

Highgate Conservation Area Advisory Committee

SUPPLEMENTAL OBJECTION TO HGY/2023/0315: Richards Centre

This is the supplemental objection of Highgate Conservation Area Advisory Committee ("HCAAC") to deal with the failure properly to evaluate biodiversity gains for this application.

At Appendix 4 of its Ecological Impact Assessment, the applicant's consultant (Arbtech) referred to the requirement for a biodiversity net gain plan under the Environment Act 2021. However, Arbtech incorrectly stated that the principal tool to calculate this was the Defra Biodiversity Metric 3.0. The relevant metric at the time Arbtech's assessment was produced in October 2022 was, in fact, Defra Biodiversity Metric 3.1 (which was introduced in April 2022). In addition, not only has the applicant failed to take into account the relevant metric at the time the assessment was produced, but also it has failed to update its assessment to take into account the latest Defra Biodiversity Metric 4.0 (which was introduced in March 2023).

Under the Natural Environment and Rural Communities Act 2006 requires Councils to have regard to biodiversity conservation when carrying out their duties.