The Ecology Consultancy

17 Charterhouse Street, London / Preliminary Ecological Appraisal / Report for Anglo American and De Beers

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17 Charterhouse Street, London

Preliminary Ecological Appraisal

Report for Anglo American and De Beers

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Summary of key issues

The Ecology Consultancy was commissioned to carry out a Preliminary Ecological Appraisal (PEA), comprising a Phase 1 habitat survey, protected species assessment and ecological evaluation of land at 17 Charterhouse Street, London. The main findings of the PEA are as follows:

- The site does not form part of any statutory or non-statutory nature conservation site.
- The site comprised buildings and hardstanding with smaller areas of introduced shrub. All habitats are of value within the immediate vicinity of the site only.
- **Breeding birds** – buildings and introduced shrubs on site have potential to support breeding birds. Where these features are to be affected they should be removed outside of the breeding bird season or cleared under the supervision of an ecologist.
- Recommendations to enhance the biodiversity value of the site in accordance with national and local planning policies comprise installation of a biodiverse green roofs, planting schemes of value to wildlife and bird nesting opportunities.

1 Introduction

BACKGROUND TO COMMISSION

1.1 The Ecology Consultancy was commissioned to carry out a Preliminary Ecological Appraisal (PEA) of the site known as 17 Charterhouse Street, London in July 2017.

SCOPE OF THE REPORT

1.2 The aim of this appraisal is to provide current baseline ecological information of the site. This will be used to identify any potential ecological constraints associated with the Proposed Development and/or to identify the need for additional survey work to further evaluate any impact that may risk contravention of legislation or policy relating to protected species and nature conservation. Where necessary, avoidance, mitigation/compensation and/or enhancement measures have been recommended to ensure compliance.

1.3 This appraisal is based on the following information sources:

- a desk study of the site and land within a 1 kilometre (km) surrounding radius;
- a Phase 1 habitat survey (JNCC, 2010) of the site to identify and map the habitats present;
- a protected species assessment of the site to identify features with potential to support legally protected species; and
- an evaluation of the site's importance for nature conservation.

1.4 This appraisal has been prepared with reference to best practice guidance published by the Chartered Institute for Ecology and Environmental Management (CIEEM, 2013) and as detailed in British Standard 42020:2013 *Biodiversity - Code of Practice for Biodiversity and Development* (BSI, 2013).

1.5 The survey and assessment were conducted by Wendy MacFarlane MA, MSc,MCIEEM, who is competent in carrying out Phase 1 habitat surveys and protected species assessments and who holds a level 4 Field Identification Survey Certificate (FISC). This report was written by Matt Pendry BSc GradCIEEM, an ecologist with over four years' experience.

SITE CONTEXT AND STATUS

1.6 The site is approximately 0.49 hectares (ha) in size and is centred on Ordnance Survey National Grid reference TQ 282 967. The site is located 80 metres (m) south-west of Farringdon Station in London and is bordered by Saffron Hill and Anglia Ruskin University to the east, Charterhouse Street to the south, and office buildings to the west and north. The wider surrounding area is urban and comprises a mix of residential areas and office spaces.

DEVELOPMENT PROPOSALS

1.7 The current development proposal is for the refurbishment, extension and demolition of parts of the existing site and the creation of new commercial floor space.

RELEVANT LEGISLATION AND PLANNING POLICY

1.8 The following key pieces of nature conservation legislation are relevant to this appraisal. A more detailed description of legislation is provided in Appendix 5:

- The Conservation of Habitats and Species Regulations 2010 (as amended) (commonly referred to as the Habitats Regulations);
- Wildlife and Countryside Act 1981 (as amended);
- Natural Environment and Rural Communities Act 2006;
- Protection of Badgers Act 1992; and
- Wild Mammals (Protection) Act 1996.

1.9 The National Planning Policy Framework (Department of Communities and Local Government, 2012) requires local authorities to avoid and minimise impacts on biodiversity and, where possible, to provide net gains in biodiversity when taking planning decisions.

1.10 The London Plan: The Spatial Strategy for Greater London (Consolidated with Alterations Since 2011) (GLA, 2016) deals with matters of strategic importance for spatial development in London, including policies regarding protection, enhancement, creation, promotion and management of biodiversity and green infrastructure in support of the Mayor's Biodiversity Strategy (GLA, 2002), and urban greening to mitigate the effects of climate change.

1.11 Other planning policies at the local level which are of relevance to this development include Strategic Policy A3 of Camden's Local Development Framework Development

Planning Document Core Strategy (2012). Further information is provided in Appendix 4.

2 Methodology

DESK STUDY

2.1 The following data sources were reviewed to provide information on the location of statutory designated sites[1], non-statutory designated sites[2], legally protected species[3], Species and Habitats of Principal Importance[4] and other notable species[5] and notable habitats[6] that have been recorded within a 1km radius of the site:

- Greenspace Information for Greater London (GiGL), the local Biological Records Centre, principally for species records and information on non-statutory sites;
- MAGIC (http://www.magic.gov.uk/) - the Government's on-line mapping service; and
- Ordnance Survey mapping and publically available aerial photography.

HABITAT SURVEY

2.2 A habitat survey of the site was carried out on 11 July 2017 in clear and dry conditions. As access was restricted due to private ownership of the properties, only areas and buildings viewable from the site boundary were surveyed. Habitats were described and mapped following standard Phase 1 habitat survey methodology (JNCC, 2010). Habitats were marked on a paper base map and subsequently digitised using ESRI ArcGIS for Desktop software. Habitats were also assessed against descriptions of Habitat of Principal Importance as set-out by the JNCC (BRIG, 2008)[7].

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1 Statutory designations include Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites, National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR).

2 Non-statutory sites are designated by local authorities (e.g. Sites of Importance for Nature Conservation or Local Wildlife Sites).

3 **Legally protected species** include those listed in Schedules 1, 5 or 8 of the Wildlife and Countryside Act 1981; Schedule 2 of the Conservation of Habitats and Species Regulations 2010 (as amended); or in the Protection of Badgers Act 1992 (as amended).

4 **Species of Principal Importance** are those listed on Section 41 of the Natural Environment and Rural Communities Act, 2006.

5 **Notable species** include Species of Principal Importance under the Natural Environment and Rural Communities Act 2006; Local Biodiversity Action Plan (LBAP) species; Birds of Conservation Concern (Eaton *et al*., 2015); and/or Red Data Book/nationally notable species (JNCC, undated).

6 **Notable habitats** include Habitats of Principal Importance under the Natural Environment and Rural Communities Act, 2006; those included in an LBAP; Ancient Woodland Inventory sites; and Important Hedgerows as defined by the Hedgerow Regulations 1997.

7 Data required to confirm that certain habitats (including rivers and ponds) meet criteria for Habitats of Principal Importance is beyond that obtained during a Phase 1 habitat survey. In these cases the potential for such habitats to meet relevant criteria is noted but further surveys to confirm this assessment may be recommended

2.3 Records for dominant and notable plants are provided, as are incidental records of birds and other fauna noted during the course of the habitat survey.

2.4 Common names are used where widely accepted for amphibians, birds, fish, mammals, reptiles and vascular plants. Scientific names are provided for other groups but at first mention only if there is also an accepted common name.

2.5 The site was also surveyed for the presence of invasive plant species as defined by Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). However, detailed mapping of such species is beyond the scope of this commission and the locations on the habitat plan are indicative only.

2.6 Target notes are used to provide information on specific features of ecological interest (e.g. a badger sett) or habitat features that were too small to be mapped.

PROTECTED AND NOTABLE SPECIES ASSESSMENT

2.7 The suitability of the site for legally protected species was assessed on the basis of relevant desk study records[8] combined with field observations from the habitat survey. The likely value of habitat for protected species occurrence was ranked on a scale from 'negligible' to 'present' as described in Table 2.1.

2.8 The assessment of habitat suitability for protected or notable species was based on professional judgement, drawing on experience of carrying out surveys of a large number of urban and rural sites, and best practice survey guidance on identifying field signs which includes that for the following species: badger (e.g. Roper, 2010); bats (Collins (ed.), 2016); hazel dormouse (English Nature, 2006); great crested newt (Langton *et. al.* 2001); otter (Chanin, 2003); reptiles (Gent and Gibson, 2003); and water vole (Strachan *et al.,* 2011).

Table 2.1: Protected species assessment categories

Category	Description
Present	Presence confirmed from the current survey or by recent, confirmed records.
High	Habitat present provides all of the known key requirements for a given species/species group. Local records are provided by desk study. The site

[8] Primarily dependent on the age of the records, distance from the site and types of habitats at the site.

	is within or close to a national or regional stronghold for a particular species. Good quality surrounding habitat and good connectivity.
Moderate	Habitat present provides all of the known key requirements for a given species/species group. Several desk study records and/or site within national distribution and with suitable surrounding habitat. Factors limiting the likelihood of occurrence may include small habitat area, barriers to movement and disturbance.
Low	Habitat present is of relatively poor quality for a given species/species group. Few or no desk study records. However, presence cannot be discounted on the basis of national distribution, nature of surrounding habitats or habitat fragmentation.
Negligible	Habitat is either absent or of very poor quality for a particular species or species group. There were no desk study records. Surrounding habitat 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.

2.9 The findings of this assessment establish the need for protected species surveys that are required to achieve compliance with relevant legislation. Surveys are commonly required for widespread species such as bats, great crested newt, reptiles and badger; but may be necessary for other species if suitable habitat is present.

2.10 Surveys may be required where a site is judged to be of low suitability for a particular species/species group. However, in some cases there may be opportunities to comply with legislation, without further survey, through precautionary measures prior to and during construction.

SITE EVALUATION

2.11 The site's ecological value has been evaluated broadly following guidance issued by CIEEM (2016) which ranks the nature conservation value of a site according to a geographic scale of reference: international, national, regional, county/metropolitan, district/borough, local/parish or of value at the site scale. In evaluating the nature conservation value of the site the following factors were considered: nature conservation designations; species/habitat rarity; naturalness; fragility and connectivity to other habitats.

2.12 An initial assessment of the site's contribution to green infrastructure and ecosystem services, as recommended by *BS 42020:2013 Biodiversity. Code of practice for planning and development,* is also included.

DATA VALIDITY AND LIMITATIONS

2.13 Every effort has been made to provide a comprehensive description of the site; however, the following limitations apply to this assessment:

- The protected species assessment provides a preliminary view of the likelihood of protected species occurring on the site. It should not be taken as providing a full and definitive survey of any protected species group. Additional surveys may be recommended if, on the basis of the preliminary assessment or during subsequent surveys, it is considered reasonably likely that protected species may be present.
- The ecological evaluation is preliminary and may change subject to the findings of further ecological surveys (should these be required).
- Even where data for a particular species group is provided in the desk study, a lack of records for a defined geographical area does not necessarily mean that there is a lack of ecological interest; the area may simply be under-recorded.
- Where only four figure grid references are provided for protected species by third parties, the precise location of species records can be difficult to determine and they could potentially be present anywhere within the given 1km x 1km square. Equally six figure grid references may be accurate to the nearest 100m only.
- The Phase 1 habitat survey does not constitute a full botanical survey or provide accurate mapping of invasive plant species.
- Ecological survey data is typically valid for two years unless otherwise specified.

2.14 Despite these limitations, it is considered that this report accurately reflects the habitats present, their biodiversity values and the potential of the site to support protected and notable species.

3 Results

DESIGNATED SITES

Statutory designated nature conservation sites

3.1 The site is not subject to any statutory nature conservation designations and no statutory sites are present within 1km of the site.

3.2 The site lies within the Impact Risk Zone (IRZ) of Walthamstow Marshes SSSI, located 6.6km south of the site. IRZs are intended as a tool for local planning authorities to identify when specific types of development may require consultation with Natural England regarding their potential impact on statutory designated sites. The Proposed Development does not however fall into any of the categories where the local planning authority would need to consult with Natural England.

Non-statutory designated nature conservation sites

3.3 The site is not subject to any non-statutory nature conservation designations. Seven non-statutory sites designated as Sites of Importance for Nature Conservation (SINCs) are present within 1km of the site, comprising one Site of Metropolitan Importance to Nature Conservation (SMINC), two Sites of Borough Importance for Nature Conservation (SBINC), and four Sites of Local Importance for Nature Conservation (SLINC) (see Table 3.1).

Table 3.1: Non-Statutory Designated Sites

Site Name	Distance from site and orientation	Reason for designation
River Thames and tidal tributaries SMINC	830m south	The River Thames contains a number of valuable habitats found nowhere else in London. The mud flats, shingle beach, intertidal vegetation, islands and channel itself support many species which are rare in London. The river walls also provide important feeding areas for the nationally rare and protected black redstart.
Charterhouse	430m north-east	A series of richly planted ornamental gardens situated around the historic complex of buildings which comprise London Charterhouse. These gardens are of high value to birds and invertebrates on account of the large range of pollen, nectar and nesting/burrowing habitats they provide.
The Barbican and St Alphage's Gardens	672m north-east	A mix of Roman and medieval London architecture, supporting a range of wildlife.

Table 3.1: Non-Statutory Designated Sites

Site Name	Distance from site and orientation	Reason for designation
Temple Gardens	680m south	One of the largest open spaces in the City, with a number of features of wildlife value, supporting a range of birds.
St Johns Gardens	205m north-east	Formerly part of the graveyard of nearby St John's Chapel, this tiny park has a high density of mature trees
Lincoln's Inn Fields	618m west	The largest of London's squares containing some of the oldest and largest London plane trees in the city.
Spa Fields Gardens	655m north	A medium sized, recently landscaped park with a range of habitats including species-rich ornamental flower beds, amenity grassland lawns, areas where ornamental grape vines are being grown, scattered trees and ornamental shrubberies.
St Paul's Cathedral gardens	680m south-east	A historically important garden containing a variety of mature trees.
Roman Wall, Noble Street	714m east	A section of a Roman wall supporting a diverse flora.
Skinner Street Open Space	792m north	A diverse park containing areas of amenity lawn and mature trees supporting a balance of amenity and wildlife planting and includes innovative combinations of different habitat types.
Wilmington Square	845m north	A small town square planted with a wide range of native trees and shrubs.
Fortune Street Garden	870m north-east	A small pocket park with a good balance of wildlife habitats vs areas set aside for amenity use.
Victoria Embankment Gardens: Temple Section	872 south-west	This small public park supports a wide range of common birds for its size
Aldermanbury Gardens	893m east	A former churchyard supporting a number of interesting ferns and lichens.
Calthorpe Community Garden	935m north-west	A community garden, located in a very built up area of London, with a good range of wildlife habitats.
Coram's Field	980m north-west	A large park featuring many mature London plane trees.

PHASE 1 HABITAT SURVEY

Overview

3.4 The site predominantly comprised buildings surrounding a central courtyard containing concrete raised planters.

3.5 Phase 1 habitat types are mapped in Appendix 1, Figure 1, and areas are given in Table 3.2. A description of dominant and notable species and the composition of each habitat is provided below.

Table 3.2: Phase 1 Habitat Areas

Phase 1 Habitat	Extent (m^2)	%
Buildings	3,713	75.6
Hard standing	1093	22.3
Introduced shrubs	103	2.1
Total	4909	100

Habitat description

Buildings and hardstanding

3.6 The site largely comprised a series of connected buildings surrounding a central courtyard (Appendix 2, Photograph 1).

3.7 The southern building section was seven storeys high with a stone façade and metal panelling around the windows. The roof was flat and featured a helipad. The south-east section was five storeys high, with a flat roof. The first storey comprised a stone façade and other storeys comprised metal panelling and glass windows. The north-east section was also five storeys high with a flat roof. All elevations comprised metal panelling around glass windows. The western section was four to five storeys with flat roofs and roof terraces. All elevations comprised solid brick walls. All building sections were in good condition.

3.8 The central courtyard comprised a combination of flagstone and brick paving.

Introduced shrub

3.9 Introduced shrub was present in raised stone planters in the central courtyard. Species included locally abundant cherry laurel, red robin and spotted laurel (Appendix 1, Photograph 3).

PROTECTED AND INVASIVE SPECIES ASSESSMENT

3.10 The potential for the site to support protected species has been assessed using criteria provided in Table 3.3 based on the results of the desk study and observations made during the site survey of habitats at the site. Other legally protected species are not referred to as it is considered that the site does not contain habitats that would be suitable to support them. The following species/species groups are potentially present at the site:

- bats;
- breeding birds; and,

- invasive plant species.

3.11 The table also summarises relevant legislation and policies relating to protected species. Key pieces of statute are summarised in Section 1 and set-out in greater detail in Appendix 4.

Table 3.3: Protected Species Assessment

Habitat/ species	Status [9, 10]	Likelihood of occurrence
Bats	HR WCA S5 SPI LBAP	The data search returned records for two bat species, with the most recent records 638m north of the site in 2012 for common and soprano pipistrelle. The site is located in an urban context with a. extensive network of intensively lit streets and buildings separating the site from any suitable foraging habitat, the closest of which was over 1km from the site. As such the site is unlikely to support commuting and foraging bats. **Buildings - Negligible**: No potential roosting features of value to bats were observed on buildings on site. **As the site has no potential to support roosting bats, they are not discussed further in this report.**
Breeding birds	WCA S5 SPI LBAP BoCC	**Low**: The desk study returned numerous records of bird species. Those Species of Principal Importance and London BAP species that could potentially utilise the site include herring gull and house sparrow which are both BoCC Red List species. Shingle on some areas of flat roof provided suitable nesting areas for herring gull and ledges and alcove of parts of the building were suitable to support feral pigeon. Introduced shrub in the central courtyard provided suitable nesting habitat for widespread bird species. **As habitat suitable for breeding birds will be removed as part of the Proposed Development they are considered further in Section 4 of this report.**
Invasive species	WCA S9	**Negligible:** No invasive species were noted during the survey. **As invasive species were not recorded onsite, they are not considered further in this report.**

[9] The following abbreviations have been used to signify the legislation regarding different species: HR = Conservation of Habitats and Species Regulations 2010 (as amended); WCA S1 = Schedule 1 of the Wildlife and Countryside Act 1981 (as amended); WCA S5 = Schedule 5 of the Wildlife and Countryside Act 1981 (as amended); WCA S9 = Schedule 9 of the Wildlife and Countryside Act 1981 (as amended); PBA = Protection of Badgers Act, 1992; WMA = Wild Mammals (Protection) Act, 1996.

[10] The following abbreviations have been used to signify the policy of conservation assessments applying to notable species: SPI = Species of Principal Importance under the NERC Act 2006; LBAP = Local Biodiversity Action Plan species; BoCC = Birds of Conservation Concern - amber list / red list (Eaton *et al.*, 2015); and/or RD/NN = red data book/nationally notable species (JNCC, undated).

NATURE CONSERVATION EVALUATION

3.12 The site comprised a limited range of commonly occurring and widespread habitats which are considered to be of value within the immediate vicinity of the site.

3.13 The habitats on site were suitable for a range of protected and notable species, including Species of Principal Importance and London BAP species, as follows:

- house sparrow and other widespread but declining species of bird which are also species of conservation concern[11].

3.14 If present, any populations of these species are unlikely to exceed local value, but this can only be confirmed through further survey. Measures to mitigate potential impacts on them are recommended. It is considered unlikely that the site would support any other protected or rare species, or diverse assemblages or large populations of these species

[11] Birds of Conservation Concern - amber list / red list (Eaton *et al*., 2015);

4 Potential Impacts and Recommendations

4.1 This section summarises the potential impacts on habitats and protected and notable species that may be present at the site. The impact assessment is preliminary and further detailed assessment and surveys will be required to assess impacts and design suitable mitigation, where appropriate.

4.2 The following key ecological issues have been identified:

- habitat suitable for breeding birds is present – measures must be taken to avoid killing birds or destroying their nests; and
- a range of measures should be undertaken to satisfy the requirement for ecological enhancement included in planning policy.

CONSTRAINTS AND MITIGATION/COMPENSATION

Habitats

4.3 Approximately 103m^2 of introduced shrub will be removed as a result of the proposed development. These habitats are common and widespread in the locality and no particular constraints were identified in relation to the intrinsic value of the habitats present.

4.4 Working under the principle of 'net-gain' as supported by planning policy, any habitats to be removed should be compensated for through soft landscaping proposals including green roofs and planting schemes of recognised value to wildlife.

Breeding birds

4.5 All breeding birds and their nests are protected under the Wildlife and Countryside Act 1981 (as amended).

4.6 Where the proposed works require the removal of buildings or introduced shrub, with potential to support breeding birds, this should be carried out between September to February inclusive, to avoid any potential offences relating to breeding birds during their main bird breeding season (Newton *et al.*, 2011).

4.7 Where this is not possible, a check for nesting birds up to 48 hours prior to vegetation clearance/building works must be undertaken by an experienced ecologist and if any nests are found, the nests must be protected until such time as the young have left the

nest, as confirmed by an ecologist. If any nesting birds are found at any time during clearance works, works within the immediate surroundings of the nests must stop immediately and an ecologist consulted.

Other protected species

4.8 Works must stop immediately and advice sought from a suitably qualified ecologist in the unlikely event that any protected species are found during site clearance or construction.

FURTHER SURVEY REQUIREMENTS

4.9 Table 4.1 lists further survey requirements as recommended in the constraints section.

Table 4.1: Further survey requirements

Species/ Habitat	Survey Requirement	Number of surveys and seasonal considerations
Birds	Nesting bird check	If demolition/vegetation clearance is carried out between September and the end of February, no survey is required. Otherwise, individual surveys are required up to 48 hours prior to demolition/vegetation clearance works (Newton et al., 2011)

OPPORTUNITIES FOR ECOLOGICAL ENHANCEMENT

4.10 Planning policy at the national and local level and strategic biodiversity partnerships encourage inclusion of ecological enhancements in development projects. Ecological enhancements can also contribute to green infrastructure and ecosystem services such as storm water attenuation and reducing the urban heat island effect. The following measures would be suitable for integration into the site's design, but would require a more detailed design to successfully implement.

Biodiverse / Biosolar Roof

4.11 It is recommended that the development be enhanced through the addition of areas of biodiverse / biosolar roof on the proposed buildings. To demonstrate the highest feasible and viable sustainability standards in line with London Plan Policies (GLA 2016) it is recommended that a specification for a biodiverse / biosolar roof be drawn up by a company with a proven track record in delivering these features in London. Any biodiverse green roof should support at least 25 plant species.

4.12 A biodiverse green roof would provide additional benefits such as protecting and prolonging the life of the roof membrane, reducing building energy use by insulating the building in winter and keeping it cooler in summer, providing a SuDS function by reducing storm water run-off from the roof, reducing the urban heat island effect and local air/noise

pollution. Combining a biodiverse roof with PV panels (biosolar roof) would also provide further benefits, such as the cooling effect the vegetation has on the PV cells, increasing their productivity in hot weather, as well as resulting in a more efficient use of roof space.

4.13 The green roof should follow UK standards (GRO, 2014) and include additional habitat features such as deadwood and varying substrate depths. This will provide good habitat for a range of insects and birds including London Biodiversity Action Plan (BAP) species.

Native scrub and tree planting

4.14 It is recommended that native tree and scrub species are included within any landscaping to enhance the site. It is recommended wildlife planting should be integral to any soft landscape plans and should include native species and/or species of recognised wildlife value[12]. The use of nectar-rich and berry producing plants will attract a wider range of insects, birds and mammals and continue to accommodate those already utilising the site. Where possible, larger shrubs/trees should be under-planted to create greater structure and cover for wildlife. The use of block planting of single species should be avoided in favour of a higher diversity of plant types per square metre.

Good horticultural practice

4.15 Good horticultural practice should be utilised, including the use of peat-free composts, mulches and soil conditioners, native plants with local provenance and avoidance of the use of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

Provision of bird nesting opportunities

4.16 Nest boxes suitable to support black redstart should be mounted at roof level on the proposed buildings, in close proximity to the biodiverse roofs. Woodcrete nest boxes suitable to support house sparrow should also be positioned in the courtyard areas on site. Woodcrete boxes are recommended as they are long lasting compared to wooden boxes and insulate occupants from extremes of temperature and condensation. These should be secured using galvanised nails/screws and should be accessible for maintenance.

[12] For example The Royal Horticultural Society (RHS) Perfect for Pollinators Scheme https://www.rhs.org.uk/science/conservation-biodiversity/wildlife/encourage-wildlife-to-your-garden/plants-for-pollinators and the joint RHS/Wildlife Trust's Gardening With Wildlife In Mind Database http://www.joyofplants.com/wildlife/home.php

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Appendix 1: Habitat Map

Figure 1: Habitat Survey Map

Appendix 2: Photographs

Photograph 1
North-east and western building sections around the central courtyard.

Appendix 3: Plant Species List

Plant Species List for 17 Charterhouse Street, London compiled from Phase 1 habitat survey carried out on 11 July 2017.

Scientific nomenclature and common names for vascular plants follow Stace (2010). 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 results section of this PEA.

Abundance was estimated using the DAFOR scale as follows:
D = dominant, A = abundant, F = frequent, O = occasional, R = rare, L = locally
c=clumped, e=edge only, g=garden origin, p=planted, y = young, s=seedling or sucker, t=tree, h=hedgerow, w=water

Latin Name	Common name	Abundance	Qualifiers
Prunus laurocerasus	Cherry laurel	O LA	p s
Photinia sp.	Red robin	O LA	p s
Aucuba japonica	Spotted laurel	R	p s
Cordyline sp.	Cordyline	R	p t

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 Directive[13] 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 by development activities, include herpetofauna (amphibians and reptiles), badger, bats, birds,

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

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 (as amended) 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 capturing of Schedule 2 species (e.g. all 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

- Keeping, transporting, selling, exchanging or offering for sale whether live or dead or of any part thereof.

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

- Intentional or reckless disturbance (at any level);
- Intentional or reckless obstruction of access to any place of shelter or protection:
- Selling, offering or exposing for sale, possession or transporting for purpose of sale.

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

A European Protected Species Mitigation (EPSM) Licence issued by the relevant countryside agency (e.g. Natural England) will be required for works liable to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficacy to be 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 areas is crucial to maintaining the integrity of a local population.

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 breeding season which typically runs from March to August[14]. 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 breeding 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

[14] 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.

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.

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 nm 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.' They are referred to in this report as Species of Principal Importance and Habitats or Principal Importance. 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 (2016): The Mayor's Spatial Strategy for Greater London

The 2016 London Plan includes all updates since its previous 2011 version and deals with matters of strategic importance for spatial development in London, including policies regarding protection, enhancement, creation, promotion and management of biodiversity and green infrastructure in support of the Mayor's Biodiversity Strategy (GLA, 2002), and urban greening to mitigate the effects of climate change. Policies 5.10 – 'urban greening', and 7.19 – 'Biodiversity and access to nature', are relevant to the development proposal and are detailed below.

Climate change adaptation - Policy 5.10 Urban Greening

Strategic

A The Mayor will promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.

B The Mayor seeks to increase the amount of surface area greened in the Central Activities Zone by at least five per cent by 2030, and a further five per cent by 2050.

Planning decisions

C Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping. Major development proposals within the Central Activities Zone should demonstrate how green infrastructure has been incorporated.

LDF preparation

D Boroughs should identify areas where urban greening and green infrastructure can make a particular contribution to mitigating the effects of climate change, such as the urban heat island.

Climate change adaptation - Policy 5.11 Green roofs and development site environs

Planning decisions

A Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many of the following objectives as possible:

a adaptation to climate change (ie aiding cooling)

b sustainable urban drainage

c mitigation of climate change (ie aiding energy efficiency)

d enhancement of biodiversity

e accessible roof space

f improvements to appearance and resilience of the building

g growing food.

LDF preparation

B Within LDFs boroughs may wish to develop more detailed policies and proposals to support the development of green roofs and the greening of development sites. Boroughs should also

promote the use of green roofs in smaller developments, renovations and extensions where feasible.

Protecting London's open and natural environment - Policy 7.19 Biodiversity and access to nature

Strategic

A The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.

B Any proposals promoted or brought forward by the London Plan 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. Whilst all development proposals must address this policy, it is of particular importance when considering the following policies within the London Plan: 1.1, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 2.9, 2.10, 2.11, 2.12, 2.13, 2.14, 2.15, 2.16 and 2.17, 3.1, 3.3, 3.7, 5.4A, 5.14, 5.15, 5.17, 5.20, 6.3, 6.9, 7.14, 7.15, 7.25, 7.26 and 7.27 and 8.1. Whilst all opportunity and intensification areas must address the policy in general, specific locations requiring consideration are referenced in Annex 1.

Planning decisions

C Development Proposals should:

a. wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity

b. prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites

c. 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 identified in a UK, London or appropriate regional BAP or borough BAP.

D On Sites of Importance for Nature Conservation development proposals should:

a. give the highest protection to sites with existing or proposed international designations[1] (SACs, SPAs, Ramsar sites) and national designations[2] (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations[3]

b. give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance

d. give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.

E When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:

1 avoid adverse impact to the biodiversity interest

2 minimise impact and seek mitigation

3 only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

LDF preparation

F In their LDFs, Boroughs should:

a. use the procedures in the Mayor's Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.

b. identify areas deficient in accessible wildlife sites and seek opportunities to address them

c. include policies and proposals for the protection of protected/priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets

d. ensure sites of European or National Nature Conservation Importance are clearly identified.

e. identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites.

Connecting with London's Nature: The Mayor's Biodiversity Strategy

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".

Living Roofs and Walls; Technical Report: Supporting London Plan Policy

A technical report (GLA, 2008) on living roofs and walls has been published to support The London Plan (GLA, 2016) 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 LOCAL PLANNING POLICY

A single policy contained in Camden's Local Development Framework Development Planning Document Core Strategy is relevant to the site as shown below:

Policy A3 Biodiversity

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

a. designate and protect nature conservation sites and safeguard protected and priority habitats and species;

b. grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species;

c. seek the protection of other features with nature conservation value, including gardens, wherever possible;

d. assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed;

e. secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;

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

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

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

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

Trees and vegetation

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

We will:

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

k. require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in

relation to Design, Demolition and Construction' and positively integrated as part of the site layout;

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

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

F REGIONAL AND LOCAL BAPS

Many local authorities in the UK have also produced a local Biodiversity Action Plan (LBAP) at the County or District level. The London Biodiversity Action Plan is based on the UK list of Species and Habitats of Principal Importance and contains 214 species and 15 habitats. Camden LBAP contains six species and six habitat action plans. The only one relevant to this site is the Bats Species Action Plan.

The Ecology Consultancy is part of the Temple Group.

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