

Green Infrastructure Memo: Stage 1 consultation

100 CHALK FARM ROAD**14/03/2024**

To / Case officer:	
From:	
Case name:	100 Chalk Farm Road
London Borough:	Camden
Case number:	2024/0108/S1
Outline/Full:	Full

Applicant:	Regal Chalk Farm Limited
Landscape Plan:	Illustrative masterplan (Pg. 161, 168 & 172 DAS)
DAS:	100 Chalk Farm Road Design and Access Statement

Overview of assessment

The applicant is requested to provide additional information in relation to green infrastructure policy. The following is requested prior to Stage 2:

- Review of Urban Greening Factor score in relation to target UGF 0.4 for residential development;
- Review of inclusion of green walls against fire safety guidance;
- Justification for trading rules not met; and
- Further demonstration that the value of trees retained and proposed outweighs the value of the current tree stock.

Proposal

Demolition of existing buildings and redevelopment of the site to provide two new buildings of between 6-12 storeys: one containing affordable homes (Class C3) and one (with three cylindrical volumes) containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), a ground floor commercial space (Class E) together with public realm, access, plant installation, and other associated works.

Policy Review

Open Space - London Plan Policy G4: Local Green and Open Space

1. The applicant demonstrates consideration of access to public open space across the site, including new accessible public realm spaces with greening incorporating meeting and rest spaces, community amenity space at podium level with play facilities, and activity space at roof level in accordance with London Plan Policy G4. This is particularly important as the site is located in an area identified as being deficient in public open space within the London Green Infrastructure Focus Map, further information can be found here: <https://data.london.gov.uk/dataset/green-infrastructure-focus-map>

Biodiversity - London Plan Policy G6: Biodiversity and Access to Nature

2. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied.
3. It is recommended the applicant should provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D). If biodiversity net gain is not achievable on the site, the applicant should review opportunities for biodiversity offsetting in consultation with the borough.
4. The applicant states, within the Biodiversity Impact Assessment, that the proposed scheme results in an 237.12% biodiversity net gain (pg. 13) when assessed using the statutory metric which exceeds the mandatory 10% for compliance with Policy G6. Trading rules have not been satisfied due to a loss of 0.10HU of broadleaved woodland. The applicant should provide robust justification for this.
5. Recommendations in the Ecological Impact Assessment should be implemented or robust justification should be given as to why they cannot be. The applicant should prepare an Ecological Management Plan (EMP) to support long-term maintenance and habitat creation. The EMP should be secured by planning condition and approved, if the proposed development is granted planning consent.

Green Infrastructure and Urban Greening - London Plan Policy G1: Green Infrastructure and London Plan Policy G5: Urban Greening

6. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan. This includes the incorporation of intensive green and blue roof alongside rain gardens and flower-rich perennial planting which supports multifunctionality, in accordance with Policy G1 of the London Plan. The opportunity for the provision of biosolar roofing should be explored.
7. The applicant also links to the wider green infrastructure network through the inclusion of new public realm at ground level along Chalk Farm Road.

8. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.33 (pg. 179 DAS), which is below the target set by Policy G5 of the London Plan for residential developments of 0.4. Whilst there are many positive design features embedded in the Scheme, the applicant should review the urban greening proposed, seeking to improve the quality or quantity, to increase the application's UGF. Features for consideration may include increased planting at ground level. If the target score cannot be achieved, the applicant should set out robust justification.
9. London Plan Guidance on Fire Safety restricts the use of combustible materials in the external walls of a building, limiting the use of green walls. The proposed urban greening should therefore be reviewed against this guidance and updated as appropriate. Where this review finds it necessary to remove a green wall, opportunities should be sought to make up any reduction in the UGF score by improving the quality or quantity of greening across the wider masterplan. For further information see: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/fire-safety-lpg>

Trees - London Plan Policy G7: Trees and Woodlands

10. The Arboricultural Impact Assessment states that there are no notable trees on site. (pg. 10), all notable trees are located outside the site boundary. Trees proposed for removal include one category C tree (pg. 16). The Scheme proposes 18 new trees.
11. Wherever possible, trees of value should be retained. The applicant should provide an assessment of the value of the trees to be lost using the appropriate valuation system and calculate how this has been accounted for through an assessment of the value of replacement tree planting within a reasonable timescale, such as 15-20 years to allow proposed trees to establish and mature. Tree value can be derived from 'i-tree' or 'CAVAT', or another appropriate valuation system, in accordance with Policy G7 of the London Plan. Without this valuation comparison, compliance with Policy G7 cannot be demonstrated.
12. Recommendations in the Arboricultural Impact Assessment should be adhered to, or robust justification should be given as to why they cannot be.
13. The applicant appears to demonstrate a consideration of a diverse range of proposed tree species, which is positive in terms of biosecurity and should be brought to fruition. The applicant should also consider large-canopied trees to target urban heat island (UHI) effects as the site is identified within the London Green Infrastructure Focus Map as within an area of medium to high-risk areas for UHI. Further information can be found here: <https://data.london.gov.uk/dataset/green-infrastructure-focus-map>.