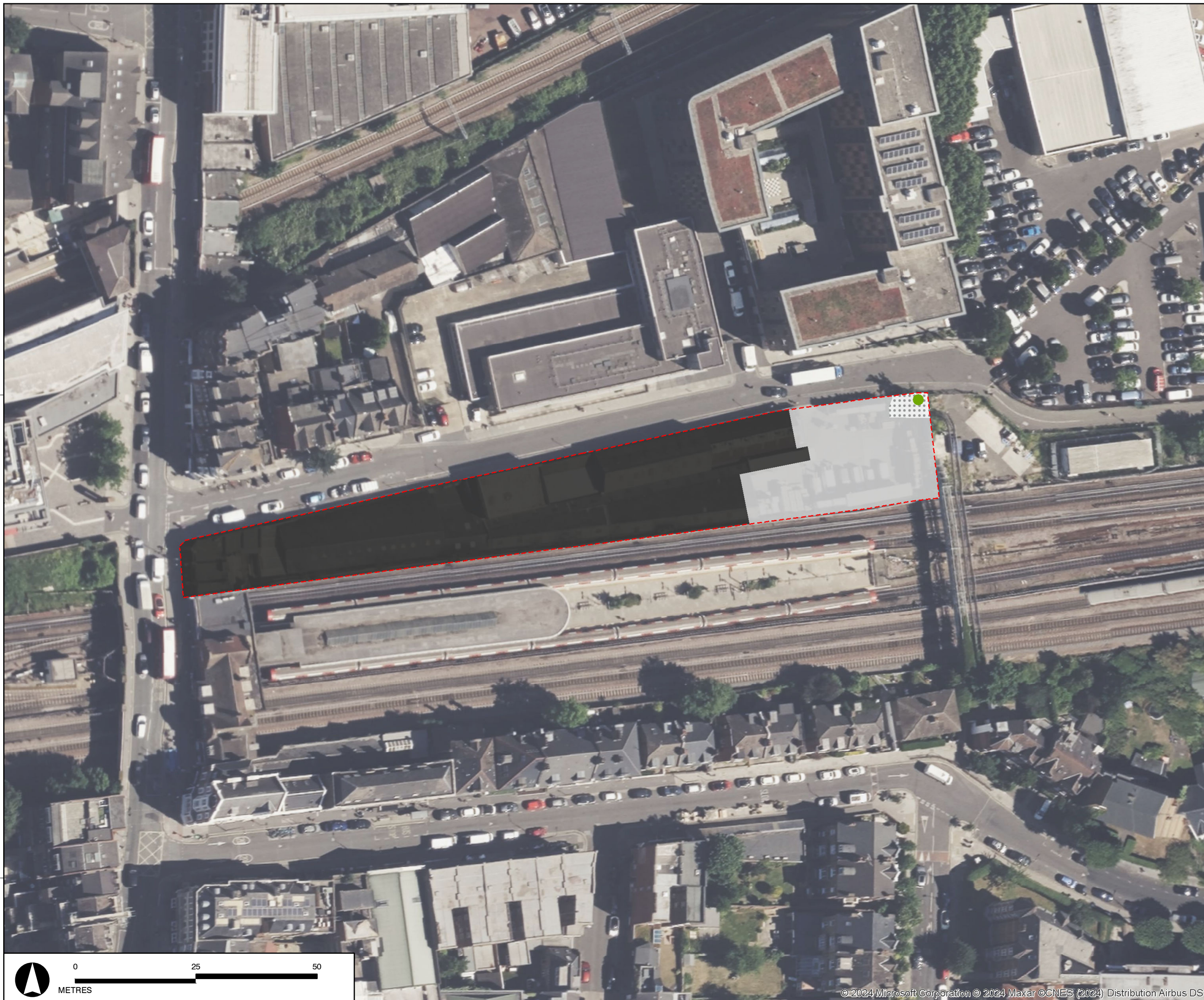
Protected species A species protected under specific UK or European legislation, including Habitats Directive, Wildlife and Countryside Act.

SAP Species Action Plan.

SSSI Site of Species Scientific Interest. Statutory designation of biological or geological importance.


UK Priority Habitat and species A habitat or species identified as a priority for conservation in accordance with Section 41 of the Natural Environment and Rural Communities Act (2006). Section 40 of the NERC Act 2006 places a duty on public authorities to have regard for the conservation objectives of these habitats / species (also known as Section 41 (S41) habitats/species).

APPENDICES







This drawing is property of Bradley Murphy Design Ltd. Copyright is reserved by them and the drawing is issued on the condition that it is not copied, reproduced, retained nor disclosed to any unauthorised person either wholly or in part without the consent of Bradley Murphy Design Ltd.

OS Crown Copyright 2023 Licence Number 100022432

 Application boundary (2,855.0m²)

Baseline Habitat Description

-  Vacant ground (39.9m²)
-  Building (2,096.8m²)
-  Other habitat (718.3m²)
-  Scattered tree (1)

Rev	Description	
--	--	--

Purpose of Issue
PLANNING

Bradley Murphy Design Ltd
6 The Courtyard
Hatton Technology Park
Dark Lane
Hatton
Warwickshire
CV35 6XB
t: 01926 676496
e: info@bradleymurphydesign.co.uk
www.bradleymurphydesign.co.uk

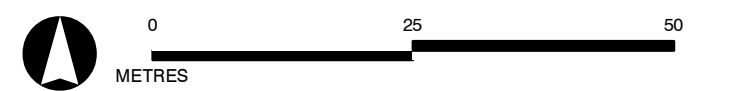


Client
HAMPSTEAD ASSET MANAGEMENT LTD

Project
BLACKBURN ROAD, CAMDEN

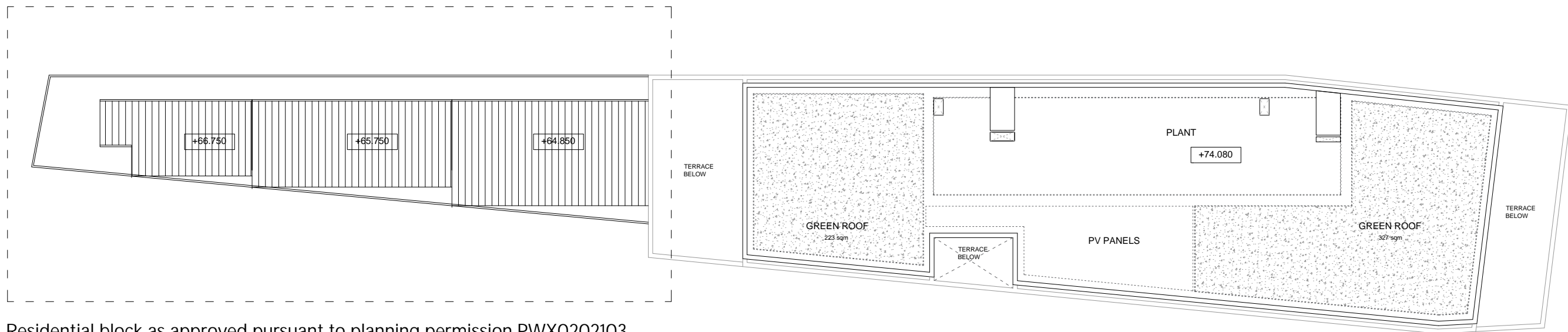
Drawing Title
PRE DEVELOPMENT HABITAT PLAN

Drawn MP	Checked KD	Approved JW	Date 15/08/24
Job No. 22.0068	Scale 1:725	Sheet Size A3	Revision B
Drawing Number BMD.22.0068.DRE.901			



184700

184600



Residential block as approved pursuant to planning permission PWX0202103

GENERAL NOTES:

THIS DRAWING IS COPYRIGHT OF KSR ARCHITECTS. THIS DRAWING MUST BE READ IN CONJUNCTION WITH THE DESIGNER'S RISK ASSESSMENT, SPECIFICATION AND ALL OTHER RELEVANT DOCUMENTATION AND DRAWINGS. KSR ARCHITECTS ACCEPT NO LIABILITY FOR ANY EXPENSE, LOSS OR DAMAGE OF WHATSOEVER NATURE AND HOWEVER ARISING FROM ANY VARIATION MADE TO THIS DRAWING OR IN THE EXECUTION OF THE WORK TO WHICH IT RELATES WHICH HAS NOT BEEN REFERRED TO THEM AND THEIR APPROVAL OBTAINED.
DO NOT SCALE FROM THIS DRAWING OR THE COMPUTER DIGITAL DATA. ONLY FIGURED DIMENSIONS ARE TO BE USED. IF IN DOUBT ASK.

THIS PLAN IS THE ROOF PLAN WITHIN THE APPROVED BLK-P-101 B DRAWING UNDER PLANNING PERMISSION PWX0202103 INSOFAR AS THE RESIDENTIAL BLOCK IS CONCERNED. THE REMAINDER OF THIS PLAN IS THE ROOF PLAN ABOVE THE PROPOSED NEW COMMERCIAL FLOOR SPACE.



ISSUE FOR COORDINATION

KSR ARCHITECTS & INTERIOR DESIGNERS
KSR Architects LLP
14 Greenland Street
London NW10 0ND
info@ksrarchitects.com
t: +44 (0)20 7862 9000
www.ksrarchitects.com

Project:
• 14 Blackburn Road
London
NW6 1RZ

Title:
• PROPOSED
Roof

- ISSUE FOR COORDINATION		14.03.23	DM	SC	Date: MAR 2023	Drawn By: DM	Checked: SC	Project Ref: • 21068	Drawing No: • P-106	Revision: -
Do not scale from this drawing. Check all dimensions on site.					Scale: 1:200 @ A1, 1:400 @ A3					

A. METADATA AND LIMITATIONS

A.1 Metadata

Factor	Detail
Data	Biodiversity Net Gain Calculations
Reason for collection	To provide baseline data to identify a predicted future biodiversity net gain target for development at 14 Blackburn Road, London.
Location	14 Blackburn Road, West Hampstead, London, NW6 1RZ, approximate central grid reference: TQ 25615 84684
Date	August 2024
Method of collection	See Section 2
Assessment completed by	Katie Dalton MRSB ACIEEM
Assessment calculator used	The Statutory Biodiversity Metric (Natural England)
GIS software	ArcGIS Desktop 10.8 & ArcGIS Pro 3.1
AutoCAD software	N/A

A.2 Limitations review

Consideration	Comment
Survey & data	
Personal competence, i.e. qualifications, training, skills, understanding, experience	All assessment works were undertaken by or directly supervised by personnel experienced in biodiversity net gain assessments. <u>Katie Dalton BSc (Hons) MRSB ACIEEM</u> has over 7 years' experience in ecological consultancy, including experience in undertaking a range of surveys and survey techniques, site assessments and technical reporting. Katie holds a level 2 Class licence for bats and GCN. <u>Jonathan Wood BSc (Hons) MCIEEM</u> has over 10 years' experience in ecological consultancy, including experience of performing and coordinating the assessments undertaken. <u>James Patmore CEcol CEnv MCIEEM</u> James has over 21 years of professional experience of ecological and biodiversity surveys and assessments. This has included developing monitoring mechanisms for a range of habitats, assessing impacts of development on biodiversity, undertaking biodiversity net gain calculations for both small sites and large-scale schemes and writing enhancement and mitigation strategies. Attended a number of training courses/conferences on biodiversity net gain delivered by specialist consultants, Natural England and CIEEM. <u>Mark Parnell MRes BSc</u> GIS mapping and area measurements were drawn and calculated by Mark Parnell. Mark has worked as a GIS specialist for more than 14 years, including work for DEFRA.
Resources (equipment and/or personnel)	Appropriate resources and suitably qualified personnel were used.
Time spent surveying	NA
Data (e.g. arising from incomplete or inappropriate surveys)	The data collected was sufficient for the purpose of the works.
Lack of statistical robustness and higher uncertainties	Appropriate statistical analysis of data was applied during this assessment. All uncertainties have been fully acknowledged and duly taken into consideration.
Old and out of date data	All data used is up to date from August 2024.
Timing or seasonal constraints and suboptimal survey periods	N/A
Partial use of and/or departures from good practice guidelines	All assessments accorded with the relevant best practice guidelines.
Site conditions & other factors	
Adverse weather conditions	N/A
Restricted access to site or part of site	N/A
Unrealistic deadlines	No restrictions on survey data collected or analysed to date are as a result of unrealistic deadlines.
Unproven or untested measures for mitigation and compensation	N/A
Evaluation of conservation value and impacts	The evaluation of the conservation value of habitats within the site and impacts of the development, are based on the most appropriate baseline information available.