Greengage

146-150 Royal College Street, Hartdixon
Biodiversity Impact Assessment, April 2021

QA

146-150 Royal College Street – Biodiversity Impact Assessment

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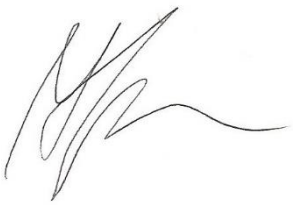
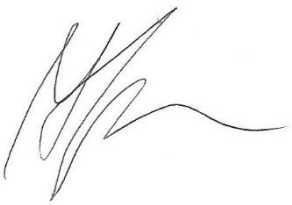
Signature:		
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1.0 EXECUTIVE SUMMARY

1.1 Greengage Environmental Ltd was commissioned to undertake a Biodiversity Impact Assessment by Hartdixon of a site at 146-150 Royal College Street in the London Borough of Camden.

1.2 This document is a report of this assessment and has been produced to support a planning submission for the site which seeks the development of a new build office.

1.3 The site is considered to have 0.03 baseline habitat given that it comprises mostly of hardstanding with a small area of introduced shrub.

1.4 Under the development proposals, the development stands to result in a **net gain of 0.05** biodiversity units associated with area-based habitats from pre-development levels. This exceeds the emerging mandate for a 10% net gain.

1.5 Detail on habitat creation should be provided within an Ecological Management Plan for the site, which could be secured through planning condition. Should these recommendations be adhered to, the proposals stand to be compliant with emerging legislation and existing planning policy.

2.0 INTRODUCTION

2.1 Greengage was commissioned to undertake a Biodiversity Impact Assessment (BIA) by Hartdixon of a site at 146-150 Royal College Street in the London Borough of Camden.

2.2 This document is a report of this assessment and has been produced to support a planning submission for the site which seeks the development of a new build office.

2.3 This assessment aimed to establish the change in ecological value of the site in light of the proposed development, taking into account direct and indirect impacts. Emerging legislation will mandate a 10% uplift in biodiversity value. This report will monitor compliance against this requirement.

SITE DESCRIPTION

2.4 The survey area extends to approximately 200m^2 and is centred on National Grid Reference TQ292840, OS Co-ordinates 529296, 184064.

2.5 The site mainly comprises hardstanding which is currently used as a car park for the adjoining office building to the east. There is a strip of introduced shrub and scattered trees along its northern boundary. Regent's Canal borders the site to the north with Royal College Street to the west.

2.6 The site is located in a heavily urbanised area of inner London. The wider landscape is dominated by residential and light industrial development.

ECOLOGICAL CONTEXT

2.7 A Preliminary Ecological Appraisal (PEA) of the site has been undertaken by Greengage.

2.8 This survey has provided the background ecological information for this BIA.

Preliminary Ecological Appraisal

2.9 The PEA site visit was undertaken on 16th April 2021 and included a desk study and Phase 1 habitat survey, following best practice guidance and methodology[1]. This survey sought to identify and classify habitats present on site and to identify the potential for the site to support notable and/or protected species.

2.10 The PEA identified the following habitats as present on site, as mapped in the Phase 1 Habitat Map in Figure 1:

- Hardstanding (J3.6.1); and
- Introduced shrub (J1.4) and scattered trees.

Figure 2.1 Brick paved hardstanding

Figure 2.2 Introduced shrub and scattered trees on the northern boundary of the site.

2.11 The PEA identified the presence of a Metropolitan SINC immediately adjacent to the site (Regent's Canal) as well as potential for the site to provide opportunity for foraging and commuting bats and nesting birds.

3.0 METHODOLOGY

DEFRA METRIC 2.0

3.1 To calculate the ecological value of the pre- and post-development sites, the DEFRA Metric 2.0 methodology was utilised, following best practice guidance from DEFRA[2,3] and joint guidance from CIEEM, IEMA and CIRIA[4].

3.2 This metric uses Biodiversity Units (separated into habitat, hedgerow and river units) as a proxy for the ecological value of area or linear based habitats. The areas of each habitat parcel are measured, with each parcel assigned a 'Distinctiveness' and 'Condition' score. Distinctiveness is a default score for that habitat classification, representing its inherent ecological value, whereas condition refers to the state each parcel is in relative to a predetermined set of criteria outlined in the supplementary Defra Metric 2.0 guidance.

3.3 For post-development habitat areas, additional multipliers are applied taking into account the time taken to reach maturity and difficulty of creation of the habitats, and whether the habitat creation is in a strategically beneficial location.

3.4 An assessment of the predicted change in ecological value is undertaken comparing the Biodiversity Units and assessing percentage change. Trading down of habitats (from higher to lower distinctiveness) is not permitted.

PRE-DEVELOPMENT CALCULATION

3.5 To calculate pre-development Biodiversity Units, data collected as part of the PEA and protected species surveys was assessed. Areas of each habitat type were taken from the Phase 1 Habitat Map (Figure 1) and data relating to the condition of habitat parcels was taken from existing reports.

3.6 As the PEA survey classified habitats using the JNCC Phase 1 Habitat Survey classification system, these were translated into the equivalent UK Habitat Classification system in line with guidance provided under the UK Habitat Classification system. Any deviation from these translations will be justified in full.

PROPOSED DEVELOPMENT CALCULATION

3.7 Drawings of the proposed development used for this assessment were:

- 1929_L_00_100_001

3.8 Areas of each habitat type were measured from these plans and targeted/likely condition scores used, taking into account the likely future use of each area.

COMPETENCIES

3.9 Sara Morris, who undertook the PEA site visit, has an undergraduate degree in Environmental Biology (BSc Hons) and over three years of experience in ecological surveying and consultancy.

3.10 Morgan Taylor, who reviewed this report, has a bachelors and master's degree in marine biology (MSci Hons), a Natural England CL17 Bat Survey Level 2 Class Licence (2015-7369-CLS-CLS) and CL10 Dormouse Survey Licence (2017-30817-CLS-CLS). Morgan is a Chartered Environmentalist, Full member of CIEEM and has over 10 years' experience in ecological surveying having undertaken assessments of numerous development sites of this type. He leads the Ecology team at Greengage.

3.11 This report was written by Sara Morris and reviewed and verified by Morgan Taylor 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.

CONSTRAINTS

3.12 The assessment methodology does not incorporate ecological features beyond area and linear based habitats. The potential for the site to support protected species, for example, is not captured by this assessment. As such this report should be read in conjunction with all other ecological reports for the site. The mitigation hierarchy in relation to protected and notable habitats and species must be followed. This report should accordingly be read in conjunction with the PEA and any other appropriate protected species surveys.

3.13 The BIA at this stage is predictive in nature. To ensure delivery of biodiversity net gains, requirements outlined within this report must be adhered to, and a rigorous programme of monitoring and maintenance must be implemented.

3.14 Exact detail of ground level soft landscaping is not included within this assessment, however the majority of habitat creation is associated with green roof provision, which is included within this assessment.

4.0 RESULTS

BASELINE CONDITIONS

4.1 The baseline biodiversity value of the site is calculated to be **0.03 biodiversity units**. A breakdown of this calculation is provided in Table 4.1 below:

Table 4.1 Baseline Biodiversity Units

Habitat Type	Area (Hectares)	Distinctiveness	Condition	Biodiversity Units
Developed land/sealed surface (hardstanding)	0.058	N/A	N/A	0.00
Introduced shrub	0.012	Low	Poor	0.03
			Total:	**0.03**

4.2 All habitats pre- and post-development have no multiplier added for strategic significance as the area is not located within a local strategy.

4.3 The pre-development site has no hedgerow units or river units. Hedgerows and rivers are not considered further within this report.

PROPOSED SITE LAYOUT

4.4 Based on masterplan drawings, the proposed development is predicted to generate **0.25 biodiversity units** for area-based habitats.

Table 4.2 Post-Development Biodiversity Units

Proposed habitat	Area (Hectares)	Distinctiveness	Condition	Biodiversity Units
Urban – Introduced shrub	0.005	Low	Poor	0.01
Urban – Brown roof	0.0134	Medium	Moderate	0.07
			Total:	**0.08**

4.5 All habitats post-development have no multiplier added for strategic significance as the area is not located within a local strategy.

4.6 To ensure the required biodiversity units are generated through this habitat creation, the post-development habitats must meet sufficient condition criteria to achieve the target condition. This should be detailed within an Ecological Management Plan (EMP) document which should be secured through planning condition.

5.0 EVALUATION AND DISCUSSION

5.1 Under the development proposals, and in the absence of additional enhancement measures and habitat creation, the development stands to result in a **net gain of 0.05** biodiversity units associated with area-based habitats from pre-development levels.

5.2 Local planning policy and emerging legislation mandates a 10% uplift in biodiversity units as a consequence of development. The percentage calculations show an uplift of 190.64%.

5.3 As detailed landscaping and roof design progresses, it is likely that minor alterations to the post-development habitat areas will be made. However, it has been demonstrated that a net gain for biodiversity will be delivered through incorporation of biodiverse roofs ('brown roof' being the closest habitat typology in the Defra metric to this roof specification) at site.

5.4 To ensure the biodiversity unit figures calculated and presented within this report are delivered on site, an EMP should be secured through planning condition. The EMP should also detail all protection/mitigation measures required for the proposed development, as covered in the accompanying protected species surveys.

6.0 SUMMARY AND CONCLUSION

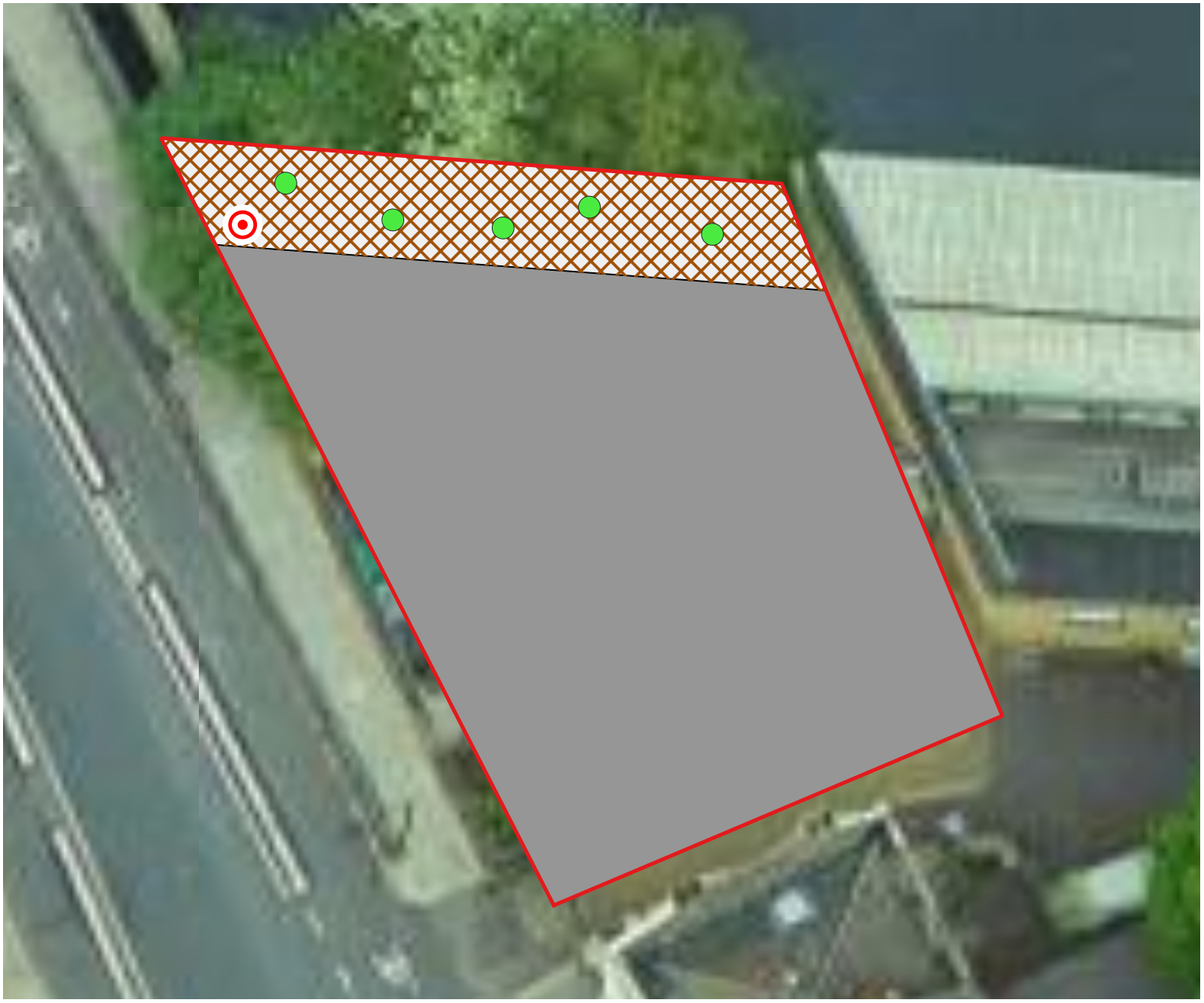
6.1 Greengage Environmental Ltd was commissioned to undertake a Biodiversity Impact Assessment by Hartdixon at a site known as 149-150 Royal College Street. This assessment sought to quantify the predicted change in ecological value of the site as a consequence of the proposed development

6.2 This report demonstrates that the development proposals will result in a net gain of 0.05 habitat units, which is considered meet the anticipated mandated net gain requirements associated with emerging legislation.

6.3 Details on the delivery of the ecological outcomes described in this report should be contained within an EMP for the site and should be secured through planning condition.

FIGURE 1 PHASE 1 HABITAT MAP

ROYAL COLLEGE STREET



Target Notes

Assessment boundary

Scattered trees

Habitats

J1.4 - Introduced shrub

J3.6.1 - Hardstanding

Greengage

9 Holyrood Street, London SE1 2EL

Fig 1.0 Site Plan and Habitat Map

Project Number 551370
April 2021

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APPENDIX 1 RELEVANT POLICY

PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2019[5] 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 2021[6]

Policy G1 Green infrastructure

A. 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.

B. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

C. 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.

Policy G2 London's Green Belt

A. The Green Belt should be protected from inappropriate development:

    1. development proposals that would harm the Green Belt should be refused

2. the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.

Policy G5 Urban greening

A. 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.

B. 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.

Policy G6 Biodiversity and access to nature

C. Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts:

1. avoid adverse impact to the special biodiversity interest of the site
2. minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site
3. seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.

D. Biodiversity enhancement should be considered from the start of the development process.

E. Proposals which create new or improved habitats that result in positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites.

Policy G7 Trees and woodlands

C. adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT. 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.

Supplementary Planning Guidance (SPG): Sustainable Design and Construction 2014

As part of the London Plan 2011 implementation framework, the SPG, relating to sustainable design and construction, was adopted in April 2014 and includes the following sections detailing Mayoral priorities in relation to biodiversity of relevance to The Site.

Nature conservation and biodiversity

The Mayor's priorities include ensuring 'developers make a contribution to biodiversity on their development Site'.

Overheating

Where priorities include the inclusions of 'measures, in the design of schemes, in line with the cooling hierarchy set out in London Plan policy 5.9 to prevent overheating over the scheme's lifetime'

Urban greening

A Priority is for developers to 'integrate green infrastructure into development schemes, including by creating links with wider green infrastructure network'.

Use less energy

'The design of developments should prioritise passive measures' which can include 'green roofs, green walls and other green infrastructure which can keep buildings warm or cool and improve biodiversity and contribute to sustainable urban drainage'.

London Environment Strategy 2018[7]

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

Camden Local Plan 2017

Policy CC1 Climate change mitigation

The council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. We will:

a. promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;

b. require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;

c. ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;

d. support and encourage sensitive energy efficiency improvements to existing buildings;

e. require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and

f. expect all developments to optimise resource efficiency. For decentralised energy networks, we will promote decentralised energy by:

g. working with local organisations and developers to implement decentralised energy networks in the parts of Camden most likely to support them;

To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment.

Policy A3 Biodiversity

The Council will protect and enhance sites of nature conservation and biodiversity. We will:

a. designate and protect nature conservation sites and safeguard protected and priority habitats and species;

b. grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species;

c. seek the protection of other features with nature conservation value, including gardens, wherever possible; Camden Local Plan | Protecting amenity 201

d. assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed;

e. secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;

f. seek to improve opportunities to experience nature, in particular where such opportunities are lacking;

g. require the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species;

h. secure management plans, where appropriate, to ensure that nature conservation objectives are met; and

i. work with The Royal Parks, The City of London Corporation, the London Wildlife Trust, friends of park groups and local nature conservation groups to protect and improve open spaces and nature conservation in Camden. Trees and vegetation The Council will protect, and seek to secure additional, trees and vegetation. We will:

j. resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation;

k. require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction' and positively integrated as part of the site layout;

l. expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development;

m. expect developments to incorporate additional trees and vegetation wherever possible.

REFERENCES

[1] JNCC (2010) Handbook for Phase 1 Habitat Survey.

[2] Ian Crosher, Susannah Gold, Max Heaver D, Matt Heydon, Lauren Moore, Stephen Panks, Sarah Scott, Dave Stone & Nick White (2019); The Biodiversity Metric 2.0: auditing and accounting for biodiversity value. User guide (Beta Version, July 2019). Natural England

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[5] GOV.UK. (2019). *National Planning Policy Framework*. [online] Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [Accessed 13 June 2019].

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[7] Greater London Authority (2018). *London Environment Strategy 2018*. London: Greater London Authority.