Ecological Assessment Report

Enderby Place, Greenwich Peninsula, London

Proposed construction of 567 Apartments

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Summary

S1. This report has been prepared by Redstone Ecology Ltd to inform a planning application to re-develop Enderby Place, Telcon Way, Greenwich, SE10 0AG.to a residential complex with associated landscaping (National Grid Reference TQ 39198 78803).

S2. The majority of the site comprises bare ground, hardstanding and areas of former building. Sections of sparsely vegetated land - ruderal/ephemeral are also present along with introduced shrub and green wall. The site is accessed from Telcon Way, a hardstanding road with pavements within modified grassland verges and scattered small to medium trees and bramble. Part of the site is fenced with hoarding. Enderby House is located to the south west of the site; however it falls outside of the site boundary. The River Thames is located to the west of the site on the far side of the Thames Path which forms the eastern boundary of the site. Adjacent commercial units are to the north.

S3. The hardstanding, bare ground and structures were of no inherent ecological significance and offered limited nesting bird habitat. The ruderal/ephemeral vegetation and green wall was not more than Site ecological importance and could potentially support nesting birds. The structures and single semi-mature sycamore tree were of Negligible potential for roosting bats. Precautions have therefore been adopted to ensure no impacts occur to breeding birds or contamination to the River Thames through contaminated run-off during the construction phase.

S4. The proposed landscaping and proposed bat and bird boxes would seek to provide a gain within both the Urban Greening Factor and the Biodiversity Net Gain Metric (+30.79 % for habitats and +100 % for hedgerow). This includes a landscaping strategy which would provide habitat for invertebrates, nesting and foraging birds and foraging bats.

S5. The proposed development would protect, maintain and enhance biodiversity in accordance with policies concerning G6 Biodiversity and access to nature and Policy G7 Trees and woodlands of the London Plan along with policies OS4 Biodiversity OS(e) Wildlife Deficiency Areas, OS(f) Ecological factors, OS(g) Green and River Corridors of the Royal Greenwich Local Plan (Adopted July 2014).

Section 1: Introduction

Introduction

1.1. Redstone Ecology Ltd was commissioned by Maritime View Ltd to produce an Ecological Assessment Report to support a planning application for a proposed residential application at Enderby Place, Telcon Way, Greenwich, SE10 0AG, which is a disused parcel of commercial land at National Grid Reference TQ 39198 78803. This report was undertaken following BS42020:2013 and Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines (2018). The report contains the following sections:

- Results of the desk study and extended phase 1 habitat/UK Habs survey for the site;
- Assessment of the impacts of the proposals on protected sites, habitats and notable/protected species;
- Provision of mitigation and enhancement measures for adverse impacts;
- Biodiversity Net Gain Metric; and,
- Summary of residual effects i.e. those occurring after mitigation.

Figure 1: Aerial photograph showing site location

Legislation and planning policy

National planning policy

1.2. The Government's key national planning policy is set out in the National Planning Policy Framework (NPPF), published in 2023. The NPPF includes the Government's policy on the protection of biodiversity through the planning system. It states that local plan policies and planning decisions should seek to minimise impacts on biodiversity and provide net gains in biodiversity. Planning policies should promote the conservation, restoration and enhancement of priority habitats, ecological networks, and the protection and recovery of priority species populations (e.g. Habitats

and Species of Principal Importance under the NERC Act 2006). The full wording is included within Appendix 2.

Local planning policy

1.3. The London Plan is the Spatial Development Strategy for Greater London prepared by the Mayor of London. It forms part of the Development Plan for the borough of Kingston. The latest London Plan was formally published in March 2021. Relevant to the application the following polices apply Policy G6 Biodiversity and access to nature and Policy G7 Trees and woodlands.

1.4. Royal Greenwich Local Plan (Adopted July 2014) is relevant to the scheme. Of which policies OS4 Biodiversity OS(e) Wildlife Deficiency Areas, OS(f) Ecological factors and OS(g) Green and River Corridors are relevant. Full wording is provided within Appendix 2.

Wildlife legislation

1.5. The following wildlife legislation is relevant to the proposed development.

- Conservation of Habitats and Species Regulations 2017 (as amended).
- Wildlife and Countryside Act 1981 (as amended).
- Countryside and Rights of Way Act 2000.
- Natural Environment and Rural Communities Act 2006.

1.6. A summary of wildlife legislation with respect to species recorded in either the site and/or adjacent to the site boundary is provided in Appendix 2.

Methodology

Desk study

1.7. Information on statutory designated sites of nature conservation value within 1km, 2km and 10km of the site was obtained by searching the following websites and resources:

- Royal Greenwich Local Plan (Adopted July 2014); and,
- 2km and 10km using MAGIC website (www.magic.gov.uk).

Extended Phase 1 Habitat Survey/UK Habs Survey

1.8. An extended Phase I habitat survey of the site was undertaken on 2nd November 2023 by Sara Curtis an experienced ecological consultant and full member of CIEEM.

1.9. The habitat survey methodology was based on guidance set out in the 'Handbook for Phase I habitat survey' (JNCC, 2010). This entailed recording the main plant species and classifying and mapping broad habitat types present. The habitats were also classified under the UK Habs Classifications and condition as per the Natural England Biodiversity Net Gain 4.0 condition assessment.

1.10. During surveys, note was taken of the more conspicuous fauna, and any evidence of, or potential for the presence of protected or notable flora and fauna. A basic inventory of the habitats and a representative species list was produced. Where access allowed, adjacent habitats were also considered in order to assess the site within the wider landscape and to provide information with which to assess possible impacts within the context of the site boundary.

Bats

1.11. A Preliminary Roost Assessment of the building was undertaken on 2nd November 2023 accordance with standard bat survey protocols (Collins, 2023). This involved a detailed search of the exterior of any structures or trees for evidence of bats (e.g. bats, droppings, feeding remains, staining). Information on potential or actual bat access points and roost locations were also recorded.

1.12. Based on the survey results, the buildings and trees were categorised in line with current Bat Conservation Trust guidelines (Collins, 2023). As these were assessed as being of Negligible roost potential no further surveys were required to inform the assessment.

Birds

1.13. A search for evidence of nesting birds (i.e. active or disused nests) was undertaken during the building inspection on 2nd November 2023.

Survey limitations

1.14. All surveys were undertaken following best practice guidelines and no limitations were noted.

Definitions

1.15. The 'site' is defined by the application red-line boundary (see Appendix 3 and Habitat Plan) and is located around central grid reference TQ 39198 78803. The 'study area' extends to a 1km radius for protected and Priority Species records, including bat species, and 1km for non-statutory site designations, 2km for nationally designated statutory sites and 10km for internationally designated sites. Due to the scale of the proposed development this is considered sufficient to inform the potential impacts of the proposals.

Quality assurance and surveyor experience

1.16. The author, John Polley, has over 18 years' experience working in the ecological sector and is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). He has extensive experience of protected species survey and Natural England licensing. He holds a Class 2 (CL18) Natural England (NE) bat survey licence Class 1 (CL20a) Hazel Dormouse Licence and Class 2 (CL09) Great Crested Newt Licence. CIEEM's Code of Conduct was followed during the survey and reporting.

Section 2: Ecological Baseline

2.1. Ecological features within the site are described below, together with an assessment of their importance using a geographical frame of reference advocated by CIEEM (2018).

Protected Sites

2.2. The site is not covered by any statutory or non-statutory designation for nature conservation importance, although several designated sites are present in the study area, which are detailed the table below.

Table 2.1: Protected Sites

Designation	Site Details	Importance
European Protected Sites	**Epping Forest Special Area of Conservation (SAC)** Located approximately 9.4 km north of the site of the site and designated for the presence of the Annex I Habitats 9120 beech forests and 4010 wet heaths and 4030 dry heaths. In addition Annex II species Stag beetle *Lucanus cervus.*	International
Sites of Special Scientific Interest (SSSI)	No SSSI's are within the 2km study area. This site is located within a Site of Special Scientific Interest Impact Risk Zone however residential developments are not listed as a potential impact trigger.	National
Local Nature Reserve (LNR)	A single LNR is located within the 2km study area. This is Mudchute Park located c. 750 m west of the site.	National
Sites of Importance for Nature	Seven SINC's are located within 1 km of the site with the closest being the River Thames and tidal tributaries located c. 0.01 km west of the site. This watercourse provides habitat for fish and birds, creating a wildlife corridor running right across the capital.	Local

Conservation (SINC)		

Habitats and flora

2.3. Habitats present within the site, along with their ecological importance (CIEEM, 2018) are detailed in Table 2.2 and shown on Plan RSE 359 P01. Photos are shown in Appendix 1.

Table 2.2 Habitats

Habitat	Description	Importance
Developed Land/Sealed surface (Building and hardstanding)	An arched retaining wall lies along the northern boundary of the site. The wall is generally well sealed, with no obvious cracks or crevices, however some missing bricks are present along the top of the wall. Hardstanding tarmacked and paved footpaths and roads were located in the southern section of the site.	No inherent ecological importance.
Developed Land/Sealed surface (Bare ground)	Within the hoarding, the site is unmanaged and comprised development land; sealed surface including areas of bare ground where former buildings were present. This had limited vegetation.	No inherent ecological importance.
Sparsely vegetated land – Ruderal/ephemeral	Self-seeded ephemeral and ruderal vegetation is beginning to establish across the site and around the boundaries of the hoarding dominated by buddleia *Buddleja davidii* (a species listed on the London Invasive Species Initiative (LISI)) with occasional, scattered areas of Yorkshire fog *Holcus lanatus*, herb Robert *Geranium robertianium*, dandelion *Taraxacum officinale*, rosebay willowherb *Chamerion angustifolium*, pedunculate sedge *Carex pedunculata*, *euphorbia species*, sow thistle *Sonchus arvensis*, yarrow *Achillea millefolium*, white clover *Trifolium repens* and spear thistle *Cirsium vulgare.* In addition, buddleia, elder *Sambucus nigra,* goat willow *Salix caprea* and ivy *Hedera helix* are growing on and immediately adjacent to the wall along the northern boundary of the site. This included an area of damp gravel and unsealed surface located along the north of the site; all of which had established on crushed and compacted hardcore. These areas appear to have been damp for a while, with a maximum 5cm of water at the time of the survey with areas of bulrush *Typha latifoli*, sedge *Carex* sp., goat willow and common reed *Phragmites australis* beginning to establish. This habitat is common and widespread locally and has limited species diversity.	Site

Habitat	Description	Importance
Introduced Shrub	Introduced shrub planters were located within the southern section of the site surrounded by hardstanding. This also included small trees.	Negligible
Green wall - ivy	Scattered bramble *Rubus fruticosus* is located along the northern and eastern boundary of the site and encroaching ivy and hawthorn *Crataegus monogyna* are also present along the eastern boundary where a retained wall is present.	Site
Wider Area	Habitats in the wider area include buildings, street trees and the River Thames c. 0.01 km west from the site. Greenwich park is located c. 0.9 km south of the site.	Negligible to Local

Protected and Priority Fauna

Table 2.3: Protected Species

Species	Desk study	Site	Importance
Amphibians	There are no European Protected Species Licences within 2 km of the site for great crested newts *Triturus cristatus.*	No ponds are located within 250 m of the site and the site considered sub-optimal for breeding amphibians. Although water was present this was not considered to be permanent and was only present due to the recent high rainfall ahead of the walkover survey. Habitat offered limited foraging habitat. The presence of great crested newt was discounted due to lack of waterbodies and no EPSL being present for this species.	Site
Bats	There are no European Protected Species Licences within 2 km of the site for bats.	The building and semi-mature sycamore tree was of Negligible roost potential and the site provided limited foraging potential.	Site
Badgers	N/A	No evidence of badgers were recorded during the site walkover. The site provides limited habitat for this species.	Site
Birds	N/A	Pigeon were recorded during the site survey. Overall, the site is not considered to be of any particular ornithological interest although the shrubs could support breeding birds.	Site

Species	Desk study	Site	Importance
Hazel dormouse	No European Protected Species Licences are present within the 2km search for this species.	No habitats on site were considered suitable to support hazel dormouse and the presence of this species was discounted from the assessment.	N/A
Reptiles	N/A	The vegetation was considered sub-optimal for reptiles and as such the presence of this species was discounted from the assessment.	Site
Invertebrates	N/A	No invertebrate species were recorded during the site walkover however the scrub/shrub did provide habitat for these species and common species were assumed. The presence of notable species was considered unlikely due to the isolated areas of suitable habitat.	Site
Otter and water vole	N/A	No suitable habitat was present on site and the River Thames located c.10 m would not be impacted on and as such the presence of this species was screened out of the assessment.	Negligible
Plants	N/A	No schedule 8 species were recorded within the redline boundary. Buddleia is present within the site and is listed on the London Invasive Species Initiative (LISI). No Schedule 9 species were recorded within the redline boundary.	Negligible
Hedgehog	N/A	The site provides limited habitat for this species.	Site

Section 3: Assessment of ecological effects

The proposed development

3.1. The proposed development would comprise the clearance of the vegetation on site and remaining structures to allow for the construction of a residential complex with associated green space which would include creation of shrub, hedgerow, trees, green roof, rain gardens, wildflower meadow and ornamental planting. The plant mix would use species known to be of benefit for biodiversity including pollinators, foraging and nesting birds and foraging bats.

3.2. Bat and bird boxes would also be installed on the new building which would enhance the site for these species post development. With the landscaping and proposed boxes this would seek to provide a gain within the Urban Greening Factor and the Biodiversity Net Gain Metric (+30.79 % for habitats and +100 % for hedgerow).

Unmitigated effect during construction

3.3. Due to the scale of the works and distance from any designated sites no effects are predicted during construction. Precautionary measures would however be adopted to minimise impacts from dust, noise and silt laden run-off.

3.4. There is potential for construction works to cause impact to nesting birds. This is predicted to be a negative effect at Site Level.

3.5. There is a risk that construction works could impact on the water quality of the River Thames. This would be a negative impact at a Local level.

3.6. As such mitigation measures to ensure impacts are minimised/no legislation is breached would be implemented; refer to Section 4.

Post construction effects

3.7. No effects on designated sites of nature conservation value are predicted during the post-construction phase due to the type and scale of the proposals and distance from the sites and reasons for their designation. The site is outside the 6.3 km zone for potential recreational impacts on the Epping Forest. Furthermore impacts from air quality are not considered likely due to the distance of the site from the SAC.

3.8. No adverse impacts to protected or notable species are identified from the post-construction phase. Precautionary measures would be adopted to minimise impacts from lighting.

3.9. The proposed creation of shrub, trees ornamental planting/green roofs, rain gardens and wildflower grassland would provide an enhancement and mitigate for any loss of habitats. The created habitats would be of benefit to foraging/commuting bats and invertebrates. Therefore the overall post-construction impacts would be beneficial at the Site level long-term.

3.10. The proposed bat and bird boxes on the new building would provide an enhancement for bats and birds. Overall post construction impact to protected or notable species would be Negligible in the long-term.

Section 4: Mitigation, compensation and enhancement

Habitats

4.1. The proposals would include the planting of native and ornamental trees, shrubs, wildflower grassland, hedgerow, green roofs, rain gardens and ornamental planting which would significantly enhance the site for biodiversity and result in a net biodiversity gain of 30.79 % in habitat units and + 100 % for hedgerow (refer to separate Biodiversity Net Gain Metric, Redstone Ecology 2023 and below Section).

4.2. To ensure no impacts occur to the River Thames, which is located c. 10m of the site, standard construction safeguards, such as those provided by CIRIA (Charles, 2015), will take place in relation to noise, vibration, dust and contaminated run-off causing any impact. These measures will also ensure no impacts occur to any other SINC in the wider area.

Bats

4.3. Any external lighting required for health and safety/security would be cowled or recessed using warm white LED bulbs (Institution of Lighting Professionals & the Bat Conservation Trust 2023) to reduce the risk of light spill particularly to the offsite habitats to the west which includes the River Thames.

4.4. The proposed shrub, trees, ornamental planting, hedgerow, green roofs, rain garden and wildflower grassland would provide additional foraging and commuting habitat for bats. The bat boxes (6 integrated boxes) within the structure would provide additional roosting habitat for this species post development.

Birds

4.5. The bird nesting season typically runs from March through to the end of August. If it is necessary to start works in the bird nesting period, then a pre-works check for nesting birds should be undertaken by an ecologist. If nesting birds were found, work in that area would need to be delayed until all chicks had fledged.

4.6. The proposed shrub, trees, hedgerow, ornamental planting, green roofs, rain garden and wildflower grassland would provide additional foraging and nesting habitat for birds. The proposed bird boxes (6 integrated boxes) within the structure would provide additional nesting habitat for this species post development.

Invertebrates

4.7. The proposed shrub, trees, wildflower grassland, native hedgerow, ornamental planting, rain garden and green roofs would provide additional habitats for invertebrates.

Biodiversity Net Gain Assessment

4.8. The DEFRA Biodiversity Metric 4.0 was utilised to calculate the pre-development and predicted post-development biodiversity value of the site based on the proposed plans for landscaping (Refer to Appendix 3 and separate Biodiversity Net Gain Metric 4.0, Redstone Ecology 2023).

4.9. This metric operates by calculating the number of biodiversity units associated with a particular habitat type (both pre-and post-development) – the 'unit' value associated with each habitat type is calculated based on the following parameters:

- Size (in hectares)/Length (in km);
- Distinctiveness (i.e. how rare/valuable a given habitat is);
- Condition (i.e. how well the recorded habitat fits [or will fit] the standardised description of that habitat);
- Connectivity (i.e. how well-connected a given habitat is too similar habitats in the landscape); and
- Strategic significance (i.e. if the existing or proposed habitat is within an area formally adopted in the local plan for green infrastructure or biodiversity improvements).

4.10. When considering the creation of new habitats in the post-development site, other factors are also considered when calculating the 'unit' value of a given habitat and these are:

- Time to reach the target condition of each habitat; and
- Difficulty category for the creation of a given habitat.

4.11. A calculation has been undertaken using the baseline habitats identified during the UK Habs survey and created/enhanced habitats taken from the landscaping proposals (See Appendix 3). This has calculated that the proposals will result in gain of 30.79 % in habitat units and + 100 % for hedgerow.

4.12. The majority of the habitat identified in the baseline was that of buildings, hardstanding and bare ground with parcels of introduced shrub all of which do not have a condition assessment. Blocks of sparsely vegetated land – ruderal/ephemeral habitat were present which were of Moderate and Poor condition. A green wall formed the eastern boundary which was of Poor condition. Most of the new development is proposed within hardstanding, buildings and bare ground however this would also require the loss of ruderal/ephemeral vegetation. The proposals therefore include wildflower grassland (Modified of Poor condition due to potential amenity usage), introduced shrub (no condition), urban trees (Moderate condition) and green roof (Poor condition). Rain garden will be established which has been inputted as introduced shrub as this will likely include a similar mix of species which would be better suited to saturated soils. Hedgerow would be created and managed to achieve a minimum of a Poor condition.

4.13. These would all be managed under a Landscape and Ecological Management Plan for a minimum of a 30 year term.

Mechanism for mitigation delivery

4.14. The ecological mitigation measures detailed in this report could be secured through a planning condition.

Section 5: Residual effects and conclusions

Construction effects

5.1. Adverse effects on the River Thames could occur should contaminated run-off be allowed to enter this watercourse.

5.2. Adverse effects on birds could occur should clearance of vegetation be completed in bird breeding season.

5.3. Precautionary measures would be adopted to prevent any potential impact so no effects would occur during construction.

Post-construction effects

5.4. The proposed creation of native and ornamental trees, shrubs, wildflower grassland, hedgerow, green roof, rain garden and introduced shrub would provide an overall habitat enhancement that would be beneficial at the Site level in the long-term. This would result in the proposals achieving a Biodiversity Net Gain Score of 30.79 % in habitat units and + 100 % for hedgerow along with a positive score within the Urban Greening Factor.

5.5. Effects on protected and notable species in the post-construction phase are considered to be Negligible. The proposed landscaping and bat and bird boxes would provide supplementary habitat for a range of species including bats and invertebrates.

Conclusions

5.6. The proposed development would protect, maintain and enhance biodiversity in accordance with policies concerning G6 Biodiversity and access to nature and Policy G7 Trees and woodlands of the London Plan along with policies OS4 Biodiversity OS(e) Wildlife Deficiency Areas, OS(f) Ecological factors, OS(g) Green and River Corridors of the Royal Greenwich Local Plan (Adopted July 2014).

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Plans

Extended Phase 1 Habitat Survey / UK Habs Plan

Ops and Cons Plan

- Site Boundary
- Building
- Hardstanding
- Introduced Shrub
- Sparsely Vegetated Land - Ruderal/Ephemeral
- Vacant or Derelict Land
- Green Wall (Ivy)

0 10 20 m

Project	Enderby Place, London
Drawing Title	Habitat Features
Drawing No.	RSE 359/P01a
Date	November 2023
Checked	SC/JP

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To ensure no impacts occur to the adajcent River Thames, standard construction safeguards, such as those provided by CIRIA (CIRIA, 2015), will take place in relation to noise, vibration, dust and contaminated run-off causing any impact.

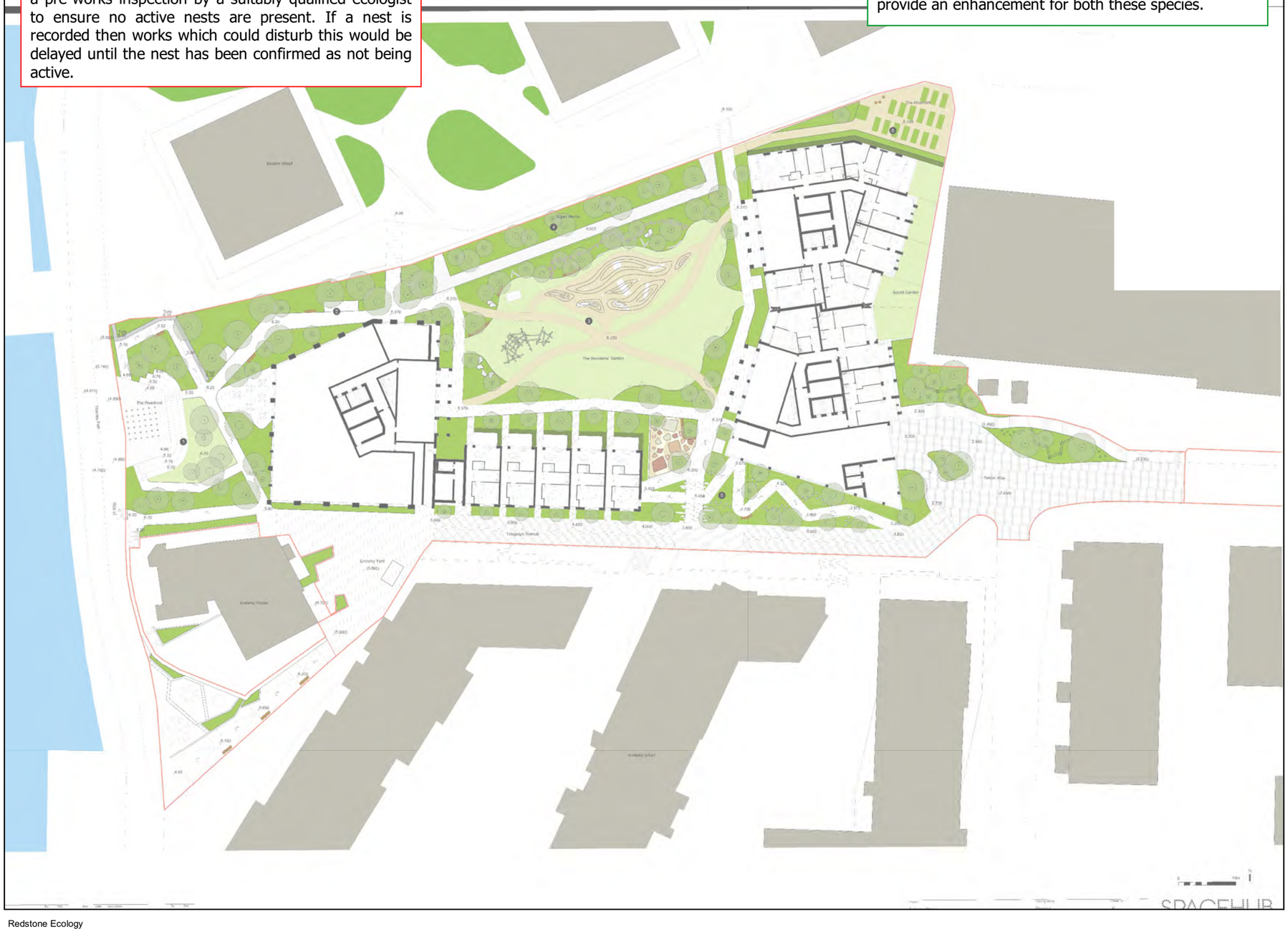
Removal of woody vegetation could potentially impact on nesting birds and as such works would either be completed outside of the bird nesting season (March to August inclusive) or the vegetation would be subject to a pre-works inspection by a suitably qualified ecologist to ensure no active nests are present. If a nest is recorded then works which could disturb this would be delayed until the nest has been confirmed as not being active.

The proposed planting of modified grassland, introduced shrubs, tree planting, intensive green roof and hedgerow planting would deliver a net gain of 30.79% in habitat units and 100% in hedgerow units.

This will provide an overall enhancement of the site for foraging and commuting bats, nesting and foraging birds and invertebrates.

Buddleia dominates the site and is listed on the London Invasive Species Initiative (LISI). As such, all part of buddleia plants should be removed, including roots and disposed of as controlled waste. Alternatively, specimens can be injected with a herbicide which will kill the plant prior to removal. Care must be taken when removing buddleia from the brickwork along the northern boundary of the site.

Proposed bat and bird boxes on retained trees would provide an enhancement for both these species.



Site Boundary

0 10 20 m

Project	Enderby Place, London
Drawing Title	Opportunity and Constraints
Drawing No.	RSE 359/P02a
Date	November 2023
Checked	SC/JP

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Appendix 1: Photographs of site

Photograph 1: Hardstanding and verge

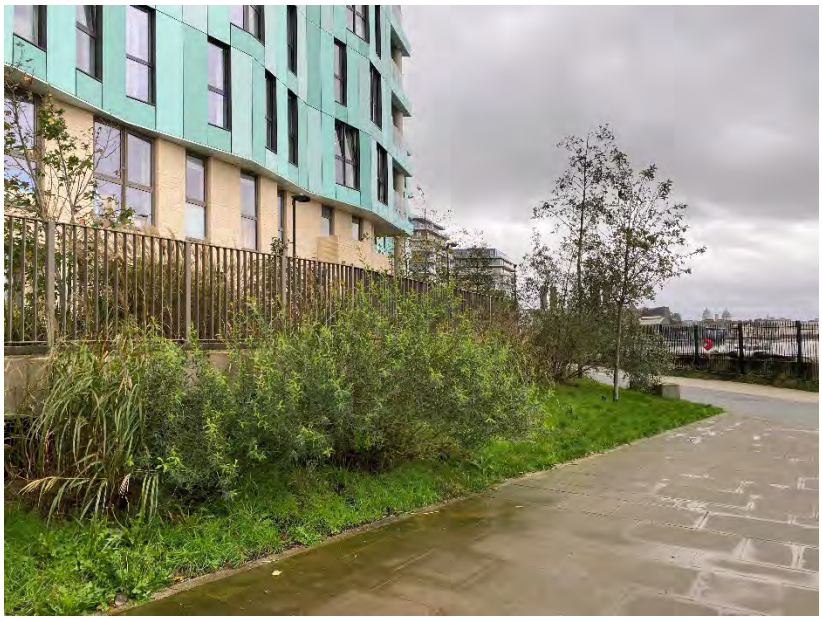
Photograph 2: Building on site

Photograph 3: Bare ground habitat

Photograph 4: Ruderal/ephemeral habitat. Green wall on far side of photo

Photograph 5: Ruderal/ephemeral habitat

Photograph 6: Sycamore tree



Photograph 7: Introduced shrub

Appendix 2: Legislation and Planning Policy

Legislative Context

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 2010 (as amended);
- The Countryside and Rights of Way (CRoW) Act 2000;
- The Hedgerows Regulations 1997;
- The Protection of Badgers Act 1992; 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 2010 (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.

Species and Habitats of Principal Importance and the UK Biodiversity Action Plan

A1.5. The UK Post-2010 Biodiversity Framework succeeded the UK BAP partnership in 2011 and covers the period 2011 to 2020. However, the lists of Priority Species and Habitats agreed under the UKBAP still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A Strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been succeeded, Species Action Plans (SAPs) developed for the UK BAP remain valuable resources for background information on priority species under the UK Post-2010 Biodiversity Framework.

A1.6. Priority Species and Habitats identified under the UKBAP are also referred to as Species and Habitats of Principal Importance for the conservation of biodiversity in England and Wales within Sections 41 (England) and 42 (Wales) of the Natural Environment and Rural Communities (NERC) Act 2006. The commitment to preserving, restoring or enhancing biodiversity is further emphasised for England and Wales in Section 40 of the NERC Act 2006.

National Planning Policy

National Planning Policy Framework (NPPF), July 2021

A1.7. The National Planning Policy Framework (NPPF) was published in July 2021 and sets out the Government's planning policies for England and how these should be applied.

A1.8. Paragraph 11 states that:

A1.9. “Plans and decisions should apply a presumption in favour of sustainable development.”

A1.10. Section 15 of the NPPF (paragraphs 174 to 178) considers the conservation and enhancement of the natural environment.

A1.11. Paragraph 174 states that planning policies and decisions should contribute to and enhance the natural and local environment by:

> a) “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);
>
> b) 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
>
> c) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”.

A1.12. 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.

A1.13. Paragraph 179 states that in order to protect and enhance biodiversity and geodiversity, plans should:

a) “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

b) 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.”

A1.14. When determining planning applications, Paragraph 175 states that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

a) “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;

b) 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;

c) 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

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be integrated as part of the design, especially where this can secure measurable net gains for biodiversity."

A1.15. As stated in paragraph 180 the following should be given the same protection as habitats sites:

a) "potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites; and

c) 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."

A1.16. 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) unless an appropriate assessment concluded the plan or project will not adversely affect the integrity of the habitats site.

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

A1.17. ODPM Circular 06/05 was prepared to accompany Planning Policy Statement 9 PPS9, however continues to be valid, and material in the consideration of planning applications since PPS9's replacement by the NPPF.

A1.18. 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).

A1.19. 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.

A1.20. 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.

Local Planning Policy

Royal Greenwich Local Plan: Core Strategy with Detailed Policies

Policy OS4 Biodiversity

A1.21. Royal Greenwich's rich biodiversity and geodiversity will be protected, restored and enhanced, including the priority habitats and species identified in the Greenwich Biodiversity Action Plan. There will be a presumption against the development of:

- Sites of Special Scientific Interest (SSSI) (as shown on the Proposals Map)
- Sites of Importance for Nature Conservation (SINC) (as defined on the Proposals
- Map and set out in tables 12-15);
- Local Nature Reserves (LNR) (as shown on the Proposals Map and set out in
- tables 12-15);
- Royal Greenwich's Regionally Important Geological and Geomorphological
- Site(RIGS): Dog Rocks in Plumstead Common; and
- Royal Greenwich's Locally Important Geological and Geomorphological Sites
- (LIGS): Bleak Hill Sandpits and Wickham Valley Brickworks complex

A1.22. Biodiversity enhancements will be encouraged particularly in areas that are currently deficient in accessible wildlife sites.

Policy OS(e) Wildlife Deficiency Areas

A1.23. In or near areas of wildlife deficiency the Royal Borough will take opportunities to secure the provision of areas to be managed as wildlife habitats and seek to maximise opportunities for access to suitable sites within areas of wildlife deficiency where this does not conflict with protecting wildlife habitats from disturbance.

Policy OS(f) Ecological Factors

A1.24. Development proposals will be expected to take account of ecological factors, in particular paying attention to the need for:

i. Consideration of the biodiversity and geological features of the site and the surrounding area, including protected species (Refer to Policy OS4). These features should be respected and the area's natural character enhanced;

ii. A survey of flora and fauna on Sites of Importance for Nature Conservation and on sites over one hectare to enable decisions to be made regarding their conservation;

iii. An appropriate level of survey to enable decisions to be made about the existing trees on the site. Development decisions will be based on the requirement:

- To protect trees and their root systems from damage as a result of the development both during and after building operations;

- To achieve an appropriate replacement of trees taking account of size, coverage and species where it is agreed that existing trees can be felled;

- That landscaping schemes should include environmentally appropriate planting using locally native species and demonstrate appropriate irrigation plans for landscaping; and

- To ensure that planting design does not impact negatively on personal safety and accessibility;

iv. The retention of trees and the protection and enhancement of natural and ecological features, tree ridge lines, green corridors, wildlife habitats, boundary walls, surface materials, hedges and other features where these will contribute to the biodiversity; and

v. The protection, enhancement and restoration of natural river features and corridors by appropriate landscaping and design.

Policy OS(g) Green and River Corridors

A1.25. The network of main green corridors and the ecological and wildlife value of Royal Greenwich's rivers, canals and lakes will be protected and enhanced. Development will not normally be permitted where it would damage the continuity of the wildlife habitat within the corridor.

Appendix 3: Proposed Development Plan

LEGEND

GENERAL

- Planning application boundary

CHARACTER AREAS

1. The Riverfront
2. Garden Approach
3. The Resident's Garden
4. Super Ha-Ha
5. Telegraph Avenue
6. The Secret Garden and the Allotments

GENERAL ARRANGEMENT

- Ramps + Flood wall
- Water Fountain
- Benches
- Mixed shrub and herbaceous planting
- Amenity grassland
- Hedges
- Existing surface level (X.XX)
- Proposed surface level X.XX
- Proposed surface fall 1:XX
- Play Trails
- Proposed Trees - 8m
- Proposed Trees - 6m
- Proposed Trees - 3m
- Play Elements
- Allotments - Raised beds
- Cycle stands

Rev	Date	Description	By	Chk
P01	17/11/23	DRAFT	YL	RS
P02	23/11/23	PLANNING	YL	RS

Rev	Date	Description	By	Chk

0 10m

N

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Project	Enderby Place
Client	Maritime View Ltd
Drawing title	Landscape General Arrangement Plan Ground Floor

Drawing status	Planning	Drawn by	YL
Date	25/09/2023	Checked	RS
Drawing number	8416-PL-X-GA-100	Rev	P02
		Scale	1:200 @ A0