13th August 2024

George Clarke
Croydon Council

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Croydon Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: 24/02402/FUL
Location: 53A Warminster Road, South Norwood, London, SE25 4DQ
Proposal: Erection of a two storey side addition providing two flats with associated site alterations.

Dear George,

Thank you for consulting Place Services on the above outline application.

Holding objection due to insufficient ecological information on mandatory biodiversity net gain

Summary

We have assessed the submitted documents for this application, including the Biodiversity Small Sites Metric, the Biodiversity Gain Plan and the Baseline and proposed post-development Plans (Joe Blooms, 2024) relating to mandatory biodiversity net gains.

We note no information has been submitted in relation to the potential for roosting bats to be present within this listed building, or affected by the proposals. However, the proposed levels do not appear to impact the roof or any other structures which may support roosting bats. As such we are satisfied no further information on bats is required. This provides the LPA with certainty of likely impacts upon protected and Priority species.

However, we are not satisfied that sufficient information has been provided prior to determination, due to insufficient information on Biodiversity Net Gain.

This is because no photos have been submitted to help the LPA review the habitats outlined within the Small Sites Metric. There are a few photographs that can be seen in the Arboricultural report, and a plan in the Arboricultural report which shows boundary trees and vegetation. The boundary trees / vegetation

has not been shown on the BNG baseline or post-development plans, nor has this vegetation been taken into account in the metric. Therefore, it is recommended that further justification should be provided to confirm why this is the case.

Biodiversity net gains is a statutory requirement set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990 and we are therefore not satisfied that the submitted information provides sufficient information at application stage. This information needs to be updated to provide:

- Suitable photographs of the site to show each of the habitat types shown in the baseline plans / on the small sites metric.
- The boundary vegetation must be included within the baseline maps and small sites metric calculations, unless reasonable justification can be provided to explain why this is not required.

The planning authority will be required to secure a biodiversity gain condition as a pre-commencement requirement. The biodiversity gain condition has its own separate statutory basis, as a planning condition under paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990. As a result, government have recommended that it is not included in the list of conditions imposed in the written notice when granting planning permission. However, it is highlighted that biodiversity gain condition could be implemented via a separate section of the decision notice. The biodiversity gain condition should secure the provision of a Biodiversity Gain Plan, as well as the finalised full Small Sites Metrics or Statutory Biodiversity Metric – Calculation Tool (if off-site measures is required).

It is highlighted that we would expect the following measures to be addressed as part of the biodiversity gain condition:

- The key requires updating as there are two circles in the post-development plan which are not explained.
- Off-site net gains will likely be required to achieve a 10% net gain on site. Therefore, measures to demonstrate how this will be achieved should be stated within the biodiversity gain plan.

It is highlighted that the use of green roofs / walls can be used on bin and cycle stores to provide an uplift in on-site BNG credits.

In addition, a Habitat Management and Monitoring Plan should be secured for all significant on-site enhancements, as well as off-site enhancements. This should be in line with the approved Biodiversity Gain Plan, with the maintenance and monitoring secured via legal obligation or a condition of any consent for a period of up to 30 years. The monitoring of the post-development habitat creation / enhancement will need be provided to the LPA at years 2, 5, 10, 15, 20, 25, 30 any remedial action or adaptive management will then be agreed with the LPA to ensure the aims and objectives of the Biodiversity Gain Plan are achieved

Reasonable biodiversity enhancements for protected and Priority species should also be recommended to secure net gains for biodiversity, as outlined under Paragraph 180d and 186d of the National Planning Policy Framework (December 2023). Reasonable biodiversity enhancement measures should be outlined within a separate Biodiversity Enhancement Layout which can be secured by a condition of any consent. Enhancements may include bat boxes / access tiles, bird nest boxes, bee bricks etc.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely

Lucy Addison MSc BSc (Hons) ACIEEM
Senior Ecological Consultant
Place Services at Essex County Council

Place Services provide ecological advice on behalf of Croydon Council
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.