

BM Visitor Welcome Pavilion Biodiversity Statement

Prepared for: British Museum Date: April 2025

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INTRODUCTION

- 1.1 The British Museum (hereinafter referred to as the 'Applicant') is seeking full planning permission for the temporary relocation of proposed redevelopment of an area of land contained within the British Museum's South Forecourt, on Great Russel Streat. The site covers a total area of 0.12 hectares (ha) and falls within the administrative boundary of the London Borough of Camdem (LBC).
- 1.2 Currently on site comprises an area of grassland habitat with surrounding pavers and wall, incorporating seating, to provide amenity space outside the British Museum along with hardstanding forming part of the South Forecourt.
- 1.3 The scheme proposals (hereafter referred to as the Proposed Development) is 'the relocation of the South Forecourt bag search facility into a new temporary position on the east lawn of the south forecourt'.







Purpose

1.5 This Biodiversity Statement provides the reporting requirements for biodiversity net gain at the planning stage, establishing the baseline value of the site, details regarding the presence of irreplaceable biodiversity and degradation activities, and outlining the strategy for delivering a policy and legally compliant biodiversity net gain.

Scope

1.6 The Biodiversity Net Gain Appraisal seeks to achieve its purpose by:



- Establishing the biodiversity value of the baseline site in line with the Statutory Biodiversity Metric, considering the three biodiversity unit types (area habitat units, hedgerow units and watercourse units) where applicable to the site;
- Identify whether the site supports irreplaceable biodiversity and whether degradation activities have influenced the site's baseline value;
- Consider the implications of the development upon the baseline site, quantifying the changes to the biodiversity value resulting from the loss or retention of habitats;
- Outline the strategy for the delivery of a biodiversity net gain for the development, considering proposals for the reinstatement of the site and identifying off-site enhancement opportunities to deliver on policy and/or legal requirements.

Declaration of Conformity

- 1.7 The ecological appraisal has been led and carried out by Tom Hall MEnvSci CEnv MCIEEM, who holds over 19 years' professional consultancy experience. Tom holds an undergraduate master's degree in Environmental Science, full membership of the Chartered Institute of Ecology and Environmental Management (CIEEM) and Chartered Environmentalist status.
- 1.8 I can confirm that the information and assessment provided in this Ecological Appraisal is an accurate and realistic assessment of site conditions and potential supporting value, and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. Consideration has been given to best practice guidance in the completion of the appraisal, including British Standard 42020 and appropriate assessment guidance.

Jun for

Tom Hall MEnvSci CEnv MCIEEM.

Period of Validity

1.9 In line with CIEEM guidelines¹, the reporting of the baseline habitats present and their associated condition is valid for a period of 24 months following the completion of the walkover survey on 17th March 2025. The post-development scenario is based on the landscaping and development proposals at the time of writing and remains valid for as long as these are accurate but will require amendment following any revision to these.

LEGISLATIVE AND POLICY CONTEXT

Legislation

1.10 The statutory requirement for biodiversity net gain comes from Schedule 7A of the Town and Country Planning Act 1990, inserted by Schedule 14 of the Environment Act 2021 and enacted by The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024. Through this, unless exempt through the Biodiversity Gain Requirements (Exemptions) Regulations 2024, all developments are required to deliver a minimum 10 % net gain for biodiversity as a condition of planning approval.

CIEEM (2019) Advice Note: On the lifespan of ecological reports and surveys. Chartered Institute of Ecology and Environmental Management, Winchester.



Planning Policy

- 1.11 Biodiversity enhancement is inherent across all levels of the planning process, with the requirement to deliver biodiversity net gain cascading through to local planning requirements. The National Planning Policy Framework (NPPF)² establishes this requirement in Paragraph 193d, whereby "opportunities to improve biodiversity in and around development 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". Further to this, the establishment of coherent ecological networks that provide or increase resilience are identified to form an important part of how planning decisions can contribute to the enhancement of the natural environment.
- **1.12** The London Plan³, which provides strategic planning policy for Greater London, sets out the requirement for biodiversity net gain in Policy G6 where "*development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain*".
- 1.13 The adopted Camden Local Plan⁴, which provides strategic planning policy for the London Borough of Camden, with Policy A3 on Biodiversity identifying that the Council will "assess developments against their ability to realise benefits for biodiversity through layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed". In addition, Camden are currently consulting on a draft Local Plan to replace the adopted Local Plan, with the latest version of the draft New Camden Local Plan⁵ building on the previous plans requirement with Policy NE2 on Biodiversity identifying the Council will expect development to 'realise benefits for biodiversity through their layout, design and the materials used in their built and landscaping elements, taking account of the local ecological context, strategic and local opportunities for biodiversity gains identified in the Council's Biodiversity Strategy and emerging Nature Recovery Network, neighbourhood plans and Local Plan site allocations" and "require biodiversity net gain of at least 10% on eligible sites, with preference for on-site or near site solutions. The net gains will be secured for a period of at least 30 years".
- 1.14 The NPPF is supported by Planning Practice Guidance (PPG), which provides further guidance on the application of planning policy in relation to delivering biodiversity net gain⁶. The PPG on biodiversity net gain sets out the minimum information requirements required to accompany a planning application, although acknowledges that the principles of biodiversity net gain should be embedded into a scheme design, which comprises:
 - confirmation of whether the scheme, if granted permission, would be subject to the biodiversity net gain condition;
 - the pre-development biodiversity value, either on the date of application or an earlier proposed date (with accompanying justification);
 - the completed metric calculation tool setting out the pre-development biodiversity value of the onsite habitat;
 - a statement concerning whether degradation of the onsite habitat has occurred prior to the date on which the baseline was established;
 - a description of any irreplaceable habitat present on the development site; and,
 - a plan, at an appropriate scale and showing the direction of North, of the baseline habitat.

⁶ Department for Levelling Up, Housing and Communities (2024) Planning Practice Guidance.



² Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework. December 2024.

³ Greater London Authority (2021) The London Plan. The Spatial Development Strategy for Greater London, March 2021.

⁴ London Borough of Camden (2017) Camden Local Plan. July 2017

⁵ London Borough of Camden (2024) Draft New Camden Local Plan. Regulation 18 Consultation Version. January 2024.

Principles of Biodiversity Net Gain

- 1.15 The application of the Mitigation Hierarchy is a fundamental element of delivering BNG, ensuring development proposals consider the baseline environment and opportunities to retain habitats where possible and not use the process to justify losses. This requirement is set out in British Standard (BS) 8683⁷, which states that development should:
 - 'first avoid impacts on biodiversity, by identifying all possible avoidance measures especially to avoid impacts on irreplaceable and vulnerable habitats, statutory and non-statutory designated sites and biodiversity of high conservation value';
 - 'then be applied to minimise impacts, before restoring damaged habitats and other ecological features';
 - 'then, as a last resort, offsetting any residual impacts'.
- 1.16 BS 8683 also establishes the 'like-for-like or better' principle as a fundamental element of BNG, whereby a net gain is achieved by 'restoring affected biodiversity or offsetting residual biodiversity loss with the same type of biodiversity (like-for-like) or with a type that is of higher conservation value'. This principle prevents replacement of high value habitat with a greater extent of habitat of lower conservation value.
- 1.17 The Construction Industry Research and Information Association (CIRIA), in partnership with the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA), have produced guidance on biodiversity net gain⁸, setting out good practice principles for the delivery of BNG through development. These principles and how they have been addressed through the assessment are identified in Appendix A.

Ecological Significance

- 1.18 The Local Nature Recovery Strategy (LNRS) for London, a new system of spatial biodiversity strategies in England, is currently being prepared by the Greater London Authority with the aim for London's ecological network to be bigger, better and more joined up. The LNRS is not currently available, with the GLA aiming to complete the strategy by 2025. However, in the absence of the LNRS the GLA identify that the current London and Local Plans should be referenced to inform decision making.
- 1.19 The Local Plan, draft Local Plan and Biodiversity Camden Planning Guidance (CPG)⁹ identify information requirements for planning applications, however they do not identify strategic opportunities for biodiversity enhancement in the borough. Camden's Biodiversity Strategy¹⁰ identifies a series of objectives for enhancement of the borough, including *"increasing opportunities for Camden's residents to experience and learn about the natural environment through volunteering, engagement, access, communication and inclusive and welcoming natural spaces' and 'achieving net gain in biodiversity through planning decisions that are supported by policy and guidance, and identify and deliver opportunities to increase biodiversity in urban areas". However, the strategy does not identify specific opportunities/locations for delivery within the borough.*

¹⁰ London Borough of Camden (2022) Creating space for nature in Camden. January 2022.



⁷ BSI (2021) British Standard 8683:2021 Process for designing and implementing Biodiversity Net Gain – Specification. British Standards Institute, London.

⁸ CIRIA (2019) Biodiversity net gain. Good practice principles for development. A practical guide. CIRIA Report C776a. Construction Industry Research and Information Association, London.

 ⁹ London Borough of Camden (2018) Biodiversity. Camden Planning Guidance. March 2018.

The All London Green Grid (ALGG) Supplementary Planning Guidance (SPG)¹¹ sets out the vision for the ALGG, which is to 'create a well-designed green infrastructure network of interlinked, multipurpose open and green spaces with good connections to the places where people live and work, public transport, the Green Belt and the Blue Ribbon Network'. The SPG sets out the establishment of the eleven Green Grid Area (GGA) frameworks and identifies that they should 'identify objectives and projects, taking into account cross boundary integration and promoting opportunities for improving the provision, quality, functions, linkages, accessibility, design, planning and management of the green infrastructure network'.

The Site falls within the Central London Green Grid (Green Grid Area (GGA) 12), which covers the central boroughs of the CoL, City of Westminster and the boroughs of Kensington & Chelsea, Camden and Hammersmith & Fulham along with parts of the boroughs of Islington, Hackney, Tower Hamlets, Southwark, Lambeth and Wandsworth. The ALGG identifies a single project in the vicinity of the site, comprising the establishment of a greenways network from the British Museum via Covent Garden to the river walking route.

METHODOLOGY

Exemptions

1.20 The proposals, whilst temporary, will have an impact on habitat that exceeds 25 m² of habitat. As a result, the De Minimis Exemption from mandatory BNG does not apply to the application, nor do the other exemptions listed in the secondary legislation. As a result, it is concluded that the application should be subject to mandatory BNG as a condition of planning.

Establishing the Baseline

- 1.21 Habitats present within the survey area, comprising the application site and immediately adjacent habitats, have been classified and mapped following the UK Habitat Classification methodology¹². The UK Habitat Classification methodology is a new comprehensive habitat classification system that was developed to provide greater consistency between applications and, through the combination of primary habitats and secondary codes enable clearer identification of habitat mosaics, management, origins and other environmental and species features associated with primary habitat types.
- 1.22 The methodology is suited to application through both remote-sensing observation and walkover survey mapping, or a combination of both, and is well suited to urban environments as the secondary codes allow for green infrastructure features to be identified and reflect their contribution to biodiversity potential.
- 1.23 The UK Habitat Classification system is hierarchical with the professional edition applied for the assessment requiring habitats to be identified to Level 4 where possible. Considering the scale of the development proposals and urban context of the site, where habitats are often present at limited extent and in contrast to often dominant artificial surfaces, the fine-scale Minimum Mapping Unit (MMU) has been applied, comprising habitats > 25 m² and 5 m length for linear features.

² UKHab Ltd (2023) UK Habitat Classification Version 2.0 (at https://www.ukhab.org)



¹¹ Greater London Authority (2012) Green Infrastructure and Open Environments: The All London Green Grid. March 2012. Greater London Authority, London.

- 1.24 An initial appraisal of the site, using existing site drawings, aerial photography and site images, has been undertaken to establish the habitats present on the site in as much detail as possible. As the site is principally urban in nature, many of the habitats are relatively common and principally fall within the u- urban and u1-built-up areas and gardens categories. Whilst some habitats can only be identified at a high level following this approach and require a walkover survey to accurately identify to Level 4, within the urban categories the distinction between Level 4 habitats, and for developed land Level 5 habitats, is straightforward and achievable.
- 1.25 The initial remote sensing appraisal has been followed up with a walkover survey to ensure the accuracy of the mapping, identify all habitats to Level 4, establish floral species lists for the habitats present and assess the potential for the habitats and any notable features present to support legally protected or ecologically significant species. All habitats have also been attributed relevant secondary codes, where applicable and based on the findings of the walkover survey, to provide additional information on the presence of features and management activities.
- 1.26 In addition to the habitat mapping, habitat condition assessments for those identified in Defra's Statutory Biodiversity Metric are requiring one have also been carried out in the walkover survey. For each habitat requiring a condition assessment, the criteria identified within the methodology¹³ have been considered in turn with appropriate information recorded to confirm the status of each habitat parcel.
- 1.27 The walkover survey was carried out on 17th March 2025 by Tom Hall MEnvSci CEnv MCIEEM, on a sunny and dry day with no cloud cover or rain. Vegetation present was identified, where possible, in accordance with Blamey et al. (2003)¹⁴.

Approach to BNG Assessment

- 1.28 The BNG assessment follows Defra's Statutory Biodiversity Metric, an auditing and accounting tool for biodiversity which comprises the assessment methodology required to demonstrate compliance with the mandatory BNG requirement through the Environment Act 2021. The BNG assessment has been completed using the Statutory Biodiversity Metric calculator¹⁵, in line with the accompanying User Guide¹⁶ and associated information within the Technical Annex¹⁷.
- 1.29 In line with the PPG on Biodiversity Net Gain¹⁸, outlined in Appendix A, as the mandatory requirement for BNG is a condition to planning the information required at the planning application stage is principally associated with the establishment of the baseline. However, in line with Paragraphs 013 and 014 of the PPG, additional information is provided to demonstrate how the proposals will deliver a policy and legally compliant net gain for biodiversity. As a result, the BNG assessment is split into two parts.

Pre-Development

1.30 The ecological value of the baseline habitats has been established from the findings of the walkover survey and habitat mapping, discussed above, with the extent of habitat identified using GIS and, where required, the associated condition score identified in the walkover survey for each habitat or habitat parcel. The only exception for this is the extent of urban trees, for which the tree helper tool within the metric has been used to establish the associated habitat area. This is based on the size classification of the tree, using its Diameter at Breast Height (DBH).

¹⁵ Department for Environment, Food & Rural Affairs (2024) The Statutory Biodiversity Metric. July 2024.

¹⁸ Department for Levelling Up, Housing and Communities (2016) Planning Practice Guidance. Last updated February 2024.



¹³ Department for Environment, Food & Rural Affairs (2024) The Statutory Biodiversity Metric. Technical Annex 1: Condition Assessment Sheets and Methodology.

¹⁴ Blamey, M., Fitter, R. and Fitter, A. (2003) Wild flowers of Britain and Ireland. Domino Books Ltd, Jersey.

¹⁶ Department for Environment, Food & Rural Affairs (2024) The Statutory Biodiversity Metric. User Guide. July 2024.

¹⁷ Department for Environment, Food & Rural Affairs (2024) The Statutory Biodiversity Metric. Technical Annex 1: Condition Assessment Sheets and Methodology.

1.31 Each habitat/habitat parcel has been assigned a 'Strategic Significance', in line with the requirements identified in the User Guide and outlined in Table 1.1.

lable	1.1 Strategic Significance Criteria Considerations				
Category	Criteria where LNRS is Published	Criteria where LNRS is not Published			
High Strategic Significance	 Where there is a published Local Nature Recovery Strategy (LNRS), The location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and, The intervention is consistent with the potential measure proposed for that location. If the project delivers the mapped measure set out in the LNRS or alternative strategy (where the LNRS is not yet available), the assessment should: record the strategic significance as low in the baseline; record that you have applied the published LNRS. 	 The habitat type is mapped and described as locally ecologically important within a specific location, within documents specified by the relevant planning authority. If the project delivers the mapped habitat creation, enhancement or actions set out within specified alternative documents, or enhances an existing habitat identified within specified alternative documents as locally ecologically important, strategic significance can be recorded as high in the post-intervention sheets; If the specified alternative documents identify existing habitat as locally ecologically important within a specified location, strategic significance may be recorded as high in the baseline. 			
Medium Strategic Significance	This category cannot be applied.	 This category can be applied when the LPA has not identified a suitable document for assessing strategic significance. The assessment should: explain how the habitat type is ecologically important within a specific location; demonstrate the importance of that habitat in providing ecological linkage to other strategically significant locations; use professional judgement. When the above criteria are met, strategic significance may be recorded as medium in the baseline and post-intervention sheets. 			
Low Strategic Significance	Where the definitions for high strategic significance are not met. Even if the project is in an area mapped with a potential measure, if it does not deliver the specific actions outlined for your location you should record strategic significance as low.	Where the definitions for high or medium strategic significance are not met.			

 Table 1.1
 Strategic Significance Criteria Considerations

1.32 The Local Nature Recover Strategy (LNRS) is not currently published and the habitats within the baseline are not identified within any Plan or Strategy as holding strategic value for biodiversity. Furthermore, the habitats are highly managed as part of the estate, and as a result do not provide an important habitat locally that provides opportunities for faunal species, instead focusing on providing an amenity resource/value. As a result, the baseline habitats are considered to be of low strategic significance.

Post-Development

1.33 The post-development scenario has been provided to confirm the approach by which the Proposed Development will deliver a BNG, thereby complying with the associated policy and legislative requirements.



- 1.34 The habitat types and extents have been identified based on the landscape information, applying the precautionary principle where uncertainty exists, with the extent measured from the associated areas on the drawings. Where a habitat condition is required, appropriate consideration has been given to the various criteria that apply and recommendations made to ensure the condition assessed can be achieved. In line with the assessment guidelines, trees proposed for installation have been included as small trees, unless appropriate information can be provided to justify the medium size class.
- 1.35 The Strategic Significance has been assessed in line with the information in Table 1.1. The landscape proposals are limited in extent and will form part of the managed amenity resource, thereby limiting the potential value it can provide locally in respect to biodiversity. As a result, in line with the baseline scenario, the post-development habitats are considered to be of low strategic significance.

Limitations

1.36 Ecological surveys inherently provide a snapshot in time, and conditions will change over time that will alter the conditions associated with the features/potential features present or introduce new features. The assessment has been completed at an appropriate time and within suitable timescales, and whilst some aspects may be missed, for example as a result of flowering periods, the information gathered is sufficient to assess the value and associated risks. Furthermore, given the regular and repeated nature of the habitats present, and resultant uniform nature of habitat and limited species establishment, this limitation does not influence the findings of the assessment.

BASELINE

Baseline

1.37 The following sections describe the habitat conditions that were identified in the survey area according to the primary habitat type present in line with the UK Habitat Classification definitions and following CIEEM best practice guidance. The habitat descriptions should be read in conjunction with the UK Habitat Classification survey map, see Figure 1.2, site photographs, see Appendix B.

G4 Modified Grassland

- 1.38 A central lawn occupies the main area of the Application Site, providing an amenity space at the South Forecourt of the museum alongside Great Russell Street. The grassland habitat best fits the modified grassland habitat type within the UK Habitat Classification methodology, with the habitat low in species diversity (fewer than 9 species per m²) and dominated by a few fast growing grasses on fertile, neutral soils.
- 1.39 The grassland habitat is dominated by perennial ryegrass (*Lolium perenne*) and red fescue (*Festuca rubra*) with herbaceous species limited to the occasional presence of daisy (*Bellis perennis*). The habitat is regularly maintained to a short sward commensurate to its amenity purpose, thereby limiting the species diversity within the habitat.
- 1.40 Modified grassland habitat requires a condition assessment as part of the BNG assessment, which is included in Appendix C. The habitat supports fewer than 6 vascular plant species per m² thereby failing Condition Criterion A, and does not support a varied sward height (Criterion B) nor any areas of bare ground (Criterion E), however it does have an absence of scrub (Criterion C), no physical damage (Criterion D), no bracken (Criterion F) and an absence of non-native plant species (Criterion G). However, as compliance with Criterion A is required to achieve a moderate or better condition, the grassland habitat is considered to be of poor condition in respect to the BNG assessment.





Figure 1.2 UK Habitat Classification Map (contains map data from OpenStreetMap)

1.41 As a result of the regular maintenance and resultant short and uniform sward, the habitat has limited supporting potential for faunal species and is not of sufficient diversity to warrant consideration as a Biodiversity Action Plan Priority Habitat. As a result, the habitat is considered to be of biodiversity value within the immediate survey area only.

U1 Built-up Areas and Gardens

U1b Developed land – sealed surface

U1b6 Other developed land

- 1.42 Hardstanding in the form of stone pavers surrounds the East Lawn with a stone wall with incorporated seating surrounding this to enclose the amenity space. The hardstanding of stone pavers extends to the north alongside the main building across the remainder of the eastern part of the red line boundary.
- 1.43 The existing security tent is set on hardstanding on the western part of the red line boundary, comprising a resin bound gravel substrate which extends into the surrounding area. In line with the UK Habitat Classification, as the security tent is a temporary structure it has not been included as a habitat and the underlying habitat included. The security tent comprises a modular marquee structure with metal supports, panel sides and a fabric sloping roof.
- 1.44 Outside of the red line boundary, the immediately adjacent habitat comprises further hardstanding of similar nature. All of the hardstanding habitat was clear of vegetation, and as a result is considered to be of **negligible** biodiversity value.

Baseline Ecological Value

- 1.45 The modified grassland habitat within the baseline requires a condition assessment as part of the BNG assessment, which is discussed in the habitat descriptions above and provided in Appendix D, with the remaining habitat assigned a default habitat condition for the assessment. The strategic significance for the baseline is discussed in Paragraph 1.32, with the habitats considered to be of low strategic significance as a result of the high levels of maintenance and limited connectivity.
- 1.46 As a result, the Proposed Development is assessed as having a baseline biodiversity value of 0.08 habitat units, as identified in Table 1.2. With an absence of hedgerow and watercourse units within the site and zone of influence, these are excluded from the assessment. The full detail is provided in the Statutory Biodiversity Metric calculation which accompanies the planning application.

Habitat	Area (ha)	Distinctiveness	tiveness Condition Strategic Required Action Significance		Baseline Unit Value	
Modified grassland	0.0381	Low	Poor	Low	Same distinctiveness or better habitat required	0.08
Developed land; sealed surface	0.0866	Very Low	N/A	LOW	Compensation not required	0.00

	Table 1.2	On-Site	Baseline	Biodiversitv	Value
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1.47 Irreplaceable habitat is defined in BS 8683:2021 as "habitat that cannot be recreated within a specified time frame because it would be technically very difficult or impossible to recreate taking into account their age, uniqueness, species diversity, rarity and environmental or historical context", with Schedule 1 of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 identifying those relevant. None of these habitats were identified to be present within the Proposed Development site.



- 1.48 The modified grassland habitat within the application site has not been subject to degradation activities beyond the normal maintenance of the habitat. The East Lawn has been managed as part of the British Museum Estate to provide amenity grassland for many years, and is evident through aerial photography since 2002, and potentially as far back as 1945. The habitat has remained in its current condition and maintenance since January 2020, with no degradation occurring and the current condition being representative of the habitat over this period.
- 1.49 The hardstanding areas of the Site have not previously supported landscaping including in the period since January 2020, with the security tent present across this period, and therefore degradation has not occurred in these areas either.

Development Implications

- 1.50 The proposal to relocate the Visitor Welcome Pavilion to the East Lawn will result in the loss of modified grassland habitat in this location. However, the application is for the relocation to be temporary and in place for 18 months only, after which the East Lawn will be reinstated to its current condition.
- **1.51** The reinstatement of habitat will be completed as per the following specification from the British Museum's Landscaping Contractor:

Rotavate east lawn to a depth of 100 mm to break up compacted soil and help assist with drainage, re-level existing site soil to create a flatter surface. Import 2m³ of top quality British Standard sandy loam topsoil supplied in 25kg bags and level over the lawn area creating a smooth final level. Newly imported soil will create a good base for the new turf to root and establish. Ensure imported soil is firm and level across site. Apply Rolawn GroRight pre-turf fertiliser evenly over the lawn area to establish a strong and healthy root growth and fast lawn establishment, GroRight will feed the lawn for up to 4 months. Supply and lay 100m² of top quality Rolawn Medallion turf. Rolawn use the highest quality blend of grass seed, sown on the most suitable soil type, combined with highly evolved growing and harvesting techniques to produce an award-winning turf that provides the most suitable performance for the diverse UK climate. Medallion is the only turf in the world treated with our unique, patented Profresh® system which extends its 'as harvested' freshness, ensuring it arrives with you in prime condition. Topdress fertilise and seed other thinning areas of the lawn where returfing is not required. Cut turf to shape of required lawn area.

- **1.52** The Statutory Biodiversity Metric User Guide identifies that a baseline habitat does not need to be recorded as lost when there are temporary impacts to a habitat and the area can be restored to both:
 - baseline habitat type within two years of the initial impact; and,
 - baseline condition within two years of the initial impact.
- 1.53 Whilst the modified grassland habitat shows a standard time to target condition of 1 year within the Statutory Biodiversity Metric, the reinstatement approach proposed using pre-grown turf and fertiliser to establish a strong and healthy root growth and fast establishment will ensure the above is achieved within two years of the initial impact.
- 1.54 As a result, the Proposed Development does not result in the loss of baseline habitats and thereby has a neutral impact on habitat value.

Enhancement Strategy

1.55 The enhancement strategy for the temporary application requires careful consideration to ensure it can integrate with future proposals for the more permanent visitor welcome facilities that the temporary application facilitates, influencing both what can be established within the development site as well as the time scales in which it can be brought forward.



1.56 Considering the temporary nature of the habitat loss and limited baseline value of the site, the enhancement strategy proposes the provision of a single tree within the South Forecourt to provide the uplift to deliver the required net gain for biodiversity. Full details of the proposal will be coordinated with the subsequent enhancements required to deliver enhancement associated with the permanent facility, however the enhancement will comprise a non-native tree species within a suitably sized planter for the tree planted, of up to approximately 1.8 m² in size, and located between the East Lawn and the main entrance of the British Museum, as identified in green in Figure 1.3.



Figure 1.3 Proposed Location of Tree within Planter on South Forecourt (from Drawing 683-DJA-DR-A-11007)

- 1.57 The condition of the proposed tree has been included in the assessment as poor, with the tree only likely to pass condition criteria associated with the canopy cover (Criterion B). As the tree is non native (Criterion A), not mature (Criterion C), likely to be managed in a way that impacts its canopy (Criterion D), unlikely to contain natural ecological niches (Criterion E) and not oversailing vegetation (Criterion F), the habitat will not pass the associated criteria.
- 1.58 As discussed in Paragraph 1.35, the habitat has been attributed a low strategic significance. As the enhancement provided will need to both avoid creating a hazard during the temporary placement of the Visitor Welcome Pavilion and co-ordinate with subsequent workstreams, a precautionary approach has been taken and a delay to the provision of the tree included in the metric at 10 years (i.e. completion of the enhancement will be provided within 10 years of the initial clearance of the grassland). However, it is the intention of the applicant to complete the enhancement well in advance of this time period.
- 1.59 The enhancement strategy will deliver an increase in biodiversity value of 0.01 habitat units, as summarised in Table 1.3 and detailed in full in the accompanying Statutory Metric Calculator.



		OII-Site Dit		lancement value			
Habitat	Area (ha)	Distinctiveness	Condition	Strategic Significance	Delivery Risk	Time to Condition	Unit Value
Urban tree	0.0041	Medium	Poor	Low	Low	20 years	0.01

Table 1.3 On-Site Biodiversity Enhancement Value

Predicted Change to Biodiversity Value

1.60 The predicted change in biodiversity value as a result of the Proposed Development identifies that, based on the enhancement strategy proposed, the temporary development can deliver a biodiversity net gain that complies with legislative and policy requirements and is proportionate to the nature and scale of the impact. The proposal delivers a net gain of 10.55 %, as identified in Table 1.4, which satisfies the Trading Rules associated with the methodology.

Table 1.4 Change in Biodiversity Value

	Area Habitat Units	Hedgerow Units	Watercourse Units
Baseline Habitat Value	0.08	0.00	0.00
Value of Habitat Lost	0.00	-	-
Value of Habitat Retained	0.08	-	-
Value of Habitat Enhanced	0.00	-	-
Value of Habitat Created	0.01	-	-
Total Post-Development Habitat Value	0.09	-	-
Net Change (Biodiversity Units)	+0.01	-	-
Percentage Net Change	+10.55%	-	-

CONCLUSIONS

- The Proposed Development is not considered to meet any of the exemption criteria set out in The Biodiversity Gain Requirements (Exemptions) Regulations 2024, and is therefore expected to be subject to the Biodiversity Net Gain condition to planning approval;
- The baseline habitat value reflects the urban and highly managed nature of the Site, with modified grassland of poor condition and hardstanding dominating the habitats present with a baseline unit value of 0.08 area-based habitat units;
- The biodiversity assessment is based on the findings of the walkover survey, completed on 17th March 2025. Whilst this is earlier than the application date, changes in the habitat would not be expected in the intervening period as a result of the habitats present and the highly managed nature of the Site;
- Degradation activities have not occurred, with the habitats present in the baseline managed as part of the amenity resource within the British Museum and being managed for this purpose for many years;
- The Site does not support any irreplaceable habitats, including those identified within Schedule 1 of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024;
- A completed Statutory Biodiversity Metric, using the latest version, has been summarised in this report and accompanies the application;
- The Proposed Development sets out how it will deliver a legislative and policy compliant net gain of 10.55 %, complying with the Trading Rules associated with the methodology.



Principle	Application in Practice	How to Address through the Project
Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort compensate for losses that cannot be avoided and, where not possible, offset biodiversity losses by gains elsewhere.	An ecological appraisal has been held at an appropriate time to allow for the implications of the application to be understood and opportunities for enhancement identified. As the proposals do not result in the permanent loss of habitat and only temporarily impact upon a low distinctiveness habitat, ecological input into the layout would not have resulted in a different proposal.
Avoid losing biodiversity that cannot be offset elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve net gain.	The site does not support irreplaceable biodiversity, with the habitat within the application site comprising amenity habitat that holds limited biodiversity value.
Be inclusive and equitable	Engage stakeholders ¹⁹ early, and involve them in designing, implementing, monitoring and evaluating the approach to net gain.	Collaboration between various interested parties in the project team, in particular the project manager, planner, client and ecologist has been held to allow for any opportunities for combined benefits, where available, to be realised through the proposals. The requirements of external stakeholders are well communicated through various strategies and policies, which are referenced where relevant. Consultation has been held with the local authority in relation to BNG, however considering the limited impact associated with the application wider consultation is not considered proportionate.
Address risk	Mitigate difficulty, uncertainty and other risks to achieve net gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any residual risk, as well as compensate for the time between the losses occurring and the gains being fully realised.	The BNG assessment is based on Defra's Statutory Biodiversity Metric, which addresses risk through a series of multipliers. The difficulty of creation/enhancement multiplier addresses the uncertainty in the effectiveness of techniques to create/enhance habitats whilst the time to target condition addresses the time between creation/ enhancement and achievement of the target condition. a precautionary approach has been taken to the temporal risk, as the enhancement seeks to avoid constraining the temporary relocated Welcome Pavilion and coordinate with the future works associated with the permanent solution, with a period of 10 years confirmed to continue to achieve a net gain. However, the applicant intends to complete the planting within this period.
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.	Assessment of the net gain through Defra's Statutory Biodiversity Metric has allowed quantification of the biodiversity value of the baseline and identification of opportunities to deliver a net gain within the wider British Museum site that are appropriate to the nature of the site and proportionate to the application.

APPENDIX A – Delivering the Principles of Biodiversity Net Gain

¹⁹ Stakeholders are defined in the guidance as 'individuals and organisations who are actively involved in the project, or whose interests may be positively or negatively affected as a result of project execution or successful project completion'.

Principle	Application in Practice	How to Address through the Project
Achieve the best outcomes for biodiversity	 Achieve the best outcomes for biodiversity by using 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; Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity. 	Defra's Statutory Biodiversity Metric, on which the assessment is based, addresses the 'like-for-like or better' principle through the application of Trading Rules, which highlights where appropriate compensatory planting is not achieved for particular habitat types. The location of enhancement/compensation measures is considered through the Statutory Metric, adding weight to on-site and local measures compared to off-site measures. As a result, it is advantageous for the project to maximise opportunities for biodiversity on-site or within their Estate where possible. Considering the urban location of the site and scale of proposals, whilst the scheme can deliver a net gain for biodiversity the delivery of proportionate enhancement to the scale of the project is unlikely to influence ecological connectivity.
Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations, i.e. do not deliver something that would occur anyway.	Habitat creation proposals are based on actions that are undertaken to deliver new habitats that seek to provide a net gain that meets statutory and planning requirements whilst remaining proportionate to the application.
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; Supporting local-level management of net gain activities. 	Consideration has been given to ensuring the proposed strategy to deliver BNG is practical for their location/use and resilient to external factors, such as climate change. Considering the setting of the application and listed building status of the British Museum, appropriate consideration is given to ensure the habitats present remain in keeping with its heritage value. This has been achieved through collaboration with the design team, planner and client's representative to ensure proposals are appropriate for their location and purpose. Management forms a significant aspect of BNG, with the Environment Act 2021 requiring habitats created or enhanced to be managed for a minimum period of 30 years. The British Museum is committed to ensuring habitats included within the BNG are subject to appropriate and adaptive management that secures long-term enhancement. As a temporary application for the relocation of the Visitor Welcome Pavilion, the application does not displace any harmful activities.
Optimise sustainability	Prioritise BNG and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	Whilst collaboration can realise mutual benefits through habitat creation, opportunities are limited given the nature and scale of the application and impacts and ensuring enhancement is proportionate to this.
Be transparent	Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	The BNG assessment has been communicated in a clear manner, following the precautionary principle where appropriate and clearly demonstrating how the proposals will deliver on planning policy and legislative requirements to deliver a net gain for biodiversity.

APPENDIX B – Site Photographs



Photo 1: Modified grassland on the East Lawn at the South Forecourt



Photo 2: Modified grassland on the East Lawn





Photo 3: Location of the existing security tent alongside the West Lawn in the South Forecourt



Photo 4: Hardstanding surrounding and underlying the existing security tent.



APPENDIX C – Habitat Condition Sheets



Сс	ondition Sheet: GRASSLAND Hal	bitat Type (low distinctiveness)					
Uł	UK Habitat Classification (UKHab) Habitat Type						
G	Grassiand - Modified grassiand						
On-site or off-site, site name and location British Museum Visitor Welcome Pavilion (Temporary Location) \$			Survey date and Surveyor name	10/05/2025			
None 5 Limitations (if applicable) r			Survey reference (if relating to a wider survey)	-			
Gı	rid reference	TQ 30147 81648	Habitat parcel reference	-			
Ha	abitat Description						
Ar	nenity lawn area comprising the E	ast Lawn at the Main Entrance on Great Russell Street to the Bri	lish Museum.				
<u>uk</u>	had – UK Habitat Classification		Criterian neocod (Vec				
Co	ondition Assessment Criteria		or No)	Notes (such as justification)			
	There are 6-8 vascular plant spe those listed in Footnote 1). Note condition. Where the vascular plant species	cies per m ² present, including at least 2 forbs (these may include - this criterion is essential for achieving Moderate or Good s present are characteristic of medium, high or very high	No	The high level of maintenance of the East Lawn restricts the species that can establish, with a maximum of three species present per m2 falling short of the criterion requirement.			
~	distinctiveness grassland, or ther (excluding those listed in Footnot whether the grassland should ins a grassland is classed as mediur condition sheet.	e are 9 or more of these characteristic species per m ² ie 1), please review the full UKHab description to assess itead be classified as a higher distinctiveness grassland. Where m, high, or very high distinctiveness, please use the relevant					
в	Sward height is varied (at least 2 7 cm) creating microclimates whi and breed.	0% of the sward is less than 7 cm and at least 20% is more than ch provide opportunities for vertebrates and invertebrates to live	No	The East Lawn is regularly maintained to a short and uniform sward.			
с	Any scrub present accounts for lo such as bramble Rubus fruticosu	ess than 20% of the total grassland area. (Some scattered scrub is agg. may be present).	Yes	No scrub present.			
	Note - patches of scrub with cont relevant scrub babitat type	tinuous (more than 90%) cover should be classified as the					
	Toloran coras hashar (jpc.			No observations down and a second			
D	Physical damage is evident in les damage include excessive poach high levels of access, or any othe	is than 5% of total grassland area. Examples of physical ing, damage from machinery use or storage, erosion caused by er damaging management activities.	165	no priysical damage present.			
E	Cover of bare ground is between concentration of rabbit warrens) ²	1% and 10%, including localised areas (for example, a	No	There is no bare ground present.			
F	Cover of bracken Pteridium aquil	<i>inum</i> is less than 20%.	Yes	There is no bracken present.			
G	There is an absence of invasive	non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Yes	There are no invasive non-native species present.			
		Essential crite	rion achieved (Yes or No)	NO			
		1	lumber of criteria passed	4			
Co	ondition Assessment Result (out	Condition Assessment Score	Score Achieved ×/√				
Pa pa	asses 6 or 7 criteria including assing essential criterion A	Good (3)		1			
Pa pa	asses 4 or 5 criteria including assing essential criterion A	Moderate (2)					
Pa Ol Pa	asses 3 or fewer criteria; R asses 4 - 6 criteria (excluding	Poor (1)	Y				
CI	Suggested anhancement interventions to improve condition score						
31	nggested ennancement mervenn	ions to improve condition score					
Footnotes							
Fc Ur	Footnote 1 – Creeping thistle Cirsium arvense, spear thistle Cirsium vulgare, curled dock Rumex crispus, broad-leaved dock Rumex obtusifolius, common nettle Urtica dioica, creeping buttercup Ranunculus repens, greater plantain Plantago major, white clover Trifolium repens and cow parsley Anthriscus sylvestris.						
Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.							
Fc ap	Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.						

Footnote 4 – Wildlife and Countryside Act 1981 (as amended).

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