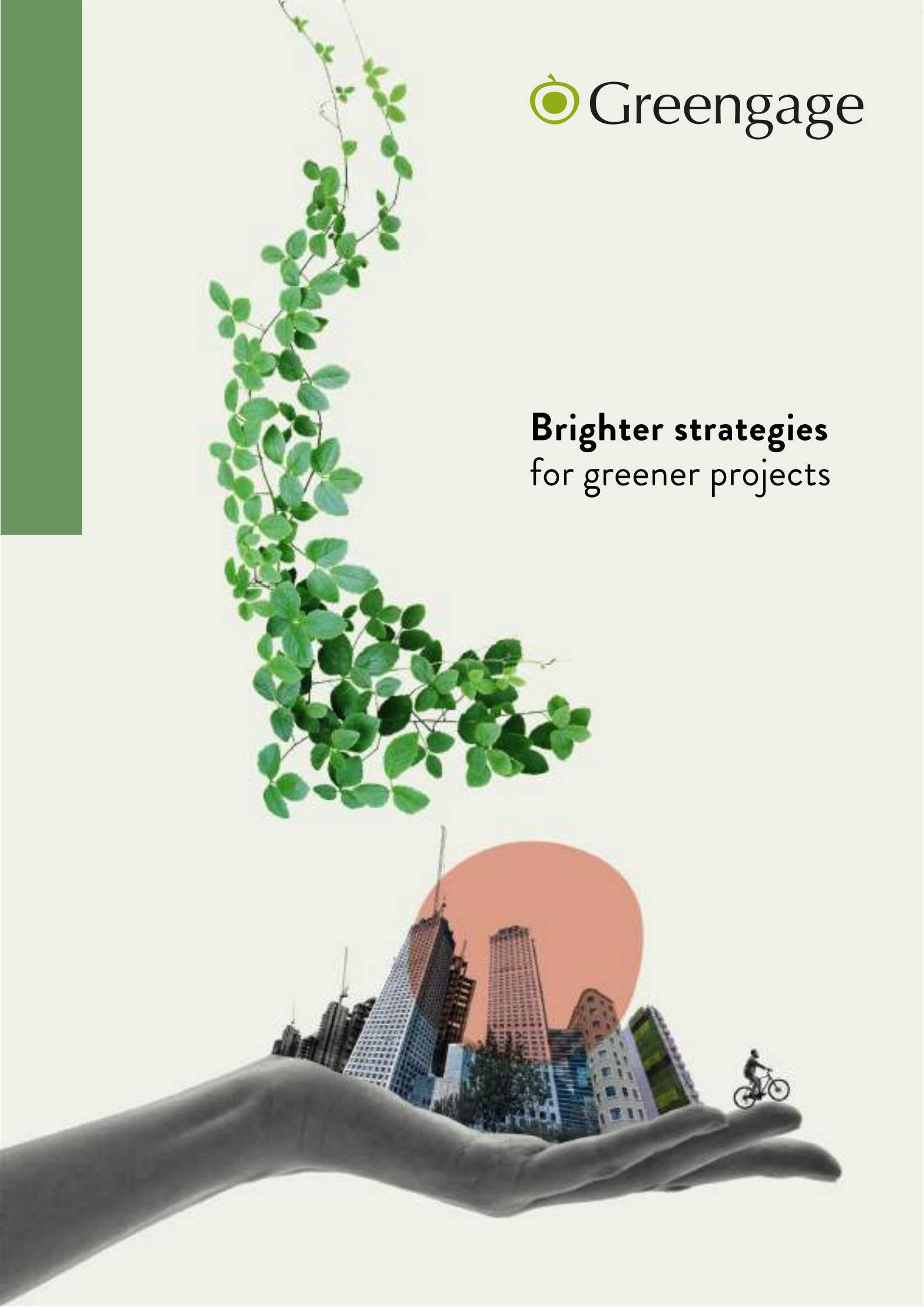




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Project: Down Lane Park
Report: Preliminary Ecological Appraisal

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CONTENTS

1.0	EXECUTIVE SUMMARY	1
2.0	INTRODUCTION	3
2.1	SITE DESCRIPTION	3
3.0	METHODOLOGY	4
3.1	DESK TOP REVIEW	4
3.2	ON SITE SURVEYS	4
3.3	SURVEYORS	7
3.4	CONSTRAINTS	8
4.0	RESULTS	9
4.1	DESK TOP REVIEW	9
5.0	EVALUATION AND DISCUSSION	22
5.1	BASELINE SUMMARY	22
5.2	DISCUSSION AND RECOMMENDATIONS	23
5.3	BIODIVERSITY ENHANCEMENTS	26
6.0	SUMMARY & CONCLUSION	30
APPENDIX A SITE PLAN AND HABITAT MAP		
APPENDIX B BAT PRF MAP		
APPENDIX C RELEVANT LEGISLATION AND POLICY		
REFERENCES		

Tables

Table 4.1	Statutory and Non-Statutory Designated Sites within Search Radius	9
Table 5.1	Baseline Summary	22

Figures

Figure 4.1	Western facade of Building one	13
Figure 4.2	Eastern facade of Building two	13
Figure 4.3	South and eastern facade of Building three	14
Figure 4.4	Paved hardstanding at the south of the site	14
Figure 4.5	Modified grassland at the north of the site	15
Figure 4.6	Other neutral grass at the south of the site	16
Figure 4.7	Introduced shrubs at the southern border of the site	16

Figure 4.8 Horticulture area	17
Figure 4.9 Line of trees at the centre of the site.	18
Figure 4.10 Deadwood on modified grassland	19
Figure 4.11 Examples of potential roosting features within trees.	20
Figure 5.1 Example of wildlife pond creation	27
Figure 5.2 Example of native species rich hedgerow with understorey vegetation	28
Figure A.1 Site plan and habitat map	

1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd was commissioned to undertake a Preliminary Ecological Appraisal by Haringey Council of a site known as Down Lane Park in the London Borough of Haringey.

This document is a report of this survey and has been produced to support a planning submission for the site which seeks to involve a holistic review of the park infrastructure using a wide lens. The function and amenity offered by the park will be improved both in terms of contemporary play approaches and sports/leisure along with the enhanced management and maintenance. The new masterplan will seek to integrate the northern Site of Importance for Nature Conservation (SINC) park space with the southern which is currently of a distinct character – making the two spaces read quite separately. A new approach to sustainable drainage will be integrated with strategies for play, wayfinding, planting and general design approaches to achieve biodiversity gain. The range of opportunities for the new park masterplan are diverse and community engagement will sit at the heart of the process with an existing Community Design Group leading the design evolution. A community ‘hub’ facility will be located within the masterplan with options for this being developed with the CDG and LBH stakeholders. The resulting proposal will ensure a vibrant, safe and high quality amenity for Tottenham Hale which better supports the needs of this changing community. The park will realise vital opportunities to challenge issues such as climate change, tree canopy resilience, child mobility, healthy routes to school and greenspace to support strong physical and mental health.

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

A previous preliminary bat roost assessment was undertaken by University of East London in May 2021 (report ref: May 2021LWT_UEL_Down Lane Recreation Ground_PRA_Report_V1.pdf). Furthermore an Ecological Narrative and Design Principles document was produced by London Wildlife Trust following surveys in 2011 and 2020 (report ref:Down Lane Park - Strategic Ecological Advice v1 updated_Optimized.pdf)

The survey area extends to 6.95ha and comprised modified grassland, other neutral grassland, line of trees, scattered urban trees, developed land sealed surface, buildings, horticulture and introduced shrubs.

The survey, undertaken by Greengage on the 2nd August 2022, alongside data received from a desktop study, confirmed the site has potential to support the following protected/notable species:

- Low-Moderate potential to support roosting bats;
- Moderate potential to support foraging and commuting bats;
- High potential to support nesting birds;
- Moderate potential to support invertebrates;
- Moderate potential to support hedgehogs.

Recommendations have therefore been provided for additional phase two surveys to be completed for bats. Preliminary mitigation, compensation and enhancement concepts relating to bats are briefly outlined within this report and are to be confirmed following the recommended phase two survey work.

No further surveys for nesting birds are required, however, site clearance should be undertaken outside of the nesting bird season (March – August inclusive), or after a nesting bird check, by a suitably qualified ecologist (SQE), confirms the likely absence of nesting birds. Loss of any habitat should also be compensated for through improved landscaping.

The northern part of the site includes a SINC of Local Importance, Down Lane Recreation Ground. Furthermore the site is ~500m from statutory sites Lea Valley RAMSAR and SPA and Walthamstow Reservoirs SPA and SSSI. Impacts upon these sites may occur as a consequence of construction works at the site. Production and compliance with an appropriate Construction Environmental Management Plan (CEMP) is accordingly recommended to address these potential impacts; this document could be secured through a planning condition.

Ecological enhancement recommendations are also made within this report, with the intention of delivering measurable net gains for biodiversity. These include the provision of:

- Vertical greening (trellises with climbing plants);
- Wildlife friendly landscaping;
- Woodland planting including native trees and understorey vegetation;
- Wildflower meadow creation;
- Wildlife pond;
- Hedgerow;
- A biodiverse living roof on all new buildings;
- Invertebrate habitat features including bee bricks and log piles;
- Bird and bat boxes integrated within the built form of new buildings;
- Wildlife bridge; and
- Permeable paving.

The development presents the opportunity to benefit a range of species through incorporation of ecological features and provision of new habitats that would encourage species to the site. Key actions should be included within EMP documents for the site which could be secured through planning condition.

2.0 INTRODUCTION

Greengage was commissioned to undertake a Preliminary Ecological Appraisal by Haringey Council of a site known as Down Lane Park in the London Borough of Haringey.

This document is a report of this survey and has been produced to support a planning submission for the site which seeks to involve a holistic review of the park infrastructure using a wide lens. The function and amenity offered by the park will be improved both in terms of contemporary play approaches and sports/leisure along with the enhanced management and maintenance. The new masterplan will seek to integrate the northern (SINC) park space with the southern which is currently of a distinct character – making the two spaces read quite separately. A new approach to sustainable drainage will be integrated with strategies for play, wayfinding, planting and general design approaches to achieve biodiversity gain. The range of opportunities for the new park masterplan are diverse and community engagement will sit at the heart of the process with an existing Community Design Group leading the design evolution. A community ‘hub’ facility will be located within the masterplan with options for this being developed with the CDG and LBH stakeholders. The resulting proposal will ensure a vibrant, safe and high quality amenity for Tottenham Hale which better supports the needs of this changing community. The park will realise vital opportunities to challenge issues such as climate change, tree canopy resilience, child mobility, healthy routes to school and greenspace to support strong physical and mental health.

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

2.1 SITE DESCRIPTION

The survey area extends to approximately 6.95 hectares and is centred on National Grid Reference TQ 34341 89920, OS Co-ordinates 534341 , 189920.

The site itself comprised modified grassland, other neutral grassland, line of trees, urban trees, developed land sealed surface, buildings and horticulture and introduced shrub.

The site is located within the densely developed area of South Tottenham with Tottenham Hale station ~120m south. The wider area is dominated by residential development to the north and west, with Lea Valley and Walthamstow Reservoirs to the east.

Greenspace in the wider area includes East Hale Allotments ~320m east, Pymmes Brook ~425m east, Hartington Park ~440m north west and River Lea and Walthamstow reservoirs ~500m east

3.0 METHODOLOGY

The PEA (which included an Extended Ecological Phase 1 Survey) was undertaken in accordance with guidance in the UK Habitat Classification System (UKHab)¹ and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal², in accordance with BS42020:2013: Biodiversity³. The overall assessment consisted of:

- Site specific biological information gained from statutory and non-statutory consultation; and
- A site walkover, protected species scoping assessment and phase 1 habitat survey.

The site-specific consultation provided the ecological context for the site survey carried out on the 2nd August 2022.

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

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

3.1 DESK TOP REVIEW

A review of readily available ecological information and other relevant environmental databases (included Defra's Multi-Agency Geographic Information for the Countryside (MAGIC) website⁴) was undertaken for the site and its vicinity. In addition a biological records search from Greenspace Information for Greater London (GiGL) were reviewed to identify the location and citations of local non-statutory designated sites and presence of records for notable and protected species. This provided the overall ecological context for the site, to better inform the Phase 1 Survey.

3.2 ON SITE SURVEYS

Flora

The extent and distribution of different habitats on site were identified and mapped according to the standard Phase 1 Survey methodologies, supplemented with target notes describing the dominant botanical species and any features of interest. Any present protected plant species and invasive/non-natives were also noted. A habitat map has been produced to illustrate the results, as shown at Figure A.1

Fauna

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

The likelihood of occurrence is ranked as follows:

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

The species surveyed for included:

Badger (*Meles meles*)

The potential for badger to inhabit or forage within the study area was assessed. Evidence of badger activity includes the identification of setts (a system of underground tunnels and nesting chambers), grubbed up grassland (caused by the animals digging for earthworms, slugs, beetles etc.), badger hairs, paths, latrines and paw prints.

Bat Species (*Chiroptera*)

The site visit was undertaken in daylight and the evaluation of bat potential comprised an assessment of natural features on site that aimed to identify characteristics suitable for bat roosts, foraging and commuting. In accordance with Bat Conservation Trust's Good Practice Guidelines⁵ and methods given in English Nature's (now Natural England) Bat Mitigation Guidelines⁶ consideration was given to:

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

Definite signs of bat activity were taken to be:

- The bats themselves;

- Droppings;
- Grease marks;
- Scratch marks; and
- Urine spatter.

Signs of possible bat presence were taken to be:

- Stains; and
- Moth and butterfly wings.

Features with potential as roost sites include mature trees with holes, crevices or splits (the most utilised trees being oak, ash, beech, willow and Scots pine), caves, bridges, tunnels and buildings with cracks or gaps serving as possible access points to voids or crevices.

Additionally, linear natural features such as tree lines, hedgerows and river corridors are often considered valuable for commuting and semi-natural habitats such as woodland, meadows and waterbodies can provide important foraging resources. Consideration was given to the presence of these features both immediately within and adjacent to the assessment area.

Great Crested Newt (*Triturus cristatus*)

An assessment was carried out to identify any potential habitats that may support great crested newt (GCN) and other native amphibians. The aquatic and terrestrial habitats required generally include small, still ponds or water bodies suitable for breeding; and woodland or grassland areas where there is optimal invertebrate prey potential.

Reptiles

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

Dormouse (*Muscardinus avellanarius*)

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

Water Vole (*Arvicola terrestris*)

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

Otter (*Lutra lutra*)

Where desktop review or consultation indicates the presence of otter in a river catchment, the presence of water bodies with good cover and potential holt (den) sites would be noted. Spraint, footprints or food remains can also be noted.

Birds

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

Invertebrates

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

Biodiversity Action Plan priority species/ Species of Principal Importance

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

3.3 SURVEYORS

Morgan Taylor has a bachelors and masters degree in Marine Biology (MSci Hons), a Natural England CL17 Bat Survey Level 2 Class Licence (2015-7369-CLS-CLS) and CL10 Dormouse Survey Licence (2017-30817-CLS-CLS). Morgan is a Chartered Environmentalist, Full member of CIEEM and has over 11 years' experience in ecological surveying, having undertaken assessments of numerous development sites of this type. He leads the Ecology team at Greengage.

Sara Morris, who prepared this report, has an undergraduate degree in Environmental Biology (BSc Hons) and over four years of experience in ecological surveying and consultancy.

This report was written by Sara Morris and reviewed and verified by Morgan Taylor who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

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

- Avoids invalid, biased and exaggerated statements.

3.4 CONSTRAINTS

Although the site visit was undertaken during an optimal time of year, the area had experienced a lack of rainfall and the vegetation and grass on site was parched. This limited the number of floral species that could be identified; however it was still possible to assess the habitats present across the site.

Therefore, no significant constraints that stand to impact conclusions drawn in this report presented themselves.

4.0 RESULTS

4.1 DESK TOP REVIEW

Designations

Consultations with the local biological record centres (GiGL) and the MAGIC dataset have confirmed that there are no statutory designations of national or international importance within the boundary of the site.

There is however one Local Nature Reserve (LNR), a site that is a RAMSAR and Special Protection Area (SPA), a site that is a Site of Special Scientific Interest (SSSI) and SPA, and a Special Area of Conservation (SAC) and SSSI within a 4.5 km radius.

The site itself is a SINC of Local Importance known as Down Lane Recreation Ground.

Records from GiGL also identified 17 non-statutory Sites of Importance for Nature Conservation (SINC's) within 2km of the site boundary. SINC's are recognised by LPAs as important wildlife sites.

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

Table 4.1 Statutory and Non-Statutory Designated Sites within Search Radius

Site Name	Approximate Location	Description
Statutory Designations		
Walthamstow Reservoirs SPA and SSSI	500m east	The Walthamstow 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 birds.
Lea Valley Ramsar and SPA	500m east	A series of embanked water supply reservoirs, sewage treatment lagoons, and former gravel pits extending along about 24km of the valley from near Ware southward to Finsbury Park in London. These water bodies support internationally important numbers of wintering Gadwall and Shoveler (Criterion 6) and nationally important numbers of several other bird species.
Walthamstow Marshes SSSI	1.9km south east	Walthamstow Marshes are one of the last remaining examples of semi-natural wetland in Greater London. They contain a variety of plant communities typical of a former flood plain location, such as a range of neutral grassland types, sedge marsh, reed swamp, sallow scrub and areas of tall herb vegetation. Associated with this diversity of habitat are

Site Name	Approximate Location	Description
		several species of plant and insect which are uncommon in the London area.
Springfield Park LNR	1.9km south	The site is a Regionally Important Geological Site (RIGS). Formed from the grounds of three private houses, of which only Springfield House (The White House) remains. The Park is around 40 acres in size, with formalised gardens and conservation areas and has extensive views across Walthamstow Marshes.
Epping Forest SAC and SSSI	4.5km east	Epping Forest is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains and scattered wetland. The seminatural woodland is particularly extensive, forming one of the largest coherent blocks in the country.
Non-Statutory		
Down Lane Recreation Gound SINC of Local Importance	Site itself	A park with substantial areas of native woodland and scrub planting and meadows. Native tree species present include birch, hazel and wild cherry.
East Hale Allotments SINC of Local Importance	320m east	The well-maintained Easthale Allotments have thick hedges along two sides. These are composed of hawthorn, privet and blackthorn with bramble and rough grassland at the base. Harsh downy-rose which is rare in London, occurs in the eastern boundary hedge.
Lea Valley SINC of Metropolitan Importance	500m east	This sprawling series of open spaces, in the valley of the River Lea, includes lakes, reservoirs, marshes and wet grassland. The wonderfully diverse range of wetland habitats has made this area a haven for many rare plants and a tremendous range of birds
Bruce Grove Wood	650m west	Bruce Grove Wood is a remarkable site tucked away at the back of Bruce Grove School, but not easily seen from the surrounding roads. There are a range of habitats on the site, including overgrown allotments, mown grass, and secondary woodland of ash (<i>Fraxinus excelsior</i>) and sycamore (<i>Acer pseudoplatanus</i>). The

Site Name	Approximate Location	Description
Markfield Park Borough Grade II SINC	850m south	A small park next to the River Lea, with a range of habitats, where a nationally scarce plant, wall bedstraw, grows. This small park has a good diversity of self-established habitats at the northern end, where a mosaic of scrub, young woodland, tall herbs, rough grassland and ruderal vegetation can be found.

Biodiversity Action Plans

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

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

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

There were no UK BAP priority habitats present at site or in the immediate vicinity. The Magic database shows the site to contain priority habitat deciduous woodland, however this was not present at the time of the survey. However, scattered and lines of trees were present within areas of modified grassland.

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

Haringey BAP

The Haringey BAP lists six habitats which are covered by Habitat Action Plans (HAPs) and one species with a Species Action Plan (SAP). Of these, the following are of relevance to this site:

- Parks and Green Spaces Habitat Action Plan;
- Standing water HAP;
- Built structures HAP; and
- Bat SAP.

Species Record

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

- Amphibians including common toad (*Bufo bufo*) and common frog (*Rana temporaria*);
- Reptiles including grass snake (*Natrix helvetica*);
- Birds including swift (*Apus apus*), house sparrow (*Passer domesticus*) lesser spotted woodpecker (*Dryobates minor*) tawny owl (*Strix aluco*), short-eared owl (*Asio flammeus*) and black redstart (*Phoenicurus ochruros*);
- Mammals including European water vole (*Arvicola amphibius*), West European hedgehog (*Erinaceus europaeus*) and Eurasian otter (*Lutra lutra*);
- Bats including serotine (*Eptesicus serotinus*), Daubenton's (*Myotis daubentonii*) whiskered bat (*Myotis mystacinus*), Leisler's (*Nyctalus leisleri*) noctule (*Nyctalus noctula*) nathusius pipistrelle (*Pipistrellus nathusii*) common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) brown long-eared (*Plecotus pygmaeus*); and
- Invertebrates including stag beetle (*Lucanus cervus*) small heath (*Coenonympha pamphilus*), small skipper (*Thymelicus sylvestris*) Essex skipper (*Thymelicus lineola*).

The species listed above are primarily those known to be in the area that may be impacted by any proposals at the site, or that stand to benefit as a consequence of potential ecological enhancements at the site and inform site-specific mitigation and enhancement recommendations described in the following chapter.

Detailed Description of Site: Habitats

The habitats presented across the assessment site consist of the following UKHab categories, as mapped at Figure A.1:

Buildings

There are three main buildings at the south of the site.

Building One

Building one was single storey, of brick construction with a pitched metal corrugated roof. It appeared to be in good condition with no obvious signs of wear and tear.

Figure 4.1 Western facade of Building one



Building Two

Building two was single storey, brick built with a flat roof. This appeared to be in good condition with no obvious signs of wear.

Figure 4.2 Eastern facade of Building two



Building Three

Building three at the south of the site was two storeys, brick built with a tiled pitched roof. This building showed signs of deterioration and several tiles were missing on the roof.

Figure 4.3 South and eastern facade of Building three



Urban developed land sealed surface

There are areas of urban developed land, sealed surface in the form of concrete and paved walkways across the site, with a concentration at the south. These areas appeared to be in good condition with few early colonising species present. These included hollyhock (*Alcea* sp.) and dandelion (*Taraxacum* sp.).

Figure 4.4 Paved hardstanding at the south of the site



Modified grassland

A large proportion of the northern half of the site is dominated by modified grassland. At the time of the survey the grass was parched and had turned brown. Species present included perennial rye grass (*Lolium perenne*), common mallow (*Melva sp.*), spear thistle (*Cirsium vulgare*), clover (*Trifolium sp.*), white comfrey (*Symphytum orientale*), yellow milfoil (*Achillea sp.*), hawksbeard (*Crepis sp.*), pineappleweed (*Matricaria discoidea*), creeping cinquefoil (*Potentilla reptans*). The grass appeared to be regularly mown with a short sward height. At the centre of the site a temporary circus was situated on the modified grassland.

Figure 4.5 Modified grassland at the north of the site



Other neutral grassland

Some small patches of grassland on mounds at the south and north of the site appeared to be less frequently managed with a tall and varied sward height. This was also parched. Species present included hawksbeard, common burdock (*Arctium minus*), yarrow (*Achillea sp.*), black horehound (*Ballota nigra*), dock (*Rumex sp.*) silver plantain (*Plantago sp.*) and chick weed (*Stellaria sp.*).

Figure 4.6 Other neutral grass at the south of the site



Introduced shrubs

There are areas of planted shrubberies at the south of the site. Species present include French rose (*Rosa gallica*), Mexican orange (*Choisya sp.*), red osier dogwood (*Cornus sericea*), holly (*Ilex sp.*), elderberry (*Sambucus sp.*) and common burdock (*Arctium minus*).

Figure 4.7 Introduced shrubs at the southern border of the site



Horticulture

An area at the south of building one had been utilised for horticulture with plants grown in segregated beds. Species present include artichoke (*Cynara sp.*), sunflower (*Helianthus sp.*), rosemary (*Salvia rosmarinus*), mint (*Mentha sp.*) and lavender (*Lavandula sp.*).

Figure 4.8 Horticulture area



Scattered trees

There are scattered trees across the park ranging from young to mature. Species included lime (*Tilia sp.*), Japanese cherry (*Prunus serrulata*), wild cherry (*Prunus avium*), hornbeam (*Carpinus betulus*), oak (*Quercus sp.*), golden alder (*Alnus incana*), ash (*Fraxinus sp.*), london plane (*Platanus x acerifolia*), horse chestnut (*Aesculus hippocastanum*), maple (*Acer sp.*), plum (*Prunus domestica*), sycamore (*Acer pseudoplatanus*), box elder (*Acer negundo*), common lime (*Tilia x europaea*) and sallow willow (*Salix caprea*).

Although the Magic database shows the presence of priority habitat deciduous woodland within the boundary of the site, this was not found to be present at the time of the survey, and was instead found to be scattered trees with modified grassland understorey.



Line of trees

There are lines of mature and semi mature trees at the western boundary of the site as well as at the centre and towards the south. Species present included hornbeam and lime.

Figure 4.9 Line of trees at the centre of the site.



Target note

The following target note is in relation to the plan at Appendix A. This note describes notable habitats at the site or within the vicinity of the site that are otherwise not picked up by the habitat key or site description.

Target note 1

This note describes an area of deadwood at the north of the site which included what appeared to be recently fallen branches as well as logs that appeared to be in later stage of decay.

Figure 4.10 Deadwood on modified grassland



Detailed description of Site: Species

Bats

Foraging

There are multiple records of bats recorded within 2km of the site. The vegetation on site including grass, shrubs, and trees all provide habitat for invertebrates and in turn a food source for bats. Furthermore the lines of trees onsite could provide value as a commuting route.

However the site is within an urbanised area and is likely subject to high levels of light pollution which acts as a deterrence to bats.

Therefore, the site is considered to have **moderate potential** to support foraging and commuting bats.

Roosting

All buildings and trees were assessed for their potential to support roosting bats.

Building three

Building three had potential roosting features including missing and slipped tiles on the roof. These features may provide a large internal space which could accommodate a large number of roosting bats. However due to its urban location it is unlikely to support a roost of rarer conservation status. Therefore building three was assigned a potential of **moderate**.



Trees

In line with the previous bat report (ref: May 2021LWT_UEL_Down Lane Recreation Ground_PRA_Report_V1.pdf) there were 18 trees with potential roosting features across the site. Features included small cavities in damaged limbs, knot holes and minor trunk wounds that appeared of limited extent. Most of the features were within the line of lime trees at the western boundary as mapped at appendix B.

Figure 4.11 Examples of potential roosting features within trees.



Reptiles

There are records of grass snake within 650m of the site however the site has limited habitats of value for reptiles, consisting largely of regularly mown grass which is kept to a short sward height. The neutral grassland provides some value but these areas are small and disconnected.

Given the very small amount of suitable habitat the site is thought to have **negligible potential** for reptiles.

Birds

There are records for numerous birds categorised as Priority Species/Species of Principal Importance in the surrounding 2km area, including UK/London BAP species, house sparrow. The development site is likely to support a range of common and widespread bird species with habitats of value including trees and shrubs. The site is therefore considered to have **high potential** to support breeding birds.

Invertebrates

The site is likely to support a range of common invertebrate species with habitats of value including trees, shrubs grassland and dead and decaying wood (Target note 1) There are records of several invertebrate Priority Species/Species of Principal Importance within 2km of the site including stag beetle. However, the areas of lying deadwood were small with only a small number of logs present. Therefore, the potential for the development site to support notable invertebrates is **moderate**.

Other BAP Species

There are 42 records of hedgehogs within the surrounding 2km area. The grassland, tree lines and shrubs onsite provide foraging habitat and shelter for hedgehogs. Therefore, the site is considered to have **moderate potential** to support hedgehogs.

Other Notable and/or protected species

A number of notable and/or protected species can be considered likely absent from the site due to the lack of suitable habitat. This includes badgers, reptiles, great crested newts, otter, water vole and dormouse.

5.0 EVALUATION AND DISCUSSION

5.1 BASELINE SUMMARY

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

Table 5.1 Baseline Summary

Receptor	Presence/Potential Presence	Comments
Designated Sites: Statutory	Present 500m from site	The nearest statutory sites, Lea Valley RAMSAR and SPA and the Walthamstow Reservoirs SPA and SSSI, are separated from the site by roads. Standard construction control measures should be sufficient to fully mitigate potential impacts and should be detailed within a Construction Environmental Management Plan (CEMP) for the site, which may be secured through planning condition in accordance with BS 42020: 2013 Biodiversity. Operational impacts are unlikely given the nature of proposals; improving usability of the site could in fact stand to benefit nearby accessible natura 2000 sites through creating a more desirable alternative location for recreation.
Designated Sites: Non-Statutory	Site itself	As the northern section of the site includes Down Lane Recreation Ground, a SINC of local Importance, construction activities on site have the potential to impact the SINC, through dust deposition and noise/light pollution. Standard construction control measures should be sufficient to fully mitigate potential impacts and should be detailed within a Construction Environmental Management Plan (CEMP) for the site, which may be secured through planning condition in

Receptor	Presence/Potential Presence	Comments
		accordance with BS 42020: 2013 Biodiversity.
Foraging bats	Moderate	Bat activity surveys are recommended to confirm the levels of bat activity, species present and ways in which the site is used, both spatially and temporally, in order to quantify impacts and identify an approach to mitigation.
Roosting bats	Low-Moderate	Further survey of potential roosting features on building three are recommended. No further survey is required for the trees with low potential however these should be soft felled should the trees with potential be proposed for removal.
Birds	High	Further survey in relation to nesting birds is not considered necessary. However, mitigation measures to ensure that no individuals or active nests are harmed during the site clearance is included below. Compensatory nesting habitat should be provided for any lost.
Invertebrates	Moderate	No further surveys are recommended however proposals should seek to retain the valuable habitats such as the deadwood and enhance the grassland habitat. Further enhancement recommendations are set out within section 5 below to increase the value of site for invertebrates.
Hedgehog	Moderate	Measures to protect hedgehog are described in section 5.2 of this report.

5.2 DISCUSSION AND RECOMMENDATIONS

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

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

Designated sites

The construction phase of the development may stand to have an impact on the non statutory element of the site as well as the nearby statutory sites Lea Valley RAMSAR and SPA and the Walthamstow Reservoirs SPA and SSSI.

Measures to prevent impacts on these statutory and non statutory sites should be incorporated into the CEMP. The CEMP should include measures such as:

- Pollution prevention;
- Surface run-off control;
- Dust control;
- Construction lighting control (e.g. restricting works to daylight hours where possible, directional lighting controlled by timers / PIR switches if lighting is required); and
- Materials storage and waste management.

As the development proposals do not include residential units, there is considered to be no risk of increased recreational pressure on any designated sites during the operational phase of the development, and creation of an improved recreational location at site may in fact stand to reduce recreational burden on nearby sites.

Bats

Foraging and Commuting

An update of the activity surveys previously undertaken is recommended. Mitigation and compensation requirements in relation to foraging and commuting bats is to be fully determined following these surveys, however mitigation in the form of wildlife friendly lighting is expected to be necessary.

Given the site's suburban location it is highly likely that the site is already subject to some light disturbance. The lighting to be implemented on site must therefore be designed to prevent increasing light levels above the current baseline level.

A sensitive lighting scheme following BCT/ILP best practice should be designed that uses low UV component bulbs and low lighting column height with directional, downward facing and shielded lights which point away from the deciduous woodland.

These actions could be described within the CEMP and operational lighting strategy for the site, which could be secured through planning condition in accordance with BS 42020: 2013 Biodiversity.

Roosting

As proposals are likely to include the demolition of the building on site with roosting potential, further survey to establish the presence/likely absence of roosting bats on site is required. These further surveys should take the form of emergence/re-entry surveys, undertaken in accordance with BCT Good Practice Guidelines (2016), carried out between May - August.

As the building has moderate roosting potential two surveys are required, spaced a minimum of two weeks apart.

Mitigation and compensation requirements in relation to any roosting bat(s) is to be fully determined following these further surveys, although, if roosting bats(s) are identified an appropriate licence from Natural England will be required to proceed with works.

Although best set out within the licence on completion of the surveys (which will determine the level of mitigation required), should roosts be identified, mitigation as a minimum will likely include supervision of removal of sensitive areas and provision of temporary and permanent new roosting spaces.

As per BCT guidance, no further survey is required for the trees with low potential. However, should these trees be proposed for removal they should be soft felled between September and October. In accordance with BCT guidance the limbs should be carefully removed using rigging so the tree can be safely and slowly lowered to the ground. The cut and lowered sections should remain in place for at least 24 hours before being cleared to allow any bats to exit should they be present.

If it is not possible to remove the low potential trees between September and October a survey by a suitably qualified ecologist should be undertaken immediately prior to the felling of each low potential tree.

Birds

Impacts upon nesting birds can be fully avoided through seasonal clearance of vegetation outside of the active nesting period (March to August inclusive), unless a suitably qualified ecologist has confirmed absence of active nests.

Compensatory and additional nesting opportunities should be provided in the form of bird boxes within the fabric of the buildings on the new development and provision of wildlife friendly landscaping including shrubby and berry producing species providing a winter food resource and a place of shelter.

BAP Species

In order to minimise the potential for killing or injuring of hedgehogs (and other small to medium sized mammals) during site clearance, removal of dense shrubbery should be undertaken in two phases, by cutting to 30cm in the first instance, then to ground level after that. The vegetation should be checked for mammals between these two cuts. Any potential hibernacula/refugia features suitable for hedgehogs encountered should be dismantled by hand to ensure no hedgehogs are present. Should any hedgehogs be found, they should be moved to a suitable area of habitat that is not subject to clearance.

5.3 BIODIVERSITY ENHANCEMENTS

In accordance with the National Planning Policy Framework, local policy drivers and recent changes to the legislative context, (Appendix C), proposals should seek to provide measurable net gains in biodiversity. These should aspire to a minimum of 10% net gain in biodiversity, which should be evidenced through a Biodiversity Impact Assessment (BIA) using the Natural England Biodiversity 3.1 metric⁷ or similar.

To enable proposals to deliver the desired net gains, the following measures should be considered for incorporation into the landscaping plans:

Vertical greening

Vertical greening consisting of trellis with climbing plants utilising native species of value for pollinators should be incorporated onto buildings within the park and/or as part of free standing features/pergolas.

Wildlife friendly landscaping

Wildlife friendly shrub and herbaceous planting should be incorporated within the site. Species selection should favour those listed in the Royal Horticultural Society (RHS) Good for Pollinators Guide⁸, as well as include winter berry producing species which provide a source of food for birds over the winter months. Consideration of climate should be integral within planting selection, with drought tolerant species favoured. Opportunities for SuDS and rain gardens should also be explored.

Woodland planting

It is recommended that an area of the park is dedicated to woodland type planting with an understorey mix of herbaceous and shrub species provided. Recommended tree species should be native or selected for the ecosystem services they can provide, such as carbon sequestration, drought tolerance and pollution tolerance. Species such as silver birch, willow (*Salix sp.*) and sweet chestnut (*Castanea satvia*) are recommended.

Wildflower Meadow Creation

Areas of modified grassland should be enhanced to become wildflower meadows. Meadow creation would require ground preparation and reseeded with an appropriate wildflower species mix such as Emorsgate's EM3F-special general-purpose wildflower mix⁹. Annual meadows should be avoided with a preference for herbaceous perennials.

Wildlife pond

It is recommended that a wildlife pond with wetland and marginal planting is included within proposals.

The pond should be dug to provide a range of depths, with a shallow profile. Full specifications of wildlife pond creation, with a step-by-step guide, can be found on Wildfowl and Wetland Trust (WWT) website¹⁰.

Figure 5.1 Example of wildlife pond creation



Hedgerow

Native species diverse hedgerows which are underplanted with perennial herbaceous vegetation, e.g. pignut, should be incorporated across the site. Species such as hawthorn (*Crataegus sp.*), blackthorn (*Prunus spinosa*), hazel (*Corylus sp.*) and dogwood are recommended.

Figure 5.2 Example of native species rich hedgerow with understorey vegetation



Biodiverse roofs

Extensive living roofs should be included on all buildings within the park as well as on smaller structures such as bin stores and sheds. These should comprise a substrate based biodiverse system plug planted and seeded with suitable species and be enhanced with invertebrate features such as rope coils and sandy piles. Substrate depths should be a minimum of 150mm ranging up to 250mm.

Invertebrate features

It is recommended that bee posts and habitat panels are installed across the site within areas of planting. Loggeries should also be installed with log sizes ranging from ~10cm up to ~40cm diameter with approximately one third of the logs buried. Plants such as ferns, bulbs, and other woodland understorey plants should then be planted amongst the loggeries.

Bird boxes

It is recommended that a variety of bird boxes should be integrated within the building facades as well as mounted on mature trees within the park. House sparrow, owl, swift, house martin and woodpecker boxes should all be included as well as generalist bird boxes.

Bat boxes

It is recommended that a mix of bat boxes should be incorporated within the park to cater for bats at all times of year, including summer roosting, maternity roosting, and hibernation. Bat boxes should be incorporated within the façade of new buildings as well as hung on mature retained trees.

Hedgehog enhancements

Any fencing onsite should be hedgehog friendly and include a gap at the base to allow the movement of hedgehogs across the site. Hedgehog houses should be placed with existing and new shrubbery, hedgerow and tree planting.

Wildlife Bridge

Down Lane park is within close proximity to important areas for wildlife such as Lea Valley and Walthamstow reservoirs, however it is separated from these by roads and railway lines. A vegetated wildlife bridge at the north eastern side of the park could link up these important habitats and increase the connectivity for a range of UK and London BAP species such as bats, hedgehogs, invertebrates, amphibians, reptiles and small mammals.

Permeable paving

There are areas of paved hardstanding in the form of walkways around the park, which predominantly comprised concrete and paving stones. It is recommended that all paving within the park should be permeable. Options include paving stones with porous mortar or a porous surface.

6.0 SUMMARY & CONCLUSION

Greengage was commissioned by Haringey Council to undertake a PEA of a site known as Down Lane Park in the London Borough of Haringey in order to establish the ecological value of this site and its potential to support notable and/or legally protected species.

The PEA identified value for a number of notable and protected species including bats, birds invertebrates and hedgehogs.

As a building onsite contains potential roosting features and has been assessed as having moderate suitability to support roosting bats, bat emergence surveys have been recommended.

As the site has potential to support foraging and commuting bats, lighting should be designed in line with Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) guidelines. An update to previous activity surveys onsite is also recommended.

No further surveys for nesting birds are required, however, site clearance should be undertaken outside of the nesting bird season (March – August inclusive), or after a nesting bird check, by a suitably qualified ecologist (SQE), confirms the likely absence of nesting birds.

A precautionary phased clearance is recommended for hedgehog as detailed within section 5 of this report.

The northern part of the site includes a Site of Importance for Nature Conservation (SINC) of Local Importance. Furthermore the site is ~500m from statutory sites Lea Valley RAMSAR and SPA and Walthamstow Reservoirs SPA and SSSI. Impacts upon these sites may occur as a consequence of construction works. Production and compliance with an appropriate Construction Environmental Management Plan (CEMP) is accordingly recommended to address these potential impacts; this document could be secured through a planning condition.

Key mitigation, compensation and enhancement actions are described to enable legislative and policy compliance (see context at Appendix C), aiming to achieve net gains in biodiversity for the site.

Key actions should be included within EMP documents for the site which could be secured through planning condition.

APPENDIX A SITE PLAN AND HABITAT MAP

Figure A.1 Site plan and habitat map



Down Lane Park

- Approximate Site Boundary
 - Scattered Trees/ Groups of trees
 - Target Notes
 - Line of trees
- UKHAB**
- g3c - other neutral grassland
 - g4 - modified grassland
 - h3 - introduced shrubs
 - c1f - horticulture
 - u1b - developed land, sealed surface
 - u1b5 - buildings



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**Fig 1.0 Bat Potential
Roosting Feature Map**

Project Number 552104
August 2022
1 to 2000 at A3



0 0.05 0.1 km

APPENDIX B BAT PRF MAP



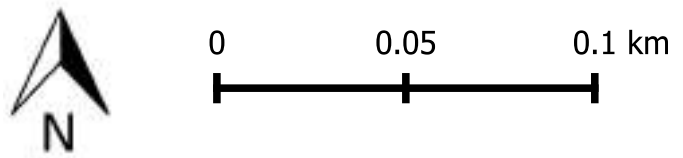
Down Lane Park

- Approximate Site Boundary
- Potential roosting feature
- Target Notes
- Line of trees



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Fig 1.0 Bat Potential Roosting Feature Map



APPENDIX C RELEVANT LEGISLATION AND POLICY

C.1 LEGISLATION

Current key legislation relating to ecology includes The Environment Act¹¹ Wildlife and Countryside Act 1981 (as amended)¹²; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')¹³, The Countryside and Rights of Way Act 2000 (CRoW Act)¹⁴, and The Natural Environment and Rural Communities Act, 2006¹⁵.

The Environment Act, 2021

The Environment Act, 2021 will mandate the requirement for new development in England to deliver a minimum 10% biodiversity net gain (BNG), as measured by the agreed metric (the current relevant version being the Natural England metric 3.0), secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of offsite biodiversity unit offsets, or the purchase of biodiversity credits.

The Act introduces the condition that no development may begin unless a biodiversity net gain plan has been submitted and approved by the local planning authority (LPA).

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

Under the Act, the enhancements must be maintained for at least 30 years.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)¹⁶, and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')¹⁷, and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')¹⁸ into UK law (in conjunction with the Wildlife and Countryside Act).

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

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

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and

(b) is not directly connected with or necessary to the management of that site;

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

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats¹⁹ (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

The Countryside and Rights of Way Act 2000

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

The Natural Environment and Rural Communities Act 2006

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

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (*Erinaceus europaeus*), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan²⁰ (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework²¹ (and Biodiversity 2020 strategy²² in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020²³ and EU Biodiversity Strategy (EUBS)²⁴, this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

Biodiversity Action Plans

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

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

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

Legislation Relating to Nesting Birds

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

Legislation Relating to Bats

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

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

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

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

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

Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;

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

This legislation applies to all bat life stages.

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

Legislation Relating to Reptiles

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

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

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

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

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

C.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2021²⁵ sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of

sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should ‘identify and pursue opportunities for securing measurable net gains for biodiversity’.

It goes on to state: ‘if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused’. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

Regional

The London Plan²⁶

Policy G1 Green infrastructure

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

Policy G5 Urban greening

1. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
2. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. (excluding B2 and B8 uses).
3. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

Policy G6 Biodiversity and access to nature

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

Policy G7 Trees and woodlands

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

London Environment Strategy 2018²⁷

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

Objective 5.1 Make more than half of London green by 2050

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

This policy states:

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

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

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

Objective 5.2 conserving and enhancement wildlife and natural habitats

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

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

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

Local

Haringey Local Plan

SP13: Open Space and Biodiversity

New development shall protect and improve Haringey’s parks and open spaces. All new development shall:

- Protect and enhance, and when and where possible, extend the existing boundaries of the borough’s Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development;
- Provide amenity space in accordance with the Council’s Open Space and Recreational Standards Supplementary Planning Document (SPD);
- Manage the impact of such new developments in areas adjacent to designated open space;
- Secure improvements, enhancement and management in both quality and access to existing green spaces;
- Seek on-site or financial contributions towards open space from new developments as set out in the Open Space and Recreational Standards SPD;
- Seek to secure opportunities for additional publicly accessible open space especially in those identified areas of Open Space deficiency e.g. in the east of the borough where the quality and amount of provision is poorer as set out in the Council’s Open Space and Recreational Standards SPD;
- Conserve the historic significance of the borough’s designated historic parks and gardens.

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