Preliminary Ecological Appraisal

for

Greater London House, Camden

February 2025

Status: For planning

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The Landscape Partnership Ltd is a practice of Chartered Landscape Architects, Chartered Ecologists, and Chartered Environmentalists. It is registered with the Landscape Institute and a member of the Institute of Environmental Management & Assessment and the Arboricultural Association.

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Quality Standards

This report is certified BS 42020:2013 'Biodiversity – code of practice for planning and development' compliant and has been prepared in accordance with The Chartered Institute of Ecology and Environmental Management's (CIEEM) Technical Guidance Series '*Ecological Report Writing'* and Code of Professional Conduct.

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Non-technical summary

The Landscape Partnership was commissioned by Lazari Investments Limited to undertake a Preliminary Ecological Appraisal comprising a desk study, UK Habitat Classification and an assessment of the potential of site features to support bats, together with an assessment of impacts at Greater London House, Camden.

The objectives of the appraisal were to identify the habitats and species present or potentially present and evaluate their importance, assess the impact of the development proposal and describe any measures necessary to avoid impacts, reduce impacts or compensate for impacts so that there is no net harm to ecological features.

The survey involved classifying and recording habitat types and features of ecological interest and identified the potential for protected species to be present by assessing habitat suitability for those species. The survey was undertaken by appropriately qualified and experienced personnel.

The site comprised a six-storey building with green roofs surrounded by hardstanding. Collectively the habitats within the proposed development site are assessed as being of **Lower** value at a **Neighbourhood** level.

Based on the habitat types present, it is not considered that the site currently has potential to support protected or priority species.

The proposed development is the refurbishment of parts of Greater London House, including proposals to the roof tops, entrance steps, external landscaping, reception and lower ground.

No further surveys are recommended at this stage.

A number of **ecological enhancements** have been proposed, which would improve the quality of the site for native flora and fauna, including bat boxes, bird boxes, and native species of known value to wildlife in planting. Delivery of these enhancements would lead to an overall **Minor Beneficial** impact, subject to the detailed layout.

Calculations of Biodiversity Net Gain (BNG) are required under the Environment Act 2021 for most developments; however, some development, may be exempt from the statutory requirement to deliver 10% Biodiversity Net Gain under the de minimis exemption i.e., where it can be demonstrated that the proposals affect less than 25sqm of onsite habitat. This report demonstrates that the refurbishment works at Greater London House included within this application do not impact more than 25sqm of onsite habitat and therefore are exempt from the statutory Biodiversity Net Gain requirement.

1 Introduction

1.1 Commission

1.1.1 The Landscape Partnership was commissioned by Lazari Investments Limited to carry out a Preliminary Ecological Appraisal (PEA), comprising a desk study, UK Habitat Classification and an assessment of the potential of site features to support bats, together with an assessment of impacts.

1.2 Legislation and policy background

1.2.1 There is a range of protection given to sites and species. Sites may be designated for local, national, or global importance for nature conservation. Species may be protected by varying levels of national regulation.

1.2.2 The Local Planning Authority has a policy to protect features of nature conservation value within its Local Plan. Other regulators have policies relating to the consents issued by them.

1.2.3 Further information is given in Appendix 1.

1.2.4 Assessment was undertaken against current legislation and planning policy, and in accordance with standard guidance. Further information is given in Section 2 and Appendix 2.

1.2.5 A Biodiversity Net Gain (BNG) assessment is required under The Environment Act 2021 for most planning applications. A minimum of 10% net gain is required as part of this legislation. There are, however, exemptions to having to provide a BNG assessment which are outlined on the government website[1]. One of these exemptions, known as the *de minimis* exemption, is if the development does not impact priority habitat and impacts less than 25 square meters of on-site habitats with a biodiversity value greater than zero and 5 metres of on-site linear habitats such as hedgerows.

1.2.6 The proposals for the entrance space and roof terraces fall below the threshold for requiring a BNG assessment because it does not contain priority habitats or hedgerows and will not impact any habitats with a value greater than zero. Thus, is exempt from providing a BNG assessment under the *de minimis* exemption.

1.3 Site location and context

1.3.1 Greater London House (GLH) is located within the London Borough of Camden. Previously, this building was a tobacco factory and has since been converted into offices. Access to the building is via Hampstead Road to the east.

1.3.2 The site comprises a building with several areas of green roof surrounded by hardstanding, including asphalt pathways. Several scattered street trees immediately surrounded the site but are located outside of the site boundary.

1.3.3 The boundaries of the site follow the outside of the building along the inside of the surrounding pavement. This includes the steps and ramps used to enter the site building.

1.3.4 The wider landscape consisted of the residential and commercial development of London.

1.3.5 The Ordnance Survey Grid Reference for the approximate centre of the proposed development site is TQ 2912 8327. The location of the site is shown in Appendix 3. A plan showing the site is provided at Figure 01.

1.4 Description of the project

1.4.1 The proposed development is for the refurbishment of parts of Greater London House. This will include proposals to the roof terraces, entrance steps and external landscaping to the reception and lower ground.

[1] https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments

1.5 Objectives of this appraisal

1.5.1 The purpose of this appraisal is to inform a planning application for the proposed development, as described above. Detailed objectives are to:

- identify the habitats and species present or potentially present and evaluate their importance;
- identify any ecological constraints to development;
- assess the impact of the development proposal;
- identify any opportunities available for integrating ecological features within the development;
- describe any measures necessary to avoid impacts, reduce impacts or compensate for impacts so that there is no net harm to ecological features;
- propose ecological enhancements;
- identify any additional surveys that may be required to inform an Ecological Impact Assessment (EcIA).

1.6 Previous ecological studies

1.6.1 There are no known previous ecological studies of the site.

1.7 Duration of appraisal validity

1.7.1 The assessment, conclusions and recommendations in this appraisal are based on the studies undertaken, as set out in this report, and the stated limitations. This appraisal is based on the project as described and any changes to the project would need the appraisal to be reviewed. Unless otherwise stated, the assessment, conclusions and recommendations given assume that the site habitats will continue to be used for their current purpose without significant changes until development takes place. However, changes in use or management may occur between the time of the survey and proposals being implemented. Ecological features may change naturally at any time; for example, species may be lost from existing sites or colonise new areas. Our knowledge of the ecology of the site enables us to provide an estimate of the duration of the validity of the surveys carried out and hence the applicability of this appraisal, so that any future need for review and update of this appraisal, or the surveys described within it, and the date by which such updates would become necessary, can be identified.

1.7.2 The table below sets out a guide to duration of validity of each element of each information source. If the proposed development is delayed beyond the stated timescale, updated surveys or further investigations may be required. Provided a planning application is made and validated prior to the end of the period stated below there would not normally be a requirement for a further update survey except as indicated in Section 4.6.

Information source	Date undertaken	Guideline duration of validity from date undertaken	Notes
Desk study	28th November 2024	2 years	Further data may become available.
UK Habitat Classification survey	3rd November 2024	2 years	The habitats on site may change especially if management changes.
Preliminary bat roost inspection: Buildings	3rd November 2024	2 years	Storm damage, maintenance, neglect or other factors can change bat roost potential of buildings.

2 Methodology

2.1 Desk study methodology

2.1.1 Greenspace Information for Greater London (GIGL) was asked to provide records of protected, rare and/or priority species and details of statutory and non-statutory designated sites, within the site boundary and within a 2km radius of the site. The data was received on 4th December 2024.

2.1.2 The Magic website[2] was used to identify European sites within a 10km radius and national sites within a 5km radius. Sites of Special Scientific Interest designated for bats were also identified within a 10km radius. The Magic website was also used to identify any Natural England mitigation licences or licence returns that were present within a 2km radius from the site boundary. The Magic website was accessed on 28th November 2024.

2.1.3 Aerial photographs and OS maps were used to gain initial information about the site and the surrounding area. This gives an indication of the types of habitat and species likely to be present and the setting of the site within the landscape.

2.1.4 Water bodies within 250m of the site were identified from the relevant 1:25,000 Ordnance Survey map sheet, to establish the need for protected species scoping surveys, such as great crested newt Habitat Suitability Index surveys. Consideration was also given to the green infrastructure of the local area.

2.1.5 The potential for protected, rare and/or priority species to be present on site has been considered in this assessment, taking into account the nature of the site and the habitat requirements of the species in question. Absence of records does not constitute absence of a species. Habitats on the site may be suitable for supporting other protected species that have not previously been recorded within the search area. Conversely, presence of a protected species in the search area does not imply its presence on-site. Records of alien species, non-localised records (e.g. tetrad records) and records dated before 1995 have not been described in detail but are taken into account when considering likely species presence or absence.

2.1.6 The data supplied by the Records Centre were considered in the assessment of potential impacts below.

Limitations to desk study methodology

2.1.7 Greenspace Information Greater London provided its data subject to terms and conditions. The data provided must not be distributed or published for an external or public audience, for example within the appendix of a report. Local Planning Authorities may request a copy of the data from GiGL either through their Service Level Agreement or as a data search. Consequently, the methodology does not provide results which we can reproduce in this report.

2.1.8 In accordance with BS42020 and advice from most Local Biological Record Centres, species lists are not appended to this report but are available to the Local Planning Authority on request.

2.1.9 Availability of records will vary in different locations, as many depend on the presence of local experts and survey effort within the local area. An absence of a record does not necessarily indicate the absence of that species.

2.2 UK Habitat Classification survey methodology

2.2.1 The standardised UK Habitat classification and mapping methodology[3] was followed. All habitats present and areas or features of ecological interest within such habitats were recorded and mapped. The survey methodology facilitates a rapid assessment of habitats and it is not necessary to identify every plant species on site. Where given, scientific names of plant species follow Stace ed. 4[4].

[2] MAGIC: https://magic.defra.gov.uk/MagicMap.aspx.
[3] UKHab Ltd (2023). *UK Habitat Classification Version 2.0 (at https://www.ukhab.org)*
[4] Stace, C (2019) *New Flora of the British Isles*. C&M Floristics. 4th Edition.

2.2.2 The survey was also used to identify potential for protected, rare and/or priority species, for example bats, mammals, amphibians and reptiles, to occur on, or in the vicinity of, the proposed Greater London House development. Although the survey methodology is not intended for species survey, any protected, rare and/or priority species which were seen during the survey were noted.

2.2.3 The survey was undertaken on 3rd November 2024, and the weather conditions were dry and overcast (cloud cover 90%), with no wind (Beaufort 0), and a temperature of 4°C.

Limitations to UK Habitat Classification survey

2.2.4 The UK Habitat Classification survey was undertaken outside the main flowering season for many species, including woodland ground flora, as well as being outside the seasons in which some invasive species would be visible, for example those that are annual, or which die back in winter. This was not a significant limitation given the habitats found in the site.

2.3 Bat Preliminary Ecological Appraisal methodology

2.3.1 The Preliminary Ecological Assessment for Bats, as described in the Bat Survey Guidelines[5] was undertaken.

2.3.2 In addition to the desk-top study described above, aerial photographs and other available images were reviewed. The client was asked if any previous bat surveys had been carried out, who carried them out, what the recommendations were and why a new survey is needed. Copies of reports were requested if available. Other relevant literature was searched for, where relevant.

2.3.3 A Daytime Bat Walkover was carried out concurrently with the Habitat Survey as described above. Structures (buildings and other built structures e.g. bridges, and underground features) and trees were inspected to assess if they could be suitable for bats to roost in, and habitats were inspected to assess if they could be suitable for bats to commute, forage, or swarm in. Roosting and foraging habitats, and flight paths were recorded separately where they existed.

2.3.4 The categories of potential suitability are listed and definitions are provided in Appendix 5, extracted from Table 4.1 of the Bat Survey Guidelines[6]. These categories were applied to the features seen.

2.3.5 The assessment of site features suitable for hibernation potential considered

- the suitability of features to support roosting bats or to allow access for roosting bats
- the temperature and humidity conditions likely to be present within the structure during the winter period and the suitability in this respect for it to be used by hibernating bats
- the surrounding habitat, in terms of its potential for use by bats outside of the hibernation period for commuting and/or foraging purposes (i.e. is it reasonable that bats are familiar with the area and therefore may be aware of suitable roosting locations within the site?)
- the presence of known roosts within the structure, or adjacent structures, or surrounding area during the active season

2.3.6 If there were no or very limited potential roost features in a structure, and/or the temperature and humidity conditions were unsuitable, the structure would be assessed as low potential. A 'classic' hibernation site such as an underground feature, cellar or tunnel would be assessed as high potential with further surveys required. A 'non-classic' site with some features and temperature/humidity being reasonably suitable would be assessed as moderate potential, with consideration as to further survey work.

2.3.7 If the surrounding foraging/commuting habitat was poor quality or had poor connectivity, consideration would be given to reducing the potential level of a structure. Conversely, if the surrounding foraging/commuting habitat was good quality and had poor connectivity, consideration would be given to increasing the potential level. The presence of a known roost would lead to consideration of increasing the potential level, but the absence of a known roost would not lead to a reduction of potential level.

[5] Collins J (ed) (2023) *Bat Surveys for Professional Ecologists Good Practice Guidelines*. Bat Conservation Trust

2.3.8 The potential suitability of trees was recorded as

- NONE – no potential roost features in the tree or highly unlikely to be any
- FAR – further assessment required to establish if potential roost features are present in the tree
- PRF – A tree with at least one potential roost feature present.

2.4 Preliminary bat roost assessment methodology: Buildings

Rationale

2.4.1 Bats are European Protected Species. Many roosts are within building or other structures, and the protection given to roosts means that their presence or absence in buildings and other structures on the proposed development site needs to be understood.

2.4.2 A Preliminary Roost Assessment (PRA) is a detailed inspection of the exterior and interior of a structure to look for features that bats could use for entry/exit and roosting and to search for signs of bats.

2.4.3 Structures were chosen for survey based on the Preliminary Ecological Appraisal (PEA) for bats, detailed in Section 2.3.

Methodology

2.4.4 The standard Preliminary Roost Assessment (PRA) methodology for structures[6] was followed. This aims of this survey is to determine the actual or potential presence of bats and the need for further survey and/or mitigation. In many situations, it is not possible to inspect all locations where bats may be present and therefore an absence of bat evidence does not equate to evidence absence.

2.4.5 The areas being impacted by proposals at Greater London House (Building 1) were inspected internally and externally. A search was made for direct evidence of bat presence. A systematic search pattern was used in order to avoid missing parts of the building or built structure, although some may not have been visible from accessible parts of the building. During the survey, a search was made for live or dead bats, droppings, urine splashes, fur-oil staining and clean, cobweb-free gaps around potential entrance points and crevice roost sites. The sound of bats was listened for. Feeding remains such as moth wings were also searched for, particularly internally. Potential access points and roosting sites were recorded even if there was no direct evidence of use by bats. The inspection was thorough and a consistent search effort was applied to all accessible parts of the buildings. Sometimes bats leave no visible signs of their presence in or outside a building, and rain can remove external signs.

2.4.6 The external search included the following, where these features were present:

- the ground, particularly beneath potential access points;
- any window-sills;
- window panes;
- walls and any loose mortar between bricks;
- behind peeling paint or lifted render;
- hanging tiles;
- weatherboarding;
- eaves;
- barge boards and soffit boxes;
- fascias;
- lifted lead flashing (particularly around chimneys); gaps under felt, including flat roofs;
- under tiles/slates;
- gaps in brickwork or stonework;
- in bat boxes;
- space between downpipe and wall;
- quoins; and

[6] Collins, J. (ed.) (2023) *Bat surveys for professional ecologists: good practice guidelines*, Fourth Edition, Bat Conservation Trust.

- all other relevant external features.

2.4.7 A high-power torch (LED Lenser T7.2) was used to survey the internal and external parts of the building, so that no evidence of bats was missed because of poor illumination. Close-focusing binoculars (Pentax Papilio 8.5 x 21) were used when inspecting the external parts of the building from the ground, in order to view features which might be used by bats to gain access to the building.

2.4.8 The internal search included the following, where these features were present:

- the floor and surfaces of furniture and other objects;
- behind wooden panelling;
- in lintels above doors and windows;
- behind window shutters, curtains and boarded up windows;
- behind pictures, posters, furniture, peeling paintwork or wallpaper;
- behind lifted plaster;
- inside cupboards;
- in chimneys accessible from fireplaces; and
- all other relevant internal features.

2.4.9 The survey of building(s) included an assessment of their potential to support bat roosts using the following categories.

Category	Description
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 site 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 and/or suitable surrounding habitat to be used on a regular basis or by large 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).
Moderate	A structure with one or more potential roost site that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, 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 site 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 and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classical cool/stable hibernation site.
Unknown	Unable to survey fully, for example because part of the building is inaccessible.

2.4.10 The assessment was undertaken on the same date as the UK Habitat Classification Survey on 3rd December 2024.

Limitations to preliminary bat roost assessment: buildings

2.4.11 There were no significant limitations to the survey.

2.5 Surveyor competencies

Survey(s) undertaken	Surveyor(s)	Experience (years)	Licences Held
UK Habitat Classification survey Bats: Preliminary Roost Assessment: Buildings	Emily Costello MCIEEM	10+	Great crested newt Class Licence CL08 (Level 1) Bat Survey Class Licence CL18 (Level 2) FISC Level 3
	Maya Harvey-Mills	1+	-

2.5.1 Staff undertaking surveys, or writing report sections, and who were still gaining experience with a particular topic to become capable (as defined by CIEEM competencies[7]) were supervised by staff who were at least capable or accomplished.

2.6 Assessment methodology

2.6.1 The assessment was undertaken in accordance with the Chartered Institute of Ecology and Environmental Management's Professional Guidance Series[8].

2.6.2 More details of the assessment methodology are provided in Appendix 2, but, in summary, the impact assessment process involves:

- identifying and characterising impacts;
- incorporating measures to avoid and mitigate (reduce) these impacts;
- assessing the significance of any residual effects after mitigation;
- identifying appropriate compensation measures to offset significant residual effects; and
- identifying opportunities for ecological enhancement.

2.6.3 The hierarchical process of avoiding, mitigating and compensating for ecological impacts is explained further below.

2.6.4 In Ecological Impact Assessment (EcIA) it is only essential to assess and report significant *residual* effects (i.e. those that remain after mitigation measures have been taken into account). However, it is considered good practice for the EcIA to make clear both the potential significant effects without mitigation and the residual significant effects following mitigation, particularly where the mitigation proposed is experimental, unproven or controversial. Alternatively, it should demonstrate the importance of securing the measures proposed through planning conditions or obligations.

2.6.5 Assessment of the potential impacts of the proposed development takes into account both on-site impacts and those that may occur to adjacent and more distant ecological features. Impacts can be positive or negative. Negative impacts can include:

- direct loss of wildlife habitats;
- fragmentation and isolation of habitats through loss of connectivity;
- disturbance to species from noise, light or other visual stimuli;
- changes to key habitat features; and
- changes to the local hydrology, water quality, nutrient status and/or air quality.

2.6.6 Negative and positive impacts on ecological features are characterised based on predicted changes as a result of the proposed activities. In order to characterise the impacts on each feature, the following parameters are considered:

- the magnitude of the impact;
- the spatial extent over which the impact would occur;

[7] https://cieem.net/resource/competency-framework/
[8] CIEEM (2016) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal*, Second Edition. Chartered Institute of Ecology and Environmental Management, Winchester.

- the temporal duration of the impact and whether it relates to the construction or operational phase of the development;
- the timing and frequency of the impact; and
- whether the impact is reversible and over what time frame.

2.6.7 Both short-term (i.e. impacts occurring during the site clearance and construction phases) and long-term impacts are considered.

Conservation status

2.6.8 The extent to which the proposed development may have an effect upon ecological features should be determined in the light of its expected influence on the integrity of the site or ecosystem. The integrity of protected sites is considered specifically in the light of the site's conservation objectives. Beyond the boundaries of designated sites with specific nature conservation designations and clear conservation objectives, the concept of 'conservation status' is used. Conservation status should be evaluated for a study area at a defined level of ecological value. The extent of the area used in the assessment relates to the geographical level at which the feature is considered important.

2.6.9 For habitats, conservation status is determined by the sum of the influences acting on the habitats and their typical species that may affect their long-term distribution, structure and functions, as well as the long-term survival of its typical species within a given geographical area. For species, conservation status is determined by the sum of influences acting on the species concerned and inter-relationships that may affect the long-term distribution and abundance of its populations within a given geographical area.

Confidence in predictions

2.6.10 It is important to consider the likelihood that a change or activity will occur as predicted and also the degree of confidence in the assessment of the impact on ecological structure and function.

- **Certain** probability estimated at above 95%
- **Probable** probability estimated above 50% but below 95%
- **Possible** probability estimated above 5% but below 50%
- **Unlikely** probability estimated as less than 5%

Cumulative impacts

2.6.11 Consideration is also given to the potential for the development proposal to give rise to significant negative impact in combination with other proposed developments in the local area.

Overall assessment

2.6.12 An overall assessment of value and impact is provided. This is based upon the highest level or value of any of the features or species present, or likely to be present on the site. Similarly, the overall assessment of impact is the impact of greatest significance.

2.7 Mitigation hierarchy

2.7.1 The following principles underpin EcIA and have been followed, where applicable, in this assessment.

- **Avoidance** Seek options that avoid harm to ecological features (for example, by locating the proposed development on an alternative site or safeguarding on-site features within the site layout design).
- **Mitigation** Adverse effects should be avoided or minimised through mitigation measures, either through the design of the project or subsequent measures that can be guaranteed – for example, through a condition or planning obligation.
- **Compensation** Where there are significant residual adverse ecological effects despite the mitigation proposed, these should be offset by appropriate compensatory measures.
- **Enhancement** Seek to provide net benefits for biodiversity over and above requirements for avoidance, mitigation or compensation.

3 Results

3.1 Desk study results

European sites

3.1.1 The following European site (Special Protection Area, Special Area of Conservation, and Ramsar sites which are treated as if they were European sites) was identified within the search area and is detailed within the table below.

Site	Distance from development site (approx.)	Direction	Key habitat/features of interest
Lee Valley SAC and Ramsar	7.1km	NE	An area designated for internationally important numbers of breeding and wintering wildfowl, especially Gadwall and Shoveler and for wintering Bittern.

Sites of national importance

3.1.2 The following site of national importance (Site of Special Scientific Interest, National Nature Reserve) was identified within the search area and is detailed within the table below.

Site	Distance from development site (approx.)	Direction	Key habitat/features of interest
Hampstead Heath Woods SSSI	4 km	NW	Hampstead Heath Woods are examples of long-established high forest woodlands with an exceptional structure comprising an abundance of old and over-mature trees providing dead wood habitat for a range of invertebrate species. Including the nationally rare jewel beetle A*grilus pannonicus* whose larvae develop in and under the bark of oak.

3.1.3 None of the SSSIs within 10km from the site boundary were designated for bats.

Sites of local importance

The following statutory sites of local importance (Local Wildlife Site, County Wildlife Site, Ancient Woodland, Local Nature Reserve) were identified within the search area and are detailed within the table below. This site information has been sourced from Magic Maps.

Site	Distance from development site (approx.)	Direction	Key habitat/features of interest
Camley Street Nature Park LNR	775m	E	The woodland, grassland and wetland habitats including ponds, reedbed and marshy areas, provide a rich habitat for birds, butterflies, amphibians and plant life.
Barnsbury Wood LNR	1.9km	NE	Originally a garden with surrounding houses, it has been left and become a woodland. Hosts wildlife including long-tailed tit, lesser stag beetle, common toad and the sixteen-spot ladybird. Also houses an 80 year old Chestnut tree.

Site	Distance from development site (approx.)	Direction	Key habitat/features of interest
Adelaide LNR	1.7km	NW	Covering an area of around 1.1 hectare, Adelaide LNR is predominantly an area of south-facing meadow with woodland at its eastern and western ends and a hedge at its southern border. The is an adjacent 'Private nature reserve' which consists of secondary woodland and is managed by Network Rail.
St. John's Wood Church Grounds Nature Reserve LNR	1.9km	E	Contains a mixture of woodland and meadow habitat, with a wide variety of ground flora and trees. A native hedgerow is also present. Area is visited by an array of bird species and the tall grass provide resources for insects and autumn feeding birds.

3.1.4 Greenspace Information Greater London provided its data subject to terms and conditions. The data provided must not be distributed or published for an external or public audience, for example within the appendix of a report. Local Planning Authorities may request a copy of the data from GiGL either through their Service Level Agreement or as a data search. Consequently, site details are not presented here, although the data were considered in the assessment of potential impacts below.

3.1.5 There were 36 Sites of Importance for Nature Conservation (SINCs) present within 2km of the site, three Sites of Metropolitan Importance, 16 Sites of Borough Importance (I & II) and 17 Sites of Local Importance within 2km of the site boundary. A summary sheet provided by Greenspace Information for Greater London can be found in Appendix 6.

Protected, rare and/or priority species

3.1.6 A number of species records were returned for the search area. Records for protected, rare and/or priority species from within the search area are summarised below. In accordance with BS42020 and advice from most Local Biological Record Centres, species lists are not appended but are available to the Local Planning Authority on request.

3.1.7 Greenspace Information Greater London provided its data subject to terms and conditions. The data provided must not be distributed or published for an external or public audience, for example within the appendix of a report. Local Planning Authorities may request a copy of the data from GiGL either through their Service Level Agreement or as a data search. Consequently, species information is not presented here, although the data were considered in the assessment of potential impacts below.

3.1.8 A summary sheet provided by Greenspace Information for Greater London can be found in Appendix 6.

3.1.9 Protected species information that was sourced from Magic Maps is detailed below. Information was sourced on [Company Fax].

Amphibians including great crested newts

3.1.10 A search on MAGIC maps for great crested newts (GCN) *Triturus cristatus* survey licence returns and mitigation licenses revealed none within a 2km radius of the site boundary.

Dormouse

3.1.11 A search on MAGIC maps for dormice mitigation licenses and licence returns revealed none within 2km of the site boundary.

Bats

3.1.12 A search on MAGIC Maps for bat mitigation licences and licence returns revealed common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus* within a 2km radius

of the site boundary. The nearest of these was a soprano pipistrelle which was approximately 470m south from the site boundary.

3.2 UK Habitat Classification survey results

3.2.1 The UK Habitat types that were identified during the survey are shown on Figure 01 and each habitat is described below. Primary habitat codes (levels 2-5) and secondary habitat codes are listed below in bold. Secondary habitat code descriptions (essential and additional) are unbolded.

Management, setting and green infrastructure

3.2.2 This site comprised a six-storey office building with several areas of green roof. This building was surrounded by hardstanding that consisted of asphalt pavements. Two of the green roofs were sunken to the third floor in the middle of the building and were surrounded by the rest of building.

3.2.3 The areas immediately surrounding the site were paved walkways with asphalt roads, intermittently scattered with trees and commercial buildings beyond that. This site is just to the east of the Euston railway line, approximately 60m at its closest points, and is within 500m east from Regents Park. The building is adjacent west of Harrington Square gardens and west of Oakly Square Garden by 200m.

3.2.4 Multiple areas of deciduous woodland lie in close proximity to the site. The closest woodland is approximately 175m to the east of the site. These woodlands are on the Priority Habitat Inventory.

3.2.5 The site is close to an area of small green space (Harrington Square) separated by an asphalt road, the canopies of the pavement trees and Harrington Square trees do not overlap and are not close enough to provide an ecological corridor connecting the two.

3.2.6 A railway line passes the site approximately 60m from the site boundary. Although railway lines often providing a valuable wildlife corridor for groups such as reptiles, the absence of vegetation and high density of rail tracks in this location suggests that it does not provide habitat connectivity to this site and acts as an ecological barrier.

Buildings u1b5

3.2.7 One large building (Building 1 (B1)) was present on site. Full building description can be found below.

Buildings u1b5 *other green roof* ***89***

3.2.8 Two green roofs were located on the roof of the third floor and were surrounded by the rest of the building given a sunken appearance. The green roofs appeared to be managed by occasional strimming. The sward height was varied with the vegetation on both roofs between 0-15cm tall.

3.2.9 On the southern lightwell grass species dominated 90% of the sward and consisted of abundant occurrences of cocks foot *Dactylis glomerata* and occasional Yorkshire fog *Holcus lanatus*. Broad leaved herbs showed occasional occurrences of dandelion *Taraxacum officinale* agg., yarrow *Achillea millefolium*, ribwort plantain *Plantago lanceolata,* white clover *Trifolium repens*, willowherb *Epilobium,* cleavers *Galium aparine*, yarrow *Achillea millefolium, Festuca* sp. With rare occurrences of broadleaved plantain *Plantago major,* red clover *Trifolium pratense,* dock sp., creeping thistle *Cirsium arvense,* cut leaf cranes-bill *Geranium dissectum,* oxeye daisy *Leucanthemum vulgare,* Smooth Sow-thistle *Sonchus oleraceus.*

3.2.10 The northern lightwell was also dominated by 90% grass abundantly covered in cocks foot with the occasional red fescue *Festuca rubra*. Forbs included occasional white clover, buddleia *Buddleja,* dandelion, oxeye daisy, yarrow, wild carrot *Daucus carota* and willowherb. Rare occurrences include red clover, mint *Mentha sp.,* vipers bugloss *Echium vulgare*, broad leaved dock *Rumex obtusifolius,* sow thistle, St-John's wort *Hypericum perforatum.*

3.2.11 On both green roofs there is evidence of irrigation from polyester pipes running across the area.

Developed land; sealed surface u1b

3.2.12 The roads and pavements surrounding Building 1 were covered in asphalt and bricks.

3.3 Bat Preliminary Ecological Appraisal results

Buildings and other structures

3.3.1 The potential use of buildings and other structures were assessed as shown in the table below.

Structure name and / or number	Potential (Appendix 5)	Description	Further survey needed?
Greater London House B1	Low	Large building with well maintained walls of brick and render.	Yes - PRA

Trees

3.3.2 There were no trees within the site boundary.

Potential flight paths and foraging habitats

3.3.3 The potential value of habitats as flight paths and foraging habitats were assessed as described in the table below.

Habitat	Potential (Appendix 5)	Description	Further survey needed?
Green roof	Negligible	The species provide some value to foraging bats; however, the two green roofs that were being impacted by proposals were sunken into the building, which limited the value to foraging bats given that they were concealed.	No

3.4 Preliminary bat roost assessment results: Buildings

Plans of the buildings surveyed

3.4.1 The building which were surveyed are shown on Figure 01. Photographs of this building is shown in Figure 02.

Building 1 - Greater London House

Exterior

3.4.2 Greater London House is a six-storey building which comprised office spaces and basement level car parking. The walls were covered in white render with sloped coping at the top, which were well maintained and sealed. There were ventilation bricks spaced periodically up and along the walls which had cobwebs and were likely lined with mesh, and so did not provide any potential bat roosting features. A large chimney stack, stretching from the ground level to above the sixth floor, was attached to the west side of the building. This was also covered in well maintained white render which was sealed completely. Railings and walls surrounded the building.

3.4.3 All sides of the building had windows on every floor, these were tightly fitted metal frames with glass panes and had no gaps. The doors to the building were tightly fitted into metal frames, allowing no access for bats. However, some windows were caged and had vents which could potentially be used by bats to access the basement area although these were likely sealed with mesh as well.

3.4.4 The fifth-floor roof was covered in bitumen roofing felt and had several good condition white rendered buildings. Some of these buildings had broken soffits but on close inspection these were deemed unsuitable for bat roosting. One of these buildings were easily accessible and had a large quantity of pigeon droppings. Metal plant containers with piping of various sizes and metal girders were spread across the roof but did not provide any potential bat access or roosting features.

Solar panels with metal framing were also present on the southern slopes of the sections of building that protruded onto the roof space.

3.4.5 The sixth-floor roof was in good condition and also showed no bat roost potential. An air conditioner (AC) outlet and metal containers with metal piping of various sizes and wires were present across the roof. Similar to the fifth-floor, metal girders were used as supporting structures and as a way for people to move across the roof. This roof housed vegetation planters and 2-3 bee houses at its southern end, which did not provide any potential roosting features for bats.

Interior

3.4.6 The main revolving door into the building was in good condition and tightly fitted to the surrounding metal frame. The interior of the building was modern, in good condition and in regular use by people. Internally, the windows of the building were in good condition and tightly fitted to the surrounding metal frames. The metal fire doors on the fifth and sixth floors were tightly sealed, providing no access features for bats.

3.4.7 The internal areas of the building were not fully surveyed given that the works are restricted to the roof and two green roofs surrounding the lightwells.

3.4.8 No bats or evidence of bats was found within sections of this building that are proposed to be impacted at the time of the survey. These sections of the building provided Negligible bat roost potential.

4 Evaluation of conservation status and impact assessment

4.1 Assessment rationale

4.1.1 The assessment is based on the ecological data presented within this report. Future changes in the wildlife present on site are beyond the scope of this report, unless specifically stated.

4.2 Evaluation of conservation status and assessment of designated sites

4.2.1 The ecological value of the site is considered below and evaluated using the methodology set out in Appendix 2 and in accordance with species legislation and planning policy, as outlined in Appendix 1.

European Sites and component Sites of Special Scientific Interest

4.2.2 There is one European site within a 10km radius of the development area. The Lee Valley SAC and Ramsar site is located approximately 7.1km north-east of the site boundary. This site is assessed as being of **Very High** importance for wildlife.

4.2.3 It is anticipated that no negative impacts to this site will result from the development proposed. This is due to the development not encouraging more people into the local area, the distance from this site and its setting within the already build-up urban area of London. Therefore, the impact of the proposed development upon European sites is **Neutral.**

Sites of national importance

4.2.4 There is one Site of Special Scientific Interest (SSSI) within the search area. This site is assessed as being of **High** importance for wildlife at the **National** scale. Sites of Special Scientific Interest which are within European sites are assessed above; there are no SSSI qualifying features separately to the European site designated features which would be assessed differently.

4.2.5 Sites of Special Scientific Interest (SSSI) Impact Risk Zones are used to assess the need for the LPA to consult Natural England on planning applications at varying distances from SSSIs. In accordance with the SSSI Impact Risk Zones User Guidance[9] consultation with Natural England would be required for the proposed development site for:

- **Infrastructure:** Airports, helipads and other aviation proposals.
- **Air Pollution:** Livestock & poultry units with a floorspace > 500m², slurry lagoons > 750m² & manure stores > 3500 tonnes.
- **Combustion:** General combustion processes >50MW energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.

4.2.6 The proposed development does not fall within these categories and therefore does not require the LPA to consult Natural England.

4.2.7 The impact of the proposed development upon the site of national importance is considered to be **Neutral**, due to the distance of the proposed development from the designated sites, the reasons for the sites' designation and the character of the development within its local context.

Sites of local importance

4.2.8 There are 36 Sites of Importance for Nature Conservation (SINCs) present within 2km of the site, three Sites of Metropolitan Importance, 16 Sites of Borough Importance (I & II) and 17 Sites of Local Importance. These sites are assessed as being of **Medium** importance for wildlife at a **County** scale.

4.2.9 The closest SINC to the site was approximately 375m west of the site boundary and was publicly accessible. This SINC had specific footpaths throughout and is used amenity by the wider area. Local people are encouraged to utilise this SINC and greenspace.

4.2.10 Other SINCs within 2km of the site boundary have similar measures in place as described above.

[9] Magic Maps www.magic.defra.gov.uk/MagicMap.aspx

4.2.11 Due to the proposed development not being a residential development, it will not attract more people into the area this will therefore not increase the amount of visitors or footfall to the local sites. For these reasons, the character of the proposed development and the reasons for the sites' designations, the impact of the proposed development is considered to be **Neutral**.

4.3 Evaluation of conservation status and assessment of habitats and green infrastructure

Habitats

4.3.1 The building itself and areas of hardstanding were considered to be of **negligible** ecological value. The green roofs were considered to be of lower to moderate ecological value given the species composition and management of these habitats. This value has been lowered given that the roofs are sunken into the building and might not be seen or be as accessible to invertebrates, birds and bats as they are concealed. The value of the green roofs was considered to be **Lower** at the **Neighbourhood** scale.

4.3.2 The impact of this development upon the site's green roof habitats is considered to be **Minor Adverse** without mitigation and subject to the development of comprehensive site layout plans. Once mitigation has taken place for this proposal the resulting impact will be **Neutral**.

Green infrastructure

4.3.3 The site does not provide important habitat linkage to habitats within the local area due to the lack of any vegetation in or around the site. There are green spaces within close proximity to the site; however, due to the nature of the site, they are not well connected via hedgerows or trees. The railway line also does not provide a commuting corridor to other green due to the lack of vegetation along the tracks and in fact acts as an ecological barrier.

4.4 Evaluation of conservation status and assessment of species

Veteran trees

4.4.1 There are no veteran trees present on the site so the value of the proposed development site for these is therefore **Negligible.** The impact of the proposed development upon veteran trees is **Neutral**

Plants

4.4.2 The character of the habitats recorded at the site and the plant records returned for the local area, suggests that the site has no potential to support protected, rare and/or priority plants. The value of the proposed development site for this group is **Negligible** and the impact of the proposed development is **Neutral.**

Invertebrates

4.4.3 The character of the habitats recorded at the site and the invertebrate records returned for the local area, suggests that the site has no potential to support protected, rare and/or priority invertebrates. The value of the proposed development site for this group is **Negligible** and the impact of the proposed development is **Neutral.**

Amphibians including great crested newts

4.4.4 Natural England's *Method statement template for great crested newt mitigation licence*[10] is used to determine the risk of great crested newts being harmed by the development. The area of the site is measured from OS maps and inputted into the great crested newts rapid risk assessment as part of the NE method statement. This informs the distance from the site boundary, whether that be 100m, 250m or 500m, required to identify that an offence to great crested newts is *highly unlikely,* see table below. A large-scale OS map is then inspected to identify any ponds within the buffer distance.

[10] https://www.gov.uk/government/publications/great-crested-newts-apply-for-a-mitigation-licence

Distance of breeding pond (m)	Maximum area lost or damaged (hectares)		
	Green: *Offence highly unlikely*	**Amber: *Offence likely***	**Red: *Offence highly likely***
0 - 100	Up to 0.01	0.01-0.5	>0.5
100 - 250	Up to 0.5	0.5-10	>10
250+	Up to 5	5-10	N/A

4.4.5 Guidance on risk assessment categories

- **'Green', offence highly unlikely**: indicates that the development activities are of such a type, scale and location that it is highly unlikely any offence would be committed should the development proceed. Therefore, no licence would be required. However, precautions may need to be taken to avoid an offence.
- **'Amber', offence likely**: indicates that the development activities are of such a type, scale and location that it is likely. Design plans for the development may need to be altered (location, layout, methods, durations or timings) to minimise the effect on great crested newts and if the scheme still results in a likely offence a licence may be required to carry out the works.
- **'Red', offence highly likely:** indicates that the development activities are of such a type, scale and location that it is highly likely. Design plans for the development should be altered (location, layout, methods, durations or timings) to minimise the effect on great crested newts and if the scheme still results in a likely offence a licence may be required to carry out the works.

4.4.6 The rapid risk assessment is a simplistic assessment and provides a general overview of a situation. The following factors should be considered when using the rapid risk assessment; population size, terrestrial habitat quality, presence of dispersal barriers, timing and duration of works, detailed layout of development in relation to places newts may use for shelter and dispersal routes. The following factors could increase the risk of committing an offence: large population size, high pond density, good terrestrial habitat, low pre-existing habitat fragmentation, large development footprint, and long construction period. The following factors could decrease the risk: small population size, low pond density, poor terrestrial habitat, substantial pre-existing dispersal barriers, small development footprint and short construction period.

4.4.7 The area of the site is approximately 1.4ha, therefore any development within 250m of a breeding pond for great crested newt would cause an *Amber: Offence likely* impact and a *Red: Offence highly likely* for ponds within 100m. There were no ponds within 250m of the site boundary.

4.4.8 The terrestrial habitats within the site were not considered to be suitable for great crested newts, as the site was predominantly covered in buildings and hardstanding, which did not provide suitable commuting or sheltering opportunities. This coupled with the elevation of the green roofs and the inability for great crested newts to climb at this scale makes the site unsuitable for great crested newt habitation. The site was also not connected to suitable habitats within the local area.

4.4.9 The absence of ponds on site, the absence of ponds within 250m of the site and the poor suitability of the terrestrial habitats on site suggests that there is no reasonable likelihood of great crested newts being present. The value of the proposed development site for this group is **Negligible** and the impact of the proposed development is **Neutral**.

Reptiles

4.4.10 The terrestrial habitats within the site boundary were not considered to be suitable for reptiles as the site was predominantly covered in buildings and hardstanding, which did not provide suitable commuting or sheltering opportunities.

4.4.11 The elevation of the green roofs and the inability for reptiles to scale a building of that size made the green roofs inaccessible to any reptiles that may be in the local area. This coupled with the lack of reptile records returned from the local area, suggests that the site has no potential to support protected, rare and/or priority reptiles. Therefore, the value of the proposed development site for this group is **Negligible** and the impact of the proposed development is **Neutral.**

Birds

Breeding birds

4.4.12 The site offered suitable nesting opportunities for birds such as gulls; however, no evidence of nesting was recorded during the survey. The site did not provide any vegetation suitable for use by common breeding bird species for nesting or foraging due to the lack of vegetation and suitable habitats. It is considered that the value of the site to breeding birds is **Negligible**. Avoidance measures have been suggested in Section 5 to avoid the possibility of an offence being committed.

Wintering birds

4.4.13 There are no habitats present on site which might support significant populations of wintering birds. The site is considered to be of **Negligible** value for this group.

Dormice

4.4.14 There was no dormouse records returned for the site, and there were no suitable habitats within this site for this group. The inaccessible green roofs offered an inadequate resource for this species. The site is therefore considered to be of **Negligible** value for this species and the impact of the proposed development is **Neutral**.

Terrestrial mammals including badgers

4.4.15 There was no badger records returned for the local area, and there were no suitable habitats within this site for this group. The inaccessible green roofs were also unsuitable for sett construction or foraging activity. The site is therefore considered to be of **Negligible** value for this species and the impact of the proposed development is **Neutral.**

Aquatic mammals including water voles and otters

4.4.16 There were no watercourses or waterbodies within the site or in close proximity that offered suitable opportunities for otters or water voles. The site did not provide suitable terrestrial habitats for this group and lacked suitable connectivity to watercourses in the local area.

4.4.17 The character of the habitats recorded at the site and the mammal records returned for the local area, suggests that the site has no potential to support protected, rare and/or priority aquatic mammals. The value of the proposed development site for this group is **Negligible** and the impact of the proposed development is **Neutral.**

Bats

Roosting potential – trees

4.4.18 There were no trees within the site. The value of the site for bats roosting in trees is considered to be **Negligible** and therefore impact of development is considered to be **Neutral**.

Roosting potential – buildings

4.4.19 The sections of the building being impacted by proposals did not provide any roosting opportunities for bats. There were cracks within the roof buildings walls coping which appeared superficially suitable for crevice-roosting bats; however, no signs of use were identified, and the presence of cobwebs within these features is likely to discourage bats from roosting within them.

4.4.20 The site is assessed as having **Negligible** importance for roosting bats, and the impact of the proposed development is therefore assessed as being **Neutral**.

Foraging/commuting potential

4.4.21 Based on the evidence gained during the UK Habitat Classification survey, the site is likely not used by bats for commuting or foraging purposes due to a lack of suitable foraging and commuting habitat. As well as the two of the green roofs being sunken and surrounded by the

rest of building, concealing it from the local bat populus. The value of the site to foraging and commuting bats is considered to be **Negligible** and the impact of the proposed development is **Neutral.**

4.5 Cumulative impacts

4.5.1 There are no known cumulative impacts.

4.6 Proposals for further survey or investigation

Surveys

4.6.1 No further survey or investigation is required.

Biodiversity Net Gain calculations

4.6.2 A Biodiversity Net Gain (BNG) assessment is required under The Environment Act 2021 for most planning applications. A minimum of 10% net gain is required as part of this legislation. There are, however, exemptions to having to provide a BNG assessment which are outlined on the government website[11]. One of these exemptions, known as the *de minimis* exemption, is if the development does not impact priority habitat and impacts less than 25 square meters of on-site habitats with a biodiversity value greater than zero and 5 metres of on-site linear habitats such as hedgerows.

4.6.3 It is considered that the planning application that involved the entrance space and roof terraces (GLH 1) falls below the threshold for requiring a BNG assessment because it does not contain priority habitats or hedgerows and will not impact any habitats with a value greater than zero. Thus, is exemption from providing a BNG assessment under the *de minimis* exemption.

4.6.4 The planning application for GLH 2 was submitted prior to BNG becoming mandatory under the Environment Act 2021 and a non-material amendment to the extant planning application is proposed. It is therefore considered that the GLH 2 project does not need a BNG assessment as part of this amendment. If at a later stage a new planning application is submitted for GLH 2 project; then a BNG assessment will be required in accordance with the Environment Act 2021, as it impacts more than 25m^2 of green roof so does not fall into the *de minimis* exemption category.

[11] https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments

5 Mitigation hierarchy measures

5.1 Features with no impacts arising

5.1.1 No mitigation hierarchy measures are needed for the following ecological features, because no significant impacts have been identified: European sites and nationally important designated sites; sites of local importance; veteran trees; plants; invertebrates; great crested newts and other amphibians; reptiles; wintering birds; badgers; dormice and aquatic mammals such as water vole and otter, and bats.

5.2 Avoidance measures

5.2.1 The following impact avoidance measures have been identified and will be delivered.

Breeding birds

- Any external works should take place outside of the bird breeding season of March to August inclusive, to prevent disturbance to birds, or if removed in that period, only after a survey has shown that no active nests are present. This is to ensure that gulls or other urban roof dwelling birds are not nesting on the roof prior to works.

5.3 Species licencing

5.3.1 A European Protected Species licence would be needed to implement any impacts upon great crested newts, otter, bats or dormice such as damaging a place used for shelter or disturbing the species in its place of shelter. At present this is unnecessary as no sheltering habitats for these species were found in site.

6 Enhancement measures

6.1 Ecological enhancement

6.1.1 Ecological enhancement aims to improve the quality of the site and the immediate vicinity for native flora and fauna. Such enhancements can also provide aesthetic appeal and can add value to the proposed development.

6.1.2 Enhancement opportunities specific to the development proposals for this site are provided below. It is not anticipated that all of these options would be utilised. The options are listed in order of priority, with habitat enhancements having most benefit to wildlife. Small-scale enhancements targeted at individual species, whilst valuable, are generally of less overall benefit than habitat enhancement measures.

6.2 Habitat enhancement

6.2.1 As mentioned previously, compensation that is in excess of no net will provide enhancement.

6.2.2 Wherever possible, planting would use native species, which support biodiversity significantly better than non-native plants. This is due to the numbers of flowers, fruits, seeds and berries that are produced by our native species and their different flowering and fruiting times throughout the year.

6.2.3 Habitat enhancements include the following.

- A contribution to the 'B-Lines' project[12] should be made on the green roofs by seeding with a bee friendly seed mix and use of native flowering bee friendly planting scheme.
- Proposed ornamental planters on green roofs should include species of known value to wildlife (which might include native species), such as berry-bearing species to provide for bird foraging species and species known to provide a good nectar source. These should also provide a structurally diverse range of plants to support invertebrates.
- Planting a range of both summer and winter-flowering plants and shrubs such as lavender *Lavandula* sp, rosemary *Rosmarinus officinalis*, Grevillia *Grevillia juniperum* and Mahonia *Mahonia* species would support pollinators year-round.
- Drought tolerant, aromatic sliver leaved plants and textural grasses to provide movement and height, including *Sedum* sp., *Alchemilla mollis,* and *Verbena* sp.
- Shade tolerant herbaceous plants and shrubs for the overshadowed areas of the terrace.
- Pre-grown climbing panels which will be made up of hardy low maintenance climbing plants to screen off the terrace from overlooking buildings.

6.2.4 These enhancements would benefit common invertebrates, breeding birds and foraging.

6.3 Small-scale species enhancement measures

6.3.1 Small-scale enhancements to benefit individual species/species groups would include the following.

- At least one externally mounted bat box (e.g. Vivara, Ibstock, Habibat or similar), suitable for a range of bat species, should be attached to the walls surrounding the external green roofs. These boxes should be located on the south-eastern to south-western elevations, in a sheltered area exposed to the sun for part of the day and should be positioned at least 5m above roof level. Boxes should avoid being positioned above doors and windows.
- At least one swift box (e.g. Vivara or similar) should be attached to the walls of the building. These should be placed positions at least 5m above roof level. Boxes should avoid being positioned above doors and windows.
- At least two bee boxes, one per green roof, should be incorporated into the design. These can be placed on poles in sunny locations if not possible to integrate them into the building. These boxes would provide habitat for solitary bees on site.

[12] https://www.buglife.org.uk/b-lines-hub

- At least one habitat piles should be created, using woody cut material (brash). These should be stacked in a quiet, sheltered corner of the site to form piles measuring approximately 1m x 0.5m x 0.5cm.
- Creation of varying levels of substrate depth, ranging from 80mm to 150mm, to the existing green roof areas with at least 30% of the roof at 150mm deep.
- Overseeding existing green roof areas with wildflower seed mix and inclusion of yellow rattle in seed mix to reduce the dense sward of grasses. A shade tolerant seed mix would be appropriate for this project. At least 25 wildflower species will need to be introduced.
- Introduction of Sedum species to the existing area of green roof

7 Recommendations

7.1 Recommended further work needed prior to an application

7.1.1 A Biodiversity Net Gain assessment is not considered necessary as the proposals fall under the de minimis exception, as set out in Section 4.6.

7.2 Recommended reports

Landscape and ecological management plan

7.2.1 It is recommended that a Landscape and Ecological Management Plan (LEMP) setting out the proposed aftercare and long-term management of the proposed planted areas is prepared. A management plan would be produced in conjunction with the landscape architects and ecologists to ensure that the planting areas provide a rich biodiverse environment. This would be suitable to be conditioned as part of the planning permission.

7.3 Recommended conditions

7.3.1 It is recommended that the following conditions, based on model conditions in Appendix D of BS42020:2013, are applied to the planning permission.

7.3.2 A nest check for birds such as gulls, should be carried out if construction work commences between 1st March and 31st August inclusive. If a gull nest is present then all work must stop until it has been determined that either there are no chicks in the nest or that the chicks present have fledged, and the nest is no longer being used.

7.3.3 A Landscape and Ecological Management Plan (LEMP) for the green roofs and planting shall be submitted to, and be approved in writing by, the local planning authority prior to the occupation of the development. The content of the LEMP shall include the following.

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organization responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body/ies responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

8 Conclusions

8.1.1 The purpose of this report was to inform a planning application for the proposed development.

8.1.2 The overall value of the site to wildlife is considered to be **Lower** at the **Neighbourhood** scale.

8.1.3 A summary of assessments of value and the impact of the proposed development without mitigation, and the residual significant effects following mitigation, is provided in the table below.

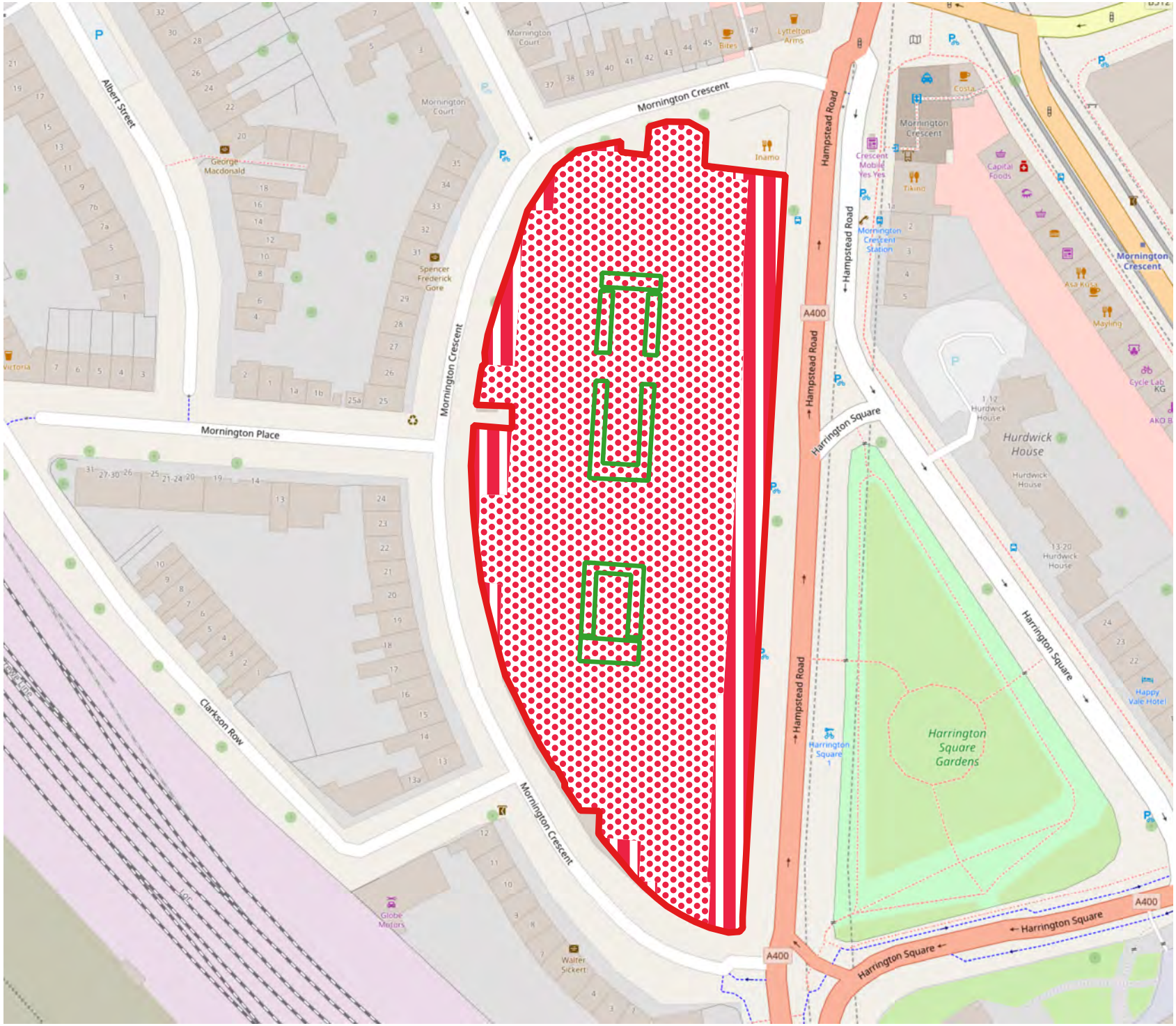
Feature	Level of value	Scale	Unmitigated impact	Confidence level	Mitigated impact
European Sites	Very High	European	Neutral	Certain	-
Sites of national importance	High	National	Neutral	Certain	-
Sites of local importance	Medium	County	Neutral	Certain	-
Habitats	Lower	Neighbourhood	Minor Adverse	Certain	Neutral
Veteran trees	Negligible	-	-	-	-
Plants	Negligible	-	-	-	-
Invertebrates	Negligible	-	-	-	-
Amphibians including great crested newts	Negligible	-	-	-	-
Reptiles	Negligible	-	-	-	-
Breeding birds	Negligible	-	-	-	-
Wintering birds	Negligible	-	-	-	-
Dormice	Negligible	-	-	-	-
Terrestrial mammals including badgers	Negligible	-	-	-	-
Aquatic mammals including water voles and otters	Negligible	-	-	-	-
Bats – Roosting in trees	Negligible	-	-	-	-
Bats – Roosting in buildings	Negligible	-	-	-	-
Bats – Foraging/commuting	Negligible	-	-	-	-

8.1.4 No further surveys are considered necessary at this stage.

8.1.5 The overall impact of the proposals is considered to be **Minor Adverse** in the absence of mitigation. The mitigated impact is considered to be **Neutral**, subject to the detailed layout.

8.1.6 The adoption of all or most of the enhancement measures detailed in Section 6 above would give rise to a **Minor Beneficial** impact, subject to the detailed layout.

Figures



Key

- Site boundary
- Building (B1) u1b5
- Developed land; sealed surface u1b
- Other green roof u1b5 89

L24417- Greater London House, Camden

Pre-development UK Habitat Classification Survey

Figure 01

Scale: 1:2000
December 2024

thelandscapepartnership

Building 1 – Greater London House
Southern and eastern elevations.
Photograph taken 03/12/2024.

Building 1 – Greater London House
Southern and western elevations.
Photograph taken 03/12/2024.

Building 1 - Greater London House
Western elevations and chimney.
Photograph taken 03/12/2024.

Building 1 – Greater London House
Easily accessible building on southern roof.
Photograph taken 03/12/2024.

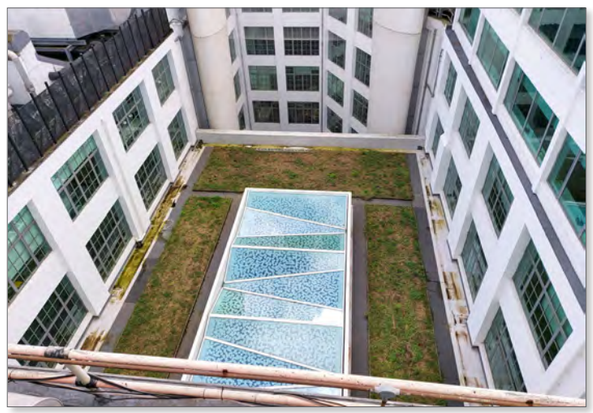
Building 1 – Greater London House
Eastern elevations.
Photograph taken 03/12/2024.

Building 1 – Greater London House
Level 6 roof, northern side metal pipes.
Photograph taken 03/12/2024.

Building 1 - Greater London House
Level 5 roof, southern side extractor fans and metal containers.
Photograph taken 03/12/2024.

Building 1 – Greater London House
Broken soffits on southern roof buildings.
Photograph taken 03/12/2024.

Building 1 – Greater London House
Northern green roof.
Photograph taken 03/12/2024.



Building 1 - Greater London House
Southern green roof.
Photograph taken 03/12/2024.

Building 1 – Graeter London House
Level 5 roof, southern side roof buildings.
Photograph taken 03/12/2024.

L24417- Greater London House, Camden

Photographs of Building

Figure 02

December 2024

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Appendix 1

Legislative and policy context

There is a number of pieces of legislation, regulations and policies specific to ecology which underpin this assessment. These may be applicable at a National or Local level. References to legislation are given as a summary for information and should not be construed as legal advice.

Birds Directive

The European Community Council Directive on the Conservation of Wild Birds (79/409/EEC), normally known as the Birds Directive, sets out general rules for the conservation of all naturally occurring wild birds, their nests, eggs and habitats. It was superseded by the 'new' Birds Directive (2009/147/EC) which generally updated the previous directive.

Since the end of the Brexit transition period on 31st December 2020 the Birds Directive no longer is part of the UK legal system.

Habitats Directive

The European Community Council Directive on the Conservation of Natural Habitats of Wild Fauna and Flora (92/43/EEC), normally known as the Habitats Directive, aims to protect the European Union's biodiversity. It requires member states to provide strict protection for specified flora and fauna (i.e. European Protected Species) and the registration and regulation of Special Areas of Conservation.

Since the end of the Brexit transition period on 31st December 2020 the Habitats Directive no longer is part of the UK legal system.

Conservation of Habitats and Species Regulations 2017

The Conservation of Habitats and Species Regulations 2017 generally follow the Birds Directive and Habitats Directive but unlike the Directives there is no role for the European Union; the UK Government has taken that role following the end of the Brexit transition period on 31st December 2020. For clarity, the following paragraphs consider the case in England only, with Natural England given as the appropriate nature conservation body. In Wales, the Countryside Council for Wales is the appropriate nature conservation body.

Special Protection Areas and Special Areas of Conservation are defined in the regulations as forming a national network of 'European sites'. The Regulations regulate the management of land within European sites, requiring land managers to have the consent of Natural England before carrying out management. Byelaws may also be made to prevent damaging activities and if necessary land can be compulsorily purchased to achieve satisfactory management.

The Regulations define competent authorities as public bodies or statutory undertakers. Competent authorities are required to make an appropriate assessment of any plan or project they intend to permit or carry out, if the plan or project is likely to have a significant effect upon a European site. The permission may only be given if the plan or project is ascertained to have no adverse effect upon the integrity of the European site. If the competent authority wishes to permit a plan or project despite a negative assessment, imperative reasons of over-riding public interest must be demonstrated, and there should be no alternative to the scheme. The permissions process in that case would involve the Secretary of State. In practice, there will be very few cases where a plan or project is permitted despite a negative assessment. This means that a planning application has to be assessed by the Local Planning Authority, based on information provided by the applicant, and the assessment must either decide that it is likely to have no significant effect on a European site or ascertain that there is no adverse effect upon the integrity of the European site.

Government policy is for Ramsar sites (wetlands of global importance) to be treated as if they were European sites within the planning process.

Appropriate Assessment

Appropriate Assessment is required in certain instances under the Conservation of Habitats and Species Regulations 2017. Regulation 63 says that:

> *63.— (1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which-*
>
> *(a) is likely to have a significant effect on a European site or a European offshore marine site*

(either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of that site,

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.

(2) A person applying for any such consent, permission or other authorisation must provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.

(3) The competent authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.

(4) It must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate.

(5) In the light of the conclusions of the assessment, and subject to regulation 64, the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).

(6) In considering whether a plan or project will adversely affect the integrity of the site, the authority must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which they propose that the consent, permission or other authorisation should be given.

Regulation 70 provides that Regulations 63 and 64 apply in relation to the grant of planning permission. Regulation 70(3) specifically addresses outline applications, saying that:

"*Where [Regulations 63 and 64] apply, outline planning permission must not be granted unless the competent authority is satisfied (whether by reason of the conditions and limitations to which the outline planning permission is to be made subject, or otherwise) that no development likely adversely to affect the integrity of a European site or a European offshore marine site could be carried out under the permission, whether before or after obtaining approval of any reserved matters*."

The tests under the Habitats Regulations are very strict. To exclude a likely significant effect under Regulation 63(1)(a) or to exclude an adverse effect on integrity under Regulation 63(5) a competent authority must be certain beyond a reasonable scientific doubt as to the absence of such effects.

Although not provided for under the Habitats Regulations, Government policy under paragraph 176(b) of the NPPF is for Ramsar sites (wetlands of global importance) to be treated as if they were European sites within the planning process.

The competent authority is typically the local planning authority, or an Inspector / Secretary of State for appeals. The appropriate assessment contains the information the council requires for the purposes of its assessment under the Habitat Regulations.

The Habitats Regulations also are applicable to local authority land use plans and policies. If a policy or plan is likely to have a significant effect upon a European site, the permission may only be given if the policy or plan is ascertained to have no adverse effect upon the integrity of the European site. This approach gives rise to a hierarchy of plans each with related appropriate assessments. For example, the appropriate assessment of a Regional Spatial Strategy will affect policies within a Core Strategy, which will then need its own appropriate assessment, and so on.

European Protected Species

European Protected Species of animals are given protection from deliberate capture, injury, killing, disturbance or egg taking/capture. Their breeding sites or resting places are also protected from damage or destruction, which does not have to be deliberate. A number of species are listed as European Protected Species, with those most likely to be considered in planning applications being bats, dormouse, great crested newt and otter. Natural England may give a licence for actions that are otherwise illegal, subject to them being satisfied

on the three tests of no alternative, over-riding public interest, and maintenance of the species in favourable condition.

European Protected Species of plant are also listed and given protection. These species are generally very rare and unlikely to be present in proposed development sites.

Wildlife and Countryside Act 1981

The Wildlife and Countryside Act 1981 has been amended many times, including by the Countryside and Rights of Way Act 2000. It contains provisions for the notification and regulation of Sites of Special Scientific Interest, and for protected species.

The Regulations regulate the management of land within Sites of Special Scientific Interest, requiring land managers to have the consent of Natural England before carrying out management.

All public bodies are defined as 'S28G' bodies, which have a duty to further the nature conservation of Sites of Special Scientific Interest in the undertaking of their functions. In practice, this prevents planning applications being permitted if they would harm Sites of Special Scientific Interest, as it would be a breach of that duty.

The Act makes it an offence intentionally to kill, injure, or take any wild bird, take, damage or destroy the nest of any wild bird, while that nest is in use or being built, or take or destroy an egg of any wild bird. Special penalties are available for offences related to birds listed on Schedule 1, for which there are additional offences of disturbing these birds at their nests, or their dependent young.

The Act makes it an offence intentionally to kill, injure or take any wild animal listed on Schedule 5, and prohibits interference with places used for shelter or protection, or intentionally disturbing animals occupying such places. Some species have lesser protection under this Act, for example white-clawed crayfish, common frog and toads are only protected from sale, and reptile species, other than smooth snake and sand lizard, are protected from intentional killing or injury, but they are not protected from disturbance and their habitat is not protected. It is also an offence intentionally to pick, uproot or destroy any wild plant listed in Schedule 8.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) dated December 2024 provides Government Policy in relation to nature conservation and planning as well as other matters.

Chapter 15 paragraph 187(d) of the NPPF says that the planning system should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.

Paragraphs 188 and 189 relate to policy for designated sites of biodiversity or landscape importance. Local Plan policies should distinguish between the hierarchy of international, national and locally designated sites and allocate land with the least environmental or amenity value and maintain and enhance networks of habitats and green infrastructure. Further policy is within paragraph 185, where Local Planning Authorities should to protect and enhance biodiversity within their Local Plans by:

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

When determining planning applications Local Planning Authorities should apply the following principles (paragraph 193):

- 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, 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;

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

Paragraph 194 adds protection to candidate sites of European or International importance (Special Protection Areas, Special Areas of Conservation and Ramsar sites) and also to those sites identified or required as compensatory measures for adverse effects on habitats sites, potential SPA, possible SAC listed or proposed Ramsar sites.

Paragraph 195 clarifies 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, i.e. a European 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.

Government circular 'Biodiversity and Geological Conservation – Statutory Obligations and their Impact Within the Planning System' referenced ODPM 06/2005 has not been replaced and remains valid. It sets out the legislation regarding designated and undesignated sites and protected species and describes how the planning system should take account of that legislation. It does however pre-date the NERC Act 2006 (see below), which includes a level of protection for a further list of habitats and species regardless of whether they are on designated sites or elsewhere.

Natural Environment and Rural Communities (NERC) Act 2006

This Act includes a list of habitats and species of principal importance in England. Local Authorities are required to consider the needs of these habitats and species when making decisions, such as on planning application.

Local Planning Authority's planning policy

The Local Planning Authority will have policies relating to biodiversity conservation.

Species Legislation

The following table provides an overview of legislation with regard to species.

Protected Species	Legislation			
	Wildlife & Countryside Act, 1981	**The Conservation of Habitats and Species Regulations, 2017**	**Natural Environment & Rural Communities (NERC) Act, 2006**	**Protection of Badgers Act, 1992**
Plants (certain 'rare' species)	✓	✓[13]	✓	
Invertebrates (certain 'rare' species)	✓	✓[14]	✓	
White-clawed crayfish	✓		✓	
Great crested newt, natterjack toad, pool frog	✓	✓	✓	
Other amphibians	✓[15]		✓	
Sand lizard, smooth snake	✓	✓[16]	✓	
Other reptiles	✓[17]		✓	
Breeding birds	✓	✓	✓	
Wintering birds (certain 'rare' species)	✓	✓	✓	
Bats	✓	✓	✓	
Dormouse	✓	✓	✓	
Water vole	✓		✓	
Otter	✓	✓	✓	
Badger				✓

[13] Nine species present in the UK, with very specialised habitat requirements, are European Protected Species.

[14] Fisher's estuarine moth, large blue butterfly and lesser whirlpool ram's-horn snail are European Protected Species.

[15] The four other native amphibian species (smooth and palmate newts, common frog and common toad) are only protected against trade under this act.

[16] Smooth snake and sand lizard are European Protected Species.

[17] The four other native reptile species (common lizard, slow worm, grass snake and adder) are protected against intentional killing, injury and trade under this act.

Appendix 2

Assessment Methodology: Valuing Ecological Features and Impact Assessment

The three-stage assessment method for determining ecological value is based upon assessment matrices published in the Handbook of Biodiversity Methods[18]. It has been updated to comply with recent changes to planning policy and legislation. The three-stage process allows the value of ecological sites, habitats and populations, and the magnitude of the impact, to be cross-tabulated to identify impact significance.

Valuing ecological sites, habitats and populations: scale and level of value

Scale	Level of value	Sites, habitats and populations
Greater than national	**Very High**	Statutory sites designated under international conventions or related national legislation, in particular: • Wetlands of International Importance (Ramsar sites), • Special Areas of Conservation, • Special Protection Areas.
National	**High**	Statutory sites designated under national legislation, for example: • Sites of Special Scientific Interest (England, Wales, Scotland), • National Nature Reserves (UK). Significant viable areas of habitats, or populations or assemblages of species of principal importance for the conservation of biodiversity in England and Wales (Section 41 species and habitats)[19] of such size and quality as might qualify for SSSI designation. Populations or assemblages of red-listed, rare or legally protected species, as might qualify for SSSI designation, for example: • species of conservation concern, • Red Data Book (RDB) species, • birds of conservation concern (Red List species), • nationally rare and nationally scarce species, • legally protected species.
County	**Medium**	Statutory sites of lower conservation value designated under national legislation, for example Local Nature Reserves (UK). Non-statutory sites designated under local legislation, for example: • County Wildlife Sites, • Local Wildlife Sites, • Roadside Nature Reserves (protected road verges). Viable areas of habitat or populations of species of principal importance for the conservation of biodiversity in England and Wales (Section 41 species and habitats)[20] of such size and quality as might qualify for designation at the county level. Other non-designated sites which meet the criteria for designation at this level.

[18] Hill, D., Fasham, M., Tucker, G., Shewry, M., Shaw, P. (eds.) (2005) *Handbook of Biodiversity Methods: Survey, Evaluation and Monitoring*, Cambridge University Press.

[19] Listed under S41 of the Natural Environment and Rural Communities Act 2006 http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx.

[20] Listed under S41 of the Natural Environment and Rural Communities Act 2006 http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx.

District / Borough[21]	**Lower**	Sites meeting criteria for metropolitan designations. Undesignated sites or features not meeting criteria for county designation, but that are considered to enrich appreciably the habitat resource within the local district or borough, for example: • ancient woodland, • diverse, ecological valuable and cohesive hedgerow networks, • significant clusters or groups of ponds, • veteran or ancient trees. Viable areas of habitat or populations of species of principal importance for the conservation of biodiversity in England and Wales (Section 41 species and habitats)[22] not qualifying for designation at the county level.
Parish / Neighbourhood	**Lower**	Areas of habitat considered to enrich appreciably the ecological resource within the context of the local parish. Small areas of habitat or populations of species of principal importance for the conservation of biodiversity in England and Wales (Section 41 species and habitats)[23].
Site only	**Negligible**	Ecological feature or resource not meeting any of the above criteria.

Note: there is much overlap in designations and lists of important species, and many sites, habitats and species appear on several. Where a site, habitat or species has multiple designations or levels of protection, normally the highest level would be the level at which impacts are assessed.

[21] Including metropolitan boroughs.

[22] Listed under S41 of the Natural Environment and Rural Communities Act 2006 http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx.

[23] Listed under S41 of the Natural Environment and Rural Communities Act 2006 http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx. Listed under S41 of the Natural Environment and Rural Communities Act 2006 http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx.

Definitions of impact magnitude

Magnitude (negative or positive)	Definition / trigger
Severe	Loss or severe degradation affecting over 75% of a site feature, habitat or population. Adverse change to, or reduced condition of, over 90% of a site feature, habitat or population, for example through disturbance or trampling.
Major	Loss or severe degradation affecting over 25% of a site feature, habitat or population. Adverse change to, or reduced condition of, over 50% of a site feature, habitat or population, for example through disturbance or trampling. For benefits, an impact equivalent in nature conservation terms to a gain of over 50% in a site feature, habitat or population.
Moderate	Loss or severe degradation affecting over 5% of a site feature, habitat or population. Adverse change to, or reduced condition of, over 10% of a site feature, habitat or population, for example through disturbance or trampling. For benefits, an impact equivalent in nature conservation terms to a gain of 10-50% in a site feature, habitat or population
Minor	Loss or severe degradation affecting up to 5% of a site feature, habitat or population. Adverse change to, or reduced condition of, 1-10% of a site feature, habitat or population, for example through disturbance or trampling. For benefits, an impact equivalent in nature conservation terms to a gain of up to 10% in a site feature, habitat or population.
Insignificant	No loss of or severe degradation to a site feature, habitat or population. Adverse change to, or reduced condition of, less than 1% of a site feature, habitat or population. No benefit to a site feature, habitat or population.

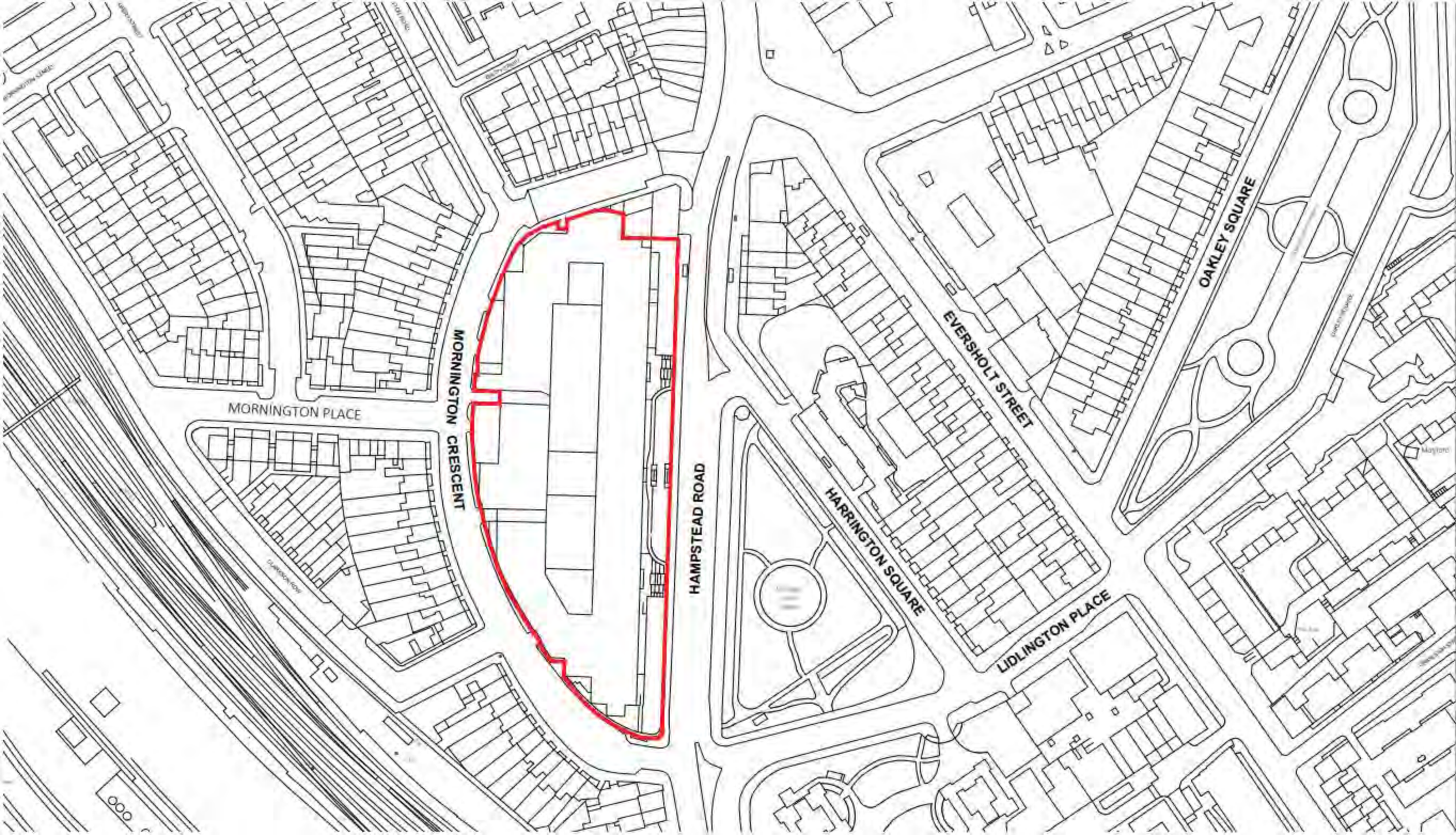
Impact significance

	Magnitude of impact							
Value of site, habitat or population	*Severe Negative*	*Major Negative*	*Moderate Negative*	*Minor Negative*	*Insignificant*	*Minor Positive*	*Medium Positive*	*Major Positive*
Very High	Severe Adverse	Severe Adverse	Major Adverse	Major Adverse	Neutral*	Major Beneficial	Major Beneficial	Major Beneficial
National (High)	Severe Adverse	Major Adverse	Major Adverse	Moderate Adverse	Neutral*	Moderate Beneficial	Major Beneficial	Major Beneficial
County/Metropolitan (Medium)	Major Adverse	Major Adverse	Moderate Adverse	Moderate Adverse	Neutral	Minor Beneficial	Moderate Beneficial	Major Beneficial
District/Borough (Lower)	Major Adverse	Moderate Adverse	Moderate Adverse	Minor Adverse	Neutral	Minor Beneficial	Moderate Beneficial	Moderate Beneficial
Parish (Lower)	Moderate Adverse	Moderate Adverse	Minor Adverse	Minor Adverse	Neutral	Minor Beneficial	Minor Beneficial	Moderate Beneficial
Minimal/negligible	Neutral	Neutral	Neutral	Neutral	Neutral	Minor Beneficial	Minor Beneficial	Moderate Beneficial

Where the impact significance falls below Minor Adverse, the term 'Neutral' is used.

*In some circumstances, some 'insignificant' impacts might fail legislative or policy tests and the impact would be greater than Neutral.

Appendix 3


MORNINGTON PLACE
MORNINGTON CRESCENT
HAMPSTEAD ROAD
HARRINGTON SQUARE
EVERSHOLT STREET
LIDLINGTON PLACE
OAKLEY SQUARE

Appendix 4

Key

- Existing Trees To Be Retained
- Proposed Trees
- Specimen Shrubs
- Raised Planters
  Powder coated steel raised planters eg. 3-5mm steel planters by IOTA Gardens Ltd. Finish and RAL colour TBC.
- 'Green Screen' Planting
  eg. Green screen hedging by Mobilane
- Green Wall Trellis System
  eg. Jakob stainless steel trellis system
- Limestone Paving
  eg. 600 x 400mm x 20mm 'Alexandria Etched', by All green
- Limestone Paving
  eg. 600 x 900mm x 30mm thick 'Zahra Beige Washed', by All green
- Porcelain Paving
  eg. 900 x 900 x 20mm large format porcelain paving, includes integrated pre-formed drainage gullies eg. 'Dapello Pocrcelain Paver' by Ryno systems

- Integrated Seating
  FSC certified timber bench seat tops integrated into raised planters / terrace walls
- Loose Furniture / Indicative Seating
- Proposed Pergola structures
  Lightweight steel pergola structures eg. Jakob canopy system
- Proposed Balustrade / Guardrails
  To match existing railings and Architectural metalwork. Refer to Architects for detail & specification
- Proposed Gates
  To match existing railings and architectural metalwork. Refer to Architects for detail & specification
- Proposed Steps
  Limestone treads and risers with handrails to match architectural metalwork
- (22.64) Existing Levels
- 23.60 Proposed Levels

Notes:

1. Roof structure, waterproofing, insulation and protective layers to Architect / Engineer's details and specification
2. All planting areas to include centralised automated irrigation system
3. Lighting design by others
4. Steps, railing and balustrades to Architect's design and specification
5. Intensive green roof planting build-up to include: drainage and reservoir layers, filter fleece and specialist lightweight substrate with leca mulch
6. Extensive green roof planting build-up to include: drainage & reservoir layers, filter fleece and specialist lightweight substrate

1:250@A1

0 5 10 15 20 25m

Revision	Number	By	Date

thelandscapepartnership
landscape architecture urban design environmental planning

Bedford	01234 261315	☐
Woodbridge	01394 380509	☐
London	020 7252 0002	☒
Norwich	01603 230777	☐

Project
Greater London House (GLH1)

Drawing
Landscape Masterplan

Job No.	L24417
Dwg. No.	L24417-TLP-PA01
Scale	1:250@A1
Drawn	AF
Checked	LW
Date	28-01-2025

Status
PLANNING

North

Appendix 5

Guidelines for assessing potential suitability of proposed development sites for bats

Source: Collins J (ed) (2023) Bat Surveys for Professional Ecologists Good Practice Guidelines. Bat Conservation Trust

Potential Suitability	Roosting habitats in structures	Potential flight paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices / suitable shelter at all ground / underground levels)	No habitat features on site likely to be used by any commuting or foraging bats at any time of year (i.e. no habitats that provide continuous lines of shade / protection for flight lines or generate / shelter insect populations available to foraging bats.
Negligible[24]	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.	No obvious habitat features on site likely to be used as flight paths or by foraging bats; however a small element of uncertainty remains in order to account for non-standard bat behaviour.
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[25], 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 bats[26]).	Habitat that could be used by small numbers of bats as flight paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[45] 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).	Continuous habitat connected to the wider landscape that could be used by bats for flight paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions[45] and surrounding habitat. These structures have the potential to support high conservation status roosts e.g. maternity or classic cool / stable hibernation site.	Continuous, high quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland.

[24] 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.

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

[26] 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 (Korsten et al 2016 and Jansen at al 2022). Common pipistrelle swarming has been observed in the UK (Bell 2022 and Tomlinson 2020) and winter hibernation of numbers of this species has been detected at Seaton Delavel Hall in Northumberland (National Trust 2018). 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.

Appendix 6

eCountability
Managing your biodiversity risks and opportunities

In Partnership with

GiGL Greenspace Information for Greater London CIC
the capital's environmental records centre

THIS SUMMARY PAGE MAY BE PUBLISHED
THE FULL REPORT AND MAPS MAY NOT BE PUBLISHED IN THE PUBLIC DOMAIN

Ecological Data Search 25795dr - Summary Page

A 2000m ecological data search was carried out for site Greater London House, Camden on behalf of The landscape Partnership on 04 Dec 2024.

The following datasets were consulted for this report:

- Statutory sites ✓
- Non-statutory sites ✓
- Non-statutory sites (Proposed) ✓
- Protected species ✓
- London invasive species ✓
- Notable Thames Structures ✓
- Habitats ✓
- Open space ✓

Results

Statutory sites	No statutory sites and 4 LNRs
Non-statutory sites	
SINCs	36 SINCs
Proposed SINCs	None present within search area
Areas of Deficiency	Not present within search area
Geological sites	None present within search area
Species	
Protected and notable species	21584 species records
London invasive species	2645 species records
Notable Thames Structures	Not present within search area
Habitats	
BAP habitat suitability	Present within search area
Open space	Present within search area

The report is compiled using data held by GiGL at the time of the request. Note that GiGL does not currently hold comprehensive species data for all areas. Even where data is held, a lack of records for a species in a defined geographical area does not necessarily mean that the species does not occur there.

Permission
This data search report is valid until 04/12/2025 for the site named above.

Prepared by
04 Dec 2024