NEW CITY COURT

# Biodiversity Net Gain Report

Waterman Infrastructure & Environment

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# New City Court, Southwark, London

## Technical Note – Biodiversity Net Gain Assessment

**Date:** July 2021

**Client Name:** GPE (St Thomas Street) Limited

**Document Reference:** WIE11375-103-TN-5-3-1-BNG

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

| Issue | Prepared by | Checked by | Approved by |
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# 1. Introduction

Waterman Infrastructure & Environment Ltd (hereafter Waterman) has been instructed by GPE (St Thomas Street) Limited (the 'Applicant') to undertake a Biodiversity Net Gain (BNG) Assessment of the proposed development of New City Court, 4 – 26 St Thomas Street, London, SE1 9RS (the 'Site').

## 1.1 Site Setting

The Site is approximately 0.36 hectares (ha) in area and is centred on National Grid Reference (NGR) 532727 180155. The Site currently comprises three office building blocks, with associated plant rooms and car parking. Ornamental planting and ephemeral / short perennial vegetation (**Figure 1**) is present at ground and rooftop levels. The Site is bound by St Thomas Street to the north, King's Head Yard to the south, the A3 to the west and Guy's Hospital buildings to the east.

A Preliminary Ecological Appraisal (PEA) was undertaken by Waterman in August 2016[1] and updated in November 2018[2] to support previous planning applications. The PEAs comprised the following assessments:

- Ecological data search – July 2016;
- 'Extended' Phase 1 Habitat Survey – 19th July 2016;
- External building inspection for bat roost potential – 19th July 2016;
- Invasive plant species assessment – 19th July 2016.
- Ecological data search – May 2018;
- 'Extended' Phase 1 Habitat Survey – 3rd May 2018;
- External building inspection for bat roosting potential – 3rd May 2018; and
- Invasive plant species assessment – 3rd May 2018.

A further update PEA was undertaken by Waterman in March 2021 and comprised the following assessments:

- Ecological data search – February 2021;
- A UK Habitat Classification (UKHab)[3] field survey – 8th December 2020;
- Preliminary Roost Assessment for bats – 8th December 2020; and
- Invasive Plant Species Assessment – 8th December 2020.

The above assessments found the Site to comprise habitats associated with the urban environment and when assessed against UK HABS[4] were categorised as:

- Urban – Buildings (u1b5);
- Urban – Other development land (u1b6); and
- Heathland and shrub - mixed scrub (h3h) (SC1160).

The extent of the Site together with the location of these habitats are provided on **Figure 1**.

[1] Waterman (2016) *Preliminary Ecological Appraisal New City Court, Southwark, London (Report Ref: WIE11375-100_R_3_2_1_PEA)*
[2] Waterman (2018) *Preliminary Ecological Appraisal New City Court, Southwark, London* (Report Ref: WIE11375-100-R-5-3-3-PEA)
[3] UK Habitat Classification Working Group (2018). UK Habitat Classification User Manual. Ecountability Ltd, Kentisbeare
[4] UK Habitat Classification Working Group (2018). *UK Habitat Classification –Habitat Definitions V1.0 at http://ecountability.co.uk/ukhabworkinggroup-ukhab*

### 1.1.1 Proposed Development

In summary, the Development would comprise office and retail space within a new tower building of 26 storeys (108.0 AOD) in height, remodelled existing buildings and a double basement across part of the Site, together with publicly accessible rooftop garden, a new access to London Bridge Underground Station, new pedestrian routes and public realm at ground level. The proposed site layout is shown in **Appendix A** and further details are provided in Landscape Strategy Addendum submitted with the planning application.

### 1.1.2 Planning Policy

The following planning policies are considered relevant to this assessment:

- National Planning Policy
  - National Planning Policy Framework, 2019[5]
- Regional Planning Policy
  - The London Plan, 2021[6]
- Local Planning Policy
  - The Southwark Plan, 2007[7]
  - Southwark Core Strategy, 2011[8]
  - The Draft New Southwark Plan, 2020[9]

Refer to **Appendix B** for full details of the above planning policies.

[5] Department of Communities and Local Government. (2012). *National Planning Policy Framework*.
[6] Greater London Authority (March 2021) *The London Plan The Spatial Development Strategy for Greater London*
[7] Southwark Council (July,2010); 'Planning policy, The Southwark Plan (adopted 2007) Saved Policies
[8] Southwark Council (April, 2011); 'Planning policy, Core Strategy Plan'
[9] Southwark Council. (2020) 'The Draft New Southwark Plan' Submission Version – Proposed changes..

# 2. Methodology

## 2.1 Baseline survey

As part of the 2021 PEA a UKHab field survey[10] of the Site was undertaken on the 8 December 2020. UKHab supersedes previous systems such as Phase 1 Habitat Survey[11], allowing for direct interpretation of baseline habitat survey data into Priority Habitat Types (HoPI) and Annex I Habitat[12] types.

All habitat types were mapped (**Figure 1**). A fine scale Minimum Mapping Unit (MMU) was deemed an appropriate level for mapping habitats i.e. a habitat area was only mapped if the habitat was greater than 25m$^2$ or 5m in length.

Each habitat was assigned a Primary Code of the Professional Edition of the UKHab Field Key[13] at a minimum of the Level 3 hierarchy, using the UKHab Habitat Definitions[14] for reference. Secondary Codes (SC) were then applied to provide additional context to the habitats, with no more than six Secondary Codes being assigned.

An assessment of the Site and adjacent areas to support protected and notable fauna and flora species was also undertaken.

**Figure 1** details the habitats found on site in the UKHab[15] format, as required for this assessment.

## 2.2 Condition assessment

### 2.2.1 Habitats

A condition assessment has been undertaken on the habitats present at the Site using the Biodiversity Metric 2.0 – Technical Supplement[16]. This document sets out criteria and characteristics for each habitat and provides guidance on an assessment of habitat condition (which can be 'good', 'fairly good', 'moderate', 'fairly poor' and 'poor'). The assessment criteria considered is varied for each habitat but includes criteria such as the presence of undesirable species, habitat extent, habitat health and vegetation structure.

### 2.2.2 Proposed Habitat Conditions

Proposed habitat conditions have been assigned to newly created and enhanced habitats. This has been achieved by reviewing the criteria characteristics for each habitat, set out in the Biodiversity Metric 2.0 – Technical Supplement and the proposed soft landscaping plans to determine a realistic, likely achievable condition once the habitats have established and been subject to appropriate management.

[10] UK Habitat Classification Working Group (2018). UK Habitat Classification User Manual. Ecountability Ltd, Kentisbeare
[11] JNCC. (2010). *Handbook for Phase 1 Habitat Survey*. Nature Conservancy Council.
[12] Habitats listed in Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora.
[13] Carey. P, Butcher.B (2018) *UK Habitat Classification Field Key.*
[14] UK Habitat Classification Working Group (2018*). UK Habitat Classification Definitions V1.0 at https://ukhab.org/ukhab-documentation/*
[15] UK Habitat Classification Working Group (2018*). UK Habitat Classification User Manual* at https://ukhab.org/ukhab-documentation/.
[16] Ian Crosher, Susannah Gold, Max Heaver, Matt Heydon, Lauren Moore, Stephen Panks, Sarah Scott, Dave Stone & Nick White (2019) *The Biodiversity Metric 2.0: Auditing and accounting for biodiversity value: technical supplement (Beta version, July 2019).* Natural England

## 2.3 BNG calculations

The baseline biodiversity unit value of the site has been determined using the Biodiversity Metric 2.0 Calculation Tool (Beta Test December 2019 Update – 2019/12/19). This calculation tool was developed to provide a standardised methodology for undertaking BNG assessments.

Baseline biodiversity units have been established using the findings of:

- The 2020 UKHab field survey;
- The accurate measurement of on-Site habitats in accordance with current topographical survey information; and
- Professional judgement.

### 2.3.1 Limitations and Assumptions

For the purpose of this BNG assessment, the interim connectivity guidance as set out within the Biodiversity Metric 2.0 – Technical Supplement has been used to determine ecological connectivity.

For this assessment, and as per best practice, habitat areas have been rounded up or down where applicable to two decimal places. Whilst small areas of ephemeral / ruderal vegetation were recorded as being present on Site, given that these areas comprise a total extent of approximately 7m$^2$ (refer to PEA report), they have been excluded from the BNG calculations for the purpose of this assessment. Nevertheless, given the extent of the post-development landscaping to be implemented, this is not considered to significantly affect the BNG calculations undertaken as part of this assessment.

The habitat Urban: Introduced Shrub has been used in the BNG calculator for the habitats classified by UKHabs as Mixed Scrub. Introduced Scrub is not one of the classified habitats under UKHabs, but it's description fits the habitat on Site more closely than the description of Mixed Scrub.

We have made the assumption that developed land on Site has a low strategic significance, even though 'Built Environment' is a listed as a Habitat Action Plan (HAP) under the Southwark Nature Action Plan (SNAP). This is due to the building on Site being assessed as offering limited ecological value during the Preliminary Ecological Appraisal.

There are no linear habitat or river features within the pre-development plans or the proposed landscaping plans, therefore no linear or river assessments have been undertaken.

It has been assumed the new landscaping under the Applicant's ownership will be subject to a management regime of a minimum of 30 years as per best practice guidance[17]. A Landscape and Ecological Management Plan will be produced at a later stage by the Suitability Qualified Ecologist appointed to undertake the ecological BREEAM Assessment.

[17] CIEEM, CIRIA, IEMA (2016) Biodiversity Net Gain: Good practice principles for development, 2016

# 3. Habitat Assessment

## 3.1.1 Baseline Biodiversity Value

**Table 1** below details the pre-development habitats and their corresponding biodiversity value.

Table 1: Pre-development habitats

| Habitat | Area (ha) | Habitat Distinctiveness | Habitat Condition | Biodiversity Value |
|---|---|---|---|---|
| Urban – Developed land; sealed surface | 0.31 | Very low | N/A* | **0** |
| Urban – Introduced Shrub | 0.05 | Low | Poor | **0.10** |
| **Total** | 0.36 | - | - | **0.10** |

*condition N/A due to habitat type

## 3.1.2 Post-development Biodiversity Value

A strategy of extensive creation of new habitats has been incorporated into the Development to achieve a net gain for biodiversity. This will be achieved through the implementation of the following:

- Living roofs (extensive);
- Living roofs (intensive);
- Climbing plants;
- Street trees;
- Urban woodland; and
- Planters with introduced shrubs and trees.

### Habitat Losses, Creation and Enhancement

#### *Habitat losses*

**Table 2** below details the habitats lost post-development and the corresponding biodiversity value losses.

Table 2: Post-development habitat losses

| Habitat | Area (ha) lost | Habitat Distinctiveness | Habitat Condition | Biodiversity Value Lost |
|---|---|---|---|---|
| Urban – Developed land; sealed surface | 0.31 | Very low | N/A* | **0** |
| Urban – Introduced Shrub | 0.05 | Medium | Poor | **0.10** |
| **Total** | 0.36 | - | - | **0.10** |

*condition N/A due to habitat type

#### *Habitat creation*

**Table 3** below details the habitats to be created post-development and the corresponding biodiversity values.

Table 3: Post-development habitat creation

| Habitat | Area (ha) | Habitat Distinctiveness | Habitat Condition | Biodiversity Value |
|---|---|---|---|---|
| Urban - Extensive green roof | 0.02 | Medium | Moderate | **0.10** |
| Urban – Intensive green roof | 0.03 | Low | Moderate | **0.10** |
| Urban – Ground level planters | 0.01 | Low | Poor | **0.02** |
| Urban – Street trees | 0.01 | Low | Moderate | **0.02** |
| Urban - Ground based green wall | 0.04 | Low | Moderate | **0.10** |
| Urban – Façade-bound green wall | 0.06 | Low | Moderate | **0.14** |
| Urban - Woodland | 0.02 | Medium | Moderate | **0.06** |
| Urban - Developed land; sealed surface | 0.20 | Very Low | N/A* | **0.00** |
| **Total** | 0.36 | - | - | **0.53** |

*condition N/A due to habitat type

### 3.1.3 Biodiversity Net Gain Assessment

In line with the Defra Biodiversity Metric 2.0 Calculation Tool, the BNG Assessment confirms a BNG of **433.32%** for habitats as a result of the proposed Development. Refer to **Appendix C** for the headline results. The full completed Defra biodiversity Metric 2.0 Calculation Tool[18] can be provided upon request.

## 4. Long-term Management of Habitats

To secure the management of the newly created and retained habitats over a 30-year period, an Ecological Management Plan will be produced at a later stage. Following a review of the Ecological Management Plan and the criteria characteristics for each proposed habitat, set out in the Biodiversity Metric 2.0 – Technical Supplement, the likely achievable condition of the habitats used within the calculation tool may be changed.

## 5. Conclusion

Current Site proposals will provide a BNG of **433.32%** for habitats at the Site. No linear or river assessment has been made as no linear or river habitats are present on Site or are proposed.

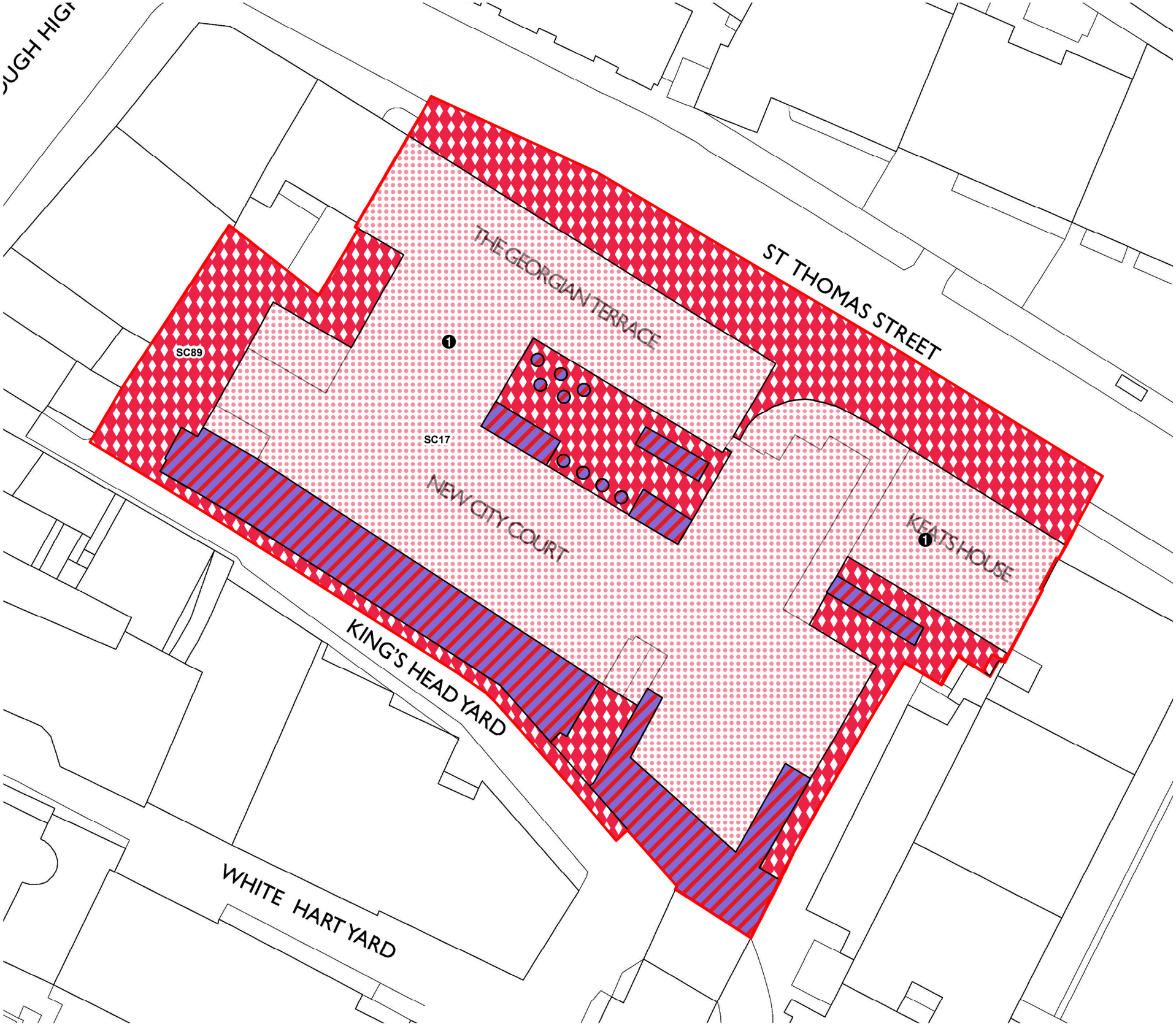
It is therefore confirmed that the proposed habitat creation for the Site is compliant with local and regional planning policy as specifically detailed in **Appendix B.**

In the event that landscape proposals are updated at a later stage, this BNG assessment should be updated as necessary to reflect the BNG provision at the Site as a result of any updated landscape plans.

[18] Defra Biodiversity Metric 2.0 (2019) Accessed at The Biodiversity Metric 2.0 - JP029 (naturalengland.org.uk)

# FIGURES

Figure 1: Habitat Features Plan (ref. WIE11375-103_GR_PEA_2B)

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Site Boundary

Mixed Scrub Non Native (h3h)
(Secondary Codes 47, 48, 1160)

Buildings (u1b5)

Other Developed Land (u1b6)

1 Buddleia - LISI Species Present

Secondary Code

SC17 - Ruderal / Ephemeral
SC89 - Car Park

N

0 1.5 3 6 9 12
Meters

| | |
|---|---|
| Project Details | WIE11375-103: New City Court |
| Figure Title | Figure 2: Habitat Features Plan |
| Figure Ref | WIE11375-103_GR_PEA_2B |
| Date | April 2021 |
| File Location | \\s-lncs\wiel\projects\wie11375\103\gr\pea\issued figures |

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# APPENDICES

## A. Soft Landscaping Plans.


General Notes:

All architectural, structural, mechanical, electrical and utilities items are shown for legibility purposes only, the relevant Architect or Engineer's drawings and specification must be referred to for such items.

Do not scale off this drawing. Use figured dimensions only. All dimensions and levels shown on drawings are subject to verification on site. MRG Studio does not accept responsibility for accuracy of survey information.



## Legend

Red line boundary

### Paving

- Natural stone paving
- Cobblestone — Match existing cobblestone
- Granite setts paving
- Existing paving — London Underground station
- Yorkstone paving — Match existing pavement
- Stairs

### Furniture

- Raised planter
- Seat
- Retaining wall
- Cycle stands — 37no. stands

### Planting

- Planting
- Street tree
- Climbers
- Tree

| revision | date | by | appr | description |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| 01 | 16/04/2021 | JFP | JM | PLANNING SUBMISSION |

landscape architect
MRG Studio

client
GPE (St Thomas Street) Limited

project
New City Court

drawing title
General Arrangement
Ground Floor

drawing number
166-NCC2-GA01

| scale | date | revision |
|---|---|---|
| 1:200@ A1<br>1:400 @ A3 | 26 March 2021 | 01 |


General Notes:

All architectural, structural, mechanical, electrical and utilities items are shown for legibility purposes only, the relevant Architect or Engineer's drawings and specification must be referred to for such items.

Do not scale off this drawing. Use figured dimensions only. All dimensions and levels shown on drawings are subject to verification on site. MRG Studio does not accept responsibility for accuracy of survey information.



## Legend

Red line boundary

### Paving

Natural stone paving

Gravel strip
Maintenance path

### Furniture

Raised planter

Abseiling anchor point
Recessed in paving

Seat

### Planting

Planting

Biodiverse roof planting

Trees

| revision | date | by | appr | description |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| 01 | 16/04/2021 | JFP | JM | PLANNING SUBMISSION |

landscape architect
MRG Studio

client
GPE (St Thomas Street) Limited

project
New City Court

drawing title
General Arrangement
Level 03 Terrace, Balconies &
Level 01 Green Roof

drawing number
166-NCC2-GA02

| scale | date | revision |
|---|---|---|
| 1:200@ A1<br>1:400 @ A3 | 26 March 2021 | 01 |


General Notes:

All architectural, structural, mechanical, electrical and utilities items are shown for legibility purposes only, the relevant Architect or Engineer's drawings and specification must be referred to for such items.

Do not scale off this drawing. Use figured dimensions only. All dimensions and levels shown on drawings are subject to verification on site. MRG Studio does not accept responsibility for accuracy of survey information.



## Legend

Red line boundary

### Paving

Natural stone paving 1

Natural stone paving 2

Wooden board path
Spaced apart to allow treadable planting in between

### Furniture

Raised planter

Rocks

Seat

### Planting

Planting

Climbers

Wildlife terrace planting

Tree

| revision | date | by | appr | description |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| 01 | 16/04/2021 | JFP | JM | PLANNING SUBMISSION |

landscape architect
MRG Studio

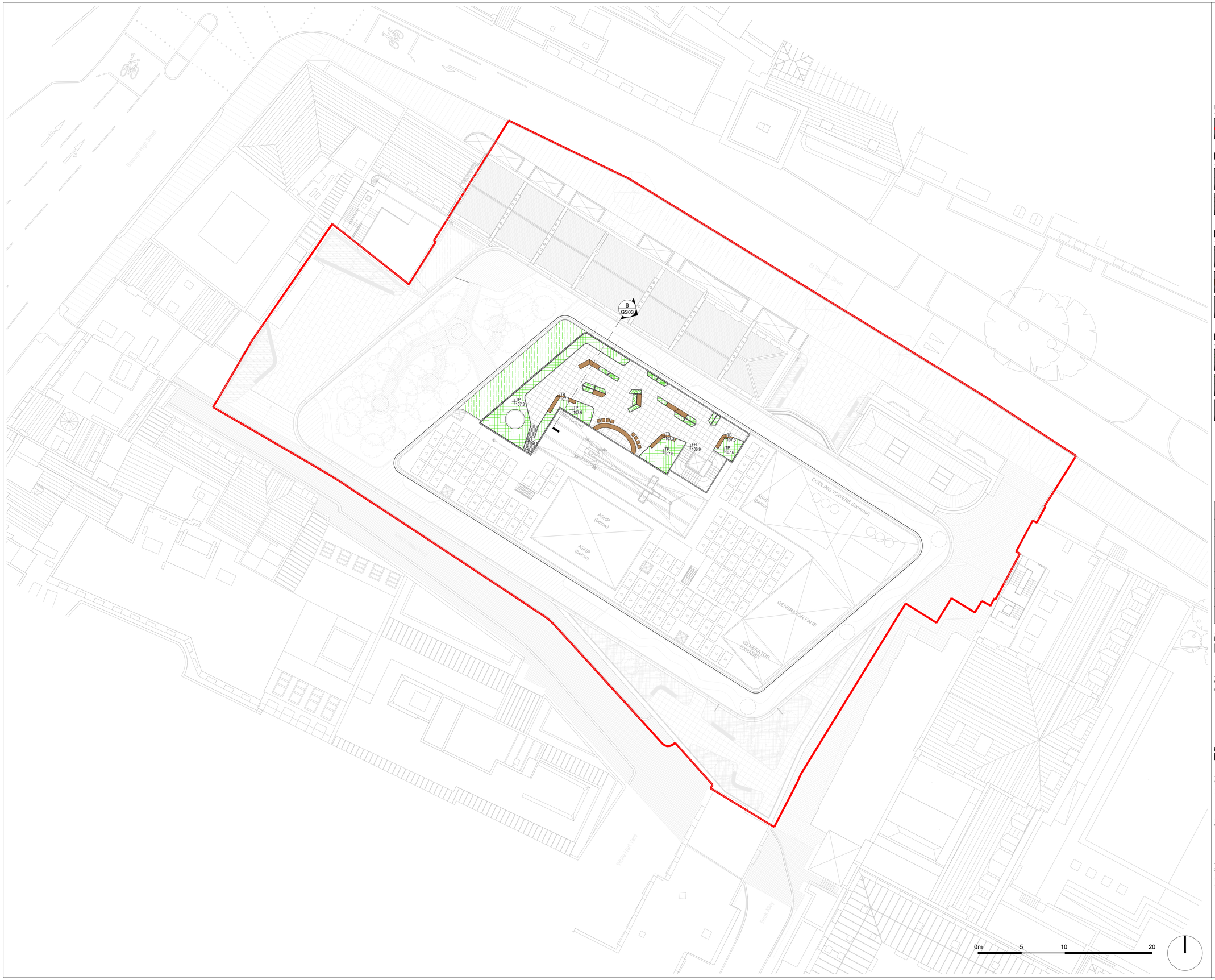
client
GPE (St Thomas Street) Limited

project
New City Court

drawing title
General Arrangement
Level 24 Terrace

drawing number
166-NCC2-GA03

| scale | date | revision |
|---|---|---|
| 1:200@ A1<br>1:400 @ A3 | 26 March 2021 | 01 |




General Notes:

All architectural, structural, mechanical, electrical and utilities items are shown for legibility purposes only, the relevant Architect or Engineer's drawings and specification must be referred to for such items.

Do not scale off this drawing. Use figured dimensions only. All dimensions and levels shown on drawings are subject to verification on site. MRG Studio does not accept responsibility for accuracy of survey information.



## Legend

Red line boundary

### Paving

Natural stone paving

Wooden board path

### Furniture

Raised planter

Seat

Moveable modular seat

### Planting

Planting

Biodiverse roof planting

Moveable modular planter

| revision | date | by | appr | description |
|---|---|---|---|---|
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| 01 | 16/04/2021 | JFP | JM | PLANNING SUBMISSION |

landscape architect
MRG Studio

client
GPE (St Thomas Street) Limited

project
New City Court

drawing title
General Arrangement
Level 26 Terrace

drawing number
166-NCC2-GA04

| scale | date | revision |
|---|---|---|
| 1:200@ A1<br>1:400 @ A3 | 26 March 2021 | 01 |

# B. Planning Policy

## National Planning Policy

### National Planning Policy Framework, 2019

The National Planning Policy Framework[19] (NPPF) was revised in February 2019. Section 11 (outlined below) of the NPPF, 'Conserving and Enhancing the Natural Environment', effectively replaces former Planning Policy Statement 9: Biodiversity and Geological Conservation. However, Government Circular 06/2005[20] - Biodiversity and Geological Conservation: Statutory Obligations and Their Impact within the Planning System, remains valid and is referenced within the NPPF.

The NPPF encourages the planning system to contribute to and enhance the natural and local environment. This should be achieved by:

- *Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the government's commitment to halt the overall decline in biodiversity, including by establishing ecological networks that are more resilient to current and future pressures;*

## Regional Planning Policy

## The London Plan 2021: The Spatial Development Strategy for Greater London

The New London Plan 2021[21] sets out the overall strategic plan, setting out a framework for development over the next 20 to 25 years and includes several policies relating to ecology. Key to the London Plan is Policy G6 'Biodiversity and Access to Nature' which sets out the Mayor's policy in relation to biodiversity and access to nature.

This policy states that….'*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'.*

## Mayor of London: Environment Strategy, 2018

Mayor of London: London Environment Strategy, 2018 compliments the London Plan. It sets out how London's biodiversity can be protected and enhanced and contains a list of Priority Habitats and Species within the city. The relevant policy within the strategy is Policy 5.2.1 'Protect a core network of nature conservation sites and ensure a net gain in biodiversity'.

## Local Planning Policy

### Southwark Council Planning Policy: The Southwark Plan, 2007 (Saved Policies)

The Southwark Plan[22] was adopted on 28 July 2007. The Southwark Plan is part of the Development Plan along with the Core Strategy and London Plan. These are the main documents used to make planning decisions and set the strategy for development in Southwark. Some of the detailed Southwark plan policies were 'saved' in July 2010 with permission from the Secretary of State. Some of these policies have now been superseded by policies in the Core Strategy.

[19] Department of Communities and Local Government. (2012). *National Planning Policy Framework*.

[20] Department of Communities and Local Government. (2005). *Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System*.

[21] Greater London Authority (March 2021) *The London Plan The Spatial Development Strategy for Greater London*

[22] Southwark Council (July,2010); 'Planning policy, The Southwark Plan (adopted 2007) Saved Policies

Saved Policy 3.28 – 'Biodiversity' of the Southwark Plan is of relevance to the Site and states:

*"The LPA will take biodiversity into account in its determination of all planning applications and will encourage the inclusion in developments of features which enhance biodiversity, requiring an ecological assessment where relevant. Developments will not be permitted which would damage the nature conservation value of Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves (LNRs) and/or damage habitats, populations of protected species or priority habitats/species identified in the United Kingdom, London or the Southwark Biodiversity Action Plan. Where, exceptionally, such developments are permitted, the Council will seek mitigation and/or compensation for the damage to biodiversity. Where new Sites of Importance for Nature Conservation and Local Nature Reserves are identified, these sites will be afforded protection under this Policy and Policy 3.27, Other Open Spaces".*

### Southwark Council Planning Policy: Southwark Core Strategy, 2011

The Southwark Core Strategy was approved at Council Assembly on the 6 April 2011.

Policy 11 – 'Open Spaces and Wildlife' of Southwark Core Strategy[23] is of relevance to the Site and states:

*"We will improve, protect and maintain a network of open spaces and green corridors that will make places attractive and provide sport, leisure and food growing opportunities for a growing population. We will protect and improve habitats for a variety of wildlife".*

Relevant objectives within the Core Strategy Policy 11 include:

*"Continuing to protect important open spaces from inappropriate development. These will include parks, allotments, sports grounds, green chains, sites of importance for nature conservation (SINCs) and cemeteries. Large spaces of importance to all of London will be protected (Metropolitan Open Land) as well as smaller spaces of more borough-wide and local importance (Borough Open Land and Other Open Spaces);*

*Requiring new development to avoid harming protected and priority plants and animals and help improve and create habitat;*

*Promoting and improving access to and links between open spaces, including green chains;*

*Protecting woodland and trees and improving the overall greenness of places, including through promoting green corridors, gardens and local food growing; and*

*Requiring new development to help meet the needs of a growing population by providing space for children's play, gardens and other green areas and helping to improve the quality of and access to open spaces and trees, particularly in areas deficient in open space".*

### New Southwark Plan

The Council is currently reviewing the Southwark Plan and Core Strategy to prepare a local plan called the New Southwark Plan[24]. This new plan will set out the regeneration strategy from 2017 to 2033 and will be used to make decisions on planning applications submitted after its adoption. The formal consultation of the Proposed Submission Draft Version of the New Southwark Plan concluded on the 27th February 2018. The council is in the process of reviewing all the representations and submission will take place in early 2019. Relevant draft policies include:

- P59: Biodiversity:

[23] Southwark Council (April, 2011); 'Planning policy, Core Strategy Plan'
[24] Southwark Council. 'The New Southwark Plan'. Available on-line at http://www.southwark.gov.uk/info/856/planning_policy/3315/the_new_southwark_plan

*"Planning permission will be granted for development that*

- *Avoids material harm to biodiversity;*
- *Includes features that enhance biodiversity in development, such as green and brown roofs, green walls, soft landscaping, nest boxes and habitat restoration and expansion, improved green links and buffering;*
- *Supports the nature conservation value of Sites of Importance for Nature Conservation (SINCs) and local nature reserves (LNRs) and/or habitats, populations of protected species or priority habitats/species identified in the United Kingdom, London or adopted Southwark Biodiversity Action Plan.*
- *Where material harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or as a last resort, compensated for, then planning permission will be refused."*

As above, this Technical Note details a BNG Assessment for the Proposed Development to achieve a net gain in biodiversity to conform to adopted and emerging national, regional and local planning policy.

## C. Completed Defra Biodiversity Metric 2.0 Calculation Tool Headline Results

| | | |
|---|---|---|
| On-site baseline | *Habitat units* | 0.10 |
| | *Hedgerow units* | 0.00 |
| | *River units* | 0.00 |
| On-site post-intervention (Including habitat retention, creation, enhancement & succession) | *Habitat units* | 0.53 |
| | *Hedgerow units* | 0.00 |
| | *River units* | 0.00 |
| Off-site baseline | *Habitat units* | 0.00 |
| | *Hedgerow units* | 0.00 |
| | *River units* | 0.00 |
| Off-site post-intervention (Including habitat retention, creation, enhancement & succession) | *Habitat units* | 0.00 |
| | *Hedgerow units* | 0.00 |
| | *River units* | 0.00 |
| Total net unit change (including all on-site & off-site habitat retention/creation) | *Habitat units* | 0.43 |
| | *Hedgerow units* | 0.00 |
| | *River units* | 0.00 |
| Total net % change (including all on-site & off-site habitat creation + retained habitats) | *Habitat units* | 433.32% |
| | *Hedgerow units* | 0.00% |
| | *River units* | 0.00% |