



Brighter strategies
for greener projects



Client: Notting Hill Home Ownership Ltd (NHHO)

Project: St Claire Business Park

Report: UGF

QUALITY ASSURANCE

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Prepared by:	Georgia Alfreds	[Name]
Authorised by:	Paul White	[Name]
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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd was commissioned to undertake an Urban Greening Factor (UGF) Assessment by Notting Hill Home Ownership Ltd (NHHO) of a site known as St Clare Business Park in Hampton Hill, London Borough of Richmond upon Thames.

This document is a report of this assessment and is submitted in support of a planning application which seeks the demolition of existing buildings and erection of 1no. mixed use building between three and five storeys plus basement in height, comprising 98no. residential flats (Class C3) and 1,172sq.m of commercial floorspace (Class E); 1no. three storey building comprising 893sq.m of commercial floorspace (Class E); 14no. residential houses (Class C3); and, associated access, external landscaping and car parking.

The assessment seeks to quantify the quality and quantity of urban greening, soft landscaping and habitat creation on site for biodiversity and water regulation. Targets are set within the London Plan¹ for all new residential and commercial developments.

The proposed development will achieve a UGF score of 0.59 exceeding the targets of 0.3-0.4.

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.

2.0 INTRODUCTION

Greengage was commissioned to undertake an Urban Greening Factor Assessment by Notting Hill Home Ownership Ltd (NHHO) of a site known as St Clare Business Park in Hampton Hill, London Borough of Richmond upon Thames.

This document is a report of this assessment and is submitted in support of a planning application which seeks the demolition of existing buildings and erection of 1no. mixed use building between three and five storeys plus basement in height, comprising 98no. residential flats (Class C3) and 1,172sq.m of commercial floorspace (Class E); 1no. three storey building comprising 893sq.m of commercial floorspace (Class E); 14no. residential houses (Class C3); and, associated access, external landscaping and car parking.

The assessment seeks to quantify the quality and quantity of urban greening, soft landscaping and habitat creation on site for biodiversity and water regulation. Targets are set within the London Plan for all new residential and commercial developments. A target score of 0.3 for commercial and 0.4 for residential developments has been set. This report seeks to assess compliance against these targets.

1.1 SITE DESCRIPTION

The survey area extends to approximately 0.9 hectares and is centred on National Grid Reference TQ 14191 70890, OS Co-ordinates 514191, 170890.

The site contains ten buildings and surrounding hardstanding, which can be accessed from Holly Road from the south and Windmill Road from the north.

The site is located in Hampton Hill, approximately 100m west of the High Street. The assessment site consists of office buildings and warehouses, surrounded by associated landscaping and car parking.

The site is bound to the west by the Shepperton branch railway line, by residential properties to the north and south, and mixed-use developments, including commercial and residential, to the east.

Open green space in the area includes Bushy Park, which is 100m to the east, a recreation ground, Fulwell golf club and a network of private gardens and street trees. Blue links include the nearby Longford River and the River Thames.

3.0 METHODOLOGY

Areas of each post-development habitat classification were measured using the proposal drawings by Levitt Bernstein and each parcel is matched to the closest typology within the London Plan. Each area is multiplied by the factor for that specific typology, and all factor scores are totalled and divided by the total site area to get the UGF score.

Proposed site layout drawings and landscaping plans were assessed. Specifically, the following drawings and documents were used:

- 3522-902-Planting Plan;
- 3522-901-Landscape Masterplan_P11;
- Design and Access Statement - Addendum;
- SCL-AHR-B1-R1-DR-A-20-016-P1 Roof Plan_P02;
- Arboricultural Survey (ref: PJC ref: 4707/17-01 Rev 01) and Arboricultural Impact Assessment (ref: PJC ref: 5368/19-01 Rev 02); and
- 3522-903-Tree retention & removal plan_P3.

Tree canopy areas were derived using the urban tree calculator in the Defra Metric 3.1, which calculates the tree size classes based on diameter at breast height, in conjunction with the tree retention and removal plan.

Table 3.1 UGF Factors (adapted from Table 8.2 of the London Plan)

Surface Cover Type	Factor
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site	1
Wetland or open water (semi-natural; not chlorinated) maintained or established on site	1
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm	0.8
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	0.8
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014	0.7
Flower-rich perennial planting	0.7
Rain gardens and other vegetated sustainable drainage elements	0.7
Hedges (line of mature shrubs one or two shrubs wide)	0.6

Surface Cover Type	Factor
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree	0.6
Green wall – modular system or climbers rooted in soil	0.6
Groundcover planting	0.5
Amenity grassland (species-poor, regularly mown lawn)	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014	0.3
Water features (chlorinated) or unplanted detention basins	0.2
Permeable paving	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone)	0

3.1 LIMITATIONS

The UGF methodology is solely concerned with post-development habitats. Therefore, it does not take into account pre-development habitats and does not compare pre- and post-development scores. As such, it is not within the UGF methodology to quantifiably assess whether the proposals will improve conditions at site.

3.2 COMPETENCIES

Georgia Alfreds, who undertook the assessment and wrote 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 7 years' experience in ecological survey and assessment.

Paul White, who reviewed this report, has a Bachelor's degree in Marine Biology (BSc Hons), a Natural England Great Crested Newt Licence (2018-38559-CLS-CLS) and Dormouse Licence (2020-44691-CLS-CLS), and is an Associate member of CIEEM. Paul has over 15 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was written by Georgia Alfreds and reviewed and verified by Paul White, 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.

4.0 RESULTS

The UGF score for the development is 0.59. The breakdown is provided in Table 4.1.

Table 4.1 UGF Breakdown

Urban Greening Factor Calculator				
Surface Cover Type	Factor	Area (m ²)	Contribution	Notes
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1	1,913	1,913	Retained trees
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1	0	0	
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8	0	0	
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.	0.8	0	0	
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.	0.7	1,534.1	1073.9	Biodiverse green roof
Flower-rich perennial planting.	0.7	854	597.8	P2 Ornamental planting mix & P3 Boundary planting mix
Rain gardens and other vegetated sustainable drainage elements.	0.7	0	0	
Hedges (line of mature shrubs one or two shrubs wide).	0.6	100	60	P1 Hedge planting mix
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6	1302	781.2	Scattered trees
Green wall –modular system or climbers rooted in soil.	0.6	0	0	
Groundcover planting.	0.5	705	352.5	P5 Podium planting mix

Urban Greening Factor Calculator				
Amenity grassland (species-poor, regularly mown lawn).	0.4	598	239.2	P4 Species rich mix lawn
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.	0.3	0	0	
Water features (chlorinated) or unplanted detention basins.	0.2	0	0	
Permeable paving.	0.1	0	0	
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0	4,774	0	Developed land; sealed surface
Total contribution			5,018	
Total site area (m ²)			8,565	
Urban Greening Factor			0.59	

The target for predominantly residential developments is 0.4, therefore the proposals exceed the target.

5.0 EVALUATION AND DISCUSSION

The proposals for St Clare's Business Park exceed the UGF targets for residential and commercial developments, achieving a UGF score of 0.59.

Intensive greening is provided. Mature trees are retained insofar as possible and all planting to be flower-rich to improve ecological value.

Finally, whilst the UGF assessment doesn't inherently involve a comparison with pre-development conditions, the proposals represent a significant improvement over the existing ecological value of the site.

APPENDIX A SITE PLAN AND PROPOSALS



Notes

1. Do not scale this drawing.
2. All dimensions must be checked on site and any discrepancies verified with the architect.
3. Unless shown otherwise, all dimensions are to structural surfaces.
4. Drawing to be read with all other issued information. Any discrepancies to be brought to the attention of the architect.
5. This drawing is the copyright of Levitt Bernstein and may not be copied, altered or reproduced in any form, or passed to a third party without license or written consent.

This is not a construction drawing. It is unsuitable for the purpose of construction and must on no account be used as such.

- Boundary of works
- (+0.00) Existing levels
- (+0.00) Proposed levels
- P1 Hedge Planting mix
- P2 Ornamental Planting mix
- P3 Boundary Planting mix
- P4 Lawn
- P5 Paddock Planting mix
- D1 Self-Guided Structure
- D2 Drop-off/Collection
- D3 Parking Trees
- AC.CA Tree canopy
- AC.PA Tree palmatum
- AL.GL Tree glaberrima
- BE.PE Tree pedunculata
- MALV Tree spicata
- MALLA Tree pedunculata
- PR.ALV Tree salix
- SO.ART Tree salix
- MO.AL Tree salix

DRAFT

P2 09-10-19	Issue for Planning	EM
P1 03-10-19	Issued for Planning	EM
Rev. Date	Description	Initials

Project name
St Clare Business Park
 Landscape
 Drawing number: **3522 - 902** Rev: **P2**

Planting Plan
 Previous issue: **Four for Planning** Date: **03/10/2019**
 Scale: **1:250 @ A1:1:500 @ A3** Drawn: **EM**
 Client: **Notting Hill Genesis** Checked: **SA**

Levitt Bernstein
 levittberstein.co.uk

London
 1 Kingsland Passage
 London E8 3BB
 +44 (0)20 7275 7676

Manchester
 3rd HO Building
 2 Arndale Street
 Manchester M3 3QS
 +44 (0)161 688 8740

APPENDIX B RELEVANT POLICY

A.1 REGIONAL

The London Plan

Policy G1 Green infrastructure

1. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.
2. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
3. Development Plans and Opportunity Area Planning Frameworks should:
 1. identify key green infrastructure assets, their function and their potential function
 2. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
4. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy G5 Urban greening

5. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
6. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. (excluding B2 and B8 uses).
7. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

Policy G6 Biodiversity and access to nature

8. Sites of Importance for Nature Conservation (SINCs) should be protected.
9. Boroughs, in developing Development Plans, should:

-
- a. use up-to-date information about the natural environment and the relevant procedures to identify SINC's and ecological corridors to identify coherent ecological networks
 - b. 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
 - c. 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
 - d. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
 - e. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
10. 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:
- a. avoid damaging the significant ecological features of the site
 - b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
 - c. deliver off-site compensation of better biodiversity value.
11. 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.
12. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

13. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
14. In their Development Plans, boroughs should:
- a. Protect 'veteran' trees and ancient woodland where these are not already part of a protected site
 - b. Identify opportunities for tree planting in strategic locations
15. Development proposals should ensure that, wherever possible, existing trees of quality are retained [Category A and B]. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-

canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

London Environment Strategy 2018²

The Mayor's Environment Strategy was published in May 2018. This document sets out the strategic vision for the environment throughout London. Although not primarily a planning guidance document, it does set strategic objectives, policies and proposals that are of relevance to the delivery of new development in a planning context, including:

Objective 5.1 Make more than half of London green by 2050

Policy 5.1.1 Protect, enhance and increase green areas in the city, to provide green infrastructure services and benefits that London needs now.

This policy states:

“New development proposals should avoid reducing the overall amount of green cover and, where possible, seek to enhance the wider green infrastructure network to increase the benefits this provides. [...] New developments should aim to avoid fragmentation of existing green space, reduce storm water run-off rates by using sustainable drainage, and include new tree planting, wildlife-friendly landscaping, or features such as green roofs to mitigate any unavoidable loss”.

This supports the ‘environmental net gain’ approach promoted by government in the 25 Year Environment Plan.

Proposal 5.1.1.d The London Plan includes policies to green streets and buildings, including increasing the extent of green roofs, green walls and sustainable drainage.

Objective 5.2 conserving and enhancement wildlife and natural habitats

Policy 5.2.1 Protect a core network of nature conservation sites and ensure a net gain in biodiversity

This policy requires new development to include new wildlife habitat, nesting and roosting sites, and ecologically appropriate landscaping will provide more resources for wildlife and help to strengthen ecological corridors. It states:

“Opportunities should be sought to create or restore priority habitats (previously known as UK Biodiversity Action Plan habitats) that have been identified as conservation priorities in London [and] all land managers and landowners should take BAP priority species into account”.

A.2 LOCAL POLICY

London Borough of Richmond Upon Thames - Local Plan (adopted July 2018)

Whilst the draft local plan is in development, the current local plan for Richmond Upon Thames looks ahead to 2033 and identified where the main developments will take place.

Policy LP 12 - Green Infrastructure

Green infrastructure is a network of multi-functional green spaces and green features, which provides multiple benefits for people, nature and the economy.

A. To ensure all development proposals protect, and where opportunities arise enhance, green infrastructure,

the following will be taken into account when assessing development proposals:

- a. the need to protect the integrity of the green spaces and features that are part of the wider green infrastructure network; improvements and enhancements to the green infrastructure network are supported;
- b. its contribution to the wider green infrastructure network by delivering landscape enhancement, restoration or re-creation;
- c. incorporating green infrastructure features, which make a positive contribution to the wider green infrastructure network.

Policy LP 15 - Biodiversity

A. The Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats. Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats including National Nature Reserves, Sites of Special Scientific Interest (SSSI) and Other Sites of Nature Importance as set out in the Biodiversity Strategy for England, and the London and Richmond upon Thames Biodiversity Action Plans. This will be achieved by:

1. 1. protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value;
2. 2. supporting enhancements to biodiversity;
3. 3. incorporating and creating new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate; major developments are required to deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible;
4. 4. ensuring new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;
5. 5. enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and
6. 6. maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.

B. Where development would impact on species or a habitat, especially where identified in the relevant Biodiversity Action Plan at London or local level, or the Biodiversity Strategy for England, the potential harm should:

3. firstly be avoided (the applicant has to demonstrate that there is no alternative site with less harmful impacts),
4. secondly be adequately mitigated; or
5. as a last resort, appropriately compensated for.

REFERENCES

¹ Greater London Authority (2021) *The London Plan: The Spatial Development Strategy for Greater London (GLA)*

² Greater London Authority (2018). *London Environment Strategy 2018*. London: Greater London Authority.