AtkinsRéalis

Biodiversity Net Gain Baseline Report

Ministry of Housing, Communities and Local Government

April 2026

100122279-ATR-XX-EC-0002

GRENFELL TOWER

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Proposed Scheme	The Proposed Scheme comprises the sensitive works to carefully take down Grenfell Tower. The basement will be retained and protected with a waterproof topping. An access point will be provided to ensure safe access into the existing (retained) basement. The non-urgent Crown Development application for full planning permission is sought for the following description of development: *'The works to take down Grenfell Tower'*.
Desk studies and field surveys	A desk study was undertaken in April 2021 and updated in January 2026. Field surveys were undertaken on 24/03/2021, with updated surveys undertaken on 08/01/2026 and 30/01/2026.
Irreplaceable habitats	There are no irreplaceable habitats present on Site.
BNG Metric	The Site is 0.51 hectares in size and is formed of the following area habitats which: ▪ Artificial unvegetated, unsealed surface; ▪ Developed land; sealed surface; ▪ Ruderal/ephemeral; and ▪ Urban trees. There are 0.85 habitat area units within the Site, of which 0.73 units will be retained.
Further considerations	The Ministry of Housing and Local Government (MHCLG) must deliver a mandatory 10% increase in biodiversity value relative to the pre-development biodiversity value of the development site. Based on the baseline and retention of area habitats as detailed within this report, the Proposed Scheme has a baseline of 0.85 area units, with habitat retention of 0.73 units. This results in a loss of -0.12 area habitat units and a -13.90% net change in area habitats. In order for MHCLG to achieve 10% net gain, a 0.20 unit deficit must be addressed to increase the total area habitat units to 0.93. The interventions should also meet trading rules, which could be achieved by including a minimum of 0.10 units of the deficit being met through planting or enhancing individual trees or habitat of a higher than medium distinctiveness. To address the 10% net gain target, MHCLG is to consider the potential of delivering this through registered off-site biodiversity gains or statutory biodiversity credits. In addition to this, MHCLG is in discussions with schools local to the Site to explore opportunities for tree planting as a bonus scheme outside of the mandatory 10% BNG scope, to ensure local communities benefit. The management of these additional trees would be secured through an agreement between MHCLG and the relevant schools. Details of specific potential net gain opportunity sites are not provided within this report.

1. Introduction

1.1 Terms of Reference

This biodiversity net gain (BNG) baseline report (hereby referred to as the 'Assessment') has been prepared by AtkinsRéalis UK Limited on behalf of our client, the Ministry of Housing, Communities and Local Government (MHCLG) (the 'Applicant'), to support a non-urgent Crown Development application for full planning permission in respect of Grenfell Tower, Grenfell Road, North Kensington, London, W11 1TG (the 'Site'). The 0.51-hectare (ha) Site is located within the Royal Borough of Kensington and Chelsea (RBKC) and is shown on the Site Location Plan in **Figure A-1** in **Appendix A**.

The Site is now classified as 'Crown land', as land in which MHCLG has a relevant interest. MHCLG and the Secretary of State are responsible for its maintenance.

This application for Crown Development is submitted pursuant to section 293D of the Town and Country Planning Act 1990 (as amended).

MHCLG's appointed Principal Contractor is currently carefully and sensitively taking down Grenfell Tower (the 'Tower'). These works are being conducted under permitted development (PD) rights granted to the Applicant by Part 19 Class Q of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015. These PD rights cannot be relied upon after 12 months (as stated by the conditions of the PD rights). This application aims to secure the necessary consent to complete the works, noting that this does not include the basement. Notification to utilise these PD rights was issued by MHCLG on 23/09/2025. Consequently, the 12-month period ends on 23/09/2026.

This report is intended as information for the MHCLG and the RBKC in relation to the current application for Crown Development to allow the sensitive works to carefully take down Grenfell Tower. Therefore, this report is provided to inform MHCLG's requirements to deliver a mandatory 10% increase in biodiversity value relative to the pre-development biodiversity value of the Site.

The report provides an assessment of baseline biodiversity of the Site, as a result of the Proposed Scheme, from a pre-development baseline. It follows the framework set out by the Chartered Institute of Ecology and Environmental Management (CIEEM)[1] for reporting in relation to BNG. The assessment has been undertaken by a competent person with reference to the British Standard BS 8683:2021[2].

1.2 The Site

The Site is centred at Ordnance Survey national grid reference (OSNGR) TQ 23908 80963, located within the RBKC in Greater London. The Site includes the Site of Grenfell Tower and associated public areas. It is shown on the Site Location Plan provided in **Figure A-1** in **Appendix A**.

[1] CIEEM (2021). Biodiversity Net Gain Report and Audit Templates. Chartered Institute of Ecology and Environmental Management, Winchester, UK.

[2] The British Standards Institution 2021. BS 8683:2021 Process for designing and implementing Biodiversity Net Gain – Specification. BSI Standards Limited 2021.

The wider landscape is predominantly urban residential development of North Kensington, Notting Hill and Holland Park. The A40 dual carriageway lies approximately 200 m to the north and A3220 to the west, separating the residential areas from a retail and an industrial complex further west.

The Site is 0.51 ha and comprises the Grenfell Tower and surrounding hardstanding. The Site is currently being maintained by the MHCLG whilst the building is being carefully taken down and until the long-term future of the Site is determined.

Within this report, any use of the term ‘on-site’ refers to the Site as described above, i.e. all land within the planning red line boundary of the Proposed Scheme. Any reference to ‘off-site’ is to any land outside of the Site (regardless of proximity or ownership), which may be considered in the assessment if meeting the biodiversity gain objective cannot be achieved through gains within the Site.

1.3 The Proposed Scheme

The Proposed Scheme comprises the sensitive works to carefully take down Grenfell Tower. The basement will be retained and protected with a waterproof topping. An access point will be provided to ensure safe access into the existing (retained) basement.

The non-urgent Crown Development application for full planning permission is sought for the following description of development:

> *‘The works to take down Grenfell Tower’.*

The sensitive works to carefully take down Grenfell Tower are being carried out using the best practicable means, in accordance with BS:6187:2011 and the Code for Demolition at all times. This includes specialist deconstruction equipment, diamond drilling and wire sawing, coupled with traditional deconstruction methods. All works are supported by a luffing jib tower crane located to the north-east of the building.

Larger building elements, including columns, spandrel panels/deep beams, roof-level crown and sections of the existing floor slab, are wire-sawn, detached, lifted down with the crane, then removed from the Site to suitable storage or laid to rest. Smaller materials are transported vertically within the structure, brought out using bobcat shovels, and removed from the Site.

1.4 Relevant Legislation and Policy

1.4.1 Legislation

The Environment Act was given royal assent in November 2021. This is an act to make provision about targets, plans and policies in relation to the environment, including Part 6 of the Environment Act 2021 ‘nature and biodiversity’, which allows for biodiversity gain in planning.

In England, Schedule 14 of the Environment Act 2021 makes provision for a 10% biodiversity gain to be a condition of planning permission through amendment of the Town and Country Planning Act 1990. It also makes provision for habitat creation and enhancements to deliver biodiversity gain to be maintained for a period of at least 30 years after the development is completed. Schedule 14 of the Environment Act 2021 was brought into force in 2024; BNG is now mandatory under Schedule 7A of the Town and Country Planning Act 1990 for most types of development. A summary of relevant BNG legislation is provided in Appendix B.

The Proposed Scheme is within the scope of mandatory BNG.

The MHCLG, as a public body, has a duty to conserve biodiversity under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (as amended).

The introduction of the Environment Act 2021 strengthens this biodiversity duty by amending Section 40 of the Act 2006 so that public bodies also have a duty to enhance biodiversity. Public bodies must now:

- Consider what they can do to conserve and enhance biodiversity.
- Agree policies and specific objectives based on their consideration.
- Act to deliver their policies and achieve their objectives.

1.4.2 Policy

1.4.2.1 National Policy

The National Planning Policy Framework (NPPF)[3] "*provides a framework within which locally-prepared plans can provide for housing and other development in a sustainable manner*". It emphasises the importance of protecting and enhancing the natural environment. In relation to BNG, the NPPF states the following:

- Paragraph 187 (d) *Planning policies and decisions should contribute to and enhance the natural and local environment by:*
  - Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure*s and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.*
- Paragraph 192 (b) *To protect and enhance biodiversity and geodiversity, plans should:*
  - *Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*
- Paragraph 193 (d) *When determining planning applications, local planning authorities should apply the following principles:*
  - *Development whose primary objective is to conserve or enhance 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.*

1.4.2.2 Local Policy

At present, there are no net gain targets above 10% set within The Greater London Authority Environment Strategy[4]. Furthermore, within the RBKC local plan and there is no policy wording which creates substantive changes from the statutory framework for BNG. However, relevant RBKC policy relating to biodiversity is detailed in Appendix B, including:

- RBKC Green Plan[5]: Protecting and Enhancing Biodiversity;

[3] Ministry of Housing, Communities & Local Government. *National Planning Policy Framework*. MHCLG, December 2024.

[4] Greater London Authority (2018). London Environment Strategy May 2018. Available at: london_environment_strategy.pdf. Accessed 16/01/2026.

[5] The RBKC Green Plan 2022 - 2027. Available at Biodiversity Action Plan 2022 -2027. Accessed 15/01/2026.

- RBKC New Local Plan, July 2024[6];
  - Policy GB14: Green and Blue Infrastructure;
  - Policy GB15: Parks, Gardens and Open Spaces; and Policy GB16: Trees.

1.5 Scope of the Assessment

Biodiversity metrics provide a way of measuring and accounting for biodiversity losses and gains resulting from development and/or land management change.

The Assessment quantifies the baseline biodiversity value of land within the Site (using habitat as a proxy and measured in biodiversity units) and quantifies the habitats to be lost and retained. The Proposed Scheme involves the works to carefully take down the Tower only. The MHCLG has a requirement to deliver a mandatory 10% increase in biodiversity value relative to the pre-development biodiversity value of a development site. An increase in biodiversity value could be achieved through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits. No post-development calculations have been completed other than the value of retained habitat.

The assessment is based on the understanding that all trees (except for four that have already been felled) are to be retained, and that all other habitats are to be lost, as detailed within the Deconstruction Environmental Management Plan[7].

The Statutory Biodiversity Metric[8], hereafter referred to as 'the Metric', has been used to calculate the baseline biodiversity units. The Metric is provided as a separate Excel file: '100122279-ATR-XX-EC-0003 - Biodiversity Net Gain - The Statutory Metric 1.0.4.xslx.'

The Metric User Guide[8] sets out four rules in Table 2 of the guide that must be followed in applying the Metric; BNG cannot be claimed if the rules are not followed. Where appropriate to the assessment, these rules are discussed in the relevant sections of this report.

[6] RBKC (July 2024). RBKC New Local Plan, July 2024. Available at: RBKC Local Plan 2024 Clean Version. Accessed 15/01/2026

[7] Deconstruct UK (2025). Deconstruction Environmental Management Plan. Grenfell Tower. Rev 02.

[8] www.gov.uk. 2024. Statutory biodiversity metric tools and guides. [online] Available at: Statutory biodiversity metric tools and guides - GOV.UK [Accessed 12/12/2025].

2. Methods

2.1 Desk Study

2.1.1 Irreplaceable Habitats, Protected Sites and Priority Habitats

A desk study was undertaken in April 2021 and updated in January 2026 to inform the Preliminary Ecological Appraisal (PEA)[9] of the Proposed Scheme. In relation to this BNG baseline assessment, the desk study was used to identify any important ecological features (e.g. irreplaceable habitats, statutory designated nature conservation sites, priority habitats), which may influence the feasibility of delivering BNG, within and adjacent to the Site.

To identify any of these features, the following online data sources were accessed:

- Multi-Agency Geographic Information for the Countryside (MAGIC)[10];
- Ancient Tree Inventory[11].

2.1.1.1 Irreplaceable Habitats

Impacts to irreplaceable habitats are not adequately measured by the Metric and they require separate consideration outside of the statutory framework for BNG, which complies with relevant policy, legislation and regulations. The statutory biodiversity gain objective is not applied to losses or deterioration of irreplaceable habitat. The list of irreplaceable habitats considered within the statutory framework for BNG, as set out in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, is provided in **Table B-1**.

2.1.1.2 Protected Sites

Development on statutory designated sites for nature conservation (e.g. Sites of Special Scientific Interest) is not exempt from the statutory biodiversity gain objective. However, development needs to be compliant with relevant policy and guidance to prevent BNG being used as a justification for otherwise unacceptable development on such sites, i.e. there needs to be strict adherence to the mitigation hierarchy and development will not be consented on the justification that habitat losses can be easily offset using the BNG approach.

2.1.1.3 Priority Habitats

The NPPF[3] promotes the conservation, restoration and enhancement of priority habitats. These are habitats that have been deemed to be of principal importance for the purpose of conserving biodiversity and have been identified as such by being listed on Section 41 of the NERC Act 2006; the relevant planning authority will take their presence into account in their planning decision making.

[9] AtkinsRealis (2026). Grenfell Tower Preliminary Ecological Appraisal. 100122279-ATR-XX-EC-0001. v1.

[10] magic.defra.gov.uk. 2024. Magic Map Application. [online] Available at: https://magic.defra.gov.uk/MagicMap.html [Accessed 08/01/2026].

[11] ati.woodlandtrust.org.uk. 2025. Ancient Tree Inventory – Woodland Trust. [online] Available at: https://ati.woodlandtrust.org.uk/ [Accessed 08/01/2026].

2.1.2 Strategic Significance

The Metric applies a strategic significance score based on whether the location of a site and/or the baseline habitats present within a site or proposed habitat interventions have been identified as being locally important for biodiversity. The relevant Local Nature Recovery Strategy (LNRS)[12] should be used to assign strategic significance.

In line with the LNRS[12], all habitats within the Site at the baseline are considered to be of low strategic significance as the habitats at the Site are not targeted by a local strategy.

The LNRS should be used to determine the strategic significance of any habitat creation or enhancement proposals to deliver BNG.

2.2 Baseline Conditions

A field survey to record habitat types was undertaken on 24/03/2021, with updated surveys undertaken on 08/01/2026 and 30/01/2026. The survey comprised identifying the habitats present within the Site, using the classification system that the Metric predominantly uses for area habitats and hedgerows (the UK Habitat Classification (UKHab)[13]), and undertaking a condition assessment of each habitat. Condition assessment scores were assigned using professional judgement and the criteria for 'good', 'moderate', or 'poor' condition as set out in the relevant condition assessment sheets (in Technical Annex 1 of the Metric User Guide[8]).

The survey was led by a suitably experienced AtkinsRéalis ecologist who has appropriately evidenced their competency as being capable in the identification of habitats and plant species in accordance with the CIEEM Competency Standard for Preliminary Habitat Survey[14]. Surveyors ensured that any habitats considered to be irreplaceable, including ancient and veteran trees, (see **Table B-1**) were identified and recorded.

The survey data was collected using ESRI ArcGIS FieldMaps and then exported and analysed using QGIS. GIS specialists processed the habitat mapping data to remove small overlaps and gaps between polygons that result from digitising at low resolution. The habitat survey data was then clipped to exclude habitat data outside of the Site boundary. Using QGIS, areas (measured in hectares) were calculated for each area habitat feature and, where present, lengths (measured in kilometres) were calculated for hedgerow and watercourse features. Habitat parcels were then created, linking areas/lengths of habitat of the same distinctiveness, condition and strategic significance.

To calculate the area of any individual trees within the Site, the 'tree helper' tool embedded within the Metric was utilised. This tool calculates the projected area of individual trees according to their size (small, medium, or large) measured as 'diameter at breast height' (i.e. diameter measured at 1.5 m above ground).

The method for assigning baseline strategic significance is set out in **Section 2.1.2**.

2.3 Calculating BNG Units using the Metric

For the purpose of using the Metric, the UKHab habitats classified during the field survey were converted to the Metric habitat types.

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[12] London City Hall (2026). London Local Nature Recovery Strategy (LNRS) (March 2026). Available at: Local Nature Recovery Strategy | London City Hall. [Accessed 27/03/2026].

[13] UKHab Ltd (2023). *UK Habitat Classification Version 2.0 (at https://www.ukhab.org)*

[14] CIEEM (2023). Competency Standard for Preliminary Habitat Survey Version 2. [online] Available at: https://cieem.net/wp-content/uploads/2023/03/Preliminary-Habitat-Survey-Competency-Standard-V2-February-2023.pdf

The Metric uses several measures to quantify baseline biodiversity value for each habitat type within a site boundary. These measures include the habitat's distinctiveness (a measure based on the type of habitat and its distinguishing features), its condition (a measure of the habitat against its ecological optimum state) and its size (ha for area habitat/km for linear habitat). In addition, the local strategic significance of a site and/or the habitats within it is taken into account by applying a strategic significance multiplier.

Area habitat units, hedgerow units and watercourse units are calculated in separate modules of the Metric (note, only area units are applicable for the Site). Rule 2 in Table 2 of the Metric User Guide states "*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.*"

A habitat's distinctiveness score is derived from its intrinsic biodiversity value, reflecting species richness and rarity, the extent to which it is protected by designations and the degree to which it supports species rarely found elsewhere. This score is pre-assigned in the Metric.

To calculate the overall net change in biodiversity units, the baseline biodiversity units are subtracted from the post-development biodiversity units, as shown in **Figure 2-1**.

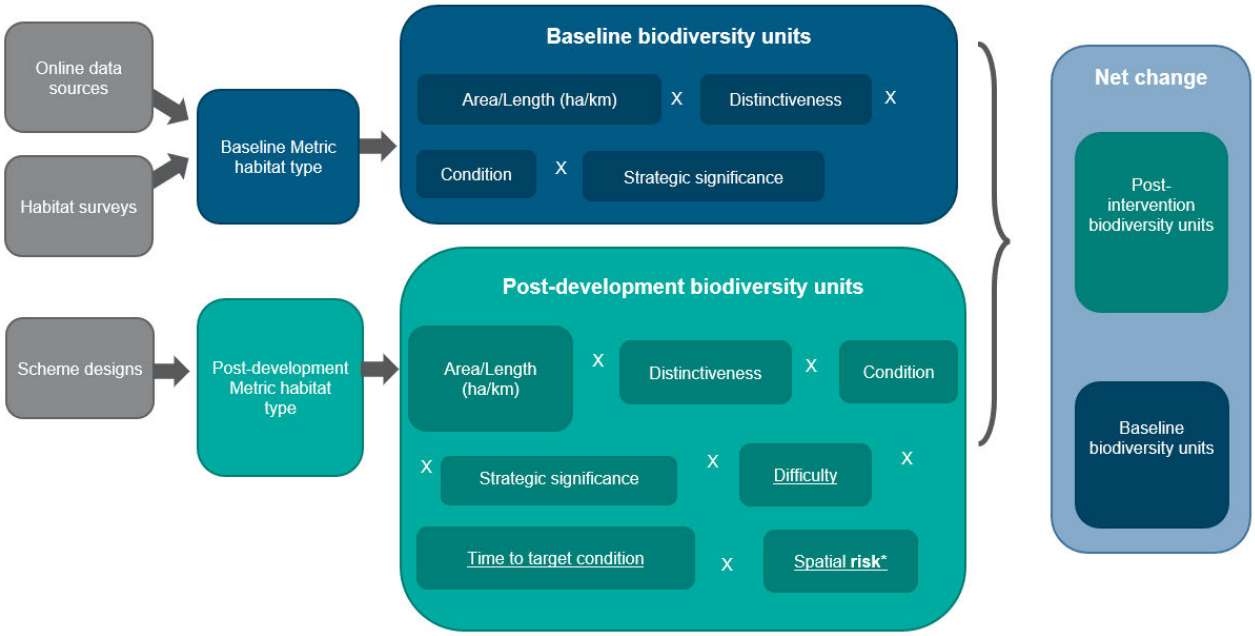


Figure 2-1 – Calculation of Biodiversity Units using the Metric

NB. Illustration does not fully depict calculation of watercourse units; additional multipliers taking into account watercourse and riparian encroachment are applied.
Text underlined indicates a risk factor applied when creating or enhancing habitats.
*Applies to off-site habitat interventions only.

There are no hedgerow features or watercourse features within the Site; therefore, only the area habitat module of the Metric has been used in this assessment.

This report provides only the baseline number of units. No post-development calculation has been undertaken at this stage.

2.4 Assumptions and Limitations

The desk study search for irreplaceable habitats (including ancient and veteran trees) and priority habitats used online sources as set out in **Section 2.1.1**. These datasets are not entirely accurate and some irreplaceable or priority habitats that are present on Site may not be present in the datasets. The field survey aimed to search for these features; as such, this is not considered to be a significant constraint.

The UKHab survey was undertaken on 24/03/2021. Since this visit, some of the habitats present have been lost/degraded. As a result, and in line with the BNG degradation principle[15], where habitats were found to have been lost/degraded during the update survey undertaken on 08/01/2026, the habitat type and condition as identified in 2021 have been used for the purpose of this assessment.

The UKHab survey was conducted in March 2021 and then updated in January 2026, which are both outside the optimal season for habitat survey (April to September), as many plant species may be difficult to identify outside of this period. However, taking into account the common and widespread habitats within the Site, important plants or habitats are not expected to be present, so this is not considered a significant limitation.

While a number of individual trees fall within the Site as part of the baseline, any trees with a diameter at breast height of less than 7.5 cm have been excluded from the baseline calculation, in line with the Metric guidance.

As detailed within the Deconstruction Environment Management Plan, it is assumed that all trees (except for four that have already been felled) are to be retained, and that all other habitats are to be lost[7].

[15] Biodiversity net gain - GOV.UK

3. Baseline Conditions

3.1 Desk Study

3.1.1 Irreplaceable Habitats, Protected Sites and Priority Habitats

There are no irreplaceable habitats, priority habitats or designated statutory or non-statutory sites for nature conservation within the Site.

3.1.2 Strategic Significance

In line with the LNRS[12], all habitats within the Site at the baseline are considered to be of low strategic significance.

3.2 Baseline Biodiversity Value

The following sections summarise the area module (no hedgerow or watercourses are present within the Site) pre-development (baseline) biodiversity value of the Site. The Site has been undergoing active management and continued works since 2017. There is no indication that unauthorised activities have been undertaken at the Site between 30/01/2020 and the date of the application, however, there is some evidence of habitat degradation in line with continued use/management of the Site. As such, and as stated in the limitations above, where habitat degradation has been noted between the 2021 and 2026 surveys, habitat types and conditions recorded during the 2021 survey were used and assigned for the purpose of the baseline assessment.

3.2.1 Area Habitat Baseline

The area habitat baseline of the Site is summarised in **Table 3-1.** The area habitat features present within the Site are shown on the Habitat Baseline Plan provided in **Appendix D**. Condition assessment sheets, where required, are provided in **Appendix E**. These provide summary descriptions of the area habitat features present and the results of their condition assessment.

Table 3-1 – Area Habitat Baseline (Metric habitat types)

Broad habitat	Habitat type	Irreplaceable habitat	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat units
Urban	Artificial unvegetated, unsealed surface	No	0.09	Very low	N/A - other	Area/compensation not in local strategy/ no local strategy	0.00
Urban	Developed land; sealed surface	No	0.41	Very low	N/A – other	Area/compensation not in local strategy/ no local strategy	0.00
Sparsely vegetated land	Ruderal/Ephemeral	No	0.01	Low	Poor	Area/compensation not in local strategy/ no local strategy	0.02
Individual trees	Urban tree	No	0.125[16] (12x small trees, 1x very large tree)	Medium	Poor	Area/compensation not in local strategy/ no local strategy	0.50
Individual trees	Urban tree	No	0.041 (2x small trees, 2x moderate trees)	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	0.33
Total habitat area (ha)			0.68				
Total Site area (excluding area of individual trees, green walls, intertidal hard structures)			0.51				
Total habitat units							0.85

[16] The Metric allows the value of individual trees to be measured and has a 'tree helper' function to automate an area calculation that can be used in the Metric. This area is not included in the total Site area.

3.3 Habitat Retention

As detailed within the Deconstruction Environment Management Plan, it is assumed that all trees (except for four that have already been felled) are to be retained, and that all other habitats are to be lost[7].

3.3.1 Area Habitat Retention

A summary of area habitat retention[17] is provided in Table 3-2.

Table 3-2 – Area Habitat Retention/ Enhancement

Habitat type	Area retained (ha)	Baseline units retained	Area lost (ha)	Habitat units lost
Artificial unvegetated, unsealed surface	0	0.00	0.09	0.00
Developed land; sealed surface	0	0.00	0.41	0.00
Ruderal/Ephemeral	0	0.00	0.01	0.02
Urban tree	0.117	0.47	0.01	0.03
Urban tree	0.033	0.26	0.01	0.07
Total	0.15	0.73	0.53	0.12

[17] Habitat retention is when there is no loss of habitat, when habitat is retained in its baseline condition, and when there is no action to enhance the habitat.

4. BNG Metric

4.1 Habitat Trading

The following section identifies whether habitat trading rules have been met.

4.1.1 Area Habitat

4.1.1.1 Very High and High Distinctiveness Habitat

The Proposed Scheme does not result in the loss of very high or high distinctiveness habitat.

4.1.1.2 Medium Distinctiveness Habitat

The Proposed Scheme will currently result in the loss of -0.10 units of ‘individual trees - urban’. To ensure that future development at this Site aligns with the BNG habitat trading rules, loss of this habitat type will need to be addressed by the provision of a minimum of 0.10 units of the same broad habitat (individual trees) or habitat of a higher distinctiveness.

4.1.1.3 Low Distinctiveness Habitat

The Proposed Scheme will result in the loss of -0.02 units of ‘sparsely vegetated land - ruderal/ephemeral’. To ensure that future development at this Site aligns with the BNG habitat trading rules, loss of this habitat type will need to be addressed by the provision of a minimum of 0.02 units of the same distinctiveness or better habitat required.

4.2 Further Considerations

MHCLG has a requirement to deliver a mandatory 10% increase in biodiversity value relative to the pre-development (baseline) biodiversity value of a development site.

Based on the baseline and retention of area habitats as detailed within this report, the Proposed Scheme has a baseline of 0.85 area units, with habitat retention of 0.73 units. This results in a loss of -0.12 area habitat units, which is a -13.90% net change.

In order for MHCLG to achieve a 10% net gain, an additional 0.20 units need to be provided to increase the total area habitat units to 0.93.

Opportunities for on-site habitat creation and/or enhancement are uncertain because future proposals for the Site are not yet available. Therefore, to address the 10% net gain, MHCLG will need to either:

- Provide 0.20 area habitat units through registered off-site biodiversity gains; or
- Purchase statutory biodiversity credits. For statutory credits, a 'spatial risk multiplier' (SRM) will apply. This means that a credit is worth 0.5 biodiversity units, so two statutory credits must be bought for every one biodiversity unit[18]. Therefore, as 0.20 units are needed to address the deficit for the Proposed Scheme, should statutory credits be purchased, a total of 0.40 area credits would be required.

For both these options, habitat trading rules will need to be complied with. To achieve the 10% net gain, MHCLG will need to rely on registered off-site biodiversity units secured by tree planting, or a habitat of higher distinctiveness.

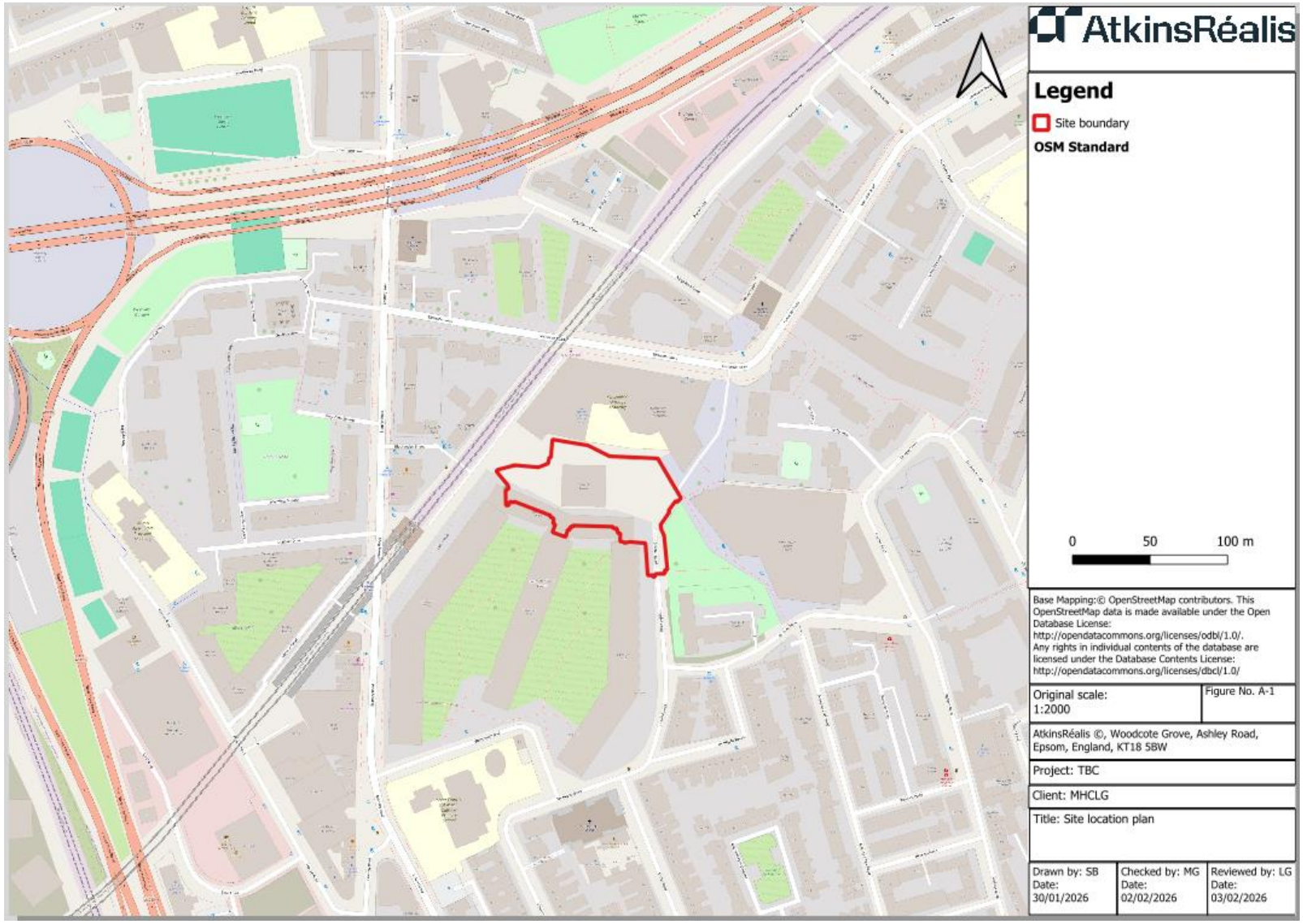
In addition to this, MHCLG is in discussions with schools local to the Site to explore opportunities for tree planting as a bonus scheme outside of the mandatory 10% BNG scope, to ensure local communities benefit. The management of these additional trees would be secured through an agreement between MHCLG and the relevant schools.

[18] Statutory biodiversity credits. https://www.gov.uk/guidance/statutory-biodiversity-credits

APPENDICES

Appendix A. Site Location Plan

Figure A-1 - Site location plan



Appendix B. Summary of Relevant BNG Legislation

The relevant primary legislation for the statutory framework for BNG is principally set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990[19], which was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021[20]. The biodiversity gain objective (the 'biodiversity gain condition') under the statutory framework for BNG is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of a development site. The increase in biodiversity value can be achieved through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits.

The Levelling-up and Regeneration Act 2023[21] has amended Schedule 7A of the Town and Country Planning Act 1990:

- Section 135 Biodiversity net gain: pre-development biodiversity value and habitat enhancement.
  - This provides a clause to ensure that habitats assessed for BNG during pre-development calculations are taken at their highest value on site prior to any proposed clearance that could have been undertaken during a previous activity (e.g., a previous planning application). This is to reduce incentives to clear habitats on potential BNG sites or off-site contributions to BNG.

The relevant secondary legislation (BNG regulations) to support the delivery of the statutory framework for BNG is summarised in **Table B-1**.

Table B-1 – Summary of BNG Regulations

Regulation	Summary
The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024[22]	These regulations make further consequential amendments to existing primary legislation on planning, to integrate the BNG framework. These amendments include the definition of a planning authority under Schedule 7A which sets out the BNG framework.
The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024[23]	These regulations commence BNG for most types of new planning applications and provides transitional arrangements for section 73 permissions. This includes: ▪ Provision for biodiversity gain as condition of planning permission. ▪ Provision for a register of biodiversity gain sites (the 'biodiversity gain site register'). ▪ Arrangement for the purchase of statutory credits.
The Biodiversity Gain Requirements (Exemptions) Regulations 2024[24]	These regulations prescribe exemptions for categories of development to which BNG does not apply. This includes the following: ▪ Householder development. Development which is subject of a householder application as defined within Article 2(1) of the Town and

[19] https://www.legislation.gov.uk/ukpga/1990/8/contents

[20] https://www.legislation.gov.uk/ukpga/2021/30/schedule/14/enacted

[21] https://www.legislation.gov.uk/ukpga/2023/55/contents

[22] https://www.legislation.gov.uk/ukdsi/2024/9780348254419

[23] https://www.legislation.gov.uk/uksi/2024/44/made

[24] https://www.legislation.gov.uk/uksi/2024/47/contents/made

Regulation	Summary
	Country Planning (Development Management Procedure) (England) Order 2015. ▪ Development granted planning permission by a development order under section 59. This includes permitted development rights. ▪ Development subject to the de minimis exemption. Development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5 m by 5 m) of habitat, or 5 metres of linear habitats such as hedgerows. ▪ Self-build and custom build development. Development which: ▫ consists of no more than 9 dwellings, and ▫ is carried out on a site which has an area no larger than 0.5 hectares, and ▫ consists exclusively of dwellings which are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015. ▪ Urgent Crown development granted permission under section 293A Town and Country Planning Act 1990. ▪ Development of a biodiversity gain site. Development which is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the biodiversity gain condition which applies in relation to another development. ▪ Development related to the high speed railway transport network. Development forming part of, or ancillary to, the high speed railway transport network comprising connections between all or any of the places or parts of the transport network specified in section 1(2) of the High Speed Rail (Preparation) Act 2013.
The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024[25]	These regulations amend the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013 to include provisions in respect of applications for planning permission and the submission and determination of Biodiversity Gain Plans, as well as modifications of Schedule 7A of the Town and Country Planning Act 1990 for phased development.
The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024[26]	These regulations set out the modifications for irreplaceable habitat. The following habitats are considered to be irreplaceable for BNG metric calculation purposes: ▪ Blanket bog ▪ Lowland fens ▪ Limestone pavements ▪ Coastal sand dunes ▪ Ancient woodland ▪ Ancient trees and veteran trees ▪ *Spartina* saltmarsh swards

[25] https://www.legislation.gov.uk/uksi/2024/50/contents/made

[26] https://www.legislation.gov.uk/uksi/2024/48/contents/made

Regulation	Summary
	▪ Mediterranean saltmarsh scrub
The Biodiversity Gain Site Register Regulations 2024[27]	These regulations allow for fees to be charged for applications to register land in the biodiversity gain site register and allows the register operator (Natural England) to issue financial penalties where false or misleading information is provided.

B.1 Local Biodiversity Policy

RBKC Green Plan[5]: Protecting and Enhancing Biodiversity

Aims:

- *Creating a better, more joined up green space network*
- *Protecting and improving important local habitat sites*
- *Improve the understanding, enjoyment of nature, and making it accessible to all*

Targets:

- *Ensure that all new development in the Borough provides at least a 10 per cent net gain in Biodiversity from 2022 onwards.*
- *Publish a 5-year plan for the protection and enhancement of the Borough's biodiversity by 2021.*
- *Increase the number of designated Local Sites that are in positive conservation management from 66 per cent to 80 per cent by 2026.*
- *Implement a full review of the Borough's designated Local Sites and habitats by 2022.*
- *Develop a spatial plan for biodiversity through a nature recovery strategy by 2023.*
- *Deliver a Bee Super Highway including 15 new pollinator friendly schemes during 2021.*

RBKC New Local Plan, July 2024[6]

Policy GB14: Green and Blue Infrastructure

GB14: Green and Blue Infrastructure

A. Development will be required to contribute to the greening of the borough, enhance habitat to increase biodiversity, and protect/enhance any nearby waterways.

Green Infrastructure

B. Development proposals are required to maximise opportunities to incorporate green infrastructure with arrangements in place for its long-term maintenance.

C. Major residential development is required to achieve an Urban Greening Factor score of 0.4.

D. Major non-residential development is required to achieve an Urban Greening Factor score of 0.3.

[27] https://www.legislation.gov.uk/uksi/2024/45/contents/made

E. Green infrastructure and landscaping must be designed to:

1. *Be fit for purpose and function.*
2. *Be of a high quality and compatible with the surrounding landscape, and townscape character.*
3. *Integrate with the drainage network to mitigate the effects of climate change and significant rainfall events.*
4. *Be clearly defined as public or private space.*
5. *Optimise the benefit to wildlife habitat including biodiversity net gain.*
6. *Prioritise tree planting.*

Biodiversity

F. Development proposals must protect the biodiversity in, and adjacent to, the borough's Sites of Importance for Nature Conservation (SINCs).

G. Development proposals will be required to create opportunities to extend or link Green Corridors and the Blue-Ribbon Network.

H. A site-specific Ecological Impact Assessment is required to be undertaken and submitted for all major development.

I. Relevant development, including major development, must achieve a minimum on-site biodiversity net-gain of 10 per cent.

J. Where it has been robustly demonstrated that a minimum of 10 percent biodiversity is not achievable on a site, adequate mitigation should be provided on an alternative site or as a last resort compensate using the biodiversity credit system.

K. A Biodiversity Net Gain Strategy is required for development adjacent to the River Thames.

Policy GB15: Parks, Gardens and Open Spaces

GB15: Parks, Gardens and Open Spaces

A. The Council will protect, enhance and make the most of existing parks, gardens and open spaces, and require new high quality outdoor spaces to be provided.

Existing parks, gardens and open spaces

B. The following open spaces are protected, and any loss will be resisted:

1. *Metropolitan Open Land;*
2. *Public open space;*
3. *Registered Historic Parks and Gardens of Special Historic Interest;*
4. *Private communal open space;*
5. *Local Green Spaces where these are designated in a neighbourhood plan or other development plan document.*

C. Development must not have an adverse effect on the environmental and open character, appearance and function of protected open spaces listed under criterion B, garden squares and communal gardens.

Provision of new parks, gardens and open spaces

D. Major development proposals will be required to provide new public open space on-site. Where it can be robustly demonstrated that on-site provision is not feasible or appropriate, a financial contribution will be required to enhance existing public open space or provision of new public open space.

E. Proposals for new public open space will need to be designed in line with the requirements of Policy GB14 and provide a range of outdoor activities for users of all ages.

F. Development in Opportunity Areas will be required to provide on-site public open space in line with Policies SA1 and SA2.

G. Major developments that include residential floorspace will be required to provide on-site external play space in accordance with London Plan Policy S4, including for under-fives.

H. The provision of new public open space is supported, in particular:

1. *A new open space at Chelsea Embankment as part of the Thames Tideway Tunnel project.*
2. *A meanwhile open space at Cremorne Wharf until such a time as it is brought back into wharf use for waste management or waterborne freight handling purposes.*

Policy GB16: Trees

GB16: Trees

Protection of Trees

A. The Council will resist the loss of trees of value, based on amenity, historic or ecological value.

B. Exception to criterion A above will be where:

1. *The tree is dead, dying or dangerous.*
2. *The tree is demonstrated as causing significant damage to adjacent structures.*
3. *Felling is for reasons of good arboricultural practice.*

C. Resist development which results in the damage or loss of trees of townscape or amenity value, or gives rise to the threat, immediate or long term, which affects the continued well-being of such trees.

D. Trees must be adequately protected throughout the course of development, including identified Root Protection Areas.

E. The Council will serve Tree Preservation Orders or attach planning conditions to protect trees of townscape or amenity value that are under threat from development, inappropriate pruning works or removal.

Loss of Trees

F. Require where practicable an appropriate replacement of a suitable size for any tree that is felled and that safeguarding measures are implemented to ensure that the tree has the best possible opportunity of reaching maturity.

G. Where the loss of a tree is unavoidable the Council will require that any new tree compliments existing trees and assists in creating new, high quality green areas which deliver amenity and biodiversity benefits.

H. New trees must be of a suitable species for the location and be compatible with the surrounding landscape and townscape, mitigate the effects of climate change and significant rainfall events.

Appendix C. BNG Principles, Mitigation Hierarchy and Biodiversity Gain Hierarchy

C.1 BNG Good Practice Principles

Table C-1 - BNG good practice principles

Principle	In practice
1. Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
2. Avoid losing biodiversity that cannot be offset by gains elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.
3. Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible, and share the benefits fairly among stakeholders.
4. Address risks	Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between losses occurring and the gains being fully realised.
5. 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.
6. Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust, 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
7. Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).
8. Create a net gain legacy	Ensure net gain generates long-term benefits by:

Principle	In practice
	▪ Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity[28] ▪ Planning for adaptive management and securing dedicating 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
9. Optimise sustainability	Prioritise BNG and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

C.2 Mitigation Hierarchy

Expanding on Principle 1 of the good practice principles for achieving BNG, the mitigation hierarchy and the avoidance of impacts to irreplaceable habitats must be applied when committing to achieving BNG. This is reinforced through the publication of the British Standard BS 8683:2021[2].

The sequential approach to applying the mitigation hierarchy is to:

- Avoid – Where possible habitat damage should be avoided.
- Minimise – Where possible habitat damage and loss should be minimised.
- Remediate – Where possible any damaged or lost habitat should be restored.
- Compensate – As a last resort, damaged or lost habitat should be compensated for[29].

Application of the mitigation hierarchy is encouraged by the Metric because BNG can be more easily achieved by avoiding the loss of habitat through either retention or enhancement. Principle 2 of the Metric adds "*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.*"

C.3 Biodiversity Gain Hierarchy

The Biodiversity Gain Hierarchy and its effect for the purpose of the statutory framework for BNG is set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This hierarchy (which does not apply to irreplaceable habitats) sets out a list of priority actions:

- First, in relation to on-site habitats which have a medium, high and very high distinctiveness, the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects.

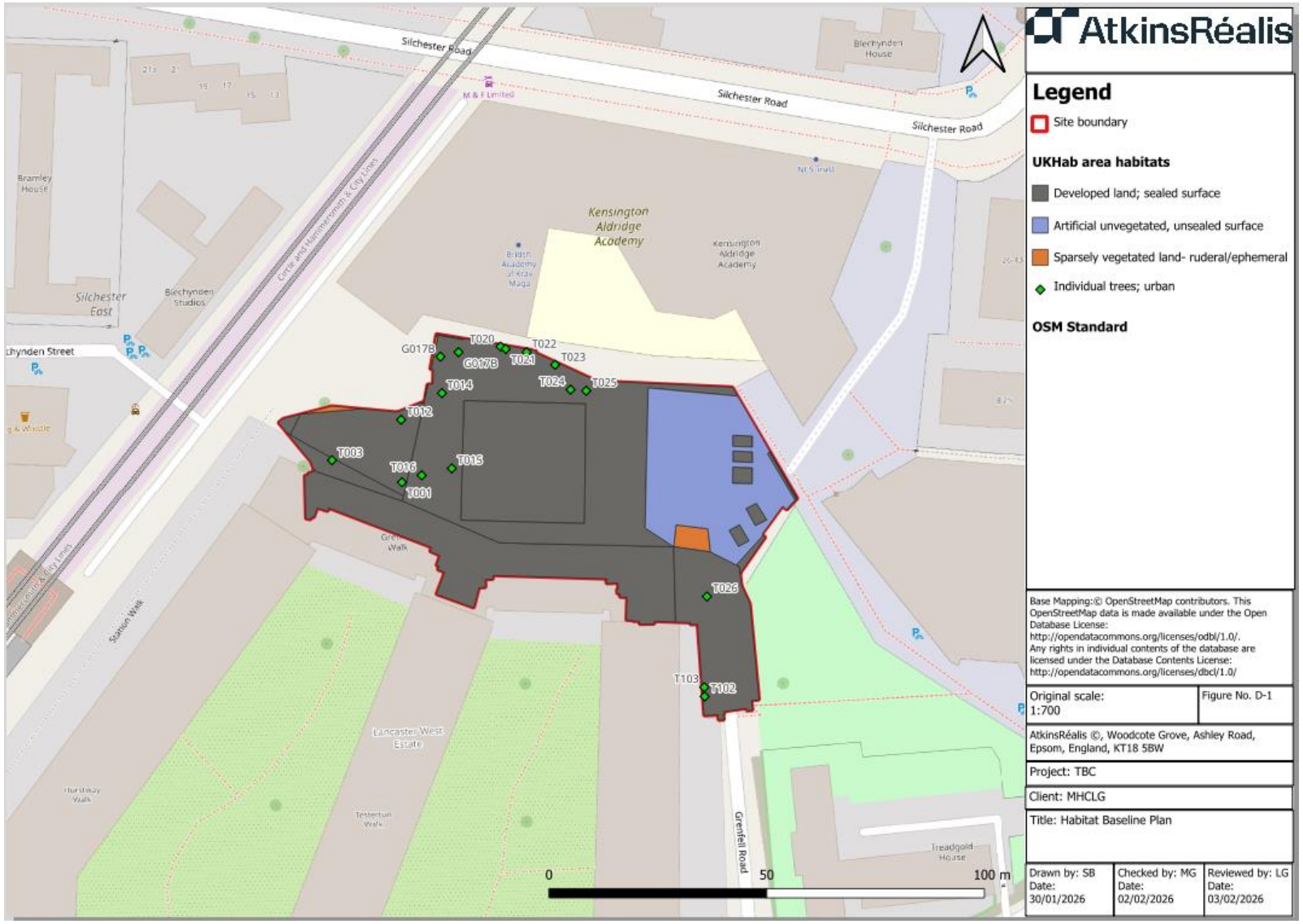
[28] For projects being consented through the Town and Country Planning Act 1990, the Environment Act 2021 now makes provision for habitat enhancements undertaken to deliver biodiversity gain to be maintained for a period of at least 30 years after the development is completed.

[29] Compensation should be undertaken on-site. If this is not possible then off-site habitat compensation may be an option; however, this should be undertaken as close to the on-site area as possible.

- Then, in relation to all on-site habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits.

Appendix D. Habitat Baseline Plan

Figure D-1 - Habitat baseline plan



Appendix E. Condition Assessment Sheets

Table E-1 - Condition assessment sheet - Sparsely vegetated land; ruderal/ephemeral

Condition Sheet: URBAN Habitat Type			
Habitat Types			
Sparsely vegetated land - Ruderal/Ephemeral			
Habitat Description			
Areas of bare ground colonised by ruderal species.			
See the Statutory Biodiversity Metric User Guide for green roofs and UK Habitat Classification (UKHab) for other habitats:			UKHab – UK Habitat Classification
On-site or off-site, site name and location	On-site	**Survey date and Surveyor name**	24/03/2021
Limitations (if applicable)	None	**Survey reference (if relating to a wider survey)**	N/A
Grid reference	TQ 23950 80955	**Habitat parcel reference**	P1 & P2
Condition Assessment Criteria		**Criterion passed (Yes or No)**	**Notes (such as justification)**
Core Criteria - must be assessed for **all urban habitat types**:			
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	No	Limited vegetation structure.
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	No	Limited diversity and very few flowering species present.

C	Invasive non-native plant species (listed on Schedule 9 of WCA[1]) and others which are to the detriment of native wildlife (using professional judgement)[2] cover less than 5% of the total vegetated area[3]. **Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).**	Yes	None present
		Essential criteria relevant for habitat type achieved (Yes or No)	N/A
		Number of criteria passed	1
Condition Assessment Result		**Condition Assessment Score**	**Score Achieved ×/✓**
Results for habitats requiring assessment of **3 core criteria** only:			
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C.		Good (3)	×
• Passes 2 of 3 core criteria; OR • Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)	×
• Passes 0 or 1 of 3 core criteria.		Poor (1)	✓
Suggested enhancement interventions to improve condition score			
N/A			
Footnotes			
Footnote 1 – Wildlife and Countryside Act 1981 (as amended). **Footnote 2** – Sources of information about detrimental non-native species can be found on the GB Non-native Species Secretariat (GBNNSS) website: Home » NNSS (nonnativespecies.org) and Natural England Access to Evidence page should also be checked for up-to-date information: Horizon-scanning for invasive non-native plants in Great Britain - NECR053 (naturalengland.org.uk) For criterion C – For green roof habitat types only – buddleia *Buddleja davidii* should be assessed alongside Schedule 9 species. This species impairs the health of the local ecosystem and reduces the biodiversity potential of the roof. It is also a sign that a roof has not been planted and seeded correctly in subsequent years. **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** – Use professional judgement. Sources of information about non-native species that are not detrimental to native wildlife can be found on the GBNNSS website: Alternative plants » NNSS (nonnativespecies.org)			

Table E-2 - Condition assessment sheet - Individual trees – Urban two

Condition Sheet: INDIVIDUAL TREES Habitat Type																	
Habitat Types																	
Individual trees – Urban trees																	
Habitat Description																	
Individual planted urban trees. Tree T015, T016, T020 and T021 were recorded as felled in the 2026 survey. As such, the condition assessment is based on information obtained in March 2021.																	
Limitations																	
T014 - assessed from a 1m distance behind Herras fencing. T024 behind mesh, only visible from approx. 2 m away through mesh.																	
On-site or off-site, site name and location	On-site	**Survey date**	08/01/2026 (24/03/2021 for T0015, T0016, T020 and T021), 30/01/2026 for T026.														
		Survey reference	N/A														
		Tree reference															
		T001	T003	T012	T014	T015	T016	G017A	G017B	T020	T021	T022	T023	T024	T025	T026	T102	T103
		DBH (cm)															
		2x stem: 40 / 60 cm	2x stem: 45 / 50 cm	15 cm	14 cm	17 cm	9 cm	15 cm	13 cm	10 cm	10 cm	10 cm	12 cm	15 - 20 cm	16 cm	100 cm	12 cm	12 cm
		Notes															
Tree size **S = small, M = medium, VL = very large**		M	M	S	S	S	S	S	S	S	S	S	S	S	S	VL	S	S
Tree species		London plane	London plane	Fastigiate oak	Turkish hazel	Common alder	Field maple	Ornamental pear	Ornamental pear	Cockspur thorn	Cockspur thorn	Cockspur thorn	Cockspur thorn	Turkish hazel	Turkish hazel	London plane	Black locust	Black locust
Condition Assessment Criteria		**Criterion passed (Yes or No)**															
A	The tree is a native species (or at least 70% within the block are native species).	No	No	No	No	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
C	The tree is mature (or more than 50% within the block are mature)[1].	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	No	Yes	No	No
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No	No	No	No

	trees retain >75% of expected canopy for their age range and height.																	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	No	No	No	Yes	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No
Number of criteria passed		3	3	1	2	4	4	2	2	2	2	1	1	2	1	2	1	1

Condition Assessment Result	**Condition Assessment Score**	**Score Achieved ×/✓**																
Passes 5 or 6 criteria	Good (3)																	
Passes 3 or 4 criteria	Moderate (2)	✓	✓			✓	✓											
Passes 2 or fewer criteria	Poor (1)			✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Suggested enhancement interventions to improve condition score[2]

N/A

Footnotes

Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from:
Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk)
and:
Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)
Footnote 2 - Enhancement of this habitat type is only possible by improving the habitat so that it meets all Criteria B, D and F. It is not possible or appropriate to enhance individual tree/s through meeting just one or two of those Criteria, nor by meeting Criteria A, C or E.

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