Gondar Gardens Covered Reservoir

Planning Application Review

For

Camden Council

December 2017

72 Sonning Gardens
Hampton
Middlesex
TW12 3PN
T – 020 8979 7810
M – 07813 329396
E - enquiries@salixecology.co.uk
W – www.salixecology.co.uk

Contents

1.0 Introduction 3
2.0 Methods 3
2.1 Ecology reports 3
2.2 Planning policy 5
2.3 Legislation 6
3.0 Planning application assessment 6
3.1 Ecological Appraisal 6
3.2 Bat Activity survey 8
3.3 Breeding bird survey 9
3.4 Reptile survey 10
3.5 Reptile Mitigation Strategy 11
3.6 Ecological 10 year Management Plan 12
3.7 Landscape and Ecological Mitigation review 12
3.8 Executive Summary 12
3.9 Planning Policy 13
3.10 Legislation 13
4.0 Conclusions 14
5.0 Recommendations 15
6.0 References 16

1.0 Introduction

1.1 Salix Ecology was commissioned by the London Borough of Camden to carry out a review of the design, ecology proposals and mitigation for planning application number: 2017/6045/P submitted to the Council on 27/10/17:

1.2 “Partial demolition of the existing reservoir, including the roof and most of the internal structure, and the erection of six 4-6 storey buildings and four 2-3 storey link buildings with common basement levels within the retaining walls of the existing reservoir to include 82 Self-contained extra care apartments (class C2); a 15 bed nursing home (Class C2). Associated communal facilities including reception area, guest suite, lounge, restaurant, café, bar, library, exercise pool, gym, therapy rooms and cinema; Associated support facilities including staff offices, welfare and training spaces, storage, laundry, kitchen, cycle storage, car parking and plant areas and a site-wide biodiversity-led landscaping and planting scheme including external amenity space, drop off area, retention pond and slope stabilization and associated engineering works”.

1.3 The review focuses on the Ecological Appraisal of the development and will be restricted to the ecological aspects of the proposals only. The ecology report is assessed for compliance with current professional guidance and the development proposals is reviewed against the National Planning Policy Framework (NPPF), Camden Council’s policies relating to ecology as well as national legislation including the Wildlife and Countryside Act, 1981 (as amended), The Conservation of Habitats and Species Regulations (2010) and the Natural Environment and Rural Communities Act (2006).

2.0 Methods

2.1 Ecology reports

2.1.1 The ecology reports submitted with the planning application are assessed against the following guidance:

- Guidelines for Preliminary Ecological Appraisal (PEA), Second Edition (Chartered Institute of Ecology and Environmental Management, 2017)
- Guidelines for Ecological Impact Assessment in the UK and Ireland (Chartered Institute of Ecology and Environmental Management, 2016)
- Guidelines for Ecological Report Writing (Chartered Institute of Ecology and Environmental Management, 2017)
- BSI Standards Publication: Biodiversity — Code of practice for planning and development. BS 42020:13 (BSI, 2013)
- Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2016)
- Herpetofauna Workers Manual (Gent and Gibson, 2003)

- Reptiles: surveys and mitigation for development projects (Natural England, 2014)

- Reptile survey: An introduction to planning, conducting and interpreting surveys for snake and lizard conservation. Froglife Advice Sheet 10. Froglife (1999).

2.1.2 A Preliminary Ecological Appraisal (PEA) should accompany the planning application. The PEA should aim to identify the likely ecological constraints associated with a project; identify any mitigation measures likely to be required, follow the 'Mitigation Hierarchy'; identify any additional surveys that may be required; and identify the opportunities offered by a project to deliver ecological enhancement (Chartered Institute of Ecology and Environmental Management, 2017).

2.1.3 The appraisal should include a desk study to collect information about the site and surrounding area. This should include designated site information, species records and habitat information.

2.1.4 A field survey should be carried out which should consider both habitats and species. The survey should include the possible presence of protected and priority species as well as priority habitats. The survey should also identify any stands of invasive species and uncommon, rare or protected plants. Habitats should be mapped out and follow a recognised habitat classification.

2.1.5 The PEA should include a review of the desk study information, an assessment of the importance of habitats present and an assessment of the likely presence of protected and priority species.

2.1.6 The report should identify any ecological constraints and list further ecological surveys required to inform an Ecological Impact Assessment.

2.1.7 If further, specialist ecological surveys are required; these should follow the relevant professional guidance and submitted with the planning application. These include; Bat Surveys for Professional Ecologists: Good Practice Guidelines and the Herpetofauna Workers Manual as well as Natural England guidance.

2.1.8 An Ecological Impact Assessment (EcIA) report should also be submitted with the planning application although this may be incorporated within the PEA. The EcIA should follow the mitigation hierarchy:

- **Avoidance**: Seek options that avoid harm to ecological features

- **Mitigation**: Adverse effects should be avoided or minimised through mitigation measures, either through the design of the project or subsequent measures that can be guaranteed – for example, through a condition or planning obligation.

- **Compensation**: Where there are significant residual adverse ecological effects despite the mitigation proposed, these should be offset by appropriate compensatory measures.

- **Enhancements**: Seek to provide net benefits for biodiversity over and above requirements for avoidance, mitigation or compensation.

2.1.9 The EcIA should scope out the ecological issues to be addressed, define the project and project activities and establish the zones of influence i.e. establish the area over which ecological features may be subject to significant effect.

2.1.10 The EcIA should determine how conditions will change in relation to baseline conditions established during the PEA. The report should include an impact assessment to identify impacts, incorporate measures to avoid or mitigate impacts and identify compensation measures where mitigation is not possible or to offset residual effects. Finally the EcIA should identify opportunities for ecological enhancement.

2.2 Planning policy

2.2.1 The application is assessed against the following National Planning Policy Framework (NPPF) policies within chapter 11: Conserving and enhancing the natural environment, paragraph 118:

- If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- Development proposals where the primary objective is to conserve or enhance biodiversity should be permitted.
- Opportunities to incorporate biodiversity in and around developments should be encouraged.
- Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss..."

2.2.2 The application is also considered against the Camden Local Plan (Camden Council, 2017) with particular reference to the following paragraphs of Policy A3 Biodiversity:

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, whenever 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.

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.

2.2.3 Natural England Standing advice in relation to protected sites and species is also taken into account in the assessment of the application.

2.3 Legislation

2.3.1 The report considers whether the application has taken the presence or risk of presence of protected species protected under European and/or national legislation into account. If there is a risk of protected species on site, then appropriate surveys should be commissioned and mitigation measures identified.

2.3.2 The application should also consider the presence of Habitats and Species of Principal Importance in England into account. These are species listed in Section 41 of the Natural Environment and Rural Communities (2006). The presence of these habitats and species may be material considerations when considering a planning application.

3.0 Planning application assessment

3.1 Ecological Appraisal

3.1.1 James Blake Associates Ltd has submitted a survey entitled "Phase 1 Habitat Survey of The Covered Reservoir at Gondar Gardens, West Hampstead, London (James Blake Associates Ltd, 2016) in support of the application. The report is effectively a combination of a Preliminary Ecological Appraisal and an Ecological Impact Assessment.

Introduction

3.1.2 The Ecological Appraisal clearly sets out the author's credentials, purpose of the report, site context and outlines the aims and objectives of the survey.

3.1.3 An overview of the site and surrounding habitats are given together with the site's nature conservation designation.

Methodology

3.1.4 A desk study was undertaken in accordance with CIEEM guidelines including the commissioning of a biological datasearch for the presence of designated sites, protected and priority species.

3.1.5 An appropriate survey was undertaken using recognised methods, including an assessment of protected species.

Results

3.1.6 The results section includes an analysis of the desk study and correctly identifies both statutory and non-statutory sites within a 2km buffer zone. Protected and priority species as well as non-native invasive species which may be relevant to the site are also listed.

3.1.7 A comprehensive description of each habitat is provided with a list of characteristic species. Both common and scientific names are given in line with best practice. A small pocket of acid grassland, a habitat of Principle Importance, was identified, although from the species list provided, this appears to be severely degraded. Virginia creeper, a non-native invasive species was recorded.

3.1.8 The report includes a protected species risk assessment and identifies the potential presence of bats, common reptiles, breeding birds and stag beetle.

Impact assessment

3.1.9 The report considers the impact of the development on slow worm and suggests that there will be little impact on the species if the core area for this species is retained. No assessment is given on other features of nature conservation importance.

Recommendations

3.1.10 The appraisal does include recommendations for further survey work including undertaking bat, breeding bird and reptile surveys.

3.1.11 Recommendations to mitigate the impacts of the development include precautions for any proposed tree felling to avoid bat roosts as well as post construction advice to reduce the impacts on bats using the site. The report also recommends that trees and boundary vegetation are retained to provide habitat for breeding birds and that site clearance should avoid the bird breeding season.

3.1.12 Various other recommendations are provided, particularly to provide habitat for breeding birds and roosting bats. The report also recommends the retention of some areas of grassland and future management of this habitat for nature conservation. The incorporation habitat for stag beetle habitat and hedgehog is also recommended.

3.1.13 The recommendations listed are logical, evidence based and would mitigate some of the impacts of the development, particularly on protected species.

3.2 Bat Activity survey

3.2.1 A Bat Activity survey of the site has been provided in support of the application (James Blake Associates, 2016).

Introduction

3.2.2 The report clearly sets out the author's credentials, purpose of the report, site context and outlines the aims and objectives of the survey.

3.2.3 An overview of the site and surrounding habitats are given together with the site's nature conservation designation.

Methodology

3.2.4 A desk study was undertaken in accordance with CIEEM guidelines including the commissioning of a biological datasearch for the presence of bats within 2km of the site.

3.2.5 Appropriate surveys were undertaken using recognised methods at an appropriate time of year and when weather conditions were suitable. The surveys included activity surveys as well as internal inspections of the underground reservoir.

Results

3.2.6 No evidence of bats was found at the reservoir and potential access to the reservoir has been blocked. It is reasonable to conclude that bats are not using the reservoir for roosting.

3.2.7 The electrical substation is also unlikely to support bat roosts. The report recommends removing ivy from the substation and re-checking the building prior to demolition. These are sensible precautions to ensure no bats are using the building or surrounding vegetation. The results also showed that it was unlikely that bats were roosting in trees within the site.

3.2.8 The activity survey did show that bats were using the site for foraging and/or commuting. This included species that are rare in London.

Impact assessment

3.2.9 The impact assessment correctly acknowledges that the site does have some importance for bats and that the development could fragment commuting routes as well as cause disturbance through the change of use.

Recommendations

3.2.10 The report recommends the retention of features used by bats and their invertebrate prey by locating buildings away from key features, protecting habitat during construction and enhancing features post construction. Precautions to reduce the impact of lighting are also recommended and provision of bat boxes on buildings to provide roosting opportunities for species using the site.

3.2.11 The report suggests that bats will not be negatively impacted by the development. It is reasonable to conclude that roosting bats will not be affected; however impacts can only be fully mitigated if the full range of precautions and enhancements are implemented.

3.3 Breeding bird survey

3.3.1 A breeding bird survey of the site has been provided in support of the application (James Blake Associates, 2016).

Introduction

3.3.2 The report clearly sets out the author's credentials, purpose of the report, site context and outlines the aims and objectives of the survey.

3.3.3 An overview of the site and surrounding habitats are given together with the site's nature conservation designation.

Methodology

3.3.4 A desk study was undertaken in accordance with CIEEM guidelines including the commissioning of a biological datasearch for the presence of birds within 2km of the site.

3.3.5 Appropriate surveys were undertaken using the BTO Breeding Bird Survey methods. The BTO method recommends two bird recording visits. The first should be carried out April to mid-May and the second at least 4 weeks later (mid-May to the end of June) (BTO, no date). Although the surveys were carried out within the accepted bird breeding season, they were carried out very late which may have resulted in the under recording of birds breeding on site. This limitation is acknowledged in the report.

Results

3.3.6 The results show that a large number of birds use the site including red and amber listed species as well as Species of Principle Importance. It is likely that a number of species breed on site.

Impact assessment

3.3.7 The report does not assess the impacts of the development on birds using the site.

Recommendations

3.3.8 The report cites a number of recommendations to mitigate impacts of the development including siting of the buildings, protection, retention and management of existing habitat as well as the provision of new habitat and bird boxes to compensate for the loss of scrub and grassland. The incorporation of green and brown roofs within the development is also recommended. The authors also suggest the production of an Ecological Action Plan to detail management needed to provide resources for birds using the site.

3.3.9 If implemented the recommendations will provide additional habitat for birds, however, given the scale of development, it is uncertain that these measures will fully compensate for the loss habitat and increased disturbance that will result from the development both during construction and use post construction.

3.4 Reptile survey

3.4.1 A reptile survey has been provided in support of the application (James Blake Associates, 2016).

Introduction

3.4.2 The report clearly sets out the author's credentials, purpose of the report, site context and outlines the aims and objectives of the survey.

3.4.3 An overview of the site and surrounding habitats are given together with the site's nature conservation designation.

Methodology

3.4.4 A desk study was undertaken in accordance with CIEEM guidelines including the commissioning of a biological datasearch for the presence of reptiles within 2km of the site.

3.4.5 Surveys were undertaken using recognised methods at an appropriate time of year and when weather conditions were suitable. Survey effort was sufficient and proportionate for the area of the site.

Results

3.4.6 The results show that the site supports a good and possibly an exceptional population of slow worms as defined by the Froglife survey assessment criteria for key reptile sites (Froglife,1999). To be considered a Key Reptile Site the site must meet one of the following criteria:

(1) supports three or more reptile species
(2) supports two snake species
(3) supports an exceptional population of one species
(4) supports an assemblage of species scoring at least 4
(5) does not satisfy 1-4 but which is of particular regional importance due to local rarity

3.4.7 An 'exceptional' population of slow worms is a record of more than 20 individuals seen by one person in one day under refugia placed at a density of up to 10 per hectare. Although the density of refugia was greater than this, the site can be considered to be a Key Reptile Site as defined by Froglife, particularly as the species is locally rare. However the report simply classifies the population as being 'good'.

Impact assessment

3.4.8 The report does not assess the impacts of the development on reptiles using the site.

Recommendations

3.4.9 The reptile survey report recommends that reptiles in the area to be disturbed should be relocated before any works take place. The receptor site should be on site or as close to the site as possible. The area to the southern and eastern boundaries should be retained, enhanced and managed for reptiles. The Reptile Mitigation Strategy provided in support of the application has provided more details (see below).

3.5 Reptile Mitigation Strategy

3.5.1 A reptile mitigation strategy has been provided in support of the application (James Blake Associates, 2016).

Introduction

3.5.2 The report provides a thorough introduction and clearly explains the need for a mitigation strategy, correctly detailing the legislation and planning policy relating to reptiles.

Methods

3.5.3 The strategy recommends translocating slow worms to an area of retained grassland within the site boundary. This area is to be enhanced to improve its suitability for the species. Temporary exclusion fencing will be installed to prevent slow worms from

being affected by construction activities. This methodology follows best practice guidelines (Natural England, 2014).

3.5.4 The report details habitat improvements for reptiles as well as how the habitat should be managed post-development. Post-translocation monitoring is also recommended to assess the success of the mitigation.

3.5.5 The recommendations are appropriate and provide suitable mitigation in principle. The mitigation report concludes that harm to reptiles during construction would be minimised and habitat management may facilitate an increase in population status. However there is a risk that post development disturbance will have a long term detrimental impact on the slow worm population. The area of habitat to be provided will also be significantly less extensive than before the development.

3.6 Ecological 10 year Management Plan

3.6.1 The London Wildlife Trust has provided a Management Plan in support of the application entitled Persephone Gardens Proposed 10 Year Management Plan 2019-28 (London Wildlife Trust, 2017).

3.6.2 The Management plan is written as though the development has been completed and, as such, makes a number of assumptions particularly in section 1.2 Description. However general management outlined follows good practice and will benefit the species currently known to use the site. The plan also highlights the importance of ongoing monitoring of key biodiversity features including grassland and reptiles.

3.7 Landscape and Ecological Mitigation review

3.7.1 A Landscape and Ecological Mitigation Review has been provided by the London Wildlife Trust (2017) in support of the application.

3.7.2 The report reviews and supports the ecology reports produced by James Blake Associates. A summary of mitigation and enhancements is provided, however the London Wildlife Trust has provided additional recommendations to maintain the SINC status of the site. Implementation of these additional measures will significantly increase the nature conservation value of the site.

3.8 Executive Summary

3.8.1 An executive summary has been provided in support of the application (James Blake Associates Ltd, 2017). A summary of mitigation measures and enhancements is also provided.

3.8.2 The summary clearly outlines the nature conservation status of the site as well as planning policy relevant to the development. A summary of all surveys carried out by James Blake Associates Ltd is also provided.

3.8.3 Predicted impacts are provided including a net loss 31.6% of semi-improved neutral grassland. The report considers that there will not be a loss of the current reptile population due to post-construction habitat works and implementation of the management plan. Impacts on birds and bats are predicted to be minimal as no bat

roosts were identified within the site and the majority of boundary trees and shrubs are to be retained.

3.8.4 In addition to various habitat enhancements for reptiles, birds and bats, a pond will be created for the benefit of wildlife.

3.8.5 The report concludes that there will be no net loss of biodiversity subject to the recommended avoidance and mitigation measures. However there is still a risk that there will be a long term negative impact on some species, especially slow worms due to habitat loss and increased disturbance.

3.9 Planning Policy

3.9.1 Chapter 11 policies: Conserving and enhancing the natural environment of the NPPF states that *"if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused"*. It is clear that without mitigation and the provision of compensatory habitat there would be a significant negative impact on protected species including birds, slow worms and, possibly, species of bat. These impacts can only be avoided if the mitigation measures outlined in the various ecology reports, especially long term post-construction habitat management for biodiversity, are fully implemented.

3.9.2 Policy A3 of the Camden Local Plan (London Borough of Camden, 2017) states that " We will *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*" The proposed development would result in the partial loss of a designated nature conservation site. Despite the mitigation proposals, there is also a significant risk that there will be an adverse impact on the status of the slow worm, a species of Principle Importance.

3.9.3 In addition paragraph 6.61 of the Local Plan states that "....In *a highly built-up area, relatively small sites can be highly valued by providing access to nature...."* The development is likely to result in a reduction in accessible natural greenspace within the borough.

3.10 Legislation

3.10.1 The Ecological Appraisal has identified the presence of legally protected species within the development site and has clearly detailed legislation relevant to these species.

3.10.2 Species identified in the Ecological Appraisal which receive legal protection and which have the potential to be affected by the development are birds, bats and slow worms. ODPM Circular 06/2005 states that '*The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat'*. The applicant has provided details as how any potential offences will be avoided.

3.10.3 For birds, confirmation will be needed that scrub and tree removal will only take place outside the bird breeding season or that if works will take place in the breeding season, additional surveys will be undertaken to identify nests so that they can be protected during demolition, construction and other landscaping works.

3.10.4 Bats are European Protected Species and receive a high level of legal protection. However the survey data provided indicates that the development is unlikely to have an impact on any bat roosts or roosting bats.

3.10.5 Slow worms are protected from killing and injury under the Wildlife and Countryside Act 1981 (as amended). The mitigation measures outlined for this species, including the installation of reptile proof fencing and the translocation of individuals to a receptor area is likely to prevent offences being committed under the act.

3.10.6 Some species of bird likely to breeding on site as well as the slow worm are Species of Principle Importance for the Conservation of Biodiversity in England. These are the species found in England which were identified as requiring action under the UK BAP and which continue to be regarded as conservation priorities under the UK Post-2010 Biodiversity Framework.

3.10.7 Species of Principle Importance are listed on section 41 of the Natural Environment and Rural Communities Act (2006). This list is used to guide decisions by local authorities in the implementation of their duty under the act to have regard to the conservation of biodiversity in England, when carrying out their normal functions i.e. their presence should be taken into account when determining planning applications.

4.0 Conclusions

4.1 Gondar Gardens Covered Reservoir Borough Grade II Site of Importance for Nature Conservation is an important site for nature conservation in the borough context. The site includes a relatively large area of species-rich semi-improved grassland. A number of plant species recorded during the Phase One Habitat survey are characteristic of unimproved conditions including bird's-foot-trefoil and meadow vetchling.

4.2 The site also supports protected species including bats, breeding birds and slow worms. Some species of bird likely to breeding on site as well as the slow worm are also Species of Principle Importance.

4.3 From the information provided, the proposed development will result in the loss of a significant area of semi-improved grassland. In the absence of mitigation, the development also has the potential to have a negative impact on protected species and Species of Principle Importance, particularly birds, bats and slow worm.

4.4 Comprehensive mitigation measures are recommended in the various documents submitted with the planning application to reduce harm to these features of importance. These include:

- Retention and management of south facing slopes for slow worms

- Retention of grassland to the east as well as boundary scrub
- Creation of hibernacula for slow worms
- Translocation of slow worms from areas to be disturbed
- Control of scrub encroachment
- Precautionary clearance of scrub and trees to protect nesting birds
- Retained features including boundary hedgerows and trees to be protected during construction
- Installation of bat boxes on retained trees and buildings
- Installation of nest boxes on new buildings or trees
- Retention of deadwood and creation of a stag beetle loggery
- Incorporation of green and brown roofs within the development
- Precautions to minimise the risk of disturbance to bats both during and post-development, particularly lighting
- Filling of gaps in boundary vegetation to improve commuting corridors for bats
- Management of retained grassland and wildflower planting for the benefit of a range of species
- Installation of a retention pond
- Monitoring features of nature conservation importance

4.5 The implementation of these mitigation measures will reduce the impact of the development on features of nature conservation importance and, with the precautions outlined in the application, any offences under wildlife legislation can be avoided.

4.6 However there remains the risk that the status of some species, particularly slow worm, will still decline as the long term success of mitigation is difficult to predict. There will also be a number of residual impacts which will not be mitigated for including:

- Loss of a significant area of Borough II Site of Importance for Nature Conservation.

- An increase in lighting and noise levels which will affect commuting and foraging bats as well as breeding birds both during and post-construction.

- The loss of a large area of species-rich semi-improved neutral grassland. Although not legally protected and not a priority habitat, this grassland is does have significant value for wildlife including foraging bats, birds and invertebrates.

- Loss of accessible natural greenspace for the local community.

4.7 The effectiveness of the mitigation measures largely depends on continued long term management of the site for nature conservation.

5.0 Recommendations

5.1 If the planning application is approved, the proposed mitigation measures listed above should be collated into one document and be subject to a planning condition. Planning conditions should ensure in particular:

- The protection of areas of scrub and grassland shown in the landscape drawings from future development.

- Future management of these areas for nature conservation, especially slow worm.

- Monitoring of incorporated nature conservation areas as detailed in the Ecological 10 year management plan (London Wildlife Trust, 2017).

- The implementation of the Ecological 10 year Management Plan (London Wildlife Trust, 2017) in accordance with the Camden Local Plan, Policy A3 Biodiversity, paragraph j (London Borough of Camden, 2017).

5.2 In addition, the applicant should provide a detailed specification for the green/ brown roofs as well as the new pond.

6.0 References

BSI (2013) *Code of practice for planning and development. BS 42020:13*. Published by BSI Standards Limited.

BTO (no date) *Breeding Bird Survey Methodology and survey design*. Available from: https://www.bto.org/volunteer-surveys/bbs/research-conservation/methodology

Chartered Institute of Ecology and Environmental Management (2016) *Guidelines for Ecological Impact Assessment in the UK and Ireland. Second Edition*. Available from: https://www.cieem.net/data/files/Publications/EcIA_Guidelines_Terrestrial_Freshwater_and_Coastal_Jan_2016.pdf

Chartered Institute of Ecology and Environmental Management (2017) *Guidelines for Preliminary Ecological Appraisal. Second Edition*. Available from: https://www.cieem.net/data/files/Publications/Guidelines_for_Preliminary_Ecological_Appraisal_Dec2017.pdf

Chartered Institute of Ecology and Environmental Management (2017) *Guidelines for Ecological Report Writing Second Edition*. Available from: https://www.cieem.net/data/files/Publications/Ecological_Report_Writing_Dec2017.pdf

Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)*. The Bat Conservation Trust, London.

Department for Communities and Local Government (2016*) Planning Practice Guidance: Natural Environment*. Available from: https://www.gov.uk/guidance/natural-environment

Froglife (1999). *Reptile survey: An introduction to planning, conducting and interpreting surveys for snake and lizard conservation.* Froglife Advice Sheet 10. Froglife, Halesworth.

Gent, T and Gibson, S. (2003) *Herpetofauna Workers Manual*. Available from http://jncc.defra.gov.uk/page-3325

James Blake Associates Ltd (2016) *Phase 1 Habitat Survey of The Covered Reservoir at Gondar Gardens, West Hampstead, London.* Available from: http://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:2017/6045/P

James Blake Associates Ltd (2016*) Bat Activity Survey of The Covered Reservoir at Gondar Gardens, London*. Available from: http://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:2017/6045/P

James Blake Associates Ltd (2016) *Breeding Bird Survey of Reservoir at Gondar Gardens, London*. Available from: http://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:2017/6045/P

James Blake Associates Ltd (2016) *Reptile Survey of The Covered Reservoir at Gondar Gardens,London*. Available from: http://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:2017/6045/P

James Blake Associates Ltd (2016) *Reptile Mitigation Strategy for The Covered Reservoir at Gondar Gardens, West Hampstead.* Available from: http://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:2017/6045/P

James Blake Associates Ltd (2017) *Executive Summary of The Covered Reservoir at Gondar Gardens, West Hampstead, London* Available from: http://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:2017/6045/P

London Borough of Camden (2017) *Camden Local Plan*. Available from: https://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-policy/local-development-framework/;jsessionid=5ADFB49595D5710410BA1B24C0AAD4FB

London Borough of Camden (2017). *Camden Planning Guidance: Biodiversity Draft*. Available from: http://camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3653436&

London Wildlife Trust (2017) *Persephone Gardens Proposed 10 Year Management Plan 2019-28*. Available from: http://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:2017/6045/P

London Wildlife Trust (2017) *Gondar Gardens Landscape and Ecological Mitigation Review*. Available from: http://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:2017/6045/P

Natural England (2014) *Reptiles: surveys and mitigation for development projects*. Available from: https://www.gov.uk/guidance/reptiles-protection-surveys-and-licences

Natural England (2015) *Bats: surveys and mitigation for development projects.* Available from https://www.gov.uk/guidance/bats-surveys-and-mitigation-for-development-projects

Office of The Deputy Prime Minister (2005) *Government circular: Biodiversity and geological conservation – statutory obligations and their impact within the planning system*. Available from: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7692/147570.pdf