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7-15 Whitfield Street, London, W1

Ecological Appraisal

C2764_03b

Quality Assurance – Approval Status

This document has been Prepared and checked in accordance with
Waterman CPM's IMS (BS EN ISO 9001: 2000 and BS EN ISO 14001: 2004)

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APPENDIX

Appendix 1	Email comments on a previous Planning Application (Ref: 2005/2739/P) from Moira Cash, Principal Nature Conservation Officer for the London Borough of Camden
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PLAN

Habitat Features (including Crabtree Fields)
(2764_01b 02/06 JA/MP)



Summary

- S1 This report, prepared by Waterman CPM Ltd (WCPM) on behalf of Artesian Property Partnership Ltd, sets out the findings of an update ecological appraisal of a site at 7 – 15 Whitfield Street, London W1, hereafter referred to as 'the site'.
- S2 Two planning and conservation area consent applications to redevelop the site were submitted in 2005 and 2006 but was refused, one of which is still to be determined by the Planning Inspectorate. This update ecological appraisal assesses a new application to be submitted in 2007.
- S3 The proposed development site is currently of negligible value as an ecological resource, it comprising of buildings and hardstanding with no vegetation or obvious opportunities for wildlife. Wildlife interest within the zone of influence of the proposed development is restricted to Crabtree Fields, an area of open space situated adjacent and to the north of the site.
- S4 Crabtree Fields is not subject to statutory or non-statutory protection on account of its nature conservation importance, it comprising planted trees, including mature London planes, amenity grassland and other predominantly ornamental, intensively managed vegetation of little inherent ecological value. However, the open space is known to provide roosting, foraging and nesting habitat for two bird species of conservation concern, namely house sparrow (*Passer domesticus*) and starling (*Sturnus Vulgaris*), both of which have declined in recent years. The house sparrow is the subject of conservation action, it being identified in both the London and Camden Biodiversity Action Plans (BAP). In the context of the local surroundings, which are identified in the Revised Deposit UDP as being within a nature conservation deficiency area, Crabtree Fields is therefore of some value as a resource for wildlife and also as an amenity for residents and office workers.
- S5 The development has been designed to minimise potential adverse ecological impacts and to maximise the biodiversity potential of both the site and Crabtree Fields.
- S6 The new development will include exemplars of ecological design as recommended in design guidance for London, including 'extensive' green roofs (to encourage wildflowers and invertebrates upon which birds can feed). The northern site boundary, which is of importance to house sparrow in particular, will be retained and enhanced to allow further growth of climbing vegetation, thereby providing additional cover for important bird species and retaining dark, secluded areas within the adjacent open space at night. With the financial contribution proposed by the developer, the value of Crabtree Fields to nesting and roosting birds, and other wildlife, can be enhanced.
- S7 Provided the mitigation and enhancement strategy, devised in accordance with local BAP objectives, is implemented then the proposed development is not likely to result in unacceptable adverse impacts to local biodiversity at Crabtree Fields. Indeed, it is considered likely that opportunities for local wildlife would be improved, with the potential of ecological enhancements (notably the green roof) to provide benefits to species not already present in the area.



- S8 It is concluded that the proposed development would be in accordance with relevant planning policy with respect to nature conservation issues and would assist in delivering local BAP objectives.



Section 1 Introduction

- 1.1 This report, prepared by Waterman CPM Ltd (WCPM) on behalf of Artesian Property Partnership Ltd, sets out the findings of an update ecological appraisal of a site at 7 – 15 Whitfield Street, London W1, hereafter referred to as 'the site'.

Background

- 1.2 A planning application (planning application Ref: 2005/2739/P) and conservation area consent application (Ref: 2005/2742C) were submitted to the London Borough of Camden on behalf of Artesian Property Partnership in June 2005 for the redevelopment of Numbers 7-15 Whitfield Street. It was proposed to redevelop the site, which comprises a disused former electricity sub-station with associated offices and hardstanding. An ecological appraisal report prepared by WCPM (Ref. C2764_03a) was submitted with the application.
- 1.3 In September 2005 the London Borough of Camden refused the applications, but not on ecological grounds. Subsequently the application was successfully appealed but this decision was 'challenged' and has yet to be finally re-determined by the Planning Inspectorate.
- 1.4 Whilst not cited as a reason for refusal, the London Borough of Camden's ecologist, Moira Cash, recommended that the previous application be refused on the grounds that the size and nature of the proposed development would result in an impact to the wildlife, specifically the birdlife, at Crabtree Fields (see correspondence at **Appendix 1**). A further similar planning application (ref: 2006/0242/P) and conservation area application (ref: 2006/0245/C) was submitted in January 2006 and refused permission, in part, on similar grounds.
- 1.5 A new revised application, which forms the subject of this appraisal, is to be submitted for similar development of the site, but with minor alterations to the position of the proposed building and building massing to reduce visual and over shading effects on Crabtree Fields.
- 1.6 Full details of the planning history and the new application are included in the Planning Statement (October 2007) prepared by Barton Willmore.

Scope of Report

- 1.7 The purpose of this update ecological appraisal is to:
- Describe and evaluate the habitats present within the site and in adjacent areas that could be affected by the development proposed in the new application;
 - Assess the possible ecological constraints to development and make recommendations for mitigation and enhancement opportunities;



- In response to the concerns of the London Borough of Camden's ecologist (referred to above) with regard to the previous application, assess the likely affects to the wildlife interests at Crabtree Fields; and
- Assess the consequences in relation to national and local policy.



Section 2 Methodology

Background Data Searches

- 2.1 A background data search was undertaken in 2005, 2006 and updated in 2007. The search was for an area of 2km radius centred on the site. Obtaining existing records is an important part of the evaluation process, as it provides additional information that may not be apparent during a site survey, which by its nature provides only a snapshot of the ecology of the site.
- 2.2 The following organisations and individuals have been contacted and, where relevant, the information provided has been incorporated with acknowledgement within this report:
- London Borough of Camden (Moirá Cash);
 - English Nature (London Team);
 - Greenspace Information for Greater London;
 - Environment Agency (North East Area Team);
 - Amphibian, Reptile and Mammal Conservation Limited;
 - Ornithological Recorder (A Self Esq); and
 - Botanical Society of the British Isles (BSBI).
- 2.3 Other literature referenced in the report includes:
- Natural England's Natural Area Profile;
 - London Borough of Camden Replacement UDP (adopted June 2006);
 - The UK, London and Camden Biodiversity Action Plans (BAP); and
 - White Young Green Environmental *Design for Biodiversity. A Guidance Document for Development in London.*
- 2.4 This consultation exercise is valuable in identifying past records and nature conservation designations. Reference to the Natural England's Natural Area Profile provides local context for the site. Understanding nature conservation issues within the wider area helps in the assessment of the value of a site and the habitats and species that it supports.
- 2.5 Where applicable, information from the above sources has been incorporated into this report with due acknowledgement.



Field Survey

- 2.6 The site was surveyed on 14th November 2005 using a technique based upon Phase I survey methodology as recommended by NE (Nature Conservancy Council, 1990). This Phase I technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey. Any such areas identified can then be examined in more detail at a later date. Note was also taken of any evidence of, or potential for, protected fauna.
- 2.7 At the time of survey not all vegetation would have been visible, however, it is considered that sufficient information was available in order to evaluate the ecological resources present.
- 2.8 As part of this update assessment of the ecological resources of the site, the London Borough of Camden's ecologist (Moirá Cash) was consulted with regard to the need for an update survey in 2007 to re-assess the ecological resources of the site and Crabtree Fields. On the basis of recent visits to Crabtree Fields by Ms Cash it was agreed that there was no need to undertake an update survey in 2007, provided an update data search, as described above, was undertaken to confirm that no new issues required specific consideration.

Evaluation

- 2.9 The habitats and species evaluations are based on the guidance from the Institute of Ecology and Environmental Management (IEEM).
- 2.10 The level of value of specific ecological receptors is assigned using a geographic frame of reference, i.e. international value being most important, then national, regional, county, district, local and lastly, within the immediate ZOI of the proposals only.
- 2.11 Value judgements are based on various characteristics that can be used to identify ecological resources or features likely to be important in terms of biodiversity. These include site designations (such as Sites of Specific Scientific Interest (SSSI)), or for undesignated features, the size, conservation status (either locally, nationally or internationally), and the quality of the ecological resource. In terms of the latter, 'quality' can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.



Section 3 Baseline Information

Site Context

- 3.1 With the exception of the northern boundary, the site is bounded by residential dwellings and shops with associated small private gardens. Adjacent and to the north lies a small park, Crabtree Fields.
- 3.2 The site lies within the NE defined London Basin Natural Area (No.66). The London Basin is characteristically underlain by chalk, with a thick layer of overlying London Clay and superficial drift deposits comprising sands, gravels and clay.
- 3.3 The landscape of the London Basin comprises semi-natural habitat associated with pastoral agricultural systems as well as highly fragmented urbanised habitats, particularly within London. Whilst wildlife rich habitats within this Natural Area are chiefly associated with the agricultural systems and former industrial land uses, some highly urbanised habitats are also valued, particularly within the capital city. Many such areas are fragmented and transitory. Despite the built up nature of inner London, the private gardens and areas of open space support an ecology that is of value within the context of the London Basin.

Designated Sites

- 3.4 There are no statutorily protected sites (such as SSSIs) within 2km of the site¹.
- 3.5 Non-statutory sites of nature conservation importance in London are identified by the Greater London Authority Biodiversity Group and are subject to protection under UDP policy (see Section 4). Sites are known as Sites of Importance for Nature Conservation (SINCs) and are subdivided into three tiers according to their relative importance: Sites of Metropolitan Importance (SMIs) are of greatest value, followed by Sites of Borough Importance (SBIs – these are further divided into grades 1 or 2) and Sites of Local importance (SLIs), respectively.
- 3.6 The site is not covered by, or immediately adjacent to, any non-statutory designations. The nearest non-statutory sites are:
 - Russell Square SLI – approximately 500m north east of the site. A large square containing amenity grassland, planted shrubbery and mature trees;
 - Gordon Square SLI – approximately 600m north east of the site. A well-used square comprising amenity grassland, planted shrubbery and scattered trees; and
 - Phoenix Community Gardens SLI - approximately 600m to the south east of the site. A small 'ecology garden' amongst tall buildings, managed by volunteers. Habitats present include an open meadow area, a rockery, shrubberies, a pond, trees and native wildflower beds.

¹ 2km radius search of MAGIC centred on OSGR TQ295817



- 3.7 Owing to the scale of the proposed development and the respective distances from the site, none of these valued areas are considered likely to be affected, hence these are not considered further within this report.

Site Habitats

- 3.8 Site habitats and key features are illustrated on **Plan 2764/01b**, attached to this report.
- 3.9 The development site comprises of a 1950s building, formerly an electricity substation. The building is of varying height, it being nearly four storeys high where it fronts on to Whitfield Street with a two 'commercial' storey element to the rear (equivalent to three 'residential' storeys). The building is brick built with flat, felted roofs.
- 3.10 The site supports negligible vegetation as such. The building and associated hardstanding supports no obvious opportunities for wildlife, such as bats or nesting birds.

Crabtree Fields Habitats

- 3.11 This is a small park situated adjacent to the northern boundary of the site, just off Whitfield Street, with residential, office and shop developments surrounding on all sides.
- 3.12 The park is intensively managed as a public amenity, with park benches, paved or tarmaced walkways and a children's play area. With the exception of the area fronting Whitfield Street, the park is enclosed within fencing that is locked at night.
- 3.13 In terms of vegetation there are mature London plane trees *Platanus x hispanica* adjacent to Whitfield Street with occasional locust tree *Robinia* sp. along Colville Place. Semi-mature ornamental fruit trees are planted within the park. Vegetation within the park is generally well manicured with close mown amenity grassland comprising rye grass *Lolium* sp. and tidy shrub borders supporting ornamental varieties of conifer *Cypressus* sp., box *Buxus* sp., rose *Rosa* sp. and spurge *Euphorbia* sp. The shrub borders are maintained tidy and mulched with wood chippings, preventing development of ground flora and hence limiting opportunities for wildlife. Beech *Fagus* sp. and privet *Ligustrum* sp. hedges are also present. A pergola supports climbing vegetation, primarily *Wisteria*, but with other ornamental vine species.
- 3.14 There is little in terms of semi-natural vegetation, with the exception of the boundary wall and chain link fence that separates the site from the park. This area supports dense ivy *Hedera helix* growth and occasional shrubs including elder *Sambucus nigra* and rowan *Sorbus aucuparia*. Occasional grasses have gained a foothold in the compacted hoggin material beneath some of the planted fruit trees.
- 3.15 The park habitats are illustrated on Plates 1 and 2, over the page.



Plate 1. Crabtree Fields viewed from the south, from the roof of the site. The pergola with climbing vegetation is to the right of the picture. The shared boundary supporting dense ivy and shrubs is visible in the foreground. The fruit trees occupy the centre of the picture.

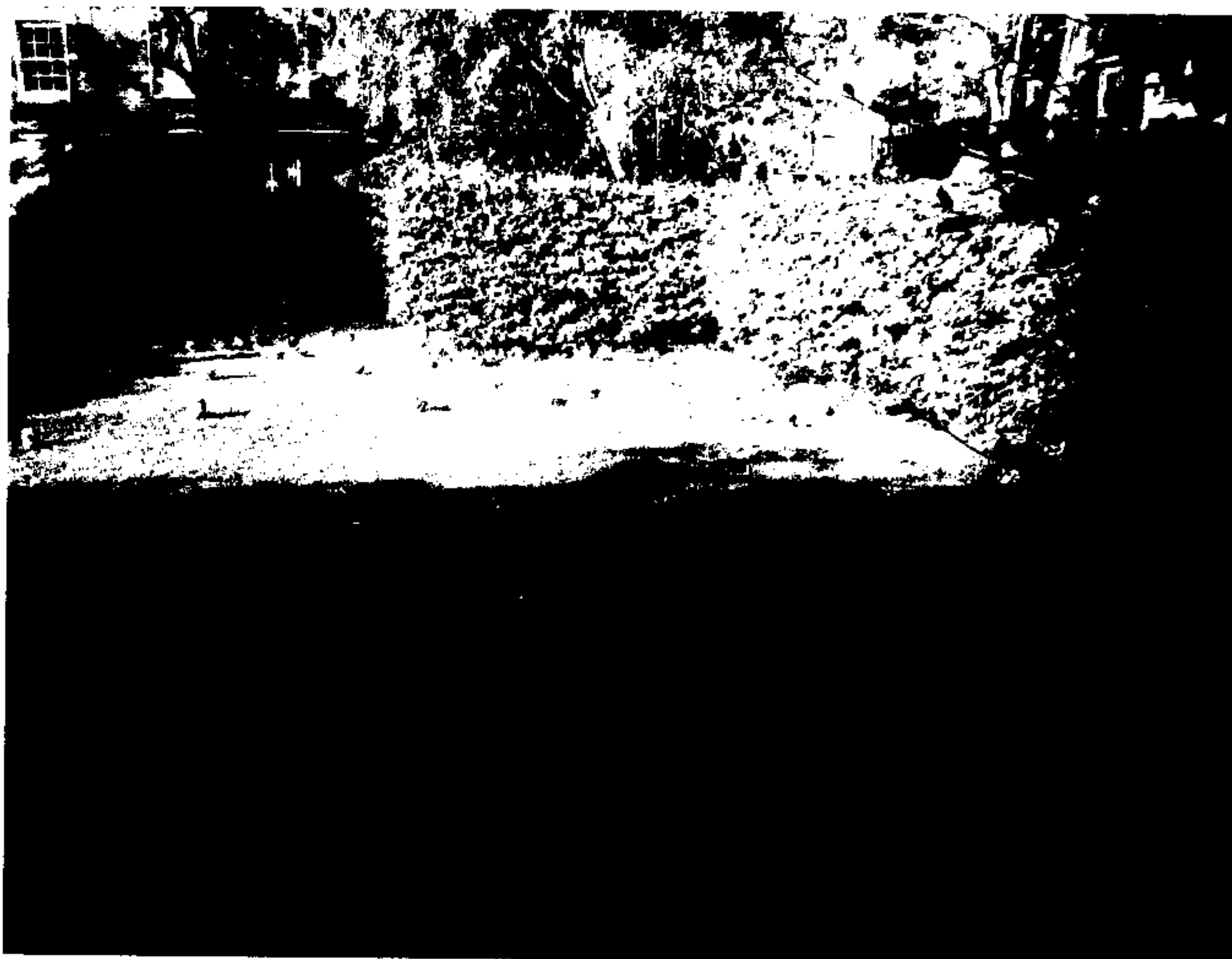


Plate 2. Crabtree Fields, illustrating the manicured ornamental shrub beds and hedgerows, together with amenity grassland. Several feral pigeons *Columba livia* can be seen foraging on the amenity grassland.



Fauna

Birds

- 3.16 The site and associated buildings are considered to be of negligible value to birds, with no vegetation or obvious potential nest sites present.
- 3.17 Information supplied by Greenspace Information for Greater London (GIGL) indicates that the nearest record of black redstart *Phoenicurus ochruros*, a species specially protected under British legislation and known to be prevalent in central London, is 410m to the west of the site. The London Bird Report indicates that there are also records approximately 2km to the north at Kings Cross Station. However with no obvious nest sites or obvious foraging habitat on site, the presence of this species is considered unlikely.
- 3.18 Several house sparrows *Passer domesticus* were recorded during the survey of Crabtree Fields, with most activity within dense ivy and shrubs along the shared boundary with the site. Several starlings *Turdus vulgaris* were also recorded. Both species are on the 'red list'², having declined significantly in recent years. The house sparrow is also the subject of specific conservation action in the London and Camden BAPs. The Camden Borough ecologist considers Crabtree Fields to be of importance to both species in the Borough (see **Appendix 1**), with the ivy covered wall on the boundary between the site and Crabtree Fields being of particular importance to nesting and roosting sparrows (*Moir Cash, pers. comm.*). However, the value of Crabtree Fields to these and other species could be improved relatively easily if the current intensive management was relaxed, more native species were planted and use of mulching ceased in order to allow ground flora to establish, flower and set seed.
- 3.19 Other common bird species recorded at Crabtree Fields during the survey include blue tit *Parus caeruleus* and feral pigeon, neither of which are protected or of conservation concern.

Bats

- 3.20 GIGL holds a number of records of bats within 2km of the site. The nearest of these was recorded approximately 550m to the north west of the site in 1993 although the species was not noted. Pipistrelle *Pipistrellus* sp. bats have also been recorded within 1km of the site and other bat species including Daubentons *Myotis daubentoni*, Noctule *Nyctalus noctula* and Brown Long-Eared *Plecotus auritus* have been recorded within 2km of the site³.
- 3.21 The site is not likely to support roosting bats owing to the nature of the building construction, with no obvious crevices or voids present. The residential buildings in the locality are more suited to bat roosting however whilst the vegetation within Crabtree Fields is likely to support invertebrate prey for bats, the relative isolation of the open space from similar habitat, coupled with high ambient light levels and disturbance reduces the likelihood that bats are present in the area.

Other

- 3.22 The site, or Crabtree Fields, is not considered likely to support other notable or legally protected species.

² Gregory, R.D., Wilkinson, N.I., Noble, D.G., Robinson, J.A., Brown, A.F., Hughes, J., Procter, D.A., Gibbons, D.W. and Galbraith, C.A. (2002). The population status of birds in the United Kingdom, Channel Islands and Isle of Man: an analysis of conservation concern 2002-2007. *British Birds*, 95: 410-450.

³ London Bat Group and GIGL records.



- 3.23 Common invertebrates upon which the identified birds would feed are likely to be present at Crabtree Fields, although the number of species and their abundance is likely to be limited by the intensive management of the park. That said, a range of invertebrates, including nectar and pollen feeding species, would be expected to use the park and surrounding private gardens.

Evaluation

- 3.24 Site habitats offer no obvious opportunities to wildlife and hence are considered to be of **negligible** value.
- 3.25 In terms of Crabtree Fields, it is considered that, with the exception of the trees, which are considered to be of **local** value, the predominantly ornamental, intensively managed vegetation is of little inherent ecological value. However, the park provides roosting, foraging and nesting habitat for two bird species of conservation concern, namely house sparrow and starling, both of which have declined in recent years. The house sparrow is the subject of conservation action, it being identified in both the London and Camden BAP. In the context of the local surroundings, which are identified in the Camden UDP as being within a nature conservation deficiency area, Crabtree Fields is therefore of some value as a resource for wildlife and also as an amenity for residents and office workers. It is therefore considered to be of up to **district** value.



Section 4 Relevant Planning Policies and Guidance

National Policy

- 4.1 The relevant adopted policy at the national level is set out in Planning Policy Statement 9: Biodiversity and Geological Conservation (PPS9) (2005) and is central Government's guidance on nature (and geological) conservation. It sets out the key principles of ensuring that the potential impacts of planning decisions on biodiversity and geological conservation are fully considered. These include:
- The need for up-to-date assessments;
 - The aim of maintaining and enhancing, restoring or adding to biodiversity and geological conservation interests;
 - The need to take a strategic approach to the conservation, enhancement and restoration of biodiversity and geology; and
 - The principle of planning decisions should be to prevent harm to biodiversity and geological conservation interests and this may include consideration of mitigation/compensation measures, implemented where appropriate using planning controls.
- 4.2 PPS9 provides guidance as to the protection of statutorily designated sites, including international sites, National Nature Reserves (NNR) and SSSIs, as well as non-statutory regional and local sites. PPS9 also addresses development and wildlife issues outside these sites and seeks to ensure that planning policies minimise any adverse effects on wildlife.
- 4.3 PPS9 places emphasis on local authorities to further the conservation those habitats of principal importance, or those habitats supporting species of principal importance, which are identified in Section 74 of the Countryside Rights of Way (CRoW) Act 2000.
- 4.4 PPS9 requires that adverse effects of development on species of principal importance should be avoided through planning conditions or obligations and that planning permission should be refused where harm to these species, or their habitats, may result unless the need for, and benefits of, the development clearly outweigh the harm.
- 4.5 PPS9 requires that opportunities for improving biodiversity within developments should be maximised. It states that development proposals provide many opportunities for building-in beneficial biodiversity features as part of good design and also suggests that networks of natural habitat should be protected and repaired, and the fragmentation and isolation of natural habitats avoided.



The London Plan

- 4.6 The proposed development is subject to policy 3D.12 relating to nature conservation issues:

“Biodiversity and Nature Conservation – the Mayor’s Biodiversity Strategy aims to ensure protection, promotion and management of London’s biodiversity. Planning of new developments should include provisions for positive gains for nature conservation and should aim to achieve targets in BAPs. Protection would be provided to identified sites of nature conservation importance such as Sites of Metropolitan Importance (SMIs) and Sites of Borough Importance (SBIs). Applications would be resisted where such sites would be adversely impacted or appropriate compensation would be sought.”

London Borough of Camden Replacement UDP (adopted June 2006)

- 4.7 Policy N5 relates to biodiversity and states that:

“In assessing planning applications, the Council will expect development schemes to have considered conserving and enhancing biodiversity, including by creating wildlife habitats.”

- 4.8 Policy N6 relates to nature conservation sites and is split into two parts A and B which state:

“A - Designated nature conservation sites The Council will not grant planning permission for development that it considers would cause harm to Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) and Sites of Nature Conservation Importance (SNCI), as shown on the Proposals Map.

B - Areas deficient in nature conservation sites The Council will seek the creation of new nature conservation sites in areas identified on Map 3: Nature Conservation Deficiency.”

- 4.9 Policy N7 relates to protected species and their habitats and states:

“The Council will not grant planning permission for development that it considers would harm the following species and their habitats:

- a) legally protected species; and**
- b) species in the National, London and Camden Biodiversity Action Plans (BAPs) that are uncommon, declining or under threat.”**

Biodiversity Action Plans (BAPs)

- 4.10 Following The Convention on Biological Diversity (1992), the UK BAP was published in 1994 to guide national strategy for the conservation of biodiversity through Species Action Plans (SAPs) and Habitat Action Plans (HAPs), which set conservation targets and objectives. Most areas now possess a local BAP to complement the national strategy where priority habitats and species are identified and targets set for their conservation. BAPs are the key nature conservation initiative in the UK, working at national, regional and local levels.
- 4.11 The London BAP (LBAP) is the region's response to the UK's National BAP, with the Camden BAP acting at a more local level.



- 4.12 The following HAPs and SAPs are considered relevant to the site and have been instrumental in the design of mitigation and enhancement strategies. Pertinent actions from each HAP and SAP are also listed.

Bats (London and Camden BAP)

- Increase the number and quality of feeding sites for bats within the Borough; and
- Increase the number of bat roost sites across the Borough e.g. bat boxes, brick houses, and preservation of old trees.

House Sparrow (London and Camden BAP)

- Encourage land managers including schools to retain potential natural nest sites for House Sparrows; and
- Encourage land managers to plant appropriate herbaceous and woody species for food and nesting.

Black Redstart (Camden BAP)

- To promote good practice where development is liable to impact black redstart populations. One action is to promote the black redstart website (www.blackredstarts.org.uk), which contains recommendations for novel development design to encourage this species.

The Built Environment (Camden BAP)

- Promote the use of artificial habitats e.g. bird boxes, greening of vertical surfaces, in areas where 'natural' habitat is lacking.

Small Parks, Gardens and City Squares (London and Camden BAP)

- Identify at least four sites where native wildflowers, trees, shrubs and hedgerows can be planted, appropriate to the conditions and character of the site;
- Work with contract managers to ensure that biodiversity considerations are incorporated into any new maintenance contracts and that staff are trained appropriately;
- Plant more holly and ivy, where appropriate;
- Introduce more nectar plants into formal flower beds and investigate the creation of butterfly garden areas where appropriate;
- Identify sites where shrubbery areas will be targeted to enhance their value as habitat for birds, i.e. variety of structure and species; and
- Investigate the possibility of a bird and bat box scheme within specified small parks and city squares.



Section 5 Potential Impacts, Mitigation and Enhancements

The Proposed Development

- 5.1 The new application is described in detail in the planning statement prepared by Barton Willmore. In summary, this comprises of a slightly smaller building massing than proposed in previous applications, with the location of the building also moved slightly.
- 5.2 As with the previous application, the building is designed so as to provide new wildlife habitats in line with best practice and the Camden BAP, together with financial provision that could be used to enhance the wildlife and amenity value of Crabtree Fields.
- 5.3 The proposals previously involved the removal of the existing boundary wall separating the site from Crabtree Fields, which has been identified as being of importance to the local house sparrow population. This wall, and the ivy covering it, would now be retained.

Potential Impacts and Mitigation

- 5.4 The site is of negligible ecological value and hence there are no concerns regarding impacts to wildlife within the site.
- 5.5 However, as summarised in Section 1, the London Borough of Camden ecologist raised concerns with respect to a previous application and possible off-site impacts to the habitats and fauna utilising Crabtree Fields (see correspondence at **Appendix 1**). These potential impacts are listed below, together with further possible adverse effects and the strategy to mitigate these. Measures to enhance the ecological value of the site described thereafter.

Shading Effects

- 5.6 The existing building is situated to the south of Crabtree Fields and hence already results in shading of the park, with the extent of shading dependent on the season. The Sunlight and Daylight report⁴ indicates that (at 12 noon on 21st March) the increased height of the proposed new building will result in a slight increase in extent and duration of shading of Crabtree Fields, although all of the park will continue to receive sunlight at some time during the day. However, the slightly smaller building proposed in the new application will result in a slight decrease in overshading when compared with the previous, refused application.
- 5.7 The local authority ecologist raised concerns that increased shading would result in detrimental effects to habitats and fauna, particularly the identified bird interest at Crabtree Fields.

⁴ Produced by Schatunowski Brooks, June 2007



- 5.8 A reduction in the duration of direct sunlight can affect growth rates and survivability of some plant species, although some species present in the park, such as ivy, are adapted to a shaded habit. That said, given the park, particularly the southern part, is already subject to some shading, it is considered unlikely that the slight increase in shading would obviously affect the existing, predominantly ornamental, vegetation at Crabtree Fields.
- 5.9 House sparrows using the Crabtree Fields appear to favour the dense ivy vegetation on the northern site boundary. This area is likely to be favoured as it provides the best cover and nesting opportunities, but it is already very heavily shaded. It is therefore unlikely that additional shade will deter sparrows from using this vegetation. Similarly, starlings use Crabtree Fields for roosting and some foraging and it is considered unlikely that they would be significantly affected.
- Increased Disturbance to Wildlife at Night**
- 5.10 There are concerns that replacement of the existing unlit and disused building with residential and offices would increase disturbance to wildlife within Crabtree Fields, specifically in relation to ambient light levels and noise. In addition, the increased glazing on the new building could result in increased bird collisions with windows.
- 5.11 Crabtree Fields is within an urban area with residential development and street lighting surrounding it on all but the southern side, adjacent to the site. The site is currently not lit and hence there are likely to be darker areas at the southern part of Crabtree Fields. There is therefore the possibility that light levels will increase slightly in this area as a result of the development, comprising residential and office uses above ground level, since it is proposed to have glazing in the wall facing the park. There is also likely to be more movement and noise compared to the existing situation, although not within Crabtree Fields itself.
- 5.12 Whilst the birds using Crabtree Fields are likely to be habituated to light and noise, an increase could discourage some from using the site.
- 5.13 In order to avoid such potential impacts, as stated above, it is proposed to retain the boundary wall and associated vegetation, and to encourage further climbing vegetation, (such as ivy, which is well suited to such shaded conditions) within the site boundary to cover the wall and the fence, thereby screening some of the light from entering the site and retaining darker areas. This would also screen some movement disturbance and could reduce noise levels from the site. The vegetation would be planted and managed to maximise the screening effect.
- 5.14 A financial contribution would be made in order that a range of bird boxes can be erected in Crabtree Fields at appropriate locations. In line with local BAP objectives, boxes could be chosen to provide nesting habitat for house sparrows and other species known in the vicinity. Improved management of existing vegetation and additional planting for wildlife could also be undertaken using the financial contribution.
- Other Potential Impacts**
- 5.15 Construction works could result in disturbance to nesting birds, all British species (bar a few pest species) being protected by British legislation. Whilst such impacts are unlikely during works to the building at the site, any works to the northern boundary wall and associated vegetation could disturb active nests.



- 5.16 It is therefore recommended that demolition or vegetation clearance where these could disturb active nests are undertaken outside of the bird nesting season (March to August inclusive), unless a prior survey by a suitably qualified ecologist identified no active nests present.

Ecological Enhancement Strategy

- 5.17 Whilst Crabtree Fields is acknowledged as being of some value to wildlife, particularly birds, its value could relatively easily be increased through simple enhancements to the vegetation and its management. The developer has committed to providing a financial contribution which could fund the outline enhancement strategy below, the detail of which can be worked up in consultation with the local park user group. The broad principles for enhancement of the park set out below draw on published best practice for development in London⁵ and local BAP objectives identified in Section 2.
- Plant native species of wildflowers, shrubs and trees. This would provide nectar and fruit sources for insects and birds. Shade tolerant species found in woodland locations could be used in the southern, more shaded area of the park, including climbing species such as ivy, and others such as holly, to provide additional bird habitat;
 - Whilst the park should continue to be managed in a formal manner, appropriate for its location and current use, management could be more sympathetic to wildlife. Some of the management principles used at the nearby Phoenix Community Gardens SLI (see paragraph 3.6 above) could be adopted. For instance, use of mulch could be ceased to allow wildflowers and ivy, of value to invertebrates and hence birds, to establish; and
 - Erect bird nest boxes, including sparrow boxes, and bat boxes within Crabtree Fields.
- 5.18 In addition, the proposed new building has been designed with wildlife interests in mind. The flat roofs of the residential section of the new building will support green roofs, comprising a nutrient poor substrate to encourage a diverse assemblage of ruderal flowering plants. This in turn will encourage a range of invertebrates and birds, including house sparrow and potentially black redstart, a species unlikely to use the site or Crabtree Fields at present. Green roofs are identified as best practice in biodiversity design in London and their provision will go some way towards local BAP objectives².

Delivery of the Ecological Mitigation and Enhancement Strategy

- 5.19 The detail of the mitigation and enhancement strategy could be worked up and the implementation secured through appropriately worded planning conditions or other forms of planning control.

⁵ *Design for Biodiversity; A Guidance Document for Development in London.* White Young Green Environmental



Section 6 Conclusion

- 6.1 The proposed development site is of negligible ecological value and hence there are no concerns with regard to potential ecological impacts within the site boundary. However, Crabtree Fields, a locally valuable resource for birds and as a public amenity, is adjacent to the site and hence potential for affects to this site are considered.
- 6.2 Provided the mitigation and enhancement strategy, devised in accordance with local BAP objectives and best practice for biodiversity design in London, is implemented then possible impacts as a result of the slight increased shading during the day or light pollution at night, can be off-set. Indeed, with the proposed changes to the planting and management of Crabtree Fields, together with the incorporation of green roofs on the new building, it is considered likely that opportunities for local wildlife, including valued populations of house sparrow and starling, would be improved. As such, the amenity value of the park, in terms of its provision of an accessible area in which to enjoy wildlife, should be retained and possibly enhanced.
- 6.3 It is concluded that the proposed development would be in accordance with relevant planning policy with respect to nature conservation issues and would assist in delivering local BAP objectives.

**Appendix 1 Email comments on a previous Planning
Application (Ref: 2005/2739/P) from Moira
Cash, Principal Nature Conservation Officer
for the London Borough of Camden**

Comments on Planning Application July 2005

Ref: 2005/2739/P

7-15 Whitfield Gardens

Date of comments: August 4th 2005

Planning Officer: Alex Bushell

Having seen the revised application for this site today, as the Principal Nature Conservation Officer for the Borough I have severe concerns over the detrimental effects of the proposed development on the open space Crabtree Fields.

I have been monitoring this site for several years now as regards its bird populations as one of the only council owned parks to have a resident population of the House Sparrow *Passer domesticus* as well as a good population of starlings.

The House Sparrow *Passer domesticus* and Starling *Sturnus vulgaris* are now on the JNCC red list for bird species of conservation concern in this country. (1).

With this in mind the Camden Biodiversity Action Plan (as agreed and signed up to by the Executive in 2002, and referenced in the revised UDP) has an Action Plan to protect House Sparrows *Passer domesticus* within the Borough, thus I have been closely monitoring works within the park to these ends.

Implementing the Camden Biodiversity Action Plan is a target in the Community Strategy (Target 88):

By March 2002 the Council will have put together a local biodiversity action plan to protect and enhance wildlife and plants across the Borough. The Council will then work with residents, landowners, schools and others to put the plan into practice".

I would put forward the new Biodiversity policy in the UDP Revised Deposit Draft Section 4 to support this objection including Policy N6.

The proposed design put forward in the planning application would I feel have a detrimental effect upon the wildlife utilising the site. The increased height of the building would create shading of the site (as shown on the shade studies produced) with the related effects upon soil quality and fauna, the invertebrate populations using the site and the bird populations feeding on the above. The plans to remove the wall (on the southern boundary) and attached ivy and shrubbery would also impact on the invertebrate and bird populations of the site as this currently excellent nesting and feeding habitat.

I am also concerned about the effects of disturbance and light "trespass" pollution upon the wildlife of the site particularly roosting bird populations. Offices

species
conservation
with species
have declined
by 60%
in 25 yrs

bio.org
British Trust
for Ornithology

and residential units are likely to leave their lights on all night, plus associated increased noise, lighting up the site disrupting the natural cycle of the birds. This small site maintains an excellent bird population for the area, which enhances the amenity value of the site.

I do also have concerns regarding the walls of glass which will be overlooking the park at some height, which may be likely to cause a hazard to the bird populations (due to reflection and collision).

The proposed development is likely to create a boxed, darker site decreasing the amenity value of the site.

I would reference Policy N4 of the UDP Revised Deposit Draft Section 4 to support this objection. I would also note the proposed development is not making any contribution to the supply of open space as recommended by the policy, yet it is 14,500sq feet.

I would also comment that this site is within an area which is defined as a nature conservation deficiency area in the UDP Revised Deposit Draft 2004 Section 4, and that the development will be degrading a good wildlife site.

I would use the current UDP policies EN52 and EN59 plus the replacement UDP (Revised Deposit Draft May 2005) policy N2B Development bordering public and private open space to support the above comments.

I would also note that any future development might like to include features that can enhance local wildlife e.g. the incorporation of swift, house martin and bat bricks, installation of kestrel and peregrine nest features and the use of green/brown roofs to improve biodiversity within the area. These could be requested through planning conditions. Point 4.28A makes specific reference to the greening of the built environment. I see only a small element of this within the proposed development.

Please contact me should you require any further information and keep me posted on the decisions on this application.

Regards
Maira Cash
Principal Nature Conservation Officer
London Borough of Camden
020 7974 8816

(1) Notes

1. Red and Amber List of Birds of Conservation Concern 2002-07. Published by the Joint Nature Conservation Committee, with 7 quantitative criteria used to assess the population status of each species and place it on the red, amber or green list. Red list species are those that are Globally threatened according to International Union for Conservation of Nature (IUCN) criteria, and whose population or range has declined rapidly in

recent years; and those that have declined historically and not shown a substantial recent recovery

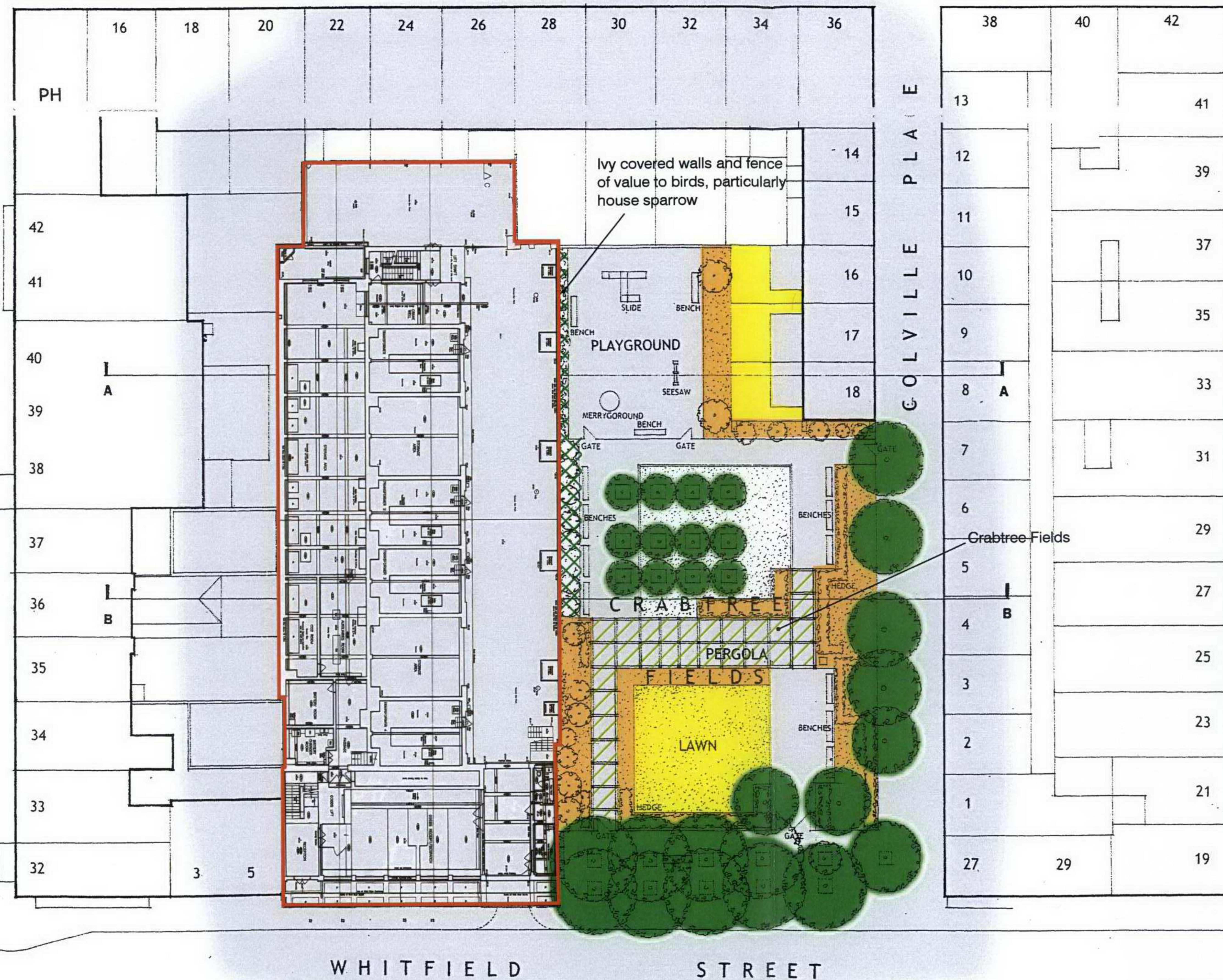
Amber list species are those with an unfavourable conservation status in Europe; those population or range has declined moderately in recent years; those whose population has declined historically but made a substantial recent recovery; rare breeders; and those with internationally important localised populations.

Plan

Habitat Features (including Crabtree Fields)
(2764_01b 02/06 JA/MP)

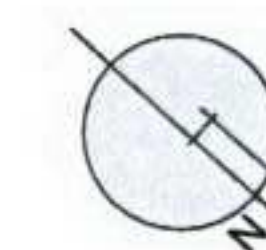
CHARLOTTE STREET

WINDMILL STREET



- Site Boundary
- Broadleaf tree
- Managed shrub beds (mainly ornamental species)
- Climbing vegetation (on pergola)
- Amenity grassland
- Shrubs and dense ivy
- Buildings & hardstanding
- Compacted hoggin

Note: Based on drg CR01 produced by ADZ Architects



Drawing Title

**Habitat Features
(including Crabtree Fields)**

Client

Artesian Property Partnership Ltd

Project

7 - 15 Whitfield Street, London, W1

Scale

Not to scale

Drawing No

2764/01b

Date

02/06 JA/MP

Checked

Waterman CPM
Environmental Planning & Design

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