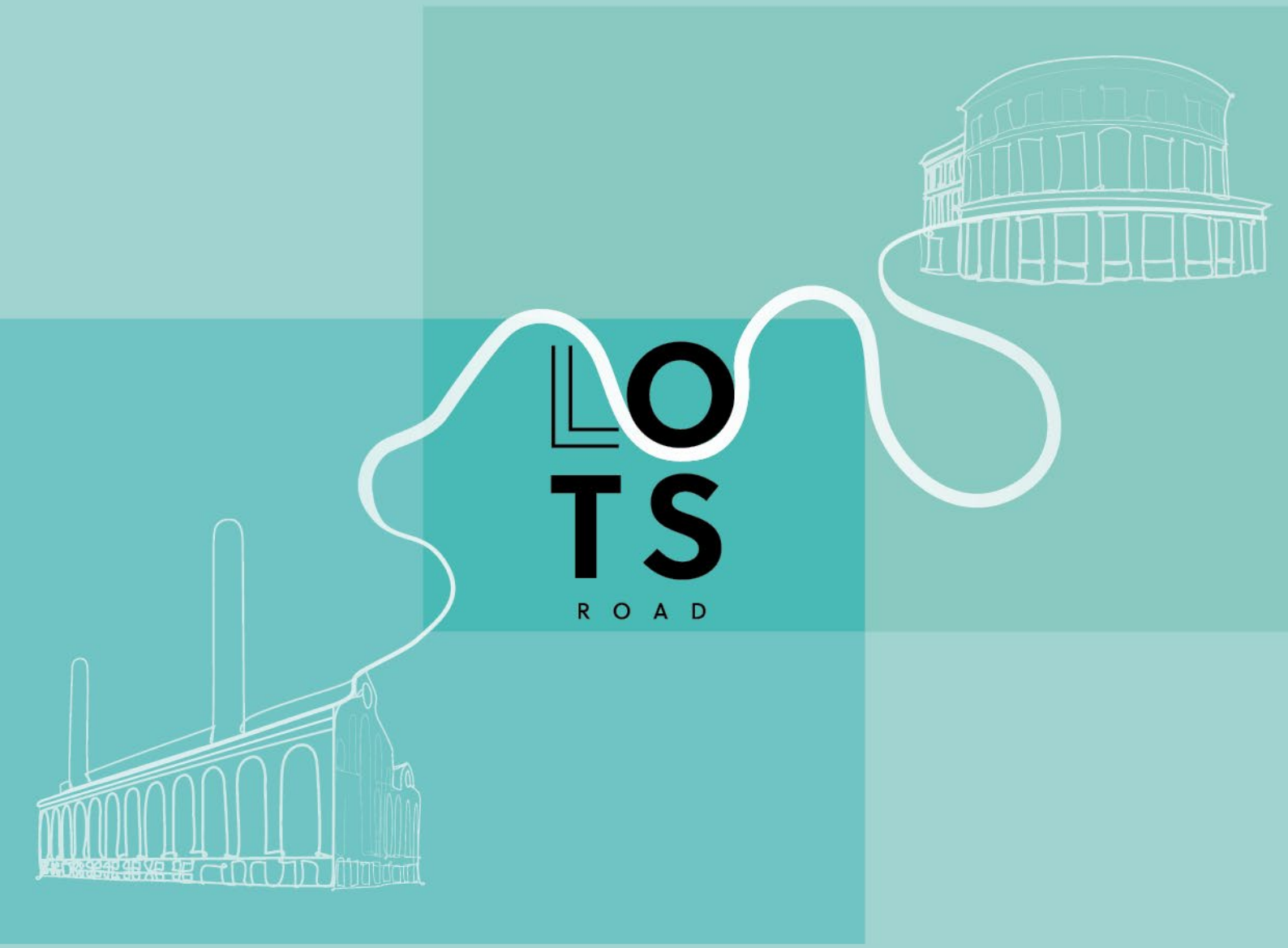
MOUNTANVIL

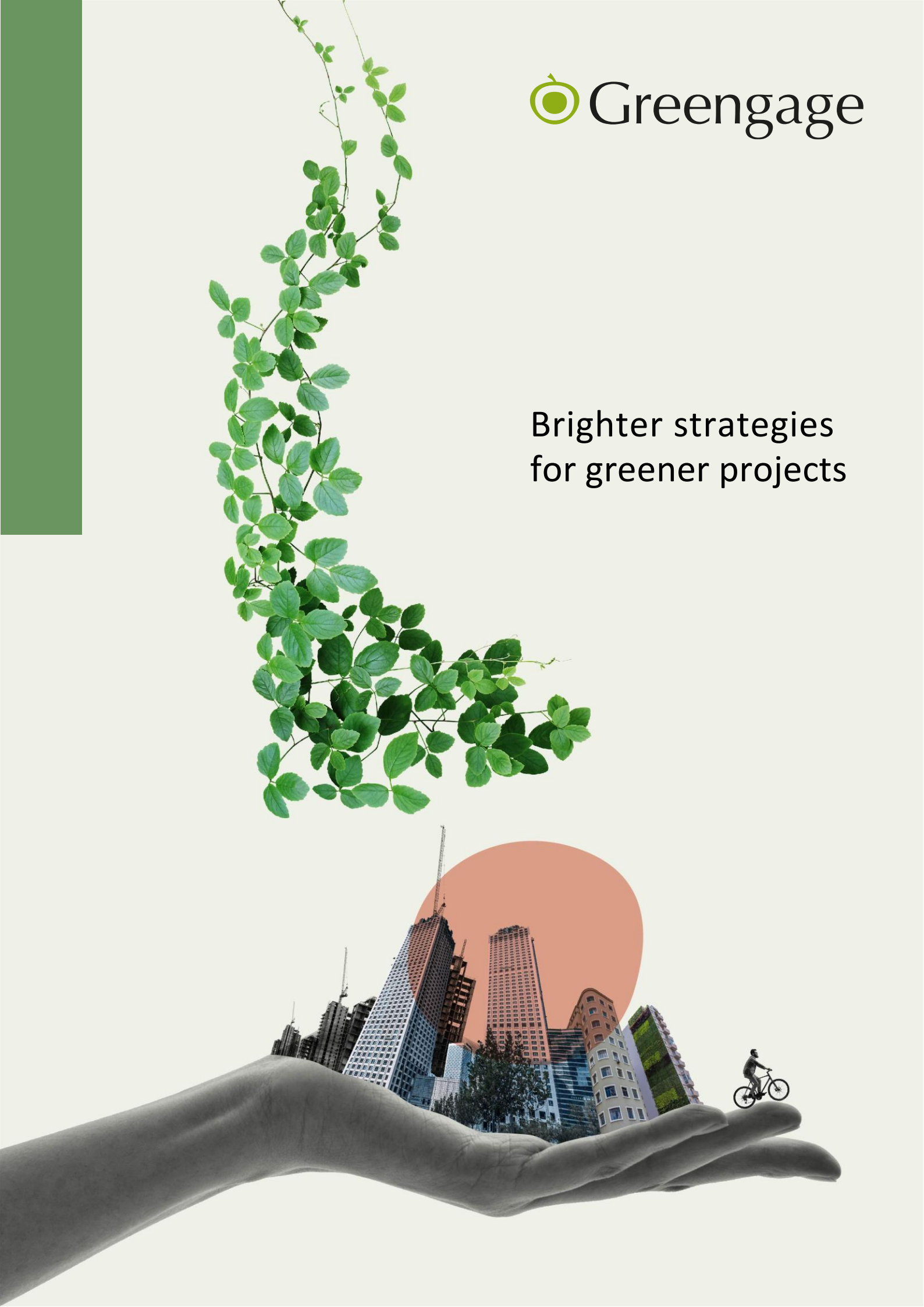


LR45
Biodiversity Survey and Report

Greengage

Greengage

Brighter strategies for greener projects



Client: Mount Anvil (Lots Road) LLP

Project: Lots Road South

Report: Preliminary Ecological Appraisal

QUALITY ASSURANCE

Issue/Revision:	Draft	Final	Update
Date:	July 2023	August 2023	July 2025
Comments:			Updates to align with 2025 crib sheet
Prepared by:	Isobel Novak	Isobel Novak	Alex Hurley
Authorised by:	Mike Harris	Mike Harris	
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1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd (Greengage) was appointed by Mount Anvil (Lots Road) LLP (the 'Applicant') to undertake a Preliminary Ecological Appraisal (PEA), to support the consideration of proposals to transform Lots Road South in West Brompton, London, hereafter referred to as 'the Site'.

This document is a report of this survey and has been produced to support the consideration of proposals for the Site which seeks:

"*Detailed planning application for the demolition of existing buildings and structures and the comprehensive redevelopment to provide a mixed-use scheme comprising the erection of three new buildings forming five blocks ranging in height from 5 to 13 storeys. The development will deliver new homes, including affordable extra care homes, affordable general needs homes and market homes (Use Class C3), alongside non-residential floorspace including flexible commercial (Use Class E (a)(b)(g), education and art gallery space (Use Class F1 a/b) and community space (Use Class F2). The scheme includes provision for a basement accommodating plant and cycle storage. Vehicular, pedestrian, and cycle access will be taken from Lots Road. The scheme will be car free except for disabled car parking spaces. Long stay and short stay cycle spaces will be provided. The application also includes associated infrastructure, hard and soft landscaping works, play space and communal open space. Proposals include and enhancements to the Chelsea Creek wall comprising the construction of new retaining structures, intertidal landscaping, and biodiversity improvements.*"

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.

The survey area extends to approximately 0.78 hectares (ha) and comprises both permanent and temporary buildings, developed land; sealed surface, scattered introduced shrub and individual trees. There is also an area of mixed scrub in the southern area of the side bordering on an offsite creek.

The Site has potential to support the following notable species:

- **Moderate** potential to support commuting, foraging and roosting bats;
- **Moderate** potential to support nesting birds;

The potential for the Site to support all other protected and/or notable species is negligible due to the urban location and the majority of the Site containing unsuitable habitat.

Due to the buildings on site holding moderate potential for bats, two dusk emergence surveys should be undertaken to determine the presence/absence of roosting bats within the potential features on the main building. These surveys should follow Bat Conservation Trust (BCT) Good Practice Guidelines[1].

Further survey in relation to nesting birds is not required however mitigation actions to ensure no nests are damaged or destroyed during clearance and construction works are recommended within this report. These recommendations are mainly around sensitive timings of works or undertaking a search for active nests immediately prior to any habitat clearance.

There is a confirmed presence of invasive species on site, notably multiple large stands of buddleia (*Buddleja davidii*) and extensive mats of Virginia creeper (*Parthenocissus quinquefolia*). Himalayan balsam (*Impatiens glandulifera*) was previously reported by another individual within the mixed

scrub in the southern area of the Site, but not observed upon inspection of the area by Greengage. However, care should still be taken during clearance works.

Mitigation advice is detailed within this report which should be summarised within an Ecological Management Plan (EMP) and secured by condition. There should also be a Construction Environment Management Plan (CEMP) detailing measures such as control of pollution forms such as dust, lighting, run-off and noise to minimise impacts on the designations identified within the immediate vicinity of the Site boundary.

Recommended ecological enhancements are specified within this report, targeting UK, London and local Kensington and Chelsea Biodiversity Action Plan (BAP) species and habitats, to help enhance the qualitative biodiversity value of the Site.

The development should also deliver a net gain for biodiversity, in accordance with the Environment Act 2021. This will be confirmed via a separate Biodiversity Net Gain Assessment (BNGA). It is also recommended that these enhancement measures are presented with the EMP.

2.0 INTRODUCTION

Greengage Environmental Ltd (Greengage) was appointed by Mount Anvil (Lots Road) LLP (the 'Applicant') to undertake a Preliminary Ecological Appraisal (PEA), to support the consideration of proposals to transform Lots Road South in West Brompton, London, hereafter referred to as 'the Site'.

This document is a report of this survey and has been produced to support the consideration of proposals for the Site which seeks:

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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 Site extends to approximately 0.78 hectares (ha) and is centred on Ordnance Survey National Grid Reference (OS NGR): TQ 26186 77024, OS Co-ordinates 526186, 177024. The Site can be seen in Appendix A.

The Local Planning Authorities are Royal Borough of Kensington and Chelsea (RBKC) and London Borough of Hammersmith and Fulham (LBHF) and the planning application is referable to the Mayor of London.

The Site sits on the boundary between RBKC and LBHF, with the authority boundary splitting the Site on the north-west to south-east axis. 69% of the Site is in RBKC (eastern part); 31% of site in LBHF (western part). The Site is owned by RBKC, and their land ownership extends across both boroughs.

The Site sits in the south-west corner of RBKC, where it meets the southeast corner of LBHF. It is located on the south-western side of Lots Road between Chelsea Harbour and the King's Road. The Site is located within Lots Road Employment Zone. It is immediately adjacent to the Lots Village Conservation Area and a small part of the Site in the southwest corner is located in the Sands End Conservation Area.

The Site is well connected and accessible, with a PTAL rating of 3 and 4. It is within walking distance of Imperial Wharf overground station and Fulham Broadway and is served by frequent bus services.

The Site currently comprises the former two storey Lots Road Auction House and another two storey warehouse building accommodating Fairbank Studios, Access Self Storage and mixed retail. The Site also comprises a car pound which includes some temporary buildings, a salt store, and cabins which accommodate RBKC's street sweeping and recycling service providers. An access road runs through the Site which provides access to RBKC's highway's depot to the north. Land in the northwest corner of the Site forms part of this highway depot and is used for at grade parking and material storage. The application site also includes the outside space of Heatherley School of Fine Art.

The surrounding area predominantly comprises residential dwellings, commercial uses and education uses. To the north of the Site is Heatherley School of Fine Art. To the east of the Site is Worlds End Studios, Chelsea Academy, the Lots Road Public House, as well as two residential buildings with ground floor commercial units. Further east of this is predominantly terraced housing. To the south of the Site is Chelsea Creek, and beyond that the residential buildings of Chelsea Harbour, as well as the Design Centre. The West London Line sits directly to the west of the Site boundary, with the Kings Road Park development site beyond.

The part of the Site located in RBKC is allocated as Policy SA6 Lots Road South in RBKC's New Local Plan Review (July 2024). The part of the Site located in LBHF is not allocated for any use.

Chelsea Creek, part of the River Thames and tidal tributaries network, flows adjacent to the southern site boundary. The creek intakes tidal water from the River Thames and hence is subject to tidal fluctuations in river level. The southern site boundary is bounded by a Creek Wall comprising a combination of concrete, steel sheet piling and brickwork with an area of unconsolidated bank of made ground, rubble and alluvium which was constructed in the mid-20th Century.

2.2 ECOLOGICAL BACKGROUND

Preliminary Ecological Appraisal 2022

A PEA was undertaken by an external consultancy specifically for the creek and mixed scrub area in June 2022[2].

The main findings of the 2022 PEA survey were:

- The development of the creek and area of mixed scrub is unlikely to have any significant effects on designated sites, priority habitats or protected species in the local area, due to the lack of suitable habitat on site, and the lack of connectivity to any wider habitats; and
- The Site is not found to support suitable habitat for dormice, great crested newts, water voles, otters and hedgehogs. Therefore, further surveys for these species are not needed.

The main recommendations were:

- To implement construction safeguards to prevent water, dust, noise and light pollution to the priority mud flats located c. 50m southeast of the Site, to the River Thames on site, and to the adjacent SINC;
- To undertake any clearance of suitable nesting habitats outside of bird nesting season (March – September inclusive) or after a nesting bird check by a qualified ecologist; and
- To ensure the invasive species on site are controlled, removed and ideally eradicated, where possible.

Updated Ecology Site Walkover 2025

An updated ecology site walkover[3] was undertaken by Greengage on 7th March 2025 to assess whether the condition of any habitats on site and/or bat roosting suitability within the buildings present had changed since the initial March 2023 PEA site walkover.

The updated site walkover confirmed that on-site conditions were found to be broadly similar to the initial PEA survey, with the exception of the following:

- Increase in bramble (*Rubus fruticosus* agg.) on the creek bank

Further detail of the updated ecology site walkover are presented in a standalone letter report and should be read in conjunction with this PEA report.

3.0 METHODOLOGY

The PEA (which included an Extended Ecological Phase 1 Survey) was undertaken in accordance with guidance in the UK Habitat Classification System (UKHab)[4] and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal[5], in accordance with BS42020:2013: Biodiversity[6]. 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 phase 1 habitat survey.

The Site-specific consultation provided the ecological context for the Site survey carried out on 25th May 2023.

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

Greengage undertook the Site walkover during dry 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[7]) was undertaken for the Site and its vicinity. In addition, local websites and a biological records search from GiGL (received 14th June 2023) 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 Phase 1 Survey.

3.2 ON SITE SURVEYS

Flora

The extent and distribution of different habitats on site were identified and mapped according to the standard Phase 1 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 at Figure A.1.

Fauna

The Phase 1 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:

Bat Species (*Chiroptera*)

The Site walkover 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 BCT Good Practice Guidelines[1] and methods given in CIEEM Bat Mitigation Guidelines[8] 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.

Potential Roosting Features (PRF) were noted during the Site walkover examples of which include mature trees with holes, crevices or splits, caves, bridges, tunnels and buildings with cracks or gaps in brickwork or built features which act as PRFs themselves or serving as possible access/egress points to voids or cavities. PRFs were also assessed for their hibernation suitability which may be subject to change dependent on further survey results, if required.

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.

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.

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

Isobel Novak, who undertook both the PEA, has a degree in Biology (BSc Hons), an MSc in Conservation, and is a Qualifying member of CIEEM with 1 years' experience in ecological survey and assessment.

Mike Harris, who reviewed and approved this report, has a Bachelor’s degree in Environmental Biology (BSc Hons), a Natural England Great Crested Newt Licence and Dormouse Licence, is a

Chartered Environmentalist (CEnv) and Full member of CIEEM. Mike has over 20 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was written by Isobel Novak and reviewed and verified by Mike Harris 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 site walkover was undertaken within the optimal botanical growing season (typically recognised as May - September) during ideal conditions by a suitably qualified ecologist.

Since the PEA walkover undertaken in May 2023, the red line boundary was revised in May 2025 to include additional areas:

- the outdoor space of the Heatherley School of Fine Art at the northern extent of the site;
- the footpath and street trees along the eastern boundary; and
- a larger area to the south incorporating an English oak (*Quercus robur*).

These areas were not assessed during the PEA walkover and are therefore not considered in this report. However, as they consist of urban habitats, and the proposed works in the northern and eastern areas are limited to new paving and replacement of an existing gate, and the English oak to the south is to be retained, these changes do not materially affect the conclusions of this report.

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 and no LNRs within the boundary of the Site or within 2km of the Site.

However, records from GiGL identified 20 non-statutory Sites of Importance for Nature Conservation (SINCs) and one proposed SINC within 2km of the Site boundary.

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

Table 4.1 Non-Statutory Designated Sites within Search Radius

Site Name	Approximate Location	Description
River Thames and tidal tributaries (SINC of Metropolitan Importance)	Various locations - nearest point is Chelsea Creek immediately adjacent to the southern site boundary	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 communities which are rare in London. The Site is of particular importance for wildfowl and wading birds. The river walls, particularly in south and east London, also provide important feeding areas for the nationally rare and specially-protected black redstart. 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. Barking Creek supports extensive reed beds. Further downstream are small areas of saltmarsh, a very rare habitat in London, where there is a small population of the nationally scarce marsh sow-thistle (Sonchus palustris). Wetlands beside the river in Kew support the only London population of the nationally rare and specially-protected cut-grass (*Leersia oryzoides*). The numerous small islands in the upper reaches support important invertebrate communities, including several nationally rare snails, as well as a number of heronries. Chiswick Eyot, one of the islands, is a Local Nature Reserve.

Site Name	Approximate Location	Description
		The towpath in the upper reaches supports a diverse flora in places with numerous London rarities, both native and exotic. The River Thames upriver of the Thames Barrier is followed by the Thames Path National Trail.
British Gas Pond (SINC of Borough Grade I Importance)	65m south	This pond, the only remnant of a short canal which once linked Fulham Gas Works to Chelsea Creek, is probably the best in Hammersmith & Fulham from a botanical point of view. Three sides of the pond have excellent marginal vegetation, including great reedmace (*Typha latifolia*), gypsywort (*Lycopus europaeus*), brooklime (*Veronica beccabunga*), common water-plantain (*Alisma plantago-aquatica*), amphibious bistort (*Persicaria amphibia*), trifid bur-marigold (*Bidens tripartita*), bittersweet (*Solanum dulcamara*), water mint (*Metha aquatica*) and pale galingale (*Cyperus eragrostis*). The pond is probably not so valuable for amphibians or invertebrates due to a large population of carp. There is a small patch of willow (*Salix* spp.) scrub at the southern end. The fourth side of the pond is a high brick wall, on which grows fern-grass (*Catapodium rigidum*), which is scarce in London.
West London line south of Earl's Court (SINC of Borough Grade I Importance)	430m northwest	Part of a network of railway lines which criss-cross Hammersmith & Fulham, providing some of the borough's most important wildlife habitats. The West London line runs in a shallow cutting along the borough boundary with Kensington & Chelsea, beside Brompton Cemetery. The Kensington & Chelsea side of the cutting is described as West London Line in Brompton. Part of the cutting is shared with the District line. A variety of habitats can be seen along the railsides, including scrub of goat willow (*Salix caprea*) and butterfly-bush (*Buddleja davidii*), developing sycamore (*Acer pseudoplatanus*) woodland, tall herbaceous communities and grassland. Some of the grassland has a calcareous influence, supporting plants such as salad burnet (*Sanguisorba minor*), wall lettuce (*Mycelis muralis*) and blue fleabane (*Erigeron acer*), which are scarce in London and known nowhere else in the borough. A wet ditch contains a luxuriant growth of great reedmace with smaller amounts of water plantain and floating sweet-grass (*Glyceria fluitans*). A small nature area immediately adjacent the West London Line 'up' platform is managed by the Local

Site Name	Approximate Location	Description
		Agenda 21 Forum in partnership with the railway company and an interpretation sign is attached to the railings separating the platform and nature area.
Brompton Cemetery (SINC of Borough Grade I Importance)	495m northwest	The grassland shows a rough division between neutral, over former arable land, and acid over former meadow. Neutral grassland covers most of the Site and is dominated by false oat-grass (*Arrhenatherum elatius*) with frequent red fescue (*Festuca rubra*), cock's-foot (*Dactylis glomerata*), Yorkshire-fog (*Holcus lanatus*) and smooth meadow-grass (*Poa pratensis*). Wild flowers include lady's bedstraw (*Galium verum*), bird's-foot-trefoil (*Lotus corniculatus*), meadow vetchling (*Lathyrus pratensis*), common knapweed (*Centaurea nigra*), bulbous buttercup (*Ranunculus bulbosus*), smooth tare (*Vicia tetrasperma*), ox-eye daisy (*Leucanthemum vulgare*) and grey sedge (*Carex divulsa*). Acid grassland occurs on some of the western lawns. The sward is a mix of red fescue, common bent (*Agrostis capillaris*), sheep's fescue (*Festuca ovina*) and coarser grasses. Sheep's sorrel (*Rumex acetosella*) is locally frequent, with abundant cat's-ear (*Hypochaeris radicata*) and occasional mouse-ear hawkweed (*Pilosella officinarum*), tormentil (*Potentilla erecta*) and trailing St John's-wort (*Hypericum humifusum*). The latter is rare in London. Trees are present throughout, occasionally forming a closed canopy. Small-leaved and common limes (*Tilia cordata* and *T. x vulgaris*), holm oak (*Quercus ilex*) and horse chestnut (*Aesculus hippocastanum*) are the most frequent species. Dense bramble (*Rubus fruticosus* agg.) scrub occurs in places. Many of the tombstones are covered with ivy (*Hedera helix*). Bladder campion (*Silene vulgaris*), blue fleabane and dark mullein (*Verbascum nigrum*) occur on calcareous graves; the latter two are scarce in London. Male-fern (*Dryopteris felix-mas*) and hart's-tongue (*Phyllitis scolopendrium*) are frequent on the brick boundary wall with the West London railway line. A good range of butterflies and moths include the notable purple hairstreak butterfly and moths such as yarrow and oak-tree pugs, autumnal rustic, light brocade, the olive, and the micro-moth (*Teleiodes decorella*). Mammals include common and soprano pipistrelles and woodmouse.
West London Line in Brompton	780m northwest	This rail corridor loosely follows the borough boundary between Kensington & Chelsea and Hammersmith &

Site Name	Approximate Location	Description
(SINC of Borough Grade I Importance)		Fulham. Most of the cuttings along the line are covered with a roughland of bramble scrub, coarse grassland dominated by false oat-grass and stands of tall herbs, particularly Michaelmas daisy (*Aster* sp.). Where concrete or stones replace soil, along the tracks and on a disused platform at Kensington Olympia, there is an ephemeral flora dominated by Canadian fleabane (*Conyza canadensis*) and species of ragwort (*Senecio* spp.). Buddleia is ubiquitous; bushes occur amongst the ephemeral and scrub vegetation and dominate the flora of all the brick walls. Small blocks of sycamore woodland have developed on disused sidings to the north of Kensington Olympia and on the cutting south of Kensington High Street; the latter is interspersed with frequent ash (*Fraxinus excelsior*). An extensive area of neutral grassland occurs on land between West Cromwell Road and Earl's Court Exhibition Building. The grassland has abundant common toadflax (*Linaria vulgaris*), which suggests that the substrate is of low nutrient status and therefore may have a diverse flora. Opposite West Brompton Station a ditch, most of which is in Hammersmith & Fulham, is dominated by great reedmace, with water-plantain and floating sweet-grass and a small stand of common club-rush (*Schoenoplectus lacustris*), which is rare in London. The neutral grassland, in particular, may be valuable for butterflies, grasshoppers and crickets. A variety of breeding birds would be expected to use the scrub and woodland. The ditch could hold breeding amphibians, dragonflies or other notable aquatic invertebrates.
District line north of Fulham Broadway (SINC of Borough Grade I Importance)	810m west	Part of a network of railway lines which criss-cross Hammersmith & Fulham, providing some of the borough's most important wildlife habitats. The District line emerges from a tunnel just north of Fulham Broadway station and runs in a shallow cutting cloaked in dense scrub, mostly of ornamental species planted as part of the station landscaping. Cotoneaster (*Cotoneaster* sp.) and firethorn (*Pyracantha coccinea*) provide abundant berries for birds in autumn.
Battersea Park (SINC of Metropolitan Importance)	1.32km east	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

Site Name	Approximate Location	Description
		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.
Hurlingham Club Grounds (SINC of Borough Grade I Importance)	1.5km southwest	These historic landscaped grounds, a blend of the formal and the wild, contain some good wildlife habitats. The most important wildlife habitat is the southern edge of the grounds, beside the River Thames. Separated from the rest of the grounds by a high earth bank, this narrow strip of woodland floods regularly at high tide, one of very few sections of riverside in central London to do so. Crack-willow dominates near the water's edge, with hawthorn (*Crataegus monogyna*), ash and sycamore on slightly higher ground. The ground flora is composed of wetland species, including hemlock water-dropwort (*Oenanthe crocata*), celery-leaved buttercup (*Ranunculus sceleratus*), wild angelica (*Angelica sylvestris*) and common club-rush (*Schoenoplectus lacustris*), the latter distinctly uncommon in London. The other main feature of wildlife interest is the lake. This supports populations of common waterfowl, including mallards, coots, moorhen, Canada geese and tufted ducks, in addition to a collection of ornamental wildfowl. Marginal vegetation includes great reedmace and marsh marigold (*Caltha palustris*). The rest of the gardens contain notable trees, including several London planes (*Platanus x hispanica*) and a copper beech (*Fagus sylvatica var. purpurea*), as well as dense shrubberies and small areas of woodland. These support a good range of common birds, including great spotted woodpecker, tawny owl, blackcap, treecreeper, chaffinch, goldfinch and bullfinch, all rather scarce in inner London.
Chelsea Physic Garden (SINC of Borough Grade I Importance)	1.6km northeast	This botanical garden has a large number of flowerbeds and shrubberies, some laid out taxonomically or geographically, others to illustrate aspects of herbal medicine or plant conservation. Over 5000 species of plant are on display at any one time. A variety of ornamental trees have been planted throughout the garden, notably a large Pride-of-India (*Koelreuteria paniculata*) and the largest fruiting olive (Olea europaea) in existence out of doors in Britain.

Site Name	Approximate Location	Description
		Two ponds have been planted with native emergent species, including galingale (*Cyperus longus*), lesser reedmace, reed sweet-grass (*Glyceria maxima*), water horsetail (*Equisetum fluviatile*), meadowsweet (*Filipendula ulmaria*), bogbean (*Menyanthes trifoliata*), common club-rush (*Schoenoplectus lacustris*) and purple loosestrife (*Lythrum salicaria*). The garden's flora is highly artificial. Other than lichens, for which the garden is notable, and common ruderals, few species have naturally colonised the Site. The nationally rare spreading hedge-parsley (*Torilis arvensis*) is well naturalised as a flowerbed weed, having been originally planted in the garden. A good variety of species can be found in the garden. There is a large breeding population of common toads, common frogs and smooth newts in the larger pond, and palmate newts were introduced in 1992. A variety of breeding birds includes long-tailed tit (Aegithalos caudatus), which is uncommon in inner London; nest boxes have been erected to encourage breeding birds. Conservation research is carried by the Natural History Museum out in laboratories on the grounds. The botanic garden staff research the history of plant introductions to Britain and breed rare native species for reintroduction. Apart from an annual application of herbicide to the paths, the garden is managed without pesticides; predators are used for pest control.
River Wandle in Wandsworth (SINC of Borough Grade I Importance)	Begins from River Thames at 1.8km southwest and continues south	This site includes the 2.3 kilometres of the river Wandle from the Borough boundary to its tidal limit (excluding the 300 metres which runs in a culvert beneath the Arndale Centre). The tidal section, and small adjacent areas of greenspace including Bell Lane Creek Rough and The Spit, are included in The River Thames and Tidal Tributaries. The banks are largely artificial, though they have some marginal vegetation, and many parts support a diverse community of submerged plants, including the nationally scarce soft hornwort (*Ceratophyllum submersum*), as well as rigid hornwort (*C. demersum*), broad-leaved pondweed (*Potamogeton natans*) and curled pondweed (*P. crispus*), all of which are uncommon in London. Birds seen regularly along the river include kingfisher (*Alcedo atthis*), grey wagtail (*Motacilla cinerea*) and grey heron (*Ardea cinerea*).

Site Name	Approximate Location	Description
Moravian Burial Ground (SINC of Borough Grade II Importance)	780m northeast	The centre of this small burial ground consists of regularly mown grassland, but the edges have been allowed to grow rather more wild, with rough grassland, stands of tall herbs and young trees. The grassland is dominated by cock's foot (*Dactylis glomerata*), false oat-grass and barren brome (*Anisantha sterilis*), with a few associated wild flowers such as common sorrel (*Rumex acetosa*). Particularly notable is an abundance of grey sedge (*Carex divulsa*), which is very scarce in inner London. The remainder of this area has stands of cow parsley (*Anthriscus sylvestris*), upright hedge-parsley (*Torilis japonica*) and rosebay willowherb (*Chamerion angustifolium*), bramble scrub and frequent young sycamore and wild cherry (*Prunus avium*). Scattered mature trees include and old mulberry (*Morus nigra*). The walls are well vegetated, notably with hart's-tongue (*Phyllitis scolopendrium*). A variety of birds and butterflies have been observed.
Clapham Junction Sidings (SINC of Borough Grade II Importance)	1.7km southeast	Wandsworth has a complex network of railways criss-crossing the borough, partly due to the location of Clapham Junction within the borough. This adds up to substantial area of wildlife habitat and provides important wildlife corridors linking the various commons and major wildlife sites together. Much of it is a mix of native and non-native broadleaved woodland and roughland. There are frequent patches of regenerating elm scrub and bracken. Locally scarce plants such as great horsetail (*Equisetum telmateia*) occur in places. The sidings to the east of Clapham Junction station contain large areas of scrub and rough grassland with scattered trees. Foxes are abundant, and the railsides support important populations of birds, including the declining house sparrow (*Passer domesticus*).
Natural History Museum Gardens (SINC of Borough Grade II Importance)	1.95km northeast	The gardens surrounding the front sections of the Natural History Museum are split into two sections. That to the east is more formal and used for public displays and recreation while to the west, a wildlife garden has been created. The wildlife garden contains an amazing variety of habitats given its size and location and acts like an outdoor extension to the Museum. It comprises nine different habitats; urban, chalk grassland, ponds, meadows, oak woodland, acid, hedgerow, reedbed and wet meadow/fen. The range of habitats and the great variety of planted native species is likely to attract a good range of invertebrates and support breeding and

Site Name	Approximate Location	Description
		foraging birds. Mammal surveys reported the presence of low numbers of woodmice, grey squirrels and foxes. The ponds are particularly important for invertebrates, while the bird and mammal populations are outstanding in this part of the Kensington, which is otherwise densely urbanised. The Site appears very suitable for amphibians and if they are not already present introduction could be considered.
King's College (SINC of Local Importance)	240m northwest	The Site has been converted into apartments and houses. The grounds consist of formals gardens and a large pond. Habitats on site include bare artificial habitat, bare soil and rock, planted shrubbery, ruderal or ephemeral vegetation and scattered trees.
Eel Brook Common (SINC of Local Importance)	570m west	Up till the 19th century this was a traditional piece of common land, and used for grazing. Today it is an important open space for public recreation, with something of the character of a village green. The mature London plane trees, which are mainly towards the edges, lend the Site an historic feel. More recent tree planting by the council has focused on native species, which should bring greater wildlife value in the longer term. However, most of the Site is taken up by a large expanse of short mown grass. To the south of the main common, a chain of small green spaces continues alongside the Kings Road. These have rather more extensive tree cover, including some fine old Huntingdon elms (*Ulmus x vegeta*); this is one of the few varieties of elm to survive the Dutch elm disease in the 1970s, which devastated most of the UK's elm trees. The grass here appears to be a little less tightly managed, with lots of spring bulbs bringing colour early in the year.
South Park (SINC of Local Importance)	1.1km southwest	This is the largest public park in the south-east of the Borough of Hammersmith & Fulham. Dating from 1904, it was developed on the Site of a former nursery. The park's southern half and western edges offer the greatest interest for the naturalist, whilst the northern half is dominated by sports pitches. There are plenty of mature trees, especially London planes, plus common lime (*Tilia x europaea*), tree-of-heaven (*Ailanthus altissima*), horse-chestnut and silver birch (*Betula pendul*), and several areas of shrubbery, with many tall evergreens. There are several small fenced off enclosures, which appear to serve as 'quiet gardens'.

Site Name	Approximate Location	Description
		The old brick walls support an interesting range of ferns, including the locally uncommon maidenhair spleenwort (*Asplenium trichomanes*), hart's-tongue (*Phyllitis scolopendrium*) and the widespread male fern (*Dryopteris felix-mas*). Ivy (*Hedera helix*) has been allowed to clamber over some of the walls, providing additional cover for birds. A good range of birds can be seen here, such as goldfinch, greenfinch, robin, great tit and blackbird.
York Gardens (SINC of Local Importance)	1.15km southeast	York Gardens is a small park, adjoining a high rise housing estate, just to the north of Clapham Junction. Shrubberies on the northern and western margins provide some habitat for common birds and invertebrates, whilst also helping to reduce traffic noise from the nearby road. A spinney of silver birch (Betula pendula) and poplar (*Populus* sp.) trees over low bramble and ivy improves the natural quality of the landscaping.
Falcon Park and Shillington Street Open Space (SINC of Local Importance)	1.5km southeast	Two small open spaces, linked by arches in a viaduct and in an area rather deficient in accessible wildlife sites. Large numbers of mostly native trees have been planted, forming borders of shrubs. Mammals such as foxes can also be seen as they use adjacent railways as corridors.
Normand Park (SINC of Local Importance)	1.6km northwest	This small park, in a densely built-up part of Fulham, was developed on a bombed site from the Second World War. It has an emphasis on active recreation, appropriate to its location beside the health club, with a playground, tennis courts and bowling green. The main features of significance for wildlife are the mature trees, for example ash, beech, silver birch and white willow, and an unusual 'living fossil', the maidenhair or gingko tree (Gingko biloba). This tree, which hales from China, is the survivor of a family of trees that were common across much of the world 200 million years ago, before our present day coniferous and deciduous trees had evolved. The park attracts a fair variety of common birds, such as goldfinch, robin, blue tit and great tit. Perhaps more notable at the present time, you may still find a few house sparrows.

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 at site or in the immediate vicinity:

- Chelsea Creek, as part of tidal Thames priority habitat; and
- Railway line with adjacent hedgerow (linear features).

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.

London BAP

The London BAP lists 214 priority species and eight Species Action Plans (SAPs), in addition to four priority habitats and 11 Habitat Action Plans (HAPs). There are also many species listed on the BAP which are priority species and are of conservation concern. Of these, the features of relevance include:

- Bats (SAP);
- House sparrow (*Passer domesticus*) (SAP); and
- Black redstart (*Phoenicurus ochruros*);
- Starling (*Sturnus vulgaris*); and
- Built structures listed as a priority habitat.

Royal Borough of Kensington and Chelsea BAP 2022–2027[9]

Over 35,000 species records, including 96 priority species, have been recorded in the borough and are listed in Appendix 4 of the document. 33 are protected under the Wildlife and Countryside Act 1981 (as amended). The RBKC BAP also includes nine of London's priority habitats, including:

- Parks and urban green spaces;
- Standing water;
- Tidal Thames;
- Wasteland; and
- The built environment.

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 relevance to the Site:

- Bird species including lesser spotted woodpecker (*Dendrocopos minor*), peregrine falcon (*Falco peregrinus*), black redstart, swift (*Apus apus*) and house sparrow;
- Bat species including pipistrelle bat species (*Pipistrellus* sp.), noctule (*Nyctalus noctula*), natterer's bat (*Myotis nattereri*) and brown long-eared bat (*Plecotus auritus*);
- Hedgehog (*Erinaceus europaeus*); and
- Invertebrate species including stag beetle (*Lucanus cervus*).

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 at Figure A.1:

- Buildings;
- Hardstanding;
- Ground level planters;
- Introduced shrub; and
- Mixed scrub

Buildings

During the time of the Site walkover, both temporary and permanent buildings were present on site (Figure B.1-3). The collection of permanent semi-detached buildings (Auction Houses) dominating the northeast corner of the Site holds moderate bat roost potential. The temporary buildings were in various locations across the Site and held no bat roost potential.

Potential roost features around the exterior of the Auction Houses included gaps in brickwork, lifted roof slabs, gaps under lead flashing, and holes in the soffit along the row of shops along Lots Road (Figure B.4-8). The approximate locations of these features are shown at Figure A.2.

Hardstanding

The areas of hardstanding, which are present within the majority of the Site, offer very limited biodiversity value throughout, with short stature ruderal/ephemeral vegetation present through cracks and around the edges, particularly within the car park (Figure B.9). Ruderal/ephemeral species included annual meadow grass (*Poa annua*), wall barley (*Hordeum murinum*) and spreading pellitory (*Parietaria judaica*).

Ground level planters

A minor section of the Site included two small ground level planters to the west of the Site, directly beside the entrance to the car park.

Plant species within the planters included malabar spinach (*Basella rubra*) and large clumps of lavender (*Lavandula angustifolia*), which were observed attracting common invertebrates such as bees and common butterfly species.

Introduced shrub

Small parcels of introduced shrub were present around the edges of the hardstanding and buildings, and in the car park (Figure B.10). Species present included prevalent buddleia and Virginia creeper (*Parthenocissus quinquefolia*) with scattered tree saplings such as maple (*Acer* sp) and common ash (*Fraxinus excelsior*), English ivy (*Hedera helix*) and bramble. The majority of the latter two species were identified as a dense mat along the fence on the western side of the boundary between the Site and the railway line (Figure B.11).

Himalayan balsam (*Impatiens glandulifera*) has also been previously reported but was not identified during the Site walkover.

Mixed scrub

An area of mixed scrub was present directly next to the creek along the southern extent of the Site (Figure B.12).

Species present include prevalent bramble, English ivy (Hedera helix), buddleia with scattered tree saplings including maple (*Acer* sp) and common ash (*Fraxinus excelsior*). Due to the intertidal nature of the creek, these scrub species were interspersed with semi-aquatic or water tolerant vegetation near the tidal margin including common burdock (*Arctium minus*), common mallow (*Malva sylvestris*), purple loosetrife (*Lythrum salicaria*), cow parsnip (*Heracleum spondylium*) and mugwort (*Artemisia vulgaris*).

Several species of bird were identified making use of the scrub, which is discussed in more detail below.

Scattered Trees

Several scattered urban trees were present within the Site boundary including wild service tree (*Sorbus torminalis*) and sycamore (*Acer pseudoplatanus*).

4.3 DETAILED DESCRIPTION OF SITE: SPECIES

Bats

Foraging and commuting

The Site contains a few patches of suitable habitat, particularly to the south around the creekside vegetation. There is also potential to the west (railway line and further mixed scrub just outside site boundary) of the Site. However, street lighting is present along the main road on the eastern side of the Site, and floodlights are present along the road within the Site and in the car park.

Therefore, this site is considered to have **moderate** potential to support commuting and foraging bats.

Roosting

The collection of permanent semi-detached buildings dominating the northeast area of the Site holds bat roost potential with multiple cracks and crevices around the exterior, as previously discussed.

The Site is therefore considered to have **moderate** potential to support roosting bats.

Reptiles

The Site lacks suitable habitat to support reptiles in that it is predominantly hardstanding and buildings. Where small pockets of potentially suitable habitat for reptiles does exist, such as the mixed scrub in the south of the Site, these areas are isolated from any other suitable habitat.

Therefore, this site is considered to have **negligible** potential to support reptiles.

Water Vole and Otter

Due to the presence of the creek, and the bank being within the Site boundary, the likely presence/absence of otter and water vole was assessed during the walkover. Although the waterbody is present, the mixed scrub provides suitable shelter for burrows and the network of tributaries provides commuting and feeding opportunities, the surrounding habitat is highly urban and the Thames network is used recreationally and commercially by boats. Furthermore, there are limited records for both species within 2km of the Site: two for water vole and one for otter.

The Site therefore holds **negligible** potential to support water vole and otter.

Birds

There is potential for nesting birds within the areas of dense vegetation between the Site and the railway line, and also on the creekside (the creek and the railway line lie within the 5m buffer zone). The mass of bramble and ivy to the western stretch of the Site directly beside the railway line was observed to support species such as robin (*Erithacus rubecula*) and blue tit (*Cyanistes caeruleus*). Two additional bird species were observed making use of the auction house roof: feral pigeon (*Columba livia*) and blackbird (*Turdus merula*) (Figure B.13).

Several species of bird were observed making use of the creekside vegetation, including greenfinch (*Chloris chloris*) and pied wagtail (*Motacilla alba*). Two wildfowl species were also observed using the creekside as well as the creek itself: moorhen (*Gallinula chloropus*) and a pair of mute swans (*Cygnus olor*) with two cygnets (Figure B.14), indicating suitability for nesting birds.

Therefore, this site holds **high** potential to support nesting birds.

Invertebrates

The majority of the Site is highly urban and contains little in the way of vegetation to support common invertebrates, apart from the limited flowering species contained within the ground level planters. However, the mixed scrub to the south of the Site was observed to support substantial numbers of common invertebrates.

Therefore, this site holds **negligible** potential to support notable invertebrates.

Invasive/Non-native species

Two invasive species were identified on site during the Site walkover: Virginia creeper (Figure B.15), which is listed on Schedule 9 in the UK Wildlife and Countryside Act (1981) as amended, and buddleia (Figure B.16). Both species are category 3 listed species which fall under the London Invasive Species Initiative (LISI)[10]. Category 3 species are those "*Species of high impact or concern which are widespread in London and require concerted, coordinated and extensive action to control/eradicate*". The location of the main mat of Virginia creeper is shown by target note 1 on Figure A.2.

The continuous mat of Virginia creeper was exclusive to the area of mixed scrub in the southwest corner of the Site by the creek and along the fence, whereas large stands and small sprouts of buddleia were present throughout the Site.

Himalayan balsam, also listed on Schedule 9 in the UK Wildlife and Countryside Act (1981) as amended, although not identified during the Site walkover, has previously been reported within the mixed scrub, and therefore its presence is assumed for caution.

Therefore, there is a **confirmed** presence of invasive species on the Site.

Other BAP Species

There are five records of hedgehog within 2km of the Site. There are limited suitable habitats for hedgehog on site: the hedgerow on the western fence and the patch of mixed scrub to the south of the Site, which provide suitable refuge and foraging habitat. These are poorly connected to other suitable habitats in the wider landscape. In addition, there is a busy main road running alongside the eastern stretch of the Site which creates a barrier.

The Site is therefore considered to provide **negligible** potential to support hedgehogs.

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	Comments
Designated Sites: Non-Statutory	Confirmed within 2km	There are 20 non-statutory designations located within 2km of the Site boundary. The majority of these are more than a km away and separated from site by dense urban development with associated infrastructure. As such, the proposed development is unlikely to have an impact on most of these non-statutory designated sites. The exception to this is the small number of non-statutory designated sites which border the Site. The proposed development could have an impact on these adjacent/close sites. Mitigation measures to eliminate/minimise the impact of the proposed development on these non-statutory designated sites is provided in Section 5.2.
Notable/Rare Habitats	Confirmed	The railway line and hedgerow along the adjacent fence, as well as creek directly outside the Site boundary, are assumed to be impacted by the proposed works. Recommendations to ensure minimal disturbance are set out within this report and are also required to be included within the CEMP.
Commuting and Foraging Bats	Moderate	The railway line and vegetated fence mentioned above provide a linear feature for commuting and foraging bats. The creek, although not itself within the Site boundary will attract nocturnal flying insects and therefore provide foraging opportunities around the area. Recommendations to ensure the suitability for foraging and commuting bats is

Receptor	Presence/Potential Presence	Comments
		retained and enhanced due to the development are set out below. In addition, to enhance the value of the Site and the greenspaces on and adjacent to the Site for bats, mitigation recommendations for an appropriate lighting scheme have been included within this report.
Roosting bats	Moderate	The permanent buildings on site are considered to hold moderate potential to support roosting bats, therefore two emergence surveys have been recommended. Following the completion of these surveys, a Bat Report of the results and specific recommendations will be submitted in support of the application.
Birds	High	Vegetation clearance should take place outside of the bird breeding season (March - August). If this is not possible, clearance should be undertaken within 24 hours following a nesting bird survey by an ecologist. Specific recommendations associated with vegetation clearance and enhancement measures to improve the value of the Site for birds are included within this report.
Invasive/Non-native species	Confirmed	There are three invasive species present on site: buddleia, Virginia creeper and Himalayan balsam (previously reported to be on site but not observed on the day of the Greengage site walkover). Care must be taken during works for all three species, and the recommendations included within this report should be followed.

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.

Designated sites

There are 20 non-statutory designations located within 2km of the Site boundary.

Chelsea Creek, although not within the Site itself, is part of the River Thames and tidal tributaries SINC of Metropolitan Importance. As it lies within the direct vicinity, it will therefore be considered during construction. It is recommended that plans to reduce surface run off and dust pollution are detailed within the CEMP.

Bats

Foraging and Commuting

Further surveying for foraging and commuting bats is not required. However, owing to the presence of two notable habitats in the direct vicinity of the Site, bat-sensitive lighting and roosting boxes should be incorporated and adopted into the scheme where appropriate to minimise any potential impacts of increased lighting levels on foraging, commuting and socialising bats.

The following recommendations and guidance for the design of wildlife friendly lighting on site is provided by the Institute of Lighting Professionals (ILP) and BCT[11]:

- Use of low-UV warm-white LED bulbs with low illumination/LUK levels;
- Use of directional, downward facing and shielded lights (Figure B.17) which point away from green features such as trees or areas of soft landscaping where possible and where health and safety restrictions allow;
- External lights on curfew controls/movement sensors to be considered where possible to reduce light pollution when not needed; and
- Green infrastructure should remain unlit where possible and where health and safety restrictions allow, particularly between April and October, inclusive.

Roosting

Due to the moderate potential on site owing to the extensive features on the main building, two dusk emergence surveys will take place. These will be undertaken in accordance with the BCT Good Practice Guidelines[1].

Reptiles

No further surveys for reptiles are deemed necessary. However, care must be taken during any vegetation clearance, particularly within the area of dense scrub to the south of the Site.

Birds

The Site contains areas suitable to support nesting birds, namely the scrub habitat and to a lesser extent the buildings. Given the legislation afforded to nesting birds it is recommended that any site clearance works, which would impact upon suitable nesting bird habitat, is undertaken outside of the nesting bird season (nesting bird season generally considered to occur between March to August inclusive). If this is not possible and habitat clearance is required during March to August

inclusive, any suitable nesting bird habitat should be checked by a Suitably Qualified Ecologist immediately prior to any clearance work and no more than 24hrs in advance.

Invasive/Non-native species

Two invasive species were observed on site: buddleia and Virginia creeper. An additional invasive species, Himalayan balsam, was reported by an individual on site prior to the Site walkover. Although it was not observed during the Site walkover, its presence on site must be assumed.

It is important to remove these species considerately from the Site during the clearance works and destroyed in such a way that prevents their spread, while following guidance from LISI[10] and DEFRA[12] respectively.

LISI also details actions to help prevent, control and, where feasible, eradicate invasive non-native species in London. The following steps should be taken before, during and after site clearance to help with controlling the species:

- Identify areas where these species are present and assess their risk and how they would be spread;
- Set up monitoring schemes on site; and
- Raise awareness through notices on site to help prevent the spread.

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 a minimum of 10% net gain in biodiversity, which should be evidenced through a Biodiversity Net Gain Assessment (BNGA).

To enable proposals to deliver the desired net gains, the below measures should be considered for incorporation into the landscaping plans, and for the benefit of nesting birds and roosting, commuting and foraging bats:

- A wildlife-friendly lighting regime should be implemented, as previously described, for commuting and foraging bats;
- Biodiverse roofs;
- Vertical greening;
- Bat and bird boxes (Figure B.18) and
- Enhanced wildlife-friendly landscaping.

The above recommendations should be adhered with during the demolition and construction works to ensure no impact from an ecological perspective with opportunities for ecological improvements to be integrated within the future design.

6.0 SUMMARY & CONCLUSION

Greengage was appointed by Mount Anvil (Lots Road) LLP (the 'Applicant') to undertake a PEA, to support the consideration of proposals to transform Lots Road South in West Brompton, 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 potential for a number of notable and protected habitats and species, including:

- Chelsea Creek - part of the River Thames network of SINCs;
- Railway line and adjacent hedgerow - linear feature for commuting bats;
- Roosting and foraging/commuting bats; and
- Nesting birds.

Two dusk emergence surveys will take place to determine the presence/absence of roosting bats within the main buildings. The results of these surveys will be used to inform the need for additional mitigation and compensation actions required to allow the works to proceed.

Mitigation actions for ecological receptors on site have already been identified and should be included in a CEMP (which will be secured by planning condition), including:

- Undertaking vegetation clearance and/or building development/refurbishment works outside of the nesting bird season (March-August); and
- Removing any invasive species according to LISI and DEFRA guidance.

The ecological enhancements specified in this report target UK, London and RBKC BAP species, to help enhance the qualitative biodiversity value of the Site. These enhancement measures should be described in detail, along with the management prescriptions, within an EMP, which should also be secured by condition:

- Provision of bird and bat boxes;
- Provision of wildlife-sensitive lighting; and
- Provision of biodiverse roofs and vertical greening.

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 a minimum of 10% net gain in biodiversity, which should be evidenced through a Biodiversity Net Gain Assessment (BNGA).

APPENDIX A HABITAT MAP AND POTENTIAL ROOST FEATURES

Figure A.1 Site plan and habitat map

LOTS ROAD SOUTH

- Red Line Boundary
- Scattered trees
- Developed land; sealed surface
- Ground level planters
- Introduced shrub
- Mixed scrub
- Building

Title: Figure A.1 Habitat Map

Drawn by: IN
Date: 12/06/2023

Reviewed by: GA
Date: 12/06/2023

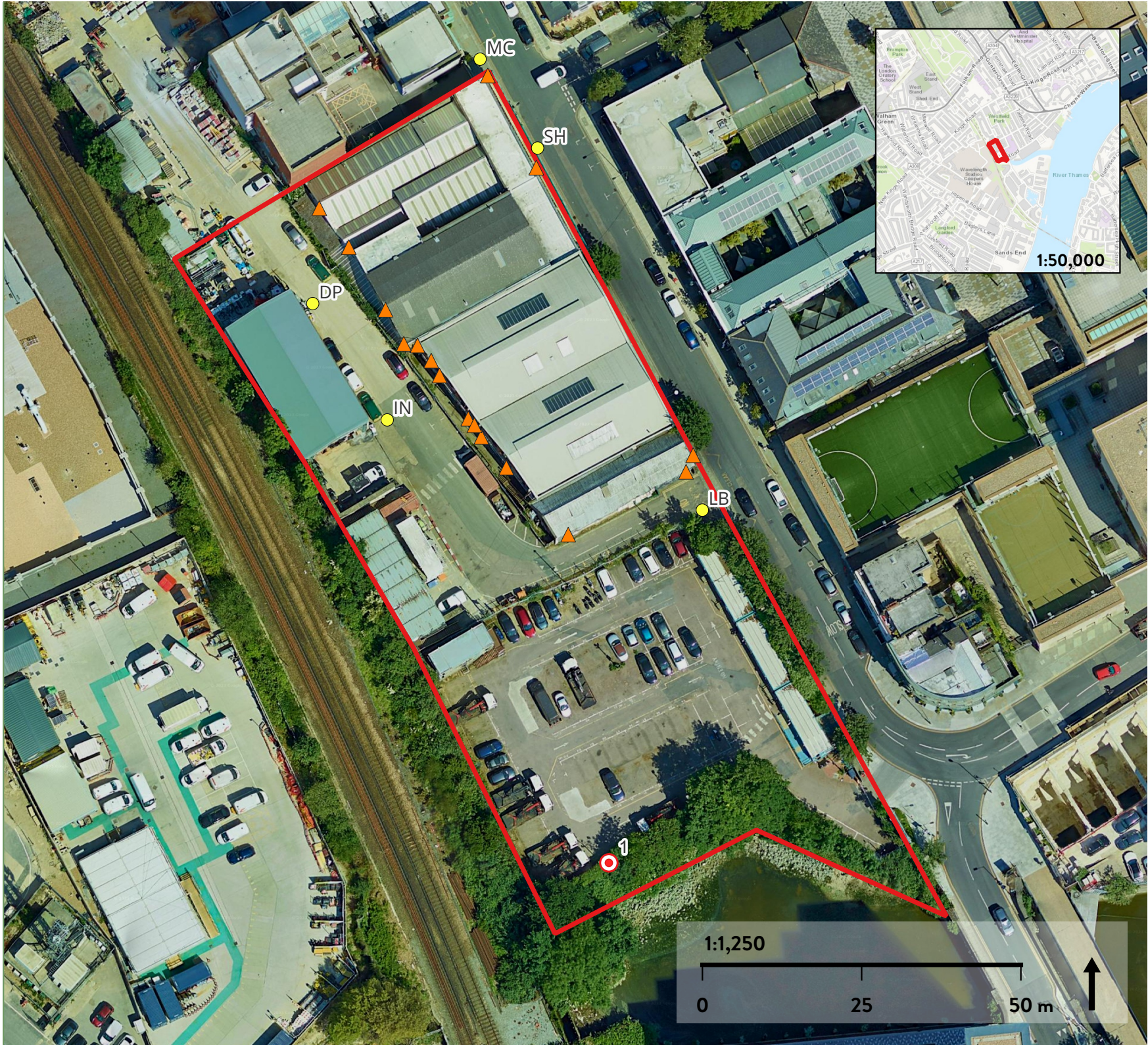
Project number: 552380
Sources: Google Satellite, ESRI World Topo

Greengage

Figure A.2 Potential roost features

LOTS ROAD SOUTH: POTENTIAL ROOST FEATURES

- Approximate red line boundary
- Target note
- Potential roost features
- Surveyor locations



Title: Figure A.2 Potential roost features

Drawn by: IN
Date: 17/08/2023

Reviewed by: GA
Date: 17/08/2023

Project number: 552380
Sources: Google Satellite, ESRI World Topo

Greengage

APPENDIX B SITE PHOTOGRAPHS

Figure B.1 Main stretch of permanent buildings along Lots Road, including the Auction House (east side)

Figure B.2 South end of permanent buildings opposite the car park

Figure B.3 West side of permanent buildings, where the majority of the potential roost features were observed

Figure B.4 Broken grate on the south end of the main stretch of buildings along Lots Road

Figure B.5 Gaps between brickwork and pipe along the western stretch of the auction houses - there are several of these

Figure B.6 Cracks in brickwork along the western stretch of the Auction Houses

Figure B.7 Gap under lead flashing at the corner of a pitched roof on the southwest side of the Auction Houses

Figure B.8 Soffit hole on the far northeast corner of the Auction Houses along Lots Road

Figure B.9 A section of the car park, including one of the temporary office buildings. The wall at the back cordons off the southern area of the Site containing the creekside scrub.

Figure B.10 Parcel of short ephemeral /tall ruderal introduced shrub in the car park down the side of a temporary building on the western side of the Site

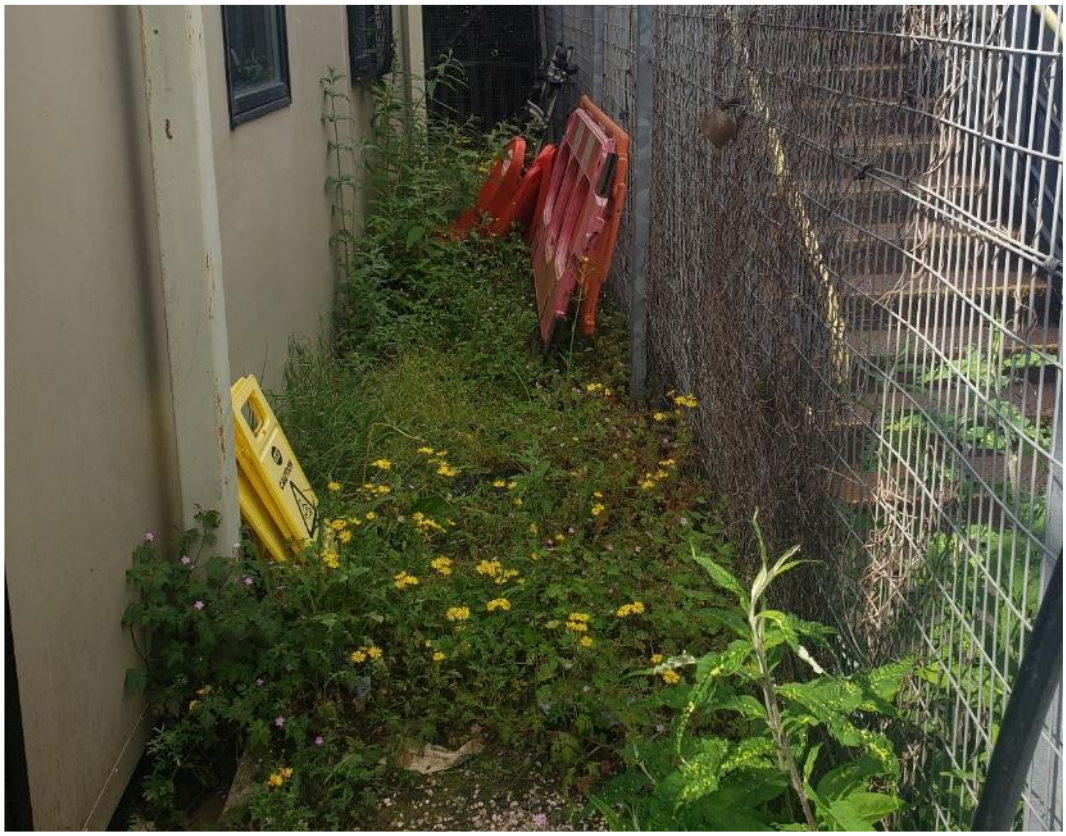


Figure B.11 One section of the dense hedge of introduced shrub (mainly bramble and ivy) on the western boundary, along with a line of short ephemeral vegetation

Figure B.12 A section of the creekside mixed scrub, showing the creek

Figure B.13 Feral pigeons making use of the Auction House roof

Figure B.14 Two mute swans either side of two cygnets by the creekside - photograph taken from the other side of the creek

Figure B.15 Mat of Virginia Creeper to the south of the Site - continues ahead and round along the western boundary

Figure B.16 A collection of Buddleia stands within the mixed scrub to the south - many of these around the Site

Figure B.17 Low lighting LED bollards that sit below waist height and angle light downwards for around car parking.

Figure B.18 Example of a bat (left) and bird (right) box as a mitigation measure

APPENDIX C RELEVANT LEGISLATION AND POLICY

C.1 LEGISLATION

Current key legislation relating to ecology includes The Environment Act[13] Wildlife and Countryside Act 1981 (as amended)[14]; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')[15], The Countryside and Rights of Way Act 2000 (CRoW Act)[16], and The Natural Environment and Rural Communities Act, 2006[17].

The Environment Act, 2021

Under the Environment Act 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, 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 off-site compensation, or the purchase of statutory credits.

The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the 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)[18], and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')[19], and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')[20] 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[21] (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[22] (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework[23] (and Biodiversity 2020 strategy[24] in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020[25] and EU Biodiversity Strategy (EUBS)[26], 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.

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 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.

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.

Legislation Relating to Invasive Non-native Species

Section 14 of the Wildlife and Countryside Act 1981 (as amended) prevents the release into the wild of certain plants and animals which may cause ecological, environmental or socio-economic harm. It prohibits the introduction into the wild of any animal of a kind which is not ordinarily resident in, and is not a regular visitor to, Great Britain in a wild state, or any species of animal or plant listed on Schedule 9 of the Act. In the main, Schedule 9 lists non-native species that are already established in the wild, but which continue to pose a conservation threat to native biodiversity and habitats, such that further releases should be regulated. The Schedule also includes some native species (for example barn owl) in order to provide a level of control to ensure that releases, in particular reintroduction programs, are carried out in an appropriate manner and biodiversity is properly safeguarded.

C.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2021[27] 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[28]

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.

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[29]

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

Royal Borough of Kensington and Chelsea Local Plan 2024[30]

GB10: Light Pollution

A. Development must not create an unacceptable impact from light glare and light spill on local residential amenity including neighbouring properties and communal gardens, biodiversity, highway and waterway users.

GB12: Sustainable Drainage

A. Development must contribute towards a reduction in the rate and volume of surface water run-off into the combined sewer network through measures that promote multifunctional benefits.

Run-off rates

B. Development proposals must aim to achieve greenfield run-off rates. Householder applications must reduce the rate of runoff from the Site in a way that is proportionate to the scale of development and reflects the Site constraints.

C. Only where it can be clearly demonstrated that the on-site reduction in surface water runoff to greenfield rates is not feasible or appropriate, such as where there is limited capacity for SuDS with multifunctional benefits, may financial contributions be provided by the developer towards the delivery of SuDS in the locality.

SuDS design and details

D. Surface water run-off must be managed as close to its source as possible (following the London Plan SuDS hierarchy), through:

    1. Storing rainwater for later use (such as rainwater harvesting for irrigation or domestic water butts).
    2. An increase of permeable or porous surfaces and green infrastructure, including trees and urban hedgerows, to enhance natural drainage.
    3. The implementation of green/blue roofs on all flat roofs including extensions.

4. Including at least one SuDS element that provides other environmental benefits.
5. Prioritising sustainable, natural green SuDS, over engineered options (underground attenuation tanks or oversized pipes).
6. Supporting water efficiency measures, the reuse of greywater and water harvesting measures to reduce water demand and sewerage flows.

E. SuDS proposals must be adequately designed, built and maintained for the lifetime of the development.

F. Impermeable surfaces in gardens and landscaped areas will not be permitted as part of a development.

G. The Council supports the retrofitting of SuDS in any development (even if the proposed development will not have drainage implications).

GB14: Green and Blue Infrastructure

A. Development will be required to contribute to the greening of the borough, enhance habitat to increase biodiversity, and protect/enhance any nearby waterways.

Green Infrastructure

B. Development proposals are required to maximise opportunities to incorporate green infrastructure with arrangements in place for its long-term maintenance.

C. Major residential development is required to achieve an Urban Greening Factor score of 0.4.

D. Major non-residential development is required to achieve an Urban Greening Factor score of 0.3.

E. Green infrastructure and landscaping must be designed to:

1. Be fit for purpose and function.
2. Be of a high quality and compatible with the surrounding landscape, and townscape character.
3. Integrate with the drainage network to mitigate the effects of climate change and significant rainfall events.
4. Be clearly defined as public or private space.
5. Optimise the benefit to wildlife habitat including biodiversity net gain.
6. Prioritise tree planting.

<u>Biodiversity</u>

F. Development proposals must protect the biodiversity in, and adjacent to, the borough's Sites of Importance for Nature Conservation (SINCs).

G. Development proposals will be required to create opportunities to extend or link Green Corridors and the Blue-Ribbon Network.

H. A site-specific Ecological Impact Assessment is required to be undertaken and submitted for all major development.

I. Relevant development, including major development, must achieve a minimum on-site biodiversity net-gain of 10 per cent.

J. Where it has been robustly demonstrated that a minimum of 10 percent biodiversity is not achievable on a site, adequate mitigation should be provided on an alternative site or as a last resort compensate using the biodiversity credit system.

K. A Biodiversity Net Gain Strategy is required for development adjacent to the River Thames.

Blue Infrastructure

L. Development proposals adjacent to the Blue Ribbon Network (River Thames, Chelsea Creek and the Grand Union Canal) must safeguard and take opportunities to improve public access, protect and enhance heritage and biodiversity value, as well as promote their use for education, tourism, leisure and recreation, health, wellbeing and transport for both passengers and freight.

M. New moorings on the River Thames and Chelsea Creek will only be considered in exceptional circumstances where applicants can demonstrate that there will be:

1. No detrimental effect on the river as a transport route.
2. No detrimental impact in the River Thames foreshore an important and often protected habitat.
3. No adverse affect on the character or appearance of existing residential moorings.
4. Safe access and egress from the mooring can be maintained at all times without impacting on, or preventing, future raising of the flood defences

N. New residential moorings on the Grand Union Canal will be permitted provided that:

1. There are adequate services for permanently moored vessels; and,
2. Other canal users (both water and land based) are not adversely affected.

GB16: Trees

Protection of Trees

The Council will resist the loss of trees of value, based on amenity, historic or ecological value.

A. Exception to criterion A above will be where:

1. The tree is dead, dying or dangerous.
2. The tree is demonstrated as causing significant damage to adjacent structures.
3. Felling is for reasons of good arboricultural practice.

B. Resist development which results in the damage or loss of trees of townscape or amenity value, or gives rise to the threat, immediate or long term, which affects the continued well-being of such trees.

C. Trees must be adequately protected throughout the course of development, including identified Root Protection Areas.

D. The Council will serve Tree Preservation Orders or attach planning conditions to protect trees of townscape or amenity value that are under threat from development, inappropriate pruning works or removal.

Loss of Trees

E. Require where practicable an appropriate replacement of a suitable size for any tree that is felled and that safeguarding measures are implemented to ensure that the tree has the best possible opportunity of reaching maturity.

F. Where the loss of a tree is unavoidable the Council will require that any new tree compliments existing trees and assists in creating new, high quality green areas which deliver amenity and biodiversity benefits.

G. New trees must be of a suitable species for the location and be compatible with the surrounding landscape and townscape, mitigate the effects of climate change and significant rainfall events.

London Borough of Hammersmith and Fulham Local Plan 2018[31]

POLICY OS1 PARKS AND OPEN SPACES

The council will protect, enhance and increase provision of parks, open spaces and biodiversity in the borough by:

A. designating a hierarchy of open space that includes metropolitan open land (MOL), open space of borough wide importance and open space of local importance as well as a hierarchy of nature conservation areas of metropolitan, borough and local importance, and green corridors along the borough's railway lines;

B. requiring a mix of new public and private open space in the White City and Earls Court and West Kensington Opportunity Areas and the South Fulham Riverside Regeneration Area and in any new major development; and

C. improving existing parks, open spaces and recreational facilities throughout the borough.

POLICY OS2 ACCESS TO PARKS AND OPEN SPACES

The council will seek to reduce open space deficiency and will protect and enhance the quality of, and access to, existing open space by:

A. refusing development on public open space and other green open space of strategic and borough-wide importance as identified in the council's Open Space Hierarchy unless it can be demonstrated that such development will not harm its open character, and its function as a sport, leisure or recreational resource, and its contribution to biodiversity and visual amenity;

B. refusing development on open space that is not identified in the Local Plan where such land either on its own or cumulatively has local importance for its open character or as a sport, leisure or recreational facility, or for its contribution to local biodiversity or visual amenity unless:

   1. the proposed development would release a site for built development needed to realise a qualitative gain for the local community in pursuance of other physical, social and economic objectives of the Local Plan and provision is made for replacement of open space of equal or greater value elsewhere.

C. requiring provision of accessible and inclusive new open space in major development, particularly within the council's regeneration areas; and

D. seeking improvements to existing open space and the facilities within them, such as Linford Christie Stadium, where appropriate and when development proposals impact upon provision.

POLICY OS3 PLAYSPACE FOR CHILDREN AND YOUNG PEOPLE

Development proposals should not result in the loss of existing children and young people's playspace or result in an increased deficiency in the availability of such playspace.

In new residential development that provides family accommodation; accessible and inclusive, safe and secure communal playspace will be required on site that is well designed and located and caters for the different needs of all children, including children in younger age groups, older children, teenagers and disabled children. The scale of provision and associated play equipment will be in proportion to the scale and nature of the proposed development.

POLICY OS4 NATURE CONSERVATION

The nature conservation areas and green corridors identified on the Policies Map will be protected from development likely to cause demonstrable harm to their ecological (habitats and species) value. In these areas, development will not be permitted unless:

A. the proposed development would release a site for built development needed to realise a qualitative gain for the local community in pursuance of other physical, social and economic regeneration objectives of the Local Plan, and measures are included for the protection and enhancement of any substantive nature conservation interest that the site may have so that there is no net loss of native species and no net loss of habitat; or

B. provision is made for replacement nature conservation interest of equal or greater value elsewhere in the locality.

Outside of the areas identified on the Policies Map, proposals should enhance the nature conservation interest through initiatives such as new green infrastructure and habitats, tree planting and brown and green roofs and protect any significant interest on the site and any nearby nature conservation area, appropriate to the scale and nature of the development.

Planning conditions will be imposed, or planning obligations sought to ensure the maintenance and enhancement of nature conservation areas where these are affected by development proposals.

POLICY OS5 GREENING THE BOROUGH

A. The council will seek to enhance biodiversity and green infrastructure in the borough by: maximising the provision of gardens, garden space and soft landscaping, seeking green or brown roofs and other planting as part of new development;

B. protecting back, front and side gardens from new development and encouraging planting in both back and front gardens;

C. seeking to prevent removal or mutilation of protected trees;

D. seeking retention of existing trees and provision of new trees on development sites;

E. adding to the greening of streets and the public realm; and

F. making Tree Preservation Orders where justified in the interests of amenity.

POLICY RTC1 RIVER THAMES

The council will work with its partner organisations, including the Environment Agency, Port of London Authority, Thames Water and landowners to enhance and increase access to, as well as use of, the waterways in the borough, namely the River Thames, and improve waterside environments by:

A. identifying the Thames Policy Area on the Policies Map and setting out general criteria for the design of development in this area, in this Local Plan;

B. encouraging the development of vacant or underused land along the waterways, namely the River Thames, Chelsea Creek and taking into account their local context and character;

C. protecting existing water dependent uses and requiring new development to provide opportunities for water based activities where appropriate and enhance river and canal related biodiversity, safeguard and enhance where necessary flood defences, as well as encouraging public access especially for leisure and educational activities;

D. ensuring the provision, or improvement and greening, of the Thames Path National Trail (the riverside walk) in all riverside developments ;

E. promoting use of the River Thames for transport uses, including passengers and freight; and

F. seeking improvements to the tidal foreshore in line with the requirements of the Thames River Basin Management Plan and the Thames Estuary 2100 Plan.

POLICY RTC2 ACCESS TO THE THAMES RIVERSIDE AND FORESHORE

The council will seek accessible and inclusive public access to the riverside, including through-site links when riparian development takes place and the provision and enhancement of the Thames Path National Trail (the riverside walk). It will also seek the retention and enhancement of access to and from the foreshore in development schemes where it is appropriate and safe to do so, and will promote enjoyment of riverside heritage assets and open spaces.

The riverside walk should generally be at least 6 metres wide and should be accessible to cyclists if this can be achieved without risk to the safety of pedestrians or river users.

All proposals will need to ensure that flood defences are not adversely affected.

POLICY RTC3 DESIGN AND APPEARANCE OF DEVELOPMENT WITHIN THE THAMES POLICY AREA

Development will not be permitted within the Thames Policy Area as shown on the Policies Map, unless it:

1. respects the riverside, including the foreshore, context and heritage assets;

2. is of a high standard of accessible and inclusive design; and

3. maintains or enhances the quality of the built, natural and historic environment.

The council will encourage the greening and naturalising of the river bank and/or flood defences with reference to the Thames Estuary 2100 Plan to create habitats for wildlife and improve the visual attractiveness of the area. Schemes that meet these requirements, and, by their design, contribute to creating an attractive, safe and interesting riparian environment will be welcomed. The council will require the submission of a design and access statement as part of a planning application within the Thames Policy Area.

POLICY RTC4 WATER-BA SED ACTIVITY ON THE THAMES

Development will not be permitted if it would result in the loss of existing facilities in the river for water-based activities and uses, unless the facilities are demonstrably surplus to current or anticipated requirements, or unless alternative facilities of similar or greater utility are to be provided. Specific requirements regarding development of the borough's three safeguarded wharves are set out in the London Plan.

Developments that include provision in the river for water-based and river-related activities and uses, including new permanent moorings, passenger services, and for facilities associated therewith, particularly where these would be publicly accessible, will be welcomed, provided:

A. they are suitably located and compatible with the character of the river, the riverside, and the importance of the river as a wildlife habitat;

B. they do not impede or give rise to hazards to navigation, water flow, the integrity of flood defences or public safety; and

C. they accord with other objectives and policies of the Plan.

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