

Emily Leslie  
Greater London Authority  
City Hall  
Kamal Chunchie Way  
London  
E16 1ZE

01 November 2023

Our ref: 551566mjh21Jul23LV1\_BIA\_UGF\_Nov23\_Update

Dear Emily,

### **ABERFELDY VILLAGE MASTERPLAN - ECOLOGY ADDENDUM NOV 23**

This Ecology addendum is an update to the ecology reports, as listed below, that were submitted to the Council in support of the hybrid planning application.

- Habitat Regulation Assessment Screening Note (Report Ref: 551566MJH17Nov20\_HRA\_Screening\_Note\_V3)
- Preliminary Ecological Appraisal (Report Ref: 551566dp11Oct21FV05\_PEA)
- Bat Survey (Report Ref: 551566dp11Oct21FV03\_Bats)
- Biodiversity Impact Assessment (Report ref: 551566dp12Oct21FV03\_BIA)
- Urban Greening Factor Assessment (Report ref: 551566dp12Oct21FV05\_UGF)
- Ecology Addendums (Report Ref: 551566mjh08Mar22LV1\_Jollys\_Green & 551566mjh23Dec22LV1\_BIA\_UGF\_Dec22\_Update)<sup>1</sup>

This document is an addendum to the above documents that has been submitted in support of the Hybrid Application (LBTH Ref: PA/21/02377/A1 and GLA Ref: 2023/0300/S3).

Following a resolution to refuse planning permission by the London Borough of Tower Hamlets (LBTH) Strategic Development Committee (SDC) in February 2023, and the subsequent direction that the Mayor of London will act as the local planning authority for the purposes of

---

<sup>1</sup> Ecology Addendum (Report Ref: 551566mjh08Mar22LV1\_Jollys\_Green) includes the Preliminary Ecological Appraisal of Jolly's Green as well as the impact that the inclusion of Jolly's Green has on the BNG and UGF Assessments. The PEA element remains valid. The BNG and UGF elements of the addendum have been superseded by the December 2022 Addendum and then again by this November 23 Addendum.

determining the Hybrid Application, the design of the scheme has been amended to accommodate second staircases in all buildings over 18m in height.

For the sake of completeness only it should be noted that this Addendum follows the previously submitted addendums to above documents, which considered iterative changes to the Masterplan prior to its consideration by the LBTH SDC in February 2023. In summary these previously assessed amendments comprised: the incorporation of Jolly's Green within the red line boundary, the removal of the previously proposed Block A3 and associated increase in open space and play space, an increase the number of affordable rent family homes being delivered as part of the development, and the inclusion of second staircases in Plots F & I.

In addition to the above changes, landscape changes to achieve a UGF of 0.4, as required by London Plan Policy G5 (see Appendix A), have also been made.

The purpose of this addendum is to assess the Development in terms of Biodiversity Net Gain and Urban Greening Factor Assessments, taking into consideration the cumulative updates that have been made since the original submission of the Hybrid Application, including those previously considered in the now superseded addendum, dated 08 March 2022 and 23 December 2022.

The impacts of the changes from the addition of a secondary staircase to all buildings 18m plus does not result in any changes to the previously submitted reports, which are listed at the start of this letter. This addendum deals with the impacts of the additional landscaping now proposed to achieve a UGF of 0.4, in line with London Policy G5.

The new development description is as follows: Hybrid application seeking detailed planning permission for Phase A and Outline planning permission for future phases, comprising:

Outline planning permission (all matters reserved) for the demolition of all existing structures and redevelopment to include a number of buildings (up to 100m AOD) and up to 140,591 (GEA) of floorspace comprising the following mix of uses: Residential (Class C3); Retail, workspace, food and drink uses (Class E); Car and cycle parking; Formation of new pedestrian route through the conversion and repurposing of the Abbott Road vehicular underpass for pedestrians and cyclists connecting to Jolly's Green; Landscaping including open spaces and public realm; and New means of access, associated infrastructure and highway works.

In Full, for residential (Class C3), retail, food and drink uses and a temporary marketing suite (Class E and Sui Generis), together with access, car and cycle parking, associated landscaping and new public realm, and open space. This application is accompanied by an Environmental Statement.

Further information is set out within the accompanying Covering Letter (as prepared by DP9 Ltd, dated November 2023) and the updated Planning Statement (as prepared by DP9 Ltd, dated November 2023).

## BIODIVERSITY IMPACT ASSESSMENT

Increased landscaping has been proposed since the previous application. These increased landscaping changes have been made to achieve a UGF of 0.4, to be in line with London Plan Policy G5. These changes also impact upon the BNG calculation.

The key changes, which are detailed within the UGF Improvement Sketch Book in Appendix B of this addendum letter, comprised:

- Planting typology change from flower rich perennial (introduced shrub in BNG) to semi natural woodland mix (other broadleaved woodland in BNG) in two locations;
- Addition of native climber green walls (ground based green wall in BNG); and
- Planting typology change from amenity grass and flower rich perennial (modified grassland and introduced shrub in BNG) to semi-natural meadow (other neutral grassland in BNG) in two locations.

The updated BIA shows a Biodiversity Net Gain across the whole masterplan of **30.47%**. This is an increase on the previous net gain of **21.11%**.

An updated Biodiversity Metric 3.0 has been submitted alongside this addendum letter.

Although new versions of the Biodiversity Metric have been released since the previous submission, as Metric 3.0 had previously been used and has influenced the design and landscaping specification, for consistency purposes, Metric 3.0 has continued to be used. This is considered to be an acceptable approach.

## Discussion and Conclusion

The changes to the landscape proposals to achieve a UGF of 0.4 has meant that the BNG is now **30.47%** and all trading rules met. Therefore, the proposals will exceed the legislative and planning policy requirements with regards to BNG as detailed within Appendix A.

## URBAN GREENING FACTOR

To meet a 0.4 UGF changes were made to the previously proposed landscaping plan.

The key changes, which are detailed within the UGF Improvement Sketch Book in Appendix B of this addendum letter, comprised:

- Planting typology change from flower rich perennial to semi natural woodland mix in two locations;
- Addition of native climber green walls; and
- Planting typology change from amenity grass and flower rich perennial to semi-natural meadow in two locations.

These changes to the landscaping plan have been included within an updated UGF Assessment, see Appendix B, has resulted in the UGF increasing from **0.37** to **0.4**.

### Discussion and Conclusion

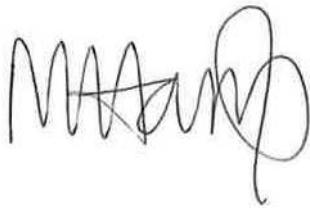
The changes made to the landscaping plan now delivers a UGF of **0.4**. A UGF of **0.4** is in line with policy requirements set out within the London Plan, as set out further in Appendix A.

### OVERALL CONCLUSION

The changes from the addition of a secondary staircase to all buildings 18m plus does not result in any changes to the previously submitted reports, which are listed at the start of this letter.

The changes made to the landscaping plan have increased the BNG percentage from **21.11%** to **30.47%** BNG with all trading rules being satisfied. The changes have also resulted in the UGF increasing from **0.37** to **0.4**. Therefore, with these changes, the masterplan will comply with all relevant legislation and planning policy with regards to BNG and UGF.

Yours sincerely



**Mike Harris**

**Director**

**T: 020 3544 4000**

**E: [mike.harris@greengage-env.com](mailto:mike.harris@greengage-env.com)**

**For and on behalf of Greengage Environmental Ltd**



## APPENDIX A LEGISLATION AND PLANNING POLICY

### A.1 LEGISLATION

#### The Environment Act, 2021<sup>1</sup>

The Environment Act, 2021 will mandate the requirement for new development in England to deliver a minimum 10% biodiversity net gain (BNG), as measured by the agreed metric (the current relevant version being the Natural England Metric 3.0), secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of offsite biodiversity unit offsets, or the purchase of biodiversity credits.

The Act introduces the condition that no development may begin unless a biodiversity net gain plan has been submitted and approved by the local planning authority (LPA).

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

### A.2 POLICY

#### National

#### National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) 2021<sup>2</sup> sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost..

#### The London Plan<sup>3</sup>

#### *Policy G1 Green infrastructure*

1. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.

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

### *Policy G5 Urban greening*

- 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.

### *Policy G6 Biodiversity and access to nature*

- A. Sites of Importance for Nature Conservation (SINCs) should be protected.
- B. Boroughs, in developing Development Plans, should:
  1. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
  2. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
  3. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans

4. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
  5. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
- C. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
1. avoid damaging the significant ecological features of the site
  2. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
  3. deliver off-site compensation of better biodiversity value.
- D. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- E. Proposals which reduce deficiencies in access to nature should be considered positively.

### *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 quality are retained [Category A and B]. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

### A.3 LOCAL

#### Tower Hamlets Local Plan 2031 (adopted Jan 2020)

The Tower Hamlets Local Plan sets out how the LPA will manage growth in Tower Hamlets and ensure the benefits are shared with all the residents over the next 15 years.

#### Policy S.ES1 Protecting and enhancing our environment

This policy states:

1. Proposals will be supported which minimise the use of natural resources and work proactively to protect and enhance the quality of the natural environment, through:
  - a. reducing the areas of sub-standard air quality in the borough and contributing towards delivering the objectives of the latest Tower Hamlets Air Quality Action Plan
  - b. protecting and enhancing biodiversity, with the aim of meeting the objectives of the latest Tower Hamlets Local Biodiversity Action Plan and Thames River Basin Management Plan and improving opportunities to experience nature, in particular in deficient areas
  - c. using the sequential and exceptions tests to direct development away from high flood risk areas and reduce flood risk in the borough
  - d. reducing water use
  - e. following the energy hierarchy: be lean, be clean and be green
  - f. maximising climate change adaptation measures, and
  - g. improving water and land quality and mitigating the adverse effects of contaminated land on human health.

#### Policy D.ES3 Urban greening and biodiversity

1. Development is required to protect and enhance biodiversity, through:
  - a. maximising the provision of 'living building' elements
  - b. retaining existing habitats and features of biodiversity value or, if this is not possible, replacing them within the development, as well as incorporating additional measures to enhance biodiversity, proportionate to the development proposed, and
  - c. protecting and increasing the provision of trees, through:
    - i. protecting all trees, including street trees
    - ii. incorporating native trees, wherever possible
    - iii. providing replacement trees, including street trees, where the loss of or impact on trees in a development is considered acceptable.

2. Major development is required to submit an ecology assessment demonstrating biodiversity enhancements that contribute to the objectives of the latest Tower Hamlets Local Biodiversity Action Plan and the Thames River Basin Management Plan.
3. Planting and landscaping around developments must not include 'potentially invasive non-native species'. Invasive non-native species listed in Schedule 9 of the Wildlife and Countryside Act must be controlled, and eradicated where possible, as part of redevelopment.
4. Development must not negatively impact on any designated European site such as Special Protection Areas, Special Areas of Conservation or Ramsar sites. Developments which might have the potential to adversely impact a Special Protection Area or Special Area of Conservation outside the borough will be required to submit a Habitat Regulations Assessment.
5. Developments which affect a Site of Importance for Nature Conservation, or significantly harm the population or conservation status of a protected or priority species, are required to be managed in accordance with the following hierarchy:
  - a. Adverse impacts to the biodiversity interest should be avoided.
  - b. Where avoidance is not possible, proposals must minimise and mitigate the impact to the biodiversity interest.
  - c. As a last resort for exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, appropriate compensation will be sought.
  - d. Where appropriate compensation is not possible, planning permission will be refused

















**APPENDIX B UGF SKETCHBOOK PREPARED BY LDA DESIGN**

# ABERFELDY UGF UPDATE

JULY 2023



# URBAN GREENING FACTOR - REVISED TO 0.400

Surface Cover Type	Area (sqm)	Factor	Area x Factor
	91,700		
 Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site	11,609	1	11,609
 Wetland or open water (semi-natural; not chlorinated) maintained or established on site	0	1	0
 Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm	6,079	0.8	4,863.2
 Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	14,112	0.8	11,289.6
 Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) - meets the requirements of GRO Code 2014	73	0.7	51.1
 Flower-rich perennial planting	2,624	0.7	1838.8
 Rain gardens and other vegetated sustainable drainage elements	740	0.7	518
 Hedges (line of mature shrubs one or two shrubs wide)	383	0.6	229.8
 Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree	6,417	0.6	3,850.2
 Green Wall - modular system or climbers rooted in soil	1,833	0.6	1099.8
 Groundcover planting	0	0.5	0
 Amenity grassland (species-poor, regularly mown lawn)	3,383	0.4	1,353.2
 Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014	0	0.3	0
 Water features (chlorinated) or unplanted detention basins	0	0.2	0
 Permeable paving	0	0.1	0
 Sealed structures (e.g. concrete, asphalt, waterproofing, stone)	46,124	0	0
<b>Total</b>	<b>36,700.7</b>		
<b>UGF ENTIRE SITE BOUNDARY</b>			<b>0.400225</b>





# URBAN GREENING FACTOR - PREVIOUS PLAN VS REVISED

## PREVIOUS UGF PLAN - 0.37



Total	34,559.3
UGF ENTIRE SITE BOUNDARY	0.37687350

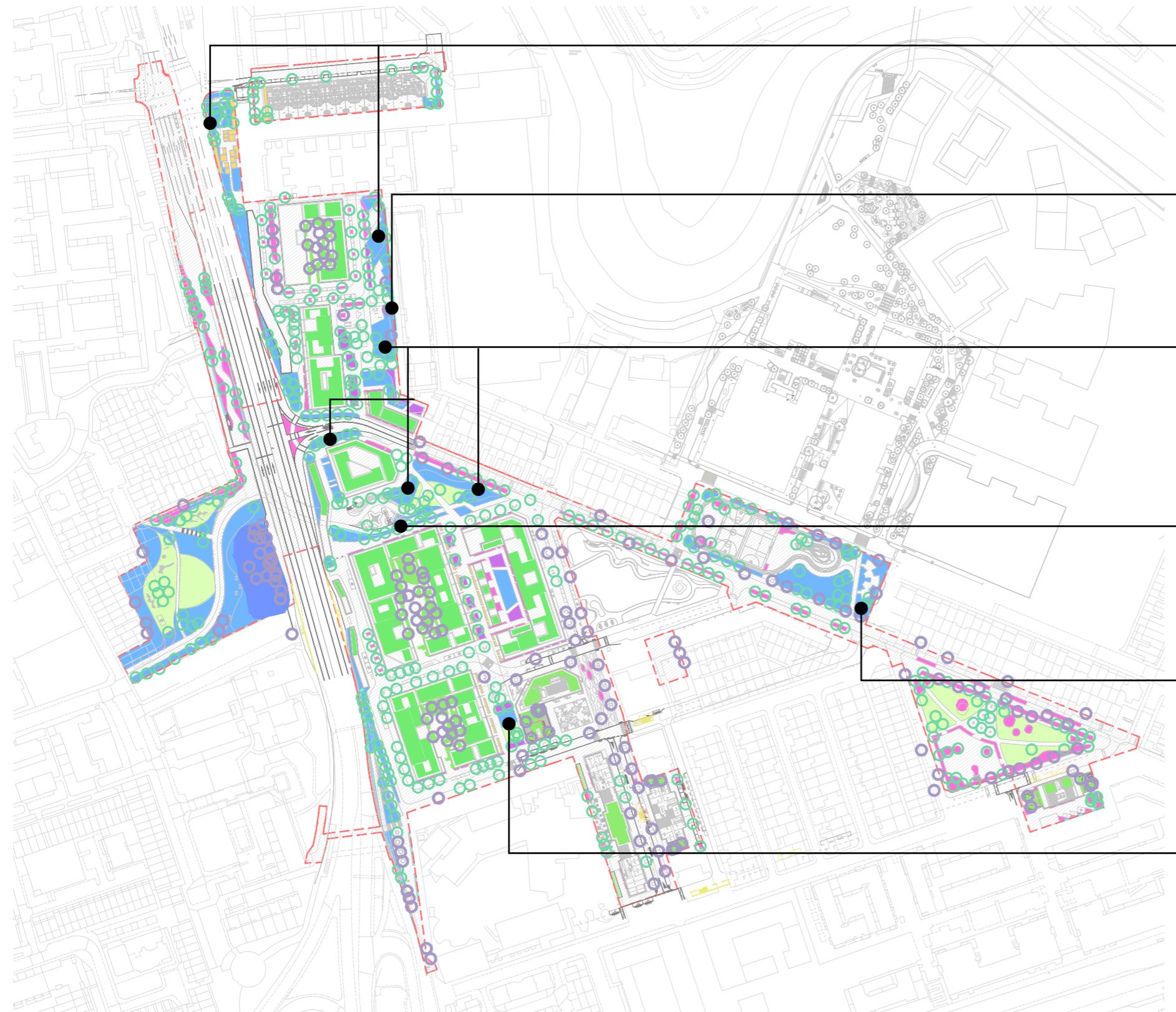
## REVISED UGF PLAN - 0.40



Total	36,700.7
UGF ENTIRE SITE BOUNDARY	0.400225



# URBAN GREENING FACTOR - AMENDMENTS



Planting typology change to semi natural woodland vegetation along A12 boundary & Nairn Park community gardens (previously flower rich perennial)  
UGF increase: 0.019



Addition of a green wall to Nairn park  
UGF increase: 0.0023



Planting typology change to semi natural meadow in Nairn Park & Highland Place (previously amenity grass/flower perennial)  
UGF increase: 0.0108



Addition of a green wall Highland Place  
UGF increase: 0.0023



Planting typology change to semi natural woodland vegetation in Leven Road Open Space perimeter planting (previously flower rich perennial)  
UGF increase: 0.0021



Planting typology change to semi natural meadow in Culloden Sq (previously amenity grass)  
UGF increase: 0.0011



















Total UGF Increase:  
UGF increase: 0.03767





# AMENDED UGF - HIGHWAYS NOT INCLUDED

The plan below demonstrates the UGF if the highways lands are not included within the area for the redline boundary. The highway area below is the minimum requirement for the area and the design team have no opportunity to enhance or increase greening within this area. If this area is removed from the overall boundary, the Urban Green Factor is 0.48.

Surface Cover Type	Area (sqm)	Factor	Area x Factor
	91,700		
 Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site	11,609	1	11,609
 Wetland or open water (semi-natural; not chlorinated) maintained or established on site	0	1	0
 Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm	6,079	0.8	4,863.2
 Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	14,112	0.8	11,289.6
 Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) - meets the requirements of GRO Code 2014	73	0.7	51.1
 Flower-rich perennial planting	2,624	0.7	1838.8
 Rain gardens and other vegetated sustainable drainage elements	740	0.7	518
 Hedges (line of mature shrubs one or two shrubs wide)	383	0.6	229.8
 Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree	6,417	0.6	3,850.2
 Green Wall - modular system or climbers rooted in soil	1,833	0.6	1099.8
 Groundcover planting	0	0.5	0
 Amenity grassland (species-poor, regularly mown lawn)	3,383	0.4	1,353.2
 Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014	0	0.3	0
 Water features (chlorinated) or unplanted detention basins	0	0.2	0
 Permeable paving	0	0.1	0
 Sealed structures (e.g. concrete, asphalt, waterproofing, stone)	46,124	0	0
<b>Total</b>			<b>36,700.7</b>
			<b>UGF ENTIRE SITE BOUNDARY 0.400225</b>
			<b>UGF WITH ROADS REMOVED 0.484843</b>

 91,700 MSQ	 14,145.5MSQ	→ =75,696.5MSQ
SITE BOUNDARY INCLUDING ROADS	ROAD AREAS	SITE BOUNDARY NOT INCLUDING ROAD



## REFERENCES

<sup>1</sup> GOV.UK. (2021). *Environment Act 2021*. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

<sup>2</sup> GOV.UK. (2021). *National Planning Policy Framework*. [online] Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework>

<sup>3</sup> Greater London Authority (2021) *The London Plan: The Spatial Development Strategy for Greater London* (GLA)

## REFERENCES

<sup>1</sup> GOV.UK. (2021). *Environment Act 2021*. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

<sup>2</sup> GOV.UK. (2021). *National Planning Policy Framework*. [online] Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework>

<sup>3</sup> Greater London Authority (2021) *The London Plan: The Spatial Development Strategy for Greater London* (GLA)