



ROYAL ARSENAL RIVERSIDE
THE ROPEYARDS
PLOTS D & K

BIODIVERSITY NET GAIN
REPORT

To Support a Reserved Matters
Application

MARCH 2024

BERKELEY HOMES
(EAST THAMES) LIMITED



ECOLOGYSOLUTIONS

Part of the ES Group

THE ROPEYARDS,
ROYAL ARSENAL RIVERSIDE,
PLOTS D & K
(BUILDINGS D1, D2, D3, D4, D5
AND K3 K4, K5)

Biodiversity Net Gain Report

March 2024
10995.BNGReport.vf1

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1. INTRODUCTION

1.1. Background & Proposals

- 1.1.1. Ecology Solutions was commissioned by Berkeley Homes (East Thames) Limited in December 2022 to undertake a Biodiversity Net Gain assessment for the development known as Ropeyards, Royal Arsenal Riverside, Plots D & K (Buildings D1, D2, D3, D4, D5 and K3 K4, K5), hereafter referred to as the site.
- 1.1.2. The site is seeking to progress with a reserved matters application pursuant to the outline consent granted for 'The Waterfront Masterplan' which comprises a residential led development (outline planning permissions: 16/3025/MA). In addition to the new housing and commercial space, the development will provide new public realm.

1.2. Site Characteristics

- 1.2.1. The site is bounded by multiple apartments and their associated car parking, infrastructure and landscaping to the north; apartments, commercial properties, the Royal Arsenal Brass Foundry and associated infrastructure and landscaping to the east and the A206 and commercial buildings to the south-west. Beyond this, the town of Woolwich extends to the east, south and west and the River Thames lies to the north.
- 1.2.2. The northern section of the site comprises an open park formed from modified grassland and introduced shrub habitat, containing numerous scattered urban trees, intersected and surrounded by a series of footpaths and access roads. The central and southern sections of the site are dominated by developed land in the form of buildings, a car park and associated infrastructure, interspaced by small areas of modified grassland and introduced scrub, with an ornamental hedgerow and three urban trees also present in the southern corner of the site.

1.3. Biodiversity Net Gain Report

- 1.3.1. This document assesses the level of Biodiversity Net Gain of the development and has been prepared with due consideration to the guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM)^{1,2} in relation to Biodiversity Net Gain. This assessment is based on the results of the habitat surveys undertaken in February 2023 and January 2024, as set out within the Ecological Assessment (report ref: 10995.EcoAs.vf1 (complete)).

¹ CIEEM (2019). *Biodiversity Net Gain. Good Practice Principles for Development, A practical Guide.*

² CIEEM, CIRIA, IEMA (2016). *Biodiversity Net Gain: Good Practice Principles for Development.*

2. THE STATUTORY BIODIVERSITY METRIC

2.1. The Statutory Biodiversity Metric, which was released on 29 November 2023 and updated on 15 December 2023 and 12 February 2024, uses habitat features as a proxy measure for capturing the value and importance of nature. It uses calculations to assess the importance of each habitat based on its size, ecological condition and location.

2.2. Methodology

2.2.1. Measurements for pre- and post-development habitats were calculated using QGIS software. Information regarding the habitats currently present within and adjacent to the site, as well as their condition, were based on survey information obtained in February 2023 and January 2024.

2.2.2. Habitats were classified based on their conformity to UK Habitat Classifications³ and condition assessments were completed for habitats and hedgerows identified on-site. The Statutory Biodiversity Metric User Guide⁴ and Technical Annex 1⁵, in addition to professional judgment, were used to inform the habitats' condition criteria.

2.2.3. The post-development habitats were based on those detailed within the Planting Strategy plan provided by HTA Design LLP (see Appendix 1) and measured using QGIS software.

³ UKHab Ltd (2023). *UK Habitat Classification Version 2.0* at <https://ukhab.org>.

⁴ Department for Environment, Food and Rural Affairs (2024). *The Statutory Biodiversity Metric: User Guide*, DEFRA.

⁵ Department for Environment, Food and Rural Affairs (2024). *The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology*, DEFRA.

3. RESULTS AND DISCUSSION OF METRIC

3.1. This section should be read in conjunction with the Biodiversity Metric calculation tool which has been provided separately.

3.2. Baseline Habitat

3.2.1. Table 3.1 below summarises the habitats and hedgerows present on-site. The information included within this table is based on the results of the habitat surveys undertaken by Ecology Solutions in February 2023 and January 2024. The locations of these habitats are illustrated on Plan ECO2.

3.2.2. The modified grassland, introduced shrub, urban tree and developed land; sealed surface habitat on-site delivers a biodiversity value of 3.60 habitat units, with the hedgerow located towards the southern corner of the site valued at 0.01 hedgerow units.

Habitats						
Baseline Habitat (Ref)	Baseline Biodiversity Units	Condition Criteria / Pass or Fail		Condition	Ecological Features and Condition Notes	After Works
Modified Grassland (MG1 to MG10)	1.31	Grassland (low distinctiveness)		Poor (5 / 7 condition criteria passed excluding essential criterion A, required for achieving Moderate or Good condition = Poor)	Several parcels of modified grassland are predominantly contained within the northern section of the site, in the form of a well-managed open park, although a further two parcels of well-managed modified grassland are also present towards the southern corner of the site. Species present within the park include dominant Perennial Rye Grass <i>Lolium perenne</i> , frequent Yarrow <i>Achillea millefolium</i> and Common Chickweed <i>Stellaria media</i> , occasional Daisy <i>Bellis perennis</i> and Common Mouse-ear <i>Cerastium fontanum</i> and rare Dovesfoot Cranesbill <i>Geranium mole</i> , Burnet <i>Sanguisorba</i> sp., Common Ragwort <i>Senecio jacobaea</i> and Dandelion <i>Taraxacum officinale</i> . Species present in these southern parcels include dominant Perennial Rye Grass, abundant Common Chickweed and Dandelion, frequent Bent <i>Agrostis</i> sp. and Dovesfoot Cranesbill and rare Yarrow, Daisy, Cat's-ear <i>Hypochaeris radicata</i> and Common Ragwort. Due to the low species-richness of this habitat, it fails to achieve criterion A, requiring at least six to eight vascular plant species per square metre, essential for meeting 'Moderate' or 'Good' condition and is therefore limited to 'Poor' condition within the Biodiversity Metric. The entirety of this habitat will be lost under the development proposals.	1.31 units lost.
		A – There are six to eight vascular plant species per square meter, including at least two forbs.	Fail			
		B – The sward height is varied.	Fail			
		C – Scrub accounts for less than 20% of the total grassland area.	Pass			
		D – Physical damage is evident in less than 5% of the total grassland area.	Pass			
		E – The cover of bare ground is between 1% and 10%.	Pass			
		F – The cover of Bracken is below 20%.	Pass			
		G – There is an absence of invasive non-native plant species.	Pass			

Developed Land; Sealed Surface (DL1)	0	No Assessment Required	N/A	This area comprises all buildings and hardstanding infrastructure.	N/A
Introduced Shrub (IS1 to IS36)	0.86	No Assessment Required	N/A	<p>Numerous parcels of introduced shrub are situated across site, the majority of which are associated with the park that encompasses the northern section of the site, although scattered parcels are also present within the central and southern sections of the site.</p> <p>Species present within the park area include Heaven Bell <i>Abelia</i> sp., Daisy <i>Bellis</i> sp., Bottlebrush <i>Callistemon</i> sp., Pendulous Sedge <i>Carex pendula</i>, Mexican Orange Blossom <i>Choisya ternata</i>, Dogwood <i>Cornus</i> sp., Oleaster <i>Elaeagnus x ebbingei</i>, Spurge <i>Euphorbia</i> sp., Hebe <i>Hebe</i> sp., Common Sneezeweed <i>Helenium autumnale</i>, Lavender <i>Lavandula angustifolia</i>, Privet <i>Ligustrum</i> sp., Honeysuckle <i>Lonicera periclymenum</i>, Box-leaved Honeysuckle <i>Lonicera pileate</i>, New Zealand Flax <i>Phormium tenax</i>, Portuguese Laurel <i>Prunus lusitanica</i>, Lamb's-ear <i>Stachys byzantine</i> and Viburnum <i>Viburnum</i> sp., all surrounded by a layer of mulch.</p> <p>Small areas of introduced shrub associated with the car park towards the centre of the site are planted with Dogwood, Spurge, Persian Ivy <i>Hedera colchica</i>, Lavender, Cherry Laurel <i>Prunus laurocerasus</i>, Portuguese Laurel, Sage <i>Salvia officinalis</i>, Lamb's-ear and Viburnum, with further introduced shrub planting, to the east of the car park, dominated by Viburnum alongside an area with a higher proportion of native planting. The species assemblage of this area includes Pendulous Sedge, Dogwood <i>Cornus sanguinea</i>, Hazel <i>Corylus avellana</i>, Spurge, Bracken <i>Pteridium aquilinum</i> and Elder <i>Sambucus nigra</i>.</p>	0.86 units lost.

				<p>alongside aforementioned ornamental species found elsewhere on site. Butterfly Bush <i>Buddleja davidii</i>, a species listed under Category 3 of the London Invasive Species Initiative (LISI), was also identified within this area.</p> <p>Small parcels of well managed ornamental grass planting surrounded by mulch were also present in the southern corner of the site.</p> <p>All of this habitat is to be lost post-development.</p>	
Urban Tree	0.88	<p>Individual trees</p> <p>A – The tree is native (or at least 70% of trees within the block are native). Pass / Fail</p> <p>B – The tree canopy is predominantly continuous. Individual trees automatically pass this criterion. Pass</p> <p>C – The tree is mature (or above 50% of trees within the block are mature). Pass / Fail</p> <p>D – There are no signs of adverse anthropogenic impacts to tree health. There is no current regular pruning regime, with the trees retaining above 75% of their expected canopy. Fail</p> <p>E – Natural ecological niches are present. Fail</p> <p>F – More than 20% of the tree canopy is oversailing vegetation. Pass</p>	Moderate (3 / 6 condition criteria passed = Moderate)	<p>Eighteen small and one large ‘Moderate’ condition urban trees are present on-site. The small trees are scattered across the park area that forms the northern section of the site and include young native species such as Silver Birch <i>Betula pendula</i> and Wild Cherry <i>Prunus avium</i>. A large mature London Plane <i>Platanus x hispanica</i> tree is also present towards the southern corner of site.</p> <p>The London Plane is to be retained post-development, with the remainder of the trees to be lost to facilitate the development proposals.</p>	<p>0.29 units retained.</p> <p>0.59 units lost.</p>
Urban Tree	0.55	<p>Individual trees</p> <p>A – The tree is native (or at least 70% of trees within the block are native). Fail</p>	Poor	<p>An additional 26 small and two medium ‘Poor’ condition urban trees are also present on-site. All the small trees are again associated with the park area that forms the northern section of the site, however,</p>	<p>0.13 units retained.</p>

		B – The tree canopy is predominantly continuous. Individual trees automatically pass this criterion.	Pass	(2 / 6 condition criteria passed = Poor)	comprise of non-native species including Himalayan Birch <i>Betula utilis</i> var. <i>jacquemontii</i> , Tree Cotoneaster <i>Cotoneaster frigidus</i> , Sargent's Cherry <i>Prunus sargentii</i> and Tibetan Cherry <i>Prunus serrula</i> . A further two medium semi-mature London Plane trees are also present towards the southern corner of site. The two London Plane trees are to be retained under the development proposals, while all of the small trees are to be lost.	0.42 units lost.
		C – The tree is mature (or above 50% of trees within the block are mature).	Fail			
		D – There are no signs of adverse anthropogenic impacts to tree health. There is no current regular pruning regime, with the trees retaining above 75% of their expected canopy.	Fail			
		E – Natural ecological niches are present.	Fail			
		F – More than 20% of the tree canopy is oversailing vegetation.	Pass			
Hedgerows						
Baseline hedgerow (Ref)	Baseline Biodiversity Units	Condition Criteria / Pass or Fail	Condition	Ecological Features and Condition Notes		After Works
Non-native and Ornamental Hedgerow (H1)	0.01	No Assessment Required	N/A	Hedgerow H1, located within the southern corner of the site, is an ornamental hedgerow approximately 1m high and 0.5m wide. This hedgerow comprises a single ornamental species, namely Garden Privet <i>Ligustrum ovalifolium</i> . This hedgerow will be removed under the development proposals.		0.01 units lost.

Table 3.1 Summary of on-site Baseline Habitats and Hedgerows.

3.3. Post-Development

- 3.3.1. Table 3.2 below summarises the proposed established on-site post-development habitats and hedgerows as illustrated on Plan ECO3 and Appendix 1.
- 3.3.2. The Planting Strategy plan by HTA Design LLP details on-site areas of wildflower and species-rich amenity grassland seeding and mixed scrub, bioswale, introduced shrub, mixed woodland and urban tree planting, alongside the establishment of biodiverse green roofs and a series of ornamental hedgerows.
- 3.3.3. Overall, the proposed scheme would result in a combined net gain of 2.23 habitat units and 0.19 hedgerow units. This translates to a percentage change of 62.06% in habitat units and 1897.55% in hedgerow units from pre- to post-development. The exceptional percentage change in hedgerow units is due to the baseline only containing a very limited extent of ornamental hedgerow (0.01km), combined with numerous hedgerows (0.207km) to be established on-site post-development.
- 3.3.4. Proposed habitat and hedgerow conditions have been based against the Statutory Biodiversity Metric Condition Assessment criteria and are expected to be easily achieved through appropriate management.

Created Habitats			
Metric Habitat (Targeted Condition)	Biodiversity Units Delivered	Ecological Features	Delivering Net Gain
Grassland – Other Neutral Grassland (Moderate)	0.55	Several parcels of grassland utilising a species-rich wildflower seed mix will be seeded within the green corridor towards the western boundary of the site. This habitat will be subject to a relaxed management regime.	Given that a species-rich wildflower seed mix will be used, combined with a relaxed management scheme allowing for the establishment of a varied sward height, this habitat should be capable of attaining a 'Moderate' condition score within the metric.
Grassland – Other Neutral Grassland (Poor)	0.29	A species-rich low flowering sward seed mix will be used for some pockets of grassland associated with the north-west, centre and southern corner of the site. These areas are expected to be subject to a relatively greater degree of management to the wildflower grassland outlined above.	Although this habitat will be planted with a species-rich seed mix, due to the relatively high degree of management it is considered likely to be subject to, it is not expected to meet essential criterion A, requiring these parcels to be a good example of this habitat type, therefore limiting these areas to a 'Poor' condition score.
Heathland and Shrub – Mixed Scrub (Moderate)	0.08	New native shrub planting will occur towards the southern corner of the site.	New scrub planting will contain several native species which, when combined with suitable long-term management practices such as scrub edge management, small-scale thinning and the control of overly dominant species, should allow this habitat to reach 'Moderate' condition.
Urban – Biodiverse Green Roof (Moderate)	1.02	The roofs of the buildings within the northern section of the site will host biodiverse green roofs, heightening the provision of green infrastructure across site.	The biodiverse roofs will be seeded / laid with a species-rich grasslands turf mix that will provide opportunities for native fauna and should be managed to ensure the continued absence of any non-native or detrimental plant species. Green roofs will be of a varying depth and are expected to be able to reach a 'Moderate' condition.
Urban – Bioswale (Moderate)	0.24	Bioswales will be established within the north-western and central sections of the site and will be planted with a range of native grass and flowering species.	Bioswales will contain several non-native and native plant species of benefit wildlife and will be managed to ensure invasive or detrimental plant species do not establish. This habitat will offer new opportunities for invertebrates. Expected to reach at least 'Moderate' condition.
Urban – Developed Land; Sealed Surface (N/A)	0	All new buildings and associated hardstanding infrastructure.	N/A

Created Habitats			
Metric Habitat (Targeted Condition)	Biodiversity Units Delivered	Ecological Features	Delivering Net Gain
Urban – Introduced Shrub (N/A)	0.70	All non-native ornamental planting across site.	Areas of introduced shrub planting should contribute towards the provision of green infrastructure across site, with the inclusion of flowering species offering food resource for invertebrate species.
Woodland and Forest – Other Woodland; Mixed (Poor)	0.48	Planting will comprise six native tree species and associated native woodland understorey flora, including Bluebell <i>Hyacinthoides non-scripta</i> , a species listed on Schedule 8 of the Wildlife and Countryside Act 1981 (as amended).	Management should ensure the continued absence of any invasive species. Any trees that die, or are diseased or damaged, should be replanted with the same species to the same specification, with deadwood to be retained within the woodland parcels, when possible. Due to the urban setting, these parcels are considered unlikely to develop a complex structure or form and will therefore, in combination with the absence of any veteran trees, be expected to reach 'Poor' condition.
Individual Trees – Urban Tree (Moderate)	0.90	Seventy-two small native trees will be planted across site.	Given that these trees will be native, will over sail vegetation and will be either individual or, if grouped, will form a continuous canopy, this habitat is expected to reach a 'Moderate' condition score. As per the Biodiversity Metric guidance, none of the native trees within the parcels of woodland have been counted as individual trees.
Individual Trees – Urban Tree (Poor)	1.17	One hundred and three small non-native trees will be planted across site.	As these trees will over sail vegetation and will be either individual or, if grouped, will form a continuous canopy, this habitat should reach 'Poor' condition within the Biodiversity Metric. As per the Biodiversity Metric guidance, none of the native trees within the parcels of woodland have been counted as individual trees
Created Hedgerows			
Metric Hedgerow (Targeted Condition)	Biodiversity Units Delivered	Ecological Features	Delivering Net Gain
Non-Native and Ornamental Hedgerow (N/A)	0.22	All ornamental hedgerows associated with the newly constructed buildings towards the northern / north-eastern section of the site.	The ornamental hedgerows will contribute towards providing green infrastructure on-site in addition to increasing connectivity between habitats for faunal groups.

Table 3.2. Summary of established habitats and hedgerows on-site post-development.

4. EVALUATION

4.1. The Principles of Evaluation

Biodiversity Net Gain – Good Practice Principle for Development

- 4.1.1. CIRIA, CIEEM and IEMA have developed principles of good practice to achieve Biodiversity Net Gain. These principles provide a framework that helps improve the UK's biodiversity by contributing towards strategic priorities to conserve and enhance nature through sustainable development. There are ten principles in total and all principles must be applied together as one approach. The ten principles are set out below.
- 4.1.2. **Principle 1. Apply Mitigation Hierarchy.** Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision makers where possible, compensate for losses that cannot be avoided. If compensation for losses within the development footprint is not possible, or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
- 4.1.3. **Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere.** Avoid impacts on irreplaceable biodiversity; these impacts cannot be offset to achieve no net loss or net gain.
- 4.1.4. **Principle 3. Be inclusive and equitable.** Engage stakeholders early and involve them in designing, implementing, monitoring and evaluating the approach to net gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.
- 4.1.5. **Principle 4. Address risks.** Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.
- 4.1.6. **Principle 5. Make a measurable net gain contribution.** Achieve a measurable overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
- 4.1.7. **Principle 6. Achieve the best outcomes for biodiversity.** Achieve the best outcomes for biodiversity by using robust credible evidence and local knowledge to make clearly justified choices when:
- Delivering compensation that is ecologically equivalent in type, amount and condition and that accounts for the location and timing of biodiversity losses.
 - Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation.
 - Achieving net gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels.
 - Enhancing existing or creating new habitat.

- Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity.

4.1.8. **Principle 7. Be additional.** Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).

4.1.9. **Principle 8. Create a net gain legacy.** Ensure net gain generates long-term benefits by:

- Engaging stakeholders and jointly agreeing practical solutions that secure net gain in perpetuity.
- Planning for adaptive management and securing dedicated funding for long-term management.
- Designing net gain for biodiversity to be resilient to external factors, especially climate change.
- Mitigating risks from other land uses.
- Avoiding displacing harmful activities from one location to another.
- Supporting local-level management of net gain activities.

4.1.10. **Principle 9. Optimise sustainability.** Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.

4.1.11. **Principle 10. Be transparent.** Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

Lawton's Principle

4.1.12. Principles for enhancing England's wildlife sites were developed as part of the Lawton Review⁶. Across the UK, these principles can be used to design Biodiversity Net Gain activities to boost wildlife sites. They are:

- Improving the quality of wildlife sites;
- Increasing the size of the wildlife sites;
- Enhancing connections between, or joining up, wildlife sites;
- Creating new wildlife sites; and
- Reducing pressure on wildlife sites.

4.2. Post-Development Evaluation

4.2.1. The site's contribution to Biodiversity Net Gain has been assessed with due regard to the principles outlined and discussed above.

4.2.2. The landscaping contains a range of species-rich native habitats post-development such as other neutral grassland, mixed scrub, mixed woodland and urban trees, bolstered through the establishment of biodiverse green roof, bioswale, introduced shrub and ornamental hedgerow habitat, strengthening the floristic diversity and the provision of green infrastructure across site.

⁶ Department for Environment, Food and Rural Affairs (2010). *Making Space for Nature: A Review of England's Wildlife Sites*, DEFRA.

- 4.2.3. Due to these provisions, in combination with a relatively low baseline value, the current iteration of the landscaping plan succeeds in attaining a combined on-site net gain of 2.23 habitat units and 0.19 hedgerow units from pre- to post-development, equivalent to percentage changes of 62.06% and 1897.55% respectively.
- 4.2.4. Due to these net gains, the development also succeeds in meeting all trading rules for both habitats and hedgerows under the current proposals.
- 4.2.5. The landscaping will succeed in enhancing the green infrastructure provision of the site and maintain and enhance connectivity throughout site, providing elevated opportunities for foraging birds, bats and Hedgehogs, in addition to improvements in nesting opportunities for birds, once trees mature. An increase in floristic diversity of the site will also heighten invertebrate suitability.
- 4.2.6. The net changes delivered by the development proposals are detailed within Table 4.1 below.

On-Site Baseline	Habitat Units	3.60
	Hedgerow Units	0.01
	Watercourse Units	0
On-Site Post-intervention	Habitat Units	5.83
	Hedgerow Units	0.20
	Watercourse Units	0
Total Net Unit Change	Habitat Units	2.23
	Hedgerow Units	0.19
	Watercourse Units	0
Total Net Change (%)	Habitat Units	62.06%
	Hedgerow Units	1897.55%
	Watercourse Units	0%

Table 4.1. Summary of Biodiversity Net Gain results.

5. PLANNING POLICY CONTEXT

- 5.1. The planning policy framework that relates to Biodiversity Net Gain is issued nationally through the National Planning Policy Framework (NPPF), regionally through the London Plan and locally through the planning policies of the Royal Borough of Greenwich.

5.2. National Policy

National Planning Policy Framework (December 2023)

- 5.2.1. Guidance on national policy for Biodiversity Net Gain is provided by the NPPF, published in March 2012 and revised on 24 July 2018, 19 February 2019, 20 July 2021, 5 September 2023 and again on 19 December 2023. The following sections of the policy relate to Biodiversity Net Gain.
- 5.2.2. Paragraph 180(d) states that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current future pressures.
- 5.2.3. Paragraph 185(b) states that to protect and enhance biodiversity and geodiversity, plans should 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.
- 5.2.4. Paragraph 186(d) states that when determining planning application, local planning authorities should apply the following principle: 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 encouraged, especially where this can secure measurable net gains for biodiversity.

5.3. Regional Policy

The London Plan (March 2021)

- 5.3.1. The new London Plan was published in March 2021. This document sets out a framework for how London will develop over the next 20-25 years.
- 5.3.2. The policy areas within the London Plan are formed by six Good Growth objectives. These policies are: GG1 Building strong and inclusive communities; GG2 Making the best use of land; GG3 Creating a healthy city; GG4 Delivering the homes Londoners need; GG5 Growing a good economy; and GG6 Increasing efficiency and resilience.
- 5.3.3. Of these objectives, GG2 is concerned with protecting and enhancing London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces. It also seeks to promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.

- 5.3.4. Five new policies have been introduced specifically relating to green infrastructure and the natural environment.
- 5.3.5. **Policy G1 Green Infrastructure** states that green features in the built environment, such as street trees and green roofs, should be planned, designed and managed in an integrated way to achieve multiple benefits.
- 5.3.6. **Policy G2 London's Green Belt** states that the Green Belt should be protected from inappropriate development.
- 5.3.7. **Policy G5 Urban Greening** requires major developments to incorporate measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 5.3.8. **Policy G6 Biodiversity and Access to Nature** requires the protection of SINC's. Boroughs should also support the protection and conservation of priority species and habitats that sit outside of the SINC network and promote opportunities for enhancing them using Biodiversity Action Plans.
- 5.3.9. **Policy G7 Trees and Woodlands** is concerned with the protection of these features, including 'veteran' trees and ancient woodland not already in a protected site and identifying opportunities for tree planting in strategic locations. It encourages the retention of existing trees, wherever possible, and the planting of new trees as part of development.

5.4. Local Policy

- 5.4.1. The Royal Borough of Greenwich's Local Development Framework consists of the Core Strategy, together with supplementary and procedural documents. A new Local Plan that will set out the Council's vision until 2036 is currently undergoing consultation.

Royal Greenwich Local Plan: Core Strategy with Detailed Policies (July 2014)

- 5.4.2. The Royal Greenwich Local Plan: Core Strategy with Detailed Policies document was adopted in July 2014. Although this document does not specifically mention the requirement of the completion of the Biodiversity Metric or any targeted net gain, it does outline the need for developments to enhance biodiversity and natural features. Policies of particular relevance to nature conservation issues are detailed below.
- 5.4.3. On the policies map, the site, either in whole or in part, is located within a Strategic Development Location – Policy H1, Woolwich Town Centre – Policy TC2, a Conservation Area – Policy DH(h) and the Thames Policy Area – DH(k). The site is also in a Wildlife Deficiency Area – Policy OS(e).
- 5.4.4. **Policy H1 – New Housing.** The site is situated within Woolwich town centre, one of Royal Greenwich's six Strategic Development Locations. This policy outlines that these locations will be specifically targeted for growth, with new housing expected to be developed.
- 5.4.5. **Policy TC2 – Woolwich Town Centre.** This policy aims to develop Woolwich as a Metropolitan Centre through the construction of new retail

and office development, improved transport links and facilitating leisure, cultural and tourism uses.

- 5.4.6. **Policy DH(h) – Conservation Areas.** This policy outlines that development proposals must give particular attention to preserving or enhancing the character and / or appearance of Conservation Areas. This includes developments in the vicinity of these areas that would present visual impacts. Buildings within Conservation Areas that are considered to contribute positively will have their demolition resisted and developments that would negatively impact Conservation Areas will be controlled.
- 5.4.7. **Policy DH(k) – Thames Policy Area.** This policy details the actions which will be taken to protect and enhance the River Thames and its foreshore for wildlife and nature conservation.
- 5.4.8. **Policy OS4 – Biodiversity.** This policy states that Royal Greenwich’s rich biodiversity will be protected, restored and enhanced. This includes the protection of designated sites including SSSIs, SINCs and LNRs.
- 5.4.9. **Policy OS(e) – Wildlife Deficiency Areas.** This policy seeks to improve areas of wildlife deficiency by securing provision of areas to be managed as wildlife habitats.
- 5.4.10. **Policy OS(f) – Ecological Factors.** This policy states that development proposals will be expected to take account of ecological factors. This includes considering the biodiversity of the site and surrounding area, specifically regarding protected species. On-site trees should be surveyed and development decisions will be based on the requirements to protect trees and achieve appropriate replacement where removal is agreed.
- 5.4.11. Landscaping schemes should also include environmentally appropriate planting using local native species. Development proposals must consider *“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, hedgerows and other features where these will contribute to biodiversity.”* Additionally, they must also consider *“the protection, enhancement and restoration of natural river features and corridors by appropriate landscaping and design.”*
- 5.4.12. **Policy OS(g) – Green and River Corridors.** This policy seeks to protect and enhance Royal Greenwich’s rivers, canals and lakes.
- 5.5. **Environment Act 2021**
- 5.5.1. The Environment Act 2021, fully adopted on 12 February 2024, has established a legal requirement for all developments to ensure that a minimum 10% net gain in Biodiversity is delivered. This said, current guidance from the Department for Environment, Food, and Rural Affairs (DEFRA) is that the approval of reserved matters for outline planning permissions are not within the scope of Biodiversity Net Gain, as they are not a grant of planning permission.

6. SUMMARY AND CONCLUSIONS

- 6.1. Ecology Solutions was commissioned by Berkeley Homes (East Thames) Limited in December 2022 to undertake a Biodiversity Net Gain assessment for the Ropeyards, Royal Arsenal Riverside, Plots D & K (Buildings D1, D2, D3, D4, D5 and K3 K4, K5).
- 6.2. The site is seeking to progress with a reserved matters application pursuant to the outline consent granted for 'The Waterfront Masterplan' which comprises a residential led development (outline planning permissions: 16/3025/MA). In addition to the new housing and commercial space, the development will provide new public realm.
- 6.3. The northern section of the site comprises an open park formed from modified grassland and introduced shrub habitat, containing numerous scattered urban trees, intersected and surrounded by a series of footpaths and access roads. The central and southern sections of the site are dominated by developed land in the form of buildings, a car park and associated infrastructure, interspaced by small areas of modified grassland and introduced scrub, with an ornamental hedgerow and three urban trees also present in the southern corner of the site.
- 6.4. Overall, when assessed against the Statutory Biodiversity Metric, the current iteration of the Planting Strategy plan succeeds in delivering a net gain in habitat units of **62.06%** (2.23 units), due to the provision of relatively valuable habitats, including other neutral grassland, mixed scrub, mixed woodland and urban trees, combined with the baseline being formed from relatively low value habitat. Hedgerow units would also see a substantial net gain of **1897.55%** (0.19 units), with this again due to the extent of the provision of new hedgerow planting in combination with the small extent of ornamental hedgerow present pre-development. Additionally, all trading rules for habitats and hedgerows are met under the proposals.
- 6.5. The retained and created habitats will provide increased green infrastructure and connectivity across site and offer new opportunities for faunal groups including bats, birds, Hedgehogs and invertebrates.
- 6.6. Given this, it is considered that the development has illustrated that it would be compliant with all relevant policy and legislation.

PLANS

PLAN ECO1

Site Location



KEY:
 SITE BOUNDARY



Cokenach Estate
 Barkway | Royston
 Hertfordshire | SG8 8DL
 +44(0)1763 848084
 east@ecologysolutions.co.uk
 ecologysolutions.co.uk

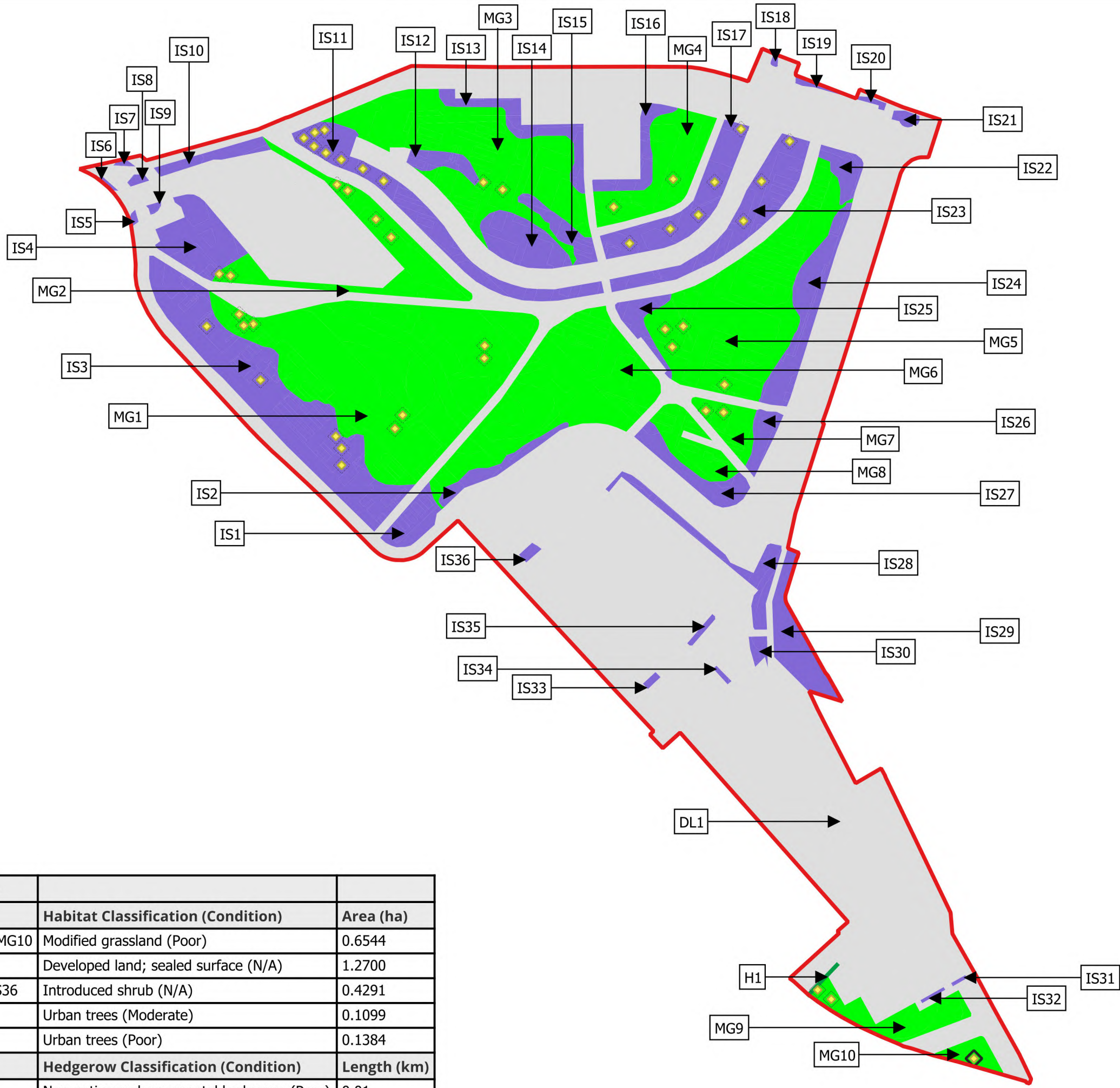
10995: THE ROPEYARDS,
 ROYAL ARSENAL RIVERSIDE, PLOTS D & K
 (BUILDINGS D1, D2, D3, D4, D5 AND K3, K4, K5)

PLAN ECO1: SITE LOCATION

Rev: A
 Mar 2024

PLAN ECO2

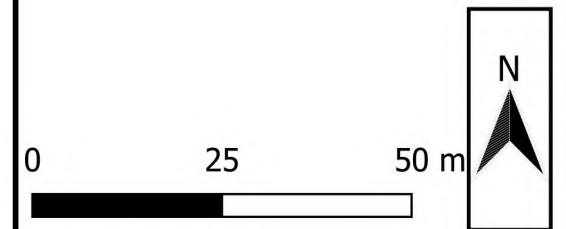
Pre-development Habitats



KEY:

- SITE BOUNDARY
- HABITATS**
- MODIFIED GRASSLAND
- INTRODUCED SHRUB
- DEVELOPED LAND; SEALED SURFACE
- HEDGEROWS**
- NON-NATIVE AND ORNAMENTAL HEDGEROW
- INDIVIDUAL TREES**
- LARGE URBAN TREE
- MEDIUM URBAN TREE
- SMALL URBAN TREE

On-site		
Label	Habitat Classification (Condition)	Area (ha)
MG1 to MG10	Modified grassland (Poor)	0.6544
DL1	Developed land; sealed surface (N/A)	1.2700
IS1 to IS36	Introduced shrub (N/A)	0.4291
	Urban trees (Moderate)	0.1099
	Urban trees (Poor)	0.1384
Label	Hedgerow Classification (Condition)	Length (km)
H1	Non-native and ornamental hedgerow (Poor)	0.01



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ROYAL ARSENAL RIVERSIDE, PLOTS D & K
(BUILDINGS D1, D2, D3, D4, D5 AND K3 K4, K5)

**PLAN ECO2:
PRE-DEVELOPMENT
HABITATS**

Rev: B
Mar 2024

PLAN ECO3

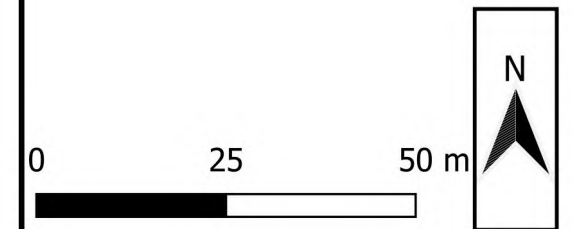
Post-development Habitats



KEY:

- SITE BOUNDARY
- HABITATS**
- OTHER NEUTRAL GRASSLAND (MODERATE)
- OTHER NEUTRAL GRASSLAND (POOR)
- MIXED SCRUB
- BIODIVERSE GREEN ROOF
- BIOSWALE
- DEVELOPED LAND; SEALED SURFACE
- INTRODUCED SHRUB
- OTHER WOODLAND; MIXED
- HEDGEROWS**
- NON-NATIVE AND ORNAMENTAL HEDGEROW
- INDIVIDUAL TREE**
- SMALL URBAN TREE
- LARGE URBAN TREE
- MEDIUM URBAN TREE

On-site		
Habitat Classification (Condition)	Created / Retained / Enhanced	Area (ha)
Other neutral grassland (Moderate)	Created	0.0815
Other neutral grassland (Poor)	Created	0.0766
Mixed scrub (Moderate)	Created	0.0115
Biodiverse green roof (Moderate)	Created	0.2281
Bioswale (Moderate)	Created	0.0909
Developed land; sealed surface (N/A)	Created	1.3611
Introduced shrub (NA)	Created	0.3618
Other woodland; mixed (Poor)	Created	0.1420
Urban tree (Moderate)	Created	0.2931
Urban tree (Poor)	Created	0.4194
Urban tree (Moderate)	Retained	0.0366
Urban tree (Poor)	Retained	0.0326
Hedgerow Classification (Condition)	Created / Retained / Enhanced	Length (km)
Non-native and ornamental hedgerow (Poor)	Created	0.207



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(BUILDINGS D1, D2, D3, D4, D5 AND K3 K4, K5)

PLAN ECO3:
POST-DEVELOPMENT
HABITATS

Rev: B
Mar 2024

APPENDICES

APPENDIX 1

Planting Strategy

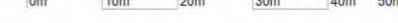


- Application Boundary
- - - Contour line at intervals of 500mm
- KEY GROUND FLOOR :**
- Woodland understory planting
- Shrub and perennial planting
- Native shrub mix
- Wildflower meadow planting
- Species rich amenity lawn
- Swale planting
- Hedge planting
- Tree planting
- Existing Trees
- KEY PODIUM :**
- Groundcover planting
- Ornamental grass and herbaceous planting
- Shrub planting
- Hedge planting
- Tree planting
- KEY ROOF :**
- Biodiverse roof

revision	date	issued	description
P00	March 2024	MNA	For Planning

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Planting Strategy Plan

Berkeley Homes
Royal Arsenal Riverside

For Planning

Z429-HTA01-STW-ZZ-DR-L-880-120
number

1:500 @ A1
scale

75 Wallis Rd, London E9 5LN
020 7485 8555 www.hta.co.uk

P00
revision

BKH
job reference

SML
drawn





- Application Boundary
- - - Contour line at intervals of 500mm
- Parkland Trees
- Parkland & Play Trees (north)
- Parkland & Play Trees (south)
- Street Trees
- Small Multi Stem Trees
- Ornamental Podium Trees
- Existing Trees
- Planting Area
- Hedge planting

revision	date	issued	description
P00	March 2024	MNA	For Planning

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0m 10m 20m 30m 40m 50m



Tree Planting Strategy Plan

Berkeley Homes
Royal Arsenal Riverside
For Planning

Z429-HTA01-STW-ZZ-DR-L-880-130
number

1:500 @ A1
scale

BKH
job
reference

75 Wallis Rd, London E9 5LN
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P00
revision

SML
drawn



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