The Phoenix Academy Masterplan

Biodiversity Net Gain Assessment

552964dpSep25FV03_BNGA

September 2025

Client: London Square

Project: Phoenix Academy and The Curve

Report: Biodiversity Net Gain Assessment

QUALITY ASSURANCE

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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd (Greengage) was commissioned by London Square to undertake a Biodiversity Net Gain Assessment (BNGA), using the Statutory Biodiversity Metric (SBM), for an area of land known as Phoenix Academy and The Curve, hereafter referred to as 'the site'.

The BNGA aims to quantify the predicted change in biodiversity value of the site in light of the proposed development to assess compliance against national and local planning policy and against the BNG mandate set out in the Environment Act 2021, which states that all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% biodiversity net gain.

The site extends to 2.90 hectares (ha) and comprised 0.7033 hectare (ha) of modified grassland, 0.0140 ha of bramble scrub, 0.7546 ha of buildings, 0.0933 ha of artificial unvegetated, unsealed surface, 1.2937 ha of developed land; sealed surface, 0.0199 ha of introduced shrub, 0.0251 ha of vegetated garden and 0.9111 ha of individual trees (which equates to 53 small, 20 medium, 8 large and 1 very large trees) as identified from a site walkover undertaken on 22nd November 2024, alongside data received from a desk study.

Proposed habitat creation includes 0.0769 ha of modified grassland, 0.0977 ha of introduced shrub, 0.2153 ha of biodiverse green roof, 0.2023 ha of buildings, 0.4075 ha of developed land; sealed surface, 0.0384 ha of rain gardens and 0.8153 ha of individual trees (which equates to 200 small trees). The development seeks to retain 0.6628 ha of individual trees (which equates to 18 small, 18 medium, 2 large and 1 very large trees), 0.1602 ha of modified grassland, 0.0677 ha of buildings and 0.1843 ha of developed land; sealed surface.

The locations, extents, conditions and habitat parcel reference numbers of the pre-development (baseline) and post development habitats are mapped in Figure A.1 and Figure B.1. The habitat values are split into three categories: area-based 'Habitat Units' (HU), linear-based 'Hedgerow Units' (HeU) and aquatic linear-based 'Watercourse Units' (WU) respectively, where applicable to the site.

The pre-development baseline values are 8.87 HU.

The 10% BNG targets are therefore 9.76 for HU.

The post-development design proposals are predicted to deliver 10.57 HU. This is a net gain of 1.70 HU (equivalent to +19.10 % for HU).

The design proposals do not meet the BNG Trading Rules due to the net loss of 0.06 HU derived from heathland and shrub habitats.

The proposed development will include areas that will significantly contribute to the biodiversity value of the site. Therefore, a Habitat Management and Monitoring Plan (HMMP) for the habitat retention/enhancement, creation and long term management over 30 years (minimum) will be required for submission to the Local Planning Authority (LPA). This should be secured through planning condition. When these recommendations are adhered to, the proposals stand to be compliant with legislation and current planning policy.

Providing these recommendations are adhered to, the proposals stand to be compliant with legislation and current planning policy.

Upon receiving planning permission, the submission of a Biodiversity Gain Plan (BGP) to the LPA will be required.

Alongside the BNGA, qualitative ecological enhancement recommendations have also been provided which contribute to further increasing the ecological value of the scheme. Refer to the Preliminary Ecological Appraisal (report ref: 552964bnSep25FV02_PEA) for more detail.

2.0 INTRODUCTION

Greengage Environmental Limited (Greengage) was commissioned by London Square to undertake a Biodiversity Net Gain Assessment (BNGA), using the Statutory Biodiversity Metric (SBM), for an area of land known as the Phoenix Academy and The Curve, hereafter referred to as 'the site'.

Under the Environment Act 2021, developments are mandated to achieve a 10% biodiversity net gain (BNG), and they may also be required to under local policy. Most Local Planning Authorities (LPA) require a 10% net gain delivered against a site's pre-development (baseline) value. This is determined through assessing the condition of pre-development habitats on the site i.e. calculating the baseline at the BNGA Baseline stage, followed by comparison against the anticipated changes in biodiversity value based on the development proposals.

This BNGA has been undertaken in September 2025. Any further changes to the design will impact upon the BNG score and the SBM calculations will need to be updated to reflect such changes. This also carries forward throughout the entire lifetime of the project, including after planning permission has been granted, in and throughout the construction phase. BNG aims to give an accurate reflection of the changes happening on site.

2.1 SITE DESCRIPTION

The survey area extends to approximately 2.96 hectares (ha) and is centred on National Grid Reference TQ 22415 80797, Ordinance Survey (OS) co-ordinates 522415, 180797.

The site comprises a complex of educational buildings (designated as B1-B7). The site also includes a series of hardstanding roads, car parking areas, children's playgrounds and sports courts, alongside areas of modified grassland, raised beds with ornamental shrubbery, and scattered trees.

The site is located within the London Borough of Hammersmith and Fulham, approximately 1.5 kilometres (km) northwest of the Sheperd's Bush Underground Station. The surrounding landscape is urban in character, with the area immediately surrounding the site comprising mainly of residential dwellings, amenity gardens and urban infrastructure (e.g. paved roads). Private and communal gardens provide semi-natural space in the vicinity of the site alongside public parks, the closest of which is Wormholt Park (0.05km south of the site). The A40 (Westway) is a dual carriageway 0.05km north, which runs east - west, and likely presents a barrier to the dispersal of terrestrial species and bats.

Beyond the immediate surroundings, urban land use continues including areas for commercial activities (e.g. Westfield, White City - 1.50km southeast), a tree-lined railway (0.20km north), larger areas of open space (e.g. Wormwood Scrubs - 0.49km north) and extensive residential developments. Notable habitats nearby include traditional orchard (0.31km south), lowland mixed deciduous woodland (0.41km northwest), woodpasture and parkland (0.50km north) and open mosaic habitat (0.92km west).

2.2 PROPOSED DEVELOPMENT

Proposals seek:

"*Demolition of existing buildings and structures, and comprehensive phased redevelopment of existing school site comprising new buildings, containing residential units (Use Class C3) and*

replacement school facilities (Use Class F1), together with private and communal amenity space, landscaping, car parking, cycle parking and other associated works."

The collection of drawings listed below, produced by Exterior Architecture, dated 10/07/2025, have been used as the basis for information regarding the proposed post-development habitats and has been used to inform the comparison against the baseline values. They are herein referred to collectively as 'the proposed development':

- Combined Masterplan_UGF Calculation;
- 2435-EXA-ZZ-00-DR-L-LANDSCAPE GENERAL ARRANGMENT PLAN; and
- DAS_DRAFT_250820.

Furthermore, the Tree Protection Plan and Arboricultural Tables provided by Keen Consultants was used to inform baseline tree size and tree retention/loss.

3.0 METHODOLOGY

3.1 PRE-DEVELOPMENT (BASELINE)

Habitat Data

A Preliminary Ecological Appraisal (PEA) [Report Ref: 552964bnSep25FV02_PEA] has been undertaken by Greengage in accordance with guidance in the UK Habitat Classification System (UKHab)[1] and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal[2], in accordance with British Standard (BS) 42020: 2013: Biodiversity[3]. The PEA included a site walkover which identified and mapped the extent and distribution of different habitat types on site according to the standard UKHab classification methodology, i.e. using Primary Codes, and supplemented with Secondary Codes. Habitats have been split into ' habitat parcels' within the report, for the purposes of denoting differentiations in characteristics/composition within habitat types, where applicable. A habitat map was produced to illustrate the results, which is provided as Appendix A.

During the PEA, the habitats were also subject to Condition Assessments, where relevant, in accordance with the SBM Condition Assessments. (See 'Habitat Condition' below).

Statutory Biodiversity Metric Calculation Tool

This BNGA uses the government mandated methodology within the ‘Statutory Biodiversity Metric User Guide’ (SBM User Guide), distributed by Department for Food Environment and Rural Affairs (Defra), February 2024[4].

BNG uses habitat type and condition as a proxy for overall biodiversity value, measured in Biodiversity Units (BU) which are calculated using the SBM. The BU are separated into area-based Habitat Units (HU), linear-based Hedgerow Units (HeU) and aquatic linear-based Watercourse Units (WU), as applicable to a site, respectively. For this site, HU only are applicable. No hedgerows or watercourses are present within the site or likely zone of influence.

The following information on each habitat type are the required SBM inputs:

- Type;
- Area/length;
- Condition; and
- Strategic significance.

The areas of each habitat parcel are measured, with each habitat parcel assigned a ‘Distinctiveness’, ‘Condition’ and 'Strategic Significance' score. Distinctiveness is a default score for the habitat classification, representing its inherent biodiversity value, whereas condition refers to the state each habitat parcel is in relative to a predetermined set of criteria outlined in the SBM User Guide.

Strategic significance draws upon priorities and objectives within local plans and strategies, and is measured by providing habitats with a score from low to high as follows:

- Low - "area / compensation not in local strategy";
- Medium - "location ecologically desirable but not in local strategy"; and

- High - "formally identified in local strategy".

To calculate the pre-development (baseline) BU value, habitat data collected during the PEA has been used. A PEA UKHab map has been created based on the data collected in the field using Coreo[5] software. The area extents for each habitat type shown in the UKHab map were then measured using Quantum Geographical Information System (QGIS) software. See Appendix A.

To calculate the HU associated with trees on site, stem diameters of each tree were used to assign each tree a rating of 'small', 'medium', 'large' or 'extra large', in line with the User Guide. The rating corresponds to an area value to be used.

Distinctiveness values were automatically calculated for the site and habitat conditions were assessed both in the field, and retrospectively using site photos.

Type and Area/Length

Habitat types documented in the PEA use UKHab classifications and primary codes supplemented by secondary codes, where applicable. The SBM uses a classification system based mainly on the UKHab Classification System[1] but with input also from other systems including the Water Framework Directive (WFD) Lakes Typology[6], the European Nature Information System (EUNIS) habitat definitions[7], Habitats Directive Annex 1 definitions[8].

As such, UKHab classifications used in the PEA do not always translate directly into the SBM habitat types that are available for selection within the pre-set drop-down menus. Occasionally UK Hab secondary codes provide the key information to be able to allocate the SBM 'best fit' selection for the UKHab habitat type. Habitat conversions that are applicable to the site are listed in Table 3.1 below. The SBM classifications are hereafter used throughout the report.

Table 3.1 UKHab to SBM habitat conversions

UKHab Habitat Type	SBM Habitat Type	Reasoning
Buildings	Developed land; sealed surface	Buildings are a habitat within Developed land; sealed surface within UKHab
Other developed land - Biodiverse green roof	Biodiverse green roof	Biodiverse green roof is a secondary code within UKHab
Other developed land - Rain garden	Rain garden	Rain garden is a secondary code within UKHab

For individual trees present on the site, the area extent attributed to individual trees has been calculated using the 'Tree helper' within the SBM calculation tool. This is based upon using Diameter at Breast Height (DBM) in centimetres (cm). The DBH measurements for individual trees within the site have been taken from tree tables produced by Tyler Grange. In accordance with the SBM User Guide, based on 'Diameter at breast height (centimetres (cm)), tree sizes have been recorded as follows;

- Small is less than 30 cm diameter,
- Medium is greater than 30 cm, to less than or equal to, 60 cm;
- Large is greater than 60 cm, to less than or equal to 90 cm; and,
- Extra large is greater than 90 cm.

Habitat Condition

Where applicable, habitats were subject to a condition assessment in accordance with the SBM Condition Assessments. Formalised copies of the Condition Assessments for the Baseline habitats are provided as Appendix A.

Habitat condition must be quantified using criteria set out by the SBM Condition Assessments to determine their relative condition.

The condition of a habitat is a measure of the biological 'working-order' of a habitat type judged against the perceived ecological optimum state for that particular habitat.

The condition of each habitat type was assessed against pre-set criteria and categorised as either 'Good', 'Fairly Good', 'Moderate', 'Fairly Poor' or 'Poor'. Where a habitat type varies in condition within the site this was recorded and mapped.

Strategic Significance

The SBM calculation tool accounts for whether the habitat is situated in an area locally identified as significant for nature.

Data on areas and habitats locally identified as significant for nature were obtained from the following:

- Multi-Agency Geographical Information for the Countryside (MAGIC) website for mapped statutory designated sites;
- Greenspace Information for Greater London (GiGL) was consulted in November 2024 during the PEA for records of statutory and non-statutory designated sites for nature conservation within and adjacent to the site;
- Habitats listed within the Local Biodiversity Action Plan (LBAP);
- Local Plans;
- Local Nature Recovery Strategies;
- River Basin Management Plans;
- Catchment Plans;
- National Character Area profiles; and
- Priority Habitats for Restoration.

Using the SBM calculation tool, habitat values have been calculated based on whether they occur commonly or whether they are rare, their area (ha) (or length (km) for linear features such as hedgerows), condition and importance within the local area, usually identified from local relevant planning policies or documents.

3.2 POST- DEVELOPMENT (PROPOSED)

To calculate the post-development BU value, the area extents for each habitat type were measured based on the proposed development, using Quantum Geographical Information System (QGIS) software. See Appendix B.

Targeted condition scores were assigned by Greengage, using the SBM habitat condition criteria, whilst considering the likely future use of each area on the proposed development and what was considered feasible to reach.

In accordance with the BNG Trading Rules, changes in broader habitat types (for example, 'Urban', 'Woodland' and 'Grassland' habitats) are also tracked, and trading habitats is discouraged unless specifically targeted within a local strategy. Trading down of habitats is not permitted.

The definition of 'significant enhancements', in accordance with government guidance (www.gov.uk) is 'areas of habitat enhancement which contribute significantly to the proposed development's BNG, relative to the biodiversity value before development'.

Retention of existing habitat does not count as an on-site enhancement.

What counts as a significant enhancement will vary depending on the scale of development and existing habitat, but these would normally be:

- habitats of medium or higher distinctiveness in the biodiversity metric;
- habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development;
- habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development;
- areas of habitat creation or enhancement which are significant in area relative to the size of the development;
- enhancements to habitat condition, for example from poor or moderate to good.

3.3 COMPETENICES

In accordance with 'British Standard: 8683 (BS:8683) Process for designing and implementing biodiversity net gain – Specification', this BNGA and all associated condition assessments have been completed by competent, suitability trained and qualified ecologists.

Daniel Perlaki, Senior Consultant, has an undergraduate degree in Ecology (BSc Hons), a Master's degree in Conservation Science and Policy and is a Graduate member of CIEEM. Dan has over 8 years' experience in ecology survey and consultancy.

Mitch Cooke has a degree in Ecology (Hons), an MSc in Environmental Assessment and Management, and is a Full member of CIEEM with over 35 years' experience in ecological survey and assessment. Mitch has set up and developed ecological and environmental teams for nearly 20 years and has undertaken and managed numerous ecological surveys and assessments.

This report was written by Daniel Perlaki, reviewed by Mitch Cooke and verified by Mitch Cooke who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased, and exaggerated statements.

3.4 ASSUMPTIONS

General

The original PEA site walkover was undertaken outside of the optimal botanical growing season (i.e. outside April to August) and as such, condition of the habitats and species listings could not be accurately obtained as required for habitat classification and condition assessments. However, follow up bat surveys were undertaken between May and August 2025, during which habitats were re-assessed.

Statutory Biodiversity Metric Calculation Tool

Strategic significance for the baseline has been determined to be low ('Area/compensation not in local strategy/no local strategy) for all pre- and post-development habitats following a review of relevant documents.

The condition of the habitats, either for the baseline or that a habitat is considered to be able reach post-development, has been assessed using information within the SBM User Guide and based upon the ecologist's judgement of the habitats/input from the landscape architect.

Note the sum of the values shown in columns within the Biodiversity Units tables may differ from the total units stated. This is due to rounding and is not considered significant. The totals stated reflect those calculated within the SBM calculation tool, based on the SBM User Guide.

4.0 RESULTS

4.1 PRE-DEVELOPMENT (BASELINE)

Desk Study

Statutory Designated Sites

There are two statutory sites of international importance located within 10km. Such sites include Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites, and are internationally recognised as part of a Europe-wide network of protected areas. The closest is >6km south of the site and therefore considered outside the likely zone of influence.

Non-statutory Designated Sites and/or Local Nature Reserves

Records from GiGL identified 34 non-statutory Sites of Importance for Nature Conservation (SINCs) within 2km of the site boundary. SINCs are recognised by LPAs as important wildlife sites. The nearest is 0.49km from the site and also considered outside the likely zone of influence.

Irreplaceable habitats

No irreplaceable habitats were recorded within the site or likely zone of influence.

Statutory Biodiversity Metric Calculation Tool

Using the SBM calculation tool the baseline biodiversity value of the site has been calculated as 8.87 HU.

A breakdown of the baseline calculations for HU is provided in Table 4.1 below:

Table 4.1 Baseline Habitat Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Grassland	Modified grassland	0.7152	Low	Poor	1.43
Heathland and shrub	Bramble scrub	0.0140	Medium	N/A	0.06
Urban	Developed land; sealed surface*	0.7922	Very low	N/A	0.00
Urban	Artificial unvegetated, unsealed surface	0.0933	Very low	N/A	0.00
Urban	Developed land; sealed surface	1.3044	Very low	N/A	0.00
Urban	Introduced shrub	0.0217	Low	N/A	0.04

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Urban	Vegetated garden	0.0271	Low	N/A	0.05
Individual trees**	Urban tree	0.9111	Medium	Moderate	7.29
***Buildings ****Individual trees are not included in the total site area to avoid double counting**				**TOTAL**	**8.97**

The above tables have been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- The pre-development (baseline) habitats did not appear to have been subject to degradation prior to the condition assessment.
- In accordance with the SBM User Guide, 'Developed land; sealed surface', 'Introduced shrub', 'Artificial unvegetated, unsealed surface', 'Bramble scrub' and 'Vegetated Garden' have no condition assessment.
- 'Modified grassland' was considered to be in poor condition. Under the Low distinctiveness grassland condition assessment sheet, this habitat across the site fails criterion A, which requires a species diversity of >6 per m2. This habitat is dominated by perennial ryegrass *Lolium perenne*, with occasional other grasses and herbs.
- 'Urban trees' across the site were considered to be in moderate condition. They were assessed as a single block. Criterion A, requiring 70% of trees to be native was failed, in addition to criteria C and D, requiring 50% of trees to be mature and free from signs of detrimental anthropogenic impacts.

4.2 POST-DEVELOPMENT (PROPOSED)

Using the SBM calculation tool, the proposed development is predicted to deliver 10.57 HU, as shown in Table 4.4.

Based on the proposed site layout drawing, the proposed development is predicted to provide 7.51 HU and 0.10 HeU as shown in Table 4.3 and 4.4.

Table 4.2 Post-Development Habitat Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Retained					
Grassland	Modified grassland	0.1602	Low	Poor	0.32
Individual trees	Urban tree	0.6628	Medium	Moderate	5.30
Created					
Grassland	Modified grassland	0.0121	Low	Moderate	0.04

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Grassland	Modified grassland	0.0769	Low	Poor	0.15
Urban	Developed land; sealed surface*	0.6069	Very low	N/A	0.00
Urban	Developed land; sealed surface	1.2494	Very low	N/A	0.00
Urban	Biodiverse green roof	0.2153	Medium	Good	1.21
Urban	Introduced shrub	0.3023	Low	N/A	0.58
Urban	Rain garden	0.0929	Low	Good	0.47
Individual trees	Urban tree	0.8153	Medium	Moderate	2.49
***Buildings **Urban trees and green walls are not included in the total site area to avoid double counting**				**TOTAL**	**10.57**

Based on the proposed site layout, the proposed development is predicted to provide 0.10 HeU as shown in Table 4.4.

Table 4.3 Post-Development Hedgerow Units

Habitat Type	Length (Km)	Distinctiveness	Condition	Hedgerow Units
Created				
Non-native and ornamental hedgerow	0.102	Very low	Poor	0.10
			TOTAL	**0.10**

The above tables have been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- The metric calculation reflects HU and HeU only as river habitats are not proposed within the post-development design.
- 'Developed land; sealed surface' relates to all areas of hardstanding, building, impermeable surfaces and permeable hard surfaces (including permeable paving) within the proposed development design. The habitat has a pre-set condition within the SBM and does not contribute any biodiversity units to the calculation.
- The majority of the 'modified grassland' habitat proposed within the Phoenix Academy has been assumed to achieve poor condition. These areas are likely to be subject to high levels of recreational use and footfall, and as such will require a low-diversity robust lawn which will not possess 6 species per square metre. However, proposed modified grassland within The

Curve residential development will likely be used less intensively, and will therefore achieve condition criterion A, requiring this species diversity. It will, however, likely be maintained at a uniformly short sward height (fail criterion B) and receive physical damage from footfall (fail criterion D). It is considered likely to have <20% scrub encroachment, as scrub will be managed and removed (pass criterion C), have <10% bare ground (pass criterion E), have <20% bracken *Pteridium aquilinum* cover due to the lack of propagules in the area (pass criterion F) and have no INNS present (pass criterion G). Therefore, this habitat is likely to achieve moderate condition.

- The proposed 'rain gardens' are likely to achieve good condition. They will feature a diverse array of flowering plants to provide year-round nectar sources for invertebrates (pass criterion B), will have areas of bare ground amongst shrub and herbaceous planting (pass criterion A) and have no INNS present (pass criterion C).
- The proposed 'biodiverse green roofs' are predicted to achieve good condition. They will feature a low-nutrient substrate, seeded with an appropriate wildflower/grass/sedge mix for an urban London setting. They will possess varied habitat structure, with areas of bare ground maintained amongst other ecotones (pass criterion A), will provide a nectar resource for invertebrates throughout the year (pass criterion B) and will have no invasive non-native species (INNS) present. Ongoing management will ensure no INNS establish (pass criterion C). Furthermore, an appropriate number of invertebrate habitat features, such as log piles, stone mounds and sandy piles will be incorporated to increase habitat heterogeneity (pass criterion G).
- Proposed 'urban tree' habitat is likely to achieve moderate condition. The area of 0.8153 ha is measured using the tree helper tool and is equivalent to 200 small trees. Whilst the majority of trees (>70%) are unlikely to be of native origin (fail criterion A) or be >50% mature within the time to target condition (fail criterion C), and will not develop natural features to provide ecological niches for invertebrates (fail criterion E), they pass criterion B by default, will be protected from adverse impact from human activities (pass criterion D) and have >20% of their canopy oversailing vegetation (pass criterion F).
- The proposed 'non-native and ornamental hedgerow' which separates the two sites (The Curve and the Phoenix Academy), is predicted to achieve poor condition. It will be maintained at >1.5m height (pass criterion A1), feature a canopy <0.5m from the ground (pass criterion B1), be restocked should any gaps form (pass criterion B2) and be free from INNS (pass criterion D1). However, it will not be maintained at 1.5m width (fail criterion A2) and will not feature >1m of undisturbed semi-natural habitat along its length (fail criterion C1, C2 and D2).
- 'Introduced shrub' will consist of areas of flowering and evergreen amenity shrubs planted at ground floor and at podium level. Introduced shrub is likely to provide a biodiverse rich area for pollinators and other wildlife. In line with the SBM, this habitat has a pre-set condition of 'condition assessment N/A'.

5.0 EVALUATION AND DISCUSSION

Under the development proposals, and in the absence of additional enhancement measures and habitat creation, the development is predicted to deliver 10.57 HU, which is an increase of 1.70 HU. This corresponds to an equivalent 19.10% BNG. Furthermore, the increase of 0.10 HeU above the baseline equates to a net gain for HeU, though a percentage cannot be calculated.

There is a net loss of 0.06 HU associated with heathland and shrub habitats which is not compensated for through provision of higher distinctiveness habitats, or habitats in the same broad habitat classification. As such, habitat trading rules are not met. Despite the net gain of 19.10% for HU, offsite compensation of 0.06 HU will be required. A copy of the SBM calculation tool outputs is provided as Appendix E.

Should these offsite HU be secured, either by the client themselves or purchased through third party providers, proposals stand to comply with relevant legislation (see Appendix F for context).

Table 5.1 below evaluates whether the habitat types that will be present post-development will contribute 'significant enhancements'.

Table 5.1 Significant Enhancements Evaluation

Criteria	Present/Absent	Comments
Habitats of medium or higher distinctiveness in the biodiversity metric (created)	Present	Proposals include the creation of 'Urban trees' and 'Biodiverse green roofs' which are medium distinctiveness habitats.
Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development	Absent	Low distinctiveness habitats contribute a total of 1.24 HU, which is approximately 19% of the overall pre-development score. This is not considered to be a large number.
Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development	Present	The proportion of medium distinctiveness habitats is increased above baseline levels.
Areas of habitat creation or enhancement which are significant in area relative to the size of the development	Absent	Approximately 24% of the site area is to be composed of semi-natural habitats which is likely a decrease against pre-development levels.
Enhancements to habitat condition, for example from poor or moderate to good	Absent	No enhancement of pre-development habitats is proposed.

The habitats that will be present on-site post-development will comprise common habitat types, however in line with the above table, as per the SBM guidance, will constitute significant enhancements. As such, the production of a Habitat Management and Monitoring Plan (HMMP) is

appropriate to set out the actions required to manage and maintain the habitats to maximise their biodiversity value over the long term (30 years minimum).

Further qualitative ecological enhancement should ideally also be targeted on site through the provision of invertebrate habitat features (such as pollinator posts or bee bricks), bird boxes (such as for garden birds) and bat boxes, to help protect nationally and locally important species, including those specified in national, regional and local Biodiversity Action Plans.

6.0 OFF-SITE COMPENSATION

It was identified in Section 4.0 that offsite compensation is required to address habitat trading issues. Despite the net gain of 19.10% and for HU, offsite compensation of 0.06 HU from heathland and shrub habitats respectively will be required.

Off-site compensation options should be investigated following the BNG mitigation hierarchy order i.e. Off-site (within the client's ownership), Off-site (outside of the client's ownership), Local Market Analysis or Purchasing Statutory Credits (as a last resort). In this instance, given the low number of units required, this will be provided through off-site compensation through a third party organisation such as habitat banks.

The purchase of these HU should be secured through a planning condition requiring a Biodiversity Gain Plan (BGP).

7.0 SUMMARY AND CONCLUSIONS

In accordance with the Environment Act 2021, the National Planning Policy Framework (2024), developments (with a few exemptions) have to deliver at least a 10% net gain in biodiversity, which should be evidenced through a complete BNGA using the SBM.

This BNGA has been completed to identify the pre-development (baseline) biodiversity value of the site and compare against the predicted post-development biodiversity value.

The baseline values for the site have been calculated as 8.87 HU.

The 10% BNG targets are therefore 9.76 for HU.

The post-development design proposals are predicted to deliver 10.57 HU. This is a net gain of 1.70 HU (equivalent to +19.10 % for HU).

The post-development design proposals are predicted to deliver 0.10 HeU. This is a net gain of 0.10 HeU.

The design proposals do not meet the BNG Trading Rules due to the net loss of HU associated with heathland and shrub habitats. Minor off-site compensation will be required to meet the trading rules.

Off-site compensation options should be investigated following the BNG mitigation hierarchy order i.e. Off-site (within the client's ownership), Off-site (outside of the client's ownership), Local Market Analysis or Purchasing Statutory Credits (as a last resort).

The proposed development is predicted to deliver a significant BNG due to the creation of medium distinctiveness habitats. Therefore, a Habitat Management and Monitoring Plan (HMMP) for the habitat retention/enhancement, creation and long-term management over 30 years (minimum) will be required for submission to the LPA. This should be secured via condition. When these recommendations are adhered to, the proposals stand to be compliant with legislation and current planning policy.

Upon receiving planning permission, the submission of a Biodiversity Gain Plan (BGP) to the LPA will be required. This BGP must include details of the proposed off-site BNG compensation, including the Biodiversity Gain Site Register Reference.

Qualitative habitat enhancement recommendations have also been given within the PEA to further increase the ecological value of the scheme.

APPENDIX A APPENDIX A PRE-DEVELOPMENT (BASELINE) HABITAT MAP

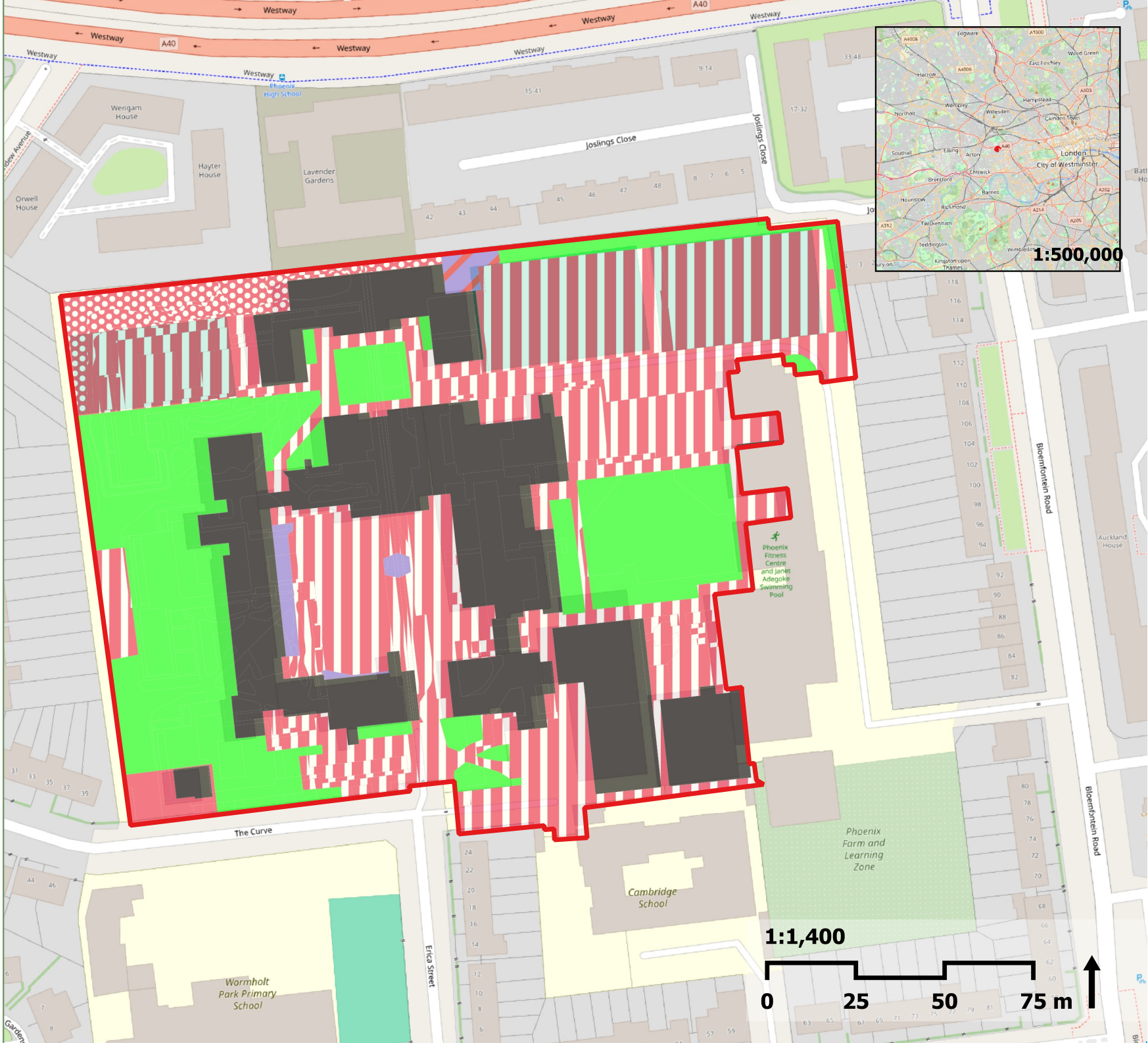
Figure A.1 Pre-development (Baseline) Habitat Map

PHOENIX ACADEMY AND THE CURVE

- Red Line Boundary

Habitats

- Buildings
- Artificial unvegetated unsealed surface
- Bramble scrub
- Developed land; sealed surface
- Introduced shrub
- Modified grassland
- Vegetated garden



Title: Figure A.1 UKHab plan

Drawn by: DP
Date: 09/09/25

Reviewed by: JH
Date: 09/09/25

Project number: 552964
Sources: ESRI World Topo, Greenspace Information for Greater London (GiGL)

Greengage

APPENDIX B APPENDIX B POST-DEVELOPMENT HABITAT MAP

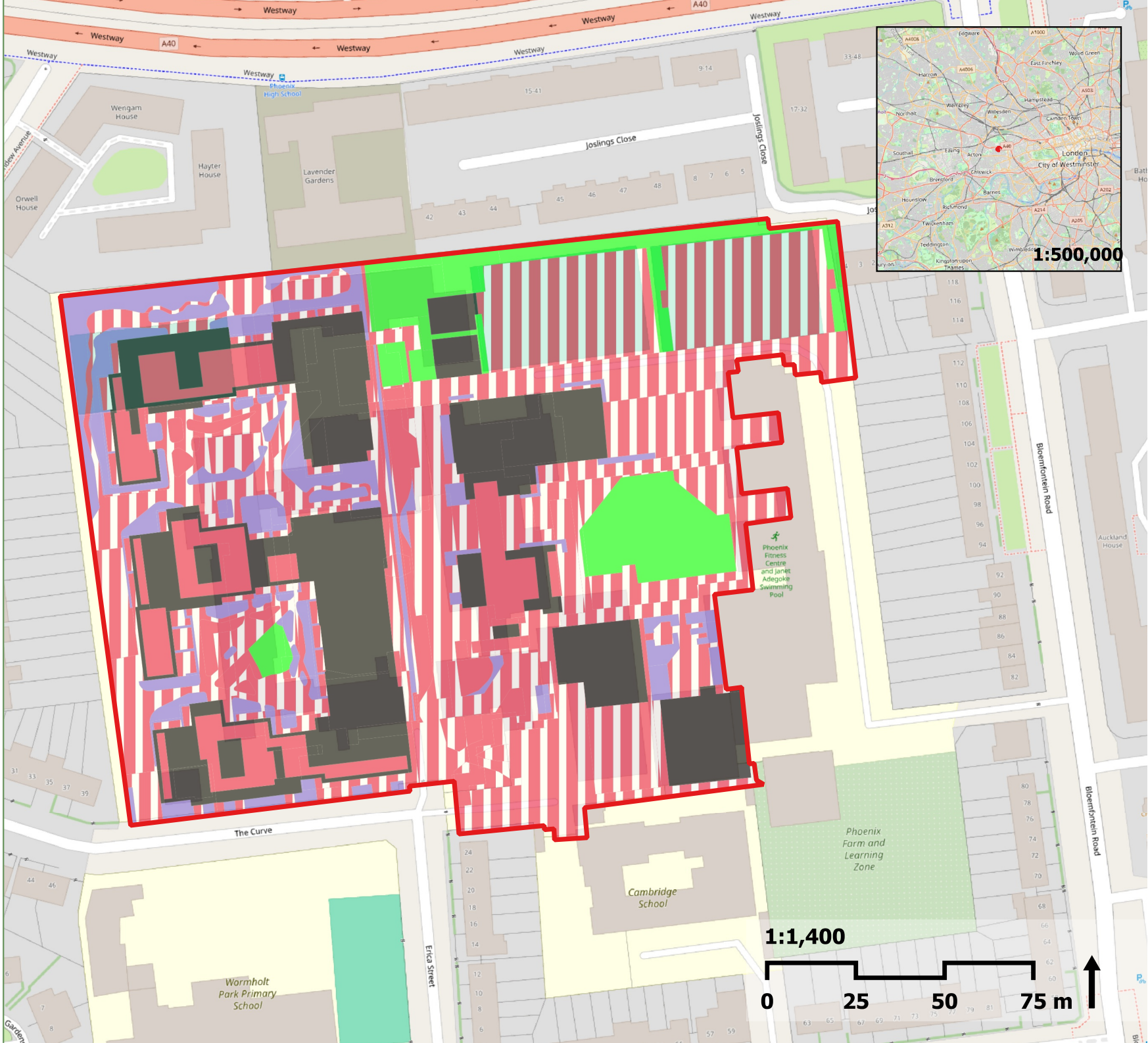
Figure B.1 Post-development Habitat Map

PHOENIX ACADEMY AND THE CURVE

- Red Line Boundary

Habitats

- Buildings
- Biodiverse green roof
- Developed land; sealed surface
- Introduced shrub
- Modified grassland
- Rain garden



Title: Figure B.1 Proposed Development UKHab Plan

Drawn by: DP
Date: 09/09/25

Reviewed by: JH
Date: 09/09/25

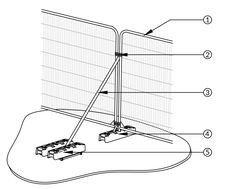
Project number: 552964
Sources: ESRI World Topo, Greenspace Information for Greater London (GiGL)

Greengage

Schedule of trees at Phoenix Academy, The Curve, London W12 0RQ

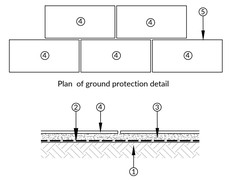
Tree No.	Species	Ht (m)	Branch Spread (m)				Stem diameters (cm)								Height of crown clearance (m)	Height of first branch (m) and direction (N, E, S or W)	Life Stage / Age class	Category grading	Estimated remaining contribution (yrs)	Condition Physiological / Structural	Tree Works to BS3998	Root protection radius (m)	Root protection area sq.m
			N	E	S	W	Single Stem	2-5 stems					More than 5 stems										
								Stem 1	Stem 2	Stem 3	Stem 4	Stem 5	Mean dia	No. stems										
1	Lime	14	3	4	4	4	63								3	3N	E	A2	>40	Growing in pavement adjoining The Curve. Has been crown reduced in the past.		7.56	180
2	Lime	14	5	4	4	4	64								4	4N	E	A2	>40	Growing in pavement adjoining The Curve. Has been crown reduced in the past.		7.68	185
3	Whitebeam	8	3	1	2	2	29								2	2W	Y	C1	>10	Small tree growing close to wall (tag number 0641)	Remove.	3.48	38
4	Norway maple	11	3	2	3	4	30								2	2W	Y	C1	>10	Small tree growing close to wall. Long vertical scar on northern side of stem.	Remove.	3.60	41
5	Hybrid thorn	3	3	3	3	3	28								2	2N	Y	C1	>10	Small tree growing within garden. (tag number 0643)	Remove.	3.36	35
6	Hybrid poplar	10	1.5	1.5	1.5	1.5	71								0	-	S	C2	>10	Part of a row of Lombardy poplar in south-west corner of site. Has been topped in the past. Internal decay likely to be present.	Remove.	8.52	228
7	Row of Lombardy poplar	13av		2av			70av								0	-	S	C2	>10	Row of trees in south-west corner of site. Have been topped in the past. Some stem failure from those past pruning points. Internal decay likely and one stump confirms that has been present in trees removed.	Remove.	8.40	222
8	Norway maple	13	6	5	6	6								20	6	2	2N	S	B1	>20	Established tree growing to west of wall.	Crown lift to 5m above site side.	5.88	109
9	Pair of silver birch	11av		3av			12av								2	2S	Y	C2	>10	Pair of small trees growing beyond wall	Crown lift to 5m above site side.	1.44	7
10	Silver birch	13	3	3	2	2	25e								2	2N	Y	C1	>10	Young tree growing to west of wall.	Crown lift to 5m above site side.	3.00	28
11	Cherry	6	4	4	4	4		19	16	15	14	13			2	2N	Y	C1	>10	Small multi stemmed tree. (tag number 0649)	Remove.	4.17	55
12	Apple	4	2	3	2	3	30e								1	1S	S	C1	>10	Small tree smothered in ivy.	Remove.	3.60	41
13	Purple Norway maple	6	5	4	3	3	30e								2	2E	Y	C1	>10	Small tree growing close to wall. Lower stem smothered in ivy.	Crown lift to 3m above proposed path.	3.60	41
14	Norway maple	12	5	6	6	5	31								4	4S	S	C1	>10	Broad spreading tree but lacking vitality. (tag number 0650)	Remove.	3.72	43
15	Goat willow	12	6	7	5	6								18	6	0	2W	S	U	<10	Multi- stemmed tree. Primary failure between north-westerly stems. Other stems liable to failure. Coppicing could enable retention and regeneration. (tag number 0652)	Remove.	5.29	88
16	Ash	11	3	2	4	3		18	16						2	2S	Y	C1	>10	Small twin-stemmed tree growing against wall. (tag number 0655)		2.89	26
17	Crack willow	14	6	5	4	3		34	29						2	2E	S	C1	>10	Small twin-stemmed tree growing close to wall. Has been crown reduced in the past. (tag number 0656)	Remove.	5.36	90
18	Group of Lombardy poplar	9av		1av			25av								0	-	Y	C2	>10	Group of pollarded stems adjoining baseball court. Some stems dead or decaying. (tag numbers include 0657 / 0658 / 0659 /0660 / 0661 / 0662 / 0663 / 0664	Remove.	3.00	28
19	Lime	13	4	5	5	4	33								1	2N	S	B1	>20	Well formed young tree growing close to basket ball court.	Remove.	3.96	49
20	Cherry	12	6	3	2	4		27	26						2	2N	S	C1	>10	Small twin-stemmed tree growing close to building. Poor fork formation. (tag number 0666)	Remove.	4.50	64
21	Norway maple	10	2	3	2	2	14								2	2N	Y	C1	>10	Small tree growing against fence. (tag number 0667)		1.68	9
22	Ash	10	2	1	1	2		13	14						3	3W	Y	C1	>10	Small tree growing against base of wall. (tag number 0668)		2.29	17
23	Group of Lombardy poplar	11av		2av			20av								3	3E	Y	C2	>10	Group of slender stems adjoining baseball court. No tree of any particular merit. (Includes tag numbers 0669 / 0670 / 0671 / 0673 / 0674 / 0675)	Remove 2 stems as shown.	2.40	18
24	Apple	5	2	1	2	2	13								2	2N	Y	C1	>10	Small tree growing against wall.		1.56	8
25	Group of Lombardy poplar	14av		3av			70av								2	2E	S	U	<10	Previously reduced in height. Extensive pockets of decay within the main stem. Unsuited to long-term retention. (tag numbers 0676 / 0677 / 0680)		8.40	222
26	Group of Norway maple	12av		3av			13av								3	3N	Y	C2	>10	Group of slender stems growing against wall. (Tag numbers include 0678 / 0679)		1.56	8
27	Lombardy poplar	13	1	1	1.5	1	23								4	4N	Y	C1	>10	Slender tree growing between two larger specimens. (tag number 0686)		2.76	24
28	Lombardy poplar	15	5	3	0	3	31								2	2N	Y	U	<10	Crown biased toward the north. Stem has caused failure of the boundary wall. Small pocket of decay at circa 2 metres above ground level.		3.72	43
29	Lombardy poplar	14	2	3	2	1	91								2	2S	E	U	<10	Extensive decay in main stem. Previously reduced in height. Decaying fungal fruit bodies emerging from cavities. (tag number 0688)		10.92	375
30	Row of Lombardy poplar	13av		2av			30av								0	-	S	U	<10	Row of trees that have been reduced in the past. Most appear to be decayed, and some exhibit fungal fruit bodies. Some appear to be offshoots from trees that have been felled in the past. (tag numbers 0689 - 0697)		3.60	41
31	Row of Lombardy poplar	15av		2av			35av								0	-	S	C2	>10	Row of trees growing within grounds to north of site.		4.20	55
32	Goat willow	10	2	2	3	2	19								0	-	Y	C1	>10	Small tree of slender form. (tag number 0698)	Remove.	2.28	16
33	Lombardy poplar																	U	<10	Dead (tag number 0699)	Remove.	0.00	0
34	Pair of Lombardy poplar	12av		1av			20av								3	3S	Y	C2	>10	Pair of slender trees that have probably grown from root stock of prior trees (tag numbers 0700 / 0701)	Remove.	2.40	18
35	Lombardy poplar	14	2	3	4	2		19	31	13					2	2S	Y	C1	>10	Small tri-stemmed tree growing towards baseball court. Has been crown reduced in the past. (tag number 0702)	Remove.	4.63	67
36	Norway maple	13	3	7	7	3		12	26	21					2	2S	Y	C1	>10	Small tree growing along old fence line. Some chain link fence is incorporated within the stem. (tag number 0703)	Remove.	4.26	57
37	Lombardy poplar	13	2	2	1.5	1	63								3	3S	S	U	<10	Has been crown reduced. Decay is likely to be present within the main stem. (tag number 0704)	Remove.	7.56	180
38	Group of Lombardy poplar	15av		2av			30av								5	5S	Y	C2	>10	Collection of slender stems growing between building and fence. (tag numbers 0705 / 0706 / 0709)	Remove 3 stems as shown.	3.60	41
39	Ash	14	3	4	6	3	29								4	4S	Y	C1	>10	Small tree growing close to building. (tag number 0707)	Remove.	3.48	38
40	Rowan	9	2	4	3	1								10	6	3	3E	Y	C1	>10	Small multi-stemmed tree growing close to building.	Remove.	2.94	27
41	Group of ash	12av		3av			20av								3	3S	Y	C2	>10	Group of slender stems between building and fence.	Remove.	2.40	18
42	Mixed broadleaf hedgerow	10av		3av			15av								0	-	S	C2	>10	Established row of trees on land to north of site. Species include hawthorn, privet and hornbeam. Several stems growing through the fence.	Cut back to boundary.	1.80	10
43	Pair of Norway maple	12av		4av			20av								2	2S	Y	C2	>10	Pair of slender trees growing between building and fence. (tag numbers 0714 / 0715)		2.40	18
44	Norway maple	14	6	7	7	6	44								2	2N	S	C1	>10	Small tree growing between sports court and fence. (tag number 0716)	Cut back southern side by circa 4m.	5.28	88
45	Hawthorn	3	1	2	2	2	25e								2	2S	Y	C1	>10	Small tree growing close to fence. Some branches touching netting around ball court.		3.00	28
46	Silver birch	5	1.5	3	2	2	19								1.8	1.8E	Y	U	<10	Distinct lack of vitality. (tag number 0718)		2.28	16
47	Silver birch	11	4	5	4	3	37								2	2N	S	U	<10	Distinct lack of vitality with extensive crown die back. (tag number 0719)	Cut back southern side by circa 2m.	4.44	62
48	Hawthorn	7	2	3	2	2		29	14						2	2N	Y	C1	>10	Small tree growing between ball court and fence. (tag number 0721)		3.86	47
49	Callery pear	9	4	4	5	4	33								2	2W	Y	C1	>10	Small tree growing amidst tarmac surround.	Crown lift to 3m above proposed ground level.	3.96	49
50	Sycamore	3	1	1	1	1	12								2	2N	Y	C1	>10	Stunted growth. Growing in tarmac surround.	Crown lift to 3m above proposed ground level.	1.44	7
51	Callery pear	11	5	4	4	4	35								2	2N	Y	C1	>10	Small tree growing in tarmac surround. Lacking vitality.	Crown lift to 3m above proposed ground level.	4.20	55
52	Norway maple	13	6	6	5	6	46								2	2NW	S	C1	>10	Established tree growing in lawn. Small undersized leaves indicate the tree is lacking vitality. (tag number 0726)		5.52	96
53	Cherry	10	7	6	6	6	35								2	2N	Y	C1	>10	Small tree growing in lawn. Lacking vitality. (tag number 0730)	Crown lift to 3m above proposed ground level.	4.20	55
54	Weeping beech	6	5	4	4	4	38								2	2W	S	C2	>10	One of a pair of similar trees. (tag number 0726)		4.56	65
55	Weeping beech	7	3	4	5	2	41								2	2S	S	C2	>10	One of a pair of similar trees. (tag number 0727)	Crown lift to 3m above proposed ground level.	4.92	76
56	Norway maple	9	5	5	5	2	34								2	2N	Y	C1	>10	Small tree growing in car park. Some decay at past pruning points. (tag number 0732)		4.08	52
57	Olive	7		3av			15								0	-	Y	C2	>10	Small tree growing just beyond boundary.		1.80	10
58	Row of mixed broadleaves	9av		3av			15av								0	-	Y	B2	>20	Established belt of small trees along boundary. Includes some larger sycamore.		1.80	10
59	Purple plum	9	5	5	5	5								12	8	1.5	1.5N	Y	C1	>10	Small tree growing in farm.		4.07	52
60	Almond	8	4	4	4	4								10	10	1.5	1.5N	Y	C1	>10	Small tree adjoining pond.		3.79	45
61	Sycamore	11	5	5	4	5								15	10	2	2N	Y	C1	>10	Multi-stemmed tree growing along fence-line. (tag number 0735)		5.69	102
62	Cherry	11	5	4	3	4	30e									2	2N	Y	C1	>10	Small tree growing along fence-line. Ivy smothered stem. (tag number 0734)		3.60	41
63	Silver birch	10	3	4	3	3	37									2	2N	S	U	<10	Extensive crown dieback and loss of central leader. Unsuited to long term retention.	Remove.	4.44	62

Figure 1: Example of a protective barrier



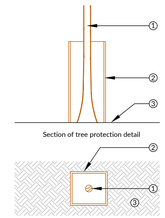
1. Steel mesh panel
2. Connectors fitted to secure panels
3. Diagonal strut
4. Block feet to avoid driven scaffold poles
5. Block tray weighted with blocks

Figure 2: Typical ground protection detail



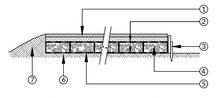
1. Existing ground
2. Geotextile membrane eg. Terram 1000 or similar
3. Compression-resistant layer (e.g.100mm depth of woodchip)
4. Robust sheets (timber, steel, recycled plastic) overlying Terram 1000 or similar
5. Where wider than one sheet stagger joints

Figure 3: Timber boxing to protect tree trunk



1. Trunk of tree
2. Plywood box, typically 2.4m high, width to accommodate trunk
3. Existing ground level

Figure 4: Typical detail of 'no-dig' surfacing



1. Surface material to engineer's specifications
2. Geotextile separation fabric as specified by engineers
3. Treated timber edging supported on timber posts or concrete gravel boards supported on concrete spur posts if required
4. 40/20mm clean angular stone
5. Cellular confinement system to engineer's specification and depth
6. Existing ground levels retained (no excavation)
7. Soil fillet can be used at edges

NORTH

0 10m 20m 50m

NOTES

1. **This tree survey information has been prepared for planning purposes only. Additional detail will be needed for foundation design.**
2. The original of this drawing was produced in colour – a monochrome copy should not be relied upon.
3. Scale for planning purposes only.
4. All dimensions to be checked on site.
5. The copyright of this document resides with Keen Consultants unless assigned in writing by the company.
6. Details shown on this drawing are devised with reference to BS5837:2012 *Trees in relation to design, demolition and construction - Recommendations.*
7. Check if Tree Preservation Order or Conservation Area protection applies to trees before undertaking tree works.
8. Topographical survey based on MK Surveys project number 26940.
9. Where trees were not identified on the topographical survey they have been plotted by eye.
10. Proposed layout based on Exterior Architecture Landscape General Arrangement Plan drawing number 2274-EXA-ZZ-00-DR-L-10200 Rev 01.

KEY

- Existing site features
- Proposed layout
- Trees retained (Green-coloured line indicates extent of canopy)
- Trees for removal (Red-coloured dash line indicates extent of canopy)
- 2.0m high barrier as detail in Figure 1 (Temporary, for the duration of works)
- Area of ground protection as detail in Figure 2
- Timber boxing as detail in Figure 3
- Minimum extent of no-dig construction. Actual deployment may be greater. As detail in Figure 4

KEY TO TREE SCHEDULE

Column Heading	Explanation
Tree No.	Unique number corresponding with number on plan
Species	English names
Ht (m)	Height in metres
Branch Spread	Crown radius in metres to cardinal points of the compass
Stem Dia	All measurements conform to Annex C of BS 5837:2012 Single stem - Stem diameter in centimetres measured at 1.5m above ground level. Multi-stemmed tree with 2 to 5 stems - Diameter of each stem Multi-stemmed tree with more than 5 stems - Average stem diameter and number of stems
Height of crown clearance	Height in metres between the ground and underside of canopy
Height of first major branch and direction of growth	Height from ground level to base of first major branch and the approximate direction of growth
Abbreviations as suffix to a dimension	Suffix 'e' denotes an estimated dimension
Age Class	Suffix 'av' denotes an average dimension Age Class definitions: Y = Young S = Semi-mature E = Early mature M = Mature O = Over mature
Category grading	Summary of BS 5837: 2012 categorisation: 1. Trees unsuitable for retention: U = those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer that 10 years 2. Trees to be considered for retention: A1, 2 or 3 = trees of high quality (substantial contribution >40 yrs) B1, 2 or 3 = trees of moderate quality (significant contribution >20 yrs) C1, 2 or 3 = trees of low quality (but adequate, ie >10 yrs or young trees - until new planting can be established)
Estimated remaining contribution (yrs)	Note: Useful estimated remaining contribution of the tree or tree group based on figures stated in BS5837:2012
Condition	Brief description including physiological and structural defects
Tree Works	Works required to be undertaken to the trees to facilitate the construction or remediate a defect encountered during the survey.
Root Protection Radius	Radius of minimum root protection area in metres calculated from section 4.6 and Annex D of BS5837:2012
Root Protection Area	Total area of minimum root protection area extrapolated from root protection radius

Rev	Description	Date
A	Trees retention removal updated	22.10.25
0	Preliminary issue	20.10.25

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Client
LONDON SQUARE

Project
PHOENIX ACADEMY,
THE CURVE, LONDON

Title
TREE PROTECTION PLAN

Date	Scale
OCTOBER 2025	1:500@A0
Drawn by	Checked by
ML	JTK

Drawing Number
2512-KC-XX-YTREE-TPP01RevA

APPENDIX C CONDITION ASSESSMENTS

The highlighted green text below indicates which condition has been achieved for each habitat.

Baseline Habitats

Grassland - Modified grassland

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	There are 6-8 vascular plant species per m2 present, including at least 2 forbs. Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m2, please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	No	Habitat dominated by *Lolium perenne* with no other herbs or grasses present at significant density.
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No	Sward height is uniformly 5cm long
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble *Rubus fruticosus* agg. may be present).	Yes	No scrub present

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	No	Damage present from trampling
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	No	Damage present from trampling
F	Cover of bracken *Pteridium aquilinum* is less than 20%.	Yes	No bracken present
G	There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA).	Yes	No INNS present
Essential criterion achieved (Yes or No)			No
Number of criteria passed			3
Condition Assessment Result (out of 7 criteria)	Condition Assessment Score	Score Achieved ×/✓	
Passes 6 or 7 criteria including passing essential criterion A	Good (3)		
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)		

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
Passes 4 - 6 criteria (excluding criterion A)	Poor (1)	x	

Individual Trees - Urban Trees

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	The tree is a native species (or at least 70% within the block are native species).	No	Approximately 45% of trees within block are native
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	Individual trees automatically pass this criterion
C	The tree is mature (or more than 50% within the block are mature)1.	No	Majority of trees are less than semi-mature
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 trees retain >75% of expected canopy for their age range and height.	No	Majority of trees show sign of adverse impacts from anthropogenic sources
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Yes	These features are present on many individual trees

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Yes	True for majority of trees
Number of criteria passed		3	
Condition Assessment Result (out of 6 criteria)	Condition Assessment Score	Score Achieved ×/✓	
Passes 5 or 6 criteria	Good (3)		
Passes 3 or 4 criteria	Moderate (2)	x	
Passes 2 or fewer criteria	Poor (1)		

Line of trees

Condition Assessment Criteria			Criterion passed (Yes or No)	Notes (such as justification)
A	At least 70% of trees are native species.		No	Majority of trees in line are non native

Condition Assessment Criteria			Criterion passed (Yes or No)	Notes (such as justification)
B	Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.		No	>10% of the length features gaps in the canopy
C	One or more trees has veteran features and or natural ecological niches for vertebrates and invertebrates, such as presence of standing and attached deadwood, cavities, ivy or loose bark.		Yes	Whilst none of the trees in the line are veteran, the older Lombardy poplars possess deadwood and ivy
D	There is an undisturbed naturally-vegetated strip of at least 6 m on both sides to protect the line of trees from farming and other human activities (excluding grazing). Where veteran trees are present, root protection areas should follow standing advice2.		Yes	There is modified grassland on both sides of the tree line for at least 6m
E	At least 95% of the trees are in a healthy condition (deadwood or veteran features valuable for wildlife are excluded from this). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.		Yes	Besides trees showing veteran features (i.e. mature Lombary poplar), remaining trees are in good condition
Number of criteria passed				3
Condition Assessment Result (out of 5 criteria)		Condition Assessment Score	Score Achieved ×/✓	
Passes 5 criteria		Good (3)		
Passes 3 or 4 criteria		Moderate (2)	x	
Passes 2 or fewer criteria		Poor (1)		

Post-Development

Grassland - Modified grassland (moderate condition)

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	There are 6-8 vascular plant species per m2 present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m2 (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	Yes	Proposed lawn will include sufficient diversity
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No	Sward height will be kept uniformly short
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble may be present).	Yes	Scrub will be managed and removed

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	No	Grassland will be protected from trampling/physical damage
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Yes	Grassland will be protected from trampling/physical damage
F	Cover of bracken is less than 20%.	Yes	No bracken present on site
G	There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA).	Yes	INNS will be managed and removed where encountered
Essential criterion achieved (Yes or No)			Yes
Number of criteria passed			6
Condition Assessment Result (out of 7 criteria)	Condition Assessment Score	Score Achieved ×/✓	
Passes 6 or 7 criteria including passing essential criterion A	Good (3)		

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)	x	
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)		

Urban - Biodiverse green roof

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.	Yes	

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
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.	Yes	
C	Invasive non-native plant species (listed on Schedule 9 of WCA) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area.	Yes	
Additional Criterion - must be assessed for Biodiverse green roofs only:			
G	The roof has a varied depth of 80 – 150 mm; at least 50% is at 150 mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. Note – to achieve Good condition some additional habitat, such as sand piles, stones, logs etc. are present.	Yes	

Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):		
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C.	Good (3)	x

Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓
• 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)	

Urban - Intensive green roof

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.	Yes	
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.	Yes	
C	Invasive non-native plant species (listed on Schedule 9 of WCA) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area.	Yes	

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
Additional Criterion - must be assessed for Intensive green roofs only:			
F	The roof has a minimum of 50% native and non-native wildflowers. 70% of the roof area is soil and vegetation (including water features).	No	

Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):		
• 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)	x
• Passes 0 or 1 of 3 core criteria.	Poor (1)	

APPENDIX D RELEVANT LEGISLATION AND POLICY

D.1 LEGISLATION

The BNGA has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:

- UK Government's 25 Year Environment Plan (DEFRA, 2018);
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (DEFRA, 2011);
- National Planning Policy Framework (NPPF) (MHCLG, 2024);
- The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006);
- The Environment Act (DEFRA, 2021).

The Environment Act, 2021

Under the Environment Act, 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of off-site compensation, or the purchase of statutory credits.

The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the LPA.

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

Under the Act, the enhancements must be maintained for at least 30 years.

D.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2024[9] sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. Alongside this,

it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

Regional

The London Plan[10]

Policy G1 Green infrastructure

1. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.
2. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
3. Development Plans and Opportunity Area Planning Frameworks should:
    1. identify key green infrastructure assets, their function and their potential function
    2. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
4. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy G5 Urban greening

5. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
6. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. (excluding B2 and B8 uses).
7. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

Policy G6 Biodiversity and access to nature

8. Sites of Importance for Nature Conservation (SINCs) should be protected.
9. Boroughs, in developing Development Plans, should:
    a. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks

b. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them

c. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans

d. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context

e. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

10. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

    a. avoid damaging the significant ecological features of the site

    b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site

    c. deliver off-site compensation of better biodiversity value.

11. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

12. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

13. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.

14. In their Development Plans, boroughs should:

    a. Protect 'veteran' trees and ancient woodland where these are not already part of a protected site

    b. Identify opportunities for tree planting in strategic locations

15. Development proposals should ensure that, wherever possible, existing trees of quality are retained [Category A and B]. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

London Environment Strategy 2018[11]

The Mayor's Environment Strategy was published in May 2018. This document sets out the strategic vision for the environment throughout London. Although not primarily a planning

guidance document, it does set strategic objectives, policies and proposals that are of relevance to the delivery of new development in a planning context, including:

Objective 5.1 Make more than half of London green by 2050

Policy 5.1.1 Protect, enhance and increase green areas in the city, to provide green infrastructure services and benefits that London needs now.

This policy states:

"New development proposals should avoid reducing the overall amount of green cover and, where possible, seek to enhance the wider green infrastructure network to increase the benefits this provides. […] New developments should aim to avoid fragmentation of existing green space, reduce storm water run-off rates by using sustainable drainage, and include new tree planting, wildlife-friendly landscaping, or features such as green roofs to mitigate any unavoidable loss".

This supports the 'environmental net gain' approach promoted by government in the 25 Year Environment Plan.

Proposal 5.1.1.d The London Plan includes policies to green streets and buildings, including increasing the extent of green roofs, green walls and sustainable drainage.

Objective 5.2 conserving and enhancement wildlife and natural habitats

Policy 5.2.1 Protect a core network of nature conservation sites and ensure a net gain in biodiversity

This policy requires new development to include new wildlife habitat, nesting and roosting sites, and ecologically appropriate landscaping will provide more resources for wildlife and help to strengthen ecological corridors. It states:

"Opportunities should be sought to create or restore priority habitats (previously known as UK Biodiversity Action Plan habitats) that have been identified as conservation priorities in London [and] all land managers and landowners should take BAP priority species into account".

Local

Hammersmith and Fulham Local Plan[12]

Policy OS5: Greening the borough

The council will seek to enhance biodiversity and green infrastructure in the borough by:

a. Maximising the provision of gardens, garden space and soft landscaping, seeking green or brown roofs and other planting as part of new development;

b. Protecting back, front and side gardens from new development and encouraging planting in both back and front gardens;

c. Seeking to prevent removal or mutilation of protected trees;

d. Seeking retention of existing trees and provision of new trees on development sites;

e. Adding to the greening of streets and the public realm; and

f. Making Tree Preservation Orders where justified in the interests of amenity.

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