BIODIVERSITY NET GAIN REPORT

EXECUTIVE SUMMARY

ECOassistance were commissioned to carry out a Biodiversity Net Gain (BNG) assessment for a site known as: Site to the rear of 12 Sarre Road, London, NW2 3SL. The site is to be the subject of an upcoming planning application for:

Erection of a two bed single dwelling facing Gondar Gardens. Under the current proposals minor habitat losses are unavoidable.

The total loss of habitat on site is below 25m². The existing habitat loss comprises modified grassland, introduced shrub and bramble scrub which are considered to be habitats of low distinctiveness. **The habitat losses are therefore within the de minimis threshold and the site is exempt from mandatory biodiversity net gain requirements.**

Despite not requiring a full BNG assessment habitat creation should be incorporated into the design of the proposed scheme to encourage biodiversity on site post development to be in line with National Planning Policy. Embellishments to encourage biodiversity are recommended.

This assessment has been undertaken so that the planning application can be validated.

In accordance with BNG guidance the baseline habitat units for the site have been calculated using the Statutory Biodiversity Metric Calculation Tool. This report utilises Version 1.0.3 of the Statutory Biodiversity Metric Calculation Tool, released on 23/07/24. The biodiversity metric tool has been provided to the client.

A screenshot of the headline results page for the BNG assessment is shown below.



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Habitat units	10.00%	0.01	0.01	0.01		
Hedgerow units Watercourse units	10.00%	0.00	0.00	0.00		
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Client Name:	Mr Pat Butcher	Mr Pat Butcher					
Date of Completion:	11/11/2024						
Date of Site Walkover:	24/10/2024	24/10/2024					
Doc. Version Control:	1.0						
	Name:	Dolor					
	Ivallic.	Role:					
Report Author:	Edward Clark	Principal Ecologist					
Report Author: Report Review:							
	Edward Clark	Principal Ecologist					

This report considers the instructions and requirements of the client and is not intended for and should not be relied upon by any third party.

In accordance with current good practice guidance, the results contained within this report can be relied on for decision-making purposes without the need to be updated for six months providing there is no significant change in land use or land management in that time.

Interpretations and recommendations contained in this report represent the author's professional opinions. They are based on currently accepted industry practices and personal experience. This is a working document and must be updated if development proposals change, or new information become available.



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INTRODUCTION

ECOassistance have been commissioned by Mr Pat Butcher (Hereafter: the client) to undertake a Biodiversity Net Gain (BNG) assessment and to provide outline recommendations for how to achieve +10% BNG through development. The proposed development is to include the construction of a two bed single dwelling at the site to the rear of 12 Sarre Road, London, NW2 3SL (Hereafter: the site).

The site is in West Hampstead in northwest London and falls within the Camden Council Local Planning Authority (LPA). The grid reference for the approximate centre of the site is: TQ 24772 85210.

The site is within a dense residential area. The habitats that are present within the site are consistent with those of the neighbouring properties in the immediate surrounding area.

An overhead satellite image with indicative red line boundary of the site and the habitats it contains, shown within the context of those in the wider area is shown in Figure 1 below.





BNG REQUIREMENTS

Mandatory BNG, as part of the Environment Act (2022), came into place for all minor developments from April 2024. The National Planning Policy Framework (NPPF) states that planning policy should identify and pursue opportunities for securing measurable gains for biodiversity.

The national target for mandatory BNG is 10%, although local targets may differ, and local planning strategies should be consulted. Camden Council LPA indicates that a minimum 10% BNG must be achieved.



The current model for assessing BNG (used in this report) is the Statutory Biodiversity Metric Calculation Tool (version 1.0.3).

MITIGATION HIERARCHY

The Statutory Biodiversity Metric Calculation Tool follows the mitigation hierarchy, which is an important principle of ecological good practice. The mitigation hierarchy prioritises habitat retention and minimising habitat damage so far as possible, before looking to enhance or recreate habitats. This sequential approach is encouraged by the biodiversity metric because it allows overall biodiversity gains to be achieved more easily through the avoidance of on-site habitat losses, rather than relying solely on the creation of new habitat or the enhancement of existing habitat. It works this way because the metric applies multipliers that are based on the risks inherent in creating or restoring habitat, and which are not applicable when existing habitat is safeguarded.

The Biodiversity Metric includes a rule which mandates that lost habitats must be compensated for on a "like for like" or "like for better" basis. As such, new or restored habitats should aim to achieve a higher distinctiveness and/or condition than those to be lost.

STATUTORY OBLIGATIONS

The use of the biodiversity metric does not negate the projects statutory obligations in relation to protected species and habitats.

RELEVANT LEGISLATION AND PLANNING POLICIES

Relevant legislation implications for this site include:

- The Conservation of Habitats and Species Regulations 2010 (as amended);
- The Wildlife and Countryside Act 1981 (as amended);
- The Countryside and Rights of Way Act 2000;
- The Natural Environment and Rural Communities Act (NERC Act) 2006;
- Environment Act (2022).

Planning policies, both local and national, may affect any proposed development. Relevant planning policies to this development include;

- National Planning Policy Framework;
- Local policies

SITE AIMS AND OBJECTIVES

The aim of the BNG assessment is to:



- Provide a baseline assessment of the habitats on the site using the Statutory Biodiversity Metric Calculation Tool.
- Provide a predicted score based on proposed habitat creation and enhancement using the Statutory Biodiversity Metric Calculation Tool.
- Provide suitable long term management recommendations, for the site, to ensure habitats reach and maintain their desired condition.



CONSTRAINTS AND LIMITATIONS

The area measurements are based on QGIS software and georeferenced drawings of the site block plans as provided by the architect.

A Tree Replacement Notice (Tree Preservation Order (TPO) reference H29-T27) has been served at the site following the unlawful removal of an ash tree *Fraxinus excelsior* in June 2020. This is included in the appendix of this report.

The replacement tree has not been included within the BNG baseline assessment because the loss has already been dealt under enforcement with the planting of a suitable replacement tree having already been ordered.



METHODOLOGY

A BNG assessment has been conducted using the free and open-source geographic information system QGIS alongside the Statutory Biodiversity Metric Calculation Tool.

The methodology as set out in the Statutory Biodiversity Metric Calculation Tool User Guide has been followed. The Statutory Biodiversity Metric Calculation Tool converts habitats into 'biodiversity units' which are the 'currency' of the metric.

BASELINE ASSESSMENT

The BNG assessment is based on habitat data collected during a site visit undertaken by Ecologist Edie Burns of ECOassistance Ecologists Ltd. on the afternoon of 24/10/24. The site survey was undertaken in fair weather conditions during daylight hours.

The baseline assessment is calculated by categorising the habitats on site into the corresponding UK Habitat Classification (UKHab) Version 2.0 and feeding these into the metric. The metric then assigns the habitat distinctiveness.

A strategic significance is also assigned to each habitat type. Strategic significance relates to the spatial location of a habitat parcel and works at a landscape scale. It gives additional value to habitats of strategic importance to that local area.

Biodiversity metric uses habitat condition as one of the measures of habitat quality. The condition assessment measures a habitat parcel against the ecological optimum state for that particular habitat. The biodiversity metric provides a list of assessment criteria for each habitat type. The condition of the habitat is then assessed against these criteria; the more criteria present within the habitat the higher the assessed condition.

CALCULATING UNITS

Biodiversity units are calculated using both the size and quality of a parcel of habitat. The metric uses habitat area (measured in hectares) as its core measurement, except for linear habitats (hedgerows and lines of trees and rivers and streams) where habitat length (measured in kilometres) is used.

To assess the quality of a habitat biodiversity metric scores:

- **Habitat type**, such as woodland or grassland, according to their relative biodiversity value or distinctiveness. Habitats that are scarce or declining typically score highly relative to habitats that are more common and widespread.
- Habitat condition, scoring the biodiversity value of the habitat relative to others of the same type.
- Habitat location and connectivity. Being 'better' and 'more joined-up' are important facets of habitats that can contribute to halting and reversing biodiversity declines, so the metric also accounts for whether or not the habitat is sited in an area identified, typically in a relevant local strategy or plan, as being of strategic significance for nature.



PRINCIPLES AND RULES OF THE STATUTORY BIODIVERSITY METRIC

PRINCIPLES

The Biodiversity Metric works under the following principles;

- Principle 1: The metric assessment should be completed by a competent person.
- Principle 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.
- Principle 3: This biodiversity metric should be used in accordance with established good practice guidance and professional codes.
- Principle 4: This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
- Principle 5: Biodiversity units are a proxy for biodiversity and should be treated as relative values.
- Principle 6: This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.
- Principle 7: Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
- Principle 8: Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.
- Principle 9: This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to:
 - maintain habitat extent supporting more, bigger, better and more joined up ecological networks
 - ensure that proposed or retained habitat parcels are of sufficient size for ecological function

RULES

The following rules apply to the Biodiversity Metric;

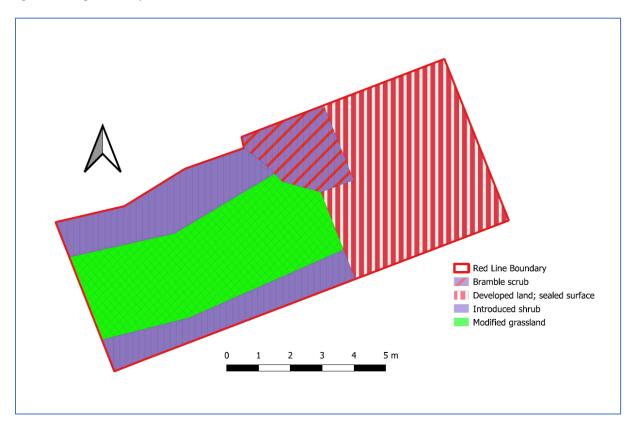
- Rule 1: The trading rules of this biodiversity metric must be followed.
- Rule 2: Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.

- Rule 3: To accurately apply the biodiversity metric formula, you must use the statutory 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.
- Rule 4: In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

BASELINE HABITATS

The location and extent of the habitats within the site are shown in Figure 2 below. These are discussed in more detail in the relevant subsections below.

Figure 2: Existing habitat map



HARDSTANDING (U1B)

The site is accessed via a hardstanding parking area located on the eastern side of the site. The area is demarcated by a close board fence to the south and west side and a brick wall to the north.

MODIFIED GRASSLAND (G4)

Modified grassland which is regularly maintained through mowing is present in the western side of the site. The grassland is part of the rear garden/lawn of 12 Sarre Road.

INTRODUCED SHRUB (H2B)

The northern and southern boundaries of site are planted with a mix of shrubs. These species include: holly *llex aquifolium*, honeysuckle *Lonicera periclymenum*, rose *Rosa rubiginosa*, strawberry *Fragaria* × *ananassa* and camellia *Camellia japonica*. Ivy *Hedera helix* is present along the boundary fence.

BRAMBLE SCRUB (H3D)

Adjacent to the northern boundary against the close board fencing there is a small area (6m²) of bramble *Rubus fruticosus sp.* scrub.

BASELINE ASSESSMENT

The table below summarises the baseline habitat assessment for the site. There are a total of 0.01 habitat baseline units present on the existing site.

Table 2: Summary of BNG baseline assessment

On Site Area H	-labitats					
Broad Habitat	Habitat Type	Area (hectares)	Distinctiveness	Condition	Strategic significance	Total habitat units
Grassland	Modified grassland	0.0022	Low	Poor	Low Strategic Significance	0.0044
Heathland and shrub	Bramble scrub	0.0006	Medium	Condition Assessment N/A	Low Strategic Significance	0.0024
Urban	Developed land; sealed surface	0.0025	V.Low	N/A - Other	Low Strategic Significance	0
Urban	Introduced shrub	0.0016	Low	Condition Assessment N/A	Low Strategic Significance	0.0032
				Baselin	e Habitat Units	0.01

BASELINE IMPACTS

The development will impact 24m² of modified grassland, bramble scrub and introduced shrub habitat which is within the de minimis threshold.

Table 3: Baseline habitats retained/lost

Broad Habitat	Habitat Type	Area (hectares)	Area retained	Area enhance d	Baseline units retained	Baseline units enhance d	Area habitat lost	Units lost
Grassland	Modified grassland	0.0022	0.000935 4	0	0.001870 8	0	0.001264 6	0.002529 2

Heathlan d and shrub	Bramble scrub	0.0006	0.000043 8	0	0.000175 2	0	0.000556 2	0.002224 8
Urban	Developed land; sealed surface	0.0025	0.0025	0	0	0	0	0
Urban	Introduce d shrub	0.0016	0.001019 7	0	0.002039 4	0	0.000580 3	0.001160 6

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On-site po	st-interve	ention	Hedgerow units	0.00		
(Including habitat rete	ntion, creation & en	hancement)	Watercourse units	0.00		
			Habitat units	-0.01		
On-site	net chance	ge	Hedgerow units	0.00		
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(Including habitat rete			Watercourse units	0.00		
Off-site	net chance	ae	Habitat units	0.00		
	& percentage)		Hedgerow units Watercourse units	0.00		
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			Habitat units	0.00		
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			Watercourse units	0.00		
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			Habitat units	-0.01		
	unit cha		Hedgerow units	0.00		
(Including all on-site & off-site ha	abitat retention, cre	ation & enhancement)	Watercourse units	0.00		
m . 1	. 0/ 1		Habitat units	-59.15%		
	et % chan		Hedgerow units	0.00%		
(Including all on-site & off-site ha	abitat retention, cre	ation & enhancement)	Watercourse units	0.00%		
Trading r	Trading rules satisfied?					
Unit Type	Target	Baseline Units	Units Required	Unit Deficit		
Habitat units	10.00%	0.01	0.01	0.01		
Hedgerow units Watergowsco units	10.00%	0.00	0.00	0.00		
Watercourse units	10.00%	0.00	0.00	0.00		



CONCLUSION & RECOMMENDATIONS

BNG DISCUSSIONS

An ash tree was removed from the site in 2020 but as the loss of this tree has already been dealt with through a tree replacement order the tree that was removed has not been included or 'double-counted' in the baseline BNG assessment.

Taking into account the current on site habitats, the on-site habitat losses are to be <25m² and therefore the site meets the de minimis exemption.

The site is therefore exempt from the statutory requirement to provide a scheme which delivers BNG of +10%.

RECOMMENDATIONS

Despite not requiring a scheme to provide BNG of +10% using the statutory metric, habitat creation should be incorporated into the design of the proposed scheme to encourage biodiversity on site post development to be in line with National Planning Policy.

Due to the nature of the proposed development and the immediate surrounding habitats, embellishments such as bat and bird boxes and a hedgehog house are likely to provide the greatest benefit for local wildlife species.

A single hedgehog house can be installed near to the base of a hedgerow on land outside of the development boundary but within the same ownership as the site.

A single bat and bird box can be affixed to the new build property post completion or integrated into the fabric of newly created structures.

Bat and bird boxes should be erected in a sheltered location¹ at between 3-4m height. Care must be taken to provide an unobstructed flight path to the entrances of bat boxes. Examples of suitable bat boxes are provided in the appendix.

The proposed development, if the recommendations are followed, will provide an opportunity for some local biodiversity net gain through development.

¹ For all types of boxes, Collins et al. (2020) found that the box height most frequently occupied was 4m (2020). A height of at least 3 metres is recommended.



REFERENCES

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Draft New Camden Local Plan January 2024

https://www.camden.gov.uk/documents/20142/4820180/Draft+New+Camden+Local+Plan+2024+v1.pdf/41 5cc7da-c24a-8237-ddc2-5c72045af9d2?t=1706548115256

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UK Habitat Classification Working Group. (2023). UK Habitat Classification (UKHab) Version 2.0. [Online]. Available at: https://ukhab.org/



APPENDIX 1: SCREENSHOTS OF BNG METRIC

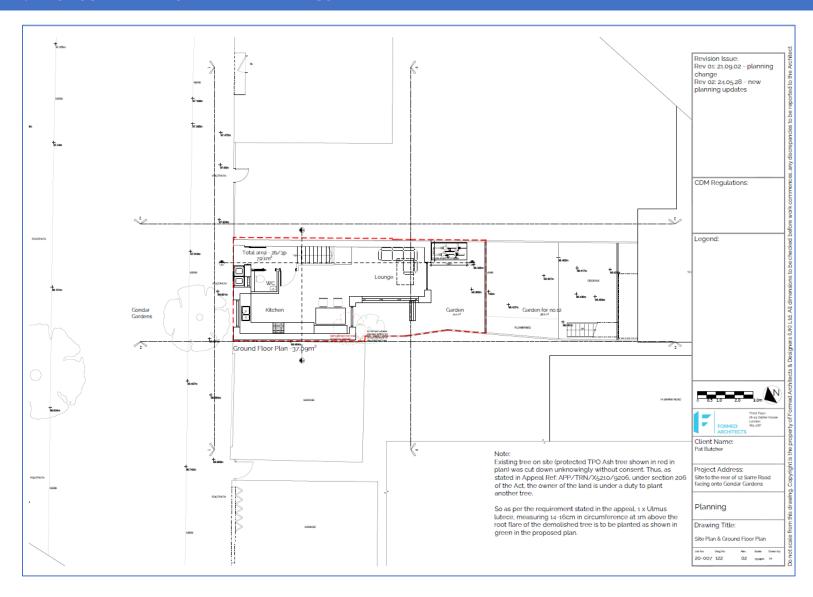
BASELINE HABITATS

	Existing area habitats			Distinctiveness	Condition	Strategic significance		Ecological baseline
Broad Habitat	Habitat Type	Irreplaceable habitat	Area (hectares)	Distinctiveness	Condition	Strategic significance	Required Action to Meet Trading Rules	Total habitat units
Grassland	Modified grassland	No	0.0022	Low	Poor	Area/compensation not in local strategy/ no local strategy	Same distinctiveness or better habitat required ≥	0.00
Heathland and shrub	Bramble scrub	No	0.0006	Medium	Condition Assessment N/A	Ārea/compensation not in local strategy/ no local strategy	Same broad habitat or a higher distinctiveness habitat required (≥)	0.00
Urban	Developed land; sealed surface	No	0.0025	V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	Compensation Not Required	0.00
Urban	Introduced shrub	No	0.0016	Low	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	Same distinctiveness or better habitat required ≥	0.00

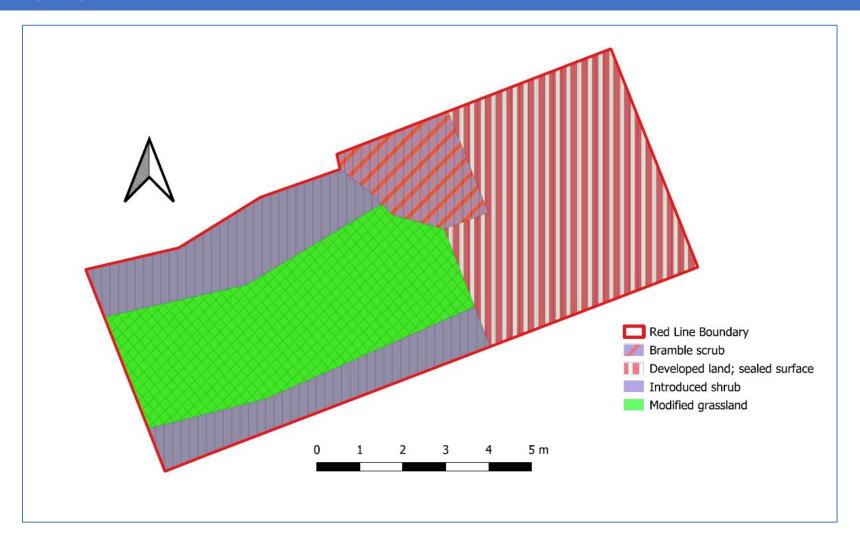
HABITAT CREATION ON-SITE

			Distinctiveness	Condition	Strategic significance	Temporal multiplier		Difficulty	
Broad Habitat	Proposed habitat	Area (hectares) Distinctiveness Condi		Condition	Strategic significance	Standard or adjusted time to target condition	Final time to target condition (years)	Final difficulty of creation	Habitat units delivered
Urban	Developed land; sealed surface	0.0024	V.Low	N/A - Other	Ārea/compensation not in local strategy/ no local strategy	Standard time to target condition applied	0	Low	0.00

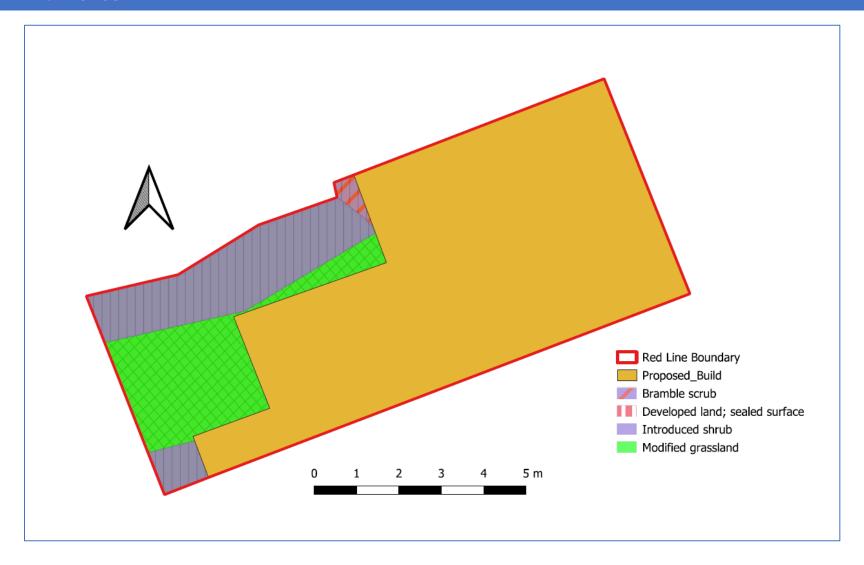
APPENDIX 2: PROPOSED DEVELOPMENT DRAWINGS



APPENDIX 3: BASELINE HABITAT MAP



APPENDIX 4: PROPOSED HABITAT MAP



APEENDIX 3: TREE REPLACEMENT NOTICE & ORDER

London Borough of Camden: Supporting Communities Report of The Director of Supporting Communities

Tree Replacement Notice - TPO ref. H29-T27

Proposed tree replacement notice at 12 Sarre Road, London NW2 3SL

Comments:

In June 2020 an ash tree that is subject to TPO ref. H29-T27 was removed without the necessary consent in place. The owner was subsequently prosecuted.

The owner has a duty to plant a replacement tree in accordance with section 206 of the Town and Country Planning Act. It appears to the council that this duty has not been fulfilled.

Recommendation: That the Head of Legal Services be instructed to issue and serve a tree replacement notice at 12 Sarre Road, London NW2 3SL.

Dan Pope

Chief Planning Officer

TOWN AND COUNTRY PLANNING ACT 1990 section 207

TREE REPLACEMENT NOTICE

Tree Preservation Order Reference H29-T27 (the Order)

LONDON BOROUGH OF CAMDEN (the Council)

IMPORTANT — THIS COMMUNICATION AFFECTS YOUR PROPERTY

THIS IS A FORMAL NOTICE which is served by the Council under the Town and Country Planning Act 1990 (the Act) section 207 because it appears to them that you have not complied with a duty to plant a tree under section 206 of the Act.

The land affected Land at 12 Sarre Road, London NW2 3SL, shown edged red on the attached plan.

Reasons for serving notice: On or around 22 June 2020, an Ash tree protected by the Order was cut down without consent. Under section 206 of the Act the owner of the land is under a duty to plant another tree. It appears to the Council that this duty has not been complied with.

What you are required to do: You are required to plant 1x Ulmus lutece, measuring 14-16cm in circumference at 1m above the root flare at the location shown encircled on the attached plan, annotated as T1.

Time for compliance: SIX (6) months from the date, this notice takes effect.

When this notice takes effect: This notice takes effect on 24 June 2022, unless an appeal is made against it beforehand.

Dated: 12th this day of May 2022

Chief Planning Officer, Supporting Communities on behalf of the London Borough of Camden, Town Hall, Judd Street, London WC1H 8JE

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Authorised by the Council to sign in that behalf



