



**Brighter strategies**  
for greener projects





**Client:** Watkin Jones Group  
**Project:** Battersea Park Road, London  
**Report:** Preliminary Ecological Appraisal

## QUALITY ASSURANCE

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## 1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd was commissioned to undertake a Preliminary Ecological Appraisal by Watkin Jones Group of a site known as Battersea Park Road in London.

This document is a report of this survey and has been produced to support a planning submission for the site which seeks the demolition of existing buildings and construction of three new buildings, together comprising residential and student accommodation, along with commercial, business and service and/or local community and learning floorspace. Associated works include hard and soft landscaping, car parking and new vehicular access / servicing, and other ancillary works to amend the development of student accommodation and apartments, as well as the associated landscape and public space.

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

Habitats on site are predominantly urban in nature, composed of developed land, sealed surfaces (hardstanding and buildings), small areas of modified grassland lawns and scattered trees.

The site offers low suitability for nesting birds in the form of mature trees; however, these are to be retained within the development proposals. The habitats on site were considered to have negligible potential for all other notable and/or protected species.

The site walkover identified two invasive species that are listed on the London Invasive species initiative (LISI). These are buddleia and green alkanet, for which mitigation recommendations are provided.

Potential impacts on nearby non-statutory designated sites should be mitigated through production of a Construction Environmental Management Plan (CEMP).

Key enhancement recommendations are described, aiming to achieve net gains in biodiversity for the site - long viability of these should be secured through production of an Ecological Management Plan (EMP).

Implementation of the above recommendations will allow proposals to be compliant with ecology-related legislation and policy (see context in Appendix C).

## 2.0 INTRODUCTION

Greengage was commissioned to undertake a Preliminary Ecological Appraisal by Watkin Jones Group of a site at 41-49 (Bookers) and 49-59 (BMW) Battersea Park Road in Wandsworth, London.

This document is a report of this survey and has been produced to support a planning submission for the site which seeks to seek the demolition of existing buildings and construction of three new buildings, together comprising Residential (Use Class C3) and Student Accommodation (Sui Generis) along with Commercial, Business and Service (Use Class E) and/or Local Community and Learning (Class F) floorspace. Associated works include hard and soft landscaping, car parking and new vehicular access / servicing, and other ancillary works.

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

### 2.1 SITE DESCRIPTION

The survey area extends to approximately 0.8 hectares and is centred on National Grid Reference TQ 29326 77257, OS Co-ordinates 529326, 177257.

The site comprises two buildings and associated hardstanding, an area of modified grassland lawn, and six mature trees.

The site is situated in a densely urbanised area, with Battersea Power Station west of the site and a collection of railway lines towards the south of the site boundary. The buildings on site face New Covent Road, which stretches towards the major A3205 road that further envelopes the site perimeter. The south-west of the site consists of further residential and commercial units.

## 3.0 METHODOLOGY

The PEA (which included an Extended Ecological UKHab Survey) was undertaken in accordance with guidance in the UK Habitat Classification System (UKHab)<sup>1</sup> and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal<sup>2</sup>, in accordance with BS42020:2013: Biodiversity<sup>3</sup>. The overall assessment consisted of:

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

The site-specific consultation provided the ecological context for the site survey carried out on the 17th March 2023.

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

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

### 3.1 DESK TOP REVIEW

A review of readily available ecological information and other relevant environmental databases (included Defra's Multi-Agency Geographic Information for the Countryside (MAGIC) website<sup>4</sup>) was undertaken for the site and its vicinity. In addition, a biological records search from Greenspace Information for Greater London (GIGL) were reviewed to identify the location and citations of local non-statutory designated sites and presence of records for notable and protected species. This provided the overall ecological context for the site, to better inform the UKHab Survey.

### 3.2 ON SITE SURVEYS

#### Flora

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

## Fauna

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

The likelihood of occurrence is ranked as follows:

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

The species surveyed for included:

### Badger (*Meles meles*)

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

### Bat Species (*Chiroptera*)

The site visit was undertaken in daylight and the evaluation of bat potential comprised an assessment of features on site that aimed to identify characteristics suitable for bat roosts, foraging and commuting. In accordance with Bat Conservation Trust's Good Practice Guidelines<sup>5</sup> and methods given in English Nature's (now Natural England) Bat Mitigation Guidelines<sup>6</sup> consideration was given to:

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

Definite signs of bat activity were taken to be:

- The bats themselves;

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

Signs of possible bat presence were taken to be:

- Stains; and
- Moth and butterfly wings.

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

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

### Great Crested Newt (*Triturus cristatus*)

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

### Reptiles

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

### Dormouse (*Muscardinus avellanarius*)

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

### Water Vole (*Arvicola terrestris*)

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

### Otter (*Lutra lutra*)

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

### Birds

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

### Invertebrates

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

### Biodiversity Action Plan priority species/ Species of Principal Importance

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

## 3.3 SURVEYORS

Jordan McNulty, who undertook the site visit and provided input into this report, has an undergraduate degree in Marine Biology (BSc Hons) and a Master's degree in Ecology, Evolution & Behaviour. Jordan has one year's experience assisting with ecological survey and assessment.

Yasmine Airton, who prepared this report, has a Bachelor's degree in Zoology (BSc Hons) and a Master's degree in Biology.

Paul White, who reviewed this report, has a Bachelor's degree in Marine Biology (BSc Hons), a Natural England Great Crested Newt Licence and Dormouse Licence, and is an Associate member of CIEEM. Paul has over 16 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was written by Yasmine Airton and reviewed and verified by Paul White who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;

- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

### 3.4 CONSTRAINTS

The PEA was undertaken during a sub-optimal time of year for botanical identification. However, owing to the urban nature of the site and the limited nature of the habitats within it, this did not impact Greengage's ability to classify all flora on site to a sufficient level.

No significant constraints that stand to impact conclusions drawn in this report therefore presented themselves.

## 4.0 RESULTS

### 4.1 DESK TOP REVIEW

#### Designations

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

However, there is one Local Nature Reserve (LNR) within 2km of the site boundary.

Records from GIGL also identified 21 non-statutory SINC's within 2km of the site boundary. SINC's are recognised by the London Planning Authority as important wildlife sites.

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

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

Site Name	Approximate Location	Description
Statutory Designations		
Battersea Park Nature Areas (LNR)	~0.6 km west	The Nature Areas consist of two areas known as the Wilderness and the Nature Reserve. The Wilderness is a linear plantation with four glades. The Nature Reserve consists of a circular belt of mixed woodland and scrub surrounding a managed meadow area. Both sites support a range of woodland bird species and invertebrates. The site is used widely by local people for informal recreation, and by local schools for environmental projects.
Non-Statutory		
Battersea Power Station (SINC)	0.3km north-west	The disused Battersea Power Station supports a breeding pair of peregrine falcons and several pairs of black redstarts. The sparse vegetation of the surrounding site provides important feeding habitat for the latter. Extensive redevelopment of this site is inevitable, but will take account of, and retain suitable habitat for these rare breeding birds.
River Thames and tidal tributaries (SINC)	0.4 km north	The River Thames and the tidal sections of creeks and rivers which flow into it comprise a number of valuable habitats not found elsewhere in London. The mud-flats, shingle beach, inter-tidal vegetation, islands and river channel itself support many species from freshwater, estuarine and marine

Site Name	Approximate Location	Description
		communities which are rare in London. 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.
Battersea Park (SINC)	0.6 km west	An important open space in central London with locally significant numbers of waterfowl associated with its large lake, including shoveler and tufted duck. The lake was the focus of an international project to study ways of improving water quality and vegetation in shallow urban lakes. A wide variety of birds regularly occurs here, both breeding and during migration. These include pochard, tufted duck, gadwall, great crested grebe and a resident pair of mute swans. The islands in the lake support one of London's larger heronries, with up to 30 nests noted in recent years. The wilder parts of the park support large numbers of butterflies - 20 species have been recorded, including the nationally scarce white-letter hairstreak. These areas are incorporated within a Local Nature Reserve.
St George's Square Gardens (SINC)	0.8km north	A small public park with a good number of mature trees. London plane is the commonest tree, but there are also a fair number of sycamore, ash, horse chestnut, tree-of-heaven and red-flowered hawthorn. Wild flowers, found mainly at the southern end and in small rough areas around the edge of the bomb shelter, included the locally uncommon pignut, plus treacle mustard, cow parsley and common vetch, with lesser celandine under some of the trees on the main lawn. Breeding birds include robin, dunnock and blackbird. Greenfinches and grey squirrels are frequently seen.
Oasis Children's Nature Garden (SINC)	1.0km south-east	The Nature Garden includes fruit, vegetable and herb gardens, raised beds, butterfly garden, a small pond, a young wooded area, a wildflower meadow and areas of tall herbaceous species. Toads and smooth newts are found in the pond, and birds such as dunnocks, blue tits, great tits, wrens, blackbirds and greenfinches occur.
Ranelagh Gardens	1.0 km north-west	These attractive ornamental gardens have been profiled into gently sloping embankments and hollows with blocks of

Site Name	Approximate Location	Description
(SINC)		planted shrubbery, lawns and a large number of mature trees. The trees are mainly London plane, with frequent horse chestnut and beech, and holly is common in the shrubbery. Some of the slopes are unmown and have begun to develop into rough land dominated by cock's-foot, cow parsley and bramble. The low wall to the east is sparsely vegetated, notably with hart's-tongue. The gardens support a good variety of common breeding birds, and both green and great spotted woodpeckers are frequently seen.

### Biodiversity Action Plans

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

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

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

The following UK BAP priority habitats were present within a 1km vicinity:

- Deciduous woodland;
- River (Thames);
- Mudflats and;
- Wood Pasture and Parkland;

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

### Wandsworth BAP

Wandsworth BAP outlines Species and Habitat Action Plans (HAP's and SAP's) for priority species and habitat in a regional context. Features of the BAP of potential relevance to this report are:

- Bats
- House sparrow
- Swift
- Black redstart
- Pollinators including hoverflies, wild bees, soldier flies and wasps.

### Species Record

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

- One record of hedgehog (*Erinaceus europaeus*);
- Bird species including swift (*Apus apus*) house sparrow (*Passer domesticus*), black redstart (*Phoenicurus ochruros*), song thrush (*Turdus philomelos*) and starling (*Sturnus vulgaris*);
- Invertebrate species including jersey tiger moth (*Euplagia quadripunctaria*) and stag beetle (*Lucanidae cervus*) and;
- Bat species including serotine (*Eptesicus serotinus*), Daubenton's bat (*Myotis Daubentonii*), Leisler's bat (*Nyctalus leisleri*), noctule (*Nyctalus noctula*), Nathusius's pipistrelle (*Pipistrellus nathusii*), common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*).

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

## 4.2 DETAILED DESCRIPTION OF SITE: HABITATS

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

### u1b-1 - Developed land; sealed surface

The majority of the site comprises buildings and hardstanding, consisting of car parks and walkways. The buildings are metal-clad warehouse structures with corrugated sheet roofing, all in good condition and of little ecological value.

The hardstanding is generally in good condition, with only occasional small amounts of ruderal species present within. Species included common chickweed (*Stellaria media*), wavy bittercress (*Cardamine flexuosa*), pellitory of the wall (*Parietaria Judaica*), common sowthistle (*Sonchus oleraceus*), common

groundsel (*Senecio vulgaris*), meadowgrass (*Poa* sp.) and mosses (*Bryophyta* sp.). A single mature London Plane (*Platanus x hispanica*) tree is present within the hardstanding area east of the Bookers building.

Occasional small, young buddleia (*Buddleja davidii*) plants were noted growing in cracks between brick walls and hardstanding.

#### g4-1 - (11) Modified grassland (with Scattered trees)

Two parcels of modified grassland were present on site, beside the car park entrance and on the northern boundary. These are raised lawn areas surrounded by brick walls. Both are patchy with a short sward height, and have been colonised by ruderal species. Species present included perennial ryegrass (*Lolium perenne*), annual meadowgrass (*Poa annua*), common nettle (*Urtica dioica*), purple dead nettle (*Lamium purpureum*), common sowthistle (*Sonchus oleraceus*) and common dandelion (*Taraxacum campylodes*), sweet violet (*Viola odorata*), common mallow (*Malva sylvestris*), cinquefoil (*Potentilla* sp.), annual mercury (*Mercurialis annua*), creeping buttercup (*Ranunculus repens*), and green alkanet (*Pentaglottis sempervirens*).

Five trees were present in the within the northern patch of grassland, comprising mature London plane and lime (*Tilia x europaea*).

### 4.3 DETAILED DESCRIPTION OF SITE: SPECIES

#### Bats

##### Foraging

Despite bat records existing within 1km, the site and surroundings are heavily disturbed, well-lit urban environments, and the site offers minimal foraging and commuting habitat. Therefore, the site is considered to be of **negligible** potential for foraging and commuting bats.

##### Roosting

The interior and exterior inspection of the buildings noted no potential roosting features for bats (PRFs). The trees also contained no PRFs. Overall, the site has **negligible** potential to support roosting bats.

#### Birds

Nesting opportunities for birds are limited to the trees in the north of the site. However these trees are subject to disturbance from adjacent busy roads, limiting their value to nesting birds.

The site is considered to have **low** potential for nesting birds.

#### Invasive/Non-native species

Buddleia was identified towards the west of the site perimeter. There was also a cluster of green alkanet present on the larger section of grassland along the site's northern boundary. Buddleia is listed on the London Invasive Species Initiative (LISI) as a category 3 species, which pose a high impact or concern at

specific sites and require attention. Green alkanet is a category 6 species which has a potential to cause future problems if actions are not applied to manage its control.

### Other notable and/or protected species

The limited habitats and isolated nature of the site offer **negligible** for all other notable and/or protected species, beyond those noted above.

## 5.0 EVALUATION AND DISCUSSION

### 5.1 BASELINE SUMMARY

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

Table 5.1 Baseline Summary

Receptor	Presence/Potential Presence	C0,6kmomments
Designated Sites: Statutory	Present within 2km	There is one Local Nature Reserve situated 0.6 km from the site. Direct impacts are unlikely to extend to the LNR as it is separated from site by the A3205 and three railway lines. In addition, there is limited habitat connectivity, which reduces any impact to the LNR during construction. Therefore, no mitigation is required.
Designated Sites: Non-Statutory	Present within 2km	The closest SINC, Battersea Power Station, is 0.3km from the site. Although buffered by existing development, due to its proximity, there is a potential that the development may cause disturbance during the construction phase through noise, dust, etc. Impacts such as dust, noise, vibration, etc. mitigated within a Construction Environmental Management Plan (CEMP).
Invasive/Non-native species	Present	Further survey in relation to the invasive buddleia and green alkanet found on site is not necessary. However, mitigation measures to prevent the spread of this species is included below.
Birds	Low potential	The suitable nesting bird habitat (trees) is to be retained, therefore further survey or action is not required. Should plans change and tree removal be required, precautionary mitigation would be required, as detailed below.

## 5.2 DISCUSSION AND RECOMMENDATIONS

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

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

### Non-statutory Designated Sites

Although limited to a degree by existing development acting as a buffer, demolition and construction activities could cause potential impacts on the closest SINC's due to noise, dust, vibration, etc. A Construction Environment Management Plan (CEMP) document should accordingly be produced, which should detail the control measures that will be implemented to avoid and mitigate potential impacts.

### Birds

The on-site trees are to be retained, therefore mitigation for potential impacts on nesting birds are not required.

However should plans change and tree removal be required, this should take place outside of the nesting bird season (taken to run from March-August inclusive).

If this is not possible, an inspection of the trees within 48 hours prior to clearance should be undertaken by a suitably qualified ecologist to confirm the absence of any nesting birds. If an active nest is discovered, an appropriate species-dependent buffer system should be put in place, within which all works should be prevented until the young have fledged and the nest becomes inactive.

### Invasive/Non-native species

Buddleia and green alkanet, both listed on LISI, were confirmed on site. To ensure these plants do not spread in the wild as a result of the development proposals, the following steps from LISI should be followed before, during, and after site clearance:

- During clearance, steps should be taken, through appropriate disposal methods, to ensure that the plants are not allowed to spread in the wild.
- Ongoing monitoring of landscapes areas and green / biodiverse roofs should include a check for invasive species, which should be removed as above if recorded.

### Biodiversity Enhancements

In accordance with the National Planning Policy Framework, local policy drivers and recent changes to the legislative context, (Appendix C), proposals should seek to provide measurable net gains in

biodiversity. These should aspire to a minimum of 10% net gain in biodiversity, which should be evidenced through a Biodiversity Impact Assessment (BIA) using the Natural England Statutory biodiversity metric<sup>7</sup> or similar.

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

- Green walls – Climber and trellis system vertical greening should be provided on suitable elevations of the buildings.
- Biodiverse / green roofs should be provided.
- Wildlife friendly planting – new landscaping should provide a diverse mix of species of demonstratable value for wildlife known to be at site/have the potential to be encouraged to the site. Plant species should include those of high value to pollinators (e.g. those listed on RHS Plants for Pollinators<sup>25</sup>).
- New trees of a variety of species should be incorporated into landscape designs.
- Bird boxes – nesting opportunities for birds, particularly targeting house sparrows (house sparrow terraces), black redstart (open-fronted boxes close to green roofs) and swifts (integrated boxes at height), should be provided. To ensure permanence, it is recommended that these boxes are integrated into the building walls.
- Bat boxes–Integrated bat boxes should be provided on the elevations of new buildings.

Long-term viability of the enhancements should be secured through production of an Ecological Management Plan (EMP).

## 6.0 SUMMARY & CONCLUSION

Greengage was commissioned to undertake a Preliminary Ecological Appraisal by Watkin Jones Group of a site at 41-49 (Bookers) and 49-59 (BMW) Battersea Park Road in Wandsworth, London, in order to establish the ecological value of this site and its potential to support notable and/or legally protected species.

The PEA identified the site to possess low potential for nesting birds, and negligible potential for all other notable and or/protected species. Impacts on nesting birds are not anticipated due to the retention of potentially suitable habitat (the on-site trees).

Potential impacts on nearby non-statutory designated sites should be mitigated through production of a CEMP.

Key enhancement recommendations are described, aiming to achieve net gains in biodiversity for the site - long viability of these should be secured through production of an EMP.

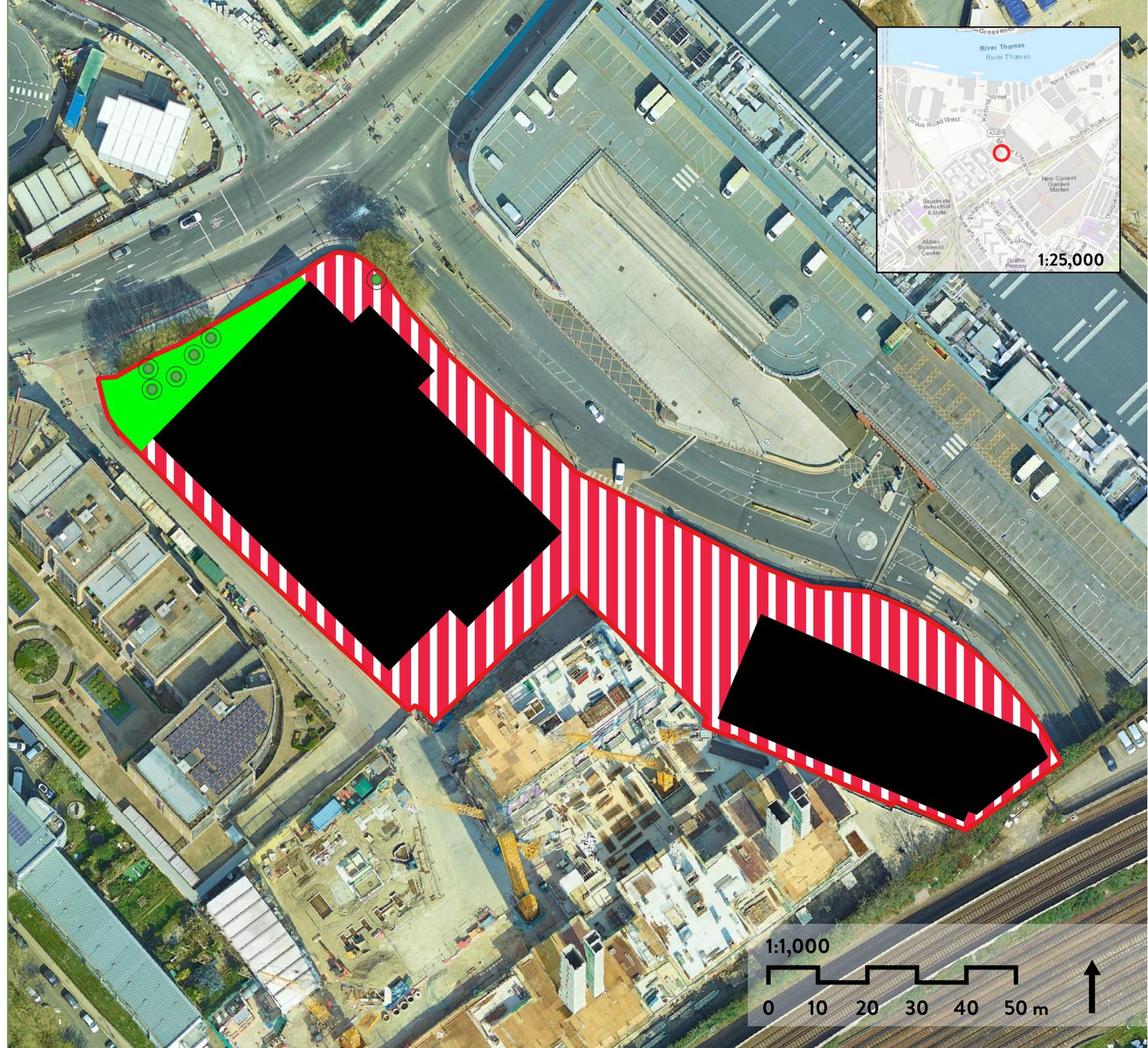
Implementation of the above recommendations will allow proposals to be compliant with ecology-related legislation and policy (see context in Appendix C).

## APPENDIX A SITE PLAN AND HABITAT MAP

*Figure A.1 Site plan and habitat map*

# BATTERSEA PARK ROAD

-  Red Line Boundary
-  Tree
-  Developed land; sealed surface
-  Modified grassland
-  Buildings

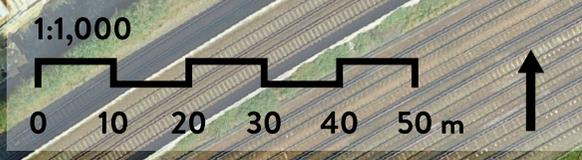


Title: Figure A.1 Site Plan and Habitat Map

Drawn by: JT  
Date: 28/03/2023

Reviewed by: PW  
Date: 28/03/2023

Project number: 552268  
Sources: ESRI World Topo, Google Satellite



## APPENDIX B SITE PHOTOGRAPHS

Figure 1.1: Front of building with associated car park



Figure 1.2: Parcel of modified grassland



Figure 1.3: Mature trees



Figure 1.4: Small buddleia plant



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## APPENDIX C RELEVANT LEGISLATION AND POLICY

### C.1 LEGISLATION

Current key legislation relating to ecology includes The Environment Act<sup>8</sup> Wildlife and Countryside Act 1981 (as amended)<sup>9</sup>; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')<sup>10</sup>, The Countryside and Rights of Way Act 2000 (CRoW Act)<sup>11</sup>, and The Natural Environment and Rural Communities Act, 2006<sup>12</sup>.

#### The Environment Act, 2021

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

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

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

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

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

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)<sup>13</sup>, and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')<sup>14</sup>, and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')<sup>15</sup> into UK law (in conjunction with the Wildlife and Countryside Act).

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

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

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

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

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

## Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats<sup>16</sup> (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

## The Countryside and Rights of Way Act 2000

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

## The Natural Environment and Rural Communities Act 2006

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

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (*Erinaceus europaeus*), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan<sup>17</sup> (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework<sup>18</sup> (and Biodiversity 2020 strategy<sup>19</sup> in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020<sup>20</sup> and EU Biodiversity Strategy (EUBS)<sup>21</sup>, this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

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## Biodiversity Action Plans

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

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

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

## Legislation Relating to Nesting Birds

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

## Legislation Relating to Bats

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

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

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

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

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

Consequently, it is an offence to:

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

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

This legislation applies to all bat life stages.

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

## Legislation Relating to Reptiles

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

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

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

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

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

## Legislation Relating to Dormice

Dormice are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Protection to the species is also afforded by Regulation 43 of the Conservation of Habitats and Species Regulations 2017, making the hazel dormouse a European Protected Species. These two pieces of legislation operate in parallel, although there are some small differences in scope and wording. Under the provisions of Section 9 of the Wildlife & Countryside Act, it is an offence to:

- Intentionally kill, injure or take a dormouse;
- Possess or control and live or dead specimen or anything derived from a dormouse (unless it can be shown to have been legally acquired);
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a dormouse; and
- Intentionally or recklessly disturb a dormouse while it is occupying a structure or place which it uses for that purpose.

Regulation 43 of the Conservation of Habitats and Species Regulations 2017 makes it an offence to:

- Deliberately capture or kill a dormouse;
- Deliberately disturb a dormouse;
- Damage or destroy a breeding site or resting place of a dormouse; and
- Keep transport, sell or exchange, or offer for sale or exchange a live or dead dormouse or any part of a dormouse.

## Legislation Relating to Great Crested Newts

Legislation Relating to Natura 2000 Sites and Habitats Directive Annex I/II Species

European Commission Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive'), and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive') form the cornerstones of nature conservation legislation across EU member states. Priority species requiring protection across Europe are listed in the Annexes of these Directives. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 and Offshore Marine Conservation Regulations, 2007 (as amended) transpose these directives into UK law and set the basis for the designations of protected sites (known as Natura 2000 sites; Special Areas of Conservation under the Habitat Directive and Special Areas of Protection under the Birds Directive) that are of importance for habitats, species or assemblages listed on the directive Annexes. In the UK Ramsar sites are also offered the same level of protection as SPAs and SACs however the qualifying species for the designation may differ; Ramsar sites being designated specifically as important wetland habitats.

Under article 6(3) of the Habitats Directive, where projects stand to have likely significant effect (in accordance with the European Court of Justice ruling of C-127/02 Waddenzee cockle fishing) upon the integrity of conservation objectives (i.e. conservation status of the qualifying species or habitats) within the designated sites then the Competent Authority must undertake an Appropriate Assessment.

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## C.2 PLANNING POLICY

### National

#### National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2023<sup>22</sup> sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

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

### Regional

#### The London Plan<sup>25</sup>

##### *Policy G1 Green infrastructure*

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

##### *Policy G5 Urban greening*

1. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

2. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. (excluding B2 and B8 uses).
3. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

### *Policy G6 Biodiversity and access to nature*

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

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### *Policy G7 Trees and woodlands*

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

### *London Environment Strategy 2018<sup>24</sup>*

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

#### *Objective 5.1 Make more than half of London green by 2050*

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

This policy states:

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

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

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

#### *Objective 5.2 conserving and enhancement wildlife and natural habitats*

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

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

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

## Local

### Wandsworth Local Plan 2023-2038<sup>25</sup>

The new Wandsworth Local Plan was adopted in July 2023, and contains policies specific to biodiversity and urban greening.

#### *LP55- Biodiversity*

A. The Council will protect and, where appropriate, secure the enhancement of the borough’s priority species, priority habitats and protected sites as well as the connectivity between such sites. This includes but is not limited to Special Areas of Conservation, Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites and Sites of Importance to Nature Conservation.

B. Development proposals will be required to protect and enhance biodiversity, through:

- Ensuring that it would not have an adverse effect on the borough’s designated sites of habitat and species of importance, as well as other existing species, wildlife, habitats and features of biodiversity value;
- The incorporation and creation of new habitats or biodiversity features on development sites including through the design of buildings and use of Sustainable Drainage Systems where appropriate. Developments will be required to deliver a net gain in biodiversity, through the incorporation of ecological enhancements;
- Ensuring that new biodiversity features or habitats connect to the existing ecological and green and blue infrastructure networks and complement surrounding habitats;
- Enhancing wildlife corridors for the movement of species, including river, road and rail corridors, where opportunities arise; and
- Maximising the provision of ecologically functional habitats within soft landscaping.

C. Development which would have an impact on priority species or priority habitat(s) will only be permitted in exceptional circumstances where:

1. It has been demonstrated that there is no alternative site layout or site that would have a less harmful impacts; and
2. The impact has been adequately mitigated either through on or off-site measures

### *LP56 Tree Management and Landscaping*

A. The Council will require the retention and protection of existing trees and landscape features, including veteran trees.

B. Where appropriate, planning applications must be supported by sufficient evidence to demonstrate that provision has been made for the incorporation of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high-quality green areas, which deliver amenity, environmental, and biodiversity benefits.

C. To ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals, will:

#### **Trees and Woodlands**

1. Resist development that would result in the damage or loss of trees, including veteran trees and trees considered to be of townscape or amenity value, 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 and it is not possible to retain the tree as part of the development; or felling is for reasons of good arboricultural practice;
2. Consent for works to protected trees (Tree Preservation Orders and trees in Conservation Areas) will only be granted where;
  - proposed works of pruning are in accordance with good arboricultural practice;
  - proposals for felling are properly justified through a detailed arboricultural and/or structural engineer's report; and
  - adequate replacement planting is proposed.
3. Require, where practicable, an appropriate replacement on-site for any tree that is felled; where not practical, 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. Resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland;
5. 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;
6. Require the maintenance and suitability of new trees to be bespoke and considered from the beginning of the design process;
7. 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 will be encouraged where appropriate; and

8. 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). D. The Council will serve a Tree Preservation Order or attach planning conditions which protect any trees considered to be of value to the townscape and amenity in order to secure their retention.

### **Landscape**

E. The Council will:

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

### *LP57 Urban Greening Factor*

A. All development proposals should contribute to the greening of Wandsworth borough 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. Development proposals will be required to:

1. Follow the guidance on the Urban Greening Factor (UGF) in the London Plan for calculating the minimum amount of urban greening required as well as for the thresholds different types of development will be required to meet;
2. Incorporate as much soft landscaping and permeable surfaces as possible; and
3. Take into consideration the vulnerability and importance of local ecological resources (such as water quality and biodiversity) when applying the principles of the UGF.

C. In exceptional circumstances, if it can be clearly demonstrated that meeting the thresholds would not be feasible, a financial contribution may be acceptable to provide for the improvement of biodiversity and green and blue infrastructure assets within the locality

## REFERENCES

- <sup>1</sup> Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2020) *The UK Habitat Classification User Manual Version 2* CIEEM (2017); *Guidelines for Preliminary Ecological Appraisal, 2<sup>nd</sup> Edition*. Chartered Institute of Ecology and Environmental Management, Winchester.
- <sup>3</sup> BSI (2013); *British Standard 42020:2013: Biodiversity – Code of practice for planning and development*, BSI Standards Publication
- <sup>4</sup> MAGIC (2019); *Interactive Map*. (Partnership project involving six government organisations: Defra (Department for Environment, Food and Rural Affairs); English Heritage; Natural England; Environment Agency; Forestry Commission; Department for Communities and Local Government). Available at: [www.magic.gov.uk](http://www.magic.gov.uk).
- <sup>5</sup> Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition)*. The Bat Conservation Trust, London
- <sup>6</sup> English Nature, (2004); *Bat Mitigation Guidelines*. English Nature.
- <sup>7</sup> *Statutory biodiversity metric*. Available at <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>
- <sup>8</sup> GOV.UK. (2021). *Environment Act 2021*. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>
- <sup>9</sup> HM Government, (1981); *Part I and Part II of Wildlife and Countryside Act (as amended)*. HMSO
- <sup>10</sup> HM Government, (2017); *The Conservation of Habitats and Species Regulations 2017*. Statutory Instrument 2017 no. 490 *Wildlife Countryside*. OPSI
- <sup>11</sup> HM Government, (2000); *The Countryside and Rights of Way Act*. HMSO
- <sup>12</sup> HM Government, (2006); *Natural Environment and Rural Communities Act 2006*. HMSO
- <sup>13</sup> HM Government, (1994); *The Conservation (Natural Habitats, &c.) Regulations*. HMSO
- <sup>14</sup> CEC (Council of the European Communities), (1992); *Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora*
- <sup>15</sup> *The European Parliament And Of The Council, (30 November 2009); Directive 2009/147/EC On The Conservation Of Wild Birds (Codified Version)*
- <sup>16</sup> CEC (Council of the European Communities), (1979); *Convention on the Conservation of European Wildlife and Natural Habitats (Bern, 19.IX.1979)*. EC
- <sup>17</sup> *UK Biodiversity Action Plan (2007). UKBAP Priority Species and Habitats*. <http://www.ukbap.org.uk/newprioritylist.aspx>
- <sup>18</sup> JNCC and Defra (on behalf of the Four Countries' Biodiversity Group) (2012). *UK Post-2010 Biodiversity Framework*. July 2012. Available from: <http://jncc.defra.gov.uk/page-6189>
- <sup>19</sup> Defra (2011). *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*
- <sup>20</sup> *Convention on Biological Diversity (CBD) (2010). Decision X/2 Strategic Plan for Biodiversity 2011-2020, including Aichi Biodiversity Targets*. Available at <https://www.cbd.int/decision/cop/?id=12268>
- <sup>21</sup> *European Commission (2012). Our life insurance, our natural capital: an EU biodiversity strategy to 2020 European Parliament resolution of 20 April 2012 on our life insurance, our natural capital: an EU biodiversity strategy to 2020 (2011/2307(INI))*
- <sup>22</sup> GOV.UK. (2023). *National Planning Policy Framework*. [online] Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- <sup>23</sup> *Greater London Authority (2021) The London Plan: The Spatial Development Strategy for Greater London (GLA)*
- <sup>24</sup> *Greater London Authority (2018). London Environment Strategy 2018*. London: Greater London Authority.
- <sup>25</sup> *RHS Plants for pollinators guide*. [Native and non-native plants for pollinators / RHS Gardening](https://www.rhs.org.uk/plants/and-pests/plant-care/gardening-guides/native-and-non-native-plants-for-pollinators)
- <sup>25</sup> *Wandsworth Local Plan 2023-2038*. Available at: [https://www.wandsworth.gov.uk/media/large/adopted\\_local\\_plan.pdf](https://www.wandsworth.gov.uk/media/large/adopted_local_plan.pdf)