



Creating sustainable futures

**Bishopsgate Goods Yard Plot 1**  
**Biodiversity Gain Plan**  
 Report for Bishopsgate Goods Yard  
 Regeneration Limited

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## NOTE

Since this report was prepared, Defra has published updated to Biodiversity Net Gain guidance including the Statutory Biodiversity Net Gain Metric and Biodiversity Net Gain Plan template.

However, as the Proposed Development as a whole has already received planning consent, the Proposed Development is not subject to statutory requirements for biodiversity net gain.

It is considered that this report, and the underlying assessment based on Metric 4.0, is sufficient to meet the GLA's request for a Biodiversity Net Gain assessment and to demonstrate compliance with the requirement in the NPPF (2023) for Biodiversity Net Gain. It is unlikely that use of the statutory metric would lead to substantially different conclusions.

Subsequent Biodiversity Net Gain Plans for future reserved matters applications will be undertaken using the statutory metric and guidance.

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# Summary of Key Findings

Temple was commissioned by Bishopsgate Goods Yard Regeneration Limited in September 2023 to produce a Biodiversity Gain Plan (BGP) of Plot 1 of the proposed development at Bishopsgate former Goods Yard, henceforth referred to as 'the Site', located partially in the London Borough of Hackney and partially in the London Borough of Tower Hamlets. Proposals for the Site included the clearance of the site and the construction of a building comprising of office space and ground floor retail floorspace. The height of the building is proposed to be 12-16 storeys currently envisaged to be a maximum 89.2m AOD. The total Site area is estimated to be 0.41 hectares (ha) for the purpose of this calculation.

The purpose of the BGP is to inform the relevant planning authority of the biodiversity gain outcome from the proposed development, to provide an assessment of the on-site habitat baseline and post-intervention habitats (including clear plans) and to provide a summary of the Natural England Biodiversity Metric 4.0 (referred to as 'the Metric' from this point onwards) calculation. The BGP is intended to be accompanied by a completed and compliant Metric calculation.

The main findings are as follows:

- The baseline value of on-site habitats is calculated to be 0.19 habitat Biodiversity Units (BU), deriving this value from Heathland and Scrub (bramble scrub) habitat groups.
- There are no on-site hedgerows, lines of trees or watercourses.
- The proposed development is estimated to deliver on-site changes resulting in an increase of approximately 0.50 habitat BU derived from the:
  - creation or planting of new on-site habitats including green roofs and individual urban trees.

The predicted total net % change in habitat at +261.82% is considered to meet the current requirement for biodiversity enhancement under the National Planning Policy Framework

(NPPF) and the future ambition set out within the Environment Act. There is a loss of scrub habitats associated with unavoidable elements of the proposed development. There remain opportunities to improve against this level of performance, through off-site measures, if required.

In delivering this level of change the proposed development this plan relies on actions or measures on which this plan relies are on-site and:

- do not adhere to the Metric trading rules (Rule 3) as there is a deficit in like for like medium distinctiveness broad habitat units (including higher distinctness surplus). The loss of heathland and shrub (bramble scrub) results in a loss of 0.19 habitat BU. The loss of these habitats is associated with unavoidable elements of the proposed development in order to provide areas of building and trees. In addition the scrub is in poor condition with invasive species such as Japanese knotweed present;
- will not lead to impacts on protected sites or irreplaceable habitats;
- will not support enhancement of existing on-site habitats;
- will offer the opportunity to create habitats on-site including green roofs, individual trees and flower rich ruderal; and
- has taken opportunities to increase habitat extent and size to maintain ecological connectivity and functionality, including through green roofs and individual trees.

As the proposed development does not satisfy the trading rules off-site BU will need to be sought and agreement reached to secure their delivery in order for net gain to be secured. The level of such off-site contributions for Plot 1 is:

- Heathland and shrub – scrub (blackthorn/bramble/gorse/hawthorn/willow/hazel/ mixed). An estimated 0.05ha or 0.19BU (dependent upon condition and location).

The net gains predicted in this plan will rely on the development of a Habitat Management and Monitoring Plan (HMMP) that sets out landscape planting/site management actions intended to secure the predicted level of biodiversity delivery.

# 1. Introduction

## BACKGROUND TO COMMISSION

- 1.1 Temple was commissioned by Bishopsgate Goods Yard Regeneration Limited in September 2023 to produce a Biodiversity Gain Plan (BGP) of the proposed Plot 1 of the former Bishopsgate Goods Yard. This BGP has been produced in line with current Government advice (Defra, 2023), which sets out changed expectations on how development applications should address mandatory biodiversity net gain (BNG), including an expectation that applicants should produce BGPs in place of the Biodiversity Gain Report (CIEEM, 2021).
- 1.2 This report considers land within the reserved matters planning application site boundary (henceforth referred to as 'the Site') as indicated on Figure 1, Appendix 1. The total Site area is estimated to be 0.41ha for the purpose of this calculation.

## SCOPE OF REPORT- STATUS OF BGP

- 1.3 While, at the time of writing this report, the provisions of the Environment Act 2021 have yet to be fully enacted through secondary legislation, the Act provides a useful definition and expectation of the future requirement for biodiversity gain in planning. The Act describes Biodiversity [Net] Gain objective as having been met *'...if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least...10%.*
- 1.4 As part of its efforts to enact the Environment Act (2021) Government has, within Defra (2022) published guidance and a working draft BGP template, setting out its expectation (Defra, 2023) that planning applications will in future need to be supported by:
- a Biodiversity Gain Plan (BGP); and
  - a compliant Biodiversity Metric calculation.

1.5 The BGP provides the relevant planning authority with sufficient information on the biodiversity performance of the proposed development to inform consideration of the planning application and specifically alignment of the application with the relevant planning policy. In line with Defra (2022) it provides:

- information about how the proposed development has taken steps to avoid and minimise impacts on biodiversity;
- the pre-development and post-development biodiversity value of the on-site habitats;
- any off-site biodiversity gains which are registered and allocated to the proposed development; and
- any UK Government-provided statutory biodiversity credits purchased for the proposed development.

1.6 The BGP compares the Site baseline in terms of the extent, distinctiveness, condition and strategic significance of habitats with the proposed post-development habitats (also referred to as post-intervention scenario) and will be reliant on the development of landscape planting plans and site management plans to secure the predicted level of biodiversity delivery.

1.7 This BGP is supported by a number of other documents or figures, including:

- Figure 1 that provides comprehensive mapping of baseline habitats drawn from the 2022 surveys;
- Figure 2 (SpaceHub, 2023) that presents the indicative post-development planting plan of the proposed development; and
- summary outputs from the Natural England Biodiversity Metric 4.0 (henceforth referred to as 'the Metric', which is submitted along with this plan.

1.8 The BGP has also been prepared with reference to best practice guidance published by the Chartered Institute for Ecology and Environmental Management

(CIEEM, 2021); British Standard 8683:2021 'Process for designing and implementing Biodiversity Net Gain. Specification'; and CIEEM, CIRIA, IEMA (2016) 'Biodiversity Net Gain: Good practice principles for development'.

1.9 The 2022 habitat survey and report was produced by Schofield Lothian (Schofield Lothian 2022) and the 2023 Metric condition assessment on which the BGP is based were conducted by Sasha Dodsworth BSc MSc MCIEEM who is trained and competent in carrying out UKHab habitat surveys and the Metric condition assessments. The BGP was written by Sasha Dodsworth BSc MSc MCIEEM, an experienced ecologist with 16 years' experience. The BGP was reviewed by Stuart Wilson BSc (Hons) MSc MCIEEM CEnv an experienced Divisional Director of Ecology with over 25 years' experience who is trained and competent in all technical aspects pertaining to this report.

## SITE CONTEXT

1.10 The Site is approximately 0.41ha in size and is centred on Ordnance Survey National Grid reference TQ 33510 82228.

1.11 The Site is located on the top of the Bishopsgate Rail Tunnels and bound by Box Park Shopping Centre and sports clubs to the north, artificial sports pitches and scrub associated with the wider former Bishopsgate Goods Yard to the south and east and the A10/Shoreditch High Street and Commercial Street to the west. The surrounding area is largely comprised of urban buildings for commercial uses with limited areas of open green space.

1.12 The Site does not form part of any statutory or non-statutory designated nature conservation site. The closest statutory site is Walthamstow Marshes Site of Special Scientific Interest (SSSI) located 7.6km north. There are six non-statutory sites within 1km of the Site. The closest is Spitalfields City Farm and Allen Gardens Site of Interest of Conservation Interest (SINC), located 300m to the east.

## DEVELOPMENT PROPOSALS

1.13 Proposals for the Site included the clearance of existing vegetation and the construction of a building comprising of office space and ground floor retail floorspace. The height of the building is proposed to be 12-16 storeys currently envisaged to be a maximum 89.2m AOD.



# 2. Relevant Legislation and Planning Policy

## LEGISLATION

- 2.1 The Environment Act (the Act) gained Royal Assent on the 9 November 2021 and is now enshrined within UK law. The Act provides a mechanism for implementing Government’s ambitions for ‘improving the natural environment’, which were previously set out in publications including the 25 Year Environment Plan (25YEP). The Act provides recognition of the 25YEP as the first “environmental improvement plan” which, through the enactment of relevant regulations serves as the basis for the steps Government intends to take to improve the natural environment. The 25YEP has now been replaced by the Environmental Improvement Plan (also referred to as the EIP23) in January 2023.
  
- 2.2 The Act implements the ambitions for an improved natural environment, by setting out statutory or legal requirements which mandate action, under the oversight of the newly formed Office for Environmental Protection (OEP). The focus of the Act is the “...provision [of] targets, plans and policies for improving the natural environment...” and its requirements are structured around a number of broad themes. Of relevance to this report Part 6 of the Act sets out provisions for ‘Biodiversity gain as condition of planning permission’.
  - The Environmental Targets Regulations 2023 – a series of statutory instruments covering particulate matter, marine protected areas, water, waste, biodiversity and woodland/trees; and
  - The Environmental Commencement Regulations – which specify the date that provisions within the Environment Act come into force and provide further detail to support practical implementation such as the issuing of guidance.
  
- 2.3 Of these, at the time of writing, the environmental commencement regulations that implement Part 6 of the Act supporting Biodiversity gain as a condition of planning permission are yet to be published. These amendments to the Town and Country

Planning Act 1990 will in future (expected to be by January 2024) require planning applications to be supported with additional information on the change in the biodiversity value attributed to a project, with requirements for planning applications to be supported by a Metric calculation, and Biodiversity Gain Plans (BGP). Planning authorities will be required to consider these submissions in the exercise of their planning functions, to ensure that they are approved, secured and where relevant registered.

- 2.4 While the Environment Act is now part of UK law, its required actions do not commence either directly or immediately, for all parties. While some of the secondary legislation supporting the Act has now been published, there remain a range of preparatory actions that need to be undertaken before full implementation of the wider legal framework (secondary legislation or regulations) will take place.

#### NATIONAL PLANNING POLICY

- 2.5 The National Planning Policy Framework (Department for Levelling Up, Housing & Communities, 2023) referred to as the NPPF from this point, requires public authorities to contribute to and enhance the natural and local environment including by minimising impacts on and providing net gains for biodiversity when taking planning decisions. The Environment Act 2021 has strengthened the duty to conserve biodiversity within the Natural Environment and Rural Communities Act 2006, such that all public authorities are required to conserve and enhance biodiversity.

## 3. Methodology

### KEY CONCEPTS

3.16 Natural England advise that the Metric “can be used or specified by any development project, consenting body or landowner that needs to calculate biodiversity losses and gains for terrestrial and/or intertidal habitats”. It has become the standardised way of describing biodiversity change in England, noting that there are a limited number of local exceptions to its use.

3.17 The Metric uses a comparison of habitats as a proxy for biodiversity and describes these habitats using standard units referred to as Biodiversity Units (BU). There are 3 distinct types of BUs, and these are not equivalent or interchangeable, they are:

- **Habitat BU** – describe areas of habitat based on measurement in hectares;
- **Hedgerow BU** – describe linear hedgerows and lines of trees measured in kilometres; and
- **Watercourse linear BU** – describe linear rivers and streams measured in kilometres.

### DEFINITIONS

3.18 In the context of this project, we have assumed the following definitions:

*‘Biodiversity Net Gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand.’*

3.19 Under the Act the relevant percentage for Biodiversity Net Gain is a change in value attributed to a development  $\geq 10\%$  the pre-development value (of on-site habitats). It should be noted that while the Act sets out the relevant percentage for Biodiversity Net Gain, the relevant parts of the Act (Section 98 and Schedule 14) are still subject to implementation through secondary legislation before they formally apply to applications.

3.20 In the interim, clarification of requirements for BNG have been set out through recent appeal decisions (Planning Inspectorate, 2022) which have clarified that:

- “the 10% biodiversity net gain requirement set out in the Act is not yet law ...”;
- “Paragraph 174 of the Framework [the NPPF encourages applicants to], ... seek a net gain in biodiversity without identifying a specific percentage...”
- The relevant Core Strategy may “...seek a net gain in biodiversity without identifying a specific percentage...”; and
- “A net gain of just 1% would be policy compliant in these circumstances.”

### METRIC CALCULATION

3.21 In informing the assessment of biodiversity changes this report refers to:

- the Metric;
- the Metric User Guide; and
- the Metric - Technical Supplement.

3.22 UKHab habitat survey information has been used to inform the assessment of biodiversity changes. The results have been converted using the Metric G-1 All Habitats tab to the appropriate Metric Group and Metric Habitat. A full description of baseline habitats is provided in [Schofield Lothian, 2022].

1.14 The results are influenced by:

- Distinctiveness (an indication of value);
- Condition – an indication of quality;
- Strategic significance – significance of the habitat based on its location and habitat type is considered locally ecological important;
- Multipliers or risk factors – that take account of the difficulty of habitat creation/management;
- the Metric User Guide; and

- Multipliers or risk factors – that take account of the difficulty of habitat creation/management, the time it takes to deliver and variation in the location of habitat delivery.

3.23 Given that the Metric ‘tree helper’ provides outputs to four decimal places and all Metric calculations are reported to two decimal places a default maximum four decimal places have been used for consistency in data entry. This level of mapping is consistent with the minimum mappable area of 5m<sup>2</sup> used within the UKHab survey.

### METRIC PRINCIPLES AND RULES

3.24 Natural England advise that the Metric is a tool that helps inform plans and decisions, by using habitats as a proxy for measuring biodiversity value, but that any assessment must be undertaken with awareness of its limitations. The metric specifically requires interpretation and ecological expertise to provide evidence of the appropriateness of proposed approaches to BNG and sets out a series of key principles and rules that help to inform an understanding of whether proposals meet wider considerations than a calculation output. A summary of the rules and principles is provided in Appendix 2.

### ASSUMPTIONS AND LIMITATIONS

3.25 Where ‘creation’ is proposed professional judgement has been exercised, with reference to the ‘technical difficulty creation’ and ‘creation temporal multipliers’ data, to limit those habitats considered to have a medium or higher risk or time to target condition beyond the project timescales, to no more than 1 condition step change post-intervention. Application of this approach includes:

- ‘intensive and biodiverse green roof, other neutral grassland and urban trees’ - a default ‘moderate’ post-intervention objective can be used. If there are other factors likely to suppress condition such as recreational use or source of poor air quality this post-intervention objective would be reduced to reflect this.

- 3.26 It is also important to understand the phasing of clearance of habitats and to set reasonable assumptions about when habitat creation will take place. Where appropriate such assumptions are identified. Habitat loss/clearance is assumed to take place at the start of construction. Habitat enhancement or creation within the Site is assumed to have a 'delay in starting habitat creation' of four years for green roofs, individual trees and grassland habitats.
- 3.27 The original 2022 habitat survey did not note any limitations of relevance to this report.
- 3.28 No significant limitations were encountered during completion of the BGP. Natural England note that the Metric has been extensively tested, but that they continue to listen to feedback to support correction of any errors or problems. Natural England continue to make ongoing updates and improvements to the Metric over time. Accordingly, the calculations made in this plan may require updates to align with any future changes to the metric and best practice standards.
- 3.29 Data from habitat surveys and condition assessments should be considered to be valid for a period of 18 months to three years, unless there are any significant changes to the habitats within the Site (CIEEM, 2019). After this time, surveys should be repeated to ensure the baseline is up to date.

## 4. Minimisation of Adverse Impacts

### IRREPLACEABLE HABITAT

- 5.1 The proposed development has been informed by the production of a Preliminary Ecological Appraisal or PEA (Scofield Lothian, 2022), including an assessment of the presence of irreplaceable habitats. This confirmed that the proposed development excludes irreplaceable habitat within the on-site baseline. Numerous parcels of ancient woodland are present within 15km of the Site. However the closest is located over 8km from the Site and is separated by heavily built up urban habitats.
- 5.2 The proposed development will not lead to impacts on irreplaceable habitats.

### RETENTION OF BASELINE HABITAT

- 5.3 The proposed development has been informed by an initial habitat assessment including condition assessment. Higher distinctiveness habitats have been mapped and opportunities taken to amend the layout of the proposed development to seek to retain these habitats.
- 5.4 The proposed development will not support retention of existing on-site habitats.

### ENHANCEMENT OF BASELINE HABITAT

- 5.5 The proposed development has been informed by a habitat assessment including condition assessment and opportunity mapping. No existing habitats that might benefit from enhancement have been identified.

### CREATION OF HABITAT

- 5.6 The proposed development has been informed by a PEA which included review of relevant planning policy. The Metric assessment has recognised these strategic priorities and informed the development of post development habitats that both support the relevant level of Biodiversity Gain and wider habitat and species priorities. This includes provision of:

- Biodiverse green roof (high strategic significance);
- Intensive green roof (high strategic significance);
- Urban trees (medium strategic significance); and
- Flower rich ruderal (low strategic significance).

5.7 The provision of these habitats does not necessarily result in the highest level of biodiversity gain, but is considered realistic, achievable and to balance Metric performance and wider policy delivery.

5.8 The proposed development will deliver creation of on-site Urban (green roof), Individual trees (urban trees) and Sparsely vegetated (ruderal) habitats.

#### **HABITAT EXTENT AND SIZE**

5.9 The proposed development has taken opportunities to increase habitat extent and size to maintain ecological connectivity and functionality, including through intensive and biodiverse green roofs, urban trees and flower rich grassland.



## 5. Baseline Habitats

### BASELINE HABITATS

- 5.1 A full description of the baseline habitats within the Site and their condition are provided within the PEA Report (Schofield Lothian, 2022). Results of the habitat survey are described in full in that report and illustrated in (Appendix 1, Figure 1].
- 5.2 The existing (pre-development) habitat on the Site consisted of Heathland and Scrub (bramble scrub) and Urban (developed land, sealed surface) habitats. No hedgerows or watercourses habitats were present.
- 5.3 Existing baseline habitats were assessed using the habitat specific Condition Assessment Table and were evaluated to meet the relevant number of criteria to inform allocation.
- 5.4 A summary of the pre-development position is given in Table 5.1.

**Table 5.1: Summary of On-site Baseline Habitats**

Broad Habitat Type	Habitat Condition	Area (ha)/ Length (km)	BU
<b>Area Habitats</b>			
Heathland and shrub (bramble scrub)	N/A	0.0474	0.19
Urban (developed land, sealed surface)	N/A	0.3586	0.00
<b>Site Total</b>		<b>0.41</b>	<b>0.19</b>

- 5.10 Full descriptions of the on-site habitats can be found in the PEA (Schofield Lothian 2022).

5.11 Full details of the calculations can be found within the Metric Calculation Tool spreadsheet.

5.12 A summary of the current baseline biodiversity value to 2 decimal place is given in Table 5.2.

**Table 5.2: Summary of Baseline Habitat Value**

Biodiversity Unit Type	Area (ha)/ Length (km)	Baseline Units		Total BU
		On-site	Off-site	
Area Habitats	0.41	0.19	0	0.19
Linear habitat - hedgerows	N/A	N/A	N/A	N/A
Linear habitat - rivers and streams	N/A	N/A	N/A	N/A

## 6. Post Intervention Habitats

### METRIC CALCULATION

- 8.1 Biodiversity calculations have been completed to compare the current Site baseline with the proposed future development scenario, which is illustrated in [Appendix 1, Figure 2]. This provides a map of the habitats that are proposed post-development, from which the performance of the development can be calculated using the Metric.
- 8.2 In line with Metric 4.0 a comparison has been made between the on-site baseline and the proposed on-site and off-site post-development habitats. No calculation has been undertaken of off-site baseline as post-development measures will be limited to the Site boundaries.

### INTERVENTION TYPES

- 8.3 Post intervention changes will take place through:
- permanent physical footprint of construction works including buildings and infrastructure;
  - temporary physical footprint of construction works including material and vehicle storage areas;
  - removal of baseline habitats, with replacement of habitats with a similar level of distinctiveness but not within the same broad habitat type. This includes an area of 'bramble scrub' present in the baseline;
  - creation of habitats. This includes the creation of neutral grassland and individual trees in the south of the Site to provide habitat diversity and increased connectivity through the Site. Additional benefit will be provided by the installation of areas of intensive and biodiverse green roof on the new building.

## CURRENT SITE BASELINE TO PROPOSED HABITATS POST-INTERVENTION

### Area Habitats

- 8.4 Post intervention the proposed development is predicted to lead to the creation of 0.16ha of habitat. The largest increase in habitat area is estimated to take place in Urban (green roof) habitats (0.14ha), followed by Individual trees (0.02ha of tree equivalent area). The largest decrease (removal) in habitat area will take place in Heathland and Scrub habitats (0.05ha).
- 8.5 On-site planned creation of biodiverse and intensive green roof, and individual trees offers the greatest opportunity for change in biodiversity value, supporting an estimated increase of 0.61 habitat BU through increases in the area of these habitats. Further biodiversity change is predicted to result from the creation of flower rich ruderal in the west of the Site. This will result in an opportunity for change in biodiversity value, supporting an estimated increase of 0.01BU through increases in the area, distinctiveness and condition of the habitats created.

### Overall

- 8.6 A summary of the proposed changes, through creation of habitats, that the proposed development deliver would lead to a post-intervention overall value of 0.70BU. This post-intervention position is summarised in Table 6.1.

**Table 6.1: Summary of Post-intervention Habitat Value**

Biodiversity Unit Type	Area (ha)/ Length (km)	Post-intervention Units		Total BU
		On-site	Off-site	
Area Habitats	0.41	0.69	0.00	0.69
Linear habitat - hedgerows	N/A	N/A	N/A	N/A
Linear habitat – rivers and streams	N/A	N/A	N/A	N/A

# 7. Overall Habitat Change

7.1 The proposed development would result in an estimated loss of 0.19 baseline habitat BU on-site and an estimated creation of 0.69 post intervention habitat BU on-site. Overall the proposed development would therefore lead to a predicted increase of 0.50BU through on-site changes. This project would deliver an increase in the habitat biodiversity value of approximately 261.82%.

7.2 The proposed development, as illustrated in the drawing included in Appendix 1, will inform changes in habitat area above 10%, which satisfies the current requirement for biodiversity enhancement under the National Planning Policy Framework and the future ambition set out within the Environment Act]. This level of performance relies on the creation of habitats and planting of scattered trees on-site. An overall summary of the proposed biodiversity gain is given in Table 7 1.

**Table 7.1: Summary of Proposed Biodiversity Gain**

Biodiversity Unit Type	Baseline Units		Post-intervention Units		Total Net Unit Change	% Net Change
	On-site	Off-site	On-site	Off-site		
Area Habitats	0.19	0	0.69	0	0.50	261.82%
Linear habitat - hedgerows	N/A	N/A	N/A	N/A	N/A	N/A
Linear habitat - rivers and streams	N/A	N/A	N/A	N/A	N/A	N/A

## 8. Conclusions

8.1 The assessment of the proposed development against the current baseline indicates that an increase in biodiversity performance of the Site of approximately 261.82% in habitat can be achieved. This is subject to appropriate planting plans and management plans being developed to optimise the delivery of biodiversity performance on the Site and within the wider land-holdings and to realise its intended out-turn condition.

8.2 In reaching this conclusion, the relevant Metric 1, 2, 4 and 5 rules have been followed and inform a claim of achievement by the project of net gain. The project does not currently conform with the requirements of Metric rule 3. Specifically

- **Rule 1:** the qualifications and experience of the author(s) of this report are set out in Paragraph 1.9. This is considered sufficient to meet competency requirements.
- **Rule 2:** the assessment has been undertaken using the extant version (at the time of the assessment) of the Metric and full details of this are provided in Paragraph 3.21. Full reporting is provided on each of the relevant BU types. This is considered sufficient to meet the Rule 2 requirements.
- **Rule 3:** the proposals do not adhere to the Metric trading rules as there is a deficit in like for like medium distinctiveness broad habitat units (including higher distinctness surplus). The loss of heathland and shrub (bramble scrub) results in a loss of 0.19 habitat BU. The loss of these habitats is associated with unavoidable elements of the proposed development in order to provide the required areas of building and trees. In addition the scrub is in poor condition with invasive species such as Japanese knotweed present. The Applicant will seek to address this during detailed design and may potentially require offsite units. As such the project does not meet the standards for Rule 3.

- **Rule 4:** the Metric that supports this plan confirms the absence of irreplaceable habitats on-site at the baseline. that trading rules have been met. This is considered sufficient meet the Rule 4 requirements.
- **Rule 5:** this plan confirms adoption of and compliance with the extant version of the Metric and deviation from this metric methodology is not relied upon. This is considered sufficient meet the Rule 5 requirements.

8.3 This is considered to satisfy the current requirement for biodiversity enhancement under the National Planning Policy Framework and the future ambition set out within the Environment Act.

8.4 While the metric does not explicitly consider the biodiversity value provided by individual species relevant to the Site, consideration is given to these locally relevant species to ensure that the Site provides continued opportunities for them.

8.5 The net gains predicted in this plan will rely on the development of a Habitat Management and Monitoring Plan (HMMP) that sets out landscape planting/site management actions intended to secure the predicted level of biodiversity delivery.

8.6 A summary Biodiversity Gain Plan has been included in Appendix 3. This document has adopted the draft guidance issued by DEFRA (2023).

## 9. Recommendations

9.1 This plan sets out realistic proposed habitats and outturn conditions for those habitat parcels. The reported level of biodiversity delivery is reliant upon a number of actions likely to be required to inform the relevant planning process. These actions should include:

- appropriate commitments, mechanisms and evidence that secure the predicted level of biodiversity delivery over a period of at least 30 years;
- production of a Habitat Management and Monitoring Plan (HMMP) that sets out landscape planting/site management actions that secure the predicted level of biodiversity delivery;
- reflection of the HMMP within contractual agreements for the future management of the site.

9.2 Trading rules are not currently met and in order for these rules to be met the following amendments would need to be made, either:

- **Medium distinctiveness habitats**– the creation of such habitats, including heathland and shrub broad habitat types [0.19 BU]; or
- **High distinctiveness habitats** - the creation or enhancement of higher distinctiveness habitat following the trading up principle..

9.3 Should any amendments be made to satisfy trading rules, the proposed habitat retention, enhancement and creation measures should be subject to review by the wider project team and any temporary or permanent change to these measures should be reviewed and the BGP updated.



# References

Baker, J., Hoskin, R. and Butterworth, T. (2019). Biodiversity Net Gain Good Practice Principles for Development. CIRIA, London.

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# Appendix 1: Habitat Maps and Site Plan

FIGURE 1 – Baseline Habitat (UKHab) Map

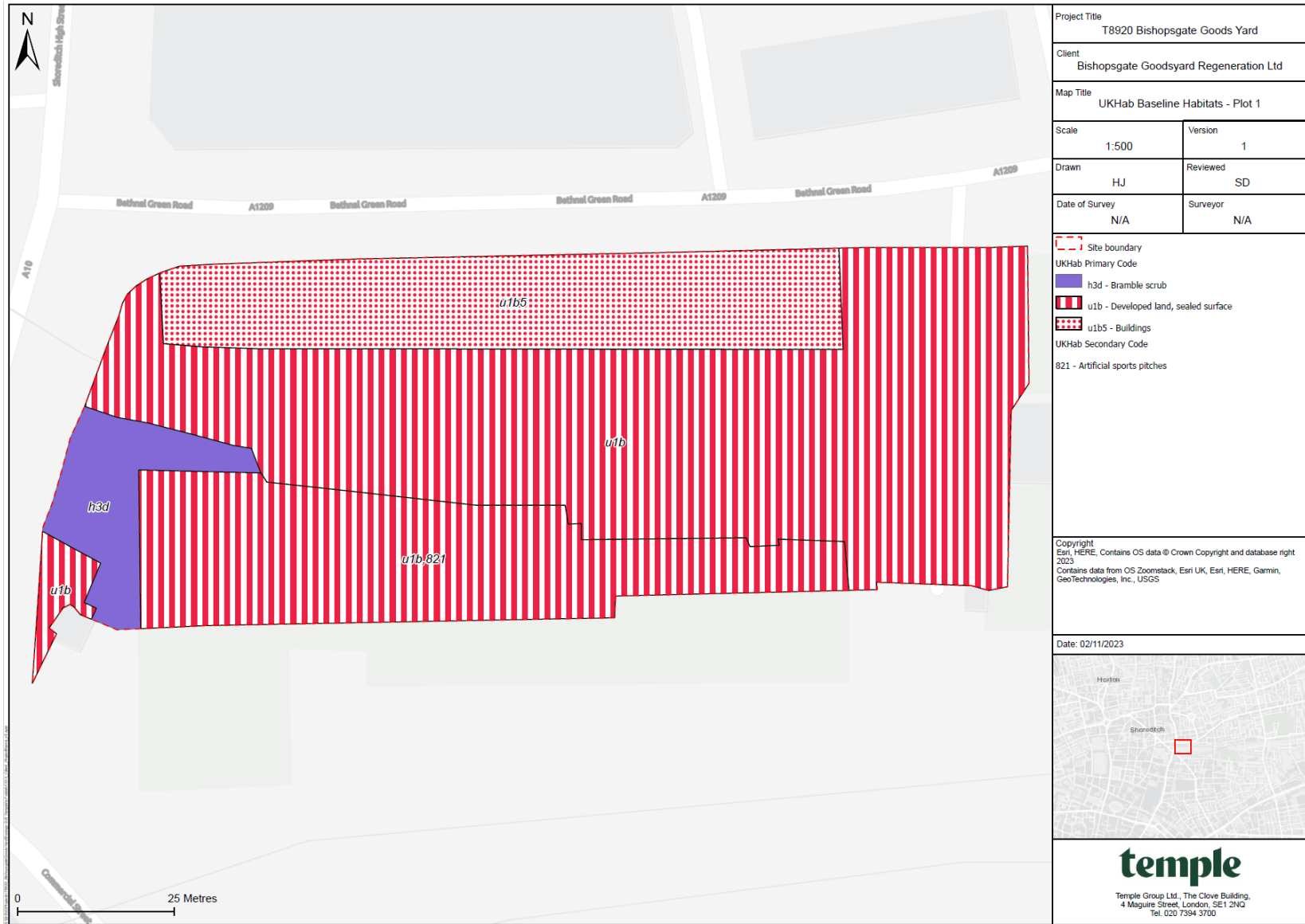
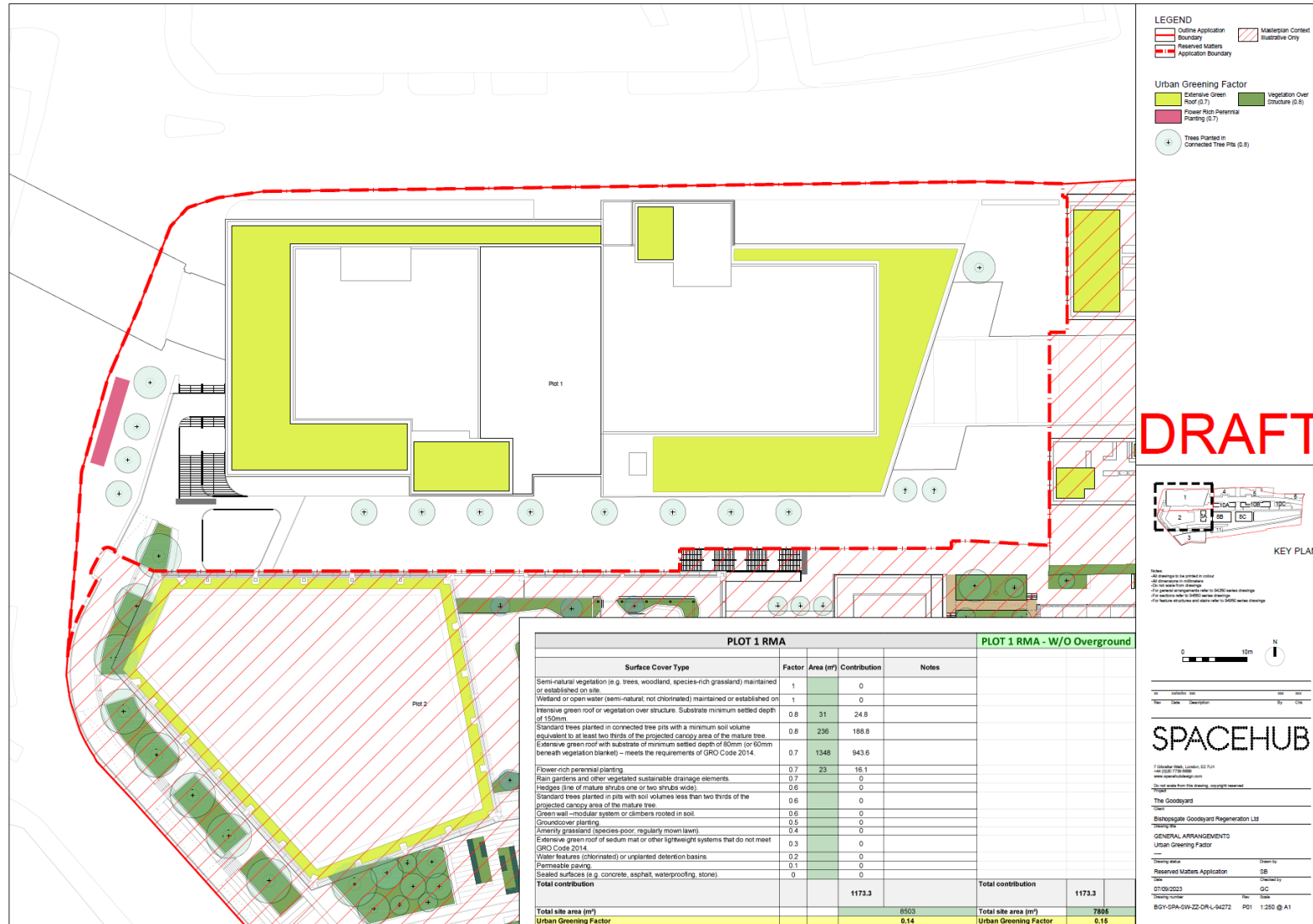


FIGURE 2 – Proposed Development Habitat Map



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## Appendix 2: Summary of Metric Rules and Principles

# Metric Rules and Principles

The Metric 4.0 User Guide indicates that a number of rules must be followed in applying the Metric in order to inform a claim of achievement by a project of gain in biodiversity.

These are:

- **Rule 1:** Competency requirements must be complied with.
- **Rule 2:** Biodiversity unit outputs are unique to this metric. The results of other metrics, including previous versions of this metric, are not comparable to those of this metric. The three types of biodiversity units generated by this metric (area, hedgerow and watercourse) cannot be summed, traded, or converted between modules.
- **Rule 3:** 'Trading down' must be avoided. Losses of habitat are to be compensated for on a "like for like" or "like for better" basis. New or restored habitats should aim to achieve a higher distinctiveness and/or condition than those lost. Losses of irreplaceable or very high distinctiveness habitat cannot adequately be accounted for through the metric.
- **Rule 4:** Losses and deterioration of irreplaceable or very high distinctiveness habitat cannot be accounted for through this metric.
- **Rule 5:** In exceptional ecological circumstances, deviation from this metric methodology may be permitted by the relevant consenting body or planning authority. Any deviation must be fully justified and evidenced, and follow advice set out in in the 4.0 Metric guidelines.

In addition, the User Guide indicates that assessments should be informed by:

- **Principle 1:** The metric does not change the protection afforded to biodiversity. Existing levels of protection afforded to protected species and habitats are not changed by use of this or any other metric. Statutory obligations will still need to be satisfied.
- **Principle 2:** This metric should be used in accordance with established good practice guidance and professional codes.

- **Principle 3:** This metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
- **Principle 4:** Biodiversity units are a proxy for biodiversity and should be treated as relative values.
- **Principle 5:** This metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.
- **Principle 6:** Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
- **Principle 7:** Created and enhanced habitats should seek, where practical and reasonable, to be local to any impact and deliver strategically important outcomes for nature conservation.
- **Principle 8:** The metric does not enforce a minimum habitat size ratio for compensation of losses. However, proposals should aim to:
  - maintain habitat extent (supporting more, bigger, better and more joined up ecological networks); and
  - ensure that proposed or retained habitat parcels are of sufficient size for ecological function.

The Metric guidance also confirms that for irreplaceable habitats:

- **Irreplaceable habitats** – the Metric does not adequately measure impacts on irreplaceable habitats and separate consideration should comply with up-to-date policy, legislation and regulations. All irreplaceable habitats must be recorded in the irreplaceable habitat sheet within the metric.
- **Very high distinctiveness habitats** (VHDH) - should be considered and recorded in line with irreplaceable habitat requirements.
- **Ancient woodland** – Ancient woodland (an irreplaceable habitat) is not a discrete habitat type and, as such, is not listed in the metric. Ancient woodland encompasses ancient semi-natural woodlands (ASNW), plantations on ancient woodland sites (PAWS) and ancient wood-pasture and parkland. These habitats may fit a range of



metric woodland habitat types. If a woodland is less than 2ha, check against the criteria set out in the Ancient Woodland Inventory Handbook.

- **Ancient and veteran trees** – wherever ancient and veteran trees occur they should be considered and recorded as irreplaceable habitat.

# Appendix 3: Summary Biodiversity Gain Plan

# Summary Biodiversity Gain Plan

<b>A. Details of submission</b>	
1. Date of submission	DD/MM/YYYY
2. Planning application reference number	
3. Local Planning Authority	LB Hackney and LB Tower Hamlets
4. Development site address or site description	Bishopsgate Goodsyard Plot 1
5. Description of development to which the Biodiversity Gain Plan relates	Proposals for the Site included the clearance of existing vegetation and the construction of a building comprising of office space and ground floor retail floorspace. The height of the building is proposed to be 12-16 storeys currently envisaged to be a maximum 89.2m AOD
<b>B. Applicant responsible for submission of the biodiversity gain plan</b>	
6. Name	
7. Organisation	
8. Address	
9. Email address	
10. Telephone number	
11. Declaration	<p>I/we hereby submit our biodiversity gain plan as described in this form. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.</p> <p>Signed: Date:</p>
<b>C. Person responsible for completion of the biodiversity gain plan</b>	
12. Name	Sasha Dodsworth
13. Organisation	Temple
14. Address	3 <sup>rd</sup> Floor, The Clove Building, 4 Maguire Street, London, SE1 2NQ
15. Email address	Sasha.dodsworth@templegroup.co.uk
16. Telephone number	020 7394 3700
17. Declaration	

I/we hereby submit our biodiversity gain plan as described in this form. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.

Signed:



Date:

20/11/23

#### D. Biodiversity Net Gain strategy

18. Please select the local plans or strategies used to inform strategic significance of habitats	Local Plan X Local Nature Recovery Strategy <input type="checkbox"/> Green Infrastructure <input type="checkbox"/> Landscape Plan <input type="checkbox"/> Spatial Plan <input type="checkbox"/> Network Enhancement and Expansion Zones <input type="checkbox"/> Other <input type="checkbox"/> Please provide details here <a href="#">Guidance link</a>
19. Please explain how you have met the 'what counts towards your BNG' guidance	Rules 1, 2, 4 and 5 have been met has per the wording within Paragraph 8.2 of the BGP (Temple 2023).
20. Set out the steps taken on-site to avoid impacts to habitats and/or minimise impacts to habitats including irreplaceable habitats where on site	Further measures are required to meet Rule 3 (trading standards) in order to replace the scrub habitat type lost as part of the proposed development.
21. How are you delivering the target net gain percentage?	Only onsite X Only offsite <input type="checkbox"/> Both <input type="checkbox"/>
22. Are any of your on-site enhancements considered "significant"?	Yes X No <input type="checkbox"/>
23. If yes, provide details of the significant enhancement and appropriate planning condition or obligation to secure its long-term management.	The creation of both biodiverse and intensive green roofs are being included as per Tower Hamlets Policy D.ES3 and Hackney Policy LP46

24. How many Biodiversity Units are needed off-site to meet the required net gain percentage?	None, However, 0.19 units are required offsite to meet the trading standards for scrub habitats	
25. Rationale for proposed off-site delivery (if applicable)		
26. Rationale for proposed use of Statutory biodiversity credits (if applicable).		
27. Do you have a habitat management and monitoring plan in place?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
28. Have you used the statutory biodiversity metric?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
29. Completed biodiversity metric tool	8920-Bishopsgate Plot 1-Biodiversity Metric 4.0 Calculation Tool	
30. Condition assessments	N/A	
31. Pre-development habitat survey report and map	File name and web link if available	
32. Post-development habitat map or landscape plan	Drawing ref: BGY-SPA-SW-ZZ-DR-L-94272	
33. Has any approved habitat degradation been included in the baseline? If yes, include any relevant consenting body and reference number.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Consenting body:  Reference number:
<b>E. Are any of the below being impacted as part of the development – if so, have you submitted a compensation plan to meet other existing biodiversity obligations to the Local Planning Authority?</b>		
34. Irreplaceable habitats	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	I have submitted an approved compensation plan <input type="checkbox"/> I have not submitted an approved compensation plan <input type="checkbox"/>
35. Very high distinctiveness habitats	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	I have submitted an approved compensation plan <input type="checkbox"/> I have not submitted an approved compensation plan <input type="checkbox"/>

<b>F. On-site habitat enhancements (if required)</b>			
36. Survey date(s)			
37. Survey constraints			
38. Total pre-development biodiversity value (in BU)		39. Total post-development biodiversity value (in BU)	
Number of area habitat Biodiversity Units	0.19	Number of area habitat Biodiversity Units	0.69
Number of hedgerow Biodiversity Units	0	Number of hedgerow Biodiversity Units	0
Number of watercourse Biodiversity Units	0	Number of watercourse Biodiversity Units	0
40. Total net change in Biodiversity Units			
Area habitat Biodiversity Units	0.50	261.82%	
Hedgerow Biodiversity Units	0	0	
Watercourse Biodiversity Units	0	0	
41. Will Biodiversity Units being delivered on any part of your site be registered and allocated to other developments? If yes or provisionally, please provide details	Yes <input type="checkbox"/> Please provide details here  Provisionally, not yet confirmed <input type="checkbox"/>  No X		
<b>G. Off-site habitat enhancements (if required)</b>			
42. Please give details of the off-site habitat enhancement being proposed			
43. Biodiversity Gain Site Register reference number(s)			
44. How have off-site habitat enhancement proposals been secured?		S106 <input type="checkbox"/> Conservation Covenant <input type="checkbox"/> Provide details of responsible body:	
45. Total pre-development biodiversity value (in BU)		46. Total post-development biodiversity value (in BU)	
Number of area habitat Biodiversity Units	Insert units	Number of area habitat Biodiversity Units	Insert units
Number of hedgerow Biodiversity Units		Number of hedgerow Biodiversity Units	

Number of watercourse Biodiversity Units		Number of watercourse Biodiversity Units	
<b>47. Total net change in Biodiversity Units</b>			
Area habitat Biodiversity Units	Inserts units	Insert %	
Hedgerow Biodiversity Units			
Watercourse Biodiversity Units			
<b>H. Statutory biodiversity credits</b>			
48. Are Statutory biodiversity credits required? If yes, please complete section 49 - 51	Yes <input type="checkbox"/> No <input type="checkbox"/>		
49. How many Statutory biodiversity credits are required?	Tier	Unit shortfall by tier (spatial risk multiplier included)	
	A1		
	A2		
	A3		
	A4		
	A5		
	H		
50. What evidence is there that no units are available through the market?			
51. Proof of purchase	Provide link and reference number		
<b>I. Trading summary</b>			
52. Distinctiveness group	Trading satisfied?	If no, has bespoke compensation been agreed?	
Very high	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
High	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Medium	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Low	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>	
<b>J. TBC Sharing data (not mandatory)</b>			
53. Will you share relevant ecological survey data with the appropriate Local Environmental Records Centre (LERC) or any other bodies?			





- **London: 3rd Floor, The Clove Building, 4 Maguire Street, London, SE1 2NQ. T: +44 (0)20 7394 3700**
- **Haywards Heath: Unit 6 Basepoint; John De Mierre House, 20 Bridge Road, Haywards Heath, RH16 1UA. T: +44 (0)20 7394 3700**
- **Lewes: 3 Upper Stalls, Iford, Lewes, East Sussex, BN7 3EJ. T: +44 (0) 1273 813739**
- **Lichfield: 1-2 Trent Park, Eastern Avenue, Lichfield, Staffordshire, WS13 6RN. T: +44 (0)1543 229049**
- **Manchester: Express Building, 3 George Leigh Street, Manchester, M4 5AD. T: +44 (0)161 509 4900**
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