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NEW OXFORD STREET ESTATE

PRELIMINARY ECOLOGICAL APPRAISAL

DECEMBER 2015

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NON-TECHNICAL SUMMARY

A Preliminary Ecological Appraisal was carried out across land at New Oxford Street Estate in St Giles in the London Borough of Camden on the 1st December 2015, in order to determine whether any ecological constraints could affect the proposed development at the site. Specific design proposals were unknown at the time of compiling the report however proposals are likely to include a combination of new residential dwellings plus retail and leisure facilities and associated services.

The main findings of the survey are as follows:

- The site was located within the St Giles district, in central London and covered approximately 0.1 hectares (ha). The site was dominated by a series of interconnecting buildings with discrete areas of introduced shrubbery.
- The site is not subject to any statutory or non-statutory designated sites. The closest statutory site was Camley Street Nature Park LNR, located approximately 2.2km north-east of the site. It is not anticipated that the development will have an impact upon this or any other designated sites.
- Habitats within the site were assessed as being of value to wildlife within the immediate vicinity only. Although none of the habitats were considered to be of high ecological value, the flat roof areas have the potential to support small widespread breeding birds such as feral pigeon (*Columba livia*).
- Following the initial survey, breeding birds may pose a minor constraint to works however further surveys are not considered necessary. Instead a precautionary approach to works is considered sufficient to safeguard this species group.
- Although the potential for bats was considered to be negligible based on the location of the site, should any demolition or external renovation works be required as part of the development, some precautions are recommended to ensure that in the unlikely event that if any individual bats are sheltering within any external features on the buildings, these are safeguarded during works.
- Details regarding mitigation, including precautionary working practices together with post development enhancement measures are discussed in the recommendations section of the report.



1. INTRODUCTION

Background

- 1.1 Phlorum Limited was commissioned by Rider Levett Bucknall to undertake a Preliminary Ecological Appraisal, to inform the potential ecological constraints of proposed future development of Land at New Oxford Street Estate, St Giles (hereafter referred to as "the site").
- 1.2 The purpose of the Preliminary Ecological Appraisal was:
 - to identify the major habitats present;
 - to identify the potential for any legally protected species to be present; and
 - to recommend any additional ecological surveys, if required.
- 1.3 As part of the Preliminary Ecological Appraisal, a desktop review, consultations and a site visit were carried out. The results of which were used to assess the nature conservation importance of the site and the potential of the site to support protected species.
- 1.4 Recommendations for further ecological surveys are made at the end of the report.
- 1.5 This report has been compiled in accordance with current guidelines (British Standard, 2013 and CIEEM, 2006 & 2013).
- 1.6 Specific design proposals were unknown at the time of compiling the report however proposals are likely to include a combination of new residential dwellings plus retail and leisure facilities and associated services.

Site Description

- 1.7 The site is located within the bounds of New Oxford Street, Museum Street and West Central Street in the London Borough of Camden. The site comprised a series of buildings in use as office, retail and residential units at the time of the survey. The site was bounded in all directions by roads; West Central Street was to the west and south, Museum Street to the east and New Oxford Street to the north.
- 1.8 In the wider surrounds, the landscape was dominated by a series of commercial and residential buildings within the wider Central London area.



1.9 The National Grid Reference for the site is TQ301 814 and the site measured approximately 0.1 hectares (ha).



2. METHODOLOGY

Desk Study & Consultations

2.1 The desktop study involved conducting database searches for statutory and non-statutory designated sites, legally protected species and features of interest within a 1km radius of the site. The data search was based on available information provided by the following sources:

- Greenspace Information for Greater London (GiGL);
- Multi-Agency Geographical Information for the Countryside (MAGIC, 2015);
- Ordnance Survey mapping; and
- Aerial photography.

Field Survey and Assessment

2.2 Phlorum Limited carried out an ecological survey of the site on 1st December 2015. The survey was carried out by a suitably qualified ecologist. The weather conditions during the survey were dry and overcast.

2.3 The field survey comprised a walkover inspection of the land and habitats present. The survey followed standard Phase 1 survey methodology (JNCC, 2010) and covered all accessible parts of the site, including boundary features and roof tops where safe access permitted. Habitats were described and mapped (Appendix B). A list of plant species was compiled, together with an estimate of abundance made according to the DAFOR scale (Appendix D).

2.4 This assessment provides information on the habitats in the survey area and identifies actual or potential presence of legally protected or otherwise notable species/habitats in or immediately adjacent to the site.

2.5 Photographs are provided in Appendix A.

2.6 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.



Protected Species Assessment

- 2.7 The potential for the site to provide habitat for protected species was assessed from field observations in conjunction with results of the desk study. The site was inspected for indications of the presence of protected species including:
- The presence of features on buildings, indicating potential for roosting bats *Chiroptera*, including loose or broken roof tiles, gaps in brickwork and soffits etc. Secondary evidence of bats including staining, droppings and feeding remains were also looked for; and
 - The presence of nesting habitat for breeding birds, including mature trees, dense scrub and hedgerows and direct evidence of bird nesting including bird song, old nests etc.
- 2.8 The potential presence for protected species is categorised as Negligible, Low, Moderate, High or Present, based on the findings of the field survey and on the evaluation of existing data.
- 2.9 The purpose of this assessment is to identify whether more comprehensive Phase 2 surveys for protected species or mitigation should be recommended.

Caveat

Data Search Constraints

- 2.10 It is important to note that, even where data is held, a lack of records for a defined geographical area does not necessarily mean that there is a lack of ecological interest; the area may be simply under-recorded.
- 2.11 As of April 2010, the London Bat Group requested that GiGL stop providing bat roost information. As a result, this report only contains information on which bat species have been recorded within the locality and does not specify whether records were for a roost.

Survey Constraints

- 2.12 Ecological surveys are limited by factors that affect presence of plants and animals such as seasonality. Whilst every effort has been made to provide a comprehensive description of the site, no investigation can ensure the complete characterisation of the environment.



- 2.13 The appraisal 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. This survey 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 and any direct evidence on the site. It is therefore used as a tool to recommend further protected species surveys (or other species of significant nature conservation interest) if on the basis of the preliminary assessment or during subsequent surveys, it is considered reasonably likely that protected species may be present.
- 2.14 It is however considered that the survey was sufficiently rigorous to assess the ecological value of the site.



3. BASELINE CONDITIONS

Aerial Photography and OS Maps

- 3.1 Aerial photography indicates that the site is within a densely urbanized environment within the St Giles district in central London, located to the north of the River Thames.
- 3.2 The landscape was dominated by buildings and hard-standing. Discrete areas of open green space were present to the west, north and south. The closest of which was Bloomsbury Square Gardens located approximately 230m north-west of the site.
- 3.3 There were no on-site water bodies. The closest water body was the River Thames located approximately 950m south at its closest point.

Statutory and Non-Statutory Designated Sites

Statutory Sites

- 3.4 There are no statutory designated sites within 1 km of the site.

Non-statutory Sites

- 3.5 There are six non-statutory Sites of Importance for Nature Conservation (SINCs) within a 1 km radius of the site. The closest of which was Phoenix Gardens Site of Local Importance, located approximately 345m south east of the site. These sites are summarised in Table 3.1 below.

Table 3.1: Sites of Importance for Nature Conservation within 2km of the site

SITE NAME	SINC TIER	REASON FOR DESIGNATION	AREA (ha)	DISTANCE FROM SITE (km)
Phoenix Gardens	Local	There is an open meadow area and rockery and pond. There are dense shrubberies with young trees. Many native wild flowers have been planted, including bluebell (<i>Hyacinthoides non-scripta</i>), red campion (<i>Silene dioica</i>), and wood avens (<i>Geum urbanum</i>). The pond supports diverse vegetation around its edges, including water mint (<i>Mentha aquatica</i>), yellow iris (<i>Iris pseudacorus</i>) and soft rush (<i>Juncus effusus</i>) and hard rush (<i>Juncus inflexus</i>).	0.12	0.3km south-east
Russell Square	Local	Large open space with many mature trees. These are mostly London planes (<i>Platanus x hispanica</i>). Habitats are considered to provide suitable breeding habitat for birds.	2.49	0.4km north
Lincoln's Inn Fields	Local	Largest of the London Squares with some ancient London plane and other mature trees. Lots of shrub planting.	2.92	0.5km east
Coram's Fields	Local	Mature trees and wildflower planted wildlife garden.	2.69	0.9km north east
River Thames and tidal tributaries	Metropolitan	The river comprises a number of valuable habitats found nowhere else in London. Mud-flats, shingle beach, inter-tidal vegetation and river channels.	2304.92	0.95km South
Victoria Embankment Gardens: Main Garden	Local	This garden contains substantial areas of shrubbery with scattered trees, forming a continuous belt of cover	1.87	0.95km south

		<p>almost the whole length of the north-western side. The trees are principally non-native, mainly London plane with occasional horse chestnut. The shrubbery shows great diversity of colour and form, with foliage plants such as elaeagnus (<i>Elaeagnus umbellata</i>) and castor oil plant (<i>Ricinus communis</i>),</p>		
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Habitats

Site Summary

- 3.6 The main habitats recorded within the site are described below. Additional details are shown on the Habitat Survey Map in Appendix B, and photographs are included in Appendix A.

Buildings

- 3.7 The site was dominated by a series of interconnected buildings of different ages and styles in use for commercial and residential purposes at the time of the survey. These comprised a mixture of brick built and concrete structures supporting a combination of pitched slate roof and flat bitumen felt roof sections. All were well maintained in use and in good condition at the time of the survey. A series of chimney stacks and ventilation pipes were observed throughout the various roof sections around the site.

Introduced Shrubbery

- 3.8 Discrete areas of planted shrubbery were observed at the site. These were restricted to planters on the terraces and in window boxes of residential properties across the site. Species included geranium (*Geranium* sp.), phormium (*Phormium* sp.), ivy (*Hedera helix*) and Lavender (*Lavender* sp.).



Protected Species

Legislation

- 3.9 Legislation relating to the protected species referred to in this section is included in Appendix C.
- 3.10 The following paragraphs detail the suitability of the on-site habitats to support protected species and include information from the data search for protected, rare and otherwise notable species returned within a 1km radius.

Reptiles

- 3.11 The data search did not return any records for reptiles within 1km of the site and the survey concluded that there were no on-site habitats considered suitable to support this species group.

Great Crested Newt and Other Amphibians

- 3.12 The data search did not return any records for great crested newt (*Triturus cristatus*). One record was returned for common frog (*Rana temporaria*) within 1km of the site. This was from 1999 and located approximately 890m to the north. The survey concluded that there were no on-site habitats considered suitable to support this species group.

Bats

- 3.13 A total of one recent (post 1999) record for a single bat species was returned within 1km of the site. This was common pipistrelle (*Pipistrellus pipistrellus*) located approximately 608m north of the site
- 3.14 Generally the buildings were in good condition with well fitted slate roof tiles and associated coping stones and lead flashing. Brick walls and the associated pointing was also well maintained with no gaps or cracks observed during the survey. Access was restricted to number 10 and 16 West Central Street with further access to the roof tops of 11 and 12 West Central Street. Access to these areas enabled a thorough view of the roof features across the majority of the site. Access to the northern and western roof sections of the building were not possible however these areas were viewed remotely during the survey.

- 3.15 There were a small number of discrete areas of degradation with flaking paint and cracking rendering present on the western building facades and a small hole was also noted on the south western site extent- created through a broken outfall pipe.
- 3.16 These features have the potential to provide sheltering opportunities for small numbers of bats during the active season however the site is within a well-lit area of central London and is isolated from features in the wider surrounds considered suitable for use by foraging bats, including developed tree lines, areas of grassland and woodland and water bodies. The expanse of buildings extending in all directions further reduces potential for bats to be foraging in the area which in turn reduces the potential for bats to exploit features at the site for roosting.
- 3.17 Based on the above assessment, overall the site was considered to provide **negligible** potential for roosting and foraging bats.

Birds

- 3.18 A total of two Red listed Birds of Conservation Concern¹ (BoCC) were returned by the data search which may utilise habitats within the site. Species recorded include starling (*Stunus vulgaris*) and house sparrow (*Passer domesticus*). Both of which are priority species for London² and Local Species of Conservation Concern³.
- 3.19 Black redstart (*Phoenicurus ochruros*), a Local Species of Conservation Concern has been recorded within 1km and may utilise habitats within the site.
- 3.20 Black redstart is also afforded protection under Schedule 1, Part 1 of the Wildlife and Countryside Act 1981 and is a priority species for London. There are six records of this species within 1km of the site. The most recent was recorded in 1997.

¹ Birds of Conservation Concern status is prioritised into high concern (Red), medium concern (Amber) and low concern (Green) (Eaton et al, 2009). Red-list species are those that are globally threatened according to the IUCN criteria; those whose population or range has declined rapidly in recent years; and those that have declined historically and have not shown a substantial recent recovery. Amber-list species are those with an unfavourable conservation status in Europe; those whose 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 or localised populations. Green-list species are those that fulfil none of the criteria.

² The UK List of Priority Species and Habitats contains 1150 species and 65 habitats that have been listed as priorities for conservation action under the UK Biodiversity Action Plan (UK BAP). From this list London have developed a schedule of species that are native to or have long-established naturalised populations in Greater London.

³ From the UK BAP list, London Biodiversity Partnership have included some 300 species of conservation interest occurring in London.

- 3.21 Due to the presence of Black Redstart within the locality, an assessment as to the suitability of on-site habitats was also made in relation to this species. Black redstarts require sparse 'wasteland' vegetation and expanses of stony ground for feeding. In their natural habitats in mainland Europe this species nest on cliff faces and within urban areas this species have been found to nest on vertical features such as high ledges which are considered to provide similar conditions. Ledges on buildings also provide high singing posts for mating and territory calls.
- 3.22 The site did not support any features considered suitable for foraging black redstart. Some ledges across the roof areas may provide potential nesting habitat for this species however these features were considered to be sub-optimal for this species due to an absence of sheltering provision in the form of holes/gaps or recesses within the ledges which were otherwise exposed to the elements. The remainder of the site provided limited suitability for this species to nest due to the nature of the structures which provide a range of interconnecting flat and pitched roof structures of varying heights with an absence of suitable vertical features or recessed areas for this species to exploit.
- 3.23 No nests or individuals were observed during the survey. Overall, the site was considered to provide **negligible** potential for black redstart.
- 3.24 Areas of flat roof top areas at the site provide nesting features for some widespread species including feral pigeon (*Columba livia*) and herring gull. Overall, the site was considered to provide **moderate** potential for some species of more widespread nesting bird species such as feral pigeon.

Invasive Plants

- 3.25 The data search returned 10 recent (post 1999) records for invasive plants within 1km of the site listed on the London Invasive Species Initiative (LISI), some of which are also listed on Schedule 9 of the Wildlife and Countryside Act, 1981 (as amended).
- 3.26 Of these records, four may be found within on-site habitats, including green alkanet (*Pentaglottis sempivirens*), butterfly bush (*Buddleja davidii*), Japanese knotweed (*Fallopia japonica*) and cotoneaster (*Cotoneaster spp.*), of which the latter two are also included as invasive non-native species (INNS) on Schedule 9 of the Wildlife and Countryside Act, 1981 (as amended).
- 3.27 The habitat survey did not record any invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act or listed on the LISI.

4. EVALUATION

- 4.1 On the basis of the information available from the habitat survey and desk study, the site has been evaluated in terms of its potential for biodiversity, support of protected species and habitats, and the contribution the area makes as part of the wider landscape. The nature conservation value of the site has been assessed following standard criteria developed by CIEEM (2006) and in accordance with BS 24040:2013. This is provided below.
- 4.2 The biodiversity value of protected species within the site is a preliminary evaluation based upon the desk study records, habitat suitability and the conservation status of the species in question. It should be noted that where European Protected Species (EPS) or species of Principle Importance for the Conservation of Biodiversity are present on-site they may be valued at a lower level/scale where it is considered likely that populations would not be of sufficient importance to justify designation at a higher level. However, regardless of their biodiversity value, such species are still subject to national and/or European legislation.
- 4.3 Key aspects of relevant planning policy regarding conservation, including an explanation of species referred to as being of 'Principal Importance for Conservation of Biodiversity' and European Protected Species and habitats, are provided in the Legislation section in Appendix C.

Geographic Evaluation

Features of International Importance

- 4.4 Features of International Importance are principally sites covered by international legislation or conventions. The Conservation of Habitats and Species Regulations 2010 (as amended) implements the Natural Habitats and Wild Fauna and Flora (92/43/EC) (Habitats Directive) in England and Wales. The Regulations mainly deal with the protection of sites with certain habitats and populations of species that are important for nature conservation in a European context, i.e. Special Areas of Conservation (SAC's) and Special Protection Areas (SPA's).

- 4.5 The site is not subject to any international statutory nature conservation designations and there are no sites of international importance for nature conservation within 1km of the site. The closest site of international importance is Wimbledon Common SAC located over 9.5km to the south-west. The SAC is designated for its Northern Atlantic wet heaths and European dry heath communities together with the population of stag beetle (*Lucanus cervus*) known to be supported.
- 4.6 The survey site does not provide any supporting habitat or features for this SAC.

Features of National Importance

- 4.7 Features of national importance include SSSIs which are designated under the Wildlife and Countryside Act 1981 (as amended). The site is not subject to any national statutory nature conservation designations and it is not considered that any habitats or populations or assemblages of species within the site would meet the criteria for the designation of SSSIs at an appropriate geographic level⁴.
- 4.8 The site is not subject to any national statutory nature conservation designations and there are no sites of national importance for nature conservation within 1km of the site.
- 4.9 The closest site of national importance for nature conservation is Hampstead Heath Woods SSSI located approximately 5.5km north which is designated for its long-established high forest woodlands. The site does not provide any supporting habitat or features for this statutory designated site.

Features of Regional Importance

- 4.10 The site did not include any features of value at this level neither is it likely to be selected as a SINC based on the results of the current survey.

⁴ JNCC Guidelines for selection of biological SSSIs (see <http://jncc.defra.gov.uk/page-2303#download>).



Features of District Importance

- 4.11 The closest site of borough importance for nature conservation is Camley Street Nature Park (Local Nature Reserve), located approximately 2.2km north-east of the site. The site does not provide any supporting habitat for this statutory designated site.
- 4.12 The site is small and completely developed and does not support any features that were considered to be of value at this level.

Features of Local Importance

- 4.13 The site did not support any features that were considered to be of value at this level.

Features of Value Immediate Vicinity of the project

- 4.14 The site is small and developed however roof top features provide nesting habitat for small numbers of widespread birds.

Summary

- 4.15 Overall on the basis of the survey results and the above criteria, habitats within the site are considered to be of ecological value within the immediate vicinity only. The site provides suitable habitat to support a small number of protected species including widespread breeding birds. However, populations of these are unlikely to be locally significant.

Local Plan Evaluation

- 4.16 It is considered that the statutory London Plan (2011), Camden Core Strategy (2010 - 2025) and the Unitary Development Plan (2007) (Saved Policies) contain the following nature conservation policies relevant to the site. These include any relevant 'revised' early minor alterations to the London Plan (2013) and adopted further alterations to the London Plan (2015).
- 4.17 A summary of these policies is provided below. The full text of the relevant policies is contained in the Legislation section in Appendix C and this should also be referred to.



London Plan (2011)

Policy 2.18: Green Infrastructure: The Network of Open and Green Spaces

- To protect, promote, expand and manage the extent and quality of, and access to, London's network of green infrastructure;
- the delivery of green infrastructure will be pursued by working in partnership with all relevant bodies, including across London's boundaries, as with the Green Arc Partnerships and Lee Valley Regional Park Authority;
- enhancements to London's green infrastructure should be sought from development and where a proposal falls within a regional or metropolitan park deficiency area; and
- development proposals should incorporate appropriate elements of green infrastructure that are integrated into the wider network and encourage the linkage of green infrastructure and develop new links, utilising green chains, street trees, and other components of urban greening.

Policy 5.3: Sustainable Design and Construction

- Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance and this should be clearly demonstrated within a design and access statement. The standards include measures to achieve other policies in this Plan and include promoting and protecting biodiversity and green infrastructure.

Policy 7.19: Biodiversity and Access to Nature

- To ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity through taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans;
- development proposals will not adversely affect the integrity of any European site of nature conservation importance (to include special areas of conservation (SACs), special protection areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects; and



- development proposals should:
 - Wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity;
 - prioritise assisting in achieving targets in biodiversity action plans and/or improve access to nature in areas deficient in accessible wildlife sites; and
 - not adversely affect the integrity of European sites, and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species, or a priority species or habitat.

Camden Core Strategy (2010 - 2025)

POLICY CS15: Protecting and Improving our Parks and Open Spaces and Encouraging Biodiversity

- Expecting the provision of new or enhanced habitat, where possible, including through biodiverse green or brown roofs and green walls;
- identifying habitat corridors and securing biodiversity improvements along gaps in habitat corridors;

Unitary Development Plan (2007) (Saved Policies)

POLICY N5: Biodiversity

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

POLICY N7: protected species and their habitats

- 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.



5. CONCLUSIONS AND RECOMMENDATIONS

Conclusions

- 5.1 The site was located within the St Giles district, in central London and covered approximately 0.1ha. The site was dominated by a series of interconnecting buildings with discrete areas of introduced shrubbery.
- 5.2 In the wider surrounds, the landscape was dominated by a series of commercial and residential buildings within the wider central London area.
- 5.3 The site is not subject to any statutory or non-statutory designated sites. The closest statutory site was Camley Street Nature Park LNR, located approximately 2.2km north-east of the site. It is not anticipated that the development will have an impact upon this or any other designated site in the wider landscape.
- 5.4 Habitats within the site were assessed as being of value to wildlife within the immediate vicinity only. Although none of the habitats were considered to be of high ecological value, the flat roof areas have the potential to support small widespread breeding birds such as feral pigeon and herring gull.
- 5.5 Following the initial survey, breeding birds may pose a minor constraint to works however further surveys are not considered necessary. Instead a precautionary approach to works is considered sufficient to safeguard this species group.
- 5.6 Although the potential for bats was considered to be negligible based on the location of the site, should any demolition or external renovation works be required as part of the development, some precautions are recommended to ensure that in the unlikely event that if any individual bats are sheltering within any external features on the buildings, these are safeguarded during works.
- 5.7 Details regarding mitigation measures and site enhancement options are provided in the recommendations section.

Recommendations

Breeding Birds

- 5.1 Roof tops provide suitable nesting habitat for some widespread bird species. All nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended).