

2026

re:shape

Ecological Appraisal & BNG

Ashley Park





Ashley Park Ecological Appraisal

Prepared for:
Re:shape T Ltd

Date:
August 2026

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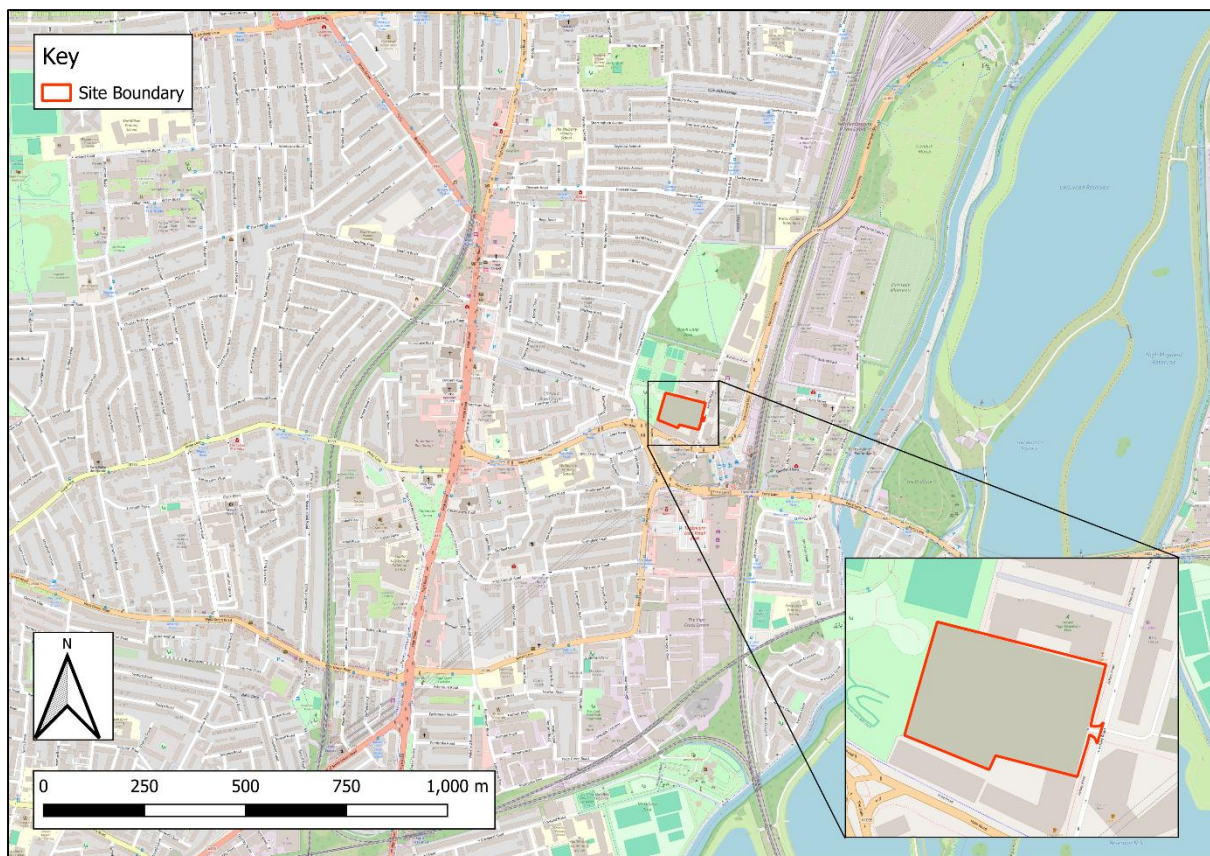
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INTRODUCTION

- 1 Re:shape T Ltd (hereinafter referred to as the 'Applicant') is seeking full planning permission for the proposed redevelopment of the former Ashley House site, located to the west of Ashley Road, south of the Rosa Luxemburg residential building, east of Down Lane Park and north of a number of residential properties along Hale Road. The site covers an area of approximately 0.7159 hectares (ha) and falls within the administrative boundary of the London Borough of Haringey (LBH).
- 2 The existing site comprises vacant brownfield land, with the previous existing buildings having been demolished in August 2023.
- 3 The scheme proposals (hereafter referred to as the Proposed Development) will provide for:
'Full planning permission for a phased mixed-use development comprising: (i) enabling works and operations; (ii) residential development (Use Class C3) including affordable housing; (iii) shared living accommodation (Sui Generis), (iv) commercial and community floorspace (Use Classes E and F2); and (v) site-wide and/or phase-specific access, servicing, public realm, blue-badge parking, cycle parking, open space, hard and soft landscaping, utilities, plant and all other associated works'.
- 4 Figure 1 identifies the site location and red line planning application boundary.

Figure 1 **Site Location and planning application boundary** (contains map data from OpenStreetMap)



Purpose

- 5 This Ecological Appraisal seeks to establish the effects of the Proposed Development upon valued biodiversity receptors, identify appropriate mitigation measures to ensure the protection of valued and legally protected features and establish enhancement opportunities within the design and through recommendations that deliver an enhancement for biodiversity. The report also provides the reporting requirements for biodiversity net gain at the planning application stage, setting out the baseline value and outlining the proposed strategy for delivering a policy and legally compliant net gain.
- 6 This Ecological Appraisal communicates the ecological constraints and opportunities relevant to the proposed development and reflects the current design proposals submitted with the planning application.

Scope

- 7 The Ecological Appraisal seeks to achieve its purpose through the following Scope of Works:
 - Identify the presence of biodiversity features, including designated sites, notable habitats and legally protected and/or ecologically significant species, through a desk study of reliable web-based resources and data purchased from the local biodiversity centre;
 - Map the habitats present within the Site and immediately adjacent accessible land, following the UK Habitat Classification methodology, to establish the baseline environment, consider their importance and assess the potential supporting value for legally protected and/or ecologically significant species;
 - Identify the requirement for and scope of further targeted surveys required to accompany a planning application;
 - Appraise the effects of the proposed development upon valued biodiversity resources and identify mitigation measures required to negate or minimise adverse effects;
 - Outline measures proposed to enhance the biodiversity value of the Proposed Development and strategy for compliance with the mandatory and policy requirements and providing indicative post-development biodiversity net gain calculations.

Declaration of Conformity

- 8 The Ecological Appraisal has been carried out by Dylan O'Brien MSc, who holds 3 years of consultancy experience, and has been overseen and reviewed by Tom Hall MEnvSci CEnv MCIEEM. Tom has over 20 years' professional consultancy experience and holds an undergraduate master's degree in Environmental Science, full membership of the Chartered Institute of Ecology and Environmental Management (CIEEM) and Chartered Environmentalist status.
- 9 I can confirm that the information and assessment provided in this Ecological Appraisal is an accurate and realistic assessment of site conditions and potential supporting value, and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. Consideration has been given to best practice guidance in the completion of the appraisal, including British Standard 42020 and appropriate assessment guidance.



Tom Hall MEnvSci CEnv MCIEEM.

Period of Validity

- 10 In line with CIEEM guidelines¹, the reporting is considered to be valid for a period of 18 months from the completion of the survey on 9th July 2026, although the licence associated with the desk study data identifies a period of 12 months for use of the associated data. Following on from this, any reliance on the information may need to be subject to an update, including survey to assess the findings and data search to consider any new species information available.

LEGISLATIVE AND POLICY CONTEXT

Legislation

- 11 Legislative protection for biodiversity, afforded to a range of sites, habitats and species, is principally derived from the following statute and regulations:
- Schedule 7A of the Town and Country Planning Act 1990 (as amended)²;
 - Conservation of Habitats and Species Regulations 2017 (as amended)³;
 - Wildlife and Countryside Act 1981 (as amended)⁴;
 - Countryside and Rights of Way (CROW) Act 2000⁵; and,
 - Natural Environment and Rural Communities (NERC) Act 2006⁶.
- 12 Further details of the protection afforded by this legislation are provided in Appendix A, with the level of protection afforded to designated sites, habitats and/or species varying according to the sensitivity, rarity and scale at which they are considered valuable.

Planning Policy

- 13 National and local government provides guidance on the standards and expectations for development through adopted planning policy, with national policy and guidance typically cascading down to inform the shape of local planning policy. Planning policy will generally cover a wide variety of topics, including economic, social and environmental aspects, against which the merits of a development proposal can be considered. As a result, there are a number of planning policy documents that are relevant to the development proposal, which are identified below with key aspects of these in relation to biodiversity summarised in Appendix A:
- National Planning Policy Framework (NPPF)⁷;
 - Planning Practice Guidance⁸;
 - London Plan⁹;
 - Draft London Plan¹⁰;

¹ CIEEM (2019) Advice Note: On the lifespan of ecological reports and surveys. Chartered Institute of Ecology and Environmental Management, Winchester.

² The Town and Country Planning Act 1990 (as amended). His Majesty's Stationary Office (HMSO).

³ The Conservation of Habitats and Species Regulations 2017 (as amended). His Majesty's Stationary Office (HMSO).

⁴ The Wildlife and Countryside Act 1981 (as amended). His Majesty's Stationary Office (HMSO).

⁵ The Countryside and Rights of Way (CROW) Act 2000. His Majesty's Stationary Office (HMSO).

⁶ The Natural Environment and Rural Communities (NERC) Act 2006. His Majesty's Stationary Office (HMSO).

⁷ Ministry of Housing, Communities and Local Government (2026) National Planning Policy Framework. August 2026.

⁸ Ministry of Housing, Communities and Local Government (2016) Planning Practice Guidance. Last updated February 2024.

⁹ Greater London Authority (2021) The London Plan. The Spatial Development Strategy for Greater London, March 2021.

¹⁰ Greater London Authority (2026) Draft London Plan. The Spatial Development Strategy for Greater London, July 2026.

- Haringey's Local Plan Strategic Policies¹¹ and Development Management DPD¹²;
- Haringey's New Local Plan¹³;
- Tottenham Area Action Plan¹⁴; and,
- The Haringey Development Management DPD Supplementary Document¹⁵.

Ecological Initiatives

- 14** There are a number of ecological initiatives potentially relevant to the Site and surrounding area, these are discussed in full in Appendix A and comprise:

- UK Biodiversity Framework and Environmental Improvement Plan 2023¹⁶;
- London Biodiversity Action Plan¹⁷;
- London Local Nature Recovery Strategy¹⁸
- Haringey's Biodiversity Action Plan¹⁹;
- Haringey's Parks and Greenspaces Strategy²⁰; and,
- London's Living Landscape Initiative²¹.

METHODOLOGY

British Standard 42020: Biodiversity – Code of Practice for Planning and Development

- 15** British Standard (BS) 42020²² on biodiversity provides an industry standard for biodiversity assessment, reporting and decision making, ensuring high-quality ecological information is available to enable effective decision-making, legal and policy compliance, successful implementation of mitigation and enhancement measures and the achievement of desired outcomes. To achieve this, BS 42020 sets out a framework that seeks to: promote transparency and consistency in the quality and appropriateness of information; provide greater confidence to planning authorities and other regulatory bodies in the information they receive with which to make decisions; and, encourage proportionality in requirements and promote a good environmental legacy through development.
- 16** Key aspects in the delivery of ecological assessment for planning and development" include the following:

¹¹ London Borough of Haringey (2013) *Haringey's Local Plan Strategic Policies 2013-2026 (formerly the Core Strategy)*, March 2013.

¹² London Borough of Haringey (2017) *Haringey's Local Plan Development Management DPD*, July 2017.

¹³ London Borough of Haringey (2025) *The New Local Plan*. Accessible through <https://haringey.gov.uk/planning-building-control/planning/planning-policy/local-plan/new-local-plan-2025>

¹⁴ Haringey London Council. (2017) *Tottenham Area Action Plan* (July 2017).

¹⁵ Haringey London Council. (2017) *Development Management DPD* (July 2017)

¹⁶ Department for Environment, Food and Rural Affairs (2023) *Environmental Improvement Plan 2023. First Revision of the 25 Year Environment Plan*.

¹⁷ London Biodiversity Partnership (2007) *London Biodiversity Action Plan*. Access through www.gigl.org.uk

¹⁸ GLA (2026) *London Local Nature Recovery Strategy. Statement of Biodiversity Priorities*. March 2026.

¹⁹ Haringey Council (2022) *Biodiversity Action Plan. People Need Parks*. August 2022

²⁰ Haringey Council (2023) *Haringey's Parks and Greenspaces Strategy. People Need Parks*. August 2023

²¹ London Wildlife Trust (2014) *London's Living Landscapes. A recovery plan for nature*. London Wildlife Trust, London

²² British Standards Institute (2013) *British Standard 42020: Biodiversity – Code of Practice for Planning and Development*. BSI, London.

- collaborative approach between ecologists and landscape architects as part of an interdisciplinary team;
- proportionality, ensuring provision of adequate information appropriate to the environmental risk of the development and its location;
- objective professional judgement, clearly justified through documented reasoning;
- application of the mitigation hierarchy as a fundamental approach to decision making.

Zone of Influence

- 17 The Zone of Influence is defined by CIEEM guidance as *'the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities'*. As a result, the Zone of Influence will vary between projects and biodiversity features, and in most circumstances will extend beyond the site boundary.
- 18 In order to capture potentially relevant biodiversity features within the assessment, an appropriate geographical scale has been set across which the desk study and field survey will be completed, comprising the study area and survey area respectively.
- 19 The study area comprises the area over which the presence of biodiversity information is gathered to identify potential constraints to and opportunities for the development and establish an ecological context for the Site. As some designated sites, and their associated qualifying features, potentially hold greater sensitivity to impacts from development, the study area is considered across a varying geographic scale. All biodiversity features across a 2 km radius from the Site are identified through the desk study for consideration in the assessment where relevant, extending to 5 km for nationally designated sites and 10 km for internationally designated sites.
- 20 The survey area comprises the Site, identified by the red line boundary for planning, along with accessible land adjacent to the Site where applicable. This area is subject to a walkover survey to map habitats present and identify the presence of biodiversity features potentially impacted by the development proposals.

Desk Study

- 21 The ecological context of the site, based on the presence of ecological designations and local biodiversity records, has been established through an online search of information sources and geospatial data and a data request to the local biological records centre – Greenspace Information for Greater London (GiGL).
- 22 Information requested from the local biological records centre included statutory and non-statutory designated sites, notable habitats and legally protected and ecologically significant species. This has been supplemented by interrogation of the following publicly available data sources:
 - Aerial imagery from Google Earth;
 - Designated site and notable habitat geospatial information, published by Natural England;
 - Biodiversity Hotspots for Planning geospatial information, published by GiGL; and,
 - London Tree Map geospatial information, published by the Greater London Authority.

- 23 Due to the mobile nature of species, presence and distribution information will vary over time, and as a result, information obtained through the desk study for species has been restricted to the most recent records in the data from 2006 and onwards to ensure records are up-to-date and remain relevant. Records older than 20 years are generally of limited value in informing current baseline conditions unless supported by more recent evidence or the characteristics of the species/site indicate continued relevance. Date of nearest record is also accounted for however, there is no restriction on the date.

Field Survey

Habitat Survey

- 24 Habitats present within the survey area, comprising the site and immediately adjacent habitats, have been classified and mapped following the UK Habitat Classification methodology²³, a new comprehensive habitat classification system that was developed to provide greater consistency between applications and, through the combination of primary habitats and secondary codes enable clearer identification of habitat mosaics, management, origins and other environmental and species features associated with primary habitat types.
- 25 The methodology is suited to application through both remote-sensing observation and walkover survey mapping, or a combination of both, and is well suited to urban environments as the secondary codes allow for green infrastructure features to be identified and reflect their contribution to biodiversity potential.
- 26 The UK Habitat Classification system is hierarchical with the professional edition applied for the assessment requiring habitats to be identified to Level 4 where possible. Considering the scale of the development proposals and urban context of the Site, where habitats are often present at limited extent and in contrast to often dominant artificial surfaces, the fine-scale Minimum Mapping Unit (MMU) has been applied, comprising habitats > 25 m² and 5 m length for linear features.
- 27 An initial appraisal of the site, using existing site drawings, aerial photography and site images, has been undertaken to establish the habitats present on the Site in as much detail as possible. As the Site is principally urban in nature, many of the habitats are relatively common and principally fall within the u- urban and u1-built-up areas and gardens categories. Whilst some habitats can only be identified at a high level following this approach and require a walkover survey to accurately identify to Level 4, within the urban categories the distinction between Level 4 habitats, and for developed land Level 5 habitats, is straightforward and achievable.
- 28 The initial remote sensing appraisal has been followed up with a walkover survey to ensure the accuracy of the mapping, identify all habitats to Level 4, establish floral species lists for the habitats present and assess the potential for the habitats and any notable features present to support legally protected or ecologically significant species. All habitats have also been attributed relevant secondary codes, based on the findings of the walkover survey, to provide additional information on the presence of features and management activities.
- 29 In addition to the habitat mapping, habitat condition assessments for those habitats identified in Defra's Statutory Biodiversity Metric as requiring one have also been carried out in the walkover survey. For each habitat requiring a condition assessment, the criteria identified within the methodology²⁴ have been considered in turn with appropriate information recorded to confirm the status of each habitat parcel.

²³ UKHab Ltd (2023) *UK Habitat Classification Version 2.0* (at <https://www.ukhab.org>)

²⁴ Department for Environment, Food & Rural Affairs (2024) *The Statutory Biodiversity Metric. Technical Annex 1: Condition Assessment Sheets and Methodology*.

- 30 The walkover survey was carried out on 9th July 2026 by Dylan O'Brien MSc and Harriet Miles MSc, on a sunny dry day. Vegetation present was identified in accordance with Rose & O'Reilly (2006)²⁵.

Daytime Bat Walkover

- 31 The potential for the site to support bats has been considered in the ecological appraisal through the completion of a Daytime Bat Walkover in line with the latest best practice guidance²⁶. The assessment considers the suitability of the site to support bats, with structures and features assessed for their potential to support roosting bats and habitats assessed for their potential to provide commuting or foraging habitat. Habitat suitability is considered in line with the descriptions provided in Table 1.

Table 1 Guidelines for Assessing the Potential Suitability of the Site for Bats

Potential Suitability	Description for Roosting Habitats in Structures	Description for Potential Flight-Paths and Foraging Habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats, however a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

- 32 As trees do not fit into the categorisation above, the BCT Guidance provides the following suitability categories to be applied to them:

²⁵ Rose, F., & O'Reilly, C. (2006). *The wild flower key: How to identify wild flowers, trees and shrubs in Britain and Ireland* (Rev. & expanded ed.). Frederick Warne Books.

²⁶ Collins, J. (ed) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition). The Bat Conservation Trust, London.

- None – either no Potential Roost Features (PRFs) in the tree or highly unlikely to be any;
- FAR – Further Assessment Required to establish if PRFs are present in the tree; and,
- PRF – A tree with at least one PRF present.

Ground Level Tree Assessment

- 33** Following on from the daytime bat walkover survey, a Ground Level Tree Assessment (GLTA) was carried out for the trees adjacent to the site. The GLTA comprised an external inspection of the trees to consider their potential to support roosting bats in greater detail, in line with best practice guidance, and assigned a category according to BCT Guidance. Descriptions of potential access points and roosting places were recorded in the GLTA. Full details are included in the GLTA Survey Report, which is included in Appendix B.

Assessment Methodology

- 34** An important aspect of ecological appraisal is establishing which ecological features are important and warrant consideration, with CIEEM guidance on both Preliminary Ecological Appraisal²⁷ and Ecological Impact Assessment (EclA)²⁸ requiring the establishment of the likely importance of receptors present.
- 35** In determining importance, it is important to distinguish between the *biodiversity value* of a receptor and its *legal status*. Features of high biodiversity value may not necessarily attract legal protection and vice versa, for example a viable area of ancient woodland is likely to be considered of high biodiversity value even if it does not receive any formal statutory designation affording legislative protection.
- 36** In accordance with CIEEM's EclA guidance, each biodiversity feature has been assessed as important, or potentially important, within the following geographical frame of reference:
- International – e.g. existing or warranting designation as a Special Protection Area (SPA) and/or of significant conservation status for Europe;
 - National – e.g. existing or warranting designation as a Site of Special Scientific Interest (SSSI) and/or of significant conservation status for England;
 - Metropolitan – e.g. existing or warranting designation as a Site of Metropolitan Importance for Nature Conservation (Metropolitan SINC) and/or of significant conservation status for Greater London;
 - Borough – e.g. existing or warranting designation as a Site of Borough Importance for Nature Conservation (Borough SINC) and/or of significant conservation status for the London Borough of Haringey;
 - Local – e.g. existing or warranting designation as a Site of Local Importance for Nature Conservation (Local SINC) and/or of significant conservation status within a local context (e.g. within 1 km of the site);
 - Within the immediate survey area only – e.g. habitats or species populations of significant conservation status within the Site and immediate surrounding lands
 - Negligible – e.g. habitats or species whose presence does not contribute to the local biodiversity resource or has negative effects on local biodiversity (e.g. invasive species).

²⁷ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal*, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

²⁸ CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.2*. Chartered Institute of Ecology and Environmental Management, Winchester.

Biodiversity Net Gain Assessment

Principles of Biodiversity Net Gain

- 37 The application of the Mitigation Hierarchy is a fundamental element of delivering BNG, ensuring development proposals consider the baseline environment and opportunities to retain habitats where possible and not use the process to justify losses. This requirement is set out in British Standard (BS) 8683²⁹, which states that development should:
- *‘first avoid impacts on biodiversity, by identifying all possible avoidance measures especially to avoid impacts on irreplaceable and vulnerable habitats, statutory and non-statutory designated sites and biodiversity of high conservation value’;*
 - *‘then be applied to minimise impacts, before restoring damaged habitats and other ecological features’;*
 - *‘then, as a last resort, offsetting any residual impacts’.*
- 38 BS 8683 also establishes the ‘like-for-like or better’ principle as a fundamental element of BNG, whereby a net gain is achieved by ‘restoring affected biodiversity or offsetting residual biodiversity loss with the same type of biodiversity (like-for-like) or with a type that is of higher conservation value’. This principle prevents replacement of high value habitat with a greater extent of habitat of lower conservation value.
- 39 The Construction Industry Research and Information Association (CIRIA), in partnership with the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA), have produced guidance on biodiversity net gain³⁰, setting out good practice principles for the delivery of BNG through development. These principles and how they have been addressed through the assessment are identified in Appendix C.

Exemption

- 40 The Proposed Development does not meet any of the exemption criteria set out within the Biodiversity Gain Requirements (Exemptions) Regulations 2024, and therefore it is expected that the mandatory BNG requirements will be required as a condition of planning permission.

Ecological Significance

- 41 Local Nature Recovery Strategies (LNRSs) provide a new system of spatial biodiversity strategies for England, targeting actions in locations where they are most needed and where they provide the best environmental outcomes and linking national efforts to reverse the decline in biodiversity.

²⁹ BSI (2021) British Standard 8683:2021 Process for designing and implementing Biodiversity Net Gain – Specification. British Standards Institute, London.

³⁰ CIRIA (2019) Biodiversity net gain. Good practice principles for development. A practical guide. CIRIA Report C776a. Construction Industry Research and Information Association, London.

- 42 The LNRS for London³¹, published by the Greater London Authority (GLA) in March 2026, sets out the priorities for biodiversity recovery or enhancement and proposals for potential measures. The LNRS sets out 6 principles, 30 biodiversity priorities with 22 primary measures and 37 species-specific measures. The biodiversity priorities relating to the urban environment include the unmapped measure to *'restore, expand, create and connect spaces for nature in more urban environments. This particularly includes nature-positive features in/on buildings, and well-designed, nature friendly lighting'* and in relation to trees and hedgerows to *'expand hedgerow and tree cover outside of woodlands, especially on streets in areas of low canopy cover and habitat connectivity, and improve resilience of existing tree populations and hedgerows'*
- 43 The LNRS does not identify the Site as having potential for nature recovery for a particular LNRS priority nor identify the Site as being of particular importance for biodiversity.

Approach

- 44 The BNG assessment follows Defra's Statutory Biodiversity Metric, an auditing and accounting tool for biodiversity which comprises the assessment methodology required to demonstrate compliance with the mandatory BNG requirement through the Environment Act 2021. The BNG assessment has been completed using the Statutory Biodiversity Metric calculator³², in line with the accompanying User Guide³³ and associated information within the Technical Annex³⁴.
- 45 In line with the PPG on Biodiversity Net Gain, outlined in Appendix A, as the mandatory requirement for BNG is a condition to planning, the information required at the planning application stage is principally associated with the establishment of the baseline. However, in line with Paragraphs 013 and 014 of the PPG, additional information is provided to demonstrate how the proposals will deliver a policy and legally compliant net gain for biodiversity. As a result, the BNG assessment is split into two parts, with the post-development position presented as indicative only at this stage, ahead of the final statutory Biodiversity Gain Plan to be submitted post-permission if planning permission is granted.

Pre-Development

- 46 The ecological value of the baseline habitats has been established from the findings of the walkover survey and habitat mapping, with the extent of habitat identified using GIS and, where required, the associated condition score identified in the walkover survey for each habitat or habitat parcel. The only exception for this is the extent of urban trees, for which the tree helper tool within the metric has been used to establish the associated habitat area. This is based on the size classification of the tree, using its Diameter at Breast Height (DBH).
- 47 Each habitat/habitat parcel has been assigned a 'Strategic Significance', in line with the requirements identified in the User Guide and outlined in Table 2.

³¹ Greater London Authority (2026) London Local Nature Recovery Strategy. March 2026.

³² Department for Environment, Food & Rural Affairs (2025) The Statutory Biodiversity Metric v1.0.4. July 2025.

³³ Department for Environment, Food & Rural Affairs (2025) The Statutory Biodiversity Metric. User Guide. July 2025.

³⁴ Department for Environment, Food & Rural Affairs (2025) The Statutory Biodiversity Metric. Technical Annex 1: Condition Assessment Sheets and Methodology v1.0.2. July 2025.

Table 2 Strategic Significance Criteria Considerations

Category	Criteria where LNRS is Published
High Strategic Significance	This category can be applied when: - The location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and, - The intervention is consistent with the potential measure proposed for that location. If the project delivers the mapped measure set out in the LNRS the assessment should: - record the strategic significance as low in the baseline; - record the strategic significance as high in post-intervention sheets; - record that you have applied the published LNRS.
Medium Strategic Significance	This category cannot be applied.
Low Strategic Significance	Where the definitions for high strategic significance are not met. Even if the project is in an area mapped with a potential measure, if it does not deliver the specific actions outlined for your location you should record strategic significance as low.

- 48 As the site is not identified within the LNRS to provide an area of biodiversity importance, the baseline is considered to be of low strategic significance.

Post-Development

- 49 The post-development scenario, based on the proposed landscape drawings (AHCF-BOSK-ZZ-RF-DR-L-1000-P08), has been provided as an indication to the strategy on how the Proposed Development can deliver a BNG thereby complying with the associated policy and legislative requirements.
- 50 The habitat types and extents have been identified based on the landscape information, applying the precautionary principle where uncertainty exists, with the extent measured from the associated areas on the drawings. Where a habitat condition is required, appropriate consideration has been given to the various criteria that apply and recommendations made to ensure the condition assessed can be achieved. In line with the assessment guidelines, trees proposed for installation have been included as small trees, unless appropriate information can be provided to justify the medium-size class.
- 51 In line with Table 2, as the Site does not contain any mapped potential measures that are delivered by the Proposed Development the habitats present are considered to be of low strategic significance.

Limitations

- 52 The Ecological Appraisal draws on a number of sources and methods on which the biodiversity value/potential of the Site is derived, following best practice guidance and utilising up-to-date information, and thus is not considered to give rise to any significant limitations as a result. However, further bat survey work is required to complete the assessment of certain ecological effects.
- 53 Ecological surveys inherently provide a snapshot in time, and conditions will change over time that will alter the conditions associated with the features/potential features present or introduce new features. The assessment has been completed at an appropriate time and within suitable timescales, and whilst some aspects may be missed, for example as a result of flowering periods, the information gathered is sufficient to assess the value and associated risks. The mitigation also takes into account the potential for the Site to change, with recommendations made to address this potential and reference given to CIEEM guidance in relation to the period of validity for surveys.

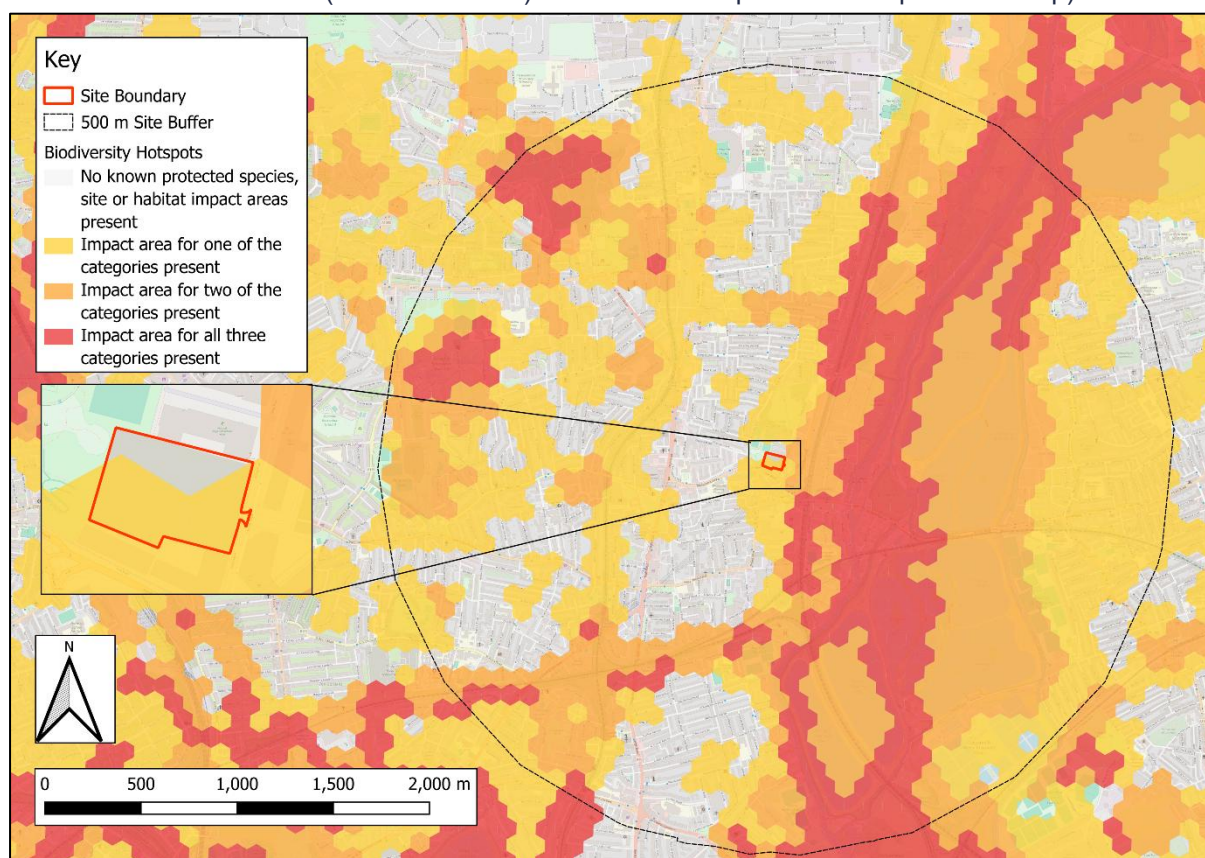
BASELINE

Desk Study

Biodiversity Hotspots

- 54 The Biodiversity Hotspots for Planning dataset³⁵, created by Greenspace Information for Greater London (GiGL), identifies areas, where data is available, that have potential for impacts on biodiversity and are likely to be relevant to local planning decisions. Hotspot areas indicate a detected presence of sensitive biodiversity that could potentially be affected by development.
- 55 The majority of the site falls within an area identified with one impact categories present (for either species, sites or habitats), with only a small part of the Site falling within an area with no impact category present, as identified in Figure 2. Whilst this does not confirm the presence or absence of biodiversity within the Site, it provides context as to the biodiversity potential of the site.

Figure 2 Biodiversity Hotspots for Planning around the Application Site (Map displays GiGL data (November 2019) and contains map data from OpenStreetMap)



³⁵ Greenspace Information for Greater London (2019) *Biodiversity Hotspots for Planning*. November 2019.

Designated Sites

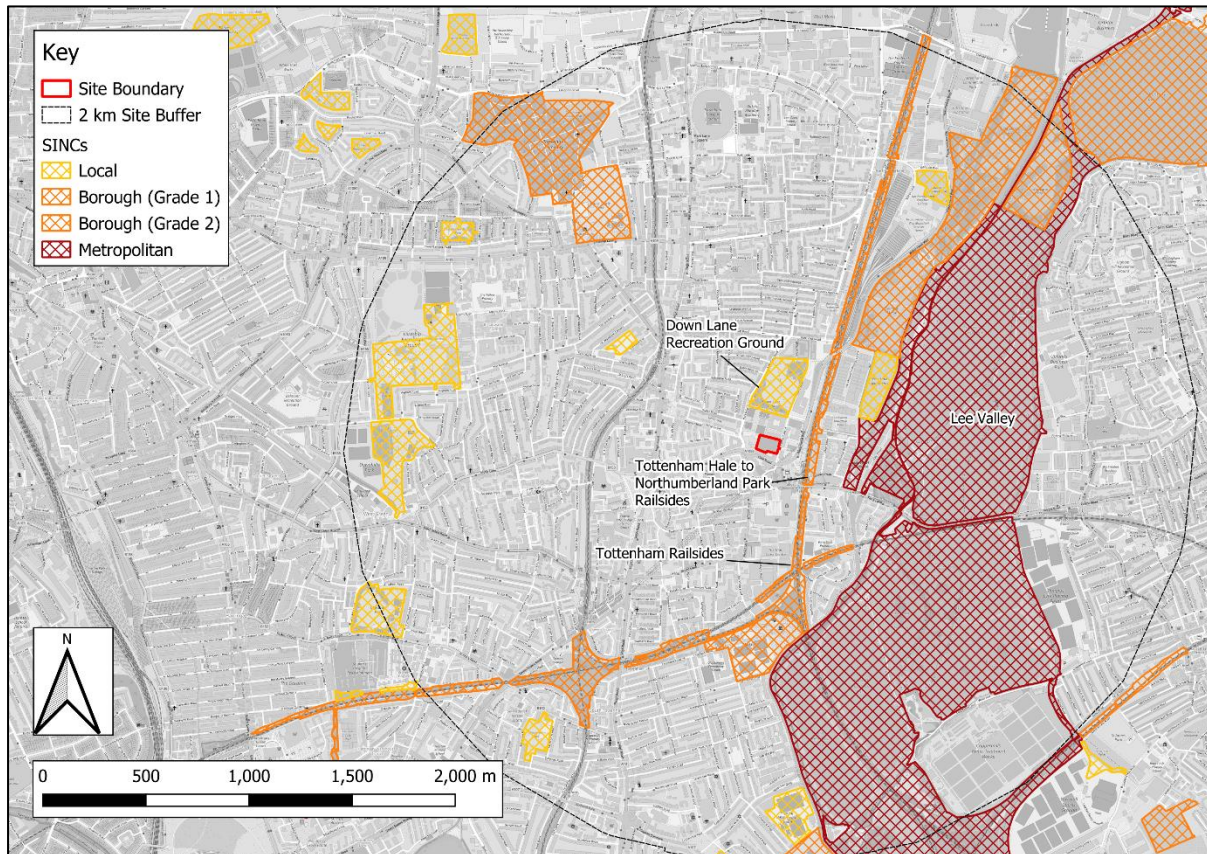
- 56 The study area includes 8 statutory designated sites and 21 non-statutory designated sites. The designated sites present, and their proximity to the Proposed Development, are identified in Table 3 with the location of the non-statutory designated sites identified in Figure 3 and statutory designated sites identified in Figure 4. Those sites present in Figure 4 but not labelled do not fall within the relevant study area for that site.

Table 3 Designated Sites in the Study Area

Site	Area (ha)	Proximity to Site
Special Area of Conservation		
Epping Forest	1,630.74	4.5 km east
Special Protection Area		
Lee Valley	451.29	575 m east
Ramsar		
Lee Valley	447.87	575 m east
Site of Special Scientific Interest		
Walthamstow Reservoirs SSSI	179.50	575 m east
Walthamstow Marshes SSSI	36.70	1.7 km south
Chingford Reservoirs SSSI	128.40	3.7 km north-east
Epping Forest SSSI	110.80	4.5 km east
Local Nature Reserve		
Springfield Park	13.60	1.8 km south
Site of Metropolitan Importance for Nature Conservation		
Lea Valley	943.36	360 m east
Sites of Borough Importance for Nature Conservation		
Tottenham Hale to Northumberland Park Railsides	7.58	145 m east
Tottenham Railsides	18.22	215 m south-east
Tottenham Marshes (EVS Borough Importance Grade I)	31.53	535 m north-east
Markfield Recreation Ground	7.83	770 m south
Tottenham Cemetery and Bruce Castle Park	29.58	1.1 km north-west
Tottenham Marshes East	9.41	1.5 km north-east
Springfield Park	13.85	1.8 km south
Banbury Reservoir	55.22	2.0 km north-east
Chingford to Walthamstow Railsides	15.47	2.0 km south-east
Sites of Local Importance for Nature Conservation		
Down Lane Recreation Ground	5.00	115 m north
Allotments in Haringey	5.01	365 m east
Bruce Grove Wood	0.78	745 m north-west
Lordship Lane Recreation Ground	12.12	1.5 km west
Downhills Park	6.59	1.6 km west
Spring Hill Playing Fields	3.77	1.6 km south
Paignton Road Open Space	1.98	1.6 km south-west
Tower Gardens	1.33	1.7 km north-west
Chestnuts Recreation Ground	5.16	1.8 km south-west

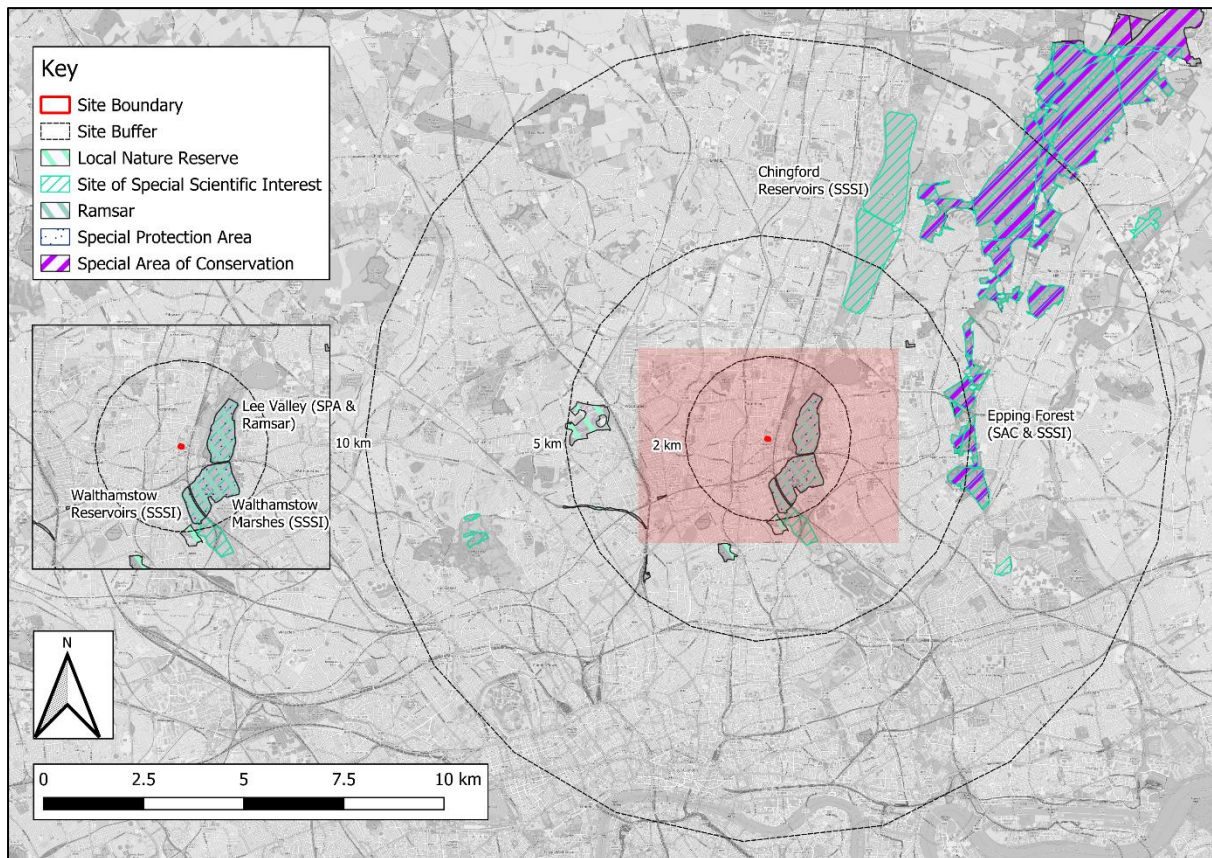
Site	Area (ha)	Proximity to Site
Clapton Common Pond	0.32	1.9 km south
St Anne's Hospital Wood	0.71	2.0 km south-west

Figure 3 Non-Statutory Designated Sites within the Study Area (Contains public sector information licensed under the Open Government Licence v3.0 and map data from OpenStreetMap)



- 57** Down Lane Recreation Ground Local SINC is located approximately 115 m north of the site and comprises a park with substantial areas of native woodland, scrub planting, and meadows. The Local SINC supports habitats including amenity grassland, scattered trees, and semi-improved neutral grassland, featuring plots of native birch, hazel, and wild cherry. The reduction in mowing has allowed native wildflowers to flourish, providing a naturalised habitat area within an otherwise urban setting.
- 58** Tottenham Hale to Northumberland Park Railsides Borough SINC is located approximately 145 m east of the Site and comprises a long stretch of vegetated railway embankments containing a diverse range of habitats. The Borough SINC supports a mosaic of rough grassland, patches of tall herbs, and scrub consisting of bramble, willows, and buddleia, alongside scattered silver birch and mature sycamore woodland. Notably, the rare hybrid plant "Wurzell's wormwood" (*Artemisia vulgaris x verlotiorum*) is abundant around Northumberland Park station.
- 59** Tottenham Railsides Borough SINC is located approximately 215m east of the site and comprises triangular segments of railside land that function as an important wildlife corridor connecting the Lea Valley into the built-up parts of the borough. The Borough SINC supports a substantial area of relatively undisturbed habitat, including sycamore woodland, rough grassland, tall herbs, and a pond. It also features willow woodland, which is a particularly rare habitat type within London. Naturalize

Figure 4 Statutory Designated Sites within the Study Area (Contains public sector information licensed under the Open Government Licence v3.0 and map data from OpenStreetMap)



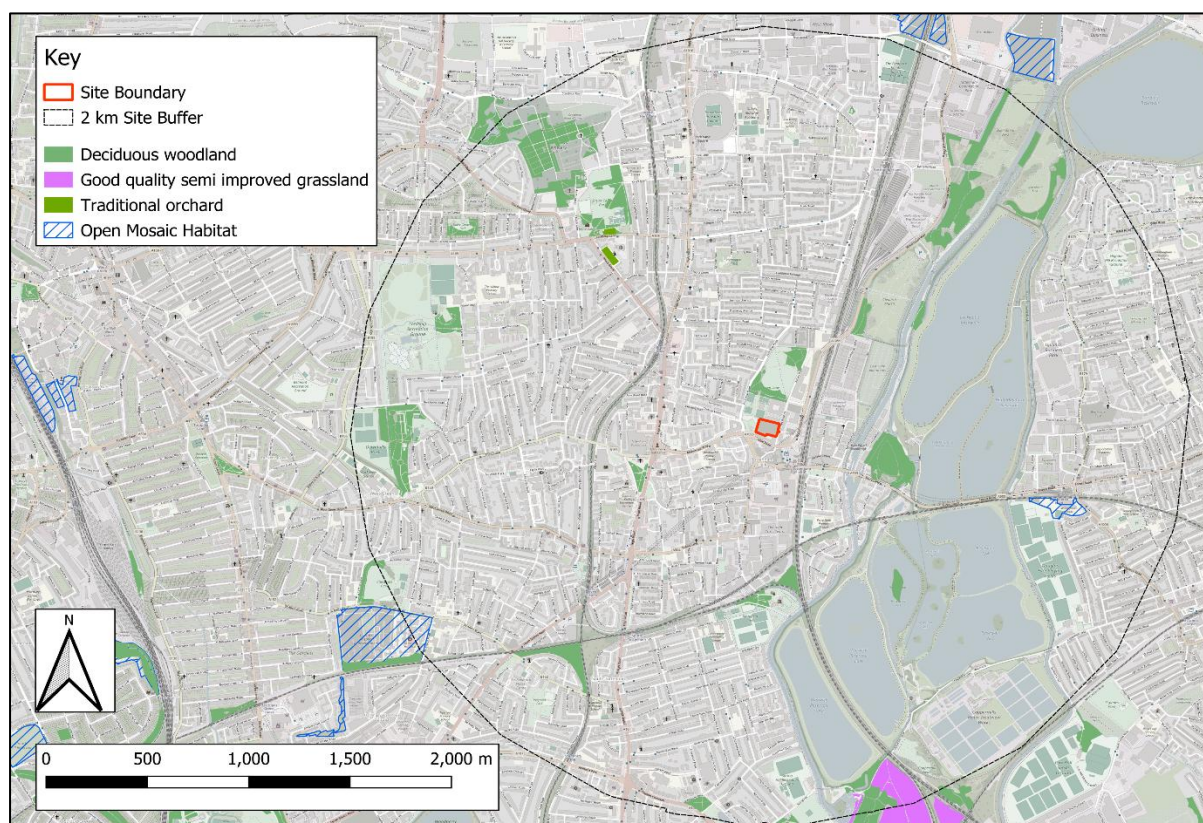
- 60** The Lee Valley SPA comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats. The site qualifies as an SPA due to the presence of internationally important numbers of wintering bittern (*Botaurus stellaris*), shoveler (*Anas clypeata*), and gadwall (*Anas strepera*). While not qualifying features, it is of note that the site also supports nationally important numbers of cormorant (*Phalacrocorax carbo*), great crested grebe (*Podiceps cristatus*), tufted duck (*Aythya fuligula*), pochard (*Aythya ferina*), and grey heron (*Ardea cinerea*).
- 61** The Lee Valley also qualifies as a Ramsar site as it supports the nationally scarce plant species whorled watermilfoil (*Myriophyllum verticillatum*), the rare or vulnerable invertebrate *Micronecta minutissima* (a waterboatman), and internationally important populations of overwintering gadwall and autumn population of shoveler.
- 62** Walthamstow Reservoirs SSSI is designated as the reservoirs contain one of the country's major heronries and a particularly large concentration of breeding wildfowl. They are also an important gathering area for moulting tufted duck and in winter attract nationally significant populations of wildfowl and other wetland bird species including great crested grebe, pochard, Eurasian coot (*Fulica atra*), yellow wagtail (*Motacilla flava*), sedge warbler (*Acrocephalus schoenobaenus*) and reed warbler (*Acrocephalus scirpaceus*). Others such as shoveler and common tern (*Sterna hirundo*) are often present and nest in some years.

- 63 Walthamstow Marshes SSSI is located approximately 1.7 km south of the site and comprises one of the last remaining examples of semi-natural floodplain wetland in Greater London. The site supports a diverse mix of neutral grasslands, sedge marsh, reed swamp, sallow scrub, and an extensive network of ditches. Notable flora indicative of the site's ancient grassland origins includes adder's tongue fern (*Ophioglossum vulgatum*) and the hybrid 'graceful' sedge (*Carex x subgracilis*). The marshes provide vital habitat for invertebrates, including the Essex skipper butterfly (*Thymelicus lineola*), *Volucella inanis*, and Roesel's bush cricket, as well as a breeding bird community of reed bunting, reed, sedge, and willow warblers.
- 64 Epping Forest qualifies as a Special Area of Conservation (SAC) as a result of the presence of the Annex I habitat Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrub layer (*Quercion roburi-petraeae* or *Illici-Fagenion*) and the Annex II species stag beetle (*Lucanus cervus*). The site also supports northern Atlantic wet heaths with *Erica tetralix* and European dry heaths as qualifying features but not a primary reason for selection of the site.

Notable Habitats

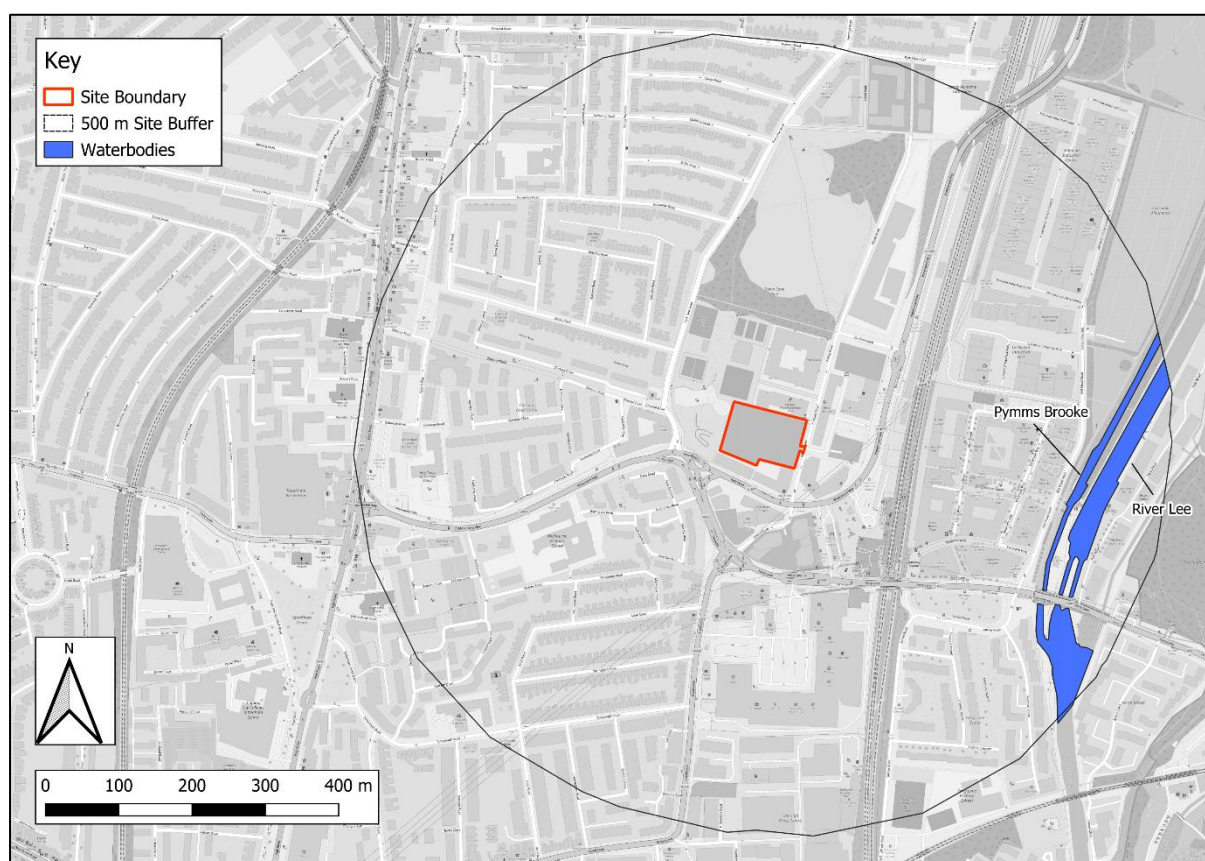
- 65 The study area does not include any areas of ancient woodland; however it does include four UK BAP Priority habitats, which are deciduous woodland, good quality semi-improved grassland, traditional orchard and open mosaic habitats present as identified in Figure 5.

Figure 5 Notable Habitats present within Study Area (Contains public sector information licensed under the Open Government Licence v3.0 and map data from OpenStreetMap)



- 66 Deciduous woodland has the greatest extent within the study area, with the closest area of the habitat approximately 115 meters to the north of the Site in Down Lane Park. Good quality semi-improved grassland is present only in Walthamstow Marshes approximately 1.8 km to the south of the site whilst traditional orchard is present in one location approximately 1 km to the north-west. Open mosaic habitat is present in two areas, the closest being approximately 1.2 km to the east of the site, although this is based on a dataset that does not reflect the current situation and review of aerial imagery suggests that both areas have been developed and are no longer representative of the habitat.
- 67 A search of the area up to 500 m from the site did not identify any standing waterbodies, but did identify two watercourses as identified in Figure 6. Pymmes Brook, a tributary of the River Lea, and the River Lea are located approximately 370 m east of the Site. Pymmes Brook is a heavily modified watercourse of moderate ecological status and the River Lea is a heavily modified watercourse of poor ecological status upstream of the Pymmes Brook confluence and bad ecological status, identified to be associated with the fish community, downstream.

Figure 6 **Waterbodies Within 500 meters of the Site** (Contains public sector information licensed under the Open Government Licence v3.0 and map data from OpenStreetMap)



Legally Protected and Ecologically Significant Species

- 68 The desk study information returned by GiGL identified the presence of a number of ecologically significant and legally protected species within the study area. However, as the study area includes a wide variety of habitat types, including parks and gardens and railsides, rivers, large waterbodies alongside densely urbanised areas, the information has been reviewed to identify the species that have potential to be present within the site and surrounding area to help focus the background context to the site.

- 69 The desk study identified a total of 106 species of bird within the study area that are identified as specially protected or ecologically significant, either as being of conservation concern (Red or Amber listed), local species of conservation concern or identified as a BAP priority species. The species of potential note for the Proposed Development, based on proximity to the site, most recent record and typical habitat requirements, are identified in Table 4.

Table 4 Bird Species Identified in the Study Area Potentially Relevant to the Site

Species		Most Recent Record	Date of Closest Record	Closest Record
<i>Larus argentatus</i>	Herring gull	2025	2019	90 m south-west
<i>Curruca curruca</i>	Lesser whitethroat	2008	2003	105 m south-east
<i>Sturnus vulgaris</i>	Starling	2026	2024	130 m south-east
<i>Apus apus</i>	Swift	2025	2024	135 m east
<i>Passer domesticus</i>	House sparrow	2026	2001	145 m north-west
<i>Egretta garzetta</i>	Little egret	2025	2023	275 m east
<i>Larus fuscus</i>	Lesser black-backed gull	2012	2012	390 m south-east
<i>Prunella modularis</i>	Dunnock	2025	2012	390 m south-east
<i>Turdus iliacus</i>	Redwing	2024	2012	390 m south-east
<i>Turdus philomelos</i>	Song thrush	2013	2012	390 m south-east
<i>Turdus pilaris</i>	Fieldfare	2016	2012	390 m south-east
<i>Turdus viscivorus</i>	Mistle thrush	2025	2012	390 m south-east
<i>Motacilla cinerea</i>	Grey wagtail	2025	2003	470 m east
<i>Acanthis flammea</i>	Redpoll	2023	2023	545 m south-east
<i>Alauda arvensis</i>	Skylark	2023	2023	545 m south-east
<i>Asio flammeus</i>	Short-eared owl	2023	2023	545 m south-east
<i>Chloris chloris</i>	Greenfinch	2024	2023	545 m south-east
<i>Delichon urbicum</i>	House martin	2023	2023	545 m south-east
<i>Emberiza citrinella</i>	Yellowhammer	2022	2022	545 m south-east
<i>Ichthyaetus melanocephalus</i>	Mediterranean gull	2023	2023	545 m south-east
<i>Linaria cannabina</i>	Linnet	2023	2023	545 m south-east
<i>Anthus trivialis</i>	Tree pipit	2021	2021	905 m south-east
<i>Milvus migrans</i>	Black kite	2013	2013	1.1 km south-east
<i>Phoenicurus ochruros</i>	Black redstart	2014	2010	1.1 km south-east
<i>Cettia cetti</i>	Cetti's warbler	2023	2023	Within 2 km
<i>Coccothraustes coccothraustes</i>	Hawfinch	2021	2021	Within 2 km
<i>Falco peregrinus</i>	Peregrine	2023	2023	Within 2 km
<i>Falco subbuteo</i>	Hobby	2020	2020	Within 2 km
<i>Ficedula hypoleuca</i>	Pied flycatcher	2022	2022	Within 2 km
<i>Passer montanus</i>	Tree sparrow	2022	2022	Within 2 km
<i>Strix aluco</i>	Tawny owl	2022	2022	Within 2 km

- 70 The information identified a total of 18 species of mammal that are identified as specially protected or ecologically significant. The species of potential note for the Proposed Development, based on proximity to the site, most recent record and typical habitat requirements, are identified in Table 5.

Table 5 Mammal Species Identified in the Study Area Potentially Relevant to the Site

Species		Most Recent Record	Date of Closest Record	Closest Record
<i>Erinaceus europaeus</i>	Hedgehog	2025	2012	390 m south-east
<i>Pipistrellus pipistrellus</i>	Pipistrelle	2021	2012	390 m south-east
<i>Pipistrellus pygmaeus</i>	Soprano pipistrelle	2017	2012	390 m south-east
<i>Nyctalus noctula</i>	Noctule	2018	1986	500 m south-east
<i>Eptesicus serotinus</i>	Serotine	2009	2009	545 m east
<i>Myotis daubentonii</i>	Daubenton's bat	2024	2024	585 m north-east
<i>Pipistrellus nathusii</i>	Nathusius's pipistrelle	2017	2017	905 m south-east
<i>Nyctalus leisleri</i>	Leisler's bat	2018	2017	1.1 km north-east
<i>Myotis mystacinus</i>	Whiskered bat	2017	2017	1.5 km south-west
<i>Plecotus auritus</i>	Brown long-eared bat	2017	2017	1.5 km south-west
<i>Meles meles</i>	Badger	2017	2017	Within 2 km
<i>Lepus europaeus</i>	Brown hare	2017	2017	Within 2 km

- 71 The desk study data also identified the presence of 2 species of amphibian, 28 species of higher plant, 2 species of reptile and 56 species of invertebrate. The species of potential note for the Proposed Development, based on proximity to the site, most recent record and typical habitat requirements, are identified in Table 6.

Table 6 Other Species Identified in the Study Area Potentially Relevant to the Site

Species		Most Recent Record	Date of Closest Record	Closest Record
<i>Tilia platyphyllos</i>	Large-leaved Lime	2023	2022	60 m south-west
<i>Festuca longifolia</i>	Blue fescue	2009	2009	170 m south
<i>Ochlodes sylvanus</i>	Large skipper	2014	2006	220 m north-east
<i>Timandra comae</i>	Blood-vein	2006	2006	220 m north-east
<i>Tyria jacobaeae</i>	Cinnabar	2024	2006	220 m north-east
<i>Hylaeus signatus</i>	Large yellow-face bee	2006	2006	220 m north-east
<i>Lasioglossum malachurum</i>	Sharp-collared furrow bee	2006	2006	220 m north-east
<i>Nomada fucata</i>	Painted nomad bee	2006	2006	220 m north-east
<i>Euplagia quadripunctaria</i>	Jersey tiger	2025	2024	380 m north-west
<i>Natrix helvetica</i>	Grass snake	2025	2012	390 m south-east
<i>Helix (Helix) pomatia</i>	Roman snail	2012	2012	390 m south-east
<i>Blitum bonus-henricus</i>	Good-king-henry	2012	2012	390 m south-east
<i>Hyacinthoides non-scripta</i>	Bluebell	2018	2012	390 m south-east
<i>Nepeta cataria</i>	Cat-mint	2012	2012	390 m south-east
<i>Poa infirma</i>	Early meadow-grass	2012	2012	390 m south-east
<i>Nemophora fasciella</i>	Horehound long-horn	2015	2012	460 m east

Species		Most Recent Record	Date of Closest Record	Closest Record
<i>Rana temporaria</i>	Common frog	2025	2025	460 m south-east
<i>Coenonympha pamphilus</i>	Small heath	2025	2024	525 m south-east
<i>Bombus humilis</i>	Brown-banded carder bee	2025	2022	525 m south-east
<i>Thymelicus sylvestris</i>	Small skipper	2025	2021	595 m east
<i>Aeshna isoceles</i>	Norfolk aeshna	2025	2025	655 m east
<i>Arctia caja</i>	Garden tiger	2012	2012	825 m north-east
<i>Lucanus cervus</i>	Stag beetle	2023	2001	920 m west
<i>Anguis fragilis</i>	Slow-worm	2023	2023	1.1 km south-west
<i>Bufo bufo</i>	Common toad	2017	2011	1.8 km west

72 In addition to the legally protected and ecologically significant species identified in the GiGL data, the desk study identifies the presence of a number of species identified as invasive through national legislation or locally by the London Invasive Species Initiative (LISI). A total of 52 invasive species were identified, with those of potential relevance to the site identified in Table 7.

Table 7 Invasive Species Identified in the Study Area Potentially Relevant to the Site

Species		LISI Category ³⁶	Most Recent Record
<i>Psittacula krameri</i>	Ring-necked parakeet	4	2025
<i>Thaumetopoea processionea</i>	Oak processionary	2	2023
<i>Ailanthus altissima</i>	Tree-of-heaven	3	2023
<i>Allium paradoxum</i>	Few-flowered garlic	2	2007
<i>Allium triquetrum</i>	Three-cornered garlic	4	2024
<i>Buddleja davidii</i>	Butterfly-bush	3	2026
<i>Cotoneaster dammeri</i>	Bearberry cotoneaster	2	2012
<i>Cotoneaster franchetii</i>	Franchet's cotoneaster	2	2012
<i>Cotoneaster frigidus</i>	Tree cotoneaster	2	2022
<i>Cotoneaster watereri</i>	Waterer's cotoneaster	2	2012
<i>Cotoneaster horizontalis</i>	Wall cotoneaster	2	2017
<i>Cotoneaster hurusawaianus</i>	Hurusawa's cotoneaster	2	2025
<i>Cotoneaster salicifolius</i>	Willow-leaved cotoneaster	2	2022
<i>Cotoneaster simonsii</i>	Himalayan cotoneaster	2	2009
<i>Crocsmia crocosmiiflora</i>	Montbretia	2	2009
<i>Galega officinalis</i>	Goat's-rue	4	2024
<i>Galinsoga quadriradiata</i>	Shaggy soldier	3	2024
<i>Heracleum mantegazzianum</i>	Giant hogweed	3	2023
<i>Hyacinthoides hispanica</i>	Spanish bluebell	4	2024

³⁶ LISI 2 - species of high impact or concern present at specific sites; LISI 3 - species of high impact or concern which are widespread in London; LISI 4 - Species which are widespread and eradication is not feasible; LISI 5 - species with insufficient data or evidence; LISI 6 - Species that were not currently considered to pose a threat or have the potential to cause problems in London.

Species		LSI Category ³⁶	Most Recent Record
<i>Hyacinthoides massartiana</i>	Bluebell	4	2012
<i>Ilex altaclerensis</i>	Highclere holly	5	2022
<i>Impatiens capensis</i>	Orange balsam	2	2021
<i>Impatiens glandulifera</i>	Himalayan balsam	3	2023
<i>Prunus laurocerasus</i>	Cherry laurel	3	2022
<i>Quercus cerris</i>	Turkey oak	5	2026
<i>Quercus ilex</i>	Evergreen oak	5	2026
<i>Fallopia japonica</i>	Japanese knotweed	3	2024
<i>Robinia pseudoacacia</i>	False-acacia	4	2024
<i>Smyrniolum perfoliatum</i>	Perfoliate Alexanders	2	2010
<i>Symphoricarpos albus</i>	Snowberry	2	2021

Field Survey

Habitats

- 73** The following sections describe the habitat conditions that were identified in the field survey area according to the primary habitat type present in line with the UK Habitat Classification definitions and following CIEEM best practice guidance. The habitat descriptions should be read in conjunction with the UK Habitat Classification survey map, see Figure 7, and site photographs, see Appendix D.

Figure 7 UK Habitat Classification Map (contains map data form Open Street Map)



u1 Built-Up Areas and Gardens

- 74** The majority of the Site supports areas of unmanaged and neglected ground with ruderal/ephemeral habitat (Secondary Code 81) and vacant or derelict land (Secondary Code 82) that are best classified under the primary habitat of u1 built-up areas and gardens within the UK Habitat Classification. This habitat type is primarily distributed across the south-eastern and north-western sections of the site and contain a relatively diverse assemblage of opportunistic and ruderal floral species typical of recently disturbed land that has been left unmanaged.
- 75** The dominant flora recorded within these habitat parcels includes tall fleabane (*Erigeron sumatrensis*), common yarrow (*Achillea millefolium*), goat willow (*Salix caprea*), great willowherb (*Epilobium hirsutum*) and butterfly bush (*Buddleja davidii*). Additionally, a wide variety of other floral species was noted during the survey, comprising common poppy (*Papaver rhoeas*), bristly oxtongue (*Helminthotheca echinoides*), valerian (*Valeriana officinalis*), coltsfoot (*Tussilago farfara*), milk thistle (*Silybum marianum*), fern-leaf yarrow (*Achillea filipendulina*), Oxford ragwort (*Senecio squalidus*), herb-robert (*Geranium robertianum*), white clover (*Trifolium repens*), spear thistle (*Cirsium vulgare*), spear-leaved orache (*Atriplex prostrata*), foxglove (*Digitalis purpurea*), elder (*Sambucus nigra*), common nettle (*Urtica dioica*), dandelion (*Taraxacum officinale* agg.), climbing nightshade (*Solanum dulcamara*), woolly mullein (*Verbascum thapsus*), mallow (*Malva* spp.), fireweed (*Chamaenerion angustifolium*), wall barley (*Hordeum murinum*), pale toadflax (*Linaria repens*), hoary mustard (*Hirschfeldia incana*), vervain (*Verbena officinalis*), hoary plantain (*Plantago media*) and field bindweed (*Convolvulus arvensis*). The habitat also supports small patches of bare ground characterised by a loose gravel substrate with sparse, patchy growth of Yorkshire-fog (*Holcus lanatus*), perennial rye-grass (*Lolium perenne*) and wall barley.
- 76** The habitat parcels were evaluated against the criteria for the UK Priority Habitat type Open Mosaic Habitats on Previously Developed Land. Whilst the baseline conditions satisfy some of the criteria of the priority habitat definition, including having a documented history of disturbance, supporting early successional communities and featuring areas of loose, bare substrate, the habitats do not show the spatial variation within 0.25 ha that is typical in open mosaic habitat and instead forming a series of distinct and identifiable habitats. Consequently, these areas do not satisfy the priority habitat classification.
- 77** While the ruderal/ephemeral habitat contains diverse vegetation and structural complexity, the habitat is relatively common in the urban environment and does not form part of any priority habitat. The habitat on the Site provides some potential to support faunal species. As a result, the habitat is considered to be of biodiversity value within the **immediate survey area only**.
- 78** A condition assessment for this habitat is required as part of the Biodiversity Net Gain assessment, the results of which are provided in Table 8.

Table 8 Ruderal/Ephemeral Vegetation Condition Assessment

	Criteria	Pass	Comment
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area	Yes	The habitats contain a wide variety of species creating a varied structural layer. The habitat also has areas of bare substrate and patchy grass, further varying the habitat structure.
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year	Yes	Many of the species have a beneficial value to wildlife, with many flowering species present. A high diversity of invertebrates was observed within the habitat.
C	Invasive non-native plant species (listed on Schedule 9 of WCA) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area.	No	Butterfly bush, listed as a category 3 invasive species on LISI, was present in the habitat with a cover greater than 5% of the vegetated area. Whilst beneficial for foraging invertebrates, the plant species establishes a monoculture in the urban environment that restricts biodiversity generally.
Condition		Moderate	

- 79 The site also supports areas of introduced shrub habitat (Secondary Code 847) along its northern and southern boundaries. These areas are defined by dense stands of butterfly bush, which forms a distinct canopy layer compared to the adjacent ruderal/ephemeral habitat. The habitat is primarily distributed adjacent to boundary walls where other species, such as ivy (*Hedera helix*) and traveller's-joy (*Clematis vitalba*), colonise and climb the boundary structures. Additional floral species occurring intermittently throughout the shrub layer include tall fleabane, goat willow and yarrow (*Achille millefolium*).
- 80 Introduced shrub habitats are not assessed in respect to condition in the Defra habitat condition methodology and despite providing some foraging potential for invertebrates and sheltering opportunities for birds, many of the species within the habitat are non-native, invasive or hold little intrinsic biodiversity value therefore is considered to be of biodiversity value within the **immediate survey area only**.
- 81 The habitat immediately to the north and south of the site support habitat falling within the u1 classification, with a mix of buildings, hardstanding, amenity landscaping and gardens. These habitats are generally of limited biodiversity interest, of a biodiversity value ranging between **negligible** and **within the immediate survey area only**. As the habitats fall outside of the site, they do not require consideration in the BNG assessment and do not require a condition assessment.

u1f – Sparsely vegetated urban land

- 82 The Site supports extensive areas of sparsely vegetated land, where overall vegetation cover is estimated to be between 10% and 50%. This habitat spans across the majority of the site's footprint and is primarily established upon a loose, gravelly substrate.
- 83 The floral composition within these areas consists of a range of colonising ruderal and opportunistic species. Species recorded during the survey include tall fleabane, yarrow, butterfly bush, Oxford ragwort, herb-Robert, great willowherb, Jersey cudweed (*Gnaphalium luteoalbum*), foxglove, bristly oxtongue, common poppy, pale toadflax, hoary mustard, and bramble (*Rubus fruticosus*). Additionally, the habitat supports small, patches of pioneering grasses that have established within the gravel substrate, including wall barley and Yorkshire-fog.

- 84 Sparsely vegetated urban land is relatively common in the urban environment. Whilst the habitat on the Site provides some potential to support faunal species, due to the recent nature of disturbance in some areas the populations present are unlikely to be significant. As a result, the habitat is considered to be of biodiversity value **within the immediate survey area only**.
- 85 A condition assessment for this habitat is required as part of the Biodiversity Net Gain assessment, the results of which are summarised in Table 9.

Table 9 Sparsely Vegetated Urban Land Condition Assessment

Criteria		Pass	Comment
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area	No	The habitat was generally sparse and was considered to provide only limited opportunities for vertebrates to live, eat and breed.
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year	Yes	Many of the species have a beneficial value to wildlife, with many flowering species present. A high diversity of invertebrates was observed within the habitat.
C	Invasive non-native plant species (listed on Schedule 9 of WCA) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area.	No	Butterfly bush, listed as a category 3 invasive species on LISI, was present in the habitat with a cover greater than 5% of the vegetated area. Whilst beneficial for foraging invertebrates, the plant species establishes a monoculture in the urban environment that restricts biodiversity generally.
Condition		Poor	

u1c – Artificial Unvegetated Unsealed Surface

- 86 A central area of the site supports a large mound of gravel and demolition rubble measuring approximately 3 to 4 metres in height, which results from clearance activities previously conducted on the Site. The rubble is compacted with fine soil and gravel, with individual stone fragments generally measuring below 15 cm in diameter. Floral colonisation across this feature is sparse, covering less than 10% total surface cover. The vegetation recorded include opportunistic ruderal species, including pale toadflax, woolly mullein, common poppy, great willowherb, and rosebay willowherb (*Chamaenerion angustifolium*).
- 87 This habitat type is relatively common in the urban environment and does not form part of any priority habitat. Although the bare habitat and vegetation can provide some value, the compacted nature of the ground limits opportunities as does the sparse nature of vegetation. As a result, the habitat is considered to be of **negligible** biodiversity value. The habitat does not require a UKHab condition assessment for the purposes of the BNG calculation.

u1b6 – Other Developed Land

- 88 The eastern area of the site, situated near the entrance, supports parcels of other developed land that are dominated by the presence of a large concrete slab with smaller areas of loose gravel substrate that fall below the minimum mapping unit. Vegetative colonisation across this habitat is highly limited, with sparse growth covering less than 10% of the total surface area and comprising opportunistic species including such as tall fleabane and wall barley. The habitat also includes a small accumulation of rubble similar in composition to the mound located within the centre of the Site, however it is of a significantly smaller size and falls below the minimum mapping unit for classification as a habitat in its own right.

- 89 This habitat type is widespread both locally and nationally, does not form part of any priority habitat, and is considered to be of **negligible** biodiversity value. The habitat does not require a UKHab condition assessment for the purposes of the BNG calculation.

u1e – Built linear feature

- 90 A small section of the eastern side of the site meets the classification as built linear feature, with stone paving providing pedestrian access along Ashley Road. The habitat is kept free of vegetation commensurate to its purpose.
- 91 This habitat type extends along the eastern boundary of the site, comprising both Ashley Road and the associated pavements, which are kept free of vegetation and only the section of the habitat present within the site boundary has been assessed for BNG.
- 92 This habitat type is widespread both locally and nationally, does not form part of any priority habitat, and is considered to be of **negligible** biodiversity value. The habitat does not require a UKHab condition assessment for the purposes of the BNG calculation.

G4 – Modified Grassland

- 93 The parkland to the west of the site supports amenity grassland habitat with areas of bare ground, including along the boundary with the Site. Of particular note is the presence of a series of mature trees along the western and north-western boundaries, with species present including Norway maple (*Acer platanoides*), field maple (*Acer campestre*), hornbeam (*Carpinus betulus*), common lime (*Tilia x vulgaris*) and cherry laurel (*Prunus laurocerasus*).
- 94 Modified grassland is a common habitat locally and nationally and not typically of sufficient diversity to warrant classification as a priority habitat. As a result, the habitat is considered to be of biodiversity value **within the immediate survey area only**, however the presence of mature and semi-mature trees is of biodiversity interest as they provide notable habitat opportunities for a range of faunal species including birds and bats and are of notable interest in the urban environment. As a result, the individual trees are of **Local** biodiversity value.
- 95 As the habitats are not present within the site, they do not form part of the BNG assessment and as a result do not require a condition assessment.

Species

Flora

- 96 The presence of floral species within the site is primarily influenced by the extent of unused, neglected, and recently disturbed ground. The floral assemblage recorded is considered typical of a brownfield site or vacant and derelict land, being dominated by opportunistic urban species, ruderal colonisers, and hardy grasses.

- 97 Jersey cudweed (*Gnaphalium luteoalbum*), identified on Schedule 8 of the Wildlife and Countryside Act 1981 (as amended), was identified to be present on the Site, with three stands identified in the centre of the Site. Although the species is protected through its inclusion on Schedule 8, the warming urban environment provides an opportunity for the species to establish, with the species appearing to be spreading rapidly in the urban environment with new stands establishing across a number of London Boroughs. This is reflected in the Joint Nature Conservation Committee's (JNCC's) recommendation³⁷ to remove the species from Schedule 8, with an indication that populations in these environments are unlikely to be native in origin and the ease with which they are spreading does not support continued protection in these environments. With this in mind, whilst it remains a protected species, the presence of Jersey cudweed is considered to be of biodiversity value **within the immediate survey area only**.
- 98 However, notwithstanding the JNCC recommendation, the species remains protected unless and until legislative amendment occurs and therefore must be treated as legally protected for present purposes.
- 99 No other plant species identified on Schedule 8 were recorded, and no plant species listed on Schedule 9 as invasive were identified on the Site. However, butterfly bush is considered to be locally invasive through the London Invasive Species Initiative (LISI) and was identified to be extensively present on the Site. LISI identify the species as being of high impact or concern which is widespread in London and requires concerted, coordinated and extensive action to control/eradicate. Whilst it provides a foraging resource for invertebrates, it regularly establishes a monoculture in the urban environment that restricts other plant growth.
- 100 The remaining floral species are relatively common and not specifically protected. Overall, the flora present is considered to be of biodiversity value **within the immediate survey area only**.

Birds

- 101 The site provides opportunities for nesting and foraging birds, particularly within the introduced shrub habitat, whilst the adjacent trees also provide significant opportunities for nesting birds. No active or disused nests were observed during the survey.
- 102 Several bird species were recorded during the survey, including magpie (*Pica pica*), feral pigeon (*Columba livia domestica*) and common blackbird (*Turdus merula*) as well as various smaller songbirds that could not be identified within the dense vegetation.
- 103 The species observed are common in urban environments, with the assemblage on the Site not considered likely to form a notable assemblage as a result of the species or diversity of species present. Although the Site supports a range of ruderal vegetation, this is recently established and as a result is not considered likely to have established a significant invertebrate resource of sufficient extent or maturity to support a notable assemblage of foraging birds, such as black redstart (*Phoenicurus ochruros*).
- 104 Therefore, the species present are considered to be of biodiversity value within the **immediate survey area only**. However, the presence of nesting birds could represent a legal constraint to the development that requires mitigation.

³⁷ JNCC (on behalf of Natural England, Natural Resources Wales and NatureScot) (2025) *Seventh Quinquennial Review of Schedules 5 and 8 of the Wildlife and Countryside Act 1981: Report and Recommendations from the Joint Nature Conservation Committee to the Department of Environment, Food and Rural Affairs, Scottish Government and Welsh Government on behalf of Natural England, Natural Resources Wales and NatureScot*. JNCC, Peterborough, ISBN 978-1-5286-5994-9.

Bats

Daytime Bat Walkover

- 105** The Site is considered to provide negligible suitability for commuting and foraging bats, with the vegetation only recently established and therefore foraging resources are unlikely to have sufficiently developed to support regular foraging. The site also contains no potential roost features, and whilst the southern boundary brick wall contains some areas of missing mortar the feature is covered by heavy vegetation growth that physically blocks them from entering potential voids. As a result, the Site is of negligible value for roosting bats.
- 106** Overall, the potential presence of bats utilising the site for foraging, commuting, or opportunistic roosting is considered to be of biodiversity value **within the immediate survey area only**.
- 107** However, several trees located outside the Site, approximately 2 metres from the western boundary, support potential roost features (PRFs) in the form of cracks within the trunk and knot holes that could be suitable for roosting bats and requires further consideration (Target Notes 1 and 2 in Figure 7). In accordance with best practice guidelines, these trees have been subject to further evaluation via a Ground Level Tree Assessment to further inform the potential for adverse impacts upon any roosting bats present.

Ground Level Tree Assessment

- 108** A Ground Level Tree Assessment (GLTA) was conducted on 5th August 2026 to further evaluate features within the adjacent trees identified as having potential bat roosting suitability and inform the potential for adverse impacts as a result of the Proposed Development upon roosting bats present.
- 109** The assessment considered two Norway maples located immediately outside the western boundary of the site. Knot holes previously identified on one tree at were found, on detailed inspection, to be too shallow to provide suitable roosting opportunities for bats, and no further assessment is required for this tree. The second tree, Target Note 1, was found to feature a fissure leading to a cavity within the trunk, assessed as suitable to support multiple bats and assigned an overall suitability rating of PRF-M (Potential Roost Feature suitable for Multiple bats). As a result, to further inform the potential for impacts, further assessment in the form of an endoscope survey is proposed to establish the presence or likely absence of bats.

Other Species

- 110** On the basis of the habitat present and available desk-study/survey information as well as the context of the site, no other protected species are considered likely to be present and represent a constraint to the redevelopment of the Site.

Baseline Ecological Value

- 111** While some of the baseline habitats do not require condition assessments, the ruderal/ephemeral and sparsely vegetated urban land habitats do require this as part of the BNG assessment. These have been assessed in line with the relevant BNG condition criteria, which is summarised in the habitat descriptions above and the completed condition sheets included in Appendix E.
- 112** The Proposed Development is assessed as having a baseline biodiversity value of 1.60 habitat units, as identified in Table 10. With an absence of hedgerow and watercourse units within the site and zone of influence, these are excluded from the assessment. The full detail is provided in the Statutory Biodiversity Metric calculation which accompanies the planning application.

Table 10 Summary of Baseline Habitat Value

Habitat	Area (ha)	Distinctiveness	Condition	Strategic Significance		Baseline Unit Value
Developed land; sealed surface	0.0164	Very Low	N/A - Other	Low	Compensation Not Required	0.00
Built linear feature	0.0045					0.00
Artificial unvegetated, unsealed surface	0.1503					0.00
Ruderal/Ephemeral	0.25	Low	Moderate		Same distinctiveness or better habitat required ≥	1.00
	0.2190		Poor			0.44
Introduced Shrub	0.0807		N/A			0.16
Total						1.60

Irreplaceable Habitat

- 113** Irreplaceable habitat is defined in BS 8683:2021 as “*habitat that cannot be recreated within a specified time frame because it would be technically very difficult or impossible to recreate taking into account their age, uniqueness, species diversity, rarity and environmental or historical context*”, with Schedule 1 of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 identifying those relevant. None of these habitats were identified to be present within the site.

Habitat Degradation Activities

- 114** The site has undergone no significant change since the demolition of the former buildings in 2023, which was carried out in accordance with extant planning permissions (planning application references HGY/2016/4165, HGY/2018/2353 and HGY/2019/0108, approved at appeal under reference APP/Y5420/W/19/3232707).
- 115** Prior to demolition, the site comprised two large warehouse-style buildings with associated access roads and parking areas, with areas of ornamental landscaping and allotments. The BNG methodology requires consideration of any habitat degradation occurring after 30 January 2020, the reference date established within the BNG framework. However, as the clearance of the site was undertaken pursuant to an approved planning permission, this does not constitute unauthorised habitat degradation for the purposes of BNG.
- 116** While the extant planning permission may allow for further site clearance, Schedule 7A of the Town and Country Planning Act 1990 (as amended) identifies that where activities to implement or in connection with planning permission carried out after 25 August 2023 that lower the onsite biodiversity value, the biodiversity value is to be taken immediately before those activities. As such, the habitats as presented in the habitat description above, reflecting the current site condition, rather than the pre-demolition condition, form the appropriate baseline for the Site as any further clearance of the site will lower the onsite biodiversity value.

ECOLOGICAL IMPACTS AND MITIGATION

- 117** The following provides a summary of the Ecological Features present within the zone of influence of the Proposed Development, an assessment of their importance, or potential importance, based on the findings described above and their requirement for further consideration of impacts and mitigation.

Table 11 Summary of Ecological Features Present

Feature	Likely Biodiversity Importance	Discussion
Designated Sites		
Epping Forest SAC and SSSI	Up to International	The Proposed Development will not result in any direct impacts on the sites. There is no ecological connectivity between the Site and the designated site, with impacts during construction not considered likely to occur over the distances involved and in the context of the urban environment. However, the Site does fall within the 6.2 km zone of influence for recreation impacts on the SAC, and therefore the receptor requires further consideration in respect to this.
Lee Valley SPA and Ramsar	International	The Proposed Development will not result in any direct impacts on the sites. The Site is in close proximity to these designated sites and is included in the development types identified in the SSSI Impact Risk Zone as having potential for adverse effects on the Site. There is limited ecological connectivity between the Site and the designated sites, with impacts during construction not considered likely to occur over the distances involved and in the context of the urban environment. The Site is not located within the area of influence for dust impacts; surface water impacts are unlikely to occur over the distances involved and in the context of the urban environment and over the distances involved noise levels would be expected to attenuate to below background levels. In operation, the Proposed Development is not considered likely to give rise to significant effects on the designated sites as a result of recreation as visitor controls managing the site and Walthamstow Marshes SSSI means that adverse effects are unlikely. Nevertheless, further consideration of this receptor has been given through a Shadow Habitat Regulation Assessment (sHRA).
Walthamstow Reservoirs SSSI	National	The Proposed Development will not result in any direct impacts on the sites. There is limited ecological connectivity between the Site and the designated sites, with impacts during construction considered unlikely to occur over the distances involved and through the implementation of mitigation measures considered further in this report, Walthamstow Marshes SSSI site is not considered to be susceptible to recreation impacts, being managed by the Lea Valley Regional Park Authority to balance the biodiversity value of the site with local community space for recreation. Access to the Chingford Reservoirs is by permit only, and therefore recreational disturbance is managed through this process and unlikely to be significant. As a result, further consideration of these receptors is not required.
Walthamstow Marshes SSSI Chingford Reservoirs SSSI	National	The Proposed Development will not result in any direct impacts on the sites. There is limited ecological connectivity between the Site and the designated site, with impacts during construction considered unlikely to occur over the distances involved and through the implementation of mitigation measures considered further in this report, Walthamstow Marshes SSSI site is not considered to be susceptible to recreation impacts, being managed by the Lea Valley Regional Park Authority to balance the biodiversity value of the site with local community space for recreation. Access to the Chingford Reservoirs is by permit only, and therefore recreational disturbance is managed through this process and unlikely to be significant. As a result, further consideration of these receptors is not required.
Springfield Park LNR	Local	The Proposed Development will not result in any direct or indirect impacts on the site, with limited ecological connectivity impacts during construction and operation are considered unlikely to occur over the distances involved and in the context of the urban environment. As a result, further consideration of this receptor is not required.
Down Lane Recreation Ground Local SINC	Local	The Proposed Development will not result in any direct impacts on the SINC. However, indirect impacts are possible as a result of the completion of construction activities, with the Site falling within the zone of influence for impacts associated with dust generation from trackout activities only. Impacts associated with noise generation and surface water run-off are not considered likely to adversely impact upon the SINC. As a result, further consideration is given to the impacts and mitigation required.
Tottenham Hale to Northumberland Park Railsides Borough SINC	Borough	
Metropolitan SINC	Metropolitan	The remaining Sites of Importance for Nature Conservation, at various scales, are not considered likely to be adversely affected by the Proposed Development. There is limited ecological connectivity between the Site and the SINC, and over the distances involved and in the context of the dense urban environment associated with the Proposed Development Site impacts are unlikely. Therefore, further consideration of these receptors is not required. Impacts associated with linked designations, notably Lee Valley SPA and Ramsar, are addressed within the higher designation and not repeated here.
Borough SINC	Borough	
Local SINC	Local	

Feature	Likely Biodiversity Importance	Discussion
Habitats		
UK BAP Priority Habitats	Up to Borough	The UK BAP priority habitats are all distanced from the Proposed Development with limited ecological connectivity across the urban environment and, given the urban context of the surrounding environment, limited potential for indirect impacts. As a result, the UK BAP Priority Habitats are not within the zone of influence of the project, and further consideration is not required.
Waterbodies	Local	The Proposed Development is not expected to result in any direct impacts upon the nearby watercourses and waterbodies. Indirect impacts during construction are not considered likely to occur considering then urban context of the surrounding environment and limited connectivity. As a result, further consideration of these receptors is not required.
Urban trees	Local	Whilst the Proposed Development does not have potential for direct impacts, with the trees falling outside of the Site, it does have potential for indirect impacts, primarily as a result of lighting during construction and operation and disturbance due to noise during construction. As a result, further consideration of this receptor is required.
Species		
Flora	Within the immediate survey area	The floral species recorded across the Site are largely common in urban brownfield environments and do not consist of notable or protected species. However, the Schedule 8 protected plant species Jersey cudweed was identified as present in the centre of the Site. Although the plant is not considered to be ecologically significant, based on recent assessment by JNCC, the plant remains legally protected and as a result requires further consideration.
Breeding Birds	Within the immediate survey area	The Site offers nesting opportunities for bird species along with mature trees alongside the Site, however given the urban context of the Site the bird species present are considered likely to be relatively common for the area and given the extent of vegetation on the Site is unlikely to support a significantly diverse assemblage. However, the potential for the presence of nesting birds within the Site will have legal and policy implications to the Proposed Development that require mitigation.
Bats	Within the immediate survey area	The Site is considered to hold negligible foraging and commuting potential, with an absence of well-developed habitats and features on the Site. The Site itself is also considered to hold negligible roosting potential. However, one tree located alongside the western boundary of the Site contains features suitable for the presence of multiple bats that requires further consideration and may require mitigation.
Amphibians and reptiles	Likely Absent	Whilst the desk study identifies the presence of common frog, common toad and slow worm in the study area, the Site does not provide any suitable habitat and is isolated from suitable habitat with records of the species. As a result, they are considered likely absent from the Site and do not require further consideration
Invertebrates	Negligible	The ruderal vegetation offers potential foraging opportunities for common pollinators. However, given the recent establishment of these habitats, the invertebrate community is unlikely to be well-developed. The presence of stag beetle is considered unlikely as a result of the lack of suitable habitat. Therefore, further consideration of this receptor is not required.
Other mammals	Likely Absent	The Site does not provide suitable habitat for brown hare, badger or hedgehog, and contained no field signs indicating presence. Therefore, the species are considered likely absent, although precautionary measures are considered to ensure any species accessing the site can be adequately protected.
Invasive Species	Negligible	Locally invasive species were present on the Site, comprising butterfly bush. Removal of this species is recommended and would improve the condition of habitats under BNG principles. These species do not require a particular process or disposal requirements. Therefore, further specific consideration is not required.

Further Surveys and Assessments

- 118** The following targeted surveys and assessments are required to further assess the potential for species to be present and consider the potential impacts of the Proposed Development:
- A presence/likely absence survey for roosting bats, comprising three detailed PRF inspections to be undertaken between May and September to determine the presence or likely absence of roosting bats. Consequently, the assessment of potential impacts on roosting bats remains incomplete pending the completion of these surveys.

Design Implications and Damaging Activities

Design

- 119** The Proposed Development will result in the removal of all existing on-site habitats and subsequent loss of the baseline habitat value of the site. However, the habitats are not of a type that require strict protection, with consideration required for the delivery of compensatory habitat.
- 120** The design does, however, have the potential to influence the retention of the mature trees on the western and north-western boundaries and impacts associated with the potential presence of roosting bats within one of these. Given the proximity of the trees to the boundary, development has the potential to impact upon the future viability of the trees as a result of encroachment into the Root Protection Areas (RPA) and loss of key roots to the trees. However, the design includes an offset from the boundary that avoids the RPAs for the trees and therefore allows for their retention.
- 121** Appropriate measures, in line with best practice guidance provided by the Institute of Lighting Professionals (ILP)³⁸, should be considered in the lighting design to minimise light spill from the development whilst ensuring a safe and accessible environment.
- 122** The design also has implications for the inclusion of urban greening and green infrastructure, with the Landscape Strategy for the Proposed Development providing opportunities to compensate for some of the baseline habitat loss. Features such as ground level planters, green walls, urban trees and green roofs may help to restore some biodiversity value to the Site, support habitat connectivity across the site.

Construction

- 123** The construction phase generally holds the greatest potential for adverse impacts on biodiversity features within a project, particularly as a result of Site clearance and removal of vegetation. site clearance has the potential for adverse impacts on breeding birds, however, with the adoption of appropriate measures the impacts can be mitigated.

³⁸ ILP (2023). *Bats and Artificial Lighting at Night. Guidance Note 08/23 Institute of Lighting Professionals, Rugby*

- 124** Construction activities, including preliminary ground investigations, earthworks, construction and associated machinery and vehicular movements have the potential to generate indirect effects associated with noise and dust. The Institute of Air Quality Management (IAQM) guidelines³⁹ identify an area of influence of dust effects on ecological receptors as 50 m from the generation source, and 50m from roads used by construction vehicles for up to 500 m from the site. The only designated sites which fall within this zone of influence are Down Lane Recreation Ground Local SINC, Tottenham Hale to Northumberland Park Railsides Borough SINC and Tottenham Railsides Borough SINC. However, the impacts associated with these can be mitigated through standard mitigation measures, secured through a Construction Environmental Management Plan (CEMP) and as a result the subsequent effect is unlikely to be significant.
- 125** Construction activity and the associated noise generated may have potential for adverse impacts upon roosting bats, should they be shown to be present within the PRFs of the adjacent mature tree. However, measures can be implemented that will ensure impacts are mitigated and avoid a disturbance to the roost. Noise impacts during construction are unlikely to cause significant long-term impacts on faunal species generally, with species present likely to be habituated to elevated noise levels and any disturbance will be temporary.

Operation

- 126** The inclusion of residential units on the site could result in adverse effects on designated sites as a result of increases in recreational pressure, with the site falling within the Zone of Influence for recreational pressure impacts to the Epping Forest SAC. Whilst, the London Borough of Haringey is not a significant source of visitors to the SAC, as only a small part of the borough falls within the 6.2 km Zol and less than 1% of visitors originate from the Borough⁴⁰, further consideration of this has been made through a Shadow Habitat Regulations Assessment (sHRA), submitted as part of the planning pack. As a result, the impact and mitigation requirements are not considered further here.
- 127** Recreational pressures on the Lee Valley SPA and Ramsar are controlled through access restrictions and management of the reservoirs, with access to the King George V and William Girling Reservoirs restricted by permit from Thames Water and the remainder of the site is managed by the London Wildlife Trust as the Walthamstow Wetlands to balance recreational pressures and biodiversity. However, consideration is also given through the sHRA and as a result the impact and any mitigation requirements are not considered further here.
- 128** As the Proposed Development will be car free and utilise an electricity-led Energy Strategy, impacts upon Epping Forest SAC as a result of changes in air quality are unlikely but are considered further in the sHRA.
- 129** Enhancements delivered through the development will be appropriate to the nature of the scheme, with appropriate management of the enhancements provided through a long-term management plan which will ensure they continue to provide a biodiversity benefit in the long-term.

Mitigation

- 130** The application of mitigation measures is required to minimise or negate adverse effects on biodiversity features discussed above and/or deliver enhancement measures, complying with legislative and policy requirements.

³⁹ IAQM (2024) *Guidance on the assessment of dust from demolition and construction. Version 2.2, January 2024. Institute of Air Quality Management, London.*

⁴⁰ Liley, D. (2020) *Epping Forest Visitor Survey (2019). Unpublished report by Footprint Ecology for Epping Forest District Council.*

- 131** The consideration of mitigation measures required has also taken into account the potential for the biodiversity value of the Site to alter between the survey on which the identification of features is based and the commencement of construction activities, ensuring any change in circumstance is appropriately addressed.

Designated Sites

- 132** Developments that result in a net increase in dwellings within the 6.2 km Zone of Influence of the Epping Forest SAC require mitigation to avoid having a likely significant effect upon the SAC in-combination with other projects and plans as a result of increases in recreational pressure. Mitigation required for this is addressed through the sHRA and as a result will not be repeated in this assessment.
- 133** The need for any further mitigation requirements associated with impacts that may occur to the Epping Forest SAC or Lee Valley SPA and Ramsar are discussed in the sHRA.

Habitats

Trees

- 134** Trees adjacent to the Site that are confirmed by an arboriculturist as being suitable for retention should be protected through the construction phase in line with British Standard 5837 – ‘Trees in relation to design, demolition and construction’⁴¹ and as instructed by an arboriculturist. The measures implemented should include the establishment of an appropriate Root Protection Area (RPA) for each tree, ensuring the roots are protected from irreversible damage as a result of sustained machinery movements. BS 5837 recommends an appropriate RPA is based on the stem diameter of each individual tree, although local conditions may need to be considered based on the urban nature of the site and subsequent influences on root spread. The establishment of protection of the RPA will afford some protection to the main trunk and canopy, although in some cases it may be appropriate to extend this to the edge of the canopy to provide full protection to the tree.
- 135** If the development requires incursion into an RPA, the effects of such incursion should be considered by an arboriculturist to ensure the trees are not significantly affected. Similarly, any damage to trees during the construction phase should be reviewed by an arboriculturist and any remedial actions recommended should be carried out as instructed.

Species

Jersey Cudweed

- 136** Retention of Jersey cudweed on the site is unlikely to be feasible within the Proposed Development, and as a result an appropriate mitigation strategy should be secured through planning condition..
- 137** Traditionally, Jersey cudweed mitigation has involved translocation of the plant to suitable habitat within the site, such as a green roof, however given the JNCC’s recommendation that populations in such environments are unlikely to be native it may be possible for the plant to be removed from the Site. However, as the plant is protected under Schedule 8, the precise mitigation approach should be agreed with Natural England through the relevant licensing process. As the species is not considered to be ecologically significant, the licence is required only to comply with the legislative protection afforded to the plant, with its loss from the site not considered to be of biodiversity significance.

⁴¹ BSI (2012) British Standard (BS) 5837:2012 – Trees in relation to design, demolition and construction. British Standards Institute.

- 138** If translocation within the site is the preferred approach, the Proposed Development provides suitable opportunities at ground and roof levels for inclusion of the plant species within landscaping. However, it is likely the plant will require temporary translocation and storage during the construction works if retention on site is the preferred approach.
- 139** Due to the prevalence and rapid spread of the species in the local area, a check prior to the commencement of construction is recommended for all applications to ensure works areas remain free of Jersey cudweed or the extent reported in this assessment remains accurate, and consideration given to its potential presence throughout construction. In the event that the species is identified in a new location, works in that area should stop and further ecological advice be sought. This may require obtaining a Natural England Mitigation Licence before works in this area can continue.

Breeding Birds

- 140** Depending on the construction programme, the potential for the development site to support breeding birds within the vegetation could comprise a constraint. The construction programme should be arranged, where practicable to give due consideration to the nesting season (typically March to August inclusive), avoiding the sensitive period for the removal of vegetation and commencement of demolition if possible. Otherwise, a nesting bird check of the shrub should be carried out no more than 48 hours prior to the commencement of works on-site by a suitably qualified ecologist to ensure that no active nests are present.
- 141** In the event that an active nest is discovered during a search prior to commencement or during the completion of construction works, the feature surrounding and supporting the nest should be retained without alteration until the young have fledged. It may be appropriate to establish a buffer zone from the nest, with no plant or personnel entering this area until the young have fledged, and the nest should be monitored. In the event the nesting birds are agitated by the works, it may be appropriate to extend the buffer zone. By following this approach, the Proposed Development will not have a detrimental impact on nesting birds on the site, and the Applicant will remain compliant with wildlife legislation.

Bats

- 142** Mitigation specific to the potential presence of roosting bats associated with the adjacent tree will be updated following the completion of detailed PRF inspections. However, as the tree can be retained through the construction phase, consideration will principally be required in respect to disturbance impacts as a result of activities on the Site during construction and as a result of lighting during the construction and operational phases.
- 143** Appropriate measures will be identified according to the findings of the survey to ensure bats are protected through the construction. It is likely that protection may be afforded through the provision of acoustic barriers along the western boundary close to the tree, which will reduce noise levels experienced at the roost, however if this is not feasible it may require a temporary closure of the feature, completed under a Natural England Mitigation Licence, and appropriate compensation provided.
- 144** Notwithstanding the results of the further survey, a sensitive lighting scheme should be adopted, avoiding illumination of the roosting feature and following best practice measures provided by the ILP⁴² during both the construction and operation phases, including:
- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used; LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability;
 - A warm white light source (2700Kelvin or lower) should be adopted to reduce blue light component;

⁴² ILP (2023) *Bats and Artificial Lighting at Night. Guidance Note 08/23. Institute of Lighting Professionals, Rugby.*

- Light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats;
 - Internal luminaires can be recessed (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill; Waymarking inground markers (low output with cowls or similar to minimise upward light spill) to delineate path edges;
 - Column heights should be carefully considered to minimise light spill and glare visibility. This should be balanced with the potential for increased numbers of columns and upward light reflectance as with bollards;
 - Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered; Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt;
 - Where appropriate, external security lighting should be set on motion sensors and set to as short as possible a timer as the risk assessment will allow; Use of a Central Management System (CMS) with additional web-enabled devices to light on demand;
 - The use of bollard or low-level downward-directional luminaires is strongly discouraged. This is due to a considerable range of issues, such as unacceptable glare, poor illumination efficiency, unacceptable upward light output, increased upward light scatter from surfaces and poor facial recognition which makes them unsuitable for most sites. Therefore, they should only be considered in specific cases where the lighting professional and project manager are able to resolve these issues; and
 - Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely.
- 145** Due to the transient nature of the use of potential roost features and as the presence and/or suitability of such features can alter over time, and regardless of the results of the targeted bat surveys, it is recommended that a walkover survey is carried out prior to commencement of construction activities to ensure any significant changes are identified and addressed. The check should ensure the condition remains as described in this appraisal, with any new features associated with the site or immediately adjacent buildings/trees are picked up. The check should be carried out at an appropriate time, in line with best practice guidelines and with sufficient time for mitigation (e.g. a Natural England Mitigation Licence application) to be incorporated prior to commencement should it be required.

Best Practice Measures

- 146** Best environment practice measures incorporated into the construction phase, such as those controlling the emission of dust or noise and subsequent effects on sensitive receptors, will ensure potential adverse effects on biodiversity features are reduced.

Staff Awareness

- 147** The principal contractor should appoint a 'Biodiversity Champion', or similar, with responsibility for ensuring mitigation requirements are fully adopted, monitored and to raise awareness of ecological issues on the Site. The Biodiversity Champion role should:
- be familiar with the biodiversity features present on the site and with potential to establish on the Site during construction, including their legal protection and mitigation requirements;
 - have sufficient authority to change site practices and take the required action necessary to avoid harm to species present/establishing during construction, and may include the need to temporarily

halt works whilst further ecological advice is sought and remedial action taken to avoid harm and/or a legal offence;

- undertake regular inspection of the construction site, including consideration of mitigation measure implementation to ensure they are effective and appropriate, and give considering to the potential for species (e.g. breeding birds) to establish on the Site during construction;
- raise awareness of ecological issues associated with the Site and the mitigation requirements through targeted staff training, allowing site personnel to understand the ecological sensitivities of the Site (or potentially on the Site) and associated mitigation measures required. This will allow site personnel to comply with the legal requirements for protecting plants and animals, and could be delivered through the site induction and topic specific toolbox talks as required;
- input into the design programme, to ensure ecological enhancement measures are implemented at an appropriate time of year and an appropriate time in the construction programme, to ensure they do not become a constraint to further works;
- oversee the installation of ecological enhancement measures in line with manufacturer recommendations and landscape/ecological guidelines, and maintenance of the features (habitats or artificial species boxes) following installation and up to handover;
- keep a log of all actions taken for biodiversity, including inspection findings, remedial measures and training undertaken.

Change in Ecological Value

- 148** Retention of baseline habitats is not proposed within the design, which will result in the loss of 1.60 habitat units. The baseline habitats are typical of urban environments and disturbed land that support colonising and opportunistic species, these habitats do not warrant strict protection, and compensation for their loss will be delivered through the proposed landscape strategy on-Site.

ENHANCEMENT STRATEGY

Enhancements Adopted

Habitats

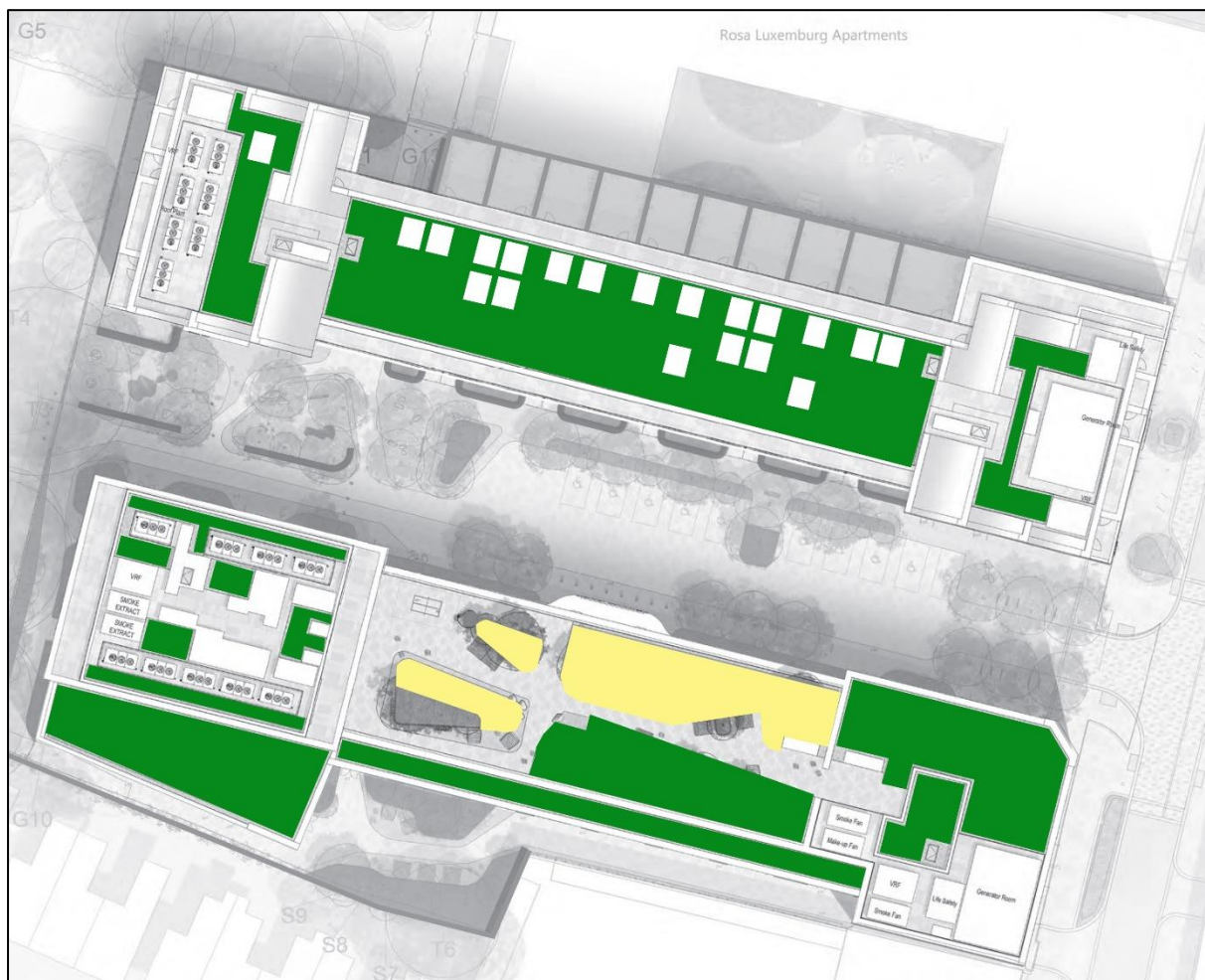
- 149** The proposed development incorporates a number of habitats and enhancement features within the building and general landscape design. Information on the areas of planting have been taken from the landscape drawings relevant to this project. The habitats these represent are described below.

Biodiverse Green Roofs

- 150** At this stage, full details of the biodiverse green roofs are not yet available and are expected to be confirmed during the detailed design phase. However, it is expected that a biodiverse roof can be accommodated within the design and will be required to meet the following aspects:
- A varied substrate depth between 80 mm and 150 mm, with at least 50% of the area having a depth of 150 mm to maximise its biodiversity condition;
 - The habitat will be planted and seeded with a wide range of dry grassland wildflower and sedum species, with a target ratio of 60:40 wildflowers to sedum; and,
 - Species richness will reflect that of dry grassland habitats, with a target of over 25 native wildflower species.

- 151** Biodiverse roofs are proposed at roof level across both buildings of the Proposed Development. Once established, the majority of the biodiverse roofs are expected to achieve a “good” condition under the Statutory Biodiversity Metric, meeting the following criteria;
- Present a varied vegetation structure that provides foraging and nesting opportunities for faunal species, and where one single component does not account for more than 80% of the total habitat type (Criterion A)
 - Include beneficial plant species that provide pollinator resources across the seasons (Criterion B)
 - Have an absence of invasive species or cover below 5% (Criterion C); and
 - Have a varied substrate depth of 80 – 150mm with at least 50% at 150mm (Criterion G).
- 152** The roofs will also include additional habitat features in the form of stone, sand and/or log piles, however, small sections of the biodiverse roof in the southwest corner of the Site will not feature these additional habitat features and as such, these areas totalling at 82 m², are given a moderate condition. The biodiverse green roofs in total, cover an area of approximately 1,416 m² (1314 m² in good condition and 82 m² in moderate condition) as identified in dark green in Figure 8.

Figure 8 **Extent of Green Roof Habitats** (from drawing 26.009-BOSK-ZZ-XX-RP-L-0004 P01)



Other Green Roof

- 153** Additionally, the landscape proposals include accessible roof terraces with ornamental planting and amenity grass. While primarily installed for amenity and visual interest, these features still provide a

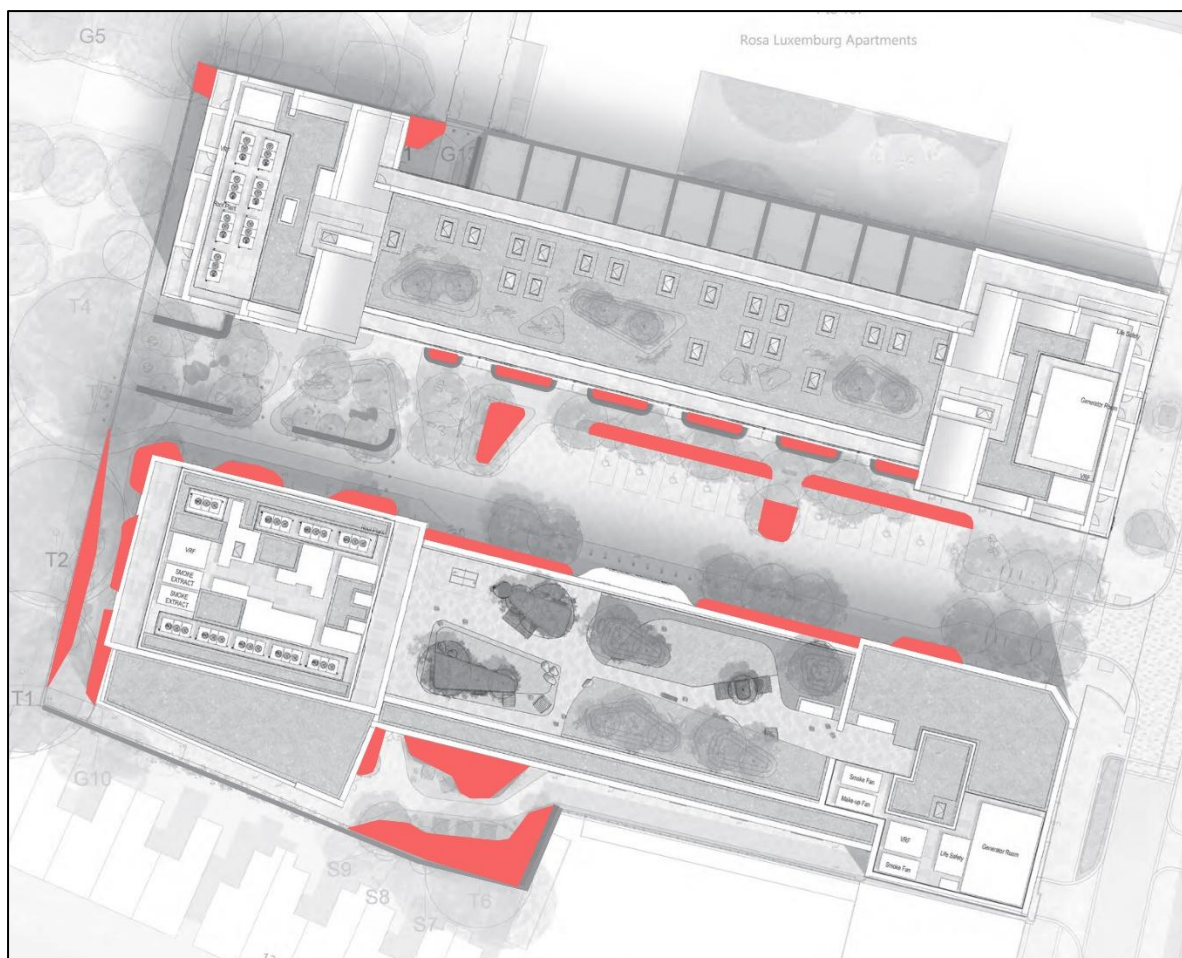
biodiversity enhancement and under the UK Habitat Classification they are classified as 'other green roof' habitat, since they do not meet the thresholds for biodiverse or intensive green roofs. This can include roof top perennial planters and green roofs with shallower substrates, usually c. 50 mm to 80 mm and supporting principally sedum species, and those that do not provide variation in substrate depth, closely aligning to the extensive green roof type within CIRIAs definition. The biodiversity potential associated with these habitats is generally more restricted as a result of the conditions created, for example shallow substrates will have a lower capacity for nutrient and water and be subject to higher temperature fluctuation and as a result the species that are adapted to the harsh environment created are more limited than for green roofs with greater substrate depths.

- 154** The other green roof habitat covers an area of approximately 195 m² and does not require a habitat condition to be identified. Whilst it does not affect the habitat condition, it is recommended that the planting plans maximise the inclusion of plants that are native or of known value to wildlife and drought tolerant such as those identified by the Royal Horticultural Society as Plants for Pollinators⁴³, as this will maximise their value in providing a foraging resource. The extent of the other green roof habitat is identified in yellow in Figure 8.

Ground Level Planter

- 155** The landscape proposals include various areas of planting across the public realm which is best described under the UKHab classification as ground level planters. These areas primarily include ornamental sun and shade planting as well as wildflower planting. The planting schedule is expected to comprise of shrubs, herbaceous plants and grass species, though the specific details and the planting schedules are not available at this stage.
- 156** The ground-level planter habitat will cover a total area of 334 m² and does not require a condition assessment. The extent the habitat is shown in orange in Figure 9.

⁴³ Royal Horticultural Society (2026) RHS Plants for Pollinators. Available at: <https://www.rhs.org.uk/science/research/plants-for-pollinators> (Accessed: 1 June 2026)

Figure 9 **Extent of Ground Level Planter Habitat** (from 26.009-BOSK-ZZ-XX-RP-L-0004 P01)

Modified Grassland

- 157** The proposals include for the provision of amenity grassland within the centre of the site. While specific details of the planting are not available at this stage, it is expected that the grassland will be provided as an amenity resource and as a result the required management of these habitats, it will result in a low species diversity and overall low sward height. As a result, the proposed habitat has been classified as modified grassland rather than a habitat of higher distinctiveness.
- 158** As a result of the management and maintenance of the habitat for amenity purposes, the diversity of species within the habitat is unlikely to exceed six species per square meter. Achieving more than six species per square meter is an essential criterion for meeting more than poor condition, and therefore, irrespective of compliance with the other condition criteria, the modified grassland habitat is considered to achieve a poor condition for the BNG assessment.
- 159** The habitat will cover a total area of 165 m² and is shown in green in Figure 10.

Figure 10 **Extent of Modified Grassland Habitat** (from drawing 26.009-BOSK-ZZ-XX-RP-L-0004 P01)



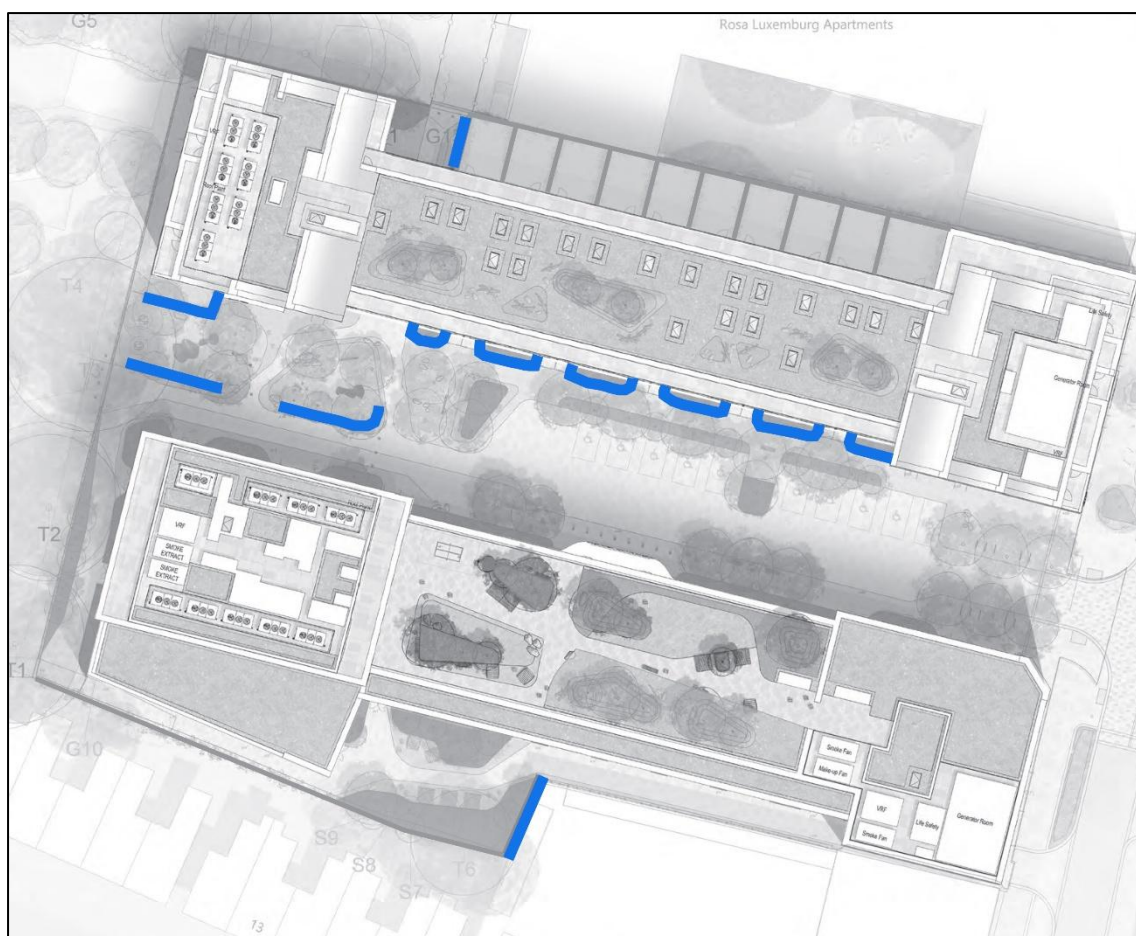
Individual (Urban) Trees

- 160** The landscape strategy incorporates the provision of 76 individual trees across the developed scheme, distributed between ground level and the various roof terraces with 56 proposed at ground level and 20 proposed on the roof terraces. All proposed trees are classified within the small-size category as their diameter at breast height (DBH) will be below 30 cm when planted.
- 161** Across the entire site, all trees are expected to undergo routine operational pruning and management. Consequently, no trees will meet Criterion D (absence of adverse anthropogenic impacts) or Criterion E (development of natural ecological niches).
- 162** A total of 20 trees are expected to achieve moderate ecological condition, while all remaining trees will be of poor ecological condition in respect to BNG. The 20 moderate-condition trees meet three criteria: they are native species (Criterion A), feature a continuous canopy by default as individual trees (Criterion B), and has more than 20% of their canopies oversailing vegetated ground (Criterion F).
- 163** A total of five additional native trees are proposed; however, as they will not oversail vegetation they only pass two condition criteria (A and B) and are therefore of poor ecological condition. All remaining trees are non-native and, passing only two criteria (B and F), will be of poor ecological condition.

- 164** The species proposed for planting at ground level include stone pine (*Pinus pinea*), fastigate silver birch (*Betula pendula* 'Fastigiata'), spire cherry (*Prunus × hillieri* 'Spire'), autumn spire rowan (*Sorbus* 'Autumn Spire'), small-leaved lime (*Tilia cordata*), honey locust (*Gleditsia triacanthos*), ballerina juneberry (*Amelanchier* 'Ballerina'), and fastigate hornbeam (*Carpinus betulus* 'Fastigiata'). Tree planting proposed at roof level include paperbark maple (*Acer griseum*), juneberry (*Amelanchier lamarckii*), mountain pine (*Pinus mugo*), olive tree (*Olea europaea*), field maple (*Acer campestre*), and common hawthorn (*Crataegus monogyna*).
- 165** The locations of individual trees are identified in Figure 11 with those identified in light green located at ground level and those identified in dark green located across the roof level.

Figure 11 **Extent of Individual Trees** (from drawing 26.009-BOSK-ZZ-XX-RP-L-0004 P01)

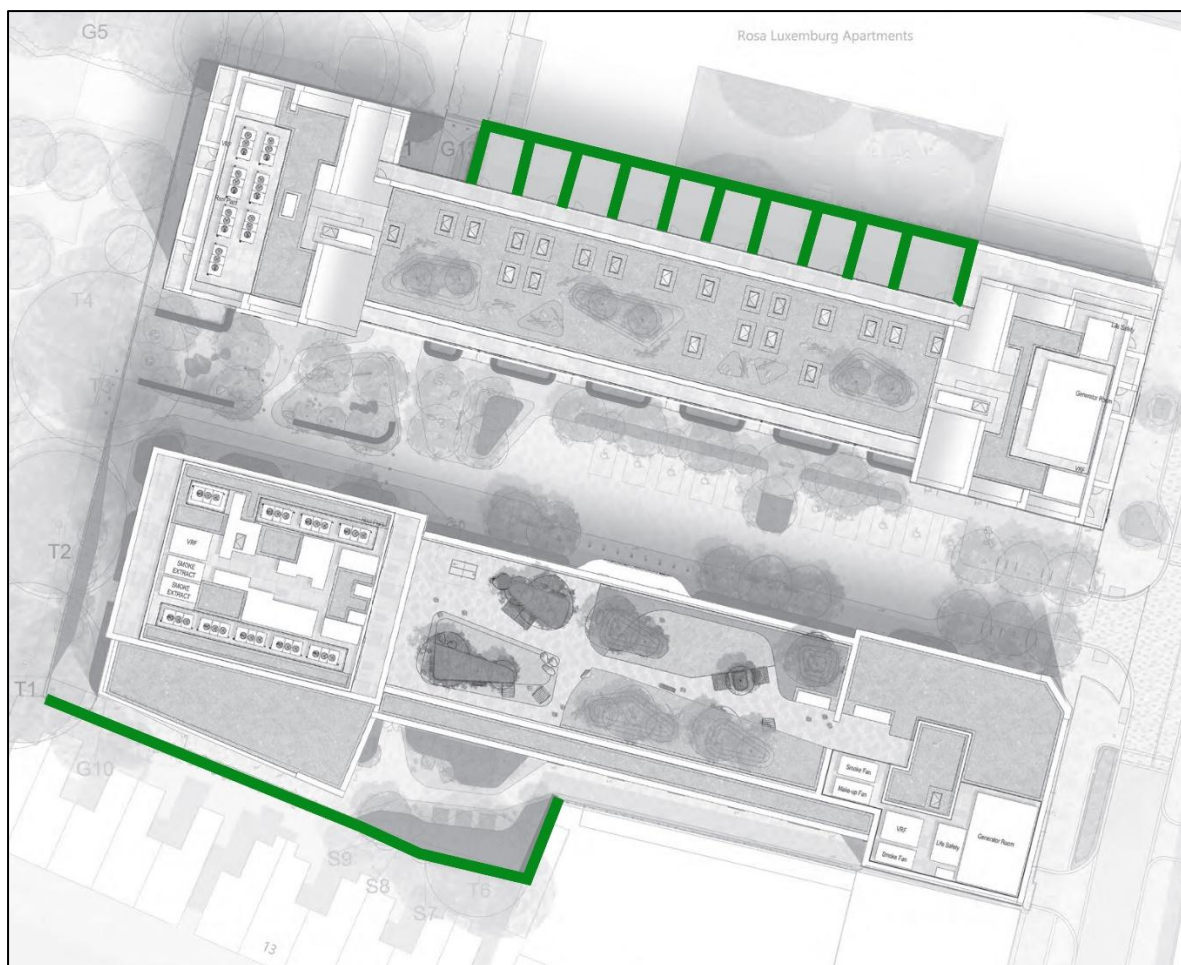


Figure 12 **Extent of Hedgerows Habitat** (from drawing 26.009-BOSK-ZZ-XX-RP-L-0004 P01)

Green Walls

- 168** The landscaping proposals for the Site include the provision of ground-based green wall habitat, with plants rooted at ground level and positioned to grow upwards on boundary fencing on the northern residential gardens. The proposed planting mix is unknown at this stage.
- 169** Due to the absence of detailed information, and as a precautionary approach, the green walls are expected to reach a poor ecological condition under the urban habitat condition assessment. Whilst the green wall infrastructure adds valuable structural complexity to the wider site, the vertical habitat parcels do not present internal structural variation in themselves, thereby failing to satisfy Criterion A. The habitat will likely also not satisfy the criteria associated with containing a diversity of plant species that are beneficial for wildlife, failing Criterion B. However, the habitat is expected to maintain an absence of invasive non-native species through appropriate ongoing management, passing Criterion C.
- 170** The location of this ground-based green wall habitat is identified in green in Figure 13, covering a total area of approximately 278 m².

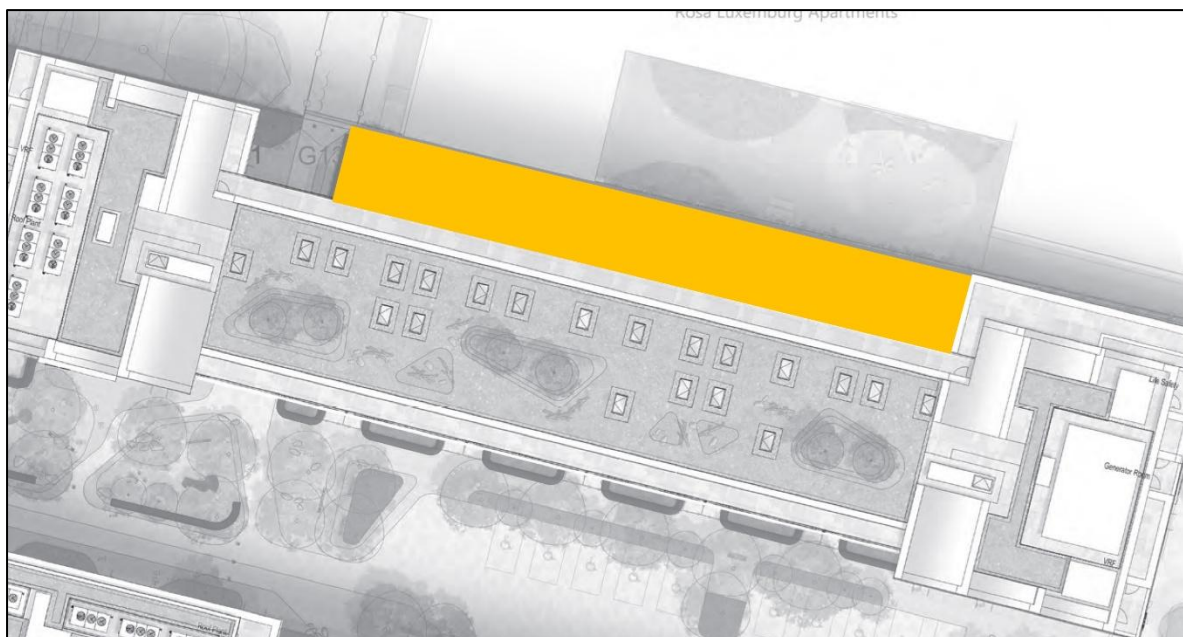
Figure 13 **Extent of Green Wall Habitat** (from drawing 26.009-BOSK-ZZ-XX-RP-L-0004 P01)



Vegetated Gardens

- 171** Vegetated garden habitat measuring 335 m² consists of the ground-floor private gardens associated with the proposed residential buildings, situated along the northern border of the Site. While these areas will likely be landscaped with amenity grassland, BNG guidance specifies that habitats within private gardens habitats should not be recorded individually in the BNG calculation and should be encompassed within the vegetated garden classification.
- 172** The extent of this habitat is shown in orange in Figure 14 below. Vegetated garden habitats do not require a condition to be identified as part of the BNG assessment.

Figure 14 **Extent of Vegetated Garden Habitat** (from drawing 26.009-BOSK-ZZ-XX-RP-L-0004 P01)



Species Enhancement

- 173** In addition to habitat enhancements, it is recommended that appropriate artificial habitat aids are incorporated into the development to aid species presence within the Site and support enhancement to the ecological functioning of the Site. The inclusion of artificial habitat aids is identified in CIRIA guidance⁴⁴ as having potential to make an important contribution to providing alternative wildlife refuges, enhancing the biodiversity value of developments cheaply and easily.
- 174** Additional value to the species enhancement can be provided by identifying appropriate nest boxes that target species of conservation concern locally, regionally or nationally. It is recommended that the following boxes are included in the design, the location of which should be considered as the development design evolves but should be achievable at a suitable location on the building facades or at roof level.

Bird Nesting Boxes

- 175** In general, bird nesting boxes should be fixed at least 2m above floor level and located on a façade that provides an aspect that faces between a north-east and south-east direction, however swift boxes should be affixed at 4-5m above ground level and ideally in areas overlooking or adjacent to green roofs.
- 176** Certain residential developments require all external façade materials, including artificial nest boxes, to comply with relevant fire safety regulations and achieve a minimum classification of Class A2 Non-Combustible. Therefore, depending on the requirements of the buildings, the appropriate box within the following recommendations should be included within the Proposed Development to provide enhancement opportunities for species that are of conservation concern locally and general opportunities for bird species:

⁴⁴CIRIA (2007) *BUILDING GREENER. Guidance on the use of green roofs, green walls and complementary features on buildings*. CIRIA Report C644. Construction Industry Research and Information Association, London.

- House sparrow:
 - *General recommendation*: 3x House Sparrow Terrace, e.g. 1SP Schwegler Sparrow Terrace or similar, for surface installation on the proposed buildings; or,
 - *Non-combustible alternative*: 3x Mesh Fronted Sparrow Terrace Box (Bird Brick Houses, Code: MFSPTER), integrated within the brick façade;
- Swift:
 - *General recommendation*: 2x Triple Cavity Swift Nest, e.g. No. 17A Schwegler Swift Nest Box or similar, for surface installation on the proposed buildings; or,
 - *Non-combustible alternative*: 4x Mesh Fronted Swift Box (Bird Brick Houses, Code: MFSW), integrated within the brick façade;
- General Species:
 - *General recommendation*: 3x generic species nest box, e.g. 1B Schwegler bird box, for inclusion within retained trees or on the Site boundary/buildings; or,
 - *Non-combustible alternative*: 3x Standard Mesh Fronted Bird Box (Bird Brick Houses, Code: MFSTB), integrated within the brick façade;

177 The surface-mounted boxes recommended are made of 'woodcrete' or 'woodstone', a breathable material that is durable and rot-proof with the lifespan of boxes typically in the region of 25 years, whilst the non-combustible boxes are constructed with non-galvanised stainless steel bodies for longevity and are designed to be built directly into the building façade and are finished with facing bricks which can match the developments façade.

Bat Roosts

- 178** Enhancement of the Site through the provision of artificial roosting aids is recommended to provide compensatory habitat for the loss of potential roost features within the Site and support establishment of the species within the Site, with increased foraging opportunities associated with landscape planting across the Site that will provide additional and diverse prey resources. To complement this, it is recommended that artificial roosting habitat is provided to increase the availability of high value roost habitat.
- 179** Artificial roosting habitat for bats is not species specific and differences in box types are often related to requirements for installation or conditions provided. As with the bird boxes, the type to be provided will depend on the fire regulation requirements for the building and comprise either:
- *General recommendation*: 3x 1FE Schwegler Bat Access Panel with optional back plate, or similar, to be provided across the Site and affixed to suitable areas of the building's façade;
 - *Non-combustible recommendation*: 3x Mesh Fronted Bat Box (Bird Brick Houses, Code: MFBB), integrated within the brick façade.
- 180** As with the bird boxes, the surface-mounted boxes recommended are made of 'woodcrete' or 'woodstone', a breathable material that is durable and rot-proof with the lifespan of boxes typically in the region of 25 years, whilst the non-combustible boxes are constructed with non-galvanised stainless steel bodies for longevity and are designed to be built directly into the building façade and are finished with facing bricks which can match the developments façade.
- 181** The boxes should be installed at a height of at least 3 m from the ground, with unobstructed access to the bottom of the box. As bats are legally protected from disturbance, the roost boxes should be located somewhere away from regular disturbance or illumination, which would deter bats from using the

artificial roost. The exact location of artificial bat roosts should be reviewed by a suitably qualified bat ecologist.

Invertebrate Habitat Aids

- 182** Invertebrates are an integral component of our environment, providing a number of vital ecosystem services including the pollination of flowers, recycling of organic material and as a valuable foraging resource. Habitat aids for invertebrates are relatively simple to provide and can be incorporated within landscaping in sheltered locations that receive direct sunlight. Habitat aids are not generally species specific, instead providing suitable sheltering opportunities for a range of species.
- 183** It is recommended that 5x artificial nesting aids, such as the Schwegler clay and reed insect nest or similar, are provided within the landscape planting across the green roofs and ground level to provide sheltering opportunities for invertebrates. Additionally, to comply with the condition criteria for biodiverse green roofs of good condition, these habitats should include artificial habitat feature in the form of stone, sand and/or log piles to provide additional habitat for invertebrates.

Biodiversity Value of the Developed Site

- 184** As part of the assessment, it is important to establish the definitions of two terms to ensure the calculation is appropriate and avoids confusion of terms used in the calculation methodology and project discussions. Therefore, for the purpose of the calculation, the following terms have been used:
- Habitat Enhancement – the improvement of the condition of an existing habitat, thereby increasing the biodiversity value of a habitat type. Enhancement is achieved through measures that improve habitat biodiversity capacity and/or remove factors that detract from its value;
 - Habitat Creation – the removal or loss of the present habitat in the action of creating the new one or creating habitat where none was previously present (including bare earth).
- 185** As a result, the proposals to include habitats as enhancements to the design are considered to be habitat creation in the calculation methodology. The planting types within the design have been assigned appropriate categories in line with the UK Habitat Classification and, where relevant, discussion on the habitat condition is included in the descriptions above.
- 186** The strategic significance for the Site is discussed as part of the methodology, with a low strategic significance attributed to the landscaping provided as part of the Proposed Development. The temporal risk factor, comprising the time between clearance of the Site and the commencement of landscape planting, has been based on the construction programme and is anticipated to be approximately two years, and as such, a delay of two years has been included within the metric.
- 187** The assessment of the proposed habitats and associated habitat units are presented in Table 12 which identifies the total biodiversity value of the habitats created to be 1.77⁴⁵ habitat units.

⁴⁵ Figures are presented as set out within the Statutory Metric. The rounding of figures within the Metric occasionally results in the sum of individual values not appearing to equal the presented total.

Table 12 Summary of the Post-Development Habitat Value

Habitat	Area (ha)	Distinctiveness	Condition	Strategic Significance	Delivery Risk	Time to Condition	Unit Value	
Area-Based Habitats								
Biodiverse green roof	0.1341	Medium	Good	Low Strategic Significance	Medium	12	0.70	
	0.0075		Moderate			7	0.03	
Other green roof	0.0195	Low	Condition Assessment N/A		Low	3	0.04	
Ground level planters	0.0334	Low	Condition Assessment N/A		Low	3	0.04	
Modified grassland	0.0165	Low	Poor		Low	3	0.03	
Urban tree	0.2239	Medium	Poor		Low	12	0.58	
Urban tree	0.0814	Medium	Moderate		Low	29	0.23	
Vegetated garden	0.0335	Low	Condition Assessment N/A		Low	3	0.06	
Ground based green wall	0.0278	Low	Poor		Medium	3	0.03	
Developed Land; sealed surface	0.48	Very Low	N/A		Low	0	0.00	
Total							1.77	
Hedgerow Habitats								
Non-native and ornamental hedgerows	0.08	Low	Poor	Low Strategic Significance	Medium	3	0.07	
Total							0.07	

Predicted Change in Biodiversity Value

- 188** The predicted change in biodiversity value as a result of the Proposed Development identifies that, based on the landscape proposals presented and assumptions made on likely target condition of proposed habitats without further detail on planting schedules at present, the Proposed Development can deliver a biodiversity net gain that complies with policy and legislative requirements. The proposals will secure a net gain in excess of the 10% requirement and it is anticipated to deliver a net gain of 10.58 % when compared to the baseline value (identified in Table 12), which satisfies the Trading Rules associated with the methodology, and thereby delivers on the 'like for like or better' principle, contingent on the delivery of the habitat specifications and management assumptions set out in this report.
- 189** Furthermore, the landscape proposals will deliver compliance with the Trading Rules associated with the methodology, compensating for the loss of baseline habitats in line with the requirements of the BNG methodology. Therefore, the assessment identifies that the scheme can meet statutory and planning policy requirements associated with biodiversity net gain, with final compliance to be secured through the statutory Biodiversity Gain Plan and long-term management.

Table 13 Change in Biodiversity Value as a Result of the Proposed Development

	Area Habitat Units	Hedgerow Units	Watercourse Units
Baseline Habitat Value	1.60	0.00	0.00
Value of Habitat Lost	1.60	0.00	-
Value of Habitat Retained	0.00	0.00	-
Value of Habitat Enhanced	0.00	0.00	-
Value of Habitat Created	1.77	0.07	-
Total Post-Development Habitat Value	1.77	0.07	-
Net Change (Biodiversity Units)	+0.17	+0.07	-
Percentage Net Change	10.58%	N/A	-

SUMMARY AND CONCLUSION

Baseline

- The site is not subject to any statutory or non-statutory designation, with no designated sites adjacent to the site. The closest designated site is Down Lane Park Local SIN, approximately 115 m north of the site, with the presence of Epping Forest SAC, located approximately 4.5 km from the Site, and the Lee Valley SPA and Ramsar, located approximately 575 m east of the site of particular note;
- The site does not support any notable habitats, comprising Priority Habitats under the UK Biodiversity Action Plan or ancient woodland;
- The site is characteristic of its urban context, comprising a vacant brownfield site with urban habitat types dominating. Ruderal/ephemeral habitat, sparsely vegetated urban land and introduced shrub has developed as a result of a lack of management following clearance of the site in 2023. The adjacent habitat includes a number of individual trees on the western and north-western boundaries;
- Introduced shrub vegetation and the adjacent trees provide potential nesting and foraging opportunities for bird species. While the site itself has negligible commuting, foraging and roosting potential for bats, one of the adjacent trees on the western boundary contains a PRF suitable for multiple bats (PRF-M) that requires further inspection to fully inform the potential for impacts;
- Floral species present are generally typical of vacant urban land, although the Schedule 8 protected plant Jersey cudweed was identified to be present. Additionally, the locally invasive butterfly bush was recorded throughout the site.

Impacts and Mitigation

- The Proposed Development will inevitably result in the loss of all habitats from the baseline; however, the habitats are generally of low biodiversity value and appropriate compensation in line with BNG requirements will be secured through the landscaping proposals within the development;
- The Proposed Development has potential for impacts upon Epping Forest SAC, primarily as a result of recreational impacts arising from residential development, and the Lee Valley SPA and Ramsar. These are considered through a sHRA and are not repeated in this assessment;
- The adjacent trees that are identified as suitable for retention should be protected during construction through the implementation of appropriate mitigation in line with British Standard 5837 and as instructed by an arboriculturist;

- The presence of Jersey cudweed within the site will require works to be completed under a Natural England Mitigation Licence, with the plants either removed from the site under licence or translocated to a suitable location of the site;
- Consideration should be given to sensitive timings for breeding birds in the programme, otherwise works should be preceded by a check by a suitably qualified ecologist and subsequent guidance followed; and
- The Proposed Development has potential for indirect impacts upon roosting bats, primarily as a result of proposed lighting during construction and operational phases of the development, but also as a result of construction activities and noise potentially disturbing any bats present. Appropriate mitigation has been identified, although this is subject to the findings of further surveys carried out to determine the presence/likely absence of roosting bats;

Enhancement

- Landscaping incorporated within the current proposals include areas of green roof, vegetated gardens, green walls, modified grassland, ground level planting and urban trees;
- The Proposed Development does not meet any of the exemption criteria set out within the Biodiversity Gain Requirements (Exemptions) Regulations 2024, and therefore it is expected that the mandatory BNG requirements will be required as a condition of planning permission;
- The landscape strategy delivers an increase in biodiversity value for area-based habitats compared to the baseline, and the on-site habitat creation and enhancement measures that satisfy the Trading Rules associated with the metric. The Strategy also delivers net gain for biodiversity, exceeding the statutory and policy requirements with a net gain in habitat of +10.58% when compared to the baseline habitat value;
- Recommendations have been made for the inclusion of faunal and floral species' enhancements that add further value to the ecological value within the final Proposed Development, of the site, although not contributing to the change in biodiversity habitat value score; and
- Best practice measures are recommended for the design and construction, including minimising light spill through the design on specific habitats and/or features that have been proposed as enhancements of habitat creation, control of dust and noise emissions, inclusion of pollution prevention control measures and management of surface water run-off and removal of invasive species.

APPENDIX A – Legislative and Policy Context

Legislation

Statutory Designated Sites

Statutory designation of sites for nature conservation derives from a number of international conventions, European Directives and national legislation, establishing the following framework of designations:

- Special Area of Conservation (SAC) – designated under the European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, transposed by the Conservation of Habitats and Species Regulations 2017 (as amended), for the conservation of particular habitats (listed on Annex I) and/or species (listed on Annex II) that are identified as being of European Importance;
- Special Protection Area (SPA) – designated under the European Council Directive on the Conservation of Wild Birds, transposed by the Conservation of Habitats and Species Regulations 2017 (as amended), for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex I of the Directive and migratory species);
- Ramsar – listed under the Convention on Wetlands of International Importance for the protection of internationally important wetland habitat, especially as waterfowl habitat. Whilst the sites are not directly legislated, the NPPF expects these to be given the same level of protection as SACs and SPAs;
- Site of Special Scientific Interest (SSSI) – designated under the Wildlife and Countryside Act 1981 (as amended) or the National Parks and Access to the Countryside Act 1949, on account of the sites being of special nature conservation interest for its plant/animal communities, habitats, geology or landform features;
- National Nature Reserve (NNR) – designated under the Wildlife and Countryside Act 1981 (as amended) as nationally important on account of its habitat, flora or fauna interest;
- Local Nature Reserve (LNR) – established under Section 24 of the National Parks and Access to the Countryside Act 1949 as locally important on account of its habitat, flora or fauna interest.

European Protected Species

The Conservation of Habitats and Species Regulations 2017 (as amended) affords protection to all European Protected Species (EPS) in England and Wales. Under this legislation it is an offence to deliberately capture, injure or kill individuals of any native EPS, a strict liability offence to damage or destroy sites or places which EPS use as a breeding site or resting place and an offence to deliberately disturb an EPS whereby the disturbance is likely to:

- a) impair its ability;
 - i. to survive, breed or reproduce, or to rear or nurture their young; or,
 - ii. in the case of animals of a hibernating or migratory species to hibernate or migrate; or,
- b) to affect significantly the local distribution or abundance of the species to which they belong.

Development licences are available from Natural England, under certain circumstances, that would allow activities that would otherwise be an offence under these Regulations. However, compliance with the licence methodology and conditions is important, with it being an offence to breach any condition imposed by any such licence.

EPS also receive partial protection through Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), through which it is an offence to intentionally or recklessly disturb an EPS whilst it is using a place of rest or shelter.

Flora

Section 13 of the Wildlife and Countryside Act 1981 (as amended) provides protection for all wild plants, which establishes an offence to uproot a plant without the permission from the land owner or occupier. Uprooting is defined in the Act as to '*dig up or otherwise remove the plant from the land on which it is growing*'.

Section 13 also establishes an offence to intentionally pick, uproot, destroy or trade in the higher and low plants plant species listed in Schedule 8 of the Act.

Section 14 of the Wildlife and Countryside Act 1981 (as amended) makes it an offence to plant or otherwise cause to grow in the wild the species identified in Schedule 9 of the Act. The protection was strengthened through Section 23 of the Infrastructure Act 2015, which enables environmental authorities to require works to be undertaken to remove or prevent their establishment.

The Environmental Protection Act 1990 establishes the requirement for licensed disposal of material containing Japanese knotweed (*Fallopia japonica*) and giant hogweed (*Heracleum mantegazzianum*), identifying such material as 'controlled waste' and requiring appropriate disposal.

Birds

Part 1 of the Wildlife and Countryside Act 1981 (as amended) provides legislative protection to all wild birds in England and Wales, making it an offence to intentionally kill, injure or take any wild bird, or take, damage or destroy the nest (whilst being built or in use) or its eggs. The Act also provides additional protection to those species listed in Schedule 1 from disturbance whilst it is building a nest, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

Section 10, Part 1 of the Conservation of Habitats and Species Regulations 2017 (as amended) places a requirement on local planning authorities in the exercising of their functions to have regard to '*the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the UK*'. As a result, it is important to consider any habitat loss as a result of development and opportunities for the provision of habitats.

Biodiversity Net Gain

The statutory requirement for biodiversity net gain comes from Schedule 7A of the Town and Country Planning Act 1990 (as amended), inserted by Schedule 14 of the Environment Act 2021 and enacted by The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024. Through this, unless exempt through the Biodiversity Gain Requirements (Exemptions) Regulations 2024, all developments are required to deliver a minimum 10 % net gain for biodiversity as a condition of planning approval.

Planning Policy

National

Planning policy at the national level is provided by the National Planning Policy Framework (NPPF) , which sets out the Government's economic, environmental and social planning policies for England and articulates the Government's vision for sustainable development.

Protection and enhancement of the natural environment is a key component of the environmental objective of the NPPF, including improving biodiversity, with planning policy relating to biodiversity contained within Policies N1-N6 within Chapter 19 on conserving and enhancing the natural environment.

Policy N1 requires development plans to safeguard and enhance the natural environment and reflect the wider benefits derived from natural capital and ecosystem services. In particular, development plans should:

- *"Identify opportunities for the conservation, enhancement and recovery of landscapes, sensitive waterbodies, habitats and priority or threatened species, including through habitat restoration, the use of nature-based solutions, and the creation and strengthening of ecological networks that are more resilient to current and future pressures (including opportunities which exist at a catchment or landscape scale across plan boundaries)."*

Policy N1 also requires planning authorities to steer development towards land of least environmental value where consistent with other policies of the Framework and to establish appropriate standards for green infrastructure provision.

Policy N2 states that, to contribute positively to the natural environment and support nature's recovery, development proposals should:

- *"Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site;*
- *Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) where possible;*
- *Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits; and*
- *Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs."*

Notably, Policy N2 introduces a specific requirement that: "Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective."

Policy N2 also establishes the biodiversity mitigation hierarchy, stating that: "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 the development should be refused."

The NPPF further recognises the statutory biodiversity net gain framework, confirming that development proposals may provide biodiversity enhancements beyond the statutory requirement, but that additional gains should only be required where justified through specific, up-to-date development plan policies.

Policy N3 recognises the importance of trees for biodiversity, climate change resilience and placemaking and requires development proposals to: "Make new streets tree-lined (unless there are strong reasons why this would be inappropriate in specific streets), and incorporate trees in other suitable locations" whilst ensuring the long-term management and maintenance of both existing and newly planted trees.

Policy N4 seeks to conserve and enhance the special qualities of National Parks, and National Landscapes. The policy states that: "Development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to the statutory purposes and special qualities of the Protected Landscape."

It further confirms that "Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks."

Policy N6 provides protection for internationally, nationally and locally designated sites. In relation to Sites of Special Scientific Interest (SSSIs), development should only be supported where:

- *"There would be no adverse effect (either individually or in combination with other developments) on the site's features of special scientific interest"; or where:*
- *"The benefits of the development in the location proposed clearly outweigh both the likely impact on the features of special scientific interest, and any broader impact on the national network of Sites of Special Scientific Interest."*

Policy N6 also confirms that:

"Development proposals which would entail the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists."

The NPPF is supported by Planning Practice Guidance, provided by the Department for Levelling Up, Housing and Communities, which provides further guidance on biodiversity, green infrastructure and biodiversity net gain. Of particular note, Paragraph 018 (Reference ID: 8-018-20240214) identifies that biodiversity information should inform all stages of development, with applications informed by an ecological survey where the type or location of development could have a significant impact on biodiversity. Additionally, Paragraph 018 identifies that detailed species surveys should only be required by local planning authorities where clearly justified, with assessments proportionate to the nature and scale of development proposals and their impact on biodiversity.

Within the Biodiversity Net Gain information, Paragraph 011 (Reference ID 74-011-20240214) identifies the minimum information required to be submitted as part of a planning application where the biodiversity net gain condition is likely to apply to the development.

Regional

The London Plan⁴⁶ provides strategic planning policy for Greater London, setting out an integrated economic, environmental, transport and social framework for the development of London over 20 – 25 years.

The principal policy for biodiversity is provided by Policy G6, Biodiversity and Access to Nature, which requires the protection of Sites of Importance for Nature Conservation (SINCs) or, where this is unavoidable and the benefits of the development clearly outweigh the impacts on biodiversity, minimise impacts through the application of the mitigation hierarchy (avoid, minimise and mitigate, compensate). The policy also requires development proposals to manage impacts on biodiversity and secure net biodiversity gain, informed by the best available ecological information and addressed from the start of the development process, with those reducing deficiencies in access to nature considered positively.

Additional policies of potential relevance include:

- Policy D7, Public Realm, encourages the creation of new public realm and incorporation of green infrastructure such as street trees and other vegetation that supports rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity;
- Policy G1, Green Infrastructure, requires the protection of London's network of green and open spaces and green features in the built environment, with development proposals expected to

⁴⁶ Greater London Authority (2021) *The London Plan. The Spatial Development Strategy for Greater London, March 2021.*

incorporate appropriate elements of green infrastructure that integrate into London's wider green infrastructure network;

- Policy G5, Urban Greening, establishes the requirement for major development proposals to contribute to the greening of London through the adoption of measures as a fundamental element of design and demonstrated through an Urban Greening Factor appraisal; and,
- Policy G7, Trees and Woodland, requires development proposals to ensure, wherever possible, existing trees of value are retained and, where removal is necessary, adequate replacement is made.

The Greater London Authority are currently working on a new Local Plan to replace the current version, and whilst this is not currently the adopted development plan it may be a material consideration in planning applications. The draft Plan consultation runs from July 2026 to October 2026, with review in light of responses following this and whilst the policies contained within the draft Plan may be subject to alteration the draft London Plan⁴⁷ provides an indication of the policy intention.

The principle policies of potential relevance comprise:

- GHR6: Trees, biodiversity and geodiversity, which requires development to: deliver new tree planting; protect trees of value or, where unavoidable, provide an adequate replacement; contribute to London's nature recovery by protecting SINCs; deliver gains for biodiversity in line with national BNG requirements; utilise the Local Nature Recovery Strategy and the London Green Infrastructure Framework to inform habitat creation proposals; and reduce deficiencies in access to nature.
- GHR7: Green infrastructure and Urban Greening Factor, which requires development to respond positively to existing green infrastructure assets and seek to enhance their functionality and deliver strategic green infrastructure opportunities identified and other locally identified interventions. Major development is required to use the Urban Greening Factor to demonstrate how appropriate amounts and types of greening have been provided to meet the target score.

Local

Local planning policy is currently derived from the Haringey's Local Plan Strategic Policies 2013-2026⁴⁸, adopted in March 2013, and Development Management DPD⁴⁹, adopted in July 2017. The Plan sets out the council's vision, strategy, objectives and policies for planning and development in Haringey and includes policies for deciding development management decisions.

The Local Plan includes a single Strategic Policy relating to biodiversity, which requires all developments to:

- Protect, enhance and where possible extend the borough's Green Belt, statutory and non-statutory designations (including SINCs and LNRs), green chains, allotments and other important green spaces;
- Manage the impact of new developments in areas adjacent to designated open spaces and seek to improve enhance and manage the quality and access of the green spaces;
- Contribute to wildlife and ecological habitats including green and brown roofs, rainwater harvesting, green walls, bird and bat nesting/roosting opportunities and plant new trees where appropriate.

The Development Management DPD sets out further policy in relation to biodiversity and how the strategic policy should be implemented, including:

- Policy DM19: Nature Conservation:

⁴⁷ Greater London Authority (2026) *The draft London Plan. The Spatial Development Strategy for Greater London*, July 2026.

⁴⁸ London Borough of Haringey (2013) *Haringey's Local Plan Strategic Policies 2013-2026 (formerly the Core Strategy)*, March 2013.

⁴⁹ London Borough of Haringey (2017) *Haringey's Local Plan Development Management DPD*, July 2017.

- Development proposals on sites which are, or are adjacent to, internationally designated sites, Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation or Ecological Corridors, should protect and enhance the nature conservation value of the site;
- Development that has a direct or indirect adverse impact upon important ecological assets, either individually or in combination with other development, will only be permitted where:
 - a) the harm cannot be reasonably avoided; and
 - b) it has been suitably demonstrated that appropriate mitigation can address the harm caused.
- Policy DM21: Sustainable Design, Layout and Construction;
 - All new development, including building and landscape works, will be expected to consider and implement sustainable design, layout and construction techniques. Proposals should:
 - c) Maximise opportunities to enhance biodiversity on-site, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls.

A New Local Plan⁵⁰ is currently being developed, and draft plans have been released with policies relating to biodiversity outlined below;

Policy G1: Green and Blue Infrastructure

- Protecting and enhancing the borough's biodiversity, including designated and undesignated sites, and delivering biodiversity net gain
- Consider opportunities to protect, enhance and increase provision of green and blue infrastructure from the earliest stage of the planning and design process;
- Promote access to, and strengthen the network of, green and blue infrastructure in the borough and across London, reducing inequalities in the ability for people to experience and enjoy such spaces;
- Optimise the multi-functionality of green and blue spaces in a way which supports nature but also provides for the needs and aspirations of the borough's communities.

Policy G4: Urban Greening

- All development proposals should integrate green infrastructure and provide for urban greening. Green infrastructure should be considered at an early stage of the design process and be incorporated as part of an integrated design approach;
- Any new urban greening element should be locally appropriate and focus on tackling the climate emergency and/or help avoid or mitigate the impacts of the proposed development on biodiversity by providing greening that complements the site's existing wildlife value and that will achieve an overall gain in biodiversity;
- Roof loading must be able to support the weight of living roofs plus other equipment such as solar and heat pumps. The Council supports biodiverse living roofs which are substrate based and plug planted and seeded with wildflowers. Sedum blanket roofs are not supported as they do not offer biodiversity benefits

Tottenham Area Action Plan

In July 2017 the Tottenham Area Action Plan⁵¹ was adopted to provide additional planning guidelines and policies to help regeneration, local housing, employment opportunities and transport improvements and contains Site allocations in which the Proposed Development falls within 2 of the allocations:

⁵⁰ London Borough of Haringey (2025) *The New Local Plan*. Accessible through <https://haringey.gov.uk/planning-building-control/planning/planning-policy/local-plan/new-local-plan-2025>

⁵¹ Haringey London Council. (2017) *Tottenham Area Action Plan (July 2017)*.

TH5 Station Square North and TH6 Ashley Road South Employment Area

- Developments should positively benefit the link between the Down Lane Park to the west and the Lea Valley in the east through providing active frontages along its length, which will contribute to the Green Grid. Down Lane Park must be treated with care to ensure the park's amenity is improved.

Local Ecological Initiatives

Biodiversity Frameworks and Action Plans

National

The UK Biodiversity Framework⁵², which supersedes the Post-2010 Biodiversity Framework⁵³, establishes four key objectives for cross-UK work relating to biodiversity policy and supporting evidence. As with the Post-2010 Biodiversity Framework, it is assumed that the priority habitats and species, reported under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, remain conservation priorities for the UK.

Each component country in the UK is responsible under the Biodiversity Framework for developing their own policy towards meeting international biodiversity commitments, with those for England communicated through the Environmental Improvement Plan 2023⁵⁴. The overarching aim of this plan in relation to biodiversity is to 'achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife' with the targets to halt the decline and increase species abundance, restore or create wildlife rich-habitat and increase tree canopy and woodland cover.

Regional

The London BAP⁵⁵, prepared by the London Biodiversity Partnership, aimed to protect and enhance London's biodiversity, ensuring rare species are maintained and common species remain common thereby contributing to the maintenance of national and global biodiversity. Whilst the partnership has disbanded, the aims of the plan remain relevant with the priority habitats and species continuing to be considered conservation priorities for London. The habitats and species of potential relevance to the site include:

- Habitats: parks and urban greenspaces; tidal Thames; built structures.
- Species: bats; house sparrow (*Passer domesticus*); black redstart (*Phoenicurus ochruros*); dunnock (*Prunella modularis*), peregrine (*Falco peregrinus*), song thrush (*Turdus philomelos*), spotted flycatcher (*Muscicapa striata*), starling (*Sturnus vulgaris*) and hedgehog (*Erinaceus europaeus*).

Local

Haringey updated their Biodiversity Action Plan in August 2022⁵⁶ which aims to 'fulfil its biodiversity duty by highlighting priorities and opportunities for protecting and enhancing the borough's biodiversity.' The strategy has 3 core aims:

- Inclusion and wellbeing: equal access to parks and greenspaces for the whole community
- Climate change and Sustainability: reduce carbon footprint of parks and greenspaces and protect and promote biodiversity; and,

⁵² JNCC on behalf of the Four Countries' Biodiversity Group (4CBG) (2024) UK Biodiversity Framework. JNCC, Peterborough.

⁵³ JNCC and Defra (on behalf of the Four Countries' Biodiversity Group) (2012) UK Post-2010 Biodiversity Framework. July 2012.

⁵⁴ Department for Environment, Food and Rural Affairs (2023) Environmental Improvement Plan 2023. First Revision of the 25 Year Environment Plan.

⁵⁵ London Biodiversity Partnership (2007) London Biodiversity Action Plan. Access through www.gigl.org.uk

⁵⁶ Haringey Council (2022) Biodiversity Action Plan. People Need Parks. August 2022

- A Quality Service: secure investment, improve standards, partnerships, communications and outcomes.

The strategy reiterates the importance of the biodiversity policies within the current local plan and used this as a framework to creation action plans for each of the core aims. Relevant action plans include:

- establish an interdepartmental coordinating group with representation from different stakeholders and governing bodies;
- increase green spaces in new developments and pocket parks by 250sqm each year;
- increase tree canopy cover from 25% to 305 in Haringey;
- encourage the implementation of SuDS;
- require all new builds to incorporate high quality green roods as standard;
- ensure biodiversity benefits are maximised within landscaping proposals in planning applications;
- provide specialist arboriculture advice on planning applications;
- increase the biodiversity of Homes for Haringey open spaces and road-side verges;
- protect and enhance features for London BAP priority species e.g. house sparrows, bats, bees swifts;
- retain undisturbed dead wood on site wherever possible and instal invertebrate aids and bird and bat boxes;
- ensure the benefits to wildlife are considered when decisions are made to remove ivy from trees and walls; and
- become chemical and pesticide free.

The Haringey Council created an additional Parks and Greenspaces Strategy in 2023⁵⁷ for the next 15 years which sets out their vision and priorities for the parks and green spaces within the London Borough and includes the Biodiversity Action Plans within its strategy.

Local Strategies

Local Nature Recovery Strategy

The LNRS for London⁵⁸, published by the Greater London Authority (GLA) in March 2026, sets out the priorities for biodiversity recovery or enhancement and proposals for potential measures. The LNRS sets out 6 principles, 30 biodiversity priorities with 22 primary measures and 37 species-specific measures. The biodiversity priorities relating to the urban environment include the unmapped measure to *'restore, expand, create and connect spaces for nature in more urban environments. This particularly includes nature-positive features in/on buildings, and well-designed, nature friendly lighting'* and in relation to trees and hedgerows to *'expand hedgerow and tree cover outside of woodlands, especially on streets in areas of low canopy cover and habitat connectivity, and improve resilience of existing tree populations and hedgerows'*

The LNRS does not identify the site as having potential for nature recovery for a particular LNRS priority nor identify the site as being of particular importance for biodiversity.

London's Living Landscape

London's Living Landscape initiative⁵⁹ has been set up by the London Wildlife Trust as a *'recovery plan for nature'* that seeks to protect, conserve and enhance London's wildlife and draws on five key principles:

⁵⁷ Haringey Council (2023) Haringey's Parks and Greenspaces Strategy. People Need Parks. August 2023

⁵⁸ Greater London Authority (2026) London Local Nature Recovery Strategy. March 2026.

⁵⁹ London Wildlife Trust (2014) London's Living Landscapes. A recovery plan for nature. London Wildlife Trust, London.

- Protect and conserve biodiversity, and where possible deliver net wildlife gain;
- Connect Londoners to their local natural greenspace;
- Connect local greenspaces to the wider landscape of London;
- Connect nature conservation and greenspaces to the wider sustainability agenda;
- Work in partnership to deliver these objectives.

Securing the protection of existing ecological assets is a key aim for the initiative, however establishing green links across London's fragmented landscape is a particular challenge for nature conservation. The initiative looks to establish strong connectivity between greenspaces, which will enhance the delivery of ecosystem services such as improved air quality, temperature amelioration and enhancement of wildlife populations.

APPENDIX B – Ground Level Tree Assessment



Ashley Park

Ground Level Tree Assessment

Prepared for:
Re:shape T Ltd

Date:
August 2026

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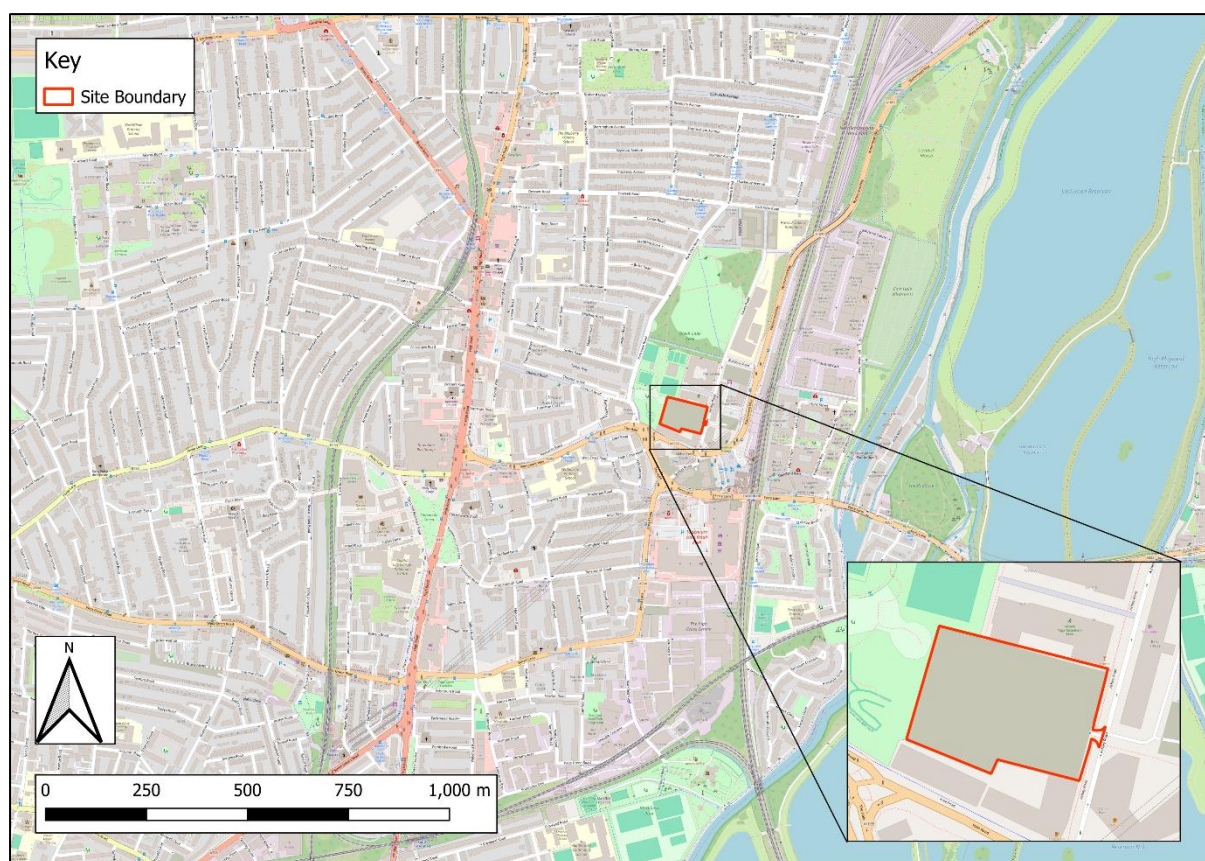
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INTRODUCTION

- 1 ReShape (hereinafter referred to as the 'Applicant') is seeking full planning permission for the proposed redevelopment of the former Ashley House site, located to the west of Ashley Road, south of the Rosa Luxemburg residential building, east of Down Lane Park and north of a number of residential properties along Hale Road. The site covers a total area of 0.7 hectares (ha) and falls within the administrative boundary of the London Borough of Haringey (LBH).
- 2 The existing site comprises a vacant brownfield land, with the previous existing buildings having been demolished in August 2023.
- 3 The scheme proposals (hereafter referred to as the Proposed Development) will provide for:
'Full planning permission for a phased mixed-use development comprising: (i) enabling works and operations; (ii) residential development (Use Class C3) including affordable housing; (iii) shared living accommodation (Sui Generis), (iv) commercial and community floorspace (Use Classes E and F2); and (v) site-wide and/or phase-specific access, servicing, public realm, blue-badge parking, cycle parking, open space, hard and soft landscaping, utilities, plant and all other associated works'.
- 4 Figure 1 identifies the Site location and redline planning application boundary.

Figure 1 **Site Location** (contains map data from OpenStreetMap)



Purpose

- 5 This Ground Level Tree Assessment (GLTA) report seeks to determine the actual or potential presence of bats, establish the effects of the Proposed Development upon valued biodiversity receptors, identify appropriate mitigation measures to ensure the protection of valued and legally protected species and

establish enhancement opportunities within the design and through recommendations that deliver an enhancement for bats.

- 6 Initial versions of the GLTA report will serve to communicate the ecological constraints and opportunities relating to bats to the design team for consideration in the development of proposals, and will be updated through the evolution of the design to reflect changes in the proposals and accompany the planning application for the proposed development.

Scope

- 7 The GLTA seeks to achieve its purpose through the following Scope of Works:
- Assess the suitability of the trees within the zone of influence of the Proposed Development to support roosting bats;
 - Map the suitability of each tree along with any PRFs identified present within the zone of influence of the Proposed Development;
 - Identify the requirement for and scope of further targeted surveys required to accompany a planning application;
 - Appraise the effects of the proposed development upon bats and identify mitigation measures required to negate or minimise adverse effects;
 - Outline measures proposed to enhance the biodiversity value of the Proposed Development and strategy for compliance with the mandatory and policy requirements for biodiversity net gain.

Declaration of Conformity

- 8 The GLTA has been led and carried out by Amie Humphries MSc BSc (Hons) ACIEEM. Amie has six years' professional consultancy experience and holds a Bat Level 1 Survey Class License (2022-10226-CL17-BAT). The report has been reviewed by Tom Hall MEnvSci CEnv MCIEEM, who holds over 20 years' professional consultancy experience. Tom holds an undergraduate master's degree in Environmental Science, full membership of the Chartered Institute of Ecology and Environmental Management (CIEEM) and Chartered Environmentalist status.
- 9 I can confirm that the information and assessment provided in this Ecological Appraisal is an accurate and realistic assessment of site conditions and potential supporting value, and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. Consideration has been given to best practice guidance in the completion of the appraisal, including British Standard 42020 and appropriate assessment guidance.



Tom Hall MEnvSci CEnv MCIEEM.

Period of Validity

- 10 In line with CIEEM guidelines¹, the reporting is considered to be valid for a period of 12 months from the completion of the survey on 5th August 2026. The licence associated with the desk study data identifies a period of 12 months for use of the associated data. Following on from this, any reliance on

¹ CIEEM (2019) Advice Note: On the lifespan of ecological reports and surveys. Chartered Institute of Ecology and Environmental Management, Winchester.

the information may need to be subject to an update, including survey to assess the findings and data search to consider any new species information available.

LEGISLATIVE AND POLICY CONTEXT

Legislation

- 11 The Conservation of Habitats and Species Regulations 2017 (as amended)² affords protection to all bat specie in the UK. Under this legislation it is an offence to deliberately capture, injure or kill individuals, a strict liability offence to damage or destroy sites or places which bats use as a breeding site or resting place and an offence to deliberately disturb a bat whereby the disturbance is likely to:
 - impair its ability:
 - to survive, breed or reproduce, or to rear or nurture their young; or,
 - in the case of animals of a hibernating or migratory species to hibernate or migrate; or,
 - to affect significantly the local distribution or abundance of the species to which they belong.
- 12 Development licences are available from Natural England, under certain circumstances, that would allow activities that would otherwise be an offence under these Regulations. However, compliance with the licence methodology and conditions is important, with it being an offence to breach any condition imposed by any such licence.
- 13 Bats also receive partial protection through Schedule 5 of the Wildlife and Countryside Act 1981 (as amended)³, through which it is an offence to intentionally or recklessly disturb an EPS whilst it is using a place of rest or shelter.
- 14 Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006⁴ requires public bodies to take steps, as far as reasonably practicable, to further the conservation of species and habitats identified and meet their 'biodiversity duty', introduced by the Environment Act 2021, including through their decision making. The species listed under Section 41 include barbastelle (*Barbastellus barbastellus*), Bechstein's (*Myotis bechsteinii*), noctule (*Nyctalus noctula*), soprano pipistrelle (*Pipistrellus pygmaeus*), brown long-eared bat (*Plecotus auritus*), greater horseshoe bat (*Rhinolophus ferrumequinum*) and lesser horseshoe bat (*Rhinolophus hipposideros*).

Planning Policy

Planning policy at the national level is provided by the National Planning Policy Framework (NPPF)⁵, which sets out the Government's economic, environmental and social planning policies for England and articulates the Government's vision for sustainable development.

Protection and enhancement of the natural environment is a key component of the environmental objective of the NPPF, including improving biodiversity, with planning policy relating to biodiversity contained within Chapter 15 on conserving and enhancing the natural environment. Paragraph 187 includes the requirement that "*planning policies and decisions should contribute to and enhance the natural and local environment by:*

- *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and*

² The Conservation of Habitats and Species Regulations 2017 (as amended). His Majesty's Stationary Office (HMSO).

³ The Wildlife and Countryside Act 1981 (as amended). His Majesty's Stationary Office (HMSO).

⁵ Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework. December 2024.

incorporating features which support priority or threatened species such as swifts, bats and hedgehog”.

Paragraph 192 of the NPPF states that “to protect and enhance biodiversity and geodiversity, plans should:

- *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Paragraph 193 of the NPPF relates specifically to biodiversity principles local planning authorities should apply when determining planning applications, which include:

- *“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.*

The NPPF is supported by Planning Practice Guidance⁶, provided by the Department for Levelling Up, Housing and Communities, which provides further guidance on biodiversity, green infrastructure and biodiversity net gain. Of particular note, Paragraph 018 (Reference ID: 8-018-20240214) identifies that biodiversity information should inform all stages of development, with applications informed by an ecological survey where the type or location of development could have a significant impact on biodiversity. Additionally, Paragraph 018 identifies that detailed species surveys should only be required by local planning authorities where clearly justified, with assessments proportionate to the nature and scale of development proposals and their impact on biodiversity.

- 15 The London Plan⁷ provides strategic planning policy for Greater London, setting out an integrated economic, environmental, transport and social framework for the development of London over 20 – 25 years. The principal policy for biodiversity is provided by Policy G6, Biodiversity and Access to Nature, which requires development proposals to manage impacts on biodiversity, informed by the best available ecological information and addressed from the start of the development process. Additionally, the Policy requires boroughs, in developing Development Plans, to support the protection and conservation of priority species that sit outside the SINC network and promote opportunities for enhancing them using Biodiversity Action Plans.
- 16 The Greater London Authority are currently working on a new Local Plan to replace the current version, and whilst this is not currently the adopted development plan it may be a material consideration in planning applications. The draft London Plan⁸ includes a similar protection to the London Plan, with Policy GHR6 on Trees, biodiversity and geodiversity requiring development to support the protection, creation, improvement and connection of priority species and habitats outside the SINC network.
- 17 Local planning policy is currently derived from the Haringey Local Plan Strategic Policies⁹ and Development Management DPD¹⁰, with the principal policy relating to biodiversity provided in Strategic Policy SP13 on Open Space and Biodiversity and DM19 on Nature Conservation, which requires development to mitigate direct and indirect adverse impacts upon important ecological features.

⁶ Ministry of Housing, Communities and Local Government (2016) Planning Practice Guidance. Last updated February 2024.

⁷ Greater London Authority (2021) The London Plan. The Spatial Development Strategy for Greater London, March 2021.

⁸ Greater London Authority (2026) The draft London Plan. The Spatial Development Strategy for Greater London, July 2026.

⁹ London Borough of Haringey (2013) Haringey's Local Plan Strategic Policies 2013-2026 (formerly the Core Strategy), March 2013

¹⁰ London Borough of Haringey (2017) Haringey's Local Plan Development Management DPD, July 2017

Ecological Initiatives

- 18 Both the London Biodiversity Action Plan¹¹ identifies all bats as priority species for conservation within their respective areas, whilst the Haringey Biodiversity Action Plan¹² requires the protection and enhancement of features for London BAP priority species.

METHODOLOGY

British Standard 42020: Biodiversity – Code of Practice for Planning and Development

- 19 British Standard (BS) 42020¹³ on biodiversity provides an industry standard for biodiversity assessment, reporting and decision making, ensuring high-quality ecological information is available to enable effective decision-making, legal and policy compliance, successful implementation of mitigation and enhancement measures and the achievement of desired outcomes. To achieve this, BS 42020 sets out a framework that seeks to: promote transparency and consistency in the quality and appropriateness of information; provide greater confidence to planning authorities and other regulatory bodies in the information they receive with which to make decisions; and, encourage proportionality in requirements and promote a good environmental legacy through development.
- 20 Key aspects in the delivery of biodiversity consultancy include the following:
- collaborative approach between ecologists and landscape architects as part of an interdisciplinary team;
 - proportionality, ensuring provision of adequate information appropriate to the environmental risk of the development and its location;
 - objective professional judgement, clearly justified through documented reasoning;
 - application of the mitigation hierarchy as a fundamental approach to decision making.

Field Survey

Daytime Bat Walkover

- 21 The potential for the site to support bats has been subject to an initial appraisal, reported in the Ecological Appraisal, through the completion of a Daytime Bat Walkover in line with the latest best practice guidance¹⁴. However, as the findings of the further surveys are based on a more detailed inspection of the features potentially present, the findings of the GLTA assessments supersede the initial appraisal.

Ground Level Tree Assessment

- 22 A GLTA was undertaken to provide a detailed inspection of the trees on the site from ground level in order to identify Potential Roosting Features (PRFs) that may be suitable for use by roosting bats. The assessment considers the availability of roosting resources within the survey area and informs the

¹¹ London Biodiversity Partnership (2007) London Biodiversity Action Plan. Access through www.gigl.org.uk

¹² Haringey Council (2022) Biodiversity Action Plan. People Need Parks. August 2022

¹³ British Standards Institute (2013) British Standard 42020: Biodiversity – Code of Practice for Planning and Development. BSI, London.

¹⁴ Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

requirement for any further survey effort and/or mitigation measures. The types of PRF that may form in trees are identified in Table 2, which is adapted from the Bat Tree Habitat Key¹⁵.

Table 1 PRF Types That Can Be Exploited by Bats and How They Form

PRFs formed by Disease and Decay	PRFs formed by Damage	PRFs formed by Association
Woodpecker holes Squirrel holes Knot holes Pruning cuts Tear outs Wounds Cankers Compression forks Butt rots	Lightning strikes Hazard beams Subsidence cracks Shearing cracks Transverse snaps Welds Lifting bark Desiccation Fissures Frost cracks	Fluting Ivy

- 23** For each tree identified as having potential suitability to support roosting bats, information was recorded including species, age class, and height, together with a photograph of each tree and a mapped location. Each PRF identified during the survey was given a unique identification reference.
- 24** As trees do not readily align with the suitability categories provided within Table 1 for buildings and structures, the following suitability categories set out with the Bat Conservation Trust (BCT) guidance were applied:
- None – either no Potential Roost Features (PRFs) in the tree or highly unlikely to be any;
 - FAR – Further Assessment Required to establish if PRFs are present in the tree; and,
 - PRF – A tree with at least one PRF present.
- 25** Trees identified as having no bat roosting potential were not recorded during the survey. Trees identified as supporting PRFs or assessed as requiring further assessment (FAR) were recorded and mapped accordingly.
- 26** It is recognised that some PRFs may not be visible from ground level. Therefore, in accordance with current best practice guidance, only trees that could be thoroughly inspected from the ground with a high degree of confidence that no PRFs were present were classified as having no suitability for roosting bats.
- 27** Where a PRF could be assessed from the ground with a reasonable level of confidence, despite being inaccessible for close inspection (for example fissures or cavities viewed using binoculars and a high-powered torch), suitability classifications were assigned based on the evidence available, whilst acknowledging that further aerial inspection or ‘truthing’ surveys may be required where impacts to the tree are proposed.
- 28** Where all PRFs present on an individual tree could be fully inspected from ground level, including by the use of torches or endoscopes where necessary, the tree was assigned an appropriate suitability category in line with best practice guidance as per the following or was downgraded to ‘None’ where detailed inspection confirmed the features to be unsuitable for roosting bats:
- PRF-I – PRF is only suitable for individual bats or very small numbers of bats, either due to size or lack of suitable surrounding habitats;
 - PRF-M – PRF is suitable for multiple bats and may therefore be used by a maternity colony.

¹⁵ Bat Tree Habitat Key (2018) Bat Roosts in Trees. A guide to identification and assessment for tree-care and ecology professionals. Pelagic Publishing.

- 29 The walkover survey was undertaken on 14th May by Amie Humphries MSc BSc (Hons) ACIEEM, on a dry, clear day with a temperature of 18°C.

Limitations

- 30 The GLTA draws on a number of sources and methods on which the biodiversity value and potential of the site is derived, following best practice guidance and utilising up-to-date information, and thus is not considered to give rise to any significant limitations as a result.
- 31 Ecological surveys inherently provide a snapshot in time, and conditions will change over time that will alter the conditions associated with the features/potential features present or introduce new features. The assessment has been completed at an appropriate time and within suitable timescales, and whilst some aspects may be missed, the information gathered is sufficient to assess the value and associated risks. The mitigation also takes into account the potential for the site to change, with recommendations made to address this potential and reference given to CIEEM guidance in relation to the period of validity for surveys.

RESULTS

Field Survey

Foraging and commuting habitat

- 32 The site itself is of limited suitability for commuting and foraging bats, with the vegetation only recently established, and offers relatively few habitat features likely to support significant bat activity. However, several trees and vegetated margins are present adjacent to the site, providing some limited foraging opportunities and local connectivity. The wider landscape contains habitats of higher value for bats, notably the River Lee and the Walthamstow Wetlands to the east of the site. Down Lane Park to the north also provides additional foraging habitat within the local area. Consequently, while the site itself is considered to be of low suitability for foraging and commuting bats, its proximity and connectivity to other suitable habitat means that bat activity is likely to occur within the site, particularly along vegetated boundaries and routes connecting to nearby watercourses and wetland habitats. Therefore, the site is of **moderate** value for commuting and foraging bats.

Trees

- 33 A feature was identified on the main stem of a Norway Maple (*Acer platanoides*) (T1 on Figure 2), located immediately outside the western site boundary. The feature comprises a substantial fissure originating approximately 1.5 m above ground level and extending into a large internal cavity within the stem. The fissure entrance measures approximately 5 cm wide by 20 cm high. The sheltered nature of the opening and the associated cavity provide potential roosting opportunities for bats by offering suitable void space, protection from adverse weather conditions, stable microclimatic conditions, and refuge from predators. Consequently, this tree was assigned a bat roost suitability category of **PRF-M** (suitable for multiple bats)
- 34 The knot holes identified during the Preliminary Ecological Appraisal (PEA) on a second Norway maple (T2 on Figure 2) were considered too shallow to provide suitable roosting opportunities for bats. Consequently, this tree was assigned a bat roost suitability category of **None**.
- 35 The tree locations are identified on Figure 2.

Figure 2 Ground Level Tree Assessment Survey Results (contains map data from OpenStreetMap)



Further Surveys and Assessment

Trees

- 36** The following targeted surveys are required to further assess the suitability of the trees for bat species to be present and consider the potential impacts of the Proposed Development:
- Trees with negligible or no suitability require no further survey or mitigation at the current time. However, if more than 12 months pass before works are undertaken that could impact bat roosts, then a follow up survey is recommended to determine if the suitability of trees has changed.
 - In accordance with current good practice¹⁶, three PRF inspections of the feature should be undertaken during the bat active season (May to September inclusive), with two being conducted between May and August. The inspections should comprise a detailed examination of the cavity by a suitably licensed bat ecologist using an endoscope to determine the presence or likely absence of roosting bats. The findings of the inspections should be used to inform the need for mitigation, further survey effort and any licensing requirements.

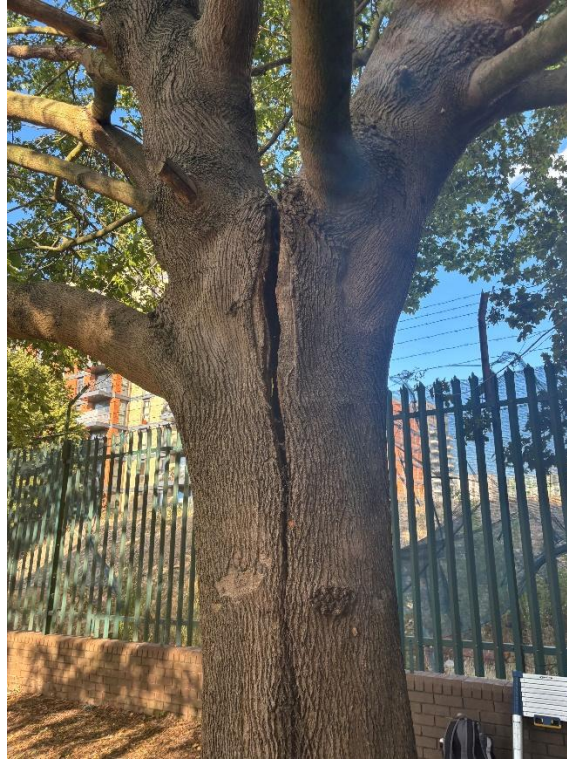
¹⁶ Collins, J. (ed) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. The Bat Conservation Trust, London.

SUMMARY AND CONCLUSION

- The site supports a single tree just outside the site boundary which was identified as PRF-M following the GLTA. The Proposed Development has some potential for adverse impacts on bat species, with further assessment required regarding the presence of roosting bats within T1;
- Further survey is recommended for this tree, comprising three PRF inspection surveys in line with best practice guidance, to confirm the presence or likely absence of roosting bats.
- Depending on the timing of construction activities commencing, the findings of the survey and assessment may require an update to ensure the findings remain valid and any changes to the conditions on the site are assessed.

APPENDIX A – GLTA Survey Results

Table 2 Ground Level Tree Assessment full results

Tree code	PRFs Recorded		Evidence of Bats	Overall Suitability as a Roosting Habitat	Photograph
	PRF	Description			
T1	Fissure on main stem	Fissure, leading to a large cavity in the main stem of the tree	No	PRF-M	

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APPENDIX C - Delivering the Principles of Biodiversity Net Gain

Principle	Application in Practice	How to Address through the Project
Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort compensate for losses that cannot be avoided and, where not possible, offset biodiversity losses by gains elsewhere.	An ecological appraisal has been undertaken early in the project to understand potential biodiversity constraints associated with the development site and review the development layout to consider opportunities to retain significant habitats.
Avoid losing biodiversity that cannot be offset elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve net gain.	By undertaking an ecological appraisal early in the project, the habitats present on-site have been identified with no irreplaceable habitats or features present on the site.
Be inclusive and equitable	Engage stakeholders ⁶⁰ early, and involve them in designing, implementing, monitoring and evaluating the approach to net gain.	Collaboration between various interested parties in the design, in particular the landscape architect and ecologist but potentially extending to additional consultants in relation to sustainable drainage and health, is important in ensuring opportunities for combined benefits can be realised through the proposals. The requirements of external stakeholders are well communicated through various strategies and policies, which have been referenced in the ecological assessment. Consultation may be undertaken where requirements are more bespoke or through the pre-application process.
Address risk	Mitigate difficulty, uncertainty and other risks to achieve net gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any residual risk, as well as compensate for the time between the losses occurring and the gains being fully realised.	The value presented for enhancements are based on Defra's Statutory Biodiversity Metric, which addresses risk through a series of multipliers. The difficulty of creation/enhancement multiplier addresses the uncertainty in the effectiveness of techniques to create/enhance habitats whilst the time to target condition addresses the time between creation/ enhancement and achievement of the target condition. In addition to this, appropriate inclusion has been made to reflect a reasonable development programme with a delay between site clearance and the commencement of landscaping.
Make a measurable net gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.	Assessment of the net gain through Defra's Statutory Biodiversity Metric has quantified the biodiversity value of the final development site. Enhancements proposed will consider local policies for nature conservation priority, where possible, such as those communicated in Biodiversity Action Plans or Nature Recovery Strategies.

⁶⁰ Stakeholders are defined in the guidance as 'individuals and organisations who are actively involved in the project, or whose interests may be positively or negatively affected as a result of project execution or successful project completion'.

Principle	Application in Practice	How to Address through the Project
Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using credible evidence and local knowledge to make clearly justified choices when: - Delivering compensation that is ecologically equivalent in type, amount and condition and that accounts for the location and timing of biodiversity losses; - Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation; - Achieving net gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels; - Enhancing existing or creating new habitat; - Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity.	The location of enhancement measures has been considered through the Statutory Metric, adding weight to on-site and local measures compared to off-site measures. As a result, it is advantageous for the project to maximise opportunities for biodiversity on-site where possible. Consideration has been given in the Ecological Appraisal regarding the context of the site and its potential to establish connections with semi-natural habitats in the wider area, particularly given its urban location.
Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations, i.e. do not deliver something that would occur anyway.	Habitat creation and enhancement proposals has been based on actions that are undertaken to deliver new habitats. The Proposed Development has sought to maximise the biodiversity value of the site. Providing additional species measures further demonstrates additionality.
Create a net gain legacy	Ensure net gain generates long-term benefits by: - Engaging stakeholders and jointly agreeing practical solutions that secure net gain in perpetuity; - Planning for adaptive management and securing dedicated funding for long-term management; - Designing net gain for biodiversity to be resilient to external factors, especially climate change; - Mitigating risks from other land uses; - Avoiding displacing harmful activities from one location to another; - Supporting local-level management of net gain activities.	Consideration has been given in the development of proposals to ensure solutions are practical for their location/use and resilient to external factors, such as climate change. This has been achieved by ensuring collaboration in the design team to balance competing requirements for space within the development, ensuring proposals for habitat creation are appropriate for their intended purpose/location and through consideration of the species proposed for planting to balance native species with those being resilient to warmer and more arid environments. Management will form a significant aspect of proposed landscaping, which comprises a significant part of the scheme design and operation. Management of the landscaping will be important in attracting and retaining tenants and as part of the publicly accessible terrace. A condition requiring a Landscape and Ecological Management Plan can be proposed to address adaptive management that secures long-term enhancement. The mitigation of risk from other land uses and displacement of harmful activities is not relevant to this development, with the site operation similar to that in the baseline.
Optimise sustainability	Prioritise BNG and, where possible, optimise the wider environmental benefits for a sustainable society and economy.	As above, collaboration in the design team has helped realise mutual benefits through habitat creation, for example as a result of access to nature for tenants, occupiers or the public, improved air quality, provision of shading or as a sustainable drainage feature.
Be transparent	Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.	The BNG assessment has been communicated in a clear manner, following the precautionary principle where appropriate and clearly demonstrating how the proposals will deliver on planning policy and legislative requirements to deliver a net gain for biodiversity.

APPENDIX D – Site Photos



Photo 1: Ruderal/Ephemeral habitat.



Photo 2: Stands of fleabane present in ruderal habitat.



Photo 3: Sparsely vegetated urban land.



Photo 4: Ruderal/ephemeral habitat.



Photo 5: View atop the central mound, facing east.



Photo 6: Sparsely vegetated urban land habitat.



Photo 7: Ruderal/ephemeral habitat in north-west of site.



Photo 8: Sparsely vegetated urban land habitat, with patches of grass.



Photo 9: Crack in tree outside of site.



Photo 8: Knot holes in tree outside of site

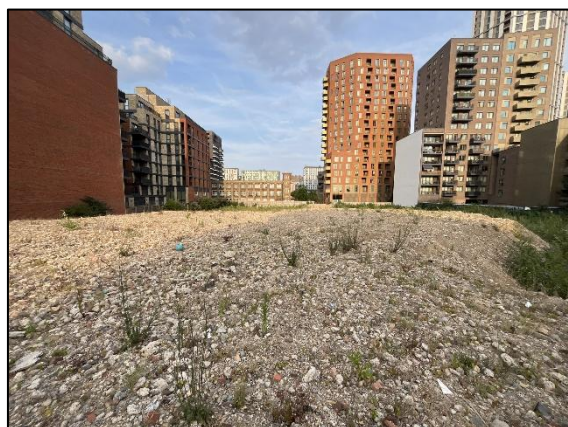


Photo 9: View atop of the central mound.

APPENDIX E – Condition Assessment Sheets

Condition Sheet: URBAN Habitat Type			
Habitat Types			
Sparsely vegetated land - Ruderal/Ephemeral Sparsely vegetated land - Tall forbs Urban - Allotments Urban - Biodiverse green roof Urban - Bioswale Urban - Cemeteries and churchyards Urban - Facade-bound green wall Urban - Ground based green wall Urban - Intensive green roof Urban - Open mosaic habitats on previously developed land Urban - Rain garden Urban - Sustainable drainage system (SuDS) Urban - Vacant or derelict land Urban - Bare ground			
Habitat Description			
Ruderal/Ephemeral			
See the Statutory Biodiversity Metric User Guide for green roofs and UK Habitat Classification (UKHab) for other habitats:			UKHab – UK Habitat Classification
On-site or off-site, site name and location	Ashley House	Survey date and Surveyor name	9th of July 2026
Limitations (if applicable)		Survey reference (if relating to a wider survey)	
Grid reference		Habitat parcel reference	
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
Core Criteria - must be assessed for all urban habitat types :			
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	Yes	
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Yes	
C	Invasive non-native plant species (listed on Schedule 9 of WCA ¹) and others which are to the detriment of native wildlife (using professional judgement) ² cover less than 5% of the total vegetated area ³ . Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	No	
Additional Criterion - must be assessed for Open mosaic habitat on previously developed land only:			
D	The parcel shows spatial variation and forms a mosaic of bare substrate PLUS: - At least four early successional communities (a) to (i); Communities: (a) annuals; (b) mosses/liverworts; (c) lichens; (d) ruderals; (e) inundation species; (f) open grassland; (g) flower-rich grassland; (h) heathland, (i) pools.		
Additional Criteria - must be assessed for Bioswale and SuDS habitat types only:			
E1	Plant species are mostly native. If non-native species are present, they should not be detrimental to the habitat or native wildlife ⁴ .		
E2	The vegetation is comprised of plant species suited to wetland or riparian situations.		
Additional Criterion - must be assessed for Intensive green roofs only:			

F	The roof has a minimum of 50% native and non-native wildflowers. 70% of the roof area is soil and vegetation (including water features).		
Additional Criterion - must be assessed for Biodiverse green roofs only:			
G	The roof has a varied depth of 80 – 150 mm; at least 50% is at 150 mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. Note – to achieve Good condition some additional habitat, such as sand piles, stones, logs etc. are present.		
Essential criteria relevant for habitat type achieved (Yes or No)			
Number of criteria passed			2
Condition Assessment Result		Condition Assessment Score	Score Achieved ×/✓
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):			
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C.		Good (3)	
• Passes 2 of 3 core criteria; OR • Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)	X
• Passes 0 or 1 of 3 core criteria.		Poor (1)	
Results for Green roofs and Open mosaic habitat on previously developed land (requiring assessment of 4 criteria only - core criteria plus additional criterion specified for habitat type):			
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes additional criterion relevant to specific habitat type (D, F or G).		Good (3)	
• Passes 2 or 3 of 4 criteria; OR • Passes 4 of 4 criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)	
• Passes 0 or 1 of 4 criteria.		Poor (1)	
Results for Bioswale or SuDS (requiring assessment of 5 criteria - core criteria plus additional criteria specified for habitat type):			
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes all additional criteria relevant to specific habitat type (Group E)		Good (3)	
• Passes 3 or 4 of 5 criteria; OR • Passes 5 of 5 criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)	
• Passes 2 or fewer of 5 criteria.		Poor (1)	
Suggested enhancement interventions to improve condition score			
Footnotes			

Condition Sheet: URBAN Habitat Type			
Habitat Types			
Sparsely vegetated land - Ruderal/Ephemeral Sparsely vegetated land - Tall forbs Urban - Allotments Urban - Biodiverse green roof Urban - Bioswale Urban - Cemeteries and churchyards Urban - Facade-bound green wall Urban - Ground based green wall Urban - Intensive green roof Urban - Open mosaic habitats on previously developed land Urban - Rain garden Urban - Sustainable drainage system (SuDS) Urban - Vacant or derelict land Urban - Bare ground			
Habitat Description			
Sparsely vegetated urban land			
See the Statutory Biodiversity Metric User Guide for green roofs and UK Habitat Classification (UKHab) for other habitats:			UKHab – UK Habitat Classification
On-site or off-site, site name and location	Ashley House	Survey date and Surveyor name	9th of July 2026
Limitations (if applicable)		Survey reference (if relating to a wider survey)	
Grid reference		Habitat parcel reference	
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
Core Criteria - must be assessed for all urban habitat types :			
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	No	
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Yes	
C	Invasive non-native plant species (listed on Schedule 9 of WCA ¹) and others which are to the detriment of native wildlife (using professional judgement) ² cover less than 5% of the total vegetated area ³ . Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	No	
Additional Criterion - must be assessed for Open mosaic habitat on previously developed land only:			
D	The parcel shows spatial variation and forms a mosaic of bare substrate PLUS: - At least four early successional communities (a) to (i); Communities: (a) annuals; (b) mosses/liverworts; (c) lichens; (d) ruderals; (e) inundation species; (f) open grassland; (g) flower-rich grassland; (h) heathland, (i) pools.		
Additional Criteria - must be assessed for Bioswale and SuDS habitat types only:			
E1	Plant species are mostly native. If non-native species are present, they should not be detrimental to the habitat or native wildlife ⁴ .		
E2	The vegetation is comprised of plant species suited to wetland or riparian situations.		
Additional Criterion - must be assessed for Intensive green roofs only:			

F	The roof has a minimum of 50% native and non-native wildflowers. 70% of the roof area is soil and vegetation (including water features).		
Additional Criterion - must be assessed for Biodiverse green roofs only:			
G	The roof has a varied depth of 80 – 150 mm; at least 50% is at 150 mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. Note – to achieve Good condition some additional habitat, such as sand piles, stones, logs etc. are present.		
Essential criteria relevant for habitat type achieved (Yes or No)			
Number of criteria passed			1
Condition Assessment Result		Condition Assessment Score	Score Achieved ×/✓
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):			
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C.		Good (3)	
• Passes 2 of 3 core criteria; OR • Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)	
• Passes 0 or 1 of 3 core criteria.		Poor (1)	X
Results for Green roofs and Open mosaic habitat on previously developed land (requiring assessment of 4 criteria only - core criteria plus additional criterion specified for habitat type):			
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes additional criterion relevant to specific habitat type (D, F or G).		Good (3)	
• Passes 2 or 3 of 4 criteria; OR • Passes 4 of 4 criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)	
• Passes 0 or 1 of 4 criteria.		Poor (1)	
Results for Bioswale or SuDS (requiring assessment of 5 criteria - core criteria plus additional criteria specified for habitat type):			
• Passes all 3 core criteria; AND • Meets the requirements for Good condition within criterion C; AND • Passes all additional criteria relevant to specific habitat type (Group E)		Good (3)	
• Passes 3 or 4 of 5 criteria; OR • Passes 5 of 5 criteria but does not meet the requirements for Good condition within criterion C.		Moderate (2)	
• Passes 2 or fewer of 5 criteria.		Poor (1)	
Suggested enhancement interventions to improve condition score			
Footnotes			

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