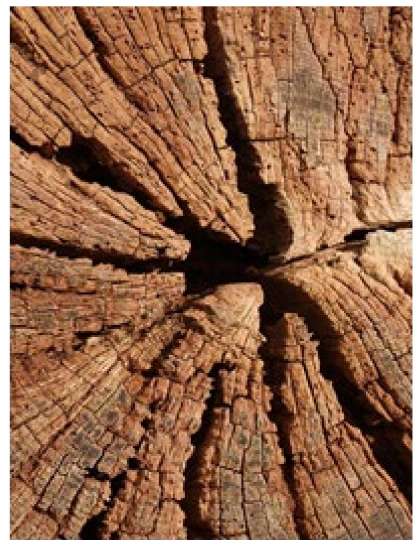
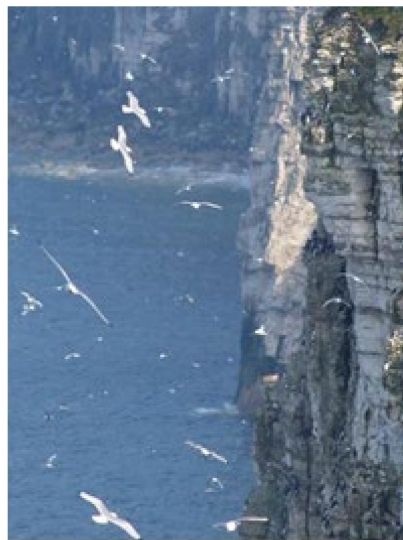




Preliminary Ecological Appraisal and
Preliminary Roost Assessment

**Century Youth House, Albert
Road, Romford**

For

Mercury Land Holdings Ltd

Report Ref.: MER002-004-001/001/002

November 2024

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Project Number	Report No.
MER002-004-001	001

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1. Summary

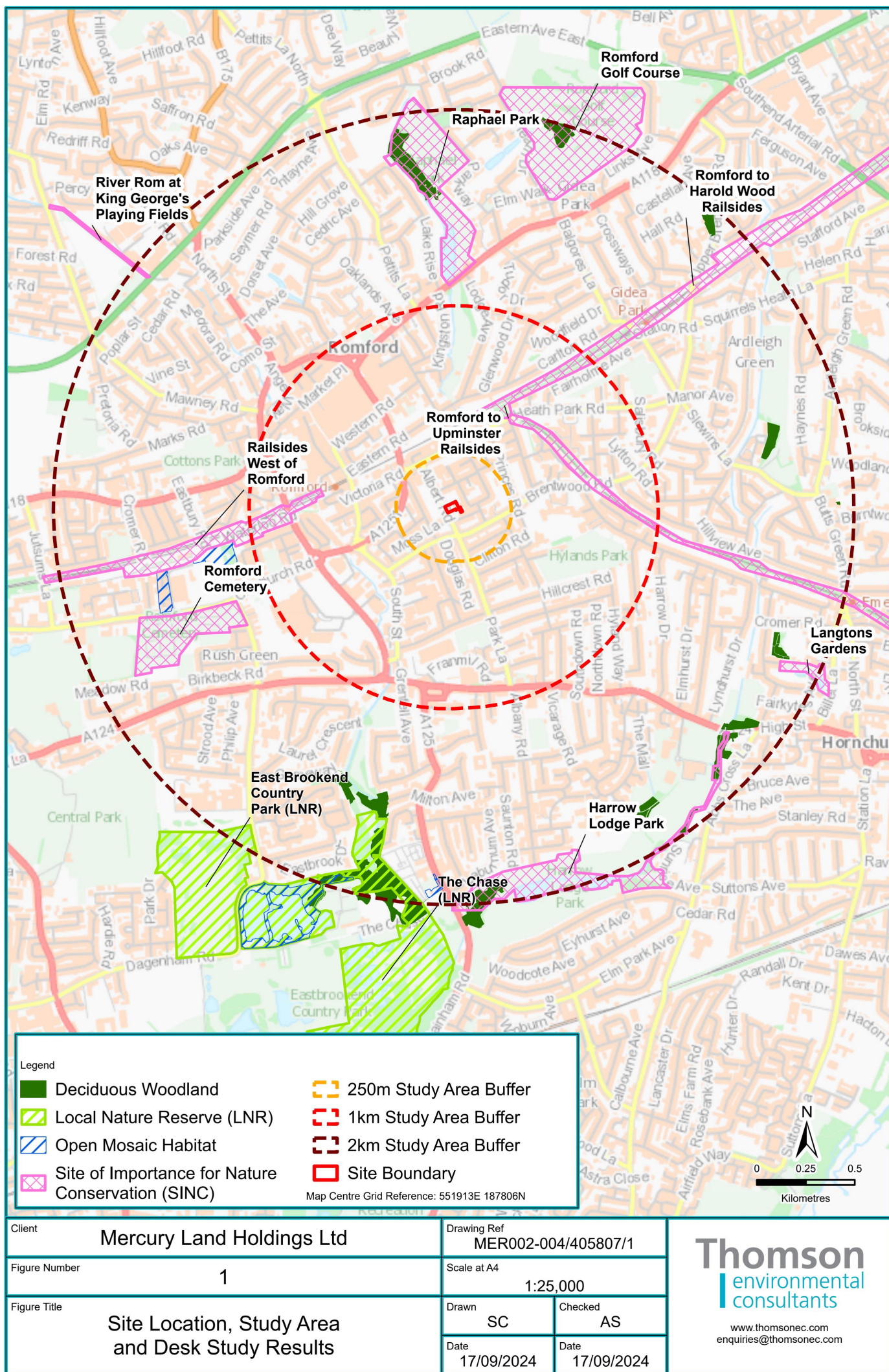
- 1.1.1 Mercury Land Holdings Ltd is preparing a planning proposal for the construction of nine new residential dwellings on a 0.24 ha site at the Youth Century House, Albert Road, Romford, Greater London, RM1 2PS. The site location is shown on Figure 1. The site currently consists of four buildings, and hard standing areas with scattered non-native scrub. The proposals include the partial demolition of the buildings and the construction of nine new dwellings with access, parking and private gardens.
- 1.1.2 Thomson Environmental Consultants was commissioned to undertake a Preliminary Ecological Appraisal of the site, including an ecological desk study, habitat survey and assessment of the sites baseline biodiversity value, and a Preliminary Roost Assessment survey for bats.
- 1.1.3 As shown on Figure 1, records for designated sites and priority habitats were collated for a 2 km study area. Protected species and species of conservation concern records were requested for a 1 km study area. A search was also undertaken for the presence of waterbodies within a 250 m study area.
- 1.1.4 A habitat survey, using the UK Habitat Classification (UKHab) methodology, was undertaken during a site visit. The habitats on site were found to be predominantly buildings, sealed surfaces and sparsely vegetated urban land, with a small section of modified grassland in the west of the site, which also supports a single urban tree.
- 1.1.5 Two buildings (B1 and B2) were recorded to have high suitability, one building (B3) with moderate suitability, and another building (B4) with negligible suitability to support roosting bats were noted during the PRA survey. Suitable habitat for nesting birds in the form of scrub and buildings was also noted.
- 1.1.6 In the absence of mitigation, development of the site could result in an adverse effect on biodiversity, including offences under legislation and a contravention of planning policy regarding protected species and species of conservation concern.
- 1.1.7 Table 1.1 summarises the main findings, plus recommendations designed to enable compliance of the project with regards to legislation and planning policy in relation to ecological features and biodiversity. Further avoidance, mitigation or compensation measures may be required following any further surveys.
- 1.1.8 As shown in Table 1.2, baseline biodiversity unit values were calculated for the site using the statutory biodiversity metric.

Table 1.1: Summary of results and recommendations

Ecological Feature	Desk and Field Study Summary	Recommendations
Statutory designated sites	The nearest statutory designated site is The Chase Local Nature Reserve (LNR).	Control of off-site emissions of sediment, dust and chemicals.
Non-statutory designated sites	The nearest non-statutory designated site is The Chase and East-Brookend Country Park.	Control of off-site emissions of sediment, dust and chemicals.
Priority habitats and ancient woodland	There is Deciduous Woodland, and Open Mosaic Habitat on within 2 km of the site.	Control of off-site emissions of sediment, dust and chemicals.
Birds	Several records of bird species were returned in the desk study and there is suitable nesting habitat for common species on site.	Clearance of suitable nesting habitat outside of the bird breeding season or nesting bird checks prior to removal of buildings or any vegetation above 500mm in nesting season.
Bats	Records of bat species were returned in the desk study and suitable habitat for roosting bats is present on site.	Dusk emergence surveys have been recommended for Buildings B1, B2 and B3.
Hedgehog	Records within study area were returned from the desk study.	Check of suitable habitat in advance of works and relocation if required
Invasive plant species	Virginia-creeper, and buddleia, both non-native invasive plants and green alkanet, an invasive plant included in London invasive species initiative, were recorded on site.	Control of invasive species in accordance with best practice guidance.
Biodiversity enhancement/net gain	National and local planning policy requires biodiversity net gain. See headline results below.	A plan should be prepared to demonstrate how the development will achieve a biodiversity net gain.

Table 1.2: BNG baseline results

Unit Type	Baseline Units	Units required for 10% net gain
Habitat	0.34	0.37
Hedge	0.00	0
Watercourse	0.00	0



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- Legend
- Urban Tree
 - u1e - Built Linear Features (Fence)
 - u1e - Built Linear Features (Mortared Wall)
 - Target Note
 - g4 - Modified Grassland
 - u1b - Developed Land, Sealed Surface
 - u1b5 - Buildings
 - u1f - Sparsley vegetated urban land
 - Site Boundary

Map Centre Grid Reference: 551936E 188345N

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This map has been drawn at a sufficient level of accuracy to fulfil the requirements of a UK Habitat Classification survey. The level of accuracy depends on both the size of the area involved and the base mapping. Every effort has been made to create a map that is as accurate as possible. However, this map is not intended to represent a scaled landscape survey so should not be used to pin-point accurate engineering work or as a basis for detailed site planning.

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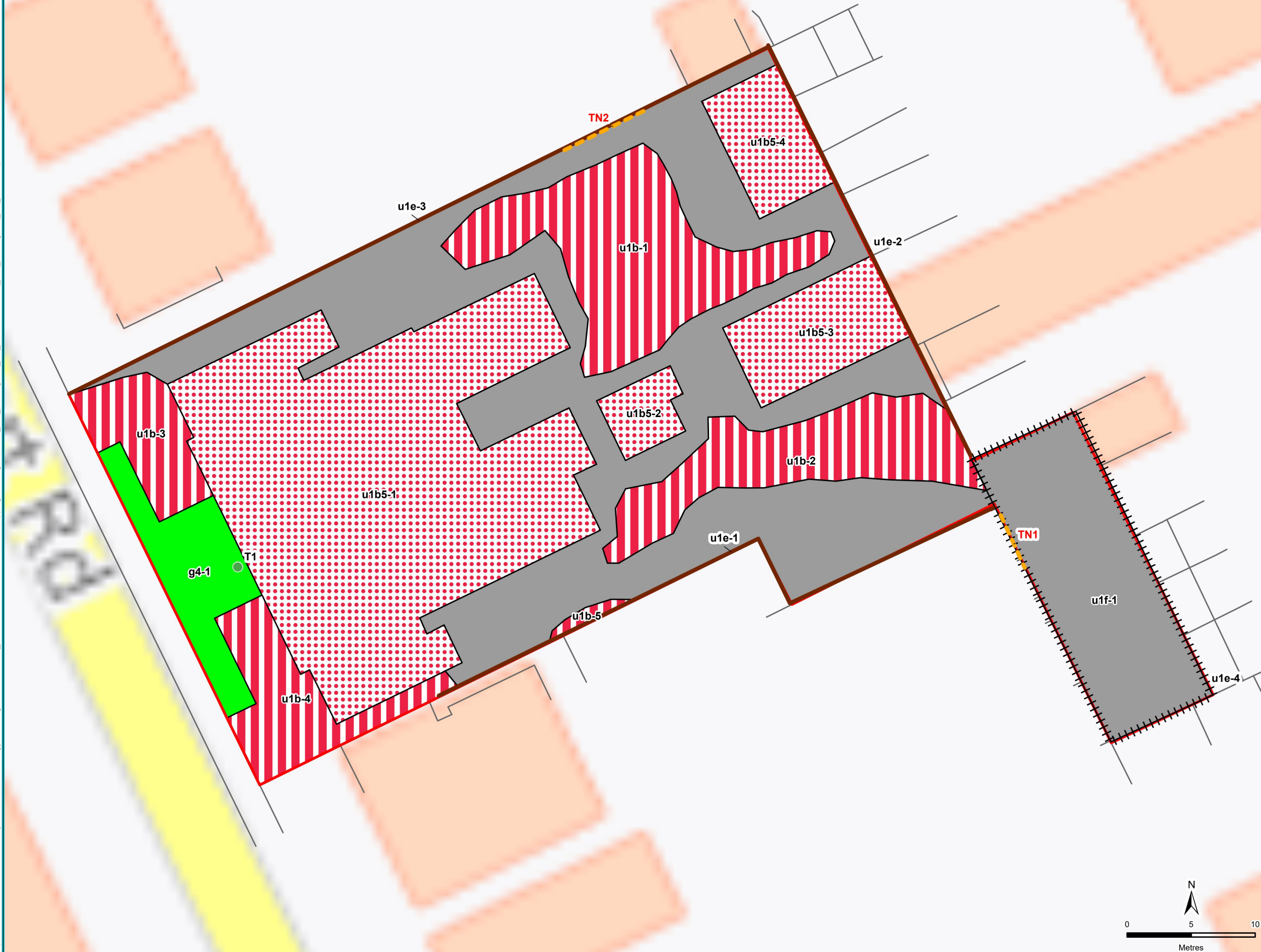
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Client
Mercury Land Holdings Ltd

Figure Number
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Figure Title
Extended UK Habitat
Classification Survey Results



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Legend

Bat Potential Roosting Feature

●

 Gap(s) behind gutter

▼

 Lifted/raised flashing

◆

 Broken ridge tile

◆

 Broken roof tile

◆

 Missing roof tile

●

 Open ventilation feature

 Gap(s) between soffit/fascia and wall

 Lifted/raised roof tile

 Missing mortar

 Missing ridge tile

 Missing roof tile

Overall Suitability (whole building) to Support Roosting Bats

■

 High

■

 Moderate

■

 Negligible

□

 Site Boundary

Map Centre Grid Reference: 551936E 188345N

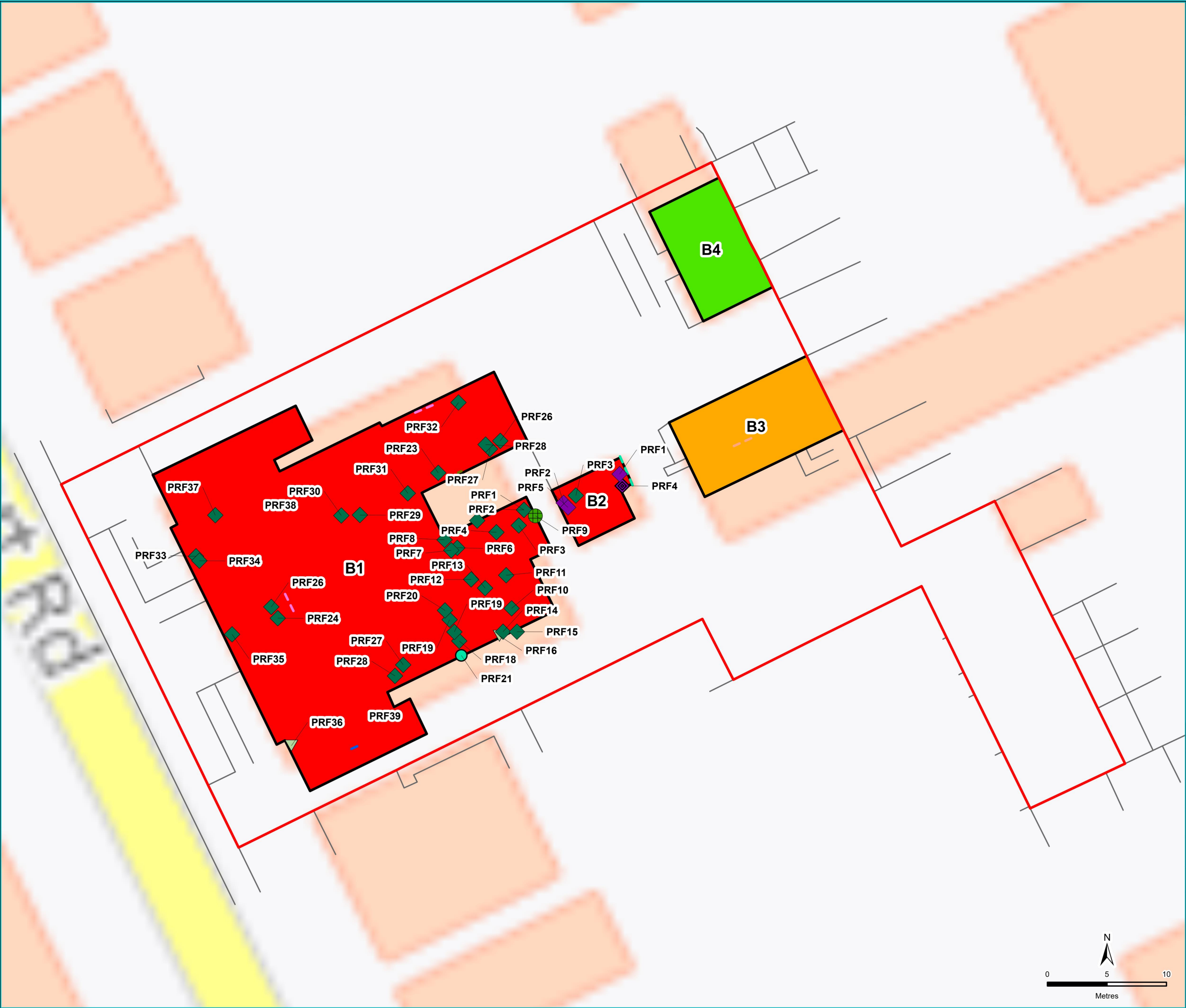
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Client		Mercury Land Holdings Ltd	
Figure Number		3	

Figure Title

PRA Survey Results





Photograph 1:
Grassland (g4-1) found at the street side of the site.



Photograph 2:
West (street side) of the main school building (B1).
T1 can be seen to the right.



Photograph 3:
Building 3 (B3) surrounded by scattered buddleia
scrub.



Photograph 4:
Building 2 (B2) to the left with scattered buddleia
scrub.



Photograph 5:
Back of Building 1 (B1) with an example of the com-
plex roof structure.



Photograph 6:
Building 4 (B4) showing a prefabricated cabin build-
ing.

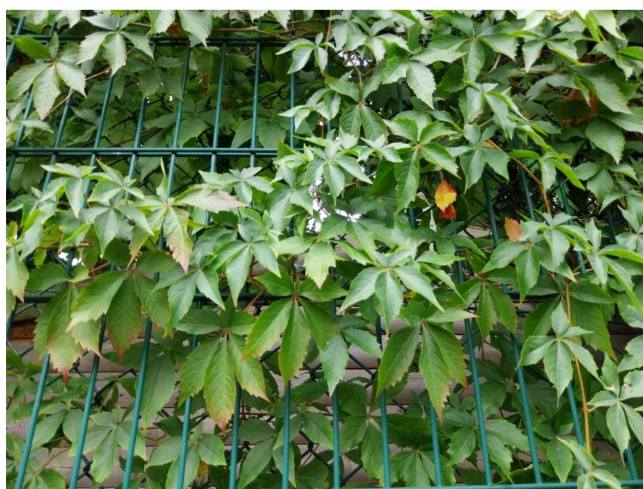
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Figure Number	4a	Drawn APB	Checked AS	
Figure Title	Photographs of the Site	Date 11/09/2024		



Photograph 7:
Sparsely vegetated urban land with scattered scrub (u1f).



Photograph 8:
Sports pitch surrounded by fencing located on the southeast corner of the site.



Photograph 9:
INNS Virginia creeper (TN1) located on site climbing over the boundary fencing.



Photograph 10:
INNS Virginia creeper (TN2) located on site climbing over the boundary wall.



Photograph 11:
Missing ridge tiles on B3.



Photograph 12:
Gap between bargeboard and wall on B2.

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Figure Number	4b	Drawn	APB	Checked	
Figure Title	Photographs of the Site			AS	
		Date	11/09/2024		



Photograph 13:
Example of PRFs found on B2.



Photograph 14:
Example of lifted flashing, missing tiles and dormer on B1.



Photograph 15:
Example of missing tiles and loft vents on B1.



Photograph 16:
Example of lifting tiles and boarded windows with gaps on B1.



Photograph 17:
Back of B1 showing missing tiles, dormers with gaps around them and lifting flashing.



Photograph 18:
Example of lifted tiles found on the front face of B1.

Client	Mercury Land Holdings Ltd		Drawing Ref		MER002-004/001/405999/1		Thomson environmental consultants www.thomsonec.com enquiries@thomsonec.com
Figure Number	4c		Drawn		Checked		
Figure Title	Photographs of the Site		APB		AS		
			Date		11/09/2024		

2. Introduction

2.1 Context

2.1.1 This report presents the findings of a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) undertaken as an initial step to identify potential ecological constraints relating to the project proposal for the construction of nine new residential dwellings at Youth Century House in Romford, Greater London.

2.1.2 During the ecological desk study, designated sites and priority habitats¹ for nature conservation are identified within a defined study area of the proposed works and the potential of the project to affect those sites and habitats is discussed. Records for protected species and species of conservation concern² are collated to identify potential effects of the project and inform requirements for further surveys if necessary. During the habitat survey undertaken by a suitably qualified ecologist, the habitats present on the site were identified and mapped to determine the baseline biodiversity metric value for the site and the suitability of the site to support protected species and species of conservation concern. During the Preliminary Roost Assessments, buildings and trees were assessed for the suitability to support roosting bats.

2.1.3 The report has been prepared by Thomson Environmental Consultants on behalf of Mercury Land Holdings Ltd.

2.2 Project Description

2.2.1 Mercury Land Holdings Ltd is preparing a planning proposal for the construction of nine new residential dwellings on a 0.24 ha site at the location of the Youth Century House, Albert Road, Romford, RM1 2PS (central grid reference TQ 51928 88346). The project will require the partial demolition of existing buildings and clearance of existing habitats, including the modified grassland and tree onsite.

2.2.2 The proposals are hereafter referred to collectively as 'the works'.

2.2.3 The project will require planning consent from the London Borough of Havering.

3. Ecology Background

3.1.1 A Preliminary Ecological Appraisal (PEA) of the site was completed in August 2022 (Wallace Darwin Environments, 2022a) with recommendations included for badgers, breeding birds, hedgehogs and invasive non-native species (INNS), and further surveys recommended for bats. A Biodiversity Net Gain (BNG) report (Wallace Darwin Environments, 2022b), was completed for the site in September 2022.

¹ Priority habitats are habitats listed on the Section 41 list of the Natural Environment and Rural Communities Act 2006 (the NERC Act) as Habitats of Principal Importance in England or listed in local Biodiversity Action Plans.

² Species of conservation concern are species identified on published lists as being rare, vulnerable or declining. This includes priority species which are species which are listed on the Section 41 list of the NERC Act as Species of Principal Importance in England or species which are listed in local biodiversity action plans. Protected species are species protected under legislation.

3.2 Site Description

- 3.2.1 The site is 0.24 ha and, at the time of survey, consisted of buildings, sparsely vegetated urban land, developed land sealed surfaces, modified grassland and a single urban tree. The site location is shown on Figure 1.
- 3.2.2 The area impacted by the works is hereafter referred to as 'the site'.

3.3 The Brief and Objectives

- 3.3.1 Thomson Environmental Consultants Ltd were commissioned by Mercury Land Holdings Ltd on 17th July 2024 to undertake a PEA for the project, including:
- an ecological desk study including identification of statutory and non-statutory designated sites within 2km of the study area and records of important species within 1km of the study area, using data purchased from the Local Biological Record Centre;
 - a habitat survey of the site by a suitably trained ecologist using the UK Habitat Classification methodology. The survey will be "Extended" to include consideration of the potential for habitats on site to support important species;
 - a condition assessment of each on-site habitat parcel in order to collect data to inform baseline biodiversity net gain calculations;
 - a Ground Level Tree Assessment (GLTA);
 - a Preliminary Roost Assessment (PRA) to include, where possible, an external and internal inspection of the building. and
 - a combined report supported by appropriate digitised mapping that details the methods and results of the desk study, GLTA, PRA and habitat survey. The report will include consideration of any relevant legislation and planning policies, with recommendations for necessary compliance measures and for any further surveys that are required.
- 3.3.2 The objective of the appraisal was to identify constraints and opportunities related to ecology and biodiversity with respect to the proposed development of the site as detailed in the project description.

3.4 Limitations

- 3.4.1 None of the buildings were entered due to the presence of asbestos and the derelict state of some of the buildings, therefore only an external assessment was carried out.
- 3.4.2 The roof of Building 1 was not fully observed as it presented a complex structure including multiple ridges, dormers, cross gables, all at different levels, that limited the view from the ground. The use of thermal camera Night Vision Aids (NVAs) during the bat dusk surveys are recommended to overcome this limitation.
- 3.4.3 The species data collated during the desk study is mainly derived from records submitted by members of the public and *ad hoc* surveys undertaken by volunteers. Therefore, it should not be

taken as a definitive list of the protected species and other species of conservation concern that occur in the local area.

- 3.4.4 This report is based on the development boundary and layout shown on Proposed Ground Floor Plan (ref. 673-CDA-ZZ-00-DR-A-05-0100-REV 16) as shown at Appendix 3. Subsequent changes may result in a requirement to reassess the potential impacts of the development and the requirements for avoidance, mitigation and enhancement.

4. Planning Policy and Legislation

4.1.1 National legislation and planning policy, and local policies, relating to ecology and biodiversity relevant to the proposed works, are summarised below.

4.1.2 This report refers to 'ecological features' which include:

- statutory designated sites for nature conservation;
- non-statutory designated sites for nature conservation;
- priority habitats for nature conservation, including ancient woodland;
- protected species;
- species of conservation concern; and
- invasive non-native species.

Designated Sites

4.1.3 Designated sites for nature conservation are protected under UK legislation. Sites can be classified according to their levels of conservation importance. Sites may be considered of international, national or local conservation importance. Internationally important sites receive the highest level of protection.

4.1.4 Statutory designated sites of international importance include **Special Areas of Conservation (SACs)**, **Special Protection Areas (SPAs)** and **Ramsar sites**³.

4.1.5 **SACs** are protected areas in the UK designated under the **Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations)** in England and Wales (including the adjacent territorial sea) and to a limited extent in Scotland (reserved matters) and Northern Ireland (excepted matters).

4.1.6 **SPAs** are protected areas for birds in the UK classified under the **Habitats Regulations** in England, Scotland and Wales.

4.1.7 Paragraph 187 of the **NPPF** states that '*The following should be given the same protection as habitats sites*⁴:

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

³ SACs and SPAs were formally known as European sites forming part of the Natura 2000 site network. Following the UK's exit from the EU they are now referred to as National Sites and are part of the National Site Network. However, these sites can still be considered to be of international importance for nature conservation. Developments affecting these sites must be considered according to the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended).

⁴ Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 (as amended) for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

- 4.1.8 Statutory designated sites of national importance include **Sites of Special Scientific Interest (SSSIs)** which are protected under the **Wildlife and Countryside Act 1981 (as amended) (WCA)**, **Countryside and Rights of Way Act 2000 (CRoW Act)** and **Natural Environment and Rural Communities Act 2006 (NERC Act)**. **National Nature Reserves (NNRs)** are a selection of the very best parts of England's SSSIs, protected under the **WCA** and **CRoW Act**.
- 4.1.9 SSSIs are protected by law and planning guidance. Local Planning Authorities in England must consult Natural England on planning applications that might affect SSSIs. Operations that could damage special interests require consent by Natural England. Under the WCA it is an offence to damage, disturb or destroy land within a SSSI or disturb wildlife in a SSSI.
- 4.1.10 Paragraph 186(b) of the NPPF states that '*When determining planning applications, local planning authorities should apply the following principles: (b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.*'
- 4.1.11 Natural England's Impact Risk Zones (IRZs) for SSSIs (Natural England, 2024) is a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and "Compensation Sites", which have been secured as compensation for impacts on National Sites. Development proposals situated within IRZs may require consultation between the Local Planning Authority and Natural England to discuss the potential impacts of a proposal upon the designated site.
- 4.1.12 **National Parks, the Broads and Areas of Outstanding Natural Beauty** are also of national importance. Paragraph 181 of the NPPF states that: '*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.*'
- 4.1.13 **Local Nature Reserves (LNRs)** are statutory designated sites of local importance that receive protection under the **National Parks and Access to the Countryside Act 1949**. Local Planning Authorities are required to consult Natural England about all new proposals. An LNR can be given protection against damaging operations. It also has protection against development on and around it. This protection is usually given via the Local Plan⁵, produced by the Local

⁵ A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Planning Authority, and often supplemented by local by-laws. Unlike national designations, the level and type of protection afforded an LNR is decided locally and varies from site to site.

- 4.1.14** Non-statutory designated sites, such as **Sites of Nature Conservation Interest (SNCI)**, **Sites of Interest to Nature Conservation (SINC)** and **Local Wildlife Sites (LWSs)** are of local importance. These sites are not protected under legislation. However, local authorities take account of local sites when formulating local plans and when considering planning applications.
- 4.1.15** The importance of sites of biodiversity value, considered to be synonymous to ‘designated sites’ is also recognised in Paragraph 180 of the **National Planning Policy Framework (NPPF)** (Department for Levelling Up, Housing & Communities, 2023) which states that ‘*Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).*’
- 4.1.16** Policy 30 of London Borough of Havering Local Plan (Havering London Borough 2021) states that the Council will protect and enhance the borough’s natural environment and seek to increase the quantity and quality of biodiversity in Havering by:
- *“Ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. Appropriate mitigation and compensation measures will also need to be identified where necessary. If significant harm 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 will normally be refused.*
 - *Not permitting development which would adversely affect the integrity of Specific Scientific Interest, Local Nature Reserves and Sites of Importance for Nature Conservation except for reasons of overriding public interest, or where adequate compensatory measures are provided;”*

Priority Habitats

- 4.1.17** In this report priority habitats for nature conservation include:
- Habitats of Principal Importance listed under Section 41 of the NERC Act;
 - habitats listed under Local Biodiversity Action Plans (LBAPs); and
 - ancient woodland.
- 4.1.18** **Habitats of Principal Importance** are listed under the NERC Act. Under Section 41, the Secretary of State must publish a list of the types of habitat which in their opinion are of principal importance for the purpose of conserving biodiversity.
- 4.1.19** Section 40 of the Act places a duty on all public bodies, including planning authorities, to have regard for biodiversity in exercising their functions. Planning authorities should have particular regard to the Habitats of Principal Importance (henceforth referred to as **priority habitats**) listed under Section 41 of the Act which should be treated as a material consideration in the planning process.

- 4.1.20** Paragraph 185 of the NPPF states that to protect and enhance biodiversity and geodiversity, plans should ‘*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*’ The NPPF defines ‘priority habitats and species’ as ‘*Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006*’.
- 4.1.21** Some habitats are described as ‘**irreplaceable habitat**’. The NPPF describes these as habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include **ancient woodland**, **ancient and veteran trees**⁶, **blanket bog**, **limestone pavement**, **sand dunes**, **salt marsh** and **lowland fen**.
- 4.1.22** **Ancient woodland** is any area that has been wooded continuously since at least 1600AD⁷. Paragraph 186(c) of the NPPF states that ‘*When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists...*’
- 4.1.23** Policy 30 of the London Borough of Havering Local Plan (Havering London Borough 2021), as highlighted in Paragraph 3.1.16 also refers to protected habitats and species.

Protected Species

- 4.1.24** Rare and declining plant and animal species in the UK are generally protected under national legislation.
- 4.1.25** Species protected under the Habitats Regulations⁸ receive the highest level of protection in the UK. These species can be considered to be of international importance because they are rare or declining in Europe as well as in the UK. These species are not only protected from killing and injury, but their breeding sites and resting places are also protected. These species include:
- **great crested newt** (*Triturus cristatus*), **natterjack toad** (*Epidalea calamita*) and **pool frog** (*Pelophylax lessonae*);
 - **sand lizard** (*Lacerta agilis*) and **smooth snake** (*Coronella austriaca*);
 - **all bat species**;
 - **hazel dormouse** (*Muscardinus avellanarius*) and **otter** (*Lutra lutra*);
 - **large blue butterfly** (eggs, caterpillars, chrysalises and adults);
 - **Fisher’s estuarine moth** (eggs, caterpillars, chrysalises and adults); and
 - **little ramshorn whirlpool snail**.
- 4.1.26** For the species listed above, the Habitats Regulations make it an offence to:

⁶ <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

⁷ Ancient woodland includes ‘ancient semi-natural woodland’ (ASNW) and ‘plantations on ancient woodland sites’ (PAWS).

⁸ These species are often referred to as European Protected Species (EPS) because the requirement to protect them under national legislation originally derived from the fact that these species are listed under the European Habitats Directive.

- deliberately kill, injure, disturb or capture them;
- deliberately take or destroy their eggs;
- damage or destroy their breeding sites and resting places⁹; and
- possess, control or transport them (alive or dead).

4.1.27 The WCA also offers protections. In addition to the species listed above, which also receive some protection under the WCA (Section 9 (1)), protection under this legislation is given to prevent intentional (or reckless in Scotland) killing and injury¹⁰ of:

- **common lizard** (*Zootoca vivipara*), **slow worm** (*Anguis fragilis*), **adder** (*Vipera berus*) and **grass snake** (*Natrix helvetica*);
- all wild **birds**; and
- **water vole** (*Arvicola amphibius*).

4.1.28 The WCA also provides additional protection for some species also protected under the Habitats Regulations. These species include **GCN**, **sand lizard**, **smooth snake**, **bats**, **dormouse**, **otter**, **large blue butterfly**, **Fisher's estuarine moth** and **little ramshorn whirlpool snail** whereby it is also an offence under the WCA to intentionally or recklessly:

- disturb while they occupy a structure or place used for shelter or protection; and
- obstruct access to a place of shelter or protection.

4.1.29 In the case of **birds**, as well as birds being protected from killing or injury, it is also an offence to take, damage or destroy a nest that is in use or being built, and to take or destroy eggs. Additional protection applies to specific birds listed in Schedule 1 of the WCA, meaning it is also an offence to intentionally or recklessly disturb these species when: on, or near a nest containing eggs or young; when it's building a nest; or when the nest is active with dependent young.

4.1.30 **Water vole**, **freshwater pearl mussel** and **invertebrate species** are also protected under Schedule 5 of the WCA, making it an offence to intentionally: kill, injure or take them; and possess or control them (alive or dead). It is also an offence to intentionally or recklessly: damage or destroy a structure or place used for shelter or protection; disturb them in a place used for shelter or protection; or obstruct access to a place used for shelter or protection.

4.1.31 **White-clawed crayfish** are partly protected under the WCA, which makes it an offence to capture this species without a licence and also prohibits trade in this species.

4.1.32 **Freshwater and migratory fish** and their habitats receive protection under the WCA and under the **Salmon and Freshwater Fisheries Act 1975** and **Eels (England and Wales) Regulations 2009**. These species include **Atlantic salmon** (*Salmo salar*), **bullhead** (*Cottus gobio*), **lamprey** (brook, river and sea) (*Petromyzontiformes*), **spined loach** (*Cobitis taenia*) and **European eel** (*Anguilla anguilla*).

4.1.33 **Badger** (*Meles meles*) receive protection under the **Protection of Badgers Act 1992**. Whereby it would be an offence to: take, injure or kill a badger - or attempt these actions; treat a badger cruelly; interfere with a badger sett; possess or control a live badger; or mark or ring a badger.

⁹ This applies even if the species is not present at the time when the damage or destruction occurs.

¹⁰ The WCA also protects many species from activities related to their sale, including: selling, offering for sale, possessing or transporting for the purpose of the sale or publishing advertisements to buy or sell a protected species (WCA Section 9 (5)).

- 4.1.34 **Other mammal species** including **rabbit** (*Oryctolagus cuniculus*), **fox** (*Vulpes vulpes*) and **hedgehog** (*Erinaceus europaeus*) are protected under the **Wild Mammals (Protection) Act 1996**, which makes it an offence to inflict any unnecessary suffering, including crushing or asphyxiation of a wild mammal.
- 4.1.35 Under the WCA, it is an offence to intentionally uproot any **wild plant** without the landowner's consent. For the majority of plants, fungi and lichen listed on Schedule 8 of the WCA it is an offence to intentionally pick, uproot or destroy them, unless it could not be reasonably avoided (i.e. it was an incidental result of a lawful action).
- 4.1.36 Some plants are listed on Schedule 5 of the Habitats Regulations. For these species it is an offence to: deliberately pick, collect, cut, uproot or destroy them; or possess, control or transport them (alive or dead).
- 4.1.37 Policy 30 of the London Borough of Havering Local Plan (Havering London Borough 2021), as highlighted in Paragraph 3.1.16 also refers to protected habitats and species.
- 4.1.38 Paragraph 12.2.9 of London Borough of Havering Local Plan states "*Development must demonstrate that the impact of proposals on protected sites and species has been fully assessed when development has the potential to impact on such sites or species. Appropriate mitigation and/or compensation measures will also need to be identified where necessary. The Council will offer early advice and will require protected species surveys to be carried out where occurrence of protected species is either confirmed or likely, including derelict or vacant land and buildings*".

Species of Conservation Concern

- 4.1.39 Other rare or declining species may not receive strict legal protection but may be recognised on published lists as species of conservation concern that should be protected as a matter of best practice.
- 4.1.40 Under Section 41 of the NERC Act, the Secretary of State must publish a list of the living organisms which in the Secretary of State's opinion are **Species of Principal Importance** for the purpose of conserving biodiversity. Planning authorities are required to have particular regard to these species and treat them as a material consideration in the planning process. Consideration of species of conservation concern during development projects is a requirement of the NERC Act which states that any '*public authority must, in exercising its functions, have regard... to the purpose of conserving biodiversity*' and '*conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat*'.
- 4.1.41 Species of Principal Importance or species listed on Local Biodiversity Action Plans (LBAPs) are henceforth referred to as '**priority species**'.
- 4.1.42 Most protected species are also listed as Species of Principal Importance, including:
- **species of amphibian** not protected from killing and injury under the WCA but listed as species of principal importance including **common toad** (*Bufo bufo*);
 - all native **reptile** species in England;
 - **otter, water vole, hazel dormouse** and several species of **bat**;
 - many **invertebrates**, including **white-clawed crayfish**; and

- many species of **fish, bird, plant, fungi and lichen**.

4.1.43 Amber/red list species are also considered as species of conservation concern, most notably:

- Rare or declining **bird** species listed as red or amber in **Birds of Conservation Concern (BOCC)** (Stanbury *et al.*, 2021); and
- Rare or declining **plant** species listed as Near Threatened (NT), Vulnerable (VU), Endangered (EN) or Critically Endangered (CE) under **A Vascular Plant Red List for England** (Stroh *et al.*, 2014).

4.1.44 Paragraph 12.2.10 of London Borough of Havering Local Plan (Havering London Borough 2021) states “*In addition to legally protected species such as bats, great crested newts, badgers, reptiles and water voles, Havering has important populations of other species listed in National, London or Havering Biodiversity Action Plans (BAP). Development is expected to identify appropriate measures to extend favourable conditions for protected species on land and in buildings, e.g. through landscaping or by providing bird or bat boxes.*”

Invasive Non-Native Plant Species

4.1.45 **Invasive non-native plants** are those listed as species of special concern because they have the potential to cause severe problems for native UK plants and the environment.

4.1.46 The relevant legislation on invasive plant species is:

- Schedule 9 of the WCA; and
- Schedule 2 of the Invasive Alien Species (Enforcement and Permitting) Order 2019, which gives effect to EU regulations on the prevention and management of the spread of invasive alien species.

4.1.47 Both make it an offence to ‘*plant or otherwise cause to grow in the wild*’ any plant species listed.

Biodiversity Net Gain

4.1.48 The NERC Act states that any ‘*public authority must, in exercising its functions, have regard... to the purpose of conserving biodiversity*’ and ‘*conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.*’

4.1.49 Paragraph 180 of the NPPF states that ‘*Planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*’.

4.1.50 Paragraph 186 of the NPPF states that: ‘*When determining planning applications, local planning authorities should apply the following principles:*

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should

be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate'.

- 4.1.1** The **Environment Act 2021** provides a framework to improve and protect the natural environment and is overseen by the Office for Environmental Protection. One of the provisions of the Act is the mandatory requirement for most new developments to provide a 10% net gain in biodiversity. Both onsite and offsite enhancements will need to be maintained for a period of at least 30 years following completion of a development.
- 4.1.2** Paragraph 11.2.7 of London Borough of Havering Local Plan (Havering London Borough 2021) states "*landscaping schemes should demonstrate a commitment to promoting biodiversity, having regard to Havering's Nature Conservation and Biodiversity Strategy (2014). Wherever possible, the opportunity to create new areas of wildlife habitat should be taken. Biodiversity can be incorporated into development through wildlife-friendly landscapes, careful choice of plant and tree species, installation of Sustainable Drainage Systems (SuDS), and features such as green walls, balconies and roofs, and nesting and roosting spaces. Such measures also contribute to the protection and promotion of habitat links with adjacent areas to extend wildlife corridors as defined in Policy 30.*"

5. Desk Study

5.1 Methods

5.1.1 A study area was defined to cover the site and all land within a 2 km buffer area. Records for designated sites, ancient woodland and priority habitats were sought for the full 2 km study area. Records for protected species, species of conservation concern and invasive non-native species (INNS) were sought for a 1 km buffer area. An additional study area with a 250 m buffer area was used for the identification of waterbodies. The site location and study areas are shown on Figure 1.

5.1.2 These search areas for biological records were deemed to be suitable based on the zone of influence for the works. The zone of influence for a project is defined as the area over which ecological features may be subject to significant effects as a result of the proposed project and associated activities (CIEEM, 2017).

5.1.3 Sources of information were as follows:

Table 5.1: Sources of desk study data

Source	Summary of information provided
Greenspace Information for Greater London (GiGL)	Non-statutory designated sites and species records. Requests for information were sent on 23 rd July 2024. Results were received on 24 th July 2024.
The Multi-Agency Geographical Information for the Countryside (MAGIC)	Locations of waterbodies, statutory designated sites, protected species licence returns and priority habitats (including ancient woodland).
Ordnance Survey (OS) mapping	The presence of running (rivers and streams) and standing (lakes, ponds and ditches) waterbodies.

5.1.4 Results were filtered to include only those relevant to the study area and only those recorded in the last ten years. Results are presented in the following section.

5.1.5 Potential ecological constraints identified as a result of the desk study are presented in Section 8.

5.2 Results

5.2.1 The results of the desk study are summarised below and shown on Figure 1.

Designated Sites

5.2.2 There are two statutory designated sites within the study area. The closest of which is The Chase Local Nature Reserve (LNR). Details of statutory designated sites are given in Table 5.2.

5.2.3 There are 10 non-statutory designated sites within the study area. The closest of which is Romford to Harold Wood Railsides Site of Importance for Nature Conservation (SINC) of Borough II grade. Details of non-statutory designated sites are given in Table 5.2.

Table 5.2: Designated sites within the study area

Site Name	Designation	Central Grid Reference	Description	Distance (km) and Orientation to Site
County and Local Sites (SINCs, LNRs, etc)				
The Chase	LNR	TQ 515 860	Offers a diverse mix of habitats. Shallow wetlands, woodland, grassland and the River Rom support an abundance of wildlife. Rare visitors during the migration periods such as pine bunting (<i>Emberiza leucocephalos</i>), great snipe (<i>Gallinago media</i>) and spotted crake (<i>Porzana porzana</i>). Other animals include water voles, great crested newts, slow worms and badgers.	1.569 km S
East Brookend Country Park	LNR	TQ 510 858	Large scale earth moving to develop an interesting, undulating landscape on what was formerly land filled derelict land. The landfill was capped with a layer of impermeable clay and topsoil; large scale seeding was undertaken using wildflower grassland mixes that are particularly suited to poor soils and more than 50,000 small trees (whips) were planted across the site.	1.885 km SW
The Chase and East-Brookend Country Park	SINC Metropolitan	TQ 512 863	This extensive area of grassland and former gravel works contains a variety of aquatic plants and attracts numerous waterfowl and wading birds.	0.927 km S
Romford Golf Course	SINC Borough I	TQ 524 903	A large golf course with some excellent flower-rich grassland at its northern edge, as well as woodland, hedges and ponds.	1.161 km N
Romford to Harold Wood Railsides	SINC Borough II	TQ 531 894	Havering's railsides form a network of valuable undisturbed habitats, acting as corridors for wildlife moving around the borough.	0.418 km N

Romford to Upminster Railsides	SINC Borough II	TQ 537 879	Havering's railsides form a network of valuable undisturbed habitats, acting as corridors for wildlife moving around the borough.	0.503 km NW
Railsides west of Romford	SINC Borough II	TQ 508 882	Havering's railsides form a network of valuable undisturbed habitats, acting as corridors for wildlife moving around the borough.	0.640 km W
Raphael Park	SINC Local	TQ 518 899	An attractive park with a good range of wildlife habitats, including meadow, young woodland and a lake.	1.109 km N
Harrow Lodge Park	SINC Local	TQ 530 866	An attractive large park with a good range of wildlife habitats, including lake, streams, woodland and scrub.	1.181 km S
Romford Cemetery	SINC Local	TQ 505 876	A large cemetery with flowery grassland, scrub and some old trees.	1.184 km W
Langtons Gardens	SINC Local	TQ 537 874	A small park with a lake and an area of woodland.	1.179 km NE
River Rom at King George's Playing Fields	SINC Local	TQ 501 897	A fast-flowing stream with a good range of aquatic plants	1.92 km NW

Ancient Woodland

- 5.2.4 No parcels of ancient woodland were recorded within the study area.

Other Priority Habitats

- 5.2.5 Two types of priority habitat were identified within the study area. The habitats are summarised in Table 5.3 and the locations are shown on Figure 1.

Table 5.3: Priority habitats within the study area

Priority Habitat Type	Grid Reference of Nearest Parcel	Distance to Site of Nearest Parcel (km)	Number of parcels within 2km
Open mosaic habitat	TM 00496 24932	1.09 km	4
Deciduous woodland	TQ 5138 8698	1.43 km	28

Waterbodies

- 5.2.6 No waterbodies were recorded within the study area.

Protected Species and Species of Conservation Concern

- 5.2.7 Records of several protected species and species of conservation concern were identified within the study area. Details of the species are given in Table 5.5.

Invasive Non-Native Species

- 5.2.8 There are no records for invasive non-native species recorded within the study area. Two additional records for species included in the London Invasive Species Initiative (LISI) (<https://www.gigl.org.uk/our-data-holdings/species-data/london-invasive-species/>) were returned within the study area. These records are summarised in Table 5.4.

Table 5.4: Invasive non-native species

Common name	Scientific name	LISI Category	Distance of closest record (km) and accuracy
Buddleia	<i>Buddleja davidii</i>	LISI category 3	0.907 (1m)
Snowberry	<i>Symphoricarpos albus</i>	LISI category 2	1 (1m)

Table 5.5: Species records derived from the desk study

Common Name	Scientific Name	CHSR ¹¹ Schedule 2 or 5	WCA ¹² Schedule 1, 5 or 8	National Priority Species ¹³	Local Priority ¹⁴	Red Data Book/ BoCC ¹⁵	No. of Records	Year of Most Recent Record	Distance from Site of Closest Record (km) and Orientation
Amphibians									
Common frog	<i>Rana temporaria</i>		Schedule 5 (sale only)		LPS		18	2017	0.893 S
Common toad	<i>Bufo bufo</i>		Schedule 5 (sale only)	✓	LPS		12	2016	0.893 S
Birds									
Fieldfare	<i>Turdus pilaris</i>		Schedule 1			Red	10	2019	0.816 E
Grey wagtail	<i>Motacilla cinerea</i>				LSOCC	Amber	84	2019	0.522 W
House sparrow	<i>Passer domesticus</i>			✓	LPS LSOCC	Red	143	2019	0.327 NE
Kingfisher	<i>Alcedo atthis</i>		Schedule 1		LPS		23	2019	0.622 W
Starling	<i>Sturnus vulgaris</i>			✓	LPS LSOCC	Red	8	2019	0.726 E
Swift	<i>Apus apus</i>				LPS	Red	77	2021	0.766 SW
Invertebrates									
Small Copper	<i>Lycaena phlaeas</i>				LSP		11	2021	0.958 SW

¹¹ Conservation of Habitats and Species Regulations 2017, as amended

¹² Wildlife and Countryside Act 1981, as amended

¹³ Species of Principal Importance within the relevant country of the United Kingdom

¹⁴ London Priority Species (LPS) and Species of Conservation Concern in London (LSOCC) <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/environment-publications/london-priority-species>

¹⁵ Birds of Conservation Concern 5: the status of all regularly occurring birds in the United Kingdom, Channel Islands and the Isle of Man (Stanbury *et al.*, 2021)

Common Name	Scientific Name	CHSR ¹¹ Schedule 2 or 5	WCA ¹² Schedule 1, 5 or 8	National Priority Species ¹³	Local Priority ¹⁴	Red Data Book/ BoCC ¹⁵	No. of Records	Year of Most Recent Record	Distance from Site of Closest Record (km) and Orientation
Small heath	<i>Coenonympha pamphilus</i>			✓	LPS LSOCC		8	2019	1.0 E
Small skipper	<i>Thymelicus sylvestris</i>				LSP		17	2020	1.0 SW
Stag beetle	<i>Lucanus cervus</i>		Schedule 5 (sale only)	✓	LSP		669	2022	0.105 NE
Mammals									
Bats	<i>Chiroptera</i>	Schedule 2	Schedule 5	✓	LSOCC		15	2018	0.479 SW
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	Schedule 2	Schedule 5		LSOCC		16	2021	0.632 W
Western Hedgehog	<i>Erinaceus europaeus</i>			✓	LPS LSOCC		143	2022	0.266 NE
Reptiles									
Common Lizard	<i>Zootoca vivipara</i>		Schedule 5	✓	LPS LSOCC		1	2022	1.0 S
Grass Snake	<i>Natrix helvetica</i>		Schedule 5	✓	LPS LSOCC		4	2020	0.768 E

6. Habitat Survey

6.1 Methods

- 6.1.1** A survey area was defined as an area that encompassed the site boundary. The survey area is shown on Figure 2.
- 6.1.2** A survey using the UK Habitat Classification system (UKHab Ltd, 2023) was conducted throughout the survey area. This is a nationally recognised habitat classification system that is compatible with the Defra statutory metric for calculating biodiversity net gain values (Defra, 2023a).
- 6.1.3** The UKHab has five hierarchical levels and includes the identification of priority habitats and Annex I habitats as listed under the European Habitats Directive. The five levels are:
- Level 1 - Biomes/major ecosystems (terrestrial, freshwater and coastal);
 - Level 2 - Ecosystem types (i.e. woodland, grassland, heathland and scrub);
 - Level 3 - Broad Habitats, based on those of the UK Biodiversity Action Plan (UKBAP);
 - Level 4 - Habitats, including priority habitats; and
 - Level 5 - Habitats, including Annex I habitats.
- 6.1.4** In addition, non-hierarchical secondary codes were used to provide supplementary information.
- 6.1.5** During the field survey, the habitats in the survey area were mapped to the highest level possible
- 6.1.6** Table 6.1 below shows the meta-data used for this survey.

Table 6.1: Habitat survey meta-data

Scope and purpose of the survey	Preliminary Ecological Appraisal (PEA)
Area surveyed	See figure 2
Edition of UKHab used	UKHab - Professional (V2)
Minimum Mapping Unit (MMU)	25m ² for areas, 5m for linear features
Level of UKHab Primary Hierarchy used	Level 5, where possible
List of Secondary Code groups recorded	All secondary codes
Additional attributes recorded	Habitat condition assessment
Map projection and units	See Figure 2
Date of survey	6 th August 2024

Organisation and individual undertaking the survey	Ana Pino-Blanco, BSc (Hons) MSc, Qualifying member of CIEEM, Ecological Consultant. Thomson Environmental Consultants
References for any existing datasets that have been used	MAGIC GiGL

6.1.7 The dominant and readily identified species of higher plant species from each habitat type within the survey area were recorded and their abundance was assessed on the DAFOR scale:

- D Dominant;
- A Abundant;
- F Frequent;
- O Occasional; and
- R Rare.

6.1.8 These scores represent the abundance within the defined area only and do not reflect national or regional abundances. Plant species nomenclature follows Stace (2019).

6.1.9 Target notes were made for any features which were too small to map but were of particular ecological interest.

6.1.10 Incidental records of fauna were also made during the survey and the habitats identified were evaluated for their potential to support protected species and other species of conservation concern, including priority species. However, no specific faunal surveys were undertaken.

6.2 Results

Habitats and Flora

6.2.1 The habitats recorded on site are described below, with secondary codes given in brackets, and their distribution is given on Figure 2. A detailed list of habitats is included in Appendix 1 with the habitat condition assessment tables included in Appendix 2.

g4 (203, 813) - Modified grassland (mature tree, educational premises open space)

6.2.2 An area of modified grassland (g4-1 on Figure 2 and Photograph 1 on Figure 4a), approximately 0.01ha, is located at the front of the main building on site (u1b5-1), which faces the street. The grassland comprises of abundant perennial rye-grass (*Lolium perenne*), frequent false oat grass (*Arrhenatherum elatius*), occasional wall barley (*Hordeum murinum*), cock's-foot (*Dactylis glomerata*), and Yorkshire fog (*Holcus lanatus*). Forb species included abundant creeping cinquefoil (*Potentilla reptans*), frequent dandelion (*Taraxacum officinale* agg.) and mallow (*Malva sylvestris*), and occasional dock (*Rumex* sp.). A single mature urban tree, a holly (*Ilex aquifolium*) (T1) (Photograph 2 on Figure 4a) is located within the grassland.

6.2.3 The condition of the grassland is Poor, only passing the criteria for having less than 20% scrub present, less than 10% of bare ground cover and less than 20% cover by bracken.

6.2.4 The condition of the urban tree is Moderate, passing three of the six criteria: the tree is a native species, the canopy is continuous, and the tree is mature.

u1b5 (518, 813) - Buildings (neglected, educational building)

6.2.5 An area of approximately 0.086 ha is occupied by a large educational building (u1b5-1 on Figure 2), and three smaller buildings (u1b5-2-4 on Figure 2). Photographs of these buildings (B1-B4) are shown on Figure 4a (Photographs 2-6).

6.2.6 Under the Statutory Biodiversity Metric, condition assessments are not required for this habitat type.

u1b6 (82, 518, 814) - Other developed land (vacant or derelict land, neglected, educational premises open space)

6.2.7 An area of approximately 0.05ha of the site is occupied by other developed land. These areas remain as tarmac sealed surfaces without vegetation.

6.2.8 Under the Statutory Biodiversity Metric, condition assessments are not required for this habitat type.

u1f (10, 82, 524, 813) - Sparsely vegetated urban land (scattered scrub, vacant or derelict land, invasive non-native species, educational premises open space)

6.2.9 Approximately 0.09ha of the site is occupied by areas of degraded hard standing (u1f on Figure 2 and Photographs 7 and 8 on Figure 4b) with scattered scrub dominated by buddleia (*Buddleja davidii*), a category 3 INNS as included in the LISI, and rare bramble (*Rubus fruticosus*), frequent willowherb (*Epilobium sp.*), occasional sycamore (*Acer pseudoplatanus*) seedlings, bristly ox-tongue (*Helminthotheca echioides*), wall barley, perennial rye-grass, rare ragwort (*Senecio sp.*), herb-robert (*Geranium robertianum*), green alkanet (*Pentaglottis sempervirens*), horseweed (*Erigeron sp.*) and a walnut seedling (*Juglans sp.*).

6.2.10 The condition of the habitat is Poor, only passing the criteria for containing different plants beneficial for wildlife.

u1e (518, 524, 612, 853) - Built linear features (neglected, fence, invasive non-native species, mortared wall)

6.2.11 The site is enclosed by approximately 0.148 km of mortared walls and a section of metallic fencing approximately 0.067 km (u1e on Figure 2), surrounding a sports pitch to the east. As the site has been left unmanaged for some time, the walls and fences are now covered by locally dominant different climbing plants including the INNS Schedule 9 plant; Virginia-creeper (*Parthenocissus quinquefolia*) (see TN1 and TN2 for location on Figure 2 and Photograph 9-10 on Figure 4b), common ivy (*Hedera helix*), honeysuckle (*Lonicera sp.*) and large bindweed (*Calystegia silvatica*).

6.2.12 Under the Statutory Biodiversity Metric, condition assessments are not required for this habitat type.

Fauna

6.2.13 No incidental records of fauna were recorded on site during the visit.

6.3 Potential of the Site to Support any Protected Species or Species of Conservation Concern

6.3.1 The building onsite has the potential to support nesting birds. The suitability for the site to support bats will be discussed in the following PRA results section.

7. Preliminary Roost Assessment

7.1 Methods

7.1.1 A survey area was defined as that within the red line boundary, all buildings and trees were assessed.

7.1.2 The survey area is shown on Figure 2 and includes the partial demolition of the existing buildings and the construction of nine new dwellings with access, parking and private gardens. As such, a PRA was undertaken to characterise these, which included a search for potential roosting features for bats (PRFs) and other evidence of bat presence. The PRA was carried out in accordance with current Bat Conservation Trust (BCT) Guidelines (Collins, Ed., 2023) by Ana Pino-Blanco who is BCT level 5/S and holds a Natural England licence to survey for bats (CL19 and CL20).

7.1.3 Evidence of roosting bats searched for included:

- Bat droppings, feeding remains and corpses (with notes made on quantity, freshness and type);
- Dark staining below an access point that may be caused by bat faeces or urine;
- Staining around a hole that may be caused by the natural oils in bat fur;
- Noises made by bats; and
- Presence of individual bats.

7.1.4 Any evidence of bats found was recorded together with a note on the location. If any bat droppings were found, their location, spread, approximate number and age were recorded on a GPS enabled mobile mapper or paper form. If necessary for identification, a sample of droppings was collected and retained for later DNA analysis.

External Inspection of Buildings

7.1.5 Where possible to determine, the following information was recorded for each building present within the survey area:

- Type (House, flats, offices, barn, church, etc.);
- Presence of roof void;
- Year built (1960 - present, 1914 - 1960, before-1914 or unknown);
- Aspect (orientation of the front of the building using the 8 principal compass points);
- Wall material (brick, block, stone, wood, concrete, metal, sheet materials or other), construction (solid, unfilled cavity or filled cavity) and presence of other materials (rendering, hanging tiles, wooden weather boards, plastic or metal cladding) and their condition;
- Presence and form of roof (absent, pitched (gable end or hipped) or flat), presence of roof void, type of roof covering (tiles, slates, felt or similar, thatched, corrugated sheet

GRP, concrete or wood) and condition of roof covering (no, minor, moderate or severe damage/decay/gaps);

- Presence and form of eaves (presence of soffits, fascia boards, barge boards) and condition (no, minor, moderate or severe damage/decay/gaps); and
- Presence and condition of flashing (no, minor, moderate or severe damage/decay/gaps).

7.1.6 The exterior of all buildings was then searched for PRFs and evidence of bats. The search was made from the ground with the aid of binoculars and a high-powered torch. An endoscope was also used to close inspect any PRFs safely accessible using this method. PRFs looked for included:

- Presence of loft voids and wall cavities;
- Gaps around windows, doors and lintels;
- Lifted lead flashing;
- Loose or missing roof, ridge or hanging tiles;
- Gaps between stones or bricks where mortar is absent;
- Other gaps or cracks between various elements of the building structure; and
- Potential access points to an internal cavity such as a cavity wall, loft space, eaves or behind cladding (such as hanging tiles and weather boarding).

7.1.7 The search for bats and evidence of bats focused on the following key areas:

- The ground and walls below potential access points and wall cladding;
- Window recesses, especially window sills; and
- Accessible cracks and crevices.

7.1.8 The location of the PRFs and any evidence found were recorded using a GPS enabled mobile mapper, and photographs and/or diagrams of the building when necessary. Each PRF was given a unique identification code.

Ground Level Tree Assessment

7.1.9 A Ground Level Tree Assessment (GLTA) was undertaken on any tree present within the surveyed area to catalogue any available roost resource. During the assessment a detailed and systematic inspection of the exterior of the tree was undertaken to look for PRFs that could be used by bats. Close-focussing binoculars, a high-powered torch and endoscopes were used to undertake the assessment. PRFs searched for included:

- Natural crevices and holes;
- Woodpecker and rot holes;
- Loose bark, splits and cracks;
- Bird and bat boxes; and
- Presence or absence of dense ivy or dense epicormic growth.

- 7.1.10 Each PRF when present was given a unique identification code.
- 7.1.11 The search for bats and evidence of bats focused on these PRFs and the surfaces and ground beneath them.
- 7.1.12 Information collected on the tree included: species, tree age, tree condition, diameter at breast height and tree height, plus a photograph of each tree and its location.
- 7.1.13 Details recorded regarding the PRF included a description of the PRF, height of the PRF above the ground, position and aspect. Accessible PRFs were further inspected using an endoscope.

Contextual Information

- 7.1.14 For each structure or tree with a PRF, contextual information was also recorded to aid the assessment. This was distance to hedge, distance to woodland, distance to water, potential commuting corridors, potential foraging corridors, setting, surrounding area habitat quality and the level of disturbance.

Categorisation of Results

- 7.1.15 The suitability of foraging and commuting habitat, as well as bat roosting habitat within structures was identified and classified as none, negligible, low, moderate or high as included in Table 7.1.

Table 7.1: Suitability of structures for roosting and habitats for commuting and foraging

Suitability	Structures	Commuting and Foraging Habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats, however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection,	Habitat that could be used by small numbers of bats as flight-paths such as gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat.

Suitability	Structures	Commuting and Foraging Habitats
	appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats).	Suitable but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

7.1.16 The suitability of trees as roosting habitat was assessed independently from the structures and classified as none, further assessment required (FAR) and PRF present (PRF) as seen in Table 7.2.

Table 7.2: Guidelines for assessing the suitability of trees for bats

Suitability	Description
None	Either no PRFs in the tree or highly unlikely to be any
FAR	Further Assessment Required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

7.2 Results

Preliminary Roost Assessment of Built Structures

7.2.1 Four buildings (B1-B4) were identified within the site boundary (see Figure 3) (Figure 4a, Photographs 2-6) and were assessed for potential to support roosting bats; the results are as follows and are summarised in Table 7.3.

7.2.2 The site is assessed to have low to moderate suitability for foraging and commuting bats due to its location backing onto established urban residential gardens and its proximity to the railway green corridor to the north and east. Foraging on site is however restricted to the areas of scattered scrub and the trees along the south boundary that overhang the site.

Building 1 (B1)

7.2.3 The main building, a Victorian style two-storey school building, now disused, has a complex roof structure (see Figure 3) with cross-gables, multiple ridges, and dormers covered in traditional clay peg tiles. Missing and broken roof and ridge tiles were recorded across the building, with other potential features for roosting bats including lifted lead flashings, gaps at wall level, loft vents and gaps around boarded windows (Figure 4c, Photograph 14-18). Although the buildings were not entered due to health and safety concerns, the presence of lofts was assumed as several loft vents were observed (Figure 4c, Photograph 15).

7.2.4 The building was assessed as having high suitability for roosting bats as the number and type of features could provide roosting opportunities for a large number of bats within loft areas or underneath the tiles.

Building 2 (B2)

7.2.5 A small single-story building is located centrally within the site. The roof is gable ended and the roof is in a state of disrepair with multiple missing and broken tiles (Figure 4b, Photograph 12; Figure 4c, Photograph 13). Some mortar was missing around ridge tiles and a gap was observed between the bargeboard and the gable wall.

7.2.6 The building was assessed as having high suitability for roosting bats

Building 3 (B3)

7.2.7 A two story brick building located to the east of the site with a gable end slate roof. A section of the ridge was missing which could allow bat access into the building (Figure 4b, Photograph 11).

7.2.8 The building was assessed as having moderate suitability for roosting bats.

Building 4 (B4)

7.2.9 A prefabricated cabin building located to the northeast corner of the site. The building construction is metal panels with a shallow pitched metal roof (Figure 4a, Photograph 6). No gaps or any other potential roost features were observed in this building and was therefore assess as having negligible suitability for roosting bats.

Table 7.3: Summary of PRA results of buildings

Attribute	B1	B2	B3	B4
Type	Educational building	Educational building	Educational building	Educational building
Age	1883	Early 1900s	Early 1900s	Modern construction
Construction	Brick work	Brick work	Brick work	prefabricated
Exposure of PRF/crevice/void to wind and rain	Limited	Limited	Limited	N/A
Size of PRF	Small (tiles) and void (loft)	Small (tiles) and a void (loft)	Small (tiles) and potentially a void (loft)	N/A
Setting	Urban	Urban	Urban	Urban
Level of disturbance/lighting	Low	Low	Low	Low
Evidence of bats?	None external - unknown internal	None external - unknown internal	None external - unknown internal	N/A
Overall roosting suitability	High	High	Moderate	Negligible

Ground Level Tree Assessments

- 7.2.10** A single tree was identified during the survey; however this didn't support PRFs that could be used by bats, with the tree being classified as having no suitability to support roosting bats.

8. The Statutory Biodiversity Metric

8.1 Methods

- 8.1.1 The statutory biodiversity metric quantifies losses and gains in biodiversity in terms of biodiversity units. Following the field survey, the data was used to carry out a biodiversity metric calculation using the statutory biodiversity metric calculation tool for calculating biodiversity net gain values published by DEFRA: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>
- 8.1.2 The metric calculates the biodiversity value by multiplying the area or length (hectares or kilometre), distinctiveness (habitat type), condition (quality) and strategic significance (local significance for biodiversity) of each habitat parcel. To calculate the biodiversity units which may be achieved post-development, risk multipliers are also introduced to account for difficulty of habitat creation (delivery/risk factor) and time for created habitats to reach target condition (time to target factor). The calculations were carried out using the statutory biodiversity metric calculation tool for calculating biodiversity net gain values (Defra, 2023a).
- 8.1.3 The baseline biodiversity unit calculation in this report represents the biodiversity value of the site as it currently stands.
- 8.1.4 Area based habitats, hedgerow habitats and river habitats are considered separately in the tool to account for the differences in their ecological values and functions.

Baseline Formula

- 8.1.5 The baseline biodiversity value calculation represents the pre-development biodiversity value of the site as it was at the time that the baseline habitat survey was undertaken.
- 8.1.6 To calculate the baseline biodiversity value, habitat distinctiveness and condition are given numerical 'scores' which are multiplied with hectares or kilometres of habitat. The formula for calculating baseline biodiversity units is as follows:

$$(A \times D \times Q \times S) = AHBU$$

Where:

- A = Area (ha) or length (km)
- D = Distinctiveness
- Q = Condition
- S = Strategic significance
- AHBU = Area or length-based habitat biodiversity units

Distinctiveness

- 8.1.7 Each habitat parcel is assigned a multiplier based on habitat distinctiveness. This includes '*consideration of species richness and rarity; the extent to which the habitat is protected by designations; and the degree to which a habitat supports species rarely found in other habitats*' (Defra, 2023b).
- 8.1.8 Habitats such as hard standing and buildings are assumed to have very low distinctiveness and are not included.

Condition

- 8.1.9** To enable the calculation of BNG units, an assessment of the condition of each habitat was made in the field in accordance with the statutory biodiversity metric condition assessments (Defra, 2023c). These sheets provide a series of condition assessment criteria, specific to each habitat type. Once all applicable criteria have been assessed, a condition score of good, moderate or poor is applied, based on the scoring instructions provided within the condition sheets.
- 8.1.10** The condition of habitats such as hard standing and buildings is not assessed.

Strategic Significance

- 8.1.11** The location of habitat parcels is factored into the calculation based on whether it has been identified as significant for nature conservation within local plans and strategies.

8.2 Results

- 8.2.1** The headline biodiversity metrics results are shown on Table 8.1.

Table 8.1: BNG baseline results

Unit Type	Baseline Units
Habitat	0.34
Hedgerow	0.00
River	0.00
Total	0.34

9. Constraints, Opportunities and Recommendations

9.1 General Recommendations

- 9.1.1 Should the works proposals change significantly and other habitats are to be affected, an ecologist should be contacted for advice.
- 9.1.2 It is recommended that, to safeguard ecology during the construction phase, a CEMP (Construction Ecological Management Plan) is produced. This document will outline all the recommended actions to minimise impacts to habitats and species during construction.
- 9.1.3 A Species Enhancement Plan (SEP) is recommended to ensure the development maximises its potential benefits for biodiversity post-construction. This document would include recommendations such as:
- Bird and bat boxes to be fitted to the buildings on the development to benefit priority and local action plan species such as house sparrow, swift and common pipistrelle. Ideally, bird boxes should face between north and east while bat boxes should be placed facing south, south-east or south-west. Boxes should be placed above three metres from the ground to avoid disturbance but remain sheltered from strong wind; and
 - The lighting regime to be as sensitive as possible to minimise light spill onto semi-natural habitats.

9.2 Designated Sites

- 9.2.1 It is considered reasonably unlikely that the works will have a direct effect on any of the designated sites identified during the desk study. This is because of their distance from the site, the small-scale of the works, and the absence of direct pathways for damage.

9.3 Priority Habitats

- 9.3.1 It is considered reasonably unlikely that the works will have an effect on any of the priority habitats identified during the desk study. This is because of their distance from the site, the small-scale and temporary nature of the works, and the absence of direct pathways for damage.

9.4 Protected Species and Species of Conservation Concern

Amphibians

- 9.4.1 The desk study returned records for common toad within the 1 km study area. The habitat survey found no suitable terrestrial resting habitat for amphibians on the site, and no suitable breeding ponds within 250 m of the site which will be affected by the works. It is therefore considered reasonably unlikely that amphibians will be impacted by the works, and they will not be discussed further in this report.

Badger

- 9.4.2 The desk study returned no records for badger and no signs of badger were found during the field survey. There is no suitable habitat on site, including for sett building, with limited connectivity to the wider landscape. It is thought reasonably unlikely that badgers will be present on site and therefore they will not be discussed further in this report.

Reptiles

- 9.4.3 The desk study returned records for common lizard and grass snake within the 1 km study area. No habitats on site are considered suitable to support reptiles. It is, therefore, considered reasonably unlikely that development of the site will result in the killing or injury of reptiles, and they will not be discussed further in this report.

Birds

- 9.4.4 Records of common breeding bird species were returned in the desk study, and there is suitable habitat (buildings, scrub, and tree) present for nesting birds.
- 9.4.5 As summarised in Section 3, all bird species are protected, including active nests.
- 9.4.6 Suitable habitat for nesting birds should be retained where possible or removed outside of the breeding birds season, i.e. removed between September and February, inclusive. A check for nesting birds immediately prior to any works is also recommended for nesting feral pigeon (which can nest year-round). If nesting birds are found to be present the works should be delayed until the nest is no longer active.

Bats

- 9.4.7 Records of bat species were found within the 1 km study area and the buildings on the site have the potential to support roosting bats.
- 9.4.8 The legal protection afforded to bats is summarised in Section 3. Killing or injury of bats would be an offence, as well as damage, obstruction or destruction of a roosting site. Disturbance of roosting bats is also an offence.
- 9.4.9 B1 and B2 have been classified as having high suitability to support roosting bats, and B3 has been classified as having moderate suitability for roosting bats based on external and internal potential roost features, including slipped and lifted tiles on the roof, lifted lead flashing, gaps in the wall, loft vents and the presence of lofts. All buildings on site, except from B1, are proposed for demolition. B1 will be partially retained and modified to accommodate the new dwellings.
- 9.4.10 Further survey is required to determine presence/likely absence of roosting bats within B1, B2 and B3. At least three dusk roost emergence surveys for B1 and B2, and at least two dusk roost emergence surveys for B3 are recommended, according to Best Practice Guidelines (Collins, Ed., 2023). Surveys should be conducted between May and September, with no more than one survey in September, and spaced at least three weeks apart (Collins, Ed., 2023).
- 9.4.11 If bats roosting bats are found to be present within any of the buildings, which are proposed for demolition or modification, a Natural England (NE) European Protected Species (EPS)

Mitigation Licence will be required prior to any works affecting said building, including disturbance such as noise and vibration. Depending on whether surveys have been sufficient to enable confident characterisation of the roost (if present), additional surveys may be required to classify the recorded roost to determine species and roost type.

- 9.4.12 Construction work and lighting at night should be avoided. If works at night are necessary, any lighting used to facilitate the works should be implemented using a sensitive lighting regime. This should be designed in consultation with a suitably qualified ecologist and include the focus of lighting to be on the works area only and directed away from suitable habitat for commuting and foraging bats (hedgerow). Any light spill in the surrounding habitats should be minimised to prevent disturbance to any foraging or commuting bats that may be present.
- 9.4.13 It is recommended that lighting strategy should be included within the CEMP, ensuring that retained and created suitable bat foraging and commuting habitat is protected from increased illumination during and post development. The lighting strategy should be produced according to ILP Guidance Note GN08/23.

Hedgehog

- 9.4.14 Records of hedgehog were returned within the desk study. No suitable resting habitat for hedgehog was recorded on the site, however it is possible that hedgehogs forage and commute through the site. Although hedgehog is not a protected species, it is a species of conservation concern.
- 9.4.15 It is recommended that any habitat suitable for sheltering hedgehog, that is subject to clearance, should be checked prior to works. Any suitable refugia on site, such as log piles, should be retained wherever possible. Should hedgehogs be discovered on site at any time during their active period (April to October inclusive), they should be allowed to move away on their own volition or if in danger moved carefully with gloved hands to a sheltered area (e.g. dense scrub). Should hedgehogs be discovered on site outside of the active season (April to October inclusive), an ecologist should be contacted for advice on how to proceed.

Invertebrates

- 9.4.16 Records of invertebrates including a number of butterflies such as small heath (*Coenonympha pamphilus*), small skipper (*Thymelicus sylvestris*), and small copper (*Lycaena phlaeas*); and stag beetle (*Lucanus cervus*) were returned in the desk study. The closest record is located 105m north east of the site.
- 9.4.17 Habitats present onsite are not suitable for most of the species listed. Additionally, habitats present onsite are common and widespread, and present sub-optimal conditions, with low botanical species diversity and therefore, are unlikely to support an important assemblage of invertebrate species. No further recommendations will be included in this report for invertebrate species.

9.5 Invasive Plant Species

- 9.5.1 The desk study found no records of invasive (listed under Schedule 9 of the Wildlife and Countryside Act, 1981) within the study area but records of two species included in the LISI, buddleia and snowberry, were recorded.
- 9.5.2 Virginia-creeper, an invasive plant species under Schedule 9, and green alkanet and buddleia, listed on the London invasive species list, were found to be present onsite, therefore appropriate measures should be put in place to ensure that the works do not result in the spread of the species.

10. Biodiversity Net Gain

- 10.1.1 A separate BNG report will be provided by Thomson following the PEA and PRA survey (Thomson, 2024).
- 10.1.2 Additional enhancements for biodiversity are recommended and can include:
- Bird and bat boxes integrated into new buildings and the retained Building 1 to benefit priority and local action plan species such as house sparrow, swift and soprano pipistrelle. Ideally, bird boxes should face between north and east, while bat boxes should be placed facing south, south-east or south-west. Boxes should be placed above three metres from the ground to avoid disturbance but remain sheltered from strong wind.
 - Inclusion of 13cm x 13cm holes at the base of the fences between gardens to allow hedgehogs to pass through and maintain connectivity among private gardens

11. Conclusion

- 11.1.1** The desk study has found that the site is not located within designated sites for nature conservation or within priority habitats for nature conservation, as far as is known from available data sets. There are designated sites and priority habitats within 1 km of the site. Provided the development does not result in harmful off-site emissions to air, it is unlikely that the works would result in any impact on these ecological features.
- 11.1.2** The desk study found records of protected species and species of conservation concern within the 1km study area. There is potential for several of these species to be present on the site and consequently further survey is required to determine the suitability of habitats on the site to support these species. Based on a reasonable likelihood that roosting bats may be present within B1, B2 and B3, it is recommended that further surveys for roosting bats are carried out.
- 11.1.3** Provided the recommended further surveys are conducted, alongside mitigation, it is considered reasonably unlikely that the works would result in any impact on the identified ecological features and the works should remain in-line with legislation and policy.

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Appendix 1: Plant Species and Abundance

g4 (203, 813) - Modified grassland (mature tree, educational premises open space)

Common Name	Scientific Name	Abundance
Creeping cinquefoil	<i>Potentilla reptans</i>	A
Perennial rya-grass	<i>Lolium perenne</i>	A
Dandelion	<i>Taraxacum officinale agg</i>	F
False oat-grass	<i>Arrhenatherum elatius</i>	F
Mallow	<i>Malva sylvestris</i>	F
Cock's-foot	<i>Dactylis glomerata</i>	O
A dock	<i>Rumex sp.</i>	O
Ribwort plantain	<i>Plantago lanceolata</i>	O
Wall barley	<i>Hordeum murinum</i>	O
Yorkshire fog	<i>Holcus lanatus</i>	O

u1f (10, 82, 524, 813) - Sparsely vegetated urban land (scattered scrub, vacant or derelict land, invasive non-native species , educational premises open space)

Common Name	Scientific Name	Abundance
Buddleia	<i>Buddleja davidii</i>	D
Willowherb	<i>Epilobium sp.</i>	F
Bristly ox-tongue	<i>Helminthotheca echinoides</i>	O
Perennial rya-grass	<i>Lolium perenne</i>	O
Sycamore seedling	<i>Acer pseudoplatanus</i>	O
Wall barley	<i>Hordeum murinum</i>	O
Bramble	<i>Rubus fruticosus</i>	R
Green alkanet	<i>Pentaglottis sempervirens</i>	R
Herb-robert	<i>Geranium robertianum</i>	R
Horseweed	<i>Erigeron sp.</i>	R
Ragwort	<i>Senecio sp.</i>	R
Walnut seedling	<i>Juglans sp.</i>	R

u1e (518, 524, 612, 853) - Built linear features (neglected, fence, invasive non-native species , mortared wall)

Common Name	Scientific Name	Abundance
Common ivy	<i>Hedera helix</i>	Locally A
Honeysuckle	<i>Lonicera sp.</i>	Locally A
Large bindweed	<i>Calystegia silvatica</i>	Locally A
Virginia-creeper	<i>Parthenocissus quinquefolia</i>	Locally A
Buddleia	<i>Buddleja davidii</i>	F

Appendix 2: Biodiversity Metrics Condition Assessment

Condition Sheets: GRASSLAND LOW Habitat Type

Parcel reference		g4-1
Condition Assessment Criteria		Criterion passed (Yes or No)
A	There are 6-8 vascular plant species per m² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	No
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects/vertebrates and invertebrates to live and breed.	No
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus agg.</i> may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Yes
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	No
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	Yes
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	No
Essential criterion achieved (Yes or No)		No
Number of criteria passed		3
Condition Assessment Result (out of 7 criteria)	Condition Assessment Score	Score Achieved x/√
Passes 6 or 7 criteria including passing essential criterion A	Good (3)	x
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)	x
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)	√

Notes

Footnote 1 - Creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, curled dock *Rumex crispus*, broad-leaved dock *Rumex obtusifolius*, common nettle *Urtica dioica*, creeping buttercup *Ranunculus repens*, greater plantain *Plantago major*, white clover *Trifolium repens* and cow parsley *Anthriscus sylvestris*.

Footnote 2 - For example, this could include small, scattered areas of bare ground allowing for plant colonisation, or localised patches not exceeding 5% cover.

Footnote 3 - Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.

Footnote 4 - Wildlife and Countryside Act 1981 (as amended).

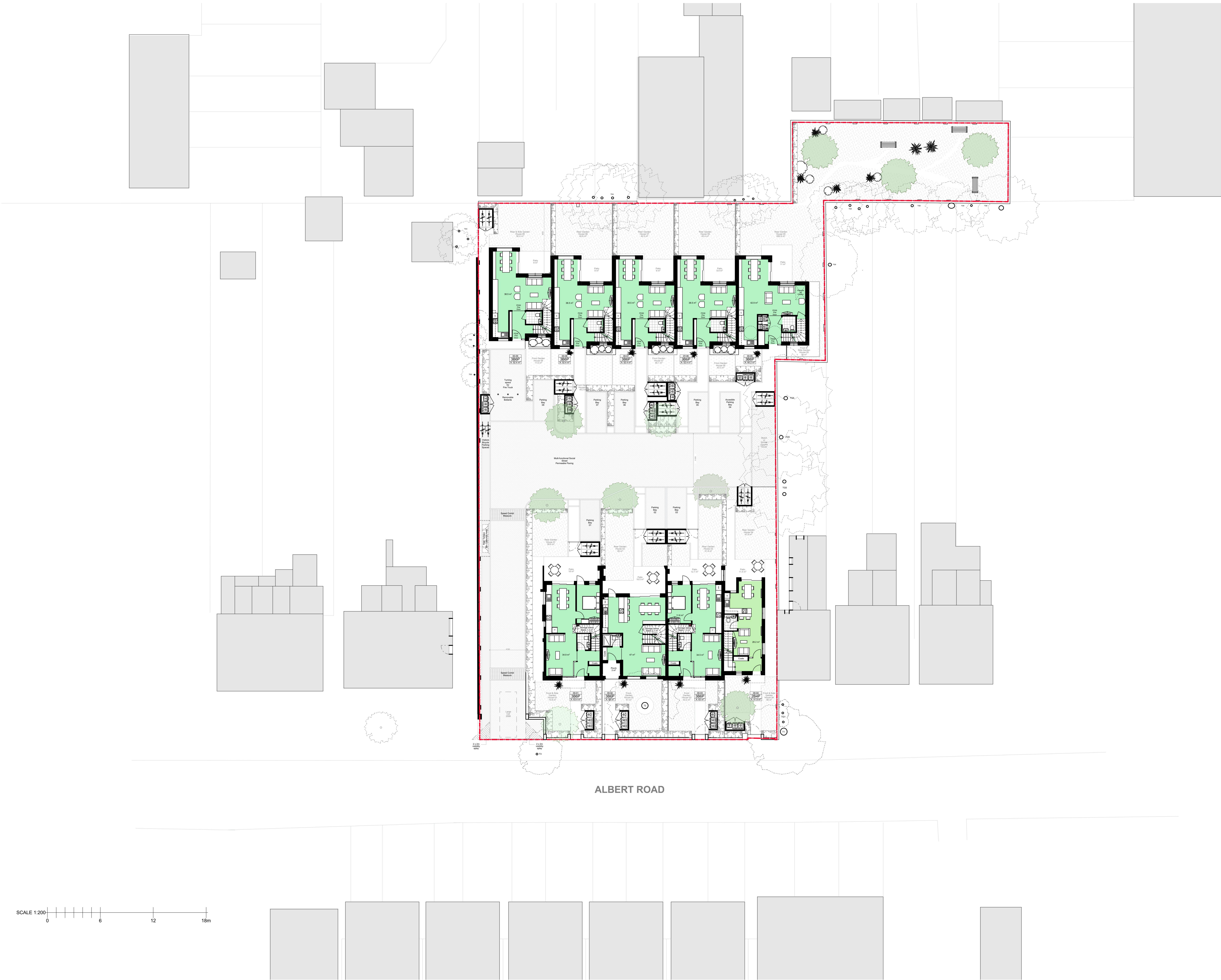
Condition Sheets: URBAN Habitat Type

Parcel reference		u1f-1
Condition Assessment Criteria		Criterion passed (Yes or No)
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	No
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Yes
C	Invasive non-native plant species (listed on Schedule 9 of WCA ¹) and others which are to the detriment of native wildlife (using professional judgement) ² cover less than 5% of the total vegetated area ³ . Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	No
Essential criteria relevant for habitat type achieved (Yes or No)		No
Number of criteria passed		1
Condition Assessment Result	Condition Assessment Score	Score Achieved x/√
Results for habitats requiring assessment of 3 core criteria only:		
Passes all 3 core criteria; AND Meets the requirements for Good condition within criterion C.	Good (3)	x
Passes 2 of 3 core criteria; OR Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)	x
Passes 0 or 1 of 3 core criteria.	Poor (1)	√
Notes		
Footnote 1 - Wildlife and Countryside Act 1981 (as amended). Footnote 2 - Sources of information about detrimental non-native species can be found on the GB Non-native Species Secretariat (GBNNSS) website: "Home » NNSS (nonnativespecies.org) and Natural England Access to Evidence page should also be checked for up-to-date information: Horizon-scanning for invasive non-native plants in Great Britain - NECR053 (naturalengland.org.uk) For criterion C - For green roof habitat types only - buddleia <i>Buddleja davidii</i> should be assessed alongside Schedule 9 species. This species impairs the health of the local ecosystem and reduces the biodiversity potential of the roof. It is also a sign that a roof has not been planted and seeded correctly in subsequent years. Footnote 3 - Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement. Footnote 4 - Use professional judgement. Sources of information about non-native species that are not detrimental to native wildlife can be found on the GBNNSS website. Alternative plants » NNSS (nonnativespecies.org)		

Condition Sheets: INDIVIDUAL TREES Habitat Type

Parcel reference		T1
Condition Assessment Criteria		Criterion passed (Yes or No)
A	The tree is a native species (or at least 70% within the block are native species)	Yes
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Yes
C	The tree is mature (or more than 50% within the block are mature).	Yes
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	No
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	No
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	No
Number of criteria passed		3
Condition Assessment Result	Condition Assessment Score	Score Achieved x/√
Result out of 5 criteria		
Passes 5 or 6 criteria	Good (3)	x
Passes 3 or 4 criteria	Moderate (2)	√
Passes 2 or fewer criteria	Poor (1)	x
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.		
Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from: Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk) And Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)		

Appendix 3: Proposed Ground Floor Plan



NOTES:
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--- Site Boundary

16	FOR PLANNING	BH	BH	19/11/2024
15	FOR PLANNING	BH	BH	19/09/2024
14	FOR PLANNING	BH	BH	10/09/2024
13	FOR PLANNING	BH	BH	18/07/2024
12	FOR PLANNING	BH	PM	06/06/2024
11	FOR PLANNING	BH	PM	21/05/2024
10	FOR PLANNING	BH	PM	16/04/2024
09	FOR PLANNING	BH	PM	11/04/2024
08	FOR PLANNING	BH	PM	21/03/2024
07	FOR PLANNING	BH	PM	05/01/2024
06	FOR PLANNING	BH	PM	20/11/2023

REV DESCRIPTION DRAWN CHECKED DATE

CREATE
DESIGN + ARCHITECTURE
Wigglesworth House 69 Southwark Bridge Road London SE1 8HH
+44 207 021 0267 info@createdesign.org www.createdesign.org

CLIENT: MERCURY LAND HOLDINGS

PROJECT: 67 ALBERT ROAD
BUILDING: RM1 2PS
ADDRESS:

DRAWING NAME: PROPOSED GROUND FLOOR PLAN

DRAWING SERIES: 0000-0199 PLANNING PLANS

CDA REF: 673 SCALE(S): 1:200 ORIGINAL PAPER SIZE: A1

REVISION: REVISION DESCRIPTION: FOR PLANNING

PROJECT	ORIGINATOR	VOLUME	LEVEL	TYPE	ROLE	CLASS	NUMBER
673	- CDA	- ZZ	- 00	- DR	- A	- 05	- 0100