66 STATION ROAD, HAMPTON, LONDON

PRELIMINARY ECOLOGICAL APPRAISAL

A Report to: Hampton Care Home Ltd

Report No: RT-MME-150446-01

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REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

This study has been undertaken in accordance with British Standard 42020:2013 “Biodiversity, Code of practice for planning and development”.

Report Version	Date	Completed by:	Checked by:	Approved by:
Final	30/08/2019	Gemma Luckhurst (Ecological Project Officer), Harry Stone (Ecological Project Officer) and Thomas Kenny (Ecological Project Assistant)	Paul Roebuck BSc, MSc, MCIEEM (South East Manager)	Dr Philip Fermor CEnv MCIEEM (Managing Director)
Rev A	02/09/2019	Harry Stone (Ecological Project Officer)	Indre Barsketyte MSc Grad CIEEM (Principal Ecological Consultant)	Dr Philip Fermor CEnv MCIEEM (Managing Director)

The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management’s Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

DISCLAIMER

The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client’s brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

VALIDITY OF DATA

The findings of this study are valid for a period of 24 months from the date of survey. If works have not commenced by this date, 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.

NON-TECHNICAL SUMMARY

Middlemarch Environmental Ltd was commissioned by Hampton Care Home Ltd to carry out a Preliminary Ecological Appraisal at the site of a proposed residential development at 66 Station Road, Hampton, London. To fulfil this brief an ecological desk study and a walkover survey (in accordance with Phase 1 Habitat Survey methodology) were undertaken.

The ecological desk study revealed one European statutory site within 5 km of the survey area, three UK statutory sites within 2 km and six Non-statutory sites within 1 km. The desk study also provided records of protected/notable species within a 1 km radius of the survey area including: bats, badger, hedgehog, water vole, red squirrel, common shrew, amphibians, reptiles and birds.

The walkover survey was undertaken on 01st August 2019 by Harry Stone (Ecological Project Officer) and Gemma Luckhurst (Ecological Project Officer). The site is a trapezium shaped parcel of land, which is dominated by hardstanding and buildings. The site also contains the buildings and garages of a former police station. Within the site there are several scattered trees and areas of scattered shrub and ephemeral vegetation. The site is situated amongst a primarily residential area with roads, houses and a school in the immediate vicinity.

In order to ensure compliance with wildlife legislation and relevant planning policy, the following recommendations are made:

- **Nature Conservation Sites**: The proposed works could potentially indirectly impact upon Beveree Wildife Site which is designated as a Local site in the Borough of London. Therefore, a Construction Ecological Management Plan (CEcMP) should be compiled for the site. The aim of the CEcMP is to minimise the potential impact of the construction phase of the development on the existing ecology of the site and off site receptors, and ensure works proceed in accordance with current wildlife legislation. This document should be agreed with the Local Planning Authority ecologist prior to any works commencing.
- **Habitat Retention and Protection:** The development proposals should be designed (where feasible) to allow for any Trees/Hedgerows on or overhanging the site, which are retained as a part of any proposed works, to be protected in accordance with British Standard 5837: 2012.
- **Biodiversity Enhancement:** In accordance with the provision of Chapter 15 of the National Planning Policy Framework (Conserving and Enhancing the Natural Environment) and Local Planning Policy, biodiversity enhancement measures should be incorporated into the landscaping scheme of any proposed development to work towards delivering net gains for biodiversity.
- **Roosting Bats:** A Preliminary Bat Roost Assessment should be undertaken on buildings and suitable trees which may be impacted by the proposed development works. This assessment can be completed at any time of year. Dependent upon the results of the preliminary assessment, nocturnal emergence and dawn re-entry surveys could be required.
- **Terrestrial Mammals including Badger and Hedgehog:** Any excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape. Any open pipework with an outside diameter of greater than 120 mm must be covered at the end of each workday to prevent animals entering/becoming trapped.
- **Nesting Birds**: Vegetation and building clearance should be undertaken outside the nesting bird season. The nesting bird season is weather dependent but generally extends between March and September inclusive (peak period March-August).
- **Cotoneaster and Buddleia:** The works must not cause cotoneaster *Cotoneaster frigidus* or buddleia *Buddleja davidii* to spread in the wild. It must either be left in situ or removed with care during vegetation clearance and disposed of in an appropriate manner.

CONTENTS

1. INTRODUCTION

1.1 PROJECT BACKGROUND

In July 2019, Hampton Care Home Ltd commissioned Middlemarch Environmental Ltd to undertake a Preliminary Ecological Appraisal of the site of a proposed development at 66 Station Road, Hampton, London. This assessment is required to inform a planning application associated with the redevelopment of the buildings on site into a care home facility with associated gardens and parking spaces.

To assess the existing ecological interest of the site an ecological desk study was carried out, and a walkover survey was undertaken on 1st August 2019. In addition, Middlemarch Environmental Ltd was commissioned to undertake a Preliminary Bat Roost Assessment, the findings of which are detailed in the Report RT-MME-150446-02.

1.2 SITE DESCRIPTION AND CONTEXT

The development site measures approximately 0.25 ha and is located within Hampton, a suburban area on the north bank of the River Thames, in the London Borough of Richmond upon Thames. The Ordnance Survey Grid Reference of the location is TQ 150 726.

The site dominated by hardstanding, with a car park occupying most of the site. The site also contains the buildings and garages of a former police station. Within the site there are several scattered trees and areas of scattered shrub and ephemeral vegetation. A brick wall and fence mark the sites eastern and southern boundaries.

South of the site boundary is Station Road, a high street with commercial and residential buildings. The site is bordered to the east and west by neighboring properties. Running along the northern site boundary is a line of mature trees backing onto playing fields and a nature reserve. The wider landscape consists of residential houses and gardens, expansive parkland, a water treatment works and the River Thames.

1.3 DOCUMENTATION PROVIDED

The conclusions and recommendations made in this report are based on information provided by the client regarding the scope of the project. Documentation made available by the client is listed in Table 1.1.

Document Name / Drawing Number	Author
Site Layout / 11045 FE_010 P4	PRC Architecture & Planning
Basement Floor Layout / 11045 FE_011 P5	PRC Architecture & Planning
Ground Floor Layout / 11045 FE_012 P5	PRC Architecture & Planning
First Floor Layout / 11045 FE_013 P5	PRC Architecture & Planning
Second Floor Layout / 11045 FE_014 P6	PRC Architecture & Planning
Third Floor Layout / 11045 FE_015 P5	PRC Architecture & Planning
Roof Plan / 11045 FE_016 P2	PRC Architecture & Planning
Proposed Elevations Sheet 1 / 11045 FE_020 P2	PRC Architecture & Planning
Proposed Elevations Sheet 2 /11045 FE_025 P2	PRC Architecture & Planning

Table 1.1: Documentation Provided by Client

2. METHODOLOGIES

2.1 DESK STUDY

An ecological desk study was undertaken to determine the presence of any designated nature conservation sites and protected species in proximity to the site. This involved contacting appropriate statutory and non-statutory organisations which hold ecological data relating to the survey area. Middlemarch Environmental Ltd then assimilated and reviewed the desk study data provided by these organisations.

The consultees for the desk study were:

- Natural England - *MAGIC* website for statutory conservation sites;
- Greenspace Information for Greater London CIC

The desk study included a search for European statutory nature conservation sites within a 5 km radius of the site (extended to 10 km for any statutory site designated for bats), UK statutory sites within a 2 km radius and non-statutory sites and protected/notable species records within a 1 km radius.

The data collected from the consultees is discussed in Chapter 4. Selected raw data are provided in Appendix 1. In compliance with the terms and conditions relating to its commercial use, the full desk study data is not provided within this report.

The desk study also included a review of relevant local planning policy with regard to biodiversity and nature conservation (see Chapter 3).

2.2 PHASE 1 HABITAT SURVEY

The walkover survey was conducted following the Phase 1 Habitat Survey methodology of the Joint Nature Conservation Committee (JNCC, 2010) and the Institute of Environmental Assessment (IEA, 1995). Phase 1 Habitat Survey is a standard technique for classifying and mapping British habitats. The aim is to provide a record of habitats that are present on site. During the survey, the presence, or potential presence, of protected species was noted.

Whilst every effort is made to notify the client of any plant species listed on Schedule 9 of the Wildlife and Countryside Act (1981, as amended) present on site, it should be noted that this is not a specific survey for these species.

Data recorded during the field survey are discussed in Chapter 5.

3. LEGISLATION AND POLICY

This chapter provides an overview of the framework of legislation and policy which underpins nature conservation and is a material consideration in the planning process in England. The reader should refer to the original legislation for the definitive interpretation.

3.1 GENERAL BIODIVERSITY LEGISLATION AND POLICY

Conservation of Habitats and Species Regulations 2017 (The Habitats Regulations 2017)
The Habitats Regulations 2017 consolidate and update the Habitats Regulations 2010 (as amended). The Habitat Regulations 2017 are the principal means by which the EEC Council Directive 92/43 (The Habitats Directive) as amended is transposed into English and Welsh law.

The Habitats Regulations 2017 place duty upon the relevant authority of government to identify sites which are of importance to the habitats and species listed in Annexes I and II of the Habitats Directive. Those sites which meet the criteria are, in conjunction with the European Commission, designated as Sites of Community Importance, which are subsequently identified as Special Areas of Conservation (SAC) by the European Union member states. The regulations also place a duty upon the government to maintain a register of European protected sites designated as a result of EC Directive 79/409/EEC on the Conservation of Wild Birds (The Birds Directive). These sites are termed Special Protection Areas (SPA) and, in conjunction with SACs, form a network of sites known as Natura 2000. The Habitats Directive introduces for the first time for protected areas, the precautionary principle; that is that projects can only be permitted having ascertained no adverse effect on the integrity of the site. Projects may still be permitted if there are no alternatives, and there are imperative reasons of overriding public interest.

The Habitats Regulations 2017 also provide for the protection of individual species of fauna and flora of European conservation concern listed in Schedules 2 and 5 respectively. Schedule 2 includes species such as otter and great crested newt for which the UK population represents a significant proportion of the total European population. It is an offence to deliberately kill, injure, disturb or trade these species. Schedule 5 plant species are protected from unlawful destruction, uprooting or trade under the regulations.

The Wildlife and Countryside Act (WCA) 1981 (as amended)
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 2017, 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).

Schedules of the act provide lists of protected species, both flora and fauna, and detail the possible offences that apply to these species.

The Countryside and Rights of Way (CRoW) Act 2000
The CROW Act, introduced in England and Wales in 2000, amends and strengthens existing wildlife legislation detailed in the WCA. It 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.

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

The Hedgerow Regulations 1997
The Hedgerow Regulations make provision for the identification of important hedgerows which may not be removed without permission from the Local Planning Authority.

UK Post-2010 Biodiversity Framework

The UK Biodiversity Action Plan (BAP), published in 1994, was the UK Government's response to signing the Convention on Biological Diversity (CBD) at the 1992 Rio Earth Summit. The new UK Post-2010 Biodiversity Framework replaces the previous UK level BAP. The UK Post-2010 Biodiversity Framework covers the period 2011-2020 and forms the UK Government's response to the new strategic plan of the United Nations Convention on Biological Diversity (CBD), published in 2010 at the CBD meeting in Nagoya, Japan. This includes five internationally agreed strategic goals and supporting targets to be achieved by 2020. The five strategic goals agreed were:

- Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society;
- Reduce the direct pressures on biodiversity and promote sustainable use;
- To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity;
- Enhance the benefits to all from biodiversity and ecosystem services; and,
- Enhance implementation through participatory planning, knowledge management and capacity building.

The Framework recognises that most work which was previously carried out under the UK BAP is now focused on the four individual countries of the United Kingdom and Northern Ireland, and delivered through the countries' own strategies. Following the publication of the new Framework the UK BAP partnership no longer operates but many of the tools and resources originally developed under the UK BAP still remain of use and form the basis of much biodiversity work at country level. In England the focus is on delivering the outcomes set out in the Government's 'Biodiversity 2020: a Strategy for England's Wildlife and Ecosystem Services' (DEFRA, 2011). This sets out how the quality of our environment on land and at sea will be improved over the next ten years and follows on from policies contained in the Natural Environment White Paper.

Species and Habitats of Material Consideration for Planning in England

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.

3.2 NATIONAL PLANNING POLICY FRAMEWORK AND PRACTICE GUIDANCE

In February 2019, the National Planning Policy Framework (NPPF) was updated, replacing the previous framework published in 2012 and revised in 2018. The government circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact within the Planning System, which accompanied PPS9, still remains valid. A presumption towards sustainable development is at the heart of the NPPF. This presumption does not apply however where developments require appropriate assessment under the Birds or Habitats Directives.

Chapter 15, on conserving and enhancing the natural environment, sets out how the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing existing sites of biodiversity value;
- minimising impacts on and providing net gains for biodiversity; and,
- establishing coherent ecological networks.

If a proposed development would result in significant harm to the natural environment which cannot be avoided (through the use of an alternative site with less harmful impacts), mitigated or compensated for (as a last resort) then planning permission should be refused. With respect to development on land within or outside of a Site of Special Scientific Interest (SSSI) which is likely to have an adverse effect (either alone or in-combination with other developments) would only be permitted where the benefits of the proposed development clearly outweigh the impacts on the SSSI itself, and the wider network of SSSIs. Development

resulting in the loss of deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons for the development, and a suitable compensation strategy is provided.

Chapter 15 identifies that development whose primary objective is to conserve or enhance biodiversity should be supported and opportunities to incorporate biodiversity improvements in and around development should be encouraged, especially where this can secure measurable net gains for biodiversity.

Chapter 11, making effective use of the land, sets out how the planning system should promote use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. Opportunities for achieving net environmental gains, including new habitat creation, are encouraged.

In March 2014 the Department for Communities and Local Government released guidance to support the National Planning Policy Framework (NPPF), known as the National Planning Practice Guidance (NPPG).This has been produced to provide guidance for planners and communities which will help deliver high quality development and sustainable growth in England.

The guidance includes a section entitled 'Natural Environment: Biodiversity, geodiversity and ecosystems and green infrastructure', which was updated in July 2019. This document sets out information with respect to the following:

- the statutory basis for seeking to conserve and enhance biodiversity;
- the local planning authority's requirements for planning for biodiversity;
- what local ecological networks are and how to identify and map them;
- how plan-making bodies identify and safeguard Local Wildlife Sites, including Standard Criteria for Local Wildlife Sites;
- the sources of ecological evidence;
- the legal obligations on local planning authorities and developers regarding statutory designated sites and protected species;
- definition of green infrastructure;
- where biodiversity should be taken into account in preparing a planning application;
- how policy should be applied to avoid, mitigate or compensate for significant harm to biodiversity and how mitigation and compensation measures can be ensured;
- definitions of biodiversity net gain including information on how it can be achieved and assessed; and,
- the consideration of ancient woodlands and veteran trees in planning decisions and how potential impacts can be assessed.

The NPPG July 2019 issue also includes a section entitled 'Appropriate assessment: Guidance on the use of Habitats Regulations Assessment' which provides information in relation to Habitats Regulations Assessment processes, contents and approaches in light of case law. This guidance will be relevant to those projects and plans which have the potential to impact on European Sites and European Offshore Marine Sites identified under the Conservation of Habitats and Species Regulations 2017 (as amended).

3.3 LONDON PLANNING POLICY

The London Plan (consolidated with alterations since 2011)

The London Plan, is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. It is the policies in this document that form part of the development plan for Greater London, and which should be taken into account in taking relevant planning decisions, such as determining planning applications.

The 2015-16 Minor Alterations (MALPs) have been prepared to bring the London Plan in line with the national housing standards and car parking policy. The alterations were published on 14th March 2016.

The policies of relevance to ecology are:

Policy 2.18 Green Infrastructure: The Multifunctional Network of Open and Green Spaces

Strategic

A) The Mayor will work with all relevant strategic partners to protect, promote, expand and manage the extent and quality of, and access to, London's network of green infrastructure. This multifunctional network will secure benefits including, but not limited to, biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being.

B) The Mayor will pursue the delivery of green infrastructure by working in partnership with all relevant bodies, including across London's boundaries, as with the Green Arc Partnerships and Lee Valley Regional Park Authority. The Mayor has published supplementary guidance on the All London Green Grid to set out the strategic objectives and priorities for green infrastructure across London.

C) In areas of deficiency for regional and metropolitan parks, opportunities for the creation of green infrastructure to help address this deficiency should be identified and their implementation should be supported, such as in the Wandle Valley Regional Park.

Planning Decisions

D) Enhancements to London's green infrastructure should be sought from development and where a proposal falls within a regional or metropolitan park deficiency area it should contribute to addressing this need.

E) Development proposals should:

a. incorporate appropriate elements of green infrastructure that are integrated into the wider network

b. encourage the linkage of green infrastructure including the Blue Ribbon Network, to the wider public realm to improve accessibility for all and develop new links, utilising green chains, street trees, and other components of urban greening

LDF Preparation

F) Boroughs should:

a. set out a strategic approach to planning positively for the creation, protection, enhancement and management of networks of green infrastructure by producing green infrastructure strategies that cover all forms of green and open space and the interrelationship between these spaces. These should identify priorities for addressing deficiencies and should set out positive measures for the design and management of all forms of green and open space. Delivery of local biodiversity action plans should be linked to these strategies.

b. ensure that in and through DPD policies, green infrastructure needs are planned and managed to realise the current and potential value of these to communities and to support delivery of the widest range of linked environmental and social benefits

c. in London's urban fringe support, through appropriate initiatives, the vision of creating and protecting an extensive and valued recreational landscape of well-connected and accessible countryside around London for both people and wildlife.

Policy 7.19 Biodiversity and Access to Nature

Strategic

A) The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans.

B) Any proposals promoted or brought forward by the London Plan will not adversely affect the integrity of any European site of nature conservation importance (to include special areas of conservation (SACs), special protection areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects. Whilst all development proposals must address this policy, it is of particular importance when considering the following policies within the London Plan: 1.1, 2.1-2.17, 3.1, 3.3, 3.7, 5.4A, 5.14, 5.15, 5.17, 5.20, 6.3, 6.9, 7.14, 7.15, 7.25 – 7.27 and 8.1. Whilst all opportunity and intensification areas must address the policy in general, specific locations requiring consideration are referenced in Annex 1.

Planning Decisions

C) Development Proposals should:

a. wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity
b. prioritise assisting in achieving targets in biodiversity action plans (BAPs), and/ or improving access to nature in areas deficient in accessible wildlife sites
c. not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.

D) On Sites of Importance for Nature Conservation development proposals should:

a. give the highest protection to sites with existing or proposed international designations (SACs, SPAs, Ramsar sites) and national designations (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations
b. give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance
c. give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.

E) When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:

1 avoid adverse impact to the biodiversity interest
2 minimize impact and seek mitigation
3 only in exceptional cases where the benefits of the proposal clearly outweigh the bio diversity impacts, seek appropriate compensation.

LDF preparation

F) In their LDFs, Boroughs should:

a. use the procedures in the Mayor's Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.
b. identify areas deficient in accessible wildlife sites and seek opportunities to address them
c. include policies and proposals for the protection of protected/ priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets
d. ensure sites of European or National Nature Conservation Importance are clearly identified.
e. identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites.

Policy 7.21 Trees and Woodland

Strategic

A) Trees and woodlands should be protected, maintained, and enhanced, following the guidance of the London Tree and Woodland Framework (or any successor strategy). In collaboration with the Forestry Commission the Mayor has produced supplementary guidance on Tree Strategies to guide each borough's production of a Tree Strategy covering the audit, protection, planting and management of trees and woodland. This should be linked to a green infrastructure strategy.

Planning decisions

B) Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.

LDF preparation

C) Boroughs should follow the advice of paragraph 118 of the NPPF to protect 'veteran' trees and ancient woodland where these are not already part of a protected site.

D) Boroughs should develop appropriate policies to implement their borough tree strategy.

Policy 7.28 Restoration of the Blue Ribbon Network

Planning decisions

A) Development proposals should restore and enhance the Blue Ribbon Network by:

a. taking opportunities to open culverts and naturalise river channels
b. increasing habitat value. Development which reduces biodiversity should be refused

c. preventing development and structures into the water space unless it serves a water related purpose.
d. protecting the value of the foreshore of the Thames and tidal rivers
e. resisting the impounding of rivers
f. protecting the open character of the Blue Ribbon Network.

LDF preparation
B) Within LDFs boroughs should identify any parts of the Blue Ribbon Network where particular biodiversity improvements will be sought, having reference to the London River Restoration Action Plan.

Policy 7.30 London's Canals and Other Rivers and Waterspaces
Planning decisions
A) Development proposals along London's canal network and other rivers and waterspace (such as reservoirs, lakes and ponds) should respect their local character and contribute to their accessibility and active water related uses, in particular transport uses, where these are possible.
B) Development within or alongside London's docks should protect and promote the vitality, attractiveness and historical interest of London's remaining dock areas by:
a. preventing their partial or complete in-filling
b. promoting their use for mooring visiting cruise ships and other vessels
c. encouraging the sensitive use of natural landscaping and materials in and around dock areas
d. promoting their use for water recreation
e. promoting their use for transport LDF preparation
C) Within LDFs boroughs should identify any local opportunities for increasing the local distinctiveness and use of their parts of the Blue Ribbon Network.

Draft London Plan
The current 2016 consolidation Plan is still the adopted Development Plan. However, the Draft London Plan is a material consideration in planning decisions. It gains more weight as it moves through the process to adoption, however the weight given to it is a matter for the decision maker. It is anticipated that new plan will be fully adopted in Autumn 2019. Those draft policies of relevance to ecology are detailed below:

Policy G1 Green infrastructure
A. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.
B. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
C. Development Plans and Opportunity Area Planning Frameworks should:
1) identify key green infrastructure assets, their function and their potential function;
2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

Policy G5 Urban Greening
A. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
B. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on set factors, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.

Policy G6 Biodiversity and Access to Nature
A. Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites.
B. In developing Development Plan policies, boroughs should:

1) use the relevant procedures to identify SINCs and green corridors. When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board
2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
3) seek opportunities to create habitats that are of particular relevance and benefit in an urban context
4) include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations
5) ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed.

C. Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts:
   1) avoid adverse impact to the special biodiversity interest of the site
   2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site
   3) seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.
D. Biodiversity enhancement should be considered from the start of the development process.
E. Proposals which create new or improved habitats that result in positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites.

Policy G7 Trees and Woodlands

A. Trees and woodlands should be protected, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
B. In their Development Plans, boroughs should:
   1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site
   2) identify opportunities for tree planting in strategic locations.
C. Development proposals should ensure that, wherever possible, existing trees of quality are retained. If it is imperative that trees have to be removed, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Policy SI17 Protecting London's Waterways

A. Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect the foreshore and increase the heritage and habitats value, should be supported if appropriate. Development proposals to impound and constrain waterways should be refused.
B. Development proposals should support and improve the protection of the distinct open character and heritage of waterways.
C. Development proposals into the waterways, including permanently moored vessels and development into the waterways should generally only be supported for water-related uses.
D. Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character and environment and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctiveness.
E. On-shore power at water transport facilities should be provided at wharves and residential moorings to help reduce air pollution.

3.4 LOCAL PLANNING POLICY

https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/local_plan_review

Local Plan

The new Local Plan for the borough was adopted in July 2018, which replaces previous policies within the Core Strategy and Development Management Plan. The Plan sets out policies and guidance for the development of the borough over the next 15 years. Policies of relevance to ecology are detailed below:

Policy LP 12 Green Infrastructure

Green infrastructure is a network of multi-functional green spaces and green features, which provides multiple benefits for people, nature and the economy.

A. To ensure all development proposals protect, and where opportunities arise enhance, green infrastructure, the following will be taken into account when assessing development proposals:
    a) the need to protect the integrity of the green spaces and features that are part of the wider green infrastructure network; improvements and enhancements to the green infrastructure network are supported;
    b) its contribution to the wider green infrastructure network by delivering landscape enhancement, restoration or re-creation;
    c) incorporating green infrastructure features, which make a positive contribution to the wider green infrastructure network.
B. The hierarchy of open spaces, as set out in the table below, will be protected and used in accordance with the functions shown.

Public Open Space Hierarchy:

Type and size	Main function
Regional Parks (400 ha+)	Large areas, corridors or networks of open space, the majority of which will be publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. Offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.
Metropolitan parks (60 – 400 ha)	Large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level, are readily accessible by public transport and are managed to meet best practice quality standards.
District parks (20 – 60 ha)	Large areas of open space that provide a landscape setting with a variety of natural features providing a wide range of activities, including outdoor sports facilities and playing fields, children's play for different age groups and informal recreation pursuits as well as visual amenity.
Local parks (2 – 20 ha)	Providing for court games, children's play, sitting out areas, visual amenity and nature conservation areas.
Small local parks and open spaces (less than 2 ha)	Gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas as well as visual amenity.
Pocket Parks (under 0.4 ha)	Small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment as well as visual amenity.
Linear open spaces (variable)	Open spaces and towpaths alongside the Thames and other waterways; paths, disused railways; nature conservation areas; and other routes that provide opportunities for informal recreation. Often characterised by features or attractive areas which are not fully accessible to the public but contribute to the enjoyment of the space and visual amenity.

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.

Policy LP 16 Trees, Woodlands and Landscape

A. The Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.
B. To ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals, will:

Trees and Woodlands

1. resist the loss of trees, including aged or veteran trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value; or felling is for reasons of good arboricultural practice; resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland;
2. resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value; the Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees;
3. require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT);
4. require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species is encouraged where appropriate;
5. require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations).

The Council may serve Tree Preservation Orders or attach planning conditions to protect trees considered to be of value to the townscape and amenity and which are threatened by development.

Landscape

1. require the retention of important existing landscape features where practicable;
2. require landscape design and materials to be of high quality and compatible with the surrounding landscape and character; and
3. encourage planting, including new trees, shrubs and other significant vegetation where appropriate.

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.

Policy LP 18 River corridors

A. The natural, historic and built environment of the River Thames corridor and the various watercourses in the borough, including the River Crane, Beverley Brook, Duke of Northumberland River, Longford River and Whitton Brook, will be protected. Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment.

Thames Policy Area

B. Development proposals within the Thames Policy Area should respect and take account of the special character of the reach as set out in the Thames Landscape Strategy and Thames Strategy as well as the Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans.

   Developments alongside and adjacent to the River Thames should ensure that they establish a relationship with the river, maximise the benefits of its setting in terms of views and vistas, and incorporate uses that enable local communities and the public to enjoy the riverside, especially at ground level in buildings fronting the river.

Public Access

C. All development proposals alongside or adjacent to the borough's river corridors should:
   a) Retain existing public access to the riverside and alongside the river; and
   b) Enhance existing public access to the riverside where improvements are feasible; or
   c) Provide new public access to the riverside where possible, and maintain existing points of access to the foreshore subject to health and safety considerations. There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside.
   d) Provide riparian life-saving equipment where required and necessary.

River Thames public riverside walk

D. All development proposals adjoining the River Thames are required to provide a public riverside walk, including for pedestrians and cyclists, which will contribute to the overarching aim of providing a continuous publicly accessible riverside walk. For major developments, applicants will be expected to work with adjoining landowners in case ownership issues would prevent public access. Riverside uses, including river-dependent and river-related uses
E. The Council will resist the loss of existing river-dependent and river-related uses that contribute to the special character of the River Thames, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs.

This will be achieved by:

1. resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses unless it can be demonstrated that no other river-dependent or river-related use is feasible or viable;
2. ensuring development on sites along the river is functionally related to the river and includes river dependent or river-related uses where possible, including gardens which are designed to embrace and enhance the river, and be sensitive to its ecology;
3. requiring an assessment of the effect of the proposed development on the operation of existing river dependent uses or riverside gardens on the site and their associated facilities on- and off-site; or

requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;
4. ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established river-related and river-dependent uses;
5. requiring setting back development from river banks and existing flood defences along the River Thames.

Site Allocations
The survey area has been identified for development as part of the Local Plan:

SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton
Appropriate land uses include business (B1), employment generating and other commercial or social and community infrastructure uses. The Building of Townscape Merit should be retained and a pedestrian link should be provided through the site.

The site is within the designated Hampton Village local centre.

- The site is within the Hampton Village Conservation Area and the whole building is a Building of Townscape Merit and should be retained.
- The site was declared surplus to requirements by the Metropolitan Police in 2015 and is now in private ownership. It is recognised that a planning application for 28 residential units has been granted permission.
- The evidence suggests there is a need for employment generating and other commercial or social infrastructure uses in this area.
- Only if other employment generating, commercial and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- Any proposed scheme should create a pedestrian link through the site between Station Avenue and Beveree Sports Ground.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Village Planning Guidance SPD for Hampton.

4. DESK STUDY RESULTS

4.1 INTRODUCTION

The data search was carried out on 1st August 2019 by Greenspace Information for Greater London CIC All relevant ecological data provided by the consultees was reviewed and the results from these investigations are summarised in Sections 4.2 to 4.4. Selected data are provided in Appendix 1.

4.2 NATURE CONSERVATION SITES

Statutory and non-statutory nature conservation sites located in proximity to the survey area are summarised in Table 4.1.

Site Name	Designation	Proximity to Survey Area	Description
European Statutory Sites			
South West London Waterbodies/ Kempton Park Reservoirs SSSI	RAMSAR/SPA/ SSSI/LNR	1.6 km north-west	Kempton Park Reservoirs comprise two artificially embanked basins to the northeast of Kempton Park Racecourse near Hampton. In addition to the nationally important numbers of gadwall *Mareca strepera,* the site also supports significant numbers of wintering shoveler *Anas clypeata.* Management of the site consists of refuge island, deep water channels and reed bed installations. Regular breeding waders on the East Reservoir include lapwing *Vanellus vanellus* redshank *Tringa botanus* ringed plover *Charadrius hiaticula* and little ringed plover *Charadrius dubius*. Avocet *Recurvirostra avosetta* bred on the East Reservoir in 1996 representing the first successful inland breeding of this species in the British Isles. The wooded setting of Red House Reservoir is favoured by feeding bats; supporting noctule *Nyctalus noctula* serotine *Eptesicus serotinus* daubenton's bat *Myotis daubentoni* and pipistrelle *Pipistrellus pipistrellus*
UK Statutory Sites			
Knight and Bessborough Reservoirs	SSSI	1.76 km south-west	Knight and Bessborough reservoirs consist of two connected artificially embanked water storage reservoirs which support a variety of waterfowl, including nationally important numbers of shoveler *Anas clypeata*. Wintering gadwall *Anas Strepera,* cormorant *Phalacrocorax carbo* and goldeneye *Bucephala clangula* can also be observed
Oak Avenue Hampton	LNR	1.95 km north-west	A 1.85 ha site comprising an area of re-landscaped greenhouses now featuring native hedges, footpaths and a wildflower meadow to encourage wildlife. A length of the hedge was laid in the traditional manner early in 2002.
Bushy Park and Home Park	SSSI	500 m east	Bushy Park and Home Park SSSI is of special interest for its nationally important saproxylic (dead and decaying wood associated) invertebrate assemblage, population of veteran trees and acid grassland communities. These features occur within and are supported by the wider habitat mosaic. The saproxylic invertebrates include those associated with heartwood decay, bark and sapwood decay and with fungal fruiting-bodies found within the veteran trees which are located throughout the site. Lowland dry acid grassland communities comprise sheep's fescue *Festuca ovina,* common bent *Agrostis capillaris and* sheep's sorrel *Rumex acetosella.*

Table 4.1: Summary of Nature Conservation Sites (continues)

Site Name	Designation	Proximity to Survey Area	Description
Non-statutory Sites			
Beveree Wildlife Site	Local	Adjacent to Site	0.6 ha site comprising a bank of mixed woodland runs along the edge of Hampton Football Club's ground, including scots pine *Pinus sylvestris*, ash *Fraxinus excelsior*, oak *Quercus robur*, sweet chestnut *Castanea sativa* and cherry *Prunus sp*. A dense understorey includes elder *Sambucus nigra*, privet *Ligustrum ovalifolium* mock-orange *Philadelphus sp*., holly *Ilex aquilifolium* and regenerating elm. The ground flora is dominated by ivy *Hedera helix*, cow parsley *Anthriscus sylvestris* and bramble *Rubus fruticosus agg*., with a fine display of bluebells *Hyacinthoides* sp. in spring.
Hampton Water Treatment Works	Borough Grade I	240 m south	41.07 ha site adjacent to Stain Hill and Sunnyside Reservoirs, this large water works includes filter beds, some larger water storage beds, old Victorian buildings, herb-rich grasslands, bare ground and wasteland. The large areas of open water support many birds, particularly in winter. It is the grasslands surrounding the filter beds and buildings however, which makes the site so special. They are among the most herb-rich grasslands in the borough. A large population of the London rarity wild clary *Salvia verbenaca* is present throughout the grassland, which also contains several other scarce London species often associated with chalk grassland, such as; vervain *Verbena officinalis*, burnet saxifrage *Pimpinella saxifraga*, bee orchid *Ophrys apifera*, pyramidal orchid *Anacamptis pyramidalis*, and salad burnet *Sanguisorba minor*,
River Thames and Tidal Tributaries	Metropolitan	290 m south	A 2311.29 ha site comprising the River Thames and its associated tidal creeks and rivers forming several valuable habitats unique to this area of London. The mudflats, shingle beach, inter-tidal vegetation, islands and river channel itself support many species from freshwater, estuarine and marine communities rare in London and of particular importance for wildfowl and wading birds. The river walls also provide important feeding areas for the nationally rare and specially protected black redstart *Phoenicurus ochruros*. The Thames is extremely important for fish, with over 100 species now present. Many of the tidal creeks are important fish nurseries, including for several nationally uncommon species such as smelt *Osmeridae* sp. Further downstream are areas of saltmarsh, a very rare habitat in London, where there is a small population of the nationally scarce marsh sow-thistle *Sonchus palustris.*

Table 4.1 (continued): Summary of Nature Conservation Sites (continues)

Site Name	Designation	Proximity to Survey Area	Description
Bushy Park and Home Park	Metropolitan	540 m east	A 644.54 ha site comprising two adjacent Royal Parks yielding a large area of old parkland habitat representing some of the best acid grassland in London and a variety of interesting wetlands. The acid grasslands support numerous locally uncommon plants, including small cudweed *Filago minima*, subterranean clover *Trifolium subterraneum*, spring and prickly sedges *Carex caryophyllea*, *C. muricata ssp. lamprocarpa* and several nationally scarce species; chamomile *Chamaemelum nobile* and the only sizeable population in south-east England of autumn squill *Scilla autumnalis*. The site also supports water vole *Arvicola amphibious* and rusty click-beetle *Elater ferrugineus.*
Hampton Cemetery	Local	800 m north-west	A 1.07 ha site comprising this a relatively young cemetery, which contains fine acid grassland in and around the graves. Select species includes selfheal *Prunella vulgaris*, field bindweed *Convolvulus arvensis*, oxeye daisy *Leucanthemum vulgare*, bird's-foot-trefoil *Lotus corniculatus*, creeping cinquefoil *Potentilla reptans* and germander speedwell *Veronica chamaedrys.* An avenue of cherries *Prunus sp.* lines the main path, which runs north to south through the site, while common lime *Tilia x europaea*, cedars *Cedrus spp*., red oak *Quercus rubra*, holly *Ilex aquilifolium* and yew *Taxus baccata* have also been planted.
Longford River in Richmond	Borough Grade II	840 m north-east	The 5.78 ha site comprising a section of the Longford River in the Richmond borough which despite its vertical banks, supports a diverse range of vegetation, including hemlock water-dropwort *Oenanthe crocata*, marsh woundwort *Stachys palustris*, water dock *Rumex hydrolapathum,* lesser pond-sedge *Carex riparia*, pondweed *Potamogeton pectinatus* and hornwort *Ceratophyllum demersum* . The river holds good populations of fish and adjacent ditches support further wetland plants, including hemp-agrimony *Eupatoria cannabina*, celery-leaved buttercup and *Ranunculus sceleratus*

Key:
SPA: Special Protection Area
SSSI: Site of Special Scientific Interest
RAMSAR: Site listed on The Convention on Wetlands of International Importance (Ramsar Convention)
LNR: Local Nature Reserve
Metropolitan: Sites of Metropolitan Importance
Borough Grade I: Sites of Borough Grade I Importance
Borough Grade II: Sites of Borough Grade II Importance
Local: Sites of Local Importance

Table 4.1 (continued): Summary of Nature Conservation Sites

Not only are two Sites of Special Scientific Interest (SSSIs) located within a 2 km radius of the survey area, but the survey area itself falls within the SSSI Impact Risk Zone for Bushy Park and Home Park which is located 500 m east

4.3 PROTECTED / NOTABLE SPECIES

Table 4.2 and the following text provide a summary of protected and notable species records within a 1 km radius of the study area. It should be noted that the absence of records should not be taken as confirmation that a species is absent from the search area.

Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Species of Principal Importance?	Legislation / Conservation Status
Mammals- bats					
Unidentified bat *Vespertilionidae* sp.	93	2002	110 m south-east	#	#, Local
Serotine bat *Eptesicus serotinus*	7	2004	610 m south-east	-	ECH 4, WCA 5, WCA 6, Local
Natterer's bat *Myotis nattereri*	9	2014	610 m south east	-	ECH 4, WCA 5, WCA 6, Local
Noctule *Nyctalus noctula*	11	2017	610 m south-east	✓	ECH 4, WCA 5, WCA 6, Local
Common pipistrelle *Pipistrellus pipistrellus*	14	2017	610 m south-east	-	ECH 4, WCA 5, WCA 6, Local
Soprano pipistrelle *Pipistrellus pygmaeus*	24	2017	610 m south-east	✓	ECH 4, WCA 5, WCA 6, Local
Daubenton's bat *Myotis daubentonii*	9	2016	690 m south west	-	ECH 4, WCA 5, WCA 6, Local
Nathusius's Pipistrelle *Pipistrellus nathusii*	2	2016	690 m south-west	-	ECH 4, WCA 5, WCA 6, Local
Pipistrelle *Pipistrellus* sp.	4	2004	800 m south-west	#	ECH 4, WCA 5, WCA 6, Local
Brown long-eared bat *Plecotus auritus*	2	2004	960 m north-east	✓	ECH 4, WCA 5, WCA 6, Local
Unidentified bat *Chiroptera* sp.	7	2018	1 km north	#	#, Local
Mammals - other					
Badger *Meles meles*	2	2017	†	-	WCA 6, PBA, Local
Red Squirrel *Sciurus vulgaris*	1	2017	1 km north	✓	WCA 5, WCA 6
Hedgehog *Erinaceus europaeus*	108	2018	110 m south east	✓	WCA 6, Local
Water vole *Arvicola amphibius*	33	2004	850 m east	✓	WCA 5, Local
Common shrew *Sorex araneus*	11	2018	860 m east	-	WCA 6
Amphibians					
Common toad *Bufo bufo*	25	2015	110 m south east	✓	WCA 5 S9(5), Local
Common frog *Rana temporaria*	121	2018	110 m south east	-	WCA 5 S9(5), Local
Reptiles					
Slow worm *Anguis fragilis*	1	2012	870 m north-east	✓	WCA 5 S9(1) WCA 5 S9(5)
Grass snake *Natrix natrix*	16	2018	890 m east	✓	WCA 5 S9(1) WCA 5 S9(5)

Table 4.2: Summary of Protected/Notable Species Records Within 1 km of Survey Area (continues)

Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Species of Principal Importance?	Legislation / Conservation Status
Birds					
Cetti's warbler *Cettia cetti*	1	2015	†	-	WCA1i
Peregrine *Falco peregrinus*	3	2004	†	-	WCA1i
Eurasian hobby *Falco subbuteo*	51	2015	†	-	WCA1i
Barn owl *Tyto alba*	1	2018	†	-	WCA1i
Brambling *Fringilla montifringilla*	5	2013	320 m north-east	-	WCA1i
Fieldfare *Turdus pilaris*	16	2017	330 m north-east	-	WCA1i
Marsh harrier *Circus aeruginosus*	1	2003	530 m north-west	-	WCA1i
Firecrest *Regulus ignicapilla*	2	1999	530 m north-west	-	WCA1i
Redwing *Turdus iliacus*	37	2017	530 m north-west	-	WCA1i
Mediterranean gull *Larus melanocephalus*	3	2011	530 m north-west	-	WCA1i
Kingfisher *Alcedo atthis*	12	2016	700 m south west	-	WCA1i, Local
Little ringed plover *Charadrius dubius*	2	2001	700 m south-east	-	WCA1i
Goldeneye *Bucephala clangula*	6	2013	710 m south-west	-	WCA 1i
Green sandpiper *Tringa ochropus*	7	2013	710 m south-west	-	WCA1i
Pintail *Anas acuta*	1	2001	950 m north-east	-	WCA1ii
Crossbill *Loxia curvirostra*	1	2012	950 m north-east	-	WCA1i
Red kite *Milvus milvus*	2	2012	950 m north-east	-	WCA1i
Invertebrates					
Stag beetle *Lucanus cervus*	327	2018	110 m west	✓	ECH 2, WCA 5 S9(5), Local

Key:
#: Dependent on species.
†: Records are confidential and therefore proximity is not provided within the report.

ECH 2: Annex II of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest whose conservation requires the designation of Special Areas of Conservation.
ECH 4: Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest in need of strict protection.
PBA: Protection of Badgers Act 1992.

WCA 1i: Schedule 1 Part 1 of Wildlife and Countryside Act 1981 (as amended). Birds protected by special penalties at all times.
WCA 1ii: Schedule 1 Part 2 of Wildlife and Countryside Act 1981 (as amended). Birds protected by special penalties during close season.
WCA 5: Schedule 5 of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds).
WCA 5 S9(1): Schedule 5 Section 9(1) of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). Protection limited to intentional killing, injury or taking.
WCA 5 S9(5): Schedule 5 Section 9(5) of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). Protection limited to selling, offering for sale, processing or transporting for purpose of sale, or advertising for sale, any live or dead animal, or any part of, or anything derived from, such animal.
WCA 6: Schedule 6 of Wildlife and Countryside Act 1981 (as amended). Animals which may not be killed or taken by certain methods.

Key (continued):
Species of Principal Importance: Species of Principal Importance for Nature Conservation in England
Local: Species of Principal Importance in Richmond Upon Thames

Note. This table does not include reference to the Berne Convention (Convention on the Conservation of European Wildlife and Natural Habitats), the Bonn Convention on the Conservation of Migratory Species of Wild Animals or the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Table 4.2 (continued): Summary of Protected/Notable Species Records Within 1 km of Survey Area

Birds

The desk study provided 453 records of 17 species of birds listed as Species of Principle Importance, including but not exclusive to: lesser spotted woodpecker *Dendrocopos minor,* reed bunting *Emberiza schoeniclus*, house sparrow *Passer domesticus*, song thrush *Turdus philomelos* and dunnock *Prunella modularis*.

The desk study further provided 67 records of 8 species of bird listed under the RSPB Red list including but not exclusive to: mistle thrush *Turdus viscivorus,* grey wagtail *Motacilla cinereal*, pochard *Aythya ferina*

The desk study further provided 376 records of 21 species of bird listed under the RSPB Amber List including but not exclusive to: shelduck *Tadorna tadorna*, common tern *Sterna hirundo*, mute swan *Cygnus olor*, stock dove *Columba oenas* and swift *Apus apus*.

Invertebrates

The desk study provided 130 records of 25 species of invertebrates listed as Species of Principle Importance including but not exclusive to: the moths – cinnabar *Tyria jacobaeae,*small square spot *Diarsia rubi,* shoulder-striped wainscot *Leucania comma* and rosy rustic *Hydraecia micacea* and the butterfly – small heath *Coenonympha pamphilus.*

Plants

The desk study provided 6 records of chamomile *Chamaemelum nobile* which is listed as a Species of principle Importance.

4.4 INVASIVE SPECIES

Table 4.3 provides a summary of invasive species records within a 1 km radius of the study area. It should be noted that the absence of records should not be taken as confirmation that a species is absent from the search area.

Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Legislation / Conservation Status
Canadian waterweed *Elodea canadensis*	1	2002	20 m east	WCA 9, LISI 5
False-acacia *Robinia pseudoacacia*	3	1999	450 m north-east	LISI 4
Cotoneaster *Cotoneaster fridgidus*	2	2007	580 m north-east	LISI 2
Butterfly-bush *Buddleia davdii*	8	2014	610 m north	LISI 3
Cotoneaster *Cotoneaster* sp.	1	1999	610 m north	LISI 2, WCA 9
Green alkanet *Pentaglottis sempervirens*	2	1999	610 m north	LISI 6
Cherry laurel *Prunus lauroceraus*	5	2009	610 m north	LISI 3
Turkey oak *Quercus cerris*	20	2011	610 m north-east	LISI 5
Snowberry *Symphoricarpos albus*	1	1999	610 m north	LISI 2
Japanese knotweed *Fallopia japonica*	1	1999	620 m south-east	LISI 3, WCA 9

Table 4.3: Summary of Invasive Species Records Within 1 km of Survey Area (continues)

Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Legislation / Conservation Status
Parrot's-feather *Myriophyllum aquaticum*	1	2002	660 m north	LISI 3, WCA 9
Tree-of-heaven *Ailanthus altissima*	2	1999	700 m south-west	LISI 3
Goat's-rue *Galega officinalis*	3	2013	700 m south-west	LISI 4
Himalayan balsam *Impatiens glandulifera*	1	1999	740 m south-west	LISI 3, WCA 9
Orange balsam *Impatiens capensis*	3	2004	810 m east	LISI 2
Cotoneaster *Cotoneaster horizontalis*	1	1999	850 m north-west	WCA 9, LISI 2
Spanish bluebell *Hyacinthoides hispanica*	1	1999	850 m north-west	LISI 4
Least duckweed *Lemna minuta*	2	2014	860 m north-east	LISI 4
Water fern *Azolla filiculoides*	3	2011	900 m north-east	LISI 2, WCA 9
Evergreen oak *Quercus ilex*	7	2011	960 m north-east	LISI 5
Rhododendron *Rhododendron ponticum*	2	2004	970 m east	LISI 2, WCA 9
Key: WCA9: Schedule 9 of Wildlife and Countryside Act 1981 (as amended). Invasive, non-native, plants and animals. LISI: London Invasive Species Initiative				

Table 4.3 (continued): Summary of Invasive Species Records Within 1 km of Survey Area

5. PHASE 1 HABITAT SURVEY

5.1 INTRODUCTION

The results of the Phase 1 Habitat Survey are presented in the following sections. An annotated Phase 1 Habitat Survey Drawing (Drawing C150446-01-01) is provided in Chapter 8. This drawing illustrates the location and extent of all habitat types recorded on site. Any notable features or features too small to map are detailed using target notes. Photographs taken during the field survey are presented in Chapter 9.

The survey was carried out on 01st August 2019 by Harry Stone (Ecological Project Officer) and Gemma Luckhurst (Ecological Project Officer) Table 5.1 details the weather conditions at the time of the survey.

Parameter	Condition
Temperature (ºC)	24
Cloud (%)	0
Wind (Beaufort)	None
Precipitation	F0-1

Table 5.1: Weather Conditions During Field Survey

5.2 SURVEY CONSTRAINTS AND LIMITATIONS

No significant constraints or limitations were experienced on the day the walkover survey was taken.

5.3 HABITATS

The following habitat types were recorded on site during the field survey:

- Buildings;
- Hardstanding;
- Introduced Shrub; and,
- Scattered Trees,

These habitats are described below. They are ordered alphabetically, not in order of ecological importance.

Buildings
The main building on site was a two-three storey Victorian era former police station, with brick walls and slate tiled roofs. To the north of the site were a series of one-two storey garages and associated office rooms, which were also brick-built but had a mix of corrugated metal and clay tile roofs. A small storage building was situated in the southwest of the site, incorporated into the brick wall. The buildings were generally in a good state of repair, however several features such as gaps in brickwork and missing mortar made them suitable for roosting bats. A disused birds nest was observed above one of the roller doors during the survey.

Hardstanding
A large area of concrete dominated the site, which was utilized as a car parking area. Encroaching vegetation was noted, with species such as hairy willowherb Epilobium hirsutum, ragwort Jacobaea vulgaris, common thistle Cirsium vulgare, red valerian Centranthus ruber, and common dandelion Taraxacum officinale (Plate 9.2). Patches of invasive butterfly bush *Buddleja davidii*, were also identified within this habitat (Plate 9.3).

Introduced Shrub
Small area of introduced shrub is located at the southern border. This shrub area consists of: red valerian *Centranthus ruber,* ivy *Hedera,* wilsons honeysucke *Lonicera nitida,* dog-rose *Rosa canina* and the invasive species cotoneaster *Contoneaster fridigidus* (Plate 9.4). Potted plants were also present throughout the site adjacent to current residential units.

Scattered Trees
Field maple *Acer campestre*, was recorded within the car parking area. Beyond the brick wall near the the southern site boundary was a large section of introduced shrub which contained a mature scots pine *Pinus sylvestris* and a cyptress tree *Cupressus sp*.

5.4 FAUNA

During the survey field signs of faunal species were recorded. The time of year at which the survey is undertaken will affect species or field signs directly recorded during the survey.

Invertebrates
Meadow brown *Maniola jurtina,* and small white *Pieris rapae* butterflies were observed on site on the walkover survey.

5.5 INVASIVE PLANT SPECIES

Butterfly bush *Buddleja davidii* and cotoneaster *Cotoneaster fridgidus* were observed on site at the time of the walkover survey.

6. DISCUSSIONS AND CONCLUSIONS

6.1 SUMMARY OF PROPOSALS

This assessment is required to inform a planning application associated with the redevelopment of the site into a care home facility. Most of Building 1 is to be retained, however all other buildings are scheduled for removal, including a significant proportion of Building 1. In the footprint of the removed buildings a care home is to be built consisting of residential rooms, dining rooms and associated facilities. Approximately fourteen car parking spaces are to be built along the site's eastern boundary and the development is to incorporate two garden areas.

6.2 NATURE CONSERVATION SITES

The desk study exercise identified one European statutory site within 5 km of the survey area, three UK statutory sites within 2 km and six non-statutory sites within 1 km. The site is not located within 10 km of a statutory site designated for bats. The significance of these sites to the proposed development is discussed below.

European Statutory Sites
One European statutory site fell within a 5 km radius of the proposed site, comprising a RAMSAR/SPA/SSSI and LNR. Due to the large distance between the proposed site and this European statutory site, 1.6 km, and the relatively built up nature of the intervening space, any potential impacts on this nature conservation site as a result of the development would be considered negligible.

UK Statutory Sites
Three UK statutory sites fell within a 2 km radius of the proposed development site; comprising the Knight and Bessborough reservoir and Bushy park and Home park SSSI's and the Oak Avenue Hampton LNR. Due to the relative distance between these sites, all over 500 m, and the small-scale nature of the proposed development, any potential impacts on this nature conservation site as a result of the development would be considered negligible.

The nature and scale of the proposed development does not fall within any of the SSSI Impact Risk Zone categories (please refer to Appendix 1); hence the potential for impacts on the SSSI's in the locality are considered negligible.

Non-Statutory Sites
The Beveree Wildlife site, designated with 'local' importance status, is situated directly adjacent to the proposed development site. This site represents an important parcel of mixed woodland and ground flora which is elsewhere unprovided in the locality. Hence a recommendation regarding construction management has been made in Section 7.1.

The remaining five Non-statutory sites that fell within a 1 km radius of the proposed development site are located at a large enough distance from the site, all >240 m, and with intervening space already comprised of residential developments, hence any potential impact form the proposed development would be considered negligible.

6.3 HABITATS

The ecological importance of the habitats present on site is determined by their presence on the list of Habitats of Principal Importance in England and on the Local BAP. It also takes into account the intrinsic value of the habitat. Those habitats which are considered to be of intrinsic importance and have the potential to be impacted by the site proposals are highlighted as notable considerations.

A discussion of the implications of the site proposals with regard to the habitats present on site is provided in the text below. A separate discussion of the value of the habitats on site to protected or notable species is provided in Section 6.4.

Buildings, Hardstanding, Introduced Shrub and Scattered Trees
The habitats on site are not deemed to be notable as they do not provide any unique resources that the surrounding area off site cannot also provide. Therefore, it is unlikely that local species are dependent on these site habitats, hence any potential impacts from the proposed development are considered negligible.

6.4 PROTECTED/NOTABLE SPECIES

The following paragraphs consider the likely impact of the site proposals on protected or notable species. This is based on those species highlighted in the desk study exercise (Chapter 4) and other species for which potentially suitable habitat occurs within or adjacent to the survey area.

Mammals
Bats
The desk study provided 176 records of at least eight different species of bat within a 1 km radius of the survey area. The closest record was located 110 m south-east of the proposed development. The site itself is deemed high potential for roosting bats due to both buildings yielding multiple features. The trees toward the south of the site also provide suitable foraging habitats, hence recommendations regarding this species have been made in Section 7.3.

Badger and Hedgehog
The desk study provided two records of badger and 108 records of hedgehog within a 1 km radius of the site. There was no suitable set building habitat for badgers, however the surrounding grassland and tree-banks next to the site do provide suitable foraging opportunities for both badger and hedgehog. Furthermore, the immediate proximity of the adjacent local wildlife site increases the likelihood that badgers and hedgehog may frequent the site for commuting purposes. Hence recommendations regarding terrestrial mammals have been made in Section 7.3.

Water Vole
The desk study provided 33 records of water vole within a 1 km radius of the site; however, these records were situated 850 m eastwards. The site itself yields no connection to a suitable watercourse hence it is deemed unlikely that water voles use the site and they are not deemed a notable consideration.

Amphibians
The desk study provided 146 records of two species of common amphibian within 1 km radius of the survey area. The site itself is not suitable habitat for amphibians with no suitable terrestrial habitat due to the majority exposed hardstanding nature. There are no ponds situated on site for breeding and consultation of ordinance survey and digital imagery reveal no ponds within a 500 m radius of the site hence no suitable breeding grounds are located nearby. Therefore, amphibians are not deemed notable and are considered no further.

Reptiles
The desk study revealed 17 records of two species of reptile within 1 km radius of the site. The site itself is not suitable of reptiles comprising of mostly exposed hardstanding areas leaving limited area for foraging, basking and shelter. Hence, reptiles are not deemed a notable and are considered no further.

Birds
The desk study provided 1,047 records of 63 bird species within 1 km of the site. 17 of these birds are listed as WCA 1i, yet due to the relative proximity of the optimal habitat provided by the South West London Waterbodies/ Kempton Park Reservoirs SSSI RAMSAR site it is considered unlikely that these high priority wintering birds nest using this site. However, the site provides suitable habitat for local nesting birds with a disused birds nest observed in Building 2 and ivy habitat on the southern wall of Building 2, plus suitable vegetation for nesting on site. Hence recommendations regarding nesting birds have been made in Section 7.3.

Invertebrates

Stag beetle

The desk study provided 327 records of stag beetle within a 1 km radius of the site. The site itself provides no suitable habitat for stag beetle as it lacks decaying or deadwood, hence it is considered unlikely that stag beetles are using the site and it is considered no further.

Other – Butterfly and Moth

The desk study provided 130 records of 25 species of invertebrates listed as Species of Principle Importance within a 1 km radius of the study area. The habitat itself provides sub-optimal habitat for invertebrates with little foodplants present and a majority hardstanding habitat. Hence, invertebrate populations are not deemed notable and are considered no further.

Plants

The desk study provided one species of principle importance – chamomile *Chamaemelum nobile*, however this was not present on site during the walkover survey and notable plants are unlikely to be present in the habitats on site, hence they are considered no further.

Other Species

The following protected species are not considered to be material considerations due to the lack of desk study records and absence of suitable habitats within the development site and its surroundings: dormouse *Muscardinus avellanarius*, water vole *Arvicola amphibius*, white-clawed crayfish *Austropotamobius pallipes*

Summary

Species considered to be of relevance to the proposed development are summarised in Table 6.2.

Species / Species Group	Species of Principal Importance?	Summary of Potential Impacts
Bats	#	loss of suitable habitat, direct harm or injury.
Badger	-	direct harm or injury/disturbance
Hedgehog	✓	direct harm or injury/disturbance
Birds	-	loss of suitable habitat, direct harm or injury/disturbance

Table 6.1: Summary of Potential Impacts on Notable Species

6.5 INVASIVE PLANT SPECIES

The desk study provided 70 records of 21 invasive species of plant within a 1km radius of the survey area. Two of these species – butterfly-bush Buddleja davidii and cotoneaster Cotoneaster frigidus were observed on site during the walkover survey. Butterfly-bush is listed as LISI category 3 and cotoneaster is listed as LISI category 2. To ensure these species are not caused to spread in the wild, a recommendation regarding sensitive clearance of these habitats has been made in Section 7.4.

7. RECOMMENDATIONS

All recommendations provided in this section are based on Middlemarch Environmental Ltd's current understanding of the site proposals, correct at the time the report was compiled. Should the proposals alter, the conclusions and recommendations made in the report should be reviewed to ensure that they remain appropriate.

The ecological mitigation hierarchy should be applied when considering development which may have a significant effect on biodiversity. The ecological mitigation hierarchy, as set out in the National Planning Policy Framework (NPPF), and the National Planning Practice Guidance (NPPG) should follow these principles:

- **Avoidance** – development should be designed to avoid significant harm to valuable wildlife habitats and species.
- **Mitigation** – where significant harm cannot be wholly or partially avoided, it should be minimised by design or through the use of effective mitigation measures.
- **Compensation** – where, despite whatever mitigation would be effective, there would still be significant residual harm, as a last resort, compensation should be used to provide an equivalent value of biodiversity.

7.1 NATURE CONSERVATION SITES

The following recommendation is made regarding nature conservation sites:

R1 **Beveree Wildlife Site**: The proposed works could potentially indirectly impact upon Beveree Wildife Site which is designated as a 'Local' site of importance in the Borough of Richmond Upon Thames. Therefore, a Construction Ecological Management Plan (CEcMP) should be compiled for the site. The aim of the CEcMP is to minimise the potential impact of the construction phase of the development on the existing ecology of the site and off site receptors, and ensure works proceed in accordance with current wildlife legislation. This document should be agreed with the Local Planning Authority ecologist prior to any works commencing.

7.2 HABITATS

The following recommendations are made regarding the habitats present on site:

R2 **Habitat Retention and Protection:** The development proposals should be designed (where feasible) to allow for the retention of existing notable habitats including.
Protection measures comprise:

- Trees/Hedgerows: Any trees/hedgerows on or overhanging the site, which are retained as a part of any proposed works should be protected in accordance with British Standard 5837: 2012 "Trees in relation to design, demolition and construction - recommendations". Protection should be installed on site prior to the commencement of any works on site.

If retention is not possible, appropriate replacement planting should be incorporated into the soft landscape scheme in accordance with the ecological mitigation hierachy. Only native and/or wildlife attracting species should be planted.

R3 **Biodiversity Enhancement:** In accordance with the provision of Chapter 15 of the National Planning Policy Framework (Conserving and Enhancing the Natural Environment) and Local Planning Policy, biodiversity enhancement measures should be incorporated into the landscaping scheme of any proposed development to work towards delivering net gains for biodiversity.

- Planting of habitats which will be of value to wildlife such as
  - native seed/fruit bearinf species
  - nectar-rich species to attract bees and butterflies
  - species which atteact flying inscects which will be value to foraging bats, for example: evening primrose *Oenothere biennis*, golden rod *Solidago virgayrea,* honeysuckle *Lonicera periclymenum* and fleabane *Pulicaria dysenterica.*

- Plant hedging plants where possible such as Hawthorn which has white blossoms in summer and is good for a variety of bee species. This will provide birds identified within and around the site with fruits for foraging.
- Provision of nesting/roosting habitat, such as installation of nest boxes for species such as house sparrow, dense scrub or native thicket for species such as song
- Choose winter and early spring flowering trees such as apple, wildcherry which are good for bees and other pollinators as they provide large amounts of blossom.

7.3 PROTECTED / NOTABLE SPECIES

To ensure compliance with wildlife legislation and the following recommendations are made:

R4 **Roosting Bats:** A Preliminary Bat Roost Assessment should be undertaken on buildings and suitable trees which may be impacted by the proposed development works. This assessment can be completed at any time of year. Dependent upon the results of the preliminary assessment, nocturnal emergence and dawn re-entry surveys could be required. Surveys should be undertaken in line with best practice survey guidelines (Collins, 2016), during the bat activity season. The bat activity season is considered to extend from May to September (inclusive), with the optimum survey period between mid-May and August (inclusive).

R5 **Terrestrial Mammals including Badger and Hedgehog:** Any excavations that need to be left overnight should be covered or fitted with mammal ramps to ensure that any animals that enter can safely escape. Any open pipework with an outside diameter of greater than 120 mm must be covered at the end of each workday to prevent animals entering/becoming trapped.

R6 **Nesting Birds:** Vegetation and building clearance should be undertaken outside the nesting bird season. The nesting bird season is weather dependent but generally extends between March and September inclusive (peak period March-August). If this is not possible then any vegetation/buildings to be removed or disturbed should be checked by an experienced ecologist for nesting birds immediately prior to works commencing. If birds are found to be nesting any works which may affect them should be delayed until the young have fledged and the nest has been abandoned naturally, for example via the implementation of an appropriate buffer zone (species dependent) around the nest in which no disturbance is permitted until the nest is no longer in use.

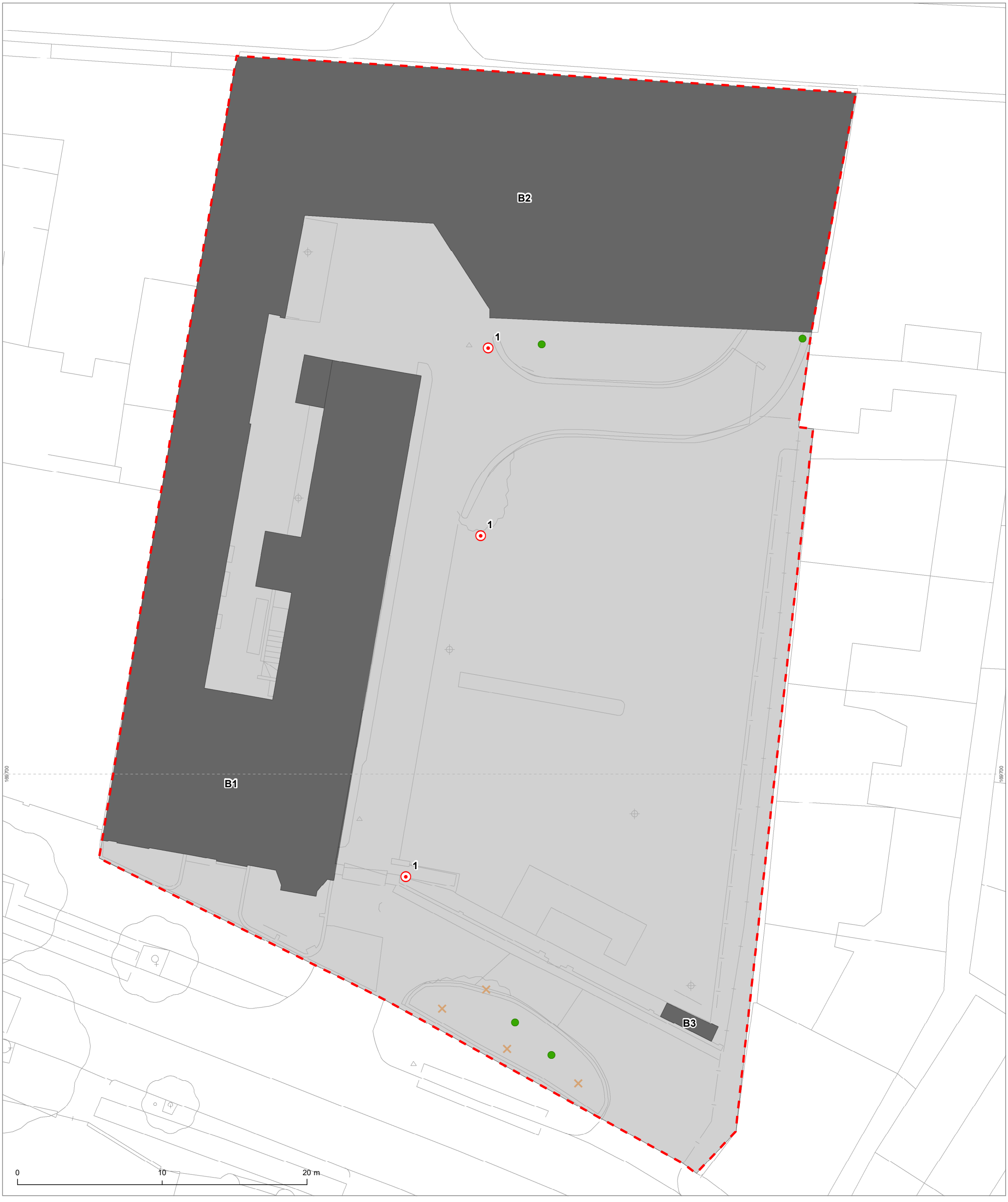
7.4 INVASIVE PLANT SPECIES

The following recommendation is made regarding invasive plant species:

R7 **Cotoneaster and Buddleia:** The works must not cause cotoneaster *Cotoneaster frigidus* or buddleia *Buddleja davidii* to spread in the wild. It must either be left in situ or removed with care during vegetation clearance and disposed of in an appropriate manner.

8. DRAWINGS

Drawing C150446-01-01 - Phase 1 Habitat Map



Legend

- Site boundary
- Scattered shrub
- Scattered tree
- Building
- Hardstanding
- Target note
  - 1 Buddleia

Project	66 Station Road, Hampton, London
Drawing	Phase 1 Habitat Map
Client	Meedhurst Project Management Ltd
Drawing Number	150446-01-01
Revision	00
Scale @ A3	1:250
Date	August 2019
Approved By	HS
Drawn By	GT

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E:admin@middlemarch-environmental.com

N

150446-01-01

9. PHOTOGRAPHS

Plate 9.1:
Buildings present on site

Plate 9.2:
Ephemeral vegetation colonising hardstanding habitat

Plate 9.3:
Hardstanding habitat dominating the site

Plate 9.4:
Area of introduced shrub dominated by invasive *Cotoneaster frigidus*

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APPENDICES

APPENDIX 1: Summary of Statutory Nature Conservation Sites

APPENDIX 2: Overview of Relevant Species Specific Legislation

APPENDIX 1

Summary of Statutory Nature Conservation Sites

Local Nature Reserves (England)

Reference
1009353
Name
KEMPTON NATURE RESERVES
Hectares
22.8
Hyperlink
https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1009353
Reference
1009055
Name
OAK AVENUE HAMPTON
Hectares
1.85
Hyperlink
https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1009055

Sites of Special Scientific Interest (England)

Name
Kempton Park Reservoirs SSSI
Reference
1007242
Natural England Contact
REBECCA HART
Natural England Phone Number
0845 600 3078
Hectares
25.29
Citation
2000385
Hyperlink
http://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s2000385
Name
Bushy Park and Home Park SSSI
Reference
1477753
Natural England Contact
REBECCA HART
Natural England Phone Number
0845 600 3078
Hectares
540.39
Citation
2000738
Hyperlink
http://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s2000738
Name
Knight & Bessborough Reservoirs SSSI
Reference
1007240
Natural England Contact
Conservation Delivery Team
Natural England Phone Number
0845 600 3078
Hectares
63.43
Citation
2000383
Hyperlink
http://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s2000383

Ancient Woodland (England)

No Features found

National Nature Reserves (England)

No Features found

SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)

1. DOES PLANNING PROPOSAL FALL INTO ONE OR MORE OF THE CATEGORIES BELOW?
2. IF YES, CHECK THE CORRESPONDING DESCRIPTION(S) BELOW. LPA SHOULD CONSULT NATURAL ENGLAND ON LIKELY RISKS FROM THE FOLLOWING:

All Planning Applications

Infrastructure
Pipelines, pylons and overhead cables. Any transport proposal including road, rail and by water (excluding routine maintenance). Airports, helipads and other aviation proposals.

Wind & Solar Energy

Minerals, Oil & Gas
Planning applications for quarries, including: new proposals, Review of Minerals Permissions (ROMP), extensions, variations to conditions etc. Oil & gas exploration/extraction.

Rural Non Residential

Residential

Rural Residential

Air Pollution
Any development that could cause AIR POLLUTION (incl: industrial/commercial processes, livestock & poultry units, slurry lagoons/manure stores).

Combustion
All general combustion processes. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion.

Waste
Mechanical and biological waste treatment, inert landfill, non-hazardous landfill, hazardous landfill, household civic amenity recycling facilities construction, demolition and excavation waste, other waste management.

Composting
Any composting proposal. Incl: open windrow composting, in-vessel composting, anaerobic digestion, other waste management.

Discharges
Any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream (NB This does not include discharges to mains sewer which are unlikely to pose a risk at this location).

Water Supply
Large infrastructure such as warehousing / industry where total net additional gross internal floorspace following development is 1,000m² or more.

Notes 1

Notes 2

GUIDANCE - How to use the Impact Risk Zones
/Metadata_for_magic/SSSI IRZ User Guidance MAGIC.pdf

1. DOES PLANNING PROPOSAL FALL INTO ONE OR MORE OF THE CATEGORIES BELOW?
2. IF YES, CHECK THE CORRESPONDING DESCRIPTION(S) BELOW. LPA SHOULD CONSULT NATURAL ENGLAND ON LIKELY RISKS FROM THE FOLLOWING:

All Planning Applications

Infrastructure
Pipelines, pylons and overhead cables. Any transport proposal including road, rail and by water (excluding routine maintenance). Airports, helipads and other aviation proposals.

Wind & Solar Energy

Minerals, Oil & Gas
Planning applications for quarries, including: new proposals, Review of Minerals Permissions (ROMP), extensions, variations to conditions etc. Oil & gas exploration/extraction.

Rural Non Residential

Residential

Rural Residential

Air Pollution
Any industrial/agricultural development that could cause AIR POLLUTION (incl: industrial processes, livestock & poultry units with floorspace > 500m², slurry lagoons > 200m² & manure stores > 250t).

Combustion
General combustion processes >20MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion.

Waste
Landfill. Incl: inert landfill, non-hazardous landfill, hazardous landfill.

Composting
Any composting proposal with more than 500 tonnes maximum annual operational throughput. Incl: open windrow composting, in-vessel composting, anaerobic digestion, other waste management.

Discharges
Any discharge of water or liquid waste of more than 20m³/day to ground (ie to seep away) or to surface water, such as a beck or stream (NB This does not include discharges to mains sewer which are unlikely to pose a risk at this location).
Water Supply
Large infrastructure such as warehousing / industry where total net additional gross internal floorspace following development is 1,000m² or more.
Notes 1
Notes 2
GUIDANCE - How to use the Impact Risk Zones
/Metadata_for_magic/SSSI IRZ User Guidance MAGIC.pdf

Ramsar Sites (England)
Name
SOUTH WEST LONDON WATERBODIES
Reference
UK11065
Hectares
830.26

Special Protection Areas (England)
Name
SOUTH WEST LONDON WATERBODIES
Reference
UK9012171
Hectares
830.26

Proposed Ramsar Sites (England)
No Features found

Special Areas of Conservation (England)
No Features found

Possible Special Areas of Conservation (England)
No Features found

Potential Special Protection Areas (England)
No Features found

MAGIC

2 km Buffer Map

Legend

- Local Nature Reserves (England)
- National Nature Reserves (England)
- Sites of Special Scientific Interest (England)
- SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)

Ancient Woodland (England)

- Ancient and Semi-Natural Woodland
- Ancient Replanted Woodland

Projection = OSGB36
xmin = 506100
ymin = 165800
xmax = 521900
ymax = 173700

0 0.6 1.2 km

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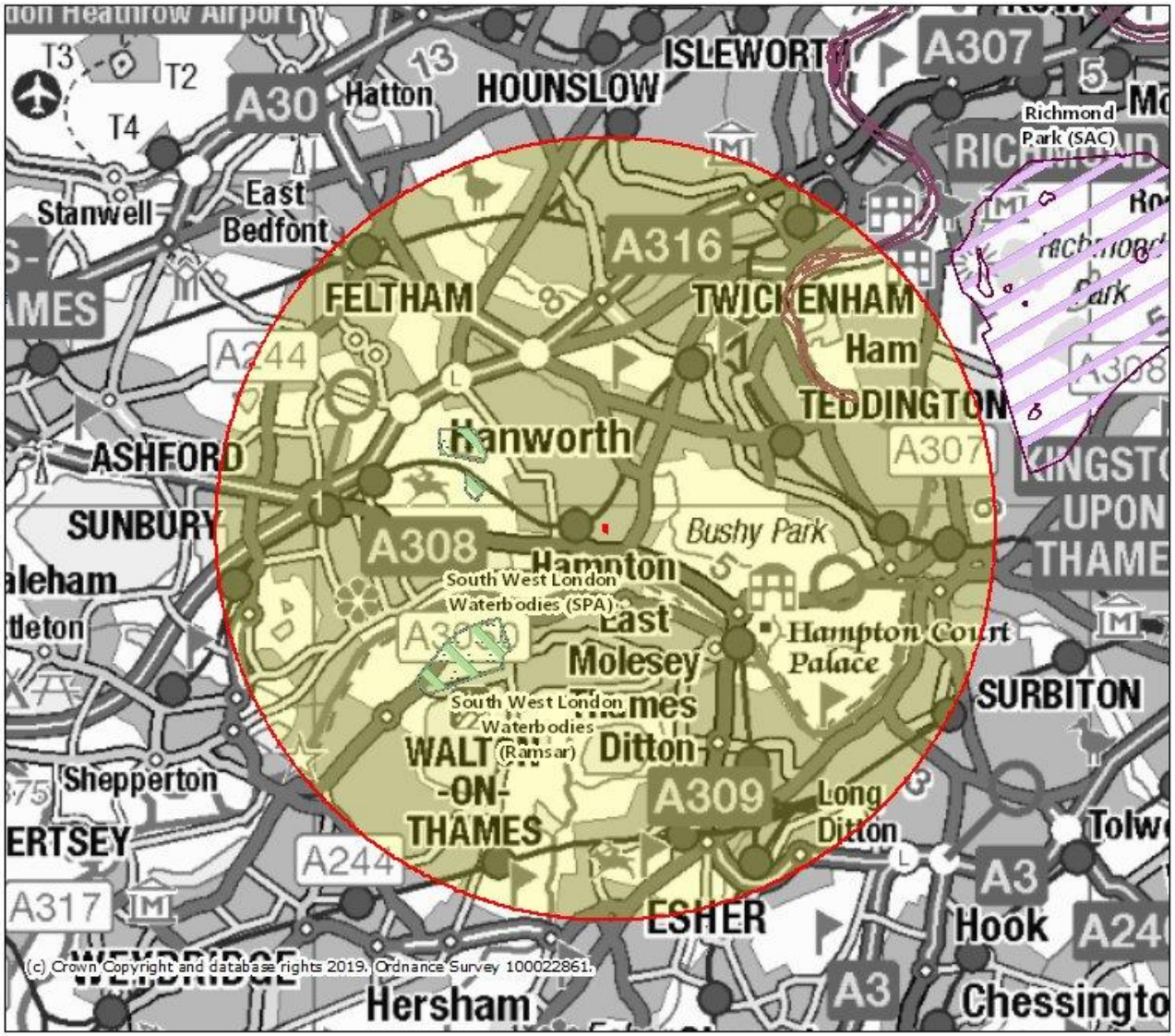
MAGiC

5 km Buffer Map



Legend

- Ramsar Sites (England)
- Proposed Ramsar Sites (England)
- Special Areas of Conservation (England)
- Possible Special Areas of Conservation (England)
- Special Protection Areas (England)
- Potential Special Protection Areas (England)

Projection = OSGB36
xmin = 494400
ymin = 160200
xmax = 532700
ymax = 179500

0 1.5 3
km

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APPENDIX 2

Overview of Relevant Species Specific Legislation

Bats
Bats and the places they use for shelter or protection (i.e. roosts) receive European protection under The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations 2017). They receive further legal protection under the Wildlife and Countryside Act (WCA) 1981, as amended. This protection means that bats, and the places they use for shelter or protection, are capable of being a material consideration in the planning process.

Regulation 41 of the Habitats Regulations 2017, states that a person commits an offence if they:

- deliberately capture, injure or kill a bat;
- deliberately disturb bats; or
- damage or destroy a bat roost (breeding site or resting place).

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is an offence under the Habitats Regulations 2017 for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead bats, part of a bat or anything derived from bats, which has been unlawfully taken from the wild.

Whilst broadly similar to the above legislation, the WCA 1981 (as amended) differs in the following ways:

- Section 9(1) of the WCA makes it an offence to *intentionally* kill, injure or take any protected species.
- Section 9(4)(a) of the WCA makes it an offence to *intentionally or recklessly** damage or destroy, *or obstruct access to*, any structure or place which a protected species uses for shelter or protection.
- Section 9(4)(b) of the WCA makes it an offence to *intentionally or recklessly** disturb any protected species *while it is occupying a structure or place which it uses for shelter or protection*.

*Reckless offences were added by the Countryside and Rights of Way (CRoW) Act 2000.

As bats re-use the same roosts (breeding site or resting place) after periods of vacancy, legal opinion is that roosts are protected whether or not bats are present.

The following bat species are Species of Principal Importance for Nature Conservation in England: Barbastelle Bat *Barbastella barbastellus*, Bechstein's Bat *Myotis bechsteinii*, Noctule Bat *Nyctalus noctula*, Soprano Pipistrelle *Pipistrellus pygmaeus*, Brown Long-eared Bat *Plecotus auritus*, Greater Horseshoe Bat *Rhinolophus ferrumequinum* and Lesser Horseshoe Bat *Rhinolophus hipposideros*.

All bat species which occur within the county are priority species on the Richmond Upon Thames Local BAP

The reader should refer to the original legislation for the definitive interpretation.

Badger
Badgers and their setts are protected under the Protection of Badgers Act 1992. The Protection of Badgers Act 1992 is based primarily on the need to protect badgers from baiting and deliberate harm or injury, badgers are not protected for conservation reasons. The following are criminal offences:

- To intentionally or recklessly interfere with a sett. Sett interference includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access to it.

- To wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so.

A badger sett is defined in the legislation as:

- *'Any structure or place that displays signs indicating current use by a badger'*.

'Current use' is not synonymous with current occupation and a sett is defined as such (and thus protected) as long as signs of current usage are present. Therefore, a sett is protected until such a time as the field signs deteriorate to such an extent that they no longer indicate 'current usage'.

Badger sett interference can result from a multitude of operations including excavation and coring, even if there is no direct damage to the sett, such as through the disturbance of badgers whilst occupying the sett. Any intentional or reckless work that results in the interference of badger setts is illegal without a licence from Natural England[30]. In England a licence must be obtained from Natural England before any interference with a badger sett occurs.

Badgers are priority species on the Richmond Upon Thames Local BAP

The reader should refer to the original legislation for the definitive interpretation.

Hedgehog
Hedgehogs receive some protection under Schedule 6 of the Wildlife and Countryside Act 1981 (as amended); this section of the Act lists animals which may not be killed or taken by certain methods, namely traps and nets, poisons, automatic weapons, electrical devices, smokes/gases and various others. Humane trapping for research purposes requires a licence.

Hedgehogs are a Species of Principal Importance for Nature Conservation in England and are thus capable of being material considerations in the planning process.

Birds
The Conservation of Habitats and Species Regulations 2017 places a duty on public bodies to take measures to preserve, maintain and re-establish habitat for wild birds.

Nesting and nest building birds are protected under the Wildlife and Countryside Act WCA 1981 (as amended).

Subject to the provisions of the act, if any person intentionally:
- kills, injures or takes any wild bird;
- takes, damages or destroys the nest of any wild bird while that nest is in use or being built; or
- takes or destroys an egg of any wild bird, he shall be guilty of an offence.

Some species (listed in Schedule 1 of the WCA) are protected by special penalties. Subject to the provisions of the act, if any person intentionally or recklessly**:**
- disturbs any wild bird included in Schedule 1 while it is building a nest or is in, on or near a nest containing eggs or young; or
- disturbs dependent young of such a bird, he shall be guilty of an offence.

Several bird species are Species of Principal Importance for Nature Conservation in England, making them capable of being material considerations in the planning process.

LISI Designated Invasive Species
A list of invasive non-native species of concern in Greater London has been compiled as a part of the London Invasive Species Initiative (LISI). This list aims to provide direction and a means of prioritisation for land managers by grouping species into different management categories, described as follows:
- **Category 1**: Species not currently present in London but present nearby or of concern because of the high risk of negative impacts should they arrive.
- **Category 2**: Species of high impact or concern present at specific sites that require attention (control, management, eradication etc).
- **Category 3**: Species of high impact or concern which are widespread in London and require concerted, coordinated and extensive action to control/eradicate.
- **Category 4**: Species which are widespread for which eradication is not feasible but where avoiding spread to other sites may be required.

- **Category 5**: Species for which insufficient data or evidence was available from those present to be able to priorities
- **Category 6**: Species that were not currently considered to pose a threat or have the potential to cause problems in London.

The initiative works to coordinate action in line with The Invasive Non-Native Species (INNS) Framework Strategy for Great Britain, whilst also delivering benefits under the Water Framework Directive and national biodiversity objectives, including the London Biodiversity Action Plan.

Cotoneaster *Cotoneaster fridgidus* is listed as category LISI 2.
Least duckweed *Lemna minuta* is listed as category LISI 4