Ecological Impact Assessment

UCL Bicentennial Projects - Main Quad and Wilkins Building, 04 September 2024

Tyler Grange

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Summary

S.1. This report has been prepared by Tyler Grange Group Limited on behalf of University College London (UCL). It sets out the findings of an Ecological Impact Assessment at the Main Quad only, Gower St, WC1E 6BT hereinafter referred to as 'the site'. The proposals comprise the redevelopment of the Main Quad and Wilkins Building as part of the UCL Bicentennial celebrations in 2026.

S.2. An 'extended' Phase 1/UK Habitat Classification (UK Habs) survey and Preliminary Bat Roost Assessment was undertaken on the 9 July 2024 of the Main Quad and on 21 August of the Wilkins Building. A summary of the results are as follows:

- The site is comprised of hardstanding, buildings, poor condition modified grassland (negligible ecological importance) and some mature native trees (local importance); and
- The site contains habitats that could support common and widespread nesting and foraging birds.

S.3. The data search returned two statutory sites of international importance within 10 km of the site, Lee Valley Special Protection Area (SPA) and Ramsar approximately 7.5 km northeast of the site. No impacts have been identified that can occur to these sites as a result of the proposed development. One statutory site of national importance was returned within 2 km of the site, Camley Street Nature Park Local Nature Reserve (LNR) approximately 1.1 km north east. Records of 35 non-statutory designated sites, including one proposed non-statutory site, were also returned within 2 km of the site. Of these, six SINCs lie within 1km of the site boundary, the closest of which comprises Gordon Street approximately 0.1 km east of the site. A full list of all sites identified within the relevant ZOIs are listed in **Table 2.1** below. No impacts to these sites are anticipated as long as best practice pollution prevention measures are implemented.

S.4. Habitats of negligible ecological importance to be lost to the development, such as developed land, require no specific mitigation. Habitats of local ecological importance to be lost, such as urban trees, will be more than compensated for through replacement planting in the form of native species tree, hedgerow, grassland and scrub planting.

S.5. Species-specific enhancements recommended within this report, which include native planting, would enhance the site for wildlife and increase the habitat diversity on site providing a range of nesting, foraging and commuting opportunities for species such as invertebrates, bats and birds.

S.6. The biodiversity net gain assessment found that the proposals would result in a loss of 0.09 habitat units (-3.23%) and a gain of 0.04 hedgerow units. The deficit of 0.35 habitat units will be offset through the purchase of units from a habitat bank.

S.7. It is anticipated that the proposed development would comply with relevant planning policies G5 and G7 of the London plan and A3 of the Camden Local Plan, as well as the National Planning Policy Framework (NPPF). This would also comply with Schedule 7A of the Town and Countryside Planning Act (TaCPA), once biodiversity units have been purchased, which mandates a 10% net gain in biodiversity units.

Section 1: Introduction and Context

Introduction

1.1. This report has been prepared by Tyler Grange Group Ltd on behalf of University College London (UCL). As part of the UCL Bicentennial celebrations in 2026, UCL propose to redevelop the Main Quad and the Wilkins Building at Gower St, WC1E 6BT (OS Grid Reference TQ 29556 82292). Proposals include the redevelopment and landscaping of the Main Quad and the redesign of the Wilkins Building interior and the installation of an air source heat pump on the roof of the Wilkins Building. See **Figure 1.1** for the indicative red line boundary, hereafter referred to as the 'site'.

Figure 1.1: Indicative red line boundary (© Google Aerial Imagery)

1.2. This report sets out the findings of an Ecological Impact Assessment (EcIA) undertaken for the site to support the planning application for this development.

Site Context

1.3. The site is approximately 0.86 ha and comprises developed land in the form of buildings and hardstanding, modified grassland, urban trees and line of trees. The site is located within the London Borough of Camden, bounded by university buildings and Gower Street immediately adjacent to west site boundary.

Purpose

1.4. This report:

- Uses available background data and results of the field surveys to describe and evaluate the ecological features present within the likely "Zone of Influence"[1] (ZoI) of the proposed development;
- Describes the actual or potential ecological issues and opportunities that might arise as a result of the site's development.
- Where appropriate, makes commitments for mitigation measures for adverse effects on ecological features as well as ecological enhancements, to ensure conformity with policy and legislation listed in **Appendix 2**; and
- Can be used to inform a planning application for the site's development.

1.5. This assessment and the terminology used are consistent with the Guidelines for Preliminary Ecological Appraisal[2] and the Guidelines for Ecological Impact Assessment[3]. A full methodology is set out in **Appendix 3**.

Methodology

1.6. Full methods for the data search, 'extended' phase 1/ UK Habs survey, Preliminary Bat Roost Assessment and BNG work can be found in **Appendix 3.**

Quality Control

1.7. All ecologists at Tyler Grange Group Limited are members of the Chartered Institute of Ecology and Environmental Management (CIEEM) or are working towards membership, and act under the direction of members and abide by the Institute's Code of Professional Conduct[4].

Limitations and Assumptions

1.8. Every effort has been made to provide a comprehensive description of the site. However, the following specific limitations apply to this assessment:

- Ecological survey data is typically valid for up to 18 months unless otherwise specified, for example if conditions are likely to change more quickly due to ecological processes or anticipated changes in management[5] (CIEEM, 2019).

[1] Defined by the CIEEM (2018) Guidelines for Ecological Impact Assessment as the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities. This is likely to extend beyond the project site, for example where there are ecological or hydrological links beyond the site boundaries
[2] CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
[3] 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.
[4] CIEEM (2022) Code of Professional Conduct, CIEEM, Winchester
[5] CIEEM (2019) On the Lifespan of Ecological reports and surveys, CIEEM, Winchester

- Records held by local biological record centres and local recording groups are generally collected on a voluntary basis. Therefore, the absence of records does not demonstrate the absence of species, it may simply indicate a gap in recording coverage.

- The interior of the heating unit could not be fully inspected due as the doors were closed and locked. The interior could be viewed partially through a gap in the doors. This was the only entry point into the structure. Given the sites location in an urban context with limited treelines and connectivity to suitable bat foraging and commuting habitat in the wider area it is considered unlikely bats would find and use the unit for roosting. In addition, the copper clad exterior and heated interior would likely be sensitive to fluctuations in temperature and therefore not provide an ideal stable roosting environment for bats. As such, it is considered that this is not a limitation and the survey results are considered accurate.

Section 2: Ecological Features and Evaluation

Designated Sites

2.1. The data search was based on records purchased from Greenspace Information for Greater London (GIGL), as well as data from the Multi-Agency Geographic Information for the Countryside (MAGIC). See **Appendix 3** for full methodology.

2.2. In London, non-statutory sites designated for their biodiversity importance are known as Sites of Importance for Nature Conservation (SINCs). SINCs are recognised by the Greater London Authority and London Borough Councils as important wildlife sites. SINCs are broken down into three tiers dependent on the geographic scale at which they are of importance, and these are, from most to least important:

- Sites of Metropolitan Importance;
- Sites of Borough Importance (Borough grade 1 and Borough grade 2); and
- Sites of Local Importance.

2.3. The data search returned two statutory sites of international importance within 10 km of the site, Lee Valley SPA and Ramsar which are approximately 7.5 km northeast of the site. One statutory site of national importance was returned within 2 km of the site, Camley Street Nature Park LNR approximately 1.1 km north east. Records of 35 non-statutory designated sites, including one proposed non-statutory site, were also returned within 2 km of the site. Of these, six SINCs lie within 1km of the site boundary, the closest of which comprises Gordon Street approximately 0.1 km east of the site. A full list of all sites identified within the relevant ZOIs are listed in **Table 2.1** below.

Table 2.1: Designated Sites

Designated site	Distance and aspect	Citation	Ecological Importance
Lee Valley Special Protection Area (SPA)	7.5 km NW	Populations of bittern *Botaurus stellaris*, shoveler *Anas clypeata*, and gadwall *Anas strepera*.	International
Lee Valley Ramsar site	7.5 km NW	Populations of shoveler and gadwall, as well as its populations of whorled water-milfoil *Myriophyllum verticillatum* and species of water boatman *Micronecta minutissi*.	International
Camley Street Nature Park Local Nature Reserve (LNR)	1.1 km NE	Urban wild space with a range of habitat examples that serves as an important educational and social resource.	National
Regent's Park SINC	0.8km W	Historic royal park supporting a variety of breeding and migrant bird species. Supports a Heronry that is one of London's largest.	Metropolitan
London Zoo SINC	0.8km W	One of London's top tourist attractions, designated for its educational importance and it's resource to local wildlife.	Borough I
Gordon Square SINC	0.1 km E	Urban square with trees and scrub that support a variety of breeding birds	Local
Russell Square SINC	0.5 km SE	One of the largest public squares supporting good numbers of mature trees and scrub.	Local
St George's Gardens SINC	0.8 km NE	Old churchyard site that is now managed as a public park.	Local
Coram's Fields SINC	0.8 km E	Public park with amenity facilities for children. Areas of the park support species associated with acid grassland	Local

Habitats and Flora

2.4. The habitats present on site are summarised below in **Table 2.2**, along with a description of the composition of the main plant species present and an assessment of their ecological importance. The location of habitats are shown on the Habitat Features Plan **17151/P01**.

Table 2.2: Habitats and Flora

Habitat	Description and Species	Ecological Importance	Photograph
Primary code: Built-up areas and gardens u1 Buildings u1b5	The Wilkins building comprises multiple wings dating from 1800s to 1980s. Proposals only concern removing the existing heating unit on the roof of the main building and replacing it with an air source heat pump. The unit heating unit was copper clad with doors. The interior of the unit could not be accessed as the doors were closed and locked. The inside of the structure could be partially viewed through a gap between the doors using a torch and endoscope. The interior was lined with polystyrene panels.	This habitat is of no intrinsic value to biodiversity and therefore is considered to be of **negligible ecological importance.**	
Primary code: Built-up areas and gardens u1 Developed land; sealed surface u1b	Hardstanding paths leading throughout the quad to university building entrances.	This habitat is of no intrinsic value to biodiversity and therefore is considered to be of **negligible ecological importance.**	

Habitat	Description and Species	Ecological Importance	Photograph
<u>Primary code:</u> Modified grassland g4 <u>Secondary code(s):</u> Mown 106	This habitat includes lawn grass mown short, with few herbs. The habitat is highly disturbed by foot traffic and comprises large areas of bare ground relative to the parcel size. Species present included perennial ryegrass *Lolium perenne*, wall barley *Hordeum murinum*, Canadian fleabane *Erigeron canadensis*, common daisy *Bellis perennis* and dandelion *Taraxacum sp*.	Modified grassland is relatively common in the wider landscape, composed of highly maintained vegetation, and in poor condition and is considered to be of **negligible ecological importance**.	
<u>Primary code:</u> Modified grassland g4 <u>Secondary code(s):</u> Scattered trees 32	The scattered trees throughout the site, species present included common lime *Tilia × europaea*, ginkgo *Ginkgo biloba*, tulip tree *Liriodendron tulipifera* and Indian bean tree *Catalpa bignonioides*. The trees are subject to occasional management.	Eleven out of sixteen scattered trees are native, mature species. As such, although they are common in the wider landscape, they are considered to be of **local ecological importance.**	

Protected and Notable Species

2.5. The below section sets out the potential for protected species on site. Species which are considered likely absent from the site based on professional judgement, following consideration the of habitats within the site, signs of species presence at the time of survey and data search records, are not discussed.

Bats

2.6. The data search returned records for nine bat species within 2 km of the site. Species included common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, Leisler's bat *Nyctalus leisleri,* noctule *Nyctalus noctule,* serotine *Eptesicus serotinus* and brown long-eared bat *Plecotus auritus*. The nearest of these was a record of soprano pipistrelle 0.8 km north of the site in 2016. In addition, two granted EPS licences for bats were returned within a 2 km radius of the site. The closest licence was located 0.3 km southwest of the site (case reference: 2014-6253-EPS-MIT) and was granted for the destruction of a resting place of common pipistrelle bats.

Bat Activity

2.7. The site lies within an urban context, with light pollution within and adjacent to site, and limited habitats for commuting and foraging bats in the wider landscape. It is assumed that light tolerant species, such as common and soprano pipistrelle, could forage within and adjacent to the site. The habitats on site, such as urban trees, don't provide significant commuting and foraging opportunities for bats due to their small size and low diversity.

2.8. Overall, the assemblage of bats utilising the site for foraging and commuting is considered to be of **negligible ecological importance**.

Preliminary Bat Roost Assessment

2.9. A Ground Level Tree Assessment (GLTA) was conducted alongside the 'extended' Phase 1 Habitat survey of all trees within the site boundary. Of these, no potential roost features were identified on any of the trees. As such, it is considered that all trees on site of negligible suitability for roosting bats.

2.10. A PBRA of the heating unit was undertaken on 21 August 2024. The structure was inspected externally. The interior of the unit could not be accessed as the doors were closed and locked. However the inside of the structure could be partially viewed through a gap between the doors using a torch and endoscope. No PRFs were noted externally or internally within the structure and therefore the heating unit is considered to be of negligible suitability to support roosting bats.

2.11. Therefore it is considered that the site is of **negligible ecological importance** for roosting bats and therefore are not considered further within this assessment.

Birds

2.13. The data search returned a number of records of protected and notable birds species within 2 km of the site. Of these, some species of relevance to the site include grey wagtail *Motacilla cinerea*, house sparrow *Passer domesticus*, and dunnock *Prunella modularis*.

2.14. One feral pigeon *Columba livia* was observed on the adjacent dome building and guano was noted in numerous areas around the roof, including the existing heating unit along with some feathers but no nests were observed. It is considered that this area could have the potential support nesting pigeons

2.15. Urban trees within the site boundary also have the potential to support common and widespread nesting birds.

2.16. It is considered the assemblage of birds that may use the site for foraging and breeding is of **negligible ecological importance**, nevertheless consideration for nesting birds to avoid a breach of legislation is discussed in **Section 3** of this report.

Invertebrates

2.17. The data search returned a number of records of protected and notable invertebrate species within 2 km of the site. Of note, the data search returned a number of butterflies and moths records, including large skipper *Ochlodes sylvanus* and small copper *Lycaena phlaeas*, and beetle records, including stag beetle *Lucanus cervus* within 0.5 km of the site.

2.18. Currently, the grassland provides little suitable habitat for invertebrates, given the lack of diversity and flowing plants within the lawn. Urban trees may support a wider assemblage of invertebrates, but a lack of deadwood was noted within the trees. Nonetheless, it is considered the assemblage of invertebrates that use the site is of **negligible ecological importance.**

Section 3: Ecological Impacts, Mitigation, and Enhancement

Proposed Development

3.1. The proposals are for the redevelopment and landscaping of the UCL campus Main Quad in line with the bicentennial celebrations in 2026. Proposals comprise the inclusion of open space to facilitate events and the provision of green spaces that can encompass nature and support biodiversity. The potential impacts at this site as a result of the proposed development are set out below, with reference to relevant legislation and planning policy, which is summarised in **Appendix 2**.

Design Evolution

3.2. The design of the Development has been iterative, and in accordance with policy and best practice guidance, follow the 'mitigation hierarchy'. As such, the Development has been designed to avoid and retain the most important ecological features to ensure they can be managed in the long-term to enhance their importance for biodiversity. Where this is not possible, new habitats have been proposed to compensate for habitat losses with the aim of maximising the overall ecological value of the habitats proposed on site.

3.3. Landscaping plans have been developed alongside Wild Bloomsbury, one of UCL's three signature campaigns to improve biodiversity, support wellbeing, build climate resilience and reduce air pollution for the local community.

Designated Sites

Statutory Sites

3.4. Given the nature of the site proposals and the distances involved between the site and Lee Valley Ramsar and SPA and Camberly Street Park LNR, no adverse direct or indirect effects are anticipated, and no specific mitigation is required.

Non-statutory Sites

3.5. Six SINCs lie within 1 km of the site boundary, the nearest of which is Gordon Square SINC, approximately 0.1km east of the site. . Impacts to SINCs during the operational phase are not anticipated due the nature of the proposals. Impacts to the SINCs during construction activities are unlikely to occur to the isolated nature of the site and nature of the proposals. Nonetheless, impacts could potentially occur to these sites via dust deposition and run-off. As such, best practice pollution prevention measures will be implemented to avoid potential impacts.

Habitats and Flora

3.6. Most of the habitats onsite to be impacted by the proposals are of negligible ecological importance, namely hardstanding and modified grassland, and as such no specific mitigation is required.

3.7. Three of the scattered trees, which are of local ecological importance, will be lost to provide emergency access to the proposed development. All these trees are ginkgo trees, a non-native species. One tree, a small tulip tree, will be relocated as part of the proposals. The planting of nine native species trees (see **Appendix 1**) is expected to more than mitigate for the loss of these trees.

3.8. The modified grassland, will be replaced with modified grassland of a better condition, comprising a more diverse species mix of 6 -8 species per m2 with at least two forbs. Mixed scrub and native hedgerow planting comprising mixes of native species are also proposed.

3.9. Overall, the native planting of trees, shrubs, and grassland is expected to improve the site overall for biodiversity.

Protected and Notable Species

Bats

3.10. No lighting during construction is proposed and it is anticipated that lighting levels post-construction will not be greater than current levels.

3.11. Through the retention of the majority of trees and new landscape planting, foraging and commuting bats may continue to use the site post-development.

Birds

3.12. All birds, their nests and eggs, are protected by law and as such it is an offence to intentionally kill, injure, or take any wild bird; intentionally take, damage, or destroy the nest of any wild bird while it is in use or being built; and intentionally take or destroy the egg of any wild bird.

3.13. To avoid triggering the legislation protecting nesting birds, clearance of suitable habitat, i.e. trees, should be timed outside the nesting bird season (generally taken as March to September inclusive, though this is not defined in law and birds may nest outside of this time). If any clearance works to nesting habitats are required during the nesting season, then pre-removal checks for nesting birds must be carried out by a suitably experienced Ecological Clerk of Works (ECoW), no more than 48 hours prior to the works commencing. If any nesting birds are found to be present, an appropriate buffer zone will be implemented, within which works are excluded for the duration of the breeding attempt. Any active nests will need to be left in situ until a suitably experienced ecologist confirms that the chicks have fledge and the nest is no longer active.

3.14. It is worth noting that feral pigeons may nest throughout the year, and the unit should be checked for nesting pigeon prior to removal. Should a nest be identified, then a ecologist should be contacted before continuing works.

3.15. Habitat creation such as native shrub and tree planting is expected to increase nesting opportunities on site.

Invertebrates

3.16. Current landscape proposals for the proposed development include provision of a variety of habitats and species rich grasslands which are expected to increase opportunities for invertebrates on site.

3.17. Current landscape proposals also include provision of:

- Invertebrate hotels, including the provision of structural habitat within retaining walls as hibernacula;
- Provision of standing deadwood and log piles;
- Provision of bare ground and sand to increase opportunities for ground nesting bees; and
- Ephemeral rain gardens, to provide intermittent wet areas with associated vegetation.

Section 4: Biodiversity Net Gain

4.1. Policy G6 of the London Plan 2021, as well as the NPPF, requires developments to demonstrate a net gain in biodiversity. (see **Appendix 2**). Schedule 7A of the Town and Country Planning Act states it is now mandatory for developments to achieve a 10% net gain.

4.2. A development achieves biodiversity net gain when the total biodiversity units present post-development is higher than that of the biodiversity units present on site prior to development. The Statutory Biodiversity Metric has been used to calculate the biodiversity value of the site before and after development in terms of "biodiversity units" to calculate an overall biodiversity net gain or loss.

Existing Habitats

4.3. The following habitats are present within the red line boundary of the site and are shown on Habitat Features Plan **17151/P01**. No watercourses were present. The rationale for condition assessments is detailed within the metric **17151/BNG**.

Table 4.1: Baseline Habitats and Areas Retained and Enhanced

Broad Habitat	Habitat Type	Area (hectares)	Distinctiveness	Condition	Area retained (hectares)	Area enhanced (hectares)	Area lost (hectares)
Individual trees	Urban tree	0.1384	Medium	Poor	0.0692	0.000	0.0700
Individual trees	Urban tree	0.2199	Medium	Moderate	0.2199	0.000	0.000
Grassland	Modified grassland	0.1700	Low	Poor	0.000	0.000	0.1700
Urban	Developed land; sealed surface	0.3100	V.Low	N/A - Other	0.000	0.000	0.3100
Urban	Developed land; sealed surface	0.3800	V.Low	N/A - Other	0.3800	0.000	0.000

Proposed Habit

4.4. The proposals, as shown within **Appendix 1** and the Post-development Habitat Plan **17151/P02,** have been used to calculate the proposed habitat areas. The rationale for target condition assessments is detailed within the metric **17151/BNG**.

Table 4.2: Created and Enhanced habitats

Broad Habitat	Habitat Type	Area (hectares)	Created/enhanced	Distinctiveness	Target Condition
Individual trees	Urban tree	0.0366	Created	Medium	Moderate
Grassland	Modified Grassland	0.0900	Created	Medium	Moderate
Urban	Developed land; sealed surface	0.3740	Created	V.Low	N/A - Other
Heathland and shrub	Mixed scrub	0.0160	Created	Medium	Moderate
A net loss of 0.09 habitat units, -3.23%					

Table 4.3: Created and Enhanced Hedgerows

Habitat type	Length (km)	Created/enhanced	Distinctiveness	Target condition
Native Species Rich Hedgerow	0.02	Created	Medium	Poor
A net gain of 0.04 hedgerow units				

Results Summary

4.5. As described within The Statutory Biodiversity Metric **17151/BNG** and summarised below in **Figure 4.1**, based on the habitats present on site that will be lost and those to be created, the development would result in a loss of 0.09 habitat units, and a gain of 0.04 hedgerow units. This is a percentage loss of 3.23% in habitat units and a gain in hedgerow units, the percentage not calculated due to a lack of hedgerows within the baseline.

4.6. In order to achieve a 10.00% net gain, the development will need to offset 0.35 habitat units including, 0.16 habitat units from the loss of three trees (one large and two medium ginkgo) to satisfy the metric trading rules. The loss of these three trees is unavoidable, as the design requires their removal to enable emergency services access into the quad and the adjoining buildings. Proposals include the relocation of a small tulip tree from the centre of the quad to the southwest of the site, for the purposes of biodiversity net gain, it is considered that this is tree will be retained. Proposals also include provision of nine small native trees in place of the lost trees. In order to satisfy trading rules, proposals would need to include high distinctiveness habitat or more trees, both scenarios are considered unsuitable for this site. As such, the required units will be offset off-site through a habitat bank provider.

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-0.09
	Hedgerow units	0.04
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-3.23%
	Hedgerow units	N/A
	Watercourse units	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

Figure 4.1: Biodiversity Net Gain Assessment Results Summary, taken from The Statutory Biodiversity Metric.

Management

4.7. The results of The Statutory Biodiversity Metric are based on the habitats within the site being maintained at a certain condition, as prescribed by the condition assessment sheets published by Defra.

4.8. Details of habitat establishment and long-term management will be provided through the production of a Habitat Management and Monitoring Plan (HMMP). The HMMP would set out the prescriptions for the establishment and maintenance of the habitats on site for 30 years.

Section 5: Conclusions

5.1. Two internationally designated sites, Lee Valley SPA and Ramsar, and one nationally designated site Camley Street Nature Park LNR were reviewed. No impacts are anticipated due to the nature of the proposals. Six non-statutory sites were reviewed, and no impacts are anticipated as a result of development, as long as standard best practice is followed to control impacts via air, run-off, and other pollutants.

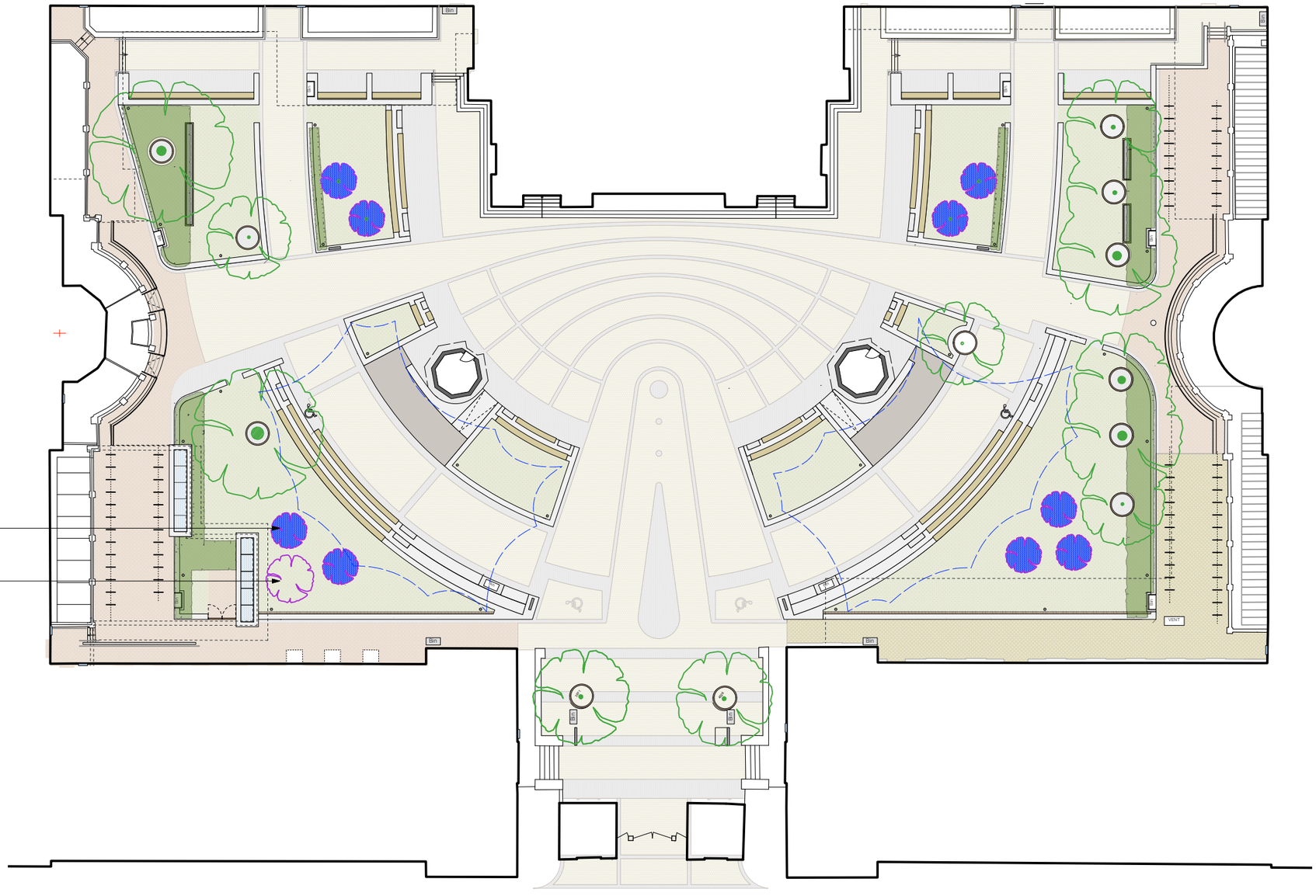
5.2. The development will primarily affect habitats of negligible ecological importance. The loss of three trees, of local ecological importance, will be compensated for by replacement tree planting. With the enhancements and habitat creation proposed, including native species planting, habitats of ecological importance on site will be enhanced, providing additional opportunities for biodiversity within the site.

5.3. Habitats on site are likely to be support common and widespread foraging and nesting birds. Should habitats suitable for nesting birds be removed during the core nesting bird season (March-August, inclusive), a pre-works check by an ECoW would be required to determine whether active birds' nests are present.

5.4. The proposals would result in a loss of 0.09 habitat units (-3.23%) and a gain of 0.04 hedgerow units. A suitable HMMP will be produced within the determination period of the application to ensure the long-term management of the proposed habitat enhancements, including proposed tree, hedge, and shrub planting. The deficit of 0.35 habitat units will be offset through the purchase of units from a habitat bank.

5.5. In conclusion, in anticipation of the implementation of any necessary mitigation, the proposed development will be compliant with relevant planning policies G5 and G7 of the London plan and A3 of the Camden Local Plan, as well as legislation with regard to ecology.

Appendix 1: Proposed Site Plan



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Appendix 2: Legislation and Planning Policy

Legislation

A2.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:

- The Environment Act 2021;
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- The Countryside and Rights of Way (CRoW) Act 2000;
- The Natural Environment and Rural Communities Act (NERC) 2006;
- The Hedgerows Regulations 1997; and
- The Protection of Badgers Act 1992.

A2.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2017 (as amended).

A2.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.

A2.4. The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Schedule 7A of the Town and Countryside Planning Act 1990

A2.5. Whilst the premise of BNG has been around prior to the Environment Act 2021, the Assent of the Act set the Framework for future legislation to be changed.

A2.6. This was in the form of the Town and Country Planning Act (TaCPA), specifically Schedule 7a of the TaCPA, which makes Biodiversity Net Gain a condition of planning (not a planning condition). The target 'gain' is currently set at 10% but the Secretary of State has the ability to change this and

became legally enforceable in February of 2024 for major developments and April for minor developments.

National Planning Policy

National Planning Policy Framework (NPPF), December 2023

A2.7. The updated National Planning Policy Framework (NPPF) was published in December 2023 and sets out the Government's planning policies for England and how these should be applied. It replaces the first National Planning Policy Framework published in March 2012.

A2.8. Paragraph 11 states that:

"Plans and decisions should apply a presumption in favour of sustainable development."
Section 11 of the NPPF, paragraph 120, sub-section b states that planning policies and decisions should:

b) "encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains such as developments that would enable new habitat creation or improve public access to the countryside;

c) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production"

A2.9. Section 15 of the NPPF (paragraphs 174 to 188) considers the conservation and enhancement of the natural environment.

A2.10. Paragraph 180 states that planning 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; and

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"

A2.11. Paragraph 181 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 185 states that in order 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[6]; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation[7]; 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."*

A2.12. When determining planning applications, Paragraph 186 states that 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[8] and a suitable compensation strategy exists; and*

d) *development whose primary objective is to conserve or enhance biodiversity should be supported; while 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."*

A2.13. As stated in paragraph 187 the following should be given the same protection as habitats sites[9]:

a) *"potential Special Protection Areas and possible Special Areas of Conservation;*

[6] Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

[7] Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

[8] For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

[9] The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

b) listed or proposed Ramsar sites[10]; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."

A2.14. Paragraph 182 states that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Local Planning Policy

The London Plan, The Spatial Development Strategy for Greater London, March 2021

A2.15. Policies relating to ecology and nature conservation can be found in Chapter 8: Green Infrastructure and Natural Environment, which are summarised as follows:

A2.16. 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.

Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.

Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:

- *identify key green infrastructure assets, their function and their potential function*
- *identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.*

Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

A2.17. 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

[10] Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.

such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

A2.18. Policy G6: Biodiversity and Access to nature

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

Boroughs, in developing Development Plans, should:

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

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

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

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.

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

A2.19. 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 – the area of London under the canopy of trees.

In their Development Plans, boroughs should:

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

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

Local Plans, Supplementary Planning Documents, Core Strategies[11]

Camden Local Plan, 2021

A2.20. Policies relating to ecology and nature conservation can be found in Chapter 6: Protecting Amenity, which are summarised as follows:

A2.21. Policy A3 Biodiversity

A2.22. The Council will protect and enhance sites of nature conservation and biodiversity. We will:

- *a. designate and protect nature conservation sites and safeguard protected and priority habitats and species;*
- *b. grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species;*
- *c. seek the protection of other features with nature conservation value, including gardens, wherever possible;*
- *d. assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed;*
- *e. secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;*

[11] The London Borough of Camden (2017) Camden Local Plan. Available: https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6 [Accessed 16 July 2024)

- *f. seek to improve opportunities to experience nature, in particular where such opportunities are lacking;*

- *g. require the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species;*

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

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

Trees and vegetation

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

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

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

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

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

Appendix 3: Methodology and Results

Data Search

A3.1. A desk-based study was conducted whereby records of designated sites and records of protected and priority species were purchased and interrogated for the site and the surrounding landscape. The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.

A3.2. The following resources were consulted/contacted:

- Multi-Agency Geographic Information for the countryside (MAGIC) website[12];
- Greenspace Information for Greater London (GIGL)[13]; (Data ordered on 5 July 2024 and received on 6 July 2024);
- London Borough of Camden Council website[14];
- Joint Nature Conservation Committee (JNCC) website[15];
- Natural England (NE) designated sites website[16];
- Ordnance Survey mapping; and
- Google Maps, including aerial photography.

A3.3. The following areas of search around the boundary of the site boundary were applied:

- 2 km for protected and priority species, national statutory designated and non-statutory sites; and
- 10 km for European statutory designated sites.

'Extended' Phase I Habitat Survey and UK Habs

A3.4. An 'extended' Phase 1 survey was carried out on the 9 July 2024 by William Wells BSc, a suitably experienced ecologist and qualifying member of CIEEM. The methods used during the walkover survey broadly followed methods used in an 'extended' Phase I habitat survey[17] and entailed

[12] https://magic.defra.gov.uk/ [Accessed 16/07/2024]
[13] https://www.gigl.org.uk/ [Accessed: 16/07/2024]
[14] https://www.camden.gov.uk/ [Accessed 16/07/2024]
[15] http://jncc.defra.gov.uk/ProtectedSites/ [Accessed 16/07/2024]
[16] https://designatedsites.naturalengland.org.uk/ [Accessed 16/07/2024]
[17] Joint Nature Conservation Committee (2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. JNCC, Peterborough.

recording the main plant species and classifying and mapping habitat types with reference to the Habitat Definitions provided by the UK Habitat Classification Working Group[18].

A3.5. Additionally, the habitats identified were evaluated for their potential to support legally protected and notable fauna species. Where access allowed, adjacent habitats were also considered in order to assess the site within the wider landscape and to provide information with which to assess possible impacts within the context of the site boundary.

A3.6. All habitats were assessed utilising the relevant condition criteria for the relevant habitat type under the statutory metric condition assessment, which included confirming 'pass' / 'fail' criteria taken from the UK Habitat/Phase 1 methodology where necessary.

Preliminary Bat Surveys

A3.7. The surveys followed standard methodologies set out in the Bat Mitigation Guidelines[19], the Bat Workers Manual[20] and Bat Surveys for Professional Ecologists- Good Practice Guidelines 4th Edition[21] and comprised:

- Preliminary Roost Assessment (PRA) – External and internal building inspection survey to assess potential of buildings on site to support roosting bats; and
- Ground Level Tree Assessment (GLTA) – Ground level inspection of trees to assess potential of trees on site to support roosting bats.

Preliminary Bat Roost Assessment (PBRA)

A3.8. A PBRA was undertaken on all buildings within the Site boundary. The assessment was undertaken on 21 August by Toni Cohen. All surveys were daytime inspections and the conditions for all surveys was considered optimal. The location of the buildings and trees at the site are shown on **Plan 17151/P01**. All buildings were inspected from the ground using binoculars, high powered torch, digital camera and endoscope for accessible features. In relation to buildings, such signs may include bat droppings, urine splashes, staining and features suitable for allowing bats access to roost (e.g. gaps behind soffits / hanging tiles / ridge tiles, lifted slates / flashing). The internal inspection of the buildings comprised a thorough search for evidence, where possible, of roosting bats in accessible loft spaces (i.e. droppings, urine stains) and an assessment of the presence of potential roosting features internally.

A3.9. The potential of the buildings and trees to support roosting bats was assessed using the criteria shown in **Table A3.1** overleaf.

[18] UKHab Ltd. (2023). UK Habitat Classification Version 2.0 (at https://www.ukhab.org)
[19] Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.
[20] Mitchell-Jones, A.J, & McLeish, A.P. (eds). (2004) 3rd Edition Bat Workers' Manual., JNCC, Peterborough, ISBN 1 86107 558 8
[21] Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6

Table A3.1: Building / Structure Assessment Criteria - adapted from Collins, 2023.

Suitability	Description of Roosting Habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions[b] and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats[c]).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[b] and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed)
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 their size, shelter, protection, conditions[b] and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

[a] Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).

[b] For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

[c] Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments. Common pipistrelle swarming has been observed in the UK and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland. This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.

Ground Level Tree Assessment (GLTA)

A3.10. A GLTA was undertaken on all trees within the Site boundary. The assessment was undertaken on 9 July 2024 by William Wells BSc. All surveys were daytime inspections and the conditions for all surveys was considered optimal. The location of the trees at the Site are shown on **Plan 17151/P01**. All trees were inspected from the ground using binoculars. Potential Roosting Features (PRFs) of interest are detailed in **Table A3.2** below.

Table A3.2: PRF Types that can be Exploited by Bats and How they Form - adapted from Collins, 2023.

PRFs formed by disease and decay	PRFs formed by damage	PRFs formed by association
woodpecker holes squirrel holes knot holes pruning cuts tear outs wounds cankers compression forks butt rots	lightning strikes hazard beams subsidence cracks shearing cracks transverse snaps welds lifting bark desiccation fissures frost cracks	fluting ivy

A3.11. The potential of trees to support roosting bats was assessed using the criteria shown in **Table A3.3** below.

Table A3.3: Assessment of Tree Suitability Criteria - adapted from Collins, 2023.

Roost Suitability	Description of Roosting Habitat
NONE	Either no PRFs in the tree or highly unlikely to be any
FAR	Further Assessment Required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

Biodiversity Net Gain

A3.12. The Statutory Biodiversity Metric operates by calculating the number of biodiversity units associated with a particular habitat type (both pre-and post-development) – the 'unit' value associated with each habitat type is calculated based on the following parameters:

- Size (in hectares)/Length (in km);
- Distinctiveness (i.e. how rare/valuable a given habitat is);
- Condition (i.e. how well the recorded habitat fits [or will fit] the standardised description of that habitat); and

- Strategic significance (i.e. if the existing or proposed habitat is within an area formally adopted in the local plan for green infrastructure or biodiversity improvements).

A3.13. When considering the creation of new habitats in the post-development site, other factors are also considered when calculating the 'unit' value of a given habitat and these are:

- Time to reach the target condition of each habitat; and
- Difficulty category for the creation of a given habitat.

A3.14. A calculation has been undertaken using the baseline habitats identified during habitat condition assessment survey, which was carried out on the 9 July 2024, alongside the 'extended' Phase 1 survey above. All surveys were carried out by William Wells BSc, a suitably experienced ecologist and qualifying member of CIEEM.

A3.15. The UK Habitat Classification was used to identify habitat types. Note that the calculation is completed separately for non-linear and linear habitats. Habitat areas entered into The Statutory Biodiversity Metric in hectares were rounded to four decimal places.

Evaluation

A3.16. The evaluation of habitats and species is defined in accordance with published guidance[22]. The scale of importance of each ecological feature is assigned within a defined geographical context, namely international and European, national, regional, county, and local. Below these are features considered to be of negligible importance.

A3.17. Consideration will also be given to legally protected or controlled species which are 'important features' in the context of this assessment, for which mitigation measures are required to ensure legal compliance, regardless of their geographic scale of importance. Thus, it is possible for a feature of negligible ecological importance to be legally protected and hence require mitigation.

A3.18. Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as Sites of Species Scientific Interest (SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. 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.

Impact Assessment

A3.19. The assessment of impacts identifies impacts and their effects as a result of the proposed development on important ecological features. This includes consideration of impacts at all relevant stages of the development, including construction and operation/occupation [include decommissioning and restoration, if relevant – it won't be for most projects]. The assessment

[22] 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.

includes reference to legislation and policy, and supplementary planning guidance where relevant.

Application of Mitigation Hierarchy

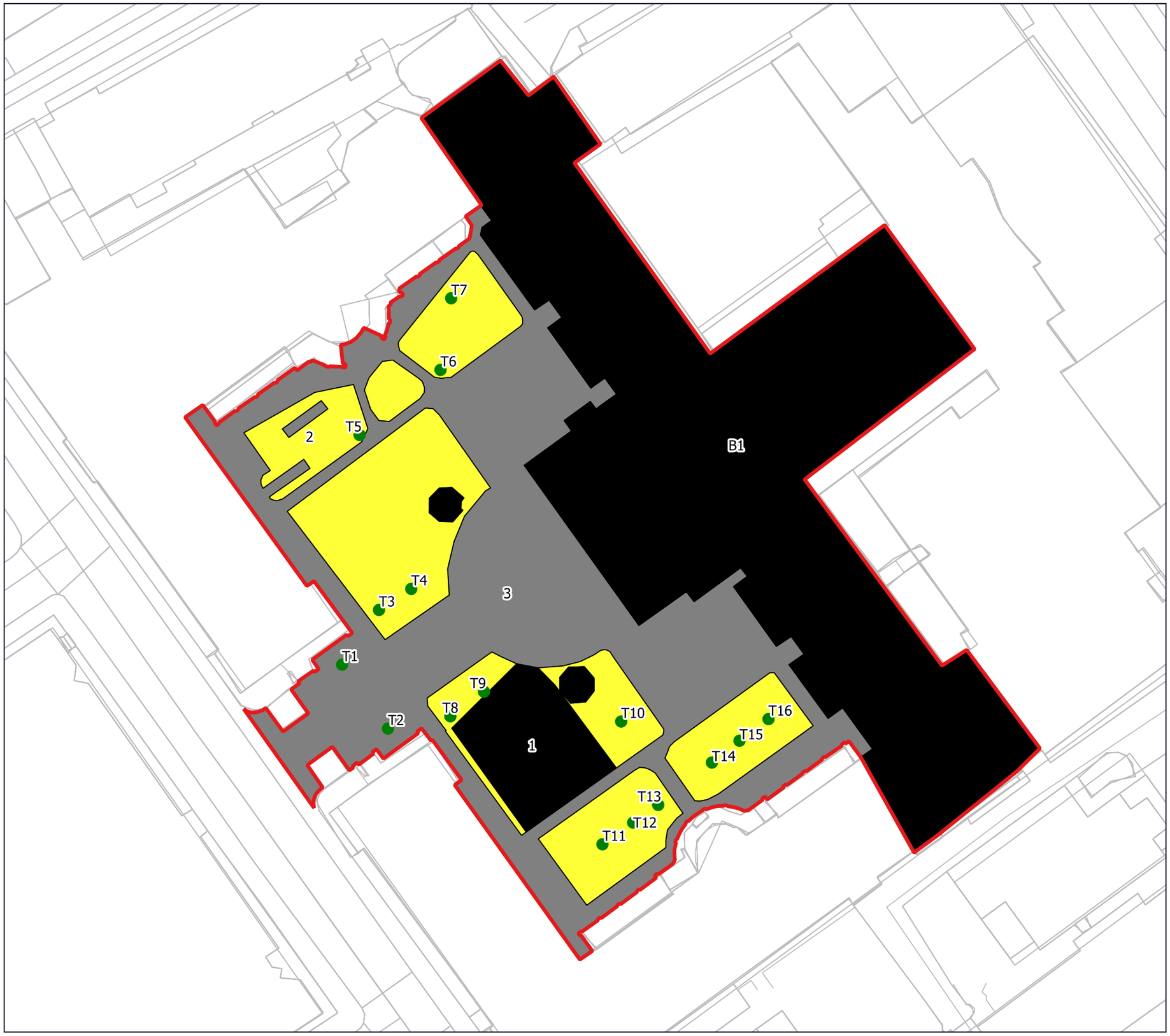
A3.20. Application of the mitigation hierarchy is fundamental to the ecological impact assessment process. This requires consideration of the following measures, in order of priority, for all potential impacts, to determine the most appropriate mitigation, compensation and enhancement strategy for the project. This is taken into account within **Section 3** of this report and set out below:

- Avoidance – measures to avoid harm to ecological features (set out in 'Design Evolution', Section 3);
- Mitigation – measures to avoid or minimise potential impacts as part of the design or guaranteed by planning controls;
- Compensation – measures required to offset significant residual negative effects following avoidance and mitigation; and
- Enhancement – measures over and above requirements for avoidance, mitigation and compensation to provide biodiversity net gain.

Plans:

Plan 1: Habitat Features Plan **17151/P01**

Plan 2: Post-development Habitat Plan **17151/P02**



Legend

Site Boundary

Area Habitats

u1b5 Buildings - 1

g4 Modified Grassland - 2

u1b Developed Land; Sealed Surface (Hardstanding) - 3

32 Urban Trees

N

0 10 20 m

Project	UCL 200
Drawing Title	Habitat Features Plan
Scale	1:600
Drawing No.	17151/P01
Date	August 2024
Checked	WW/RD

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Tyler Grange Group Ltd

Site Boundary

Area Habitats

u1b5 Buildings - B1

u1b Developed Land; Sealed Surface - 1

g4 Modified Grassland - 2

h3h Mixed Scrub - 3

32 Urban Trees

Newly Planted Tree

Retained

Replanted (Retained) Tree

h2a Native Hedgerow - H1 & H2

N

0 10 20 m

Project	UCL 200
Drawing Title	Post-Development Habitat Plan
Scale	1:600
Drawing No.	17151/P02
Date	August 2024
Checked	WW/RD

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