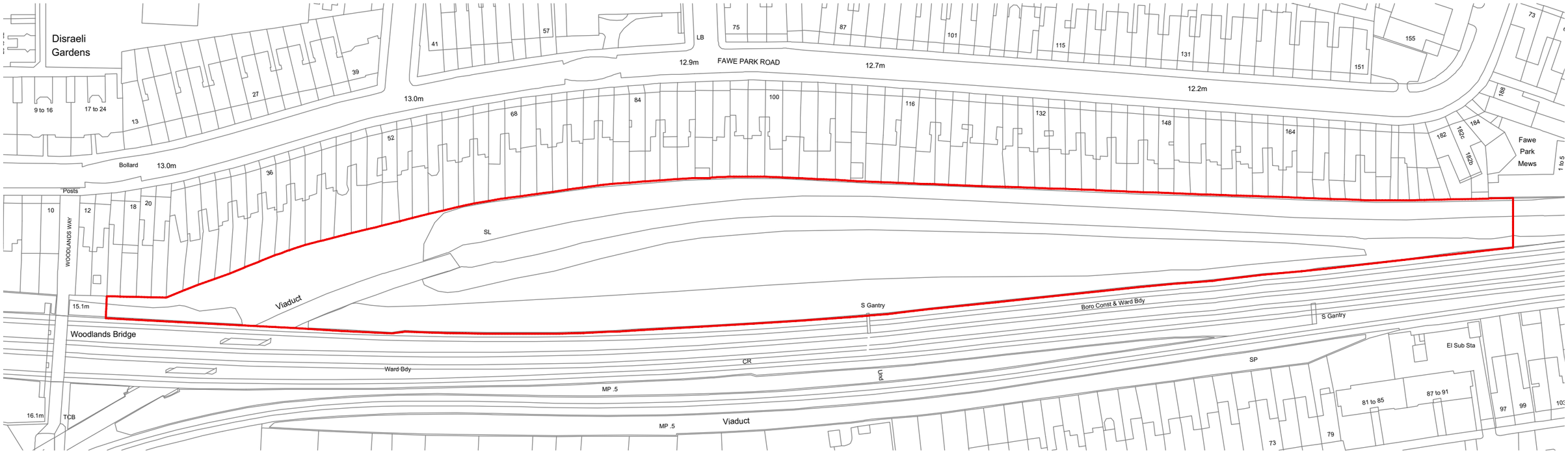


Specific Notes:

N

1:1250

0 10 20 30 40 50 60m

Key:

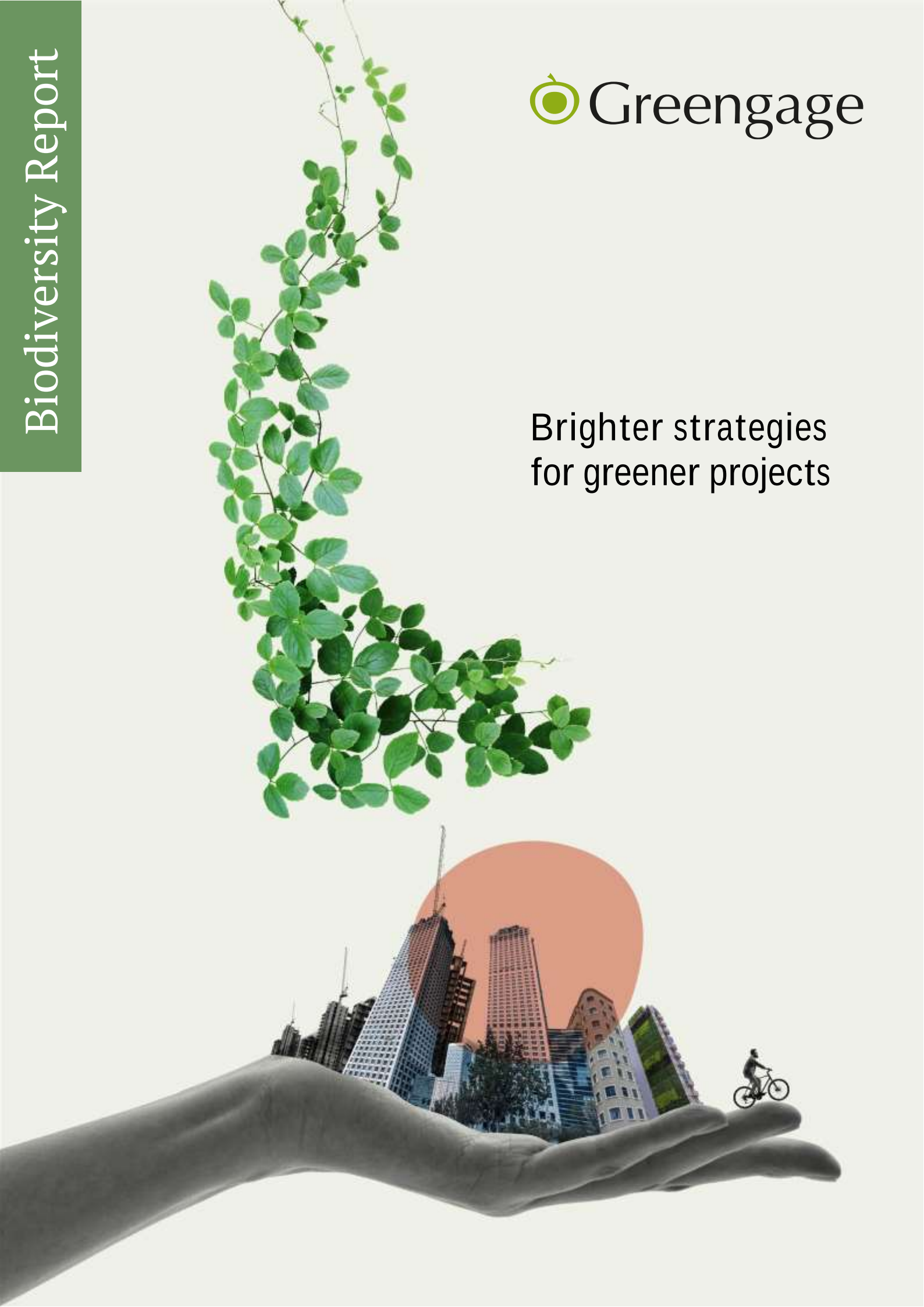
Application site boundary

Project	**Fawe Park Road** Putney London SW15 2EG/2EA
Drawing Title	**Site Location Plan**
Drawing No.	1915-DS-00-GF-DR-A-D001
Revision	**P0**

Biodiversity Report

Greengage

Brighter strategies
for greener projects



Client: Northport FPR Ltd

Project: Fawe Park Road

Report: Biodiversity Impact Assessment

QUALITY ASSURANCE

Issue/Revision:	Draft	Final
Date:	January 2022	January 2022
Comments:		
Prepared by:	Jess Cole	Jess Cole
Authorised by:	Mitch Cooke	Mitch Cooke
File Reference:	551734jc13Jan22DV01_BIA	551734jc13Jan22FV01_BIA

CONTENTS

Tables

Figures

No table of figures entries found.

1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd was commissioned to undertake a Biodiversity Impact Assessment (BIA) by Northport FPR Ltd of a site known as Fawe Park Road, within the London Borough of Wandsworth.

This document has been produced to support a submission to designate the site for housing as part of the Wandsworth local plan. The indicative designation would be to construct 78 residential units, ranging from 3 to 4 storey in height, also comprising landscaped areas, a new road with two turning points and off-street parking for the properties. The proposal is also for the demolition of two terraced properties in Fawe Park Road to create vehicle and pedestrian access to site.

The assessment aimed to quantify the predicted change in ecological value of the site in light of the proposed development to assess compliance against local and national planning policy.

The survey area extends to approximately 1.5 hectares (ha) and comprises regenerative broad leaved woodland, dense scrub, buildings and scattered trees. The Putney Embankment Site of Importance for Nature Conservation (SINC) extends through the site and along the railway corridor to Putney Railway Station.

The baseline ecological value of the site is 8.39 area-based biodiversity units. Under the current development proposals, the development stands to result in a post-development area-based value of 5.77, equivalent to a 31.30% net loss.

It should be noted that these figures are preliminary only and this assessment should be re-calculated once finalised landscaping is available.

Additional enhancement recommendations are made within the Preliminary Ecological Appraisal (PEA) report (Doc ref: 551734sb16sep21FV04_PEA), such as provision of bird and bat boxes and invertebrate habitat features. These features will contribute to the enhancement of the qualitative biodiversity value of the site however they do not change the quantitative result described above.

Currently, the proposals do not stand to be meet the requirements in the national policy (NPPF) which requires a net gain in biodiversity value post-development. The emerging Environment Bill requires local authorities to identify opportunities for habitat creation and/or enhancement elsewhere within the Borough, where developments cannot provide the net gain on site.

As such discussions with the LPA, the London Borough of Wandsworth, on offsite provision to offset the loss of biodiversity units will be undertaken and the mechanism for how this will be delivered.

Detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and management onsite will be provided within an Ecological Management Plan (EMP) for the site which could be secured through planning condition. Should these recommendations be adhered to, the proposals stand to be compliant with legislation and current planning policy.

2.0 INTRODUCTION

Greengage Environmental Ltd was commissioned to undertake a Biodiversity Impact Assessment (BIA) by Northport FPR Ltd of a site known as Fawe Park Road, within the London Borough of Wandsworth.

This document has been produced to support a submission to designate the site for housing as part of the Wandsworth local plan. The indicative designation would be to construct 78 residential units, ranging from 3 to 4 storey in height, also comprising landscaped areas, a new road with two turning points and off-street parking for the properties. The proposal is also for the demolition of two terraced properties in Fawe Park Road to create vehicle and pedestrian access to site.

The assessment aimed to quantify the predicted change in ecological value of the site in light of the proposed development to assess compliance against local and national planning policy.

2.1 SITE DESCRIPTION

The survey area extends to approximately 1.5 ha and is centred on National Grid Reference TQ 247 750.

The survey area extends to approximately 1.5 hectares (ha) and comprises regenerative broad leaved woodland, dense scrub, buildings and scattered trees. It is located within the London Borough of Wandsworth. Fawe Park Road boarders the northern boundary of the site and the main overground train line to Waterloo Station borders the southern boundary of the site. Residential housing dominates the wider surrounding land uses.

The site is well connected to the wider railway embankment of the east Putney railway cutting to the east. In the wider landscape Wandsworth Park and the River Thames are north of the site.

2.2 PROPOSED HABITAT CREATION

Proposed habitat creation within the scheme includes the following:

- 0.0793ha of introduced shrub planting;
- 0.0209ha of pond;
- 0.2067ha of vegetated gardens;
- 0.1952ha of biodiverse green roof;
- Planting of 56 new trees (equivalent to 0.0253ha of canopy cover); and
- 0.0305ha of scrub planting.

Proposals also include the retention and enhancement of 0.4908ha of the existing deciduous woodland to form a linear vegetative buffer to the railway line and retaining the SINC's function as a wildlife corridor.

3.0 METHODOLOGY

3.1 DEFRA METRIC

To calculate the ecological value of the pre- and post-development site, the DEFRA Metric 3.0 methodology was utilised, following best practice guidance from DEFRA[1,2] , and joint guidance from CIEEM, IEMA and CIRIA[3].

This metric uses Biodiversity Units as a proxy for the ecological value of area of linear based habitats. The areas of each habitat parcel are measured, with each parcel assigned a 'Distinctiveness' and 'Condition' score. Distinctiveness is a default score for the habitat classification, representing its inherent ecological value, whereas condition refers to the state each parcel is in relative to predetermined set of criteria outlined in the supplementary Defra Metric 3.0 guidance.

For post-development habitat areas, additional multipliers are applied taking into account the time taken to reach maturity and difficulty of creation of the habitats, and whether the habitat creation is in a strategically beneficial location.

An assessment of the predicted change in ecological value is undertaken comparing the Biodiversity Units and assessing percentage change. Changes in broader habitat types (for example, 'Urban', 'Woodland' and 'Grassland' habitats) are also tracked, and trading habitats is discouraged unless specifically targeted within a local strategy. Trading down of habitats is not permitted.

3.2 BASELINE CALCULATION

To calculate pre-development Biodiversity Units, data collected during a Preliminary Ecological Appraisal (PEA) undertaken by Greengage in July 2021 was assessed (doc ref: 551734sb16sep21FV04_PEA). Areas of each habitat type were taken from the Phase 1 Habitat Map (Figure 1) and data relating to the condition of habitat parcels was collected in the field.

3.3 PROPOSED DEVELOPMENT CALCULATIONS

Area sizes of the proposed development used for this assessment were provided by the landscape architect. The proposed site layout can be seen in Appendix A.

Greengage took into account the future likely use of the site to allocate targeted/likely condition scores.

3.4 COMPENTENCIES

Jess Cole, who undertook this assessment, has a BSc degree in Ecology (Hons) and is a Graduate member of CIEEM. Jess holds a Natural England Great Crested Newt Licence (2016-24975-CLS-CLS) and has over five years' experience in ecological survey and assessment.

Mitch Cooke, who reviewed this report, has a degree in Ecology (Hons), an MSc in Environmental Assessment and Management, and is a Full member of CIEEM with over 35 years' experience in

ecological survey and assessment. Mitch has set up and developed ecological and environmental teams for nearly 20 years and has undertaken and managed numerous ecological surveys and assessments. He is the Director at Greengage and manages the team.

This report was written by Jess Cole and reviewed and verified by Mitch Cooke who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

3.5 CONSTRAINTS

The assessment methodology does not incorporate ecological features beyond area and linear based habitats. The potential for the site to support protected species, for example, is not captured by this assessment. As such this report should be read in conjunction with all other ecological reports for the site. The mitigation hierarchy in relation to protected and notable habitats and species much be followed. This report should accordingly be read in conjunction with the PEA and any other appropriate protected species surveys.

The BNG assessment at this stage is predictive in nature. To ensure delivery of BNG, requirements outlined within this report must be adhered to, and a rigorous programme of monitoring and maintenance must be implemented.

4.0 RESULTS

4.1 BASELINE CONDITIONS

The baseline biodiversity value of the site is calculated to be 8.39 biodiversity units. A breakdown of this calculation is provided in Table 4.1 below:

Table 4.1 Baseline Biodiversity Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Biodiversity Units
Woodland and forest	Lowland mixed deciduous woodland	0.9759	High	Poor	5.86
Heathland and shrub	Bramble scrub	0.3883	Medium	Poor	1.55
Urban	Buildings*	0.0401	Very Low	N/A	0.00
Urban	Vegetated garden	0.0137	Low	Poor	0.03
Urban	Urban Tree	0.0791**	Medium	Good	0.95
				TOTAL	8.39

*Denoted as Developed land; sealed surface in the Defra Metric 3.0.
**Not included in total site area

The woodland on site did include trees of a native tree species with a range of age classes, from mature trees to saplings closer to the rail line; there were no veteran trees. All trees appeared to be in fair condition, with some ivy (*Hedera helix)* cover. The understorey was limited to bramble (*Rubus fruticosus*) and nettle (*Urtica dioica*) with invasive species present also (see the PEA for further details [Doc Ref: 551734sb16sep21FV04_PEA]). There was limited ground flora. There was some deadwood present which provided habitat for stag beetle (*Lucanus cervus*) (see the PEA for further details [Doc Ref: 551734sb16sep21FV04_PEA]). Overall the woodland scores 24 out of a possible 39, meaning it is classed as 'Poor' condition.

The scrub present on site is almost entirely dominated by bramble. There are no glades in the scrub meaning there is no opportunity for ground flora to establish. Furthermore, invasive species were present throughout the site, including amongst this scrub habitat (see the PEA for further details [Doc Ref: 551734sb16sep21FV04_PEA]). This scrub therefore meets none of the condition criteria and is therefore considered to be of 'poor' quality.

Buildings are automatically given 'very low' distinctiveness and do not require a condition assessment.

The gardens were individually owned by the residents of 52-54 Fawe Park road. These gardens were therefore not accessible at the time of the initial walkover survey. There is likely to be a variation in the provision of planting with value to wildlife, and therefore a vast variation in the condition of these garden spaces. Therefore, in order to account for the deviation in habitat provision which will inevitably occur, it is unlikely that the gardens would achieve any of the condition criteria for urban habitats and therefore the condition score is 'Poor'.

There were some scattered trees outside the areas of woodland, these consisted mostly of semi-mature ash (*Fraxinus excelsior*) and sycamore (*Acer pseudoplatanus*). All trees appeared to be in fair condition, with some ivy cover, with no obvious sign of disease or decay. In most cases there was limited vegetation beneath the trees, with common nettle where recorded; this meant the habitat structure usually associated with tree habitats was not present. Therefore, the existing trees meet 4 of the 6 condition criteria, and the condition of the trees on site is therefore considered to be 'Moderate'.

Assessment Criteria for the above habitats is given in Appendix B.

4.2 PROPOSED SITE LAYOUT

Based on masterplan drawings, the proposed development is predicted to provide 5.77 biodiversity units, this includes the units gained through habitat creation, (2.20), and the habitats units from retained and enhanced woodland (3.57).

Habitat Creation

The table below shows the habitat units gained through new habitat creation.

Table 4.2 Post-Development Biodiversity Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Biodiversity Units
Urban	Introduced shrub	0.0793	Low	Poor	0.15
Lakes	Ponds (Non- Priority Habitat)	0.0209	Medium	Good	0.21
Urban	Play space*	0.0292	Very Low	N/A	0.00

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Biodiversity Units
Urban	Buildings and hardstanding*	0.3654	Very Low	N/A	0.00
Urban	Vegetated garden	0.2067	Low	Poor	0.40
Urban	Biodiverse roof**	0.1952	Medium	Good	1.10
Urban	Urban Tree***	0.0253	Medium	Moderate	0.08
Heathland and shrub	Mixed scrub	0.0305	Medium	Good	0.26
				TOTAL	2.20

* Denoted as Developed land; sealed surface in the Defra Metric 3.0.

**Denoted as Extensive green roof in the Defra Metric 3.0.

*** Not included in total site area

The areas of proposed introduced shrub will use mostly native shrub and herbaceous species chosen from the Royal Horticultural Society (RHS) Good for Pollinators Guide[4]. These species will provide a nectar resource for pollinator species all year round, which in turn will provide a foraging resource for bats and birds. Therefore, in theory this habitat could meet up to two or three of the condition criteria for urban habitats, However, under the current Defra Metric 3.0 methodology, the condition value of introduced shrub is limited at 'Poor'.

A pond will be established post development, which will diversify the habitat provision on site post development and appeal to additional target species. The pond will be established primarily for the benefit of wildlife, meaning there will be no fish stock, and will be built in accordance with the guidance from the RSPB[5], with a range of gradients, to accommodate a range of amphibians, and native aquatic vegetation to provide shelter. No invasive species will be used and management will include the removal of any invasives which establish, including the removal of duckweed. The pond will be located within least 10m of the woodland habitats, which increased its attractiveness to amphibious species which hibernate on land. With the above in mind the pond is likely to achieve 9 of 9 of condition criteria for urban habitats and therefore a condition score of 'Good'.

Buildings and hardstanding are automatically given 'very low' distinctiveness and do not require a condition assessment.

For the same reasons presented within the baseline value justification above in section 4.1 there is likely to be a variation in the extent and quality of the vegetation provided within each private garden space, and, therefore, the target condition cannot be above 'Poor'.

Extensive biodiverse roof will be included on the flat roofs on top of the new buildings. In accordance with best practice these living roofs will be substrate based, plug planted and seeded with a wildflower mix, such as the Emorsgate wildflower mix for green roofs[6] which includes 20 wildflower species with value to pollinators. The substrate will be composed of recycled crushed brick, expanded clay shale and recycled organic content (for example Bauder's Biodiverse Substrate[7]) which would mimic the mosaic habitat of recently disturbed land, and allow for the growth of early successional communities such as mosses and lichens, as well as allow for bare patches. No invasive species will be used and management will include the removal of any invasives which establish. These roofs will also feature additional habitat features such a log piles, sandy piles, rope coils and stone piles in order to increase the interest for a wider range of invertebrates, including rare saprophytic Beatles and solitary bee species. It is also expected that these roofs will be regularly and periodically managed by a dedicated and specialised contractor meaning it is highly likely that these roofs will achieve all three condition criteria for urban habitats and therefore a condition score of 'Good'.

The trees to be planted will be predominantly native species, and will be planted mostly along streets, where they will provide a corridor into the existing and newly created green habitats on site, creating a continuous canopy which is of use to a range of species including nesting birds and foraging and commuting bats. Whilst management will seek to maintain these trees in a good condition their location within the public realm cannot rule them out from being accidently damaged. Therefore. it is considered that the maximum number of condition criteria this habitat is likely to reach is 4 of 6, meaning the condition target is 'Moderate'.

The scrub habitat will be provided as an additional space for nature and will be located in the area where the viaduct currently stands. The species used will comprise woody scrub species such as, hazel (*Corylus avellana*), hawthorn (*Crataegus sp.*), blackthorn (*Prunus spinosa*), holly (*Ilex* aquifolium*) and* alder (*Alnus glutinosa*) and would be managed by rotational cutting so to create different levels to the structure, including glades where ground flora can establish. No invasive species will be used and management will include the removal of any invasives which establish. The scrub habitat is therefore expected to meet 5 out of the 5 condition criteria for scrub, and therefore is targeted as 'Good' condition.

Assessment Criteria for the above habitats is given in Appendix B.

Habitat Enhancement

The below table shows how the retained woodland would be enhanced to provide additional units.

Table 4.3 Habitat Enhancement

Broad Habitat	Habitat Type	Area enhanced (Hectares)	Distinctiveness	Condition- Pre Construction	Biodiversity Units- Pre Construction	Condition- Post Construction	Biodiversity Units- Post Construction
Woodland and forest	Lowland mixed deciduous woodland	0.4908	High	Poor	2.94	Good	3.57

The woodland will be enhanced from 'Poor' to 'Good'. The invasive species will be removed sensitively, and the understory and ground flora planting will be enhanced using native planting and seeding to create structure and levels within the woodland. Additional deadwood will be provided, and the woodland will be managed to retain any newly fallen deadwood. It is therefore expected that the woodland will achieve a score of between 33-39 post development.

Assessment Criteria for the above habitats is given in Appendix B.

5.0 EVALUATION AND DISCUSSION

The proposed development has sought to maximise the biodiversity value of the landscaping plan and features within the built form, following best practice and delivering a range of habitats as part of the overall proposals. Furthermore, these have been designed to act as stepping stones for wildlife, and provide foraging resources for birds and bats. The 8m vegetative buffer along the railway line provides the linear wildlife corridor function for the SINC as part of the overall biodiversity strategy for the site.

Although, the opportunities for enhancement have been maximised, the current development proposals, result in a post-development area-based value of 5.77, which is a net loss of 2.68 biodiversity units from pre-development levels (equating to a 31.30% loss). It should be noted that these figures are preliminary only and this assessment should be re-calculated once finalised landscaping is available.

It should be noted that according to the trading rules of the Defra Metric 3.0 methodology, high distinctiveness habitats, such as deciduous woodland, if lost from site, should be replaced with similarly high distinctiveness habitat post development, in the same quantities as it is lost. The proposals result in the loss of 0.4851ha regenerative woodland.

The most effective way of minimising this loss or creating a situation of biodiversity net gain, would be to retain and enhance more of the existing woodland habitat. However, the development proposals would not be viable if any more than the habitat were to be retained. Therefore, under the current development proposals, and the need to provide 78 units, the scheme is considered to be maximising on site opportunities for ecological enhancement.

Currently, the proposals do not meet the requirements in the national policy (NPPF) which requires a net gain in biodiversity value post-development.. The emerging Environment Bill requires local authorities to identify opportunities for habitat creation and/or enhancement elsewhere within the Borough, where developments cannot provide the net gain on site. As such discussions with the LPA, the London Borough of Wandsworth, on offsite provision to offset the loss of biodiversity units will be undertaken and the mechanism for how this will be delivered.

6.0 SUMMARY & CONCLUSION

Greengage was commissioned to undertake a BIA by Northport FPR Ltd of a site known as Fawe Park Road, within the London Borough of Wandsworth.

Although, the opportunities for enhancement have been maximised, the current development proposals, result in a post-development area-based value of 5.77, which is a net loss of 2.68 biodiversity units from pre-development levels (equating to a 31.30% loss). It should be noted that these figures are preliminary only and this assessment should be re-calculated once finalised landscaping is available.

The scheme considered to be maximising the opportunity for onsite ecological enhancement in light of the development proposals.

Additional enhancement recommendations are made within the PEA report (Doc ref: 551734sb16sep21FV04_PEA), such as provision of bird and bat boxes and invertebrate habitat features. These features will contribute to the enhancement of the quantitative biodiversity value of the site however they do not change the qualitative result described above.

Currently, the proposals do not meet the requirements in the national policy (NPPF) which requires a net gain in biodiversity value post-development. The emerging Environment Bill requires local authorities to identify opportunities for habitat creation and/or enhancement elsewhere within the Borough, where developments cannot provide the net gain on site. As such discussions with the LPA, the London Borough of Wandsworth, on offsite provision to offset the loss of biodiversity units will be undertaken and the mechanism for how this will be delivered.

Detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and long-term management should be provided within an Ecological Management Plan (EMP) for the site which could be secured through planning condition. Should these recommendations be adhered to, the proposals stand to be compliant with legislation and current planning policy.

FIGURE 1 SITE PLAN AND HABITAT MAP

APPENDIX A LANDSCAPE PLAN/STRATEGY

APPENDIX B CONDITON ASSESSMENT

A.1 CONDITION ASSESMENT FOR WOODLAND

Indicator		Good (3 Points)	Moderate (2 Points)	Poor (1 Point)
1	Age distribution of trees	Three age classes present	Two age classes present	One age class present
2	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland	Evidence of significant browsing pressure is present in 40% or less of whole woodland	Evidence of significant browsing pressure is present in 40% or more of whole woodland
3	Invasive plant species	No invasive species present in woodland	Rhododendron or laurel not present, other invasive species < 10% cover	Rhododendron or laurel present, or other invasive species > 10% cover
4	Number of native tree species	Five or more native tree or shrub species found across woodland parcel	Three to four native tree or shrub species found across woodland parcel	None to two native tree or shrub species across woodland parcel
5	Cover of native tree and shrub species	> 80% of canopy trees and >80% of understory shrubs are native	50-80% of canopy trees and 50-80% of understory shrubs are native	< 50% of canopy trees and <50% of understory shrubs are native
6	Open space within woodland	10 – 20% of woodland has areas of temporary open space, unless woodland is <10ha in which case lower	21- 40% of woodland has areas of temporary open space	More than 40% of woodland has areas of temporary open space
7	Woodland regeneration	All three classes present in woodland; trees 4-7cm dbh, saplings and seedlings or advanced coppice regrowth	One or two classes only present in woodland	No classes or coppice regrowth present in
8	Tree health	Tree mortality less	11% to 25% mortality	Greater than 25%

Indicator		Good (3 Points)	Moderate (2 Points)	Poor (1 Point)
		than 10%, no pests or diseases and no crown dieback	and/or crown dieback or low risk pest or disease present	tree mortality and or any high risk pest or disease present
9	Vegetation and ground flora	Ancient woodland flora indicators present	Recognisable NVC plant community present	No recognisable NVC community
10	Woodland vertical structure	Three or more storeys across all survey plots or a complex woodland	Two storeys across all survey plots	One or less storey across all survey plots
11	Veteran trees	Two or more veteran trees per hectare	One veteran tree per hectare	No veteran trees present in woodland
12	Amount of deadwood	50% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps	Between 25% and 50% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps	Less than 25% of all survey plots within the woodland parcel have standing deadwood, large dead branches/ stems and stumps
13	Woodland disturbance	No nutrient enrichment or damaged ground evident	Less than 1 hectare in total of nutrient enrichment across woodland area and/or less than 20% of woodland area has damaged ground	More than 1 hectare of nutrient enrichment and/or more than 20% of woodland area has damaged ground

Condition Assessment Result	Condition Assessment Score
Total score >32 (33 to 39)	Good (3)
Total score 26 to 32	Moderate (2)
Total score less than 26 (13-25)	Poor(1)

A.2 CONDITION ASSESSMENT FOR SCRUB

1. Habitat is representative of UKHab description (where in its natural range). There are at least three woody species, with no one species comprising more than 75% of the cover (except common juniper, sea buckthorn or box, which can be up to 100% cover).
2. There is a good age range – all of the following are present: seedlings, young shrubs and mature shrubs.
3. There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981) and undesirable species1 make up less than 5% of ground cover.
4. The scrub has a well-developed edge with scattered scrub and tall grassland and/or herbs present between the scrub and adjacent habitat(s).
5. There are clearings, glades or rides present within the scrub, providing sheltered edges.

Condition	Assessment Criteria	Score
Good	Passes 5 of 5 criteria	3
Moderate	Passes 3 or 4 of 5 criteria	2
Poor	Passes 0, 1 or 2 of 5 criteria	1

A.3 CONDITION ASSESSMENT CRITERIA FOR URBAN TREES

1. More than 70% of trees are native species.
2. Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.
3. More than 50% of trees are mature or veteran.
4. There is little or no evidence of an adverse impact on tree health by anthropogenic activities such as vandalism or herbicide use. There is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.
5. Management regime has encouraged micro habitat sites for birds, mammals and insects e.g. presence of deadwood, cavities or loose bark etc.
6. Trees are immediately adjacent to other vegetation, and tree canopies are oversailing vegetation beneath.

Condition	Assessment Criteria	Score
Good	Passes 5 or 6 of 6 criteria	3
Moderate	Passes 3 or 4 of 6 criteria	2
Poor	Passes 0, 1 or 2 of 6 criteria	1

A.4 CONDITION ASSESSMENT FOR URBAN HABITATS

1. Vegetation structure is varied, providing opportunities for insects, birds and bats to live and breed. A single ecotone (i.e. scrub, grassland, herbs) should not account for more than 80% of the total habitat area.
2. There is a diverse range of flowering plant species, providing nectar sources for insects. These species may be either native, or non-native but beneficial to wildlife. NB - To achieve GOOD condition, criterion 2 must be satisfied by native species only (rather than non-natives beneficial to wildlife).
3. Invasive non-native species (Schedule 9 of WCA) cover less than 5% of total vegetated area. NB - To achieve GOOD condition, criterion 3 must be satisfied by a complete absence of invasive non-native species (rather than

Condition	Assessment Criteria	Score
Good	• Passes 3 of 3 core criteria; AND • Meets the requirements for good condition within criteria 2 and 3	3
Moderate	• Passes 2 of 3 core criteria; OR • Passes 3 of 3 core criteria but does not meet the requirements for good condition within criteria 2 and 3	2
Poor	• Passes 0 or 1 of 3 core criteria	1

6.1 CONDITION ASSESSMENT FOR PONDS

1. The pond is of good water quality, with clear water (low turbidity) indicating no obvious signs of pollution. Turbidity is acceptable if the pond is grazed by livestock.

2. There is semi-natural habitat (i.e. moderate distinctiveness or above) for at least 10 m from the pond edge.
3. Less than 10% of the pond is covered with duckweed or filamentous algae.
4. The pond is not artificially connected to other waterbodies, either via streams, ditches or artificial pipework.
5. Pond water levels should be able to fluctuate naturally throughout the year. No obvious dams, pumps or pipework.
6. There is an absence of non-native plant and animal species.
7. The pond is not artificially stocked with fish. If the pond naturally contains fish, it is a native fish assemblage at low densities.
8. In non-woodland ponds, plants, be they emergent, submerged or floating (excluding duckweeds)3 , should cover at least 50% of the pond area that is less than 3 m deep.

9. The surface of non-woodland ponds is no more than 50% shaded by woody bankside species.

Condition	Assessment Criteria	Score
Good	Passes 9 of 9 criteria	3
Moderate	Passes 6, 7 or 8 of 9	2
Poor	Passes 0, 1, 2, 3, 4 or 5 of 9 criteria	1

APPENDIX C LEGISLATION AND POLICY

C.1 POLICY

National

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) 2021[8] sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: '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'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

The London Plan[9]

Policy G1 Green infrastructure

10. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.
11. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
12. Development Plans and Opportunity Area Planning Frameworks should:
    1. identify key green infrastructure assets, their function and their potential function
    2. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
13. Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

Policy G5 Urban greening

14. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

15. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. (excluding B2 and B8 uses).
16. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

Policy G6 Biodiversity and access to nature

17. Sites of Importance for Nature Conservation (SINCs) should be protected.
18. Boroughs, in developing Development Plans, should:
    a. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
    b. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
    c. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
    d. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
    e. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
19. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
    a. avoid damaging the significant ecological features of the site
    b. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
    c. deliver off-site compensation of better biodiversity value.
20. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
21. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

1. London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
2. In their Development Plans, boroughs should:
    a. Protect 'veteran' trees and ancient woodland where these are not already part of a protected site
    b. Identify opportunities for tree planting in strategic locations
3. Development proposals should ensure that, wherever possible, existing trees of quality are retained [Category A and B]. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

London Environment Strategy 2018[10]

The Mayor's Environment Strategy was published in May 2018. This document sets out the strategic vision for the environment throughout London. Although not primarily a planning guidance document, it does set strategic objectives, policies and proposals that are of relevance to the delivery of new development in a planning context, including:

Objective 5.1 Make more than half of London green by 2050

Policy 5.1.1 Protect, enhance and increase green areas in the city, to provide green infrastructure services and benefits that London needs now.

This policy states:

"New development proposals should avoid reducing the overall amount of green cover and, where possible, seek to enhance the wider green infrastructure network to increase the benefits this provides. […] New developments should aim to avoid fragmentation of existing green space, reduce storm water run-off rates by using sustainable drainage, and include new tree planting, wildlife-friendly landscaping, or features such as green roofs to mitigate any unavoidable loss".

This supports the 'environmental net gain' approach promoted by government in the 25 Year Environment Plan.

Proposal 5.1.1.d The London Plan includes policies to green streets and buildings, including increasing the extent of green roofs, green walls and sustainable drainage.

Objective 5.2 conserving and enhancement wildlife and natural habitats

Policy 5.2.1 Protect a core network of nature conservation sites and ensure a net gain in biodiversity

This policy requires new development to include new wildlife habitat, nesting and roosting sites, and ecologically appropriate landscaping will provide more resources for wildlife and help to strengthen ecological corridors. It states:

"Opportunities should be sought to create or restore priority habitats (previously known as UK Biodiversity Action Plan habitats) that have been identified as conservation priorities in London [and] all land managers and landowners should take BAP priority species into account".

C.2 LOCAL

The Wandsworth Biodiversity Strategy

Sets out five key principles which will guide the priorities for borough-wide collaborative action at the landscape scale to protect and enhance biodiversity and to make nature accessible to all:

1. Better: Improving the quality of existing priority habitats and landscapes
2. Bigger: expanding the areas of priority habitats and landscapes
3. More: creating new areas of habitat or new landscapes
4. Joined-up: improving links and connectivity between habitats at the landscape scale
5. Promote: informing local individuals and communities about how they can understand and appreciate priority habitats and landscapes and crucially the role they have in delivering measures to nurture wildlife on their doorstep.

The strategy includes implementing measures that will ensure biodiversity research and evidence is kept up to date, that priority places, habitats and species are protected, well managed and enhanced and that overarching issues such as invasive non-native species, and biodiversity net gain are understood and necessary guidance is made available.

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Greengage

Fawe Park Road, Northpoint Property
Protected Species Survey Report – December 2021

QA

Fawe Park Road – Protected Species Survey Report

Issue/Revision:	Draft	Final
Date:	January 2022	January 2022
Comments:		
Prepared by:	Sam Barker	Sam Barker
Signature:		
Authorised by:	Jess Cole	Mitch Cooke
Signature:		
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CONTENTS

1.0 EXECUTIVE SUMMARY

1.1 Greengage Environmental Ltd was commissioned by Northpoint Property to undertake a suite of protected species surveys at a site known as Fawe Park Road, Putney, London Borough of Wandsworth.

1.2 This document has been produced to support a submission to allocate the site for housing as part of the Wandsworth Local Plan 'Call for Sites' process. The allocation provides an indication for 78 residential units, ranging from 3 to 4 storey in height, associated landscaped areas, a new road with two turning points and off-street parking for the properties. The allocation would also include the demolition of two terraced properties in Fawe Park Road to facilitate vehicle and pedestrian access to site.

1.3 The site sits within a Site of Importance for Nature Conservation (SINC) of Borough Grade II importance within Wandsworth, designated for its role as a wildlife corridor.

1.4 After the completion of the initial walkover survey to inform the Preliminary Ecological Appraisal (PEA), undertaken by Greengage on the 12th July 2021, further surveys to assess the presence/likely absence of a range of species was recommended. See PEA report for further details (Doc Ref: 551734sb16sep21FV02_PEA).

1.5 A number of protected species surveys was undertaken in 2016, by The Ecology Consultancy, as part of the site allocation process. Therefore, based on the findings of walkover undertaken by Greengage, and update these previous survey results, the following further surveys were undertaken during the 2021 survey season:

- Bat Activity surveys;
- Bat Emergence/Re-entry Surveys;
- Badger (*Meles meles*) sett monitoring survey; and
- Stag Beetle (*Lucanus cervus*) presence/likely absence survey.

1.6 The Ecology Consultancy also undertook reptile presence likely absence survey. This survey found a likely absence of reptiles from site. This result coupled with the fact that the habitat has become increasingly overgrown in the period since 2016, meant that Greengage assessed the site as being unsuitable for reptiles. An updated reptiles survey was therefore not undertaken during the 2021 season.

1.7 The 2021 protected species surveys were undertaken over four months from July to October 2021.

1.8 The following findings were made during the suite of surveys:

- Moderate levels of foraging and commuting activity associated with six species/group of species of bats across July, August, September and October;
- Two summer transitional/day soprano pipistrelle bat roosts within Building 1 (the viaduct);

- Stag beetle identified in the west of the site; and
- No badger activity was recorded.

1.9 The above results have informed appropriate mitigation, compensation and enhancement recommendations associated with the potential impact and the ecological enhancement specifications, can be found in Section 6 of this report. Where appropriate, further detail on these will be provided with a stand-alone Ecological Management Plan (EMP) to support a planning application or subsequent planning conditions. No further surveys or design details are required at this stage to determine the potential impacts, appropriate mitigation, compensation and enhancements.

1.10 Although not surveyed for, this report also assesses the impact of the proposed development on hedgehog (*Erinaceus europaeus*) and other small mammal species likely to use the site.

1.11 Upon successful implementation of all mitigation compensation and enhancement measures, the development proposals are considered to result in a neutral or positive impacts on each of the specified ecological receptors during both the construction and operational phase of the development

1.12 The proposals are considered to be in full compliance with legislation and policy surrounding the protection of protected species and green infrastructure. Furthermore, the function of the SINC as a wildlife corridor will be maintained.

2.0 INTRODUCTION

2.1 Greengage was commissioned by Northpoint Property to undertake a suite of protected species surveys at a site known as Fawe Park Road, Putney, London Borough of Wandsworth.

2.2 This document has been produced to support a submission to allocate the site for housing as part of the Wandsworth Local Plan 'Call for Sites' process. The allocation provides an indication for 78 residential units, ranging from 3 to 4 storey in height, associated landscaped areas, a new road with two turning points and off-street parking for the properties. The allocation would also include the demolition of two terraced properties in Fawe Park Road to facilitate vehicle and pedestrian access to site.

2.3 The site sits within a Site of Importance for Nature Conservation (SINC) of Borough Grade II importance within Wandsworth, designated for its role as a wildlife corridor.

SITE DESCRIPTION

2.4 The survey area extends to approximately 1.5 ha and is centred on National Grid Reference TQ 247 750, located within the London Borough of Wandsworth.

2.5 Fawe Park Road boarders the northern boundary of the site and the main overground train line to Waterloo Station borders the southern boundary of the site. Residential housing dominates the wider surrounding land uses.

2.6 The site is connected to the wider railway embankment of the east Putney railway cutting to the east. In the wider landscape Wandsworth Park and the River Thames are north of the site but there are no green corridors linking these to the site. The site forms part of the Putney Railway Cuttings, a borough grade II Site of Importance for Nature Conservation (SINC).

SITE ALLOCATION DESCRIPTION

2.7 The allocation seeks the accommodation of 78 residential units, ranging from 3 to 4 storey in height, and associated landscaped areas, a new road with two turning points and off street parking for the properties. The allocation would also include the demolition of two terraced properties in Fawe Park Road to facilitate vehicle and pedestrian access to site.

Landscaping proposals

2.8 The landscape proposals seek to retain as much of the existing vegetation as possible, this would mostly be at either end of the site. A 'green' street will be created along the main spine of the site, using street tree planting and linear shrub planting. Areas of vertical screening around the bin stores will be incorporated. Areas of shrub planting will be incorporated along the new access road and around the car parking spaces.

2.9 In the east of the site a rain garden will be built and green roofs installed on the apartment buildings and on the retained viaduct.

EXISTING ECOLOGICAL INFORMATION

2.10 A number of ecology surveys was undertaken in 2016 by The Ecology Consultancy in support of proposed development approach. The surveys undertaken included:

- A Phase 1 habitat survey including a desk study using results from Greenspace Information for Greater London (GIGL);
- Preliminary bat roost assessment of trees and buildings;
- Bat activity survey;
- Bat emergence/re-entry survey;
- Invertebrate survey; and
- Reptile survey presence/likely absence survey.

2.11 The key findings included:

- Bat:
  - 16 trees were identified as having low bat roosting potential;
  - One building (the viaduct) was identified as having moderate bat roosting potential;
  - The two residential buildings were identified as having low bat roosting potential;
  - No roosts were identified on site; and
  - Common pipistrelles and soprano pipistrelles were recorded foraging and commuting throughout the site.
- Invertebrate:
  - 263 invertebrate species were identified on site, none of which are Species of Principle Importance listed under Section 41 of the Natural Environment and Rural Communities Act 2006 (as amended).
- Reptile:
  - Likely absence of reptiles on site was concluded.

PRELIMINARY ECOLOGICAL APPRAISAL – 2021

On Site Survey

2.12 An initial walkover survey of the site was completed to inform the Preliminary Ecological Appraisal (PEA), undertaken by Greengage on the 12th July 2021 (Doc Ref: 551734sb16sep21FV02_PEA). The survey consisted of a phase 1 survey, bat and badger scoping survey.

2.13 The phase 1 survey confirmed the sites habitat composition, which was found to be broad leaved woodland, dense scrub, buildings and scattered trees.

2.14 These habitats were deemed suitable for a range of protected species including bat, badger and stag beetle. At the time of the survey, it was possible to undertake a scoping assessment of the site for roosting bat and badger. The results of these assessments found the following:

- One potential badger sett was found on site;
- As well as the 16 trees identified during the previous survey, an additional nine trees with 'low' bat roosting potential were recorded;
- One building (building 1) with 'moderate' roosting potential was identified; and
- Two buildings (buildings 2 and 3) with 'low' roosting potential were found.

2.15 Five non-native/invasive species were also identified during this walkover (Japanese knotweed (*Fallopia japonica),* virginia creeper (*Parthenocissus quinquefolia)*, snowberry (*Symphoricarpos albus)*, buddleia (*Buddleja davidii*) and green alkanet(*Pentaglottis sempevirens)*). Details on their location and status can also be found within the PEA (Doc Ref: 551734sb16sep21FV02_PEA).

2.16 As well as these species the potential for the site to support foraging and commuting bats, breeding birds, stag beetle and hedgehog was also identified.

2.17 The Ecology Consultancy also identified the site as having suitability to support reptiles, however, the habitat has become increasingly overgrown in the period since 2016, and Greengage deemed the site as unsuitable for reptiles. An updated reptile survey was therefore not considered necessary.

Desk Based Assessment

2.18 Consultations with the Greenspace Information for Greater London (GIGL) and the multi-Agency Geographic Information for the Countryside (MAGIC) datasets identified Wimbledon Common Special Area of Conservation (SAC) as the only statutory designated site recorded within 2km of the site, with Richmond Park SAC located 3.28km west of the site.

2.19 Records from GIGL also identified eight additional SINC within 2km of the site boundary.

2.20 A number of Protected and BAP priority species were recorded within 2km of the site, among those that are of relevance to the site included:

- Bird species included – lesser redpoll (*Acanthis cabaret)*, house sparrow (*Passer domesticus*) and black redstart (*Phoenicurus ochruros)*;
- Mammals – Hedgehog (*Erinaceus europaeus)* and badger (*Meles meles*);
- Bat species – serotine (*Eptesicus serotinus)*, daubenton's bat (*Myotis daubentonii)*, lesser nectule (*Nyctalus leisleri*), noctule (*Nyctalus noctula*), common pipistrelle (*Pipistrellus pipistrellus)*, nathusius' pipistrelle (*Pipistrellus nathusii*) and soprano pipistrelle (*Pipistrellus pygmaeus*); and
- Notable invertebrates – stag beetle (*Lucanus cervus*), small heath (*Coenonympha pamphilus pamphilus*), wall butterfly (*Lasiommata megera*) and white admiral (*Limenitis camilla*).

3.0 METHODOLOGY

3.1 The surveys were undertaken in accordance with best/good practice guidelines associated with surveys for each species/group of species. The methodology that was followed for each species/group of species is detailed individually below.

BAT ACTIVITY SURVEYS

3.2 Bat activity surveys were undertaken across the site, undertaken in line with BCT Good practice Guidelines (2016)[1].

3.3 The surveys entailed:

- Walked activity surveys each month (July – October) consisting of one walked transects; and
- The installation of two static bat detectors in strategic locations across the site each month (July – October).

3.4 The transect route and static locations can be found at Figure 1 in Appendix 1.

3.5 The walked transects commenced at sunset and continued until 2 hours thereafter.

3.6 The surveyors who walked these transects were equipped with Echometer bat detectors which detect the bat calls and allows the surveyors to identify the species in the field.

3.7 Surveys were undertaken during suitable weather conditions e.g. fairly calm weather and no heavy wind or rain, with sunset temperatures ranging between 13◦C and 28◦C, in accordance with the guidance.

3.8 The two statics, SM4BAT Zero Crossing static bat detectors fitted with ultrasonic SMM-U2 microphones, were installed on site each month and left to record for five consecutive nights. The data was then analysed using the bat sound analysis software 'Analook'.

BAT EMERGENCE/RE-ENTRY SURVEYS

3.9 The scoping survey identified two buildings (buildings 2 and 3) with 'low' bat roosting potential and on building (building 1) with 'moderate' bat roosting potential.

3.10 In accordance with Guidance from BCT[1] a single emergence/re-entry survey is required for low potential buildings and two are required for high potential buildings.

3.11 Six locations across the site were identified which would enable the potential roosting features, and confirmed rooting features, to be observed sufficiently. These locations are indicated in Figure 2 within Appendix 1.

3.12 The emergence and re-entry surveys took place in suitable weather conditions (sunset temperatures between 12°C and 28°C, calm weather and no heavy wind or rain) in accordance with the good practice guidance.

3.13 The dusk emergence surveys commenced 15 minutes before sunset and ran for 1.5 hours thereafter.

3.14 The dawn re-entry surveys commenced 1.5 hours before sunset and continued for 15 minutes thereafter.

3.15 Table 3.1 provides detail on location of each surveyor and conditions during each of the emergence survey.

Table 3.1 Surveyor locations and conditions during the emergence surveys

Date	Locations Surveyed	Sunset/Sunrise Time	Survey Duration	Weather Conditions
26/08/21	B1	20:01	19:50 – 21:31	Clear, dry and still (17°C - 16°C)
27/08/21	B2 & B3	06:04	04:34 – 06:19	Partly cloudy, dry and light breeze (15°C - 15°C)
17/09/21	B1	06:38	05:08 – 06:53	Clear, dry and light breeze (14°C - 12°C)

3.16 All surveyors were equipped with an Echo Meter Touch bat detector to detect, visualise and record the calls of any bats present in the area.

BADGER SETT MONITORING

3.17 In accordance with Natural England's online guidance[2] the potential sett was monitored to determine whether the sett is in use by badgers or another species, such as fox, and if badgers are present, to classify the sett as either a main, annex, subsidiary or outlier sett.

3.18 A trail / surveillance camera was set up outside the entrance hole. The camera was in place for a total of four weeks between 16th September to 13th October 2021.

3.19 The camera was checked each week to ensure they were positioned correctly and continued to function properly. Data were downloaded each week.

3.20 Figure 3 in Appendix 1 shows the location of the potential badger sett and monitoring equipment.

STAG BEETLE SURVEY

3.21 Adapting the survey methods set out in the '*Protocol for the European Stag Beetle Survey*'[3] a presence/absence transect survey was undertaken during a single survey visit on 27th July 2021.

3.22 A transect that encapsulated all areas of the site that were accessible was designed, the transect commenced half an hour before sunset and continued until sunset. If stag beetles were identified during the survey then the number, sex and activity (dead/remains, copulating, non-flying or flying) were recorded.

3.23 The stag beetle transect survey route is shown on Figure 4 in Appendix 1.

IMPACT ASSESSMENT

Assessment of Conservation Value of Receptors

3.24 Following the completion of the desktop and site surveys the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment[4] have been used to establish the value, or sensitivity, of terrestrial habitats and species impacted by development.

Key Terms

3.25 An impact is defined as 'the resulting in changes to an ecological feature' with an effect being the 'outcome to an ecological feature from an impact.'

3.26 The ecological feature which is being affected by the impact is termed the receptor. Key ecological receptors are features that have been assessed as being of value within the context of the proposals and the impact assessment.

Criteria for Assessing Conservation Value of Terrestrial Ecology Receptors

3.27 The approach to ecological evaluation advocated by the CIEEM guidelines[5] involves professional judgement, based on available guidance and information, together with advice from experts who know the locality of the project and / or the distribution and status of the species or features that are being considered. The analysis aims to assign value to an ecological feature with reference to a defined geographical scale, i.e.:

- International;
- National;
- Regional;
- Borough;
- Local.

3.28 Sites which are subject to statutory and/or non-statutory designation may be readily assigned a value on this scale, for example:

- SACs and SPAs are internationally important sites;
- Sites of Special Scientific Interest (SSSIs) are nationally important sites; and

- Sites of Nature Conservation Importance (SNCIs) (non-statutory) are of borough value.

3.29 Where an area has more than one designation, the highest of these has been used to assign significance. Features of a site that are not the reasons for its designation(s) are assessed and valued according to their intrinsic value.

3.30 In assigning value to species, reference to a species' geographical distribution, and its population status (e.g. widespread, common, rare) and trends (e.g. declining, stable) has been made. A species that is rare and declining may be assigned a higher level of importance than one that is rare but known to be stable. Species which have a significant proportion of their European population in the UK may also be highly valued.

Methods for Assessing Nature and Significance of Ecological Impacts

Impact Identification

3.31 The sensitivity (and recoverability) of receptors to an impact was identified, as far as current knowledge allows, during the impact assessment process. Generally, this was, by necessity, a qualitative assessment based on published literature and best available scientific information.

Impact Characterisation

3.32 Impacts were characterised by reference to the following terms and definitions:

- Positive (a change that improves the quality of the environment);
- Negative (a change which reduces the quality of the environment);
- Extent (the spatial or geographical area over which the impact/effect may occur);
- Magnitude (size, amount, intensity and volume);
- Duration (should be defined in relation to ecological characteristics (such as a species' lifecycle) as well as human timeframes);
- Timing (timing of an activity or change may result in an impact if it coincides with critical life-stages or seasons e.g. bird nesting season.);
- Frequency (the number of times an activity occurs will influence the resulting effect.); and
- Reversibility.

3.33 Consideration was given to the potential for impacts to interact with other impacts (either arising from the proposed development or a different (external) source), thus producing a cumulative effect (often of greater magnitude).

Significance

3.34 For the purpose of impact assessment, 'significant effect' is an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general.

Residual Impacts

3.35 During the impact assessment process, the available means to avoid, minimise or mitigate for negative impacts were identified. Then, subject to their acceptability, these means were incorporated in the design of the proposal, so that the final assessment was of identified impacts that would be left. The consequences for development control, policy guidance and legislative compliance were then identified from the predicted residual impacts.

Assessments of Potential Impacts

3.36 The Table 3.2 below provides definitions for the terms used to describe impacts in each of the sections below covering impacts on terrestrial ecology.

Table 3.2 Definition of terms used in assessment of ecological impacts

Severity	Periodicity	Extent
Positive Negative Neutral	Temporary Short-term Medium-term Long-term Permanent – no recovery to previous state within lifetime of project	Within the site boundary Local Borough Regional (within South East England) National International

3.37 'Neutral' has been used for severity 'where no discernible improvement or deterioration to the existing environment is anticipated'.

SURVEYORS / ASSESSORS

3.38 Sam Barker who undertook the surveys, and wrote this report has a bachelor's degree in Environmental Science (BSc Hons), holds a Natural England Great Crested Newt Licence (2018-33088-CLS-CLS). Sam is an Associate member of CIEEM and has over four years' experience of undertaking ecological assessments for a wide variety of development sites.

3.39 Daniel Perlaki, who also undertook the surveys at site, has an undergraduate degree in Ecology (BSc Hons), a Master's degree in Conservation Science and Policy and is a graduate member of CIEEM.

3.40 Molly Crookshank assisted with the surveys, has a Bachelor's degree in Animal Biology (BSc Hons), a Master's degree in Wildlife Biology and Conservation (MSc) and is a qualifying member of CIEEM.

3.41 Emma Carter, who also assisted with the surveys at site, has an undergraduate degree in Zoology (BSc Hons). Emma is a member of the conservation and research unit (RHCRU) in Africa.

3.42 Jordan McNulty and Natasha Fen-Connor, both Greengage sub-consultants with one years' experience of undertaking bat emergence surveys also assisted on the bat surveys.

3.43 Jess Cole, who reviewed this report has a BSc degree in Ecology (Hons) and is a graduate member of CIEEM. Jess holds a Natural England Great Crested Newt Licence (2016-24975-CLS-CLS) and has over five years' experience in ecological survey and assessment.

3.44 Mitch Cooke, who reviewed this report, has a degree in Ecology (Hons), an MSc in Environmental Assessment and Management, and is a Full member of CIEEM with over 35 years' experience in ecological survey and assessment. Mitch has set up and developed ecological and environmental teams for nearly 20 years and has undertaken and managed numerous ecological surveys and assessments. He is the Director and Greengage and manages the team.

3.45 This report was written by Sam Barker and reviewed and verified by Jess Cole and Mitch Cooke who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

CONSTRAINTS

3.46 The eastern half of the site was inaccessible during the summer and autumn of 2021 due to the overgrown nature of the scrub in this part of the site.

3.47 The two properties north of the site were privately owned, therefore surveys on these could only be undertaken from outside their ownership boundaries.

3.48 Static 2 failed to record for the recording period in September, this skews the findings and numbers of species for this location.

3.49 It is important to understand the limitations associated with the use of static bat detection. Intrinsically static detectors may fail to record bats passing at a certain distance, horizontally or vertically from the microphone. The SM4s do however allow a

certain amount of omni-directionality, with a beam pattern of nearly 360°. Detectors were set to a high trigger sensitivity for recording.

3.50 'Bat passes' were defined as any sound file with bat calls recorded by the detectors. The number of bat calls or bat passes does not directly relate to the number of bats in a location. It is important to be aware that results can be skewed by a single bat recorded sustained foraging in the location of the detector. Nevertheless, sustained foraging would indicate the importance of the location as a resource.

3.51 However, the consideration of the above points does not change the findings or conclusions of this report.

4.0 RESULTS

4.1 This section details the 2021 survey results of each of the survey types discussed above. All maps referred to in this section can be found in Appendix 1 of this report with auxiliary survey data in Appendix 2.

BAT ACTIVITY SURVEYS

4.2 Bat activity surveys were undertaken monthly between July 2021 and October 2021. On each of these occasions the survey comprised a walked transect route and the placement of two static bat detectors on site, which were left in place recording for five consecutive nights. The transect routes and locations of the static detectors can be found in Figure 1 within Appendix 1 of this report.

Static Data Analysis

4.3 Each of the two static detectors were left out for five days each month, the dates of deployment were:

- 27th July – 2nd August;
- 26th August – 31st August for Static 2, and 31st August – 6th September for Static 1;
- 17th September – 22nd September Static 1 only; and
- 7th October – 14th October for Static 2, and 21st – 29th October for Static 1

4.4 Levels of activity varied throughout the sampling periods, with August yielding the highest level of bat activity across the site. Activity levels were at their lowest in September; static 2 did not record activity for September, with activity levels reliant on a wide range of environmental factors.

4.5 Throughout the static monitoring period five species/species groups were encountered, pipistrelle species (common, soprano and nathusius), noctule, leisler's and serotine. Pipistrelle social calls were also identified, mostly during the later sampling months (August – October). This is typical given bats are seeking mates during this period.

4.6 The trends in activity are displayed on the following graphs below. The abbreviations for species used in these graphs can be seen in Table 4.2.

Table 4.1 Species abbreviations

Common name	Scientific name	Abbreviation
Common pipistrelle	*Pipistrellus pipistrelle*	PIPI
Soprano pipistrelle	*Pipistrellus pygmaeus*	PIPY
Nathusius pipistrelle	*Pipistrell nathusii*	NATH
Noctule	*Nyctalus noctula*	NYNO
leisler's	*Nyctalus leisleri*	LEI
Serotine	*Eptesicus serotinus*	ESER
Unidentified *Nyctalus* or *Eptesicus* bat	*Nyctalus sp.* and *Eptesicus sp.*	BIG

Monthly pass rate

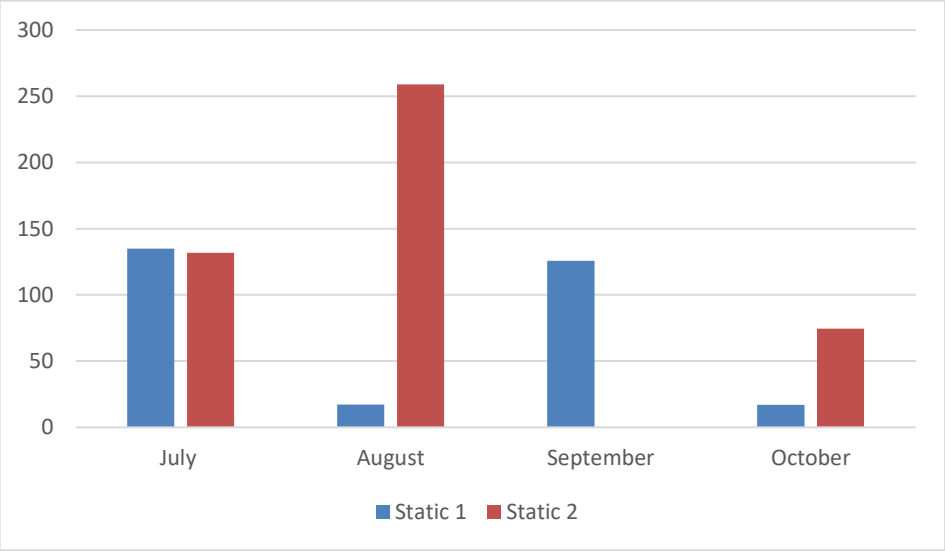
4.7 As shown in Figure 4.1 bat activity on site occurred throughout the survey season. Monthly comparisons between pass rates at each static can be made, Static 2 recorded the greatest number of passes per night in August with an average of 259 bat passes, whilst Static 1 recorded fewest passes per night in October, with an average of only 16.8 bat passes per night.

4.8 Due to a recording malfunction no bats were recorded by Static 2 in September.

4.9 Figure 4.1 shows only a slight overall increase in bat activity from July (average of 266.7 passes per night across the site) to August (276.2 passes per night across the site). There was then a significant decrease from August to October (91.2 passes per night across the site), this is a relatively predictable pattern given how bats alter their use of the landscape throughout the year.

4.10 Overall, the data collected by these four statics indicate moderate levels of bat activity on site.

Total bat passes per static per month



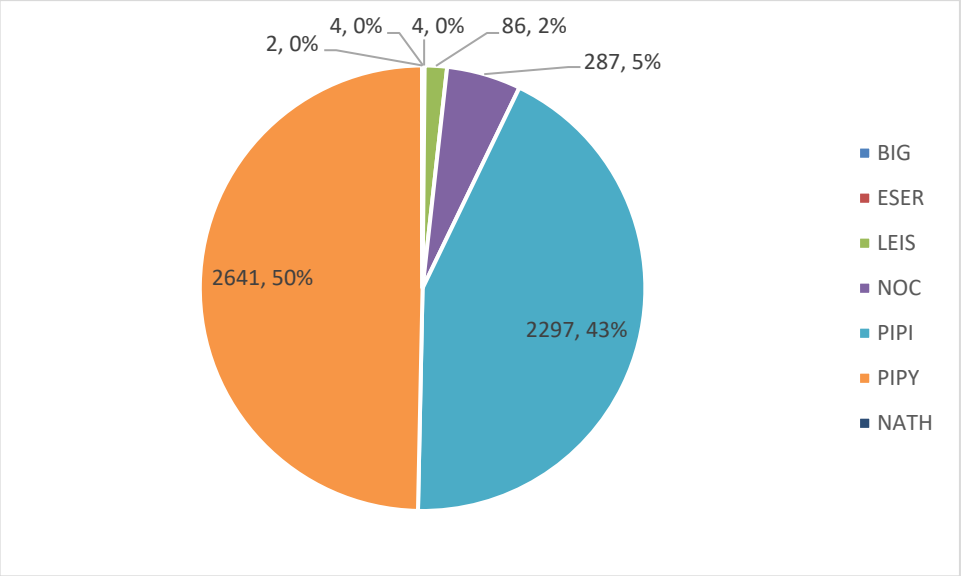
Species Diversity and Composition

4.1 A total of six bat species/species groups were recorded by both statics during the sampling period, see Figure 4.2 below with the greatest proportion of activity recorded on site was from pipistrelle species (95%). Nathusius pipistrelle and serotine bats were recorded the least throughout the sampling period, making up only less than 1% of species.

4.2 Given pipistrelles are the most common bat species in the UK with their national population trending upwards progressively over recent years, this species composition is not unexpected.

4.3 Noctules were the third most abundant species recorded on the site with 5% and 287 passes, this would be expected given the wooded nature of the site and railway embankments, and that noctules are associated with woodland.

Species diversity and composition across the site



Walked Transects

4.4 The walked transects were undertaken on:

- 27th July 2021;
- 24th August 2021;
- 16th September 2021; and
- 13th October 2021.

4.5 The transects identified moderate levels of bat activity on site. Again, this was mainly from pipistrelle species with the occasional noctule also being recorded.

4.6 Foraging and commuting activity from both soprano and common pipistrelles were predominantly associated with the viaduct through the centre of the site (stops 2, 3 and 4). These are shown in Figure 1 in Appendix 1.

4.7 The highest levels of activity were identified earlier in the evening and reducing later in the evening. This trend was seen across all of the activity transects.

4.8 Given that the results collected from the statics and the walked transects show a relatively small range of species using the site for commuting, foraging, and potentially roosting, the population of bats on site are considered to be of **local** value only.

Incidental Findings

4.9 A potential bat emergence from a roost was observed during the July transect from the southern end of the viaduct, with the bat seen emerging high up on the viaduct; where some missing mortar was present within the brickwork. This emergence was seen at 20:58, 16 minutes after sunset.

BAT EMERGENCE/RE-ENTRY SURVEY

4.10 The emergence surveys were undertaken on:

- 26th August 2021 dusk (B1);
- 27th August 2021 dawn (B2 & B3); and
- 17th September 2021 dawn (B1).

4.11 Two Soprano pipistrelle was seen emerging from B1. These emergences were recorded at 20:42 on the 26th August, 41 minutes after sunset. Both of the bats were seen emerging from the ceiling of one of the arches of the viaduct. The roost locations can be seen on Figure 2 in Appendix 1.

4.12 A single soprano pipistrelle re-entry was seen at the northern end of B1. This re-entry was seen at 06:21 on 17th September, 17 minutes before dawn. The bat was seen foraging close to the viaduct and then re-entered behind some dense ivy that was covering a portion of the south façade of the viaduct.

4.13 A potential bat emergence was seen during the July transect, this was at the southern end of the viaduct, the bat was seen emerging high up on the viaduct, from where some missing mortar was present within the brickwork. This emergence was seen at 20:58, 16 minutes after sunset.

4.14 No other roosts within the viaduct or in Buildings 2 and 3 were identified during the surveys.

4.15 The results of the emergence/re-entry surveys confirmed that bats were roosting within B1 and a total of two roosts were identified within the viaduct.

4.16 Given the time of year the roosts were identified, the activity around the viaduct and the number of bats seen to emerge from each feature, these roosts are considered to be summer/day roosts of **local** value only.

BADGER SETT MONITORING

4.17 No badger activity was recorded on the trail/surveillance camera at the potential badger sett during the four week survey period (16th September – 13th October).

4.18 No badgers were caught on the camera, although fox (*Vulpes vulpes*), wood mouse (*Apodemus sylvaticus*), brown rat (*Rattus norvegicus)* and domestic cat (*Felis catus*) were caught on several occasions within the vicinity of the camera trap. A single fox was seen appearing to use the hole, or passed within close proximity of the entrance.

4.19 The location of the trail cam is shown on Figure 3 within Appendix 1.

4.20 Given the findings of the survey it is considered that badgers are **likely absent** from the hole and therefore they are not considered further in this report.

STAG BEETLE SURVEY

4.21 No stag beetles were recorded during the walked transect on 27th July 2021.

4.22 However, during the August bat transect on 24th August 2021, a single female stag beetle was identified moving close to some fallen branches and at the western end of site.

4.23 The location of the stag beetle is shown on Figure 4 in Appendix 1.

4.24 Given the incidental finding on the site, stag beetle is confirmed as being present on site. Although stag beetle are in decline across their species range, London and in particular south London are hotspots for populations. However, the site is generally unsuitable for stag beetle given the dominance by scrub and young woodland. Given the location in south London and high number of records from the local area the population on site is considered to be of **local** value.

HEDGEHOG

4.25 A total of 92 records of hedgehog were provided by GIGL within 2km of the site, the closest of being 256m south east of the site.

4.26 The woodland and scrub habitat on site provided foraging and hibernation habitat for hedgehogs. Given the number of records in close proximity to the site and the habitats present, the potential population on site is considered to be of **local** value.

5.0 IMPACT ASSESSEMENT

5.1 This section of the report addresses the potential impacts of the development on each of the ecological receptors in the absence of mitigation, compensation nor enhancement based on their value as assessed above.

5.2 Although not surveyed for, hedgehog is also considered within this section of the report, given the sites suitability to support this species.

5.3 The following sections of this report therefore considers, the impacts and any required mitigation measures for the following ecological receptors:

- Foraging and commuting bats;
- Roosting bats;
- Stag beetle; and
- Hedgehog.

FORAGING AND COMMUTING BATS

Construction Phase

5.4 The majority of the trees and scrub within the centre of the site will be removed for development, although existing vegetation will be retained where possible. This includes 12m depth boundaries at each end of the proposed development area and a minimum of 8m along the remaining length. The boundary will include 8-12 m vegetative buffer along the railway to maintain connectivity of the site for commuting bats.

5.5 As well as the importance for connectivity, the scrub and trees on site that will be removed for the proposed development have a value for foraging bats, and their loss will impact the foraging resource and food availability for bats on site.

5.6 During construction high levels of lighting, that could disrupt bats flight paths and foraging activity around the site, although construction will not occur during night time hours.

5.7 In the absence of mitigation, the potential impact on foraging and commuting bats, during the construction stage is likely to be a **significant permanent negative impact** at the **local** scale due to the loss of foraging. Some of this impact will be **temporary** in nature until the biodiversity strategy is in place.

Operational Phase

5.8 Newly implemented lighting could impact the flight paths of bats on site during the operational phase of the development. However, the lighting will follow best practice with low level and directional lighting to prevent light spill. The 8m vegetative boundary

that forms part of the proposals will further keep the lighting within the site. The survey show the species recorded are urban specialists and typical of those found in cities and built up areas.

5.9 The integration of the biodiversity strategy, to include foraging resource for bats will provide insect prey for foraging bats. This strategy integrates shrub and herbaceous species from the Royal Horticultural Society (RHS) Good for Pollinators Guide. These species will provide a nectar resource for pollinator species all year round, which in turn will provide a foraging resource for bats. A pond will be established post development, which will diversify the habitat provision on site post development, located within least 10m of the retained woodland habitats.

5.10 Extensive biodiverse roof will be included on the flat roofs on top of the new buildings. In accordance with best practice these living roofs will be substrate based, plug planted and seeded with a wildflower mix, such as the Emorsgate wildflower mix for green roofs which includes 20 wildflower species. This will provide a foraging resource for bats.

5.11 The trees to be planted will be predominantly native species, and will be planted mostly along streets, where they will provide a corridor into the existing and newly created green habitats on site, creating a continuous canopy which is of use to a range of species including nesting birds and foraging and commuting bats.

5.12 The woodland will be enhanced; the invasive species will be removed sensitively, and the understory and ground flora planting will be enhanced using native planting and seeding to create structure and levels within the woodland. Additional deadwood will be provided, and the woodland will be managed to retain any newly fallen deadwood.

5.13 Whilst the biodiversity strategy will inform the design, layout and operation of the proposed site, the current stage of proposals are to be fixed and agreed once the site is allocated. As such these are considered to be mitigation measures, rather than embedded into the scheme at this stage.

5.14 Therefore, in the absence of mitigation, the potential impact on foraging and commuting bats during the operational stage is likely to be a **significant permanent negative impact** at the **local** scale.

ROOSTING BATS

Construction Phase

5.15 The construction phase of the development will result in the loss of part of the viaduct, that was confirmed supporting a soprano pipistrelle bat roost, within the ceiling of the archways and external walls of the viaduct.

5.16 In the absence of mitigation, the potential impact on roosting bats during the construction stage is likely to be a **significant permanent negative impact** at the **local** scale.

Operational Phase

5.17 Part of the viaduct is to be retained within the development. This could support further roosting bats. The new lighting proposals, if not designed in accordance with the guidance from the BCT and ILP, may stand to impact or disrupt roosting bats.

5.18 In the absence of lighting mitigation, the potential impact on roosting bats during the operational stage is likely to be a **significant permanent negative impact** at the **local** scale.

STAG BEETLE

Construction Phase

5.19 The area of site where the female stag beetle was recorded is due to also be lost to the new development and without compensation, the habitat availability for stag beetle would be significantly reduced during and following the construction phase.

5.20 In the absence of mitigation, the potential impact on stag beetle during the construction phase of the development is likely to be a **significant permanent negative impact** at the **local** scale**.**

Operational Phase

5.21 Impacts on stag beetle during the operational phase of the development is considered to be **negligible** as suitable habitat will all be cleared during the construction phase or will remain within the wider SINC following the construction phase.

HEDGEHOG

Construction phase

5.22 The scrub habitat, garden waste piles and piles of dead wood on site have the potential to support both foraging and hibernating hedgehog, and other small mammal species.

5.23 The removal of these habitats without due consideration could therefore result in the injury or death of individuals.

5.24 In the absence of mitigation, the potential impact on hedgehogs and other small mammals during the construction phase of the development is likely to be **a significant permanent negative impact** at the **local scale**.

Operational Phase

Impacts on hedgehog and other small mammal during the operational phase of the development are considered to be **negligible.**

6.0 MITIGATION, COMPENSATION AND ENHANCEMENTS

6.1 The order that the mitigation hierarchy is applied is to avoid impacts, then mitigate, then compensate negative ecological impacts and effects, in line with the CIEEM 2018 EcIA guidelines (CIEEM, 2018)[4].

6.2 Given the vegetation coverage on site, the finalised design will remove this as part of the proposed development. The level of development has been determined as the viable level to deliver the number of houses meet relevant design standards and addresses local housing needs. The scheme presents compensation and enhancements that go beyond the minimum requirements, to ensure the proposed development improves the condition of the site for the receptor species wherever possible.

6.3 The below summarises the necessary approaches to mitigation, compensation and enhancement. These should also be described in greater detail within an Ecological Management Plan (EMP), which could be secured through planning condition.

FORAGING AND COMMUTING BATS

Construction phase

6.4 As the majority of the key foraging and commuting habitat, the woodland and scrub, is to be lost during the construction of the development, and construction works may also stand to temporarily disrupt the local bat population. Mitigation and compensation are required as follows:

- Construction lighting on site should be designed in line with BCT and ILP guidelines[6]; and
- As compensation for the loss of the scrub and trees, a foraging resource for the bats on site, extensive landscaping should be delivered on site and should be designed in consultation with the project ecologist to ensure a high value for ecology. Proposed landscaping will include new hedgerows, shrub, scrub and tree planting. The species mix will be concentrated on native species and those with a known ecological value which will attract a varied invertebrate population, and in turn an important food source for bats.

6.5 Detailed mitigation, compensation and enhancement should also be provided in a stand-alone EMP.

Operational phase

6.6 During the operational phase, mitigation is required to ensure that foraging and commuting bats are not impacted on by the new lighting regime on site. Operational Lighting should follow guidance set out by the BCT and ILP[6] and include:

- Directional lighting pointing away from retained and new green infrastructure;

- No uncontrolled lighting should occur and light spill should be minimised;
- External lights should be subject to curfew controls where possible with lights on movement sensors to reduce light pollution when not needed;
- Use of low-UV warm-white LED bulbs; and
- Measures should be taken in internal light placement to reduce risk of light spill from windows.

6.7 Lighting at site should be modelled to confirm predicted intensity and spill and will be restricted to daylight hours only.

6.8 The 8m vegetative boundary that forms part of the proposals will further keep the lighting within the site. The integration of the biodiversity strategy, to include foraging resource for bats will provide insect prey for foraging bats. This strategy integrates shrub and herbaceous species from the Royal Horticultural Society (RHS) Good for Pollinators Guide. These species will provide a nectar resource for pollinator species all year round, which in turn will provide a foraging resource for bats. A pond will be established post development, which will diversify the habitat provision on site post development, located within least 10m of the retained woodland habitats.

6.9 Extensive biodiverse roof will be included on the flat roofs on top of the new buildings. In accordance with best practice these living roofs will be substrate based, plug planted and seeded with a wildflower mix, such as the Emorsgate wildflower mix for green roofs which includes 20 wildflower species. This will provide a foraging resource for bats.

6.10 The trees to be planted will be predominantly native species, and will be planted mostly along streets, where they will provide a corridor into the existing and newly created green habitats on site, creating a continuous canopy which is of use to a range of species including nesting birds and foraging and commuting bats.

6.11 The woodland will be enhanced; the invasive species will be removed sensitively, and the understory and ground flora planting will be enhanced using native planting and seeding to create structure and levels within the woodland. Additional deadwood will be provided, and the woodland will be managed to retain any newly fallen deadwood.

ROOSTING BATS

Construction phase

6.12 The development proposals include the partial demolition of the existing viaduct, including all or part of the identified roosts.

6.13 All UK bat species are protected by UK legislation (see full context at Appendix 3), under which it is an offence to:

- Deliberately capture, injure or kill a bat;

- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the same time); and intentionally or recklessly obstruct access to a bat roost.

6.14 A European Protected Species Mitigation (EPSM) or Bat Low Impact Class (BLIC) licence from Natural England is required to undertake works that would otherwise result in an offence.

6.15 A bat licence will therefore be required in this instance given the proposed destruction of the roost.

6.16 Mitigation action, secured through this licence to minimise the direct impact upon individual bats with compensatory roost space, compensatory foraging resources and a sensitive lighting scheme, will ensure the conservation status of bats at the site is not impacted.

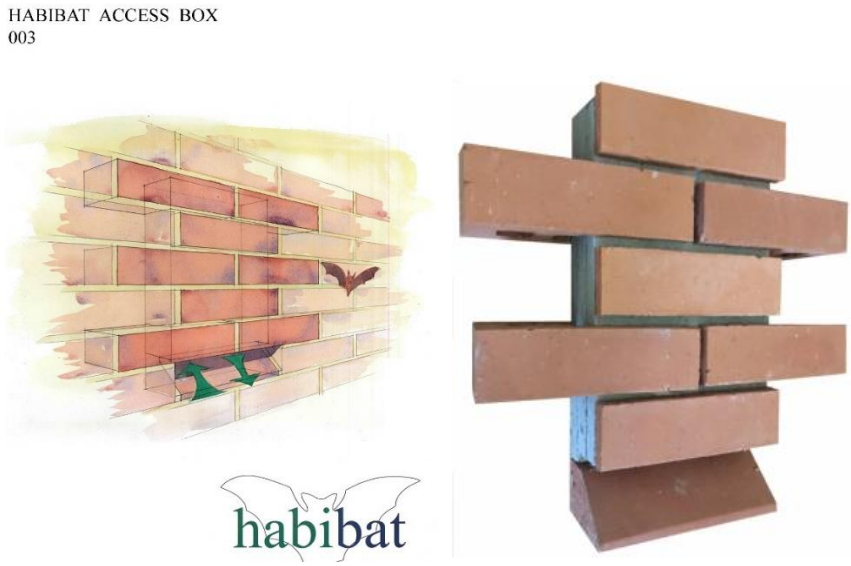
Operational phase

6.17 Due to the loss of bat roosts, compensatory bat boxes and features would be incorporated within the new buildings.

6.18 Bat boxes should be incorporated into the fabric of all new buildings. These should mirror the specifications of the existing roost as far as possible, being of a similar height, on the same elevation. Although, given the abundance of opportunities in the new buildings, a variety of conditions should be allowed for providing options for bats.

6.19 The figure below gives examples of bat boxes and bat tiles that can be seamlessly incorporated into the design of the new building.

Figure 6.1 Figure 7. Habibat bat boxes



STAG BEETLE

Construction phase

6.20 As stag beetle have been recorded on site measures should be put in place to maintain as much suitable habitat as possible and to ensure that individuals are not killed during site clearance. Measures should include:

- Retain as much deadwood on site as possible, if the retention on site is not possible then deadwood should be moved carefully to the area of the SINC that is to be retained;
- A Suitably Qualified Ecologist (SQE) should be present on site when any area of deadwood is to be removed so that any stag beetle or their larvae can be moved safely to areas of suitable retained habitat;
- Log piles and buried wood/stumps should not be cleared between mid-May and August inclusively. This is the period when adults emerge from the soil beneath logs or stumps. Larvae can take up to six years to pupate underground and so, if present, are almost impossible to avoid during site clearance works.

Operational phase

6.21 During the operational phase of development, enhancement measures that would enhance the retained habitat and provide new high quality areas of habitat for stag beetles should be provided. Measures should include:

- Where possible enhancements to the quality of retained habitat should be undertaken, this would include the provision of specific log piles and pyramids for stag beetle; and
- Any proposed landscaping in the development should include deadwood piles to compensate for the loss of suitable stag beetle habitat.

HEDGEHOG

Construction phase

6.22 Measures to protect hedgehogs or other small mammals from death or injury during the site clearance works are required.

6.23 In order to minimise the potential for killing or injuring of hedgehogs (and other small to medium sized mammals) during site clearance, removal of dense scrub vegetation should be undertaken by cutting to 30cm in the first instance. The vegetation should then be checked for hedgehogs before clearing to ground level. Should any hedgehogs be found, they should be moved to a suitable area of habitat that is not subject to clearance.

6.24 As well as the sensitive clearance, any log piles or garden waste piles should be removed by hand to allow any hedgehog that may be found to be moved to a suitable area of retained habitat.

Operational phase

6.25 As some of the habitats of suitability for hedgehog will be retained and enhanced within the wider SINC, compensation for the loss of the scrub and log/garden waste piles on will be provided in the retained areas. Proposed landscaping within the development area should also provide areas of habitat suitable for hedgehog.

7.0 RESIDUAL IMPACTS

7.1 In this section of the report, the residual impacts on each of the receptors will be predicted in light of the required mitigation and compensation measures discussed in section 6 of this report.

FORGAING AND COMMUTING BATS

Construction Phase

7.2 Upon successful implementation of the mitigation, compensation and enhancement measures, the development is considered to have a **neutral impact** during the construction phase.

Operational Phase

7.3 Upon successful implementation of the mitigation, compensation and enhancement measures, the development is considered to have a **significant permanent positive impact** on foraging and commuting bats at a **local** scale during the operational phase.

ROOSTING BATS

Construction Phase

7.4 Upon successful implementation of the mitigation, compensation and enhancement measures, the development is considered to have a **neutral impact** during the construction phase.

Operational Phase

7.5 Upon successful implementation of the mitigation, compensation and enhancement measures, the development is considered to have a **neutral impact** during the operational phase.

STAG BEETLE

Construction Phase

7.6 Upon successful implementation of the mitigation, compensation and enhancement measures, the development is considered to have a **neutral impact** during the construction phase.

Operational Phase

7.7 Upon successful implementation of the mitigation, compensation and enhancement measures, the development is considered to have a **significant permanent positive impact** on stag beetle **within the site boundary and zone of influence** during the operational phase.

HEDGEHOG

Construction Phase

7.8 Upon successful implementation of the mitigation measures and enhancement actions, the development is considered to have **neutral impact** on any hedgehog or other small mammal using the site during the construction phase.

Operational Phase

7.9 Upon successful implementation of the mitigation measures enhancement actions, the development is considered to have **neutral impact** on any hedgehog, or other small mammal, using the site during the operational phase.

8.0 SUMMARY AND CONCLUSIONS

8.1 Greengage Environmental Ltd was commissioned by Northpoint Property to undertake a suite of protected species surveys at a site known as Fawe Park Road, Putney, London Borough of Wandsworth.

8.2 The site sits within a Site of Importance for Nature Conservation (SINC) of Borough Grade II importance within Wandsworth, designated for its role as a wildlife corridor.

8.3 The surveys undertaken identified the following:

- Moderate levels of foraging and commuting activity associated with six species/group of species of bats across July, August, September and October;
- Two summer transitional/day soprano pipistrelle bat roosts within Building 1;
- Stag beetle identified in the west of the site; and
- Badger was not identified during the trail/surveillance camera surveys either passing the entrance or using the entrance. Foxes were recorded using the path next to the entrance and one individual was identified as potentially utilising the hole.

8.4 Although not surveys for, hedgehog, and other small mammal species are also discussed within this report.

8.5 In light of the survey findings an assessment of potential impacts, and necessary mitigation actions has been made within Section 6 of this report.

8.6 Compensation and enhancement actions have also been described in order to fully mitigate and compensate for the impacts of the development on each of the identified ecological receptors, including hedgehog.

8.7 The residual impacts of the development of each of the receptors is then predicted, in light of these mitigation and compensation actions, within section 7 of this report.

8.8 An EMP should be produced to further detail the required mitigation measures and on the site enhancements and their long-term management requirements. This can be secured via planning condition.

8.9 Upon successful implementation of all mitigation compensation and enhancement measures, the development proposals are considered to result in either neutral or positive impacts on each of the specified ecological receptors during both the construction and operational phase of the development, and proposals are considered to be in full compliance with legislation and policy surrounding the protection of protected species and green infrastructure. Furthermore, the function of the SINC as a wildlife corridor will be maintained.

FIGURE 1 LANDSCAPING PROPSALS

APPENDIX 1 SURVEY MAPS

APPENDIX 2 AUXILLARY BAT TRANSECT SURVEY DATA

Date: 27/07/2021	**Weather: 21°C, overcast and still**	**Start time: 20:42** **End time: 22:42**
Transect: July		
Surveyors: Sam Barker & Dan Perlaki		
Survey Results		

Time	**Listening Post**	**Species**	**Activity**	**Notes**
20:58	2	Common pipistrelle	Emergence	Potential emergence from the railway side of the bridge
21:05	4	Soprano pipistrelle	Commuting	Along inside channel of rail line
21:14	5	Common pipistrelle	Foraging	Foraging inside rail channel.
21:19 – 21:23	6	Common pipistrelle & soprano pipistrelle	Foraging	1x soprano and 2x common pipistrelles foraging in woodland under canopy and above bramble east of post.
21:23 – 21:29	7	Soprano pipistrelle	Foraging	Foraging in clearing
21:31 – 21:36	9	Soprano pipistrelle	Foraging	2x soprano foraging along cleared path
21:38	Between 9 and 10	Soprano pipistrelle	Foraging	Foraging between 9-10
21:40	10	Soprano pipistrelle	Unknown	Heard not seen
21:51	1	No bats	N/A	N/A
21:57	2	No bats	N/A	N/A
22:03	3	Soprano pipistrelle	Unknown	Heard not seen
22:12	4	No bats	N/A	N/A
22:19	5	No bats	N/A	N/A
22:27	6	No bats	N/A	N/A
22:34	7	Common pipistrelle	Unknown	Heard not seen
22:43	8	No bats	N/A	N/A

Date: 24/08/2021	**Weather: 19°C, overcast and light breeze**	**Start time: 20:06** **End time: 22:06**
Transect: August		
Surveyors: Dan Perlaki		
Survey Results		

Time	**Listening Post**	**Species**	**Activity**	**Notes**
20:18 – 20:20	2	Soprano pipistrelle	Foraging	2x soprano pipistrelle foraging along top of viaduct.
20:21 – 20:26	3	Soprano pipistrelle	Foraging	Foraging under arches
20:29, 20:30 & 20:32	4	Soprano pipistrelle	Foraging	Heard not seen foraging other side of rail line
20:39	5	Soprano pipistrelle	Unknown	Heard not seen
20:47 & 20:49	6	Common pipistrelle	Unknown	Heard not seen
20:56 - 20:57	7	Common pipistrelle & soprano pipistrelle	Unknown	Heard not seen
N/A	8	No bats	N/A	N/A
21:16 & 21:18	9	Common pipistrelle & Soprano pipistrelle	Unknown	Heard not seen
21:22	10	Soprano pipistrelle	Unknown	Heard not seen
N/A	1	No bats	N/A	N/A
21:38	2	Soprano pipistrelle	Unknown	Heard not seen
21:43 & 21:44	3	Common pipistrelle	Unknown	Heard not seen
N/A	4	No bats	N/A	N/A
N/A	5	No bats	N/A	N/A

Date: 16/09/2021	**Weather: 21°C, clear and light breeze**	**Start time: 18:59** **End time: 21:14**
Transect: September		
Surveyors: Dan Perlaki & Molly Crookshank		
Survey Results		

Time	**Listening Post**	**Species**	**Activity**	**Notes**
19:31 & 19:37	10	Soprano pipistrelle	Unknown	Heard not seen
19:42 & 19:45	9	Soprano pipistrelle and common pipistrelle	Foraging	Foraging over clearing
19:48	9-8	Common pipistrelle	Foraging	Foraging along top of viaduct
19:50-19:54	8	Soprano pipistrelle and common pipistrelle	Unknown	Heard not seen
19:56	8-7	Common pipistrelle	Unknown	Heard not seen
20:58-20:03	7	soprano pipistrelle and common pipistrelle	Foraging	Two soprano pipistrelle bats seen foraging over clearing.
20:42	2	Common pipistrelle	Unknown	Heard not seen

Date: 13/10/2021	**Weather: 15°C, overcast and light breeze**	**Start time: 17:51** **End time: 20:12**
Transect: October		
Surveyors: Sam Barker & Emma Carter		
Survey Results		

Time	**Listening Post**	**Species**	**Activity**	**Notes**
17:55	10	No bats	N/A	N/A
18:05	9	No bats	N/A	N/A
18:11	8	No bats	N/A	N/A
18:21 – 18:27	7	Soprano pipistrelle	Foraging and commuting	3 x bats seen foraging and commuting

				above dense scrub
18:28	6	No bats	N/A	N/A
18:37	5	No bats	N/A	N/A
18:46	4	No bats	N/A	N/A
18:52	3	No bats	N/A	N/A
18:59	2	No bats	N/A	N/A
19:07	1	No bats	N/A	N/A
19:15	10	Soprano pipistrelle and common pipistrelle	Unknown	Heard not seen
19:21 – 19:25	9	Common pipistrelle	Unknown	Heard not seen
19:31	8	Common pipistrelle	Unknown	Heard not seen
19:38	7	Common pipistrelle	Unknown	Heard not seen
19:43	6	No bats	N/A	N/A
19:47	5	No bats	N/A	N/A
19:53	4	No bats	N/A	N/A
19:58	3	Soprano pipistrelle	commuting	Commuting along the railway line
20:03	2	No bats	N/A	N/A
20:08	1	No bats	N/A	N/A

APPENDIX 3 RELEVANT LEGISLATION AND POLICY

LEGISLATION

Current key legislation relating to ecology includes the Wildlife and Countryside Act 1981 (as amended)[7]; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')[8], The Countryside and Rights of Way Act 2000 (CRoW Act)[9], and The Natural Environment and Rural Communities Act, 2006[10].

The Conservation of Habitats and Species Regulations 2017

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)[11], and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')[12], and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')[13] into UK law (in conjunction with the Wildlife and Countryside Act).

Regulation 43 and 47 respectively of the Conservation of Habitats & Species Regulations makes it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2 (European protected species of animals), or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5 (European protected species of plant). Development that would contravene the protection afforded to European protected species requires a derogation (in the form of a licence) from the provisions of the Habitats Directive.

Regulation 63 (1) states: 'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which —

> (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and
>
> (b) is not directly connected with or necessary to the management of that site;

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats[14] (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

The Countryside and Rights of Way Act 2000

The Wildlife and Countryside Act has been updated by the CRoW Act. The CRoW Act amends the law relating to nature conservation and protection of wildlife. In relation to

threatened species it strengthens the legal protection and adds the word 'reckless' to the offences of damaging, disturbing, or obstructing access to any structure or place a protected species uses for shelter or protection, and disturbing any protected species whilst it is occupying a structure or place it uses for shelter or protection.

The Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities Act 2006 states that every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Biodiversity Action Plans provide a framework for prioritising conservation actions for biodiversity.

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (*Erinaceus europaeus*), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan[15] (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework[16] (and Biodiversity 2020 strategy[17] in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020[18] and EU Biodiversity Strategy (EUBS)[19], this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

Biodiversity Action Plans

Non-statutory Biodiversity Action Plans (BAPs) have been prepared on a local and regional scale throughout the UK over the past 15 years. Such plans provide a mechanism for implementing the government's broad strategy for conserving and enhancing the most endangered ('priority') habitats and species in the UK for the next 20 years. As described above the UK BAP was succeeded in England by Biodiversity 2020 although the list of priority habitats and species remains valid as the list of *Species of Principal Importance for Nature Conservation*.

Regional and local BAPs are still valid however and continue to be updated and produced.

Detail on the relevant BAPs for this site are provided in the main text of this report.

Wild Mammals (Protection) Act 1996

All wild mammals are protected against intentional acts of cruelty under the above legislation.

This makes it an offence to:

- Mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

To avoid possible contravention, due care and attention should be taken when carrying out works (for example operations near burrows or nests) with the potential to affect any wild mammal in this way, regardless of whether they are legally protected through other conservation legislation or not.

Legislation Relating to Badger

The Protection of Badgers Act (1992) provides badgers with legislative protection in the UK. It makes it an offence to kill, injure or take a badger from the wild. It is also an offence under the act to intentionally or recklessly destroy, damage, interfere with or obstruct entrance to a sett without a relevant license from a statutory authority.

Legislation Relating to Nesting Birds

Nesting birds, with certain exceptions, are protected from intentional killing, destruction of nests and destruction/taking of eggs under the Wildlife and Countryside Act 1981 (as amended) and the CRoW Act. Any clearance of dense vegetation should therefore be undertaken outside of the nesting bird season, taken to run conservatively from March to August (inclusive), unless an ecologist confirms the absence of active nests prior to clearance.

Legislation Relating to Bats

All UK bats and their roosts are protected by law. Since the first legislation was introduced in 1981, which gave strong legal protection to all bat species and their roosts in England, Scotland and Wales, additional legislation and amendments have been implemented throughout the UK.

Six of the 18 British species of bat have Biodiversity Action Plans (BAPs) assigned to them, which highlights the importance of specific habitats to species, details of the threats they face and proposes measures to aid in the reduction of population declines.

Although habitats that are important for bats are not legally protected, care should be taken when dealing with the modification or development of an area if aspects of it are deemed important to bats such as flight corridors and foraging areas.

The Wildlife & Countryside Act 1981 (WCA) was the first legislation to provide protection for all bats and their roosts in England, Scotland and Wales (earlier legislation gave protection to horseshoe bats only.)

All eighteen British bat species are listed in Schedule 5 of the Wildlife and Countryside Act, 1981 and under Annexe IV of the Habitats Directive, 1992 as a European protected species. They are therefore fully protected under Section 9 of the 1981 Act and under Regulation 43 of the Conservation of Habitats and Species Regulations 2017, which transposes the Habitats Directive into UK law. Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;

- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; and
- Intentionally or recklessly obstruct access to a bat roost.

This legislation applies to all bat life stages.

The implications of the above in relation to the proposals are that where it is necessary during construction to remove trees, buildings or structures in which bats roost, it must first be determined that work is compulsory and if so, appropriate licenses must be obtained from Natural England.

Legislation Relating to Reptiles

All species of reptile native to the UK are protected to some degree under national and/or international legislation, which provides mechanisms to protect the species, their habitats and sites occupied by the species.

Sand lizards and smooth snakes are European protected species and are afforded full protection under Section 9 of the Wildlife and Countryside Act 1981 and Regulation 43 of the Conservation of Habitats and Species Regulations 2017. However, these species are rare and highly localised. Their occurrence is not considered as relevant in this instance, as the ranges and specialist habitats of these species do not occur at this site.

The remaining widespread species of native reptiles (adder, grass snake, slow worm and viviparous lizard) are protected under part of Section 9(1) and all of Section 9(5) of the Wildlife and Countryside Act 1981. They are protected against intentional killing and injury and against sale, transporting for sale etc. The habitat of these species is not protected. However, in terms of development, disturbing or destroying reptile habitat during the course of development activities while reptiles are present is likely to lead to an offence under the Wildlife and Countryside Act 1981. It is therefore important to identify the presence of these species within a potential development site. If any of these species are confirmed, all reasonable measures must then be taken to ensure the species are removed to avoid the threat of injury or death associated with development activities.

Each species of native reptile has specific habitat requirements but general shared features include a structurally diverse habitat that provides for shelter, basking, foraging and hibernating.

All reptiles are BAP species and as such are also of material consideration in the planning process due to the NPPF.

Legislation Relating to Dormice

Dormice are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Protection to the species is also afforded by Regulation 43 of the Conservation of Habitats and Species Regulations 2017, making the hazel dormouse a European Protected Species. These two pieces of legislation operate in parallel, although there are some small differences in scope and wording. Under the provisions of Section 9 of the Wildlife & Countryside Act, it is an offence to:

- Intentionally kill, injure or take a dormouse;
- Possess or control and live or dead specimen or anything derived from a dormouse (unless it can be shown to have been legally acquired);
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a dormouse; and
- Intentionally or recklessly disturb a dormouse while it is occupying a structure or place which it uses for that purpose.

Regulation 43 of the Conservation of Habitats and Species Regulations 2017 makes it an offence to:

- Deliberately capture or kill a dormouse;
- Deliberately disturb a dormouse;
- Damage or destroy a breeding site or resting place of a dormouse; and
- Keep transport, sell or exchange, or offer for sale or exchange a live or dead dormouse or any part of a dormouse.

Legislation Relating to Natura 2000 Sites and Habitats Directive Annex I/II Species

European Commission Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive'), and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive') form the cornerstones of nature conservation legislation across EU member states. Priority species requiring protection across Europe are listed in the Annexes of these Directives. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 and Offshore Marine Conservation Regulations, 2007 (as amended) transpose these directives into UK law and set the basis for the designations of protected sites (known as Natura 2000 sites; Special Areas of Conservation under the Habitat Directive and Special Areas of Protection under the Birds Directive) that are of importance for habitats, species or assemblages listed on the directive Annexes. In the UK Ramsar sites are also offered the same level of protection as SPAs and SACs however the qualifying species for the designation may differ; Ramsar sites being designated specifically as important wetland habitats.

Under article 6(3) of the Habitats Directive, where projects stand to have likely significant effect (in accordance with the European Court of Justice ruling of C-127/02 Waddenzee cockle fishing) upon the integrity of conservation objectives (i.e.

conservation status of the qualifying species or habitats) within the designated sites then the Competent Authority must undertake an Appropriate Assessment.

Legislation Relating to Invasive Plants

Section 14(1) of the Wildlife and Countryside Act 1981 makes it illegal to release or allow to escape into the wild any animal which is not ordinarily resident in Great Britain and is not a regular visitor to Great Britain in a wild state, or is listed in Schedule 9 to the Act. It is also illegal to plant or otherwise cause to grow in the wild any plant listed in Schedule 9 to the Act.

PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2019[20] sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: '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'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

Regional

The London Plan 2021

Green Infrastructure and Natural Environment

Policy G1 Green Infrastructure

A. London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green Infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.

B. Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.

C. Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:

1. Identify key green infrastructure assets, their function and their potential function.
2. Identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

Policy G5 Urban Greening

A. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

B. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential and a target score of 0.3 for predominately commercial development.

Policy G6 Biodiversity and Access to Nature

A. Sites of Importance for Nature Conservation (SINCs) should be protected.

B. Boroughs, in developing Development Plans, should:

1. Use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
2. Identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
3. Support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
4. Ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

C. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

1. Avoid damaging the significant ecological features of the site

2. Minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
3. Deliver off-site compensation of better biodiversity value.

D. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

E. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and Woodlands

A. Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Local

The Wandsworth Biodiversity Strategy

The Wandsworth Biodiversity Strategy sets out five key principles which will guide the priorities for borough-wide collaborative action at the landscape scale to protect and enhance biodiversity and to make nature accessible to all:

1. Better: Improving the quality of existing priority habitats and landscapes
2. Bigger: expanding the areas of priority habitats and landscapes
3. More: creating new areas of habitat or new landscapes
4. Joined-up: improving links and connectivity between habitats at the landscape scale
5. Promote: informing local individuals and communities about how they can understand and appreciate priority habitats and landscapes and crucially the role they have in delivering measures to nurture wildlife on their doorstep.

The strategy includes implementing measures that will ensure biodiversity research and evidence is kept up to date, that priority places, habitats and species are protected, well managed and enhanced and that overarching issues such as invasive non-native species, and biodiversity net gain are understood and necessary guidance is made available.

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Greengage

Fawe Park Road, Northport Property
Preliminary Ecological Appraisal, November 2021

QA

Fawe Park Road - Preliminary Ecology Appraisal

Issue/Revision:	Draft	Final
Date:	August 2021	November 2021
Comments:		
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CONTENTS

1.0 EXECUTIVE SUMMARY

1.1 Greengage Environmental Ltd was commissioned to undertake a Preliminary Ecological Appraisal (PEA) by Northport property of a site known as Fawe Park Road, within the London Borough of Wandsworth.

1.2 This document is an update of the Preliminary Ecological Appraisal (PEA) that The Ecology Consultancy undertook in 2016 (5182.1_Fawe Park Road_PEA_Report_Northport FPR Ltd_V1.0).

1.3 This document has been produced to support a submission to designate the site for housing as part of the Wandsworth local plan. The indicative designation would be to construct 78 residential units, ranging from 3 to 4 storey in height, also comprising landscaped areas, a new road with two turning points and off-street parking for the properties. The proposal is also for the demolition of two terraced properties in Fawe Park Road to create vehicle and pedestrian access to site.

1.4 This survey aimed to establish the ecological value of this site and the presence/likely absence of notable and/or legally protected species in order to inform appropriate mitigation, compensation and enhancement actions in light of the proposed development works.

1.5 An initial PEA was undertaken by The Ecology Consultancy in 2016. However, owing to the time lapsed between the original work, it was recommended that the PEA was updated in 2021 to record any changes in habitat composition or condition on site.

1.6 The survey area extends to approximately 1.5 hectares (ha) and comprises broad leaved woodland, dense scrub, buildings and scattered trees. The site is situated within Putney Embankment Site of Importance for Nature Conservation (SINC).

1.7 The site survey, alongside the desk study received from Greenspace Information for Greater London (GIGL) confirmed the site had potential to support a range of notable and protected species including:

- High Potential for common and widespread nesting birds;
- Moderate potential for foraging and commuting bats;
- Low and moderate potential to support roosting bats;
- High potential to support badgers;
- High potential to support hedgehog; and
- Low potential to support stag beetle.

1.8 The potential for the site to support all other protected and/or notable species was considered to be negligible owing to the confined nature of the site and surrounding land use.

1.9 Five invasive/non-native plant species were also identified during the site visit. Two of the species, Japenese knotweed (*Fallopia japonica)* and virginia creeper (*Parthenocissus quinquefolia)* are listed on schedule 9 of the Wildlife and Countryside Act (1981) (as amended). The other three species, snowberry (*Symphoricarpos albus)*, buddleja (*Buddleja davidii)* and green alkanet (*Pentaglottis sempevirens)* are listed by the London Invasive Species Initiative (LISI)[1].

1.10 Further surveys are currently underway to establish the value of the site for commuting, foraging and roosting bats, badgers and stag beetle.

1.11 Mitigation advice is detailed within this report for all other species of concern, namely nesting birds and hedgehog, as well as s guidance on the eradication of the invasive/non-native species.

1.12 Mitigation must also ensure that large areas of the existing habitat are retained as the site, which forms part of a designated SINC, is an important green and dark corridor for wildlife including bats, through an otherwise urban environment. These mitigation measures should also be summarised within a Construction Environment Management Plan (CEMP) for the site which should be secured by condition.

1.13 Recommended ecological enhancements are specified within section 5 of this report. These enhancements target UK and London Biodiversity Action Plan (BAP) species/habitats, to help enhance the qualitative biodiversity value of the site post-development.

1.14 These enhancements should aim to create a net gain in biodiversity value on site using the Defra Metric 3.0 Methodology, therefore, ensuring the development meets both national, regional and local standards in planning and biodiversity.

1.15 It is therefore recommended that the ecological enhancement measures, as well as the maintenance and monitoring to ensure the long-term success of the enhancements are detailed with an Ecological Management Plan (EMP), which could be secured through condition.

2.0 INTRODUCTION

2.1 Greengage was commissioned to undertake a Preliminary Ecological Appraisal (PEA) by Northport property of a site known as Fawe Park Road, within the London Borough of Wandsworth.

2.2 This document is an update of the Preliminary Ecological Appraisal (PEA) that The Ecology Consultancy undertook in 2016 (5182.1_Fawe Park Road_PEA_Report_Northport FPR Ltd_V1.0).

2.3 This document has been produced to support an submission to designate the site for housing as part of the Wandsworth local plan. The indicative designation would be to construct 78 residential units, ranging from 3 to 4 storey in height, also comprising landscaped areas, a new road with two turning points and off-street parking for the properties. The proposal is also for the demolition of two terraced properties in Fawe Park Road to create vehicle and pedestrian access to site.

2.4 This survey aimed to establish the ecological value of this site and the presence/likely-absence of notable and/or legally protected species in order to inform appropriate mitigation, compensation and enhancement actions in light of proposed development works.

SITE DESCRIPTION

2.5 The survey area extends to approximately 1.5 ha and is centred on National Grid Reference TQ 247 750.

2.6 The site forms part of the Putney Railway Cuttings, a borough grade II Site of Importance for Nature Conservation (SINC). Site of Importance for Nature Conservation (SINC). It is located within the London Borough of Wandsworth. Fawe Park Road boarders the northern boundary of the site and the main overground train line to Waterloo Station borders the southern boundary of the site. Residential housing dominates the wider surrounding land uses.

2.7 The site is well connected to the wider railway embankment of the east Putney railway cutting to the east. In the wider landscape Wandsworth Park and the River Thames are north of the site but there are no green corridors linking these to the site.

3.0 METHODOLOGY

3.1 The PEA (which included an Extended Ecological Phase 1 Survey) was undertaken in accordance with guidance in the Joint Nature Conservation Committee (JNCC) (2010) Handbook for Phase 1 Habitat Survey[1] and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal[2], in accordance with BS42020:2013: Biodiversity[3]. The overall assessment consisted of:

- Site specific biological information gained from a desktop review of available biological records; and
- A site walkover, protected species scoping assessment and phase 1 habitat survey.

3.2 The site-specific consultation provided the ecological context for the site survey carried out on the 12th July 2021.

3.3 The survey boundary and existing site is shown at Figure 1.

3.4 Greengage undertook the site walkover during sunny and mild conditions. Features within the site boundary and accessible features immediately bordering it were evaluated and the extent and distribution of habitats and plant communities were recorded and supplemented with target notes on areas or species requiring further commentary. Fauna using the area were recorded and areas of habitat suitable for statutorily protected species were identified where present, with an active search carried out for evidence of such use.

DESKTOP REVIEW

3.5 A review of readily available ecological information and other relevant environmental databases (included Defra's Multi-Agency Geographic Information for the Countryside (MAGIC) website[4]) was undertaken for the site and its vicinity. In addition, the National Biodiversity Network (NBN) online Gateway mapping tool[5], and a biological records search from Greenspace Information for Greater London (GIGL) were reviewed to identify the location and citations of local non-statutory designated sites and presence of records for notable and protected species. This provided the overall ecological context for the site, to better inform the Phase 1 Survey.

ON SITE SURVEYS

Flora

3.6 The extent and distribution of different habitats on site were identified and mapped according to the standard Phase 1 Survey methodologies, supplemented with target notes describing the dominant botanical species and any valuable or interesting features. A habitat map has been produced to illustrate the results, as shown at Figure 1.

Fauna

3.7 The Phase 1 Survey specifically included assessments to identify the potential value for notable, rare and protected species at site. This involved identifying potential habitats in terms of refugia, breeding sites and foraging areas in the context of species known to be present locally and regionally.

3.8 The likelihood of occurrence is ranked as follows:

- Negligible - While presence cannot be absolutely discounted, the site includes very limited or poor-quality habitat for a particular species. The site may also be outside the known national range for a species;
- Low - On-site habitat is poor to moderate quality for a given species, with few or no information about their presence from desk top study. However, presence cannot be discounted due to the national distribution of the species or the nature of on-site and surrounding habitats;
- Moderate - The on-site habitats are of moderate quality, providing most or all of the key requirements for a species. Several factors may limit the likelihood of occurrence, habitat severance, habitat disturbance and small habitat area;
- High - On-site habitat of high quality for given species. Site is within a regional or national stronghold for that particular species with good quality surroundings and good connectivity; and
- Present - Presence confirmed for the survey itself or recent, confirmed records from information gathered through desk top study.

3.9 The species surveyed for included:

Bat species (Chiroptera)

3.10 The site visit was undertaken in daylight and the evaluation of bat potential comprised an assessment of natural features on site that aimed to identify characteristics suitable for bat roosts, foraging and commuting. In accordance with Bat Conservation Trust survey guidelines[6] and methods given in English Nature's (now Natural England) *Bat Mitigation Guidelines*[7] consideration was given to:

- The availability of access to roosts for bats;
- The presence and suitability of crevices and other places as roosts; and
- Signs of bat activity or presence.

3.11 Definite signs of bat activity were taken to be:

- The bats themselves;
- Droppings;
- Grease marks;

- Scratch marks; and
- Urine spatter.

3.12 Signs of possible bat presence were taken to be:

- Stains; and
- Moth and butterfly wings.

3.13 Features with potential as roost sites include mature trees with holes, crevices or splits (the most utilised trees being oak, ash, beech, willow and Scots pine), caves, bridges, tunnels and buildings with cracks or crevices serving as entrance or exit holes.

3.14 Additionally, linear natural features such as tree lines, hedgerows and river corridors are often considered valuable for foraging and commuting. Consideration was given to the presence of these features both immediately within and adjacent to the assessment area.

Reptiles

3.15 The potential for reptile species on site was assessed during the walkover survey. Possible species include the grass snake (*Natrix natrix*), smooth snake (*Coronella austriaca*), adder (*Vipera berus*), common and sand lizard (*Lacerta vivipara* and *L. agilis*) and the slow worm (*Anguis fragilis*). These native reptile species generally require open areas with low, mixed-height vegetation, such as heathland, rough grassland, and open scrub or, in the case of grass snake, waterbody margins. Suitable well drained and frost free areas are needed so they can survive the winter.

Dormouse (Muscardinus avellanarius)

3.16 During the walkover survey the potential for dormouse to be present on site was assessed. This included observations for suitable habitat such as well-layered woodland, scrub and linking hedgerows, particularly those species offering suitable food sources such as honeysuckle and hazel, in addition to direct evidence such as characteristically gnawed hazelnuts, chewed ash keys and honeysuckle flowers, or nests.

Water vole (Arvicola terrestris)

3.17 Water vole potential was assessed during the walkover survey. The potential is identified by the presence of ditches, rivers, dykes and lakes with holes and runs along the banks. Latrines, footprints or piles of food can also be noted.

Otter (Lutra lutra)

3.18 Where desk-top review or consultation indicates the presence of otter in a river catchment, the presence of water bodies with good cover and potential holt (den) sites would be noted.

Birds

3.19 During the walkover survey, the potential for breeding birds was assessed. In particular, this includes areas of trees, scrub, heathland and wetlands that could support nests for common or notable birds.

Notable Invertebrates

3.20 As part of the walkover survey the quality of invertebrate habitat and the potential for notable invertebrate species was considered. There is a wide variety of habitats suitable for invertebrates including wetland areas, heathland, areas of bare sandy soil, ephemeral brownfield vegetation and meadows.

Biodiversity Action Plan priority species/ Species of Principal Importance

3.21 Where consultation and desk-study indicates the presence of BAP priority species (Species of Principal Importance) not protected by statute, effort was made to establish the potential for the site to support these species.

SURVEYORS

3.22 Jess Cole, who undertook the site survey and reviewed this report has a BSc degree in Ecology (Hons) and is a graduate member of CIEEM. Jess holds a Natural England Great Crested Newt Licence (2016-24975-CLS-CLS) and has over five years' experience in ecological survey and assessment

3.23 Daniel Perlaki, who also undertook the surveys at site, has an undergraduate degree in Ecology (BSc Hons), a Master's degree in Conservation Science and Policy and is a graduate member of CIEEM.

3.24 This report was written by Sam Barker, who has an undergraduate degree in Environmental Science (BSc Hons), is an Associate member of CIEEM with four years ecological surveying & assessment.

3.25 The report was written by Sam and reviewed and verified by Jess who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

CONSTRAINTS

3.26 The PEA was undertaken during an optimal time of year during ideal conditions by a suitably qualified ecologist.

3.27 The eastern half of the site was inaccessible due to the overgrown nature of the scrub. Two properties (Building 2 and 3) were privately owned and therefore access was not permitted. Instead, these buildings were assessed from the site and from Fawe Park Road.

3.28 These constraints are not thought to impact the conclusions drawn within this report; however, it is recommended that that further survey to assess the presence of badger is undertaken prior to any construction works, with particular attention given the area of land to the east which was inaccessible at the time of survey. no other species is considdered to be impacted by this constraint.

3.29 There are no other constraints to this ecological assessment.

4.0 RESULTS

DESK TOP REVIEW

Designations

4.1 Consultations with the GIGL and the Multi-Agency Geographic Information for the Countryside (MAGIC) dataset[8] have confirmed that there are no statutory designations of national or international importance within the boundary of the site.

4.2 There was one statutory designated site recorded within a 2km radius. This was Wimbledon Common Special Area of Conservation (SAC), this site is also designated as a Site of Special Scientific Interest (SSSI), the site was approximately 1.67km south west of the development site.

4.3 One further site of international importance, Richmond Park SAC was located within 5km of the development site. Richmond Park SAC was located approximately 3.28km west of site.

4.4 Records from GIGL also identified eight Sites of Importance for Nature Conservation within 2km of the site boundary. SINCs are recognised by the Greater London Authority and London borough councils as important wildlife sites.

4.5 The site forms part of the Putney Railway Cutting SINC, with a further three SINCs within 500m of the site. The description for these are shown in Table 4.1 below.

4.6 A further 15 SINCs were identified greater than 500m from the site. Given the distance and lack of suitable biodiversity corridors linking them to the site these are not discussed further.

4.7 There are three main tiers of sites:

- Sites of Metropolitan Importance;
- Sites of Borough Importance (borough I and II); and
- Sites of Local Importance.

4.8 Table 4.1 below gives the locations and descriptions of a selection of the nearest/most relevant local designations.

Table 4.1 List of most relevant Statutory and Non-Statutory Designated Sites within Search Radius

Site Name	Approximate Location	Description
Statutory Designations		
Wimbledon Common SAC & SSSI	1.67km south west	Wimbledon Common supports an extensive area of open, wet heath on acidic soil and also contains a variety of other acidic

Site Name	Approximate Location	Description
		heath and grassland communities. Semi-natural broadleaved woodland covers the deeper, clay soils of the western slope. A significant cover of heather distinguishes areas of dry and wet heath. The wet heath supports typical species such as the heath rush. Localised areas of dry heath support bell heather and dwarf gorse. The semi-natural woods of the clay soils comprise a dense canopy of maturing pedunculate oak and silver birch, with beech, hornbeam and aspen in parts. Holly *Ilex aquifolium* is the dominant understorey species. Wimbledon Common has a large number of old trees and much fallen decaying timber. The site supports a number of other scarce invertebrate species associated with decaying timber, including stag beetle.
Richmond Park SAC	3.28km west	The site is primarily important for the ancient trees and dead wood habitats that it supports, as well as the invertebrate assemblage and the areas of acid grassland. The site has been designated an SAC for the population of stag beetles that is supported on the site.
Non-Statutory		
River Thames and tidal tributaries - Site of Metropolitan importance.	322m north	The River Thames and the tidal sections of creeks and rivers which flow into it comprise a number of valuable habitats not found elsewhere in London. The mud-flats, shingle beach, inter-tidal vegetation, islands and river channel itself support many species from freshwater, estuarine and marine communities which are rare in London. The site is of particular importance for wildfowl and wading birds. The river walls, particularly in south and east London, also provide important feeding areas for the nationally rare and specially-protected black redstart.
Putney Railway Cutting - Borough Grade II importance	The site falls within this SINC	Much of it is a mix of native and non-native broadleaved woodland and rough land. There are frequent patches of regenerating elm scrub and bracken. Locally scarce plants such as great horsetail occur in places. Foxes are abundant, and the rail sides support important populations of birds, including the declining house sparrow. East of Putney station are extensive, deep and wide railway cuttings. Sycamore woodland is developing in places. Other areas support rough grassland.
East Putney Railway Cutting - Borough Grade II importance	270m south	The cutting south of East Putney station contains woodland of oak, silver birch and sycamore, patches of scrub, and more open areas with rough grassland and tall herbs.
Wandsworth Park - site is of Local importance	90m north	An attractive and well used formal park in an area deficient in accessible wildlife sites. Mature trees and dense shrubberies provide habitat for common birds, and the location beside the Thames attracts passing migrants in addition to the resident birds.

Biodiversity Action Plans

4.9 UK Biodiversity Action Plans (BAPs) have been developed which set priorities for nationally important habitats and species. To support the BAPs, Species/Habitat Statements (otherwise known as Species/Habitat Action Plans) were produced that provide an overview of the status of the species and set out the broad policies that can be developed to conserve them. A list of priority species of conservation importance was also developed.

4.10 The UK BAP was succeeded in 2012 by the *UK-Post 2012 Biodiversity Framework* which informed the creation of the *Biodiversity 2020* strategy; England's contribution towards the UK's commitments under the *United Nations Convention of Biological Diversity*.

4.11 Despite this, the UK BAP priority species lists and conservation objectives still remain valid through integration with local BAPs (which remain valid), and in the form of the Habitats and Species of Principle Importance list (as required under section 41 of the Natural Environment and Rural Communities (NERC) Act).

4.12 There were no UK priority habitats identified on site.

4.13 Local Biodiversity Action Plans (LBAPs) ensure that national action plans (the UK BAP/Biodiversity 2020) are translated into effective action at the local level and establish targets and actions for locally characteristic species and habitats.

4.14 Local Biodiversity Action Plans (LBAPs) ensure that national action plans (the UK BAP/Biodiversity 2020) are translated into effective action at the local level and establish targets and actions for locally characteristic species and habitats.

London BAP

4.15 The London BAP lists 214 priority species and eight Species Action Plans (SAPs), in addition to four priority habitats and 11 Habitat Action Plans (HPAs). There are also many species listed on the BAP which are priority species and are of conservation concern. Of these, the features relevant to this report include:

- Bats (SAP);
- Stag beetle (SAP);
- House sparrow (SAP);
- Private gardens (HAP);
- Woodland (HAP); and
- Built structures listed as a priority habitat.

Wandsworth Biodiversity Strategy (2021)

4.16 Since Wandsworth is a very urban borough, the habitats and species that are significant on a national scale, are often not present here. Following consultation with stakeholders,

it was decided that a dedicated BAP would be produced in 2022 and will be based on the principles of "bigger, better, more joined up and promote".

Species Record

4.17 The information provided in the biological data search from GIGL identified records of a number of protected and BAP priority species within 2km search radius of the site. Among others these include the following species of relevance to the site:

- Bird species included lesser redpoll (*Acanthis cabaret*), house sparrow (*Passer domesticus*), black redstart (*Phoenicurus ochruros*);
- Hedgehog (*Erinaceus europaeus);*
- Badger (*Meles meles);*
- Common toad (*Bufo bufo);*
- Bat species including serotine (*Eptesicus serotinus)*, daubenton's bat (*Myotis daubentonii),* lesser noctule (*Nyctalus leisleri),* noctule (*Nyctalus noctule)*, common pipistrelle (*Pipistrellus pipistrellus),* Nathusius' pipistrelle (*Pipistrellus nathusii*) and soprano pipistrelle (*Pipistrellus pygmaeus);* and
- Notable invertebrates including: stag beetle (*Lucanus cervus*), small heath (*Coenonympha pamphilus pamphilus*), wall butterfly (*Lasiommata megera*) and white admiral (*Limenitis camilla*).

Detailed Description of Site: Habitats

4.18 The habitats presented across the assessment site consist of the following Joint Nature Conservation Committee (JNCC) Phase 1 Habitat categories, as mapped at Figure 1:

- Broadleaved plantation woodland (A1.2)
- Dense continuous scrub (A2.1)
- Scattered trees (A3.1)
- Buildings (J3.6)

Broadleaved plantation woodland

4.19 The western and northern parts of the site were dominated by second growth woodland. The majority of the trees were semi-mature and young trees, saplings were growing through the understorey. Ash (*Fraxinus excelsior)*, Oak (*Quercus robur)* and sycamore (*Acer pseudoplatanus)* were the dominant tree species.

4.20 The ground flora was dominated by bramble and ivy (*Hedera helix)*. There were also several patches of non-native invasive species identified throughout the woodland including: snowberry (TN1), buddleia (*Buddleja sp.)* (TN2), virginia creeper

(*Parthenocissus quinquefolia*) (TN3), green alkanet (*Pentaglottis sempervirens*) (TN4) and Himalayan balsam (*Impatiens glanduliflera)* (TN5).

4.21 A large pile of dead wood was identified in the centre of the site (TN6).

Figure 4.1 Figure 1 The extent of the broadleaved woodland, that extended throughout the site.

Figure 4.2 Large pile of wood debris in the centre of the site.

Dense continuous scrub

4.22 The majority of the site was covered by dense bramble scrub, which was dominated by bramble (*Rubus fruticosus*) and nettle (*Urtica dioica*).

Figure 4.3 Dense scrub that covered large swathes of the site.

Scattered trees

4.23 Outside of the woodland areas there were four further scattered semi-mature trees. These a combination of ash and sycamore.

Buildings

4.24 Three buildings were identified on site and are described further below

4.25 Building 1 (disused railway bridge) - A 19th Century viaduct railway bridge crossed through the south-west of the site. The bridge was built from brick with several archways. The bridge had missing sections of brick work and buddleia growing through the loose mortar in places.

4.26 Building Two (52 Fawe Park Road) – a late 19th Century terraced building was present in the north of the site. The building was constructed from brick with a slate tiled roof. The back of the building had hanging roof tiles over a more modern extension to the upper floor. There were several loose tiles on the roof and some of the hanging roof tiles appeared to have small gaps behind them.

4.27 Building three (54 Fawe Park Road) - a late 19th Century terraced building was present in the north of the site. The building was constructed from brick with a slate tiled roof. The back of the building had hanging roof tiles over a more modern extension to the upper floor. There were several loose tiles on the roof and some of the hanging roof tiles appeared to have small gaps behind them.

Figure 4.4 Building 1, disused railway viaduct bridge

Figure 4.5 Existing north façade of building 2 & 3.

Figure 4.6 Existing south façade of building 2

Figure 4.7 Existing south façade of building 3.

Detailed description of Site: Protected Species Potential

Badger

4.28 Records from GiGL identified that badgers had previously been recorded within 2km of the site. The closest of these records being identified 1.13km south west of the site.

4.29 Four other entrances identified on site (TN8) given the small size of these holes and the overgrown nature of the vegetation around the entrances these were more likely to have been created by mammals other than badger such as fox, areas of bare ground under Building 1 had evidence of mammal snuffling activity (TN7), most likely associated with foxes.

4.30 A single entrance hole was identified in the south of the site (TN9), just outside of the developments red line boundary. This had a large D-shaped entrance leading to a single tunnel. Given the nature of the hole this was deemed to be currently active.

4.31 Taking all of the above into consideration, the site has been determined to provide **High** potential to support badgers and their setts.

Figure 4.8 A single entrance to a potential badger sett.

Bats

Foraging and commuting

4.32 Records from GIGL identified a total of seven bat species within 2km of the site.

4.33 The site is designated as a SINC, for its connectivity to the further railway cutting SINCs east and south of the site along the railway.

4.34 The woodland and railway embankment provide suitable linear habitat for foraging and commuting bats as a green corridor along the side of the railway and through an otherwise urban landscape. However, the urban setting immediately surrounding the site provides no links to the greenspaces present away from the railway line, in the wider landscape.

4.35 With all of the above taken into consideration, the site has been determined to provide **moderate** potential to support the commuting and foraging behaviour of bats.

Roosting

4.36 The buildings 1-3 and all the trees were assessed for their potential to support roosting bats.

4.37 The previous appraisal (5182.1_Fawe Park Road_PEA_Report_Northport FPR Ltd_V1.0) identified 16 trees as having low bat roosting potential. Greengage found an additional 9 trees with low roosting potential during their 2021 walkover. The locations of these

trees can be found within Figure 1. All trees were allocated this level of potential owing to dense ivy cover.

4.38 Building 1 was found to have **moderate** bat roosting potential, with Buildings 2 and 3 given **low** potential.

4.39 For the bridge given moderate roosting potential, the Potential Roost Features (PRFs) provided larger cavities which could support higher numbers of common bat species. features could include missing mortar, leading to cavities behind the brickwork or areas where buddleia had created openings between the bricks.

4.40 For all the buildings given low roosting potential these provided features with a small, crevice space suitable for small numbers of common crevice dwelling species, such as pipistrelles, which are known in the area. Examples of these features would be missing or loose roof tiles or gaps above windows.

Reptile

4.41 Records from GIGL identified no reptiles within 2km of the site.

4.42 A previous survey of the site for reptiles (5182.1_Fawe Park Road_PEA_Report_Northport FPR Ltd_V1.0) did not encounter any reptiles across the site.

4.43 During the walkover it was identified that the site had become more overgrown since the original 2016 surveys. The heavy shading from the woodland canopy and lack of basking areas meant that the site is no longer considered suitable for reptiles.

4.44 With all of the above taken into consideration, the site has been determined to have **negligible** potential to support reptiles.

4.45 Reptiles are therefore considered no further within this report.

Otter

4.46 Records provided from GiGL identified otter within 2km of the site.

4.47 Otters can travel up to 500m across open land to their holts. Given the urban nature of the surrounding area and the isolation from any minor tributaries and streams the site was deemed to have **negligible** potential to support otter.

4.48 Otters are therefore considered no further in this report.

Invertebrates

4.49 Records provided from GiGL identified several NERC Section 41 and UK BAP invertebrate species within 2km of the site including stag beetle recorded approximately 100m from the site, within the wider Putney Railway Cutting SINC boundary.

4.50 Given the woodland nature of the site, there was a significant amount of decaying wood across the site. Although decaying wood provides suitable habitat for saproxylic invertebrates such as the stag beetle. Stag beetles in particular prefer wood that is buried in the ground where the wood across the site was identified as being on the surface of the woodland floor.

4.51 With all of the above taken into consideration the site is deemed to have **moderate** potential to support protected and notable invertebrates.

Birds

4.52 Records provided from GIGL identified a variety of bird species within 2km of the site.

4.53 Given the woodland, buildings and scrub found across the site there is an abundance of opportunities for a variety of more common and widespread birds to use the site for nesting and foraging.

4.54 Overall, the site is deemed to have a **high** potential to support common and widespread birds.

Invasive/non-native species

4.55 During the Phase 1 habitat survey several invasive species were identified on site at the time of the walkover survey.

4.56 Three of these species snowberry (*Symphoricarpos albus)* (Target Note 2), buddleja (*Buddleja davidii)* (Target Note 1) and green alkanet (*Pentaglottis sempevirens)* (Target Note 4) are listed by the London Invasive Species Initiative (LISI)[1]. These species fall under categories 2, 3 and 6 respectively, with category 2 posing the greatest risk in this instance.

4.57 Category 2 species are those of high impact or concern present at specific sites that require attention (control, management, eradication etc). Such species are priority species for action in London and LISI encourages this wherever possible.

4.58 Japenese knotweed (*Fallopia japonica)* and virginia creeper (*Parthenocissus quinquefolia)* are listed on schedule 9 of the Wildlife and Countryside (Act 1981) (as amended) and its intentional spread in the wild is therefore considered illegal.

4.59 There is therefore **confirmed** presence of invasive species on site.

Other BAP Species

4.60 The woodland and scrub on site provided foraging and hibernation habitat for hedgehogs. Hedgehog is a NERC S41 species of principal importance.

4.61 The site is considered to have h**igh** potential to support hedgehog.

5.0 EVALUATION AND DISCUSSION

BASELINE SUMMARY

5.1 The assessment site and its surroundings have potential to support the following ecological receptors of note, which could therefore be impacted upon by any future prospective development proposals, as indicated in Table 5.1 below. Comment on further recommendations for each receptor is provided; further detail and discussion can be found at paragraph 5.2 onward:

Table 5.1 Baseline Summary

Receptor	Presence/Potential Presence	Comments
Designated Sites: Statutory	**Confirmed**	Wimbledon Common SAC and SSSI was located over 1km from the site boundary. As these designations lay over 1km from the site, the development is considered to have no impact on these sites during the construction phase. Given that the proposed development is small the slight increase in population would be too small to add any additional recreation pressure on Wimbledon Common.
Designated Sites: Non-Statutory	**Confirmed**	The proposed site comprises almost half of the Putney Railway Cutting, a borough grade II SINC. The Putney Railway Cutting comprises a number of habitats including scrub, secondary woodland, and semi-improved grassland. The SINC also provides an important wildlife corridor, linking various commons and major wildlife sites together. As the site is designated a borough grade II SINC, any development on the site should have no negative effect on the overall ecological value of the site and should aim to provide gains for biodiversity. As the development proposals seek to build on a SINC a detailed Ecological Management Plan should be produced to ensure that the site is enhanced for biodiversity during the operational phase of development. The landscape proposals have to retain and enhance large areas of the habitat on site as the SINC provides a green corridor through an urban landscape. Impacts such as dust deposition, vibration and noise pollution will also need to be carefully assessed and mitigation measures established prior to the commencement of any construction works on site. These measures should be detailed within a Construction Environment Management Plan (CEMP).

Receptor	Presence/Potential Presence	Comments
Badger	**Moderate**	The embankment and woodland provided suitable areas for badgers to build their setts and forage. One probable badger entrance was recorded during the walkover, therefore further survey effort is being undertaken to assess presence/likely absence. Details of the further survey can be found in paragraphs 5.10 to 5.15 below.
Foraging bats	**Moderate**	The presence of the woodland and scrub has been assessed as providing moderate potential to support foraging and commuting bats. In order to establish the levels of bat activity on site and understand which species of bats access the area, a suite of activity surveys are being undertaken on site. Further detail on these surveys can be found in the paragraphs below. Furthermore, in order to protect the value of the site high level mitigation recommendations around lighting design to prevent unnecessary spill of artificial lighting onto the darker areas of site where bats are more likely to be, have been included below.
Roosting bats	**Moderate**	All buildings and trees on site were assessed for their potential to support roosting bats. during this assessment the surveyor aimed to establish the presence of any PRFs. Building 1 was found to have moderate roosting potential. Buildings 2 and 3 were found to provide low bat roosting potential. As well as the buildings 25 trees were given low potential. In ordered to establish the presence/likely absence of roosting bats within the buildings further being undertaken in the form of emergence/re-entry surveys. Detail of these surveys can be found in paragraphs below. In accordance with Bat Conservation Trust (BCT) guidelines[6] further survey for low potential trees is not required. Instead, soft felling is recommended. See paragraph 5.9 below.
Invertebrates	**Moderate**	The site and habitats within the site was assessed for its potential to support notable and protected invertebrates.

Receptor	Presence/Potential Presence	Comments
		The areas of lying deadwood were identified as having the potential to support saprophytic invertebrates, most notably stag beetle. Further survey effort is being undertaken to identify whether stag beetle is present on site. Detail of this survey can be found in paragraphs 5.16 to 5.19 below.
Birds	**High**	Further survey in relation to nesting birds is not necessary. However, mitigation measures to ensure that no individuals or active nests are harmed through the site clearance is included within this report.
Invasive species	**Confirmed**	Further survey in relation to the invasive species found on site is not necessary. However, mitigation measures to ensure the spread of these species in the wild is included below.
Hedgehog	**High**	Further survey in relation to hedgehog is not necessary. However, mitigation measures to ensure that no individuals or active nests are harmed through the site clearance is included within this report.

DISCUSSION AND RECOMMENDATIONS

5.2 Discussion is provided below on the key ecological receptors that stand to be impacted/benefit from proposed works; high level commentary on appropriate mitigation, compensation and enhancement actions is also provided.

5.3 An Ecological Management Plan (EMP) and CEMP should be produced and implemented for the site providing greater detail on the below, which should be secured through planning condition in accordance with BS 42020: 2013 Biodiversity.

Bats

Foraging and commuting

5.1 As the habitats on site are considered to provide moderate potential for commuting and foraging bats, monthly activity surveys (April-September inclusively), consisting of a walked transect, accompanied by the deployment of two static bat detectors are being undertaken.

5.2 The surveys seek to get an understanding of how bats use the site at different stages of the year.

5.3 Two static bat detectors are being deployed for five nights per season to provide a broad overview of the activity levels and types of species using the site.

5.4 The format of these surveys follows BCT guidance[6].

5.5 The below bullet points provide high level recommendations for the design of wildlife friendly lighting on site, based on guidance provided by the Institute of Lighting Professionals (ILP)[9].

- Retain a suitable amount of the existing habitat to enable there to still be a darkened corridor for bats to utilise;
- Use of low-UV warm-white LED bulbs with directional, downward facing and shielded lights which point away from green features such as trees, particularly the trees with bat roosting potential, or areas of soft landscaping;
- External lights should be subject to curfew controls where possible with lights on movement sensors to reduce light pollution when not needed;

Roosting

5.6 As proposals seek to demolish buildings 2 and 3 and a small part of building 1, further surveys to establish the presence/likely absence of roosting bats in these buildings are being undertaken. These further surveys have taken the form of emergence/re-entry surveys, undertaken in accordance with BCT Good Practice Guidelines[6], carried out between May – August.

5.7 For building 2 and 3, with low potential, one survey is required and for building 1, with moderate potential, two surveys are required.

5.8 Mitigation and compensation requirements in relation to any roosting bat(s) in the buildings is to be fully determined following the completion of the recommended emergence/re-entry surveys.

5.9 For the low potential trees, if their removal is required to facilitate the development, this should be done via soft felling during September and October. Soft felling is a process by which the trees are felled in sections, with each section lowered slowly to the floor and then left on site for at least 24 hours to allow any bats present to escape. This methodology is in line with bat mitigation guidelines[7].

Badger

5.10 Badger setts and badgers occupying the setts are protected under the Protection of Badgers Act (1992), full details of which are provided in Appendix 1.

5.11 During the Phase 1 Habitat survey a potential badger sett was identified, to determine the presence or likely absence of badgers using the sett a month's worth of monitoring (four weeks) with a camera trap is being undertaken. Once a week the camera and its memory card is checked, and any footage that had been recorded analysed.

5.12 Badgers are active and can be surveyed for throughout the year but optimal times of year to survey for them is early spring or late autumn, when they are active but there is less vegetation to conceal sett entrances and other signs of activity.

5.13 If badgers are found to be using the sett then a Natural England mitigation licence would be needed if it was deemed that the proposed development would disturb or have an impact on any badgers occupying the sett.

5.14 The results of the recordings and any specific mitigation measures required, would be provided within the phase 2 survey report.

Invertebrates

Stag beetle

5.15 Stag beetles are legally protected from sale under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and classed as a priority species. Any development that may disturb or destroy habitat suitable for stag beetle, buried wood and logs, should be assessed by a Suitably Qualified Ecologist (SQE).

5.16 The eastern end of the Putney Railway Cutting SINC, has previously had stag beetles recorded on it. The site walkover noted that there was an abundance of dead and rotting wood debris within the woodland, however the majority of this was not buried and therefore reduced the likelihood of stag beetles or their larvae being present.

5.17 As a precaution a walked transect in July, half an hour before dusk, was undertaken in order to identify any stag beetles across the site.

5.18 The results of the transect and any specific mitigation measures required, are provided within the phase 2 survey report.

Birds

5.19 Birds and their nests are protected from being killed/injured/damaged/destroyed (Appendix 2) and it is therefore recommended that any clearance of trees, buildings or scrub on site is undertaken outside of the bird nesting season (usually taken to run from March to August inclusive). If clearance cannot be avoided within this period, it must only take place after a Suitably Qualified Ecologist has confirmed the absence of nesting birds.

5.20 To compensate for the loss in nesting bird habitat, landscaping proposals should include native tree and shrub planting, as well as include bird boxes hung from the retained trees. Compensatory planting should focus on the provision of winter berry producing species that could include holly, rowan and blackthorn, as well as species with dense shrubby growth (elder, hazel, dog rose and hawthorn) within which birds may construct nests. This will not only provide nesting opportunities, but also deliver a vital food resource for birds over the winter months.

Invasive species

5.21 It is important that these species are removed sensitively from the site during the clearance works and destroyed in such a way that prevents their spread. Clearance should follow guidance from LISI[10].

5.22 LISI also details actions to help prevent, control and, where feasible, eradicate invasive non-native species in London. The following steps should be taken before, during and after site clearance to help control this species:

- Identify areas where these species are present and assess the risk of and how they would be spread;
- Set up monitoring schemes on site; and
- Raise awareness of these species through notices on site to help prevent the spread.

Enhancement

5.23 In accordance with the National Planning Policy Framework and local policy drivers (Appendix 2) proposals should provide net gains in biodiversity site under the Defra Metric 3.0 methodology.

5.24 Green infrastructure is planned at a site wide level, considering wider ecological features and green corridors. The proposed green space should be multifunctional with high floral diversity and support native species where possible.

5.25 The following measures should be included into the landscape proposals:

- Retention of mature trees, woodlands and scrub on site;
- Use of plant (including trees and shrubs) species of value to wildlife and resilient to change;
- Use of invertebrate habitat features such as bee posts, habitat panels and stag beetle loggeries;
- Incorporation of bird and bat boxes to target UK and London BAP species (e.g. swift, house sparrow and black redstart), integrated into the new buildings.
- Inclusion of hedgehog fencing and nest boxes;
- Creation of green walls utilising trellises and climbing plants; and
- Provision of a biodiverse living roof on all flat roof buildings.

6.0 SUMMARY & CONCLUSION

6.1 Greengage was commissioned by Northport Property to undertake a PEA a site known as Fawe Park Road, within the London borough of Wandsworth, in order to establish the ecological value of this site and its potential to support notable and/or legally protected species.

6.2 The PEA identified value for a number of notable and protected species and habitats, including bats (foraging, commuting and roosting), nesting birds, badgers, hedgehog and stag beetle.

6.3 Further surveys to establish the presence/likely absence of bats in the buildings, surveys to identify the levels of bat activity on site, monitoring of a single entrance hole to a potential badger sett and to identify the presence of stag beetle are being undertaken.

6.4 The results of these surveys will be used to inform the need for additional mitigation and compensation actions required to allow the development to proceed lawfully.

6.5 Mitigation actions for several ecological receptors on site have already been identified and should be included in a CEMP (secured by planning condition), including:

- The retention of as much of the habitat that qualifies the site as a SINC;
- Measures to protect the other SINCs during construction;
- Provision of a bat sensitive lighting regime;
- Removing vegetation outside of the nesting bird season;
- Removing dense vegetation using a two-phase approach to protect small mammal species; and

6.6 Ensuring that the sites value and function as a SINC is protected and enhanced during the operation phase.

6.7 Specifications have also been made in section 5 of this report which aims to compensate for lost habitat and which should enable the SINC to continue to function as a space for nature.

6.8 The ecological enhancements specified in this report target UK, London and Wandsworth Action Plan species, to help enhance the qualitative biodiversity value of the site. These enhancement measures should be described in detail, along with their management of prescriptions, within an EMP, which should be secured by condition.

6.9 These enhancements should aim to create a net gain in biodiversity value on site under the Defra Metric 3.0 methodology, therefore ensuring the development meets national, regional and local standards in planning and biodiversity.

FIGURE 1 SITE PLAN

Fawe Park Road

- Tree with Low Bat Roosting Potential
- Feature with Moderate Bat Roosting Potential
- Target Note
- Red Line Boundary
- inaccessible
- Scattered Trees
- Building
- Dense Continous Scrub
- Broad Leaved Woodland
- Private Gradens

N

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Fig 1.0 Site Plan and Habitat Map

Project Number 551734
July 2021
1 to 2400 at A3

APPENDIX 1 RELEVANT LEGISLATION AND POLICY

Current key legislation relating to ecology includes the Wildlife and Countryside Act 1981 (as amended)[11]; The Conservation of Habitats and Species Regulations 2017 ('Habitats & Species Regulations')[12], The Countryside and Rights of Way Act 2000 (CRoW Act)[13], and The Natural Environment and Rural Communities Act, 2006[14].

The Conservation of Habitats and Species Regulations 2017

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)[15], and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')[16], and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')[17] into UK law (in conjunction with the Wildlife and Countryside Act).

Regulation 43 and 47 respectively of the Conservation of Habitats & Species Regulations makes it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2 (European protected species of animals), or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5 (European protected species of plant). Development that would contravene the protection afforded to European protected species requires a derogation (in the form of a licence) from the provisions of the Habitats Directive.

Regulation 63 (1) states: 'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which —

> (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and
>
> (b) is not directly connected with or necessary to the management of that site;

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats[18] (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

The Countryside and Rights of Way Act 2000

The Wildlife and Countryside Act has been updated by the CRoW Act. The CRoW Act amends the law relating to nature conservation and protection of wildlife. In relation to threatened species it strengthens the legal protection and adds the word 'reckless' to the offences of damaging, disturbing, or obstructing access to any structure or place a

protected species uses for shelter or protection, and disturbing any protected species whilst it is occupying a structure or place it uses for shelter or protection.

The Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities Act 2006 states that every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Biodiversity Action Plans provide a framework for prioritising conservation actions for biodiversity.

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (*Erinaceus europaeus*), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan[19] (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework[20] (and Biodiversity 2020 strategy[21] in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020[22] and EU Biodiversity Strategy (EUBS)[23], this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

Biodiversity Action Plans

Non-statutory Biodiversity Action Plans (BAPs) have been prepared on a local and regional scale throughout the UK over the past 15 years. Such plans provide a mechanism for implementing the government's broad strategy for conserving and enhancing the most endangered ('priority') habitats and species in the UK for the next 20 years. As described above the UK BAP was succeeded in England by Biodiversity 2020 although the list of priority habitats and species remains valid as the list of *Species of Principal Importance for Nature Conservation*.

Regional and local BAPs are still valid however and continue to be updated and produced.

Detail on the relevant BAPs for this site are provided in the main text of this report.

Legislation Relating to Nesting Birds

All nesting birds, with certain exceptions, are protected from intentional killing, destruction of nests and destruction/taking of eggs under the Wildlife and Countryside Act 1981 (as amended) and the CRoW Act. Any clearance of dense vegetation should therefore be undertaken outside of the nesting bird season, taken to run conservatively

from March to August (inclusive), unless an ecologist confirms the absence of active nests prior to clearance.

Legislation Relating to Reptiles

All species of reptile native to the UK are protected to some degree under national and/or international legislation, which provides mechanisms to protect the species, their habitats and sites occupied by the species.

Sand lizards and smooth snakes are European protected species and are afforded full protection under Section 9 of the Wildlife and Countryside Act 1981 and Regulation 43 of the Conservation of Habitats and Species Regulations 2017. However, these species are rare and highly localised. Their occurrence is not considered as relevant in this instance, as the ranges and specialist habitats of these species do not occur at this site.

The remaining widespread species of native reptiles (adder, grass snake, slow worm and viviparous lizard) are protected under part of Section 9(1) and all of Section 9(5) of the Wildlife and Countryside Act 1981. They are protected against intentional killing and injury and against sale, transporting for sale etc. The habitat of these species is not protected. However, in terms of development, disturbing or destroying reptile habitat during the course of development activities while reptiles are present is likely to lead to an offence under the Wildlife and Countryside Act 1981. It is therefore important to identify the presence of these species within a potential development site. If any of these species are confirmed, all reasonable measures must then be taken to ensure the species are removed to avoid the threat of injury or death associated with development activities.

Each species of native reptile has specific habitat requirements but general shared features include a structurally diverse habitat that provides for shelter, basking, foraging and hibernating.

All reptiles are BAP species and as such are also of material consideration in the planning process due to the NPPF.

Legislation Relating to Bats

All UK bats and their roosts are protected by law. Since the first legislation was introduced in 1981, which gave strong legal protection to all bat species and their roosts in England, Scotland and Wales, additional legislation and amendments have been implemented throughout the UK.

Six of the 18 British species of bat have Biodiversity Action Plans (BAPs) assigned to them, which highlights the importance of specific habitats to species, details of the threats they face and proposes measures to aid in the reduction of population declines.

Although habitats that are important for bats are not legally protected, care should be taken when dealing with the modification or development of an area if aspects of it are deemed important to bats such as flight corridors and foraging areas.

The Wildlife & Countryside Act 1981 (WCA) was the first legislation to provide protection for all bats and their roosts in England, Scotland and Wales (earlier legislation gave protection to horseshoe bats only.)

All eighteen British bat species are listed in Schedule 5 of the Wildlife and Countryside Act, 1981 and under Annexe IV of the Habitats Directive, 1992 as a European protected species. They are therefore fully protected under Section 9 of the 1981 Act and under Regulation 43 of the Conservation of Habitats and Species Regulations 2017, which transposes the Habitats Directive into UK law. Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; and
- Intentionally or recklessly obstruct access to a bat roost.

This legislation applies to all bat life stages.

The implications of the above in relation to the proposals are that where it is necessary during construction to remove trees, buildings or structures in which bats roost, it must first be determined that work is compulsory and if so, appropriate licenses must be obtained from Natural England.

Legislation Relating to Badger

The Protection of Badgers Act 1992 consolidates the previous Badger Acts of 1973 and 1991. The purpose of this Act is to protect the animals from deliberate cruelty and from the incidental effects of lawful activities which could cause them harm. It is thus an offence to:

- Intentionally capture, kill or injure a badger;
- Damage, destroy or block access to their setts;
- Disturb badgers in setts;
- Treat a badger cruelly;
- Deliberately send or intentionally allow a dog into a sett; and
- Bait or dig for badger.

Within the Act a sett is defined as 'any structure or place, which displays signs indicating current use by a badger'.

In addition to this, in some circumstances, the intentional destruction of foraging area required to support a known group of badgers may be considered an offence by constituting cruel treatment of a badger.

Legislation Relating to other mammals

The Wild Mammals (Protection) Act 1996 is to make provision for the protection of all wild mammals, which are not domestic or captive, from certain cruel acts.

Legislation Relating to Natura 2000 Sites and Habitats Directive Annex I/II Species

European Commission Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive'), and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive') form the cornerstones of nature conservation legislation across EU member states. Priority species requiring protection across Europe are listed in the Annexes of these Directives. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 and Offshore Marine Conservation Regulations, 2007 (as amended) transpose these directives into UK law and set the basis for the designations of protected sites (known as Natura 2000 sites; Special Areas of Conservation under the Habitat Directive and Special Areas of Protection under the Birds Directive) that are of importance for habitats, species or assemblages listed on the directive Annexes. In the UK Ramsar sites are also offered the same level of protection as SPAs and SACs however the qualifying species for the designation may differ; Ramsar sites being designated specifically as important wetland habitats.

Under article 6(3) of the Habitats Directive, where projects stand to have likely significant effect (in accordance with the European Court of Justice ruling of C-127/02 Waddenzee cockle fishing) upon the integrity of conservation objectives (i.e. conservation status of the qualifying species or habitats) within the designated sites then the Competent Authority must undertake an Appropriate Assessment.

Planning Policy

National

National Planning Policy Framework (NPPF)

Guidance on nature conservation within planning is issued by the Government within the National Planning Policy Framework[24]. This Framework document acts as guidance for local planning authorities on the content of their Local Plans, but is also a material consideration in determining planning applications.

The NPPF has replaced, among other planning guidance documents, Planning Policy Statement 9: Biological and Geological Conservation[25]. However, the accompaniment to PPS9, government circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact within the Planning System[26], remains valid. The prevention of harm to biodiversity through prudent planning decisions is the key principle

in the NPPF when considering planning and the natural environment; set out in section 11.

Within the NPPF the Government's vision for conserving and enhancing biological diversity in England within the planning system is set out. The Governments objectives for planning from an ecological perspective are, among others, to recognise the wider benefits of ecosystem services, minimise the impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, which will include the establishment of coherent ecological networks that are more resilient to current and future pressures.

Of particular note to ecological impact assessment is paragraph 152 of the Plan-Making Section which states:

"Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate".

As a result of the NPPF any species or habitats of principal importance found on the application site, in addition to statutorily protected species, are of material consideration in the planning process.

Regional

The London Plan 2021

Green Infrastructure and Natural Environment

Policy G1 Green infrastructure

A. London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green Infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.

B. Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.

C. Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:

    1. identify key green infrastructure assets, their function and their potential function

2. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

Policy G2 London's Green Belt

A. The Green Belt should be protected from inappropriate development:

1. development proposals that would harm the Green Belt should be refused except where very special circumstances exist,

2. subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.

Policy G5 Urban greening

A. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

B. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.

Policy G6 Biodiversity and access to nature

A. Sites of Importance for Nature Conservation (SINCs) should be protected.

B. Boroughs, in developing Development Plans, should:

1. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks

2. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them

3. support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans

4. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context

5. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

C. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

1. avoid damaging the significant ecological features of the site
2. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
3. deliver off-site compensation of better biodiversity value.

D. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

E. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

A. Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Supplementary Planning Guidance (SPG): Sustainable Design and Construction 2014

As part of the London Plan 2011 implementation framework, the SPG, relating to sustainable design and construction, was adopted in April 2014 and includes the following sections detailing Mayoral priorities in relation to biodiversity of relevance to The Site.

Nature conservation and biodiversity

The mayor's priorities include ensuring 'developers make a contribution to biodiversity on their development Site'.

Overheating

Where priorities include the inclusions of 'measures, in the design of schemes, in line with the cooling hierarchy set out in London Plan policy 5.9 to prevent overheating over the scheme's lifetime'

Urban greening

A Priority is for developers to 'integrate green infrastructure into development schemes, including by creating links with wider green infrastructure network'.

Use less energy

'The design of developments should prioritise passive measures' which can include 'green roofs, green walls and other green infrastructure which can keep buildings warm or cool and improve biodiversity and contribute to sustainable urban drainage'.

Local

The Wandsworth Biodiversity Strategy

Sets out five key principles which will guide the priorities for borough-wide collaborative action at the landscape scale to protect and enhance biodiversity and to make nature accessible to all:

1. Better: Improving the quality of existing priority habitats and landscapes
2. Bigger: expanding the areas of priority habitats and landscapes
3. More: creating new areas of habitat or new landscapes
4. Joined-up: improving links and connectivity between habitats at the landscape scale
5. Promote: informing local individuals and communities about how they can understand and appreciate priority habitats and landscapes and crucially the role they have in delivering measures to nurture wildlife on their doorstep.

The strategy includes implementing measures that will ensure biodiversity research and evidence is kept up to date, that priority places, habitats and species are protected, well managed and enhanced and that overarching issues such as invasive non-native species, and biodiversity net gain are understood and necessary guidance is made available.

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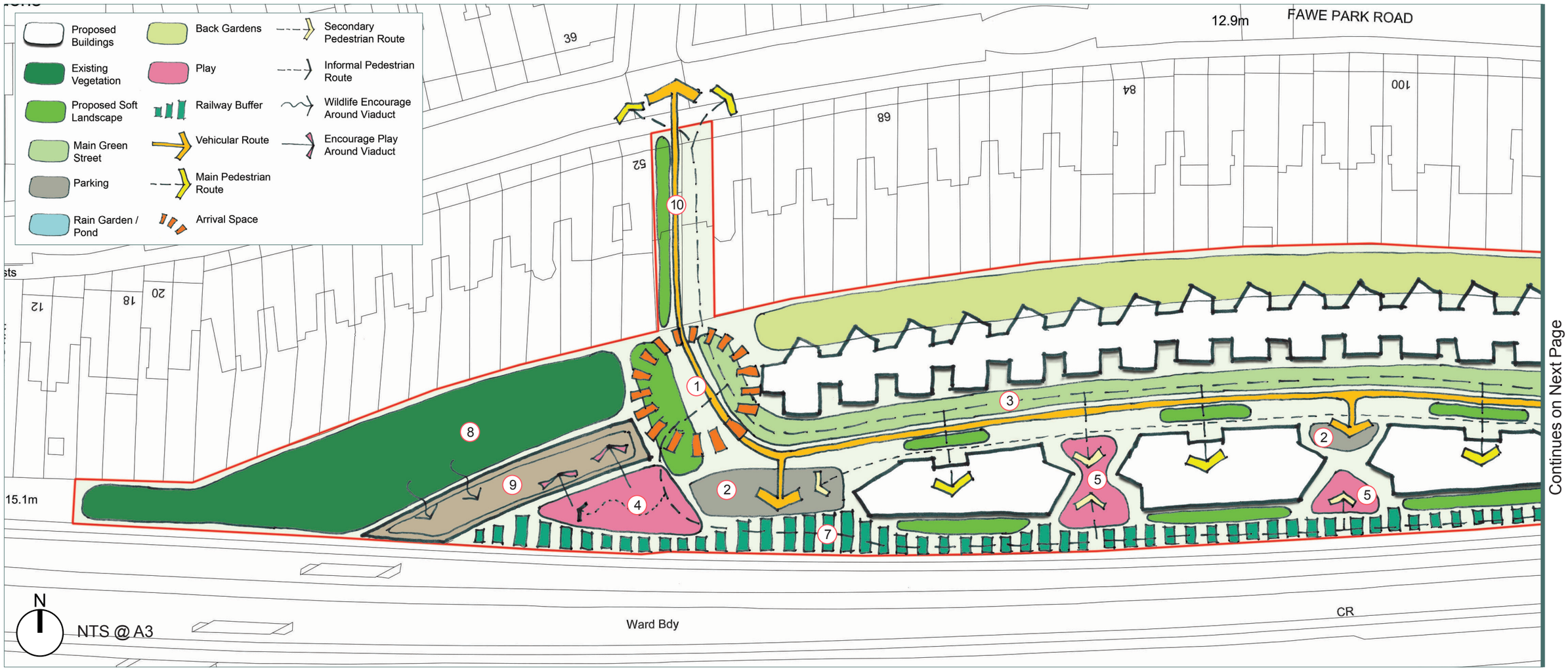
Fawe Park Road - Initial Concept

Spatial Concept Diagram

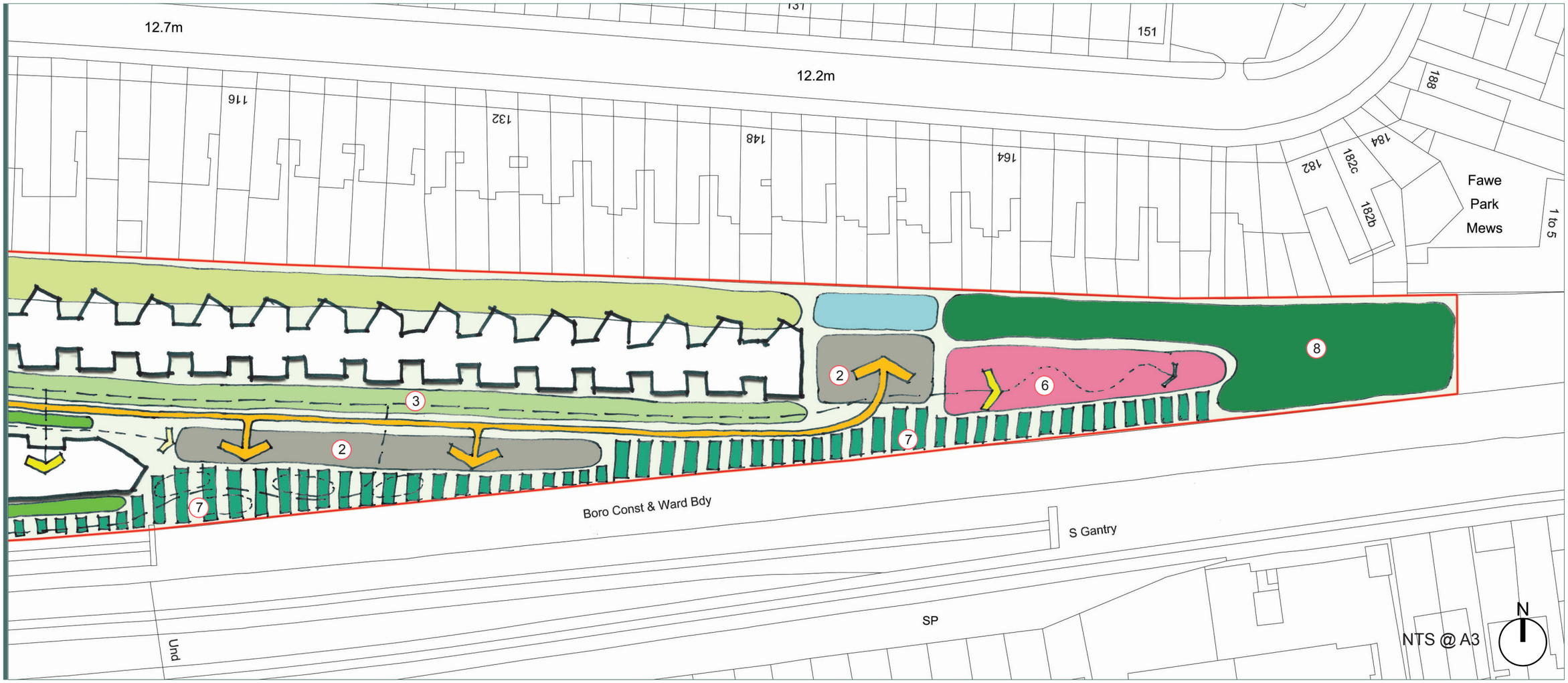


The concept for the landscape is to retain as much of the existing vegetation as possible, mostly at either end of the site, and to create a rich, green landscape setting for the new buildings. The site levels dictate that any existing tree cover at the centre of the site will need to be removed, however the proposals seek to integrate as much new greening as possible, in a wide variety of forms, as set out in the initial concept diagram.

A ‘green’ street will be created along the main spine of the site, using street tree planting and linear shrub planting to create a very soft appearance. The idea of vertical greening will also be explored, perhaps as a way of hiding the bin stores outside the houses.

At the entrance to the flats a change in carriageway surface material is proposed, to create a rhythm along the street and highlight the entrances, additional greening at each of these nodes would also further enhance these spaces. Play will be located throughout the site, smaller pocket play spaces between the blocks and larger play areas at either end. Parking will be integrated as sympathetically as possible, with planting used to break up the parking.

Fawe Park Road - Initial Concept

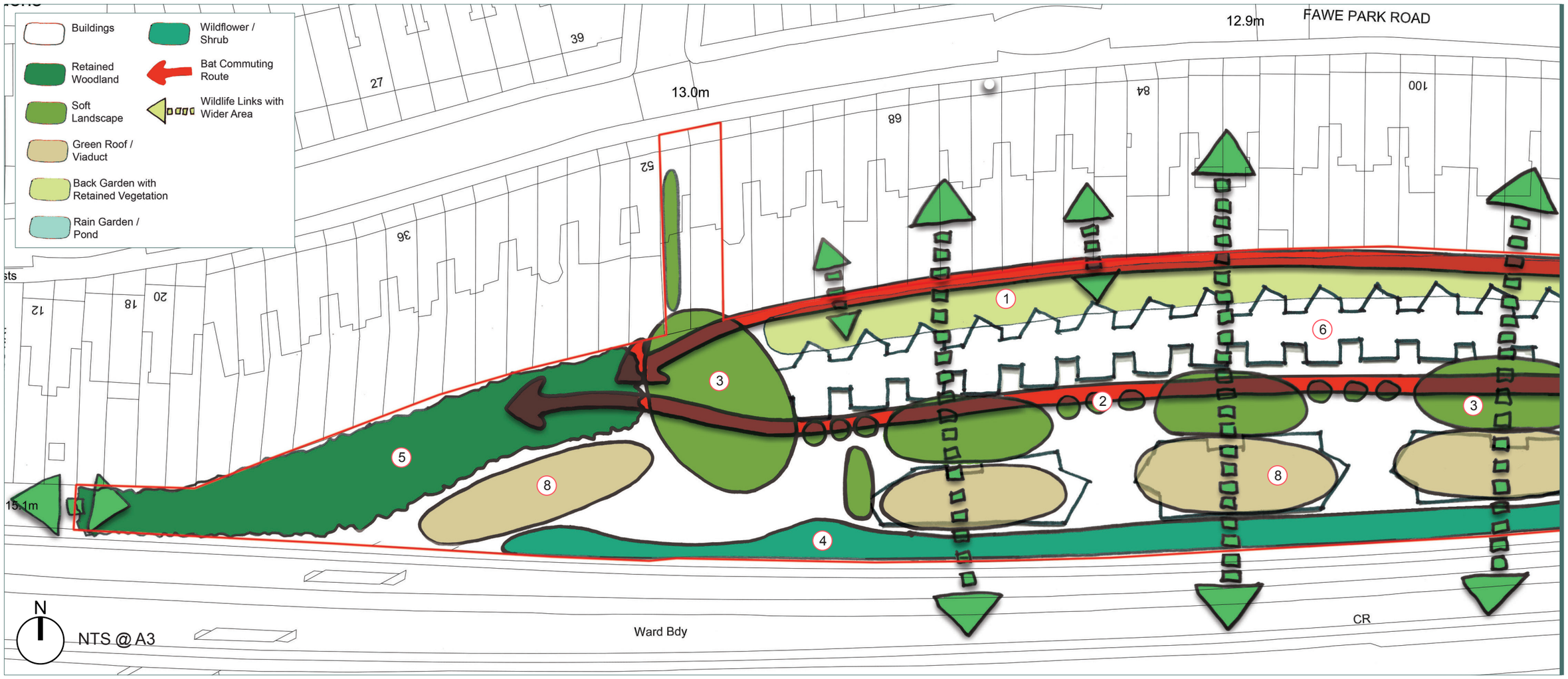


Legend

1. Arrival Gateway
2. ‘Green’ Car Parking
3. ‘Green’ Street
4. Active Play
5. Doorstep Play
6. Natural Play
7. Railway Buffer
8. Existing Vegetation retained
9. Viaduct retained
10. Access Road

Fawe Park Road - Initial Concept

Ecological Enhacements Diagram



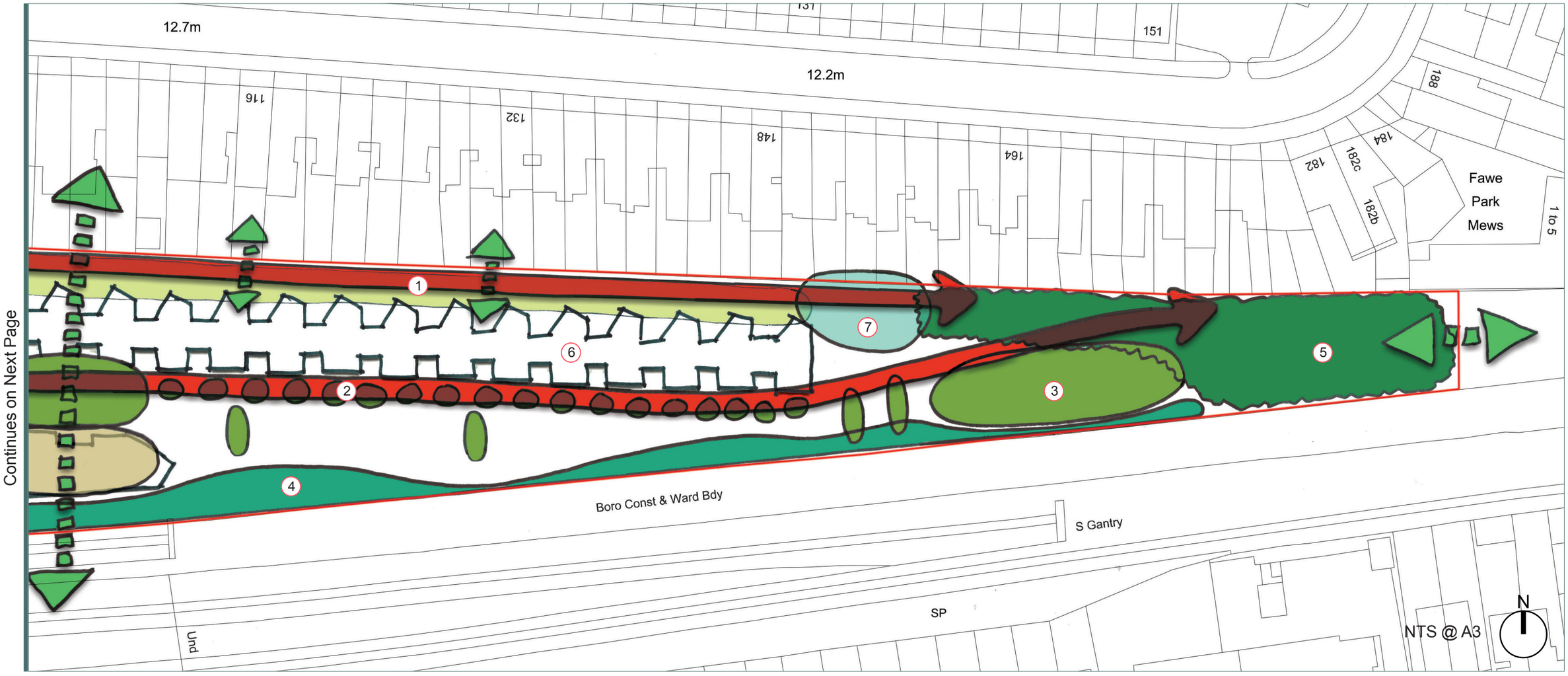
The Ecology Consultancy have carried out desk studies and surveys of the site. Their recommendations have informed our proposals and seek to improve the quality of the SINC and encourage a wider diversity of flora and fauna to the site.

The site is currently identified as a Borough Grade II listed SINC, due to its role as a wildlife corridor and “habitat stepping-stone” for the wider Wandsworth borough, and also for the presence of BAP important broad-leaf woodland. Therefore one of the site’s main values to ecology is its ability to link the network of habitats in the surrounding area.

Although development will reduce the overall amount of natural coverage, these habitat links can still be retained and an acutally be enhanced, with sensitive ecological treatments and biodiverse new soft landscaping.

Biodiversity can be increased on site by the creation of a habitat mosaic using a wide variety of plant species, to include: existing mature woodland and scrub, new trees (native as far as possible), native shrub planting, wildflower meadow, a pond area, ornamental planting high in pollen, as well as other features such as log piles, green walls, green roofs and a rain garden.

Fawe Park Road - Initial Concept



The following species groups were identified as being either on the site or having the potential to use the site, and the ecology reports provides the following advice:

Invertebrates:
There are several scarce invertebrate species found on the site, mainly with the woodland areas, which should be retained as far as possible. New areas of flower-rich habitats would improve the SINC for invertebrates. Standing deadwood and trees with ivy should be retained as should existing ground cover underneath the trees to be retained.

Birds:
The broad leaved woodland is likely to be home to breeding birds and should retained as far as possible.

Reptiles:
There were none found on site during recent surveys, but to encourage reptiles to the site as well as improving the overall biodiversity of the site, the following species should be planted - hawthorn, blackthorn, bramble, dogwood, guelder rose and wildflowers.

Bats:
The site acts as a link for commuting bats and lines of trees should be created to enhance these links further. The habitats at either end of the site should also be retained. Lighting levels should also be kept to a minimum, enough to create a safe environment for people, but not excessive.

Ecological Enhacements

1. There are some existing trees found within what will become the rear gardens of the houses. Where site levels allow these should be retained, otherwise new native trees planting is proposed, to help create a continuous tree line, acting as a screen between the new and proposed housing and to provide a commuting bat route and wider wildlife corridor.

2. The main street will be as green as possible with street tree planting, facade greening to the houses and lower level planting (see 3 below). Native species will be used as far as possible. This continuous green spine through the site will further enhance the bat commuting route. Low level lighting will be used as far as is practicable, to create a safe environment without disturbing the bats.

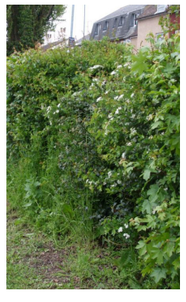
3. The ornamental shrub and herbaceous planting at the gateway and along the spine road and within the play areas, will be chosen to provide a wide variety of foraging materials, including, berries, fruit and pollen rich species to encourages invertebrates, hedgehogs and birds. The RHS 'Perfect for Pollinators' plant list will be used as a guide.




Indicative species to include the following:

Lavender
Apple
Cherry
Pyracantha
Clematis
Allium
Skimmia
Geranium
Rosemary
Dogwood

4. There is likely to be a level change along the railway buffer where low level shrub planting, hedgerow and ground covers will be used. On more level areas, wild flower planting is proposed to provide habitat for open scrub and grassland species of invertebrates and reptiles.

Indicative species to include the following:

Field scabious
Oxeye daisy
Yarrow
Ivy
Hawthorn
Blackthorn
Hazel
Guelder rose

5. The western and eastern extents of the site are to be retained as undisturbed as possible, as recommended in the ecology reports, with additional planting to the edges or to enhance the tree cover. These are important areas of broad leaved woodland, providing key closed-canopy shade, dead wood and leaf litter, habitats for invertebrates and birds. Log piles and hibernaculum should be created to encourage stag beetles and other invertebrates.



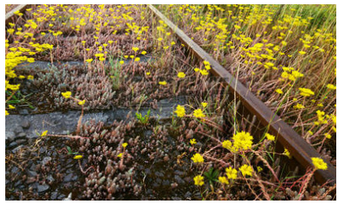
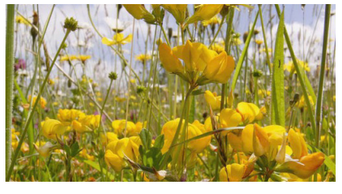
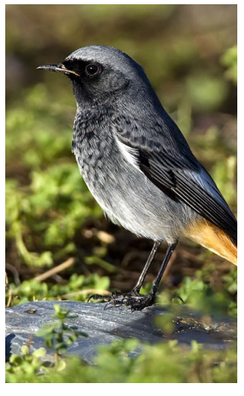
Indicative species to include the following:

Hazel
Oak
Elder
Elm
Holly
Bluebells
Honeysuckle
Lesser celandine
Cow parsley

6. Buildings will incorporate bird and bat boxes, to encourage roosting

7. A rain garden - a planted depression that allows rainwater runoff from impervious surfaces and building roofs - will be created at the eastern end of the site. If space allows, this could become more permanent feature and be developed as a pond. This would allow for a greater diversity of plants and would encourage wetland species, such as frogs to visit the site.

8. Greenroofs on the apartment blocks and brownfield scrub on the top of the viaduct will provide open ground habitat for invertebrates, solitary bees and potentially the Black Redstart

Indicative species to include the following:

Sedum species
Lady's bedstraw
Birdsfoot trefoil
Wild marforam
Red fescue

Fawe Park Road

- Tree with Low Bat Roosting Potential
- Red Line Boundary
- inaccessible
- Scattered Trees
- Building
- Dense Continous Scrub
- Broad Leaved Woodland
- Private Gradens

N

Greengage

Greengage Environmental Ltd
9 Holyrood Street, London SE1 2EL

www.greengage-env.com

Fig 1.0 Site Plan and Habitat Map

Project Number 551734
July 2021
1 to 2400 at A3

Wandsworth Local Plan Review

Consultation on the Publication Draft Local Plan Review

Submissions on behalf of Northport FPR Limited

Fawe Park Road, Putney

Background

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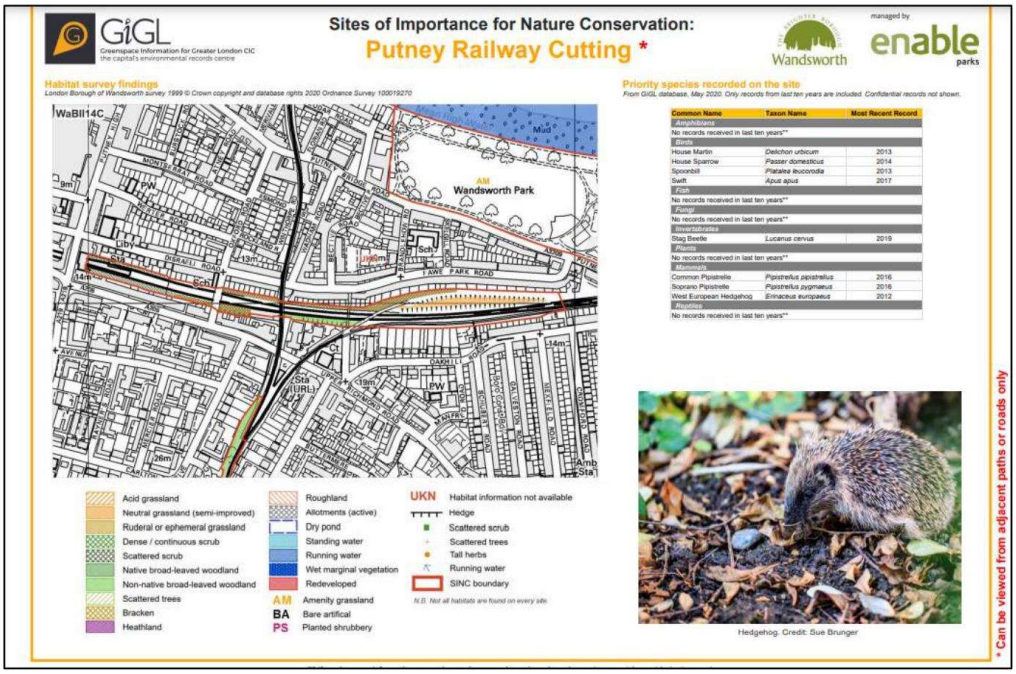

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19. From the Councils SHELAA document (January 2022) they have estimated that they will be able to deliver 24,381 homes between 2023/4 and 2037/38, more than the minimum number required. However the level of delivery as indicated in Table 4 of this document shows a significant decline in delivery on all sites post the first five years. Even in the first five years there is a significant reliance on large sites.

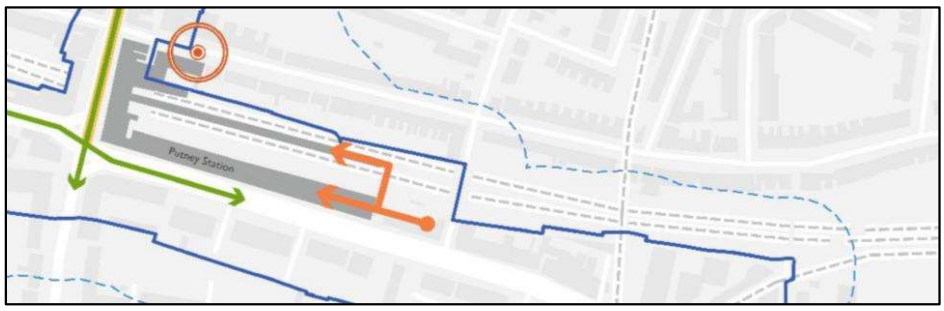
20. From Appendix A, Table 9 of that document we can see that on large sites the majority of this delivery is expected to occur on sites within Nine Elms, then Clapham Junction and then Wandsworth (Town). The subject site is located within Putney where only 130 dwellings are expected to be delivered on large sites in the first five years of the plan (2023/24 – 2027/28).

21. Other than in Tooting and Balham this is the lowest level of expected delivery by area in this plan period. Delivery of housing here will provide some balance to this factor and delivery both market and affordable housing in those early years.

22. Policy SDS1B suggests that Putney has a housing capacity of 203 new homes during the plan period. This is a matter that we dispute given the availability of the subject site and its delivery capability, even retaining land for biodiversity. Policy PM5B is

also relevant in that it also refers to "*Development in Putney will help meet the borough's housing target, as set out in Local Plan Policy SDS1. The area has capacity to provide 200 homes by 2032/33, over the first 10 years of the Plan period*". In our view this is a very low level of delivery for an accessible and sustainable area.

23. Map 7.1 shows that the Area Strategy Boundary for Putney includes most of the subject site – see extract below and the blue dashed line:



24. This Map also identifies the location of the six allocated sites within the Putney area. Whilst not on the extract above these are all located along the High Street or just off this street in Putney, to the north west of the subject site. They are all mixed use schemes with residential likely provided for only on upper floors, given the town centre location.

25. The Councils 'Wandsworth Local Housing Needs Assessment (December 2020) refers to the housing mix need in the Borough. It indicates at Table 30 that the greatest need in the market sector is for 3+ bedroom units at 58% of total need. For affordable need the reverse is the case, with the greatest need for smaller units.

26. Therefore to deliver the market housing sector need, larger properties, often with gardens are needed. Consequently with these can be provided where land is more spacious, rather than In locations such as Nine Elms and Battersea. The smaller units to meet the affordable need will then complement the market need. But it is unlikely that any of the mixed use allocations in Putney will meet this need.

27. This approach to supporting the need for family sized accommodation given the need for this size of accommodation, which is also found in existing adopted policy, supports the restraint to the loss of family sized accommodation through conversion.

28. The proposals for the subject site will meet both needs with the delivery of larger family sized houses and also smaller affordable housing, all in a well landscaped and biodiversity setting.

29. We have been working on the delivery of the site for some time and up to date ecological surveys have been undertaken to establish the true value of the site in ecological and nature conservation terms.

30. An indicative layout plan is provided that shows how the site could be developed as indicated.

31. The submissions are also supported by a Biodiversity Impact Assessment (BIA), a Protected Species Survey Report and a Preliminary Ecological Appraisal (PEA). These were all prepared in the context of the development proposals for the site.

32. The PEA concludes that:

> "*Mitigation actions for several ecological receptors on site have already been identified and should be included in a CEMP (secured by planning condition), including:*
> • *The retention of as much of the habitat that qualifies the site as a SINC;*
> • *Measures to protect the other SINCs during construction;*
> • *Provision of a bat sensitive lighting regime;*
> • *Removing vegetation outside of the nesting bird season;*
> • *Removing dense vegetation using a two-phase approach to protect small mammal species; and*

33. The Protected Species Report concludes:

> *Upon successful implementation of all mitigation compensation and enhancement measures, the development proposals are considered to result in either neutral or positive impacts on each of the specified ecological receptors during both the construction and operational phase of the development, and proposals are considered to be in full compliance with legislation and policy surrounding the protection of protected species and green infrastructure. Furthermore, the function of the SINC as a wildlife corridor will be maintained*.

34. As indicated in this extract from the report conclusions even with the indicative proposals in place the function of the SINC as a wildlife corridor will be maintained. In this respect those aspects of the site of any value for nature conservation can be maintained with the proposed indicative layout through a suitable buffer between built development and the railway edge.

35. Accordingly its designation as a SINC is not a reason for the Council not to allocate the site for residential development. However that designation does need to be revisited in light of the most up to date data.

36. A BIA has been undertaken in respect of the subject site and concludes that "*The scheme [is] considered to be maximising the opportunity for onsite ecological enhancement in light of the development proposals..... Detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and long-term management should be provided within an Ecological Management Plan (EMP) for the site which could be secured through planning condition. Should these recommendations be adhered to, the proposals stand to be compliant with legislation and current planning policy*".

37. It is therefore considered that these reports provide the most informed information as to the nature conservation value of the subject site today, rather than relying on erroneous data from years ago. This differs from the value attributed to it by GIGL and Wandsworth in seeking to maintain at least part of the area as a SINC. The site is capable of accommodating residential development as proposed that will be of significant benefit to the delivery of housing within the Borough over the plan period. Indeed it can deliver housing within the first five years of the plan.

38. Further this can be achieved with improvement of the existing value of the site and with enhancement of the ecological value, particularly at the western end where it adjoins the residual extent of the existing nature conservation designation. It will also allow for the retention of a landscape buffer parallel with the railway between the proposed built development and the railway edge.

39. The site has a PTAL of 4, providing good access to mainline services at Putney Station to the west (c750m) and to the underground at East Putney Station to the south west (c460m). There are also five bus routes within c450m of the site on Putney Bridge Road and Upper Richmond Road.

40. There are shops and services at East Putney and a wider range at Putney itself. The subject site is located within a sustainable location.

Recommendation

41. Designate the site in the draft Wandsworth Local Plan Review as a residential led development site with areas set aside for retention and enhancement for nature conservation, biodiversity and wildlife corridor.

Representations on behalf of Northport FPR Limited in respect of the Wandsworth Draft Local Plan: Pre-Publication version – January 2021

1. Our clients are in control of land on the south side of Fawe Park Road, Putney (see attached plan) and have promoted these through both a pre-application meeting with the Council and also its 'Call for Sites'. This land is shown on the attached plan.

2. Our representations are divided into three areas – procedural; site specific and evidence base.

Procedural Matters

3. As noted above the subject site was promoted through the Councils 'Call for Sites'. The site was submitted as a potential housing site through this process in December 2018. Despite being advised that feedback would be provided to this process none has been received and there is nothing in the evidence base for the draft local plan that provides any detail as to whether this site was either assessed and if it was the outcome of such assessment.

4. We consider that this is a significant flaw in the evidence base behind the current draft local plan.

5. The Council published the draft local plan for consultation on 4th January 2021. However, there were important areas of the evidence base that were not published in a simultaneous manner. This included a document entitled 'Housing and Economic Land Availability Assessment- January 2021. It has been said that the draft plan is underpinned by the evidence base.

6. However, this document, that extends to 17 pages, was not published until 8th February 2021, only three weeks before the end of the consultation period on the draft local plan. This is significantly short of a standard six week consultation period. It also fails to address the shortfall in information noted above. It refers to the 'Call for Sites' and the number of sites considered and allegedly assessed but provides no detail on these matters.

7. Again the late publication of this important aspect of the evidence base is also considered a significant flaw in what should be the transparent nature and

soundness of the local plan production process. There is no analysis as to why some sites have been promoted through allocations in the draft local plan and others have not.

8. In both these respects we consider that this Regulation 18 version of the draft local plan is unsound.

Site Specific

9. The subject site is located on the south side of Fawe Park Road, between the rear of the houses in that road and the railway line, that serves Putney Station to the west and Wandsworth Town to the east.

10. Neither the printed nor interactive version of the local plan policies map show that the site is subject to any designation. However only investigation was there a reference to the railway lands buried in a schedule.

11. However, given this land is secured by Network Rail as it is unfenced from the operational railway network, the Council has neither historically accessed the site or requested any access to the site to verify the value or otherwise of the site in nature conservation terms. In contrast we submitted as part of the previous pre-application submission detailed ecological and biodiversity reports that confirmed that other than a number of trees on the site it actually had limited nature conservation value. This informed the proposals for a residential led proposal, with a net biodiversity gain.

12. After significant investigation, the designation 'hidden' in the extant local plan seems to have been solely informed by the fact the site is linear, is former railway land and adjoins a railway line and so must have ecological and biodiversity value. But this is not underpinned by any actual evidence.

13. The draft Local Plan is accompanied by a document entitled 'Policies Map Changes Document Local Plan Regulation 18 Consultation Version November 2020'. Figure 18 within this document on page 24 is entitled 'Sites of Importance to Nature Conservations' and shows the subject site, at small scale, within a broadly linear green strip to the north of the railway line and to the east of Putney Station.

14. The reason for inclusion of this plan is stated as:

The Policy Map includes asterixis within this designations Metropolitan Open Land; Statutory Local Nature Reserves; Historic Parks and Gardens; Other Larger Protected Open Spaces which identify which sites are also Sites of Importance to Nature Conservation (SINCs). These asterixis are proposed to be removed and a separate SINCs designation be included in order to show the exact boundaries of SINCs and the different levels of designation. The designation is proposed to be included to support the Local Plan Policy LP 57 Biodiversity.

15. However this is the reasoning for including the Figure, rather than the reasoning for the site designation in the first instance.

16. The draft local plan itself deals with Nature Conservation at draft Policy LP57 and the supporting text. Paragraph 21.28 states "*Wandsworth has a high level of biodiversity, with a total of 1,600 different species recorded within 27 different habitat types. We host six species of bats, have badger sets and several rare and endangered species can be found in Wandsworth, including peregrine falcons, black redstarts and stag beetles. Wandsworth's areas of biodiversity importance include Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINC), which also includes two subcategories of borough and local importance..... A variety of smaller sites also exist but are not large enough to be mapped".*

17. Map 21.3 then sets out the mapped areas of Nature Conservation Importance. As noted in Figure 18.3 of the Policy Map Changes the subject site is located within a wider broadly linear site shown as 'Borough Grade II', the lowest level, other than areas deemed to be of only 'Local' interest.

18. The draft Local Plan is supported and underpinned by a number of topic based areas of evidence. However, there is no evidence base that specifically deals with Nature Conservation or Biodiversity. There is an evidence document on Green Infrastructure that in this context means Open Space and this shows at Figure 5.1 on page 28 "Natural and semi-natural greenspace mapped with 720m catchment including NSN sites outside Wandsworth boundary". But these areas do not include Nature Conservation areas.

19. Therefore the sole basis for the inclusion of the subject site within a designation for Nature Conservation appears to be simply a role over from an historic document that designated it, that itself was based upon, at best, a view from adjoining land, rather than an access and a detailed assessment as to the sites real value. This is a significantly flawed approach where an error is simply rolled forward in the hope that it will become reality.

20. There is recent evidence that we submitted with the pre-application discussions as to the lack of any significant value in the site that has simply been ignored in the inclusion of the site in a historical designation.

21. The site that extends to 1.38ha has been promoted for a residential led development of up to 100 dwellings, together with amenity, playspace and bio-diversity enhancements. The potential of the site to contribute to the supply and delivery of housing in Wandsworth has been dismissed.

Evidence Base

22. The HELAA advises at Stage 5 in relation to the evidence base to this document that "*A detailed list of sites was produced, cross-referenced to maps of the site boundaries, with details of the assessment of each site, and projected delivery of housing or economic uses over time*". It then however states "*The list of sites or their estimated development capacities has not been publicly made available*".

23. The text continues "*The assessment looks to indicate the broad capacity for residential and economic uses across all potential sites and does not allocate particular sites for particular forms of development*". However the text in Section 3 of the Assessment provides a finite housing supply number that has been identified through the Assessment in stating "*The housing supply identified through the assessment...*".

24. This figure is then used to justify "*that the proposed London Plan target for Wandsworth of 19,500 net dwellings over 10 years would be met by the 20,700 net dwellings expected to be delivered over years 1–10 of the proposed local plan period, assuming the 19,500 target is annualised to 1,950 and then rolled forward each year for the period beyond the 2019/20–2028/29 London Plan target*". However this seems too coincidental that the proposed number of dwellings will meet the housing need. On the basis of the 'evidence base' there is no methodology that would allow a consultee to examine, sensitivity test and comment upon the assumptions made for sites, as they are all hidden.

25. For the same reasons we also need to criticise Table 3 of the HELAA that alleges that the Council can meet the tests of the NPPF. The text states "*Table 3, below, summarises that 142% of the 5-year housing supply requirement of the National Planning Policy Framework is met, and this clearly provides for the required 5% buffer to ensure choice and competition in the market for land*". Indeed it is anything but clear that the Council can meet its requirements under the Framework.

26. Finally the Conclusions state:

The housing and economic land availability assessment has assessed potential sites in the borough and their expected future land use, density and timescale for development.

The assessment shows that the needs for housing and office floorspace can be met.

27. In our view this conclusion cannot be relied upon in any manner, in the absence of any evidence to underpin such a bold statement on housing matters. The evidence base on housing is therefore flawed and unsound.

28. This is compounded in what is said above in relation to the comment from the evidence base referred to in paragraph 23, that the assessment "*does not allocate particular sites for particular forms of development*". However this is what the draft local plan does. As an example in the 'Area Strategy for Putney' and starting at page 135 there are site allocations that include allocations for "*Mixed use development including residential...".* Although this does not specifically include numbers these sites contribute to the overall Housing number in draft Policy LP24 that refers to overall 182 new dwellings for Putney. It is clear that at some point a capacity exercise has been undertaken for these allocated sites, but not published.

29. Further paragraph 17.11 of the draft local plan states "*However, meeting the objectively assessed local housing need figure (25,370) poses a significant challenge. The Council recognises that its objectively assessed housing need is far in excess of its identified sources of housing capacity".* The draft local plan therefore fails to meet its OAN as a whole. Even so in failing to do that it fails to

identify in a transparent manner how will provide the housing that it does allocate for.

30. In addition in relation to housing delivery this relies significantly on dwellings coming forward from the VNEB area and also historic permission being built out. The majority of development in this area is within high builders and therefore flatted development with limited dedicated amenity space. This does not address the undersupply of self-contained houses with their own private amenity in the London Boroughs. The importance of outdoor space associated with dwellings, highlighted by the pandemic of the last 12+ months, is an important asset. The proposal for the Fawe Park Road site will deliver a significant number of family sized homes, with private gardens and other outdoor space.

Conclusion

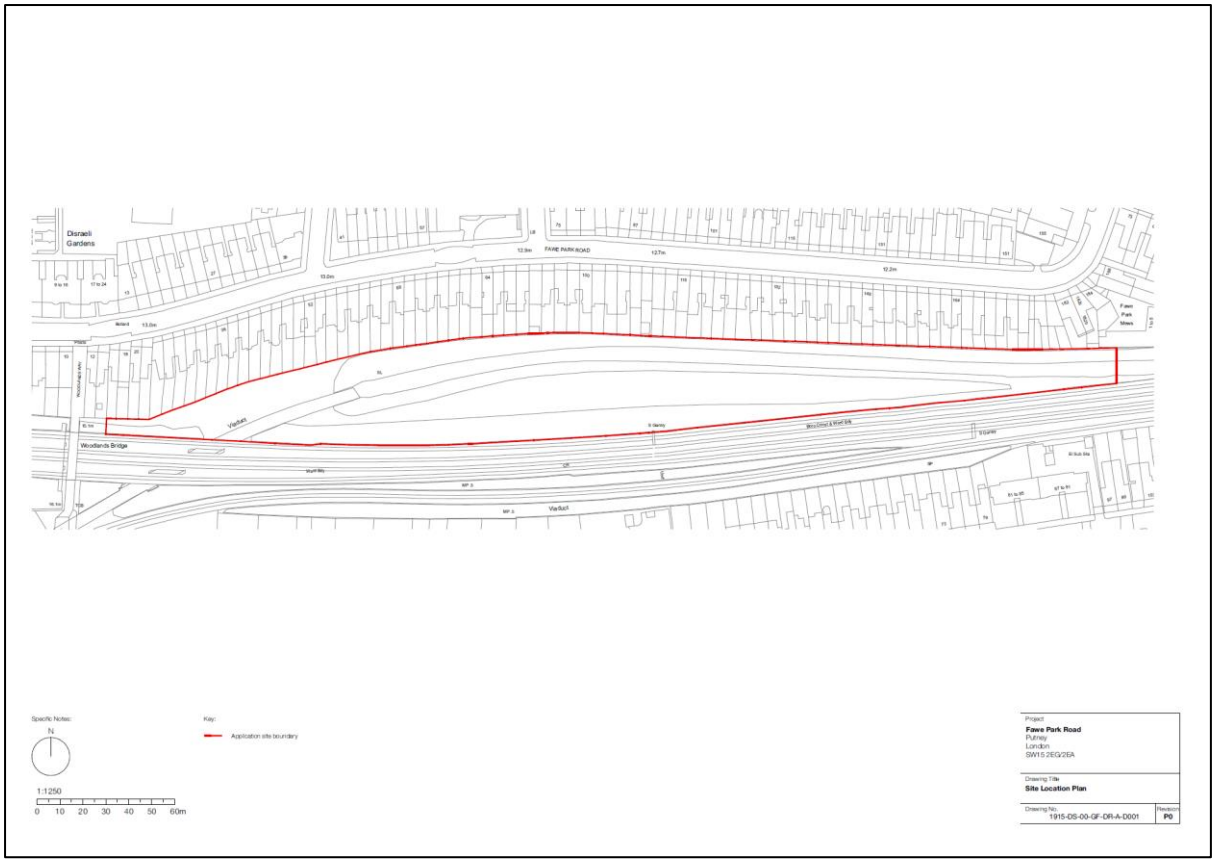
31. We have identified above a number of matters that we feel are fatal to the draft local plan on nature conservation and the delivery of housing during the plan period. The Council have failed to update any database that they may hold in respect of the value of the subject site for nature conservation. Accordingly we can only assume on the basis of the evidence that is available that they have erroneously dismissed its potential contribution to housing supply in the Borough.

32. To address these findings the subject site should be allocated for housing.

KG Creative Consultancy

February 2021

Site Plan


Disraeli Gardens
FAWE PARK ROAD
Woodlands Bridge
Viaduct
Specific Notes:
N
Key:
Application site boundary
1:1250
0 10 20 30 40 50 60m
Project
Fawe Park Road
Putney
London
SW15 2EG/2EA
Drawing Title
Site Location Plan
Drawing No.
1915-DS-00-GF-DR-A-D001
Revision
P0

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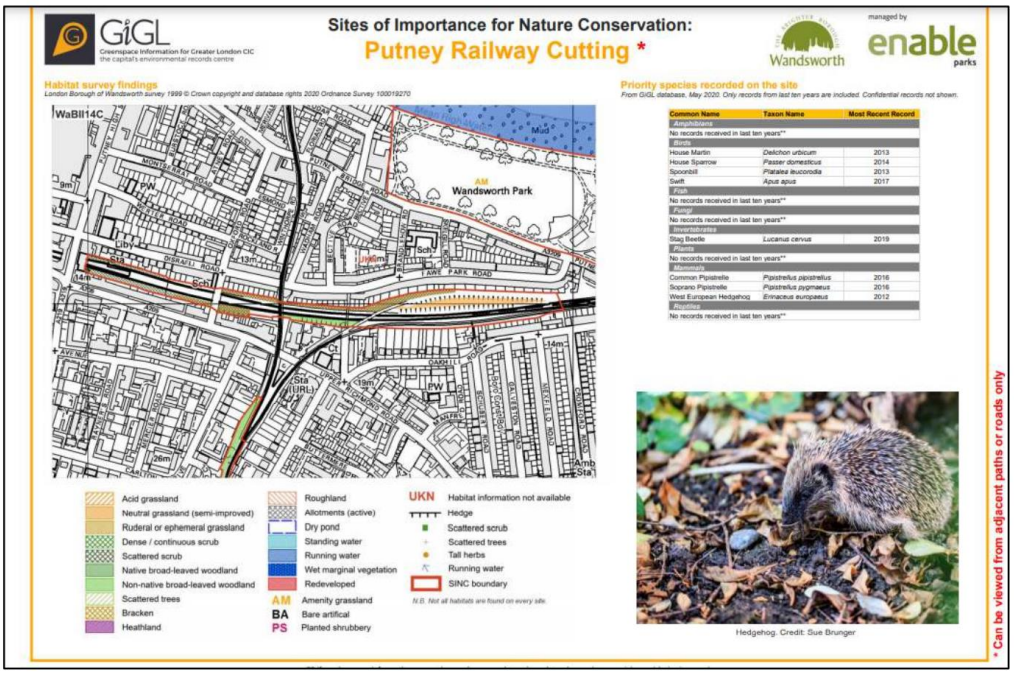

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17. The subject site is available and achievable for residential development. The issue between our client and the Council is its suitability. The Council has taken the view that its designation as a SINC is an impediment to its suitability, whereas based upon the proper and up to date information it is not considered that this is the case.

18. The Councils draft plan through Policy SDS1 states "*Within the period 2023 – 2038 the Local Plan will provide for a minimum of 20,311 new homes. This includes the provision of a minimum of 1,950 new homes per year up until 2028/2029, including on small sites*".

19. From the Councils SHELAA document (January 2022) they have estimated that they will be able to deliver 24,381 homes between 2023/4 and 2037/38, more than the minimum number required. However the level of delivery as indicated in Table 4 of this document shows a significant decline in delivery on all sites post the first five years. Even in the first five years there is a significant reliance on large sites.

20. From Appendix A, Table 9 of that document we can see that on large sites the majority of this delivery is expected to occur on sites within Nine Elms, then Clapham Junction and then Wandsworth (Town). The subject site is located within Putney where only 130 dwellings are expected to be delivered on large sites in the first five years of the plan (2023/24 – 2027/28).

21. Other than in Tooting and Balham this is the lowest level of expected delivery by area in this plan period. Delivery of housing here will provide some balance to this factor and delivery both market and affordable housing in those early years.

22. Policy SDS1B suggests that Putney has a housing capacity of 203 new homes during the plan period. This is a matter that we dispute given the availability of the subject site and its delivery capability, even retaining land for biodiversity. Policy PM5B is

also relevant in that it also refers to "*Development in Putney will help meet the borough's housing target, as set out in Local Plan Policy SDS1. The area has capacity to provide 200 homes by 2032/33, over the first 10 years of the Plan period*". In our view this is a very low level of delivery for an accessible and sustainable area.

23. Map 7.1 shows that the Area Strategy Boundary for Putney includes most of the subject site – see extract below and the blue dashed line:

24. This Map also identifies the location of the six allocated sites within the Putney area. Whilst not on the extract above these are all located along the High Street or just off this street in Putney, to the north west of the subject site. They are all mixed use schemes with residential likely provided for only on upper floors, given the town centre location.

25. The Councils 'Wandsworth Local Housing Needs Assessment (December 2020) refers to the housing mix need in the Borough. It indicates at Table 30 that the greatest need in the market sector is for 3+ bedroom units at 58% of total need. For affordable need the reverse is the case, with the greatest need for smaller units.

26. Therefore to deliver the market housing sector need, larger properties, often with gardens are needed. Consequently with these can be provided where land is more spacious, rather than In locations such as Nine Elms and Battersea. The smaller units to meet the affordable need will then complement the market need. But it is unlikely that any of the mixed use allocations in Putney will meet this need.

27. This approach to supporting the need for family sized accommodation given the need for this size of accommodation, which is also found in existing adopted policy, supports the restraint to the loss of family sized accommodation through conversion.

28. The proposals for the subject site will meet both needs with the delivery of larger family sized houses and also smaller affordable housing, all in a well landscaped and biodiversity setting.

29. We have been working on the delivery of the site for some time and up to date ecological surveys have been undertaken to establish the true value of the site in ecological and nature conservation terms.

30. An indicative layout plan is provided that shows how the site could be developed as indicated.

31. The submissions are also supported by a Biodiversity Impact Assessment (BIA), a Protected Species Survey Report and a Preliminary Ecological Appraisal (PEA). These were all prepared in the context of the development proposals for the site.

32. The PEA concludes that:

> "*Mitigation actions for several ecological receptors on site have already been identified and should be included in a CEMP (secured by planning condition), including:*
> • *The retention of as much of the habitat that qualifies the site as a SINC;*
> • *Measures to protect the other SINCs during construction;*
> • *Provision of a bat sensitive lighting regime;*
> • *Removing vegetation outside of the nesting bird season;*
> • *Removing dense vegetation using a two-phase approach to protect small mammal species; and*

33. The Protected Species Report concludes:

> *Upon successful implementation of all mitigation compensation and enhancement measures, the development proposals are considered to result in either neutral or positive impacts on each of the specified ecological receptors during both the construction and operational phase of the development, and proposals are considered to be in full compliance with legislation and policy surrounding the protection of protected species and green infrastructure. Furthermore, the function of the SINC as a wildlife corridor will be maintained*.

34. As indicated in this extract from the report conclusions even with the indicative proposals in place the function of the SINC as a wildlife corridor will be maintained. In this respect those aspects of the site of any value for nature conservation can be maintained with the proposed indicative layout through a suitable buffer between built development and the railway edge.

35. Accordingly its designation as a SINC is not a reason for the Council not to allocate the site for residential development. However that designation does need to be revisited in light of the most up to date data.

36. A BIA has been undertaken in respect of the subject site and concludes that "*The scheme [is] considered to be maximising the opportunity for onsite ecological enhancement in light of the development proposals..... Detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and long-term management should be provided within an Ecological Management Plan (EMP) for the site which could be secured through planning condition. Should these recommendations be adhered to, the proposals stand to be compliant with legislation and current planning policy*".

37. It is therefore considered that these reports provide the most informed information as to the nature conservation value of the subject site today, rather than relying on erroneous data from years ago. This differs from the value attributed to it by GIGL and Wandsworth in seeking to maintain at least part of the area as a SINC. The site is capable of accommodating residential development as proposed that will be of significant benefit to the delivery of housing within the Borough over the plan period. Indeed it can deliver housing within the first five years of the plan.

38. Further this can be achieved with improvement of the existing value of the site and with enhancement of the ecological value, particularly at the western end where it adjoins the residual extent of the existing nature conservation designation. It will also allow for the retention of a landscape buffer parallel with the railway between the proposed built development and the railway edge.

39. The site has a PTAL of 4, providing good access to mainline services at Putney Station to the west (c750m) and to the underground at East Putney Station to the south west (c460m). There are also five bus routes within c450m of the site on Putney Bridge Road and Upper Richmond Road.

40. There are shops and services at East Putney and a wider range at Putney itself. The subject site is located within a sustainable location.

Recommendation

41. Designate the site in the draft Wandsworth Local Plan Review as a residential led development site with areas set aside for retention and enhancement for nature conservation, biodiversity and wildlife corridor.

Local Plan Review

Consultation on the Publication Draft Local Plan

10 January to 28 February 2022

RESPONSE FORM

The Council is inviting comments over a seven-week period on the Publication version of the Local Plan.

The Draft Local Plan sets out a vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038. It sets out key objectives for the borough, which are supported by planning policies, area strategies, and – at the smallest scale – detailed guidance for the development of specific sites. Collectively, these identify where development should be targeted and set out how the borough's neighbourhoods and places will change over the next 15 years.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes provided at the end of the form.

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: http://www.wandsworth.gov.uk/draft-local-plan-publication

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to planningpolicy@wandsworth.gov.uk
- Post to Planning Policy and Design, Environment and Community Services, Town Hall, Wandsworth High Street, Wandsworth, SW18 2PU.

Alternatively, you can also make comments on the draft Local Plan online via our Consultation Portal, which is accessible at the website listed above.

All responses must be received by **11.59pm on Monday 28 February 2022**. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

Part A: Personal Details		
	1. Personal details*	**2. Agent's details (if applicable)**
Title	Mr	Mr
First name	James	Kevin
Last name	Thompson	Goodwin
Job title (where relevant)	Director	Director
Organisation (where relevant)	Northport FPR Limited	KG Creative Consultancy
Address	C/o Agent	77 Wray Park Road Reigate Surrey
Postcode		RH2 0EQ
Telephone		[redacted]
E-mail address		

*If an agent is appointed, please complete only the title, name and organisation boxes for the respondent and complete the full contact details for the agent.

Part B: About You…		
3. Please tell us about yourself or who you are responding on behalf of.		
Do you live in the borough?	Yes ☐	No ☒
Do you work in the borough?	Yes ☐	No ☒
Do you run a business in the borough?	Yes ☐	No ☒
Are you a student in the borough?	Yes ☐	No ☒
Are you a visitor to the borough?	Yes ☐	No ☒

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the General Data Protection Regulation (GDPR) (2018).

All responses will be held by the London Borough of Wandsworth. They will be handled in accordance with the General Data Protection Regulation (GDPR) (2018). Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at: www.wandsworth.gov.uk/privacy

Part C: Your Response		
4. Do you consider the Local Plan is:		
4.1 Legally compliant	Yes ☐	No ☒
4.2 Sound	Yes ☐	No ☒
4.3 Complies with the duty to co-operate	Yes ☒	No ☐
Further information on these terms is included within the accompanying guidance note, which can be found at the end of the response form.		
If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6. **5. Do you think the Local Plan is <u>unsound</u> because it is <u>not:</u>** ***(Please tick all that apply)***		
5.1 Positively prepared	☒	
5.2 Justified	☐	
5.3 Effective	☒	
5.4 Consistent with national policy	☒	
6. Please give details of why you think the Local Plan is not legally compliant and/or is unsound and/or fails to comply with the duty to co-operate. **Please make it clear which consultation document your comments relate to and, where applicable, please include the relevant policy name/number, the site allocation name/reference, the Policies Map change, and/or the paragraph number. Please be as precise as possible.** **If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.** *Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.*		
Please see attached statement and attachments. Local Plan Submissions Final PEA Species Report BIA Site Location Plan		

Please continue on a separate sheet / expand the box if necessary.
7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 5 above. **Please note that non-compliance with the duty to co-operate is incapable of modification at examination.** **You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.** *Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.*
The inclusion of the subject site as a site designated for residential use together with approparite bioviersity improvements and landscaping - see details in the attached statement.
Please continue on a separate sheet / expand the box if necessary.
8. If you are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate in hearing session(s)	☐
Yes, I wish to participate in hearing session(s)	☒

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.
9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: *Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*
The responder considers that the Council has failed to have adequate regard to the material that the responder has provided to date. The Council have sought to rely upon infoirmation that is years, if not decades old and has not phyiscally been on the subject site themselves. It has dismissed the proposal on the basis of dated information.
Please continue on a separate sheet / expand the box if necessary.

If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.	
If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.	☒

Signature: *For electronic responses a typed signature is acceptable.*	KG Creative Consultancy	Date:	24th February 2022

Local Plan Publication Consultation

Guidance Notes to accompany the Representation Form

Introduction

1. The plan has been published by the Local Planning Authority [LPA] in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the period set by the LPA.

2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available (including publication on the LPA's website) and taken into account by the Inspector.

Legal Compliance

3. You should consider the following before making a representation on legal compliance:

- The plan should be included in the LPA's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination.
- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement [SCI] (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The LPA is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- The plan should be in general conformity with the London Plan.
- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

Duty to Co-operate

4. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The LPA will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

Soundness

5. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

6. If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy (or the London Plan)? If so, does not need to be included?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

General advice

7. If you wish to make a representation seeking a modification to the plan or part of the plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 5 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

8. You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

9. Where groups or individuals share a common view on the plan, it would be helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

10. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.