

# **Preliminary Ecological Appraisal**

Rare Dementia Support Centre

University College London

Project number: 60714846

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# Quality information

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# **Executive Summary**

Site Details	The Site comprised two terraced brick buildings and back gardens at 25/26 Woburn Square on the campus of University College London in the London Borough of Camden.		
Proposed Development	It is proposed to refurbish the two Georgian buildings to be used as the Rare Dementia Support Centre (RDSC). A new well-being garden will be established.		
Ecological Features that may be affected by the Scheme	Lee Valley Special Protection Area and Ramsar is located 7.5 km to the north, Camley Street Local Nature Reserve is located 1.5 km north as well as two local Sites of Importance for Nature Conservation (SINC), namely Gordon Square (0.13km north) and Russell Square (0.18km south). The existing trees and vegetation on the Site have suitability for bat flight lines and foraging, as well as nesting birds. The existing gardens have suitability for notable invertebrates such as the small copper butterfly. Two semi-mature trees and 75 square metres of ruderal vegetation will be lost to facilitate the Proposed Development.		
Recommendations for further survey and assessment	No further surveys are recommended . A small sites Biodiversity Net Gain assessment is recommended to confirm the change in biodiversity units for the Site, as two trees and vegetation will be lost and replaced with a new well-being garden.		
Recommendations for Avoidance / Mitigation	<ul> <li>A Construction and Environmental Management Plan or equivalent should detail methods to avoid and or reduce indirect impacts to the nearby designated sites.</li> <li>A stick nest suitable for use by birds was identified during the survey within a tree due to be lost to the Proposed Development. As some bird species can nest all year, and due to the presence of the existing nest, it is recommended that an ecologist conducts a pre-works nesting bird check, immediately prior (no more than 48hrs) to removal of the tree. In the event the nest is found to be active, works within a buffer zone (to be determined by the ecologist, generally 5m but species-dependent) must cease until the ecologist has confirmed chicks have fledged. The ecologist will also deliver a toolbox talk with regards to the potential for nesting birds within the Site.</li> <li>Works would be stopped and ecological advice sought in the event that a roosting bat is found.</li> <li>The lighting scheme should be sensitive to bats, both during construction and in the final lighting design.</li> <li>Biosecurity measures should be in place to prevent the spread of invasive nonnative species onto as well as off the Site during construction.</li> </ul>		
Opportunities for Biodiversity Enhancements	<ul> <li>The biodiversity enhancement should be integrated into the use of the garden for people with dementia. For example, if house sparrows are encouraged, they would have an auditory as well as visual impact, helping to contribute towards a calm and relaxing environment. There is an opportunity to relocate the National Brain Appeal's "Rare Space" Garden as shown at 2023 RHS Chelsea Flower Show. The following enhancements could be incorporated into the garden without impacting its visual appeal whilst increasing its biodiversity value:</li> <li>moss roofs on the two flat roofs;</li> <li>well-being garden and window boxes with wildflower friendly planting;</li> <li>house sparrow terraces on the buildings facing the garden;</li> <li>bird feeder and bird bath discreetly located within the well-being garden;</li> <li>pollinator boxes on poles or fixed to the back wall;</li> <li>log piles tucked away in corner of the garden; and</li> <li>green wall (climbers on trellis or hedge).</li> </ul>		

# 1. Introduction

### 1.1 Background

This Preliminary Ecological Appraisal report (PEAR) has been prepared by AECOM on behalf of University College London (UCL) (the Client), to assess the ecological constraints in connection with the refurbishment of 25/26 Woburn Square for use as the Rare Dementia Support Centre (RDSC) (hereafter referred to as the Proposed Development). The Proposed Development is located at 25/26 Woburn Square in the London Borough of Camden (Central Grid Reference: TQ 29843 82109), as shown by the red line boundary on the Phase 1 Habitat Map in Appendix A. All land situated within this red line is hereafter referred to as the Site.

The assessment of ecological constraints has been undertaken with reference to current good practice<sup>1</sup> and forms part of the technical information commissioned by University College London in connection with the Proposed Development. The PEAR addresses relevant wildlife legislation and planning policy as summarised in Appendix B and is consistent with the requirements of *British Standard 42020:2013 Biodiversity. Code of Practice for Planning and Development.* 

This PEAR is intended for advice in respect of Scheme design, site layout and / or site investigation. Further ecological surveys and / or ecological impact assessment (including detailed mitigation measures) may be required in connection with a planning application.

# 1.2 The Site, Location and Setting

The Site is located at, 25/26 Woburn Square in the London Borough of Camden, at Ordnance Survey national grid reference TQ 29843 82109 and is approximately 167 m<sup>2</sup> in size. The approximate site location is shown in Figure 1.

The Site comprises two terraced four-storey Georgian buildings, previously used as educational facilities, with back gardens.

The Site is directly surrounded by educational and student accommodation properties found in the UCL campus and close to two pocket park spaces, Woburn Square which is adjacent to the east of Site and Russell Square which is approximately 200m south.

### 1.3 The Proposed Development

It is proposed to refurbish the two Georgian buildings to be used as the Rare Dementia Support Centre (RDSC). A new well-being garden will be established.

# **1.4** Purpose of the Preliminary Ecological Appraisal

This PEAR presents ecological information obtained from:

- a desk-study undertaken on 30 May 2024 to obtain records of designated sites, notable habitats<sup>2</sup> and protected and notable species<sup>3</sup> within 1km of the Site (the area covered by the desk study is hereafter referred to as the Study Area); and
- a walkover survey of accessible land within and adjacent to the Site (the area covered by the survey is hereafter referred to as the Survey Area) on 29 April 2024.

<sup>&</sup>lt;sup>1</sup>CIEEM (2017). *Guidelines for Preliminary Ecological Appraisal, 2nd edition.* Chartered Institute of Ecology and Environmental Management, Winchester.

<sup>&</sup>lt;sup>2</sup>Notable habitats are taken as principal habitats for the conservation of biodiversity listed under Section 41 of the *Natural Environment and Rural Communities Act 2006*; habitats listed under the Westminster Open Spaces and Biodiversity Strategy Action Plan; hedgerows identified as being 'important' under the wildlife criteria of the *Hedgerow Regulations 1997*, ancient woodlands and veteran trees.

<sup>&</sup>lt;sup>3</sup>Notable species are taken as principal species for the conservation of biodiversity listed under Section 41 of the *Natural Environment and Rural Communities Act 2006*; any species listed in an IUCN Red Data Book; and any other species listed under the Westminster Open Spaces and Biodiversity Strategy Action Plan.

The purpose of the PEAR is to provide a high-level ecological appraisal of the Site, specifically to:

- establish baseline conditions and determine the presence of Important Ecological Features (IEF)<sup>4</sup> (or those that could be present), as far as is possible;
- identify potential ecological constraints to the Scheme and make initial recommendations to avoid impacts on IEFs, where possible;
- identify requirements for mitigation, where possible, including mitigation measures that will be required and those that may be required (depending on results of further surveys or final scheme design);
- establish any requirements for more detailed surveys; and,
- identify any opportunities offered by the Scheme to deliver biodiversity enhancements.

The method followed for undertaking the desk study and field surveys is detailed in Appendix C, including any limitations to the assessment.

<sup>&</sup>lt;sup>4</sup> Important Ecological Features are habitats, species, ecosystems and their functions and processes that are of conservation importance and could potentially be affected by the Scheme.

# 2. Ecological Baseline, Constraints and Recommendations

The following sections detail the results of the desk and field-based studies undertaken to inform this PEAR. Where necessary, recommendations for mitigation measures to protect known IEFs, or further surveys to determine the presence or likely absence of likely IEFs are provided.

With regard to background data, 'recent' records are considered to be those no older than 10 years from the date of the desk study. Records outside of this period are historical and have only been reported where more recent records for a feature do not exist. Exceptions to this are detailed in the appropriate sections below.

# 2.1 Sites Designated for their Biodiversity Value

#### 2.1.1 Desk Study

There is one site with an international designation for its biodiversity significance within 10km of the Site and one site with a statutory designation for its biodiversity within 2km of the Site.

There are seven non-statutory-designated sites within 1km of the Site.

Table 1 summarises the designated sites situated within the Study Area.

#### Table 1. International, Statutory and Non-Statutory Designated Sites for Nature Conservation

Designated Site Reason for Designation		Location of Designated Site <sup>5</sup>
	Internationally Designated Sites	
Lee Valley Special Protection Area and Ramsar (451.3ha) A series of embanked water supply reservoirs, sewage treatment lagoons, and former gravel pits extending along about 24km of the valley from near Ware southward to Finsbury Park in London. These water bodies support internationally important numbers of wintering gadwall ( <i>Mareca strepera</i> ) and shoveler ( <i>Anas clypeata</i> ) and nationally important numbers of several other bird species. The site also contains a range of wetland and valley bottom habitats, both humanmade and semi-natural, which support a diverse array of wetland fauna and flora.		7.5km north east of the Site
	National Statutory Designated Sites within 2km	
Camley Street Nature Park (Local Nature Reserve)	The site was once a coal drop for the railways into nearby King's Cross Railway Station, which became colonised by nature and opened as Camley Street Natural Park in 1985. The site comprises woodland, grassland and wetland habitats including ponds, reedbed and marshy areas, supporting birds, butterflies, amphibians and plant life. Floating reedbeds have also been added to the water's edge along this area of the Regent's Canal, providing nesting bird habitat as well as providing for invertebrates and fish. The reedbeds also absorb excess nutrients from the water, mitigating canal pollution.	1.5km north of the Site
	Non-Statutory Designated Sites within 1km	
	Local	
Gordon Square Site of Importance for Nature Conservation (SINC) (0.92ha)	This is a small but very well used and typically urban, London square with numerous London plane ( <i>Platanus x</i> <i>hispanica</i> ) trees as well as common lime ( <i>Tilia x europaea</i> ), beech ( <i>Fagus sylvatica</i> ), hornbeam ( <i>Carpinus betulus</i> ), flowering cherry (a species of <i>Prunus</i> ) and purple cherry- plum ( <i>Prunus cerasifera</i> var. <i>Pissardii</i> ). The square's edges have dense shrubberies, of mostly non- native species such as snowberry ( <i>Symphoricarpos</i> <i>rivularis</i> ), lilac ( <i>Syringa vulgaris</i> ), mock orange (a species of <i>Philadelphus</i> ), spotted laurel ( <i>Aucuba japonica</i> ), butterfly- bush ( <i>Buddleja davidii</i> ), dogwood ( <i>Cornus sanguinea</i> ) and a little hazel ( <i>Corylus avellana</i> ). Wild flowers planted in the	0.13km north of the Site

<sup>5</sup>Where designated sites are situated outside of the Site boundary, the distance and direction are given at the closest point of the designated site from the Site

Designated Site	Reason for Designation	Location of Designated Site <sup>5</sup>	
	flower beds include primrose ( <i>Primula vulgaris</i> ) and bluebell ( <i>Hyacinthoides non-scripta</i> ).		
Russell Square Local SINC (2.49 ha) This square is one of the largest in central London and contains many mature trees. These are mostly London planes, situated chiefly at the perimeter and at its centre. Other trees include common lime, beech, oak ( <i>Quercus</i> spp), false acacia ( <i>Robinia pseudoacacia</i> ), tree-of-heaven ( <i>Ailanthus altissima</i> ), hawthorn ( <i>Crataegus monogyna</i> ) and holly ( <i>Ilex aquifolium</i> ). A hornbeam hedge has recently been planted at the site's boundary, and there are a number of shrubberies.		0.18km south of the Site	
Coram's Fields Local SINC (2.7 ha)	There are numerous mature London plane trees, mostly at the perimeter, and a hedge of beech. At the western edge of the site, white mulberry ( <i>Morus alba</i> ) and black mulberry ( <i>M.</i> <i>nigra</i> ) have been planted, while ground flora is dominated by species characteristic of acid grassland, such as red and sheep fescue ( <i>Festuca rubra and F. ovina</i> ), parsley-piert ( <i>Aphanes arvensis</i> ), along field madder ( <i>Sherardia arvensis</i> ) and a variety of ruderal plants. This area is currently grazed by goats and includes several raised beds and fruit trees. To the east an area is being developed as a wildlife garden with a small pond supporting frogs and newts.	0.5km east of the Site	
St George's Gardens Local       This is an old churchyard site that is now managed as a public park. It contains many mature trees, particularly London plane, weeping ash ( <i>Fraxinus excelsior var. pendula</i> ) and common lime. There are areas of shrubbery which contain insect-attracting plants such as butterfly-bush, rose ( <i>Rosa</i> sp.) and lavender ( <i>Lavandula</i> sp.), as well as providing nesting cover for blackbirds ( <i>Turdus merula</i> ) and wrens ( <i>Troglodytes troglodytes</i> ).		0.55km east of the Site	
St Andrews Gardens Local SINC (0.66ha)	This former churchyard is now managed as a small public park. Only the larger monuments have been left in place; headstones have been moved to the perimeter. Lawns, flower beds and shrubberies combine to make this a particularly attractive site. Mature common lime, beech, and London plane trees line the paths and boundaries. Extensive shrubberies include many insect-attracting species such as buddleia, lilac ( <i>Syringa vulgaris</i> ), hazel and rose. The lawns contain a number of wild flowers, including lesser celandine ( <i>Ranunculus ficaria</i> ) and yarrow ( <i>Achillea millefolium</i> ). A wildlife area along the east boundary of the site supports a wide variety of herbaceous plants such as common knapweed ( <i>Centaurea nigra</i> ), ox-eye daisy ( <i>Leucanthemum vulgare</i> ) and black horehound ( <i>Ballota nigra</i> ).	0.75km east of the Site	
Calthorpe Community Garden Local SINC (0.44ha) This garden is located in a very built up area of London just off the Grays Inn Road. The site contains a number of scattered trees, including young beech, ash ( <i>Fraxinus</i> <i>excelsior</i> ), hawthorn, flowering cherry ( <i>Prunus</i> sp.) and oak ( <i>Quercus robur</i> ). There is an artificial stream planted with yellow iris ( <i>Iris pseudacorus</i> ), pendulous sedge ( <i>Carex</i> <i>pendula</i> ) and hard rush ( <i>Juncus inflexus</i> ). The rockery gardens are planted with a number of insect-attracting species, such as rosemary ( <i>Rosmarinus officinalis</i> ), Canadian goldenrod ( <i>Solidago canadensis</i> ), foxglove ( <i>Digitalis purpurea</i> ), Michaelmas daisy ( <i>Aster</i> sp.), ivy ( <i>Hedera helix</i> ) and oxeye daisy. A beech hedge runs through the site. A small pond located in the wildlife area with restricted access, with marginal vegetation such as water mint ( <i>Mentha aquatica</i> ), pendulous sedge and yellow flag supports frogs. Next to the pond is a mosaic of scrub and grassland with scattered silver birches ( <i>Betula pendula</i> ) and rowans ( <i>Sorbus aucuparia</i> ) with abundance of deadwood, providing habitat for birds and invertebrate species.		0.75km east of the Site	
Phoenix Garden Local SINC (0.12ha)	This garden is located in the heart of London just off Shaftsbury Avenue. There is an open meadow area and rockery, pond and children's play area. There are dense shrubberies with young trees planted within. These include rowan, willow ( <i>Salix</i> sp.), birch ( <i>Betula</i> sp.), maidenhair tree	1km south of the Site	

Designated Site	Reason for Designation	Location of Designated Site <sup>5</sup>
	( <i>Gingko biloba</i> ) and walnut ( <i>Juglans regia</i> ). Many native wild flowers have been planted, including bluebell, red campion ( <i>Silene dioica</i> ), hedge woundwort ( <i>Stachys sylvatica</i> ), black horehound, ox-eye daisy, cow parsley ( <i>Anthriscus</i> <i>sylvestris</i> ) and wood avens ( <i>Geum urbanum</i> ). The pond has diverse vegetation around its edges, including water mint, great reedmace ( <i>Typha latifolia</i> ), yellow iris and soft and hard rushes.	

#### 2.1.2 Constraints and Recommendations

The nearest statutory designated site, Camley Street Nature Reserve, is located 1.5 km north of the Site. The nearest internationally designated site, Lee Valley Special Protection Area and Ramsar, is located 7.5 km north of the Site There is unlikely to be a significant impact on these sites as a result of the Proposed Development due to the buffer of built-up urban landscape between the Site and the designated Sites. The site is unlikely to be hydrologically connected to the internationally designated site due to distance.

The nearest non-statutory designated sites are Gordon Square local SINC 0.13km north and Russell Square local SINC 0.18km south. It is unlikely there will be direct impacts on these designated sited as a result of the Proposed Development due to the distance between the sites and the restriction of the refurbishment works to within the red-line boundary. Indirect impacts to the designated sites could be avoided and or reduced by following standard practices to control dust, noise vibration and light spill during works and confirming these measures in a Construction and Environmental Management Plan, or equivalent. If these measures are followed, there will be no impact on designated sites.

The draft landscape plan shows that the post-development habitats will create opportunities for wildlife and will connect ecologically to SINCs and other green spaces in the Study Area.

### 2.2 Habitats

#### 2.2.1 Desk Study

#### 2.2.1.1 Priority Woodland

There are three areas of priority woodland habitat (deciduous) within 500m of the Study Area. These are located in Russell Square (0.18km south), Bedford Square (0.4km south) and Tavistock Square (0.1km north). These are Habitats of Principal Importance (HoPI), listed on Section 41 of the Natural Environment and Rural Communities Act (2006) as amended. No blocks of woodland listed as ancient woodland or on the National Forest Inventory 2014 were within the Study Area.

#### 2.2.2 Field Survey

There were three habitats found within the Site, as outlined in Table 2. Photographs and target notes are shown in Appendix D.

The Site consists of two buildings and related hardstanding with gardens, with no notable habitats within the Site boundary.

Habitat	Brief Description	Area or length	
Jrban – Developed land, sealed surface Two terraced buildings - Numbers 25 and 26 Woburn Square, with light wells at the back of the building.		196 m²	
Sparsely vegetated land – Ruderal / ephemeral	Back garden, soil, leaf litter and several herbaceous plants coverage.	71 m <sup>2</sup>	
Urban Tree	A semi-mature Italian alder ( <i>Alnus cordata</i> ) (T1) was present in the back garden.	n/a	
	Outside of the red-line boundary, in the opposing back gardens, three semi- mature trees were present.		

#### Table 2 - List of Habitats Surveyed in Ascending Order

#### Urban – Developed land, sealed surface

Numbers 25 and 26 Woburn Square were two terraced buildings constructed of brick (Photo 1), four storeys in height with a basement level and light wells (Photo 2). There were two flat roofs on an extension at the back of each building on the first floor (Photo 3). The fourth floor roof was pitched with slate tiles and one chimney stack each. The back of each building had an outside stairwell from the basement leading to a small garden at ground floor level.

#### Sparsely vegetated land – Ruderal / ephemeral

The small back garden was shared between both buildings. It had areas of soil, leaf litter and herbaceous plants (Photo 4). Species include tutsan (*Hypericum androsaemum*), bluebell (*Hyacinthoides* species), chickweed (*Stellaria media*), cleavers (*Galium aparine*), ivy (*Hedera helix*), soft shield fern (*Polystichum setiferum*), and creeping wood sorrel (*Oxalis corniculata*) (Photo 5).

There was a single specimen each of spotted laurel (*Aucuba japonica*) and Portugal laurel (*Prunus lusitanica*) within the back garden (Photo 6) and there was a second specimen of spotted laurel (Photo 7



#### **Urban Tree**

A semi-mature Italian alder (*Alnus cordata*) (T1) was present in the back garden (Photo 8.). An old stick nest was present in the canopy.

Outside of the red-line boundary, to the south-west of the site, were three semi-mature trees. A pollarded London plane (*Platanus × acerifolia*) (T4) was causing a bulge in the back wall (Photo 9). A pollarded Norway maple (T2) (*Acer platanoides*) was outside the back garden wall (Photo 10). A third tree was located further north-west along the wall (T3).

#### 2.2.3 Constraints and Recommendations

It is understood that the Italian alder

tree (T1), located within the Site in the back garden will be removed as a result of the Proposed Development. In addition, the London plane tree outside the Site, but immediately adjacent (T4) will be removed as it is damaging the south-western boundary wall and the wall will be repaired. Therefore, one off-site tree, within the zone of influence will be impacted by the Proposed Development. The trees will be assessed for arboriculture constraints prior to removal.

The trees and vegetation lost will be replaced by the soft landscaping proposals. The new landscaping will improve the Site for biodiversity (see Section 4) and will add connectivity to other green spaces on the wider UCLniversity campus. The Proposed Development will undergo a small-sites Biodiversity Net Gain assessment, as two trees will be impacted by the development.

## 2.3 Bats

#### 2.3.1 Data Search

The GiGL (Greenspace Information for Greater London) data search returned records for several bat species within 1km of the Survey Area from over the last ten years. The closest bat records were for common pipistrelle (*Pipistrellus pipistrellus*), recorded 261m to the east of the Site. The desk study returned:

- 19 records of common pipistrelle bat;
- Three records of bat in the *Pipistrellus* genus.
- Two records of bat in the Nyctalus genus.
- Six records of bat in the Vespertilionidae family.
- One record of a bat of indeterminate species.

#### 2.3.2 Field Survey

The buildings and tree within the Site, as well as trees adjacent to the Site (within 10m), were assessed for their suitability to support roosting bats, through the identification of potential roost features on the external elevations of the buildings and trees. No potential roosting features were identified on the buildings and trees. The potential suitability of the roosting habitat was Negligible.

The lone tree and three trees in the adjacent habitat could be used as flight-paths and foraging habitat for small numbers of bats. The trees were in the back garden of the terraced buildings at Woburn Square and were not illuminated. The potential suitability of the habitat for bat flight-paths and foraging was Low.

#### 2.3.3 Constraints and Recommendations

No further bat surveys are recommended.

If a bat is discovered unexpectedly during the works, then activities must stop. A Natural England European Protected Species (EPS) mitigation licence will then be likely to be required to proceed. An ecologist should be contacted for advice.

Though the trees and vegetation will be removed as a result of the Scheme, the impact on bat flight paths and forging habitats will be temporary as new habitat will be created that will enhance the Site for foraging and commuting bats.

The proposed new back garden has been designed as a "Rare Space Sanctuary Garden" for people living with rare forms of dementia, particularly visual and spatial forms of the condition. The garden will have a dual purpose in enhancing the Site for wildlife including bat flight lines and foraging.

Lighting for the Proposed Development should be low-level and sensitive to bats, following best practice guidance<sup>6</sup>. During construction, lighting should only be required during daylight hours and switched off at night on a timer. Lighting should be directional and focused downwards to prevent light spill. Similarly, the final lighting scheme should avoid obtrusive lighting in the well-being garden. Luminaires should be low lux level and be of warm colour temperatures i.e. 3000K. If any security lighting is required at night during construction, this should be on a motion sensor with a short (1min) timer.

<sup>&</sup>lt;sup>6</sup> Bat Conservation Trust and the Institution of Lighting Professionals (2023) Bats and Artificial Lighting at Night Guidance Note 08/23

If the mitigation and enhancement proposals are followed, no negative impacts on bats will occur as a result of the Scheme.

# 2.4 Birds

#### 2.4.1 Desk Study

There are recent records for 23 notable<sup>7</sup> bird species within the Study Area in the last 10 years.

These include five species listed on Annex I of the EC Birds Directive, eight species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), one Species of Principal Importance (SPI), five species on the Birds of Conservation Concern 4 (BoCC5) Red list and no (zero) species on the BoCC5 Amber list.

 Table 3. Notable Bird Species listed within 1km of the Survey Area over the last 10 years

Name	Latin	Legislation and policy	Distance from site (m)	Date of record
Baltic gull	Larus fuscus fuscus	London Protected Species	411	14/09/2019
Black Redstart	Phoenicurus ochruros	Schedule 1 of the Wildlife and Countryside Act London Protected Species Local Spp of Cons Conc	169	11/09/2014
Common Sandpiper	Actitis hypoleucos	London Protected Species	411	17/09/2018
Common Tern	Sterna hirundo	Birds Dir Anx 1	411	25/09/2018
Cuckoo	Cuculus canorus	NERC Act Section 41 London Protected Species Local Spp of Cons Conc Birds of Conservation Concern 4 Red List	411	03/10/2018
Fieldfare	Turdus pilaris	Schedule 1 of the Wildlife and Countryside Act Birds of Conservation Concern 4 Red List	411	28/01/2019
Firecrest	Regulus ignicapilla	Schedule 1 of the Wildlife and Countryside Act 1	411	31/03/2017
Goldeneye	Bucephala clangula	Birds of Conservation Concern 4 Red List	411	15/05/2018
Grey Wagtail	Motacilla cinerea	Local Spp of Cons Conc	309	03/06/2019
Herring Gull	Larus argentatus	Birds of Conservation Concern 4 Red List	411	11/12/2019
House Martin	Delichon urbicum	London Protected Species Birds of Conservation Concern 4 Red List	411	11/05/2018
Little Gull	Hydrocoloeus minutus	Birds Dir Anx 1 Schedule 1 of the Wildlife and Countryside Act	411	06/12/2018

<sup>7</sup> Notable bird species are taken as those listed: on Annex I of the EC Birds Directive (2009/147/EC); on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended); as Species of Principal Importance (SPI) for the Conservation of Biodiversity in England listed in Section 41 of the Natural Environment and Rural Communities Act 2006; as Red or Amber in the Birds of Conservation Concern (BoCC) 5 (Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. 2021. The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114: 723-747); bird species or groups listed under the Camden Biodiversity Strategy Action Plan.

Marsh Harrier	Circus aeruginosus	Birds Dir Anx 1 Schedule 1 of the Wildlife and Countryside Act	674	01/11/2016
Mediterranean Gull	lchthyaetus melanocephalus	Birds Dir Anx 1 Schedule 1 of the Wildlife and Countryside Act	411	17/06/2018
Red Kite	Milvus milvus	Birds Dir Anx 1 Schedule 1 of the Wildlife and Countryside Act	411	21/02/2017
Redwing	Turdus iliacus	Schedule 1 of the Wildlife and Countryside Act	411	07/02/2019
Sand Martin	Riparia riparia	London Protected Species	411	17/04/2018
Swift	Apus apus	London Protected Species Birds of Conservation Concern 4 Red List	309	16/07/2019

#### 2.4.2 Field Survey

The buildings within the Site did not have evidence of nesting birds, though there was potential for the roof ledges and flat roof to support nesting birds.

The tree in the back garden had an unoccupied stick nest, suitable for birds, in its canopy. The adjacent trees were pollarded and did not have suitability for nesting birds.

#### 2.4.3 Constraints and Recommendations

Breeding birds and their nests are protected under the Wildlife and Countryside Act (1981, as amended). Schedule 1 species are afforded additional protection which makes it an offence to disturb individuals of these species when 'at or near' an active nest.

As some bird species will nest all year, and due to the presence of an existing nest, the tree supporting the nest should be checked for nesting birds by an ecologist immediately prior (no more than 48hrs) to its removal. If the nest is active, works should be stopped immediately within an exclusion zone, to be determined by an ecologist (generally 5m radius but species dependent). The exclusion zone will be demarcated appropriately. The nest will subsequently be monitored, typically on a weekly basis, by a suitably qualified ecologist. Once it is confirmed that all fledglings have flown and ceased to return to the nest, and that no other nests are in use within the exclusion zone, the works can continue.

There was no evidence of nesting birds on the building. As a precautionary measure, a toolbox talk on the protection of nesting birds should be given to site staff prior to works commencing.

These requirements should be included as part of the Construction and Environmental Management Plan, or equivalent.

#### 2.5 Terrestrial Invertebrates

#### 2.5.1 Desk Study

There are two recent records of notable<sup>8</sup> terrestrial invertebrates within the Study Area, a small copper butterfly (*Lycaena phlaeas*) located 730m south-east and stag beetle (*Lucanus cervus*) located 650m south-west of the Site.

<sup>&</sup>lt;sup>8</sup> Notable terrestrial invertebrates are taken as principal species for the conservation of biodiversity listed under Section 41 of the Natural Environment and Rural Communities Act 2006; any invertebrate listed under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended); any invertebrate listed under Schedule 2 of the Conservation of Habitats and Species

#### 2.5.2 Field Survey

The plant species in the back garden, including sorrel, were suitable for the adults and caterpillars of small copper and other butterflies and moths. There were no deadwood piles suitable for stag beetle.

#### 2.5.3 Constraints and Recommendations

Opportunities for notable invertebrates will be temporarily impacted during works, but reestablished once the Proposed Development is complete as the habitats in the back garden will be recreated and enhanced. The Proposed Development could be enhanced for invertebrate species through the installation of log piles or pollinator boxes in the soft landscaping.

### 2.6 Invasive Non-Native Plants

#### 2.6.1 Desk Study

Eleven invasive non-native plant species; tree of heaven (*Alianthus altissima*), three cornered garlic (*Allium triquetium*) wall cotoneaster (*Cotoneaster horizontalis*) cherry laurel (*Prunus laurocerasus*), Japanese knotweed (*Reynoutria japonica*), snowberry (*Symphoricarpos albus*), evergreen oak (*Quercus ilex*), green alkanet (*Pentaglottis sempervirens*), gallant soldier (*Galinsoga parviflora*), butterfly-bush (*Buddleja davidii*) and orange balsam (*Impatiens capensis*), listed on either Schedule 9 of the Wildlife and Countryside Act (WCA), the Invasive Alien Species (Enforcement and Permitting) Order 2019, or the London Invasive Species Initiative were recorded within 1km of the Site over the last 10 years.

#### 2.6.2 Field Survey

No invasive non-native plants listed on invasive species legislation were found within the Site. However, a bluebell species was found within the Site. Spanish bluebell (*Hyacinthoides hispanica*) is listed on the London Invasive Species Initiative, where it is recommended not to plant this species.

#### 2.6.3 Constraints and Recommendations

While no invasive non-native plants were found on the Site, it is recommended that biosecurity protocols are implemented during the works of the Proposed Development in order to limit the spread of these species such as:

- pre-commencement checks of the Site for invasive non-native species.
- maintaining control over access and security to prevent fly-tipping as this is a common pathway for invasive non-native species.
- ensuring that any plant or other machinery and vehicles have been thoroughly cleared down prior to being brought onto site, particularly tyres, excavator tracks, buckets and drilling/soil boring devices.
- ensuring that vegetation used for soft landscaping is of local provenance to prevent plant diseases and parasites and checking for any additional plants 'hitch hiking' on the plants.
- ensuring clear and regular communication with stakeholders including members of the development team e.g. site contractors to inform them of the above biosecurity measures, such as a standard e-mail, posters and signage.

# 3. **Opportunities for Enhancements**

The Proposed Development has the opportunity to contribute to University College London's Wild Bloomsbury and Student Living Labs initiatives<sup>9</sup>, with the aim of delivering biodiverse spaces and more sustainable college campus and aligns with local planning policies and guidance in Camden.

The opportunities for biodiversity can support the use of the garden as a sanctuary for people with dementia. For example, if house sparrows are encouraged, they would have an auditory as well as visual impact, helping to

Regulations 2017 (as amended); any invertebrate listed in the IUCN Invertebrate Red Data Book (1991); and any invertebrate listed under the Westminster BAP.

<sup>&</sup>lt;sup>9</sup> https://www.ucl.ac.uk/sustainable/what-ucl-does/sustainable-campaigns/wild-bloomsbury

contribute towards a calm and relaxing environment. There is an opportunity to create the National Brain Appeal's "Rare Space" Garden as shown at 2023 RHS Chelsea Flower Show. Further discussion on location is required but it is anticipated that this could be the rear garden area . The following enhancements could be incorporated into the garden without impacting its visual appeal whilst increasing its biodiversity value:

- moss roofs on the two flat roofs;
- well-being garden and window boxes with wildflower friendly planting;
- house sparrow terraces on the buildings facing the garden;
- bird feeder and bird bath discetly located within the well-being garden;
- pollinator boxes on poles or fixed to the back wall;
- log piles tucked away in corner of the garden; and
- green wall (climbers on trellis or hedge).

This section describes potential ecological enhancements, aligning with the species and habitats targeted by UCL and the borough of Camden and the use of the proposed well-being garden for service users. These are high level opportunities and would need to be developed in greater detail once proposals are confirmed.

### 3.1 National Brain Appeal's "Rare Space" Garden

This garden would feature trees, hedges, shrubs and a range of herbaceous plants, consisting of both native, non-native and wildlife friendly plant species that would contribute to an increase in biodiversity, though the provision of cover and shade and foraging opportunities for bats, birds and invertebrates.

Chinese flowering dogwood trees were selected for the "Rare Space" garden as they would be drought tolerant and climate resilient.

Species with benefit for biodiversity are listed by recognised organisations such as the Royal Horticultural Society, Butterfly Conservation, UK Butterflies, Bat Conservation Trust, Natural England or similar. Links to some of these lists are provided below:

- Royal Horticultural Society: <u>https://www.rhs.org.uk/science/conservation-biodiversity/wildlife/plants-for-pollinators</u>; <u>https://www.rhs.org.uk/advice/profile?PID=497</u>; <u>https://www.rhs.org.uk/advice/pdfs/plants-for-bats.pdf</u>
- Butterfly Conservation: https://butterfly-conservation.org/sites/default/files/butterflynectardownload.pdf
- UK Butterflies: <a href="https://www.ukbutterflies.co.uk/foodplants.php">https://www.ukbutterflies.co.uk/foodplants.php</a>
- Bat Conservation Trust (May 2007) Encouraging Bats: A guide for bat-friendly gardening and living https://cdn.bats.org.uk/pdf/Resources/Encouraging Bats.pdf?mtime=20181101151549
- Natural England Plants for wildlife-friendly gardens <u>http://www.wlgf.org/neplants.pdf</u>

Invasive species listed on Schedule 9 of the Wildlife and Countryside Act and listed on the London Invasive Species Initiative (LISI)<sup>10</sup> should be avoided.

#### 3.2 Green wall

The garden could be improved for biodiversity through the creation of a green wall. This could consist integrated solutions or climbing plants trained on a trellis, or hedges along the back and sides of the garden.

Shade tolerant species could be included such as berry producing plants for birds, or/and flowers that have high pollen and nectar yields for pollinating insects. Night scented native plants beneficial for moths (and by extension bats) such as honeysuckle (*Lonicera periclymenum*) and night scented stock (*Matthiola longipetala*) could be included. These climbing plants could be trained on trellises to create a "green wall" and should consist of at least three species.

<sup>&</sup>lt;sup>10</sup> https://www.gigl.org.uk/our-data-holdings/species-data/london-invasive-species/

# 3.3 House sparrow terraces

The house sparrow is a London Biodiversity Action Plan priority species and so could benefit from targeted measures in the Proposed Development. It is a garden bird, suited to urban environments, living in small colonies/small families. Specially designed multi-cavity sparrow terraces could be installed on the buildings overlooking the back garden, where house sparrows would have foraging opportunities.

Additionally, a bird bath and feeding perch could be added to the back garden to create an attractive habitat for house sparrows and contributing to the natural ambience of the garden for relaxing and recuperating.

### 3.4 Pollinator boxes

Invertebrates could be encouraged within the garden not only by the flowering plants but also by providing shelter for them. Pollinator boxes could be fixed to poles or on the back wall. Increased opportunities for pollinators in turn increases foraging opportunities for other wildlife, such as bats and birds.

## 3.5 Soil insects and other invertebrates

Small log piles could be tucked away in one of the corners of the garden to provide habitat for a diversity of invertebrate species. Retaining some soil from the existing back gardens and using it to "seed" invertebrates into the new garden would help to establish a healthy soil fauna.

## 3.6 Window planters

Planters on the window balconies facing Woburn Square could be planted with wildflowers and herbs to attract pollinators to enhance the biodiversity of the Proposed Development. Plant species from the RHS list could be included.

## 3.7 Green roofs

There are two flat roof spaces suitable to be converted to green roofs. An ultra-thin moss roof would be lightweight and require less maintenance than sedum roofs. An example supplier is Oppla (Netherland and UK) (<u>https://oppla.eu/casestudy/18870</u>). As they establish quickly, they should provide foraging for invertebrates and for birds such as house sparrow.

# 4. Conclusion

This PEAR is based on a desk study and ecological surveys undertaken in April and May 2024, to assess the ecological constraints to the Proposed Development and to provide recommendations and mitigation in respect of a planning submission.

If mitigation measures detailed in this document are carried out, there will be no negative impacts on nearby designated sites, bat flight lines and foraging, nesting birds, notable invertebrates, and the spread of invasive species will be avoided.

The biodiversity of the Site could be enhanced through the inclusion of ecological enhancements within the Proposed Development including a well-being garden with green roofs, window boxes with wildlife friendly planting, house sparrow terrace boxes, pollinator boxes, log piles and green walls. This will benefit the ecological connectivity to green spaces on the university campus and in the wider Camden Borough.

## 4.1 Re-Survey of Site

Due to the mobility of animals and the potential for colonisation of the Site, it is recommended that an updated ecological survey be undertaken prior to the redevelopment of this Site should this not occur within 18 months of the date of the field survey. This in accordance with guidelines from CIEEM<sup>11</sup>.

<sup>&</sup>lt;sup>11</sup> CIEEM (2019). Advice note on the lifespan of ecological reports and surveys

# Appendix A UKHab Map

Figure 1. UKHab map



# Appendix B Relevant Legislation and Planning Policy

# Legislation

The UK is no longer a member of the European Union (EU). EU legislation as it applied to the UK on 31 December 2020 is now a part of UK domestic legislation. EU legislation which applied directly or indirectly to the UK before 11.00 p.m. on 31 December 2020 has been retained in UK law as a form of domestic legislation known as 'retained EU legislation'.

The Secretary of State for the Environment, Food and Rural Affairs and Welsh Ministers have made changes to parts of the *Conservation of Habitats and Species Regulations 2017* (referred to as the 2017 Regulations) so that they operate effectively. Most of these changes involve transferring functions from the European Commission to the appropriate authorities in England. All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

## **B.1 Designated Sites**

#### B1.1 Special Protection Areas (SPA) / Special Areas of Conservation (SAC)

These sites in the UK no longer form part of the EU's Natura 2000 ecological network. The *Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019* (referred to as the 2019 Regulations) have created a national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:

- existing SACs and SPAs
- new SACs and SPAs designated under these Regulations

Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new national site network.

Formal Appropriate Assessment is required to be undertaken by the competent authority before undertaking, or giving consent, permission or other authorisation for any work which are likely to have a significant effect on such a site.

#### **B.1.2 Wetland of International Importance (Ramsar site)**

Designated under the *Convention on Wetlands of International Importance especially as Waterfowl Habitat 1971* (the Ramsar Convention), in the UK, these sites are treated as having the same level of protection as SPA's and SAC's.

#### **B.1.3 Sites of Special Scientific Interest**

Under the *Wildlife and Countryside Act 1981* (as amended), it is an offence to carry out or permit to be carried out any operations likely to damage the Site of Special Scientific Interest (SSSI). These operations are listed in the SSSI notification.

Owners, occupiers, public bodies and statutory undertakers must give notice and obtain the appropriate consent under S.28 of the *Wildlife and Countryside Act 1981* (as amended), before undertaking operations likely to damage a SSSI.

#### **B.1.4 National Nature Reserve**

National Nature Reserves (NNR) are established under the National Parks and Access to the Countryside Act 1949. Most NNRs are also underpinned by SSSIs and are therefore protected by the measures detailed above. For NNRs not underpinned by SSSIs it is still an offence to carry out or permit to be carried out any potentially damaging operation.

NNRs are given protection through policies in a local development plan.

#### **B.1.5 Local Nature Reserve**

A Local Nature Reserve (LNR) is a statutory designation made under National Parks and Access to the Countryside Act 1949, by principal local authorities (district, borough or unitary councils).

The local authority must control the LNR land – either through ownership, a lease or an agreement with the owner.

LNRs are given protection through policies in a local development plan.

#### **B.1.6 Locally Designated Sites**

These are non-statutory designated sites within 1km of the Proposed Development. These are Sites of Importance for Nature Conservation (SINCs). These are recognised by the Greater London Authority and London borough councils as important wildlife sites.

There are three tiers of sites:

- Sites of Metropolitan Importance (SMINC)
- Sites of Borough Importance (borough I and borough II) (SBINCI and SBINCII respectively)
- Sites of Local Importance (SLINC)

### **B.2** Protected Species

#### i) Bats /Terrestrial Invertebrates

These species, known as European Protected Species, are protected under Regulation 43 of the 2017 Regulations as amended by the 2019 Regulations. This makes it an offence to deliberately capture, injure or kill an animal; deliberately disturb an animal; or damage or destroy a breeding site or resting place used by an animal.

Deliberate capture or killing is taken to include "accepting the possibility" of such capture or killing. Deliberate disturbance of animals includes in particular any disturbance which is likely a) to impair their ability (i) to survive, to breed or reproduce, or to rear or nurture their young, or (ii) in the case of animals of 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.

Where development works are at risk of causing one or more of the offences listed above, a mitigation licence from Natural England can be obtained to facilitate the works that would otherwise be illegal.

These species are also protected under Schedule 5 of the *Wildlife and Countryside Act 1981* (as amended). This makes it an offence to intentionally or recklessly obstruct access to any structure or place used for shelter or protection or disturb an animal in such a place.

Lower levels of disturbance not covered by the *Conservation of Habitats and Species Regulations 2017* remain an offence under the *Wildlife and Countryside Act 1981* although a defence is available where such actions are the incidental result of a lawful activity that could not reasonably be avoided.

#### ii) Nesting Birds

All wild birds are protected under the *Wildlife and Countryside Act 1981* (as amended), with some species afforded greater protection under Schedule 1 of the *Wildlife and Countryside Act 1981* (as amended). In addition to the protection from killing or taking that all birds receive, Schedule 1 birds and their young must not be disturbed at the nest.

There are no licensing purposes that explicitly cover development activities affecting wild birds.

# B.3 Species and Habitats of Principal Importance for the Conservation of Biodiversity

Section 40 of the Natural Environment & Rural Communities Act (NERC) 2006 as amended sets out the duty for public authorities to conserve biodiversity in England.

Habitats and species of principal importance for the conservation of biodiversity are identified by the Secretary of State for England, in consultation with Natural England, are referred to in Section 41 of the NERC Act for England

(as amended). The list, known as the 'England Biodiversity List', of habitats and species can be found on the Natural England web site.

The 'England Biodiversity List' is used as a guide for decision makers such as public bodies, including local and regional authorities, in implementing their duty under Section 40 of the NERC Act 2006 as amended to have regard to the conservation of biodiversity in England when carrying out their normal functions.

# **B.4** Non-native Invasive Plant Species

Species listed on Schedule 9 of the *Wildlife and Countryside Act 1981 (as amended),* it is an offence to plant or otherwise cause these species to grow in the wild.

Any contaminated soil or plant material is classified as controlled waste and should be disposed of in a suitably licensed landfill site, accompanied by appropriate Waste Transfer documentation, and must comply with Section 34 of the *Environmental Protection Act 1990*<sup>12</sup>.

Species listed on the *Invasive Alien Species (Enforcement and Permitting) Act (2019)*, as well as species listed on the guidance outlined in the *London Invasive Species Initiative (LISI) 2004*<sup>13</sup> should be considered.

# B.5 Planning Policy

## i) National Planning Policy Framework, 2021

Although not the primary governing policy document for the purposes of a harbour facility NSIP, the NPPF is nevertheless still an important policy document in respect of ecology and has been taken into account when preparing this PEAR. The NPPF was first published in March 2012 and has been updated in July 2018, February 2019, July 2021 and most recently in September 2023.<sup>14</sup>

The NPPF states the commitment of the UK Government to minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity. It specifies the obligations that the Local Authorities and the UK Government have regarding statutory designated sites and protected species under UK and international legislation and how this it to be delivered in the planning system. Protected or notable habitats and species can be a material consideration in planning decisions and may therefore make some sites unsuitable for particular types of development, or if development is permitted, mitigation measures may be required to avoid or minimise impacts on certain habitats and species, or where impact is unavoidable, compensation may be required.

Chapter 15 of the NPPF 'Conserving and enhancing the natural environment' sets out the requirements to consider biodiversity in planning decisions. A summary of the paragraphs of the NPPF relevant to terrestrial ecology and nature conservation, and to the IERRT project, is provided below.

Paragraph 174 states that "Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

*b)* recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development

<sup>&</sup>lt;sup>12</sup> Environment Agency (2016) Treatment and disposal of invasive non-native plants: Regulatory Position Statement 178

<sup>&</sup>lt;sup>13</sup> London Invasive Species Initiative (2004) Species of Concern in London

<sup>&</sup>lt;sup>14</sup> https://www.gov.uk/government/publications/national-planning-policy-framework--2

should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate".

Paragraph 175 states that "Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries."

Paragraph 179 states that "To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

*b)* 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".

Paragraph 180 states that "When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity."

# ii) Regional Planning Policy

Regional Planning Policy includes the London Plan 2021 and the London Environment Strategy 2018.

#### Table 4. Summary of Regional Planning Policy

Document	Planning Policy	Purpose
London Environment Strategy (2018) (sets out the Mayor's vision for London's environment to 2050, and	Policy 5.1.1	Protect, enhance and increase green areas in the city, to provide green infrastructure services and benefits that London needs now and in the future.
includes a number of policies, aspirations and guidance)	Policy 5.1.2	Protect, conserve, and enhance the landscape and cultural value of London's green infrastructure.
	Policy 5.2.1	Protect a core network of nature conservation sites and ensure a net gain in biodiversity.

	Policy 5.3.1	Address underinvestment, and improve the management of London's green infrastructure, by developing new business models and improving the awareness of the benefits of London's green infrastructure.
London Plan. The Spatial Development Strategy for Greater London (March 2021)	Policy G1 Green Infrastructure	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. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network
	Policy G2 London's Green Belt	The Green Belt should be protected from inappropriate developments. The enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.
	Policy G4 Open space	Development Plans should promote the creation of new areas of publicly-accessible open space particularly green space, and should not result in the loss of protected open space.
	Policy G5 Urban greening	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. In the interim, the Mayor recommends a target Urban Greening Factor (UGF) 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).
	Policy G6 Biodiversity and access to nature	Sites of Importance for Nature Conservation (SINCs) should be protected. Development Plans should 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 and seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context. 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.
	Policy G7 Trees and woodlands	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. 'Veteran' trees and ancient woodland should be protected and opportunities for tree planting in strategic locations identified. Development proposals should ensure that, wherever possible, existing trees of value are retained. If trees are removed there should be adequate replacement based on the existing value of the benefits of the trees removed.

# iii) Local Planning Policy

A summary of the relevant local planning policy is provided below. For the precise wording of each specific policy please refer back to the source document. This planning policy has been considered when addressing potential

ecological constraints and opportunities identified by the desk study and field surveys and when addressing requirements for further survey, design option and ecological mitigation.

- The Camden Draft New Local Plan was published for review in January 2024. It will cover the period from 2026 2041.
- The Biodiversity Strategy for Camden<sup>15</sup> was published in 2022 and continues the principles of the previous Biodiversity Action Plan (see Section iv).

#### Table 5. Summary of Local Planning Policy

Document	Planning Policy	Purpose
Draft New Local Plan 2024	NE2 Biodiversity	The Council will seek to ensure that development protects and enhances nature conservation and biodiversity in the Borough. The Council will: <i>"i. Safeguard protected and priority habitats and species, Sites of Importance for Nature Conservation (SINC) and other features of biodiversity value such as wildlife corridors and stepping stones;</i>
		ii. Require all major schemes, and those that have the potential to impact biodiversity and designated sites, to prepare a baseline ecological assessment, and demonstrate how any impacts on biodiversity can be avoided or mitigated and establish how biodiversity enhancements will be maximized. Where mitigation measures are proposed these should be delivered on-site, unless it can be demonstrated to the Council's satisfaction that this isn't achievable;
		iii. Address the potential of both direct and indirect impacts on habitats and species, from factors such as shading, light pollution and risk of disturbance and expect development to follow the mitigation hierarchy with regards to these impacts (avoiding impacts where possible; where this is not feasible seek to mitigate impact; and only where the impact is not capable of being avoided or mitigated, seek compensation for the loss/harm);
		iv. Resist development where it is likely to worsen deficiencies in access to natural greenspace.
		v. Expect development to realise benefits for biodiversity through their layout, design and the materials used in their built and landscaping elements, taking account of the local ecological context, strategic and local opportunities for biodiversity gains identified in the Council's Biodiversity Strategy and emerging Nature Recovery Network, neighbourhood plans and Local Plan site allocations;
		vi. Require biodiversity net gain of at least 10% on eligible sites, with preference given for on-site or near site solutions. The net gains will be secured for a period of at least 30 years;
		vii. Recognise the biodiversity value offered by gardens;
		viii. Seek biodiversity enhancements commensurate with the scale of proposed residential and non-residential extensions and alterations, including the provision of biodiverse green roofs and species features such as bird and bat boxes; and
		ix. Secure long-term management plans and monitoring of schemes, where appropriate, to ensure that nature conservation objectives are met. We will also expect Construction Management Plans to provide information on how habitats will be protected during building work, where appropriate".
	NE1 Natural	The Council will conserve and enhance Camden's natural environment. The Council will:
	Environment	<i>"i. Protect and enhance the network of open spaces and local green spaces across the borough in accordance with Policy SC3 Open Space;</i>
		ii. Give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL);
		<li>iii. Designate and protect nature conservation sites (including the Ancient Woodland on Hampstead Heath) and other features of biodiversity value, such as Sites of Importance for Nature Conservation, corridors and stepping-stones in accordance with NE2 Biodiversity;</li>
		<ul> <li>iv. Support communities seeking the designation of Local Green Spaces through the neighbourhood planning process;</li> </ul>
		<ul> <li>Protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;</li> </ul>
		vi. Preserve and enhance Hampstead Heath through working with partners and by taking into account the impact on the Heath when considering relevant planning applications, including any impacts on views to and from the Heath;
		vii. Work with partners to preserve and enhance the Regent's Canal, including its setting, and balance the differing demands on the Canal and its towpath;
		viii. Require all development to enhance biodiversity in line with Policy NE2 Biodiversity;

<sup>15</sup> Camden Council (2022) Creating Spaces for Nature.

 $<sup>\</sup>frac{https://www.camden.gov.uk/documents/20142/0/Creating+space+for+nature+in+Camden+web.pdf/cd72648d-b3e3-a512-dafc-dd02f15144c3?t=1645810143538$ 

		ix. Protect trees in Camden and seek to secure additional trees in accordance with Policy NE3 Tree Planting and Protection;
		x. Secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;
		xi. Encourage the delivery of highways greening measures in accordance with Policy T1 Safe, Healthy and Sustainable Transport;
		xii. Require multi-functional Sustainable Urban Drainage Systems (SuDs) to be provided in accordance with Policy CC12 Sustainable Drainage;
		xiii. Seek to improve opportunities for residents and the public to access and engage with nature, particularly in areas where such opportunities are lacking; and
		xiv. Seek contributions from development to the delivery of the priorities and projects set out in the Local Nature Recovery Strategy, Camden Biodiversity Strategy and Camden Green Infrastructure Strategy."
Camden Local Plan (2017)	A3 Biodiversity	The Council will protect and enhance sites of nature conservation and biodiversity. The Council will also protect, and seek to secure additional, trees and vegetation.
		Policy A3 is intended to support the London Biodiversity Strategy and the Camden Biodiversity Action Plan (BAP) by ensuring Camden's growth is accompanied by a significant enhancement in the borough's biodiversity.
		The Council aims to maximise opportunities for biodiversity in and around developments in order to deliver a net gain in biodiversity and a range of wider environmental benefits.
	CC2 Climate Change	Camden's Development Policy DP22 states that: "Schemes must incorporate green and brown roofs and green walls unless it is demonstrated that this is not possible or appropriate. This includes new and existing buildings. Special consideration will be given to historic buildings to ensure architectural and historic features are preserved".
Camden Planning Guidance (26 March 2018)	Biodiversity	This guidance is for planning proposals for major and minor developments proposed on sites where there is biodiversity value. It supports policy A3 - Biodiversity in the Camden Local Plan (2017). This provides more specific advice for smaller proposals and how to identify existing biodiversity considerations and incorporate or enhance biodiversity.
		Applicants are advised to employ the services of a professional ecological consultant as it

Applicants are advised to employ the services of a professional ecological consultant as it may not appear immediately obvious that a protected species is present on a site or will be impacted upon by a proposal. Protected species such as bats, may be found throughout Camden in buildings, or in structures and using features for foraging or commuting.

# iv) Local Biodiversity Action Plans

The Camden Local Biodiversity Action Plan (BAP) is detailed below.

#### Table 6. The Camden Local Biodiversity Action Plan (BAP) 2013-2018

The London Borough of Camden Biodiversity Action Plan 2013 - 2018	The Plan outlines a series of actions to ensure that biodiversity is safeguarded in the borough and that Camden's residents are given opportunities to access the natural environment.		
	Priority habitats include both acid grassland and heathland.		
	Priority species include peregrine falcon, all bats species, stag beetle and a number of BAP priority butterflies.		

# Appendix C Methodology

# C.1 Desk Study

#### i) Background Records Search

The preliminary ecological assessment includes a desk study to obtain background records relevant to a Site and the Proposed Development. The data obtained provides contextual information for the scope of field surveys, to aid the evaluation of field survey results, and to provide supplementary information where complete field survey coverage is not possible.

The Study Area is dependent upon the nature, timing and scale of the Proposed Development, as well as the location of the Site and the surrounding landscape. These variables all contribute to what is referred to as the Zone of Influence (ZoI) of the Scheme, which is the area over which ecological features may be affected by biophysical changes because of the works and associated activities.

In May 2024 the Greenspace Information for Greater London (GiGL) was contacted to obtain the following ecological data:

- Records of non-statutory designated sites (Sites of Importance for Nature Conservation (SINCs)) within 1km of the Site boundary;
- Records of legally protected and notable species (fauna and flora) within 1km of the Site boundary, including Species of Principal Importance for the Conservation of Biodiversity listed under Section 41 of the Natural Environment & Rural Communities Act 2006 as amended in the England Biodiversity List<sup>16</sup>

The Multi-Agency Geographic Information for the Countryside (MAGIC) website (www.magic.gov.uk) was reviewed for the following information:

- Designated sites of nature conservation importance (statutory sites only) within 2km of the Site. This
  was extended to 10km for internationally designated sites: Special Protection Areas (SPAs), Wetlands
  of International Importance (Ramsar sites) and Special Areas of Conservation (SACs); and,
- Notable habitats within 0.5km of the Site, these being areas of ancient woodland and 'Habitats of Principal Importance for the Conservation of Biodiversity' included in the England Biodiversity List<sup>16</sup>.

# C.2 Field Survey

The preliminary ecological assessment included a walkover survey of the Site on 29<sup>th</sup> April 2024 (all land within the Site and 30m in adjacent areas), in line with the standard best practice UK habitats classification methodology as set out by UKHab V2.01 (2023)<sup>17</sup>.

During the walkover survey, the following protected or notable species were considered:

- **Bats**: Surveyors identify and record any structures, trees and other features that could be suitable for bats to roost in and any habitats that could be suitable for bats to commute, forage or swarm in/at, in accordance with Bat Conservation Trust (BCT) guidance (2023)<sup>18</sup>;
- **Birds**: the survey involved assessing the potential of habitats within the Survey Area to support breeding, either individually notable species or assemblages of both common and rarer species;
- **Non-native invasive plant species**: the survey involved recording evidence of the presence of invasive plants listed on Schedule 9 of the *Wildlife and Countryside Act 1981* (as amended) and subject to strict legal control.

<sup>&</sup>lt;sup>16</sup> Section 40 of the Natural Environment & Rural Communities (NERC) Act 2006 requires that eThe Secretary of State has drawn up, in accordance with Section 41 of the Act and in consultation with Natural England, a list of habitats and species of principal importance for the conservation of biodiversity in England that is known as the <u>England Biodiversity List</u> <sup>17</sup> Butcher, B., Carey, P., Edmons, R., Norton, L. and Treweek, J. (2023) The UK Habitat Classification User Manual Version

<sup>2.01</sup> at <u>http://www.ukhab.org/</u> <sup>18</sup>. Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th edition, Bat Conservation

<sup>&</sup>lt;sup>18</sup>. Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th edition, Bat Conservation Trust. London.

Potential Roosting habitat

# C.3 Daytime Bat Walkover

During the Survey, a Daytime Bat Walkover Survey (DBW) was undertaken to observe, assess and record any habitats suitable for bats to roost, commute and forage. A bat Ground-Level Tree Assessment (GLTA) was also undertaken for any trees within the Site. These surveys followed the 2023 Bat Conservation Trust (BCT) guidelines<sup>19</sup>. Surveyors identified and recorded any structures, trees and other features that could be suitable for bats to roost in and any habitats that could be suitable for bats to commute, forage or swarm in/at. Surveyors searched from ground-level for potential roosting features on trees. For buildings, an external inspection was made from ground level. No access was gained to the roof. On the basis of this survey, each building or tree was classified per its suitability to support roosting bats see **Table 7** and **Table 8**. Concurrently with the bat roost assessment, an appraisal was made of bird nesting potential of buildings, trees and other vegetation, if present.

Suitability		·
None	No habitat features on site or complete absence of crevices	No habitat on site likely to be used at any time of the year
Negligible	No obvious habitat features on site; however a small element of uncertainty remains	No obvious habitat on site, however a small element of uncertainty remains
Low	A structure with one or more potential roost features that could be used by individual bats opportunistically at any time of the year. Unsuitable for large numbers of bats.	Habitat that could be used by small numbers of bats as flightpaths such as gaps in hedgerows or unvegetated stream, not very well connected. Suitable but isolated habitat that could be used by small numbers of foraging bat such as a lone tree or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions, and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only).	Continuous habitat connected to the wider landscape that could be used by bats for flight paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to wider landscape that could be used by bats for foraging such as trees, scrub, grassland, or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to the size, shelter, protection, conditions, and surrounding habitat. These structures have the potential to support high conservation status roosts.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight paths such as river valleys streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well-connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses, and grazed parkland. Site is close to and connected to known roosts.

Table 7	7. Guid	lelines	for ass	sessing	the potenti	al suitability	/ of roosting	habitat ii	n structures	and f	ilight ·
paths/	foragin	g area	s for ro	osting I	oats						

Flight-paths and foraging habitats

Source: Adapted from Table 4.1 within the Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023)<sup>20</sup>

Suitability	Description	Ground Level Tree Assessment / Aerial Survey Further Assessment Description
NONE	Either no PRFs in the tree or highly unlikely to be any.	

#### Table 8. Criteria used to describe the potential suitability of trees to support roosting bats

<sup>&</sup>lt;sup>19</sup> Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th edition, Bat Conservation Trust. London

<sup>&</sup>lt;sup>20</sup> Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th edition, Bat Conservation Trust. London

FAR	Further assessment required to establish if PRFs are present in the tree.	PRF-I - Feature suitable for individual bats or PRF-M – Feature suitable for multiple
PRF	A tree with at least one PRF present	bats/maternity roost. Or might be scoped out as NONE.

# C.4 Limitations and Assumptions

The ecological surveys represent only a 'snapshot' in time of the ecological condition of the Site. The ecological character of the Site could change substantially throughout both the course of a year, and from year to year, impacting on the extent and quality of habitats and those habitat's potential to support protected species.

All design and habitat distances and areas given are approximate.

None of these limitations either singly or in combination is significant enough to affect the baseline, impact assessment and resulting mitigation or enhancement referenced in this report.

# Appendix D Target Notes and Photographs

Target Note	Description	Photograph(s)
	Front of 25 Woburn Square	<image/> <image/> <image/>
	Basement level and light well	<image/>









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