

Mr. H. Pluckrose  
Gardiner & Theobald LLP  
10 South Crescent  
London  
WC1E 7BD

**By Email:  
6<sup>th</sup> June 2024**

*Report Ref: J21385\_P2*

Dear Mr. Pluckrose,

**Site Reference – Royal Free Hospital, Pond Street, Camden, London, NW3 2QG**

In March 2024, Greenspace Ecological Solutions Ltd (GES) were commissioned to undertake ecological surveys at Royal Free Hospital, Pond Street (hereafter referred to as “the Site”). The surveys were required to inform a planning application for a limited extension to the existing hospital building at second and third storey level.

The Site comprises a three-storey hospital building surrounded by hardstanding. The proposed development will be restricted to works to the existing building, with the construction only affecting existing hardstanding.

Under the Environment Act 2021, all planning permissions granted in England will have to deliver at least 10% biodiversity net gain (BNG) from 12<sup>th</sup> February 2024. BNG will also be required for small sites from 2<sup>nd</sup> April 2024. However, some projects are exempt and do not need to demonstrate or provide net gain. Having reviewed the proposals, the development is considered to be exempt from the mandatory BNG requirement under the ‘de minimis’ rule which states:

*“This exemption applies to development that does not impact a priority habitat and impacts less than 25m<sup>2</sup> (e.g. 5m x 5m) of non-priority on-site habitat or 5m of non-priority on-site linear habitats. This exemption is designed to ensure that BNG does not apply to either very small scale development or development which does not impact habitat through loss or degradation within the redline boundary.”*

The total area to be affected by the proposed development is approximately 0.17ha, and the only habitats within the Site are building and hardstanding, both of which have no biodiversity value. The proposed development will therefore result in no loss of habitat and, consequently, the proposed development does not need to demonstrate or deliver BNG.

I trust that you find the above information of use but if you have any questions then please do not hesitate to contact us.

Yours sincerely,



Chris Bawler ACIEEM BSc (Hons)  
*Senior Ecologist*

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