BIODIVERSITY NET GAIN REPORT
Royal Central School of Speech and Drama

Client Reference: Allan Joyce Architects Ltd
Assystem E&I Ltd. Reference: PRJ0012495

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Document Approval

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Date : 11/09/2024	**Date : 11/09/2024**	**Date : 11/09/2024**
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Contents

1. Executive Summary

Purpose

This report provides a Biodiversity Net Gain (BNG) assessment for proposed works at the Royal Central School of Speech and Drama in London, demonstrating the delivery of a net gain for biodiversity through the development in line with national and local planning policies.

Introduction

The Proposed Development site is located at the Royal Central School of Speech and Drama, Eton Avenue, London, NW3 3HY (National Grid Reference for the centre of the site TQ 26696 84375). The c. 2,716 m^2 site currently comprises an existing building (the Norman Collins building) with associated hardstanding, grassland and landscaping, with development proposals seeking to replace the existing building with a new proposed Centre for Performance Technology and Equity (PTEQ).

Key Findings

The development proposals, as currently proposed, will deliver a net gain for area-based habitats when comparing the developed site against the pre-construction baseline.

Retention of the adjacent urban trees to the site are an important aspect of the delivery of a net gain for biodiversity, demonstrating an application of the mitigation hierarchy, alongside the delivery of a range of semi-natural habitats on the site.

Defra's Statutory Biodiversity Metric was utilised to calculate the delivery of net gain of biodiversity, with the current proposals delivering an increase of 15.31 % in habitat units.

Recommendations

The assessment has been based on a precautionary principle in places, and as the design develops changes to the landscaping and additional detail will be made available that could alter the assessment. Therefore, consideration should be given to the influence of changes to the landscaping to ensure continued delivery of a net gain for biodiversity.

As the delivery of a net gain is dependent on the successful retention of tree habitats, the implementation of appropriate protection measures for urban trees, in line with British Standard 5837 (2012) – 'Trees in Relation to Design, Demolition and Construction', is of significant importance.

Consideration should also be given to maximising biodiversity potential on the site, as discussed, for example through tailoring green roof habitats for the delivery of biodiversity enhancement.

Conclusion

The development proposals therefore meet national and local planning policy requirements to deliver a net gain for biodiversity. Furthermore, the proposals demonstrate that the Proposed Development can exceed on the delivery of a 10 % net gain for biodiversity specified in the Environment Act 2021.

Planning Application Template Section 9 Questions	
Date the pre-development biodiversity value of on-site habitat(s) was calculated:	16/08/2024
Pre-development biodiversity value of on-site habitats:	0.07 habitat units
Version of biodiversity metric used and date published:	Statutory Biodiversity Metric – 02/2024
Has there been any loss (or degradation) of any on-site habitat(s), resulting from activities carried out before the date the on-site pre-development biodiversity value was calculated either: a. On or after 30th January 2020 which were not in accordance with a planning permission; or, b. On or after 25th August 2023 which were in accordance with a planning permission? NB: If yes, please provide detail including: the date immediately before this activity was carried out; the onsite biodiversity value on this date; and any supporting evidence (or reference to relevant document containing these details)	a. No b. No
Does the application site have irreplaceable habitat(s) (corresponding to the descriptions in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) which exist on land to which this application relates which existed on the date of the application for planning permission?	No

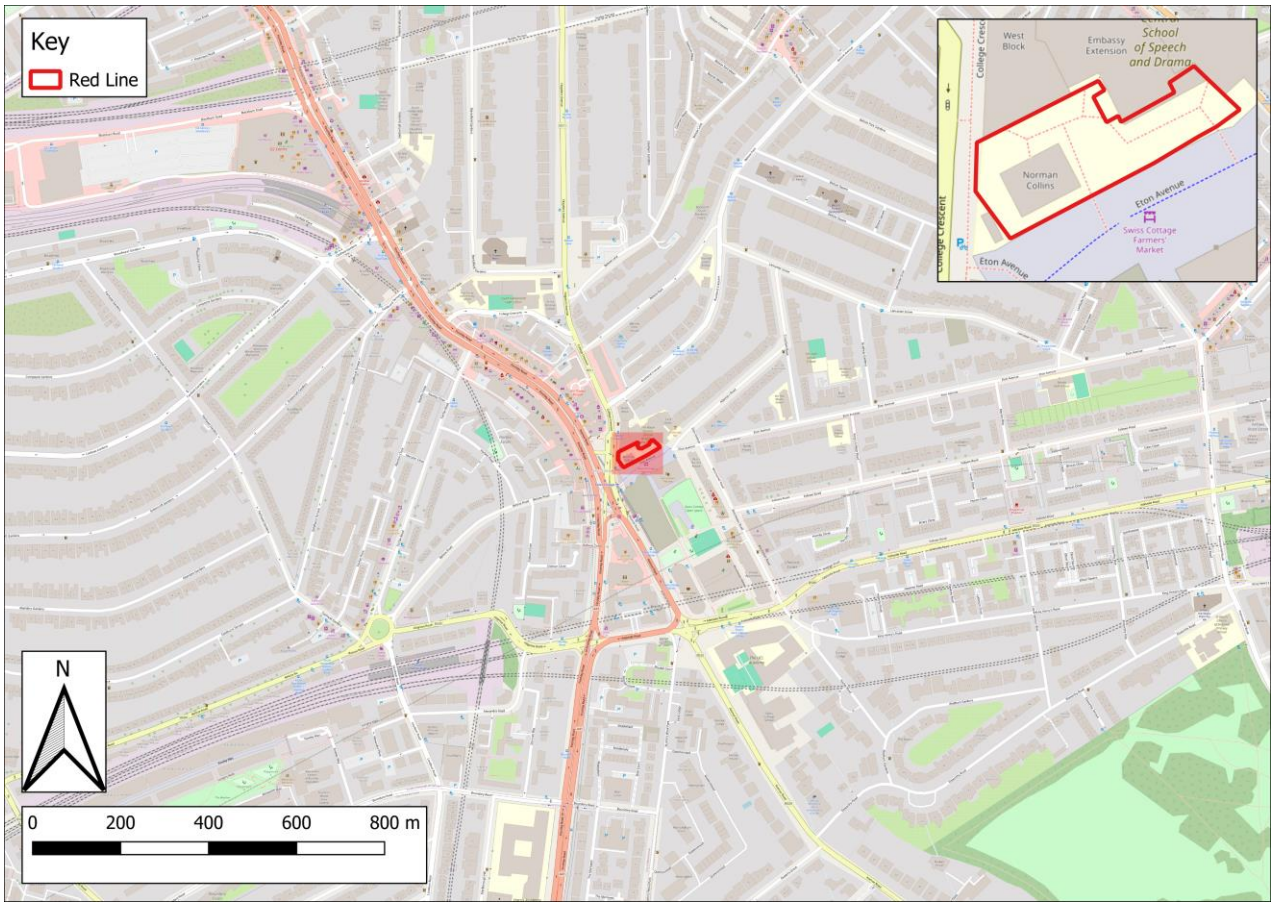
2. Introduction

2.1.1 This Biodiversity Net Gain (BNG) assessment has been prepared by Assystem, on behalf of Allan Joyce Architects Ltd, to accompany a planning application for works at the Royal Central School of Speech and Drama in London. Proposed works include the replacement of the existing Norman Collins building with a new proposed Centre for Performance Technology and Equity (PTEQ) ('the site'). The site is within the London Borough of Camden.

2.2 Background Information

2.2.1 The Proposed Development site is located at the Royal Central School of Speech and Drama, Eton Avenue, London, NW3 3HY (National Grid Reference for the centre of the site TQ 26696 84375). The location of the site is identified in Figure 1. The site is situated in an urban area in the Belsize Park area of Hampstead.

Figure 1 Location of the Proposed Development (Contains map data from © OpenStreetMap)



2.2.2 The c. 2,716 m^2 site comprises an existing building (i.e., the Norman Collins building) with associated hardstanding. An area of modified grassland is present in the eastern side of the site, with mostly empty planters on and adjacent to the grassland. Three areas of introduced shrub are located around the periphery of the site.

2.2.3 The surrounding area comprises predominantly residential properties with associated vegetated gardens, including South Hampstead to the west and Belsize Park to the north and east. Approximately 700 m

south-east of the site lies Primrose Hill public park which is separated from The Regent's Park by Prince Albert Road and the ZSL London Zoo.

2.3 Purpose

2.3.1 The purpose of the BNG assessment is to identify the biodiversity enhancements incorporated within the Proposed Development and demonstrate how the proposed development delivers a net gain for biodiversity.

2.4 Biodiversity Net Gain

2.4.1 Biodiversity enhancement is inherent within the planning process, in accordance with the National Planning Policy Framework (NPPF)[1], proposals should seek to demonstrate BNG. The NPPF states in Paragraph 186d that "[…] *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*".

2.4.2 The requirement to deliver a net gain for biodiversity cascades into local planning requirements. The London Plan[2] states "*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*".

2.4.3 Local planning policy, provided by the Camden Local Plan[3], includes Policy A3 'Biodiversity' which states that the Council will protect and enhance sites of nature conservation and biodiversity. This will be achieved in part through assessment of developments to assess their ability to realise benefits for biodiversity through the layout, design and materials used. In addition, the Council will seek to secure additional trees and vegetation wherever possible, stating that it should be feasible to incorporate biodiversity enhancing measures within developments. The Plan states that "*all development should install green roofs, permeable landscaping, green walls and combination green and blue roofs, where appropriate*" to provide habitat and support a sustainable approach to drainage.

2.4.4 The new Draft Camden Local Plan[4] Policy NE2 'Biodiversity' states that the "*Council will seek to ensure that development protects and enhances nature conservation and biodiversity in the Borough*". On sites that are already fully built on, the Councill will "*seek to negotiate biodiverse green roofs in all suitable developments and 'features' such as bird and bat boxes/artificial bat roosts*". It also states that proposed mitigation measures should be delivered on-site, unless it can be demonstrated that this is not achievable. In line with the Environment Act 2021, as amended 2024[5], the Plan requires BNG of at least 10% with gains secured for at least 30 years.

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1 *Ministry of Housing, Communities and Local Government (2023) National Planning Policy Framework.*
2 *City of London Corporation (2021) The London Plan. Spatial Development Strategy for Greater London. March 2021.*
3 *Camden (2017) Camden Local Plan. Available at: https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6 (Accessed 21/08/2024).*
4 *Camden (2024) Draft New Camden Local Plan. Available at: https://www.camden.gov.uk/documents/20142/4820180/Draft+New+Camden+Local+Plan+2024+v1.pdf/415cc7da-c24a-8237-ddc2-5c72045af9d2?t=1706548115256 (Accessed 21/08/2024).*
5 *Environment Act 2021. His Majesty's Stationery Office (HMSO).*

2.4.5 The Camden Biodiversity Strategy[6] sets out a vision for Camden along with key objectives which will be achieved by establishing a Nature Recovery Network and new Biodiversity Action Plan. The Biodiversity Strategy aspires to create stepping-stones and corridors of habitat through the borough whilst also improving and expanding existing habitat.

2.4.6 Camden BeeLine[7] is a community project in collaboration with Camden Council that aims to increase green spaces and biodiversity across the Borough of Camden by creating a connected pollinator pathway to link up green spaces.

2.4.7 This BNG assessment will follow the 10 principles for BNG assessments as established by the Chartered Institute of Ecology and Environmental Management (CIEEM) and Construction Industry Research and Information Association (CIRIA) joint publication[8]. The ten best practice principles are as follows:

- **Principle 1 -** Apply the Mitigation Hierarchy: Do everything possible to first avoid and then minimise impacts on biodiversity.
- **Principle 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.
- **Principle 3 -** Be inclusive and equitable: Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain.
- **Principle 4 -** Address risks: Mitigate difficulty, uncertainty and other risks to achieving Net Gain.
- **Principle 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.
- **Principle 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.
- **Principle 7 -** Be additional: Achieve nature conservation outcomes that demonstrably exceed existing obligations.
- **Principle 8 -** Create a Net Gain legacy: Ensure Net Gain generates long-term benefits.
- **Principle 9 -** Optimise sustainability: Prioritise BNG and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
- **Principle 10 -** Be transparent: Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

2.5 Quality Assurance

2.5.1 All Assystem ecologists are members of (at the appropriate level) CIEEM and follow their code of professional conduct when undertaking ecological work.

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6 *Camden (2022) Camden Biodiversity Strategy.*
7 *Camden Clean Air Initiative (n.d.) Camden BeeLine.*
8 *CIRIA (2019) Biodiversity net gain. Good practice principles for development. A practical guide. CIRIA Report C776a. CIRIA, London.*

2.5.2 All staff members are committed to establishing and maintaining our certification to the following international standards:

- British standard, European norm, and international standard for quality management systems published in 2015 (BS EN ISO 9001:2015);
- British standard, European norm, and international standard for environmental management systems published in 2015 (BS EN ISO 14001:2015); and,
- British standard, European norm, and international standard for occupational health and safety management systems published in 2018 (BS EN ISO 45001:2018).

2.5.3 Assystem are a CIEEM Registered Practice, and as such champion high professional standards whilst delivering the best outcomes for biodiversity and supporting a thriving economy.

3. Methodology

3.1.1 The BNG assessment has been completed using the Statutory Biodiversity Metric, an auditing and accounting tool for biodiversity. The assessment has been completed using the Statutory Biodiversity Metric calculator[9], in line with the accompanying User Guide[10] and information contained within the Technical Annexes.

3.1.2 The value of the pre-development site has been established based on the findings of the baseline habitat survey, reported in the Preliminary Ecological Appraisal (PEA) (document reference: 'PRJ0012495 – PEA'), whilst the post-development habitats have been identified based on the proposed landscape drawings (Drawing no. 104). The baseline habitat map is included in Appendix A and the landscape plan is included in Appendix B.

3.1.3 Informed by the above, the habitat type, area (ha) and condition score are entered into the metric for each parcel of habitat present within the Proposed Development site. The habitat condition scores for the baseline have been established in the field survey, whereas for the post-development habitats the condition has been assessed using professional judgement to determine an appropriate condition.

3.1.4 A 'Strategic Significance' score is then assigned to each habitat parcel. The assessment of strategic significance is based on local planning policy in the first instance. For example, if the site is located within a designated wildlife corridor, within the local biodiversity action plan, National Character Area or Local Nature Recovery Strategy (LNRS) then it would be of 'High Strategic Significance'. Areas of 'Medium Strategic Significance' would be classified as areas not formally designated, but which could be important for protected species. 'Areas of Low Strategic Significance' are those which do not meet the above criteria. The criteria are identified in Table 1.

[9] *Defra (2024) The Statutory Biodiversity Metric – Calculation Tool. February 2024. Department for Environment, Food and Rural Affairs.*
[10] *Defra (2024) The Statutory Biodiversity Metric – User Guide. February 2024. Department for Environment, Food and Rural Affairs.*

Table 1 Strategic Significance and Details

Category	Criteria
High Strategic Significance	Where there is a published LNRS, - the location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and, - the intervention is consistent with the potential measure proposed for that location. *or* Where there is no published LNRS and the habitat type is mapped and described as locally ecologically important within a specific location, within documents specified by the relevant planning authority. If your project delivers the mapped measure set out in the LNRS or alternative strategy (where the LNRS is not yet available) you should: - record strategic significance as low in the baseline; - record strategic significance as high in post-intervention sheets; - record which plan you have used in the user comments.
Medium Strategic Significance	This category cannot be applied where the LNRS is published, or where the habitat and location is included within other strategic documents specified by the relevant planning authority. Users should: - explain how the habitat type is ecologically within a specific location; - demonstrate the importance of that habitat in providing ecological linkage to other strategically significant locations; - use professional judgement.
Low Strategic Significance	Where the definitions for high and medium strategic significance are not met. Even if your project is within a plan area, if it does not deliver the specific actions outlines in these plans you should: - record strategic significance as low in the baseline; - record strategic significance as low in post-intervention sheets.

3.1.5 Based on the above information, the metric then calculates Biodiversity Units for each habitat parcel and a total number of Biodiversity Units for the proposed location for potential development.

3.2 Limitations and Constraints

3.2.1 Full BNG calculations using the metric approach cannot be fully completed until post-construction. This will then generate the BNG final calculations to determine if BNG has been achieved. The proposed works submitted for planning permission provide a good representation of the BNG which can be achieved by the Proposed Development in line with the proposed installations.

3.2.2 Whilst the Statutory Biodiversity Metric uses a structured approach to calculating BNG, it does not represent a complete tool for assessing BNG, therefore professional judgement and other sources of guidance have been used where appropriate.

3.2.3 Despite the limitations described, there are deemed to be no significant limitations to this assessment.

4. Results

4.1 Baseline

4.1.1 The PEA identified the baseline environment to be relatively typical of an urban environment, dominated by buildings and hardstanding with introduced ornamental planting. The habitats present within the baseline comprise the following:

- **Urban - Developed land; sealed surface**: c. 1,865 m^2 - areas of buildings and hardstanding are included under this category;
- **Urban – Introduced shrub**: c. 84 m^2 - areas of ornamental shrub planting around the periphery of the site, including vegetated planters, are included within this category;
- **Urban** – **Bare ground**: c. 140 m^2 - planters devoid of vegetation are included within this category;
- **Urban – Urban tree**: four trees adjacent to the site may be impacted by the development and have therefore been included within this category;
- **Grassland – Modified grassland**: c. 628 m^2 - the area of grassland to the east of the site is included within this category.

4.1.2 The habitat condition, required only for the urban trees, modified grassland and bare ground categories, has been considered in line with the respective habitat condition sheets within the Technical Supplement document supporting the Biodiversity Metric. The condition has been considered as per the following, with the condition assessment sheets provided in Appendix B:

- **Urban – Urban tree**: the four trees adjacent to the site were not native species (fails Criterion A), had continuous canopy cover (individual trees automatically pass Criterion B), were mature (passes Criterion C), with little or no anthropogenic impacts (passes Criterion D), did not contain natural ecological niches (fails Criterion E) and was not predominantly oversailing vegetation (fails Criterion F).
- **Urban – Bare ground**: areas of bare ground do not have a varied vegetation structure (fails Criterion A), does not contain different plant species that are beneficial to wildlife (fails Criterion B), and detrimental and invasive non-native plant species account for less than 5% of the vegetated area (passes Criterion C). This habitat therefore passes one criterion and achieves poor condition.
- **Grassland – Modified grassland**: the grassland has fewer than 6 vascular plant species per square metre and therefore fails the criterion essential for achieving moderate or good condition (fails Criterion A). The sward hight is not varied (fails Criterion B), scrub accounts for less than 20% (passes Criterion C), physical damage is evident in more than 5% of the area (fails Criterion D), bare ground accounts for more than 10% (fails Criterion E), cover of bracken is less than 20% (passes Criterion F), and there is an absence of invasive, non-native plant species (passes Criterion G). The grassland therefore passes three criteria, however, as essential Criterion A has not been achieved, the grassland achieves a poor condition.

4.1.3 The results of the baseline habitat assessment are identified in Table 2, with the baseline value for area-based habitats being 0.07 habitat units. As there are no watercourses or linear habitats within the development site, these are filtered out of the assessment. The full calculation is included in Appendix C.

Table 2 Biodiversity Value of Baseline Habitats

Habitat Type	Area (ha)/ Length (m)	Distinctiveness	Condition	Strategic Significance	Suggested Action to Address Habitat Losses	Total Baseline Habitat Units
Area-Based Habitats						
Developed land; sealed surface	0.0727	Very Low	N/A - Other	Area/compensation not in local strategy/no local strategy	Compensation not required	0.00
Introduced shrub	0.0045	Low	Condition Assessment N/A		Same distinctiveness or better habitat required	0.01
Bare ground	0.0054	Low	Poor			0.01
Modified grassland	0.0727	Low	Poor			0.05

4.2 Development Implications

4.2.1 Application of the mitigation hierarchy is an important aspect of the delivery of BNG, ensuring significant or important habitats can be retained and protected through construction and not using the methodology to enable the loss of high value habitats. Consideration has, therefore been given to the development proposals and baseline habitats, however the majority of the habitats on site are of low ecological value.

4.2.2 Therefore, whilst the Proposed Development will require the removal of all the semi-natural habitats within the development site, the proposals allow for the urban trees surrounding the site to be retained and protected through the construction. This is achieved through the adoption of mitigation measures outlined in British Standard 5837[11].

4.2.3 Although the baseline habitats on-site will be removed, they will be replaced by like for like habitats or better which will significantly increase the biodiversity value of the site.

4.3 Enhancements

4.3.1 The following identifies the enhancements that have been incorporated into the building design to increase habitat opportunities and deliver a net gain for biodiversity. The habitats provided have been identified based on the landscaping proposals, using professional judgement and following a precautionary principle where relevant.

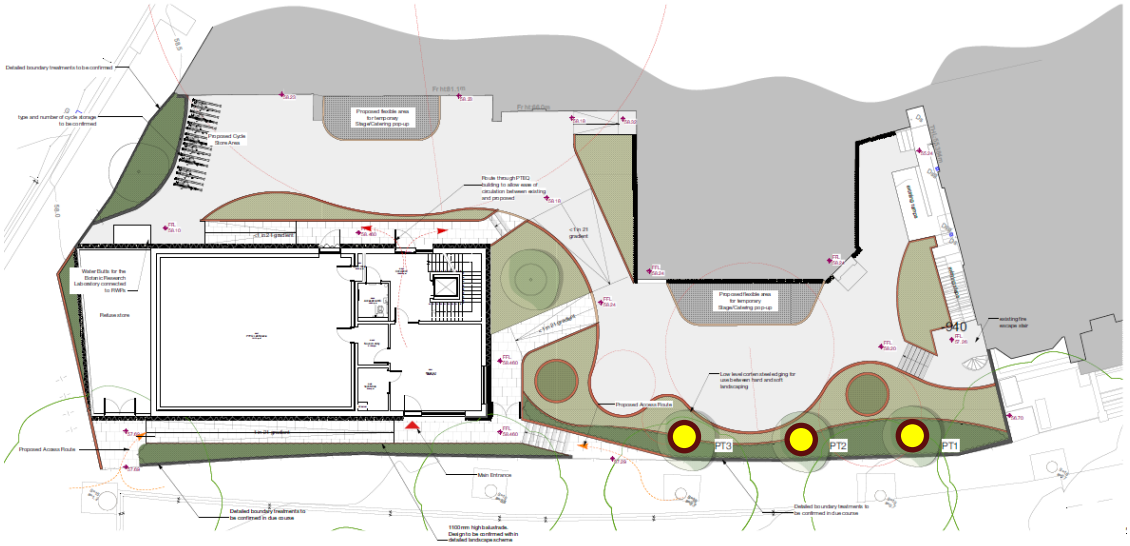
[11] *British Standards Institute (2012) British Standard 5837:2012 – Trees in Relation to Design, Demolition and Construction – Recommendations. BSI, London.*

Public Realm

4.3.2 The Proposed Development provides a good opportunity for the establishment of landscaping across the public realm to create areas of amenity. There are four main habitat types within the public realm, the extent of which are identified in Figures 2, which are discussed below and identify the condition identified for each:

- **Modified grassland** (light green in Figure 2) – comprising areas of amenity lawn in the public realm area of the development site, considered to achieve a poor condition as a conservative estimate as the habitat may not achieve Criterion A which requires 6 species per m2 which is an essential requirement for moderate/good condition;
- **Introduced shrub** (dark green in Figure 2) – comprising areas of ornamental planting (species composition to be confirmed) acting as a buffer between the street and the site. The Defra metric does not require a condition to be identified for this habitat type;
- **Ground level planters** (dark green circles in Figure 2) – comprising areas of ornamental planting (species composition to be confirmed) located in raised beds within the site. The Defra Metric does not require a condition to be identified for this habitat type;
- **Urban trees** (yellow circles in Figure 2) – three trees are proposed for planting. All trees are identified to be of poor condition as a conservative estimate, passing Criterion 2 (default), with some also passing Criterion 6 (oversailing vegetation) Criterion 1 (native species).

Figure 2 Extent of Public Realm Landscaping in the Proposed Development (from Drawing no. 104)



Species Enhancement

4.3.3 The biodiversity value of the Proposed Development can be further enhanced through the provision of artificial habitat enhancements such as bird boxes, bat roosts and nesting aids for invertebrates. Whilst such features are not included in the Biodiversity Metric calculation, inclusion of these can have a notable impact on the site. CIRIA guidance identifies that the inclusion of such enhancements can make a valuable contribution to providing alternative wildlife refuges, enhancing the biodiversity value of buildings and

development sites cheaply and easily[12]. However, the success of the establishment of species within the boxes is dependent on the availability of the right conditions in the locality, these are the four basic components of habitat: food, cover, water and space[13].

Breeding Birds

4.3.4 The value of bird boxes on the site can be increased through a targeted provision towards those species of conservation concern alongside the provision of more general multi-species boxes. As a result, it is recommended that provision targets house sparrow and swift along with general species boxes that incorporate both cavity nesting opportunities and open fronted nest boxes.

4.3.5 It is recommended that boxes are made of Woodcrete, as this is a durable, rot-proof and breathable material and have been shown in studies to result in higher occupation rates than traditional boxes. Appropriate location and fixing of boxes should be identified in consultation with an experienced ecological consultant, and where possible should consider opportunities to be incorporated within the building fabric.

Invertebrates

4.3.6 The value of invertebrate species within habitats cannot be underestimated, with species providing a range of vital ecosystem services that include pollination of flowers and recycling of nutrients. As a result, it is important to ensure appropriate sheltering opportunities are included within the development to support a healthy population on the site.

4.3.7 The introduced shrub/ground level planters should include areas of bare ground and sand mounds for solitary bees, and artificial nesting aids should be included in the developed site. The type and location should be identified in consultation with an experienced ecologist.

Biodiversity Value of the Developed Site

4.3.8 Based on the landscaping proposals outlined above, the biodiversity value of the final Proposed Development would deliver, on a conservative basis, a total of 0.08 habitat units. The breakdown of this for each habitat type is identified in Table 3. The full calculation is included in Appendix C.

[12] *Newton, J., Gedge, D., Early, P. and Wilson, S. (2007) Building Greener – Guidance on the use of green roofs, green walls and complementary features on buildings. CIRIA C644.*

[13] *Velazquez, L. S. (2005) Organic green roof architecture. Sustainable design for the new millennium. Environmental Quality Management, 14, pp 73-85.*

Table 3 Proposed Development Habitat Value

Proposed Habitat	Area (ha)/ Length (m)	Distinctiveness	Condition	Strategic Significance	Time to Target Condition	Difficulty	Total Baseline Habitat Units
Area-Based Habitats							
Developed land; sealed surface	0.0838	Very Low	N/A	Area/compensation not in local strategy/no local strategy	0	Low	0.00
Introduced shrub	0.0082	Low	N/A		1	Low	0.02
Ground level planters	0.0010	Low	N/A		1	Low	0.00
Modified grassland	0.0142	Low	Poor		1	Low	0.03
Urban tree[14]	0.0122	Medium	Poor		10	Low	0.03

4.4 Change in Biodiversity Value

4.4.1 Considering the identified baseline habitat and enhancement proposals for the final developed site, the development will deliver a post development habitat value of 0.08 habitat units, comprising a 15.31 % increase in value when compared to the baseline. The change in value is set out in Table 4.

Table 4 Proposed Development Habitat Value

Type	Baseline Habitat Value	Value of Habitat Lost	Value of Habitat Retained	Value of Habitat Enhanced	Value of Habitat Created	Total Post-Development Habitat Value	Percentage Change
Area-Based Habitats	0.07	0.07	0.00	0.00	0.08	0.08	+15.31 %

[14] In line with the Biodiversity Metric methodology, the tree area has been calculated using the Tree Helper Tool within the metric calculation tool.

5. Conclusions

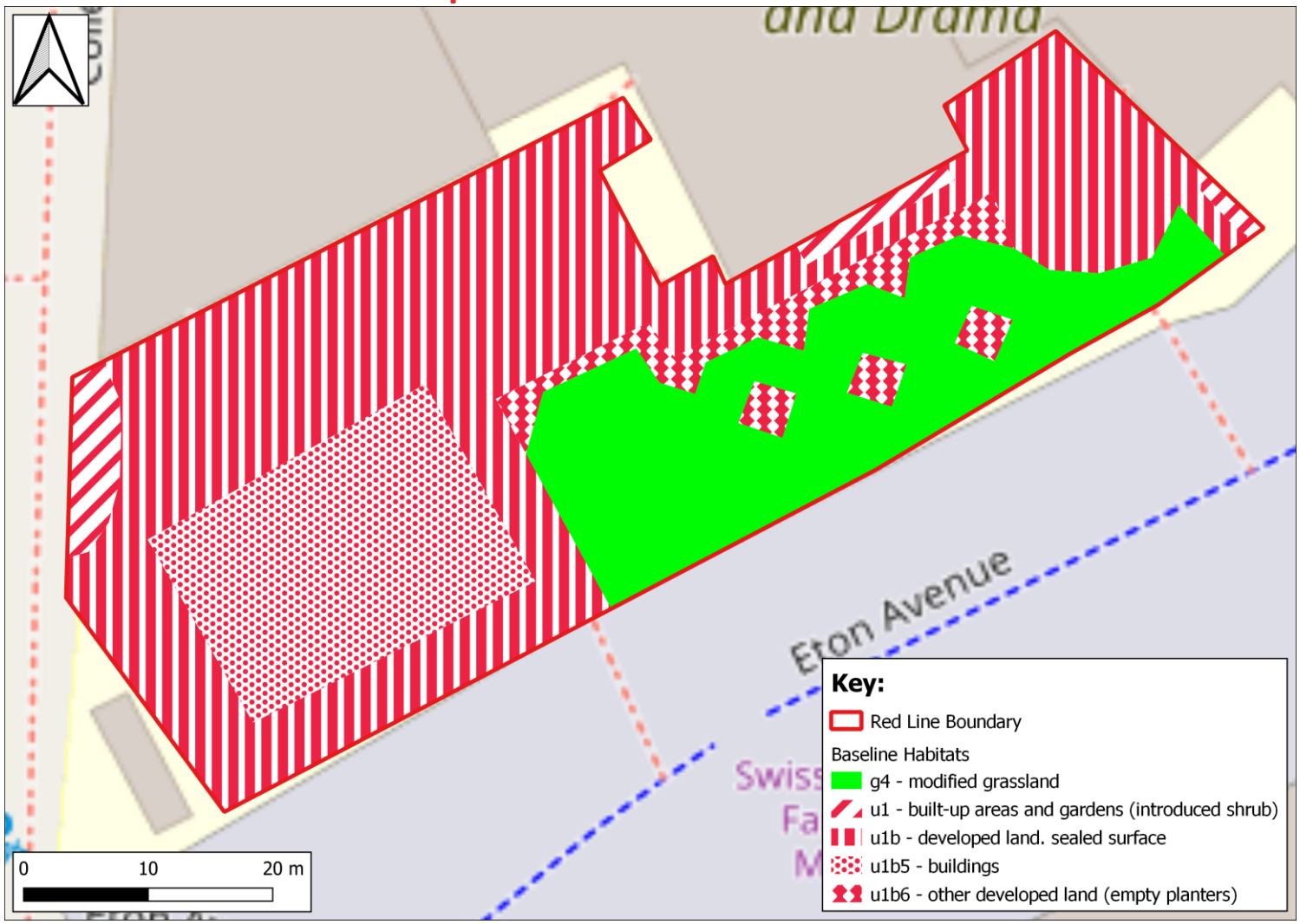
5.1.1 The Proposed Development will deliver a net gain for biodiversity, with an increase in habitat units of 15.31 % when compared to the baseline. The development proposals therefore meet national and local planning policy requirements to deliver a net gain for biodiversity. Furthermore, the proposals demonstrate that the development can exceed the delivery of a 10 % net gain for biodiversity specified in the Environment Act 2021.

5.1.2 Delivery of the habitats proposed should be completed at an appropriate time in the construction process, so as to not comprise a constraint to ongoing development and will require monitoring and maintenance through the construction phase. Similarly, the delivery of net gain is reliant upon the implementation of mitigation measures to protect retained vegetation, in this case the adjacent urban trees. As such, protection measures along with measures associated with the delivery and maintenance of the habitats should be incorporated within a Construction Environmental Management Plan.

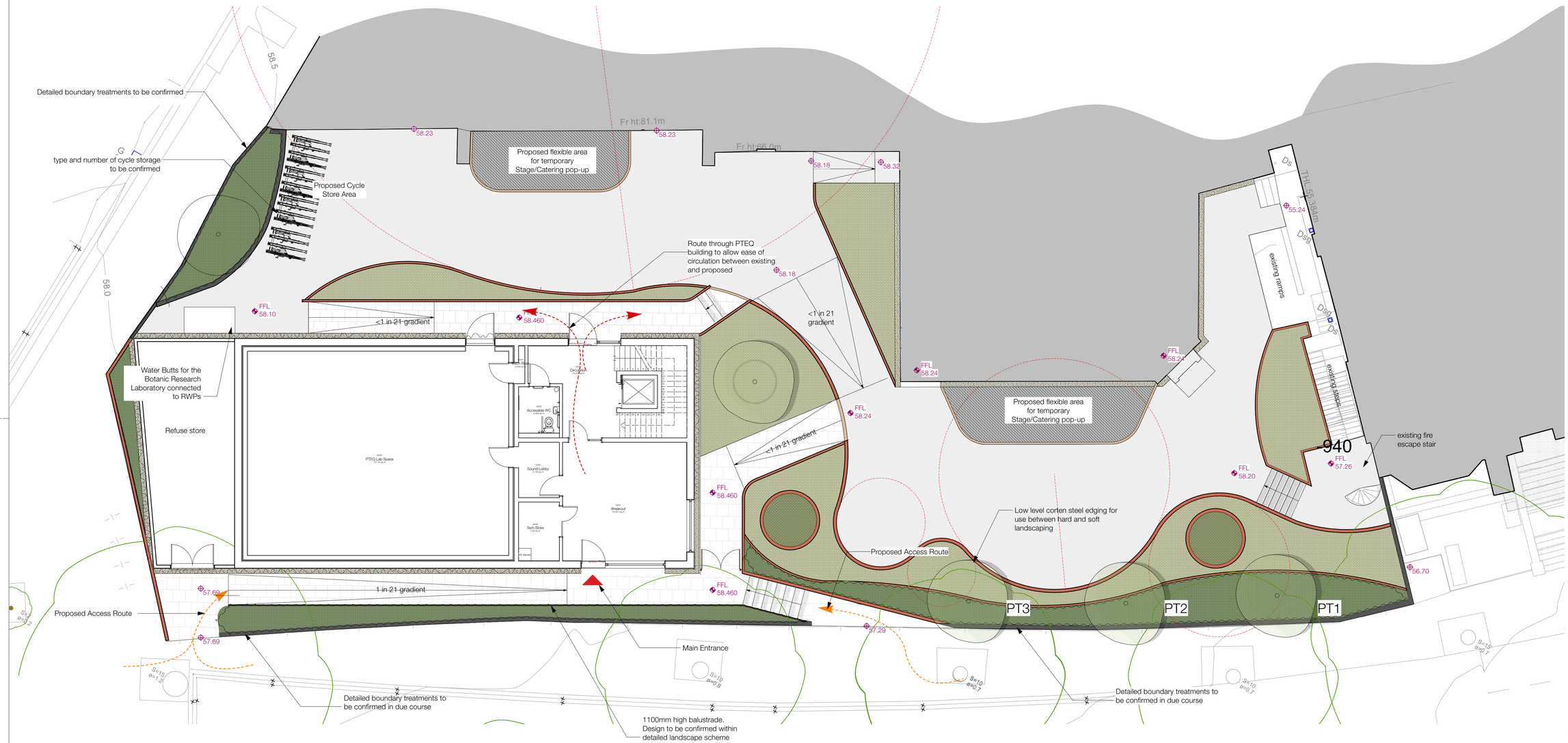
5.1.3 Similarly, maintenance of habitats is required to ensure the habitats maximise their biodiversity potential through the operational phase of the development. To ensure the habitats are able to maximise this potential and essential maintenance tasks are carried out, a long-term management plan should be adopted prior to completion that covers the habitats in the public realm and the green roofs associated with the apartment buildings. As the vegetated gardens will form part of a private residence, these would be excluded from such a plan.

6. Appendices / Annexes

Appendix A Baseline Habitat Maps



Appendix B Landscape Plan



Landscape Design - Phase 1

Scale: 1:100

0 1 2 3 4 5 M

KEY

PT1 — Number and type of trees for indicative purposes only. Selection and maturity of plant species will be made to achieve Biodiversity Net Gain (BNG) objectives.

Indicative areas of soft landscaping. Ornamental planting/screening species TBC. Selection of plant species will be made to achieve Biodiversity Net Gain (BNG) objectives

Corten Steel edging to create raised beds. Design to be confirmed

Corten Steel Edging (Above Ground & Retaining Border) for use between planted areas and pathways.

Paving Slab - exact type to be confirmed

Paving Slab or Coloured Tarmac - to be confirmed

Revision: Date: By:

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Client: **RCSSD**

Project: **RCSSD PTEQ**
Eton Ave, Belsize Park, London NW3 3HY

Drawing package: **Stage 3**

Drawing title: Proposed Landscape Design

Drawing status: Preliminary

Scale: 1:100 @ A1 Date: 08/08/2024 Drawn: MLD

Project no: **4194** Package ref: Drawing no: **104** Revision:

Print Size Check 40 mm

Appendix C Habitat Condition Sheets

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)			
UK Habitat Classification (UKHab) Habitat Type			
Grassland - Modified grassland			
On-site or off-site, site name and location	On-site	**Survey date and Surveyor name**	16/08/2024 - Dominic Martens and Poppy Anson
Limitations (if applicable)		**Survey reference (if relating to a wider survey)**	
Grid reference	TQ26708437	**Habitat parcel reference**	
Habitat Description			
ukhab – UK Habitat Classification			

	Condition Assessment Criteria	Criterion passed (Yes or No)	Notes (such as justification)
A	There are 6-8 vascular plant species per m^2 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 m^2 (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.	No	
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	
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). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Yes	
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	
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)[2].	No	
F	Cover of bracken *Pteridium aquilinum* is less than 20%.	Yes	
G	There is an absence of invasive non-native plant species[3] (as listed on Schedule 9 of WCA[4]).	Yes	
	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)		
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)	x	

Suggested enhancement interventions to improve condition score

Footnotes

Footnote 1 – Creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, curled dock *Rumex crispus*, broad-leaved dock *Rumex obtusifolius*, common nettle *Urtica dioica*, creeping buttercup *Ranunculus repens*, greater plantain *Plantago major*, white clover *Trifolium repens* and cow parsley *Anthriscus sylvestris*.

Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.

Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.

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

Appendix D Defra Metric Calculation

Project details			
Planning authority:			
Project name:	Royal Central School of Speech and Drama		
Applicant:			
Application type:			
Planning application reference:			
Completed by:	Dominic Martens		
Date of metric completion:	11 September 2024		
Reviewer:			
Calculation iteration:			
Planning authority reviewer:			
Date of planning authority review:			
Target % net gain:	10%		
Irreplaceable habitat present at baseline:	No ✓		
Total site area - including irreplaceable habitat area (hectares):	0.11	Irreplaceable habitat site area (hectares):	0.00
Total off-site area - including irreplaceable habitat area (hectares):	N/A	Irreplaceable habitat area off-site (hectares):	N/A

Project Name: Royal Central School of Speech and Drama Map Reference:

A-1 On-Site Habitat Baseline

Condense / Show Columns

Condense / Show Rows

Main Menu

	Existing area habitats			
Ref	Broad Habitat	Habitat Type	Irreplaceable habitat	Area (hectares)
1	Grassland	Modified grassland	No	0.0245
2	Urban	Introduced shrub	No	0.0045
3	Urban	Bare ground	No	0.0054
4	Urban	Developed land; sealed surface	No	0.0727
5				
6				
7				
8				
9				
			Total habitat area	0.11
			Site Area (Excluding area of individual trees, green walls, intertidal hard structures)	0.11

Area habitat summary	
Total Net Unit Change	0.01
Total Net % Change	15.31%
Trading Rules Satisfied	Yes ✓

Distinctiveness	Condition	Strategic significance	Required Action to Meet Trading Rules	Ecological baseline	
Distinctiveness	Condition	Strategic significance		Total habitat units	Area retained
Low	Poor	Area/compensation not in local strategy/ no local strategy	Same distinctiveness or better habitat required ≥	0.05	
Low	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	Same distinctiveness or better habitat required ≥	0.01	
Low	Poor	Area/compensation not in local strategy/ no local strategy	Same distinctiveness or better habitat required ≥	0.01	
V.Low	N/A - Other	Area/compensation not in local strategy/ no local strategy	Compensation Not Required	0.00	
				0.07	0.00

Total area

Area enhanced	Baseline units retained	Baseline units enhanced	Area habitat lost	Units lost	Bespoke compensation agreed for losses of VHDH or irreplaceable habitat
	0.00	0.00	0.02	0.05	
	0.00	0.00	0.00	0.01	
	0.00	0.00	0.01	0.01	
	0.00	0.00	0.07	0.00	
0.00	0.00	0.00	0.11	0.07	

. lost (excluding area of individual trees, green walls and intertidal hard structures)	0.11

Comments		
User comments	Planning authority comments	Habitat reference number
empty planters		

Project Name: Royal Central School of Speech and Drama Map Reference:

A-2 On-Site Habitat Creation

Condense / Show Columns

Condense / Show Rows

Main Menu

Total Net Unit

Total Net % C

Trading Rules

Area Che

Ref	Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness
				Distinctiveness
1	Grassland	Modified grassland	0.0142	Low
2	Urban	Ground level planters	0.001	Low
3	Urban	Introduced shrub	0.0082	Low
4	Individual trees	Urban tree	0.0122	Medium
5	Urban	Developed land; sealed surface	0.0838	V.Low
6				
7				
8				
9				
10				
		Total habitat area	0.12	

Site Area (Excluding area of individual trees, green walls, intertidal hard structures)	0.11

Area habitat summary	
Change	0.01
Change	15.31%
Satisfied	Yes ✓
eck	Area Acceptable ✓

Post intervention habitats

Condition	Strategic significance	Temporal multiplier		Difficulty	Habitat units delivered
Condition	Strategic significance	Standard or adjusted time to target condition	Final time to target condition (years)	Final difficulty of creation	
Poor	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	1	Low	0.03
Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	1	Low	0.00
Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	1	Low	0.02
Poor	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	10	Low	0.03
N/A - Other	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	0	Low	0.00
					0.08

Comments		
User comments	Planning authority comments	Habitat reference number
3 proposed small trees		

Royal Central School of Speech and Drama

Return to results menu

Headline Results

Scroll down for final results ⚠

On-site baseline	*Habitat units*	0.07	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.08	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	*Habitat units*	0.01	15.31%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Off-site baseline	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	*Habitat units*	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.01	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	*Habitat units*	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	

FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.01
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	15.31%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Habitat units	10.00%	0.07	0.08	0.00	No additional area habitat units required to meet target ✓
Hedgerow units	10.00%	0.00	0.00	0.00	No additional hedgerow units required to meet target ✓
Watercourse units	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓

Appendix E Relevant Legislation

The Environment Act 2021

The focus of the Act is the "*…provision for targets, plans and policies for improving the natural environment…*" and its requirements are structured around a number of broad themes (noting this is not a comprehensive summary of the provisions):

Nature and biodiversity – Part 6 of the Act importantly makes provision for "*biodiversity gain in planning*" which will apply to applications under the Town & Countryside Act and the Planning Act. In addition, the responsibilities on Government or public bodies have changed, including through:

- strengthening the existing biodiversity duty;
- requiring biodiversity reports;
- setting up local nature recovery strategy areas;
- providing for national habitat mapping; and
- establishing species conservation and protect site strategies.

Section 98 and 99 introduce biodiversity gain requirements that make changes to the Town & Country Planning Act and The Planning Act. The commencement of these changes and whether secondary legislation will be required to enact them will have to be subject to legal interpretation and advice.

Conservation covenants– Part 7 of the Act makes provisions for conservation covenants which essentially support the "*biodiversity gain in planning*" concept by providing a mechanism through which any gains can be secured and managed. These come into force at the point that the Secretary of State "*by regulations appoints*".

The Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales. The Regulations provide for the designation and protection of 'European sites', the protection of 'European Protected Species', and the adaptation of planning and other controls for the protection of European Sites.

Under the Regulations, competent authorities (i.e. government departments and public bodies) have a general duty to have regard to the EC Habitats Directive and Wild Birds Directive. The Regulations place a duty on the Secretary of State to propose a list of sites which are important for either habitats or species (listed in Annexes I and II of the Habitats Directive respectively) to the European Commission. The Regulations also require the compilation and maintenance of a register of European sites, to include SACs and Special Protection Areas (SPAs) classified under Council Directive 79/409/EEC on the Conservation of Wild Birds (the Birds Directive). These sites form a network termed Natura 2000, now referred to as 'National Site Network'. The Regulations enable the country agencies to enter into management agreements on land within or adjacent to a European site, in order to secure its conservation.

The Regulations also provide for the control of potentially damaging operations, whereby consent from the country agency may only be granted once it has been shown through appropriate assessment that the proposed operation will not adversely affect the integrity of the site. When considering potentially damaging operations, the precautionary principle applies i.e. consent cannot be given unless it is ascertained that there will be no adverse effect on the integrity of the site.

The Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2, or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 4. However, these actions can be made lawful through the granting of licences by the appropriate authorities. Licences may be granted for a few purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority is satisfied that there are no satisfactory alternatives and that such actions will have no detrimental effect on wild population of the species concerned.

The Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) consolidates and amends pre-existing national wildlife legislation in order to implement the Bern Convention and the Birds Directive. It complements the Conservation of Habitats and Species Regulations 2017 (as amended), offering protection to a wider range of species. The Act also provides for the designation and protection of national conservation sites of value for their floral, faunal or geological features, termed Sites of Special Scientific Interest (SSSIs).

Schedules of the Act provide lists of protected species, both flora and fauna, and detail the possible offences that apply to these species.

Schedule 1 – Part 1 relates to birds and their young, for which it is an offence to intentionally or recklessly disturb at, on or near an 'active' nest. Schedule 1 – Part 2 relates to birds afforded special protection during the close season which is 1 February to 31 August (21 February to 31 August below high-water mark), but which may be killed or taken outside this period.

The Countryside and Rights of Way (CRoW) Act 2000

The CRoW Act, introduced in England and Wales in 2000, amends and strengthens existing wildlife legislation. Legislation detailed in the Wildlife and Countryside Act 1981 (as amended) places a duty on government departments and the National Assembly for Wales to have regard for biodiversity and provides increased powers for the protection and maintenance of SSSIs. The Act also contains lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.

The Natural Environment and Rural Communities (NERC) Act 2006

Section 40 of the NERC Act places a duty upon all local authorities and public bodies in England and Wales to promote and enhance biodiversity in all their functions. Sections 41 (England) and 42 (Wales) list habitats and species of principal importance to the conservation of biodiversity. These lists superseded Section 74 of the CRoW Act 2000.