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Client: Haringey Borough Council
Project: Down Lane Park
Report: Biodiversity Net Gain Assessment

QUALITY ASSURANCE

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Prepared by:	Daniel Perlaki	Daniel Perlaki
Authorised by:	Georgia Alfreds	Georgia Alfreds
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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd was commissioned to undertake a Biodiversity Net Gain Assessment by Haringey Borough Council of a site known as Down Lane Park, within the London Borough of Haringey.

This report has been produced to support a planning submission for the masterplan for the park's renewal has evolved through a process of co-design which started in spring 2022 with a client team from Haringey Council combining both Parks and Regeneration. Plans to improve Down Lane Park have been created in partnership with the Community Design Group (CDG) who's agreed focus is to shape proposals, inform engagement and build support for designs by channelling feedback from residents and groups using the park.

Proposals include significant new tree planting to reinforce the existing canopy cover, combining with a new range of planting styles which offer climate change resilience, support sustainable urban drainage interventions and respond to available maintenance budgets. A strong new offer for play will be distributed across the park with two landmark provisions supported by 'play on the way' and playful landscape interventions. A new community hub building will sit at the heart of the new masterplan with new active sports, play and leisure uses clustered around it. The facility will include a café, celebration spaces, LBH Park's office space, publicly accessible toilets and a community garden directly adjacent. Inclusive design and accessibility are prioritised with enhanced entrances, footpath connections, lighting and natural surveillance to improve safety and offer a greater level of comfort for all users.

Further to confirmations received from the LBH Nature Conservation Officer, the UGF/BNG assessments have been undertaken on a park-wide basis. However, the adjacent masterplan confirms that planning permission is sought for the redline covering part of the south of the park and community hub building only.

Figure 1.1 Masterplan with planning boundary



This assessment aimed to quantify the predicted change in ecological value of the site in light of the proposed developments to assess compliance against local and national planning policy. The BNG requirement set out in the Environment Act 2021, to be mandated in November 2023, states that a target of 10% net gain in biodiversity should be reached and biodiversity value maximised on site.

The survey area extends to 6.94 hectares and comprises modified grassland with minor areas of other neutral grassland, line of trees around the perimeter of the site, scattered urban trees, developed land sealed surface, buildings, horticulture and introduced shrubs, together forming a public park.

Proposed habitat creation includes enhancement of the existing modified grassland to improve its condition, retention of other neutral grassland, planting high numbers of high-quality trees, provision of woodland understorey planting, improved provision of SUDs features, improvement and extension of introduced shrub areas and planting of mixed scrub habitat along the site perimeter.

This report demonstrates that the development proposals will result in a net gain of 12.52 biodiversity units and 2.25 hedgerow units should existing plans be adhered to, equivalent to a 18.74% increase in habitat units and 65.21% increase in hedgerow units. This represents compliance with local planning policy and exceeds the BNG Mandate which states a target of 10% net gain in biodiversity. All trading rules are satisfied.

Detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and management could be provided within an Ecological Management Plan for the site which

could be secured through planning condition. Should these recommendations be adhered to, the proposals stand to be compliant with legislation and current planning policy.

2.0 INTRODUCTION

Greengage was commissioned to undertake a Biodiversity Net Gain Assessment by Haringey Borough Council of a site known as Down Lane Park in the London Borough of Haringey.

This report has been produced to support a planning submission for the masterplan for the park's renewal has evolved through a process of co-design which started in spring 2022 with a client team from Haringey Council combining both Parks and Regeneration. Plans to improve Down Lane Park have been created in partnership with the Community Design Group (CDG) who's agreed focus is to shape proposals, inform engagement and build support for designs by channelling feedback from residents and groups using the park.

Proposals include significant new tree planting to reinforce the existing canopy cover, combining with a new range of planting styles which offer climate change resilience, support sustainable urban drainage interventions and respond to available maintenance budgets. A strong new offer for play will be distributed across the park with two landmark provisions supported by 'play on the way' and playful landscape interventions. A new community hub building will sit at the heart of the new masterplan with new active sports, play and leisure uses clustered around it. The facility will include a café, celebration spaces, LBH Park's office space, publicly accessible toilets and a community garden directly adjacent. Inclusive design and accessibility are prioritised with enhanced entrances, footpath connections, lighting and natural surveillance to improve safety and offer a greater level of comfort for all users.

The assessment aimed to quantify the predicted change in ecological value of the site in light of the proposed developments to assess compliance against local and national planning policy. The BNG requirement set out in the Environment Act 2021, to be mandated in November 2023, states that a target of 10% net gain in biodiversity should be reached and biodiversity value maximised on site.

Any further changes to the design will impact upon the BNG score and the metric will need to be updated to reflect such changes. This also carries forward throughout the entire lifetime of the project, including after planning permission has been granted, in and throughout the construction phase. Biodiversity net gain aims to give an accurate reflection of the changes happening on site.

2.1 SITE DESCRIPTION

The survey area extends to approximately 6.94 hectares and is centred on National Grid Reference TQ 34341 89920, OS Co-ordinates 534341, 189920.

Down Lane Park is a well-loved greenspace at the heart of a rapidly changing community in Tottenham Hale; it is a park of two distinct halves with differing but established landscape characters. The site is comprised modified grassland, other neutral grassland, line of trees, urban trees, developed land sealed surface, buildings and horticulture and introduced shrub, together forming a public park.

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

3.1 GOOD PRACTICE PRINCIPLES

To calculate the ecological value of the pre- and post-development site, the Natural England Metric 4.0 methodology was utilised, following good practice guidance from Natural England^{1,2}, and joint guidance from CIEEM, IEMA and CIRIA³. The good practice guidelines "provide a framework that helps improve the UK's biodiversity by contributing towards strategic priorities to conserve and enhance nature while progressing with sustainable development". This framework consists of 10 good practice principles which are outlined in Table 3.1.

Table 3.1 Good Practice Principles and Discussion

Good Practice Principle	Discussion
1. Apply the Mitigation Hierarchy	Ecological avoidance, protection, mitigation and compensation measures are discussed within the Preliminary Ecological Appraisal (PEA) prepared for the site (document ref: 552104sm16Aug22DV01_PEA). This includes production of a Construction Environment Management Plan (CEMP), a bat-sensitive lighting strategy, sensitive timing of any vegetation clearance required and precautionary method of works to minimise risk of injury to hedgehogs.
2. Avoid Losing Biodiversity that Cannot be Offset by Gains Elsewhere	No irreplaceable habitats are present on-site.
3. Be Inclusive and Equitable	Public consultation and engagement has been at the heart of the proposals and the project has utilised a unique Community Design Process to ensure the proposals deliver for the needs of all potential stakeholders and park users. 18 separate public consultation meetings and workshops have been held to ensure all stakeholders have input and ensure that the design process is as inclusive as possible.
4. Address Risks	Moderate distinctiveness habitats proposed have been selected in part due to their low delivery risk and low time to reach target condition to minimise delivery risk. Additionally, the Community Design Process has assisted in minimising risks as all relevant stakeholders have been consulted.
5. Make a Measurable Net Gain Contribution	The development is likely to achieve a measurable gain in biodiversity through the use of Metric 4.0. The metric calculations are subject to change regarding on design change.
6. Achieve the Best Outcomes for Biodiversity	Proposals seek to deliver ecological enhancements to improve the value of the site for notable ecological receptors in a local context.

Good Practice Principle	Discussion
7. Be Additional	In the absence of these proposals, the biodiversity enhancements described in this report wouldn't be delivered.
8. Create a Net Gain Legacy	The landscaping on site will be designed, where possible, to be climate resilient, including more drought tolerant species and deeper substrate depths for green roofs. The BNG on site will be managed for at least 30 years.
9. Optimise Sustainability	The proposals have been designed to provide ecological, social and cultural benefits, with sustainability goals delivered through provision of ecosystem services.
10. Be Transparent	Public consultation and engagement has been at the heart of the proposals and the project has utilised a unique Community Design Process to ensure the proposals deliver for the needs of all potential stakeholders and park users. 18 separate public consultation meetings and workshops have been held to ensure all stakeholders have input and ensure that the design process is as inclusive as possible.

3.2 BIODIVERSITY METRIC

This metric uses Biodiversity Units as a proxy for the ecological value of area or linear based habitats. The areas of each habitat parcel are measured, with each parcel assigned a 'Distinctiveness', 'Condition' and 'Strategic Significance' score. Distinctiveness is a default score for the habitat classification, representing its inherent ecological value, whereas condition refers to the state each parcel is in relative to predetermined set of criteria outlined in the supplementary Biodiversity Metric 4.0 guidance.

Strategic significance draws upon priorities and objectivise within local plans and strategies, and is measured by providing habitats with a score from low to high as follows:

- High - "area/action formally identified within a local plan, strategy or policy";
- Medium - "location ecologically desirable but area/action not identified in local plan, strategy or policy"; and
- Low - "area/action not identified in any local plan, strategy or policy; or no local strategy in place"⁴.

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

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

3.3 BASELINE CALCULATION

To calculate pre-development Biodiversity Units, data collected during a PEA undertaken by Greengage in August 2022 was assessed. Areas of each habitat type were taken from the baseline habitat map within QGIS (Appendix A).

Additionally, to calculate the Biodiversity Units associated with trees on site, data tables from the BS5837 Tree Survey Report undertaken by Landmark Trees were assessed (ref: dlp_Survey_Schedule.pdf). Stem diameters of each tree were used to assign each tree a rating of 'small', 'medium' or 'large', in line with the Natural England BNG User Guide. The rating corresponds to an area value to be used. Default distinctiveness and condition scores are given.

Distinctiveness values were automatically calculated for the site and habitat conditions were assessed both in the field, and retrospectively using site photos.

Strategic significance was assessed by reviewing the following:

- Haringey Biodiversity Action Plan⁵; and
- DEFRA's magic maps application⁶.

As the site forms part of the Down Lane Recreation Ground Site of Importance for Nature Conservation (SINC), all pre- and post-development habitats have been assigned 'high' strategic significance.

An initial BNG Baseline Assessment was undertaken in September 2022 (ref: 552104smSep22FV01_BNGBaseline). This was undertaken using the DEFRA Metric 3.1 as at the time, this was the most up-to-date tool. Subsequently this was updated to DEFRA 4.0. The baseline assessment has been updated with the most recent version of the tool, and the most recent condition assessment criteria were applied.

3.4 PROPOSED DEVELOPMENT CALCULATIONS

Landscaping habitat types were provided by Levitt Bernstein and then translated into the relevant UKHAB and Metric 4.0 habitats.

Targeted condition scores were assigned by Greengage, using the Metric 4.0 habitat condition criteria and species provided by Levitt Bernstein, whilst considering the likely future use and management of each area.

Due to no direct translation of some urban habitats into Metric 4.0, introduced shrub has been assigned to amenity planting habitats.

3.5 COMPETENCIES

Georgia Alfreds, who reviewed this report, has a degree in Geography (BSc Hons), an MSc in Environmental Biology: Conservation and Resource Management and is an Associate member of CIEEM with seven years' experience in ecological survey and assessment.

Daniel Perlaki, who undertook this assessment, has an undergraduate degree in Ecology (BSc Hons), a Master's degree in Conservation Science and Policy and is a Graduate member of CIEEM. Dan has over 6 years' experience in ecology survey and consultancy.

This report was written by Daniel Perlaki and reviewed and verified by Georgia Alfreds 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.

3.6 CONSTRAINTS

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

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

4.0 RESULTS

4.1 BASELINE CONDITIONS

The baseline biodiversity value of the site is calculated to be 66.80 biodiversity units associated with area-based habitats. A breakdown of this calculation is provided in Table 4.1:

Table 4.1 Baseline Biodiversity Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Biodiversity Units
Urban	Developed land, sealed surface	1.3171	Very low	N/A	0.00
Urban	Introduced shrub	0.1042	Low	N/A	0.24
Grassland	Modified grassland	5.3703	Low	Moderate	24.70
Grassland	Other neutral grassland	0.1055	Medium	Moderate	0.97
Urban	Allotments	0.0423	Low	Moderate	0.19
Individual trees	Urban tree	4.4235	Medium	Moderate	40.70
*Urban trees are not included in the total site area to avoid double counting				TOTAL	66.80

In accordance with Metric 4.0 guidance, 'Developed land; sealed surface', and 'Introduced shrub' have no condition assessment.

'**Modified grassland**' describes the majority of the grassland on site and is assigned moderate condition. This includes the playing fields and areas beneath the trees on site. It has a condition score of moderate as it passes condition assessment criteria requiring scrub encroachment to be less than 5% of the habitat area, has no bracken (*Pteridium aquilinum*), has less than 10% bare ground and there are no Schedule 9 invasive non-native species (INNS) present. However, it fails criteria which require it to have a mixed sward height, less than 5% physical damage from anthropogenic sources and has low species diversity (<8 vascular species per m²).

'**Other neutral grassland**' is present in two small patches which appear to be subject to a different management regime. Whilst it is considered to be a distinct habitat owing to its higher species richness, it fails condition assessment criteria requiring >10 species per m², close resemblance to UK HAB description and cover of sub-optimal species. However, it passes condition assessment requiring cover

of bare ground to be below 5%, cover of bracken <20% and having a varied sward length. Therefore, it is likely to achieve moderate condition.

'Allotments' are assigned a condition assessment score of moderate, as they provide a diverse source of nectar and pollen sources throughout the year due to the floral diversity and have no INNS present. However, only a single ecotone is present in the habitat, therefore it lacks habitat structure sufficient to achieve 'good' condition.

'Urban Trees' were assessed and given a habitat condition of moderate. They pass criteria requiring trees to be predominantly native, maintain cohesive canopy cover, have little impact of human health and they are planted within permeable ground. They fail condition assessment criteria requiring majority of trees to be mature and requiring trees to have natural ecological niches such as rot holes and deadwood.

The pre-development site also has 3.45 hedgerow units, as shown in Table 4.2:

Table 4.2 Baseline hedgerow units

Hedgerow type	Length (km)	Distinctiveness	Condition	Hedgerow Units
Line of trees	0.863	Low	Moderate	3.45
TOTAL				3.45

The line of trees is considered likely to achieve moderate condition as more than 70% were native, tree canopy appeared to be continuous, and the trees appeared to be healthy. In all cases the lines of trees were adjacent to hardstanding and lacked an undisturbed strip of 6m of vegetation on both sides.

4.2 PROPOSED SITE LAYOUT

Based on masterplan drawings, the proposed development is predicted to provide 79.33 biodiversity units as shown in Table 4.3.

Table 4.3 Post-Development Biodiversity Units

Broad Habitat	Habitat Type	Area (Hectares)	Distinctiveness	Condition	Biodiversity Units
Created habitats					
Grassland	Modified grassland	0.3916	Low	Good	2.11
Urban	Introduced shrub ¹	0.3474	Low	N/A	0.77
Heathland and scrub	Mixed scrub	0.0267	Medium	Poor	0.12
Urban	Introduced shrub ²	0.3015	Low	N/A	0.67
Urban	Rain garden	0.2001	Low	Good	1.16
Individual trees	Urban trees	1.0912	Medium	Moderate	3.84
Urban	Developed land, sealed surface	0.1899	Very low	N/A	0.00
Retained habitats					
Grassland	Other neutral grassland	0.1055	Medium	Moderate	0.97
Individual trees	Urban trees	4.4235	Medium	Moderate	40.70
Enhanced habitats					
Grassland	Modified grassland	5.3703	Low	Good	29.00
*Urban trees are not included in the total site area to avoid double counting				TOTAL	79.33

'Developed land; sealed surface' relates to all areas of hardstanding, building and impermeable surfaces within the proposed development design. The habitat has a pre-set condition within Metric 4.0 and does not contribute any biodiversity units to the calculation.

'**Introduced shrub**' refers to the proposed planting types "PL07, PL08, PL09, PL10 and PL11" from the proposed landscaping plans. These areas feature predominantly ornamental planting with variation depending upon space use (i.e. incorporation of willow tunnels in play space). '**Introduced shrub**²' refers to PL03 - Ashley woodland understorey planting. This planting type varies across the site, with some areas featuring native shrub understoreys and others being bark-mulched with bulbs planted. These habitats are not subject to condition assessments.

The proposed '**Modified grassland**' to be created is targeting good condition. Sections of 'PL02' planting will feature increased sward length with a relaxed mowing regime, and whilst no direct seeding is proposed, overseeding will be undertaken to boost species diversity if it has not reached 'good' condition requirements by year 3. All other condition assessment criteria are met due to the proposed management of scrub, removal of INNS and management of bare ground and damage from sports activities.

'**Rain garden**' describes the SUDs features along the eastern site boundary. This is considered likely to achieve good condition as it will provide diverse habitat structure, a wide flowering period and an absence of INNS. Furthermore, it will feature exclusively native wildflower species which are suited to wetland, riparian and partially inundated areas.

'**Mixed scrub**' describes the PL04 boundary hedge mix in areas along the eastern boundary which cannot be considered hedgerows as they are not linear habitat areas. These areas are considered likely to achieve poor condition as the species mix will not closely match any naturally occurring scrub habitat, there will be a uniform age profile of shrubs, and the habitat areas are insufficient in size to provide glades within the scrub habitat. However, as the areas of scrub feature PL02 modified grassland around their perimeter, they will have a well-developed edge. Furthermore, they will be managed to ensure no INNS establish.

Proposed '**Urban trees**' will reach moderate condition as they will have predominantly conjoined canopies which oversail vegetation, they will not show signs of anthropogenic impacts as damaged specimen will be replaced and they will be almost exclusively native species. However, they are not likely to mostly reach maturity within the time to target condition, and they are unlikely to develop natural ecological niches such as rot holes or deadwood, as these will be taken as signs of ill-health and warrant intervention. 268 trees are proposed to be planted. These have been categorized as 'small' using the Individual Tree Helper tool within the DEFRA Metric 4.0, in line with the methodology set out in the user guide, despite the fact that in the park setting the majority will actually reach the threshold for 'medium' size within the time to target condition.

The enhancement of the large areas of existing '**Modified grassland**' will predominantly be achieved through establishing PL02 areas with relaxed mowing regime across much of the habitat. Furthermore, it will be protected from damage from anthropogenic uses and species diversity will be improved through overseeding of LE02 areas where floral diversity does not naturally increase.

It is assumed that the '**Other neutral grassland**' will be retained. Whilst there are minor incursions into this habitat by proposed footpaths, it is recommended that the turf from these areas is transplanted into a proposed PL02 area.

The proposed development will also deliver 5.70 hedgerow units, as set out in Table 4.4.

Hedgerow type	Length (km)	Distinctiveness	Condition	Hedgerow Units
Enhanced hedgerow				
Native hedgerow with trees	0.863	Medium	Moderate	5.70
TOTAL				5.70

The enhancement of the existing line of trees will be delivered through the boundary hedgerow planting which will join up the tree lines and provide an intact hedge with diverse mix of native woody shrubs. This will achieve moderate condition as more than 70% will native, tree canopy will be continuous, and the trees will be maintained with damaged specimen replaced. Trees, however, will all be adjacent to hardstanding and lack an undisturbed strip of 6m of vegetation on both sides.

5.0 EVALUATION AND DISCUSSION

Under these proposals, the redevelopment of the park stands to result in a net gain of 12.52 biodiversity units associated with area-based habitats from pre-development levels. This corresponds to a total net increase of 18.74% in ecological value. All trading rules have been satisfied. Furthermore, the proposals stand to result in a net gain of 2.25 hedgerow units, which constitutes a net gain of 65.21%.

The proposals are therefore in compliance with local and national planning policy (see Appendix E). If proposals seek compliance with the BNG Mandate which seeks a 10% uplift in biodiversity units then additional habitat creation/enhancement will be required on site.

As referenced to in the PEA report, further qualitative ecological enhancement should also be targeted on site through the provision of invertebrate habitat features (such as pollinator posts or bee bricks), bird boxes (such as for swifts, black redstarts and garden birds) and bat boxes, to help protect nationally and locally important species, including those specified in the Southwark Council's biodiversity action plan.

Details on habitat enhancement and management to ensure delivery of BNG should be outlined in an Ecological Management Plan (EMP) which could be secured through planning condition.

The EMP should provide description of how habitats are to be created and managed for a period of at least 30 years.

6.0 SUMMARY & CONCLUSION

Greengage was commissioned by Haringey Borough Council to undertake a Biodiversity Net Gain Assessment a site known as Down Lane Park in order to assess the change in ecological value of the site in light of the proposed development.

This report demonstrates that the development proposals will result in a net gain of 12.52 biodiversity units and 2.25 hedgerow units should existing plans be adhered to, equivalent to a 18.74% increase in habitat units and 65.21% increase in hedgerow units. This represents compliance with local planning policy and exceeds the BNG Mandate which states a target of 10% net gain in biodiversity. All trading rules are satisfied.

Any further changes to the design will impact upon the BNG score and the metric will need to be updated to reflect such changes. This also carries forward throughout the entire lifetime of the project, including after planning permission has been granted, in and throughout the construction phase. Habitat condition criteria in Appendix C must also be adhered to. Any changes must be reflected in the biodiversity metric.

Details on any habitat creation and its ongoing management should be agreed with the Local Planning Authority and described in an EMP (secured by planning condition) for the site. The EMP must provide description of how habitats are to be created, managed and maintained for a period of at least 30 years.

APPENDIX A SITE PLAN AND HABITAT MAP



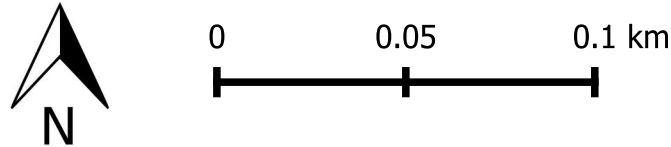
Down Lane Park

- 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



Greengage Environmental Ltd
9 Holyrood Street, London SE1 2EL
www.greengage-env.com

**Fig 1.0 Bat Potential
Roosting Feature Map**



APPENDIX B LANDSCAPING PROPOSALS