From: Rosie Whicheloe @wildlondon.org.uk>

**Sent:** 19 November 2019 16:08

To: Henry, Kate

Cc: Tony Wileman MCIEEM

Subject: RE: 2019/4201/P - St Pancras Commercial Centre [planning application

comments]

Dear Katie,

On behalf of Camden BC, I have assessed the applications on Policy A3: Biodiversity, which aims to achieve an overall net gain for biodiversity and broadly on Policy CC1,2 and 3: Climate change, which aims to achieve resilience and adaptation in the face of a changing climate. I have the following comments:

INFORMATION: The information submitted provides good general descriptions on the nature of the site and how the new development will improve biodiversity. However, additional information will be needed and approved through the following conditions.

CONDITION: Prior to commencement, provide fuller details of the location, type and number of features of value to nesting bird, roosting bat and breeding invertebrates on the site.

CONDITION: Prior to commencement provide fuller information of the construction, substrate depth, species composition and dead-wood habitat proposed on the bio-solar roofs.

IINFORMATION: The existing trees to be lost are predominantly fruiting species (Hawthorn, Rowen, pear, cherry and apple). which provide foraging habitat for wildlife, particularly birds. The choice of replacement trees at street level makes sense, in that they are big-long lived trees that will provide better structure (canopy cover) then existing trees. But this does not compensation for the loss of food source.

CONDITION: Prior to commencement review planting strategy for public spaces, terraces and streets, to identify locations where fruiting trees could be added. E.g. Replacing low wildlife species such as Fatsia and Euonymus spp. Or adding additional fruiting tree within SUDs or new locations at street level (e.g. in the north-west corner behind Guard Rail or along western boundary).

CONDITION: Prior to commencement provide fuller details of the planting scheme, numbers, size and proposed management regime that considers how the site will be maintained and enhanced over the life-span of its use. Care should be taken to avoid simplifying or formalising the naturalistic, ecologically considered design arrangement proposed.

REASON (for all conditions above): To achieve a net gain for biodiversity as a result of development and comply with Camden Local Plan Policy A3.

CONDITION: Prior to commencement provide an assessment of the urban greening factor\_in relation to the London Plan's Policy G4 Urban greening, demonstrating how the development meets the GLA target of 0.4 for residential development.

REASON: To provide mitigation in the face of a changing climate and comply with Camden Local Plan Policies CC1,2, and 3.

Kind Regards, Rosie





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