PRELIMINARY ECOLOGICAL APPRAISAL
Royal Central School of Speech and Drama

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Executive Summary

Purpose

This report presents a Preliminary Ecological Appraisal (PEA) assessment for proposed works at the Royal Central School of Speech and Drama in, Eton Ave, Belsize Park, London NW3 3HY (National Grid Refence for the centre of the site TQ 26706 84406). The report has been prepared to establish the site's suitability for development, inform the design process for the proposal, record the ecological baseline and identify key ecological features within and around the proposal site.

Introduction

A PEA, consisting of a field survey and desk study, was undertaken in August 2024. The PEA report was completed in consideration of the Chartered Institute of Ecology and Environmental Management (CIEEM) Preliminary Ecological Appraisal (2017) guidelines, the UKHab Classification User Manual (UKHab Version 2.0, 2023) and British Standard 42020 (2013) 'Biodiversity – Code of Practise for Planning and Development'.

The site is located near Swiss cottage underground and is part of the Royal Central School of Speech and Drama.

Key Findings and Recommendations

Habitat: Based on the findings of the PEA, the majority of habitats on-site have low ecological value. The comprehensive UKHab habitat survey revealed that the site is primarily composed of buildings and hardstanding area.

Designated Sites: There was there is one Special Protection Area (SPA) and Ramsar Site within 10 km of the site (Lee Valley), one Site of Special Scientific Interest (SSSI) and one National Nature Reserve (NNR) within 5 km and three Local Nature Reserves (LNRs) within 2 km. In addition, there were six Sites of Importance for Nature Conservation (SINCs) present within the search area (1 km). However, given the urban nature of the site, there is limited connectivity between the site and the designated sites.

Birds: Opportunities for low numbers of nesting birds were present throughout the site, however no active nests were seen during the UKHab habitat survey. To ensure legal compliance, clearance of habitat suitable for nesting birds (all vegetation and buildings) should be undertaken outside the nesting bird season (i.e., between October and February inclusive). Invasive species: It is recommended that the invasive plant species present throughout the site are removed, in order to reduce the risk of spread when disturbed during works. Their replacement with native species planting will increase the value of the site for local biodiversity.

Bats: the buildings were considered to support negligible potential for roosting bats, with negligible potential for commuting/foraging bats given the highly urban context of the area.

Invasives plant species: Tree-of-heaven (*Ailanthus altissima*), which is listed on the London Invasive Species Inventory, was located on the site. It is recommended that an invasive plant species method statement be submitted post-planning to detail how these plants will be managed during construction, although this is not a legal requirement.

Conclusion

Based on the findings of the PEA, the site has low ecological value. The Proposed Development provides exciting opportunities for biodiversity enhancement such as shrub, tree, and grassland planting to compensate for any vegetation loss on the site and contribute to urban greening.

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1. Purpose of the Document

1.1.1 The purpose of this document is to provide information regarding any protected and/or notable habitats and species that occur or have the potential to occur on or near the potential location for development and identify the potential impacts of the work.

1.1.2 BNG is an iterative process that requires a suitably experienced ecological practitioner to input into the design to ensure sound ecological principles are embedded in the design from the start (i.e., before concept design).

1.1.3 This assessment has been designed to meet:

- Chartered Institute of Ecology and Environmental Management (CIEEM) 'Guidelines for Preliminary Ecological Appraisal' (2017)[1],
- CIEEM 'Guidelines for Ecological Impact Assessment (EcIA)' (2018)[2],
- British Standard 42020 (2013) 'Biodiversity – Code of Practice for Planning and Development'[3].

1.1.4 The objectives are to:

- Identify any designated sites for nature conservation and habitats on, near and/or adjacent to the site;
- Identify any notable and/or protected plant or animal species of nature conservation value, which may occur on or near the site;
- Identify the presence of any invasive plant species on or adjacent to the site;
- Provide a habitat map with target notes of ecological features as identified above;
- Undertake a preliminary assessment of the potential impacts on any ecological receptors of conservation value identified on, near or adjacent to the site;
- Input into the embedded design in terms of biodiversity net gain; and
- Recommend further surveys, mitigation, and enhancement measures as appropriate.

1.2 Validity of Data

1.2.1 The findings of this study are valid for a period of 24 months from the survey on 16th of August 2024. If works have not commenced within a year of this date, then an updated site visit should be carried out by a suitably qualified ecologist to assess any changes in the habitats present on site, and to inform a review of the conclusions and recommendations made.

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1 CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.

2 CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

3 BSI (2013) British Standard 42020:2013 Biodiversity – Code of Practice for Planning and Development. British Standards Institute, London.

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2. Introduction

2.1 Background Information

2.1.1 Assystem was appointed by AJA Ltd to carry out an extended UK Habitat Classification survey (UKHab) of land at Royal Central School of Speech and Drama, Eton Ave, Belsize Park, London NW3 3HY (National Grid Refence for the centre of the site TQ 26706 84406) in order to prepare a Preliminary Ecological Appraisal (PEA) to assess whether the site is a viable location for potential development.

2.1.2 By undertaking an investigation of the habitats and species present, this report will provide the Applicant with a greater understanding of the ecological value of the area. It identifies any potential risks, obligations and restrictions that may be necessary to guarantee compliance with wildlife legislation, along with any potential opportunities to increase the local biodiversity.

2.2 Site Description

2.2.1 The c. 2,716 m^2 site comprises an existing building (i.e., the Norman Collins building) with associated hardstanding. An area of modified grassland is present in the eastern side of the site, with mostly empty planters on and adjacent to the grassland. Three areas of introduced shrub are located around the periphery of the site. The site is identified in Figure 1.

2.2.2 The surrounding area comprises predominantly residential properties with associated vegetated gardens, including South Hampstead to the west and Belsize Park to the north and east. Approximately 700 m south-east of the site lies Primrose Hill public park which is separated from The Regent's Park by Prince Albert Road and the ZSL London Zoo.

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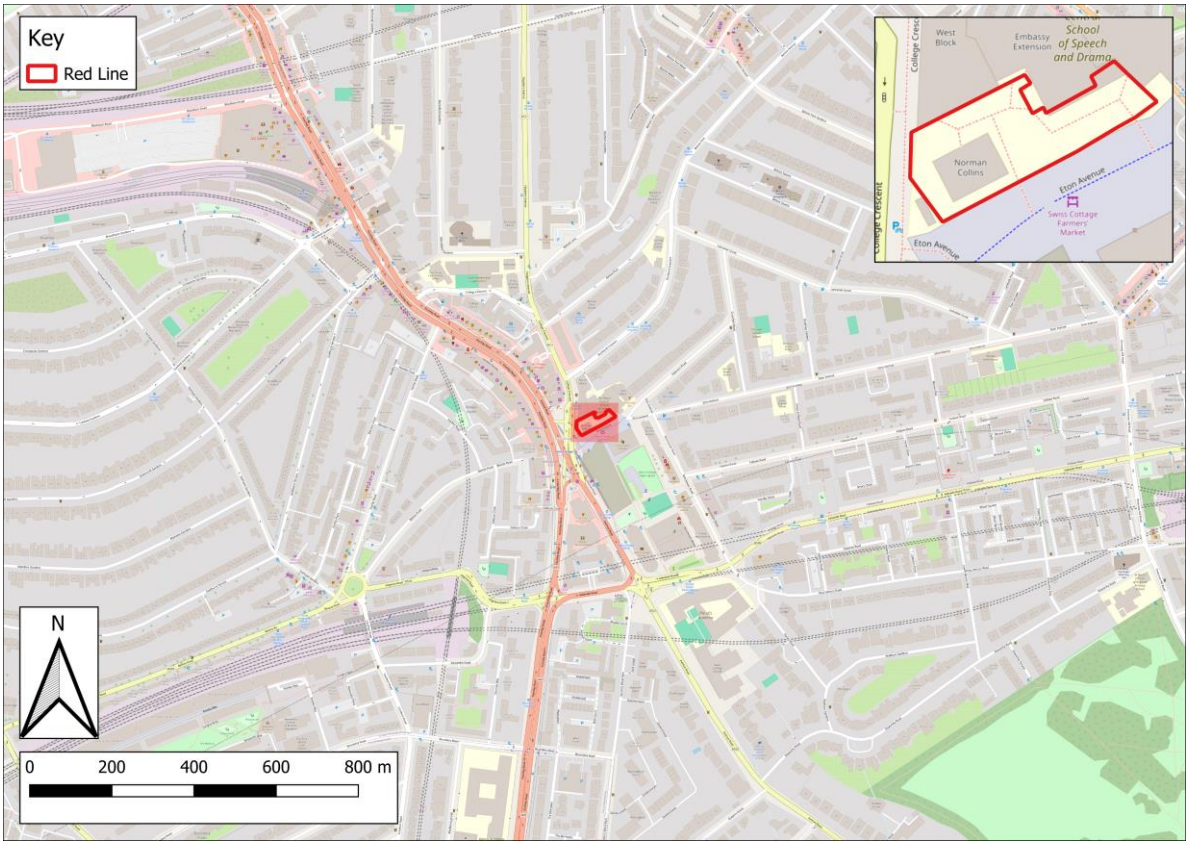
Figure 1 **Site Location** (Contains map data from © OpenStreetMap)



2.3 Scope of Works

2.3.1 Assystem was commissioned by AJA Ltd to undertake the following surveys which form part of this PEA:

- Desktop study and ecological data search; and
- Extended UK Habitat Classification survey (UKHab) (extended to include a protected species search). The condition of habitats was recorded during the UKHab survey, such that the information can inform the Biodiversity Net Gain (BNG) baseline calculations.

2.4 Planning Policy

2.4.1 National, regional, and local planning policies help guide the proposed development. The following paragraphs identify relevant planning policies and discuss these in the context of the site.

National

2.4.2 Under the Natural Environment and Rural Communities (NERC) Act 2006, "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity". To comply with this 'Biodiversity Duty', planning decisions must ensure that they adequately consider the potential ecological impacts of a proposed development.

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2.4.3 National policy guidance is provided by National Planning Policy Framework (NPPF)[4], which sets out the Government's planning policies for England and how they should be applied. The section on habitats and biodiversity notes in Paragraph 185 (b) that plans should "*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*"; and that in determining planning applications, local planning authorities should follow certain principles, including the following in Paragraph 186:

- 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;
- Development on land within or outside a Site of Special Scientific Interest (SSSI), 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 SSSIs;
- Opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

2.4.4 Further supporting information regarding the application of planning policy is provided in Planning Practice Guidance (PPG)[5]. The PPG identifies that information on biodiversity impacts and opportunities should inform all stages of development, with planning applications requiring an ecological survey where the type and location of development are such that the impact on biodiversity may be significant and existing information is lacking or inadequate (Paragraph 18). The PPG also identifies that detailed species surveys should only be required by local planning authorities where clearly justified and proportionate to the nature and scale of development proposed and the likely impact, i.e. there is a reasonable likelihood of a protected species being present and affected by the development.

Metropolitan

2.4.5 The London Plan[6] provides strategic planning direction at the Greater London scale, produced by the GLA and setting out a framework of economic, environmental transport and social policies for the development of London.

2.4.6 Policy G6 on Biodiversity and Access to Nature provides the principal policy for the protection and enhancement of biodiversity. The Policy identifies that '*development should manage impacts on biodiversity and aim to secure net biodiversity gain*' and that Sites of Importance for Nature Conservation (SINCs) should be protected or, where impacts are unavoidable, the benefits of the development clearly outweigh the impacts on biodiversity the mitigation hierarchy applied to minimise development impacts.

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4 Ministry of Housing, Communities and Local Government (2023) National Planning Policy Framework
5 Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance – Natural Environment.
6 Greater London Authority (2021) The London Plan, The Spatial Development Strategy for Greater London, March 2021.

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2.4.7 Policy G5 (Urban Greening) establishes the requirement for major development to incorporate urban greening as a fundamental element of site and building design and establishes the requirement for development to achieve a high level of urban greening, demonstrated through the Urban Greening Factor (UGF). Policy G1 (Green Infrastructure) requires development to integrate green infrastructure that connects with London's wider green infrastructure network and Policy G7 (Trees and Woodland) places an emphasis on the retention of existing trees of value where possible.

Local

2.4.8 Camden Local Plan:[7]

2.4.9 Policy NE1 – The Natural Environment A. The Council will conserve and enhance Camden's natural environment. The Council will:

i. Protect and enhance the network of open spaces and local green spaces across the borough in accordance with Policy SC3 Open Space;

ii. Give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL);

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;

iv. Support communities seeking the designation of Local Green Spaces through the neighbourhood planning process;

v. Protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible;

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;

ix. Protect trees in Camden and seek to secure additional trees in accordance with Policy NE3 Tree Planting and Protection; 306 // // Draft Camden Local Plan 2024

x. Secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;

[7] Adopted Camden Local Plan (2017)
https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6

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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.

2.4.10 Policy NE2 - Biodiversity A. The Council will seek to ensure that development protects and enhances nature conservation and biodiversity in the Borough. The Council will:

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;

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.

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2.4.11 Policy NE3 – Tree Planting and Protection A. The Council will seek to protect existing trees and secure additional tree planting in the borough. The Council will:

i. resist the loss of a tree, group of trees, area of woodland and/or vegetation of significant amenity, historic, cultural, and/or ecological value on, or adjacent to, a development site. The Council will also resist proposals which may threaten the continued wellbeing of such trees as specified above;

ii. make Tree Preservation Orders (TPO's) when necessary to protect specific trees, groups of trees, or woodlands, in the interests of amenity and biodiversity;

iii. ensure that where trees are to be retained on developments, these are positively integrated into the design and layout of the proposed scheme;

iv. require trees and vegetation, that are to be retained, to be satisfactorily protected both during and following the demolition and construction phase of development, in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction';

v. require replacement trees and/or vegetation to be provided where the loss or harm to the wellbeing of significant trees and/or vegetation has been justified in the context of the proposed development;

vi. prioritise securing replacement trees and vegetation on-site. Where it can be demonstrated to the Council's satisfaction that replacement trees and vegetation cannot be provided on-site, a financial contribution will be secured to enable the planting and subsequent maintenance of replacement trees and vegetation off-site;

vii. require developments to incorporate additional trees and vegetation wherever possible, as part of a detailed landscaping scheme for the site. A detailed landscaping scheme and landscape management plan must be submitted for all major developments, including, but not limited to, details of the trees and vegetation to be planted, and proposals for how the landscaping scheme will be managed and maintained over the lifetime of the development.

2.5 Proposed Development

2.5.1 If the location is deemed to be viable for development, the Applicant is seeking to of the existing Norman Collins building with a new proposed Centre for Performance Technology and Equity (PTEQ) ('the site').

2.6 Quality Assurance

2.6.1 All Assystem ecologists are members of (at the appropriate level) CIEEM and follow their code of professional conduct when undertaking ecological work.

2.6.2 Assystem are a CIEEM Registered Practice, and as such champion high professional standards whilst delivering the best outcomes for biodiversity and supporting a thriving economy.

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3. Methodology

3.1 Zone of Influence

3.1.1 The Zone of Influence (ZoI) is the area over which the ecological features identified may be subject to significant effects because of the Proposed Development. These will vary between ecological receptors.

3.2 Study Area and Survey Area

3.2.1 The PEA considers the presence of potential receptors across two geographical areas, the study area and the survey area. The study area comprises an area of 1 km from the site boundary in which the presence of biodiversity features, including designated sites, notable habitats and records of protected species are identified to help consider potential impacts on features beyond the site boundary but also to provide context to the biodiversity potential for the site. Due to the site's location within a heavily urban area and lack of ecological connectivity to the site, 1 km was deemed an appropriate distance for the data search, however due to the more sensitive nature of nationally and internationally designated sites the study area for these has been extended, as discussed in Section 4.3, for identification of potential receptors.

3.2.2 The land incorporated within and immediately adjacent to the Site, as identified by the Red Line Boundary for planning, comprises the survey area and was subject to field survey as discussed in Section 4.4 to consider the presence of biodiversity features that could be impacted by development of the Site.

3.3 Desk Study

3.3.1 An ecological desk study was undertaken to determine the presence of any designated sites for nature conservation, habitats of conservation importance and protected and notable species that occur within 1 km of the site. Due to the site's location within a heavily urban area and lack of ecological connectivity to the site, 1 km was deemed an appropriate distance for the data search. Further data was obtained from Greenspace information for Greater London (GiGL) and the Multi-Agency Geographic Information for the Countryside (MAGIC) website.

3.3.2 Only records from within the last ten years and considered relevant to the site have been included in this report.

Table 1 Sources of Desk Study Records

Source	Information Requested
Greenspace information for Greater London (GiGL)	Protected and priority species (1 km) Sites of local importance (1 km) i.e. Ramsar Sites, Special Protection Areas (SPAs), Special Areas of Conservation (SACs)
Multi-Agency Geographic Information for the Countryside	International statutory sites (10 km) National statutory sites (5 km), i.e. SSSIs Other statutory sites (2 km), i.e. National Nature Reserves (NNR), Local Nature Reserves (LNR), Local Wildlife Sites (LWS) European Protected Species Development Licenses (1 km)

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3.3.3 The search buffers listed in Table 1 are sufficient to cover the potential ZoI of the Proposed Development. For protected and priority species, and sites of local importance, the impacts of the Proposed Development were not expected to exceed 1 km, due to the urban setting of the site and lack of ecological connectivity.

3.3.4 For internationally designated sites the search buffer was extended to 10 km, with a search buffer of 5 km for nationally designated sites such as SSSIs and 2 km for other designated sites (e.g. NNR and LNR).

3.3.5 Impact Risk Zones (IRZs) are a tool developed by Natural England to help assess the potential risks to nationally or internationally designated sites posed by development proposals. IRZs for this report were located using magic.defra.gov.uk, and reviewed against the Proposed Development proposals to understand if the Local Planning Authority would need pre-application advice from Natural England.

3.4 Field Survey

3.4.1 A field survey in the form of an 'extended' UK Habitat Classification survey was undertaken by Dominic Martens, an ecologist with two and half years' experience, and Poppy Anson, and ecologist with over a years' experience, on 16th August 2024.

3.4.2 All habitats within the survey area were identified and mapped in compliance with the UK Habitat Classification[8]. The UK Habitat Classification is hierarchical, with the professional edition used for the assessment and all habitats taken to Level 4 wherever possible. Considering the scale of the proposals, the fine-scale Minimum Mapping Unit (MMU) of 25 m^2 for area-based habitats and 5 m length for linear features has been used. Linear features, such as lines of trees that are at least 1 m in width, are recorded as area features at the fine-scale mapping resolution.

3.4.3 All habitats within the field survey area have been attributed appropriate secondary codes, which are designed to provide additional information on the presence of features and management of the habitat. Essential secondary codes have been considered for the habitats present, and the additional secondary codes have been considered where relevant.

3.4.4 The dominant plant species were recorded, and any protected, uncommon or invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were noted.

3.4.5 Consideration was given to the potential for the Site to support Priority Habitats and Priority Species, as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006).

3.4.6 The protected species and Priority Habitats considered relevant to the assessment, based on geographical region and the presence of suitable habitats within the site, were as follows:

- Bats - assessment of trees and buildings for their potential to support roosting bats;
- Reptiles - assessment of habitats to identify suitability for reptiles;

[8] UK Hab Ltd (2023) UK Habitat Classification Version 2.0 (at https://www.ukhab.org)

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- Nesting birds (including Schedule 1) - assessment of habitat for their suitability for nesting birds; and
- Invertebrates.

3.5 Assessment and Evaluation

3.5.1 This PEA has been produced in broad accordance with CIEEM's Guidelines for Preliminary Ecological Appraisal[9] and Guidelines for Ecological Report Writing[10].

3.5.2 Where relevant and appropriate, the evaluation of ecological features and the potential ecological impacts of the proposals have followed CIEEM's Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine[11].

3.5.3 The level of value of specific ecological receptors is assigned using a geographic frame of reference, with international, national, regional, county (metropolitan), district, local and site only value in descending order.

3.5.4 A negligible value is assigned where the habitat offers minimal value to wildlife, or the presence of a particular species is detrimental to wider biodiversity (*i.e*. invasive species). Where best practice guidelines are unavailable or unclear, experienced ecologists have used their judgement to assess and categorise the suitability of habitats for protected and/or notable species, refer to Table 2.

Table 2 Scale of Constraints

Likelihood	Definition
High	An actual or potential constraint that is subject to relevant legal protection and is likely to be a material consideration in determining the planning application (e.g., statutory nature conservation designations and European/nationally protected species). Further survey likely to be required (as detailed in this report) to support a planning application.
Moderate	An actual or potential constraint that is covered by national or local planning policy and depending on the level of the potential impact because of the Proposed Development may be a material consideration in determining the planning application. Further survey may be required to support a planning application
Low	Unlikely to be a constraint to the Proposed Development or require further survey prior to submission of a planning application. Mitigation is likely to be covered under Construction Environmental Management Plan (CEMP) or Precautionary Working Method Statement (PWMS) (e.g., generic requirements for the management of nesting bird risks).

[9] CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.

[10] CIEEM (2017) Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.

[11] CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

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3.5.5 The need and scope for additional species surveys has been determined based on the suitability of the habitats for protected and/or notable species, the potential impacts of the Proposed Development and the nature of the legal protection afforded to the species likely to be present.

3.5.6 Value judgements are based on various characteristics that can be used to identify ecological resources or features likely to be important in terms of biodiversity. These include site designations (such as Sites of Special Scientific Interest), or for undesignated features the size, conservation status (locally, nationally or internationally), and the quality of the ecological resource. In terms of the latter, 'quality' can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

3.6 Limitations

3.6.1 Biological records can be received from a wide variety of sources and may or may not be comprehensive and accurate. However, if assessed in conjunction with a UK Habitat Classification Survey, they can contribute to a robust ecological assessment of a site.

3.6.2 The desk study and field survey will not produce a comprehensive list of plants and animals as this will be limited by factors that influence their presence (e.g. activity and dormancy periods). An assessment can however be made of the habitats within the survey area, their nature conservation value, and potential to support protected or priority species.

3.6.3 Despite the limitations described, there are deemed to be no significant limitations to this PEA.

4. Results

4.1 Desk Study

Statutory Designated Sites

4.1.1 A desk-based search shows that there is one Special Protection Area (SPA) and Ramsar Site within 10 km of the site (Lee Valley), one SSSI and one NNR within 5 km and three LNRs within 2 km. The nearest statutory designated site is Adelaide LNR which lies 850 m east of the site. These are detailed in Table 3 and identified in Figures 2 and 3.

Table 3 Statutory Designated Sites within the Study Area

Site Name & Number	Principal Feature(s)	Distance and Direction from Site
Internationally Designated Sites		
Lee Valley SPA	Comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats that support wintering wildfowl. Designated under Article 4.1 as over winter the area regularly supports a significant proportion of the Great Britain population of bittern (*Botaurus stellaris*).	8,560 m NE

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	Designated under Article 4.2, as over winter the area regularly supports a significant proportion of the Great Britain population of shoveler (*Anas clypeata*) and gadwall (*Anas strepera*). In addition, the site supports nationally important numbers of cormorant (*Phalacrocorax carbo*), great crested grebe (*Podiceps cristatus*), tufted duck (*Aythya fuligula*), pochard (*Aythya farina*) and grey heron (*Ardea cinerea*).	
Lee Valley Ramsar	Comprises a series of reservoirs, lagoons, wetlands and valley bottom habitats that support wintering wildfowl. Designated under Ramsar Criterion 2, as the site supports the nationally scarce plant species whorled water-milfoil (*Myriophyllum verticillatum*) and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman). Designated under Ramsar Criterion 6, as the site supports northern and gadwall at levels of international importance.	8,560 m NE

National Statutory Sites

Hampstead Heath Woods SSSI	Long established high forest woodland with abundant old and over-mature trees providing deadwood habitat for a range of invertebrate species. Also includes an adjacent small valley containing an acidic flush with developing bog-moss communities. Supports stands of acid sessile oak-beech woodland, an uncommon stand-type in Greater London. The shrub layer is dominated by holly (*Ilex aquifolium*) with rowan (*Sorbus aucuparia*), hazel (*Corylus avellana*), and the locally abundant introduced shrubs rhododendron (*Rhododendron ponticum*) and cherry laurel (*Prunus laurocerasus*). Ground flora is dominated by bramble (Rubus fruticosus) and bracken (*Pteridium aquilinum*). Other species recorded include bluebell (*Hyacinthoides non-scripta*) and species indicating long-established woodland such as wood anemone (*Anemone nemorosa*) and pignut (*Conopodium majus*). Several beetle's dependent on dead wood have been recorded here, including the nationally rare jewel beetle (*Agrilus pannonicus*) whose larvae develop in and under the bark of oak. This species is rare in Britain and is listed as vulnerable in the British Red Data Book.	2,380 m N

Local Nature Reserves

Adelaide	The reserve has a summer meadow, pond, areas of scrub and small woodland. The grassland areas feature red fescue (*Festuca rubra*), false oat-grass (*Arrhenatherum elatius*), common couch (*Elymus repens*) and bents (*Agrostis* spp.) intermingled with black medick (*Medicago lupulina*), oxeye daisy (*Leucanthemum vulgare*), red and white clovers (*Trifolium pratense* and *T. repens* respectively) and creeping cinquefoil (*Potentilla reptans*). Late flowering, insect-attracting species such as Canadian goldenrod (*Solidago canadensis*), Michaelmas-daisy (*Aster* sp.) and rosebay willowherb (*Chamaenerion angustifolium*) are also present. The wooded parts of the reserve are covered in ash (Fraxinus excelsior) and oak (*Quercus* sp.) with an understorey of young oak, hawthorn (*Crataegus monogyna*) and hazel (*Corylus avellana*). The pond supports a range of planted wildflowers including yellow iris (*Iris pseudacorus*), meadowsweet (*Filipendula ulmaria*), ragged robin (*Silene flos-cuculi*) and mare's-tail (*Hippuris vulgaris*).	850 m E
Belsize Wood	Divided into three fenced off areas. The central section is poorly vegetated at ground level with ivy (*Hedera helix*) dominating due to trampling. The northern area's understorey comprises tall hawthorn and elder (*Sambucus nigra*), with regenerating ash, field maple (*Acer campestre*) and wild cherry (*Prunus avium*). Bramble dominates the ground with herbs of greater willowherb (*Epilobium hirsutum*), enchanter's nightshade (*Circaea lutetiana*) and bittersweet (*Solanum dulcamara*). Ash, sycamore (*Acer pseudoplatanus*), wild cherry, field maple, oak, and	1,125 m NE

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	common lime (*Tilia* x *europaea*) are the most common canopy with a large Swedish whitebeam (*Sorbus intermedia*) prominent in the central area. The southern section's understorey comprises hazel, English elm (*Ulmus procera*) and dogwood (*Cornus sanguinea*) with shade tolerant herbs such as wood avens (*Geum urbanum*), enchanter's nightshade, cow parsley (*Anthriscus sylvestris*) and tutsan (*Hypericum androsaemum*) in the ground flora. A small pond supports yellow iris and marsh marigold (*Caltha palustris*) on the margins, with the floating aquatic species lesser duckweed (*Lemna minor*) and water-starwort (*Callitriche stagnalis*). The site regularly hosts numbers of birds such as great tit (*Parus major*), blue tit (*Cyanistes caeruleus*), long-tailed tit (*Aegithalos caudatus*), wren (*Troglodytes troglodytes*), robin (*Erithacus rubecula*), great spotted woodpecker (*Dendrocopos major*), blackbird (*Turdus merula*) and song thrush (*Turdus philomelos*).	
St John's Wood Church Grounds	Developed on the site of a former burial ground. A wildlife area in the east contains a mixture of meadow and woodland habitats, with associated communities of tall grasses and herbs. In open sunny areas creeping thistle (*Cirsium arvense*) tends to dominate, with meadow buttercup (*Ranunculus acris*) also frequent. In areas of dappled light cow parsley becomes dominant, with meadow buttercup, occasional red campion (*Silene dioica*) and ground ivy (*Glechoma hederacea*). In the shadiest north-east corner common nettle (*Urtica dioica*) becomes dominant, with cow parsley, green alkanet (*Pentaglottis sempervirens*) and occasional wood avens. In shady spots, the locally uncommon grey sedge (*Carex divulsa*) occurs. Most of the trees from the original graveyard have been left in place including several pedunculate oaks (*Quercus robur*), an evergreen oak (*Q. ilex*) and London planes (*Platanus x hispanica*). A hedge of native species, including hazel, blackthorn (*Prunus spinosa*) and field maple, has been planted along part of the eastern boundary. Flowering species include lavender (*Lavandula* sp.), buddleia (*Buddleja davidii*), hedge-veronica (*Hebe* sp.), stonecrops (*Sedum* spp.), betony (*Stachys officinalis*), common vetch (*Vicia sativa*) and bugle (*Ajuga reptans*). Blackbird, robin, wren, blue tit, dunnock (*Prunella modularis*) and woodpigeon (*Columba palumbus*) regularly nest in or around the site, with song thrush occasionally nesting. The tall grass community provides good autumn feeding habitat for seed-eating birds, with goldfinch (*Carduelis carduelis*) regularly recorded.	1,360 m S

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Figure 2 **Statutory Designated Sites within the Study Area** (Contains public sector information licensed under the Open Government Licence v3.0 and map data from © OpenStreetMap)

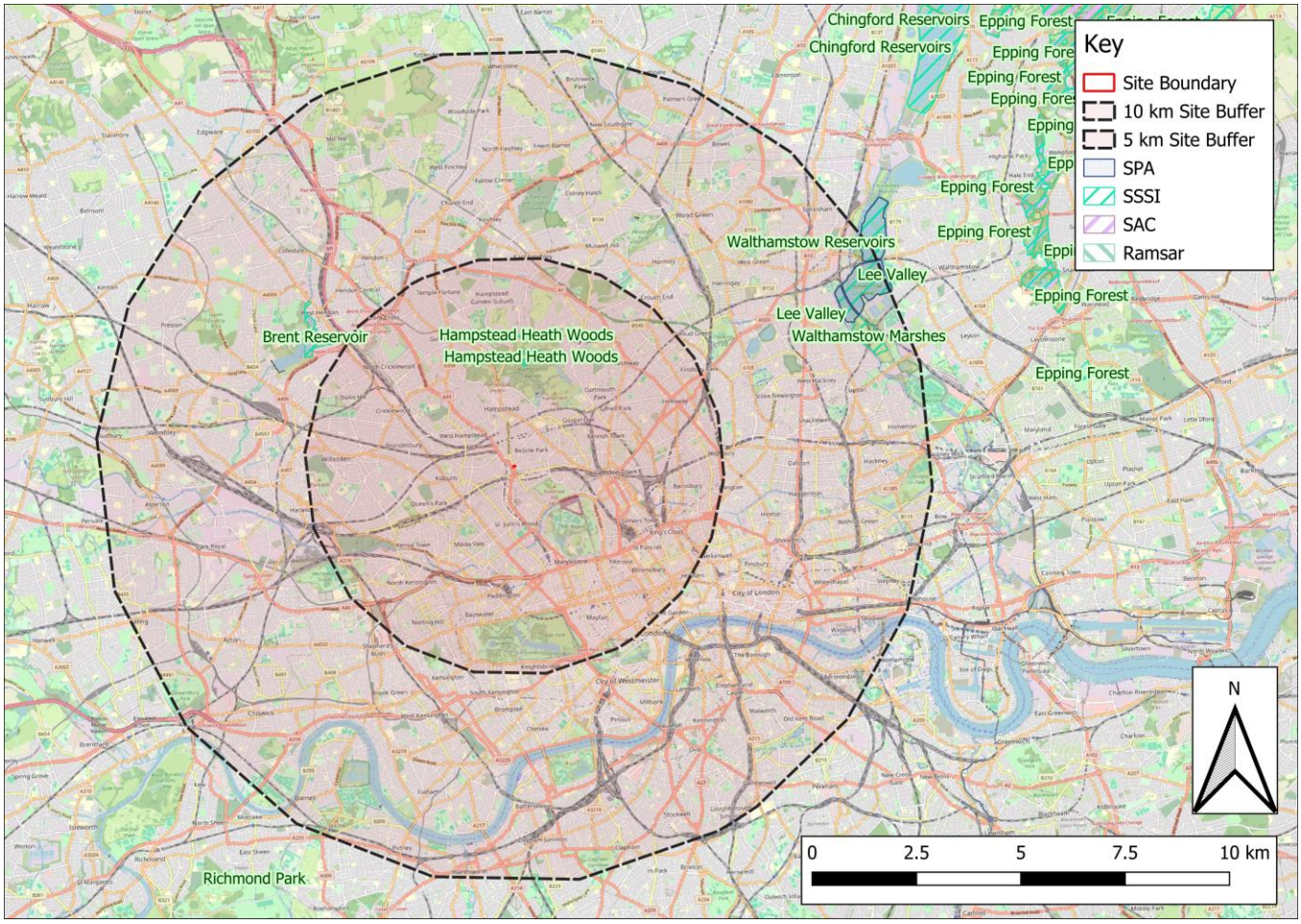

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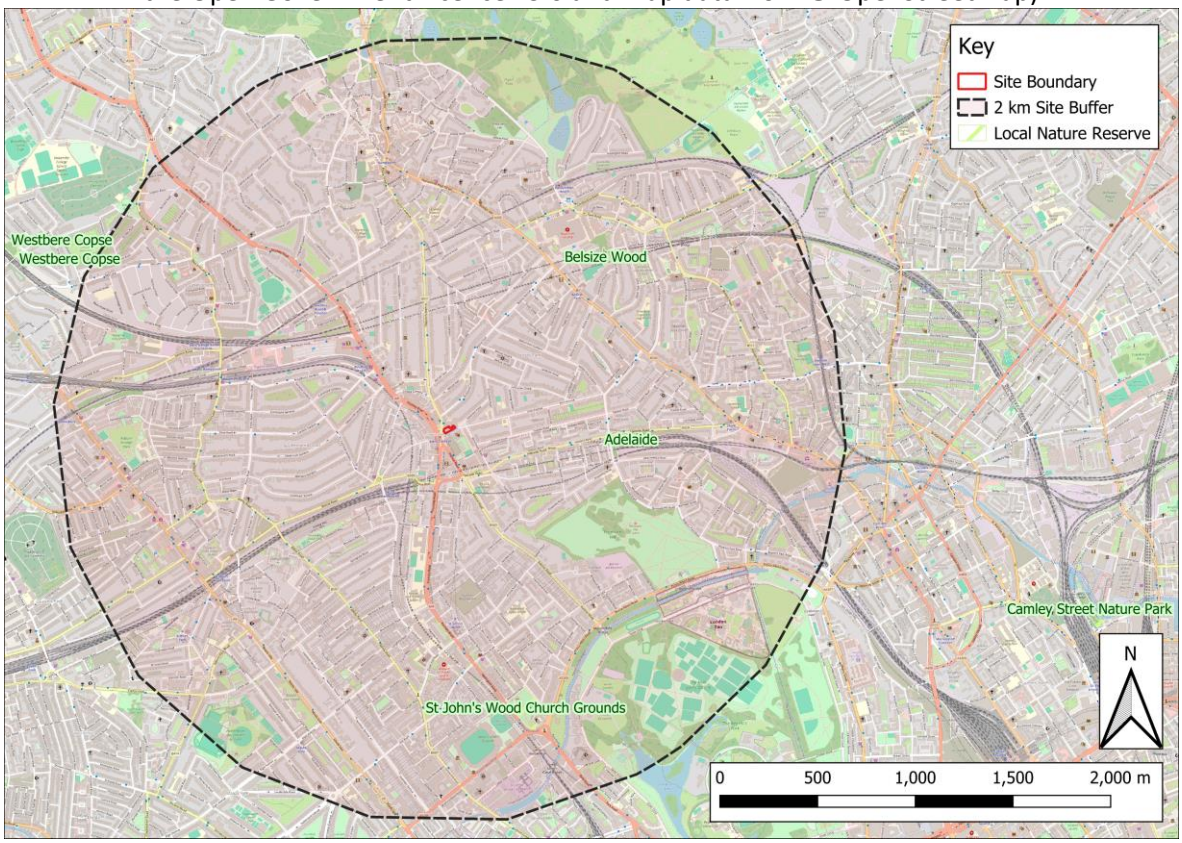
Figure 3 **Local Nature Reserves within the Study Area** (Contains public sector information licensed under the Open Government Licence v3.0 and map data from © OpenStreetMap)



4.1.2 The site is in the Impact Risk Zone for Hampstead Heath Woods SSSI. The Natural England website[12] has been consulted; the proposed development does not match any of the listed descriptions (aviation infrastructure; minerals, oil and gas; air pollution; combustion) that would require consultation with Natural England. The Proposed Development is unlikely to have a harmful effect on terrestrial SSSIs.

Non-Statutory Designated Sites

4.1.3 The desk-based search identified six Sites of Importance for Nature Conservation (SINCs) within the study area. Table 4 shows the non-statutory designated sites within 1 km of the Site, and Figure 3 identifies their locations.

[12] Natural England (2024) Impact Risk Zones for Sites of Special Scientific Interest. Available at: http://irz.geodata.org.uk/IRZ/step2.html?irzcode=0301000530000&notes=&location=529489,185661%20(IRZ%20polygon%20centre) Accessed 21/08/2024.

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Table 4 Non-Statutory Designated Sites within the Study Area

Site Name & Number	Principal Feature(s)	Distance and Direction from Site
Borough Grade I		
CaBI05 Chalk Farm Embankment and Adelaide Local Nature Reserve	Steep sided railway embankment densely vegetated with secondary woodland. Species include sycamore, horse-chestnut (*Aesculus hippocastanum*), lime (*Tilia* sp.), holm oak (*Quercus ilex*), laburnum (*Laburnum anagyroides*), elder and hawthorn. Ground flora is dominated by ivy and bramble with false-oat grass towards the edges. The nature reserve is more open with semi-improved neutral grassland, scrub, woodland and a pond. Grassland species include red fescue, false oat-grass, common couch and bents.	830 m E
CaBI06 West Hampstead Railsides, Medley Orchard and Westbere Copse Local Nature Reserve	Railsides are a complex of habitats with extensive areas dominated by secondary woodland and scrub. Trees include sycamore, grey poplar (*Populus* x *canescens*), wild cherry, ash and horse chestnut. Scrub species include elder, dogwood, bramble, hawthorn and English elm. Herb species in grassland areas include cow parsley, green alkanet, bittersweet, white dead nettle (*Lamium album*) and garlic mustard (*Alliaria petiolata*). Westbere Copse comprises sycamore, oak, ash and aspen (*Populus tremula*) with an understorey of snowberry (*Symphoricarpos rivularis*), elder, English elm, blackthorn and hawthorn. In less shaded areas common toadflax (*Linaria vulgaris*), Canadian goldenrod and Michaelmas-daisy grow. The London notable species common broomrape (*Orobanche minor*) has been recorded here. There is also a small pond and spring and summer wildflower meadows. The Medley Orchard is an old orchard, a rare habitat in London. Although it is now largely a secondary woodland, the remaining fruit trees support important communities of invertebrates.	690 m NW
Borough Grade II		
CaBII02 Broadhurst Garden Meadow	Communal garden consisting of a meadow with varying grass heights and trees and shrubs around the perimeter. The grassland sward comprises creeping bent (*Agrostis stolonifera*), timothy (*Phleum* sp.), meadow foxtail (*Alopecurus pratensis*), red fescue, false oat-grass, Yorkshire fog (*Holcus lanatus*) and cock's-foot (*Dactylis glomerata*). Wildflower species include meadow vetchling (*Lathyrus pratensis*), yarrow (*Achillea millefolium*), cat's-ear (*Hypochaeris radicata*), common sorrel (*Rumex acetosa*), lesser stitchwort (*Stellaria graminea*) and various buttercups (*Ranunculus* spp.). The site supports numerous insect species including butterflies, beetles, hoverflies and grasshoppers.	765 m NW
CaBII03 Frognal Court Wood	Dense woodland comprising sycamore, ash, very large hybrid black poplars (*Populus* x *canadensis*), wild cherry, and common lime. Understorey shrubs include elder, holly, Highclere holly (*Ilex* x *altaclarensis*), garden privet (*Lingustrum ovalifolium*), dog rose (*Rosa canina*) and yew (*Taxus baccata*). The wood supports numerous bird species .	630 m NW
CaBII05 Primrose Hill	Area of Regent's Park consisting predominantly of mown amenity grassland with scattered groups of mature trees. Grassland beneath the trees is mown less frequently and supports a mix of wildflowers including cat's-ear, common vetch, and cow parsley.	680 m SE

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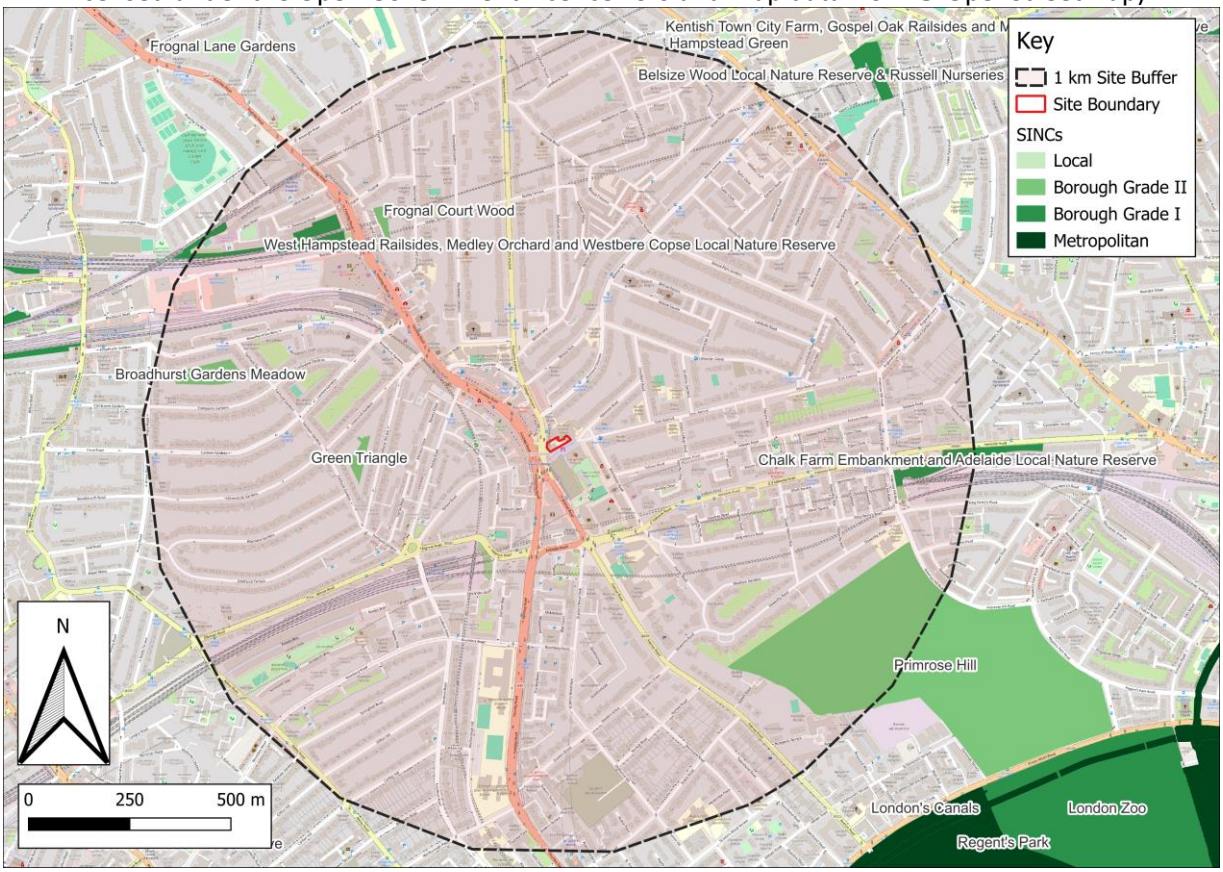
Site Name & Number	Principal Feature(s)	Distance and Direction from Site
	The trees are mostly London plane but common lime, hawthorn, horse chestnut and whitebeam are also present. Hedges of hawthorn and field maple are present.	
CaBII08 Green Triangle	Community garden with trees forming a high canopy including sessile oak (*Quercus petraea*), sycamore, ash, yew, silver birch (*Betula pendula*), rowan and field maple. The understorey supports exotic and native shrubs and young trees including elder, hazel, guelder rose (*Viburnum lantana*), Portugal laurel (*Prunus lusitanica*), Oregon grape (*Mahonia aquifolium*) and magnolia (*Magnolia* sp.). The herb layer contains a variety of species attractive to invertebrates and deadwood provides valuable invertebrate habitat. The London notable species hemp-agrimony (*Eupatorium cannabinum*) grows in less shaded areas.	445 m W

Figure 4 **Non-Statutory Designated Sites within the Study Area** (Contains public sector information licensed under the Open Government Licence v3.0 and map data from © OpenStreetMap)



Priority Habitats

4.1.4 Priority habitats include those listed in Section 41 of the Natural Environment and Rural Communities Act (2006) habitats of principal importance as well as those listed in the London Priority Species List (LPSL). The priority habitats within 1 km of the Site are identified in Figure 4 and comprise 21 sites of Priority

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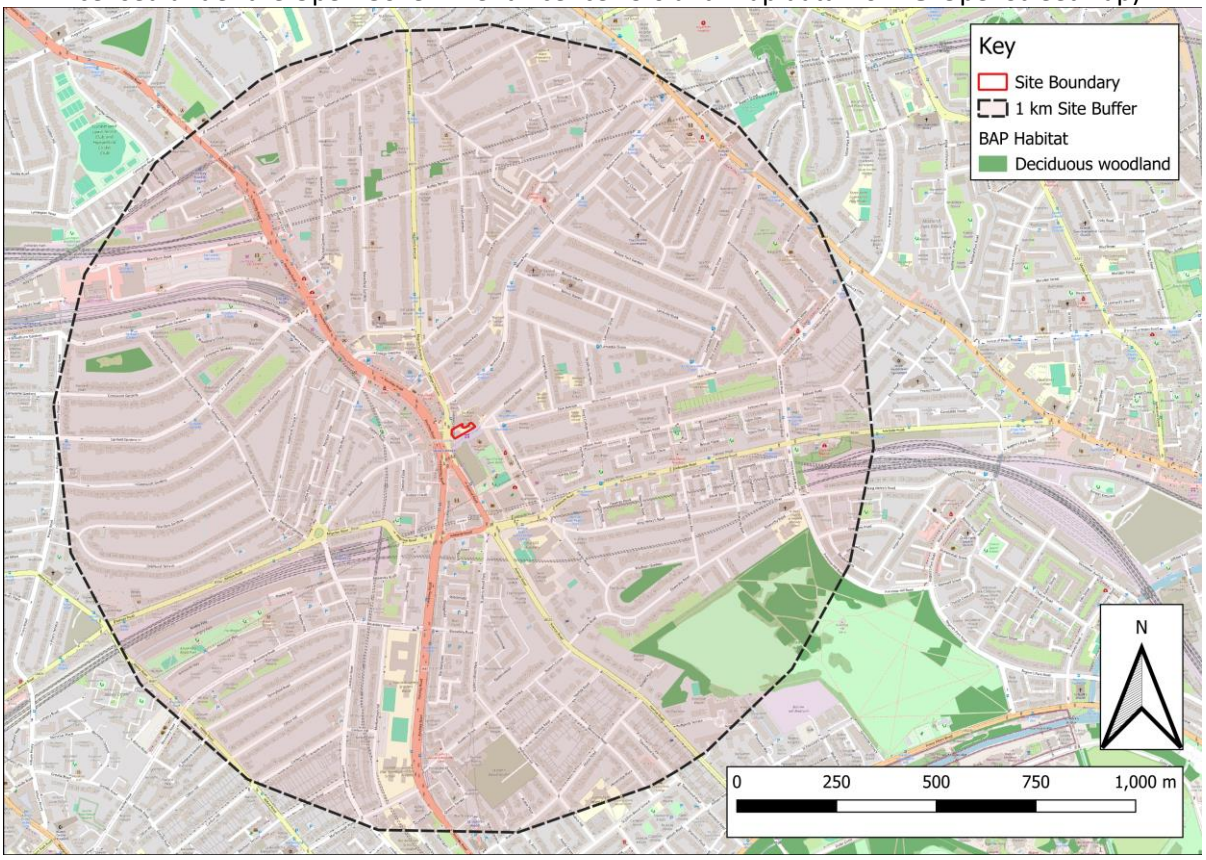
Habitat Deciduous Woodland and 14 broadleaved woodland sites listed on the National Forest Inventory (GB).

Figure 5 Biodiversity Action Plan Habitats within Study Area (Contains public sector information licensed under the Open Government Licence v3.0 and map data from © OpenStreetMap)



Protected and/or Notable Species Records

4.1.5 The MAGIC website showed that there are four records of previous applications for European Protected Species (EPS) development licences within 1 km of the survey area. These were for the destruction of common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*) resting places. The most recent of these ended in May 2024; the closest lies c. 700 m north-west of the site.

4.1.6 Records of protected and/or notable species have been obtained from the GiGL report, which are summarised in Table 5. Only those records considered potentially relevant to the Site, and habitats present or likely to be present, have been included.

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Table 5 Protected and Notable Species Records from GiGL

Species	Scientific Name	Number of Records	Date of Most Recent Record	Distance of Nearest Record from Site
Birds				
Lesser redpoll	*Acanthis cabaret*	19	01/12/2019	362 m W
Skylark	*Alauda arvensis*	19	08/11/2019	1000 m SE
Tree pipit	*Anthus trivialis*	11	27/08/2019	1048 m SE
Swift	*Apus apus*	103	29/07/2020	44 m E
Greenfinch	*Chloris chloris*	44	25/12/2019	653 m W
Cuckoo	*Cuculus canorus*	1	08/04/2017	1048 m SE
House martin	*Delichon urbicum*	80	22/10/2019	367 m E
Yellowhammer	*Emberiza citrinella*	1	17/10/2019	1048 m SE
Reed bunting	*Emberiza schoeniclus*	8	08/11/2019	1048 m SE
Merlin	*Falco columbarius*	1	15/04/2015	1048 m SE
Brambling	*Fringilla montifringilla*	8	25/10/2019	1048 m SE
Herring gull	*Larus argentatus*	36	30/10/2019	98 m NE
Linnet	*Linaria cannabina*	53	25/12/2019	1048 m SE
Red kite	*Milvus milvus*	7	26/08/2019	683 m E
Grey Wagtail	*Motacilla cinerea*	44	28/10/2019	136 m SE
Yellow Wagtail	*Motacilla flava*	14	08/10/2019	1048 m SE
Osprey	*Pandion haliaetus*	3	25/10/2015	595 m NE
Dunnock	*Prunella modularis*	10	05/01/2019	641 m W
Whinchat	*Saxicola rubetra*	5	26/08/2019	1048 m SE
Woodcock	*Scolopax rusticola*	4	17/03/2017	1048 m SE
Tawny owl	*Strix aluco*	82	21/03/2022	47 m SW
Starling	*Sturnus vulgaris*	37	06/11/2019	1048 m SE
Redwing	*Turdus iliacus*	76	25/12/2019	63 m E
Song thrush	*Turdus philomelos*	24	25/12/2019	469 m SW
Fieldfare	*Turdus pilaris*	35	11/12/2019	923 m S
Mistle thrush	*Turdus viscivorus*	24	15/10/2019	469 m SW
Woodlark	*Lullula arborea*	2	29/10/2019	Within search area
Dartford warbler	*Curruca undata*	1	12/03/2019	Within search area
Hawfinch	*Coccothraustes coccothraustes*	6	03/11/2019	Within search area
Mammals				
Bat	*Vespertilionidae*	25	06/05/2020	260 m E
Nyctalus Bat species	*Nyctalus*	6	22/07/2017	965 m E
Noctule Bat	*Nyctalus noctula*	10	31/07/2020	809 m NW

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Species	Scientific Name	Number of Records	Date of Most Recent Record	Distance of Nearest Record from Site
Pipistrelle Bat species	*Pipistrellus*	29	24/07/2017	224 m E
Nathusius's Pipistrelle	*Pipistrellus nathusii*	3	29/07/2020	809 m NW
Common Pipistrelle	*Pipistrellus pipistrellus*	68	31/07/2020	476 m W
Soprano Pipistrelle	*Pipistrellus pygmaeus*	40	31/07/2020	546 m S
Eurasian badger	*Meles meles*	2	20/09/2020	Within search area
Amphibians and Reptiles				
Common frog	*Rana temporaria*	32	24/05/2015	286 m SE
Invertebrates				
Silky gallows-spider	*Phycosoma inornatum*	1	06/09/2021	841 m SE
Common darter	*Sympetrum striolatum*	1	27/08/2022	840 m E
A true bug	*Pediopsis tiliae*	2	26/06/2021	957 m SE
A beetle	*Anthribus fasciatus*	2	26/07/2021	957 m SE
Stag beetle	*Lucanus cervus*	12	14/06/2020	281 m N
A beetle	*Polydrusus formosus*	4	28/05/2021	841 m SE
A butterfly	*Lycaena phlaeas eleus*	1	21/06/2019	581 m NW
Essex skipper	*Thymelicus lineola*	1	26/07/2021	841 m SE
Jersey tiger	*Euplagia quadripunctaria*	2	17/07/2022	767 m NE
Picture-winged fly	*Dorycera graminum*	1	28/05/2021	841 m SE
Brown tree ant	*Lasius brunneus*	2	27/04/2021	841 m SE
Plants				
Juniper	*Juniperus communis*	1	14/03/2023	847 m E
Corn marigold	*Glebionis segetum*	1	30/04/2016	959 m E
Large-leaved lime	*Tilia platyphyllos*	32	29/07/2022	219 m S
Invasive Species				
Ring-necked Parakeet	*Psittacula krameri*	7	08/02/98-17/06/19	1000 m SE
Tree-of-heaven	*Ailanthus altissima*	8	18/07/03-01/08/18	1048 m SE
Butterfly-bush	*Buddleja davidii*	13	18/07/95-24/02/18	340 m SE
Franchet's Cotoneaster	*Cotoneaster franchetii*	1	30/04/2016	880 m E
Tree Cotoneaster	*Cotoneaster frigidus*	1	04/05/2018	925 m N

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Species	Scientific Name	Number of Records	Date of Most Recent Record	Distance of Nearest Record from Site
Japanese Knotweed	*Fallopia japonica*	9	18/07/95-24/05/19	1080 m W
Goat's-rue	*Galega officinalis*	4	03/07/95-30/04/16	760 m S
A Flowering Plant	*Lamiastrum galeobdolon subsp. argentatum*	1	30/04/2016	880 m E
Green Alkanet	*Pentaglottis sempervirens*	7	28/08/03-24/02/18	340 m SE
Turkey Oak	*Quercus cerris*	10	27/09/07-30/04/16	890 m SE
Evergreen Oak	*Quercus ilex*	10	18/07/03-30/04/16	340 m SE
False-acacia	*Robinia pseudoacacia*	22	21/08/03-01/01/20	110 m SE

Biodiversity Hotspots for Planning

4.1.7 The GiGL Biodiversity Hotspots for Planning dataset[13] provides indicative areas of biodiversity hotspots in Greater London, based on the Greater London Authority's (GLA's) Planning for Biodiversity report. 'Hotspot' areas in the dataset indicate the presence of sensitive biodiversity that could potentially be affected by development. The dataset scores 'tiles' between 0 and 3, where 0 indicates no currently known protected species, sites or habitat impact areas in the area and 3 indicates the presence of all three categories. Scores of 1 or 2 identify the presence of the corresponding number of categories but does not specify which are present.

4.1.8 The site has been identified to have a score of '1', which indicates that there one known protected habitat, site or species within this area, as identified in Figure 5.

[13] Greenspace Information for Greater London (2019) Biodiversity Hotspots for Planning. Dataset created 2019, last updated November 2022.

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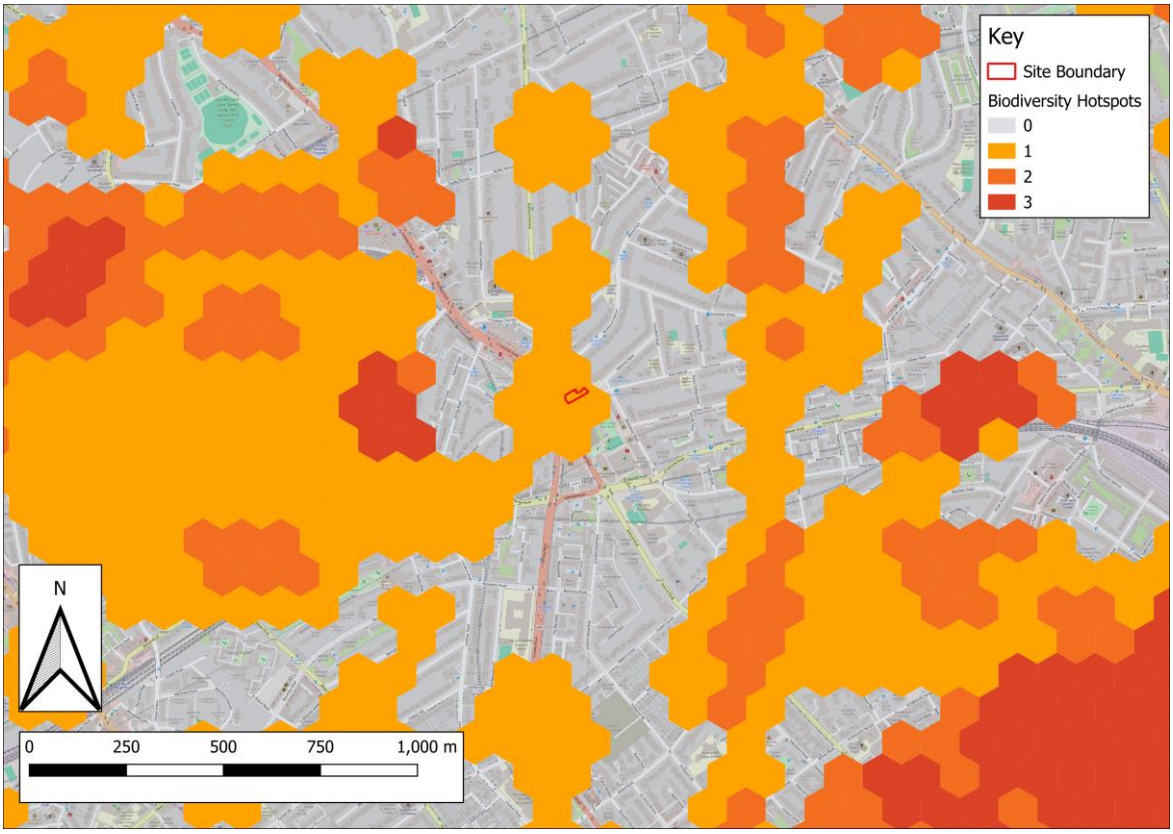
Figure 6 **Biodiversity Hotspots relative to the Application Site** (Map displays GiGL data, November 2022, and contains Ordnance Survey data © Crown copyright and database right 2023)



4.2 Habitat Survey

4.2.1 The results of the habitat survey are presented below, with the weather conditions at the time of the survey presented in Table 6. Table 7 provides a summary of the habitat types recorded on site, and the frequency and distribution of habitat types is displayed within a UKHab Survey Map (Appendix A). This map illustrates the location and extent of the different habitat types recorded within the survey area at the Proposed Development Site.

Table 6 **Weather Conditions During Survey**

Parameter	Survey 1 (Preliminary Ecological Appraisal)
Date(s)	16/08/2024
Start Time and Finish Time	9:50
Temperature (°C)	10:50
Cloud Cover (%)	20
Wind (Beaufort Scale)	3
Precipitation	0

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Table 7 Habitat Table and Condition Assessment

Habitat Type	Photograph of Habitat	Habitat Condition
U1b5 – Buildings (Secondary Codes: 813 – Educational building)		
Two storey building, well-sealed with a flat felt roof. No potential roosting features.		N/A
U1b6 – Hardstanding		

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Habitat Type	Photograph of Habitat	Habitat Condition
The majority of the site was comprised of hardstanding providing access to the building on-site and also to adjacent buildings. The hardstanding was in good condition. The hardstanding provided amenities in the form of benches and picnic table for student to use across the site.		N/A

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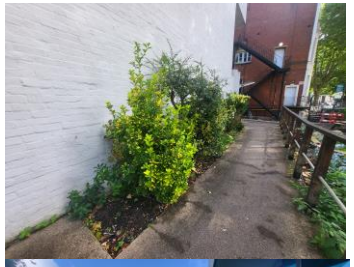
Habitat Type	Photograph of Habitat	Habitat Condition
U1b – Developed land, sealed surface (Secondary code: 845- Ground level planter) This site had four areas of planters, three in the grassland and one to the north of the grassland. Species in the planter to the north of the grassland included Japanese spindle tree *(Euonymus japonicus),* Darwin's barberry *(Berberis darwinii),* Mexican orange *(Choisya),* creeping woodsorrel *(Oxalis corniculate),* cyprus sp Regnum *(Cypri)* and cabbage *(Brassica oleracea var. capitata).* The three planters in the grassland were used for composting.	 	N/A
U1 – Built-up areas and gardens (Secondary Codes: 846 – Flower bed) This site has three areas of U1 on site. Species include Tree of heaven *(Ailanthus altissima)*, Japanese barberry *(Berberis thunbergia)*, stinking iris *(Iris foetidissima)*, Japanese acuba *(Aucuba japonica)*, silver birch *(Betula pendula)* and lavender *(Lavandula).*	 	N/A

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Habitat Type	Photograph of Habitat	Habitat Condition
G4 – Modified Grassland (Secondary Codes: 106 - Mown; 510 – Bare ground) This site has one area of grassland. The grassland had a short sword length and limited species including Dove's-foot-crane's-bill *(Geranium molle),* Common fleabane *(Pulicaria dysenterica)*, greater plantain *(Plantago major)*, annual meadow grass *(Poa annua)*, nettle (Urtica), creeping buttercup *(Ranunculus repens),* creeping thistle *(Cirsium arvense),* chicory (Cichorium intybus), clover sp. *(Trifolium)*, daisy *(Bellis perennis)*, perennial ryegrass *(Lolium perenne),* alfalfa *(Medicago sativa),* creeping woodsorrel *(Oxalis corniculate),* asparagus fern *(Asparagus setaceus)* and sow thistle. Compost bags were also on the grassland and large areas of bare ground.		Poor

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4.2.2 The Target Note numbers within the extended UK Habitat Classification map in Appendix A correspond to the following points of ecological interest within the Site:

- TN1 – Tree of heaven

5. Ecological Features

5.1.1 The presence of Ecological Features within the Zone of Influence of the Proposed Development, and an evaluation of their importance based on the findings of the Desk Study and habitat survey is provided in Table 9.

Table 8 Ecological Features and Rationale for Presence/Likely Absence from the Site

Feature	Likelihood of Occurrence	Rationale
Designated Sites		
Statutory Designated Sites	Absent (within site) Present (within search area)	The study area has there is one Special Protection Area (SPA) and Ramsar Site within 10 km of the site (Lee Valley), one SSSI and one NNR within 5 km and three LNRs within 2 km. The nearest statutory designated site is Adelaide LNR which lies 850 m east of the site. However, the designated site is not considered to be in the area of influence as there is limited connectivity between the site and the designated site, thereby restricting impact pathways.
Non-Statutory Designated Sites	Absent (within site) Present (within search area)	There are six Sites of Importance for Nature conservation (SINCs) within 1 km of the site. The nearest is Green triangle which is 445 meters to the west of the site. Given the scale of the Proposed Development, and the lack of likely impacts beyond the Site boundary (in line with a Construction Environmental Management Plan), nearby non statutory designated sites are sufficiently well separated so that no impacts on their designated features are anticipated because of the works.
Priority Habitats		
Deciduous woodland	Absent (within site) Present (within search area)	The nearest priority habitat is associated with Wadham Gardens 580 meters south east of the site.

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		There is limited ecological connectivity between the site and priority habitats within the search area; it is considered that nearby priority habitats are sufficiently well separated so that no impacts are expected as a result of the Proposed Development
Birds		
Nesting Birds (Non-Schedule 1)	Absent (within site)	The site could support local assemblages of birds which might use the buildings, flat roofs and trees to nest within.
Nesting Birds (Schedule 1)	Absent (within site)	Some instances of Schedule 1 birds were recorded during the desk study. However, the Site offers limited suitable habitat for nesting Schedule 1 birds on-Site.
Mammals		
Bats - roosting	Absent (within site)	Given the lack of suitable habitat within the site the highly urban context of the location and no suitable roosting features, it is unlikely that the Site supports roosting bats.
Bats – foraging/commuting	Absent (within site)	Given the lack of suitable habitat within the site and the highly urban context of the location, it is unlikely that the Site supports foraging or commuting bats.
Invertebrates		
Notable species	Likely absent (within site)	No suitable habitat was recorded within the site that would support notable assemblages of invertebrates.
Plants		
LISI: Tree-of-Heaven	Present (within site)	Tree-of-heaven was present on site (TN 1). Tree-of-heaven is not listed on Schedule 9 of the Wildlife and Countryside Act 1981, it is a species of local concern as identified by the London's Invasive Species Initiative (LISI).

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5.1.2 Based on the findings of the PEA, the following features of ecological importance were either (a) assessed as likely to be absent from the Site, (b) have Negligible nature conservation value; or (c) are not within the Zone of Influence of the Proposed Development.

5.1.3 The following Potential Ecological Features of the site are therefore not considered further:

- Statutory and Non-Statutory Designated Sites;
- Priority Habitats;
- On-site Habitats
- Nesting birds (Schedule 1);
- Invertebrates;
- Bats-roosting; and,
- Bats-foraging/commuting.

6. Potential Impacts

6.1.1 The following section considers the likely impact of the proposals on designated sites, habitats and protected or notable species. This is based on those species for which potentially suitable habitat occurs within or adjacent to the Proposed Development site. Please refer to Table 3 for the definitions of the scale of constraints.

6.2 Habitats

Scattered Trees

6.2.1 The development has the potential for adverse impact on the scattered trees present adjacent to the site. The completion of construction activities and encroachment of works onto the habitat have potential to cause damage to the trees that could impact on their long-term health. Tree's roots could have irreversible damage as a result of sustained machinery movements or accidental damage during [14]excavation, an appropriate Root Protection Area (RPA) should be established.

6.3 Birds

6.3.1 Accumulated droppings around the building suggested some bird roosts/nests may have existed on-site, but none were observed during the survey. Removal of vegetation and building development in the nesting bird season could impact active nests, and irrespective of the species present could comprise a legal offence. Flat roofs provide nesting features and ledges identified onsite support nesting for local bird species.

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6.3.2 In addition to the risk associated with nesting birds on the building, scattered trees surrounding the site have potential to support nesting birds and impacts on the tree as a result of removal or an encroachment of works could comprise a legal offence.

6.3.3 The potential for impacts on breeding birds is considered to comprise a low constraint and requires mitigation to ensure the impacts are avoided and works are legally compliant.

6.3.4 A wide range of passerine bird species were recorded in the desk study. The trees and shrubs could support local assemblages of birds which might use the vegetation to nest within. Removal of vegetation in the nesting bird season could impact active nests and cause a legal offence. Loss of the shrubs, hedgerows, trees and grassland would have the potential to result in the loss of nesting and foraging bird habitat.

6.4 Plants

6.4.1 None of the habitats recorded during the extended UK Habitat Classification survey are of high botanical or habitat value and no native plant species of national importance were present.

6.4.2 Tree-of-heaven was present on site. This species has the potential to spread invasively within the urban environment and out-compete native plant species. The potential for impacts is considered to comprise a low constraint and mitigation is recommended to ensure impacts are avoided.

7. Mitigation, Compensation & Recommendations

7.1 Trees

7.1.1 All retained trees within and alongside the Proposed Development should be protected in line with BS 5837 – 'Trees in relation to design, demolition and construction'[15], as advised by an Arboriculturist.

7.1.2 To ensure the tree's roots are protected from irreversible damage as a result of sustained machinery movements or accidental damage during excavation, an appropriate Root Protection Area (RPA) should be established for each tree, in line with best practice guidance and discussion with an appropriate professional. BS 5837 identifies that an appropriate RPA should be based on the stem diameter of each individual tree, however localised conditions may need to be considered based on the urban nature of the Site and subsequent influences on root spread. Protection measures based on the identified RPA will also provide some protection to the tree trunk and canopy from accidental damage, although extension of the RPA to the canopy edge may be required in some cases.

7.1.3 Where an incursion into an RPA is required by the development, the effects of such incursion should be considered by an arboriculturist to ensure the effects upon the tree are not significant. An arboriculturist should also be consulted in circumstances where any damage is caused to retained trees, with an inspection carried out and recommendations for remedial measures carried out, such as removal of damaged limbs.

[15] BSI (2012) British Standard 5837:2012 – Trees in relation to design, demolition and construction. British Standards Institute, London.

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7.2 Birds

7.2.1 All birds, their active nests and eggs are protected from harm under the Wildlife and Countryside Act 1981 (as amended). This legislation makes it an offence to kill, injure or take any wild bird or to take, damage or destroy the nest of any wild bird while that nest is in use or being built. An offence could therefore occur during clearance and refurbishment work on the Site.

7.2.2 The buildings and vegetation could support nesting birds. To ensure legal compliance, clearance of habitat suitable for nesting birds (all vegetation and buildings) should be undertaken outside the nesting bird season (i.e., between October and February inclusive). However, should this not be practical, the following measures must be adhered to:

- Works must be undertaken in line with a Precautionary Working Method Statement (PWMS);
- Prior to clearance, an ecologist should carry out a nesting bird inspection of areas to be cleared;
- Should any active birds' nests be found, the work may not take place within an appropriate established buffer zone (usually 5 m), which should be left intact until it has been confirmed that the young have fledged, and the nest(s) is no longer in use.

7.3 Mammals

Wild Mammals

7.3.1 All wild mammals, including red fox (*Vulpes vulpes*), are protected by the Wild Mammals (Protection) Act 1996, which makes it an offence to intentionally cause any wild mammal unnecessary suffering by certain methods. Common wild mammals, such as red fox, may venture onto the site during the refurbishment and construction of the Proposed Development.

7.3.2 To avoid an offence, measures should be employed during the construction phase, including the covering of all deep holes and trenches overnight and/or the provision of planked escape routes for any wildlife that may fall in. In addition, any liquids held on-site should be stored in a secure lock-up. These measures should be implemented through a Demolition and Construction Method Statement (DCMS) or similar. Hoarding around the perimeter of the Site should also minimise the likelihood of any wild mammals gaining access to the site.

7.3.3 If mammal holes are found during the works, it is advised that proposed works do not interfere with these, and further ecological advice be sought.

7.4 Plants

7.4.1 Due to the presence of tree-of-heaven, an invasive plant species, it is recommended that a method statement be prepared post-planning to detail how the plants will be managed during construction, although this is not a legal requirement

8. Enhancements

8.1.1 The inclusion of ecological enhancements within development projects can bring a number of sustainability benefits that extend beyond simply the enhancement of biodiversity. Alongside the provision of habitat and foraging opportunities for faunal species, the inclusion of green infrastructure

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within development projects provides amenity benefits to the local community, through increasing access to and interaction with nature, along with a range of ecosystem services, including stormwater attenuation, temperature regulation and minimisation of the urban heat island effect.

8.1.2 The following measures would be suitable for integration into the Proposed Development site's design.

8.2 Landscaping Opportunities

8.2.1 Planting of landscaped areas work well when they comprise a variety of types to create structure and variation, with trees, shrubs, herbaceous plants, and grasses often incorporated into planting to provide variety.

8.2.2 Landscaping can also provide an opportunity for the replication of the garden environment with the provision of ornamental lawns or grassland areas along with planting beds providing opportunities for occupants to grow plants and fruit/vegetables.

8.2.3 The opportunities presented above are detailed within the proposed landscape design (Project No. 4194, Drawing No. 104)

8.3 Native Planting

8.3.1 It is recommended that plants with a known benefit to wildlife should be integral to the soft landscape plans and should include native species or climate resilient species of recognised wildlife value. The use of nectar-rich and berry producing plants will attract a wider range of insects, birds and mammals and continue to accommodate those already utilising the site. Where possible, larger shrubs should be under-planted to create greater structure and cover for wildlife. The use of block planting of single species should be avoided in favour of a higher diversity of plant types per square metre.

8.4 Good Horticultural Practice

8.4.1 Good horticultural practice should be utilised, including the use of peat-free composts, mulches and soil conditioners, native plants with local provenance and avoidance of the use of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

8.5 Species Enhancement

8.5.1 The delivery of species enhancements alongside the provision of habitats will improve opportunities for delivery of the right conditions for sustaining populations in the local area, which are food, cover, water and space[16]. Often the availability of cover in the form of nesting opportunities is one of the key limiting factors, and the delivery of artificial nesting and roosting boxes are identified in CIRIA guidance as

[16] Velazquez, L. S. (2005) Organic green roof architecture. Sustainable design for the new millennium. Environmental Quality Management 14, pp 73-85.

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providing an important contribution to providing alternative wildlife refuges and enhancing the biodiversity value of buildings cheaply and easily[17].

8.5.2 The value of enhancements for birds can be increased by providing nest boxes for a range of species, with a number of nesting boxes specifically targeted at providing nesting opportunities for specific species that are of conservation concern. The provision of boxes that target those identified in local BAPs and highlighted in the Birds of Conservation Concern report can help species in decline to recover within certain habitats, however the value of providing boxes targeting general species should not be overlooked with a combination of the two ensuring opportunities for birds in general are provided.

8.5.3 Artificial roosting opportunities for bats are less species specific, instead providing suitable conditions within a box for a range of species that would typically use crevices for roosting. The different boxes can provide specific opportunities for bats whilst others are designed to provide a range of conditions to accommodate a range of preferences between species.

8.5.4 The artificial nest/roost boxes for birds and bats can be provided to be both incorporated within the building fabric or affixed to a building or suitable tree within the landscaping.

[17] Newton, J., Gedge, D., Early, P. and Wilson, S. (2007) Building Greener – Guidance on the use of green roofs, green walls and complementary features on buildings. CIRIA C644

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9. Appendices / Annexes

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Appendix A Habitat Survey Map

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Appendix B Relevant Legislation

The Environment Act 2021

The focus of the Act is the "*…provision for targets, plans and policies for improving the natural environment…*" and its requirements are structured around a number of broad themes (noting this is not a comprehensive summary of the provisions):

Nature and biodiversity – Part 6 of the Act importantly makes provision for "*biodiversity gain in planning*" which will apply to applications under the Town & Countryside Act and the Planning Act. In addition, the responsibilities on Government or public bodies have changed, including through:

- strengthening the existing biodiversity duty;
- requiring biodiversity reports;
- setting up local nature recovery strategy areas;
- providing for national habitat mapping; and
- establishing species conservation and protect site strategies.

Section 98 and 99 introduce biodiversity gain requirements that make changes to the Town & Country Planning Act and The Planning Act. The commencement of these changes and whether secondary legislation will be required to enact them will have to be subject to legal interpretation and advice.

Conservation covenants– Part 7 of the Act makes provisions for conservation covenants which essentially support the "*biodiversity gain in planning*" concept by providing a mechanism through which any gains can be secured and managed. These come into force at the point that the Secretary of State "*by regulations appoints*".

The Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales. The Regulations provide for the designation and protection of 'European sites', the protection of 'European Protected Species', and the adaptation of planning and other controls for the protection of European Sites.

Under the Regulations, competent authorities (i.e. government departments and public bodies) have a general duty to have regard to the EC Habitats Directive and Wild Birds Directive. The Regulations place a duty on the Secretary of State to propose a list of sites which are important for either habitats or species (listed in Annexes I and II of the Habitats Directive respectively) to the European Commission. The Regulations also require the compilation and maintenance of a register of European sites, to include SACs and Special Protection Areas (SPAs) classified under Council Directive 79/409/EEC on the Conservation of Wild Birds (the Birds Directive). These sites form a network termed Natura 2000, now referred to as 'National Site Network'. The Regulations enable the country agencies to enter into management agreements on land within or adjacent to a European site, in order to secure its conservation.

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The Regulations also provide for the control of potentially damaging operations, whereby consent from the country agency may only be granted once it has been shown through appropriate assessment that the proposed operation will not adversely affect the integrity of the site. When considering potentially damaging operations, the precautionary principle applies i.e. consent cannot be given unless it is ascertained that there will be no adverse effect on the integrity of the site.

The Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2, or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 4. However, these actions can be made lawful through the granting of licences by the appropriate authorities. Licences may be granted for a few purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority is satisfied that there are no satisfactory alternatives and that such actions will have no detrimental effect on wild populations of the species concerned.

The Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) consolidates and amends pre-existing national wildlife legislation in order to implement the Bern Convention and the Birds Directive. It complements the Conservation of Habitats and Species Regulations 2017 (as amended), offering protection to a wider range of species. The Act also provides for the designation and protection of national conservation sites of value for their floral, faunal or geological features, termed Sites of Special Scientific Interest (SSSIs).

Schedules of the Act provide lists of protected species, both flora and fauna, and detail the possible offences that apply to these species. All relevant species-specific legislation is detailed later in this Appendix.

Schedule 1 – Part 1 relates to birds and their young, for which it is an offence to intentionally or recklessly disturb at, on or near an 'active' nest. Schedule 1 – Part 2 relates to birds afforded special protection during the close season which is 1 February to 31 August (21 February to 31 August below high-water mark), but which may be killed or taken outside this period.

The Countryside and Rights of Way (CRoW) Act 2000

The CRoW Act, introduced in England and Wales in 2000, amends and strengthens existing wildlife legislation. Legislation detailed in the Wildlife and Countryside Act 1981 (as amended) places a duty on government departments and the National Assembly for Wales to have regard for biodiversity and provides increased powers for the protection and maintenance of SSSIs. The Act also contains lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.

The Natural Environment and Rural Communities (NERC) Act 2006

Section 40 of the NERC Act places a duty upon all local authorities and public bodies in England and Wales to promote and enhance biodiversity in all their functions. Sections 41 (England) and 42 (Wales) list habitats and species of principal importance to the conservation of biodiversity. These lists superseded Section 74 of the CRoW Act 2000.

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UK Biodiversity Action Plan

The United Kingdom Biodiversity Action Plan (UK BAP), first published in 1994 and updated in 2007, was a government initiative designed to implement the requirements of the Convention of Biological Diversity to conserve and enhance species and habitats. The UK BAP contained a list of priority habitats and species of conservation concern in the UK and outlined biodiversity initiatives designed to enhance their conservation status. Lists of Broad and Local habitats were also included. The priority habitats and species correlated with those listed on Section 41 and 42 of the NERC Act.

The UK BAP required that conservation of biodiversity be addressed at a County level through the production of Local BAPs. These were complementary to the UK BAP, however, were targeted towards species of conservation concern characteristic of each area. In addition, several local authorities and large organisations have produced their own BAPs.

Species and Habitats of Material Consideration for Planning in England – UK Post-2010 Biodiversity Framework

In 2011, the government published the 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' to replace the previous England Biodiversity Strategy. In 2012 the UK BAP was replaced by the UK Post-2010 Biodiversity Framework.

Previous planning policy (and some supporting guidance which is still current, e.g. ODPM Circular 06/2005, now under revision), refers to UK BAP habitats and species as being a material consideration in the planning process. Equally many local plans refer to BAP priority habitats and species. Both remain as material considerations in the planning process, but such habitats and species are now described as Species and Habitats of Principal Importance for Conservation in England, or simply priority habitats and priority species under the UK Post-2010 Biodiversity Framework. The list of habitats and species remains unchanged and is still derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006. As was previously the case when it was a BAP priority species hen harrier continues to be regarded as a priority species although it does not appear on the Section 41 list.

The 'UK Post-2010 Biodiversity Framework', published in July 2012 succeeds the UK BAP and 'Conserving Biodiversity – the UK Approach'. The framework was produced by JNCC and Defra to set a broad enabling structure for action across the UK. Its purpose was to:

- Set out a shared vision and priorities for UK-scale activities, in a framework jointly owned by the four countries, and to which their own strategies will contribute.
- Identify priority work at a UK level which will be needed to help deliver the Aichi Targets and the EU Biodiversity Strategy.
- Facilitate the aggregation and collation of information on activity and outcomes across all countries of the UK, where the four countries agree this will bring benefits compared to individual country work.
- Streamline governance arrangements for UK-scale activity.

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Natural Environment White Paper – 'The Natural Choice: securing the value of nature' 2011

The principal aims of Natural Environment White Paper, published in June 2011, are to preserve and improve the natural environment, and build a connection between people and nature as well as introducing policies that will help 'move progressively from net biodiversity loss to net gain' through reforms such as 'biodiversity offsets'.

The 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' strategy builds on this, offering a more comprehensive approach to stop biodiversity loss such as emphasis on preserving and maintaining important habitats, priority habitats and connections between areas with special status such as SSSIs.

Birds of Conservation Concern 5: the Red List for Birds

The latest review of Birds of Conservation Concern 5: the Red List for Birds was published in December 2021.

Commonly referred to as the UK Red List for birds, this is the fifth review of the status of birds in the UK, Channel Islands and Isle of Man, and updates the last assessment in 2015. Using standardised criteria, 245 species with breeding, passage or wintering populations in the UK were assessed by experts from a range of bird NGOs and assigned to the Red, Amber or Green lists of conservation concern.

Protection of Badgers Act 1992

Under the Protection of Badgers Act 1992, it is an offence to disturb a badger in its sett or damage, destroy or obstruct access to a badger sett. If the proposed work will involve works coming within 30 m of an active badger sett Natural England's standing advice will need to be consulted and a mitigation plan drawn up. After which a licence will need to be applied for from Natural England to undertake any works. It should be noted that badgers cannot be captured and moved purely for development purposes.

Invasive Species (Enforcement and Permitting) Order 2019

This Order allows for the enforcement of Regulation (EU) No. 1143/2014 on the prevention and management of the introduction and spread of invasive alien species in England and Wales, including the relevant licences, permits and rules for keeping invasive alien species.

An enforcement regime is introduced, including criminal offences, licencing, and permitting provisions for Regulation (EU) No. 1143/2014 on the prevention and management of the introduction and spread of invasive alien species ("The IAS Regulation").

The IAS Regulation lists species of concern which cannot be imported, kept, bred/grown, transported, sold, used, allowed to reproduce, or released into the environment. There are currently 49 species listed, which can be found in the Annex of Regulation (EU) No. 2016/1141 adopting a list of invasive alien species of Union concern pursuant to Regulation (EU) No 1143/2014. The regulator is Natural England for England, offshore marine areas, and in relation to imports and exports.

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