

# Biodiversity Exemption and Enhancement Statement

**107 Mayes Road, London N22**

***Including Bauder Extensive Modular Green Roof (BROOF(t4))***

This reads like a consultant-grade report suitable for your DAS, Planning Statement, or standalone submission. It is long, detailed, and defensible.

## **1. Introduction**

This Biodiversity Exemption and Enhancement Statement has been prepared in support of the planning application for **107 Mayes Road, London N22**, relating to the construction of **two additional storeys (3rd and 4th floor extensions)** to create **four self-contained residential flats**. The purpose of this document is twofold:

1. **To justify exemption** from conventional biodiversity measures that are not feasible or proportionate for this type of high-level, fully urban, vertical extension; and
2. **To demonstrate a positive biodiversity enhancement**, appropriate to the site's constraints, through the introduction of a **Bauder extensive modular green roof system**, compliant with **BROOF(t4)** fire performance requirements.

This statement responds to relevant national, regional and local policy expectations, including the London Plan's emphasis on urban greening and proportionate biodiversity improvements.

## **2. Existing Site Conditions**

### **2.1 Site Character**

The site at **107 Mayes Road** is located within a dense urban environment characterised by modern mixed-use buildings, hard landscaping, and limited ecological features. The plot includes:

- A **modern building** occupying the majority of the site;
- A **small driveway area** consisting entirely of hardstanding;
- **No soft landscaping**, planting, or natural ground;
- **No trees, shrubs, or grassed areas**;
- **No water features** or ecological corridors.

The site therefore supports **no meaningful biodiversity value** in its existing condition.

## 2.2 Absence of Ecological Features

A review of the site confirms:

- No nesting opportunities for birds;
- No roosting potential for bats;
- No terrestrial habitat for hedgehogs or small mammals;
- No vegetation capable of supporting pollinators;
- No soil-based habitat of any kind.

The site is entirely urban in character and offers **no ecological receptors** that could be affected by the proposed development.

## 3. Description of the Proposed Development

The proposal involves the construction of **3rd and 4th floor extensions** above the existing building to create **four new residential units**. Key characteristics include:

- **Vertical extension only** — no increase in footprint;
- **No ground-level works;**
- **No excavation, landscaping removal, or disturbance of natural ground;**
- All works confined to the **upper levels** of the building.

As a result, the development has **no direct or indirect impact** on any existing biodiversity features.

## 4. Biodiversity Impact Assessment

### 4.1 No Habitat Loss

Because the site contains **no vegetation or natural habitat**, the proposal results in:

- **No loss of biodiversity;**
- **No displacement of species;**
- **No reduction in ecological value.**

The development is therefore **neutral** in biodiversity terms.

## 4.2 No Impact on Surrounding Ecology

The surrounding area is similarly urban, with no ecological designations or sensitive habitats nearby. The proposed extensions:

- Do not overshadow any green spaces;
- Do not alter drainage patterns affecting habitats;
- Do not create light spill affecting wildlife;
- Do not introduce noise or disturbance relevant to ecology.

The proposal is therefore **ecologically benign**.

## 5. Justification for Biodiversity Exemption

Although biodiversity enhancements are encouraged by planning policy, they must be **proportionate**, **feasible**, and **appropriate** to the nature of the development.

For this site:

### 5.1 High-Level Extensions

The works occur at **3rd and 4th floor level**, well above typical ecological activity zones.

### 5.2 Modern Façade

The building's smooth, contemporary façade is unsuitable for:

- Bird boxes
- Bat boxes
- Bee bricks
- Nesting features

These would not function effectively at this height or in this context.

### 5.3 No Ground-Level Opportunities

The site has:

- No garden
- No soil
- No planting areas
- No space for hedgehog gaps or terrestrial habitat

Ground-level biodiversity measures are therefore **not possible**.

#### **5.4 No Ecological Connectivity**

The site is isolated from green corridors, meaning conventional enhancements would provide **no meaningful ecological benefit**.

#### **Conclusion of Exemption**

The site qualifies for **exemption from standard biodiversity measures** due to:

- Lack of existing habitat
- Lack of feasible enhancement locations
- Height and nature of the extension
- Fully urban, hard-surfaced context

#### **6. Proposed Biodiversity Enhancement: Bauder Extensive Modular Green Roof**

Despite qualifying for exemption, the applicant proposes a **proportionate and deliverable biodiversity enhancement** through the installation of a **Bauder extensive modular green roof system**.

##### **6.1 System Specification**

The proposed green roof will be:

- A **Bauder extensive modular tray system**;
- Planted with **sedum species** suitable for urban roofs;
- Installed as a **non-accessible, low-maintenance** feature;
- Fully compliant with **BROOF(t4)** fire performance requirements;
- Lightweight and compatible with the structural design of the vertical extension.

##### **6.2 Ecological Benefits**

The green roof will:

- Introduce nectar-rich planting;
- Support pollinators such as bees and hoverflies;
- Provide seasonal flowering and micro-habitat creation;
- Contribute to urban greening in a dense built-up area;

- Improve rainwater attenuation and reduce runoff;
- Enhance visual amenity from upper-floor viewpoints.

### 6.3 Proportionate Enhancement

Given the site's constraints, the green roof represents:

- A **realistic** enhancement;
- A **policy-aligned** measure;
- A **meaningful ecological uplift**;
- A **feasible and technically appropriate** intervention.

## 7. Policy Alignment

The proposed enhancement aligns with:

### London Plan

- **Policy G5 – Urban Greening**
- **Policy G6 – Biodiversity and Access to Nature**

### Haringey Local Plan

- Sustainable design and construction policies
- Biodiversity enhancement principles for minor developments

### NPPF

- Paragraphs encouraging biodiversity net gain “where possible and proportionate”

The green roof satisfies these requirements in a manner appropriate to a **minor vertical extension**.

## 8. Conclusion

The proposed development at **107 Mayes Road, N22** results in **no loss of biodiversity**, as the site contains no existing habitat and the works do not affect the ground plane.

Conventional biodiversity measures are **not feasible or appropriate** due to the height, modern façade, and fully urban nature of the site.

Nevertheless, the scheme delivers a **positive and proportionate biodiversity enhancement** through the installation of a **Bauder extensive modular green roof**, providing ecological value in a manner consistent with planning policy and site constraints.

The development therefore achieves a **net positive contribution to biodiversity**, while remaining technically feasible, fire-compliant, and appropriate for a minor development in an urban context.