

Peter Marsh Consulting Ltd.

Ecological Services

Preliminary Ecological Appraisal

Capital City College Group (CCCG) College of Haringey,
Enfield and North-East



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Executive Summary

Purpose	This report presents a Preliminary Ecological Appraisal (PEA) for the site of a proposed replacement of the existing Building Block on the College of Haringey, Enfield and Northeast London Tottenham site (National Grid reference: TQ 33701 89225). The report has been prepared to establish the site's suitability for development, inform the design process for the proposal, record the ecological baseline and identify key ecological features within and around the proposal site.
Introduction	A Preliminary Ecological Appraisal, consisting of a field survey and desk study, was undertaken in August 2023. The PEA report was completed in consideration of the Chartered Institute of Ecology and Environmental Management (CIEEM) Preliminary Ecological Appraisal (2017) guidelines, the UKHab Classification User Manual (UKHab Version 2.0, 2023) and British Standard 42020 (2013) 'Biodiversity – Code of Practice for Planning and Development'. Capital City College Group, Haringey, is a vocational college with a wide range of courses, one of several Capital City College Group centres throughout the city. Internally, the Site consists of a number of classrooms, media studios and open courtyard space. The main building is comprised of well-sealed red brick with a glass extension on the east side of the building by the reception. The block being replaced is of the same material as the main building and is also well sealed. There are a couple non-permanent classroom blocks which are in good condition.
Key Findings	Habitats - An extended UK Habitat Classification survey habitat survey was undertaken which revealed that the site comprises of urban buildings with courtyards that contain scattered trees and some limited areas of introduced shrub. Designated Sites - there were several statutory designated sites present within the search area, including the Lee Valley Special Protection Area (SPA) and Ramsar, Walthamstow Reservoirs Site of Special Scientific Interest (SSSI), Railway Fields Local Nature Reserve (LNR and Springfield Park LNR. In addition, there were 8 Sites of Importance for Nature Conservation (SINCs) present within the search area. However, given the urban nature of the site there is limited connectivity between the site and the designated sites, thereby restricting the zone of influence. Birds – opportunities for nesting birds were present throughout the site, with a feral pigeon nest was identified within the wider site. Bats – the buildings were considered to hold negligible potential for roosting bats, with negligible potential for commuting/ foraging bats given the highly urban context of the area. Invasives etc species (LISI) - Extensive butterfly bush (<i>Buddleja davidii</i>) stands are located throughout the site. Appropriate mitigation measures, in line with BS 42020, have been identified to ensure biodiversity is considered throughout the development and ensure any potential risk to programme and biodiversity is minimised throughout.
Recommendations	Nesting Birds -Any vegetation clearance or building demolition should be undertaken outside of the bird nesting season (March – August). If works are required to be undertaken within bird nesting season a suitably qualified ecologist should inspect the vegetation no more than 24 hours before clearance. Bats- No further surveys or mitigation actions are required. Other Mammals – It is possible that common wild mammals such as foxes (<i>Vulpes vulpes</i>) may venture onto the Site during the refurbishment and construction of the proposed project. Measures such as covering all deep holes and trenches overnight, planked escape routes from excavations, and storing liquids safely will reduce the risk of harm to wild mammals, which are protected by the Wild Mammals (Protection) Act 1996 from unnecessary suffering by certain measures. Invasive species - It is recommended that the stands of self-set butterfly bush present throughout the Site are removed, in order to reduce the risk of spread when disturbed during works. Their replacement with native species planting will increase the value of the Site for local biodiversity.
Conclusions	Based on the findings of the PEA, the site is considered to hold low ecological value, although the presence of scattered trees enriches the biodiversity value of the site and would attract slightly higher value than the artificial habitats. The Proposed Development provides exciting opportunities for biodiversity enhancement such as wildlife friendly planting, the provision of bat and bird boxes and the inclusion of green roofs to compensate for any vegetation loss on the site to contribute to urban greening.

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1 Purpose of the document

1.1.1 The purpose of this document is to provide information regarding any protected and /or notable habitats and species that occur or have the potential to occur on or near the potential location for development and identify the potential impacts of the work.

1.1.2 This assessment has been designed to meet:

- Chartered Institute of Ecology and Environmental Management 'Guidelines for Preliminary Ecological Appraisal' (2017);
- Chartered Institute of Ecology and Environmental Management 'Guidelines for Ecological Impact Assessment (EclA)' (2018);
- British Standard 42020 (2013) 'Biodiversity – Code of Practice for Planning and Development'.

1.1.3 The objectives are to:

- Identify any designated sites for nature conservation and habitats on, near and adjacent to the site;
- Identify any notable and/ or protected plant or animal species of nature conservation value, which may occur on or near the site;
- Identify the presence of any invasive plant species on or adjacent to the site;
- Provide a habitat map with target notes of ecological features as identified above;
- Undertake a preliminary assessment of the potential impacts on any ecological receptors of conservation value identified on, near or adjacent to the site;
- Input into the embedded design in terms of biodiversity net gain; and
- Recommend further surveys, mitigation, and enhancement measures as appropriate.

1.2 Validity of data

1.2.1 The findings of this study are valid for a period of 24 months from the survey on 24th August 2023. If works have not commenced within two years of this date, then an updated site visit should be carried out by a suitably qualified ecologist to assess any changes in the habitats present on site, and to inform a review of the conclusions and recommendations made.

2 Introduction

2.1 Background Information

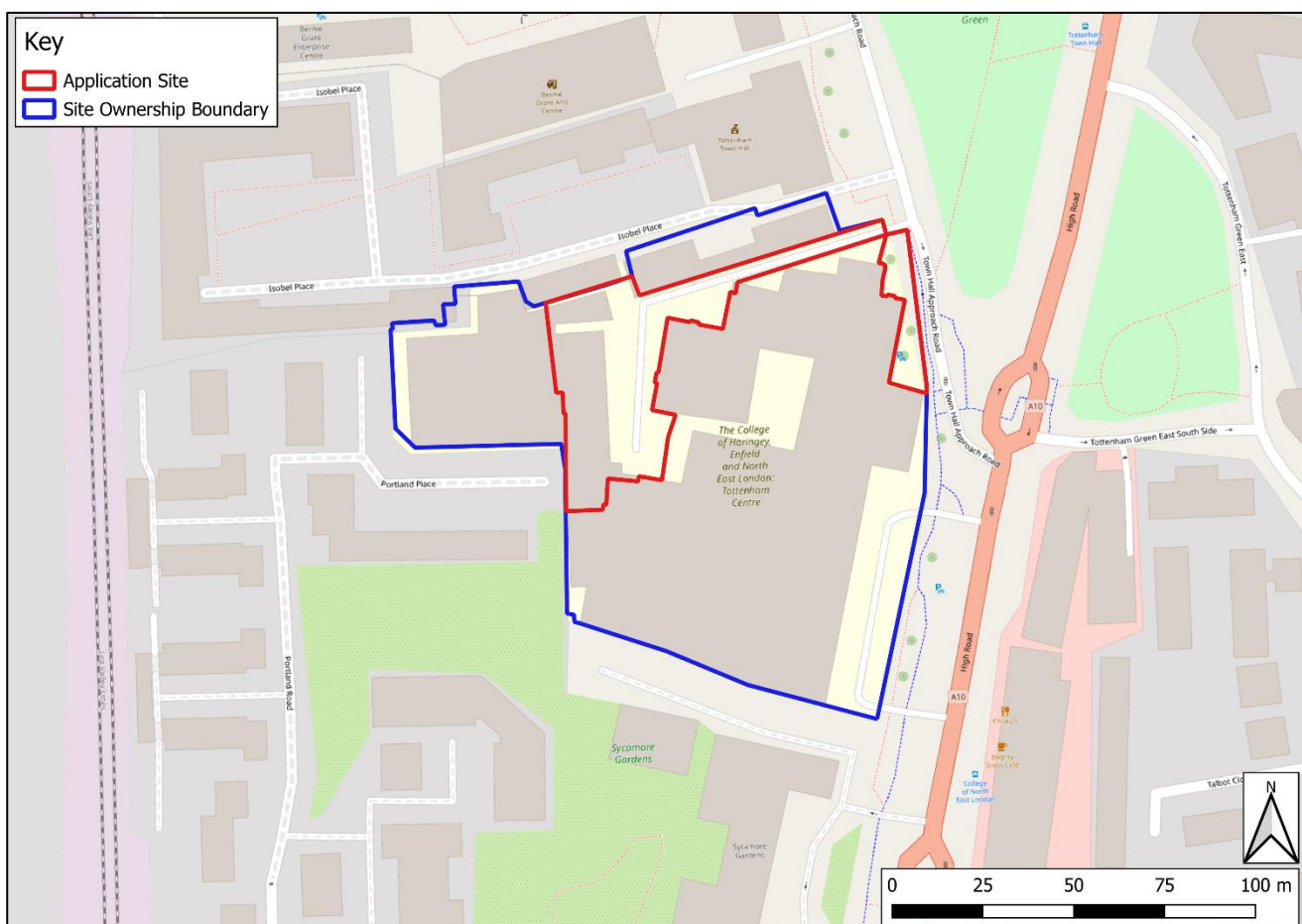
2.1.1 Assystem was appointed by Peter Marsh Consulting Ltd. to carry out an extended UK Habitat Classification survey (UKHab) of Capital City Collage Group (CCCG) The College of Haringey (centre site grid reference TQ 33701 89225) in order to prepare a Preliminary Ecological Appraisal (PEA) to assess whether the site is a viable location for potential development. This is the wider campus which we have surveyed. A site wide Masterplan is being brought forward (see the Design and Access Statement) which will be implemented in phases. The first phase is a new Construction and Engineering Centre on the site shown dotted in red.

- 2.1.2 By undertaking an investigation of the habitats and species present, this report will provide the Applicant with a greater understanding of the ecological value of the area. It identifies any potential risks, obligations and restrictions that may be necessary to guarantee compliance with wildlife legislation. Along with any potential opportunities to increase the local biodiversity.

2.2 Site Description

- 2.2.1 Capital City College Group, Haringey, is a vocational college with a wide range of courses, one of several Capital City College Group centres throughout the city. Internally, the site consists of a number of classrooms, media studios and open courtyard space.
- 2.2.2 The overall college site is approximately 1.99 ha in area, bounded by the A10 road to the east, a residential area to the south and north of the site and the railway tracks and further housing to the west. However, the Application Boundary reflects only part of the wider college site, comprising the area for the new Construction and Engineering Centre and associated access. The site ownership boundary and application boundary are identified in Figure 2-1.

Figure 2-1: Site and Application Boundary (Contains map data from © OpenStreetMap)



2.3 Scope of Works

2.3.1 The following surveys were commissioned Peter Marsh Consulting Ltd and form part of this PEA:

- Desktop study and ecological data search;
- Biodiversity Net Gain (BNG) assessment¹; and
- Extended UK Habitat Classification survey (UKHab) (extended to include a protected species search). The condition of habitats was recorded during the UKHab survey, where the data collected can inform the BNG baseline calculations.

2.4 Planning Policy

2.4.1 National, regional, and local planning policies help guide the proposed development. The following paragraphs identify relevant planning policies and discuss these in the context of the site.

National

2.4.2 Under the Natural Environment and Rural Communities (NERC) Act 2006, “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”. To comply with this ‘Biodiversity Duty’, planning decisions must ensure that they adequately consider the potential ecological impacts of a proposed development.

2.1.2 National policy guidance is provided by National Planning Policy Framework (NPPF)² which sets out the Government's planning policies for England and how they should be applied. Chapter 15 provides information specific to the protection of the natural environment, with Paragraph 180 identifying that planning decisions should contribute to and enhance the natural and local environment by:

- Protecting and enhancing site of biodiversity value;
- Recognising the wider benefits from natural capital and ecosystem services;
- Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

2.1.3 Paragraph 186 identifies a number of principles that should be applied in determining planning applications, which include:

- If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then planning permission should be refused;
- Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments) should not normally be permitted. The only exception is where the benefits of the development in the location

¹ The Biodiversity Net Gain Assessment has been reported separately to allow for constraints to be communicated ahead of the design freeze.

² Ministry of Housing, Communities and Local Government (2023) National Planning Policy Framework.

proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs;

- Opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

2.1.4 Further supporting information regarding the application of planning policy is provided in Planning Practice Guidance (PPG)³. The PPG identifies that information on biodiversity impacts and opportunities should inform all stages of development, with planning applications requiring an ecological survey where the type and location of development are such that the impact on biodiversity may be significant and existing information is lacking or inadequate (Paragraph 18).

Metropolitan

2.4.3 Metropolitan policy guidance is provided by The London Plan⁴, which provides strategic planning direction at the Greater London scale, produced by the GLA and setting out a framework of economic, environmental transport and social policies for the development of London. Policy G6 on Biodiversity and Access to Nature provides the principal policy for the protection and enhancement of biodiversity. The Policy identifies that *'development should manage impacts on biodiversity and aim to secure net biodiversity gain'* and that Sites of Importance for Nature Conservation (SINCs) should be protected or, where impacts are unavoidable, the benefits of the development clearly outweigh the impacts on biodiversity the mitigation hierarchy applied to minimise development impacts.

2.4.4 Policy G5, urban greening within the London Plan aims to encourage the urban greening factor through three approaches and states: *'All major developments should contribute to the greening of London, boroughs should develop and Urban Greening Factor (UGF) to identify the amount of urban greening required in new developments and existing green cover retained on site should count towards developments meeting the interim target scores'*.

2.4.5 Policy G1 (Green Infrastructure) requires development to integrate green infrastructure that connects with London's wider green infrastructure network and Policy G7 (Trees and Woodland) places an emphasis on the retention of existing trees of value where possible.

Local

2.4.6 Local planning policy is provided by Haringey's Local Plan⁵, which sets out local planning policies and how they should be applied. Policy SP13 (Open Space and Biodiversity) identifies that *'all development shall protect and improve sites of biodiversity and nature conservation, including private gardens through its:*

- *Contribution to wildlife and ecological habitats and, where possible, include green and brown roofs, rainwater harvesting, green walls, bird and bat nesting/roosting opportunities;*
- *Protection, management and maintenance of existing trees and the planting of new trees where appropriate; and*
- *Protection, enhancement and creation of Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves (LNRs)'.*

³ Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance – Natural Environment.

⁴ Greater London Authority (2021) The London Plan, The Spatial Development Strategy for Greater London, March 2021.

⁵ Haringey (2017) Haringey's Local Plan. Strategic Policies 2013 – 2026. March 2013, Consolidated with alterations since 2017.

2.5 Proposed Development

- 2.5.1 If the location is deemed to be viable for development, the Applicant is seeking to replace the existing Building Block on the College of Haringey, as the building block is of poor condition and is no longer fit for purpose.

2.6 Quality Assurance

- 2.6.1 All lead Assystem ecologists are members of (at the appropriate level) the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct when undertaking ecological work.
- 2.6.2 Assystem are a CIEEM Registered Practice, and as such champion high professional standards whilst delivering the best outcomes for biodiversity and supporting a thriving economy.

3 Methodology

3.1 Zone of Influence

- 3.1.1 The Zone of Influence (Zoi) is the area over which the ecological features identified may be subject to significant effects because of the Proposed Development. These will vary between ecological receptors.

3.2 Study Area and Survey Area

- 3.2.1 The PEA considers the presence of potential receptors across two geographical areas, the study area and the survey area. The study area comprises an area of 1 km from the overall site boundary in which the presence of biodiversity features, including designated sites, notable habitats and records of protected species are identified to help consider potential impacts on features beyond the site boundary but also to provide context to the biodiversity potential for the site. Due to the site's location within a heavily urban area and lack of ecological connectivity to the site, 1 kilometre (km) was deemed an appropriate distance for the data search, however due to the more sensitive nature of nationally and internationally designated sites the study area for these has been extended to 2 km and 5 km respectively for identification of potential receptors.
- 3.2.2 For the purposes of the assessment, the survey area comprises the overall site, as identified by the Blue Line Boundary in Figure 2-1, plus land immediately adjacent to the site where applicable and comprises the area over which the walkover survey considers the presence of biodiversity features directly influenced by the development of the site.

3.3 Desk Study

- 3.3.1 An ecological desk study was undertaken to determine the presence of any designated sites for nature conservation, habitats of conservation importance and protected and notable species that occur within 1 kilometre (km) of the site. Due to the site's location within a heavily urban area and lack of ecological connectivity to the site, 1 km was deemed an appropriate distance for the data search.

Further data was obtained from Greenspace information for Greater London (GiGL) and the Multi-Agency Geographic Information for the Countryside (MAGIC) website.

- 3.3.2 Only records from within the last ten years and considered relevant to the site have been included in this report.

Table 3-1 Sources of desk study records

Source	Information Requested
Greenspace Information for Greater London (GiGL)	All notable/ protected species (1 km) Non-statutory sites (1 km) Priority Habitats (1 km)
Multi-Agency Geographic Information for the Countryside	International statutory sites (5 km) All statutory sites (2 km)

- 3.3.3 The search buffers listed in Table 3-1 are sufficient to cover the potential ZOI of the Proposed Development. For protected and priority species, and sites of local importance, the impacts of the Proposed Development were not expected to exceed 1 km, due to the urban setting of the site and lack of ecological connectivity.
- 3.3.4 For International designated and National sites, the search buffer was extended to 5 km and 2 km respectively.
- 3.3.5 Impact Risk Zones (IRZs) are a tool developed by Natural England to help assess the potential risks to Nationally or Internationally Designated Sites of Nature Conservation Importance posed by development proposals. IRZs for this report were located using magic.defra.gov.uk, and reviewed against the Proposed Development proposals to understand if the Local Planning Authority would need pre-application advice from Natural England.

3.4 Extended UK Habitat Classification survey

- 3.4.1 A field survey in the form of an 'extended' UK Habitat Classification survey was undertaken by Maxine Hendy, an assistant ecologist with over a year's experience in ecological surveying, and Poppy Anson, a graduate ecologist, on 24th August 2023.
- 3.4.2 All habitats within the survey area were identified and mapped in compliance with the 'UK Habitat Classifications'⁶ and associated definitions. The dominant plant species were recorded and any protected, uncommon or invasive species, listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) or identified by the London Invasive Species Initiative (LISI), were noted.
- 3.4.3 Consideration was given to the potential for the Site to support Priority Habitats and Priority Species, as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006).
- 3.4.4 The protected species and Priority Habitats considered relevant to the assessment, based on geographical region and the presence of suitable habitats within the site, were as follows;
- Bats: assessment of trees and buildings for their potential to support roosting bats,
 - Nesting birds (including Schedule 1): assessment of habitat for their suitability for nesting birds; and
 - Invertebrates: assessment of the habitat suitability to support a notable population of invertebrates.

⁶ UKHab Ltd. (2023) UK Habitat Classification, Version 2.0

3.5 Condition Assessment

- 3.5.1 Each area of habitat was assigned a condition score based on the relevant 'habitat condition sheet' as per the Statutory Biodiversity Metric – Technical Annex 1⁷.
- 3.5.2 Habitat parcels are assigned one of three categories: Good, Moderate or Poor. If condition varies across an area of the same habitat type, the habitat will be split into separate parcels, each assigned a different condition category.
- 3.5.3 Certain habitat categories are allocated a fixed condition score and do not need their condition assessed, such as Rhododendron scrub, certain urban habitats, extensive green roofs and young tree planting,
- 3.5.4 Completed habitat condition sheets for each parcel of habitat are provided within the appendices.

3.6 Assessment and Evaluation

- 3.6.1 This PEA has been produced in broad accordance with CIEEM's Guidelines for Preliminary Ecological Appraisal⁸ and Guidelines for Ecological Report Writing⁹.
- 3.6.2 Where relevant and appropriate, the evaluation of ecological features and the potential ecological impacts of the proposals have followed CIEEM's Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine¹⁰.
- 3.6.3 The level of value of specific ecological receptors is assigned using a geographic frame of reference, with international, national, regional, county (metropolitan), district, local and site only value in descending order.
- 3.6.4 A negligible value is assigned where the habitat offers minimal value to wildlife. Where best practice guidelines are unavailable or unclear, experienced ecologists have used their judgement to assess and categorise the suitability of habitats for protected and/or notable species, refer to Table 3-3.
- 3.6.5 The need and scope for additional species surveys has been determined based on the suitability of the habitats for protected and/or notable species, the potential impacts of the Proposed Development and the nature of the legal protection afforded to the species likely to be present.
- 3.6.6 Value judgements are based on various characteristics that can be used to identify ecological resources or features likely to be important in terms of biodiversity. These include site designations (such as Sites of Special Scientific Interest), or for undesignated features the size, conservation status (locally, nationally or internationally), and the quality of the ecological resource. In terms of the latter, 'quality' can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

⁷ Defra (2023) The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology.

⁸ CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

⁹ CIEEM (2017) Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.

¹⁰ CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.2. Chartered Institute of Ecology and Environmental Management, Winchester.

Table 3-2: Scale of Constraints

Likelihood	Definition
High	An actual or potential constraint that is subject to relevant legal protection and is likely to be a material consideration in determining the planning application (e.g., statutory nature conservation designations and European/nationally protected species). Further survey likely to be required (as detailed in this report) to support a planning application.
Moderate	An actual or potential constraint that is covered by national or local planning policy and depending on the level of the potential impact because of the Proposed Development may be a material consideration in determining the planning application. Further survey may be required to support a planning application
Low	Unlikely to be a constraint to the Proposed Development or require further survey prior to submission of a planning application. Mitigation is likely to be covered under Construction Environmental Management Plan (CEMP) or precautionary working method statement (e.g., generic requirements for the management of nesting bird risks).

4 Limitations

- 4.1.1 Biological records can be received from a wide variety of sources and may or may not be comprehensive and accurate. However, if assessed in conjunction with a UK habitats survey, they can contribute to a robust ecological assessment of a site.
- 4.1.2 The desk study and field survey will not produce a comprehensive list of plants and animals as this will be limited by factors that influence their presence (e.g., activity and dormancy periods). An assessment can however be made of the habitats within the survey area, their nature conservation value and potential to support protected or priority species.
- 4.1.3 Despite the limitations described, there are deemed to be no significant limitations to this PEA.

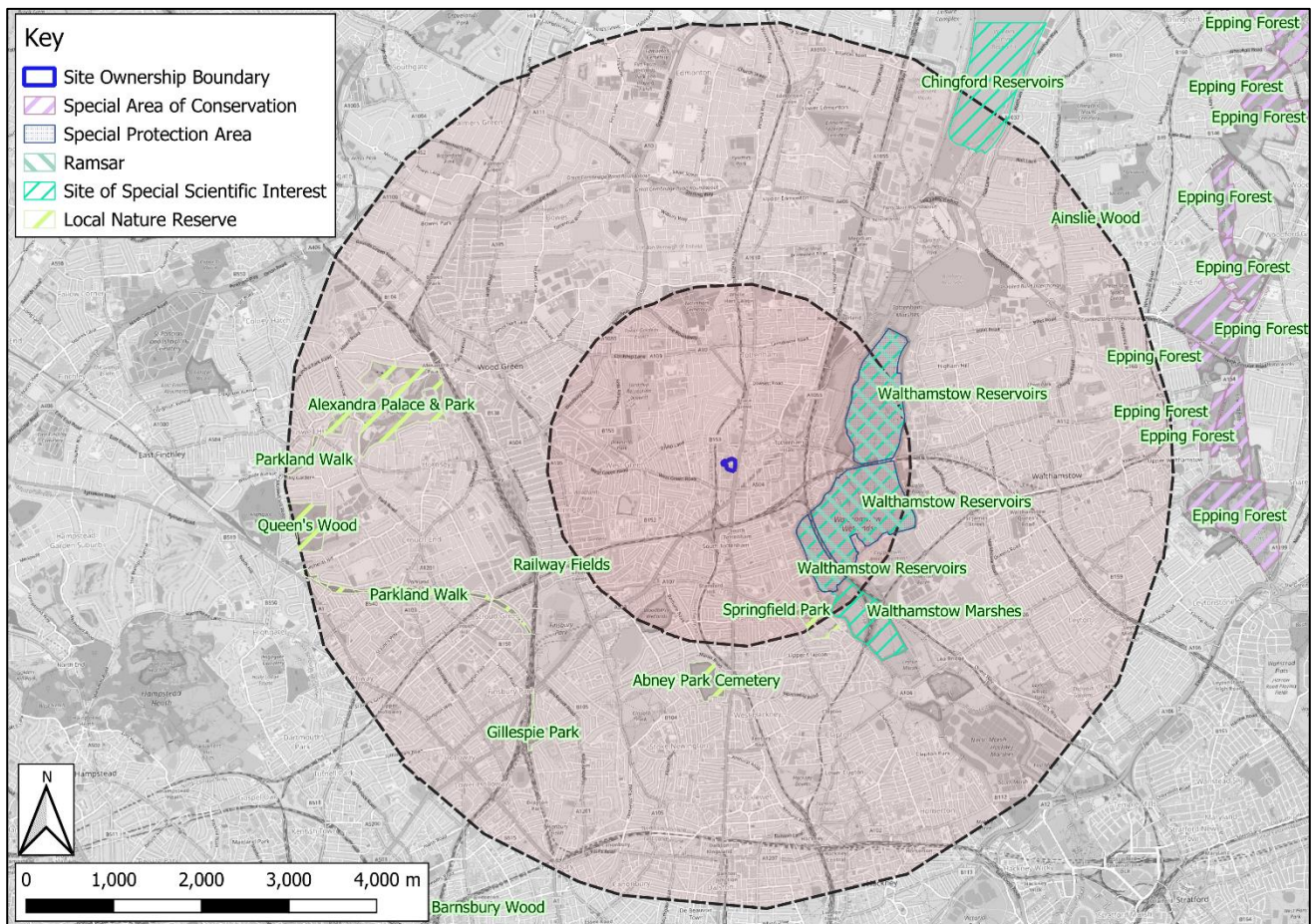
5 Results

5.1 Desk Study

Statutory Designated Sites

- 5.1.1 The study area includes a number of statutory designated sites, including the Lee Valley Special Protection Area (SPA) and Ramsar, Walthamstow Reservoirs Site of Special Scientific Interest (SSSI) and two Local Nature Reserves (LNRs), Springfield Park LNR and Railway Fields LNR. The location of these are identified in Figure 5-1.

Figure 5-1: Statutory Designated Sites within the Study Area (Contains Ordnance Survey and public sector information licensed under the Open Government Licence v3.0 and maps data from © OpenStreetMap)



- 5.1.2 The Lee Valley SPA, located c 980 m to the south-east of the site, comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats. The site receives designation as a SPA under Article 4.1 as it is regularly used by 1% or more of the Great Britain population of bittern (*Botaurus stellaris*) in any season and under Article 4.2 as it is regularly used by 1% or more of the biogeographical populations of migratory shoveler (*Anas clypeata*) and gadwall (*Anas strepera*) in any season. Although not a qualifying interest for the site, nationally important numbers of cormorant (*Phalacrocorax carbo*), great crested grebe (*Podiceps cristatus*), tufted duck (*Aythya fuligula*), pochard (*Aythya ferina*) and grey heron (*Ardea cinerea*) are supported on the site. The Ramsar designation is under Criterion 2, as it supports the nationally scarce plant whorled water-milfoil (*Myriophyllum verticillatum*) and rare or vulnerable invertebrate *Micronecta minutissima* (a water boatman), and Criterion 6, as it supports shoveler and gadwall at levels of international importance.
- 5.1.3 The Walthamstow Reservoirs SSSI, located c. 980 m to the south-east, covers the extent of the Lee Valley SPA and Ramsar and extends to additional habitat to the south. The SSSI is designated as the site contains one of the country's major heronries and a particularly large concentration of breeding wildfowl. The site is also an important gathering area for moulting tufted duck and in winter attract nationally significant populations of wildfowl and other wetland birds.
- 5.1.4 The Railway Fields LNR, located c. 2km to the south-west, comprises an area of habitat alongside the railway line that includes woodland, meadow, hedgerow, pond, marsh and river habitats that support

a range of species including ancient field maple (*Acer campestre*), reptiles, bats, invertebrates and birds. Springfield Park LNR, located c. 1.7 km to the south-east, receives designation for its geological interest, and therefore is not of relevance to this assessment.

5.1.5 The site is in the Impact Risk Zone for the Walthamstow Reservoir SSSI, however for non-residential developments the threshold for potential impacts is developments outside existing settlements/urban areas where the net additional gross internal floorspace is >1,000 m² or footprint of development >0.2 ha. As the site is located within an existing urban area, the development is not of a type expected to cause impacts to the designated site.

5.1.6 In addition to the above, whilst outside of the study area, the Epping Forest Special Area of Conservation (SAC) and SSSI is located c. 5.2 km to the east. Whilst residential development falling within the 6.2km zone of influence has potential for recreational impacts, this does not extend to non-residential development with impacts unlikely and therefore, no further consideration is given.

Non-statutory designated sites

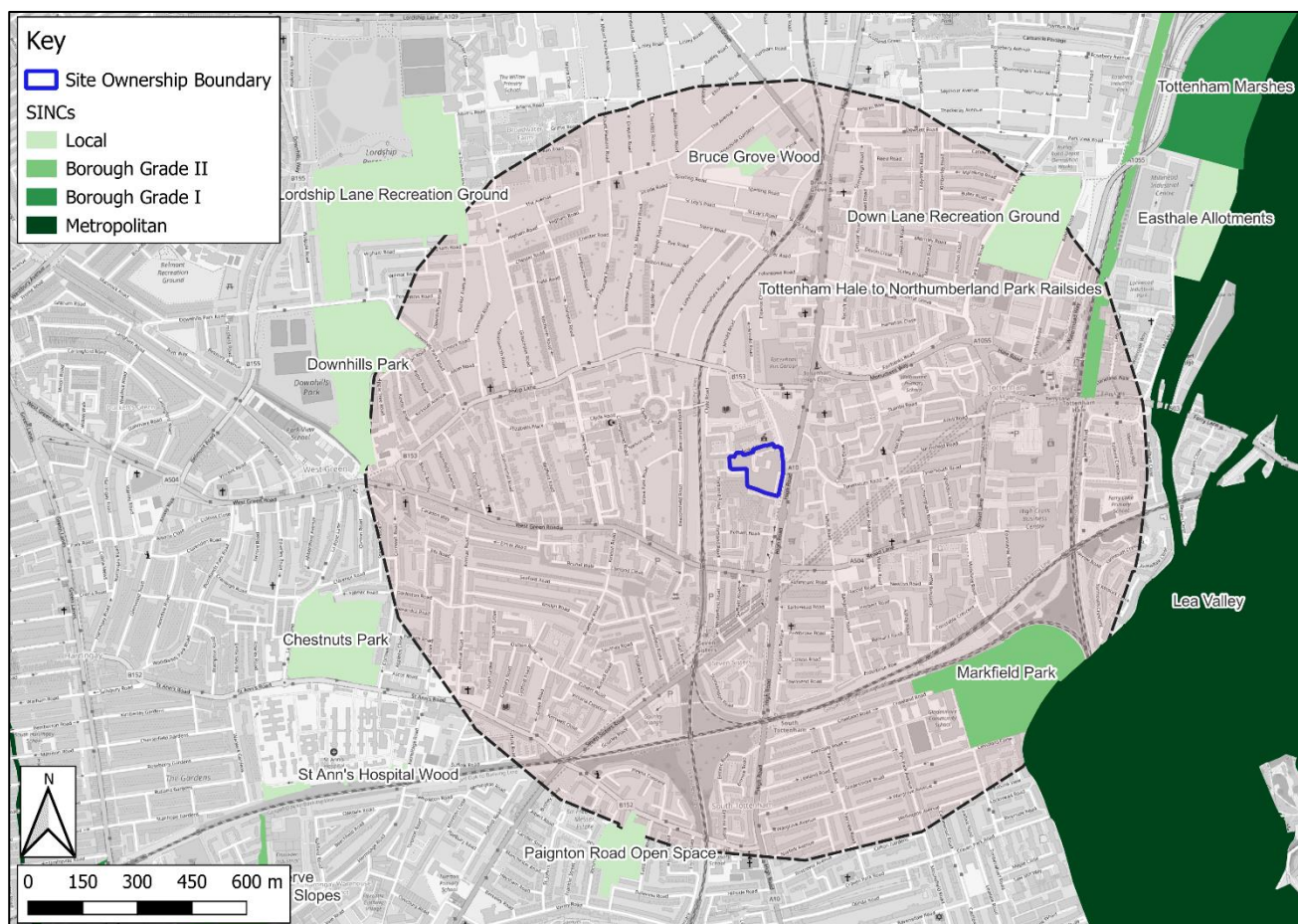
5.1.7 A desk-based search show that there are 8 SINCs within the Zol. Table 5-1 shows the non-statutory designated sites within 1 km of the Site with Figure 5-2 identifying their location relative to the Site.

Table 5-1: Non-Statutory Designated Sites

Site Number & Name	Details	Distance and direction from Site (m)
Metropolitan Importance		
M071 Lea Valley	This large site includes the River Lee Navigation, River Lea and associated watercourses downstream to the tidal limit in Tower Hamlets; Rammey Marsh; King George V and William Girling Reservoirs; Walthamstow Marshes and Reservoirs; and the new Middlesex Filter Beds nature reserve. The river below the tidal limit is included in the River Thames and tidal tributaries Metropolitan Site.	957 E
Borough Grade II		
HgBII11 Tottenham Railsides	This site consists of the triangles of land at South Tottenham junction and West Junction, and the railsides, mostly on embankments, between Railway Fields and the Lea valley. The triangles contain willow (<i>Salix</i> spp.) woodland, a rare habitat in London, and there is a pond in the eastern triangle. The embankments support sycamore (<i>Acer pseudoplatanus</i>) woodland with areas of rough grassland, tall herbs and scrub. The site as a whole provides a substantial area of relatively undisturbed habitat, and is an important corridor leading from the Lea valley into the more built-up parts of the borough.	697 S
HgBII14 Markfield Park	This small park adjacent to the River Lea 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. Old walls and other concrete and stone structures, well used by a local youth project for graffiti-style art, support a remarkable range of rare plants: this is one of only two or three London sites for the nationally scarce wall bedstraw (<i>Galium parisiense</i>), which grows alongside several locally rare ferns, including rustyback (<i>Ceterarch officinarum</i>), common polypody (<i>Polypodium vulgare</i>) and maidenhair spleenwort (<i>A. trichomanes</i>).	774 SE
HgBII15 Tottenham Hale to Northumberland Park Railsides	This long stretch of vegetated railsides contains a good range of habitats. Much of the site is a mosaic of rough grassland and scrub of bramble, sallows and <i>buddleia</i> , with a scattering of silver birch trees. There are some areas of more mature woodland, dominated by sycamore, and patches of tall herbs. The rare hybrid "Wurzell's wormwood" (<i>Artemisia vulgaris x verlotiorum</i>) is abundant around Northumberland Park station.	869 NE

Site Number & Name	Details	Distance and direction from Site (m)
Local		
HgL09 Downhills Park	This sizeable park has excellent tree cover, in places forming a woodland structure over dense shrubberies. Native species, including hornbeam (<i>Carpinus betulus</i>), hawthorn (<i>Crataegus monogyna</i>) and pedunculate oak (<i>Quercus robur</i>), predominate, and there are also some fine specimens of exotic species such as cork oak (<i>Q. suber</i>) and cedar of Lebanon (<i>Cedrus libani</i>), all surviving from the original 19 th century planting. The park supports good populations of common birds, including song thrush and mistle thrush, and the declining spotted flycatcher has bred in recent years. Downhills Park won a Green Flag Award for 2006/7	992 W
HgL14 Paignton Road Open Space	This small park has numerous trees, including old fruit trees which may be important for invertebrates. Hedges and dense shrubbery provide cover for birds and other animals, and there are small areas of meadow and ruderal habitats. The nationally scarce musk stork's-bill (<i>Erodium moschatum</i>) is established in the grassland. Free public access. Of interest to botanists, grey snake-bark maple (<i>Acer rufinerve</i>) has reproduced here by seedlings from planted trees, only the second time it has been recorded as self-established in the British Isles.	996 SW
HgL17 Down Lane Recreation Ground	Until a few years ago, this site was a typical recreation ground, with extensive mown grass and lines of trees around the edge. However, Haringey Council has recently planted up plots of native trees, including birch (<i>Betula pendula</i>), hazel (<i>Corylus avellana</i>) and wild cherry (<i>Prunus avium</i>). In these areas the grass is left to grow up, allowing wild flowers to become established. These enhancements give the site an air of naturalness in an otherwise urban setting.	761 NE
HgL22 Bruce Grove Wood	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 woodland contains some venerable planted trees, including a very large beech (<i>Fagus sylvatica</i>). A planning agreement from a nearby redevelopment has provided funding for management of the site, to allow educational use by the school.	753 N

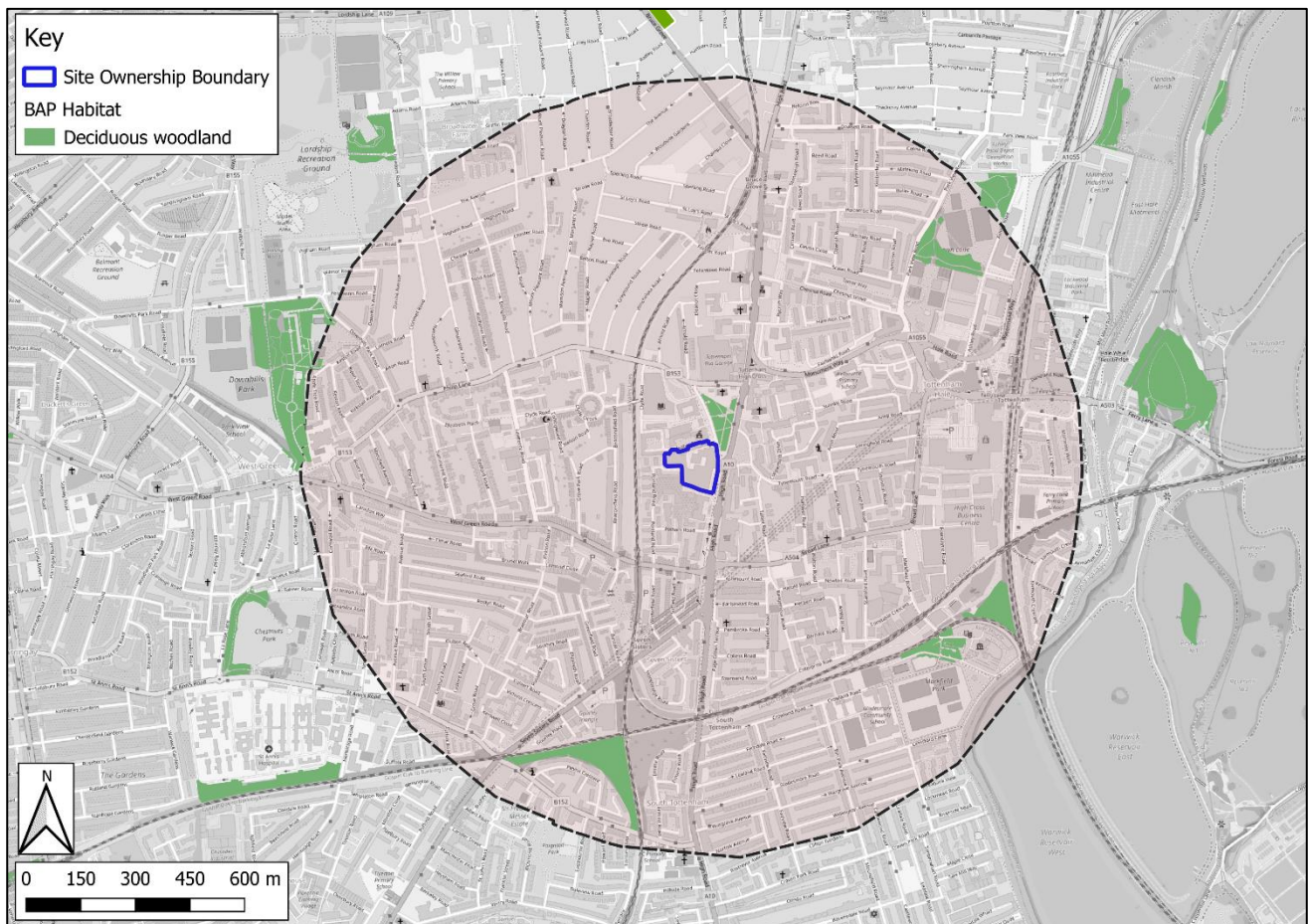
Figure 5-2: Redline boundary SINC map (Dataset created by Greenspace Information for Greater London CIC (GiGL), 2022, and contains maps data from © OpenStreetMap)



5.2 Priority Habitats

- 5.2.1 Priority habitats include those listed in Section 41 of the Natural Environment and Rural Communities Act (2006) habitats of principal importance as well as those listed in the habitats of principal importance. The study area includes a single BAP priority habitat, deciduous woodland, with the closest being Tottenham Green c. 10 meters from the site on the distant side of Town Hall Approach. However, the habitat is distanced from the proposed works and, due to the urban nature of the site, it has low connectivity to the woodland habitat.

Figure 5-3: Non-Statutory Designated Sites within the Study Area (contains public sector information licensed under the Open Government Licence v3.0 and contains maps data from © OpenStreetMap)



5.3 Protected or Notable Species Records

- 5.3.1 The MAGIC website showed there is one record of a previous application for European Protected Species (EPS) development licences within 1 km of the survey area.
- 5.3.2 Records of protected and/or notable species have been obtained from the GiGL reports, see Table 5-2. Ones considered potentially relevant to the Site have been included. There are 6 noteworthy species of invertebrates, 1 noteworthy species of reptile, and 1 noteworthy species of mammal (excl. bats), 8 noteworthy species of bats and 15 noteworthy species of plant within 1 km of the site.

Table 5-2: Protected and notable species records from GiGL

Species	Scientific Name	Number of records	Date of most recent record	Distance of nearest record (m) from Site
Birds				
Swift	<i>Apus apus</i>	41	27/07/2021	317 NW
House martin	<i>Delichon urbicum</i>	3	10/09/2014	947 N
Herring Gull	<i>Larus argentatus</i>	7	17/03/2019	689 NE
Lesser Black-backed Gull	<i>Larus fuscus</i>	3	27/06/2017	523 SE
Baltic Gull	<i>Larus fuscus fuscus</i>	4	13/01/2019	510 S

Species	Scientific Name	Number of records	Date of most recent record	Distance of nearest record (m) from Site
Red Kite	<i>Milvus milvus</i>	1	26/03/2017	947 N
Grey Wagtail	<i>Motacilla cinerea</i>	6	30/03/2015	1000 SE
Spotted Flycatcher	<i>Muscicapa striata</i>	2	29/08/2015	947 N
House Sparrow	<i>Passer domesticus</i>	35	27/06/2017	523 SE
Dunnock	<i>Prunella modularis</i>	3	17/03/2019	689 NE
Starling	<i>Sturnus vulgaris</i>	19	25/10/2022	843 E
Redwing	<i>Turdus iliacus</i>	5	19/12/2017	1000 E
Song Thrush	<i>Turdus philomelos</i>	6	18/03/2019	510 S
Fieldfare	<i>Turdus pilaris</i>	2	19/12/2017	1000 E
Ring Ouzel	<i>Turdus torquatus</i>	1	17/04/2014	957 N
Mistle Thrush	<i>Turdus viscivorus</i>	9	21/12/2014	957 N
Invertebrates				
Roman Snail	<i>Helix (Helix) pomatia</i>	1	2012	1000 E
Stag Beetle	<i>Lucanus cervus</i>	5	01/06/2018	712 W
Common Darter	<i>Sympetrum striolatum</i>	6	2022	Within study area
Small Copper	<i>Lycaena phlaeas</i>	2	26/06/2022	Within study area
Large skipper	<i>Ochlodes sylvanus</i>	3	02/06/2020	Within study area
Small Skipper	<i>Thymelicus sylvestris</i>	7	06/07/2022	Within study area
Mammals (bats)				
Daubenton's Bat	<i>Myotis daubentonii</i>	6	29/08/2021	814 S
Whiskered Bat	<i>Myotis mystacinus</i>	2	01/09/2017	814 S
Lesser Noctule	<i>Nyctalus leisleri</i>	2	01/09/2017	814 S
Noctule Bat	<i>Nyctalus noctula</i>	3	01/09/2017	523 SE
Nathusius's Pipistrelle	<i>Pipistrellus nathusii</i>	2	01/09/2017	814 S
Common Pipistrelle	<i>Pipistrellus pipistrellus</i>	6	01/09/2017	814 S
Soprano Pipistrelle	<i>Pipistrellus pygmaeus</i>	4	01/09/2017	523 SE
Brown Long-eared Bat	<i>Plecotus auritus</i>	1	01/05/2017	814 S
Mammals (excl. bats)				
West European Hedgehog	<i>Erinaceus europaeus</i>	3	22/11/2022	Within study area
Reptiles				
Grass Snake	<i>Natrix helvetica</i>	1	2012	1000 E
Plants				
Good-King-Henry	<i>Chenopodium bonus-henricus</i>	4	2012	1000 E
Wall Bedstraw	<i>Galium parisiense</i>	6	03/09/2014	933 SE
Bluebell	<i>Hyacinthoides non-scripta</i>	1	2012	1000 E
Cat-mint	<i>Nepeta cataria</i>	1	2012	1000 E

Species	Scientific Name	Number of records	Date of most recent record	Distance of nearest record (m) from Site
Early Meadow-grass	<i>Poa infirma</i>	1	2012	1000 E
Large-leaved Lime	<i>Tilia platyphyllos</i>	151	08/06/2020	509 W
Invasive				
Japanese Knotweed	<i>Fallopia japonica</i>	12	26/09/2016	Within Study Area

5.3.3 There was 1 invasive plant species recorded. It should be noted that records are not completely accurate therefore the absence of invasive species should not indicate that they are currently absent from the study and survey area. However, invasive species are unlikely to impact the proposed development.

5.4 Habitat survey

5.4.1 The results of the habitat survey are presented below. The habitat types recorded on site are summarised in Table 5-5, and the frequency and distribution of habitat types is displayed within a UKHab Survey Map (Appendix A). This map illustrates the location and extent of the different habitat types recorded within the survey area at the Proposed Development Site.

5.4.2 Table 5-4 details the weather conditions at the time of the surveys.

Table 5-3: Weather conditions during survey

Parameter	Survey 1 (PEA)
Date(s)	24/08/2023
Start time and finish time	2pm to 3:30pm
Temperature (°C)	16
Cloud Cover (%)	10
Wind (Beaufort Scale)	1
Precipitation	None

5.5 Habitats

Table 5-4: Habitat Table & Condition Assessment

Habitat – UK Hab	Photograph of Habitat	Habitat Condition
Urban – Buildings u1b5 (Secondary Code: 813 – Educational Building) The college campus is dominated by the existing buildings, which comprise a mix of types and sizes ranging from single storey buildings up to 8 storeys for the central block. The majority are of brick or stone façades with glazing and flat bitumen roofs. The only exception is the southern-most block, which supports a tiled roof. The buildings were in good condition and had negligible potential for bat roosts, the building brickwork had no visible cracks, the windows were well sealed and there were no slipped tiles on the sloped roof.		N/A
Urban – Hardstanding u1b6 (Secondary Code: 32 – Scattered Trees) Hardstanding habitat extends significantly around the site, providing vehicular and pedestrian access around the site. Two courtyards are present on the wider site, although outside of the Application Site. These are located between buildings, in two distinct spaces to the northern side of the site and the southern side of the site. Outdoor furniture was present, with landscaping in the form of scattered trees and ornamental shrubs. Surrounding the perimeter of the hardstanding was ornamental shrubs (Secondary code: 847) including cherry Laurel (<i>Prunus laurocerasus</i>), Japanese jasmine (<i>Trachelospermum asiaticum</i>) and Barberry (<i>Berberis</i> sp). However, none of this landscaping falls within the Application Site. A number of scattered trees are present around the site to provide amenity landscaping for the college. Within the two courtyards were scattered trees including common lime (<i>Tilia x europaea</i>), ornamental birch (<i>Betula</i> sp) and pear (<i>Prunus</i> sp) trees. Around the northern and eastern edge of the red line boundary were scattered trees consisting of Scandinavian beam tree (<i>Scandosorbus intermedia</i>), whitebeam (<i>Sorbus aria</i>), lime (<i>Tilia</i> sp), horse chestnut (<i>Aesculus hippocastanum</i>) and common oak (<i>Quercus robur</i>). All trees had signs of management and were young to mature. The trees on site have negligible bat roosting potential due to the urban nature of the site and low connectivity. The tree however could support nesting bird, no nests were identified on site in the trees. A total of four trees on the eastern side of the site fall within the Application Site.		Hardstanding: N/A Scattered trees: Poor The trees on site satisfy up to 2 of the condition criteria for urban trees, with a number of the trees passing the native species criterion (A) and, as individual trees, they automatically pass the canopy criterion (B).

5.6 Target Notes

5.6.1 The Target Note numbers within the extended Habitat map in Appendix A correspond to the following points of ecological interest within the Site.

- TN1 – Butterfly Bush;
- TN2 – Pigeon nest.

6 Ecological Features

6.1.1 The presence of Ecological Features within the Zone of Influence of the Proposed Development, and an evaluation of their importance based on the findings of the Desk Study and habitat survey is provided below.

Table 6-1: Ecological Feature and Rationale for Presence or Absence from site

Feature	Likelihood of Occurrence	Rationale
Designated Sites		
Statutory Designated Sites	Absent (within site) Present (within study area)	The study area includes a number of statutory designated sites, including the Lee Valley SPA and Ramsar, Walthamstow Reservoirs SSSI and Railway Fields LNR. However, the designated sites are not considered to be in the area of influence, with the development type not covered in the SSSI Impact Risk Zone development types for Walthamstow Reservoirs and considering the highly urbanised context of the wider environment. Epping Forest SAC is vulnerable to impacts from development extending to 6.2 km, however this is associated with recreational disturbance from residential developments. Therefore, as the redevelopment is not residential, impacts upon the site are unlikely and the site falls outside of the zone of influence of the development.
Non-Statutory Designated Sites	Absent (within site) Present (within study area)	There are 8 Sites of Importance for Nature Conservation (SINCs) within 1 km of the site. The nearest is Tottenham Railside, which is c 700 meters to the south of the site. Given the scale of the Proposed Development, and the lack of likely impacts beyond the Site boundary (in line with a Construction Environmental Management Plan), nearby non-statutory designated sites are sufficiently well separated so that no impacts on their designated features are anticipated because of the works.
Priority Habitats		
Deciduous Woodland	Absent (within site) Present (within study area)	The nearest priority habitat is Tottenham Green 10 meters north-east of the site. There is limited ecological connectivity between the site and priority habitats within the search area; it is considered that nearby priority habitats are sufficiently well separated so that no impacts are expected as a result of the Proposed Development.
On-Site Habitats		
Buildings and Hardstanding	Present (within site)	The habitats present within the site are largely dominated by artificial habitats comprising buildings and hardstanding, with no green infrastructure present on these. As a result, these habitats are considered to be of negligible ecological value, representing habitats that are common in the urban environment. Ornamental landscaping was present in some places, although not within the Application Site, however these fell below the Minimum Mapping Unit for the assessment and were, as a result, included as a secondary code.

Feature	Likelihood of Occurrence	Rationale
Scattered Trees	Present (within site)	Scattered trees were present within the site, providing amenity planting within courtyard areas and around the periphery of the site. Urban trees provide a notable feature in the urban environment, often comprising the main habitat type present and thus notably enrich the biodiversity value of a site. As a result, the habitat is considered to be of biodiversity value at the local scale. A total of four of the trees identified in the site fall within the Application Site, with the biodiversity value remaining of local biodiversity value.
Invertebrates		
Invertebrates	Likely absent	Given the urban nature of the Site, and lack of connectivity to suitable habitat, it is not considered that there is any risk of harm to support diverse assemblages of invertebrate species.
Mammals		
Bats - roosting	Likely absent	Given the lack of suitable habitat within the Site and the highly urban context of the location, it is unlikely that the Site supports foraging or commuting bats.
Bats – foraging / commuting	Likely absent	Given the lack of suitable habitat within the Site and the highly urban context of the location, it is unlikely that the Site supports foraging or commuting bats.
Hedgehogs	Likely absent	Three records of hedgehog were noted in the desk study. Although the Site does not contain habitat suitable for hedgehogs they may pass through the Site whilst foraging. Red fox (<i>Vulpes vulpes</i>) may also commute through the Site.
Birds		
Nesting Birds (Non-Schedule 1)	Low	The habitats could support local assemblages of birds which might use the buildings to nest within. An active feral pigeon nest was identified on the site as well as occasional signs of previous roosting locations.
Nesting Birds (Schedule 1)	Likely absent	Some instances of Schedule 1 birds were recorded during the desk study. However, the Site offers limited suitable habitat for nesting Schedule 1 birds on-Site.
Plants - Invasive		
LISI Species: Butterfly bush Cherry Laurel	Present	Large buddleia plants are present in a number of the outdoor areas of the site and cherry laurel is also present within the landscaping of the site. Although these species are not listed on Schedule 9 of the Wildlife and Countryside Act 1981, they are species of local concern as identified by the London's Invasive Species Initiative (LISI).

6.1.2 Based on the findings of the PEA, the following features of ecological importance were either (a) assessed as likely to be absent from the Site, (b) have Negligible nature conservation value; or (c) are not within the Zone of Influence of the Proposed Development.

6.1.3 The following Potential Ecological Features of the Site are therefore not considered further:

- Statutory and Non-Statutory Designated Sites;
- Priority Habitats;
- On-site Habitats
- Invertebrates;
- Bats-roosting
- Bats-foraging/commuting
- Hedgehogs; and,
- Nesting birds (Schedule 1).

6.1.4 The Potential Ecological Features of the Site that warrant consideration for potential impact for mitigation or compensation are as follows:

- Nesting Birds (Non-Schedule 1); and,
- Plants Invasive

7 Potential Impacts

7.1.1 The following section considers the likely impact of the proposals on designated sites, habitats and protected or notable species. This is based on those species for which potentially suitable habitat occurs within or adjacent to the Proposed Development Site. Please refer to Table 3-2 for the definitions of the scale of constraints.

7.2 Scattered Trees

7.2.1 The site wide Masterplan has the potential for adverse impacts on the scattered trees present. Whilst no trees are proposed to be removed as part of the proposed new Construction and Engineering centre, the completion of construction activities and encroachment of works onto the habitat have potential to cause damage to the trees that could impact on their long-term health. The potential impacts on scattered trees is considered to comprise a low constraint and requires mitigation to ensure impacts are avoided.

7.3 Nesting birds

7.3.1 A pigeon nest was identified on site (TN 2). Accumulated droppings suggested some roosts may have existed on-site, but none were identified during the survey. Removal of vegetation and building development in the nesting bird season could impact active nests, and irrespective of the species present could comprise a legal offence. Flat roofs provide nesting features and ledges identified on-site support nesting for local bird species.

7.3.2 In addition to the risk associated with nesting pigeon on the building, scattered trees surrounding the site have potential to support nesting birds, and impacts on the tree as a result of removal or an encroachment of works could comprise a legal offence.

7.3.3 Despite 3 Schedule 1 birds being present in the desk study, the Site offers limited suitable habitat for nesting as per the following:

- Redwing was found to be present on the desk study however nests for red wings are found in dense grass like vegetation or in wetland both of which are not found on site.
- Fieldfare nest in woodlands, hedgerows or a pile of logs with none of these habitats present on site.
- Red kite nest in trees 12-20m about the ground typically in rural areas which habitats on site do not support.

7.3.4 The potential for impacts on breeding birds is considered to comprise a low constraint, and requires mitigation to ensure the impacts are avoided and works are legally compliant.

7.4 Plants

- 7.4.1 None of the habitats recorded during the extended Phase 1 habitat survey are of high botanical or habitat value and no native plant species of national importance were present.
- 7.4.2 Japanese knotweed was recorded on the desk study within 1km of the site, however, no evidence of Japanese knotweed was found on site.
- 7.4.3 Butterfly bush and cherry laurel were both present on the site. These species have the potential to spread invasively within the urban environment and out-compete native plant species. The potential for impacts is considered to comprise a low constraint, and requires mitigation to ensure impacts are avoided.

8 Compensation, Mitigation & Recommendations

8.1 Scattered Trees

- 8.1.1 Tree protection measures in line with BS 5837 – Trees in relation to Design, Demolition and Construction¹¹ should be installed prior to the commencement of works on the site in line with arboricultural recommendations. The tree protection measures should include the establishment of a Root Protection Area (RPA), appropriate to the tree size and in line with arboricultural recommendations, which will provide protection to tree roots from sustained machinery movements that can compact the ground and cause irreversible damage. The RPA will also afford some protection to the tree trunk and canopy, although it may be advisable to extend the RPA to the edge of the canopy in some cases.
- 8.1.2 If incursion into an RPA is necessary, an arborist should review the proposals to consider the effects of incursion into the RPA and review the tree following works to ensure trees are not significantly affected. Furthermore, any damage to trees on-site should be inspected by an arborist to ensure the health and safety of the tree is not impacted, with any remedial measures recommended to be carried out.

8.2 Nesting birds

- 8.2.1 All birds, their active nests and eggs are protected from harm under the WCA. This legislation makes it an offence to kill, injure or take any wild bird or to take, damage or destroy the nest of any wild bird while that nest is in use or being built. An offence could therefore occur during clearance and refurbishment work on the Site.
- 8.2.2 The buildings and vegetation support nesting birds. To ensure legal compliance, clearance of habitat suitable for nesting birds (all vegetation and buildings) should be undertaken outside the nesting bird season (i.e. between October and February inclusive). However, should this not be practical, the following measures must be adhered to:

¹¹ British Standards Institute (2012) British Standard 5837 – Trees in relation to Design, Demolition and Construction. BSI, London.

- Works must be undertaken in line with a Precautionary Working Method Statement (PWMS);
- Prior to clearance, an ecologist should carry out a nesting bird inspection of areas to be cleared;
- Should any active birds' nests be found, the work may not take place within an appropriate established buffer zone (usually 5m), which should be left intact until it has been confirmed that the young have fledged, and the nest(s) is no longer in use.

8.3 Wild mammals

- 8.3.1 All wild mammals, including red fox, are protected by the Wild Mammals (Protection) Act 1996 which makes it an offence to intentionally cause any wild mammal unnecessary suffering by certain methods. Common wild mammals, such as red fox, may venture onto the site during the refurbishment and construction of the Proposed Development.
- 8.3.2 To avoid an offence, measures should be employed during the construction phase, including the covering of all deep holes and trenches overnight and/or the provision of planked escape routes for any wildlife that may fall in. In addition, any liquids held on-site should be stored in a secure lock-up. These measures should be implemented through a Demolition and Construction Method Statement (DCMS) or similar. Hoarding around the perimeter of the Site should also minimise the likelihood of any wild mammals gaining access to the site.
- 8.3.3 If mammal holes are found during the works, it is advised that proposed works do not interfere with existing mammal holes found on site.

8.4 Invasive Species

- 8.4.1 None of the habitats recorded during the extended UK Habitat Classification survey habitat survey are of high botanical or habitat value and no native plant species of national importance were present.
- 8.4.2 Butterfly-bush and cherry laurel were found to be present throughout the outdoor sections of the site. Although, there is no legal requirement to remove or control the spread of species listed in the LISI, it is recommended to remove and dispose any arisings prior to works commencing. Additionally, the planting of native species in its place will enhance the ecology of the area.

9 Enhancements

- 9.1.1 Planning policy at the national and local level and strategic biodiversity partnerships encourage inclusion of ecological enhancements in development projects. Ecological enhancements can also contribute to green infrastructure and ecosystem services such as storm water attenuation and reducing the urban heat island effect. The following measures would be suitable for integration into the Proposed Development site's design.

9.2 Native tree and scrub planting

- 9.2.1 The Council's Tree Strategy¹² aims to ensure trees within the borough are managed in a pro-active and systematic manner. It is recommended that native trees and scrub species are included within any landscaping to enhance the site.
- 9.2.2 There are few opportunities for additional tree planting in the context of the proposed Construction and Engineering Centre, but opportunities will be available in the future in the context of the campus Masterplan, particularly with the opening up of the courtyards. It is recommended wildlife planting should be integral to the soft landscape plans and should include native species or climate resilient species of recognised wildlife value. The use of nectar-rich and berry producing plants will attract a wider range of insects, birds and mammals and continue to accommodate those already utilising the site. Where possible, larger shrubs should be under-planted to create greater structure and cover for wildlife. The use of block planting of single species should be avoided in favour of a higher diversity of plant types per square metre.

9.3 Good horticultural practice

- 9.3.1 Good horticultural practice should be utilised, including the use of peat-free composts, mulches and soil conditioners, native plants with local provenance and avoidance of the use of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

9.4 Installation of Green Roofs

- 9.4.1 The London Plan and Haringey's Local Plan encourages the inclusion of green infrastructure, including green walls and green roofs, within development designs to provide biodiversity enhancements within the urban environment. In urban areas the provision of green roof habitats comprises one of the principal means of providing urban green infrastructure, with the pressure on land for development often requiring projects to maximise floorspace area. It is recommended that green roofs containing native planting are considered within the design, as these will provide a range of ecosystem benefits to the area and additional benefits to the school. Green roofs bring a range of benefits to development projects, including the enhancement of biodiversity, temperature regulation, mitigation of the urban heat island effect, interception of runoff and removal of pollutants from both the air and rainwater. There are two different types of green roof, with the different types largely differentiated by the roof build-up and subsequent species that can be accommodated.
- 9.4.2 To maximise biodiversity, proposals should comprise native planting of a range of native grasses and flowering plants which will contribute to the Haringey Biodiversity Action Plan 2009 which "*aims to conserve, enrich and improve biodiversity value and celebrate the wildlife in Haringey*". This would provide habitat for birds and invertebrates and would represent a valuable ecological enhancement. This should ideally only be accessible for maintenance purposes, to minimise disturbance to wildlife. If the roof terraces are to be open to the public, it is recommended that the intensive planting is kept off walking routes to avoid disturbance.

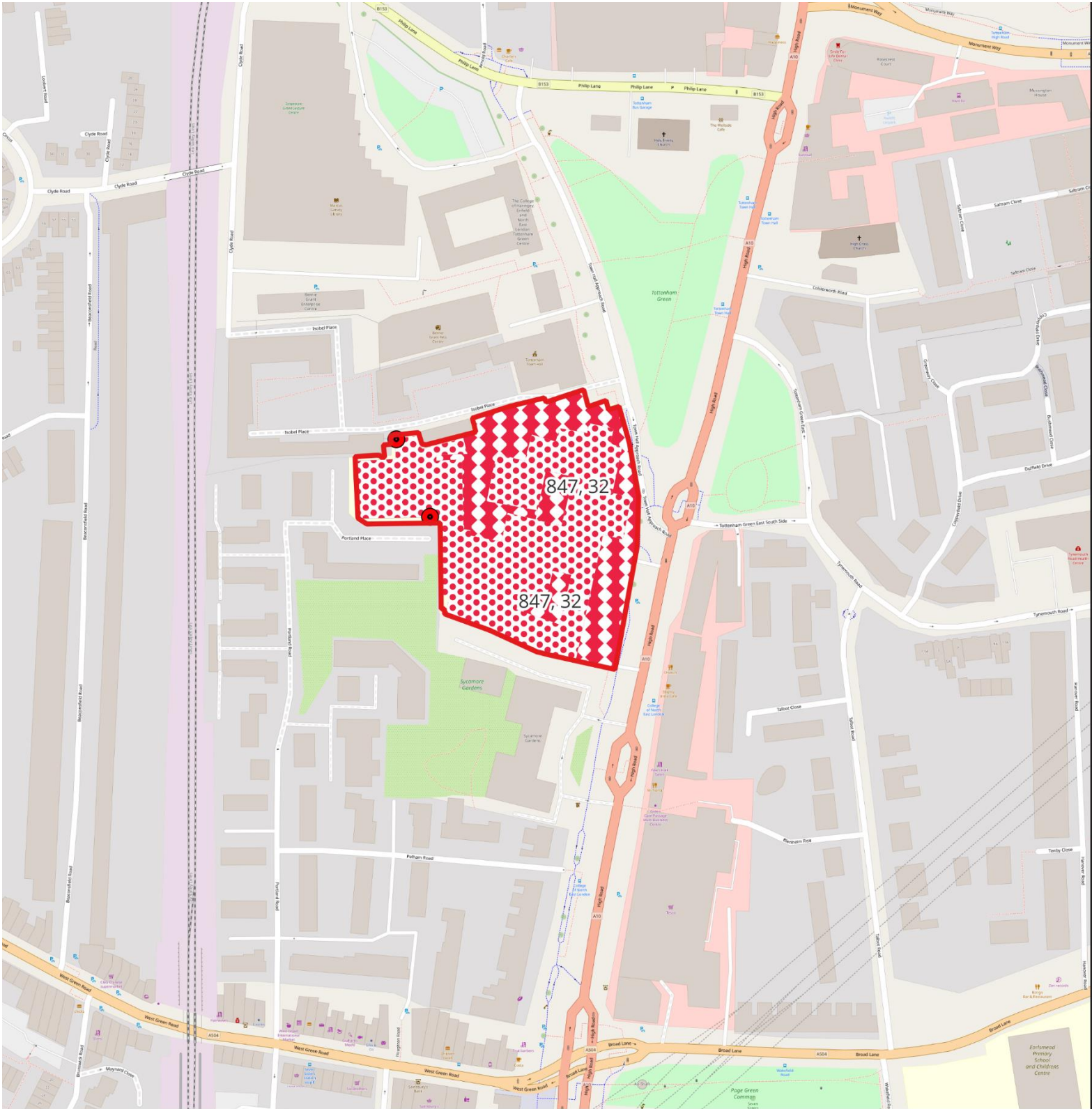
¹² Haringey Council (2008) London Borough of Haringey Tree Strategy 2008 – 2011.

9.5 Provision of wildlife boxes

- 9.5.1 Implementing wildlife boxes on the site would contribute to the Council's Greenest Borough Strategy 2008-2018 'Going Green'¹³.
- 9.5.2 Bird boxes could be installed within the tree planting on the ground and on the roof amongst the intense green roof terraces. Swift boxes would be advised for the intense green roof terraces as swifts can fly up to 10,000 feet.
- 9.5.3 Insect houses can be installed on the intense green roof terraces.
- 9.5.4 Bird boxes should be installed on the refurbished buildings, to provide roosting habitat for bats and nesting habitat for birds, respectively. These could be installed onto or within the walls or on the roof of the buildings.
- 9.5.5 Bird boxes should be installed with different sized holes (including both 32mm and 26mm diameter) to cater for different species, including notable species that could occur on the site. This should include nest boxes for house sparrow on the proposed buildings, such as the Schwegler 1SP Sparrow Terrace. A further suggestion is the Schwegler No 24 Brick Box and Schwegler 1B Bird Box, including both 32mm and 26mm diameter holes. These boxes should also be located adjacent to any landscaped areas, at least 3m above the ground and facing southeast to north, to avoid direct sunlight and the heaviest rain.

¹³Haringey Strategic Partnership (2008) Going Green. Haringey's Greenest Borough Strategy 2008-2018.

Appendix A
Habitat Survey Map



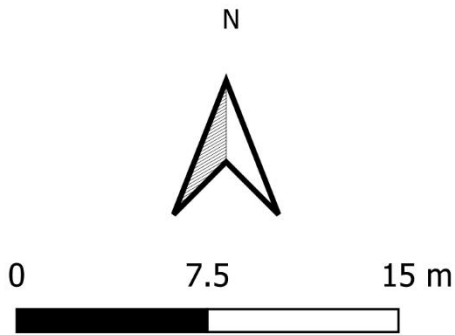
- Red Line Boundary

Target Note

Uk Habs

u1b5 - buildings

u1b6 - other developed land



Client	Peter Marsh Consulting Ltd
Project	CCCG Collage of Harigey
Title	Uk Habitat
Reference	Figure4
Drawn	PA
Date	06/09/2023

Appendix B Relevant Legislation

B.1 The Environment Act 2021

- B.1.1 The focus of the Act is the “...provision for targets, plans and policies for improving the natural environment...” and its requirements are structured around a number of broad themes (noting this is not a comprehensive summary of the provisions):
- B.1.2 Nature and biodiversity – Part 6 of the Act importantly makes provision for “biodiversity gain in planning” which will apply to applications under the Town & Countryside Act and the Planning Act. In addition, the responsibilities on Government or public bodies have changed, including through:
- strengthening the existing biodiversity duty;
 - requiring biodiversity reports;
 - setting up local nature recovery strategy areas;
 - providing for national habitat mapping; and
 - establishing species conservation and protect Site strategies.
- B.1.3 Section 98 and 99 introduce biodiversity gain requirements that make changes to the Town & Country Planning Act and The Planning Act. The commencement of these changes and whether secondary legislation will be required to enact them will have to be subject to legal interpretation and advice.
- B.1.4 Conservation covenants– Part 7 of the Act makes provisions for conservation covenants which essentially support the “biodiversity gain in planning” concept by providing a mechanism through which any gains can be secured and managed. These come into force at the point that the Secretary of State “by regulations appoints”.

B.2 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – the 2019 Regulations

- B.2.1 The Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales. The Regulations provide for the designation and protection of 'European Sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites.
- B.2.2 Under the Regulations, competent authorities i.e., government departments and public bodies, have a general duty to have regard to the EC Habitats Directive and Wild Birds Directive. The Regulations place a duty on the Secretary of State to propose a list of Sites which are important for either habitats or species (listed in Annexes I and II of the Habitats Directive respectively) to the European Commission. The Regulations also require the compilation and maintenance of a register of European Sites, to include SACs and Special Protection Areas (SPAs) classified under Council Directive 79/409/EEC on the Conservation of Wild Birds (the Birds Directive). These Sites form a network termed Natura 2000. The Regulations enable the country agencies to enter into management agreements on

land within or adjacent to a European Site, in order to secure its conservation. The Regulations also provide for the control of potentially damaging operations, whereby consent from the country agency may only be granted once it has been shown through appropriate assessment that the proposed operation will not adversely affect the integrity of the Site. When considering potentially damaging operations, the precautionary principle applies i.e. consent cannot be given unless it is ascertained that there will be no adverse effect on the integrity of the Site.

- B.2.3 The Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2, or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 4. However, these actions can be made lawful through the granting of licenses by the appropriate authorities. Licenses may be granted for a few purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority is satisfied that there are no satisfactory alternatives and that such actions will have no detrimental effect on wild population of the species concerned.

B.3 The Wildlife and Countryside Act (WCA) 1981 (as amended)

- B.3.1 The WCA, as amended, consolidates and amends pre-existing national wildlife legislation in order to implement the Bern Convention and the Birds Directive. It complements the Habitat Regulations 2010 (as amended), offering protection to a wider range of species. The Act also provides for the designation and protection of national conservation Sites of value for their floral, faunal or geological features, termed Sites of Special Scientific Interest (SSSIs).
- B.3.2 Schedules of the act provide lists of protected species, both flora and fauna, and detail the possible offences that apply to these species. All relevant species-specific legislation is detailed later in this Appendix.
- B.3.3 Schedule 1 – Part 1 relates to birds and their young, for which it is an offence to intentionally or recklessly disturb at, on or near an ‘active’ nest. Schedule 1 – Part 2 relates to birds afforded special protection during the close season which is 1 February to 31 August (21 February to 31 August below high-water mark), but which may be killed or taken outside this period.

B.4 The Countryside and Rights of Way (CROW) Act 2000

- B.4.1 The CROW Act, introduced in England and Wales in 2000, amends and strengthens existing wildlife.
- B.4.2 Legislation detailed in the WCA places a duty on government departments and the National Assembly for Wales to have regard for biodiversity and provides increased powers for the protection and maintenance of SSSIs. The Act also contains lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.

B.5 The Natural Environment and Rural Communities (NERC) Act 2006

- B.5.1 Section 40 of the NERC Act places a duty upon all local authorities and public bodies in England and Wales to promote and enhance biodiversity in all their functions. Sections 41 (England) and 42 (Wales) list habitats and species of principal importance to the conservation of biodiversity. These lists superseded Section 74 of the CROW Act 2000.

B.6 UK Biodiversity Action Plan (replaced by the UK Post-2010 Biodiversity Framework)

- B.6.1 The United Kingdom Biodiversity Action Plan (UK BAP), first published in 1994 and updated in 2007, was a government initiative designed to implement the requirements of the Convention of Biological Diversity to conserve and enhance species and habitats. The UK BAP contained a list of priority habitats and species of conservation concern in the UK and outlined biodiversity initiatives designed to enhance their conservation status. Lists of Broad and Local habitats were also included. The priority habitats and species correlated with those listed on Section 41 and 42 of the NERC Act.
- B.6.2 The UK BAP required that conservation of biodiversity be addressed at a County level through the production of Local BAPs. These were complementary to the UK BAP, however, were targeted towards species of conservation concern characteristic of each area. In addition, several local authorities and large organisations have produced their own BAPs.

B.7 Species and Habitats of Material Consideration for Planning in England – UK Post 2010 Biodiversity Framework

- B.7.1 In 2011, the government published the 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' to replace the previous England Biodiversity Strategy. In 2012 the UK BAP was replaced by the UK Post-2010 Biodiversity Framework.
- B.7.2 Previous planning policy (and some supporting guidance which is still current, e.g., ODPM Circular 06/2005, now under revision), refers to UK BAP habitats and species as being a material consideration in the planning process. Equally many local plans refer to BAP priority habitats and species. Both remain as material considerations in the planning process, but such habitats and species are now described as Species and Habitats of Principal Importance for Conservation in England, or simply priority habitats and priority species under the UK Post-2010 Biodiversity Framework. The list of habitats and species remains unchanged and is still derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006. As was previously the case when it was a BAP priority species hen harrier continues to be regarded as a priority species although it does not appear on the Section 41 list.
- B.7.3 The 'UK Post-2010 Biodiversity Framework', published in July 2012 succeeds the UK BAP and 'Conserving Biodiversity – the UK Approach'. The framework was produced by JNCC and Defra to set a broad enabling structure for action across the UK. Its purpose was to:
- Set out a shared vision and priorities for UK-scale activities, in a framework jointly owned by the four countries, and to which their own strategies will contribute.
 - Identify priority work at a UK level which will be needed to help deliver the Aichi Targets and the EU Biodiversity Strategy.
 - Facilitate the aggregation and collation of information on activity and outcomes across all countries of the UK, where the four countries agree this will bring benefits compared to individual country work.
 - Streamline governance arrangements for UK-scale activity.

B.8 Natural Environment White Paper – ‘The Natural Choice: securing the value of nature’ 2011

- B.8.1 The principal aims of Natural Environment White Paper, published in June 2011, are to preserve and improve the natural environment, and build a connection between people and nature as well as introducing policies that will help ‘move progressively from net biodiversity loss to net gain’ through reforms such as ‘biodiversity offsets’.
- B.8.2 The ‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’ strategy builds on this, offering a more comprehensive approach to stop biodiversity loss such as emphasis on preserving and maintaining important habitats, priority habitats and connections between areas with special status such as SSSIs.

B.9 Birds of Conservation Concern 5: the Red List for Birds

- B.9.1 The latest review of Birds of Conservation Concern 5: the Red List for Birds was published in December 2021.
- B.9.2 Commonly referred to as the UK Red List for birds, this is the fifth review of the status of birds in the UK, Channel Islands and Isle of Man, and updates the last assessment in 2015. Using standardised criteria, 245 species with breeding, passage or wintering populations in the UK were assessed by experts from a range of bird NGOs and assigned to the Red, Amber or Green lists of conservation concern.

B.10 Invasive Species (Enforcement and Permitting) Order 2019

- B.10.1 This Order allows for the enforcement of Regulation (EU) No. 1143/2014 on the prevention and management of the introduction and spread of invasive alien species in England and Wales, including the relevant licences, permits and rules for keeping invasive alien species.
- B.10.2 An enforcement regime is introduced, including criminal offences, licencing, and permitting provisions for Regulation (EU) No. 1143/2014 on the prevention and management of the introduction and spread of invasive alien species (“The IAS Regulation”).
- B.10.3 The IAS Regulation lists species of concern which cannot be imported, kept, bred / grown, transported, sold, used, allowed to reproduce, or released into the environment. There are currently 49 species listed, which can be found in the Annex of Regulation (EU) No. 2016/1141 adopting a list of invasive alien species of Union concern pursuant to Regulation (EU) No 1143/2014. The regulator is Natural England for England, offshore marine areas, and in relation to imports and exports.

B.11 The Countryside and Rights of Way (CROW) Act 2000

- B.11.1 V The CROW Act, introduced in England and Wales in 2000, amends and strengthens existing wildlife.
- B.11.2 Legislation detailed in the WCA places a duty on government departments and the National Assembly for Wales to have regard for biodiversity and provides increased powers for the protection and maintenance of SSSIs. The Act also contains lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.

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B.14 Species and Habitats of Material Consideration for Planning in England – UK Post 2010 Biodiversity Framework

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- B.14.2 Previous planning policy (and some supporting guidance which is still current, e.g., ODPM Circular 06/2005, now under revision), refers to UK BAP habitats and species as being a material consideration in the planning process. Equally many local plans refer to BAP priority habitats and species. Both remain as material considerations in the planning process, but such habitats and species are now described as Species and Habitats of Principal Importance for Conservation in England, or simply priority habitats and priority species under the UK Post-2010 Biodiversity Framework. The list of habitats and species remains unchanged and is still derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006. As was previously the case when it was a BAP priority species hen harrier continues to be regarded as a priority species although it does not appear on the Section 41 list.
- B.14.3 The 'UK Post-2010 Biodiversity Framework', published in July 2012 succeeds the UK BAP and 'Conserving Biodiversity – the UK Approach'. The framework was produced by JNCC and Defra to set a broad enabling structure for action across the UK. Its purpose was to:

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- owned by the four countries, and to which their own strategies will contribute.
- Identify priority work at a UK level which will be needed to help deliver the Aichi Targets and the EU Biodiversity Strategy.
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B.15 Natural Environment White Paper – ‘The Natural Choice: securing the value of nature’ 2011

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- B.15.2 The ‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’ strategy builds on this, offering a more comprehensive approach to stop biodiversity loss such as emphasis on preserving and maintaining important habitats, priority habitats and connections between areas with special status such as SSSIs.

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B.17 Protection of Badgers Act 1992

- B.17.1 Under the Protection of Badgers Act 1992, it is an offence to disturb a badger in its sett or damage, destroy or obstruct access to a badger sett. If the proposed work will involve works coming within 30 m of an active badger sett Natural England’s standing advice will need to be consulted and a mitigation plan drawn up. After which a licence will need to be applied for from Natural England to undertake any works. It should be noted that badgers cannot be captured and moved purely for development purposes.

B.18 Invasive Species (Enforcement and Permitting) Order 2019

- B.18.1 This Order allows for the enforcement of Regulation (EU) No. 1143/2014 on the prevention and management of the introduction and spread of invasive alien species in England and Wales, including the relevant licences, permits and rules for keeping invasive alien species.

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- B.18.3 The IAS Regulation lists species of concern which cannot be imported, kept, bred / grown, transported, sold, used, allowed to reproduce, or released into the environment. There are currently 49 species listed, which can be found in the Annex of Regulation (EU) No. 2016/1141 adopting a list of invasive alien species of Union concern pursuant to Regulation (EU) No 1143/2014. The regulator is Natural England for England, offshore marine areas, and in relation to imports and exports.

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