

BIODIVERSITY NET GAIN STRATEGY

This statement outlines London Squares strategy and aspirations to achieve a minimum biodiversity net gain (BNG) of 15% across our development portfolio, supporting our strategy of increasing sustainability across our developments. This target exceeds Natural England's minimum target of 10%.

MITIGATION HIERARCHY

London Square will follow a mitigation hierarchy from site acquisition to delivery. The hierarchy is the cornerstone of achieving BNG.

Avoidance: This first stage is to avoid harm to biodiversity, for example, by locating to an alternative site. London Square will assess each site with this in mind and ensuring this is factored into the acquisition stage, as part of the sustainability risks considered by the Land Acquisition Checklist.

Minimisation: If avoiding all adverse effects is not possible, action is taken to minimise these effects, which can include timing construction to avoid periods which may have a more adverse effect on the biodiversity present.

Compensation: Addressing residual adverse effects is the final stage, only considered after all possibilities for avoiding and minimising the effects have been implemented. Compensation does not prevent the effects, rather it involves measures to make up for residual effects that cannot be prevented. Notwithstanding this, opportunities to enhance biodiversity and ecology on site will be explored on all sites as part of London Square's wider sustainability objectives as outlined in the Design and Sustainability Checklist.

OFFSETTING

Offsetting is a form of compensation that trades losses of biodiversity in one location with measurable gains in another. Biodiversity offsets have a formal requirement for measurable outcomes. Off-setting losses of biodiversity with gains elsewhere can be within or outside of the development footprint. London Square are committed to achieving the Company's Biodiversity Net Gain target without the use of external offsets.

PRE-ACQUISITION APPROACH

Prior to acquiring a site, or an option on a site an assessment of its baseline unit value will be completed as part of the evaluation process (including hedgerow and river units where applicable).

Where the assessment is not supplied by the current landowner/agent, it will be completed by London Square's ecological consultant, on the Company's behalf.

The land acquisition team must ensure that there is potential to achieve the Company BNG target. They must allow for the financial value of biodiversity units, as well as potential costs associated with any protected species issues.

The Company aims ensure that no sites are procured which include higher value habitats that cannot be entirely retained as part of a development.

Higher value habitats include but are not limited to: ancient woodland, un-improved grassland and heathland. However, where sites are available which include higher value habitat that could be entirely retained as part of a successful development site these could contribute to a target where on-site enhancement is possible. Larger sites should always be treated with extra caution where the majority of the site is anything other than buildings and/or hardstanding.

ACHIEVING 15% NET GAIN

Baseline units can be assessed at any time, losses or gains require that sufficient detail of the landscape scheme is available. For this reason, outline applications are excluded from targets. These should then be included at the full application or reserved matters stage. It is noted that the majority of London Square developments start as full planning applications, but this is not always the case.

Typical London Square projects are often urban 'brownfield' sites, these have been previously developed and have an existing or redundant uses. These are most often of very low, or low biodiversity value and there will usually be a good chance of achieving a significant net gain. Many of these sites are relatively small (less than one hectare).

However, some projects could lead to an overall net loss. In these exceptional instances, London Square would seek to offset any loss by exceeding the 15% target by an equivalent or increased extent on another London Square site, using a centralised approach.

To Deliver BNG on site, London Square will work from acquisition to delivery with ecologists, arboriculturist and landscape architects to implement the below design principals where possible:

- where flat roofs are proposed a green roof will be considered;
- new streets will be tree-lined and that all opportunities are taken to incorporate trees elsewhere in the development;
- appropriate measures are in place to secure the long-term maintenance of newly- planted trees;
- existing trees will be retained wherever possible - specifically if classified as Category A or B. London Square will achieve a net uplift of trees on site with the proposals in place;
- provision of roost sites for bats and use of sensitive lighting;
- tree planting, planting of wildlife encouraging plants and wall climbers;
- providing nesting boxes and/or swift bricks to encourage new populations of birds;
- supplying feeding areas for birds and/or bats as part of the landscaping;
- installation of bug hotels;
- use of bee friendly and drought tolerant planting;
- peat-free landscaping; and
- Implementation of an ecology and biodiversity maintenance plan.