

## **Review of the Royal Borough of Kensington and Chelsea’s “Impact of Basement Development on Biodiversity”**

### **Executive Summary**

- **Impact of Basement Development on Biodiversity**
- Biodiversity does not provide any basis for limiting the depth of basement development.
- RBKC fails to provide any evidence that basements are a significant part of the decline in vegetated area within London.
- Correctly acknowledges that the benefit of a garden to wildlife depends on composition of the garden, but then overlooks opportunities for habitat enhancement offered by changing garden composition with basement developments.
- Overstates the degree of hazard, level of impact and duration of impacts on biodiversity presented by basement developments;
- Overstates significance by failing to clarify impacts on species covered by wildlife legislation, Species of Principle Importance for Conservation in England or local BAP species;
- Presumes that large trees cannot be grown in 1m of soil depth without presenting evidence of this assertion;
- Includes effects on drainage that are not a biodiversity impact;
- Presumes that impacts cannot be adequately avoided, mitigated or compensated for.
- The “Impact of Basement Development on Biodiversity” thus does not provide any evidence that basement developments have reduced biodiversity, nor identify significant potential impacts that cannot be adequately mitigated for under present policy. The report also fails to identify the opportunities for biodiversity enhancement that can be achieved under present policy. Thus there is no reasonable justification from biodiversity for further limiting the extent or depth of basement developments.