Ecological Impact Assessment and Biodiversity Net Gain Report 'Addendum'

Homebase North Sheen, Richmond, London

25th May 2023

TG Report No. 11778_R02e_WW_CW

Tyler Grange

Report No:	Date	Revision	Author	Checked
117784_R02e	25th May 2023	E	Will Wells BSc	Mari Jones BSc MSc, Aaron Grainger BSc MSc MCIEEM

Contents:

Appendices:

Plans:

Section 1: Introduction

1.1. This report has been prepared by Tyler Grange Group Limited on behalf of Avanton Richmond Developments Ltd. It sets out the findings of an updated site walkover and Phase 1 habitat survey undertaken on Homebase North Sheen, hereinafter referred to as the 'site'. The site is centred on National Grid Reference TG 18904 75434. See the Habitat Features Plan **11778/P02** for an indicative red line boundary.

1.2. A Phase 1 habitat survey was conducted on the 8th of August 2018 of the site, and an additional section of the site was surveyed on the 14th of January 2019. The findings of these surveys can be found in Preliminary Ecological Appraisal report (**11778/R01d**). Both of these surveys were completed over two years ago, and an updated walkover was therefore required to inform the planning application and completed on the 3rd October 2022. The results of this update survey have been used to inform this report.

1.3. A planning application for the redevelopment of the Site was submitted to London Borough of Richmond upon Thames ('LBRuT') in February 2019 (ref. 19/0510/FUL) (the 'Application') and was considered at LBRuT Planning Committee on 03 July 2019. On 29 July 2018, it was confirmed that the Mayor of London would act as the Local Planning Authority for the purposes of determining the application. The scheme was amended in following discussions with Officers at the Greater London Authority (GLA) and the amended scheme was considered at a Mayoral Representation Hearing on 01 October 2020. In November 2021, an updated scheme was submitted and the GLA published their update report, which maintained the resolution to grant planning permission.

1.4. Due to the time that has lapsed since the Mayoral Representation Hearing, a thorough review of the proposal has been undertaken by the Applicant to ensure that the scheme is compliant with the current policy context. This report informs the Amended Proposed Development.

1.5. This report should be read in conjunction with the Preliminary Ecological Appraisal Report (**11778/R01d**).

Purpose

1.6. This report:

- Highlights any changes on site between the previous report (**11778/R01d**) and this report, with the previous report having been read before this report to give details on the specifics of the site;
- The findings of the previous report remain valid, and this report serves to update the findings of the previous report (**11778/R01d**);
- Uses available previous data and results of the field surveys to describe and evaluate the ecological features present within the likely "Zone of Influence"[1] (ZoI) of the proposed development;
- Describes the post development habitats associated with the amended Proposed Development and to update the impacts and mitigation section with the new proposal and update the Biodiversity Net Gain calculation;

- Where appropriate, makes commitments for mitigation measures for adverse effects on ecological features as well as ecological enhancements, to ensure conformity with policy and legislation listed in **Appendix 1**; and

- Can be used to inform a planning application for the site's development.

1.7. This assessment and the terminology used are consistent with the Guidelines for Preliminary Ecological Appraisal and the Guidelines for Ecological Impact Assessment. A full methodology is set out in **Appendix 2**.

Limitations

1.8. The weather conditions were optimal during the survey visit and therefore do not pose any limitation to the interpretation of the survey results. The survey was carried out in October and as such some plants could not be identified, however this has not affected the categorisation of habitats found on site.

Quality Assurance

1.9. This report has been prepared by Will Wells BSc, a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and has been subject to a formal review by a full member of CIEEM as part of the Tyler Grange (TG) quality assurance process.

1.10. All ecologists at Tyler Grange Ltd are members of CIEEM and abide by the Institute's Code of Professional Conduct[1].

[1] CIEEM's Code of Professional Conduct https://cieem.net/resource/code-of-conduct/ [Accessed 11/10/2022]

Section 2: Protected sites, Habitats and Potential for Protected Species

Protected sites

2.1 The protected sites around the site remain the same as they were at the time of the initial report (**11778/R01d**), issued in February 2019, and as such are not repeated here.

Habitats

2.2 Locations of all habitats presented below are shown on Habitat Features Plan **11778/P02** (Page 24). The habitats are the same as those described in **11778/R01d**.

2.3 The site consisted of amenity grassland, buildings and hardstanding, dense scrub, ephemeral vegetation, introduced shrub, scattered broadleaved trees, scattered scrub, and tall ruderal vegetation habitats in 2019. These habitats were all still present on site during the site visit in 2022 and the location, condition and extent of these habitats have not changed since 2019.

2.4 A condition assessment of these habitats has been undertaken as part of the updated Biodiversity Net Gain assessment as set out in Section 4.

Species

2.5 The species that can use the site and are likely to be found there have not changed between the two surveys and as such the findings detailed in the previous report (**11778/R01d**) still remain valid.

2.6 No entry points or potential roost features were identified during the updated potential bat roost assessment (PBRA) of the buildings. The site is therefore considered to have **negligible potential** for roosting bats.

Section 3: Potential Impacts, Mitigation and Enhancements

3.1 The proposed development requires the demolition of the existing buildings and redevelopment of the site with the construction of four new buildings with associated hard and soft landscaping, consistent with the Original Proposal.

3.2 The Amended Proposed Development associated with this report presents minor variations to previous landscape plans, the details of which are listed below;

- Increased areas of modified grassland;
- An area of native buffer planting not found on the previous applications;
- More urban tree planting.

3.3 The increased tree planting, in combination with the native buffer planting can result in an increase in nesting birds due to an increase in viable habitat for this species group.

3.4 The potential impacts on protected sites and species are consistent with those outlined in the previous report (**11778/R01d**) and as such are not repeated here.

3.5 There are various enhancement strategies for species found on and around the site that should be considered and implemented and will be shown in the Landscape and Ecological Management Plan (LEMP). These include: -

- Placement of bug hotels within terrace gardens, sedum roofs and newly created habitats, and the inclusion of bee bricks within suitable brick walls, across the site to encourage insects to the site;
- Bird boxes on trees that will be retained or installed on low levels of new buildings constructed;
- Swift bat boxes on high-rise buildings and sensitive lighting solutions such as timers or hoods on lights to prevent excessive disturbance of commuting bats along the south and west boundaries of the site;
- Integration of hedgehog boxes into suitable retained habitat or newly created habitats to facilitate and encourage hedgehog use of the site.

Section 4: Biodiversity Net Gain Assessment

4.1 A development achieves biodiversity net gain (BNG) when the total biodiversity units present post development is higher than that of the biodiversity units present on site prior to development.

4.2 At the time of the original assessment (2019), the DEFRA's 2.0 BNG Metric was the most up-to-date calculation and, as such, was used to calculate the BNG for the proposals. Since 2019, three new iterations of the BNG metric have been released. It is acknowledged that an updated BNG metric (version 4.0) was published on 24th March 2023. However, Natural England's advice states that "*Users of previous versions of the Biodiversity Metric should continue to use that metric (unless requested to do otherwise by their client or consenting body) for the duration of the project it is being used for. This is because users may find that certain biodiversity unit values generated in biodiversity metric 4.0 will differ from those generated by earlier versions.*"[2]. Therefore, as the 3.1 metric was already in use at the time of the publication of version 4.0, version 3.1 has continued to be used for the purposes of this assessment. The updated BNG assessment for the Amended Proposed Development utilises the DEFRA's BNG Metric 3.1 and accounts for the updated landscape proposals (**Appendices 3 and 4**).

4.3 Habitats present at baseline (existing) and post-development (proposed) are set out below. Habitat measurements are rounded to two decimal places within the BNG metric and therefore habitats measuring as smaller than 0.005 ha have not been entered into the BNG metric and are not discussed below.

Existing Habitats

4.4 The following habitats are present within the red line boundary of the site and are shown on Habitat Features Plan (**11778/P02**). A summary of each habitat is provided below along with the habitat condition and category it is assigned within the BNG metric. No linear habitats were present. The rationale for condition assessments is detailed within the metric (**11778/BNG**), which is submitted as a separate document.

Baseline habitat areas and condition

- **Modified grassland (0.02 ha)**: This category includes areas of improved grassland habitat within the site and has been assigned a condition of "poor".
- **Bare ground (0.01 ha):** This category a small area of unvegetated ground. A lack of vegetation has resulted in this habitat being given the condition "poor".
- **Introduced Scrub (0.06 ha):** This category includes small areas of planted shrub around the site. The condition assessment only allows for N/A – Other for this habitat type.
- **Urban Tree (0.53 ha):** This category includes all the trees found within the site and has been assigned a condition of "moderate".

[2]Natural England (2021) The Biodiversity Metric 3.1 (JP039), [Online] Available at: https://publications.naturalengland.org.uk/publication/6049804846366720 [Accessed: 06/04/2023]

- **Developed land; sealed surface (1.65 ha):** This category includes all the hardstanding and buildings found on site. The condition assessment only allows N/A – Other for this habitat type.

- **Mixed scrub (0.10 ha):** This category includes the area of scrub surrounding the site and has been assigned a condition of "poor".

Proposed Habitats

4.5 The landscape proposals (**Appendices 3 and 4**) have been used to calculate the proposed habitat areas, as shown on the Post-development Habitat Plan (**11778/P03a**). A summary of each habitat is provided below along with the habitat condition and category it is assigned within the Defra 3.1 biodiversity net gain metric. The rationale for target condition assessments is detailed within the BNG metric (**11778/BNG**).

Proposed habitat areas and target condition

- **Developed land; sealed surface (1.27 ha**): This category includes the hardstanding (car parking and paths) and buildings within the site in addition to areas beneath the ground-based green wall (see below). Habitat condition is not applicable to this category;

- **Urban Tree (5.26 ha):** This category includes trees planted as a buffer around the proposed development. This habitat is expected to achieve the condition moderate. This habitat is overlayed on other habitats and is not included in calculating the total site area;

- **Ground Based Green Wall (0.12 ha):** This category includes native buffer planting mix and is expected to achieve moderate condition;

- **Other Green Roof (0.21 ha):** This category includes the biodiverse brown roof planting and as such a condition assessment is N/A;

- **Introduced Shrub (0.02 ha):** This category includes the planters placed on the roofs of the buildings being constructed on site and as such a condition assessment is N/A; and

- **Modified Grassland (0.34 ha):** This category includes the planting around the site of varies mixtures such as reinforced grass, lawn and amenity grassland mixture and is expected to achieve the condition moderate.

Results

4.6 The post-development biodiversity value of the site was calculated at 18.31 habitat units, demonstrating a +279.94% net gain in biodiversity value from the proposed development. A summary of headline results from the 3.1 Defra Metric is provided in **Figure 4.1** below. A full copy of the BNG metric (reference: **11778/BNG**) is supplied separately to this report for detailed reference.

On-site baseline	Habitat units	4.82
	Hedgerow units	0.00
	River units	0.00
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	18.31
	Hedgerow units	0.00
	River units	0.00
On-site net % change (Including habitat retention, creation & enhancement)	Habitat units	279.94%
	Hedgerow units	0.00%
	River units	0.00%
Off-site baseline	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	13.49
	Hedgerow units	0.00
	River units	0.00
Total on-site net % change plus off-site surplus (including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	279.94%
	Hedgerow units	0.00%
	River units	0.00%
Trading rules Satisfied?	No - Check Trading Summary ▲	

Figure 4.1: Headline results from the BNG 3.1 metric

4.7 Given the net gain of +279.94% habitat units the proposed development would comply with all relevant legislation regarding measurable net gain in biodiversity. This includes policy LP15 of the Richmond plan and Policy G6 of the London Plan (see **Appendix 1**).

4.8 It is acknowledged that the trading rules within the Defra Biodiversity Metric 3.1 are not satisfied due to the loss of 0.40 habitat units from removal of mixed scrub that is not due to be replaced with the same broad habitat type or a higher distinctiveness habitat. However, when applying professional judgement and considering the significant overall net gain achieved within the site in addition to scrub habitat being relatively common and widespread, the proposals are considered to be of greater benefit to biodiversity than retaining the relatively small (0.1 ha) area of mixed scrub habitat.

Management

4.9 The results of the DEFRA 3.1 metric are based on the habitats within the site being maintained at a certain condition, as prescribed by the condition assessment sheets published by DEFRA.

4.10 Details of habitat establishment and long-term management should be provided through the production of a LEMP. The LEMP would set out the prescriptions for the establishment and maintenance of the habitats on site for 30 years and can be secured by a suitably worded planning condition.

Section 5: Conclusions

5.1 It is assumed that the following details from the previous report (**11778/R01d**) have been read prior to this report:

- Citations of both national and international protected sites;
- Species data for all groups listed.

5.2 The changes between the previous landscape proposals and the current proposals are listed below:

- Increased areas of modified grassland;
- An area of native buffer planting not found on the previous applications;
- More urban tree planting.

5.3 The habitats on site were found to be of **negligible ecological importance**, and no specific mitigation is required for their loss.

5.4 The Biodiversity Net Gain final score was +279.94%, demonstrating a net gain on site.

5.5 The previous conclusions as mentioned in **11778/R01d** remain valid and the proposals are in line with the policies as mentioned in Section 15 of the 2021 NPPF and Policy G6 of the 2021 London Plan (**Appendix 1**) .

Appendix 1: Legislation

Legislation

A1.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:

- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2018;
- The Countryside and Rights of Way (CRoW) Act 2000; and
- The Natural Environment and Rural Communities Act (NERC) 2006.

A1.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2018 (as amended).

A1.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.

A1.4. The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Office of the Deputy Prime Minister (ODPM) Circular 06/2005: Biodiversity and Geological Conservation - Statutory Obligations and their Impact within the Planning System

A1.5. ODPM Circular 06/05 was prepared to accompany PPS9, however continues to be valid, and material in the consideration of planning applications since PPS9's replacement by the NPPF.

A1.6. ODPM Circular 06/05 provides guidance on applying legislation in relation to nature conservation and planning in England. Part I considers the legal protection and conservation of internationally designated sites (namely candidate Special Areas of Conservation (cSACs), SACs, potential Special Protection Areas (pSPAs), SPAs and Ramsar sites) and Part II considers the legal protection and conservation of nationally designated sites, namely Sites of Special Scientific Interest (SSSIs).

A1.7. Part III considers the protection of habitats and species outside of designated areas (particularly UK Biodiversity Action Plan species and habitats, which it states are capable of being a material

consideration in the preparation of local development documents and the making of planning decisions.

A1.8. Part IV considers species protected by law and states that the presence of a protected species is a material consideration in the consideration of a development proposal that, if carried out, would be likely to result in harm to the species or its habitat and that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.

National Planning Policy

National Planning Policy Framework (NPPF), July 2021

A1.9. *The National Planning Policy Framework (NPPF) was updated in July 2021 and sets out the Government's planning policies for England and how these should be applied. It replaces the National Planning Policy Framework published in July 2019.*

A1.10. *Paragraph 11 states that:*

"Plans and decisions should apply a presumption in favour of sustainable development."

A1.11. *Section 15 of the NPPF (paragraphs 174 to 182) considers the conservation and enhancement of the natural environment including habitats and biodiversity (paragraphs 179-182)*

A1.12. Paragraph *174 states that planning and decisions should contribute to and enhance the natural and local environment by:*

- *"protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
- *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"*

A1.13. Paragraph *175 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.*

A1.14. Paragraph *179 states that in order to protect and enhance biodiversity and geodiversity, plans should:*

- *"Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and*

areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

- *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."*

A1.15. *When determining planning applications, Paragraph 180 states that local planning authorities should aim to conserve and* enhance *biodiversity by applying the following principles:*

- *"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;*
- *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."*

A1.16. *As stated in paragraph 181 the following should be given the same protection as habitats sites:*

- *"potential Special Protection Areas and possible Special Areas of Conservation;*
- *listed or proposed Ramsar sites; and*
- *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."*

A1.17. *Paragraph 182 states that the presumption in favour of sustainable development does not apply where the planned project is likely to have a significant effect on a habitat site (alone or in combination with other plans or projects) unless an appropriate assessment has concluded the plan or project will not adversely affect the integrity of the habitats site.*

Regional Planning Policy

The London Plan, The Spatial Development Strategy for Greater London, March 2021

A1.18. Policies relating to ecology and nature conservation can be found in Chapter 8: Green Infrastructure and Natural Environment, which are summarised as follows:

A1.19. Policy G1: Green Infrastructure

A. *London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.*

B. *Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.*

C. *Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:*

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.*

D. *Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.*

A1.20. Policy G5: Urban Greening

A. *Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.*

B. *Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).*

C. *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.*

A1.21. 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. *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.*

A1.22. Policy G7: Trees and woodlands

A. *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.*

B. *In their Development Plans, boroughs should:*
1) *protect 'veteran' trees and ancient woodland where these are not already part of a protected site*
2) *identify opportunities for tree planting in strategic locations.*

C. *Development proposals should ensure that, wherever possible, existing trees of value are retained. 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.*

Regional Panning Policy

Richmond Borough Council Local Plan 2018 - 2033[3]

A1.23. Policy *LP 9 Floodlighting*

[3] Richmond Council (2018), *Local Plan*, accessed at https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf (accessed on 16/11/2022)

Floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions. The following criteria will be taken into account when assessing floodlighting:

1. *the impacts on local character or historic integrity;*
2. *the impacts on amenity and living conditions;*
3. *the impacts on biodiversity and wildlife;*
4. *the benefits and impacts of the provision of floodlighting on the wider community;*
5. *the benefits and effects on the use and viability of the facility;*
6. *that it meets an identified need as set out within the council's playing pitch strategy;*

Favourable consideration will be given to the replacement or improvement of existing lighting where it provides improvements to existing adverse impacts.

A1.24. 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. *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. *supporting enhancements to biodiversity;*
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. *ensuring new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;*
5. *enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and*
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:

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

A1.25. Policy *LP 16 Trees, Woodlands and Landscape*

A. The Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.
B. To ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals, will:

Trees and Woodlands

1. *resist the loss of trees, including aged or veteran trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value; or felling is for reasons of good arboricultural practice; resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland;*
2. *resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value; the Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees;*
3. *require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT);*
4. *require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species is encouraged where appropriate;*
5. *require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations).*

The Council may serve Tree Preservation Orders or attach planning conditions to protect trees considered to be of value to the townscape and amenity and which are threatened by development.

Landscape

1. *require the retention of important existing landscape features where practicable;*
2. *require landscape design and materials to be of high quality and compatible with the surrounding landscape and character; and*
3. *encourage planting, including new trees, shrubs and other significant vegetation where appropriate.*

A1.26. Policy *LP 17 Green roofs and walls*

Green roofs and/or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual

impact. The aim should be to use at least 70% of any potential roof plate area as a green / brown roof.

The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated, where appropriate, if it has been demonstrated that a green / brown roof is not feasible.

The use of green / brown roofs and green walls is encouraged and supported in smaller developments, renovations, conversions and extensions.

Richmond Biodiversity Action Plan 2019[4]

This plan, launched in 2019, is the first major revision of the BAP since 2011 and provides an update of each of the original species and habitats plans with the exception of the Mistletoe SAP. Given the great success in propagating this species across LBRuT, it has not been included in the update. However, a further six species and four habitats have been added, bringing the total to eleven species and nine habitats. The newly-added habitat and species action plans are as follows:

- *Habitat Action Plans (HAP): Hedgerows, Neutral Grassland, Private Gardens, and Rivers and Streams.*
- *Species Action Plans (SAP): Native Black Poplar, Hedgehogs, House Sparrows, Swifts, White-letter Hairstreak and Elm and Pollinators.*

New biodiversity targets have also been set for the period 2018-2022.

The main aims of this Richmond upon Thames Biodiversity Action Plan are:

- *To conserve and enhance the variety of habitats and species in LBRuT, in particular those which are of international or national importance, are in decline locally, are characteristic to the borough and/or have particular public appeal, which can raise the profile of biodiversity.*
- *To ensure that Richmond upon Thames' residents become aware of, and are given the opportunity to become involved in, conserving and enhancing the biodiversity around them.*
- *To raise awareness and increase stakeholder involvement in maintaining and, where possible, enhancing species and habitats of importance.*

Emerging Policy

A1.27. LBRuT are in the process of preparing a new Local Plan and currently anticipate consultation on the pre-publication (Regulation 19) will commence in early June 2023. Whilst the emerging plan is acknowledged, we note that it carries limited weight at this time due to its early stage of preparation and possibility for further amendments.

[4] Richmond Biodiversity Partnership (2019), *Biodiversity Action Plan*, accessed at https://habitatsandheritage.org.uk/wp-content/uploads/2020/10/Biodiversity-Action-Plan-Richmond_compressed.pdf (date accessed 16/11/2022)

Appendix 2: Methodology

Extended Phase I Habitat Survey

A2.1 A site walkover survey was conducted on the 3rd of October 2022 by Christian Cairns MSc, a Qualifying Member of CIEEM and an experienced field ecologist. The methods used during the walkover survey broadly followed methods used in an 'extended' Phase I habitat survey[5]. This technique provides an inventory of the habitat types present and dominant species. Note was taken of the more conspicuous fauna and any evidence of, or the potential for, the presence of protected notable flora and fauna.

A2.2 Additionally, the habitats identified were evaluated for their potential to support legally protected and notable fauna species.

Preliminary Bat Roost Assessment

A2.3 A Preliminary Bat Roost Assessment (PBRA) of the trees present within the site was undertaken to assess their suitability to support roosting bats. This survey was undertaken alongside the 'extended' Phase I habitat survey. The surveys followed standard methodologies[6][7] which are described below.

A2.4 Evidence of the presence of bat roosts was also sought. These signs included:

- Presence of bats;
- Bat droppings in, around or below a potential roost feature (PRF);
- Odour emanating from a PRF; and
- Visible staining below a PRF.

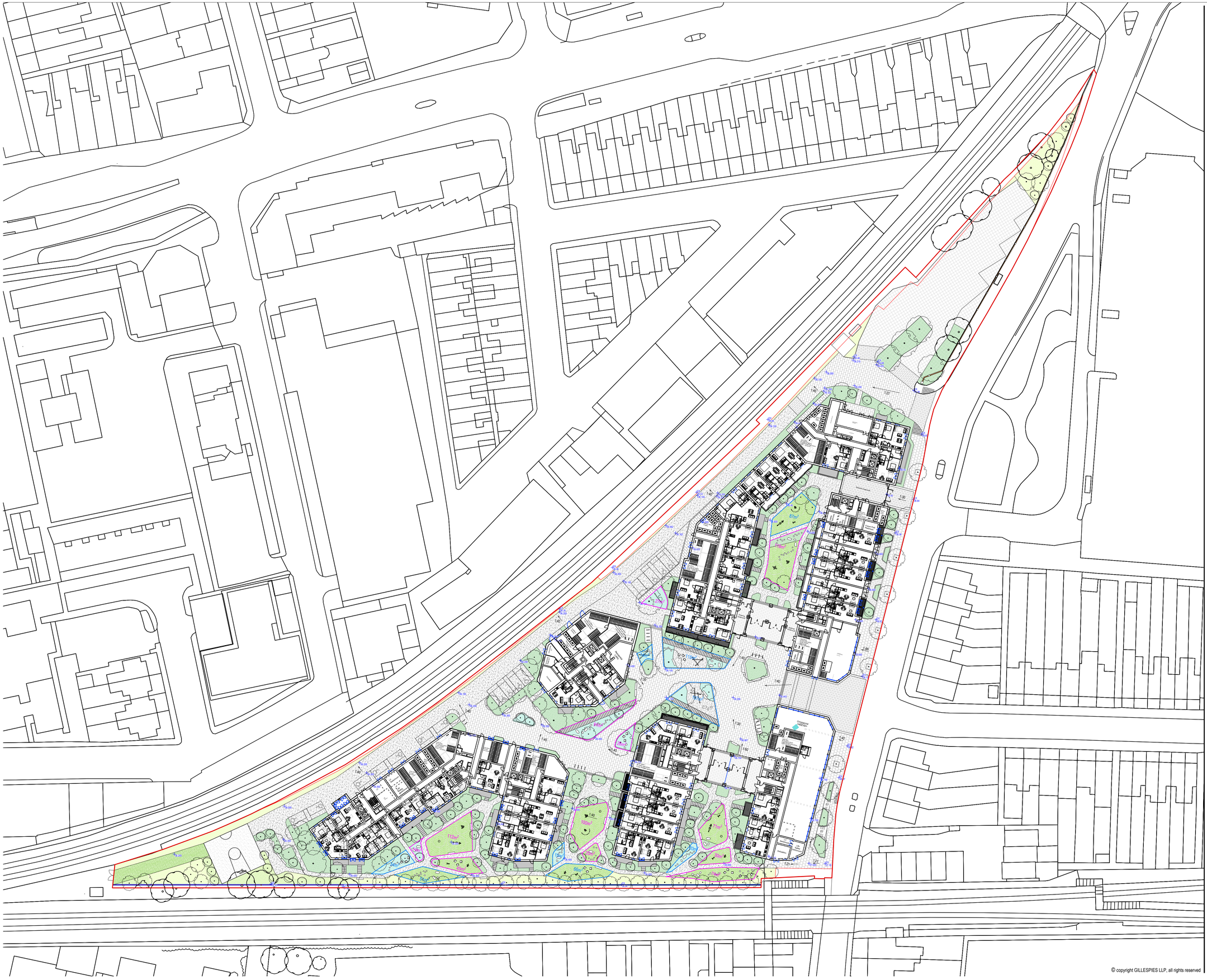
A2.5 The potential for the onsite trees to support roosting bats has been categorised against the criteria described in **Table A2.1** below.

Table A2.1 – Roost Assessment Criteria[8]

Suitability	Description of Roosting Habitats
Negligible	Negligible habitat features likely to be used by roosting bats.
Low	A tree with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).
Moderate	A tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
High	A tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for long periods of time due to their size, shelter, protection, conditions and surrounding habitat.

[5] Joint Nature Conservation Committee (2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. JNCC, Peterborough.
[6] Mitchell-Jones, A.J. (2004). Bat Mitigation Guidelines. English Nature, Peterborough.
[7] Mitchell-Jones, A.J. and McLeish, A.P. (2004). Bat Workers' Manual. 3rd Edition. JNCC, Peterborough.
[8] Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd Edition. The Bat Conservation Trust, London.

Appendix 3: Roof Plan, P11559-00-001-100-17



rev	details	by	date
00	For information	AP	07.11.2018
01	For Planning	AP	29.01.2019
02	Inclusion of play areas	AP	28.03.2019
03	Revised play areas	GP	16.04.2019
04	Revised tree planting	GP	08.05.2019
05	Updated for addendum submission	PC	22.11.2019
06	Updated to revised Block E design	PC	08.01.2020
07	Issued as draft for review	PC	17.07.2020
08	Issued for planning	PC	24.07.2020
09	Red line update	CC	10.11.2021
10	Refuse store update	CC	15.11.2021
11	Flooding update	PC	10.11.2022
12	Addendum issue	PC	14.11.2022
13	Updated to comments	PC	18.11.2022
14	Updated to comments	MH	14.12.2022
15	Updated to comments	MP	05.01.2023
16	Updated GF door positions	MP	17.03.2023
17	Updated GF door positions	PC	22.05.2023

Notes

1.0 Do not scale from drawing, use figured dimensions only
1.1 All dimensions to be checked onsite
1.2 This drawing to be read in conjunction with all other Gillespies drawings and specifications

GENERAL

- Concrete flags
- Granite paving with frame
- Granite slabs
- Granite setts
- Asphalt
- Resin bound paving
- High quality concrete block paving
- Private terraces
- Reinforced grass
- Existing paving retained
- Stepping stones
- Seating elements
- Play elements
- 2.4m Height Gates and Fences
- Proposed timber fence infill
- 2.4m max brick screen wall with climber planting
- Cycle stands
- Step with handrails and tactile paving to meet part M
- Lawn
- Proposed amenity planting mix
- Proposed rain garden planting mix
- Proposed native buffe planting mix
- Existing Trees
- Proposed Trees
- Planning Boundary
- 0-4 Play space Total: 721m2
- 5-11 Play space Total: 505m2
- EX 06.87 Existing surface level
- 06.750 Proposed surface leve
- 1:40 Surface gradient

N

Project title
Manor Road Richmond

Drawing title
Landscape General Arrangement

Drawing status	Scale	Drawn
PLANNING	1:500 @ A1	GP
	Date 13.10.2022	Checked RC
Drawing number		Revision
P11559-00-001-100		17

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Appendix 4: Landscape General Arrangement, P11559-00-001-101

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rev	details	by	date
00	For Planning	AP	30.01.2019
01	For Planning	GP	14.06.2019
02	Updated for addendum submission	PC	22.11.2019
03	Issued as draft for review	PC	17.07.2020
04	Issued for planning	PC	24.07.2020
05	Red line update	CC	10.11.2021
06	Addendum issue	PC	14.11.2022
07	Issued for planning	MH	30.03.2023
08	Stair cores update to Assael base	PC	23.05.2023

Notes

1.0 Do not scale from drawing, use figured dimensions only
1.1 All dimensions to be checked onsite
1.2 This drawing to be read in conjunction with all other Gillespies drawings and specifications

N

Project title
Manor Road Richmond

Drawing title
Roof plan

Drawing status
PLANNING

Scale
1:500 @ A1

Drawn
MH

Date
30.01.2019

Checked
PC

Drawing number
P11559-00-001-101

Revision
08

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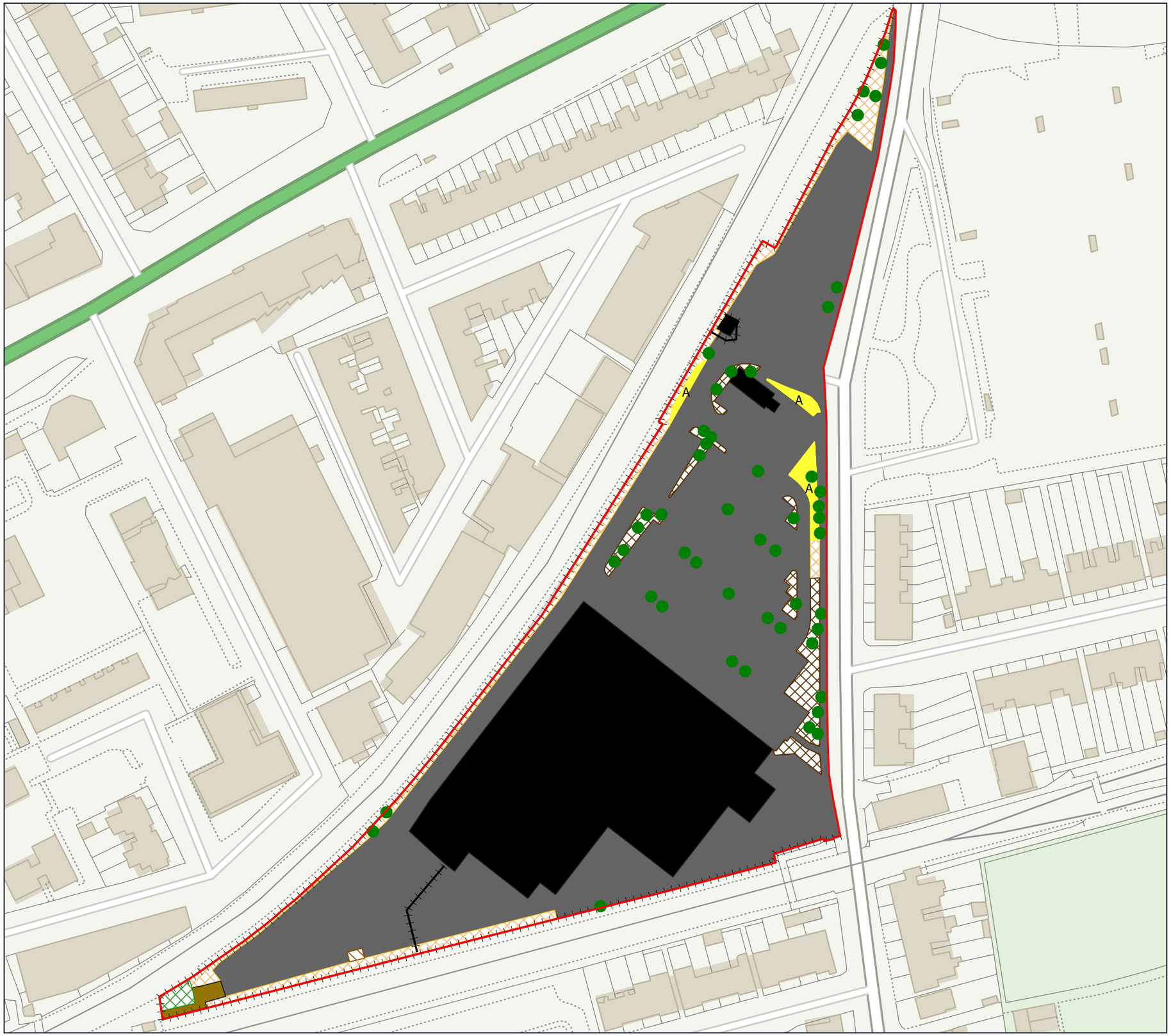
Plans

Plan 1: Habitat Features Plan 11778/P02

Plan 1: Post Development Features Plan 11778/P03a



Legend

- Indicative Site Boundary

Baseline Habitats

- Urban Trees
- Fence
- A — Amenity Grassland
- Bare Ground
- Hardstanding
- Dense Scrub
- Buildings
- Scattered Scrub
- Tall Ruderal
- Introduced Scrub

N

0 30 60 m

Project	Homebase North Sheen
Drawing Title	Habitat Features Plan
Scale	As Shown (Approximate)
Drawing No.	11778/P02
Date	November 2022
Checked	WW/AG

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Legend

- Indicative Site Boundary

Post-development Habitats

- Proposed Trees
- Retained Trees
- Buildings
- Hardstanding
- A — Modified Grassland
- Ground Based Green Wall
- Other Green Roof
- Introduced Shrub

N

0 30 60 m

Project	Homebase North Sheen
Drawing Title	Post Development Habitat Plan
Scale	As Shown (Approximate)
Drawing No.	11778/P03a
Date	April 2023
Checked	WW/AG

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