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Manor Road, Richmond

Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment

Report Number: 11778_R01d_CC_MM

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Summary

S.1. This report has been prepared by Tyler Grange LLP on behalf of Avanton Richmond Development Ltd. It sets out the findings of a Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) at a retail park known as Homebase North Sheen, located along Manor Road, Richmond, London, Middlesex (OS Grid Reference TG 18904 75434), hereinafter referred to as the 'site'. The purpose of this report is to inform a planning application for the construction of 385 new residential units, 480sqm of flexible retail/community/office use, and above ground parking.

S.2. The site is an active retail park, predominantly comprised of hardstanding with a central building actively used by members of the public and Homebase staff. The site is accessible directly from Manor Road. The site contains serval young to semi-mature trees, along with small areas of amenity grassland, introduced shrub, scattered scrub and tall ruderal vegetation. The site is bordered by active railway lines to the west and south, a bus park to the north and a road; Manor Road to the east.

S.3. The site is not covered by nor adjacent to any sites that are subject of statutory or non-statutory protection and no such sites are likely to be affected by the proposed development on the site. The majority of habitats within the site that may be lost as a result of a development (Buildings, hardstanding, amenity grassland and introduced shrub) are of negligible ecological importance and no specific mitigation is required.

S.4. The building and trees within the site have been assessed as having negligible potential to support roosting bats.

S.5. Precautionary checks for nesting breeding birds, reptiles and hedgehogs are recommended by an Ecological Clerk of Works (ECoW), if buildings or nesting bird habitat is removed in the nesting bird season (March – August, inclusive), Hedgehog hibernation season (October – April, inclusive), to prevent death or injury of individual by the proposed works. Should nesting birds be present with young or eggs, an appropriate buffer should be erected, and the nest checked periodically by an ECoW until it is clear the young have either failed or fledged. Should any hedgehogs or reptiles be found they will be removed by an ECoW by hand and translocated to suitable off or onsite habitat that is suitable and similar to that in which they were found.

S.6. Existing habitats should be retained and enhanced where possible, and new habitat created on-site in line with local planning policy and the borough of Richmond Upon Thames Biodiversity Action Plan (BAP). New flora planted should be native and of local stock. In addition, enhancements for specific species groups will be provided post-construction including bird and bat boxes to increase the number of nest and nesting sites across the site and hedgehog boxes and highways and bug hotels to provide a net biodiversity gain.

Section 1: Introduction, Context and Purpose

Introduction

1.1. This report has been prepared by Tyler Grange LLP on behalf of Avanton Richmond Development Ltd. It sets out the findings of a Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) of a retail space at 86 Manor Road, Richmond, London (OS Grid Reference TG 18904 75434), hereinafter referred to as the 'site'.

1.2. This report has been produced to support a planning application for the redevelopment of the site. The proposed development will involve the demolition of existing buildings and structures and the comprehensive residential-led redevelopment of four buildings of between four and nine storeys to provide residential units (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.

Purpose

1.3. This report:

- Is to be submitted in order to support a planning application for the site;
- Uses available background data and results of field surveys, to describe and evaluate the ecological features present within the likely 'zone of influence' (ZoI)[1] of the proposed development;
- Describes the actual or potential ecological issues and opportunities that might arise as a result of the site's future development for; and
- Where appropriate, makes recommendations for mitigation of adverse effects and ecological enhancement, to ensure conformity with policy and legislation listed in **Appendix 1**;

1.4. This assessment and the terminology used are consistent with the 'Guidelines for Ecological Impact Assessment in the UK and Ireland' (CIEEM, 2018).

[1] Defined as the area over which ecological features may be subject to significant effects as a result of activities associated with a project (CIEEM, 2018)

Section 2: Methodology

Data Search

2.1. The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.

2.2. The data search has been undertaken for a 10km radius around the site for European statutory sites, a 2km radius for national statutory and non-statutory sites and a 1km radius for protected and priority species[2] records. The search area was extended to 2km for bat records.

2.3. GiGL; Greenspace Information for Greater London Environmental Records Centre was contacted for details of protected and priority species and non-statutory sites. The information from GiGl was requested on 15th August 2018 and returned on 16th August 2018. Where relevant records were identified, the information provided has been incorporated into the report with due acknowledgement.

2.4. The Multi-Agency Geographic Information for the Countryside[3] website was accessed for information on the location of statutory designated nature conservation sites within a 2km radius the site.

2.5. The London Borough of Richmond upon Thames website was consulted for details of relevant local planning policies and supplementary planning guidance.

2.6. The London Borough of Richmond upon Thames BAP (LBAP) was consulted for priority habitats and species subject to conservation action, to assist with the evaluation of ecological features and to inform site enhancement strategies.

Extended Phase I Habitat Survey

2.7. An 'extended' Phase I habitat survey was undertaken on 8th August 2018 by Sarah Richardson, an experienced field ecologist and graduate member of the Chartered Institute of Ecology and Environmental Management (CIEEM). The technique was based upon Phase I survey methodology (JNCC, 2010). This 'extended' Phase I technique provides an inventory of the habitat types present and dominant species. The weather conditions for the survey were dry with 75% cloud cover, 24°C degrees and 2 on the Beaufort scale.

2.8. A second phase 1 habitat survey was undertaken on 14th January 2019 by Christian Cairns MSc a student member of CIEEM. This was undertaken in order to survey an extension to the original site boundary to the north to encompass the bus park. The weather conditions for the survey were sunny, cold and try, with 25% cloud cover and 6°C degrees and 2 on the Beaufort scale.

2.9. Using the above method, the site was classified into areas of similar botanical community types with a representative sample of those species present at the time of the survey being described.

[2] UK priority species and habitats are those subject to conservation action and referred to as Species of Principal Importance (SoPIs) or Habitats of Principal Importance (HoPIs). They are listed at Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act states that local planning authorities must have regard for the conservation of both SoPIs and HoPIs.

[3] https://magic.defra.gov.uk/MagicMap.aspx

Additionally, incidental records of fauna were also made during the survey and the habitats identified were evaluated for their potential to support legally protected and priority species.

Preliminary Bat Roost Assessment – Buildings & Trees

2.10. A preliminary assessment of the buildings and trees present within the site was undertaken to assess their potential to support roosting bats. This survey was undertaken alongside the 'extended' Phase 1 habitat survey. The surveys followed standard methodologies (Mitchell-Jones, A.J., 2004; Mitchell-Jones, A.J. and McLeish, A.P., 2004; Collins, 2016) which are described below.

2.11. The PBRA for buildings comprised an external and internal inspection of all buildings present on-site to assess their potential to support roosting bats. In summary, this required the following:

- A visual inspection of the exterior and interior of the buildings on site was undertaken on the 8th August 2018, examining features such as brickwork, lead flashing, and tiles for evidence of use by bats, including the presence of bat droppings and staining from fur-oil or urine; and
- A number of factors were considered including the presence of features suitable for use by crevice dwelling bats, proximity to foraging habitats or cover, and potential for disturbance from lighting and other sources.

2.12. The PBRA for trees comprised a ground level inspection of all trees present on-site to determine the potential of each tree to support roosting bats. During this survey, Potential Roost Features (PRFs) that may be used by bats, as identified within the BCT Good Practice Guidelines (Collins, 2016), were sought. These included the following:

- Woodpecker holes, rot holes, knot holes arising from naturally shed branches and man-made holes;
- Hazard beams and other vertical or horizontal cracks and splits (such as frost-cracks) in stems or branches;
- Partially detached platey bark;
- Cankers;
- Other hollows or cavities, including butt-rots;
- Partially detached ivy with stem diameters in excess of 50mm; and
- Bird, bat or dormouse boxes.

2.13. Evidence of the presence of bat roosts was also sought. These signs include:

- Bat droppings in, around or below a PRF;
- Odour emanating from a PRF;
- Audible squeaking at dusk or in warm weather; and
- Visible staining below a PRF.

2.14. The potential of each building or tree at the site and immediately adjacent to the site to support roosting bats has been categorised against the criteria described in Table 2.1.

Suitability	Description of Roosting Habitats
Negligible	Negligible habitat features on-site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection conditions and surrounding habitat.

Table 2.1 – Roost Assessment Criteria (adapted from Collins 2016).

Evaluation

2.15. The evaluation of habitats and species is defined in accordance with published guidance (CIEEM, 2018). The level of importance of specific ecological features is assigned using a geographic frame of reference, with international being most important, then national, regional, county, borough, local and lastly, within the site boundary only.

2.16. Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. 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.

Quality Control

2.17. All ecologists at Tyler Grange LLP are members of CIEEM and abide by the Institute's Code of Professional Conduct.

Section 3: Ecological Features and Evaluation

Context

3.1. The site is an active retail site, comprised of a central building surrounded by hardstanding actively used by staff and members of the public. The site is accessible directly from Manor Road; B353 and contains serval trees and areas of marginal vegetation, hedgerows, amenity grassland and introduced shrub.

Figure 3.1. Aerial photography showing site boundary and surrounding landscape

3.2. The site is bordered by railway lines on the south and west boundary; Manor Road (the B353) on the east boundary and north boundary.

Protected Sites

Statutory Sites

3.3. There are two sites protected under the Conservation of Habitats and Species Regulations 2017 within 10km of the site:

- Richmond Park is located 1.1km south of the site and is designated as a Special Conservation Area (SAC), National Nature Reserve (NNR) and Site of Special Scientific Interest (SSSI). Richmond Park is 846.68Ha in size and is designated for supporting a population of an Annex II species: stag beetle *Lucanus cervus*. Given that the site is designated as a SAC, it is considered to be of **international importance**.

- Wimbledon Common is located 4.2km south-east of the site and is designated as a SAC and SSSI. Wimbledon Common is 350Ha in size and is designated for Annex I Habitats; Northern Atlantic heaths and European heaths and supporting a population of stag beetles *Lucanus cervu,* which is listed as an Annex II species. Given that the site is designated as a SAC, it is considered to be of **international importance**.

3.4. There are two statutory protected sites within 2km of the site:

- Svon Park is located 1.7km north-west of the site and is designated a SSSI. Svon Park is 21.5ha in size and is designated for its tall wet grassland, tall grass washland, semi-improved grassland and wet woodland. Additionally, the site is known to support populations of nationally and locally scarce invertebrate species. Given that this site is designated a SSSI it is considered to be of **national importance**.

- Isleworth Ait is located 2km west of the site and is designated as a Local Nature Reserve (LNR). Isleworth Ait is 3.48 Ha in size and is designated for. This site is considered to be of **local importance**.

3.5. The site does fall within the SSSI Impact Risk Zones (IRZs) of several SSSI's located within and beyond the 2km radius.

LNRs are notified under Section 21 of the National Parks and Access to the Countryside Act 1949 by local authorities. They are not necessarily of great ecological importance and are intended for public appreciation and enjoyment of wildlife. The LNR designation does not afford special protection, although LNRs are protected under legislation and planning policy.

Non-Statutory (Local) Sites

3.6. Non-statutory sites are known as Sites of Importance for Nature Conservation (SINCs). SINC's are recognised by the Greater London Authority and London Borough councils as important wildlife sites. They designated into three tiers:

- Sites of Metropolitan Importance

- Sites of Borough Importance (borough grade 1 and borough grade 2)

- Sites of Local Importance.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Royal Botanic Gardens, Kew	Metropolitan	0.5km – North-west	Large area of various high-quality habitats, presence of two bat roosts, several nationally scare plant species and populations of herpetofauna.
East Sheen and Richmond Cemeteries and Pesthouse Common	Local	0.5km - South	Site consist of a Cemetery and area of abandoned woody scrub with several nationally scare and rare plant species
Richmond Park and associated areas	Metropolitan	0.5km- South	Designated due to the presence of ancient woodland and extensive populations of nationally rare invertebrates, fungi and hole-nesting birds.
North Sheen and Mortlake Cemeteries	Local	0.6km – North-east	Area of semi-natural grassland and woodland habitat designated for populations scare and rare plant species
Royal Mid-Surrey Golf Course	Borough Grade I	0.7km - West	Large golf course with multiple habitat types used by a range of species group. Adjacent to Kew Gardens.

Site Name	Designation	Distance and Direction from Site (km - N/S/W/E)	Description/Summary of Reason for Designation
Pensford Field	Local	0.8km - North	Area of managed semi-natural grasslands with a created pond.
Kew Meadow Path	Borough Grade II	1.2km – North-east	Designated for the populations of rare invertebrates found on the site: two-lipped doorsnail *Balea biplicata* and stag beetle.
Terrace Field and Terrace Garden	Local	1.3km - South	Area of grassland and meadows with marginally trees. Noted for its views of the River Thames
Twickenham Road Meadow	Local	1.4km - West	Designated for scare plant species present within the grassland habitats.
River Thames and tidal tributaries	Metropolitan	1.4km – Worth-east	Designated for wildfowl and waders such as the black red-start. Two rare plant species: - Marsh sow-thistle *Sonchus palustris* - Cut-grass *Leersia oryzoides*.
Occupation Lane, Kew Railway Bridge	Borough Grade II	1.6km - North	Habitat of the rare two-lipped doorsnail *Balea biplicata* only found in a handful of sites in the UK.
Petersham Meadows	Borough Grade II	1.6km - South	Meadow and wet grassland adjacent to Thames River.
Tide Meadow at Syon Park	Metropolitan	1.7km - West	Designated due to the presents of numerous scare plant species i.e. Sea club-rush *Bolboschoenus maritimus* and nationally rare invertebrates such as the, Thames/two-lipped door snail *Balia biplicata*.
Syon Park	Borough Grade I	1.8km - West	Area of meadow and woodland with two ponds, several scare plant species found at this site.
Kew Pond and Kew Green	Local	1.9km - North	Designated for rare or scarce plant species present on site.
Marble Hill Park and Orleans House Gardens	Local	1.9km – South-west	Designated for the veteran trees that can be found on site including a huge black walnut tree *Juglans nigra*.

Table 3.1 – Non-Statutory Protected Sites within 2km of the site.

Habitats and Flora

3.7. The site supports the following habitats:

- Amenity Grassland;
- Buildings and Hardstanding;
- Dense Scrub;
- Ephemeral/Short Perennial;

- Introduced Shrub
- Scattered Broadleaved Trees
- Scattered Scrub; and,
- Tall Ruderal.

3.8. For ease of reference, habitat types have been described alphabetically, below. All the features described are shown on the 11778_P01b Habitat Features Plan.

Amenity Grassland

3.9. Several small areas of amenity grassland are present in the northern area of the site; along the north section of the eastern boundary, along the northern boundary and at the top of car parking areas (see Habitat Feature Plan 11778_P01b). The amenity grassland found throughout the site contains

species typical of this habitat type including annual meadow grass *Poa annua*, perennial rye grass *Lolium perenne*, geranium *Gernium sp.*, common ivy *Hedera helix*, common daisy *Bellis perennis*, dandelion *Taraxacum officinale* and thistle sp *Cirsium sp*. These areas are regularly mown producing a low sward. The amenity grassland is of low species diversity and comprises a heavily managed short sward and as such it is of **negligible ecological importance**.

Buildings and Hardstanding

3.10. Areas of hardstanding are present within the site in the form of tarmac roads and carparks in the north and south-west sections of the site (see Habitat Feature Plan 11778_P01b), large areas of concrete with large shelving units south of B1, and brick paths (see photograph 3.1). One strip of pavement along the western wall of B1 is broken by emergent vegetation consisting of willow herb *Epilobium hirsutum*, buddleia *Buddleja davidii* and dandelion. As hardstanding has no inherent ecological importance and the area in which there was emergent vegetation was so small, this habitat is of **negligible ecological importance**.

Photograph 3.1: Hardstanding in the west of the site.

3.11. One building (B1) was identified during the site visit which is located in the centre of the site. The building is a red brick construction with a tiled pitch roof. The roof has an extended overhang with wooden cladding around the rim. The building is surrounded by hardstanding.

3.12. The building with the site is generally in good repair given their active use, and as the buildings offer little to the biodiversity resource to the site they are considered to be of **negligible ecological importance**. The potential of the building to support roosting bats, along with photos of the buildings that were assessed for their potential to support roosting bats, are provided in Section 3; Fauna.

Dense Scrub

3.13. A small area of dense scrub is present in the south-west corner of the site between railway lines, comprising of bramble *Rubus fruticosus agg.*, common nettle *Urtica dioica*, buddleia, dandelion, common ivy and sycamore *Acer pseudoplatanus*.

3.14. A second small are of dense scrub was identified in the northern corner of the site, within the bus park area Species present included vetch, cocks' foot *Dactylis glomerata*, Yorkshire fog *Holcus lanatus*, cleavers, dandelion, common ivy, bluebell *Hyacinthoides non-scripta*, daffodil *Narcissus sp.*, bramble, geranium, buddleia, cherry laurel *Laurus nobilis*.

3.15. Given the small extent of these two areas, they are considered to be of **ecological importance within the context of the site only.**

Ephemeral/Short Perennial

3.16. One small area of ephemeral/short perennial habitat was identified within the north bus park area, adjacent to manor road. The area is composed of Annual meadow grass, yarrow *Achillea millefolium*, dandelion, red dead-nettle *Lamium purpureum*, herb-Robert *Geranium robertianum*, common ivy and cleavers *Galium aparine*. Given the small size of this area of habitat it is considered to be of **negligible ecological importance.**

Introduced Shrub

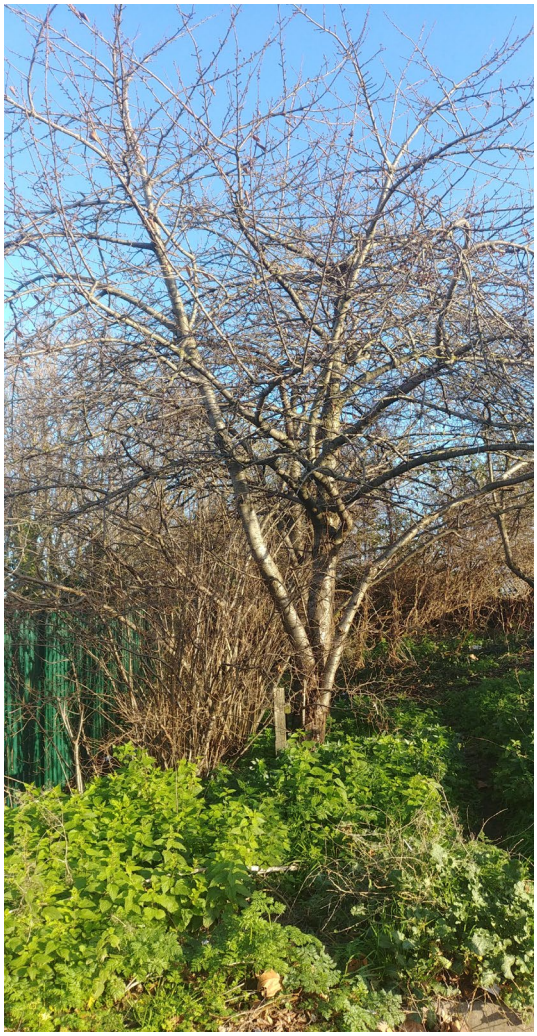
3.17. Several small areas of introduced shrub were identified on the site along the eastern boundary of the site, and small patch surrounded by hardstanding in the car park area. These patches comprised of ornamental non-native species cotoneaster *horizontalis*, buddleia and native cherry laurel. Given their small size and largely composed of non-native species, these habitat areas are considered to be of **negligible ecological importance.**

Scattered Broadleaved Trees

3.18. Within the site there are several planted, young to semi-mature tree species present; along the east boundary surrounded by amenity grassland, within the car park area planted between bays, in an area of introduced shrub to the west of car park and along the east boundary (see Photograph 3.2). The tree species are composed of *Prunus sp*. common lime *Tilia* × *europaea*, sycamore, and silver birch *Betula pendula.*

Photograph 3.2: Scattered broadleaved trees in the north of the site.

3.19. Two more areas of scattered trees were identified during the second phase 1 survey within the northern bus park area. Two small cherry trees *Prunus avium* within an area of ephemeral/short perennial and several scattered trees; namely hazel *Corylus avellane*, hawthorn *Crataegus monogyna* and cherry within the dense scrub in the most northerly area of the bus park (See Photograph 3.3).



Photograph 3.3: Scattered broad leaved trees within the dense scrub area.

Due to their age, position within the site and native species composition, this area of habitat is considered to be of **ecological importance within the context of the site only**.

Scattered Scrub

Several small areas of scattered scrub are present throughout the site; on the east site boundary between amenity grassland and introduced shrub and running along the west boundary fence parallel to the railway track a largely composed of cotoneaster with common ivy, nettle, bramble, dandelion, sycamore saplings and ribwort plantain *Plantago lanceolata* (See photograph 3.4). Given the small area present within the site and the largely non-native composition of the habitat, area of habitat is considered to be of **ecological importance within the context of the site only**.

Photograph 3.4: Scattered scrub along the east boundary

Tall Ruderal

3.17. One small patch of tall ruderal vegetation is present on the southern boundary of the site, consisting of elder *Sambucus nigra*, common ivy, bramble, common nettle and cleavers *Galium aparine*. Given the small area present within the site this area of habitat is considered to be of **ecological importance within the context of the site only**.

Target Notes

Target Note 1

3.18. Area of bare ground with piles of turf and grass clipping (see Habitat Feature Plan 11778_P01b). Potential refugia for reptiles and hedgehogs.

Target Note 2

3.19. Woody climbers along western fence boundary, parallel to the railway track (see Habitat Feature Plan 11778_P01b). Composed of elder, cotoneaster and common ivy.

Flora

3.20. One protected species of flora: bluebell was identified on site within the dense scrub in the north of the site.

Protected and Priority Fauna

Amphibians

3.21. Three records of great crested newt *Triturus cristatus* (GCN) were returned within 2km of the site, the most recent of which was recorded in 2017.

3.22. A desk study of available aerial photography was conducted finding two ponds within a 500m radius of the site. As both waterbodies are on privately owned land a Habitat Suitability Assessment[4] could not be conducted on these waterbodies at the time of this report.

3.23. Terrestrial habitats at the site are considered to be largely unsuitable for GCN (predominantly hardstanding ground with small areas of amenity grassland, scattered scrub and introduced shrub). The areas of suitable habitat (scrub) are small and exhibit little to no connectivity with the wider landscape.

3.24. Due to the lack of suitable terrestrial habitat for GCN, lack of ponds or suitable waterbodies on or adjacent to the site and the presence of numerous land barriers; main roads, fenced gardens, buildings and between the site and the closest ponds, GCN are not considered to be a feature of the site.

Bats

3.25. Within 2km of the site, records of Brandt's bat *Myotis brandtii*, brown long-eared bat *Plecotus auratus*, common pipistrelle *Pipistrellus*, Daubenton's bat *Myotis daubentoniid*, lesser noctule *Nyctalus leisleri*, Nathusius' pipistrelle *Pipistrellus nathusii*, Natterer's bat *Myotis nattereri*, noctule bat *Nyctalus noctule*, serotine *Eptesicus serotinus*, soprano pipistrelle *Pipistrellus pygmaeus* and whiskered bat *Myotis mystacinus* were identified. The most recent of these was of a brown long-eared bat in 2017.

3.26. The building and trees within the site boundary were assessed for their potential to support roosting bats. The only building found on site; B1 is constructed of red brick with a corrugated clay tile roof. The roof is pitched with an extended overhang from the wall, with a wooden soffit box running around the length of the overhang (See Photograph 3.6).

Photograph 3.6: View of the building from the front, facing north.

[4] Habitat Index Assessment; HIS a quantitively method of determining a waterbodies suitability to support Great Crested Newts, using a combination of factors.

3.27. There is little cladding on the building itself, aside from the plastic 'Homebase' sign on the western wall, the building is well sealed and in good repair. No entry points or roost features were identified during the PBRA of the building. It is there for considered to have **negligible potential** for roosting bats.Bats are known to use railway corridors as commuting routes to and from feeding areas and roosts. While the site is well lit and does not offer suitable foraging habitat for bats, and therefore will only be used operatically. The vegetation along the southern boarder could act as a possible commuting corridor for access to site in the wider Borough area.

Badger

3.28. Within 2km of the site, 21 records of Badger *Meles meles* were returned the most recent from 2017.

3.29. No signs of badgers were identified on the site. The habitats on site are sub-optimal due to the large areas of hardstanding and only small areas of scattered scrub and tall ruderal vegetation. However, the is optimal habitat within the wider area such as the railway corridor along the south and west boundaries, allotments and woodland that are much more likely to be used by badgers, making them less likely to use the sub-optimal habitat found on site. Furthermore, the site is geographically isolated by railways running along the west and south site boundaries and roads to the north and east, making access to and use of the site by badgers unlikely. Therefore, badgers are not considered a feature of the site.

Birds

3.30. Records of birds within 2km of the site include species red listed species according to the Birds of Conservation Concern (BoCC) criteria[5], including redwing *Turdus iliacus,* house sparrow *Passer domesticus*, tree sparrow *Passer montanus,* starling *Sturnus vulgaris*¸ yellow wagtail *Motacilla flava*.

3.31. The site has limited potential to support breeding bird populations with most of the site being large areas of hardstanding. The habitats areas within the site listed above; scattered trees, scattered scrub, introduced shrub, dense scrub and tall ruderal along the west, east and south boundaries have potential to support small populations of common and widespread bird species.

3.32. Therefore, any populations of birds utilising the site are considered to be of **site importance only**.

Invertebrates

3.33. The data search showed records of several species of invertebrate listed SoPI listed in the NERC Act (2006) as including the Stag Beetle *Lucanus cervus* with 16 records. The stag beetle is a London BAP species and protected under and protected under the Conservation of Habitats and Species Regulations 2017.

3.34. There is limited suitable habitat with diversity therefore a significant population of rare or notable invertebrate species would not be expected. As such the any invertebrate populations are likely to be of **negligible ecological importance.**

[5] The Bird Species of Conservation Concern (BoCC) categorises bird species into the following classifications:
* Red List species are bird species of high conservation concern, such as those whose population or range is rapidly declining, recently or historically, and those of global conservation concern.
* Amber List species are bird species of medium conservation concern, such as those whose population is in moderate decline, rare breeders, internationally important and localised species, and those of unfavourable conservation status in Europe.
* Green List species are bird species in the least critical group of conservation concern, such as those that occur regularly in the UK but do not qualify under any of the above criteria.

West European Hedgehog

3.35. A total of 288 records of West European Hedgehog *Erinaceus europaeus* were identified within 2km of the site, the most recent of which was recorded in 2017.

3.36. The hedgehog is listed An SoPI and a priority species under the Richmond Biodiversity Action Plan (BAP).

3.37. One area (see habitat plan 11778_P01b; Target note 1) of grass piles in the south- west corner of the site could potentially be used by hedgehogs as a hibernaculum during hibernation, however this is the only suitable area within and around the site. Therefore, any population of hedgehogs within the site; if present are likely to be a small population and only of **site importance**.

Reptiles

3.38. There are records for grass snake *Natrix* and Viviparious lizard *Zootoca vivipara* within 2km of the site. The most recent of which was of a grass snake in 2012.

3.39. There are some limited areas of habitat onsite suitable for reptile species. This comprises marginal vegetation in the south of the site and one area with suitable hibernacula a grass piles in the south-west corner of the site (see habitat plan 11778_P01b; Target note 1) and the dense scrub in the northern section of the site. 01bGiven the urban nature of the site and the limited extent of potentially suitable habitat for reptiles onsite, any population present is likely to be small and comprise common and widespread species.

Other species

3.40. No records of hazel dormouse *Muscardinus avellanarius* were returned from the data search. Hazel dormice are arboreal and generally require a well-connected and diverse habitat structure (Bright *et al*., 2006), such as that found in deciduous woodland, species-rich hedgerows and scrub. Given that there are no areas of potentially suitable habitat for hazel dormouse, it is considered that hazel dormouse is highly likely to be absent from the site and as such are not considered further within this report.

3.41. No records of European otter *Lutra lutra*, water vole *Arvicola amphibius* and white-clawed crayfish *Austropotamobius pallipes* were returned by the data search from within 2km of the site. There is no suitable habitat on site to support these species therefore they are not considered features of the site.

Invasive species

3.42. Invasive species are those listed under Schedule 9 of the Wildlife and Countryside Act 1981. With regard to invasive plant species (listed under Part II of Schedule 9), it is an offence to plant or otherwise cause to grow in the wild any plant which is included in Part II of Schedule 9.

3.43. One invasive species; Cotoneaster was identified during the PEA of the site. Cotoneaster is an (INNS) Category 2 species; requiring concerted control management and eradication as it is a high impact or presents a concern in the London area.

Section 4: Considerations in Respect of Future Development

Proposed Development

4.1. The masterplan for the site will require the demolition of the existing buildings and redevelopment of the site. The scheme comprises four new buildings between four and nine stories in height, providing retail unit (Class C3), flexible retail /community / office uses (Classes A1, A2, A3, D2, B1), provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.

4.2. The potential impacts with respect to development of the site are set out below, with reference to relevant legislation and planning policy, which is summarised in **Appendix 1**.

Protected Sites

4.3. Within 10km of the site boundary there are two sites protected under European designation; these are as follows:

- Richmond Park (SAC, NNR, SSSI), 0.5km south of the site, 846.6Ha in size; and
- Wimbledon Common (SAC, SSSI), 4.2km south-east of the site, 350Ha in size.

4.4. These statutory designated sites are separated from the site by buildings; residential and businesses, roads, hardstanding and areas of green space, and as such no direct impacts are anticipated. Two potential indirect impacts of development on these protected sites have been identified; increase in air pollution and increased recreational pressure.

4.5. In terms of potential impacts through increased air pollution, the scheme involves the removal of 150 car parking spaces from the existing site. The masterplan includes for 20 car parking spaces for the mobility impaired, but will otherwise be car free. As such, traffic levels and associated air pollutants resulting from the development of the site are likely to decrease. Potential adverse effects on these sites through a reduction in air quality are therefore considered to be unlikely.

4.6. As urban green spaces, both SAC's are managed to accommodate heavy recreational use, as stated the management plans for both sites: a strategy for Wimbledon and Putney Common (2017) and Richmond Park Management Plan (2014). In addition, both sites are primarily designated for supporting populations of stag beetles, which require dead wood to subsist on a site which is largely unaffected by recreational pressure. Wimbledon Common is also designated for supporting several areas of heathland habitats which can be affected by recreational use. However, as Wimbledon common is 4.4km away from the site and it is managed to accommodate recreational use, adverse effects are considered unlikely.

4.7. Within 2km of the site boundary there are two sites of national designation they are as follows;

- Svon Park (SSSI), 1.7km north-west of the site, 21.5Ha in size; and
- Isleworth Ait (SSSI), 2km west of the site, 3.46Ha in size.

4.8. These sites are not directly adjacent to the site boundary and geographically isolated by buildings, greenspace, hardstanding and roads. Therefore, the proposed development is not considered to

have any direct or indirect impacts on the site and no specific mitigation is required.

4.9. Within 2km of the site boundary there are 16 non-statutory sites as discussed in **Section 3**;

4.10. None of the non-statutory sites border the site, the closest of which; Kew Botanic Gardens is 0.5km north-west of the site boundary therefore it is highly unlikely that any direct impacts on any of the sites will occur. Indirect increased recreation pressure upon the sites can be mitigated by the incorporation of multi-functional green space within the site boundary, furthermore several of the sites close to the site boundary are already managed for recreational purposes and are readily publicly accessible, therefore it is highly unlikely any indirect effects will occur.

Habitats and Flora

4.11. As per the A3004 Manor Road GLA per-app document 1, it is likely that the majority of existing habitats on site will be lost to the development. However, all habitats identified are of negligible or site ecological importance only, therefore the legislation is not triggered, and no specific mitigation is required. Consideration should be given to retaining and enhancing the boundary trees and scrub within the development if possible.

4.12. In addition, in line with the NPPF and the Borough of Richmond Local Plan there is a significant opportunity for biodiversity gain on the site, thought the inclusion of new opportunities for specific species groups and the planting of native flora.

Invasive flora

4.13. The site contains one species of invasive non-native plant, Cotoneaster which is designated by the INNS as Category 2, this may require an invasive species specialist to be properly removed from the site to avoid spreading the species during site clearance.

Fauna

Birds

4.14. In England and Wales, birds and their nest are protected under the Wildlife and Countryside Act (1981) (as amended).

4.15. The site has the potential to support nesting and foraging birds within the scattered trees, tall ruderal and dense scrub vegetation present on site. As such any vegetation clearance occurring during breeding bird season between (March - August); a pre-works check of the proposed removed vegetation should be undertaken Ecological Clerk of Works (ECoW) to determine if any nesting birds are present. Should any active nests be discovered contain either eggs or chicks the nest must be retained and buffered until an ECoW has confirmed the chick have fledged.

4.16. Furthermore, the habitat on site provides an opportunity for a biodiversity gain by improving the habitats suitable for breeding birds; scattered scrub, scattered trees, tall ruderal and dense scrub. Bird boxes along tree lines could be provides encouraging species to the site and providing a net biodiversity gain.

Bats

4.17. In England and Wales, bats and their roost are fully protected un the Wildlife and Countryside Act (1981) (as amended).

4.18. While the site has limited potential to support roosting bats it maybe be used by commuting and opportunistic foraging bats. While the habitats present on site itself are not suitable for foraging bats, the railway corridor along the west and south of the site boundary provides opportunity for commuting bats. Lighting at the site during the construction and operation phases of the development should be sympathetic to bats that may be utilising the trees boundaries of the site for commuting and foraging activity. Any lightning for the proposed development should be designed to minimise disturbance to bats (e.g. through the use of timers, provision of low-level bollard lighting, use of hoods or cowls on lights, and provision of warm-white LED lighting – Collins, 2016; Institute of Lighting Professionals and BCT, 2018).

Reptiles

4.19. Common reptile species in the UK are afforded some protection under the WCA 1981 (as amended). All common reptile species (slow worm *Anguis fragilis*, grass snake, viviparous lizard and adder *Vipera berus*) are SoPI.

4.20. As the amount of suitable habitat on site is limited in extent, habitat manipulation should be undertaken within the active season for reptiles (which is between mid-March and October inclusive) to encourage them to leave the development area and prevent them being killed or injured during construction. Habitat manipulation should be directional, moving from south to north, thus displacing the reptiles in the direction of suitable habitat to the west and north, along the railway corridor and allowing them to disperse to other areas of more suitable habitat within this corridor.

4.21. In the first instance, the area of scrub (if it is to be removed) should be reduced to 200mm in height. Vegetation will be cleared using hand tools (such as strimmers and brushcutters or hand-held shears). This should be completed under the supervision of an ecologist. Any hedgerows and trees affected should be felled using hand tools, and tree stumps/ root systems left in-situ until after mid-March to avoid impacting hibernating reptiles.

4.22. Following the completion of the first phase, the vegetation should then be cut back to ground level at least one week after completion of the first phase. A destructive search of the area can then be carried out under the supervision of an ecologist to ensure that any remaining reptiles are removed from the area, placed in a container and moved to an area of retained suitable habitat or the offsite area of suitable habitat.

4.23. No ground works should be undertaken in the area until the habitat manipulation exercise is complete. The vegetation in the construction footprint should then be regularly strimmed to ensure that the sward is kept below 150mm and remains unsuitable for reptiles during development works.

4.24. The timings of the works should also take into consideration the recommendations previously with respect to breeding birds and hedgehogs, which recommends that any clearance of vegetation suitable for breeding birds should be undertaken outside of the bird nesting season i.e. between September and February or if undertaken in the presence of an ECoW The habitats on the site that are suitable for breeding birds are scattered trees, dense scrub, scattered scrub and tall ruderal. The clearance of these habitats should not impact hibernating reptiles if carried out between February and mid-March, providing the recommendations set out below are followed.

West European Hedgehog

4.25. In England and Wales, hedgehogs are listed as a SoPI under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

4.26. As the site has potential habitat to support hedgehogs and there are 288 records from within 2km any potential habitat that might be used by hedgehogs should be retained where possible. However, if suitable habitat is removed it should be done so outside of the hibernation period (October to April). If removal is necessary within this period, a hand search should be undertaken by an ECoW before works take place. Should any hedgehogs be found during habitat removal or construction they should be removed by and from the site and place in suitable similar habitat to where they were found.

4.27. Within the area of the site habitats identified as suitable for hedgehogs should be retained and enhanced with native and local stock of plant species where possible. In regards, to hedgehogs the site can be enhanced to benefit them, by improving the scattered scrub and tall ruderal habitats. Features could also be provided to enhancing and improve hedgehog use of the site, the inclusion of a hedgehog highways; small holes in the site boundary fencing that would all for connectivity of on-site habitats to the wider landscape and hedgehog boxes, would do this.

Ecological Design Principles and Enhancement Opportunities

4.28. The National Planning Policy Framework (NPPF) encourages development to provide net gains in biodiversity where possible. Therefore, an effort has been made through the design process to provide ecological enhancement with the aim of delivering an overall increase in biodiversity of the site. This would also be in-line with the Policies LP15 and LP17 (Biodiversity) of the Local plan as well as the Richmond BAP.

4.29. Considering the relevant policies, summarised above, the proposed development complies with these policies through adopting relevant principles that have been incorporated into the design as the scheme has evolved. These are summarised below:

- Creation of green infrastructure within the development, which can be multi-functional, delivering biodiversity, and drainage benefits;
- Retention of existing habitats where possible, including the dense scrub in the south-west and north of the site and the linear vegetation adjacent to the railway corridors that abut the site;
- Planting of native flora/species of known benefit to wildlife as part of newly created habitats. This includes shrubs, trees, grasses and forb species;
- Inclusion of brown; sedum roofs and terrace gardens as per A3004 Manor Road GLA per-app document 1, to increase areas of accessible green space and provide a net gain in habitats on site post-development;

4.30. Additional measures are proposed to be included as part of detailed design that will provide biodiversity enhancement. These should be controlled though appropriately worded planning conditions and are summarised below:

- Placement of bug hotels within terrace gardens, sedum roofs and newly created habitats, and the inclusion of bee bricks within suitable brick walls, across the site to encourage insects to the site;
- Sensitive lighting design along south and west rail corridors to avoid disturbance of commuting bats along the south and west site boundaries;
- Integration of hedgehog boxes into suitable pre-existing or newly created habitat to facilitate and encourage hedgehog use of the site, and;

- Addition of bird and bat boxes across the site to improve nesting roosting opportunities; Swift boxes on high-rise buildings, bird boxes on lower buildings and on newly planted or retained buildings and box boxes on south facing walls of buildings facing the potential bat corridor on along the southern boundary of the site.

Further work

4.31. Although no further surveys are required to inform the planning application, as is detailed by ODPM Circular 06/05 and BS 42020:2013 'Biodiversity – Code of practice for planning and development', it will be necessary to undertake precautionary checks to confirm whether legally protected and/or priority species would be affected by proposed development of the site. These surveys are summarised below.

- **Nesting Birds (pre-works check):** If building demolition or vegetation/tree removal is to occur between March-August, a pre-works check by an ECoW should be undertaken to determine whether active birds' nests are present. If nest(s) are present, no nests, eggs or young should be destroyed and an appropriate buffer must be instated until the chicks have been confirmed as fledged by an ECoW.

- **Hedgehogs (pre-works check):** If vegetation removal occurs on the site, a pre-works check by an ECoW should be undertaken to determine if any hedgehog are active on the site. If found, they will be removed by hand to a predetermined off-site location with similar and suitable habitat to that in which they were found.

- **Reptiles (precautionary staged vegetation removal):** If scrub removal occurs on site, the habitat should be manipulated ass outlined in the method described above.

Section 5: Conclusions

5.1. No ecological issues that could affect the principle of development of the site have been identified. Those important ecological features that exist, or could exist, at the site have been accommodated through the adoption of simple design principles as described in paragraph 4.29. The potential to improve the biodiversity of the site also exists, and recommendations are made that should contribute to local BAP targets as described in paragraph 4.30 which can be secured through appropriately worded planning conditions.

5.2. In conclusion, the proposed development would accord with the NPPF and Policies LP15 and LP17 of the London Borough of Richmond Upon Thames Local Plan. The aim of which is to protect and enhance existing ecological features and provide a net gain in biodiversity.

References

Baillie, S.R., Crick, H.Q.P., Balmer, D.E., Beaven, L.P., Downie, I.S., Freeman, S.N., Leech, D.I., Marchant, J.H., Noble, D.G., Raven, M.J., Simpkin, A.P., Thewlis, R.M. and Wernham, C.V. (2002). *Breeding Birds in the Wider Countryside: their conservation status 2001*. BTO Research Report No. 278. BTO, Thetford.

Bright, P., Morris, P. and Mitchell-Jones, A. (2006). *The Dormouse Conservation Handbook. Second Edition*. English Nature, Peterborough.

Chartered Institute of Ecology and Environmental Management (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland, 2nd Edition*. http://www.cieem.net/ecia-guidelines-terrestrial-. Chartered Institute of Ecology and Environmental Management, Winchester.

Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd Edition.* The Bat Conservation Trust, London.

Institute of Lighting Professionals and Bat Conservation Trust (2018*) Guidance Note 08/18: Bats and artificial lighting in the UK; Bats and the Built Environment series*. ILP, Rugby, Warwickshire

Cresswell, P., Harris, S. & Jefferies, D.J. (1990). *The history, distribution, status and habitat requirements of the badger in Britain*. Nature Conservancy Council, Peterborough.

English Nature (2001). *Great crested newt mitigation guidelines*. English Nature, Peterborough.

English Nature (2002) *Badgers and development*. English Nature, Peterborough

English Nature (2004). *Reptiles: Guidelines for Developers*. English Nature, Peterborough.

Gibbons, D.W., Reid, J.B. and Chapman, R.A. (1993). *The New Atlas of Breeding Birds in Britain and Ireland: 1988-1991*. Poyser.

Highways Agency (2013). *Design Manual for Road Bridges*. http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol11/index.htm. Highways Agency, Guildford

Joint Nature Conservation Committee (2010). *Handbook for Phase 1 habitat survey - a technique for environmental audit*. JNCC, Peterborough.

Langton, T., Beckett, C. And Foster, J. (2001) *Great Crested Newt Conservation Handbook*. Froglife, Halesworth.

LUC. (2016). *London Borough of Richmond upon Thames Publication Local Plan Habitats Regulations Asset Report*. https://www.richmond.gov.uk/media/13322/local_plan_publication_habitats_regulations_assessment_report_2016.pdf. LUC, London.

Appendix 1: Legislation and Planning Policy

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Legislative Context

A1.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:

- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2010 (as amended);
- The Countryside and Rights of Way (CRoW) Act 2000;
- The Hedgerows Regulations 1997;
- The Protection of Badgers Act 1992;
- The Natural Environment and Rural Communities Act (NERC) 2006; and
- The Wild Mammals (Protection) Act 1996.

A1.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2010 (as amended).

A1.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.

A1.4. The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Species and Habitats of Principal Importance and the UK Biodiversity Action Plan

A1.5. The UK Post-2010 Biodiversity Framework succeeded the UK BAP partnership in 2011 and covers the period 2011 to 2020. However, the lists of Priority Species and Habitats agreed under the UKBAP still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A Strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been succeeded, Species Action Plans (SAPs) developed for the UK BAP remain valuable resources for background information on priority species under the UK Post-2010 Biodiversity Framework.

A1.6. Priority Species and Habitats identified under the UKBAP are also referred to as Species and Habitats of Principal Importance (SoPI/HoPI) for the conservation of biodiversity in England and Wales within Sections 41 (England) and 42 (Wales) of the Natural Environment and Rural Communities (NERC) Act 2006. The commitment to preserving, restoring or enhancing biodiversity is further emphasised for England and Wales in Section 40 of the NERC Act 2006.

National Planning Policy

National Planning Policy Framework (NPPF), July 2018

A1.7. The National Planning Policy Framework (NPPF) was published in July 2018 and sets out the Government's planning policies for England and how these should be applied. It replaces the first National Planning Policy Framework published in March 2012.

A1.8. Paragraph 11 states that:

"Plans and decisions should apply a presumption in favour of sustainable development."

A1.9. Section 15 of the NPPF (paragraphs 170 to 177) considers the conservation and enhancement of the natural environment.

A1.10. Paragraph 170 states that planning and decisions should contribute to and enhance the natural and local environment by:

a) "protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"

A1.11. Paragraph 171 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

A1.12. Paragraph 174 states that in order to protect and enhance biodiversity and geodiversity, plans should:

a) "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

A1.13. When determining planning applications, Paragraph 175 states that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

a) "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;
b) development on land within or outside a Site of Special Scientific Interest, 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 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 Sites of Special Scientific Interest;
c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons58 and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity."

A1.14. As stated in paragraph 176 the following should be given the same protection as habitats sites:

a) "potential Special Protection Areas and possible Special Areas of Conservation;
b) listed or proposed Ramsar sites; and
c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."

A1.15. Paragraph 177 states that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

Office of the Deputy Prime Minister (ODPM) Circular 06/2005: Biodiversity and Geological Conservation - Statutory Obligations and their Impact within the Planning System

A1.16. ODPM Circular 06/05 was prepared to accompany PPS9, however continues to be valid, and material in the consideration of planning applications since PPS9's replacement by the NPPF.

A1.17. ODPM Circular 06/05 provides guidance on applying legislation in relation to nature conservation and planning in England. Part I considers the legal protection and conservation of internationally designated sites (namely candidate Special Areas of Conservation (cSACs), SACs, potential Special Protection Areas (pSPAs), SPAs and Ramsar sites) and Part II considers the legal protection and conservation of nationally designated sites, namely Sites of Special Scientific Interest (SSSIs).

A1.18. Part III considers the protection of habitats and species outside of designated areas (particularly UK Biodiversity Action Plan species and habitats, which it states are capable of being a material consideration in the preparation of local development documents and the making of planning decisions.

A1.19. Part IV considers species protected by law and states that the presence of a protected species is a material consideration in the consideration of a development proposal that, if carried out, would be likely to result in harm to the species or its habitat and that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.

London Borough of Richmond Upon Thames Local Plan (2018)

A1.20. The Local Plan sets out strategic policies relating to the development of land use in Richmond Borough and development proposals for the strategic sites identified within it. The local plan sets out to guide new development within the Borough for the period up until 2033. The following policies relate to biodiversity and are therefore applicable to this site:

A1.21. Policy LP 9

Floodlighting

Floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions. The following criteria will be taken into account when assessing floodlighting:

1. *the impacts on local character or historic integrity;*

2. *the impacts on amenity and living conditions;*

3. *the impacts on biodiversity and wildlife;*

4. *the benefits and impacts of the provision of floodlighting on the wider community;*

5. *the benefits and effects on the use and viability of the facility;*

6. *that it meets an identified need as set out within the council's playing pitch strategy;*

Favourable consideration will be given to the replacement or improvement of existing lighting where it provides improvements to existing adverse impacts.

A1.22. Policy LP 15

Biodiversity

A.The Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats. Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats including National Nature Reserves, Sites of Special Scientific Interest (SSSI) and Other Sites of Nature Importance as set out in the Biodiversity Strategy for England, and the London and Richmond upon Thames Biodiversity Action Plans. This will be achieved by:

1. *protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value;*

2. *supporting enhancements to biodiversity;*

3. *incorporating and creating new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate; major developments are required to deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible;*

4. *ensuring new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;*

5. *enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and 6. maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.*

B. Where development would impact on species or a habitat, especially where identified in the relevant Biodiversity Action Plan at London or local level, or the Biodiversity Strategy for England, the potential harm should:

1. *firstly be avoided (the applicant has to demonstrate that there is no alternative site with less harmful impacts),*

2. *secondly be adequately mitigated; or*

3. *as a last resort, appropriately compensated for.*

A1.23. Policy LP 17

Green roofs and walls

Green roofs and/or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green / brown roof.

The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated, where appropriate, if it has been demonstrated that a green / brown roof is not feasible.

The use of green / brown roofs and green walls is encouraged and supported in smaller developments, renovations, conversions and extensions.

Biodiversity Actions Plans

A1.24. The UK Post-2010 Biodiversity Framework succeeded the UK BAP partnership in 2011 and covers the period 2011 to 2020. However, the lists of Priority Species agreed under the UK BAP still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been superseded, Species Action Plans (SAPs) and Habitat Action Plans (HAPs) developed for the UK BAP remain valuable resources for background information on priority species under the UK Post-2010 Biodiversity Framework.

A1.25. Most areas now possess a Local BAP (LBAP) to complement the national strategy where priority habitats and species are identified, and targets set for their conservation. BAP's are the key nature conservation initiative in the UK, working at national, regional and local levels.

A1.26. The London Borough of Richmond Upon Thames Biodiversity Action Plan was updated and re launched in 2017. It was prepared through the Richmond Biodiversity Partnership and sets out conservation targets and contains action plans for various priority habitats and species in Richmond Borough area.

Plans

Habitat Features Plan
11778_P01b

- Site Boundary
- Building
- Hardstanding
- Bare Ground
- Amenity Grassland
- Dense Scrub
- Ephemeral /Short Perennial
- Introduced Scrub
- Scattered Broad Leaved Trees
- Scattered Scrub
- Tall Ruderal
- Wall
- Fence
- Target Note

N

0 50 m

Project	Homebase North Sheen
Drawing Title	**Habitat Features Plan**
Scale	As Shown (Approximate)
Drawing No.	11778/P01b
Date	January 2019
Checked	cc

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