

Development Planning  
London Borough of Camden  
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c/o Town Hall, Judd Street  
London  
WC1H 9JE

**FAO:** Edward Hodgson

**Our ref:** LEOL/SNE/ASI/U0023985

**Your ref:** PP-13787713

21 February 2025

Dear Sir/Madam

**25-26 Woburn Square, Bloomsbury, London, WC1H 0AA**  
**Town and Country Planning Act 1990 (as amended)**  
**Discharge of Informatives 6 and 7 of Planning Permission Ref. 2024/3681/P**

We write on behalf of our client, University College London ('UCL'), to submit an application to discharge informatives 6 and 7 of Planning Permission Ref. 2024/3681/P in respect of 25-26 Woburn Square, Bloomsbury, London, WC1H 0AA ('the Site').

### **Planning Background**

On 21 November 2024, an application for full planning permission was granted under application ref. 2024/3681/P for the following:

**“Refurbishment and improvements works including replacement of timber window frames, repair works to the roof, refurbishment of front access ramp, installation of platform lifts to the front and rear of the building, installation of ventilation grilles, plant, landscaping, and associated works.”**

On 21 November 2024, an application for listed building consent was granted under application ref. 2024/3698/L for the following:

**“Refurbishment and improvement works, including replacement of timber window frames, repair works to the roof, refurbishment of front access ramp, installation of platform lifts to the front and rear of the building, removal of internal partitions, infill and opening works of internal access, installation of ventilation grilles, plant, landscaping, and associated works.”**

This application seeks to discharge informatives 6 and 7 of Planning Permission Ref. 2024/3681/P to satisfy the Biodiversity Net Gain ('BNG') requirements set out under Schedule 7A of the Town and Country Planning Act 1990 (as amended).

## **Informatives 6 and 7 – BNG**

Informative 6 of Planning Permission Ref. 2024/3681/P states the following:

### **“Biodiversity Net Gain (BNG) Informative (1/2):**

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 (“1990 Act”) is that planning permission granted in England is subject to the condition (“the biodiversity gain condition”) that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.

Based on the information provided, this permission WILL require approval of a BGP before development is begun because none of the statutory exemptions or transitional arrangements summarised below are considered to apply.

### **++ Summary of transitional arrangements and exemptions for biodiversity gain condition.**

The following are provided for information and may not apply to this permission:

1. The planning application was made before 12 February 2024.
2. The planning permission is retrospective.
3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024.
4. The permission is exempt because of one or more of the reasons below:
  - It is not “major development” and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024.
  - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).
  - The application is a Householder Application.
  - It is for development of a “Biodiversity Gain Site”.
    - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding).
  - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).”

Informative 7 of Planning Permission Ref. 2024/3681/P states the following:

### **“Biodiversity Net Gain (BNG) Informative (2/2):**

#### **+ Irreplaceable habitat:**

If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.

#### **++ The effect of section 73(2D) of the Town and Country Planning Act 1990**

If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission (“the earlier BGP”), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.

#### **++ Phased development**

In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.”

As per the requirements set out in Paragraph 14 of Schedule 7A of the Town and Country Planning Act 1990 (as amended), informatives have been imposed on Planning Permission Ref. 2024/3681/P requiring the submission of a Biodiversity Gain Plan for approval by the Local Planning Authority.

In accordance with the requirements set out in informatives 6 and 7, a Biodiversity Net Gain Plan and associated metric has been prepared by MKA Ecology Ltd and is submitted as part of this application for the Council’s consideration.

For the avoidance of doubt, the supporting documents were submitted at application stage and were approved under Planning Permission Ref. 2024/3681/P. The BNG plan and associated metric is therefore being resubmitted to satisfy the requirements of informatives 6 and 7.

#### **Application Documentation**

In accordance with the London Borough of Camden’s validation requirements, the following documents have been submitted in support of the application:

- Completed application form, prepared by Newmark;
- Covering letter, prepared by Newmark;
- Biodiversity Net Gain Assessment, prepared by MKA Ecology Ltd;
- Biodiversity Net Gain Metric, prepared by MKA Ecology Ltd.

The requisite application fee of £145.00 (Plus a Planning Portal admin fee of £70.00) has been paid via the Planning Portal (PP-13787713) at the time of submission.

We look forward to receiving confirmation of registration and validation of this application shortly. In the meantime, should you have any queries, please do not hesitate to contact Sam Neal (020 3486 3312) or Adam Siddiqui (020 7333 6246) of this office.

Yours faithfully



**Adam Siddiqui**  
Planning Consultant

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