ECOLOGICAL IMPACT ASSESSMENT

13 BLACKBURN ROAD, LONDON

carried out by

CLARKSON & WOODS
ECOLOGICAL CONSULTANTS

commissioned by

WEST HAMPSTEAD INVESTMENTS PARTNERSHIP LTD.

MAY 2020

ECOLOGICAL IMPACT ASSESSMENT

13 BLACKBURN ROAD, LONDON

CONTENTS

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EXECUTIVE SUMMARY

- Clarkson and Woods Ltd. was commissioned by West Hampstead Investments Partnership Ltd. to carry out an Ecological Impact Assessment at 13 Blackburn Road, West Hampstead, London, NW6 1RZ.
- The planning application seeks permission for the demolition of the existing buildings within the Site, and the construction of three new buildings, two of which will be residential, and one will be commercial offices.
- A building inspection and an Extended Phase 1 Habitat Survey was undertaken on 29th April 2020 to inform an application for the demolition of the existing buildings.
- The development Site comprised two interconnected buildings (Buildings 1 and 2), areas of hardstanding, and three non-native ornamental trees. Building 1 was an apartment block with associated amenities, and Building 2 was a warehouse/storage building.
- The removal of the cladding on Building 1 should be conducted outside of the months of August – October, in order to minimise the risks of encountering and impacting roosting bats. This work will be preceded by a toolbox talk to contractors, which will be delivered by an appropriately qualified ecologist. Best practice measures to minimise artificial light spill on to habitats within and adjacent to the Site should be implemented.
- The ornamental trees were also considered to be of very low suitability for nesting birds, and the remainder of the site was considered to be of negligible suitability for nesting birds. The ornamental trees should be removed outside of the bird nesting season (March – August inclusive but seasonally variable), or if this is not possible, should be preceded by a nesting bird check by a suitably experienced ecologist.
- Enhancements will comprise the inclusion of artificial bat and bird boxes, features for pollinators, and the inclusion of a green roof on all three of the proposed buildings.

1 INTRODUCTION

1.1.1 Clarkson and Woods Ltd. was commissioned by West Hampstead Investments Partnership Ltd. to carry out an Ecological Impact Assessment at 13 Blackburn Road, West Hampstead, London, NW6 1RZ, hereafter referred to as 'the Site'.

1.1.2 This Impact Assessment discusses the likely effects of the proposed development on the ecology of the Site using information collected during an Extended Phase 1 Habitats Survey and Building Inspection carried out by Clarkson and Woods Ltd on 29th April 2020.

1.1.3 The assessment has been prepared by Chris Poole, an assistant ecologist, who is a graduate member of the Chartered Institute of Ecology and Environmental Management (CIEEM). The report has been subject to a two stage quality assurance review by appropriately experienced senior consultants who are full members of CIEEM.

1.1.4 Unless the client indicates to the contrary, information on the presence of species collected during the surveys will be passed to the county biological records centre in order to augment their records for the area. This is in line with the CIEEM code of professional conduct[1].

1.1.5 If no action or development of the Site takes place within twelve months of the date of this report, then the findings of the assessment and supporting surveys should be reviewed. An update of the surveys and/or assessment may be required.

1.2 Report Aims

1.2.1 The aims of this report are:

- To establish, as far as possible, the baseline ecological conditions existing on Site at the time of survey and to identify any likely future changes in the baseline conditions up to the point of commencement.
- To determine likely significant effects resulting from the proposals upon the ecological features identified within the assessment.
- To assess whether the proposals are likely to be in accordance with relevant nature conservation legislation and planning policies.
- To identify where further surveys to establish baseline conditions, inform assessment or develop mitigation or compensatory measures are required.
- To identify how mitigation or compensation measures will be secured, maintained and monitored.
- To identify ecological enhancements to be carried out and how they will be implemented, maintained and monitored.

1.3 Site Description Summary

1.3.1 The Site was located in the area of West Hampstead, within the borough of Camden, in London. The Site itself comprised an apartment block (known as the Clockwork Factory Apartments), with associated access, parking facilities, and utility areas, including a bin storage area and a warehouse/storage building. The local landscape is urban, and is flanked by railway lines to the north and south, which are associated with the nearby West Hampstead Thameslink, overground and underground stations.

1.3.2 The approximate centre of the Site was at Ordnance Survey Grid Reference TQ 25619 84722, and the location of the site is shown in Figure 1 below.

1.3.3 The development Site is approximately 0.27 hectares (ha) in size. An aerial photo of the Site and surrounding area is provided in Figure 2.

[1] Code of Professional Conduct. CIEEM, January 2019.

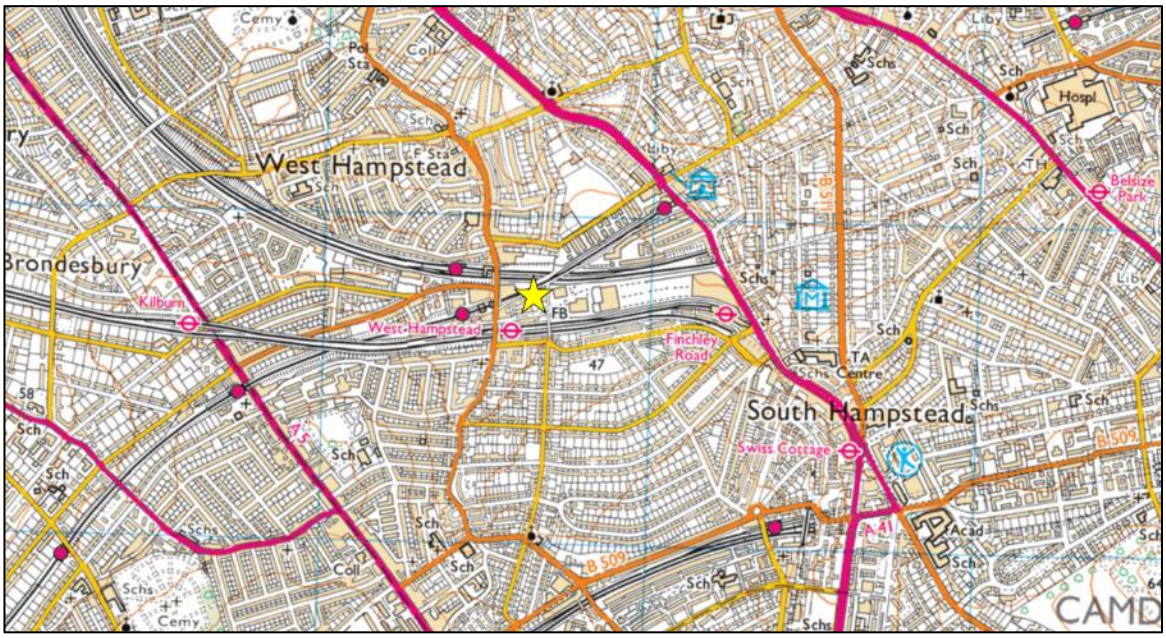

Figure 1: Ordnance Survey Map Showing Location of Site (©2020 Bing Maps)

Figure 2: Aerial photograph of Site boundary (©2020 Google)

1.4 Development Proposals

1.4.1 The proposed works comprise the following:

1.4.2 *Demolition of existing building and construction of three buildings and connecting pavilion standing between 1 and 9 storeys (plus basement) in height, comprising 53 dwellings, 4,802sqm of commercial floorspace, new public square, public realm improvements, landscaping and resident's facilities including cycle, refuse and parking facilities.*

1.4.3 Any changes to the building design and layout and landscaping made subsequent to publication of this report should be issued to Clarkson and Woods Ltd. for review. Ecological impacts and mitigation opportunities may be affected by any such changes.

1.5 Quality Assurance

1.5.1 All ecologists employed by Clarkson and Woods are members of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow the Institute's Code of Professional Conduct[2] when undertaking ecological work.

1.5.2 The competence of all field surveyors has been assessed by Clarkson and Woods with respect to the CIEEM Competencies for Species Survey (CSS)[3].

1.5.3 This report has been prepared in accordance with the relevant British Standard: *BS42020: 2013 – Biodiversity: Code of Practice for Planning and Development*[4]. It has been prepared by an experienced ecologist who is a member of CIEEM. The report has also been subject to a two stage quality assurance review by appropriately experienced ecologists who are full members of CIEEM.

1.6 Assessment Scope / Consultation

1.6.1 A BREEAM assessment (BREEAM NC (New Construction) 2018 - Office) was also completed for the proposed development.

1.6.2 Given the lack of natural habitats within the Site, several protected species were scoped out of this assessment at an early stage, as the Site was considered to be of negligible suitability for these species. The species groups that were scoped out as they were considered likely to be absent from the Site were: badgers, reptiles, amphibians, otters, water voles, and dormice. Given that the proposed development is considered unlikely to result in significant impacts upon these species, they are not considered further within this assessment. The species considered most likely to be utilising the Site were roosting bats and nesting birds, and therefore this impact assessment focuses on these species groups.

[2] CIEEM (2013). *Code of Professional Conduct*. www.cieem.net/professional-conduct.
[3] CIEEM (2013). *Competencies for Species Survey (CSS)*. www.cieem.net/competencies-for-species-survey-css-
[4] The British Standards Institution (2013*). BS42020: 2013 – Biodiversity: Code of Practice for Planning and Development*. BSI Standards Ltd.

2 BASELINE CONDITIONS

2.1 Introduction

2.1.1 This section sets out the results of the Desk Study and ecological field surveys along with an evaluation of their relative importance in order to inform the Impact Assessment. The methodologies associated with the baseline assessment are summarised with each ecological feature's subheading below.

2.1.2 Details of the legislative protection afforded to those protected species which have been identified as occurring or potentially occurring on the Site are given in Appendix A. Species of Conservation Concern are defined as those appearing in any of the following; Priority Habitats and Species under Section 41 of the Natural Environment and Rural Communities Act (2006); red or amber-listed birds within the British Trust for Ornithology's Birds of Conservation Concern (2015); and any specific local conservation priority species such as those listed in Red Data Books.

2.2 Evaluation Methodology

2.2.1 Each recorded ecological feature, whether it is a species, a habitat or a site designated for nature conservation, is described in turn in this section to provide the pre-development baseline conditions on Site. Subsequently, an evaluation of each feature's 'ecological importance' is made. The evaluation of ecological importance is informed by the criteria provided within the CIEEM Guidelines for Ecological Impact Assessment (2018)[5].

2.2.2 With due consideration to the criteria, each feature is classified on a geographical scale of ascending importance as follows; Negligible, Site, Local, District, County, National and International. The chosen geographic level of importance is considered that which best represents the scale at which the loss of the Site's area or population of the feature would have the greatest impact. Where sufficient survey information not available to determine the importance of a species or habitat present on the Site, the importance of the receptor is marked as 'uncertain' and based upon the professional judgement of the author together with available relevant desk study information.

2.2.3 Once importance has been determined for each feature, those of Local importance or above will be considered to be Important Ecological Features (IEFs). Non-IEFs will typically not be considered further within the impact assessment. However, where a feature does not qualify as an IEF but is afforded specific legal protection or coverage under a particular legislation or planning policy it will also be assessed in order to ensure the scheme's legal and policy compliance.

2.3 Desk Study

Methodology

2.3.1 Statutory designated sites for nature conservation were identified using the Natural England/DEFRA web-based MAGIC map database (www.MAGIC.gov.uk). International-level sites such as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) within 5km from the Site were searched for. National-level sites such as National Nature Reserves (NNRs) and Sites of Special Scientific Interest (SSSIs) and Local-level sites such as Local Nature Reserves (LNRs) within 2km of the Site were searched for.

2.3.2 The Greenspace Information for Greater London CIC Environmental Records Centre (GiGL) was consulted for records of protected species and species of conservation concern within 1km of the Site. GiGL was also asked to provide details of locally-designated and non-statutory sites for nature conservation within 1km of the Site.

2.3.3 Clarkson and Woods' own database of ecological records derived from past survey work was also consulted for further locally-relevant data.

2.3.4 The Natural England/DEFRA web-based MAGIC map database was also consulted for records of European Protected Species (EPS) licences issued for mitigation projects concerning EPS within 1km of the Site.

[5] *CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine.* Chartered Institute of Ecology and Environmental Management. www.cieem.net

Unfortunately such data is only available for licence applications made between 2012 and 2015. Recent licence applications do not currently appear.

2.3.5 The Camden Local Plan (adopted July 2017) and Camden Planning Guidance: Biodiversity (March 2018) were consulted for details of planning policies relevant to designated sites, protected species and habitats, and general ecological and environmental protection.

2.3.6 Although no longer valid, the Camden Local Biodiversity Action Plan (BAP) (2013-2018) was consulted for information on conservation priority species and habitats which may require further consideration and weight within Ecological Impact Assessments.

2.3.7 Ordnance Survey maps (1:25,000) and aerial images of the Site were examined online (bing.com/maps and maps.google.co.uk) to allow a better understanding of the context of the Site and its connections to potentially important habitats, known species records and protected sites.

2.3.8 The data presented within this report constitutes a summary of the data obtained from the local records centre. Should additional detail be required on any of the records described within this report Clarkson and Woods Ltd. should be contacted.

Limitations

2.3.9 No specific limitations to the desk study were encountered.

2.3.10 The data presented within this report constitutes a summary of the data obtained from the local records centre. Should additional detail be required on any of the records described within this report Clarkson and Woods Ltd. should be contacted.

2.3.11 It should be noted that the data obtained from within the search area will not constitute a complete record of habitats and species present within the search area. It is therefore possible that protected species may occur within the vicinity of the proposed development site that have not been identified within the desk study.

Desk Study Findings

Designated Sites

Statutory Designated Sites

2.3.12 Three statutory designated sites for nature conservation were identified within the desk study and are summarised in Table 1 below.

Table 1: Summary of Statutory Designated Sites for Nature Conservation

Site Name	Size, Distance and Direction from Site	Reason for Designation	Importance
Belsize Wood Local Nature Reserve (LNR)	0.27ha, 1.93km to the north-east of the Site.	Belsize Wood supports a broad diversity of insect species, likely due to the high floral diversity within the nature reserve. The LNR also contains a pond, a bird feeding area, large insect houses, stag beetle loggeries, bird boxes and other biodiversity enhancing features.	Local
Westbere Copse LNR	0.39ha, 1.27km to the north-west of the Site.	This LNR contains spring and summer meadows, a pond, and a field lab. Approximately 25 species of birds have been recorded, as well as 150 species of plants. Frogs, toads and newts are also known to be present.	Local
Adelaide LNR	0.28ha, 1.99km to the south-east of the Site.	This LNR supports a summer meadow, a pond, and areas of scrub and woodland.	Local

Local and Non-statutory Designated Sites

2.3.13 Ten local or non-statutory designated sites for nature conservation were identified within the desk study and are summarised in Table 2 below. These were all Sites of Importance for Nature Conservation (SINCs), which are recognised by the Greater London Authority and London borough councils as important wildlife sites.

Table 2: Summary of Local and Non-statutory Designated Sites for Nature Conservation

Site Name	Size, Distance and Direction from Site	Description	Importance
Hampstead Cemetery SNCI	9.34ha, 1.2km to the north-west.	Cemetery within Camden with woodland and a wildlife area	Local
West Hampstead Railsides, Medley Orchard and Westbere Copse SNCI	7.58ha, 700m to the west.	These wooded railsides include two nature reserves and an old orchard.	Local
Hampstead Parish Churchyard SNCI	0.91ha, 1.09km to the north-east.	Churchyard with mature trees.	Local
Broadhurst Gardens Meadow SNCI	0.73ha, 310m to the south-east.	The communal grounds of houses in Broadhurst Gardens, with a good quality meadow grassland.	Local
Frognal Court Wood SNCI	0.2ha, 650m to the east.	Small dense secondary woodland.	Local
Green Triangle SNCI	0.29ha, 750m to the south-east,	Community garden surrounded by housing.	Local
Gondar Gardens Covered Reservoir SNCI	1.11ha, 975m to the north-west.	Covered reservoir with grassland that supports a range of wildlife. This site is the only known location in Camden for slow-worms.	Local
160 Mill Lane Community Garden SNCI	0.03ha, 480m to the north-west.	Small community garden with trees, shrubs, and a pond.	Local
Frognal Lane Gardens SNCI	0.55ha, 630m to the north-east.	Small communal garden with trees and a pond.	Local
Kilburn Grange Park SNCI	3.06ha, 700m to the south-west.	Park with a good range of native trees and shrubs, and a small wildlife area.	Local

<u>Planning Policy</u>

2.3.14 The following planning policies are listed in the Camden Local Plan (2017) and are considered of potential relevance to the Site.

Policy A3: Biodiversity

2.3.15 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.

Enhancing Nature Conservation Value

2.3.16 In many developments, it should be feasible to incorporate biodiversity enhancing measures. These can deliver a wide range of environmental and social benefits. This includes retrofits of existing buildings, subject to impacts on heritage assets and amenity. Potential responses including biodiverse-rich landscaping, sustainable urban drainage systems, 'species features' such as bird and bat boxes, artificial roosts for bats, tree planting and green roofs and walls. The Council will negotiate the provision of biodiverse living roofs in all suitable developments. Front gardens also provide an opportunity to provide soft landscaping (planting) which can improve biodiversity as well as enhancing the character and attractiveness of the area.

Trees and Vegetation

2.3.17 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.

2.4 Habitat Survey

Habitat Survey Methodology

2.4.1 A habitat survey was carried out based on standard field methodology set out in the *Handbook for Phase 1 Habitat Survey* (2010 edition)[6]. The survey was completed by Chris Poole MSc GradCIEEM. Chris has 2 years' experience undertaking ecological surveys and holds a BSc and MSc in relevant subjects.

[6] Nature Conservancy Council. (1990 - 2010 edition). *Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit*, Joint Nature Conservation Committee

2.4.2 Botanical names follow Stace (1997)[7] for higher plants and Edwards (1999)[8] for bryophytes.

2.4.3 The results of the Phase 1 Habitats Survey are included in map form on Figure 3. Habitats are mapped following the codes and conventions described within the Phase 1 Habitat Survey Handbook and Target Notes (Table 3) are used to describe habitats not readily conforming to recognised types and evidence of, or potential for, protected species and species of conservation concern. Photographs of the Site are provided in Appendix C at the end of this report.

Buildings

2.4.4 The majority of the Site comprised two buildings. These were a residential building known as the Clockwork Factory Apartments (Building 1), and a warehouse building (Building 2) to the north of Building 1. These two buildings were connected via the 1st floor of Building 1. Descriptions of these buildings are provided below, and assessments of their suitability to support protected species are provided in Section 2.5 below.

Building 1

2.4.5 Building 1 was a residential building of brick and blockwork construction, with a series of flat rooves at varying levels. The building was 3-storeys in height, and also featured a basement level. The flat rooves were covered with a Bituminous felt, with no tiling present. Small areas of mosses had developed in the corners of the flat roofs, and no other vegetation was present on the roof of this building.

2.4.6 The majority of the exterior of Building 1 featured aluminium panel cladding. The panelling was in good condition throughout. The interior of the building was modern and well-sealed, and comprised residential flats and communal areas.

2.4.7 The basement level comprised a utility room containing electrical meters, an archiving/storage room, and a boiler/plant room. These rooms were in good condition and were well-sealed throughout. Ground-floor level windows were present in the rooms on the basement level, however these were all sealed up and barred internally, providing no access in to the interior of the building.

Building 2

2.4.8 Building 2 was a warehouse to the north of Building 1 which was used to store materials and archived documents. The building was single-storey, and was of a brick construction with corrugated metal sheet cladding, and a single pitched, relatively flat roof. Similarly to the rooves of Building 1, the roof was covered with a Bituminous felt, with no tiling present. The roof was almost entirely devoid of any vegetation.

2.4.9 The interior of this building could not be accessed at the time of the survey, however the exterior of the building was in good condition and was well-sealed. It is understood from the building caretaker that the interior of the building was in a similar condition, providing no access for wildlife (such as bats or birds) in to the interior of the building.

Hardstanding

Field Survey Results

2.4.10 There was a hardstanding car park around the perimeter of Building 1, which also ran underneath a section of the 1st floor of Building 1. The hardstanding featured some areas of ephemeral vegetation characteristic of bare ground habitats, with species recorded including butterfly bush Buddleja sp., shepherds purse *Capsella bursa-pastoris*, dandelion *Taraxacum agg.*, common nettle *Urtica dioica*, petty spurge *Euphorbia peplus* and prickly lettuce *Lactuca serriola*.

Evaluation

2.4.11 The hardstanding was of very low ecological value, and was therefore considered to be of Site level importance.

[7] Stace, C. (1997). *New Flora of the British Isles Second Edition*. Cambridge University Press
[8] Edwards, S.R. (1999). *English Names for British Bryophytes*. BBS, Cardiff

Non-Native Ornamental Trees

Field Survey Results

2.4.12 Three non-native ornamental trees were present along the southern boundary of the Site (bordering Blackburn Road). These trees were approximately 2.5m in height.

Evaluation

2.4.13 The non-native ornamental trees were considered to be of Site level importance.

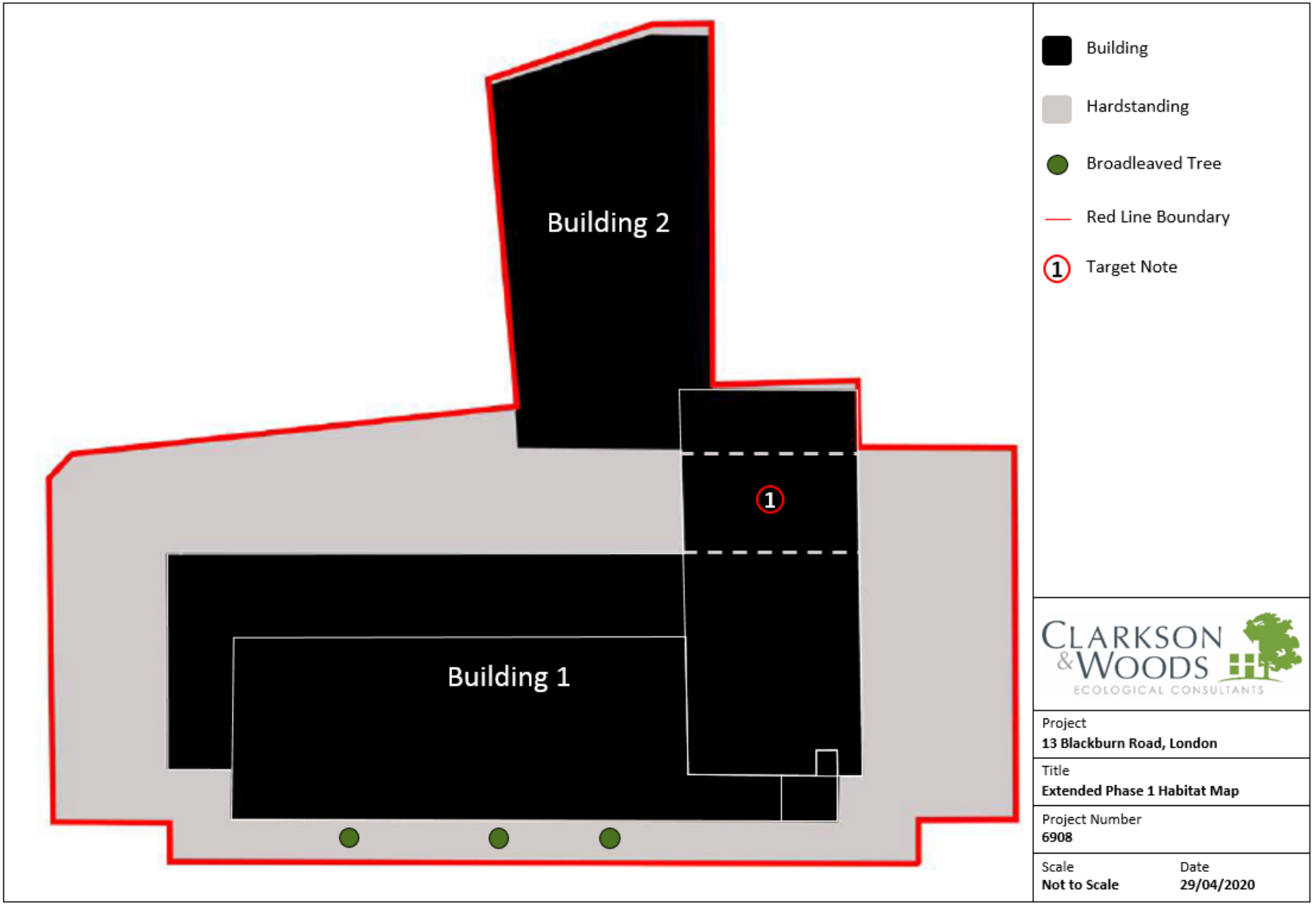

Figure 3: Extended Phase 1 Habitat Map

Table 3: Target Notes

No.	Description
TN1	Undercroft beneath 1st floor section of Building 1.

2.5 Protected Species Survey and Species of Conservation Concern

Bats

2.5.1 The assessment of the suitability of the site for foraging and roosting bats was based on current guidance set out by the Bat Conservation Trust[9].

2.5.2 *Buildings:* the exteriors of the buildings were examined through the use of ladders, torches and binoculars for potential roosting features (PRFs). Wherever possible, these points were thoroughly investigated using ladders and a video fibrescope to determine the likelihood of their occupation and evidence of presence. Extra factors taken into consideration included the potential for noise disturbance to the potential roost feature, exposure to the elements, lighting levels, proximity/connectivity of vegetation and water and whether these PRFs led on to cavities further into the structure.

2.5.3 Internally, all accessible roof voids and accessible parts of the building were entered where safe and possible to do so in order to describe their characteristics and to look for PRFs. A 1 million candle-power torch, ladders and a video fibrescope were used where necessary. Any signs of occupation including urine staining, prey remains, fur rubbing marks and droppings were noted where found.

2.5.4 Following the inspections, each building was assigned a 'high', 'medium', 'low' or 'negligible' category as a guide to inform any necessary further survey effort as stipulated in the Bat Surveys Good Practice Guidelines (Bat Conservation Trust, 2016).

2.5.5 *Trees:* an inspection of trees on site was carried out from the ground, using binoculars, to record any signs of use of the tree by bat species. A ladder, powerful torch and a video fibrescope were available. Features such as frost cracks, rot cavities, flush cuts, split or decaying limbs (including hazard beams), loose bark and dense plates of ivy were inspected and recorded. Any signs of staining (from urine or fur rubbing) and scratch marks below potential access points were noted, and a search was made for droppings underneath these features.

2.5.6 *Habitat:* the habitats within the site were appraised for their suitability for use by foraging and commuting bats. In particular, the connectivity of the habitats on site to those lying beyond was taken into account. Vegetated linear features are typically important for many species to navigate around the landscape, while the presence of woodland, scrub, gardens, grassland and wetland features increases a site's foraging resource value to bats. The potential for noise or lighting disturbance which may affect commuting links was also recorded.

Limitations

2.5.7 Bats are very small creatures, capable of secreting themselves away into extremely small spaces and it is possible that these animals, or their signs, might have been missed during the survey if they are normally present opportunistically or in small numbers for a short period of time each year.

2.5.8 The interior of Building 2 (the warehouse building to the north of the Clockwork Factory Apartments) was not accessible during the survey. However, the exterior of the building was modern and well-sealed, and therefore it is considered unlikely that bats or their signs were present within the interior of the building, and therefore this was not considered a significant constraint in the context of this ecological impact assessment.

Desk Study Information

2.5.9 The data search from GiGL returned records of the following bat species within 1km of the Site since 2010: common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, Nathusius's pipistrelle *Pipistrellus nathusii*, serotine *Eptesicus serotinus*, noctule *Nyctalus noctula*, Leisler's bat *Nyctalus leisleri*, and

[9] Collins, J. (ed) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London. ISBN-13 978-1-872745-96-1.

unidentified *Myotis sp.* bats. The closest of these records pertained to common pipistrelle, which was located approximately 470m from the Site.

Field Survey Results

Habitat

2.5.10 Given that the Site contained almost no natural habitats (with the exception of three ornamental trees on the southern boundary of the Site), the Site was considered to be of negligible value for foraging/commuting bats.

Buildings

2.5.11 The metal cladding on Building 1 provided small crevices behind the panels, which may be utilised by roosting bats. Similar features have been found to support significant pipistrelle bat roosts (primarily soprano pipistrelles) in urban environments within Britain and in continental Europe. As a result, Building 1 was considered to be of 'low' suitability for roosting bats, in accordance with BCT guidelines.

2.5.12 Building 2 was well-sealed and did not contain any potential roosting features, and was therefore considered to be of 'negligible' suitability for roosting bats, in accordance with BCT guidelines.

Trees

2.5.13 The three ornamental trees were of an age and structure which provided no potential roosting features for bats, and therefore we considered to be of negligible suitability for roosting bats.

Evaluation

2.5.14 Although no evidence of roosting bats was recorded during the survey, Building 1 still remains of low suitability for roosting bats. Although it is considered highly unlikely, if bats were present, the Site would be considered to be a maximum of Site/Local value for roosting bats.

Birds

Methodology

2.5.15 Any buildings and vegetation were surveyed for signs of use by nesting birds and any birds seen or heard during the survey were noted. The site's potential to support bird species of particular conservation concern (i.e. Schedule 1, NERC S41 and Red List species) was assessed, taking into consideration the bird species assemblage observed during the survey, the habitats present on and around the site, the context of the site in the wider landscape and the results of the desk study.

Desk Study Information

2.5.16 The data search returned several records of bird species within 1km of the Site since 2010. These included BTO red listed species of conservation concern, such as lesser spotted woodpecker *Dendrocopos minor*, yellowhammer *Emberiza citrinella,* herring gull *Larus argentatus*, grey wagtail *Motacilla cinerea*, house sparrow *Passer domesticus*, starling *Sturnus vulgaris*, and song thrush *Turdus philomelos*. Several species of local conservation concern have also been recorded in the local area, including: swift *Apus apus*, grey heron *Ardea cinerea*, stock dove *Columba oenas*, rook *Corvus frugilegus*, kestrel *Falco tinnunculus*, dunnock *Prunella modularis*, goldcrest *Regulus regulus* and tawny owl *Strix aluco*.

Field Survey Results

2.5.17 The buildings on Site were considered to be of negligible suitability for nesting birds, and no evidence of nesting birds was recorded in the interior or exterior of the buildings during the survey. The hardstanding surrounding the buildings was also considered to be of negligible suitability for nesting birds.

2.5.18 The three ornamental trees on the southern boundary of the Site were relatively sparse and therefore were unlikely to support nesting birds, however opportunistic nesting within these trees by small bird species such as tits or wrens could not be ruled out.

2.5.19 Bird species recorded on Site during the survey were feral pigeon *Columba livia*, carrion crow *Corvus corone*, blue tit *Cyanistes caeruleus,* ring-necked parakeet *Psittacula krameri*, starling *Sturnus vulgaris*, and pied wagtail *Motacilla alba*.

Evaluation

2.5.20 The ornamental trees provided some (albeit very limited) opportunities for nesting birds and were therefore considered to be of 'Site' value for nesting birds, however the remainder of the Site was considered to be of negligible suitability for nesting birds, and no evidence of nesting birds was recorded during the survey.

Other Protected Species and Species of Conservation Concern

Field Survey Results

2.5.21 Although the small stands of buddleja are of floral interest for invertebrates such as butterflies and bees, the Site is generally considered to be of very limited value for invertebrates, including pollinators.

2.5.22 No invasive species or other species of conservation concern were recorded during the survey.

2.6 Summary of Ecological Importance

2.6.1 Table 4 below gives all the identified ecological features on Site and their individual assessment of importance. Those coloured green are considered to be Important Ecological Features and will form the basis of the Assessment of Effects in Section 3. Those coloured yellow will be included on the basis of their specific legal protection or applicable planning policies.

Table 4: Ecological Importance

Feature	Importance
Designated Sites	
Belsize Wood Local Nature Reserve (LNR)	Local
Westbere Copse LNR	Local
Adelaide LNR	Local
Ten Sites of Nature Conservation Importance (SNCIs) within 1km of the Site.	Local
Habitats	
Buildings	See 'Bats' below.
Hardstanding	Site
Species	
Bats	Likely Negligible/Site
Birds	Site
Invertebrates	Negligible

3 ASSESSMENT OF EFFECTS

3.1 Methodology

3.1.1 Continuing from the valuation of Important Ecological Features (IEFs), this section lists each IEF in turn together with a characterisation of any potential impacts upon them likely to arise from the proposals. This takes into consideration any measures inherent to the designed scheme which seek to avoid such impacts altogether. Next, any agreed mitigation measures chosen to reduce likely impacts are then set out, along with the mechanism(s) through which these would be secured.

3.1.2 Residual effects, being those effects which would likely still arise despite any avoidance measures or agreed mitigation efforts, are subsequently discussed. Residual effects are determined to be either significant or not significant and any significant residual effects are given a geographical scale at which they might be felt. This assessment methodology is in accordance with that set out in the CIEEM Guidelines for Ecological Impact Assessment, 2018.

3.1.3 Where residual effects are identified compensatory measures may be proposed to make up for the loss or permanent damage to an IEF, as far as possible. Monitoring or management schemes which may be necessary to ensure the long-term achievement of all intended mitigation and compensation are discussed.

3.1.4 Ecological enhancement measures that will be incorporated into the development are given in line with the National Planning Policy Framework.

3.2 Summary of Development Proposals

3.2.1 The development proposals include the demolition of all of the buildings within the Site, and the subsequent construction of three new buildings, comprising residential and commercial units. The proposals also include the creation of areas of soft landscaping within the courtyard areas between the buildings, and the creation of a combined blue/green roof system on all three of the proposed buildings.

3.3 Designated Sites

Statutory and Non-Statutory Designated Sites

Potential Impacts

3.3.1 The proposed development is a relatively small-scale development in the context of the urban landscape, and will be situated on land previously occupied by buildings and hardstanding. It is therefore considered unlikely that the proposed development will have any significant impacts, either directly or indirectly, on the statutory or non-statutory designated sites identified during the desk study. As a result, the statutory and non-statutory designated sites are not considered further within this assessment.

3.4 Habitats

Potential Impacts

3.4.1 The proposals will result in the removal of the three ornamental trees along the southern boundary of the Site, as well as the demolition of the existing buildings.

3.4.2 The development will also result in the creation of new areas of landscaping within the courtyard area. This would predominately comprise a variety of street trees and planters, as shown in Figure 4 below.

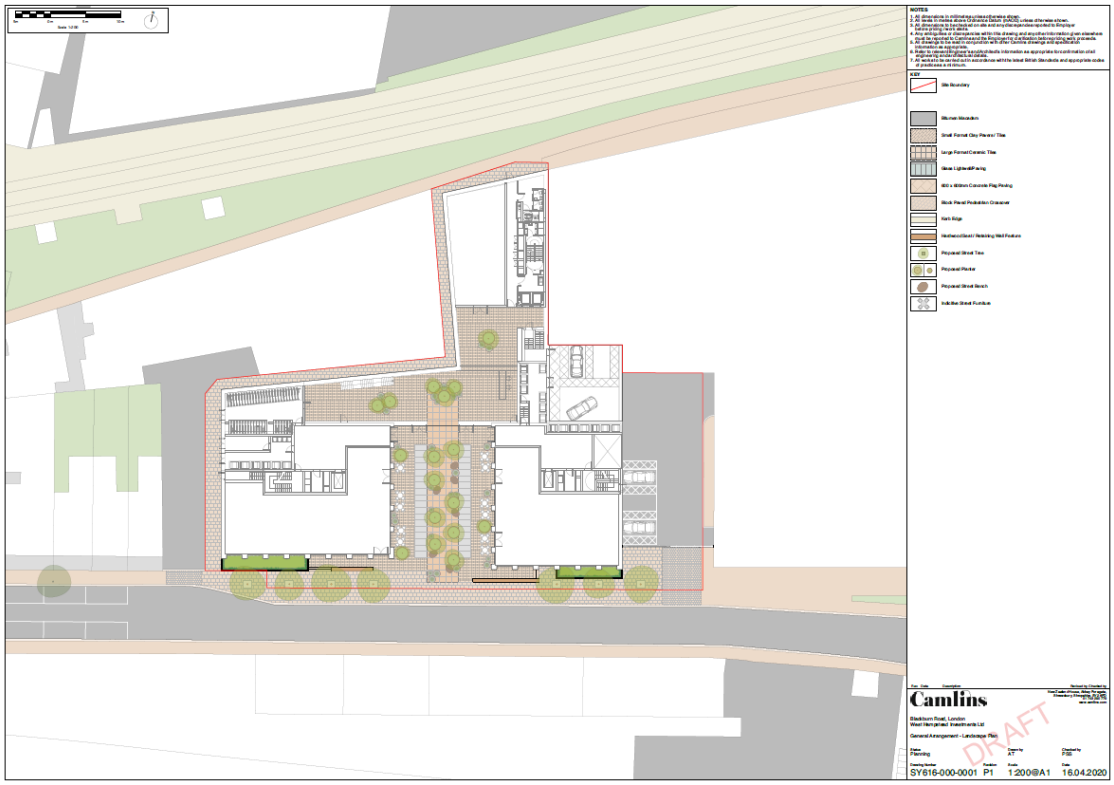

Figure 4: 13 Blackburn Road General Arrangement – Landscape Plan (produced by Camlins, drawing ref: SY616-000-0001, dated 16.04.2020).

Biodiversity Impact Assessment Calculator

3.4.3 The Biodiversity Impact scores calculated for the development (using the BREEAM NC 2018 Change in Ecological Value Calculator) were returned as 0 Habitat Biodiversity Units loss from the demolition of the existing site (due to the lack of any natural habitats and negligible ecological value of the site in its current state), and +2,515 Habitat Biodiversity Units Gain as a result of the proposed development (due to the green roof and soft landscaping). Furthermore, the development will result in the loss of 16 Linear Habitat Units (due to the loss of the line of ornamental trees on the southern boundary of the Site), and a gain of 32 Linear Habitat Units (due to the planting of new street trees along the southern boundary of the Site), thereby resulting in an overall net gain of 16 linear habitat units. This result constitutes a significant net gain for biodiversity within the site as a result of the proposed development.

Bats

3.4.4 Although no evidence was recorded during the survey, Building 1 was considered to be of 'low' suitability for roosting bats. If present, the Site is unlikely to support a roost of higher significance than 'site' level importance.

Potential Impacts

3.4.5 In the unlikely event that bats are present under areas of cladding on Building 1, they may be injured or killed during works to remove the cladding. Given that the building will be entirely demolished, this will also result in the destruction of any roosts present within the building.

3.4.6 Although the BCT guidelines recommend the completion of one dusk emergence survey for buildings of 'low' suitability for roosting bats, the completion of further surveys on the building would not be considered appropriate in this instance. Given that the cladding is present across almost the entirety of the building's vertical surfaces, an emergence survey that provided sufficient coverage of the building would be very difficult to complete, and would likely be ineffective in recording the location of any emerging bats (should they be present). Given this, and the fact that the risk of bats being present on a given night is considered to be very low, the completion of further bat surveys is not recommended, and a precautionary methodology with regards to building demolition will be implemented instead.

3.5 Recommendations for Mitigation and Enhancement

Ecological Mitigation Measures

3.5.1 The removal of the metal cladding on Building 1 should be conducted outside of the months of August – October, in order to minimise the risks of encountering and impacting roosting bats such as pipistrelles. August – October is the period when pipistrelle bats have been found to favour the use of large building roosts for mating purposes. As it is considered unlikely that the building is used by hibernating bats (due to the metal cladding likely not providing thermally stable conditions through the winter months), this work can be conducted through the winter, or in Spring/Summer.

3.5.2 These works should also be preceded by a toolbox talk to contractors, delivered by a qualified and licenced ecologist. Contractors will be given advice so as to remove the cladding in such a way that, should bats be present, they are least likely to be harmed and more likely to be noticed. Contractors would also be briefed on the correct procedure that should be followed, in the event that bats are encountered.

3.5.3 Should a bat be encountered during demolition, work in that area must cease at once, and a European Protected Species Licence will need to be obtained before works can recommence. Construction personnel should not handle the bat (but, if for any reason this is unavoidable, gloves should be worn) and should leave it in-situ, covering the immediate area as necessary to protect it from the elements. Clarkson and Woods should be contacted immediately on 01934 712500 for advice and to ensure that legislation protecting bats and their roosts is not breached.

3.5.4 The removal of the ornamental trees (considered potential nesting bird habitat) should be timed to occur outside the bird nesting season (usually March – August inclusive but seasonally variable). If this is not possible, a suitably experienced ecologist will be required to check the vegetation for active nests first. This check would identify individual nests and life stages of the occupants (eggs, chicks, fledglings). Any active nests found would need to be protected until eggs have hatched and young fledged. This would be ensured through the creation of at least a 5m buffer zone free of any demolition works. Until the young have fledged, the nest should be subjected to regular monitoring to ensure that a second brood is not raised once the first brood has fledged.

3.5.5 Although the Site and the surrounding urban landscape is currently well lit, best practice measures to minimise light pollution of the future development should be adopted in order to prevent the exclusion of light-sensitive species from the Site and immediate surroundings, particularly the vegetation associated with the adjacent railway line. External lighting within the development should adhere to overarching principles in order to minimise the potential impact of artificial lighting on bats in the surrounding area, beyond that which is necessary. These principles include the following:

- Column height will be carefully considered to ensure that minimal light spill is achieved, and will not exceed 4m in height;
- A warm white spectrum (<2700 Kelvin) will be adopted as this will reduce the impacts of blue light upon wildlife;
- LED lamps will be used where possible;
- If/where outside security lighting is required, these should be set on motion-sensors and/or timers to decrease the light pollution impacts. These lights should also be directed away from the installed artificial roosting features for bats (and hooded/cowled where necessary), and be of the lowest intensity/brightness necessary for their purpose;
- Where required, accessories such as baffles, hoods or louvres will be used on the lamps to reduce unnecessary light spill.

Residual Effects

3.5.6 Given that it is considered unlikely that bats or nesting birds are present within the Site, the above mitigation measures have been recommended on a precautionary basis, in order to minimise the risk of an offence being committed under the Wildlife and Countryside Act 1981 (as amended) or the Conservation of Habitats and Species Regulations 2017 (see Appendix A for details of legislative protection), during demolition of the buildings and trees on Site.

3.5.7 Assuming the implementation of the above approach during the demolition works, it is therefore considered unlikely that any residual effects upon ecological features will occur as a result of the proposed development.

Ecological Enhancement Measures

3.5.8 Four permanent bird nesting features will be incorporated in to the design of the proposed buildings, in order to enhance the ecological value of the buildings. Two EcoSurv Swift Boxes, which can be faced to match the building materials of the development, will be installed on the northern elevation of the buildings, suitably located away from windows. This will provide good connectivity to the semi-natural habitats associated with the railway line to the north of the Site. Two Schwegler Type 24 or 25 Brick Nests will also be incorporated into the walls of the buildings in a suitable location. These boxes can also be faced with a suitable material or rendered over depending upon the fabrication of the building where the box is installed. All boxes should be fixed away from light sources or windows, and, in the case of the swift boxes, should be built in as high as possible on the new buildings.

3.5.9 Extensive green rooves are also proposed for all three of the buildings, which will be created on top of areas of blue roof, to form part of a combined blue/green roof system. Figure 5 below shows the areas within which this combined blue/green roof system is proposed (shown in blue). The area of green roof to be installed will total approximately 873.5m^2.

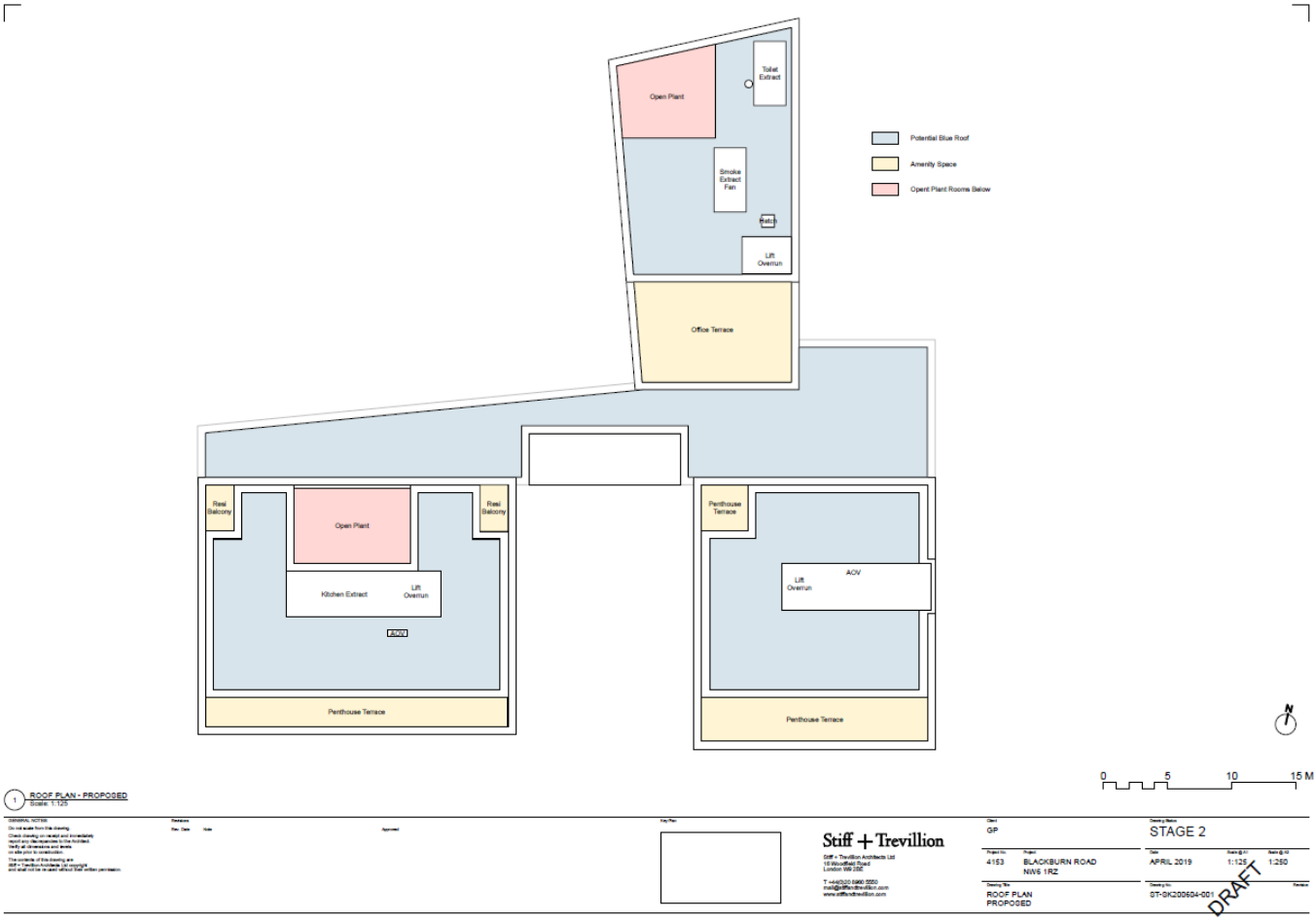

Figure 5: Proposed Roof Plan. Stiff + Trevillion Architects Ltd, April 2019, Drawing No. ST-SK200604-001.

3.5.10 The green roof would consist of a significant substrate of between 100-150mm in depth comprising membranes, earth and other stable growth media seeded with a mix of seeds specifically selected for the varied and adverse conditions found at roof level, together with organic adhesives, fertiliser and mycorrhizal fungi. A specific seed mix such as Bauder Flora 5 will be sewn, as it comprises a mixture of species chosen specifically for exposed and dry rooftop conditions in inner city locations. The Bauder Flora 5 mix contains 38 native species of British Provenance, including 28 wildflowers, 6 annuals, 2 sedges and grasses, and 2 sedum

species. The mix provides a nectar- and pollen-rich habitat for priority pollinators, larval food plants for butterflies, and valuable foraging habitat for birds and bats.

3.5.11 The inclusion of a biodiverse roof will enable compliance with the relevant BREEAM Land Use and Ecology criteria to be maximised, as well as demonstrating compliance with the Camden Local Plan.

3.5.12 These green rooves and other features will provide valuable habitats for birds and bats, but also invertebrates such as pollinators. The site lies along the 'London B-Lines' project route, which is a project to create and connect valuable habitat for pollinators in a band running north-south through the city of London. The development will therefore also incorporate two bee/bug hotels within the green roof areas, in order to contribute to the London B-Lines project.

3.5.13 A Landscape and Environmental Management Plan (LEMP) will be prepared for the operational site following the receipt of planning permission. This document will cover how newly planted areas such as the green rooves and soft landscaped areas should be managed so as to maximise their biodiversity value and achieve the objectives of ecological mitigation and compensation. The LEMP should also set out any measures necessary to ensure protected species are appropriately accommodated within the operational site.

3.5.14 Good horticultural practices will be used when managing any vegetation on Site. This would include the use of peat-free composts, mulches and soil conditioner, and avoiding the use of herbicides, pesticides and fertilisers within landscape planting areas. In the event that the use of pesticides is unavoidable, those used should be non-residual.

4 CONCLUSIONS

4.1.1 The Site is considered to be of Site value for roosting bats and nesting birds, and of Negligible value for all other assessed ecological receptors. Therefore, the proposed development is not anticipated to adversely impact any ecological receptors, with the potential exception of roosting bats and nesting birds.

4.1.2 Avoidance and mitigation measures have been proposed to ensure that these impacts are reduced as far as possible. These measures include seasonal timing of demolition works in order to minimise the likelihood of impacting these species, as well as the delivery of a toolbox talk to site staff to make them aware of the risks associated with the demolition works. Best practice measures relating to external lighting have also been recommended in order to reduce the impacts of artificial lighting as a result of the proposed development. The development will also deliver several ecological enhancements, including green rooves, the installation of bat and bird boxes, and features for pollinators to ensure that the site contributes positively to the London B-Lines project.

4.1.3 Assuming the successful implementation of the measures described above, the proposed development can be considered in line with planning policy A3 of the Camden Local Plan.

APPENDIX A: WILDLIFE LEGISLATION & SPECIES INFORMATION

BATS

All 17 species of bat known to breed in England and Wales, and their roost sites, are protected under the Conservation of Habitats and Species Regulations 2017, known as the 'Habitats Regulations'. This makes it an offence to deliberately kill or injure a bat, or to deliberately disturb a bat such that its ability to hibernate, breed or rear young, or such that the species' distribution, were significantly affected. It is also an offence to damage or destroy any breeding site or resting place. Intentional or reckless disturbance of bats in their resting places, and damage to or obstruction of resting places are also offences under the Wildlife and Countryside Act 1981 (as amended). Under UK law a bat roost is "any structure or place which any wild [bat]...uses for shelter or protection". As bats tend to reuse the same roosts, legal opinion is that the roost is protected whether or not the bats are present at the time. Penalties for offences against bats or their roosts include fines of up to £5,000 and/or up to six months in prison.

As a result, development works which are likely to involve the loss of or alteration to roost sites, or which could result in killing of or injury to bats, need to take place under licence. Works which could disturb bats may also be licensable, though this needs to be assessed on a case by case basis, as bats' sensitivity to disturbance varies depending on normal background levels, and the definition of disturbance offences under the Habitats Regulations is complex. In practice this means that works involving modification or loss of roosts (typically in buildings, trees or underground sites) or significant disturbance to bats in roosts are likely to be licensable.

Licences can be obtained from Natural England or the Welsh Government to permit works that would otherwise be illegal, provided it can be demonstrated that the proposed works are needed to protect public health or safety, or for other reasons of overriding public interest including social and economic reasons. It is also necessary to demonstrate that there is no satisfactory alternative to the proposed works, and that the conservation status of bats in the area will be maintained. Appropriate mitigation and post-construction monitoring are therefore a requirement of all licences.

BIRDS

All British birds, their nests and eggs (with certain exceptions) are protected under the Wildlife & Countryside Act 1981 (as amended) which makes it an offence to: intentionally kill, injure or take a wild bird; intentionally take, damage or destroy nests which are in use or being built; intentionally take or destroy birds' eggs; or possess live or dead wild birds or eggs. A number of species receive additional protection through inclusion on Schedule 1 of the Wildlife and Countryside Act; for these it is also an offence to intentionally or recklessly disturb birds while nest building, or at a nest containing eggs or young, or to disturb the dependant young of such a bird. Penalties for offences against bird species include fines of up to £5,000 and/or up to six months in prison.

General licences for control of some bird species are issued by Natural England and Natural Resources Wales in order to prevent damage or disease, or to preserve public health or public safety, but it is not possible to obtain a licence for control of birds or removal of eggs/nests for development purposes. Consequently if nesting birds are present on a development site when works are programmed to start it is usually necessary to delay works, at least in the areas supporting nests, until any chicks have fledged and left the nest. It is usually possible, once chicks have hatched, for an experienced ecologist to predict approximately when they are likely to fledge, in order to inform programming of works on site.

PLANNING POLICY IN RELATION TO BIODIVERSITY - ENGLAND

The National Planning Policy Framework (NPPF), was published in March 2012 and revised in July 2018. Additional guidance can be found online at http://planningguidance.planningportal.gov.uk/blog/guidance/. The NPPF simplifies and collates a number of previous planning documents and outlines the government's objective towards biodiversity.

The NPPF identifies ways in which the planning system should contribute to and enhance the natural and local environment (Paragraph 170), including:

- (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- (e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- (f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. protecting and enhancing valued landscapes, geological conservation interests and soils;

It also emphasises the importance of conserving biodiversity and areas covered by landscape designations (Paragraph 172):

Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

When determining planning applications, the NPPF states that local planning authorities should aim to conserve and enhance biodiversity (Paragraph 175) by applying principles including:

- (a) if significant harm to biodiversity 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;
- (b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- (c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons[6] and a suitable compensation strategy exists; and
- (d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

The following should be given the same protection as habitats sites:

- (a) potential Special Protection Areas and possible Special Areas of Conservation;
- (b) listed or proposed Ramsar sites7; and
- (c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

There is a general presumption in favour of sustainable development within the NPPF. It is noted in Paragraph 177 that this presumption does not apply where the plan or project is likely to have a significant effect on a habitat site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

The Natural Environment and Rural Communities Act (2006) states that a public authority must, "in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity; Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat". DEFRA issued further guidance on implementation of this act in the document; Guidance for Local Authorities on Implementing the Biodiversity Duty (May 2007), which notes that "Conserving biodiversity includes restoring and enhancing species populations and habitats, as well as protecting them".

ECOLOGICAL ENHANCEMENTS

The Natural Environment and Rural Communities Act (2006) states that a public authority must, "in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity; Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat". DEFRA issued further guidance on implementation of this act in the document; Guidance for Local Authorities on Implementing the Biodiversity Duty (May 2007), which notes that "Conserving biodiversity can include restoring or enhancing a population or habitat"".

In England, the National Planning Policy Framework (NPPF), issued in July 2018, states that the planning system should contribute to "*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*. It also states that "*opportunities to incorporate biodiversity in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity*".

UK BIODIVERSITY ACTION PLANS

The UK Biodiversity Action Plan (UK BAP) 2011 is a policy first published in 1994 to protect biodiversity and stems from the 1992 Rio Biodiversity Earth Summit. The policy is continuously revised to combine new and existing conservation initiatives to conserve and enhance species and habitats, promote public awareness and contribute to international conservation efforts. Each plan details the status, threats and unique conservation strategies for the species or habitat concerned, to encourage spread and promote population numbers.

Species or habitats identified as priorities under the UK Biodiversity Action Plan receive some status in the planning process through their identification as Species/Habitats of Principal Importance in England and Wales, under the Natural Environment and Rural Communities (NERC) Act 2006 (as amended).

Current planning guidance in England, the National Planning Policy Framework, does not specifically refer to Species or Habitats of Principal Importance, though it includes guidance for conservation of biodiversity in general. Supplementary guidance is available

online at http://planningguidance.planningportal.gov.uk/blog/guidance/ and this guidance indicates that it is '*useful to consider*' the potential effects of a development on the habitats or species on the Natural Environment and Rural Communities Act 2006 section 41 list.

APPENDIX B: PHOTOGRAPHS OF SITE FEATURES

Photograph 1: Eastern elevation of Building 1.

Photograph 2: Roof Sections of Building 1.

Photograph 3: Exterior of Building 2 (Warehouse).

Photograph 4: Undercroft under Building 1.

Photograph 5: Roof of Building 2 (left0.

Photograph 6: Roof of Building 1.

Photograph 7: Example of cladding on Building 1, showing small gaps between and underneath panels.

Photograph 8: Southern elevation of Building 1, showing ornamental trees.

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