MKA
ECOLOGY

Nocturnal Bat Survey

81 Belsize Park Gardens, Belsize Park, London, NW3 4NJ

Site	*81 Belsize Park Gardens, Belsize Park, London, NW3 4NJ*
Project number	*140623*
Client name / Address	*Fine Arts College Ltd, Centre Studios, 41-43 Englands Lane, London, NW3 4YD*

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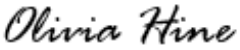
Surveyor(s)	*Alisa Davies Qualifying CIEEM* *Olivia Hine Qualifying CIEEM*	 
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Declaration of compliance

This Nocturnal Bat Survey has been undertaken in accordance with British Standard 42020:2013 “Biodiversity, Code of practice for planning and development”.

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

For sites that require a European Protected Species Licence in respect of bats, the licensing authority in England (Natural England) will expect data from the most recent survey season. Where an absence of roosting bat is indicated, data will be valid for a maximum of 12 months (CIEEM, 2019).

CONTENTS

1. EXECUTIVE SUMMARY

In May 2023 MKA Ecology Ltd was commissioned to undertake a nocturnal bat survey of 81 Belsize Park Gardens, Belsize Park, London, NW3 4NJ. A site visit was undertaken on 21 June 2023. The building at the Site was identified as having low bat roost suitability during a daytime bat inspection.

The Site comprises a four-storey building (B1) with a small area of hardstanding at the north end. The proposed development is for the refurbishment and internal remodelling of B1 to create new educational and performing arts facilities. The surrounding area comprises urban residential buildings and urban gardens.

The purpose of the survey was to identify bat roosts or bat roost suitability associated with the development ite, evaluate likely ecological impacts, assess requirements for further survey work, and describe likely mitigation and/or habitat enhancement requirements.

No bats were observed emerging from B1 during the survey work undertaken, and no bats were recorded within the surrounding area.

Pursuant to the requirements of the National Planning Policy Framework, bat box provisions have been recommended to provide enhanced features for roosting bats, as well as the creation of a sensitive lighting scheme and incorporation of native planting within the design scheme.

2. INTRODUCTION

2.1. Aims and scope of the report

In May 2023 MKA Ecology Ltd was commissioned to undertake a nocturnal bat survey at 81 Belsize Park Gardens, Belsize Park, London, NW3 4NJ by Fine Arts College Ltd, in order to support a planning application for refurbishment and internal remodelling of B1. The survey was commissioned following recommendations arising from a Preliminary Ecological Appraisal and Preliminary Roost Assessment completed in October 2022 (MKA Ecology Ltd, 2023).

The aims of the nocturnal bat survey were to:

- Undertake one dusk emergence survey at buildings at the site to confirm the presence/likely absence of roosting bats;
- Where roosting bats are present, identify the species involved, and, where possible, the population size, the type of roost and access points used;
- Assess the need for a European Protected Species Licence;
- Outline a suitable mitigation strategy for bats at the site, if required; and
- Propose any suitable habitat enhancements for bat species, if required.

This report must be read in conjunction with the Preliminary Ecological Appraisal and Preliminary Roost Assessment (MKA Ecology Ltd, 2023). With regards to bats, this report supersedes the findings and recommendations given in the previous report.

2.2. Site description and context

The survey area is shown on the map in Figure 1. Within this report this area is referred to as the Site or 81 Belsize Park Gardens. It is located at central grid reference TQ 27375 84637, in the London Borough of Camden. The Site comprises a four-storey building (B1, Figure 1) that was formerly a gym with a small area of hardstanding.

The landscape surrounding the Site is dominated by residential development, with buildings and roads to the north and east of the Site and residential gardens to the south. Despite the fact that the Site is dominated by urban habitats, the adjacent gardens form a green network with other gardens and pockets of green space in the wider area.

2.3. Proposed development

The current proposals involve the internal remodelling and refurbishment of the existing building (B1) and landscaping of outdoor areas.

2.4. Previous survey effort

B1 was assessed as having low potential to support roosting bats during the Preliminary Roost Assessment (MKA Ecology Ltd, 2023). Best Practice Guidelines (Collins, 2016) state that buildings with a low risk of supporting roosting bats should be subject to a single nocturnal survey to confirm presence or absence of roosts.

2.5. Legislation and planning policy

This nocturnal bat survey has been undertaken with reference to relevant wildlife legislation and planning policy.

Relevant legislation considered within the scope of this document comprised the following:

- The Conservation of Habitats and Species Regulations 2017 (as amended);
- The Wildlife and Countryside Act 1981 (as amended); and
- Natural Environment and Rural Communities (NERC) Act 2006.

Further information is provided in Appendix 1.

In addition to obligations under wildlife legislation, the revised National Planning Policy Framework (NPPF) updated in 2019 requires planning decisions to act towards conserving and enhancing the local environment. Further details are provided in Appendix 1.

Given that the Site is located within the coverage of the Greater London Authority (GLA), consideration of the London Plan 2021 has been given. The London Plan contains a number of policies relating to biodiversity:

- Policy G1 Green infrastructure;
- Policy G5 Urban greening;
- Policy G6 Biodiversity and access to nature;
- Policy G7 Trees and woodlands; and
- Policy G8 Food growing.

Camden Council has produced an adopted Local Plan which contains a single policy relating to biodiversity and habitat conservation (Policy A3). Camden Council have produced a Biodiversity Action Plan, which identifies regional priority habitats and species (Camden Council, 2017). There is also a Biodiversity Action Plan for Greater London (London Biodiversity Partnership, 2022).

Where relevant these are discussed in further detail in Section 5. Further details are provided in Appendix 1.

3. METHODOLOGY

3.1. Dusk emergence survey

B1 was assessed as having low potential to support roosting bats during the Preliminary Roost Assessment (MKA Ecology Ltd, 2023). Best Practice Guidelines (Collins, 2016) state that buildings with a low risk of supporting roosting bats should be subject to a single nocturnal survey.

Surveys were undertaken following guidance set out in *Bat Surveys for Professional Ecologists – Good Practice Guidelines (3rd edition)* (Collins, 2016), *Bat Workers' Manual (3rd edition)* (Mitchell-Jones and McLeish, 2004), and the *Bat Conservation Trust Interim Guidance Note: Use of night vision aids for bat emergence surveys and further comment on dawn surveys* (BCT, 2022). This document states that it is now permissible for ecologists to rely more heavily on night vision aids (NVAs) such as infrared cameras, instead of human surveyors, to observe potential roosting features during surveys. Furthermore, because NVAs were able to clearly capture bat activity from potential roosting features, the requirement for a dawn emergence survey as is usually required by the good practice guidelines (Collins, 2016) was negated.

Infrared cameras and lamps were positioned around B1 so that all potential roosting features fell within the field of view. Cameras were set to record from 15 minutes before sunset and continued for 2 hours after sunset. Bat detectors were set up around the building (Anabat Express) to record activity. Surveyors also used bat detectors (Echo Meter Touch 2) to record general activity around the Site. A map showing locations of cameras and bat detectors is shown in Figure 2. Screenshots taken from the footage of each camera from the darkest point of each of the surveys are provided in Appendix 5. These screenshots are provided as evidence that the infrared cameras were able to successfully capture clear images and that the potential roost features were visible throughout the survey.

Two ecologists were present on site to set up the recording equipment and monitor general bat activity levels. The ecologists recorded start and finish times of the survey, as well as weather conditions for each visit. A map of the Site was used by each surveyor to show general bat activity recorded during the survey.

3.2. Equipment and analysis

Infrared video recorders (Sony FDR AX53) were used to record bats emerging from the two potential roost features which were identified during the Preliminary Roost Assessment. Bat detectors were used to record general activity (Echo Meter Touch 2, Anabat Express).

Footage was reviewed following the survey on a desktop computer to identify emerging bats. Reviews were undertaken for 30-minute periods to avoid fatigue and lapses in concentration. Playback was at x1 speed to ensure that activity was not missed. Sound recordings were analysed using BatExplorer, Anabat Insight, and Kaleidoscope software. Identification of bat calls was undertaken using the parameters set out by Russ (2012).

3.3. Dates, times and weather conditions

The date, times and weather conditions are given for the survey visit, in Table 1, along with the buildings surveyed and the equipment used.

Table 1: Survey dates, times, weather conditions and equipment used

Date of survey visit	Start and end times, sunset/sunrise times	Building reference	Equipment used	Weather*
21.06.2023 (dusk emergence)	Start: 21.06 End: 21.21 Sunset: 23.21	Building B1	Bat detectors: Echo Meter Touch 2 AnaBat Express Infrared video recorder: Sony FDR AX53 with Nightfox infrared torches	Start temp: 22 ^{O}C End temp: 20 ^{O}C Precipitation: None Wind: 3 SW Cloud cover: 2/8
Comments: Two surveyors, two cameras, two bat detectors				

*Wind as per Beaufort Scale / Cloud cover given in Oktas.

3.4. Surveyors

The nocturnal bat surveys and analysis of video and audio data were undertaken by the following ecologists:

- Alisa Davies, Graduate Ecologist at MKA Ecology Ltd. Alisa has one season of experience in undertaking nocturnal bat surveys.
- Olivia Hine, Graduate Ecologist at MKA Ecology Ltd. Olivia has one season of experience in undertaking nocturnal bat surveys.

The report was written by Alisa Davies. It was reviewed by Lydia Ennis ACIEEM, Senior Ecologist at MKA Ecology Ltd. Lydia has five seasons' experience undertaking nocturnal bat surveys.

3.5. Constraints

The results taken from bat detector recordings are biased towards bats that use louder echolocation calls. Therefore, quiet bats, such as brown long-eared bat, may be under-recorded due to the limited recording range of the equipment. This was not considered to present a significant constraint as surveyors were vigilant to ensure that visual cues indicating the presence of quiet species were recorded.

In some circumstances it is not possible to confirm bat species with absolute confidence using sound analysis techniques. In particular some calls of common pipistrelle and soprano pipistrelle overlap making species identification difficult. In these circumstances the bat can be identified as a *Pipistrellus* sp. only. Within this report where *Pipistrellus* sp. is used this refers only to common pipistrelle and soprano pipistrelle. This should not be interpreted as other species of the *Pipistrellus* genus, such as Nathusius' pipistrelle *Pipistrellus nathusii* which, although it occurs relatively frequently within the UK is not commonly recorded. Where Pipistrelle species other than common or soprano pipistrelle are suspected this will be directly referenced and discussed within the report. Similarly calls of *Myotis* species can demonstrate a large number of overlapping parameters making identification difficult. Where this is the case, a bat has been identified as *Myotis* sp.

Potential roost feature 1 (Figure 1) was a gap into an internal void at the joining of two external walls. Due to the position and access limited beyond the roof of the building, it was not possible to place camera IR1 so that it had a direct field of view of the feature. To mitigate this, the camera was placed with a field of view covering the area directly outside and below the feature so that an emerging bat would be captured flying through the space. A surveyor was also positioned at another angle with a direct view of the feature (Figure 1) and monitored the feature for the whole duration of the survey, Therefore, it is unlikely that an emergence would have been missed.

3.6. Assessment

The guidelines for categorisation of bats in England by distribution and rarity (adapted from Wray *et al*., 2010) are shown in the tables below.

Table 2: Rarity of bat species within England

Rarity within range (England)	Species
Rarest (population under 10,000)	Greater horseshoe bat *Rhinolophus ferrumequinum* Bechstein's bat *Myotis bechsteinii* Alcathoe's bat *Myotis alcathoe* Greater mouse-eared bat *Myotis myotis* Barbastelle *Barbastella barbastellus* Grey long-eared bat *Plecotus austriacus*
Rarer (population 10,000 to 100,000)	Lesser horseshoe bat *Rhinolophus hipposideros* Whiskered bat *Myotis mystacinus* Brandt's bat *Myotis brandtii* Daubenton's bat *Myotis daubentonii* Natterer's bat *Myotis nattereri* Leisler's bat *Nyctalus leisleri* Noctule *Nyctalus noctula* Serotine *Eptesicus serotinus* Nathusius' pipistrelle *Pipistrellus nathusii*
Common (population over 100,000)	Common pipistrelle *Pipistrellus pipistrellus* Soprano pipistrelle *Pipistrellus pygmaeus* Brown long-eared bat *Plecotus auritus*

Table 3: Level of importance of roost type

Geographic frame of reference	Roost type
District, Local or Parish	Feeding perches (common species) Individual bats (common species) Small numbers of non-breeding bats (common species) Mating sites (common species)
County	Maternity sites (common species) Small numbers of hibernating bats (common and rarer species) Feeding perches (rarer/rarest species) Individual bats (rarer/rarest species) Small numbers of non-breeding bats (rarer/rarest species)
Regional	Mating sites (rarer/rarest species) including well-used swarming sites Maternity sites (rarer species) Hibernation sites (rarest species) Significant hibernation sites for rarer/rarest species or all species assemblages
National/UK	Maternity sites (rarest species) Sites meeting SSSI guidelines*
International	SAC sites

*Sites meeting SSSI (Sites of Special Scientific Interest) selection guidelines include Barbastelle maternity roosts and mixed species hibernacula assemblages

4. RESULTS

4.1. Results summary

No bats were observed emerging from B1 during the survey. Raw survey data are provided in Appendix 3.

4.2. Dusk emergence survey 1

The dusk emergence survey was completed on 21 June 2023. Sunset was at 21:21. No bats were detected during the survey and no bats were recorded on the infrared camera footage.

5. EVALUATION AND MITIGATION PROPOSALS

The following evaluation is based on the combined information from the Preliminary Roost Assessment on 25 April 2023 and the dusk emergence survey undertaken on 21 June 2023.

5.1. Evaluation

No bat activity or evidence of roosting bats was recorded at the Site during the survey. Despite this, incorporating habitat enhancements into the design scheme would provide opportunities to benefit the local bat population, making the Site more suitable for roosting and foraging bats in the future. This can be done through the provision of bat boxes to provide increased roosting opportunities within the Site post development.

5.2. Ecological impacts in absence of mitigation

The current proposals involve the internal remodelling and refurbishment of the existing building (B1) and landscaping of outdoor areas. Since no bat roosts were identified, there are no anticipated impacts of the proposed development.

6. RECOMMENDATIONS

The following recommendations are based on the combined information from the Preliminary Roost Assessment on 25 April 2023 and the dusk emergence survey undertaken on 21 June 2023.

The proposed development at 81 Belsize Park Gardens, London will likely involve construction work affecting the building internals, roof, boundary walls and surrounding hardstanding.

Following the issue of the National Planning Policy Framework (NPPF, see Appendix 1), all planning decisions should aim to maintain, and enhance, restore or add to biodiversity conservation interests. To provide improved provisions for roosting bats on site, it is recommended that bat boxes are included within the design scheme. A minimum of two bat boxes should be mounted on the south or west facing aspects of the building. No roosting provisions or potential access points should be directly lit. Examples of suitable bat boxes are provided in Appendix 4.

Recommendation 1
A minimum of two bat boxes should be mounted on south or west facing aspects of the building B1.

Artificial lighting is known to have detrimental impacts on bat roosting behaviour, commuting and foraging activity (BCT, 2018). It is strongly recommended that any proposed exterior lighting across the Site is designed and managed to ensure the area provides suitable habitat for foraging bats. A sensitive lighting scheme should be developed as part of the design scheme. Advice on lighting can be found in the Bat Conservation Trust Guidance Note 8 (BCT, 2018). In addition to the use of downward facing lighting and fitting lights with cowls, lights should also be fitted with short timers.

Recommendation 2
A sensitive lighting scheme should be developed to allow for suitable roosting and foraging areas for bats within the Site. No retained or newly planted trees or new roosting features should be directly lit.

Existing vegetation should be enhanced with native planting to create higher quality foraging habitat for bats. It is recommended that native planting is incorporated into the design scheme, to provide foraging and commuting habitat for bats in the area. This should include native tree and shrub species.

Recommendation 3
Native planting should be incorporated into the design scheme, including additional planting of native trees and shrubs.

Summary of recommendations

Table 4 below summarises the requirement for further work at the Site in relation to bats and the stage of development at which the work should be undertaken.

Table 4: Summary of further work required at 81 Belsize Park Gardens, London

Species	Pre-planning action required?	Pre-construction action required?	Construction phase mitigation required?	Enhancements proposed?
Bats	None	Design a sensitive lighting scheme	Sensitive lighting scheme during construction	Install bat boxes and habitat enhancements

7. CONCLUSIONS

Building B1, which is due to be remodelled and refurbished under the current proposals, does not currently support bat roosts. Indeed, no bats were observed or recorded in the area during the survey work undertaken.

In order to provide biodiversity enhancements in line with local and national planning policy, it is recommended that the provision of bat boxes and the incorporation of native planting within the Site are included within the proposals. The creation of a sensitive lighting scheme would also enhance the Site for bats and ensure any enhancement measures provided are suitable for use by bats.

8. REFERENCES

Bat Conservation Trust (2018) *Bats and artificial lighting in the UK*. Built Environment Series, Guidance Note **8.**

Bat Conservation Trust (2022) *Interim Guidance Note*. Available at: https://cdn.bats.org.uk/uploads/pdf/Interim-guidance-note-on-NVAs-May-2022 FINAL.pdf?v=1653399882

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Russ, J. (2012) *British Bat Calls – A Guide to Species Identification*. Pelagic Publishing: Exeter.

Wray, S., Wells, D., Long, E. and Mitchell-Jones, T. (2010) Valuing bats in Ecological Impact Assessment. *In Practice*, 70: 23 – 25.

9. APPENDICES

9.1. Appendix 1: Relevant legislation and planning policy

Please note that the following is not an exhaustive list and is solely intended to cover the most relevant legislation pertaining to species commonly associated with development sites.

Subject	Legislation (England)	Relevant criminal offences
Bats (all species)	The Conservation of Habitats and Species Regulations 2017 (as amended) All bat species are listed on Schedule 2, which designates them as European Protected Species. European Protected Species are subject to the provisions of Part 3, Regulation 41 (Protection of certain wild animals).	• Deliberate capture, injury or killing of a bat; • Deliberate disturbance of a bat; • Damage or destruction of a bat roost; • To possess, control, transport, sell or exchange, or to offer for sale or exchange, any live or dead bat or part of a bat, or anything derived from a bat or any part of a bat. **Notes** In this interpretation, a bat roost is "*a breeding site or resting place of a bat*". Because bats tend to reuse the same roosts, bat roosts are considered to be protected whether or not the bats are present at the time. In this interpretation, disturbance of animals includes *in particular* any disturbance which is likely – (a) to impair their ability: • to survive, to breed or reproduce, or to rear or nurture their young, or

		• in the case of animals of a hibernating or migratory species, to hibernate or migrate; or • (b) to affect significantly the local distribution or abundance of the species to which they belong.
	Wildlife and Countryside Act 1981 (as amended) All bat species are listed on Schedule 5 and are therefore subject to parts of the provisions of Section 9 (Sections 9(4)(b) and (c) and Section 9(5)).	• Intentional or reckless disturbance of a bat while it is occupying a roost; • Intentional or reckless obstruction of access to a roost; • To sell, expose for sale, possess or transport for the purpose of sale, any live or dead bat or any part of, or anything derived from a bat; or • Publishing or causing to be published any advertisement likely to be understood as conveying that an individual buys or sells, or has an intention to buy or sell bats. In this interpretation, a bat roost is "*any structure or place which any wild [bat]...uses for shelter or protection*". Because bats tend to reuse the same roosts, bat roosts are considered to be protected whether or not the bats are present at the time.

The Wildlife & Countryside Act 1981 (as amended)

Full legislation text available at: http://www.legislation.gov.uk/ukpga/1981/69

Conservation of Habitats and Species Regulations 2017 (as amended)

Full legislation text available at: https://www.legislation.gov.uk/uksi/2017/1012/contents/made

Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006

Full legislation text available at: http://www.legislation.gov.uk/ukpga/2006/16/contents

Several bat species are listed as species of principal importance for the purpose of conserving biodiversity under Section 41 of the NERC Act 2006.

The NERC Act 2006 places a legal obligation on public bodies, including those considering planning applications, to maintain, and where possible enhance, the conservation status of any Section 41 species found on a site. Species included on Section 41 were also included on the UK Biodiversity Action Plan (BAP) and remain an integral part of the Post-2010 Biodiversity Framework.

These species are:

- Barbastelle *Barbastella barbastellus*;
- Bechstein's bat *Myotis bechsteinii*;
- Brown long-eared bat *Plecotus auritus*;
- Greater horseshoe bat *Rhinolophus ferrumequinum*;
- Lesser horseshoe bat *Rhinolophus hipposideros*;
- Noctule *Nyctalus noctula*; and
- Soprano pipistrelle *Pipistrellus pygmaeus*.

National Planning Policy Framework (NPPF)

Full text is available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2

The revised NPPF was updated on 20 July 2021 setting out the Government's planning policies for England and the process by which these should be applied. The policies within the NPPF are a material consideration in the planning process. The key principle of the NPPF is a presumption in favour of sustainable development, with sustainable development defined as a balance between economic, social and environmental needs.

Policies 170 to 183 of the NPPF address conserving and enhancing the natural environment, stating that the planning system should:

- Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes;
- Recognise the wider benefits of ecosystem services; and

- Minimise impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity.

Furthermore, there is a focus on re-use of existing brownfield sites or sites of low environmental value as a priority, and discouraging development in National Parks, Sites of Specific Scientific Interest, the Broads or Areas of Outstanding Natural Beauty other than in exceptional circumstances.

Where possible, planning policies should also

"*Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*".

Local Planning Policy

Given that the Site is located within London, consideration of the policies relating to biodiversity within the London Plan 2021 has also been given. These include policies G1 and G5 to G8, as detailed below:

- Policy G1 Green infrastructure
  - *a) London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.*
  - *b) Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way.*
  - *c) Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:*
    1. *identify key green infrastructure assets, their function and their potential function*
    2. *identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.*
  - *d) Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network*.
- Policy G5 Urban greening
  - *a) Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.*
  - *b) Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in within the London Plan, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are*

predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

c) *Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in the London Plan*

- Policy G6 Biodiversity and access to nature

a) *Sites of Importance for Nature Conservation (SINCs) should be protected.*

b) *Boroughs, in developing Development Plans, should:*

1. *use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks*
2. *identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them*
3. *support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans*
4. *seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context*
5. *ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.*

c) *Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:*

1. *avoid damaging the significant ecological features of the site*
2. *minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site*
3. *deliver off-site compensation of better biodiversity value.*

d) *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.*

e) *Proposals which reduce deficiencies in access to nature should be considered positively.*

- Policy G7 Trees and woodlands

a) *London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.*

b) *In their Development Plans, boroughs should:*

1. *protect 'veteran' trees and ancient woodland where these are not already part of a protected site*
2. *identify opportunities for tree planting in strategic locations.*

c) *Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.*

- Policy G8 Food growing

a) *In Development Plans, boroughs should:*

1. *protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites*
2. *identify potential sites that could be used for food production.*

Camden Council has produced an adopted Local Plan, which contains one policy specifically relating to biodiversity and habitat conservation:

- Policy A3 – Biodiversity

The Council will protect and enhance sites of nature conservation and biodiversity. We will:

a) *designate and protect nature conservation sites and safeguard protected and priority habitats and species;*
b) *grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species;*
c) *seek the protection of other features with nature conservation value, including gardens, wherever possible;*
d) *assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed;*
e) *secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;*
f) *seek to improve opportunities to experience nature, in particular where such opportunities are lacking;*
g) *require the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species;*

h) secure management plans, where appropriate, to ensure that nature conservation objectives are met; and

i) work with The Royal Parks, The City of London Corporation, the London Wildlife Trust, friends of park groups and local nature conservation groups to protect and improve open spaces and nature conservation in Camden.

Trees and vegetation

The Council will protect, and seek to secure additional, trees and vegetation. We will:

j) resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation;

k) require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction' and positively integrated as part of the site layout;

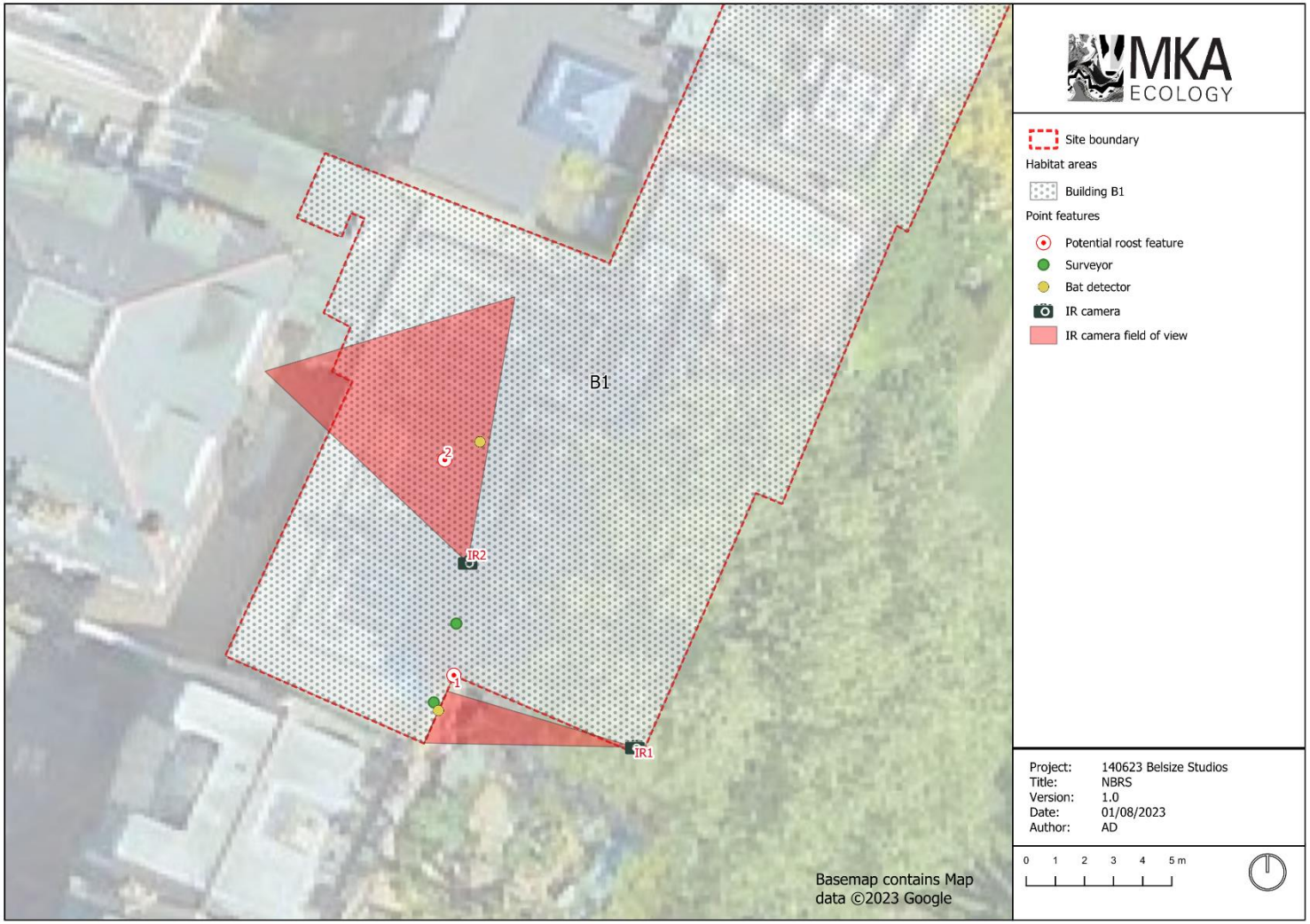
l) expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development;

m) expect developments to incorporate additional trees and vegetation wherever possible.

9.2. Appendix 2: Figures

Figure 1: Site location plan and preliminary ecological appraisal map

Figure 2: Surveyor Location Plan



9.3. Appendix 3: Raw survey data

Time	Location	Common Name	Passes	Comments
Survey 1: 21.06.23				
No activity was recorded during the survey work undertaken.				

9.4. Appendix 4: Bat box recommendations

A wide range of bat boxes are available to suit a variety of species and design requirements. Bat boxes can be mounted externally on buildings, built directly into the wall structure or mounted on trees (dependent on box design).

Boxes are more likely to be inhabited if they are located where bats feed and it may help to place the box close to features such as tree lines or hedgerows, which bats are known to use for navigation and can provide immediate cover for bats leaving the roost. Boxes should be placed in areas sheltered from strong winds and are exposed to the sun for part of the day. Access to any bat roosting features should not be lit and should also be at a reasonable height to avoid predation (at least 2m if possible, preferably 4-5m).

Example	Description	Picture
Schwegler 1FQ	www.schwegler-nature.com Dimensions: 60(h) x 35(w) x 9(d) cm Weight: 15.8kg Installation: Attached to most external brick, timber or concrete walls at least 3m high. Can also be placed inside roof space This box is ideal for all types of bats that inhabit buildings. The box is weather-resistant and is also temperature controlled and self-cleaning. The front panel of the box can also be painted during manufacture, to match an existing colour.	
Schwegler 1WI	www.schwegler-nature.com Dimensions: 55(h) x 35(w) x 9.5(d) cm Weight: 15kg Installation: Attached to most types of external brick, timber or concrete walls. It can be installed flush-mounted and rendered over or simply against the wall. It should be installed at a height of at least 3m. This box typically attracts building-inhabiting bat species like pipistrelles or serotine bat.	

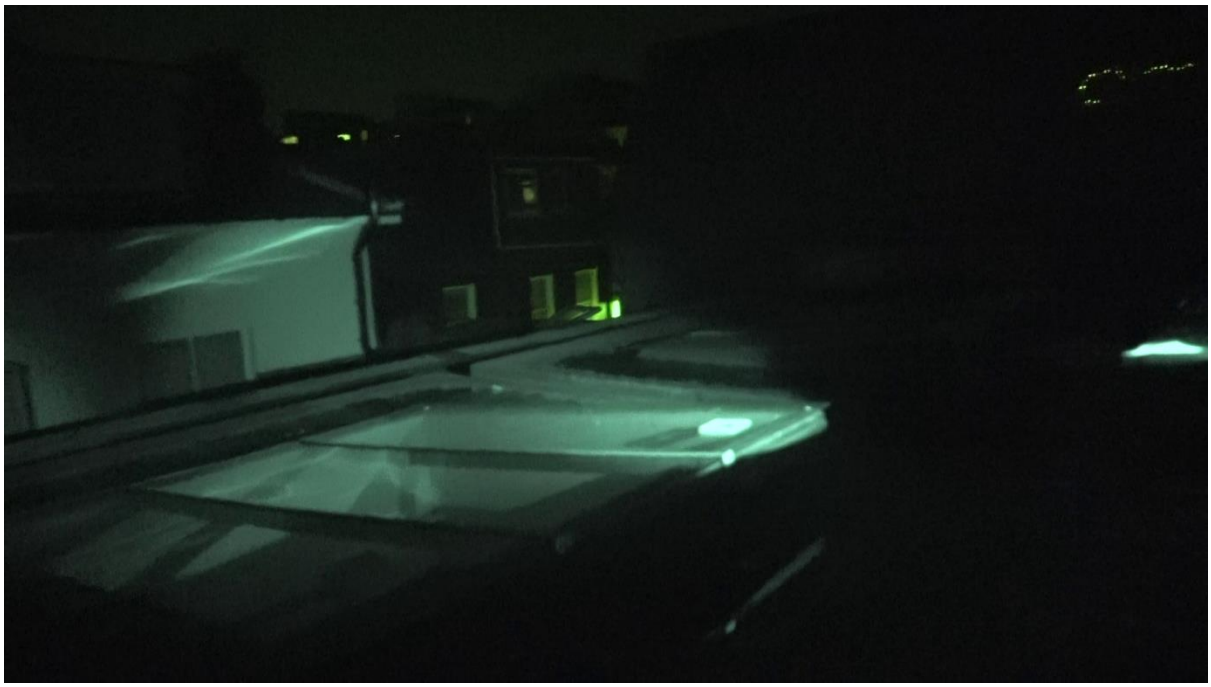
Example	Description	Picture
	This box is weather-resistant and designed for both winter hibernation and larger colonies in summer, including nursery roosts.	
Schwegler 1MF (Swift and Bat)	www.schwegler-nature.com Dimensions: 46(h) x 43(w) x 22.5(d) cm. Weight: approx. 24 kg Installation: The box can be hung against any types of wall of any type of building, between 6-7m above ground level. This box is designed for nesting swifts, however the recess in the rear panel creates a space between the wall of the building and the box, making it ideal for bats that inhabit building, such as common pipistrelle. Whilst the box may require cleaning, the back recess for bats requires no maintenance.	

9.5. Appendix 5: Screenshots from darkest points of survey

The screenshots provided below are taken from the darkest points of each of the nocturnal bat surveys conducted at 81 Belsize Park Gardens, London.

IR1- Figure 1

IR2 - Figure 1



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