

Proposals for Mixed Use Regeneration

140-146 CAMDEN STREET LONDON NW1 9PF



Planning Report

Biodiversity & Ecological Assessment

Prepared by:

The Ecology Consultancy



140-146 Camden Street,
London Borough of Camden
Biodiversity and Ecological Assessment
Report for Elebro Ltd.

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Executive Summary

A Phase 1 habitat survey incorporating a protected species assessment was carried out at 140-146 Camden Street, London Borough of Camden on the 23rd May 2013. This survey was undertaken in order to complete a Preliminary Ecological Appraisal of the site. It also includes an assessment of any ecological constraints applying to the development and recommendations for protecting, managing and enhancing the wildlife value of the site. The main findings of the survey are as follows:

- The site is not situated in or immediately adjacent to any statutory designated nature conservation sites. The nearest statutory designated site, Camley Street Nature Park Local Nature Reserve (LNR), is situated approximately 1.10km south east of the site. The closest non-statutory Site of Importance for Nature Conservation (SINC) is London's Canals SINC, which adjoins the south east site boundary.
- Based on the preliminary ecological appraisal, the nature conservation interest of the site has been evaluated as follows:
 - The site was dominated by a large building surrounded by small areas of introduced shrub, ruderal and ephemeral vegetation, all of which are considered to be of ecological value within the immediate vicinity of the site only.
 - Three semi-mature trees adjacent to the north-west site boundary on Bonny Street have the potential to support nesting birds. However, these trees are external to the site and are scheduled to be retained within the development proposals.
 - The building on site was of **negligible** potential to support roosting bats.
 - The introduced shrub was of **low** potential to support widespread bird species.
 - The site was of negligible potential to support any other protected species.

The following mitigation measures are recommended, further detail can be found in Section 5 of this report:

- **Birds:** Where the scope of works requires the removal of any vegetation, (cutting to 150mm above ground) clearance must be carried out outside of the main bird nesting season (March to August inclusive) to avoid any potential offences relating to nesting birds.
- Where this is not possible, a search for any nesting birds prior to vegetation clearance must be undertaken by an experienced ecologist and, if any are found, the nests are to be protected in accordance with recommendations provided until such time as the young have fledged.

- **Trees:** The three semi-mature trees external to the north-west site boundary along Bonny Street are to be retained and will be protected in accordance with BS 5837 2012 *Trees in relation to design, demolition and construction*.
- **London's Canals SINC:** To limit disturbance to the Regent's Canal watercourse beyond the site, adequate protection to prevent accidental damage or pollution should be implemented. No works or storage of materials should take place in the designated protected area. The Environment Agency's Pollution Prevention Guidance (PPG) 5: 'Works & Maintenance In or Near Water' should be followed to minimise any risk of pollution entering the watercourses.

A number of enhancement measures are recommended for the site, including:

- Biodiverse green roofs that are beneficial to the overall biodiversity of urban landscapes; and,
- Planting schemes using plants of known value to wildlife, including climbers along fences and walls in order to create living walls that enhance the biodiversity value of the adjoining SINC; and,
- Provision of bird nesting opportunities through the addition of artificial nest boxes fixed on suitable building facades.

1 Introduction

BACKGROUND

- 1.1 The Ecology Consultancy was commissioned by Elebro Limited on 15th May 2013, to carry out a Preliminary Ecological Appraisal (PEA) at 140-146 Camden Street, London Borough of Camden. The appraisal was undertaken in order to provide baseline ecological information and to assess the potential for the site to support protected species. The assessment highlights any potential ecological constraints associated with the proposed development and provides recommendations for further surveys, where appropriate.

SCOPE OF THE REPORT

- 1.2 This report is based on a desk top study, an extended field survey using standard Phase 1 habitat survey methodology (JNCC, 2010), and a protected species assessment. This approach is designed to identify broad habitat types at a site, to identify the potential of habitats to support protected species, and to assist in providing an overview of the ecological interest at a site. It is generally the most widely used and professionally recognised method for a preliminary ecological site appraisal.
- 1.3 A habitat plan of the site is included in Appendix 1, together with photographs in Appendix 2. A full list of plant species identified during the survey, along with an assessment of their abundance¹, is provided in Appendix 3. Scientific names are given after the first mention of a species, thereafter, common names only are used. Nomenclature follows Stace (2010) for vascular plant species. The relevant legislation and policies relating to protected species and habitats are set out in Appendix 4.

SITE CONTEXT AND STATUS

- 1.4 The site is located at the corner of Bonny Street and Camden Street (A400), London Borough of Camden. The immediate area surrounding the site consists of residential properties and commercial buildings. The site is isolated by a railway viaduct to the north and Regent's Canal immediately adjoining the south east boundary. Regent's Canal is part of the London's Canals network, which is designated as a non-statutory

¹ Plant species abundance was recorded using the DAFOR system (where D = dominant, A = abundant, F = frequent, O = occasional and R = rare).

Site of Metropolitan Importance for Nature Conservation (SMINC). The proposed development site is approximately 0.15 hectares (ha) in size. The National Grid Reference for the centre of the site is TQ 290 841.

DEVELOPMENT PROPOSAL

- 1.5 Proposals outline plans for the redevelopment of the current building to include the provision of flexible commercial space, mixed tenure residential apartments and associated amenity space.

2 Methodology

DESK TOP STUDY

- 2.1 Information regarding the present and historical ecological interest of the site and within a 1 kilometre (km) radius was commissioned from Greenspace Information for Greater London (GiGL, 2013). In addition, a search was made of the on-line mapping service (<http://magic.defra.gov.uk/>) to ascertain the presence of any statutory designated sites.
- 2.2 In addition, The UK (JNCC, 2010), London (London Biodiversity Partnership, 2010: <http://www.lbp.org.uk>) and London Borough of Camden Biodiversity Action Plans (BAPs) (<http://camden.gov.uk/ccm/content/leisure/outdoor-camden/nature-in-camden/wildlife/introduction-to-the-camden-biodiversity-action-plan.en>) were reviewed for those species and habitats that may be present, or potentially present at the site.
- 2.3 The following information was sourced from MAGIC and GiGL:
- Statutory sites of nature conservation importance;
 - Non-statutory sites designated as SINCs at county level as being of local conservation importance and often recognised in Local Authority development plans;
 - Protected, rare and other notable species and;
 - Priority species and habitats in the UK, London and the London Borough of Camden BAPs, which may be relevant to the site.

HABITAT SURVEY

- 2.4 A field survey of the site was carried out on the 23rd May 2013. Habitats were described and mapped following standard Phase 1 Habitat survey methodology. The site was also surveyed for the presence of invasive plant species as defined by Schedule 9 of the Wildlife and Countryside Act, 1981 (see Appendix 4).
- 2.5 A habitat plan of the site is included in Appendix 1; photographs are presented in Appendix 2.
- 2.6 The survey was conducted by Caroline Ford who is an experienced ecologist competent in carrying out botanical surveys and holds membership of the Chartered Institute of Ecology and Environmental Management (CIEEM).

PROTECTED SPECIES ASSESSMENT

- 2.7 The habitats at the site were evaluated as to their likelihood to provide sheltering, roosting, nesting and foraging habitat for protected and/or notable species. The evaluation is based on the results of the desk top survey, direct field observations made during the site survey, an assessment of the suitability of on-site and adjoining habitat for the species included, and information on the wider distribution of these species in the UK and locally.
- 2.8 The potential of the site to support protected and/or notable species was assessed using field observations, carried out at the same time as the habitat survey, and the results of the desk top study. Where the site was considered to have potential to support protected species, owing to the presence of suitable habitat, further investigations were carried out. These included inspecting the site for field signs as follows:
- Inspection for the presence of features on buildings and trees, indicating potential for roosting bats, such as gaps in brick work and weatherboards and crevices, fissures, holes, loose bark and dense ivy *Hedera helix*.
 - Assessment of the presence of nesting habitat for breeding birds, such as mature trees and introduced shrub and evidence of recent bird nesting, including territorial activity, old nests, faecal marks, etc.
- 2.9 The likelihood of occurrence is ranked as follows and relies on the findings of the current survey and an evaluation of existing data.
- Negligible – while presence cannot be absolutely discounted, the site includes very limited or poor quality habitat for a particular species or species group. No local returns from a data search, surrounding habitat considered unlikely to support wider populations of a species/species group. The site may also be outside or peripheral to known national range for a species,
 - Low – on-site habitat of poor to moderate quality for a given species/species group. Few or no returns from data search, but presence cannot be discounted on the basis of national distribution, nature of surrounding habitats, habitat fragmentation, recent on-site disturbance etc.
 - Medium – on-site habitat of moderate quality, providing all of the known key requirements of a given species/species group. Local returns from the data search, within national distribution, suitable surrounding habitat. Factors limiting the likelihood of occurrence may include small habitat area, habitat severance, and disturbance.

- High – on-site habitat of high quality for a given species/species group. Local records provided by desk top study. The site is within/peripheral to a national or regional stronghold. Good quality surrounding habitat and good connectivity.
- Present – presence confirmed from the current survey or by recent, confirmed records.

2.10 The purpose of this assessment is to identify whether more comprehensive Phase 2 surveys for protected species should be recommended.

SITE EVALUATION

2.11 The site has been evaluated broadly following guidance issued by the Chartered Institute of Ecology and Environmental Management (CIEEM 2006), according to a geographic scale (significance at the international level down to the site level) and using a range of criteria for assigning ecological value, as follows:

- Presence of sites or features designated for their nature conservation interest. Examples include internationally or nationally designated sites such as Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs), locally designated sites such as Local Nature Reserves (LNRs) and non statutory sites such as Sites of Importance for Nature Conservation (SINCs);
- Biodiversity value, for example, habitats or species which are rare or uncommon, species-rich assemblages, species which are endemic or on the edge of their range, large populations or concentrations of uncommon or threatened species, and/or plant communities that are typical of valued natural/semi-natural vegetation types;
- Potential value, as addressed by targets to increase the biodiversity value for example of SSSIs, international sites and some BAP species and habitats. If detailed plans exist to enhance the value of such areas, then it may be appropriate to value them as if the intended resource already existed;
- Secondary and supporting value, for example, habitats or features which provide a buffer to valued features or which serve to link otherwise isolated features; and
- Presence of UK and/or London and/or London Borough of Camden BAP habitats and species.

2.12 The ecological interest of the site and the proposed development has also been evaluated in terms of the Camden Local Development Framework (LDF) containing policies relating to nature conservation.

LIMITATIONS

- 2.13 It should be noted that, whilst every effort has been made to provide a comprehensive description of the site, no investigation can ensure the complete characterisation and prediction of the natural environment.
- 2.14 This PEA and protected species assessment does not constitute a full botanical survey, or a Phase 2 pre-construction survey that would include accurate GIS mapping for invasive or protected plant species.
- 2.15 When interpreting desk study records, it is important to note that, even where data are held, a lack of records for a defined geographical area does not necessarily determine a lack of ecological interest; the area may simply be under-recorded. Records are summarised below.
- 2.16 The protected species assessment provides a preliminary view of the likelihood of protected species occurring on the site, based on the suitability of the habitat, known distribution of the species in the local area provided in response to our enquiries, and any direct evidence on the site. It should not be taken as providing a full and definitive survey of any protected species group. It is only valid at the time the survey was carried out. Additional surveys may be recommended if, on the basis of the preliminary assessment or during subsequent surveys, it is considered reasonably likely that other protected species may be present.
- 2.17 Despite these limitations, it is considered that this report reflects accurately the habitats present, their biodiversity values and the potential of the site to support protected and notable species.

3 Results

DESK STUDY

- 3.1 The following records regarding present and historical ecological interest at the site and within a 1km radius were supplied by GiGL and MAGIC. Records are summarised in paragraphs 3.2- 3.10 below.

Statutory Sites of Importance for Nature Conservation

- 3.2 The proposed development site is not subject to statutory nature conservation designations, and there are no European or National statutory designations within a 1km radius of the site. The nearest statutory designated site is Camley Street Nature Park LNR, an area of 0.84 hectares (ha), approximately 1.10km south east of the site. The site holds a small area of woodland, a species-rich wildflower meadow and a pond.

Non-Statutory Sites of Importance for Nature Conservation

- 3.3 The site does not form part of a non-statutory SINC. There are six non-statutory sites designated as SINC located within the 1km data search area. The nearest designated site is London's Canals SINC, where Regent's Canal adjoins the southern site boundary. Details of all six SINC within the study area are provided in Table 1, below:

Table 1: Non-statutory sites within 1km of the site

Site Name	Site Description	Area (ha)	Approximate Distance (m) and direction from site
Site of Metropolitan Importance for Nature Conservation			
London's Canals	London's canals support a wide range of aquatic flora with a number of locally uncommon species. The canals also support important invertebrate fauna (including several species of dragon/damselflies, a diverse fish community, and breeding waterfowl.	177.92	Adjoining boundary S
Regent's Park	This Royal Park is important for its wide variety of breeding and migrant birds, including a large heronry. An informally-managed wildlife area has been established in the north west of the park, supporting various common butterflies and other invertebrates.	131.64	920m SW
Site of Borough Grade I Importance for Nature Conservation			

Table 1: Non-statutory sites within 1km of the site

Site Name	Site Description	Area (ha)	Approximate Distance (m) and direction from site
Kentish Town City Farm, Gospel Oak Railsides and Mortimer Terrace Nature Reserve	Kentish Town City Farm contains a wildlife garden with a pond planted with native marginal plants. The railsides support a mosaic of habitat including secondary woodland, scrub and grassland. Mortimer Terrace Nature Reserve is mostly sycamore woodland with a wide range of planted native trees, shrubs and woodland flowers.	6.72	1km N
London Zoo	London Zoo is of national importance for environmental education and of international conservation importance for some of its captive-breeding programmes. The zoo plays a significant role in the ecology of Regent's Park, providing an important refuge for many of the capital's native species. Its habitats support a variety of birds, invertebrates, bats and other mammals.	15.31	1km SW
Site of Borough Grade II Importance for Nature Conservation			
North London Line	An area of wasteland habitat with scrub and scattered trees. The site is important for butterflies and other invertebrates.	0.88	820m E
Sites of Local Importance for Nature Conservation			
Rochester Terrace Gardens	A small public garden containing amenity grassland with wildflower seeding, mature native and non-native trees and shrubs. Areas will develop into scrub and hedges.	0.45	360m N

Protected and Notable Species

- 3.5 Protected and BAP species have been recorded within a 1km radius of the site. Species that may potentially use or be found at the site include:
- 3.6 **Bats:** The data search returned records for at least five species of bats within a 1km radius of the site. These comprised noctule *Nyctalus noctula*, common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, pipistrelle species *Pipistrellus* sp., Daubenton's bat *Myotis daubentonii*, Myotis species *Myotis* sp. and *Vespertilionidae*. One record exists for bats recorded within the last 5 years; Daubenton's bat (980m SE, 2010). All bat species are protected under the Conservation of Habitats and Species Regulations 2010 (as amended), the Wildlife and Countryside Act 1981 (as amended) and classified as London BAP priority species.
- 3.7 **Birds:** The data search returned records for eight bird species. Of the UK and London BAP species recorded that could potentially utilise the site for nesting and/or foraging are starling *Sturnus vulgaris* and house sparrow *Passer domesticus*, both of which are UK Red List species. Species recorded include a number of birds that are listed on the Birds Directive (Annex 1) and Schedule 1 of the Wildlife and Countryside Act 1981 (as amended).
- 3.8 **Reptiles:** The data search returned no records for reptiles within 1km of the site.
- 3.9 **Amphibians:** The data search provided records for common frog *Rana temporaria* recorded most recently 659m south west of the site in 2009, and multiple records for common toad *Bufo bufo* recorded in 1999 with the nearest recorded 189m north east of the site. Both species are protected under the Wildlife and Countryside Act 1981 (Schedule 5). Common toad is also a UK BAP priority species.
- 3.10 **Mammals (other than bats):** The data search provided records for hedgehog *Erinaceus europaeus*, with the nearest recorded 180m south of the site in 2002. Hedgehogs are protected under the Wildlife and Countryside Act 1981 (Schedule 6) and are a UK and London BAP priority species.

EXTENDED PHASE 1 HABITAT SURVEY

Overview

- 3.11 The site comprised an existing building, separated into two parts, which is currently used as commercial office and warehouse space. The south east boundary of the site fronts the Regent's Canal. A large concrete platform spans over the canal alongside Camden Bridge; almost touching the existing building. A public towpath separates the site from the canal edge passing under Camden Street and Camden Road.

Building

- 3.12 The existing building consists of two parts constructed from brick with flat roofs. The northern part is a 1950s single storey warehouse building on the corner of Camden Street and Bonny Street with entrances on both streets (refer to Appendix 2, Photograph 1). The southern part is a three storey office building with frontages to Camden Street and the Regent's Canal (refer to Appendix 2, Photograph 2). The flat roofs over the entire building were in relatively good condition.

Scattered trees

- 3.13 Three semi-mature Norway maple *Acer platanoides* trees and one young cherry tree *Prunus* sp. were located external to the north west site boundary on the south side of Bonny Street (refer to Appendix 2, Photograph 1).

Introduced shrub

- 3.14 A dense hedge consisting of barberry *Berberis* sp. and *Photinia* sp. bordered the front of the building on Camden Street. Other species present included wood avens *Geum urbanum* and elder *Sambucus nigra*. A small area of introduced shrub was present alongside the south east elevation of the building next to the canal towpath (refer to Appendix 2, Photograph 2). Dominant species included whitebeam *Sorbus* sp., *Cotoneaster* sp. and honeysuckle *Caprifoliaceae* sp. Virginia creeper *Parthenocissus vitacea* had overgrown on the south eastern elevation of the building fronting the canal towpath.

Tall ruderal/ Ephemeral

- 3.15 Ruderal species were located at the edge of the canal towpath alongside a small area of introduced shrub. Dominant species included hemlock *Conium maculatum*, broad-leaved dock *Rumex obtusifolius*, cleavers *Galium aparine* and nettle *Urtica dioica* and were interspersed with ephemeral species including greater plantain *Plantago major*,

white clover *Trifolium repens*, common chickweed *Stellaria media*, and herb robert *Geranium robertianum*.

Target notes

3.16 Please refer to Figure 1 in Appendix 1 for the locations of the features of ecological interest labelled as target notes and described below:

- Target Note 1 (TN1): The three storey office building had a flat roof which was well-sealed and in relatively good condition. No features of potential use by bats were noted.
- Target Note 2 (TN2): A large concrete platform spans over the canal alongside Camden Bridge, almost touching the existing building. A large number of cracks have formed within the concrete slabs, creating visible crevices suitable to support roosting bats. This area is external to the site boundary and will be protected from the construction works.

PROTECTED SPECIES ASSESSMENT

3.17 The potential for the habitats recorded to support protected species was evaluated. The following protected species are considered likely to be supported in habitats within the site:

- Bats, and;
- Breeding birds.

3.18 The likelihood of these species being present is further evaluated (see Table 2), based on the results of the desk top study, observations made during the site survey, and an assessment of the suitability of on-site and adjoining habitat. The presence of invasive plant species, for which national legislation exists, is also considered. The relevant legislation and policies relating to protected species and habitats are set out in Appendix 4.

Table 2: Protected, Notable and Invasive Species Assessment.

Habitat/species	Main legislation and policy (see Appendix 4)	Reason for consideration	Likelihood of occurrence
Bats	<p>Schedule 2 of the Conservation of Habitats and Species Regulations 2010 (as amended).</p> <p>Wildlife and Countryside Act 1981 (as amended) Schedule 5.</p>	<p>The site contains potential roosting habitat i.e. buildings and semi-mature trees.</p> <p>The data search provided several records for bats.</p>	<p>Building NEGLIGIBLE: The flat roofs of building are well-sealed with no roof voids and no obvious cracks or crevices suitable for roosting bats. The site is located within an urban built-up area with limited open space. The adjoining Regent's Canal offers potential foraging and commuting habitat for bats. However vegetation beside the towpath and along the canal is sparse and limited in extent, which reduces the suitability of this stretch of canal for foraging bats.</p> <p>Trees Negligible: Three semi-mature trees (Appendix 2, Photograph 4) situated on the pavement external to the north west site boundary had no obvious features, such as cracks and fissures that would support roosting bats.</p> <p>If foraging bats are present on site they are not expected to be present in high numbers due to the limited extent of foraging resource in the immediate locality.</p>
Breeding birds	Wildlife and Countryside Act 1981 (as amended).	<p>The site contains suitable breeding and foraging habitat i.e., trees, shrub for a variety of common bird species.</p> <p>Records were provided from the data search.</p>	<p>LOW: Small areas of introduced shrub provide limited nesting and foraging opportunities for a small number of common bird species.</p> <p>The semi-mature Norway maple trees external to the site boundary on Bonny Street have the potential to support birds that nest in the high canopy, e.g. crows. These trees are scheduled to be retained within the development plans.</p>
Invasive species			
Invasive species	Section 14 and Part II of Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).	Invasive species are widespread in many habitats, commonly found on disturbed sites and along water courses.	NEGLIGIBLE: No invasive species were recorded during the site survey. However, their absence cannot be guaranteed due to the timing of the survey and their ability to colonise rapidly.

4 Evaluation

- 4.1 Habitats and species on the site were evaluated following standard guidance on ecological impact assessment published by the Institute of Ecology and Environmental Management (IEEM 2006) using the recommended geographic frame of reference.

Features of International Value

- 4.2 Features of international value are principally sites covered by international legislation or conventions, such as those sites designated under the Habitats Regulations which implements the Natural Habitats and Wild Fauna and Flora (92/43/EC) (Habitats Directive). Sites designated at this level include SACs and SPAs as well as Ramsar sites which are designated for habitats and / or important populations of certain species.
- 4.3 There are no sites of international importance for nature conservation within 1km of the site and it does not meet any of the criteria for designation at this scale.

Features of National Value

- 4.4 Features of National value include statutory sites such as Sites of Special Scientific Interest (SSSIs) which are designated under the Wildlife and Countryside Act 1981 (as amended) as well as species such as common reptile species which are subject to national legislation rather than international legislation.
- 4.5 The site does not form part of a site of national importance for nature conservation. None of the habitats or populations or assemblages of species present, or likely to be present, would warrant designation at the national level using appropriate criteria (Guidelines for selection of biological SSSIs <http://jncc.defra.gov.uk/page-2303>).
- 4.6 National legislation also provides protection to certain species in addition to those covered by international legislation, including bats and birds. While such species may be present, the population of any one species may not be of national importance in terms of diversity, size or rarity.
- 4.7 The UK BAP promotes specific targets for species and habitats of conservation concern. While some common but declining BAP species may be present, it is not considered that they would occur in nationally important numbers.

Features of County (i.e. Greater London) Value

- 4.8 The site is not designated as a Site of Metropolitan Importance and it does not support habitats of value at this level.
- 4.9 The site does not contain suitable habitat or offer roosting features that would be of potential value to bats. Regent's Canal, which lies adjacent to the south east site boundary offers potential foraging and commuting habitat for bats. Any bat species potentially using the site are unlikely to occur in nationally important numbers.

Features of District (i.e. Camden) Value

- 4.10 The site is not designated as a Site of Borough Importance and does not support habitats of value at this level, nor is the site likely to support protected or notable species of value at this level.

Features of Local (i.e. 1-5km radius) Value

- 4.11 The site is not designated as a SINC, however the south east site boundary adjoins Regent's Canal, part of London's Canals network, which is a site of Metropolitan Importance for Nature Conservation. Development works will have no impact on this site as all works will be contained within the boundary of the proposed development site and will be screened by protective sheeting. To further ensure the canal is protected from construction works, a 2.4m high hoarding will be installed alongside the canal path.
- 4.12 While some common bird species may forage within the limited introduced shrub at the south east and south west site boundaries, it is unlikely that they will occur in nationally important numbers and any populations present on site are likely to be of biodiversity value up to a local scale only.
- 4.13 The three semi-mature Norway maple trees adjacent to the north-west site boundary have the potential to support nesting birds, however these trees are external to the site and are scheduled to be retained within the development proposals.

Features of value within the immediate vicinity of the site

- 4.14 The site provides habitat of limited extent and is of local significance due to its location in a densely built urban environment. The small areas of introduced shrub on site are considered likely to provide habitats of low biodiversity value for small

numbers of foraging and nesting birds within the immediate vicinity of the site only, due to their limited extent and structure.

LOCAL PLANNING POLICY

- 4.15 On the basis of the survey undertaken, it is considered that a number of policies contained in Camden's Local Development Framework (LDF) adopted in November 2010 are relevant to the site, as listed in Table 3 below. The full text of the relevant policies from this document and those of the Mayor of London's Plan are contained in Appendix 4.

Table 3 : Camden Local Development Framework policies relevant to the site

Policy	Relevance to the site
Development Policy DP22 – Promoting sustainable design and construction:	
<p><i>Measures to tackle climate change are integral in the development process and are a priority of the Council.</i></p> <p><i>The Council will require development to incorporate sustainable design and construction measures. Schemes must:</i></p> <p><i>b) incorporate green or brown roofs and green walls wherever suitable.</i></p> <p><i>The Council will require development to be resilient to climate change by ensuring schemes include appropriate climate change adaptation measures, such as:</i></p> <p><i>f) summer shading and planting.</i></p>	<p>Recommendations have been given in relation to installing biodiverse roofs on the new building.</p>

5 Conclusions and Recommendations

CONCLUSIONS

- 5.1 The site does not form part of any statutory or non-statutory designated nature conservation sites. The nearest statutory designated site, Camley Street Nature Park LNR, is situated approximately 1.10km south east of the site. The closest non-statutory nature conservation designation is London's Canals SINCR, which adjoins the south east site boundary.
- 5.2 On the basis of the PEA and protected species assessment, introduced shrub and ruderal/ephemeral vegetation on site is considered to be of low biodiversity value within the immediate vicinity of the site only.
- 5.3 Introduced shrub on site is considered to have low potential to support widespread bird species. The building is considered to have negligible potential to support roosting bats. The site is considered to have negligible potential to support any other protected species.
- 5.4 Three semi-mature Norway maple trees (Appendix 2, Photograph 1) are external to the north-west site boundary and have potential to be of local value to widespread common bird species. These trees are scheduled to be retained throughout the development works.
- 5.5 The potential presence of nesting bird species will require mitigation measures to be undertaken at the site. Advice regarding this is summarised below.

RECOMMENDATIONS

- 5.6 The following mitigation measures are recommended to avoid a legal offence and ensure compliance under The Mayor's Biodiversity Strategy Proposal 3 (See Appendix 4). Recommendations in order to enhance site ecology are also provided.

Protected Species Mitigation

- 5.7 *Breeding birds:* All nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended). The site contains introduced shrub which has the potential to support breeding birds. Where the proposed works require the removal of this habitat, any vegetation clearance (cutting to 150 mm above ground) should be carried out

outside of the main bird nesting season (March to August inclusive) to avoid any potential offences relating to nesting birds (Newton *et al.*, 2004).

- 5.8 Where this is not possible, a search for nesting birds up to 48 hours prior to vegetation clearance taking place must be undertaken by an experienced ecologist. If any nests are found, the nests are to be protected by an exclusion zone around the nest. Works may then proceed up to, but not within, this exclusion zone until such time as an ecologist confirms the young have fledged the nest. If nesting birds are found at any time during clearance works, work must stop immediately and an ecologist must be consulted.

Habitat Retention and Protection

- 5.9 *Protection of the Regent's Canal arm of London's Canals SINC:* To limit disturbance to the Regent's Canal watercourse beyond the site, adequate protection to prevent accidental damage or pollution should be implemented. No works or storage of materials should take place in the designated protected area. The Environment Agency's Pollution Prevention Guidance (PPG) 5: 'Works & Maintenance In or Near Water' should be followed to minimise any risk of pollution entering the watercourses. This is available online and free of charge at www.netregs.gov.uk.
- 5.10 *Mature trees:* It is recommended that the three semi-mature Norway maple trees external to the north-west site border on Bonny Street are protected in accordance with BS 5837 2012 *Trees in relation to design, demolition and construction* (BSI, 2012).

Habitat Enhancements and Recommendations

- 5.11 The following recommendations have been prepared as a guide to protect and enhance the biodiversity value of the site.
- 5.12 *Biodiverse green roofs:* Biodiverse green roofs are created by establishing an appropriate depth of substrate (minimum 150mm) and then introducing a wildflower mix with additional plug planting. To ensure maximum benefits and to install a productive green roof in-line with Camden's Development Policy DP22, it is recommended that a low-nutrient bio-diverse roof is incorporated into the building design with additional habitat features such as temporary pools and rotting wood which will enhance the wildlife value of the site.

- 5.13 *Vegetation planting schemes of value to wildlife:* It is acknowledged that using native species in planting schemes attract insects and provides a potential food source for bats (Hundt, 2012). Climbers are recommended along the edges of fences and/or walls where they will provide a green façade of potential value to foraging birds and insects. Landscaping proposals incorporating these recommendations would enhance the value of the site and the adjoining SINC for biodiversity by including native species where possible.
- 5.14 *Provision of bird nesting and opportunities:* Bird nesting boxes are recommended to be erected on the new building fascia. Woodcrete bird boxes (Schwegler, 2011) are appropriate as they include a broad range of designs, are long lasting compared to wooden boxes and insulate occupants from extremes of temperature and condensation. Nesting boxes would require simple maintenance over the winter months.
- 5.15 These measures will provide an enhancement of the site for wildlife and contribute to Camden, London and UK BAP objectives.

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Appendix 1: Habitat Map

Figure 1: Habitat Survey Map



Appendix 2: Photographs

Photograph 1
1950s single storey
warehouse building. North
west elevation.



Photograph 2
Three storey office building.
South-east elevation.



Appendix 3: Plant Species List

Plant Species List for 140-146 Camden Street, London Borough of Camden compiled from the Preliminary Ecological Assessment habitat survey carried out on the 23rd May 2013.

Scientific nomenclature follows Stace (2010) for vascular plant species. Vascular plant common names follow the Botanical Society of the British Isles 2003 list, published on its web site, www.bsbi.org.uk. Please note that this plant species list was generated as part of a Phase 1 habitat survey, does not constitute a full botanical survey and should be read in conjunction with the associated Phase 1 Report.

Abundance was estimated using the DAFOR scale as follows:

D = dominant, A = abundant, F = frequent, O = occasional, R = rare, LD =locally dominant
e=edge only, p=planted, s=seedling or sucker, t=tree, y = young tree, s = shrub.

Latin Name	Common name	Abundance	Qualifiers
<i>Acer platanoides</i>	Norway maple	O	t
<i>Berberis sp.</i>	Barberry	F	s
<i>Caprifoliaceae sp.</i>	Honeysuckle	O	
<i>Conium maculatum</i>	Hemlock	O	
<i>Cotoneaster sp.</i>	Cotoneaster	O	s
<i>Galium aparine</i>	Cleavers	O	
<i>Geranium robertianum</i>	Herb robert	F	
<i>Geum urbanum</i>	Wood avens	O	
<i>Holcus lanatus</i>	Yorkshire fog	O	
<i>Parthenocissus vitacea</i>	Virginia creeper	F	
<i>Plantago major</i>	Greater plantain	O	
<i>Prunus sp.</i>	Cherry	R	y
<i>Photinia sp.</i>	Photinia	O	s
<i>Ranunculus repens</i>	Creeping buttercup	O	
<i>Rubus fruticosus agg.</i>	Bramble	O	
<i>Rumex obtusifolius</i>	Broad-leaved dock	O	
<i>Sambucus nigra</i>	Elder	R	t
<i>Sorbus sp.</i>	Whitebeam	R	t
<i>Stellaria media</i>	Common chickweed	F	
<i>Taraxacum officinale agg.</i>	Dandelion	F	
<i>Trifolium repens</i>	White clover	F	
<i>Urtica dioica</i>	Nettles	LD	

Appendix 4: Legislation and Planning Policy

Important notice: This section contains details of legislation and planning policy applicable in Britain only (i.e. not including the Isle of Man, Northern Ireland, the Republic of Ireland or the Channel Islands) and is provided for general guidance only. While every effort has been made to ensure accuracy, this section should not be relied upon as a definitive statement of the law.

A NATIONAL LEGISLATION AFFORDED TO SPECIES

The objective of the EC Habitats Directive² is to conserve the various species of plant and animal which are considered rare across Europe. The Directive is transposed into UK law by The Conservation of Habitats and Species Regulations 2010 (as amended) (formerly The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended)) and The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended).

The Wildlife and Countryside Act 1981 (as amended) is a key piece of national legislation which implements the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and implements the species protection obligations of Council Directive 2009/147/EC (formerly 79/409/EEC) on the Conservation of Wild Birds (EC Birds Directive) in Great Britain.

Since the passing of the Wildlife & Countryside Act 1981, various amendments have been made, details of which can be found on www.opsi.gov.uk. Key amendments have been made through the Countryside and Rights of Way (CROW) Act (2000).

Other legislative Acts affording protection to wildlife and their habitats include:

- Deer Act 1991;
- Countryside and Rights of Way (CROW) Act 2000;
- Natural Environment & Rural Communities (NERC) Act 2006;
- Protection of Badgers Act 1992;
- Wild Mammals (Protection) Act 1996.

Species and species groups that are protected or otherwise regulated under the aforementioned domestic and European legislation, and that are most likely to be affected

² Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora

by development activities, include herpetofauna (amphibians and reptiles), badger, bats, birds, dormouse, invasive plant species, otter, plants, red squirrel, water vole and white clawed crayfish.

Explanatory notes relating to species protected under The Conservation of Habitats and Species Regulations 2010 (as amended) (which includes smooth snake, sand lizard, great crested newt and natterjack toad), all bat species, otter, dormouse and some plant species) are given below. **These should be read in conjunction with the relevant species sections that follow.**

- In the Directive, the term ‘deliberate’ is interpreted as being somewhat wider than intentional and may be thought of as including an element of recklessness.
- The Conservation of Habitats and Species Regulations 2010 does not define the act of ‘migration’ and therefore, as a precaution, it is recommended that short distance movement of animals for e.g. foraging, breeding or dispersal purposes are also considered.
- In order to obtain a European Protected Species Mitigation (EPSM) licence, the application must demonstrate that it meets all of the following three ‘tests’: i) the action(s) are necessary for the purpose of preserving public health or safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequence of primary importance for the environment; ii) that there is no satisfactory alternative and iii) that the action authorised will not be detrimental to the maintenance of the species concerned at a favourable conservation status in their natural range.

Bats

All species of bat are fully protected under The Conservation of Habitats and Species Regulations 2010 (as amended) through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or taking (capture) of Schedule 2 species (e.g. bats);
- Deliberate disturbance of bat species as:
 - a) to impair their ability:
 - (i) to survive, breed, or reproduce, or to rear or nurture young;
 - (ii) to hibernate or migrate;
 - b) to affect significantly the local distribution or abundance of the species;
 - Damage or destruction of a breeding site or resting place.

Bats are also protected under the Wildlife and Countryside Act (WCA) 1981 (as amended) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance whilst occupying a place of shelter or protection; and
- Intentional or reckless obstruction of access to any place of shelter or protection.

A European Protected Species Mitigation (EPSM) licence issued by Natural England will be required for any works liable to affect a bat roost or for operations likely to result in a level of disturbance that might impair the bats ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The awarding of such a licence enables derogation (under condition) from the relevant legislation and also ensures appropriate mitigation measures are put in place and their efficacy is monitored.

The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded de facto protection, for example, where it can be proven that the continued usage of such area is crucial to maintaining the integrity and long-term viability of a bat roost.

The species protection provision of the Habitats Directive, as implemented by The Conservation of Habitats and Species Regulations 2010 (as amended), contains three “derogation tests” which must be applied by the Local Planning Authority when deciding whether to grant planning permission for a development that could harm a European Protective Species. The three tests are:

- The activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety
- There must be no satisfactory alternative; and
- Favourable conservation status of the species must be maintained.

It is the responsibility of the applicant to submit sufficient information to address these tests when applying for planning permission.

NB: For development activities, a Natural England EPSM Licence application can only be obtained after planning permission has been granted. However, the granting of planning permission does not guarantee that a licence will be issued by Natural England.

The NERC Act 2006 states that ‘every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of

conserving biodiversity', otherwise known as the Biodiversity Duty. Under Section 41 of the Act, the Secretary of State must publish a list of the living organisms and types of habitat which in the Secretary of State's opinion are 'Species of Principal Importance for the purpose of conserving Biodiversity' (SPIB's). This list is based on priority species recognised by the UK Biodiversity Action Plan (BAP, see below), and in addition to Annex II species listed under The Conservation of Habitats and Species Regulations 2010 (as amended). The S41 SPIB's list replaces the list published under Section 74 of the Countryside and Rights of Way (CROW) Act 2000 as those species of material consideration to the planning process. With regard to bats, these are barbastelle bat *Barbastella barbastellus*, Bechstein's bat *Myotis bechsteinii*, noctule bat *Nyctalus noctula*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared bat *Plecotus auritus* and greater and lesser horseshoe bats *Rhinolophus ferrumequinum* and *R. hipposideros*.

Birds

With certain exceptions, all birds, their nests and eggs are protected under Sections 1-8 of the Wildlife and Countryside Act 1981 (as amended). Among other things, this makes it an offence to:

- Intentionally kill, injure or take any wild bird;
- Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built;
- Intentionally take or destroy an egg of any wild bird;
- Sell, offer or expose for sale, have in his possession or transport for the purpose of sale any wild bird (dead or alive) or bird egg or part thereof.

Certain species of bird, for example the barn owl, black redstart, hobby, bittern and kingfisher receive additional special protection under Schedule 1 of the Act and Annex 1 of the European Community Directive on the Conservation of Wild Birds (2009/147/EC). This affords them protection against:

- Intentional or reckless disturbance while it is building a nest or is in, on or near a nest containing eggs or young;
- Intentional or reckless disturbance of dependent young of such a bird.

How is the legislation pertaining to birds liable to affect development works?

To avoid contravention of the Wildlife and Countryside Act 1981 (as amended), works should be planned to avoid the possibility of killing or injuring any wild bird, or damaging or destroying their nests. The most effective way to reduce the likelihood of nest destruction in particular is to undertake work outside the main bird nesting season which typically runs

from March to August³. Where this is not feasible, it will be necessary to have any areas of suitable habitat thoroughly checked for nests prior to vegetation clearance.

Those species of bird listed on Schedule 1 are additionally protected against disturbance during the nesting season. Thus, it will be necessary to ensure that no potentially disturbing works are undertaken in the vicinity of the nest. The most effective way to avoid disturbance is to postpone works until the young have fledged. If this is not feasible, it may be possible to maintain an appropriate buffer zone or standoff around the nest.

B NATIONAL AND EUROPEAN LEGISLATION AFFORDED TO HABITATS

Statutory Designations: National

Nationally important areas of special scientific interest, by reason of their flora, fauna, or geological or physiographical features, are notified by the countryside agencies as statutory **Sites of Special Scientific Interest** (SSSIs) under the National Sites and Access to the Countryside Act 1949 and latterly the Wildlife & Countryside Act 1981 (as amended). As well as underpinning other national designations (such as **National Nature Reserves** which are declared by the countryside agencies under the same legislation), the system also provides statutory protection for terrestrial and coastal sites which are important within a European context (Natura 2000 network) and globally (such as Wetlands of International Importance). See subsequent sections for details of these designations. Improved provisions for the protection and management of SSSIs have been introduced by the Countryside and Rights of Way Act 2000 (in England and Wales).

The Wildlife & Countryside Act 1981 (as amended) also provides for the making of **Limestone Pavement Orders**, which prohibit the disturbance and removal of limestone from such designated areas, and the designation of **Marine Nature Reserves**, for which byelaws must be made to protect them.

³ It should be noted that this is the main breeding period. Breeding activity may occur outwith this period (depending on the particular species and geographical location of the site) and thus due care and attention should be given when undertaking potentially disturbing works at any time of year.

Statutory Designations: International

Special Protection Areas (SPAs), together with **Special Areas of Conservation** (SACs) form the **Natura 2000** network. The Government is obliged to identify and classify SPAs under the EC Birds Directive (Council Directive 2009/147/EC (formerly 79/409/EEC)) on the Conservation of Wild Birds). SPAs are areas of the most important habitat for rare (listed on Annex I of the Directive) and migratory birds within the European Union. Protection afforded SPAs in terrestrial areas and territorial marine waters out to 12 nautical miles (nm) is given by The Conservation of Habitats & Species Regulations 2010 (as amended). The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended) provide a mechanism for the designation and protection of SPAs in UK offshore waters (from 12-200 nm).

The Government is obliged to identify and designate SACs under the EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora). These are areas which have been identified as best representing the range and variety of habitats and (non-bird) species listed on Annexes I and II to the Directive within the European Union. SACs in terrestrial areas and territorial marine waters out to 12 nautical miles are protected under The Conservation of Habitats & Species Regulations 2010 (as amended). The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended) provide a mechanism for the designation and protection of SACs in UK offshore waters (from 12-200 nm).

Ramsar sites are designated under the Convention on Wetlands of International Importance, agreed in Ramsar, Iran, in 1971. The Convention covers all aspects of wetland conservation and wise use, in particular recognizing wetlands as ecosystems that are globally important for biodiversity conservation. Wetlands can include areas of marsh, fen, peatland or water and may be natural or artificial, permanent or temporary. Wetlands may also incorporate riparian and coastal zones adjacent to the wetlands. Ramsar sites are underpinned through prior notification as Sites of Special Scientific Interest (SSSIs) and as such receive statutory protection under the Wildlife & Countryside Act 1981 (as amended) with further protection provided by the Countryside and Rights of Way (CROW) Act 2000. Policy statements have been issued by the Government in England and Wales highlighting the special status of Ramsar sites. This effectively extends the level of protection to that afforded to sites which have been designated under the EC Birds and Habitats Directives as part of the Natura 2000 network (e.g. SACs & SPAs).

Statutory Designations: Local

Under the National Sites and Access to the Countryside Act 1949 **Local Nature Reserves** (LNRs) may be declared by local authorities after consultation with the relevant countryside agency. LNRs are declared for sites holding special wildlife or geological interest at a local level and are managed for nature conservation, and provide opportunities for research and education and enjoyment of nature.

Non-Statutory Designations

Areas considered to be of local conservation interest may be designated by local authorities as a **Wildlife Site**, under a variety of names such as **County Wildlife Sites** (CWS), **Listed Wildlife Sites** (LWS), **Local Nature Conservation Sites** (LNCS), **Sites of Biological Importance** (SBIs), **Sites of Importance for Nature Conservation** (SINCs), or **Sites of Nature Conservation Importance** (SNCIs). The criteria for designation may vary between counties.

Together with the statutory designations, these are defined in local and structure plans under the Town and Country Planning system and are a material consideration when planning applications are being determined. The level of protection afforded to these sites through local planning policies and development frameworks may vary between counties.

Regionally Important Geological and Geomorphological Sites (RIGS) are the most important places for geology and geomorphology outside land holding statutory designations such as SSSIs. Locally-developed criteria are used to select these sites, according to their value for education, scientific study, historical significance or aesthetic qualities. As with local Wildlife Sites, RIGS are a material consideration when planning applications are being determined.

C NATIONAL PLANNING POLICY

The National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) replaced Planning Policy Statement (PPS9) in April 2012 as the key national planning policy concerning nature conservation. The NPPF emphasises the need for suitable development. The Framework specifies the need for protection of designated sites and priority habitats and priority species. An emphasis is also made for the need for ecological networks via preservation, restoration and re-creation. The protection and recovery of priority species – that is those listed as UK Biodiversity Action Plan priority species – is also listed as a requirement of planning policy. In

determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from adverse harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; opportunities to incorporate biodiversity in and around developments are encouraged; planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and The Biodiversity Duty

The Natural Environment and Rural Communities (NERC) Act came into force on 1st October 2006. Section 40 of the Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act (Section 42 in Wales) requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity.' This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

D REGIONAL PLANNING POLICY

The London Plan: The Mayor's Spatial Strategy for Greater London (2011) deals with matters of strategic importance for London. Chapter 7 –London's Living Places and Spaces sets out the policy areas that impact amongst other factors the quality and function of green infrastructure and biodiversity. Policies 7.16 – Green Belt, 7.17- Metropolitan Open Land, 7.18 – Protecting local natural space and addressing local deficiency address the proposals relating to these factors.

Policy 7.16: Green Belt

Strategic- A: The Mayor strongly supports the current extent of London's Green Belt, its extension in appropriate circumstances and its protection from inappropriate development.

Planning decisions- B: The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

Policy 7.17: Metropolitan Open Land

Strategic - A: The Mayor strongly supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL.

Planning decisions - B: The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.

LDF preparation

C: Any alterations to the boundary of MOL should be undertaken by Boroughs through the LDF process, in consultation with the Mayor and adjoining authorities.

D: To designate land as MOL boroughs need to establish that the land meets at least one of the following criteria:

- a) it contributes to the physical structure of London by being clearly distinguishable from the built up area*
- b) it includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London*
- c) it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value*
- d) it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.*

Policy 7.18: Protecting local natural space and addressing local deficiency

LDF preparation

A: When assessing local open space needs LDFs should:

- a) include appropriate designations and policies for the protection of local open space*
- b) identify areas of public open space deficiency, using the open space hierarchy set out in Table 7.2 as a benchmark for all the different types of open space identified in the hierarchy*

- c) *ensure that future open space needs are planned for in areas with the potential for substantial change such as Opportunity Areas, Regeneration Areas, Intensification Areas and other local areas.*

B: Use the CABI Space/Mayor of London Best Practice Guidance 'Open Space Strategies' as guidance for developing policies on the proactive creation, enhancement and management of open space.

Connecting with London's Nature: The Mayor's Biodiversity Strategy (GLA, 2002) includes a number of policies and proposals for protecting green spaces and important species that are relevant to the site.

Proposal 3: Conserving species through the planning system states that:

"The Mayor will and boroughs should resist development that would have a significant adverse impact on the population or conservation status of protected species or priority species.

Proposal 6: Greening new developments states that:

"The Mayor will and boroughs should ensure that new development capitalises on opportunities to create, manage and enhance wildlife habitat and natural landscape. Priority should be given to sites within or near to areas deficient in accessible wildlife sites, areas of regeneration, and adjacent to existing wildlife sites".

A recent technical report (GLA, 2008) on living roofs and walls has been published to support the London Plan (2009) and the new London BAP habitat – Built Structures. In outline, it includes the following key policies;

"The major will and boroughs should expect major developments to incorporate living roofs and walls where feasible and reflect this principle in LDF policies. It is expected that this will include roof and wall planting that delivers as many of these objectives as possible;

- Accessible roof space
- Adapting to and mitigating climate change
- Sustainable urban drainage
- Enhancing biodiversity
- Improved appearance

Boroughs should also encourage the use of living in smaller developments and extensions where the opportunity arises".

E UK BAP

In 1994 the UK Government published its response to the Convention on Biological Diversity that it signed along with over 150 other nations at the Rio Earth Summit in 1992. Biodiversity – the UK Action Plan (HM Government 1994) and subsequent publications (e.g. UK Steering Group 1995) set out a programme for the national Biodiversity Action Plan (BAP), including the development of targets for biodiversity, and the techniques and actions necessary to achieve them. The national BAP includes lists of species that are of conservation concern, either because they are rare in an international or national context or have undergone serious declines in their populations in recent years. Species Action Plans have been prepared or are in preparation for a many of these species, whilst Habitat Action Plans are being produced for important or characteristic habitats identified in the plan.

F REGIONAL AND LOCAL BAPS

The UK plan also encourages the production of local Biodiversity Action Plans at the County or District level. The London Biodiversity Action Plan contains 14 Habitat Action Plans (HAPs) and 12 Species Action Plans (SAPs).

Specific HAPs listed in the London LBAPs which are of potential relevance to this site include:

- Built Structures.



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