



Brighter strategies
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Client: Hawkins Brown
Project: Haringey Civic Centre
Report: Biodiversity Impact Assessment (BIA)

QUALITY ASSURANCE

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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd was commissioned to undertake a Biodiversity Net Gain Assessment by Hawkins Brown of a site known as the Haringey Civic Centre in the London Borough of Haringey.

The development seeks to re-furbish the existing buildings on site and construct a new part. The existing buildings and the majority of existing trees will be retained.

The assessment aimed to quantify the predicted change in ecological value of the site in light of the proposed development to assess compliance against local and national planning policy.

The survey area extends to approximately 1 hectare and comprises buildings, hardstanding, amenity grassland, introduced shrub and scattered trees, all of which are commonly distributed in the surrounding area.

Proposed habitat creation includes buildings, hardstanding, biodiverse green roofs, native hedgerow, proposed trees, introduced shrub, amenity grassland and rain gardens. The development seeks to retain the majority of existing trees.

The proposals stand to result in a net gain of 0.30 biodiversity units associated with area-based habitats compared with pre-development value. This equivalent to a total net increase of 10.13% in ecological value. There has also been a net gain of 0.12 biodiversity hedgerow units which is equivalent to 100% net gain in hedgerow units, although a percentage of zero can't be derived.

Detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and management could be provided within an Ecological Management Plan for the site which could be secured through planning condition.

2.0 INTRODUCTION

Greengage was commissioned to undertake a Biodiversity Net Gain Assessment by Hawkins Brown of a site known as the Haringey Civic Centre in the London Borough of Haringey.

The development seeks to re-furbish the existing buildings on site and construct a new part. The existing buildings and the majority of existing trees will be retained.

This survey aimed to establish change in ecological value of the site in light of the proposed development, taking into account direct and indirect impacts.

2.1 SITE DESCRIPTION

The survey area extends to approximately 1 hectare (ha) and is centred on National Grid Reference TQ 30820 90721, OS Co-ordinates 530820, 190721.

The habitats on site comprise buildings, hardstanding, amenity grassland, introduced shrub and scattered trees, all of which are common and widespread in the surrounding area.

The site is situated within an urban setting with Alexandra Palace located appropriately 600m to the southwest. The immediate surroundings to the north and south consist of a mix of residential and commercial buildings. Greenspace is more prominent to the east and west with the school grounds of Trinity Primary Academy to the immediate west and Crescent Gardens to the east.

Residential development is dominant in the surroundings to the north, south, east and west. The most significant area of greenspace, Alexandra Park, lies approximately 700m to the south west, and is ecologically connected to site via smaller pockets of greenspace such as parks, private gardens and tree lined streets.

3.0 METHODOLOGY

3.1 BIODIVERSITY METRIC

To calculate the ecological value of the pre- and post-development site, the Natural England Metric 3.1 methodology was utilised, following best practice guidance from Natural England^{1,2}, and joint guidance from CIEEM, IEMA and CIRIA³.

This metric uses Biodiversity Units as a proxy for the ecological value of area of linear based habitats. The areas of each habitat parcel are measured, with each parcel assigned a 'Distinctiveness' and 'Condition' score. Distinctiveness is a default score for the habitat classification, representing its inherent ecological value, whereas condition refers to the state each parcel is in relative to predetermined set of criteria outlined in the supplementary Biodiversity Metric 3.1 guidance.

For post-development habitat areas, additional multipliers are applied taking into account the time taken to reach maturity and difficulty of creation of the habitats, and whether the habitat creation is in a strategically beneficial location.

An assessment of the predicted change in ecological value is undertaken comparing the Biodiversity Units and assessing percentage change. Changes in broader habitat types (for example, 'Urban', 'Woodland' and 'Grassland' habitats) are also tracked, and trading habitats is discouraged unless specifically targeted within a local strategy. Trading down of habitats is not permitted.

3.2 BASELINE CALCULATION

To calculate pre-development Biodiversity Units, data collected during a Preliminary Ecological Appraisal (PEA) undertaken by Greengage on 12th January 2023 was assessed (doc ref: 551475_IN_15Mar23_PEA_FV01.docx). Areas of each habitat type were taken from the UKHab Habitat Map (Appendix A) and data relating to the condition of habitat parcels was collected in the field.

Additionally, to calculate the Biodiversity Units associated with trees on site, data tables from the Tree Survey Report undertaken by Treework Environmental Practice in 2012 (ref: BS5837-2012), as well as the DWG file showing existing canopy areas, were used to calculate total canopy area pre-development. The client provided a canopy area figure for proposed trees.

3.3 PROPOSED DEVELOPMENT CALCULATIONS

The proposals seek to re-furbish the existing buildings on site and construct a new part. This scheme has the primary aim of repairing, refurbishing and bringing up to modern standards the Grade II listed Haringey Civic Centre built in the late 1950s. It also looks to enhance the external areas belonging to the centre in order to provide a high quality landscape setting for the Civic centre in keeping with the surrounding network of green spaces. A new residential development is proposed for the North West of the site which will include communal garden space for residents.

Drawings of the proposed development used for this assessment were:

- Churchman Thornhill Finch (02/15/22), Site Planting Plan (ref: 556-CTF-ZZ-ZZ-DR-L-500000);
- Churchman Thornhill Finch (11/22/21), Landscape Site Plan (ref: 556-CTF-ZZ-00-DR-L-100000);
- Churchman Thornhill Finch (02/22/22), Tree Removal Plan (ref: 556-CTF-ZZ-00-DR-L-100003-P03); and
- Churchman Thornhill Finch (02/21/23), Planting Areas (ref: 556-210014) (see Appendix A).

Areas of each habitat type were measured from this plan and targeted condition scores used, taking into account the likely future use of each area.

3.4 COMPETENCIES

Georgia Alfreds has a degree in Geography (BSc Hons), an MSc in Environmental Biology: Conservation and Resource Management and is an Associate member of CIEEM with 7 years' experience in ecological survey and assessment.

Paul White, who reviewed this report, has a Bachelor's degree in Marine Biology (BSc Hons), a Natural England Great Crested Newt Licence (2018-38559-CLS-CLS) and Dormouse Licence (2020-44691-CLS-CLS), and is an Associate member of CIEEM. Paul has over 15 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was written by Georgia Alfreds and reviewed and verified by Paul White 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.

3.5 CONSTRAINTS

The assessment methodology does not incorporate ecological features beyond area and linear based habitats. The potential for the site to support protected species, for example, is not captured by this assessment. As such this report should be read in conjunction with all other ecological reports for the site. The mitigation hierarchy in relation to protected and notable habitats and species must be followed. This report should accordingly be read in conjunction with the PEA and any other appropriate protected species surveys.

The BNG assessment at this stage is predictive in nature. To ensure delivery of BNG, requirements outlined within this report must be adhered to, and a rigorous programme of monitoring and maintenance must be implemented.

4.0 RESULTS

4.1 BASELINE CONDITIONS

Baseline - Broad Habitats

The baseline biodiversity value of the site is calculated to be 2.95 biodiversity units. A breakdown of this calculation is provided in Table 4.1:

Table 4.1 Baseline Biodiversity Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Biodiversity Units
Urban - hard standing	Developed land; sealed surface	0.417	V.Low	N/A - Other	0.00
Urban - building	Developed land; sealed surface	0.2069*	V.Low	N/A - Other	0.00
Grassland	Modified grassland	0.2198	Low	Poor	0.44
Grassland	Modified grassland	0.1301	Low	Poor	0.26
Urban	Introduced shrub	0.0482	Low	Condition Assessment N/A	0.10
Urban	Urban Tree	0.2646	Medium	Moderate	2.12**
Urban	Introduced shrub	0.0008	Low	Condition Assessment N/A	0.00***
Urban	Vacant/derelict land/ bareground	0.0167	Low	Poor	0.03
				TOTAL	2.95

*All of which is being retained.

** Of which 0.2302ha/ 1.84 Biodiversity Units will be retained.

*** Of which 0.0008ha/ 0.00 Biodiversity Units will be retained.

Urban - Developed Land; Sealed Surface (Hardstanding)

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

Urban - Developed Land; Sealed Surface (Buildings)

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

Grassland - Modified Grassland

The site contained several parcels of amenity grassland. The grassland does not contain 6-8 species per m² and the sward height is short and not varied. Scattered scrub makes up less than 20% of the total grassed area. Physical damage is more than 5% of total grassed area due to a regular mowing regime and cover of bare ground is less than 1% on the majority of site, but is more than 10% in the south of the site. Cover of bracken is less than 20% and there is an absence of Schedule 9 invasive non-native species. Therefore, the grassland achieves a 'poor' condition.

Urban - Introduced Shrub

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

Urban - Urban Tree (Scattered Trees)

Where trees are grouped together the tree canopy is continuous and less than 50% of trees are mature or veteran. Although the trees are thought to be pruned for aesthetic purposes, the trees are thought to retain 75% of their expected canopy for their age range and height. No management regime, encouraging micro habitats is in place. The trees are generally adjacent to other vegetation and the canopies oversailing vegetation beneath. The scattered trees therefore achieve a 'moderate' condition.

Urban - Vacant/derelict land/ bare ground

Using the Urban condition assessment criteria, the vacant/derelict land/bare ground is not varied and does not offer a diverse range of flowering plants but there is an absence of invasive non-native species, therefore this habitat achieves 'poor' condition.

Assessment Criteria for the above habitats is given in Appendix C.

4.2 PROPOSED SITE LAYOUT

Proposed - Broad Habitats

Based on masterplan drawings, the proposed development is predicted to provide 1.36 biodiversity units as shown in Table 4.2.

Table 4.2 Post-Development Biodiversity Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Biodiversity Units
Urban	Rain garden	0.0323	Low	Good	0.16
Grassland	Modified grassland	0.0436	Low	Moderate	0.15
Urban	Introduced shrub	0.0341	Low	Condition Assessment N/A	0.07
Urban	Introduced shrub	0.0139	Low	Condition Assessment N/A	0.03
Urban	Introduced shrub	0.0382	Low	Condition Assessment N/A	0.07
Urban	Introduced shrub	0.0759	Low	Condition Assessment N/A	0.15
Urban	Introduced shrub	0.0028	Low	Condition Assessment N/A	0.01
Urban	Biodiverse green roof	0.0463	Medium	Good	0.26
Urban	Developed land; sealed surface	0.4891	V.Low	N/A - Other	0.00
Urban	Urban Tree	0.035	Medium	Moderate	0.11
Heathland and shrub	Mixed scrub	0.0344	Medium	Good	0.29
Heathland and shrub	Mixed scrub	0.007	Medium	Good	0.06

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Biodiversity Units
Heathland and shrub	Mixed scrub	0.015	Medium	Good	0.13
				TOTAL	1.40*

*Excluding 1.84 Biodiversity Units retained from tree canopy. The total habitat units exclude the additional units provided by the retention of street tree habitat, which amounts to 1.84 biodiversity units, totalling 3.25.

Urban - Rain Garden

Proposals have not been finalised at this stage, but using the Urban condition assessment criteria, this habitat is likely to contain a varied vegetation structure, providing opportunities for insects, birds and bats to live and breed. There will be a diverse range of native and non-native flowering plant species, providing nectar sources for insects and invasive species will cover less than 5% of the total vegetated area. It is anticipated that the mix will include primarily non natives but sufficient diversity of natives will be included to ensure that ecological functionality of native wetland species is provided. The metric does not accurately reflect the realities the pressure upon urban green infrastructure from climate change and the urban heat island effect in locations such as this, so this is considered entirely appropriate and justifiable from an ecological perspective. Therefore, this habitat will achieve a 'good' condition.

Grassland - Modified Grassland (Lawn Planting)

A species mix has not been chosen for the grass as of yet, however, it has been assumed that the grassland will contain 6-8 species per m², however the sward height will not be varied. Scattered scrub will make up less than 20% of the total grassed area. Physical damage will be more than 5% of total grassed area due to a regular mowing regime and cover of bare ground will be less than 1%. Cover of bracken will be less than 20% and there will be an absence of Schedule 9 invasive non-native species. Therefore, the proposed grassland will achieve a 'moderate' condition.

Urban - Introduced Shrub

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

Heathland and scrub - Mixed scrub

Habitat along the western boundary of the site will be planted with mixed scrub. Proposals have not been finalised at this stage, but using the Scrub condition assessment criteria, habitat will be representative of UKHab description, with at least 3 woody species, with no one species comprising more than 75% of the cover. There will be a good age range, including seedlings, young shrubs and mature shrubs. There will be an absence of invasive non-native species and it will have well-developed edges with scattered scrub and tall grassland and/or herbs present between the scrub and adjacent habitats. There will be clearings, glades or rides within the scrub of the square parcel in the west. Therefore, this habitat will achieve a 'good' and 'moderate' condition.

Urban - Biodiverse Green Roof

Proposals have not been finalised at this stage, but using the Urban condition assessment criteria, vegetation structure on the biodiverse green roofs is likely to be varied, offering a diverse range of flowering plants and an absence of invasive non-native species. It is likely that the roof will have a varied depth of 80 - 150mm with at least at 150mm and planted and seeded with wildflowers and sedum, meeting the requirements of GRO Code 2014. Some additional habitat such as sand piles and logs will be present too. Therefore, this habitat will achieve a 'good' condition.

Urban - Developed Land; Sealed Surface (Buildings)

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

Urban - Developed Land; Sealed Surface (Hardstanding)

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

Urban - Urban Tree (Scattered Trees)

The client has confirmed a total of 28 trees are proposed on site, alongside the retained trees, with an approximate canopy area of 12.5m² per tree. Where trees are grouped together the tree canopy is continuous and less than 50% of trees are mature or veteran. Although the trees are thought to be pruned for aesthetic purposes, the trees are thought to retain 75% of their expected canopy for their age range and height. No management regime, encouraging micro habitats is in place. The trees are generally adjacent to other vegetation and the canopies oversailing vegetation beneath. The scattered trees therefore achieve a 'moderate' condition.

Assessment Criteria for the above habitats is given in Appendix C.

Proposed - Linear

Table 4.3 Linear Proposed Biodiversity Units

Hedgerow Type	Length (km)	Distinctiveness	Condition	Biodiversity Units
Hedge - Native	0.035	Low	Moderate	0.12

Linear biodiversity value is calculated as 0.12 units as set out in the table above.

Hedgerow - Native Hedgerow

Proposals have not been finalised at this stage, but a linear native hedge (line of mature shrubs one or two shrubs wide) is proposed in the west of the site. Using the hedgerow condition assessment sheet, the proposed hedgerow is likely to reach 1.5m in height, however it is unlikely to reach 1.5m in width. There is likely to be a gap of <0.5m and the hedge canopy is to be continuous with no gaps. There is not likely to be an area of undisturbed ground and perennial vegetation along its length, due to its location, however there will be a lack of undesirable perennial species present. More than 90% of its length will

be free from invasives, however less than 90% will be free from damage from anthropogenic activities. Therefore, the proposed hedgerow will achieve 'moderate' condition.

Assessment Criteria for the above habitats is given in Appendix C.

5.0 EVALUATION AND DISCUSSION

The headline results obtained from the Biodiversity Metric 3.1 are summarised in the table below.

Table 5.1 Headline Results

Status	Habitat/Hedgerow	Biodiversity Units
On-site baseline	Habitat units	2.95
	Hedgerow units	0.00
On-site post-intervention	Habitat units	3.25
	Hedgerow units	0.12
On-site net % change	Habitat units	8.56%
	Hedgerow units	100.00%
Total net unit change	Habitat units	0.30
	Hedgerow units	0.12
Total on-site net % change plus off-site surplus	Habitat units	10.13%
	Hedgerow units	100.00%

Under these proposals, and in the absence of additional enhancement measures and habitat creation, the development stands to result in a net gain of 0.25 biodiversity units associated with area-based habitats from pre-development levels. This corresponds to a total net increase of 10.13% in ecological value.

Hedgerow units have increased by 0.12 biodiversity units, although a percentage of zero can't be derived, the metric scores it as 100%.

The proposals are therefore not in compliance with local and national planning policy (see Appendix C).

Details on habitat enhancement and management to ensure delivery of BNG should be outlined in an Ecological Management Plan (EMP) and detailed landscaping plans, which could be secured through planning condition.

The EMP should provide description of how habitats are to be created and managed for a period of at least 30 years.

6.0 SUMMARY & CONCLUSION

Greengage was commissioned to undertake a Biodiversity Net Gain Assessment by Hawkins Brown of a site known as the Haringey Civic Centre in the London Borough of Haringey in order to assess the change in ecological value of the site in light of the proposed development.

This report demonstrates that the development proposals will result in a net gain of 0.30 biodiversity units should existing plans be adhered to, equivalent to a 10.13% increase in ecological value and is not compliant with the BNG Mandate which states a target of 10% net gain in biodiversity. Hedgerow units have increased by 0.12 biodiversity units, although a percentage of zero can't be derived, the metric scores it as 100%.

In addition to the calculated gain, other enhancements will be included, such as bat and bird boxes, biodiverse green roofs, invertebrate habitats, rain gardens and wildflower planting.

Details on any habitat creation and its ongoing management should be agreed with the Local Planning Authority and described in an EMP (secured by planning condition) for the site.

APPENDIX A LANDSCAPE PLAN/STRATEGY

APPENDIX B CONDITION ASSESSMENT CRITERIA

Broad Baseline Habitat Conditions

Urban - Developed Land; Sealed Surface (Hardstanding)

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

Urban - Developed Land; Sealed Surface (Buildings)

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

Grassland - Modified Grassland

	Condition Assessment Criteria	Pass (Majority)	Pass (Patch in SW)
1	There must be 6-8 species per m2. If a grassland has 9 or more species per m2 it should be classified as a medium distinctiveness grassland habitat type. NB - this criterion is essential for achieving moderate condition.	N	N
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	N	N
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Y	Y
4	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.	N	N
5	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	N - none	N *more than 10%
6	Cover of bracken less than 20%.	Y	Y
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Y	Y

Condition Assessment Result	Condition Assessment Score
Passes 6 or 7 of 7 criteria including passing essential criterion 1	Good (3)
Passes 4 or 5 of 7 criteria including passing essential criterion 1	Moderate (2)
Passes 0, 1, 2 or 3 of 7 criteria, OR 4, 5 or 6 of criteria but failing criterion 1	Poor (1)

Urban - Introduced Shrub

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

Urban - Urban Tree (Scattered Trees)

	Condition Assessment Criteria	Score
1	The tree is a native species (or more than 70% within the block are native species).	N
2	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
3	The tree is mature or veteran (or more than 50% within the block are mature or veteran3).	N
4	There is little or no evidence of an adverse impact on tree health by anthropogenic activities such as vandalism or herbicide use. There is no current regular pruning regime so the trees retain >75% of expected canopy for their age range and height.	Y
5	Micro-habitats for birds, mammals and insects are present e.g. presence of deadwood, cavities, ivy or loose bark	N
6	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 0, 1 or 2 of 6 criteria	Poor (1)

Urban - Vacant/derelict land/ bareground

	Condition Assessment Criteria	Pass
CORE CRITERIA - applicable to all urban habitat types:		
1	Vegetation structure is varied, providing opportunities for insects, birds and bats to live and breed. A single ecotone (i.e. scrub, grassland, herbs) should not account for more than 80% of the total habitat area.	N
2	There is a diverse range of flowering plant species, providing nectar sources for insects. These species may be either native, or non-native but beneficial to wildlife. NB - To achieve GOOD condition, criterion 2 must be satisfied by native species only (rather than non-natives beneficial to wildlife). Note that Biodiverse green roofs are exempt from this requirement, and can include non-native sedums, as set out in footnote 1.	N
3	Invasive non-native species (Schedule 9 of WCA) cover less than 5% of total vegetated area. NB - To achieve GOOD condition, criterion 3 must be satisfied by a complete absence of invasive non-native species (rather than <5% cover)2.	Y
ADDITIONAL CRITERION - only applicable to Open mosaic on previously developed land habitat type:		
4a	The site shows spatial variation, forming a mosaic of at least four early successional communities (a) to (h) PLUS bare substrate AND pools. (a) annuals; (b) mosses/liverworts; (c) lichens; (d) ruderals; (e) inundation species; (f) open grassland; (g) flower-rich grassland; (h) heathland.	N/A
ADDITIONAL CRITERION - only applicable to Bioswale and SUDS habitat types:		

	Condition Assessment Criteria	Pass
4b	The water table is at or near the surface throughout the year. This could be open water or saturation of soil at the surface.	N/A
4c1	Intensive green roofs – have a minimum of 50% native and non-native wildflowers - 70% of the roof area is soil and vegetation (including water features)	N/A
4c2	Biodiverse green roofs - have a varied depth of 80 - 150mm at least 50% is at 150mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. To achieve Good condition some additional habitat, such as sand piles, logs etc should be present.	N/A

Condition Assessment Result	Condition Assessment Score
If 3 criteria assessed:	
Passes 3 of 3 core criteria; AND Meets the requirements for good condition within criteria 2 and 3	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 criteria 2 and 3	Moderate (2)
Passes 0 or 1 of 3 core criteria	Poor (1)

Broad Post-Development Habitat Conditions

Urban - Rain Garden

	Condition Assessment Criteria	Pass
CORE CRITERIA - applicable to all urban habitat types:		
1	Vegetation structure is varied, providing opportunities for insects, birds and bats to live and breed. A single ecotone (i.e. scrub, grassland, herbs) should not account for more than 80% of the total habitat area.	Y
2	There is a diverse range of flowering plant species, providing nectar sources for insects. These species may be either native, or non-native but beneficial to wildlife. NB - To achieve GOOD condition, criterion 2 must be satisfied by native species only (rather than non-natives beneficial to wildlife). Note that Biodiverse green roofs are exempt from this requirement, and can include non-native sedums, as set out in footnote 1.	Y
3	Invasive non-native species (Schedule 9 of WCA) cover less than 5% of total vegetated area. NB - To achieve GOOD condition, criterion 3 must be satisfied by a complete absence of invasive non-native species (rather than <5% cover)2.	Y
ADDITIONAL CRITERION - only applicable to Open mosaic on previously developed land habitat type:		
4a	The site shows spatial variation, forming a mosaic of at least four early successional communities (a) to (h) PLUS bare substrate AND pools. (a) annuals; (b) mosses/liverworts; (c) lichens; (d) ruderals; (e) inundation species; (f) open grassland; (g) flower-rich grassland; (h) heathland.	N/A
ADDITIONAL CRITERION - only applicable to Bioswale and SUDS habitat types:		
4b	The water table is at or near the surface throughout the year. This could be open water or saturation of soil at the surface.	N/A
4c1	Intensive green roofs – have a minimum of 50% native and non-native wildflowers - 70% of the roof area is soil and vegetation (including water features)	N/A
4c2	Biodiverse green roofs - have a varied depth of 80 - 150mm at least 50% is at 150mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. To achieve Good condition some additional habitat, such as sand piles, logs etc should be present.	N/A

Condition Assessment Result	Condition Assessment Score
If 3 criteria assessed:	
Passes 3 of 3 core criteria; AND Meets the requirements for good condition within criteria 2 and 3	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 criteria 2 and 3	Moderate (2)
Passes 0 or 1 of 3 core criteria	Poor (1)
If 4 criteria assessed:	
Passes 3 of 3 core criteria; AND Meets the requirements for good condition within criteria 2 and 3; AND Passes additional criterion 4a or 4b	Good (3)
Passes 2 of 3 of 4 criteria; OR Passes 4 of 4 criteria but does not meet the requirements for good condition within criteria 2 and 3	Moderate (2)
Passes 0 or 1 of 4 criteria	Poor (1)

Grassland - Modified Grassland

	Condition Assessment Criteria	Pass
1	There must be 6-8 species per m2. If a grassland has 9 or more species per m2 it should be classified as a medium distinctiveness grassland habitat type. NB - this criterion is essential for achieving moderate condition.	Y
2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	N
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Y
4	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.	N
5	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	N
6	Cover of bracken less than 20%.	Y
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Y

Condition Assessment Result	Condition Assessment Score
Passes 6 or 7 of 7 criteria including passing essential criterion 1	Good (3)

Condition Assessment Result	Condition Assessment Score
Passes 4 or 5 of 7 criteria including passing essential criterion 1	Moderate (2)
Passes 0, 1, 2 or 3 of 7 criteria, OR 4, 5 or 6 of criteria but failing criterion 1	Poor (1)

Urban - Introduced Shrub (Flower-rich perennial planting)

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

Heathland and scrub - Mixed scrub

Condition Assessment Criteria		Condition Achieved?
1	Habitat is representative of UKHab description (where in its natural range). There are at least three woody species, with no one species comprising more than 75% of the cover (except common juniper, sea buckthorn or box, which can be up to 100% cover).	Y
2	There is a good age range – all of the following are present: seedlings, young shrubs and mature shrubs.	Y
3	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981) and species indicative of sub-optimal condition make up less than 5% of ground cover.	Y
4	The scrub has a well-developed edge with scattered scrub and tall grassland and/or herbs present between the scrub and adjacent habitat(s).	N for all except Y for square area totalling 0.015ha
5	There are clearings, glades or rides present within the scrub, providing sheltered edges.	N for all except Y for square area totalling 0.015ha

Condition Assessment Result	Condition Assessment Score
Passes 5 of 5 criteria	Good (3)
Passes 3 or 4 of 5 criteria	Moderate (2)
Passes 0, 1 or 2 of 5 criteria	Poor (1)

Urban - Biodiverse Green Roof

Condition Assessment Criteria		Pass
CORE CRITERIA - applicable to all urban habitat types:		
1	Vegetation structure is varied, providing opportunities for insects, birds and bats to live and breed. A single ecotone (i.e. scrub, grassland, herbs) should not account for more than 80% of the total habitat area.	Y
2	There is a diverse range of flowering plant species, providing nectar sources for insects. These species may be either native, or non-native but beneficial to wildlife. NB - To achieve GOOD condition, criterion 2 must be satisfied by native species only (rather than non-natives beneficial to wildlife). Note that Biodiverse green roofs are exempt from this requirement, and can include non-native sedums, as set out in footnote 1.	Y
3	Invasive non-native species (Schedule 9 of WCA) cover less than 5% of total vegetated area. NB - To achieve GOOD condition, criterion 3 must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	Y
ADDITIONAL CRITERION - only applicable to Open mosaic on previously developed land habitat type:		
4a	The site shows spatial variation, forming a mosaic of at least four early successional communities (a) to (h) PLUS bare substrate AND pools. (a) annuals; (b) mosses/liverworts; (c) lichens; (d) ruderals; (e) inundation species; (f) open grassland; (g) flower-rich grassland; (h) heathland.	N/A
ADDITIONAL CRITERION - only applicable to Bioswale and SUDS habitat types:		
4b	The water table is at or near the surface throughout the year. This could be open water or saturation of soil at the surface.	N/A
4c1	Intensive green roofs – have a minimum of 50% native and non-native wildflowers - 70% of the roof area is soil and vegetation (including water features)	N/A
4c2	Biodiverse green roofs - have a varied depth of 80 - 150mm at least 50% is at 150mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. To achieve Good condition some additional habitat, such as sand piles, logs etc should be present.	Y

Condition Assessment Result	Condition Assessment Score
If 3 criteria assessed:	
Passes 3 of 3 core criteria; AND Meets the requirements for good condition within criteria 2 and 3	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 criteria 2 and 3	Moderate (2)
Passes 0 or 1 of 3 core criteria	Poor (1)
If 4 criteria assessed:	
Passes 3 of 3 core criteria; AND Meets the requirements for good condition within criteria 2 and 3; AND Passes additional criterion 4a or 4b	Good (3)
Passes 2 of 3 of 4 criteria; OR Passes 4 of 4 criteria but does not meet the requirements for good condition within criteria 2 and 3	Moderate (2)
Passes 0 or 1 of 4 criteria	Poor (1)

Urban - Developed Land; Sealed Surface (Buildings)

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

Urban - Developed Land; Sealed Surface (Hardstanding)

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

Urban - Urban Tree (Scattered Trees)

	Condition Assessment Criteria	Score
1	The tree is a native species (or more than 70% within the block are native species).	N
2	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
3	The tree is mature or veteran (or more than 50% within the block are mature or veteran ³).	N
4	There is little or no evidence of an adverse impact on tree health by anthropogenic activities such as vandalism or herbicide use. There is no current regular pruning regime so the trees retain >75% of expected canopy for their age range and height.	Y
5	Micro-habitats for birds, mammals and insects are present e.g. presence of deadwood, cavities, ivy or loose bark	N
6	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 0, 1 or 2 of 6 criteria	Poor (1)

Linear Post-Development Habitat Conditions

Hedgerow - Native Hedgerow

Condition Assessment Criteria				
A series of ten attributes, representing key physical characteristics, are used for this assessment. The attributes, and the minimum criteria for achieving a favourable condition in each, are defined. The attributes use similar favourable condition criteria to the Hedgerow Survey Handbook and the handbook is the recommended source of reference for assessing individual hedgerow attributes.				
Functional Groupings	Attribute	Criteria (the minimum requirements for 'favourable condition')	Description	Pass
Core groups - applicable to all hedgerow types				
A1	Height	>1.5 m average along length	The average height of woody growth estimated from base of stem to the top of shoots, excluding any bank beneath the hedgerow, any gaps or isolated trees. Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice). A newly planted hedgerow does not pass this criterion (unless it is > 1.5 m height).	Y
A2	Width	>1.5 m average along length	The average width of woody growth estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths (e.g. blackthorn suckers) are only included in the width estimate when they >0.5 m in height. Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice4).	N
B1	Gap - hedge base	Gap between ground and base of canopy <0.5 m for >90% of length (unless 'line of trees')	This is the vertical gappiness of the woody component of the hedgerow, and its distance from the ground to the lowest leafy growth. Certain exceptions to this criterion are acceptable (see page 65 of the Hedgerow Survey Handbook).	Y
B2	Gap - hedge canopy continuity	Gaps make up <10% of total length and No canopy gaps >5 m	This is the horizontal gappiness of the woody component of the hedgerow. Gaps are complete breaks in the woody canopy (no matter how	Y

Condition Assessment Criteria				
			small). Access points and gates contribute to the overall gappiness, but are not subject to the >5 m criterion (as this is the typical size of a gate).	
C1	Undisturbed ground and perennial vegetation	>1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: - measured from outer edge of hedgerow, and - is present on one side of the hedge (at least)	This is the level of disturbance (excluding wildlife disturbance) at the base of the hedge. Undisturbed ground should be present for at least 90% of the hedgerow length, greater than 1m in width and must be present along at least one side of the hedge. This criterion recognises the value of the hedge base as a boundary habitat with the capacity to support a wide range of species. Cultivation, heavily trodden footpaths, poached ground etc. can limit available habitat niches.	N
C2	Undesirable perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground	The indicator species used are nettles (<i>Urtica</i> spp.), cleavers (<i>Galium aparine</i>) and docks (<i>Rumex</i> spp.). Their presence, either singly or together, should not exceed the 20% cover threshold.	Y
D1	Invasive and neophyte species	>90% of the hedgerow and undisturbed ground is free of invasive non-native and neophyte species	Neophytes are plants that have naturalised in the UK since AD 1500. For information on neophytes see the JNCC website and for information on invasive non-native species see the GB Non-Native Secretariat website.	Y
D2	Current damage	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities	This criterion addresses damaging activities that may have led to or lead to deterioration in other attributes. This could include evidence of pollution, piles of manure or rubble, or inappropriate management practices (e.g. excessive hedge cutting).	N

Condition Assessment Result		
Each attribute is assigned to one of 5 functional groups (A-E), as indicated in the table above, and the condition of a hedgerow is assessed according to the number of attributes from these functional groups with pass or fail the 'favourable condition' criteria according to the approach set out in this table.		
Category	Maximum number of attributes that can fail to meet 'favourable condition' criteria in Table TS1-2	Weighting (score)
Condition categories for hedgerows without trees		

Condition Assessment Result		
Good	No more than 2 failures in total; AND No more than 1 in any functional group.	3
Moderate	No more than 4 failures in total; AND Does not fail both attributes in more than one functional group (e.g. fails attributes A1, A2, B1 & C2 = Moderate condition).	2
Poor	Fails a total of more than 4 attributes; OR Fails both attributes in more than one functional group (e.g. fails attributes A1, A2, B1 & B2 = Poor condition).	1

APPENDIX C LEGISLATION AND POLICY

C.1 LEGISLATION

The Environment Act, 2021⁴

The Environment Act, 2021 mandates 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.

C.2 POLICY

National

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) 2021⁵ 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 Plan⁶

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

1. 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.
2. 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).
3. 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

4. Sites of Importance for Nature Conservation (SINCs) should be protected.
5. 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.
6. 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.
7. 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.
8. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

1. 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.
2. 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
3. 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 2018⁷

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”.

C.3 LOCAL

Haringey New Local Plan (2022 - 2037)

Haringey's development plan is currently made up of the Strategic Policies, Development Management Policies, Site Allocations and Tottenham Area Action Plan, alongside the London Plan. The council is currently preparing 2 additional plans, the Wood Green Area Action Plan, and the North London Waste Plan. Once adopted, these will form part of the development plan.

The council has started work on a new Local Plan.

- The Local Plan is a document that sets out a long-term vision and objectives for future development of the borough. It also contains a spatial strategy and policies to enable significant growth such as new homes, employment, leisure and cultural facilities and infrastructure, while protecting and enhancing our heritage and natural environment. The Local Plan is used to decide planning applications. This New Local Plan will cover the period 2022-2037.
- We need to ensure the Local Plan is up to date so that we continue to have a robust basis for deciding planning applications that supports our overall aspirations. There are six key reasons why we are doing this now:

- Be in conformity with the New London Plan;
- Take into account changes to National Planning Policy and Guidance;
- Respond to housing challenges;
- Respond to the Climate Emergency;
- Support recovery and renewal from Covid-19; and
- Help implement the priorities of the New Borough Plan 2019-2023

Green Infrastructure and the Natural Environment

The New Local Plan should look to enhance and protect biodiversity and open spaces. The borough's green infrastructure also has a crucial role to play in helping Haringey to adapt to our warming climate and meet carbon reduction targets. Trees in particular play an important role in carbon capture and storage, preventing flooding, reducing pollution and reducing city temperature.

Below are some ideas for improving the Local Plan to enhance and protect our natural environment:

- a. Continue to protect and improve our parks and open spaces
- b. Continue to protect and enhance biodiversity at designated and non-designated sites with additional emphasis on achieving net gains in biodiversity and linking habitats to create ecological corridors
- c. Consider the potential to designate new sites as Local Nature Reserves including The Paddock in Tottenham Hale
- d. Explore whether it is possible to deliver additional open space in areas with existing deficiencies, particularly in the east of the borough
- e. Provide opportunities for people to access wildlife and diverse open green spaces through policies to enhance cycling and walking routes, and through further establishing green links between existing open spaces
- f. Whilst it is our clear aim to ensure there is no net loss of open space, the New Local Plan could support re-arranging open space such as Metropolitan Open Land to enable improvements in parts of the borough where there is currently a lack of access to quality open spaces
- g. Set a local Urban Greening Factor, which will apply to new developments and will be achieved through measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage
- h. Support opportunities to secure increased allotment space as well as encouraging urban farming, hydroponic farming and rooftop farming, which can supply food, improve the environment and create jobs.

SP13: Open Space and Biodiversity

New development shall protect and improve Haringey's parks and open spaces. All new development shall:

-
- Protect and enhance, and when and where possible, extend the existing boundaries of the borough's Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development;
 - Provide amenity space in accordance with the Council's Open Space and Recreational Standards Supplementary Planning Document (SPD);
 - Manage the impact of such new developments in areas adjacent to designated open space;
 - Secure improvements, enhancement and management in both quality and access to existing green spaces;
 - Seek on-site or financial contributions towards open space from new developments as set out in the Open Space and Recreational Standards SPD;
 - Seek to secure opportunities for additional publicly accessible open space especially in those identified areas of Open Space deficiency e.g. in the east of the borough where the quality and amount of provision is poorer as set out in the Council's Open Space and Recreational Standards SPD; and
 - Conserve the historic significance of the borough's designated historic parks and gardens.

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