MKA
ECOLOGY

Biodiversity Gain Plan
and Urban Greening Factor Review

Saffron Hill, Farringdon

Site	*Saffron Hill, Farringdon*
Project number	*147523*
Client name / Address	*Saffron Hill Investment Holdings Limited, c/o Guardian Trust Guardian Trust Company Limited (Tortola), Geneva Place – 2nd Floor, 333 Waterfront Drive, Road Town, Tortola, British Virgin Islands*

Version number	**Date of issue**	**Revisions**
1.0	*11 December 2023*	*Original*
2.0	*14 February 2024*	*Minor edits to landscaping plan and BNG/UGF scores*

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Declaration of compliance

The information which we have provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

We are a Chartered Institute of Ecology and Environmental Management (CIEEM) Registered Practice. All of our ecologists are members of CIEEM and between them carry licences for the majority of protected species.

Validity of data

Unless stated otherwise the information provided within this report is valid for a maximum period of 24 months from the date of survey. If works at the site have not progressed by this time an updated site visit may be required in order to determine any changes in site composition and ecological constraints.

This report contains recommendations on measures for how this project might deliver Biodiversity Net Gain. These recommendations do not constitute a design for Biodiversity Net Gain. In submitting these recommendations, MKA Ecology has no Design Liability associated with these recommendations for Biodiversity Net Gain.

CONTENTS

1. EXECUTIVE SUMMARY

In September 2023 MKA Ecology Limited was commissioned to undertake a Biodiversity Net Gain (BNG) assessment and Urban Greening Factor (UGF) Review of Saffron Hill, Farringdon. This Biodiversity Net Gain Plan has been prepared to detail how the biodiversity enhancements in the proposed scheme will lead to an overall benefit to biodiversity. In addition, a UGF has also been calculated. This factor has been developed for London to encourage greening of new developments and a greening value is calculated from the proposed scheme.

The Site, which covers a total of 0.14 hectares, comprises a single multi-level multistorey car park building with a two-storey brick-built office extension on the upper floor. The proposals involve the demolition of the existing car park and offices and erection of a new building providing Class E Commercial floorspace and flexible Class E café/restaurant space along with associated landscaping and works, including the provision of extensive biodiverse green roofing, climbing plants and landscaped terrace balconies.

To provide an objective assessment of the potential value of the proposed biodiversity enhancements, the Defra Statutory Biodiversity Metric (Defra, 2023) has been applied. The measures, a proxy for biodiversity that uses habitat types and their areas, have compared the state of the Site before (the existing condition) and after the completion of the proposed development. A UGF has also been applied to the proposed development following the methodology developed in the London Plan (Greater London Authority, 2021).

This assessment exercise has calculated that the proposed development is likely to lead to a net gain 0.28 biodiversity units, provided that these habitats are created, managed and maintained appropriately and in line with a detailed management plan, as required under the Environment Act 2021. As the baseline value of the Site is negligible, this constitutes a net gain percentage of 100% in habitat units within the metric. Trading rules have also been met for area habitats. A net gain percentage for hedgerow units and river units has not been calculated as no hedgerows or watercourses are present within the Site prior to development and none are proposed within the current design proposals.

It should be noted that the predicted net-gain in biodiversity is reliant on the successful creation of habitats and their maintenance for the foreseeable future. It will be critical to ensure that appropriate management activities are put in place in order to achieve the desired condition of the proposed habitats.

It is recommended that measures to ensure the successful creation and long-term management of proposed habitats are outlined in a Landscape and Ecology Management Plan (LEMP) for the Site.

The UGF score for the proposed development is 0.30. The London Plan sets out score requirements of 0.30 for predominantly commercial developments; the current development proposals therefore meet this target.

In addition to the targets for BNG and the UGF, further ecological features, such as bird boxes, bat boxes and an invertebrate hotel, have been recommended for the development. Whilst not considered within the current metrics, these features will further enhance the Site for priority species and help deliver a sustainable development.

2. INTRODUCTION

2.1. Purpose

This Biodiversity Net Gain Plan is submitted for the approval of the London Borough of Camden to show how a 10% net gain for biodiversity will be achieved as required by the LPA.

The purpose of this assessment is to review the existing biodiversity value of Saffron Hill, Farringdon, comparing this to the proposed landscape masterplan and calculate an overall biodiversity net change for the Site. The primary method of calculating this change is through a Biodiversity Net Gain (BNG) assessment, which follows the Defra Statutory Biodiversity Metric (Defra, 2023). As stated within the Environment Act (2021), BNG assessments must be accompanied by a Biodiversity Gain Plan (BGP) as part of the planning application. The aims of this BGP are to cover:

- The pre-development biodiversity value of the onsite habitat;
- The post-development biodiversity value of the onsite habitat; and,
- The biodiversity value of any offsite habitat provided in relation to the development.

The process of achieving and assessing Biodiversity Net Gain should follow the below principles and rules, as set out within *Biodiversity Net Gain, Good Practice Principles for Development* (Baker *et al*., 2019) (Table 1) and *The Statutory Biodiversity Metric – User Guide (draft)* (Defra, 2023) (Table 2).

This Biodiversity Net Gain Plan is in line with British Standard BS8683.

Table 1: The UK's good practice principles for biodiversity net gain (Baker *et al.*, 2019)

Principle	In practice
1. Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
2. Avoid losing biodiversity that cannot be offset elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve NNL/net gain.
3. Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to net gain. Achieve net gain in partnership with stakeholders where possible.
4. Address risk	Mitigate difficulty, uncertainty and other risks to achieving net gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between losses occurring and gains being fully realised.

Principle	In practice
5. Make a measurable net gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
6. Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly-justified choices when: • Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses • Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation • Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels • Enhancing existing or creating new habitat • Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity
7. Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).
8. Create a Net Gain legacy	Ensure Net Gain generates long-term benefits by: • Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity • Planning for adaptive management and securing dedicated funding for long-term management • Designing Net Gain for biodiversity to be resilient to external factors, especially climate change • Mitigating risks from other land uses • Avoiding displacing harmful activities from one location to another and • Supporting local-level management
9. Optimise sustainability	Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

Table 2: Biodiversity net gain rules (Defra, 2023)

Rule	In practice
1	The trading rules of this biodiversity metric must be followed.
2	Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.
3	To accurately apply the biodiversity metric formula, you must use the biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.
4	In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.

In addition, UGF has been calculated based on the methodologies set out in the London Plan (Greater London Authority, 2021). The UGF is a tool to evaluate the quality and quantity of urban greening. It

enables developments to demonstrate how they have included urban greening as a fundamental element of site and building design in order to meet the criteria of Policy G5 Urban Greening of the London Plan. The Plan sets out score requirements of 0.4 for predominantly residential and 0.3 for predominantly commercial developments. This applies to major developments applications proposing additional floorspace of at least 1,000m^2 or a site area of at least one hectare. The current development proposal does not meet the criteria for a major development, therefore in this case the UGF target scores should be used as a comparison to demonstrate how the development is maximising soft landscaping within the constraints of a small site.

2.2. Site description and context

The Site is shown on the map in Figure 1. Within this report this area is referred to as the Site or Saffron Hill, Farringdon. It is located in central London to the west of Farringdon station, (centred on National Grid Reference TQ 31430 81934) and falls under the local authority of the London Borough of Camden. The Site comprises a multi-level multistorey car park with a two-storey brick-built office extension on the 6th floor. The landscape surrounding the Site is dominated by buildings, associated hardstanding and roads, with very limited greenspace.

2.3. Proposed development

The proposed development is shown on the map in Figure 2, Figure 3 and Figure 4. The proposed development involves the demolition of existing car park and offices, and erection of a new building providing Class E Commercial floorspace and flexible Class E café/restaurant space, along with associated landscaping and works, including the provision of green walls, raised planters and a green roof.

3. HABITATS

3.1. Present – baseline condition survey

The Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA), carried out by MKA Ecology Ltd on 05 October 2023 (MKA Ecology Ltd, 2023), identified that the Site comprises a multistorey car park with a two-storey office extension on the upper floors with limited ecological value in its current form. The habitats at the Site were mapped during the PEA and are presented in Figure 1. The areas occupied by each habitat type are detailed in Table 4 in the next section.

Given the lack of vegetated habitats within the Site, a condition assessment of the baseline habitats was not applicable, with all the existing habitats automatically assigned a condition within the Biodiversity Metric. More information on how habitat conditions were assigned is provided in Appendix 11.

There are no irreplaceable habitats within the redline boundary. Please note that any impacts on designated sites and protected species that may result from the development have been addressed in the PEA, which also outlines plans for mitigation and enhancement, where required (MKA Ecology Ltd, 2023).

3.2. Future – proposed landscape and enhancements

The proposed development is for the demolition of the existing building to create a multistorey building providing Class E Commercial floorspace and flexible Class E café/restaurant space, along with associated landscaping works.

Landscaping works include the provision of green walls, raised planters and tree planting on the terrace balconies and ground floor, and the creation of a biodiverse green roof. The areas of the proposed habitats were provided by MRG Studio. The proposed landscaping plans are presented within Figure 2, Figure 3 and Figure 4 below, and it is these proposed habitats that will form the basis of the calculation of ‘net-change’ in biodiversity using the Defra metric and the calculation of the UGF value based on the methodology set out in the London Plan.s

Figure 1: Baseline habitats at Saffron Hill, Farringdon

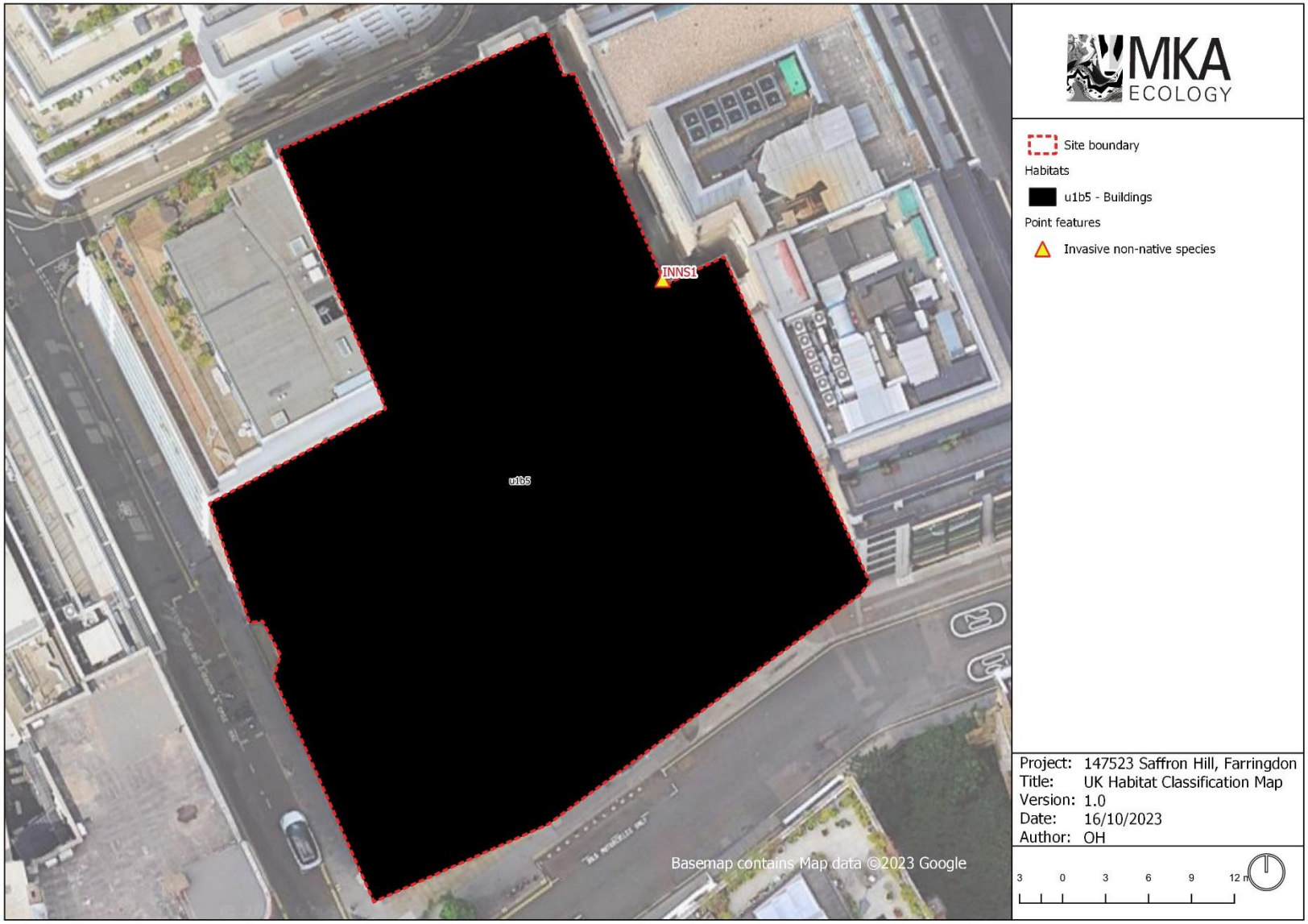


Figure 2: Proposed landscaping plans at Saffron Hill, Farringdon – Ground floor (plan courtesy of MRG Studio, 2024)

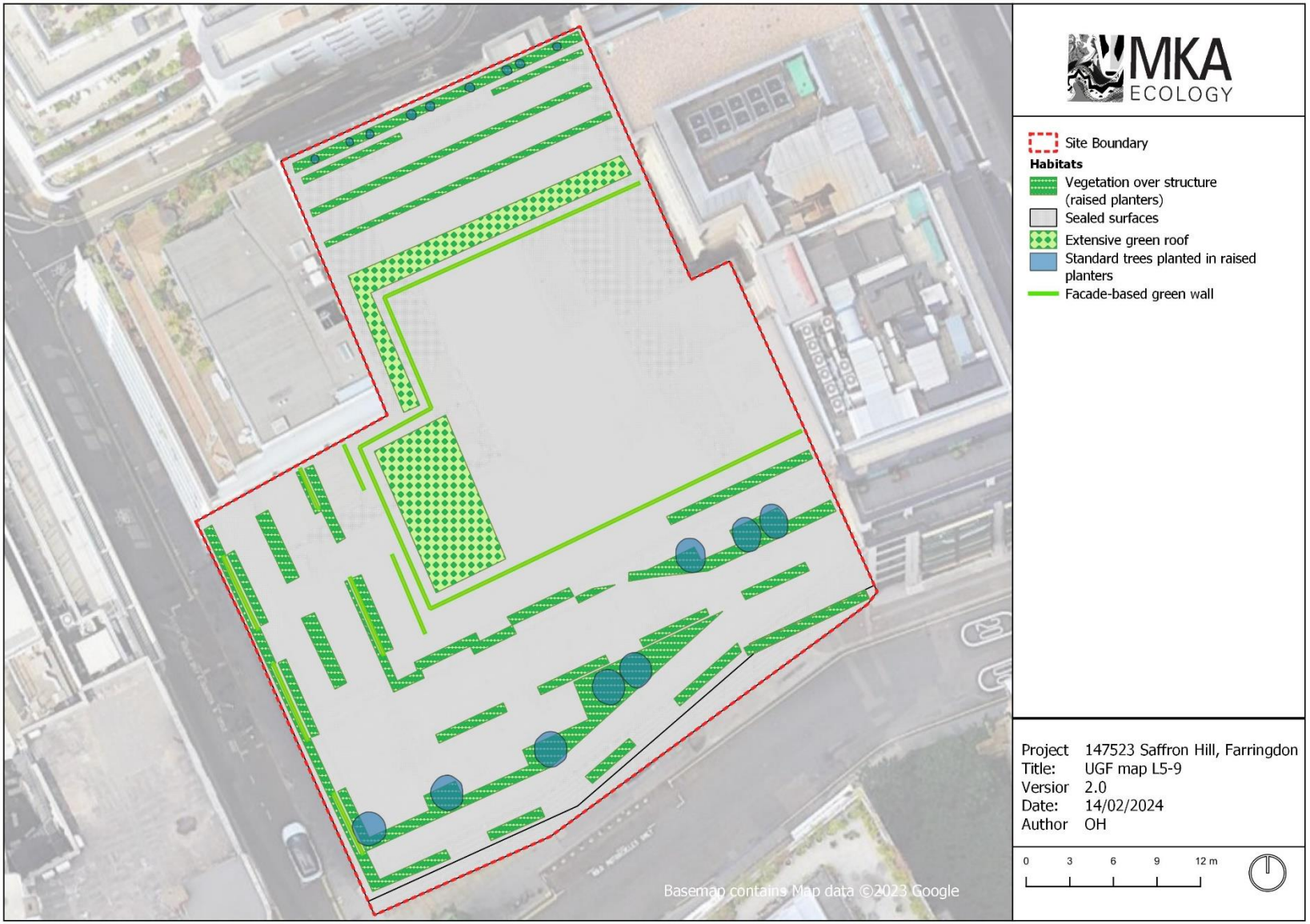
Figure 3: Proposed landscaping plans at Saffron Hill, Farringdon – Levels 1 – 4 (plan courtesy of MRG Studio, 2024)

Figure 4: Proposed landscaping plans at Saffron Hill, Farringdon – Levels 5 – 9 (plan courtesy of MRG Studio, 2024)

Figure 5: Urban Greening Factor Plan – Ground floor (plan courtesy of MRG Studio, 2024)

Figure 6: Urban Greening Factor Plan – Levels 1 – 4 (plan courtesy of MRG Studio, 2024)

Figure 7: Urban Greening Factor Plan – Levels 5 – 9 (plan courtesy of MRG Studio, 2024)



4. METHODOLOGIES

4.1. Biodiversity Net Gain assessor

This BNG assessment was conducted by Olivia Hine Qualifying CIEEM, Graduate Ecologist at MKA Ecology Ltd. Olivia is currently developing her skills as an ecologist. The Biodiversity Net Gain Plan was reviewed by Rory Roche ACIEEM, Senior Ecologist at MKA Ecology Ltd. Rory has six years' experience conducting Biodiversity Net Gain assessments and is considered a competent assessor under the Statutory Biodiversity Metric requirements (Defra, 2023).

4.2. Assignment of habitats

To establish whether the proposed development will contribute positively to biodiversity we use the Defra Statutory Biodiversity Metric (Defra, 2023). This method uses habitat as a proxy for biodiversity and its primary application is to provide planners and developers with a method of establishing how much and what type of habitats should be created or enhanced in order to ensure that the proposed development results in a net gain for biodiversity. Habitats are assigned the following scores:

- Distinctiveness: A measure of the type and importance of a habitat.
- Condition: A measure of the present or predicted condition of a habitat type.
- Strategic significance: How a habitat is regarded within Local Planning Policy.

Habitat distinctiveness is automatically assigned in the Statutory Biodiversity Metric. Please see Appendix 1 for further information on how habitat condition and strategic significance was assigned in this assessment.

For proposed habitats, where there is an attempt to predict the habitat type following establishment additional handicaps or risk scores are imposed representing the following factors:

- Difficulty: More difficult habitats incur a greater risk.
- Time to condition: In general, it takes longer for habitats to reach a better condition, plus certain habitats by their very nature take longer to create or restore.
- If the creation or enhancement of habitats is delayed, an additional risk score is applied. This will not apply in the present case.
- If habitats are created off-site, an additional risk score is applied. This will not apply in the present case.

The multipliers used in habitat assignment in the Biodiversity Net Gain Metric are detailed further in Table 3 below.

Table 3: Multipliers used in the calculation of Biodiversity Net Gain

Multiplier	When applied	Description
Distinctiveness	Before and after	A measure of the type of habitat, automatically assigned within the Metric 3.0. Habitats with greater value are assigned a higher score.
Condition	Before and after	The condition of the habitat. Uses the Technical Supplement (*Panks et al. 2021a*); Higher levels of condition give rise to greater values. In some cases, no condition assessment is required and these habitats are automatically allocated a score.
Strategic significance	Before and after	Whether a habitat is important within its local context.
Time to target condition	After	Used to account for the fact that habitat creation as part of a development is rarely instant. A 'handicap' is applied, with habitats that take longer to establish resulting in a greater reduction.
Difficulty of creation/restoration	After	Habitats that are more difficult to create/restore cause a reduction in the biodiversity unit as they are associated with a greater risk of failure.
Spatial risk	After	Habitat that is created at a greater distance away from the development site carries a greater risk of removing other natural habitats.
Advanced and delayed habitat creation	After	Used to account for situations where there is a mismatch between a negative impact on biodiversity and work to create or enhance the 'post-intervention habitats'. This can either be in the form of habitat creation occurring in advance or being delayed beyond the point of baseline losses.

Further detail on how the metric is calculated is provided in the aforementioned publications, with more details for this specific assessment provided in Appendix 1 and Appendix 2.

4.3. Trading Summary

The Defra Statutory Biodiversity Metric includes a Trading Summary which must be satisfied to achieve a positive outcome in the Net Gain assessment. The trading rules ensures that habitat losses are compensated for on a "like for like" or "like for better" basis. Newly created or enhanced habitats should achieve a higher distinctiveness and/or condition than those lost. More information is provided in Table 2 (see Rule 3).

Further details on how the metric is calculated is provided in the aforementioned publications, with more site-specific detail provided in Appendix 1 and Appendix 2.

4.4. Mapping habitats

Current habitats were mapped and areas calculated using QGIS during the Preliminary Ecological Appraisal (see Section 3.1 for details of habitat types). The proposed habitats areas were provided by MRG Studio (see Section 3.2 for details of habitat types). The landscaping plans are shown on Figure 2, Figure 3 and Figure 4 above.

4.5. Hedgerows

Hedgerows, given their unique linear characteristic and their position as 'edge habitats' are treated as linear features in the Statutory Biodiversity Metric calculator and are calculated as 'biodiversity metres'. The metrics calculated for hedgerows have therefore been calculated and presented separately. No hedgerows are present on site and therefore this category is omitted in this assessment.

4.6. Rivers and streams

Rivers and streams, given their linear form and important role in habitat connectivity, are treated as linear features in the Statutory Biodiversity Metric calculator and are calculated as 'biodiversity metres'. No rivers are present on site and therefore this category is omitted in this assessment.

4.7. Habitat degradation

It is confirmed that the baseline habitats have not been significantly altered or modified since 05 October 2023 and, as such, it is appropriate to assess the baseline habitats in their current condition.

4.8. Sharing data

Relevant ecological data collected during baseline habitat and protected species surveys at the Site will be shared with Greenspace Information for Greater London (GiGL) following acceptance of this Biodiversity Gain Plan.

4.9. Assumptions and constraints

Several assumptions are made to enable this BNG assessment. The primary assumptions are listed below:

- The net gains in biodiversity that are estimated are reliant on the successful restoration and/or creation of habitats and their maintenance for the foreseeable future; this is particularly true of the creation of biodiverse green roofing and planting of urban trees;
- It is assumed that there will be no time delay in establishing the habitats; and
- Proposed tree canopy areas have been calculated using the "Tree helper" within the Metric calculator tool. As per The Defra Statutory Biodiversity Metric: User guide (DEFRA, 2024) size classes for newly planted street trees have been categorised as 'small'.

Table 4: Attribution of multiplier levels to each habitat type at present and for the proposed development

Habitat type and area (onsite)	Multiplier (and score)					
	Distinctiveness (automatically assigned)	Condition	Strategic significance	Time to target condition (years)	Difficulty of creation/ enhancement	Spatial risk
Current habitats						
Developed land; sealed surface 0.1430ha	Very low (0)	N/A	Low (1.00)	-	-	-
Proposed habitats (newly created)						
Developed land; sealed surface (building and hardstanding) 0.0543ha	Very low (0)	N/A	Low (1.00)	0 years (1.000)	Low (1.00)	Within Site
Facade-bound green wall 0.0222ha	Low (2)	Moderate (2)	High (1.15)	3 years (0.899)	Medium (0.67)	Within Site
Biodiverse green roof 0.0094ha	Medium (4)	Good (3)	High (1.15)	10 (0.700)	Medium (0.67)	Within Site
Ground level planters 0.0245ha	Low (2)	Condition assessment N/A (1)	Medium (1.10)	1 (0.965)	Low (1.00)	Within Site
Urban tree 0.0326ha	Medium (4)	Moderate (2)	Medium (1.10)	27 (0.382)	Low (1.00)	Within Site

4.10.Urban Greening Factor

The UGF is calculated using the methodology set out within the London Plan (Greater London Authority, 2021). The methodology enables a value to be placed on the greening value of the proposed development based on the habitat types that will be present. Habitat types and land uses are assigned a predefined factor value based upon their potential to provide ecological and environmental benefits such as biodiversity conservation, well-being and climate change adaptation.

The UGF considers a range of habitats and land uses, such as trees, green roofs, green walls and rain gardens. Table 5 below provides a list of the surface cover types and their associated urban greening factor.

Table 5: Surface cover types and associated urban greening factor

Surface cover type	Urban greening factor
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1.0
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1.0
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.	0.8
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.	0.7
Flower-rich perennial planting.	0.7
Rain gardens and other vegetated sustainable drainage elements.	0.7
Hedges (line of mature shrubs one or two shrubs wide).	0.6
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6
Green wall –modular system or climbers rooted in soil.	0.6
Groundcover planting.	0.5
Amenity grassland (species-poor, regularly mown lawn).	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.	0.3
Water features (chlorinated) or unplanted detention basins.	0.2
Permeable paving.	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0.0

The urban greening factor for a development is calculated in the following way;

(Factor A x Area) + (Factor B x Area) + (Factor C x Area) etc. divided by the total site area.

The proposed habitats were calculated in QGIS using a digitised and geo-referenced version of the architectural plans, as shown in Figure 5, Figure 6 and Figure 7.

5. RESULTS AND RECOMMENDATIONS

5.1. Biodiversity Net Gain

The overall comparison of biodiversity units is presented in Table 6 below. The calculator used to derive these figures is provided as a separate appendix (Appendix 2) to this report.

Table 6: Results of biodiversity metric calculations

Habitat	Biodiversity units (current)*	Biodiversity units (proposed)*	Biodiversity net-change*	Net percentage change
Habitats	0.00	0.28	0.28	N/A

* Habitat areas are calculated as biodiversity hectares, hedgerows and rivers as biodiversity metres

Under the current proposals, there will be an overall net gain in biodiversity of 0.28 habitat biodiversity units. Given the absence of habitats of biodiversity value within the existing Site, a net gain percentage cannot be calculated, however the proposed habitat creation, including the inclusion of raised planters, urban trees, façade-bound green walls and a biodiverse green roof, and subsequent habitat units attributable to the proposed development, is considered adequate to address the requirement for the development to achieve a net gain in biodiversity.

These gains are dependent on the proposed habitats being subject to appropriate management and maintenance in order to achieve the proposed target conditions, a summary of which has been included at Appendix 1, where appropriate. As set out within the Environment Act 2021, a management plan should provide guidance on habitat creation, management and maintenance for 30 years. To ensure the successful creation, management and maintenance of the habitats within the Site post development, it is recommended that a Landscape and Environmental Management Plan (LEMP) is produced prior to the commencement of the relevant works on the Proposed Development.

It is recommended that bird and bat boxes are also installed in the new building as part of the proposed landscaping plans (MKA Ecology Ltd, 2023). The Defra Statutory Biodiversity Metric has no means to formally account for these enhancements in the net gain assessment. However, they will provide additional value for biodiversity post-development and therefore should be noted.

5.2. Urban Greening Factor

The Urban Greening Factor scores for the Site are shown in Table 7 below. The calculator used to derive these figures is provided at Appendix 3.

Table 7: Urban Greening Factor scores for the proposed development

Surface cover type	Urban greening factor	Site area (m^2)	Site urban greening factor
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm – see livingroofs.org for descriptions	0.8	245.00	196.00
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	0.8	42.80	34.24
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014	0.7	93.80	65.66
Green wall – modular system or climbers rooted in soil	0.6	221.80	133.08
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone)	0	826.60	0
Total area		**1430.00**	
Total site greening factor			**428.98**
Urban greening factor of proposed development (total site greening factor/total area)	**0.30**		

The calculated urban greening factor for the proposed development is 0.30.

The largest contributor to the urban greening factor is creation of 245.00m^2 of raised planters located on the upper terrace balconies.

5.3. Recommendations

The overall net gain in biodiversity units predicted in this assessment is reliant on the successful creation of habitats and their maintenance for the foreseeable future. It is important that habitats meet the target condition estimated in this assessment and this will require careful consideration during both the planning and construction phase. It is particularly important that the urban trees and ground-level planting reach and maintain their respective target structures and conditions.

It is recommended that a LEMP is produced for the Site. This will outline measures for the successful creation and management of habitats for a minimum of 30 years to ensure the target conditions for each habitat type is reached as outlined in this assessment.

Recommendation 1

Produce a LEMP for the Site covering a minimum of 30 years post-development.

6. CONCLUSIONS

The proposed development at Saffron Hill involves the demolition of the existing building to create a multistorey office building with café/restaurant space at ground floor level along with associated landscaping works. The landscaping plans include several biodiversity enhancement measures, including the incorporation of a green roof, urban trees, raised planters and the provision of facade-based green walls.

The BNG assessment has calculated that the proposed development is likely to lead to the gain of 0.28 biodiversity units, provided that these habitats are created, managed and maintained appropriately. A net gain percentage cannot be calculated due to the absence of habitats within the pre-development Site, however the proposed habitat creation is considered adequate to address the requirement for the development to achieve a net gain in biodiversity. The proposed development includes a number of new green features incorporated into the new building; green roofs and green walls are identified as priority habitats within the London Plan (Greater London Authority, 2021), and therefore this proposal meets local planning policy and will contribute to local nature recovery strategies. Gains are contingent on habitats being created, managed and maintained appropriately and in line with a detailed LEMP, as required under the Environment Act.

The UGF for the proposed development is 0.30. The London Plan sets out score requirements of 0.30 for predominantly commercial developments; therefore, the current development proposals meet this target.

Other ecological features, such as bird boxes and bat boxes, are proposed to be included within the development (MKA Ecology, 2023). Whilst not considered within the current metrics, these features will further enhance the Site for priority species and help deliver a sustainable development.

7. REFERENCES

Baker, J., Hoskin, R. & Butterworth., T. (2019) *Biodiversity net gain: Good practice principles for development. Part A. A practical guide.* CIRIA, UK

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8. APPENDICES

8.1. Appendix 1: Assignment of biodiversity metric multipliers

Strategic significance

The Site is located in an area of Nature Deficiency in the Borough of Camden (Camden London Borough Council, 2017b). Strategic significance was set to a baseline of low for baseline and newly created 'developed land; sealed surface' habitats (i.e. buildings).

Green walls and green roofs are identified as priority habitats in the London Plan (2021) and will provide valuable resources for birds and invertebrates in an otherwise highly urbanised environment. Therefore, these habitats were assigned high strategic significance.

Ground level planters are not formally identified in local strategies but have potential to provide valuable foraging habitat and shelter for invertebrates within a heavily built-up urban environment, particularly if the planting represents a variety of plant families. Therefore, this has been assigned as medium strategic significance.

Condition

The below tables detail the rationale for the condition assessments made for each habitat type.

Existing habitats

Other habitats

Habitat	Condition	Comments
Urban – Developed land; sealed surface (buildings)	N/A	Pre-assigned condition in metric.

Proposed habitats: newly created

Urban – Facade-based green wall

Condition Assessment Criteria		Rationale for Meeting Condition Assessment Criteria	
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.*	The green wall will include species selected to maximise the opportunities available for invertebrates and birds, and subsequent predatory fauna such as bats. However, as the green wall will comprise a single eco-tone, this criterion cannot be met.	x
2	*There is a diverse range of flowering plant species, providing nectar sources for insects. These species*	A diverse range of flowering plant species are included within the planting palette for the proposed green	✓

	Condition Assessment Criteria	Rationale for Meeting Condition Assessment Criteria	
	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).*	walls; however, these comprise non-native varieties of clematis *Clematis armandii* and jasmine *Jasminum officinale.*	
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).*	No invasive non-native species are to be included within this habitat. Maintenance of this habitat is to be provided within a future management plan, with recommendations relating to the removal of non-native species that develop within these areas. Provided this is followed, it is considered that this criterion can be met.	✓
*	**Target Condition: Moderate** Predicted to meet two criteria, but is unable to achieve "good" condition due to the presence of non-native species.		

Urban – Biodiverse green roof

	Condition Assessment Criteria	Rationale for Meeting Condition Assessment Criteria	
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.*	The green roofing areas will include a diverse assemblage of appropriate species, with species selected to provide a varied vegetation structure to maximise the opportunities available for invertebrates and subsequent predatory faunal groups. Areas of bare ground, log piles and sand or spoil piles will also be included; these will form multiple ecotones.	✓
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).*	The native species included within this habitat been selected due to the nectar and pollen they provide to invertebrate species. Guidance on the species to include within this habitat will be provided within a future management plan.	✓
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).*	All species to be planted are of native origin. Details on the maintenance of this habitat will be within a future management plan, with recommendations relating to the removal of non-native species that develop within these areas. Provided this is followed, it is considered that this criterion can be met.	✓
4	*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.*	The green roof substrate will have a varied depth so as to create small localised changed in micro-climate. Sand piles, log piles and bare ground will also be present as detailed within the future management plan so as to provide habitat for invertebrates.	✓
*	**Target Condition: Good** Meets all condition criteria.		

Urban – Urban trees

	Condition Assessment Criteria	Rationale for Meeting Condition Assessment Criteria	
1	*More than 70% of trees are native species.*	The design proposals indicate that the tree planting will comprise strawberry trees *Arbutus unedo* and therefore, due to the inclusion of non-native trees, this criterion will not be met.	x
2	*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.	✓
3	*More than 50% of trees are mature or veteran.*	Trees to be planted will initially comprise whip planting and so are young in nature. It is anticipated that these trees will be allowed to mature, however, this will be limited by their setting within a raised terrace planter and, in any case, will extend beyond the scope of the future management plan.	x
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.*	Maintenance of this habitat will be provided within future management plan, with recommendations provided to ensure that there are no adverse impacts on tree health through anthropogenic activities. Provided this is followed, it is considered that this criterion can be met.	✓
5	*Management regime has encouraged micro habitat sites for birds, mammals and insects e.g. presence of deadwood, cavities or loose bark etc.*	The species and age of the trees are unlikely to produce ecological niches like deadwood, cavities or loose bark within the 27 year period to meet target condition.	x
6	*More than 20% of the tree canopy area is oversailing vegetation beneath.*	The trees will be oversailing vegetation in raised planters.	✓
*	**Condition: Moderate** Predicted to meet the conditions of criteria 2, 4 and 6.		

Other habitats

Habitat	Condition	Comments
Urban – Ground level planters	N/A	Pre-assigned condition in metric.
Urban – Developed land; sealed surface (buildings)	N/A	Pre-assigned condition in metric.

8.2. Appendix 2: Biodiversity Net Gain calculator

As attachment.

Please note there is a 'check areas' error message in Tab A-2 of the Biodiversity Net Gain calculator. This is believed to be an error in the calculator and there is no discrepancy in the pre-development and post-development areas.

8.3. Appendix 3: Urban Greening Factor calculator

As attachment.

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