Biodiversity Net Gain Exemption Statement

Prepared for planning submission

Units 5 and 5a, 83-95 Hainault Road, Romford RM5 3AH
Prepared by Ian Stephenson, Stephensons
5 November 2026 | BNG P02

Ground floor and associated application land only. The first floor is excluded.

1 Exemption claimed

The application claims exemption from mandatory biodiversity net gain. The proposal changes use and internal fit-out within an existing commercial building and retains the existing forecourt and access surfaces. It affects no vegetated habitat or linear habitat. It therefore falls within the de minimis exemption, provided no on-site priority habitat is impacted. The small-site exemption in regulation 7A additionally applies to an application made after 6 August 2026 where the complete application site is no larger than 0.2 hectares.

Site and development

The proposal changes the ground-floor commercial use within an existing building and uses associated existing external application land. It includes no extension, new floor, roof works, new hardstanding or vegetation clearance. The first floor is excluded. Its floor area is not part of the proposed use and must not be added to the land area when testing the exemption.

Criterion	Application position
Habitat affected	No proposed loss or degradation of area habitat or linear habitat; existing building and hard surfaces retained.
Application date	The intended application is after 6 August 2026.
Priority-habitat impact	No removal, clearance or change to any priority habitat is proposed by the defined building and forecourt reuse.
Scope	Ground-floor use and associated application land only. No first-floor change of use or works.

Area and exemption basis

The enclosed unit boundary on drawing 26_174_01 is approximately 291 square meters and the defined development affects no habitat.

2 Habitat effects and declaration

No habitat intervention proposed

The submitted design retains the building envelope and does not propose ground clearance, tree work, planted-area loss or new surfacing. The claimed exemption is tied to that scope. It does not authorise removal of vegetation, priority habitat or protected-species features as part of refurbishment or plant installation.

The plan identifies a developed building and associated external space; it does not provide a botanical survey. The operator must not extend waste storage, installation works or temporary working areas onto vegetated land without reassessing the effects. Any such change may require revised biodiversity information.

Application land and habitat effects

The exemption covers the defined building use and reuse of existing hard surfaces. The unit, allocated car spaces and retained estate access involve no proposed habitat clearance or degradation. The de minimis route concerns the habitat affected by development; it is not a reason to omit necessary land from the application boundary.

Application declaration

For the defined scheme, the biodiversity gain planning condition is considered not to apply because there is no impact on an on-site priority habitat and the development affects less than 25 square metres of area habitat and less than 5 metres of linear habitat. No habitat loss is proposed. This de minimis claim is supported by the internal-only fit-out, retained existing access and parking surfaces and absence of ground or vegetation works. A statutory metric or gain plan is therefore not submitted.

Other ecological duties remain applicable, including protection of species and relevant habitats. This statement does not certify the absence of bats, nesting birds or other protected features within parts of the building that are not affected by the proposal.