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Client: London Borough of Lambeth
Project: Brockwell Park
Report: Biodiversity Net Gain Assessment - Baseline

QUALITY ASSURANCE

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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd (Greengage) was commissioned by London Borough of Lambeth to undertake a baseline Biodiversity Net Gain Assessment (BNGA), using the Statutory Biodiversity Metric (SBM), for an area of land in Brockwell Park, hereafter referred to as 'the site'.

This document is a report of the baseline BNGA and has been produced to support the discharge of conditions relating to planning application (reference: 25/00693/RG3). In particular Condition 16, which states:

"A Biodiversity Net Gain assessment and metric calculation shall be submitted to and approved by the local planning authority in writing prior to the 11/05/2025."

The BNGA aims to quantify the predicted change in biodiversity value of the site in light of the proposals to assess compliance against national and local planning policy and against the BNG mandate set out in the Environment Act 2021, which states that all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% biodiversity net gain.

The site extends to 16.68 hectares (ha) and comprises modified grassland, individual trees, hedgerows, buildings and sealed surfaces, as identified from a site walkover undertaken on 15th May 2025, alongside data received from a desk study and the Preliminary Ecological Appraisal (PEA).³

The locations, extents, conditions and habitat parcel reference numbers of the pre-development (baseline) habitats are mapped at Appendix A. The habitat values are split into three categories: area-based 'Habitat Units' (HU), linear-based 'Hedgerow Units' (HeU) and aquatic linear-based 'Watercourse Units' (WU) respectively, where applicable to the site.

The assessment has calculated baseline BU of the site, related to the 2025 event.

The assessment has identified that the 2025 baseline BU value is 99.20HU and 0.38HeU.

Therefore, we recommend that a 10% gain is sought against the post-event permanent impact, rather than the baseline recorded in May 2025.

The Environment Act requires that any permanent degradation to habitats at a site be considered as lost. Therefore, it is recommended that an updated habitat and condition assessment is undertaken following the event, to understand the extent of damage to habitats, particularly the grassland post-event. It is acknowledged this is a unique situation which is not neatly covered by the requirements of the Environment Act or the principles of BNG. We recommend that a reasonable approach would be to consider the area of habitat within the event red line that is subject to changes in habitat typology or condition following the event. We would then consider that these areas will likely take up to 3 months to recover to the pre disturbance condition (albeit monitoring should be undertaken to validate this assumption). These areas would be considered de facto permanently degraded in value by 25% (should the 3 month recovery period be validated). This would mean that 25% of the unit value for the disturbed areas would be considered as lost permanently and used to inform the offset requirement. Any created, retained and enhanced habitats should be subject to an HMMP to cover a period of no less than 30

years. This should be taken to compensate for the impact of future events as well, so long as habitats are retained and appropriately protected to the status they were observed in 2025.

2.0 INTRODUCTION

Greengage Environmental Limited (Greengage) was commissioned by London Borough of Lambeth in April 2025 to undertake a Biodiversity Net Gain Assessment (BNGA), using the Statutory Biodiversity Metric (SBM), for an area of land in Brockwell Park, hereafter referred to as 'the site'.

This document is a report of the baseline BNGA and has been produced to support the discharge of conditions relating to planning application (reference: 25/00693/RG3). In particular Condition 16, which states:

"A Biodiversity Net Gain assessment and metric calculation shall be submitted to and approved by the local planning authority in writing prior to the 11/05/2025."

Under the Environment Act 2021, developments are mandated to achieve a 10% biodiversity net gain (BNG), and they may also be required to under local policy. Most Local Planning Authorities (LPA) require a 10% net gain delivered against a site's pre-development (baseline) value. This is determined through assessing the condition of pre-development habitats on the site i.e. calculating the baseline at the BNGA Baseline stage, followed by comparison against the anticipated changes in biodiversity value based on the development proposals.

This BNGA has been undertaken in May 2025. Any further changes to the design will impact upon the BNG score and the SBM calculations will need to be updated to reflect such changes. This also carries forward throughout the entire lifetime of the project, including after planning permission has been granted, in and throughout the construction phase. BNG aims to give an accurate reflection of the changes happening onsite.

2.1 SITE DESCRIPTION

The site extends to approximately 16.68 hectares (ha) and is centred on Ordnance Survey National Grid Reference (OS NGR): TQ 3175 7428, OS Co-ordinates 531759, 174280.

The site comprises three distinct parcels, the main Lambeth Country Show site, the 'boneyard' and the vendors parking. The site takes up approximately a third of the park as is shown on the plan at Appendix A.

The site comprises predominantly modified grassland, individual trees, hedgerows, buildings and sealed surfaces.

The park located in Herne Hill, an urbanised area of south London. Norwood Road (A215) runs along the eastern park boundary and Tulse Hill (A204) runs along the western park boundary, with Brixton Road (A23) located approximately 0.5 km west of the site at its closest point.

Urban public green spaces in the surrounding area includes Peabody Hill Wood located approximately 100m southeast of the site, Dulwich Sport Grounds located approximately 315m east of the site, Rosendale Allotments located approximately 320m southeast of the site, Rush Common located approximately 490m west of the site, Place Road Nature Gardens located approximately 700m southwest of the site, and Belair Park located approximately 750m east of the site.

The closest statutory site is Unigate Wood Local Nature Reserve (LNR) located approximately 1.98 km south of the site boundary. Wimbledon Common Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) located approximately 7.9 km west of the site. Including the park itself, 32 Site of Importance for Nature Conservation (SINCs) were identified within 2km of the site

3.0 METHODOLOGY

3.1 PRE-DEVELOPMENT (BASELINE)

Habitat data

A Preliminary Ecological Appraisal (PEA) has been undertaken by Greengage in accordance with guidance in the UK Habitat Classification System (UKHab)¹ and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal^{2,3} in accordance with British Standard (BS) 42020: 2013: Biodiversity⁴.

The PEA included a site walkover which identified and mapped the extent and distribution of different habitat types onsite according to the standard UKHab classification methodology, i.e. using Primary Codes, and supplemented with Secondary Codes. Habitats have been split into 'habitat parcels' within the report, for the purposes of denoting differentiations in characteristics/composition within habitat types, where applicable. A habitat map was produced to illustrate the results, which is provided as Appendix A.

During the PEA, the habitats were also subject to Condition Assessments, where relevant, in accordance with the SBM Condition Assessments. (See 'Habitat Condition' below).]

SBM calculation tool

This BNGA uses the government mandated methodology within the 'Statutory Biodiversity Metric User Guide' (SBM User Guide), distributed by Department for Food Environment and Rural Affairs (Defra), February 2024⁵.

BNG uses habitat type and condition as a proxy for overall biodiversity value, measured in Biodiversity Units (BU) which are calculated using the SBM. The BU are separated into area-based Habitat Units (HU), linear-based Hedgerow Units (HeU) and aquatic linear-based Watercourse Units (WU), as applicable to a site, respectively. For this site, HU and HeU are applicable.

The following information on each habitat type are the required SBM inputs:

- Type;
- Area/length;
- Condition; and
- Strategic significance.

The areas of each habitat parcel are measured, with each habitat parcel assigned a 'Distinctiveness', 'Condition' and 'Strategic Significance' score. Distinctiveness is a default score for the habitat classification, representing its inherent biodiversity value, whereas condition refers to the state each habitat parcel is in relative to a predetermined set of criteria outlined in the SBM User Guide.

Strategic significance draws upon priorities and objectives within local plans and strategies, and is measured by providing habitats with a score from low to high as follows:

- Low - "area / compensation not in local strategy";
- Medium - "location ecologically desirable but not in local strategy"; and
- High - "formally identified in local strategy".

To calculate the pre-development (baseline) BU value, habitat data collected during the PEA has been used. A BNGA habitat map has been created based on the data collected in the field using Coreo⁶ software. The area extents for each habitat type shown in the BNGA habitat map were then measured using Quantum Geographical Information System (QGIS) software. See Figure A.1 in Appendix A.

To calculate the HU associated with trees onsite, stem diameters of each tree were used to assign each tree a rating of 'small', 'medium', 'large' or 'very large', in line with the User Guide. The rating corresponds to an area value to be used.

Distinctiveness values were automatically calculated for the site and habitat conditions were assessed both in the field, and retrospectively using site photos.

Type and area/length

Habitat types documented in the PEA use UKHab classifications and primary codes supplemented by secondary codes, where applicable. The SBM uses a classification system based mainly on the UKHab Classification System¹ but with input also from other systems including the Water Framework Directive (WFD) Lakes Typology⁷, the European Nature Information System (EUNIS) habitat definitions⁸, Habitats Directive Annex 1 definitions⁹.

As such, UKHab classifications used in the PEA do not always translate directly into the SBM habitat types that are available for selection within the pre-set drop-down menus. Occasionally UK Hab secondary codes provide the key information to be able to allocate the SBM 'best fit' selection for the UKHab type.

A habitat parcel reference has been applied to each area-based, hedgerow-based and/or watercourse-based habitat type on the site, which is cross-referenced within the SBM calculation tool and Figure A.1.

For individual trees present on the site, the area extent attributed to individual trees has been calculated using the 'Tree helper' within the SBM calculation tool. This is based upon using Diameter at Breast Height (DBH) in centimetres (cm). The DBH measurements for individual trees within the site have been taken from the Tree Inventory.¹⁰ In accordance with the SBM User Guide, based on 'Diameter at breast height (centimetres (cm))', tree sizes have been recorded as follows;

- Small is less than 30 cm diameter,
- Medium is greater than 30 cm, to less than or equal to, 60 cm;
- Large is greater than 60 cm, to less than or equal to 90 cm; and,
- Very large is greater than 90 cm.

Each tree has been given a habitat parcel number and referred to within the 'Assessors' comment box within the SBM.

Habitat condition

Where applicable, habitats were subject to a condition assessment in accordance with the SBM Condition Assessments. Formalised copies of the Condition Assessments for the Baseline habitats are provided as Appendix B.

Habitats must be quantified using criteria set out by the SBM Condition Assessments to determine their relative condition.

The condition of a habitat is a measure of the biological 'working-order' of a habitat type judged against the perceived ecological optimum state for that particular habitat.

The condition of each habitat type was assessed against pre-set criteria and categorised as either 'Good', 'Fairly Good', 'Moderate', 'Fairly Poor' or 'Poor'. Where a habitat type varies in condition within the site this was recorded and mapped.

Strategic significance

The SBM calculation tool accounts for whether the habitat is situated in an area locally identified as significant for nature.

Data on areas and habitats locally identified as significant for nature were obtained from the following:

- Multi-Agency Geographical Information for the Countryside (MAGIC) website for mapped statutory designated sites;
- Greenspace Information for Greater London (GIGL) was consulted in May 2025 during the PEA for records of statutory and non-statutory designated sites for nature conservation within and adjacent to the site;
- Habitats listed within the Local Biodiversity Action Plan (LBAP) for London Borough of Lambeth and the London BAP;
- Local Plans;
- Local Nature Recovery Strategies;
- River Basin Management Plans;
- Catchment Plans;
- National Character Area profiles; and/or,
- Priority Habitats for Restoration.

Areas within the site that fall within a mapped designated site, have been given the highest strategic significance score of 'Formally identified within local strategy'.

Using the SBM calculation tool, habitat values have been calculated based on whether they occur commonly or whether they are rare, their area (ha) (or length (km) for linear features such as hedgerows), condition and importance within the local area, usually identified from local relevant planning policies or documents.

3.2 COMPETENICES

In accordance with 'British Standard: 8683 (BS:8683) Process for designing and implementing biodiversity net gain – Specification', this BNGA and all associated condition assessments have been completed by competent, suitability trained and qualified ecologists.

Morgan Taylor, Director, has a bachelors and masters degree in Marine Biology (MSci Hons). Morgan is a Chartered Environmentalist, Full member of CIEEM and has over 14 years' experience in ecological surveying, having undertaken assessments of numerous development sites of this type. He leads the Ecology team at Greengage.

Sam Barker, Senior Consultant, has an undergraduate degree in Environmental Science (BSc Hons), holds a Natural England Great Crested Newt Licence and is a Full member of CIEEM. Sam has over eight years' experience of delivering ecological assessments and nature led strategies. [XX]

This report was written by Sam Barker, reviewed by Morgan Taylor who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased, and exaggerated statements.

3.3 ASSUMPTIONS

SBM calculation tool

Strategic significance for the baseline has been determined to be High for all habitats as these all fall within Brockwell Park SINC.

Where there was no suitable UKHab or SBM habitat classification for a habitat, a 'best fit' alternative has been used with an explanation given to justify its use.

Note the sum of the values shown in columns within the Biodiversity Units tables may differ from the total units stated. This is due to rounding and is not considered significant. The totals stated reflect those calculated within the SBM calculation tool, based on the SBM User Guide.

4.0 RESULTS

4.1 PRE-DEVELOPMENT (BASELINE)

Desk study

Statutory designated sites

The desk study has not identified any statutory designations associated with the site itself.

The desk study has identified one statutorily designated site within 2km of the site. This is Unigate Wood LNR, 1.98km southwest of the site.

The desk study has identified that the site is located within the Impact Risk Zone (IRZ) for Wimbledon Common SSSI, which is 7.9km west of the site.

For best practice, it is acknowledged here that measures to protect these designated sites from impacts by any future development should be undertaken and are detailed in the PEA. Full details of the statutory designated sites are shown in the PEA.

Non-statutory designated sites

Records received from GIGL identified that the park is a non-statutory SINC. The GIGL desk study also identified a further 31 non-statutory designated sites within 2km of the site.

For best practice, it is acknowledged here that measures to protect these designated sites from impacts by any future development should be undertaken and are fully detailed in the PEA.

May 2025 baseline SBM calculation

Using the SBM calculation tool the baseline biodiversity value of the site has been identified to be 99.20HU and 0.38HeU.

A breakdown of the baseline calculations for HU is provided in Table 4.1 below:

Table 4.1 Baseline Habitat Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Grassland	Modified grassland	4.3958	Low	Moderate	20.22
Grassland	Modified grassland	11.0976	Low	Poor	25.52
Sparsely vegetated land	Ruderal/Ephemeral	0.096	Low	Poor	0.22
Urban	Developed land; sealed surface	1.0909	V.Low	N/A - Other	0
Individual trees	Urban tree	1.4495	Medium	Moderate	13.34

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Habitat Units
Individual trees	Urban tree	2.8912	Medium	Good	39.90
*Individual trees are not included in the total site area to avoid double counting				TOTAL	99.20

A breakdown of the baseline calculations for HeU is provided in Table 4.1 below:

Table 4.2 Baseline Hedgerow Units

Broad Habitat	Habitat Type	Length (Km)	Distinctiveness	Condition	Hedgerow Units
Hedgerow	Native hedgerow	0.083	Low	Moderate	0.38
				TOTAL	0.38

The above tables have been completed based on the methodologies detailed in Section 3.0 and on application of the below points:

- The pre-development (baseline) habitats did not appear to have been subject to degradation prior to the condition assessment i.e. the default condition level of 'Good' has not had to be assigned.
- In accordance with the SBM User Guide, 'Developed land; sealed surface'.
- There were two types of modified grassland identified within the site:
 - Parcel Reference 1 (1 on the BNG baseline maps at Appendix A - 'Modified grassland' has a condition score of 'Moderate'. These areas had an average of 6 species/m². The parcel's failed on two criteria of the 'grassland low' condition sheet, cover of bare ground was greater than 10% and there was evidence of physical damage to the sward. Full quadrats species lists can be found at Appendix C.
 - Parcel Reference 2 (2 on the BNG baseline maps at Appendix A) - 'Modified grassland' has a condition score of poor as the habitat parcels failed on the essential criteria A "there are 6-8 vascular plant species per m²" These parcels had an average 3.85 species/m². Additionally, the grassland in these only passed three of the condition criteria, "Sward height is varied", "Cover of bare ground is between 1% and 10%" and "Physical damage is evident in less than 5% of the total grassland area. Full quadrats species lists can be found at Appendix C
- The 'ruderal/ephemeral' habitat achieved a 'Poor' condition score, passing only criteria C, there is an absence of invasive non-native plant species present.

- All individual trees automatically passed condition criteria B and passed condition criteria E "Natural ecological niches were present" and criteria F "more than 20% of the tree canopy area is oversailing vegetation". After this there were two distinctions.
 - Those that are native, considered mature and have ecological niches passed a total of five condition criteria, achieving a 'Good' condition score; and
 - Those non-native species or younger native species, these passed three or four of the condition criteria, achieving a 'Moderate' condition score.
- The 'native hedgerow' habitat has been assigned a condition score of 'Moderate' due to only failing both attributes in one criterion group C and criterion D2. The hedgerows did not have undisturbed ground at their base, showed signs of nutrient enrichment and had signs of current damage.

5.0 EVALUATION AND DISCUSSION

The assessment has calculated baseline BU of the site, related to the 2025 event.

The assessment has identified that the 2025 baseline BU value is 99.20HU and 0.38HeU.

The Environment Act requires that proposals assess any permanent degradation to habitats at a site should be considered as lost habitat. Therefore, it is recommended that an updated baseline habitat condition assessment is undertaken following the event, to understand the extent of permanent damage to habitats, particularly the grassland post-event.

Therefore, we recommend that a 10% gain is sought against the post-event permanent impact, rather than the baseline recorded in May 2025.

The Environment Act requires that any permanent degradation to habitats at a site be considered as lost. Therefore, it is recommended that an updated habitat and condition assessment is undertaken following the event, to understand the extent of damage to habitats, particularly the grassland post-event. It is acknowledged this is a unique situation which is not neatly covered by the requirements of the Environment Act or the principles of BNG. We recommend that a reasonable approach would be to consider the area of habitat within the event red line that is subject to changes in habitat typology or condition following the event. We would then consider that these areas will likely take up to 3 months to recover to the pre disturbance condition (albeit monitoring should be undertaken to validate this assumption). These areas would be considered de facto permanently degraded in value by 25% (should the 3 month recovery period be validated). This would mean that 25% of the unit value for the disturbed areas would be considered as lost permanently and used to inform the offset requirement.

The production of a Habitat Management and Monitoring Plan (HMMP) is appropriate to set out the actions required to manage and maintain any retained, enhanced and newly created habitats to deliver the appropriate gains and maximise their biodiversity value over the long term (30 years minimum).

Further qualitative ecological enhancement should ideally also be targeted onsite through the provision of invertebrate habitat features, reptile and small mammal refugia and installation of bird and bat boxes, to help protect nationally and locally important species, including those specified in national, regional and local BAPs.

6.0 SUMMARY AND CONCLUSIONS

In accordance with the planning conditions associated with the Lambeth Country Show planning application London Borough of Lambeth have to deliver at least a 10% net gain in biodiversity above baseline levels, which should be evidenced through a complete BNGA using the SBM.

This BNGA has been completed to identify the pre-development (baseline) biodiversity value of the site.

The assessment has identified that the 2025 baseline BU value is 99.20HU and 0.38HeU.

Following the event, it is recommended that an updated habitat condition assessment is undertaken to quantify the area of permanent habitat loss, as a result of degradation linked to the event and the 10% uplift includes the loss of any permanently degraded habitat.

An exercise should be undertaken to identify habitat opportunities. This should be integrated within the Ecological management Plan recommended within the PEA. Any created, retained and enhanced habitats should be subject to a HMMP to cover a period of no less than 30 years.

APPENDIX A BASELINE HABITAT MAP

Figure A.1 BNG baseline habitat map

BROCKWELL PARK BNG BASELINE MAP

Legend

-  Red Line Boundary
-  Developed land; sealed surface
-  Modified grassland
-  Ruderal/Ephemeral
-  Existing Urban Tree
-  Native hedgerow

Title: Figure A.1 Brockwell Park BNG Baseline Habitat Map

Drawn by: AR
Date: 22/05/2025

Reviewed by: SB
Date: 22/05/2025

Project number: 553185
Sources: Google Satellite



Figure A.2 *BNG baseline habitat map north*

BROCKWELL PARK BNG BASELINE MAP

Legend

 Red Line Boundary

Habitats Baseline

 Developed land; sealed surface

 Modified grassland

 Ruderal/Ephemeral

 Existing Urban Tree

 Native hedgerow

Title: Figure A.2 Brockwell Park BNG Baseline Habitat
Map North

Drawn by: AR
Date: 22/05/2025

Reviewed by: SB
Date: 22/05/2025

Project number: 553185
Sources: Google Satellite



Figure A.3 BNG baseline habitat map east

BROCKWELL PARK BNG BASELINE MAP

Legend

-  Red Line Boundary
- Habitats Baseline**
-  Developed land; sealed surface
-  Modified grassland
-  Existing Urban Tree

Title: Figure A.3 Brockwell Park BNG Baseline Habitat
Map East

Drawn by: AR
Date: 22/05/2025

Reviewed by: SB
Date: 22/05/2025

Project number: 553185
Sources: Google Satellite



1:1,800
0 0.025 0.05 km



Figure A.4 BNG baseline habitat map south

BROCKWELL PARK BNG BASELINE MAP

Legend

 Red Line Boundary

Habitats Baseline

 Modified grassland

 Existing Urban Tree

Title: Figure A.4 Brockwell Park BNG Baseline Habitat
Map south

Drawn by: AR
Date: 22/05/2025

Reviewed by: SB
Date: 22/05/2025

Project number: 553185
Sources: Google Satellite



APPENDIX B CONDITION ASSESSMENTS

The highlighted green text below indicates which condition has been achieved for each habitat.

Baseline habitats

Modified grassland - Moderate condition (habitat parcel references 1)

Table B.1 Modified grassland - moderate condition score

Condition assessment criteria		Criterion passes (Yes or No)
A	There are 6-8 vascular plant species per m ² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition.	Yes
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Yes
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present).	Yes
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities (Footnote 2).	No
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	No
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes
G	There is an absence of invasive non-native plant species (Footnote 3) (as listed on Schedule 9 of WCA (Footnote 4)).	Yes
Essential criterion achieved (Yes or No)		Yes
Number of criteria passed		5
Condition Assessment Result		Condition Assessment Score
Passes 6 or 7 criteria including passing essential criterion A		Good (3)

Condition assessment criteria		Criterion passes (Yes or No)
Passes 4 or 5 criteria including passing essential criterion A		Moderate (2)
Passes 3 or fewer criteria; OR Passes 4 -6 criteria (excluding criterion A)		Poor (1)
Footnotes		
Footnote 1 - Creeping thistle <i>Cirsium arvense</i>, spear thistle <i>Cirsium vulgare</i>, curled dock <i>Rumex crispus</i>, broad-leaved dock <i>Rumex obtusifolius</i>, common nettle <i>Urtica dioica</i>, creeping buttercup <i>Ranunculus repens</i>, greater plantain <i>Plantago major</i>, white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i>. Footnote 2 - For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover. Footnote 3 - Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels, accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement. Footnote 4 - Wildlife and Countryside Act 1981 (as amended).		

Modified grassland - Poor condition (habitat parcel references 2)

Table B.2 Modified grassland - poor condition score

Condition assessment criteria		Criterion passes (Yes or No)
A	There are 6-8 vascular plant species per m ² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition.	No
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present).	Yes
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities (Footnote 2).	No
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	No
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes
G	There is an absence of invasive non-native plant species (Footnote 3) (as listed on Schedule 9 of WCA (Footnote 4)).	Yes

Condition assessment criteria	Criterion passes (Yes or No)
Essential criterion achieved (Yes or No)	No
Number of criteria passed	3
Condition Assessment Result	Condition Assessment Score
Passes 6 or 7 criteria including passing essential criterion A	Good (3)
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)
Passes 3 or fewer criteria; OR Passes 4 -6 criteria (excluding criterion A)	Poor (1)
Footnotes	
Footnote 1 - Creeping thistle <i>Cirsium arvense</i>, spear thistle <i>Cirsium vulgare</i>, curled dock <i>Rumex crispus</i>, broad-leaved dock <i>Rumex obtusifolius</i>, common nettle <i>Urtica dioica</i>, creeping buttercup <i>Ranunculus repens</i>, greater plantain <i>Plantago major</i>, white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i>. Footnote 2 - For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover. Footnote 3 - Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels, accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement. Footnote 4 - Wildlife and Countryside Act 1981 (as amended).	

Urban - Sparsely vegetated land - Ruderal/ephemeral

Table B.3 Ruderal/ephemeral - poor condition score

Condition assessment criteria		Pass
Core Criteria - must be assessed for all urban habitat types:		
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	N
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	N
C	Invasive non-native plant species (listed on Schedule 9 of WCA1) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area.	Y

Condition assessment criteria		Pass
	Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	
Essential criterion achieved (Yes or No)		No
Number of criteria passed		1
Condition assessment result		Condition assessment score
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):		
Passes all 3 criteria; AND Meets the requirements for Good condition within criterion C		Good (3)
Passes 2 of 3 core criteria; OR Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)
Passes 0 or 1 of 3 core criteria.		Poor (1)

Individual trees - Urban trees - Good condition

Table B.4 Urban trees - good condition score

Condition assessment criteria		Pass
A	The tree is a native species (or more than 70% within the block are native species).	Y
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y
C	The tree is mature (or more than 50% within the block are mature).	Y
D	There is little or no evidence of an adverse impact on tree health by anthropogenic activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime; so the trees retain >75% of expected canopy for their age range and height.	N
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Y
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y
Condition assessment result		Condition assessment score
Passes 5 or 6 of 6 criteria		Good (3)

Condition assessment criteria	Pass
Passes 3 or 4 of 6 criteria	Moderate (2)
Passes 2 or fewer of 6 criteria	Poor (1)

Individual trees - Urban trees - Moderate condition

Table 6.1 Urban trees- moderate condition score

Condition assessment criteria	Pass
A The tree is a native species (or more than 70% within the block are native species).	N
B The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y
C The tree is mature (or more than 50% within the block are mature).	N
D There is little or no evidence of an adverse impact on tree health by anthropogenic activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime; so the trees retain >75% of expected canopy for their age range and height.	N
E Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Y
F More than 20% of the tree canopy area is oversailing vegetation beneath.	Y
Condition assessment result	Condition assessment score
Passes 5 or 6 of 6 criteria	Good (3)
Passes 3 or 4 of 6 criteria	Moderate (2)
Passes 2 or fewer of 6 criteria	Poor (1)

Native hedgerow

Table B.5 Native hedgerow - moderate condition score

Condition assessment criteria	Pass
A1. Height >1.5 m average along length	Y
A2. Width >1.5 m average along length	Y
B1. Gap - hedge base Gap between ground and base of canopy <0.5 m for >90% of length	Y
B2. Gap - hedge canopy continuity Gaps make up <10% of total length; and No canopy gaps >5 m	Y
C1. Undisturbed ground and perennial vegetation >1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length:	N

Condition assessment criteria			Pass
		Measured from outer edge of hedgerow; and Is present on one side of the hedgerow (at least).	
C2.	Nutrient-enriched perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground.	N
D1.	Invasive and neophyte species	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA3) and recently introduced species.	Y
D2.	Current damage	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities.	N
Condition assessment result			Condition assessment score
No more than 2 failures in total; and No more than 1 failure in any functional group			Good (3)
No more than 4 failures in total; and Does not fail both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and C2 = moderate condition)			Moderate (2)
Fails a total of more than 4 attributes; or Fails both attributes in more than one functional group (A1, A2, B1 and B2 = poor condition)			Poor (1)

Urban - Developed land; sealed surface

No assessment is required for this habitat as the condition is fixed within the SBM as N/A.

APPENDIX C GRASSLAND CONDITION QUADRATS

C.1 MODIFIED GRASSLAND QUADRATS - MODERATE CONDITION

Table C.1 Grassland quadrats within the moderate condition areas of the site

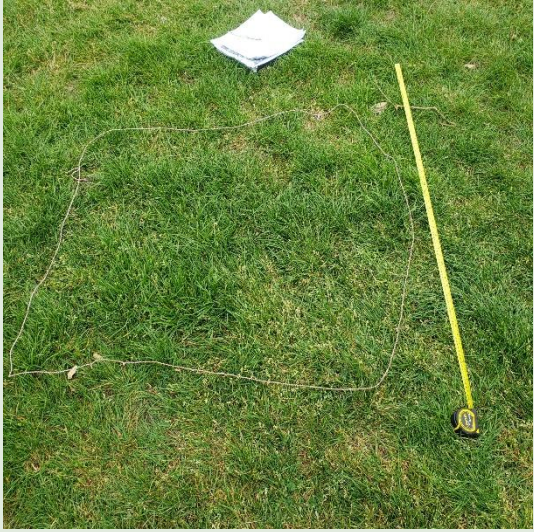
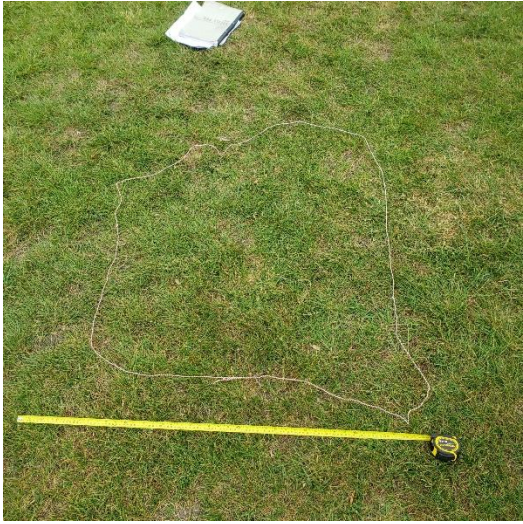
Average = 6 species/m ²	
Quadrat 1	Quadrat 2
	
Location: TQ 3199 7422	Location: TQ 3188 7400
Species - 4 species/m ²	Species - 6 species/m ²
Yarrow (<i>Achillea millefolium</i>)	Cow parsley (<i>Anthriscus sylvestris</i>)
Meadow foxtail (<i>Alopecurus pratensis</i>)	Cock's-foot (<i>Dactylis glomerata</i>)
Dandelion (<i>Taraxacum</i> sp.)	Creeping buttercup (<i>Ranunculus repens</i>)
Perennial rye-grass (<i>Lolium perenne</i>)	Perennial rye-grass (<i>Lolium perenne</i>)
	Annual meadow grass (<i>Poa annua</i>)
	Dandelion (<i>Taraxacum</i> sp.)
Quadrat 3	Quadrat 4
	
Location: TQ 3193 7400	Location: TQ 3177 7404

Average = 6 species/m ²	
Species - 7 species/m ²	Species - 7 species/m ²
Poplar (<i>Populus</i> sp.)	Perennial rye-grass (<i>Lolium perenne</i>)
Creeping buttercup (<i>Ranunculus repens</i>)	Broadleaved plantain (<i>Plantago major</i>)
Meadow buttercup (<i>Ranunculus acris</i>)	Annual meadow grass (<i>Poa annua</i>)
Dandelion (<i>Taraxacum</i> sp.)	White clover (<i>Trifolium repens</i>)
perennial rye-grass (<i>Lolium perenne</i>)	Autumn hawkbit (<i>Scorzonoides autumnalis</i>)
Meadow foxtail (<i>Alopecurus pratensis</i>)	Sow thistle (<i>Sonchus oleraceus</i>)
Annual meadow grass (<i>Poa annua</i>)	Dandelion (<i>Taraxacum</i> sp.)
Quadrat 6	Quadrat 7
	
Location: TQ 31583 74164	Location: TQ 3178 7419
Species - 6 species/m ²	Species - 8 species/m ²
Rough meadow grass (<i>Poa trivialis</i>)	Creeping buttercup (<i>Ranunculus repens</i>)
Perennial rye-grass (<i>Lolium perenne</i>)	Broadleaved plantain (<i>Plantago major</i>)
White clover (<i>Trifolium repens</i>)	White clover (<i>Trifolium repens</i>)
Hedge mustard (<i>Sisymbrium officinale</i>)	Perennial rye-grass (<i>Lolium perenne</i>)
Dandelion (<i>Taraxacum</i> sp.)	Dandelion (<i>Taraxacum</i> sp.)
Common daisy (<i>Bellis perennis</i>)	Rough meadow grass (<i>Poa trivialis</i>)
	Meadow foxtail (<i>Alopecurus pratensis</i>)
	Cock's-foot (<i>Dactylis glomerata</i>)

Biodiversity Net Gain Assessment - Baseline

Average = 6 species/m ²	
Quadrat 10	Quadrat 11
	
Location: TQ 3200 7416	Location: TQ 3205 7408
Species - 9 species/m ²	Species - 8 species/m ²
Autumn hawkbit (<i>Scorzoneroide autumnalis</i>)	Cow parsley (<i>Anthriscus sylvestris</i>)
Yarrow (<i>Achillea millefolium</i>)	Cock's-foot (<i>Dactylis glomerata</i>)
Meadow foxtail (<i>Alopecurus pratensis</i>)	Cleavers (<i>Gallium aparine</i>)
Rough meadow grass (<i>Poa trivialis</i>)	Meadow foxtail (<i>Alopecurus pratensis</i>)
Dandelion (<i>Taraxacum sp.</i>)	Rough meadow grass (<i>Poa trivialis</i>)
Perennial rye-grass (<i>Lolium perenne</i>)	Creeping buttercup (<i>Ranunculus repens</i>)
White clover (<i>Trifolium repens</i>)	White clover (<i>Trifolium repens</i>)
Daffodil (<i>Narcissus sp.</i>)	Meadow cranesbill (<i>Geranium pratense</i>)
Annual meadow grass (<i>Poa annua</i>)	

Average = 6 species/m ²	
Quadrat 12	Quadrat 13
	
Location: TQ 3167 7366	Location: TQ 3155 7372
Species - 5 species/m ²	Species - 5 species/m ²
Meadow foxtail (<i>Alopecurus pratensis</i>)	Meadow buttercup (<i>Ranunculus acris</i>)
Meadow buttercup (<i>Ranunculus acris</i>)	White clover (<i>Trifolium repens</i>)
Perennial rye-grass (<i>Lolium perenne</i>)	Perennial rye-grass (<i>Lolium perenne</i>)
Dandelion (<i>Taraxacum</i> sp.)	Meadow foxtail (<i>Alopecurus pratensis</i>)
White clover (<i>Trifolium repens</i>)	Annual meadow grass (<i>Poa annua</i>)

Average = 3.85 species/m ²	
Quadrat 4	Quadrat 5
	
Location: TQ 3181 7408	Location: TQ 3175 7408
Species - 3 species/m ²	Species - 4 species/m ²
Perennial rye-grass (<i>Lolium perenne</i>)	Annual meadow grass (<i>Poa annua</i>)
Broadleaved plantain (<i>Plantago major</i>)	Perennial rye-grass (<i>Lolium perenne</i>)
Annual meadow grass (<i>Poa annua</i>)	Dandelion (<i>Taraxacum</i> sp.)
	Broadleaved plantain (<i>Plantago major</i>)
Quadrat 6	Quadrat 7
	
Location: TQ 3165 7406	Location: TQ 3158 7395
Species - 4 species/m ²	Species - 3 species/m ²
Annual meadow grass (<i>Poa annua</i>)	Perennial rye-grass (<i>Lolium perenne</i>)
White clover (<i>Trifolium repens</i>)	Creeping buttercup (<i>Ranunculus repens</i>)
Broadleaved plantain (<i>Plantago major</i>)	White clover (<i>Trifolium repens</i>)

Average = 3.85 species/m ²	
Perennial rye-grass (<i>Lolium perenne</i>)	
<u>Quadrat 8</u>	<u>Quadrat 9</u>
	
Location: TQ 3156 7396	Location: TQ 3170 7413
Species - 5 species/m ²	Species - 4 species/m ²
Shepherd's-purse (<i>Capsella bursa-pastoris</i>)	Perennial rye-grass (<i>Lolium perenne</i>)
Broadleaved plantain (<i>Plantago major</i>)	Annual meadow grass (<i>Poa annua</i>)
Annual meadow grass (<i>Poa annua</i>)	Cat's-ear (<i>Hypochaeris radicata</i>)
White clover (<i>Trifolium repens</i>)	Broadleaved plantain (<i>Plantago major</i>)
Common daisy (<i>Bellis perennis</i>)	
<u>Quadrat 10</u>	<u>Quadrat 11</u>
	

Average = 3.85 species/m ²	
Location: TQ 3158 7431	Location: TQ 3173 7425
Species - 5 species/m ²	Species - 2 species/m ²
Annual meadow grass (<i>Poa annua</i>)	Shepherd's purse (<i>Capsella bursa-pastoris</i>)
Cat's-ear (<i>Hypochaeris radicata</i>)	Annual meadow grass (<i>Poa annua</i>)
Perennial rye-grass (<i>Lolium perenne</i>)	
Broadleaved plantain (<i>Plantago major</i>)	
Dandelion (<i>Taraxacum</i> sp.)	
<u>Quadrat 12</u>	<u>Quadrat 13</u>
	
Location: TQ 3189 7422	Location: TQ 3188 7427
Species - 4 species/m ²	Species - 6 species/m ²
Broadleaved plantain (<i>Plantago major</i>)	Broadleaved plantain (<i>Plantago major</i>)
Daisy (<i>Bellis perennis</i>)	Cat's-ear (<i>Hypochaeris radicata</i>)
Perennial rye-grass (<i>Lolium perenne</i>)	Perennial rye-grass (<i>Lolium perenne</i>)
Annual meadow grass (<i>Poa annua</i>)	Annual meadow grass (<i>Poa annua</i>)
	Dandelion (<i>Taraxacum</i> sp.)
	White clover (<i>Trifolium repens</i>)

Average = 3.85 species/m ²	
<u>Quadrat 14</u>	
	
Location: TQ 3161 7368	
Species - 5 species/m ²	
White clover (<i>Trifolium repens</i>)	
Annual meadow grass (<i>Poa annua</i>)	
Perennial rye-grass (<i>Lolium perenne</i>)	
Dandelion (<i>Taraxacum</i> sp.)	
Meadow buttercup (<i>Ranunculus acris</i>)	

APPENDIX D RELEVANT LEGISLATION AND POLICY

D.1 LEGISLATION

The BNGA has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:

- UK Government's 25 Year Environment Plan (DEFRA, 2018);
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (DEFRA, 2011);
- National Planning Policy Framework (NPPF) (MHCLG, 2023);
- The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006); and
- The Environment Act (DEFRA, 2021).

The Environment Act, 2021

Under the Environment Act, 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, 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 off-site compensation, or the purchase of statutory credits.

The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the 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.

Under the Act, the enhancements must be maintained for at least 30 years.

D.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2023¹¹ 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.

Regional

The London Plan¹²

Policy G1 Green infrastructure

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

Policy G5 Urban greening

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

Policy G6 Biodiversity and access to nature

8. Sites of Importance for Nature Conservation (SINCs) should be protected.
9. Boroughs, in developing Development Plans, should:
 - a. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
 - b. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
 - c. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
 - d. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
 - e. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
10. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
 - a. avoid damaging the significant ecological features of the site
 - b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
 - c. deliver off-site compensation of better biodiversity value.
11. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
12. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

13. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
14. In their Development Plans, boroughs should:
 - a. Protect 'veteran' trees and ancient woodland where these are not already part of a protected site
 - b. Identify opportunities for tree planting in strategic locations
15. Development proposals should ensure that, wherever possible, existing trees of quality are retained [Category A and B]. If planning permission is granted that necessitates the removal of trees, there

should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

London Environment Strategy 2018¹³

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

Objective 5.1 Make more than half of London green by 2050

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

This policy states:

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

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

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

Objective 5.2 Conserving and enhancement wildlife and natural habitats

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

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

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

Local

Lambeth Local Plan 2020-2035¹⁴

Policy EN1: Open space, green infrastructure and biodiversity

The council will meet requirements for open space and green infrastructure by:

16. Protecting and maintaining open spaces, green infrastructure and their function. Development which would involve the loss of existing public or private open space will not be permitted unless at least one of the following tests is met:
 - a. Replacement open space of equivalent or better quality and quantity is provided within a suitable location in the local area.
 - b. In the case of housing estate amenity areas, significant regeneration and community benefits would be achieved that could not be achieved in any other way, and appropriate compensatory provision for the loss of open space is made, including improvements to the quality of the remaining open space.
 - c. It is for the provision of facilities directly related to the use of open space including ecology centres, indoor sports facilities, changing rooms, toilets or cafes as long as these are appropriate in scale and form to the size and character of the open space and acceptable in terms of impact on openness and do not harm the function and operation of the open space.
17. Preventing development which would result in loss, reduction in area or significant harm to the nature conservation or biodiversity value of an open space including any designated or proposed Local Nature Reserves (LNR) or Sites of Importance for Nature Conservation (SINC) unless adequate mitigation or compensatory measures of equivalent or better biodiversity value are included, appropriate to the nature conservation value of the assets involved. In the case of SINC, the mitigation hierarchy in London Plan policy G6 C will apply.
18. In accordance with London Plan policy G6, development proposals should wherever possible protect, enhance, create or manage nature conservation and biodiversity interest in accordance with the borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy.
19. Increasing the quantity of open space and green infrastructure in the borough through proposals such as the Vauxhall Square initiative, the ^a To table of contents 159 Lambeth Local Plan 2020–2035 | Section 9: Environment and Green Infrastructure extension of Jubilee Gardens and by linking existing spaces through green chains, the Greenway and Thames Path National Walking trail initiatives, but also through:
 - a. The provision of open space in new developments appropriate to their scale, the uses involved and the location of the development.
 - b. Requiring major development in areas of open space deficiency and/ or in areas of access to nature deficiency to provide new on-site open space/access to nature improvements. Where the development proposal includes residential units, this new open space should be in addition to the external amenity space requirements in Local Plan policy H5. Where it is demonstrated

to the satisfaction of the council that new on-site open space provision or access to nature improvements would not be feasible and/or effective, a payment in lieu will be sought as a planning obligation to enable the provision of new open space or improvements to the accessibility of existing public open space in the vicinity of the development, including their nature conservation and biodiversity value. Planning obligations will also be sought towards management and maintenance of new or improved open space.

- c. Where appropriate and feasible, ensuring that development is designed so as to contribute to the creation or extension of green chains and links ('green corridors') involving safe, healthy, convenient and attractive access for pedestrians and cyclists and to promote migration and protection of plants, animals and habitats of biodiversity importance.
1. Improving the quality of, and access to, existing open space and green infrastructure, including the range of facilities available and its biodiversity and nature conservation value and heritage value, through various means including the implementation of the Lambeth Open Spaces Strategy and Lambeth Green Infrastructure Strategy. F. Applying London Plan policy G5 in relation to the urban greening factor for major developments. For other developments the council will strongly encourage inclusion of urban greening measures. Development proposals should incorporate living roofs and walls where feasible and appropriate to the character and context of the development. All proposals should include a maintenance plan for the lifetime of the development. Planning obligations may be sought to cover future maintenance of green infrastructure.

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- ⁵ Department for Environment Food and Rural Affairs (2024) The Statutory Biodiversity Metric User Guide. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides#:~:text=The%20statutory%20biodiversity%20metric%20tool,the%20statutory%20biodiversity%20metric%20tool>
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