EUSTON TOWER
Biodiversity Survey & Report

December 2023

British Land

Greengage

Brighter strategies
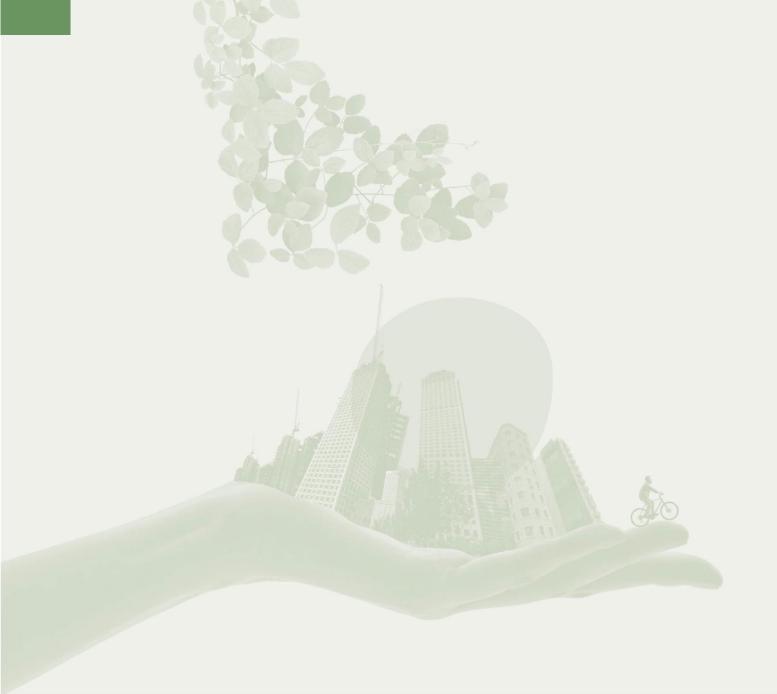for greener projects

Client: British Land Property Management Limited

Project: Euston Tower

Report: Biodiversity Net Gain Assessment

QUALITY ASSURANCE

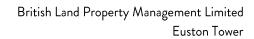| Issue/Revision:	Draft	Final
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1.0 EXECUTIVE SUMMARY

Greengage was commissioned by British Land Property Management Limited (thereafter referred to as British Land) to undertake a Biodiversity Net Gain Assessment (BNGA) of the Euston Tower site within the administrative boundary of the London Borough of Camden.

This report has been produced to support a planning submission for the site which seeks to re-develop the existing building to mixed retail, office and lab space.

This assessment aims to quantify the predicted change in ecological value of the site in light of the proposed development to assess compliance against local and national planning policy. The upcoming BNG mandate to be set out in the Environment Act 2021 states that a target of 10% net gain in biodiversity should be reached and biodiversity value should be maximised on site.

The baseline biodiversity value of the site is calculated to be 2.44 Habitat Units (HU). There were no hedgerows or river habitats on site and therefore, no corresponding hedgerow or watercourse biodiversity units. The baseline biodiversity value of the off-site changes is calculated to be 0.11 HU.

Based on the landscaping plans provided the development is predicted to provide a net gain of 0.66 HU (26.90%) associated with area-based habitats compared with the pre-development value.

Should these plans and the stated habitat condition criteria in Appendix B be adhered to, the proposals stand to be compliant with legislation and current planning policy. Any changes to the design will impact upon the biodiversity score and thus the metric will need to be updated to reflect such changes.

Detail relating to the proposed ecological enhancement actions in relation to habitat creation and management should be provided within an Ecological Management Plan (EMP) for the site which should be secured through planning condition.

2.0 INTRODUCTION

Greengage was commissioned by British Land Property Management Limited (thereafter referred to as British Land) to undertake a Biodiversity Net Gain Assessment (BNGA) of the Euston Tower site within the administrative boundary of the London Borough of Camden.

This report has been produced to support a planning submission for the site which seeks to re-develop an existing building, Euston Tower, and includes the provision of public realm enhancements, including new landscaping, new publicly accessible steps and ramp, short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works.

This assessment aims to quantify the predicted change in ecological value of the site in light of the proposed development to assess compliance against local and national planning policy. The upcoming BNG mandate (effective from January 2024) set out in the Environment Act 2021 states that a target of 10% net gain in biodiversity should be reached and biodiversity value should be maximised on site. Further, the London Plan 2021 writes within Policy G6 that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain, and the Camden Local Plan Policy A3 outlines a commitment for the council to assess developments against their ability to realise benefits for biodiversity within the layout and design, and to incorporate additional trees and vegetation wherever possible.

Any further changes to the design will impact upon the BNG score and the metric will need to be updated to reflect such changes. This also carries forward for a minimum of 30 years, as required by BNG, including after planning permission has been granted and throughout the construction phase.

2.1 SITE DESCRIPTION AND CONTEXT

The survey area extends to approximately 0.1 hectares and is centred on National Grid Reference (OS NGR) TQ 29181 82344, OS Co-ordinates 529181, 182344.

The existing office building, Euston Tower, is bound by Euston Road to the south, Regents Plaza to the west, Brock Street to the north and Hampstead Road to the east of the site.

The site's immediate surroundings are highly urbanised, dominated by offices, restaurants and retail dwellings, with limited greenspaces.

Pockets of green spaces include public parks and gardens, with the nearest being Park Square and Regents Park 400m east of the site.

Although street trees, public gardens and green roofs are acting as stepping-stones across the urban landscape, the landscape is fragmented and the site is isolated from substantial green spaces due to the surrounding infrastructure reducing green connectivity.

2.2 PROPOSED DEVELOPMENT

The proposed development plans seeks to re-develop Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing

building, to provide a 32-storey building for use as offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and learning and community space (Class F) at ground, first and second floors, and associated external terraces. The submission includes the provision of public realm enhancements, including new landscaping, and provision of new publicly accessible steps and ramp. It also includes provision of short and long stay cycle storage, servicing, refuse storage, plant and other ancillary and associated works.

Within the landscaping and planting plans provided by Deborah Saunt David Hills Architects (DSDHA) (doc ref: 231025_2D_ET_PROPOSED PUBLIC REALM AND LANDSCAPE_LEVEL 00-01), received October 2023, green areas on site include:

- Native and non-native shrub planting;
- Meadow grassland imitation planting;
- Heathland imitation planting;
- Woodland groundcover imitation planting;
- Native tree planting;
- Intensive green roof creation within terraces;
- Biodiverse green roof creation; and
- Wetland/pond creation.

3.0   METHODOLOGY

3.1   GOOD PRACTICE PRINCIPLES

To calculate the ecological value of the pre- and post-development site, the Natural England Biodiversity Metric 4.0 methodology (BM4.0) was utilised, following good practice guidance from Natural England[1] , and joint guidance from CIEEM, IEMA and CIRIA[2]. The Statutory Biodiversity Metric and updated guidance was released on the 29th of November 2023, however, this assessment was completed prior to its release. The good practice guidelines "provide a framework that helps improve the UK's biodiversity by contributing towards strategic priorities to conserve and enhance nature while progressing with sustainable development". This framework consists of 10 good practice principles which are outlined in Table 3.1.

Table 3.1   Good Practice Principles and Discussion

Good Practice Principle	Discussion
1. Apply the Mitigation Hierarchy	The baseline habitats are of limited ecological value, with individual trees providing the majority of the baseline units. Losses are mitigated for, and further ecological enhancements are provided within the site boundary.
2. Avoid Losing Biodiversity that Cannot be Offset by Gains Elsewhere	No irreplaceable habitats are present on-site pre-development.
3. Be Inclusive and Equitable	The project team have been responsive to ideas from Greengage to enhance biodiversity value on site for all users, including the public.
4. Address Risks	Greengage has worked with the project team to improve biodiversity value on site and mitigate risks.
5. Make a Measurable Net Gain Contribution	The development is likely to achieve a measurable gain in biodiversity through the use of BM4.0. The metric calculations are subject to change regarding on design change.
6. Achieve the Best Outcomes for Biodiversity	The landscape design improves biodiversity value on site. The proposed development will also act as a green steppingstone for ecological connectivity within an urban area. The proposed development is due to achieve a biodiversity net gain as discussed in Section 4.
7. Be Additional	The proposals stand to provide a biodiversity net gain of 26.90% for habitats, which represent biodiversity gain above the target 10%.
8. Create a Net Gain Legacy	The landscaping on site will be designed, where possible, to be climate resilient, including drought tolerant species. The habitats created on site will be managed to ensure they continue to provide ecological benefits in perpetuity.

Good Practice Principle	Discussion
9.Optimise Sustainability	The design has been created with both biodiversity and people in mind. The design will help provide space for biodiversity in an urban area in addition to mitigating urban heat island effects, improving air quality and contributing to people's wellbeing.
10. Be Transparent	Advice on enhancing the sites ecological value was provided during the design process.

3.2   BIODIVERSITY METRIC

This metric uses Biodiversity Units as a proxy for the ecological value of area of linear based habitats. The areas of each habitat parcel are measured, with each parcel assigned a 'Distinctiveness', 'Condition' and 'Strategic Significance' score. Distinctiveness is a default score for the habitat classification, representing its inherent ecological value, whereas condition refers to the state each parcel is in relative to predetermined set of criteria outlined in the supplementary BM4.0 guidance.

Strategic significance draws upon priorities and objectives within local plans and strategies, and is measured by providing habitats with a score from low to high as follows:

- High - "area/action formally identified within a local plan, strategy or policy";

- Medium - "location ecologically desirable but area/action not identified in local plan, strategy or policy"; and

- Low - " area/action not identified in any local plan, strategy or policy; or no local strategy in place"[1].

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

An assessment of the predicted change in ecological value is undertaken comparing the Biodiversity Units and assessing percentage change. Changes in broader habitat types (for example, 'Urban', 'Woodland' and 'Grassland' habitats) are also tracked. Based on the distinctiveness and habitat type the BM4.0 will also set minimum habitat creation and enhancement requirements to compensate for specific habitat losses (up to the point of no net loss). This is seen in the BM4.0 as Required Action to Meet Trading Rules. This can be used to understand and inform ecologists and developers, how the site should incorporate habitats into any future site layout or landscape design. Trading habitats is discouraged unless specifically targeted within a local strategy, and trading down distinctiveness is not permitted.

3.3   BASELINE CALCULATION

To calculate pre-development Biodiversity Units, data collected during a Preliminary Ecological Appraisal (PEA) undertaken by Greengage on the 12th of January 2023 was assessed (doc ref: 552111gaJan23FV03_PEA). Areas of each habitat type were taken from the baseline habitat map within QGIS (habitat map provided in Appendix A).

Distinctiveness values were automatically calculated for the site and habitat conditions were assessed using DEFRA's condition assessment criteria in the field.

Strategic significance was assessed by reviewing the following:

- Camden Local Plan[3];

- Camden Biodiversity Action Plan[4]; and

- DEFRA's Magic map application[5].

The site is not part of any biodiversity strategies, therefore the site itself is considered to have low strategic significance. However, where habitats associated with this assessment area are specifically referenced in a local biodiversity strategy, they were assigned high strategic significance.

3.4   PROPOSED DEVELOPMENT CALCULATIONS

Landscaping habitat types were provided by DSDHA (doc ref: 364_20.004 Proposed Landscape Ground Floor Planting) and then translated into the relevant UKHAB and Metric 4.0 habitats by Greengage based on species composition, abiotic factors and professional judgement.

Targeted condition scores were assigned by Greengage, using the Metric 4.0 habitat condition criteria and species provided by DSDHA, whilst considering the likely future use of each area.

3.5   COMPETENCIES

Saul Ridley, who undertook the assessment and prepared this report, has a Bachelor's degree in Zoology (BSc Hons) and a Research Master's degree in Conservation Biology (MRes). Saul is an ecological consultant for Greengage with 2 years' experience in BNG assessments.

Georgia Alfreds, who reviewed this report, has a Bachelor's degree in Geography (BSc Hons), a Master's degree in Environmental Biology: Conservation and Resource Management (MSc) and is an Associate member of CIEEM with 7 years' experience in ecological survey and assessment.

James Bumphrey, who verified this report, has a Bachelor's degree in Environmental Science (BSc Hons) and a Master's degree in Environmental Consultancy (MSc). James is a Director at Greengage, with more than 10 years' experience in ecological survey and assessment.

This report was written by Saul Ridley and reviewed and verified by Georgia Alfreds and James Bumphrey 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.

3.6   CONSTRAINTS

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.

Delivery of biodiversity net gain does not remove requirements for avoidance, protection and mitigation relating to protected habitats and species. 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.

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

4.0 RESULTS

4.1 BASELINE CONDITIONS

The baseline biodiversity value of the site is calculated to be 2.44 Habitat Units (HU) in accordance with BM4.0. There were no hedgerows or river habitats on site and therefore, no corresponding Hedgerow Units or Watercourse Units. Urban trees are listed as a priority within the Camden Biodiversity Action Plan and Local Plan, as such they are given 'High' strategic significance. All other baseline habitats are classified as 'Low' strategic significance.

A breakdown of the baseline habitats and their corresponding biodiversity units is provided below in Table 4.1.

Table 4.1 Baseline Habitat Biodiversity Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Strategic Significance	Biodiversity Units
Grassland	Modified grassland	0.0183	Low	Poor	Low	0.04
Urban	Introduced shrub	0.0053	Low	N/A	Low	0.01
Urban	Ground level planters	0.0360	Low	N/A	Low	0.07
Urban	Developed land; sealed surface	0.7255	V.Low	N/A	Low	0.00
Individual trees	Urban tree	0.2199*	Medium	Poor	High	1.01
Individual trees	Urban tree	0.1425*	Medium	Moderate	High	1.31
*Area of individual trees assigned according to guidance from the BM4.0, and not counted the towards the total site area.					TOTAL	2.44

Condition Assessment

In accordance with BM4.0 guidance, habitat types **'Developed land; sealed surface'**, **'Ground level planters'** and **'Introduced shrub'** are not subject to a condition assessment.

'Modified grassland' habitat on site has been assigned 'Poor' condition. The grassland lacks species diversity and is managed to a short even sward height. Scrub and invasive species are absent.

'Urban trees' on site have been assigned 'Poor' or 'Moderate' condition. The trees have little evidence of adverse impacts from human activity, but few are mature, many are non-native species, and some do not oversail vegetation. Features for wildlife such as dead wood and cavities are absent.

4.2   OFF-SITE BASELINE CONDITIONS

Five off-site urban trees are scheduled for removal. The biodiversity value of these trees is calculated to be 0.11 HU in accordance with BM4.0. No other off-site habitats, hedgerows or rivers will be affected, therefore there are no other off-site Habitat Units, Hedgerow Units or Watercourse Units within the calculation. Urban trees are listed as a priority within the Camden Biodiversity Action Plan and Local Plan, as such they are given 'High' strategic significance.

A breakdown of the baseline off-site habitats and their corresponding biodiversity units is provided below in Table 4.2.

Table 4.2   Baseline Off-Site Habitat Biodiversity Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Strategic Significance	Biodiversity Units
Individual trees	Urban tree	0.0163	Medium	Poor	High	0.07
Individual trees	Urban tree	0.0041	Medium	Moderate	High	0.04
					TOTAL	0.11

Off-Site Condition Assessment

Four of the off-site **'Urban trees'** have been assigned 'Poor' condition due to being immature non-native trees oversailing hardstanding without substantial features such as crevices for wildlife. One of the off-site 'Urban trees' has been assigned 'Moderate' condition due to being a native species, however, it is also oversailing hardstanding without substantial features for wildlife.

4.3   PROPOSED SITE LAYOUT

Based on masterplan drawings, the proposed development is predicted to provide 3.14 HU on site in accordance with BM4.0. There are no proposed hedgerows or river habitats within the development and therefore, no corresponding Hedgerow Units or Watercourse Units. Biodiverse green roofs and urban trees are listed as priorities within the Camden Biodiversity Action Plan and Local Plan, as such they are given 'High' strategic significance. All other proposed habitats are classified as 'Low' strategic significance.

A breakdown of the proposed habitats and their corresponding biodiversity units is provided below in Table 4.3.

Table 4.3   Post-Development Habitat Biodiversity Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Strategic Significance	Biodiversity Units
Urban	Developed land; sealed surface	0.5388	V.Low	N/A	Low	0.00
Urban	Introduced shrub	0.1208	Low	N/A	Low	0.22
Lakes	Pond (non-priority habitat)	0.0240	Medium	Moderate	Low	0.17
Urban	Biodiverse green roof	0.0348	Medium	Good	High	0.23
Urban	Intensive green roof	0.0667	Low	Good	Low	0.33
Individual trees	Urban tree	0.1099*	Medium	Good	High	0.49
Individual trees	Urban tree	0.4763*	Medium	Moderate	High	1.67
*Area of individual trees assigned according to guidance from the BM4.0, and not counted the towards the total site area. **Rounding present.					TOTAL	3.14**

Condition Assessment

In accordance with Metric 4.0 guidance, habitat types **'Developed land; sealed surface'** and **'Introduced shrub'** are not subject to a condition assessment. The 'Developed land; sealed surface' comprises the hardstanding and buildings on site. The areas of 'Introduced shrub' comprise three distinct planting characters designed to imitate natural habitats of grassland, woodland, and heathland with a mix of robust species fitting of urban environments. The planting mixes are majority non-native but include native species and species on the RHS Plants for Pollinators list.

A **'Pond (non-priority habitat)'** will be created and planted with wetland plants. The pond is predicted to reach 'Moderate' condition.

'Urban trees' will be planted throughout the site. These will total 120 native trees, with 3 being predicted to reach maturity within 30 years and 'Good' condition, and 117 being planted at a smaller size and predicted to reach 'Moderate' condition. All of the trees will oversail vegetation. In addition, one of the existing trees, a small tree currently in 'Poor' condition, will be retained (equivalent to 0.0041 ha / 0.02 HU in BM4.0).

'Biodiverse green roof' will be created on the roof of Euston Tower. It will be planted with a variety of native species and species listed on the RHS Plants for Pollinators list, at a density of 30 plants per m^2. Invertebrate features will be installed including logs, stone piles, and liners for temporary water bodies. The biodiverse green roof is predicted to reach 'Good' condition.

'Intensive green roof' will be created on level 02, 03, 04, 07, 11, 19, 25 and 30. It will be planted with a large variety of native and non-native heathland/upland species at a density of 11 plants per m^2. The intensive green roof is predicted to reach 'Good' condition.

Full condition assessments for the proposed habitats are presented in Appendix B.

4.4   PROPOSED OFF-SITE LAYOUT

The five off-site urban trees scheduled for removal will all be replaced with trees of similar age and condition. The biodiversity value of the proposed trees is calculated to be 0.07 HU in accordance with BM4.0, the proposed development is therefore predicted to provide -0.05 off-site HU (rounding present). No other off-site habitats, hedgerows or rivers will be created, therefore there are no other off-site Habitat Units, Hedgerow Units or Watercourse Units within the calculation. Urban trees are listed as a priority within the Camden Biodiversity Action Plan and Local Plan, as such they are given 'High' strategic significance.

A breakdown of the baseline off-site habitats and their corresponding biodiversity units is provided below in Table 4.4.

Table 4.4   Baseline Off-Site Habitat Biodiversity Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Strategic Significance	Biodiversity Units
Individual trees	Urban tree	0.0163	Medium	Poor	High	0.05
Individual trees	Urban tree	0.0041	Medium	Moderate	High	0.01
*Rounding present					TOTAL	0.7*

Off-Site Condition Assessment

The five proposed **'Urban trees'** will be of similar age and condition to the five scheduled for removal. Therefore, four are predicted to reach 'Poor' condition due to being immature non-native trees oversailing hardstanding without substantial features for wildlife and one is predicted to reach 'Moderate' condition due to being a native species oversailing hardstanding without substantial features for wildlife.

5.0   EVALUATION AND DISCUSSION

Under these proposals the development stands to provide 3.14 HU on-site and 0.07 HU off-site, resulting in a net gain of 0.66 HU (26.90%) over the combined on-site and off-site baseline of 2.55 HU.

Habitat trading rules are not satisfied due to the net loss of 0.19 units of 'Individual trees', however, the trees to be lost are largely non-native and in 'Poor' condition, oversailing hardstanding, and showing evidence of adverse impacts from humans such as artificial lighting being wrapped around their trunks. Further, during the PEA undertaken by Greengage (doc ref: 552111gaJan23FV03_PEA) no evidence was found of nesting birds or previous use of the trees for these means, and the site was assessed to have low potential to support nesting birds and negligible potential to support notable invertebrates. Therefore, the provision of new native trees within the planting areas and the net gain of 0.22 units of 'Introduced shrub', comprising a wide variety of species and a diverse vegetation structure, will mitigate for the loss of the ecological function of the trees and enhance the site for biodiversity by providing better nesting and foraging opportunities for birds and invertebrates.

The proposals are therefore in compliance with local and national planning policy (see Appendix C).

As discussed in the PEA report, further qualitative ecological enhancement will be targeted on site through the provision of invertebrate habitat features (log piles and bee posts), bird boxes and bat boxes, to help protect nationally and locally important species.

Details on habitat enhancement and management to ensure delivery of BNG should be presented in an EMP and detailed landscaping plans, which should be secured through planning condition. The EMP should provide description of how habitats are to be created and managed for a period of at least 30 years.

6.0 SUMMARY & CONCLUSION

Greengage was commissioned by British Land to undertake a BNGA of the Euston Tower site in order to assess the change in ecological value of the site in light of the proposed development.

This report demonstrates that the development proposals will result in a net gain of 0.66 habitat units (26.90%) should existing plans be adhered to. This is in compliance with local planning policy and upcoming legislation regarding mandatory biodiversity net gain.

Any further changes to the design will impact upon the biodiversity score and thus the metric will need to be updated to reflect such changes. This also carries forward throughout the entire lifetime of the project, including after planning consent, and in and throughout the construction phase. Habitat condition criteria in Appendix B must also be adhered to.

Details on any habitat creation and its ongoing management should be agreed with the Local Planning Authority and described in an EMP (secured by planning condition) for the site. The EMP must provide description of how habitats are to be created, managed and maintained for a period of at least 30 years.

APPENDIX A HABITAT MAP AND PROPOSED LANDSCAPING

Figure A.1   Site plan and habitat map

Figure A.2   Proposed ground level habitat map

APPENDIX B CONDITION ASSESSMENT CRITERIA FOR PROPOSED HABITATS

Pond (non-priority habitat)

	Condition Assessment Criteria	Condition Achieved (Y/N)	Notes/Justification
A	The pond is of good water quality, with clear water (low turbidity) indicating no obvious signs of pollution. Turbidity is acceptable if the pond is grazed by livestock.	Y	The pond will be managed to retain good water quality.
B	There is semi-natural habitat (moderate distinctiveness or above) completely surrounding the pond, for at least 10 m from the pond edge for its entire perimeter.	N	There will not be a 10m edge of semi-natural habitat.
C	Less than 10% of the water surface is covered with duckweed Lemna spp. or filamentous algae.	Y	Duckweed will not dominate the water surface.
D	The pond is not artificially connected to other waterbodies, e.g. agricultural ditches or artificial pipework.	N	Artificial pipework will likely be present.
E	Pond water levels can fluctuate naturally throughout the year. No obvious artificial dams, pumps or pipework.	N	Artificial pipework will likely be present.
F	There is an absence of listed non-native plant and animal species.	Y	No listed non-native species will be introduced.
G	The pond is not artificially stocked with fish. If the pond naturally contains fish, it is a native fish assemblage at low densities.	Y	The pond will not be stocked with fish.
Additional Criteria - must be assessed for all non-woodland ponds:			
H	Emergent, submerged or floating plants (excluding duckweed) cover at least 50% of the pond area which is less than 3 m deep.	Y	Aquatic vegetation will cover at least 50% of the pond.
I	The pond surface is no more than 50% shaded by adjacent trees and scrub.	Y	The pond will not be more than 50% shaded.

Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓
Passes 9 criteria	Good (3)	
Passes 6 to 8 criteria	Moderate (2)	✓
Passes 5 or fewer criteria	Poor (1)	

Individual Trees

	Condition Assessment Criteria	Condition Achieved (Y/N)	Notes/Justification
A	The tree is a native species (or more than 70% within the block are native species).	Y	All trees being planted are native species.
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y	Individual trees automatically pass this criterion.
C	The tree is mature or veteran (or more than 50% within the block are mature or veteran).	Y (3) N (117)	Three of the trees will be planted at a semi-mature age and are likely to reach maturity within 30 years. All other trees will be planted at a younger age and so do not pass this criterion.
D	There is little or no evidence of an adverse impact on tree health by anthropogenic activities such as vandalism or herbicide use. There is no current regular pruning regime so the trees retain >75% of expected canopy for their age range and height.	Y	All trees will be managed to avoid adverse impacts.
E	Micro-habitats for birds, mammals and insects are present e.g. presence of deadwood, cavities, ivy or loose bark	N	It is unlikely substantial micro-habitats will form on the trees.
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	All trees will be planted within planting areas and as such will oversail vegetation, including shrubs, grasses and flowers.

Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓
Passes 5 or 6 criteria	Good (3)	✓ 3 trees
Passes 3 or 4 criteria	Moderate (2)	✓ 117 trees
Passes 2 or fewer criteria	Poor (1)	

Biodiverse Green Roof

	Condition Assessment Criteria	Condition Achieved (Y/N)	Notes/Justification
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	Y	The biodiverse green roof will incorporate plant species that vary in their structure and thus provide different opportunities for wildlife.
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Y	The biodiverse green roof will be planted with a variety of species beneficial for wildlife.
C	Invasive non-native plant species (listed on Schedule 9 of WCA) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area. Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	Y	The biodiverse green roof will be planted with native species and/or species listed on the RHS Plants for Pollinators list.
Additional Criterion - must be assessed for Biodiverse green roofs only:			
G	The roof has a varied depth of 80 – 150 mm; at least 50% is at 150 mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. Note – to achieve Good condition some additional habitat, such as sand piles, stones, logs etc are present.	Y	The biodiverse green roof will be based on a Bauder biodiverse roof system with a varied depth and invertebrate habitat features including logs, stone piles, and temporary water bodies.

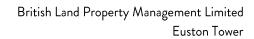| Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes additional criterion relevant to specific habitat type (F or G).	Good (3)	✓
• Passes 2 or 3 of 4 criteria; OR • Passes 4 of 4 criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)	
• Passes 0 or 1 of 4 criteria.	Poor (1)	

Intensive Green Roof

Condition Assessment Criteria		Condition Achieved (Y/N)	Notes/Justification
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	Y	The intensive green roof will have a varied structure with subshrubs, shrubs, grasses and perennials.
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Y	The intensive green roof will be planted with approximately 27 heathland/upland species, including species on the RHS Plants for Pollinators list.
C	Invasive non-native plant species (listed on Schedule 9 of WCA) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area.	Y	The intensive green roof will not be planted with species listed on Schedule 9 of the WCA, or species that are detrimental to native wildlife.

Condition Assessment Criteria		Condition Achieved (Y/N)	Notes/Justification
	Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).		
Additional Criterion - must be assessed for Intensive green roofs only:			
F	The roof has a minimum of 50% native and non-native wildflowers. 70% of the roof area is soil and vegetation (including water features).	Y	The intensive green roof areas will be dense with planting covering over 70% of the designated areas. The planting will consist of at least 50% wildflowers (both native and non-native).

Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes additional criterion relevant to specific habitat type (F or G).	Good (3)	✓
• Passes 2 or 3 of 4 criteria; OR • Passes 4 of 4 criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)	
• Passes 0 or 1 of 4 criteria.	Poor (1)	

APPENDIX C LEGISLATION AND POLICY

C.1   LEGISLATION

The Environment Act, 2021[6]

Following secondary legislation, the Environment Act 2021 will mandate the requirement for new development in England to deliver a minimum 10% biodiversity net gain (BNG), as measured by the agreed metric (the current relevant version being the Natural England Metric 4.0), secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of offsite biodiversity unit offsets, or the purchase of biodiversity credits.

The Act introduces the condition that no development may begin unless a biodiversity net gain plan has been submitted and approved by the local planning authority (LPA).

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

C.2   POLICY

National

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) 2023[7] 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.

Local

The London Plan 2021

Policy G6 Biodiversity and access to nature

A. Sites of Importance for Nature Conservation (SINCs) should be protected.

B. Boroughs, in developing Development Plans, should:

1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks

2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them

3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans

4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context

5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

C. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

1) avoid damaging the significant ecological features of the site

2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site

3) deliver off-site compensation of better biodiversity value.

D. 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.

E. Proposals which reduce deficiencies in access to nature should be considered positively.

Camden Local Plan 2017

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;

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.

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] Natural England Joint Publication (2023). The Biodiversity Metric 4.0 – User Guide.

[2] Julia Baker, Rachel Hoskin & Tom Butterworth (2019). Biodiversity Net Gain. Good practice principles for development: A practical guide. CIRIA, London

[3] London Borough of Camden (2017). Camden Local Plan

[4] London Borough of Camden (2013). Camden Biodiversity Action Plan

[5] DEFRA (2023). Magic Map. Available at: https://magic.defra.gov.uk/magicmap.aspx

[6] GOV.UK. (2021). Environment Act 2021. Available at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted

[7] GOV.UK. (2023). National Planning Policy Framework. [online] Available at: https://www.gov.uk/guidance/national-planning-policy-framework