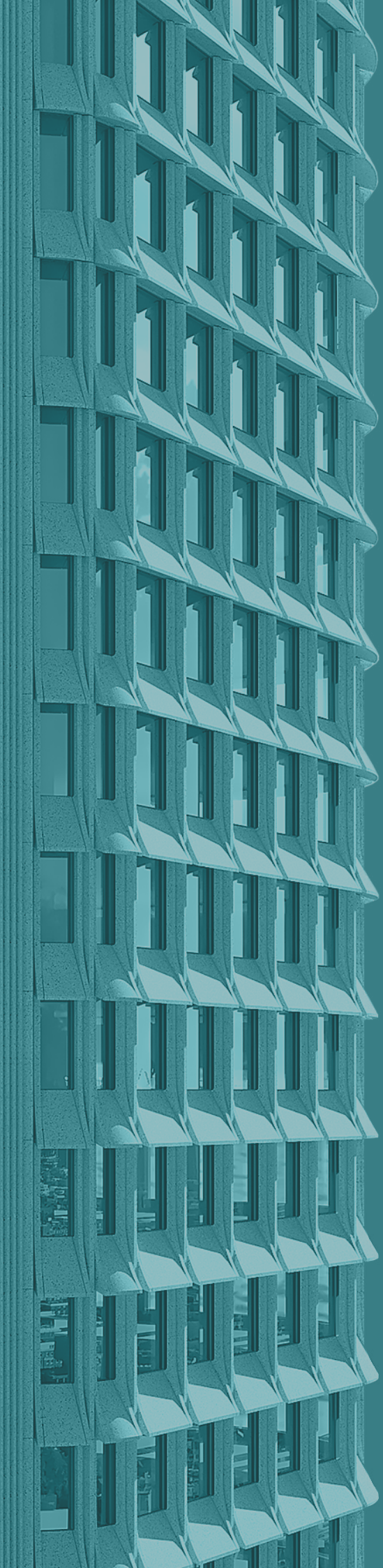

EUSTON TOWER

Biodiversity Survey & Report

December 2024

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
Date:	November 2024	November 2024
Comments:		
Prepared by:	Sophie Trigg	Sophie Trigg
Authorised by:	Saul Ridley	Georgia Alfreds
File Reference:	552111st28Oct24FV06_BNGA .docx	552111st28Oct24FV06_BNGA .docx

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Figures

1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd (Greengage) was commissioned by British Land Property Management Limited (hereafter referred to as the Applicant) to undertake an updated Biodiversity Net Gain Assessment (BNGA) of the Euston Tower site, within the administrative boundary of the London Borough of Camden, hereafter referred to as 'the site'.

This report has been produced as an update and therefore supersedes the previous assessment, which supported the planning application for the site (application reference 23/5240/P). This update takes into account changes to the landscape design which were implemented after the planning submission. The 'Proposed Development' seeks to re-develop the existing building to mixed retail, office and laboratory space.

The BNGA aims to quantify the predicted change in biodiversity value of the site in light of the Proposed Development to assess compliance against national and local planning policy. The planning application for the site was submitted prior to the implementation of mandatory BNG (12th of February 2024), as outlined through the Environment Act 2021, however the London Plan 2021 outlines an expectation for developments to secure net biodiversity gain. Therefore, the Proposed Development looked to achieve the BNG mandate that a target of 10% net gain in biodiversity should be reached and biodiversity value should be maximised on site, despite the fact that it was not required to under the Environment Act 2021.

The site extends to 0.79 hectares (ha) and comprised modified grassland, introduced shrub, ground level planters, developed land; sealed surface and individual trees, as identified from a site walkover undertaken on 12th of January 2023.

Proposed habitat creation includes 0.1167ha of introduced shrub, 0.0662ha of intensive green roof, 0.0324ha of biodiverse green roof, 0.0222ha of ponds (non-priority habitat) and 115 individual trees.

The locations, extents, conditions and habitat parcel reference numbers of the pre-development (baseline) and post development habitats are mapped in Figure A.1 and Figure B.1. The habitat values are split into three categories: area-based 'Habitat Units' (HU), linear-based 'Hedgerow Units' (HeU) and aquatic linear-based 'Watercourse Units' (WU) respectively, where applicable to the site. For this site, only HU were applicable.

The Proposed Development will result in the removal and re-instatement of five trees outside of the red line boundary. These have been captured as 'off-site' habitats within the metric and are included within the BNG calculation.

The pre-development baseline value of the site is 2.44HU.

The pre-development baseline value for the off-site habitats is 0.11HU.

The post-development design proposals are predicted to deliver 3.35HU on-site and 0.07HU off-site. This is an overall unit increase of 0.86HU (equivalent to +35.39% for HU).

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

This BNGA update summarises the revisions made to the pending strategic application for Full Planning Permission (ref. 23/5240/P), submitted in December 2023 for the Proposed Development at Euston Tower (286 Euston Road, London).

The Applicant has undertaken extensive consultation during both the pre-application and determination stages of the Proposed Development and has sought to respond positively to the responses received. The scheme has been revised in response to feedback from Officers, local stakeholders and residents, the Regents Park Conservation Area Advisory Committee and statutory consultees, including Historic England and The Greater London Authority.

This updated report has been prepared detailing the revisions to the pending scheme (the "Proposed Development"). For the avoidance of doubt, the BNGA which accompanied the December 2023 Submission is considered superseded by this BNGA which considers the 2024 Revisions and any updates to assessments as a result of these revisions. This report also provides further details responding to consultation responses received since the original submission in December 2023.

The Proposed Development seeks the redevelopment of Euston Tower comprising retention of parts of the existing building and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building. The development will include new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work

The BNGA aims to quantify the predicted change in biodiversity value of the site in light of the Proposed Development to assess compliance against national and local planning policy. The planning application for the site was submitted prior to the implementation of mandatory BNG (12th of February 2024), as outlined through the Environment Act 2021. However, the Proposed Development looked to achieve the BNG mandate 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

The site extends to approximately 0.79 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 seeks the redevelopment of Euston Tower, comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and Enterprise space (Class E/ F) at ground and first, and associated external terraces; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work..

Within the landscaping and planting plans provided by Deborah Saunt David Hills Architects (DSDHA) (doc refs: 2D_ET_Proposed Public Realm and Landscape Level 00-001_364_SK003, 2D_ET_Proposed Public Realm and Landscape Publicly Accessible Space Level 02_364_SK0034 and Planting Proposals for Planning), received November 2024, 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 (BM4.0) and corresponding methodology was utilised, following good practice guidance from Natural England[1], and joint guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM), the Institute of Environmental Management and Assessment (IEMA) and the Construction Industry Research and Information Association (CIRIA)[2]. The Statutory Biodiversity Metric and updated guidance was released on the 29th of November 2023, however, the previous assessment was completed prior to its release using BM4.0. Therefore, in order to be consistent with the previous assessment, this BNGA update was undertaken using BM4.0.

The BNG 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.
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 depending 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.

Good Practice Principle	Discussion
7. Be Additional	The proposals stand to provide an overall biodiversity net gain of 35.39% for on-site and off-site 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.
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 (BU) 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', '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].

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.

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 BU and assessing the 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.

For individual trees present on the site, the area extent attributed to individual trees has been calculated using the 'Tree helper' within the SBM calculation tool. This is based upon using Diameter at Breast Height (DBH) in centimetres (cm). The DBH measurements for individual trees within the site have been taken from the PEA survey. In accordance with the BM4.0 User Guide, based on 'Diameter at breast height (centimetres (cm)), tree sizes have been recorded as follows;

- Small is less than 30cm diameter,
- Medium is greater than 30cm, to less than or equal to, 60cm;
- Large is greater than 60cm, to less than or equal to 90cm; and,
- Very large is greater than 90cm.

3.3 BASELINE CALCULATION

A Preliminary Ecological Appraisal (PEA) (Report Ref: 552111gaJan23FV03_PEA) has been undertaken by Greengage in accordance with guidance in the UK Habitat Classification System (UKHab)[6] and the CIEEM (2017) Guidelines for Preliminary Ecological Appraisal[7], in accordance with British Standard (BS) 42020: 2013: Biodiversity[8]. The PEA included a site walkover on the 12th of January 2023 which identified and mapped the extent and distribution of different habitat types on site according to the standard UKHab classification methodology, i.e. using Primary Codes, and supplemented with Secondary Codes. A habitat map was produced to illustrate the results, which is provided as Appendix A.

During the PEA, the habitats were also subject to Condition Assessments, where relevant, in accordance with the BM4.0 Condition Assessment guidance.

3.4 PROPOSED DEVELOPMENT CALCULATIONS

To calculate the post-development BU value, the area extents for each habitat type were measured based on the 'Proposed Public Realm and Landscape Plans', using Quantum Geographical Information System (QGIS) software. See Appendix B.

Habitat types provided by DSDHA (doc refs: 2D_ET_Proposed Public Realm and Landscape Level 00-001_364_SK003, 2D_ET_Proposed Public Realm and Landscape Publicly Accessible Space Level 02_364_SK0034 and Planting Proposals for Planning) and then translated into the relevant UKHAB and BM4.0 habitats by Greengage based on species composition, abiotic factors and professional judgement.

Targeted condition scores were assigned by Greengage, using the BM4.0 habitat condition criteria, whilst considering the likely future use of each area on the 'Proposed Public Realm and Landscape Plans' and what was considered feasible to reach.

3.1 COMPETENCIES

Sophie Trigg, who undertook the assessment and prepared this report, has a Bachelor's degree in Zoology (BSc Hons) and has over six years' experience in ecological consultancy. Sophie has experience in a range of ecological surveys and assessments, with a particular focus on BNG.

Saul Ridley, who reviewed 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 ecosystem service and BNG assessments.

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

This report was written by Sophie Trigg, reviewed by Saul Ridley and verified by Georgia Alfreds 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.

3.2 ASSUMPTIONS AND LIMITATIONS

General

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.

Metric Calculation Tool

The condition of the habitats, either for the baseline or that a habitat is considered to be able reach post-development, has been assessed using information within the BM4.0 User Guide and based upon the ecologist's judgement of the habitats/input from the landscape architect.

Note the sum of the values shown in columns within the Biodiversity Units tables may differ from the total units stated. This is due to rounding and is not considered significant. The totals stated reflect those calculated within the BM4.0, based on the BM4.0 User Guide.

4.0 RESULTS

4.1 ON-SITE PRE-DEVELOPMENT (BASELINE)

The baseline biodiversity value of habitats within the site were 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 were given 'High' strategic significance. All other baseline habitats were classified as 'Low' strategic significance.

A breakdown of the baseline calculations for HU is provided in Table 4-1 below:

Table 4-1 On-site Baseline Habitat Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Grassland	Modified grassland	0.0184	Low	Poor	0.04
Urban	Developed land; sealed surface	0.7345	Very low	N/A - Other	0.00
Urban	Ground level planters	0.0362	Low	Condition Assessment N/A	0.07
Urban	Introduced shrub	0.0051	Low	Condition Assessment N/A	0.01
Individual trees	Urban tree	0.1425*	Medium	Moderate	1.31
Individual trees	Urban tree	0.2199*	Medium	Poor	1.01
***Individual trees are not included in the total site area to avoid double counting**				TOTAL	2.44

The above table has been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- 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 were 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 over sail vegetation. Features for wildlife such as dead wood and cavities are absent.

4.2 OFF-SITE PRE-DEVELOPMENT (BASELINE)

Five off-site urban trees are scheduled for removal. The biodiversity value of these trees is calculated to be 0.11HU 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 Off-site Baseline Habitat Units

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

The above table has been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- 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 ON-SITE POST-DEVELOPMENT (PROPOSED)

Based on Proposed Public Realm and Landscape Plans, the Proposed Development is predicted to provide 3.32HU 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 - On-site Post-Development Habitat Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Retained					
Individual trees	Urban tree	0.0366*	Medium	Moderate	0.34
Created					
Lakes	Ponds (non-priority habitat)	0.0222	Medium	Moderate	0.16
Urban	Developed land; sealed surface	0.5566	Very low	N/A - Other	0.00
Urban	Introduced shrub	0.1167	Low	Condition Assessment N/A	0.23
Urban	Intensive green roof	0.0662	Low	Good	0.33
Urban	Biodiverse green roof	0.0324	Medium	Good	0.21
Individual trees	Urban tree	0.1099*	Medium	Good	0.49
Individual trees	Urban tree	0.4560	Medium	Moderate	1.60
***Urban trees and green walls are not included in the total site area to avoid double counting**				TOTAL	3.35

The above table has been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- In accordance with BM4.0 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 four distinct planting characters designed to imitate natural habitats of grassland, woodland, riparian planting, 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 managed as a biodiverse space, designed to imitate different wetland habitats such as bog, meadow and marginal vegetation. The proposed pond will include deeper water for plants such as water lillies *Nymphaeaceae sp.*and shelving banks where plants such as iris *Iris sp.* and watermint *Mentha aquatica* will be planted. Some taller grasses will also be provided as marginal planting. for insects. The pond is predicted to reach 'Moderate' condition.
- 'Urban trees' will be planted throughout the site. These will total 115 native trees, with 3 being predicted to reach maturity within 30 years and 'Good' condition, and 112 being planted at a smaller size and predicted to reach 'Moderate' condition. All of the trees will over sail vegetation.
- One medium sized Urban tree in Moderate condition will be retained within the Proposed Development.
- '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 m2. The biodiverse green roof will be located underneath photovoltaic (PV) panels and is predicted to reach 'Good' condition.
- 'Intensive green roof' will be created on levels 01, 02, 03, 06, 11, 20, 23 and 26. It will be planted with a large variety of native and non-native heathland/upland species. The intensive green roof is predicted to reach 'Good' condition.
- Full condition assessments for the proposed habitats are presented in Appendix B.
- The metric calculation reflects area-based habitats only as no linear, or river habitats are proposed within the post-development design. The metric calculation also assumes that no habitats on site are being retained.

4.4 OFF-SITE POST-DEVELOPMENT (PROPOSED)

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 0.07HU in accordance with BM4.0, the Proposed Development is therefore predicted to provide -0.05 off-site HU. 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 - Off-site Post-Development Habitat Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Created					
Individual trees	Urban tree	0.0163	Medium	Poor	0.05
Individual trees	Urban tree	0.0041	Medium	Moderate	0.01
				TOTAL	0.07

The above table has been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- 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 3.35HU on-site and 0.07HU off-site, resulting in a net gain of 0.86HU (+35.39%) over the combined on-site and off-site baseline of 2.55HU. Habitat trading rules are also met for the Proposed Development.

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.

As per the Camden Local Plan (Appendix D), once a development has been completed, management and monitoring of habitats may be required to ensure areas with nature conservation value are retained and reach their full potential. To ensure long-term viability, detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and management could 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 legislation and current planning policy.

6.0 SUMMARY AND CONCLUSIONS

Greengage was commissioned by the Applicant 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.

The planning application for the site was submitted prior to the implementation of mandatory BNG (12th of February 2024), as outlined through the Environment Act 2021, however the London Plan 2021 outlines an expectation for developments to secure net biodiversity gain. Therefore, the Proposed Development looked to achieve the BNG mandate that a target of 10% net gain in biodiversity should be reached and biodiversity value should be maximised on site, despite the fact that it was not required to under the Environment Act 2021.

This report demonstrates that the development proposals will result in a net gain of 0.86HU (+35.39%) should existing plans be adhered to.

This is in compliance with local planning policy and legislation regarding mandatory biodiversity net gain at the time that the planning application was submitted.

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.

As per the Camden Local Plan (Appendix D), once a development has been completed, management and monitoring of habitats may be required to ensure areas with nature conservation value are retained and reach their full potential. To ensure long-term viability, detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and management could 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 legislation and current planning policy.

APPENDIX A PRE-DEVELOPMENT (BASELINE) HABITAT MAP

Figure A.1 Pre-development (Baseline) Habitat Map

EUSTON TOWER

Legend

- Red Line Boundary
- Developed land; sealed surface
- Ground level planters
- Introduced shrub
- Modified grassland
- Existing Medium Urban Tree
- Existing Small Urban Tree

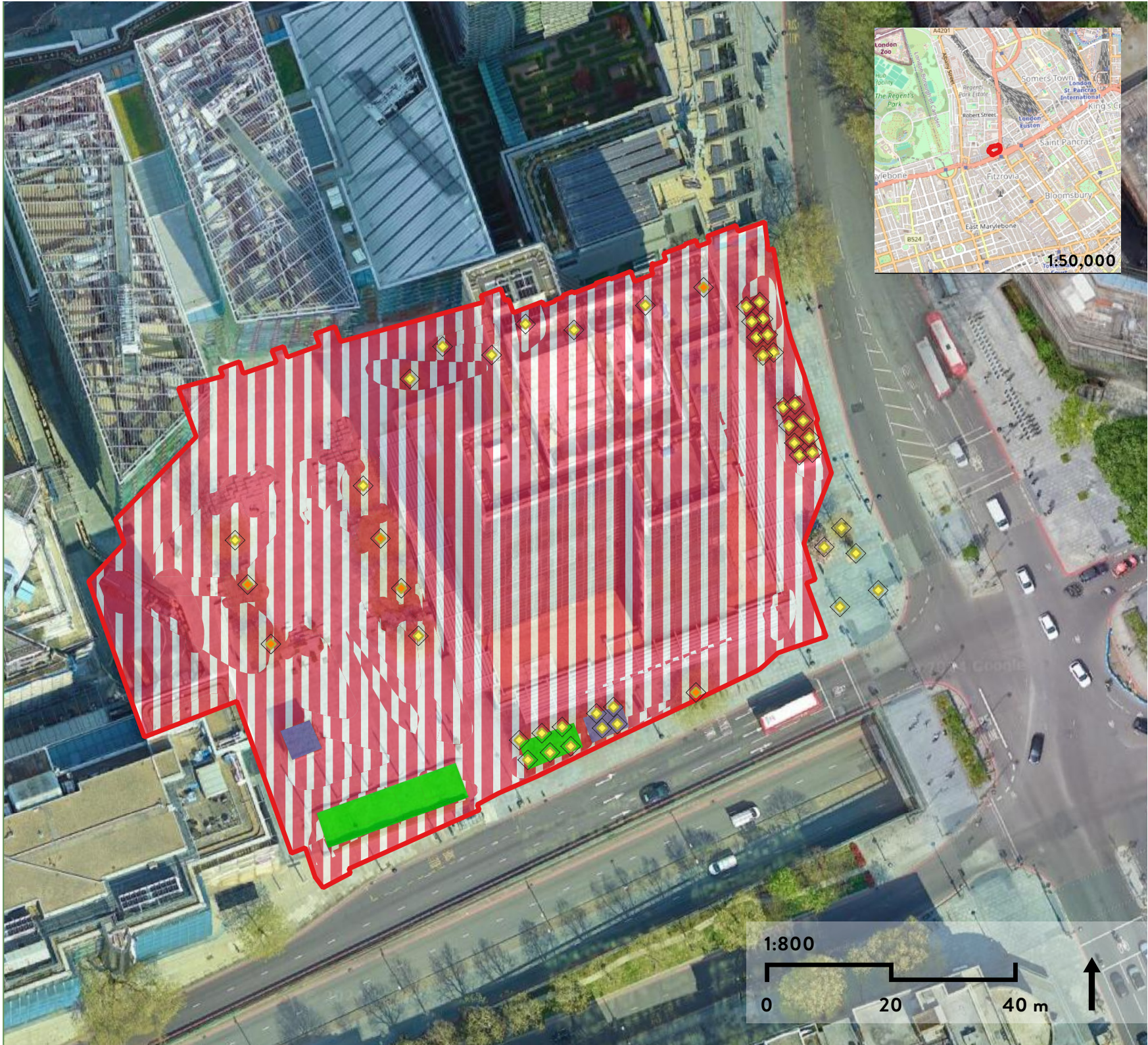
Title: Figure A.1 Baseline Habitat Map

Drawn by: ST
Date: 28/11/2024

Reviewed by: SR
Date: 28/11/2024

Project number: 552111
Sources: ESRI World Topo, Greenspace Information for Greater London (GiGL), Natural England

Greengage



APPENDIX B POST-DEVELOPMENT HABITAT MAP

Figure B.1 Post-development Ground Level Habitat Map

EUSTON TOWER

Legend

- Red Line Boundary
- Developed land; sealed surface
- Introduced shrub
- Ponds (non-priority habitat)
- Proposed Small Urban Tree
- Retained Medium Urban Tree

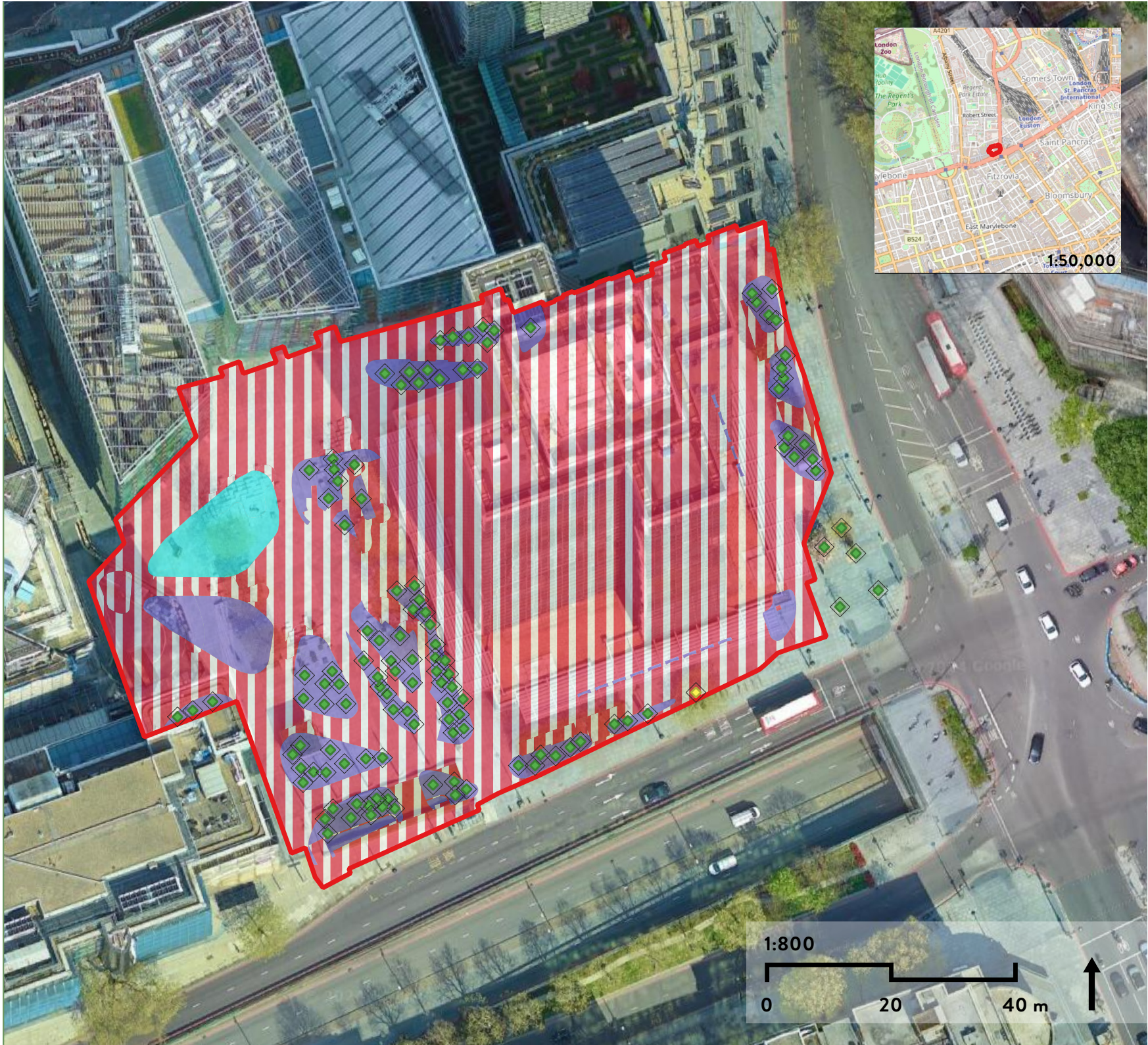
Title: Figure A.1 Baseline Habitat Map

Drawn by: ST
Date: 28/11/2024

Reviewed by: SR
Date: 28/11/2024

Project number: 552111
Sources: ESRI World Topo, Greenspace Information for Greater London (GiGL), Natural England

Greengage



APPENDIX C 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 (110)	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 over sail 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)	✓ 110 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 features will be provided.

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)	

Urban - Developed Land; Sealed Surface

No assessment is required for this habitat as the condition is fixed within the SBM as N/A.

Urban - Introduced Shrub

No assessment is required for this habitat as the condition is fixed within the SBM as N/A.

APPENDIX D RELEVANT LEGISLATION AND POLICY

D.1 LEGISLATION

The BNGA has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:

- UK Government's 25 Year Environment Plan (DEFRA, 2018);
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (DEFRA, 2011);
- National Planning Policy Framework (NPPF) (MHCLG, 2023);
- The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006);
- The Environment Act (DEFRA, 2021);
- The London Plan 2021; and
- Camden Local Plan 2017.

The Environment Act, 2021

Under the Environment Act, 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, 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 off-site compensation, or the purchase of statutory credits.

The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the 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.

Under the Act, the enhancements must be maintained for at least 30 years.

This BNGA is an update to a previous assessment which was submitted to planning prior to the implementation of mandatory BNG. It therefore is not subject to mandatory BNG, but seeks to achieve a 10% net gain and improve the biodiversity value of the site.

D.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2023[9] 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.

Use of management plans to protect and sustain habitats

- The demolition and construction process can pose a significant risk to habitats and species, including green corridors. The Council may request a construction management plan for developments adjoining or within sites of high nature conservation value in order to protect biodiversity.
- Once a development has been completed, management and monitoring of habitats may be required. Management plans are used to ensure areas with nature conservation value are retained and reach their full potential. Monitoring can confirm that relevant environmental measures have been implemented successfully. Maintenance and monitoring may be secured through a planning condition or legal agreement

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] *UKHab Ltd (2020). UK Habitat Classification Version 1.1 (at https://www.ukhab.org).*
[7] *CIEEM (2017); Guidelines for Preliminary Ecological Appraisal, 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.*
[8] *BSI (2013); British Standard 42020:2013: Biodiversity – Code of practice for planning and development, BSI Standards Publication*
[9] *GOV.UK. (2023). National Planning Policy Framework. [online] Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2*