



Brighter strategies
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Project: Brockwell Live 2026
Report: Ecological Enhancement Plan

QUALITY ASSURANCE

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1.0 EXECUTIVE SUMMARY

Greengage Environmental Limited (Greengage) was commissioned by Brockwell Live to produce an Ecological Enhancement Plan (EEP) for an area of Brockwell Park, hereafter referred to as 'the park'.

This EEP has been produced to address the requirements of Condition 11 of the of the planning consent (planning permission reference: 25/03733/RG4) for temporary use of an area of the park, hereafter referred to as 'the site' to host the suite of live music events in 2026, hereafter referred to as 'the events'.

The site has been subject to a Preliminary Ecological Appraisal (PEA)¹ and an Ecological Impact Assessment (EclA)², produced in 2025 and 2026 respectively. The EclA highlighted ecological features with potential to be affected by the events proposals for the site, including Brockwell Park Site of Importance for Nature Conservation (SINC), habitats including grassland/soils, trees, and hedgerows, common amphibians, bats (foraging, commuting and roosting), breeding birds, reptiles, hedgehog *Erinaceus europaeus*, and invertebrates.

Ecological enhancement features for the park include:

- Erection of 50 bat boxes;
- Erection of 50 bird boxes, with varied entrance hole shape and sizes to attract varied species;
- Creation of 5 large brash piles;
- Placement of herpetofauna hibernacula throughout the park, including 20 log piles and 5 hibernacula;
- Installation of five invertebrate hotels;
- Acoustic monitoring regime whereby species outcomes would be assessed going forward and reactive additional mitigatory or compensatory actions implemented where identified as necessary; and,
- Addition of an optional nature restoration levy for attendees or corporate sponsors to contribute towards.

This EEP aims to collate the park-wide ecological enhancement features design concepts and future maintenance and monitoring of these ecological enhancement features at the park. The ecological enhancement features specified will positively contribute to enhancing the ecological and wildlife value of the site/park, meet objectives of planning permission conditions, contemporary best practice and relevant planning policy, and complement local wildlife populations and Biodiversity Action Plans (BAPs).

Information boards will be provided to inform park users of the wildlife and associated enhancements within the park.

This EEP sets out the installation, maintenance and management actions required for ecological enhancement features to succeed.

2.0 INTRODUCTION

Greengage Environmental Limited (Greengage) was commissioned by Brockwell Live to produce an Ecological Enhancement Plan (EEP) for a suite of music festivals to be held in 2026 in area of Brockwell Park, hereafter referred to as 'the site'.

The wider Brockwell Park, outside of the site is hereafter referred to as 'the park'.

This EEP has been produced to address the requirements of Condition 10 of the of the planning consent (planning permission reference: 25/03733/RG4) at the site to host the suite of live music events in 2026, hereafter referred to as 'the events'. The events are to include temporary use of part of Brockwell Park for Brockwell Live 2026 for up to 32 days (including wet weather buffer days), involving the installation and de-installation of temporary infrastructure including fencing, stages, lighting, public address (PA) systems and other temporary structures and ancillary works.

Specifically, Condition 11 of the granted planning permission states: *"No development shall commence, including any installation, setup, construction or enabling works, until a PreEvent Ecological Enhancement Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall show the precise locations, specifications and installation details for the following ecological enhancements within the boundary of Brockwell Park:*

- a) 50 bird boxes of varied entrance sizes and designs;*
- b) a minimum of 5 brash piles;*
- c) at least 20 log piles; and*
- d) at least 5 herpetofauna hibernacula.*

The approved ecological enhancement measures shall then be implemented in collaboration with Lambeth Parks Team in full within six months of the completion of the event derig period.

Reason: To ensure that the ecological enhancements associated with the event are properly planned, secured and delivered, and to support biodiversity in accordance with Policies EN1 and EN4 of the Lambeth Local Plan (2021)."

2.1 AIMS AND OBJECTIVES

This EEP aims to detail the specifications for the park-wide ecological enhancement features, provide the locations where these features will be situated, describe the requirements for installation and set out the long-term management and monitoring regime to ensure these ecological enhancement features deliver benefits to nature at the park.

The ecological enhancement features specified will positively contribute to enhancing the ecological and wildlife value of the park, meet objectives of planning permission conditions, contemporary best practice and relevant planning policy, and complement local wildlife populations and the Lambeth and London Biodiversity Action Plans (BAPs).

Installation of specific features described in this EEP will be undertaken within six months of the event de-rig, supervised by a suitably qualified ecologist (SQE). Otherwise, installation works will be undertaken by a specialist contractor with reference to this EEP.

A management plan is produced which sets out the requirements for the successful establishment and long-term monitoring of the ecological enhancement features. This is provided at Section 5.0.

2.2 GRANTED SCHEME

The site at the park will be used temporarily to host a suite of live music events in 2026.

As detailed in the Turley (2025) Planning Statement³, the event proposals include the following details:

The 2026 Brockwell Live event series comprise a number of ticketed music and cultural festivals, delivered within Brockwell Park. It takes place over two weekends in late May 2026, including the late May bank holiday, and hosts the following events as part of the series; Field Day, Cross the Tracks, City

The proposed temporary event is categorised as a 'major event' based on the number of attendees (over 20,000), as defined by EventLambeth policies. The event's licence will include a maximum capacity of 29,999 attendees (including staff).

2.3 SITE LOCATION AND DESCRIPTION

The site extends to approximately 16.68 hectares (ha) and is centred on Ordnance Survey National Grid Reference (OS NGR): TQ 3175 7428, OS Co-ordinates 531759, 174280.

The site is comprised of three distinct parcels, the event site, the 'boneyard' and the vendors parking. The habitats comprised predominantly of modified grassland, individual trees, native hedgerows, buildings, developed land; sealed surfaces and sparsely vegetated urban land.

Areas of meadow, ponds, other buildings and further modified grassland and trees are found throughout the park.

The park is located in Herne Hill, a highly urban area of south London. Surrounding areas are subject to high levels of light and noise pollution. The immediate area surrounding the site is primarily urbanised, with roads and commercial and residential buildings located immediately adjacent to the park boundary around its entirety. Norwood Road (A215) runs along the eastern park boundary and Tulse Hill (A204) runs along the western park boundary, with Brixton Road (A23) located approximately 0.5 km west of the site at its closest point.

Urban public green spaces in the surrounding area of the Site includes Peabody Hill Wood located approximately 100m southeast of the site, Dulwich Sport Grounds located approximately 315m east of the site, Rosendale Allotments located approximately 320m southeast of the site, Rush Common located approximately 490m west of the site, Place Road Nature Gardens located approximately 700m southwest of the site, and Belair Park located approximately 750m east of the site. These are relatively well connected through linear corridors along tree-lined streets and the railway line embankments running north to south, through Herne Hill approximately 50 m west of the site.

The closest statutory site is Unigate Wood Local Nature Reserve (LNR) located approximately 1.98 km south of the site boundary. Wimbledon Common Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) located approximately 7.9 km west of the site. Including the park itself, 32 Site of Importance for Nature Conservation (SINCs) were identified within 2 km of the site. Those designated sites within 1km are relatively well connected, as described above. Those further afield are less well connected to the site, given the land use and distance between them and the site.

3.0 ECOLOGICAL BACKGROUND

3.1 BASELINE CONDITIONS

The site has been subject to a Preliminary Ecological Appraisal (PEA)¹ in 2025 and an Ecological Impact Assessment (EclA)². The EclA also detailed results from phase 2 ecology surveys undertaken in relation to the assessment of the 2025 Country Show event at the site, to inform the impact assessment for future events. Phase 2 ecology surveys included a Ground Level Tree Assessment (GLTA) and automated static monitoring of bats.

The EclA² highlighted the following ecological features have the potential to be affected by the events proposals for the site:

- Brockwell Park SIN;
- Habitats:
 - Grassland/soils;
 - Trees; and
 - Hedgerows.
- Common amphibians;
- Bats:
 - Foraging and commuting; and
 - Roosting.
- Breeding birds;
- Reptiles;
- Hedgehog; and
- Invertebrates.

During the Ground Level Tree Assessment (GLTA) a total of seven trees were identified as having Potential Roosting Features (PRFs) suitable to support multiple bats (PRF-M) and numerous trees identified as having PRFs suitable to support individual bats (PRF-I).

The automated static monitoring of bats identified at least four species of bat present within the site/park. Of these 56% of all registrations were from common pipistrelle *Pipistrellus pipistrelle* and 37% from soprano pipistrelle *Pipistrellus pygmaeus*. Between the three timeframes drop off in bat numbers were most significant for common pipistrelles (821 average registrations/night) during the event compared to baseline (1325.6 average registrations/night) and soprano pipistrelle (353 average registrations/night) during the event compared to baseline (885.4 average registrations/night). Average nightly registrations for both recovered and increased in numbers post-Country Show and 2025 music events. Activity levels for *Myotis Myotis* sp. remained consistent across the survey period.

Therefore, the ecological enhancement features will provide additional nesting/roosting habitats for these species known to be using the park.

3.2 BIODIVERSITY ACTION PLANS

In accordance with the aims and objectives of this document, a review of the relevant BAPs and local conservation targets was undertaken. This review, along with the results of the EclA, provides the context for ecological enhancement at the site.

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

The UK BAP was succeeded in 2012 by the UK-Post 2012 Biodiversity Framework which informed the creation of the Biodiversity 2020 strategy; England's contribution towards the UK's commitments under the United Nations Convention of Biological Diversity. Subsequently, this has been replaced by the Kunming-Montreal Global Biodiversity Framework to 2030⁴.

Despite this, the UK BAP priority species list and conservation objectives still remain valid through integration with local BAPs (which remain valid), and in the form of the Habitats and Species of Principle Importance list (as required under section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)⁵.

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

The Lambeth⁶ and London⁷ BAPs highlight the importance of particular habitats for supporting biodiversity. Habitats of relevance to this EEP include:

- Built environment;
- Parks and open spaces;
- Woodlands and trees; and
- Parks and urban greenspaces.

Species targeted by the Lambeth and London BAPs of relevance to this EEP include:

- Swift *Apus apus*;
- House sparrow *Passer domesticus*;
- Bats; and
- Stag beetle *Lucanus cervus*.

3.3 COMPETENCIES

Chloe Peace, Consultant, has a BSc (Hons) in Zoology and is a Qualifying member of CIEEM. Chloe has over three years' of experience in ecological survey and assessment in consultancy. Her experience spans the aquatic and terrestrial environments, with particular interest in Biodiversity Net Gain (BNG), natural capital, habitat management and conservation, and ornithology.

Sam Barker, Senior Consultant, has an undergraduate degree in Environmental Science (BSc Hons), holds a Natural England Great Crested Newt Licence and is a Full member of CIEEM. Sam has over eight years' experience of delivering ecological assessments and nature led strategies.

Paul White, Associate Consultant, has a Bachelor's degree in Marine Biology (BSc Hons), a Natural England Great Crested Newt Licence and Dormouse Licence, and is an Associate member of CIEEM. Paul has over 16 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments. This report was written by Chloe Peace, reviewed by Sam Barker and verified by Paul White who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

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

4.0 MITIGATION MEASURES

Mitigation measures for the installation, monitoring and management of these ecological enhancement features included within this EEP are included below as outlined in the EclA²:

- Embedded mitigation
 - Temporary surfaces for high traffic routes are installed across areas of grassland that heavy machinery and vehicles are required to access to minimise damage to the grassland and avoid root protection Areas (RPAs).
 - The RPAs of trees within the site boundary will be demarcated by root protection barriers during set-up and break-down periods. Some of these will be removed during the event to allow for safe movement of people during the event.
 - Heavy construction work (i.e., the work that causes the most noise) associated with the set-up and breakdown of the events will occur 0800-2000.
 - One day after event infrastructure breakdown and removal (weather permitting), third-party contractors will be booked to start post show ground restoration works. Regular monitoring of the site to check on grass growth and park health will undertaken June to September 2026 with further remedial actions carried, as required.
- Operational
 - The RPAs of trees within the site boundary will be demarcated by root protection barriers for the copse and other high value trees.
 - Lighting will required during events to help with access and egress and movement of staff and members of the public, once the event is over these will be turned off.
 - The lighting will directed away from trees, with zero uplighting of trees.
 - Asymmetric beam floodlights (where possible and practicable), will be orientated so that the glass is parallel to the ground, ensured that the light is cast in a downward direction avoiding horizontal spill.
- Presence of an Ecological Clerk of Works (ECoW) during the install and breakdown process to undertake hand searches of any sensitive habitat areas which may be directly or indirectly disturbed, and movement of any individuals away from the impact zone.

Specific details around these are provided within the Landscape, Ecology and Ground Impact Management Plan⁸.

4.1 ECOLOGICAL ENHANCEMENTS OVERVIEW

As part of the EclA², specific actions were recommended to be implemented throughout the park to address species receptors to impacts from the events proposals at the site. A summary of these actions are following:

- Installation of at least 50 bat boxes, including at least 5 large maternity boxes;
- Installation of at least 50 bird boxes, with varied entrance hole shape and sizes to attract varied species;
- Creation of at least 5 large brash piles;
- Creation of herpetofauna hibernacula throughout the park, with at least 20 log piles and 5 hibernacula created;
- Installation of five invertebrate hotels;
- Commitment to a monitoring regime whereby species outcomes would be assessed going forward and reactive additional mitigatory or compensatory actions implemented where identified as necessary; and,
- Addition of an optional nature restoration levy for attendees or corporate sponsors to contribute towards.

Details on these features and specifications are provided in the following section. Indicative locations and directions (where applicable) are denoted in Appendix A and Appendix B.

4.2 BAT BOXES

A total of 50 no. bat boxes will be mounted on trees at the park. The recommended bat boxes would provide a mix of maternity, hibernation and general purpose roosting features for bats. Whilst Greengage does not endorse any specific products, it is recommended that a mixture of Schwegler bat boxes (or suitable alternatives) are used to support a variety of bat species and roosting types (i.e. summer roosting, maternity roosting, and hibernation/winter roosting), with species targeted in particular which were recorded within the phase 2 ecology bat surveys detailed within the EclA², as shown in Plate 4.1. Recommended suitable bat box products include:

- 10 no. 2F Schwegler Bat Box (General Purpose);
- 10no. 1FW Schwegler Bat Hibernation Box;
- 10 no. 1FF Schwegler Bat Box with Built-in Wooden Rear Panel;
- 10 no. 2FN Schwegler Bat Box; and,
- 10 no. 1FD Schwegler Bat Box.

The bat boxes will be installed away from artificial light sources or direct illumination from streetlights or windows (to protect them from predation and disturbance); and sheltered from strong winds and exposed to the sun for part of the day, such as **south and western aspects**, ideally overlooking potential foraging areas.

Bat boxes will be **mounted on trees that are mature and of at least 60cm diameter at breast height (DBH)** to support the boxes. They will be sited at **height of 2-6m above ground level**, dependent on specific product installation details. Indicative locations and direction facings are provided in Figure A.1.

Plate 4.1 Example bat box products (top left - 2F Schwegler Bat Box (General Purpose), top middle - 1FW Schwegler Bat Hibernation Box, top right - 1FF Schwegler Bat Box with Built-in Wooden Rear Panel, bottom left - 2FN Schwegler Bat Box, bottom right - 1FD Schwegler Bat Box)



4.3 BIRD BOXES

A total of 50 no. bird boxes will be mounted on trees at the park or on buildings. This will include a mixture of types to support a diversity of bird species. Based on local desk study records in the Greengage (2025) Preliminary Ecological Appraisal¹ and Lambeth and London BAP species, targeted bird species (that will nest in bird boxes) include; swift, house martin *Delichon urbica*, pied flycatcher *Ficedula hypoleuca*, house sparrow, dunnock *Prunella modularis*, tawny owl *Strix aluco*, and starling *Sturnus vulgaris*. Through the provision of a range of bird box types, this enhancement will also aim to attract a range of other bird species to the park.

Whilst Greengage does not endorse any specific products, a variety of box types to support the above species is recommended. The following box types would support the above targeted bird species, amongst others, as shown at Plate 4.2:

- 3 no. Woodstone® Swift façade nest box sited in a group on the eaves of one building at a minimum of 5m height above ground, suitable for swifts;
- 3 no. 9A Schwegler House Martin Nest sited in a group under the eaves of external walls of one building at a minimum of 2m height above ground, suitable for house martin;

- 10 no. Vivara Pro Barcelona WoodStone® Open Nest Box, suitable for wrens *Troglodytes troglodytes*, robins *Erithacus rubecula*, song thrushes *Turdus philomelos* and blackbirds *Turdus merula*;
- 10 no. Vivara Pro WoodStone® Starling Nest Box, suitable for starlings;
- 5 no. 2M Schwegler Nest Box (32mm hole) suitable for a range of bird species such as great tit *Parus major*, blue tit *Cyanistes caeruleus*, marsh tit *Poecile palustris*, coal tit *Periparus ater*, crested tit *Lophophanes cristatus*, redstart *Phoenicurus phoenicurus*, nuthatch *Sitta europaea*, pied flycatcher, tree sparrow *Passer montanus* and house sparrows, and occasionally bats.
- 3 no. Vivara Pro Treecreeper Nest Box suitable for treecreepers *Certhia familiaris*;
- 5 no. Round Nest Box-Oval (32mm entrance) suitable for house sparrows, redstarts, tree sparrows and great tits;
- 10 no. Vivara Pro Seville 28mm WoodStone® Nest Box suitable for blue tits, tree sparrows, great tits, crested tits, coal tits and pied flycatchers; and
- 1 no. Tawny owl nest box as high as possible in a suitable tree, ideally 5-8m above ground⁹.

Bird boxes will be on **suitable trees that are mature** and of at least **60cm diameter at breast height (DBH)** (or buildings where specified above) at approximately **2m above ground** dependent on specific product installation details. They will be placed in **locations that are sheltered from strong winds and ideally overlooking other vegetation** and on **north or east facing aspects**. Indicative locations and direction facings are provided in Figure A.1.

Plate 4.2 Example bird boxes (top left - Woodstone Swift facade nest box, top middle - 9a Schwegler house martin nest, top right - Vivara Pro Barcelona WoodStone® Open Nest Box, middle left - Vivara Pro WoodStone® Starling Nest Box, middle middle - 2M Schwegler Nest Box, middle right - Vivara Pro Treecreeper Nest Box, bottom left - Round Nest Box-Oval (32mm entrance), bottom middle - Vivara Pro Seville 28mm WoodStone® Nest Box, bottom right - Tawny Owl Nest Box).





4.4 BRASH PILES

The creation of brash piles will follow guidance set out in the Amphibian and Reptile Conservation: Reptile Habitat Management Handbook¹⁰. A total of 5 no. brash piles will be incorporated across the park. Indicative locations are provided in Figure A.1 and an example is shown at Plate 4.3.

Brash will be created using arisings from scrub control management that likely already occurs across the park. Brash piles will be placed in sunny locations, set in proximity to existing areas of denser vegetation. A diverse structure to the brash pile will be created, with the central core of the brash pile compacted and outer vegetation loosely layered on top. Vegetation will be allowed to grow through the brash pile to provide another layer of structure. The brash piles will be maintained over time by adding additional material as the brash pile decomposes over time, which can be provided from ongoing arisings from scrub and vegetation management activity.

Brash piles will be located away from the highest activity at the park to reduce the risk of disturbance and damage. Brash piles will be partially buried in the ground, or anchored with wire or secured with wire stapled to larger logs.

Plate 4.3 Example brash pile



4.5 HIBERNACULA

As with brash piles, hibernacula will be created following guidance set out in the Amphibian and Reptile Conservation: Reptile Habitat Management Handbook¹⁰. A total of 5 no. hibernacula will be incorporated across the park. Indicative locations are provided in Figure A.1 and an example is shown at Plate 4.4.

The location selection of hibernacula creation will ensure:

- Soils are free-draining, sandy or loose soils;
- Areas are not prone to flooding or shading;
- Groundwater conditions suitable for maintaining natural soil moisture; and
- Sitings within tall or tussocky grassland.

Ground preparation will be undertaken initially, which will include:

- Scraping back turf or compacted topsoil (approx. 50–120 mm) until slightly damp mineral soil is exposed; and
- Ensuring underlying soil retains natural moisture and capillary structure.

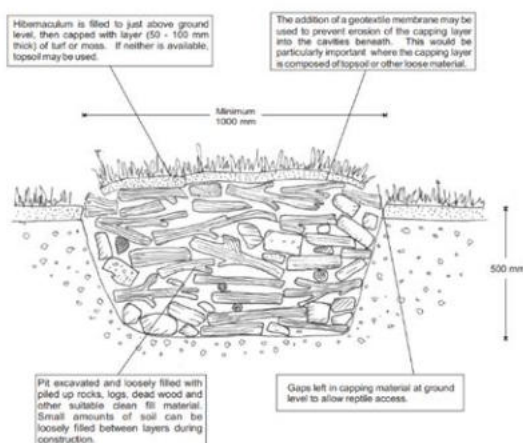
Hibernacula construction will include:

- A pit will be dug to a depth of 0.5 m;
- Materials will be dug into a pit allowing for the materials to be partially buried and gravel placed at the bottom to allow for drainage and hibernacula will be created with cavities 40–60 cm deep, incorporating 10–20 cm internal spaces using broken concrete, rocks, bricks, brash, cut timber, or tree roots and filled in with looser substrate such as wood chippings, loose topsoil and/or sand;
- To avoid collapse, organic material will not be placed under heavy components such as bricks or rocks;
- Sizings of the hibernacula will be a minimum of 4 m long, 2 m wide and 1 m high above ground level.

Plate 4.4 Example hibernacula

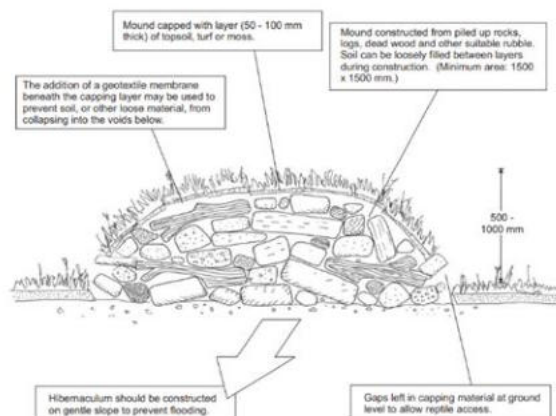
Hibernaculum on free-draining ground

Where ground conditions allow, the hibernaculum should be incorporated into a shallow pit. This design is more likely to remain frost-free, and will be less obtrusive and thus unlikely to be subject to interference.



Hibernaculum on impermeable ground

Where ground conditions are impermeable, then an 'above-ground' or mounded design should be utilised in order to prevent the hibernaculum from flooding. This design should also be used if it is not possible to excavate a pit for any other reason.





4.6 LOG PILES

A total 20 no. log piles will be created across the park, with indicative locations shown in Figure A.1. Wood from broadleaved trees such as oak and beech, and from fruiting trees such as apple and pear will be used, where possible. Log sizes will range from ~10cm up to ~60cm diameter with approximately one third of the logs buried. Logs will be placed horizontally and longitudinally to provide a pyramid style shape. Some logs will also be sited upright, with a height of up to 1-1.5m protruding from the ground.

Log piles provide excellent breeding habitat for stag beetles, a UK BAP species, as well as other saprophytic invertebrates which thrive on dead and decaying wood. Logs in contact with the substrate will remain damp underneath, which is vital for many invertebrates such as woodlice.

An example of a log pile is provided in Plate 4.5 below.

Plate 4.5 Example log pile



4.7 INVERTEBRATE HOTELS

Five invertebrate hotels will be positioned across the park, with indicative locations and directions shown in Figure A.1. These will be positioned in a **sheltered area** out of the wind at least 1.5 m to 2.5 m off the **ground**. They will be **south/south-east facing, overlooking nectar rich plants** within the landscaping, with vegetation not covering the front of them. Whilst Greengage does not endorse any specific products, an example is shown in Plate 4.6 below.

Plate 4.6 Examples of invertebrate hotels



4.8 INFORMATION BOARDS

All above ecological enhancement features act as both a means of increasing biodiversity and ecosystem services, as well as acting as educational focal points. Therefore, it is recommended that information boards containing QR codes, directing site users to further information, are positioned near to features, to inform visitors and reduce disturbance. It would also provide opportunity for visitor engagement and interaction with their natural environment. An example of an information board layout is shown in Plate 4.7.

Plate 4.7 Example of what could be included within an information board

Winter

In late winter, food sources such as alder catkins onsite are vital for early emerging bumblebees like the buff-tailed (below).

Image by [Tessa Davidson](#) from [iStock](#)

Spring

Hoverflies are excellent pollinators visiting open flowers such as the oxeye daisy onsite (below).

Image by [Jill Whitehead](#) via [iStock](#) from [iStock](#)

Summer

Plants like this common knapweed onsite can provide an excellent food source for butterflies such as the meadow brown.

Image by [Eun From](#) from [iStock](#)

Autumn

Once pollinated by insects attracted over spring and summer to their flowers, trees such as the rowan onsite provide berries for birds like the fieldfare (below).

Image by [Robyn Jacobs](#) from [iStock](#)

Homes for nature!

Planting has been designed to create food for our wildlife and give them safe corridors through the site. Alongside this, a range of homes have been included, so the wildlife has both bed and breakfast! Mounted on trees or poles there are a variety of boxes for birds (below middle) and bats, and bees even get their own high-rise apartments (below right)! Can you spot them and who is using them?

QR code for Brockwell Live

Bee quick and scan me!

What Brockwell Live is doing to support nature all year round!

4.9 ACOUSTIC MONITORING REGIME

Bird and bat populations across the site and the park will be monitored using an acoustic device that captures bird and bat calls to track species presence and activity patterns over time.

Birds play a critical role in ecosystems as pollinators, seed dispersers, and indicators of habitat quality, and monitoring their populations can provide a clear view of the longer term impacts of events and the success of ecological enhancements.

Bats are vital indicators of environmental health due to their sensitivity to changes in habitat quality, lighting, and food availability. Monitoring their activity can reveal the success of the enhancement features in creating a habitat that supports feeding and commuting behaviours. By comparing the bat acoustic data to the 2025 baselines, we can assess whether the site has positively impacted bat diversity and activity, providing valuable insights into the ecological impact of the events at the site.

Four indicative locations have been identified for acoustic monitoring based on previous automated static monitoring of bats that was undertaken as part of the EcIA². An additional two locations will also be monitored, these will be located around enhancement features, as shown in Figure B.1. A 50m radius has been applied to each location to indicate the average radius that recordings will be captured from in each location. A single static monitoring device will be deployed in each location.

This static monitoring device will be deployed for one year between April 2026 to April 2027. The static monitoring devices will record data for birds and bats. Recording for birds will be continuous through day and night* with an active recording cycle of 5 minutes recording every 20 minutes. Recording for bats will be set for five suitable nights per month selected automatically based on suitable weather conditions and will record 30 minutes before dusk to dawn.

*During the recording for bats, the bird recording will be paused to allow for a single recording channel.

These methods will yield internal technical indicators, such as the activity and diversity of birds and bats, and should be used to inform future habitat management and recommendations for any future acoustic monitoring at the park, and be used to assess future impacts of events at the park against the 2025 baseline levels².

The monitoring data collected should be used to create interactive engagement points. Bird watching and hearing bird song both provide contact with nature, and the data collected can support marketing and communications about the access to nature.

4.10 OPTIONAL: ADDITIONAL NATURE RESTORATION LEVY

In addition to those nature improvements stated above, an 'optional additional nature restoration levy' where funds raised would be allocated to additional ecology enhancements decided by Lambeth Parks and influenced by the annual monitoring report. This would be funds that are directed solely into addressing the immeasurable impacts of running events at the park, including the embodied nature loss of the associated energy expenditure and commodity consumption that occurs annually.

4.11 REPORTING

An annual monitoring report will be produced for the first five years post-installation of all ecological features. Following the first five years, a monitoring report will be produced every five years for a period of 30 years (aligning with the Habitat Management and Monitoring Plan (HMMP) requirements for

BNG associated with the events). This will include a summary of occupancy rates and remedial actions undertaken.

Additionally, a five-year review will be undertaken of this EEP following results and remedial actions outlined within the annual monitoring reports.

5.0 INSTALLATION, MAINTENANCE AND MONITORING PLAN

This section provides an overview of relevant general maintenance and monitoring actions of the ecological enhancement features at the park.

The maintenance and monitoring plan will follow a clearly defined initial five-year timetable that will be used as a reference point for site management, maintenance, monitoring and any future enhancement works that may be necessary, as detailed in Table 5.1 below.

Although this covers the initial five-year period, this should be an iterative plan that is reviewed at regular intervals and updated at the end of year five to ensure the long-term legacy of the enhancements.

5.1 ECOLOGICAL CONSTRAINTS TO MAINTENANCE AND MONITORING

The features to be implemented on-site, specifically bird and bat boxes, will provide potential to support nesting birds and roosting bats. Relevant legislation regarding the protection of nesting birds and bats is located in Appendix C.

To avoid disturbing, harming or killing any nesting birds or their young, any maintenance and management of these ecological enhancement features will take place outside of the peak breeding bird season (i.e. outside of March to August inclusive). If this is not possible an inspection for nesting birds must take place, by an SQE prior to any works taking place.

To avoid the disturbance of roosting bats, any maintenance and management of bat boxes will only be undertaken by a bat licenced ecologist or after a bat licenced ecologist has confirmed roosting bats to be absent. Works to the bat boxes will be undertaken outside of the maternity season (June - August inclusive) and avoid the winter months (October - March) when bats may be in hibernation.

5.2 MONITORING AND REVIEW PROCEDURES

Habitats are dynamic, and the species composition is anticipated to change over time, owing to prevailing climatic conditions, natural colonisation, and succession. As a result, it is necessary to ensure a feedback process is in place to ensure the long-term ecological success of the implemented ecological enhancements.

It is recommended for a SQE to undertake an annual monitoring survey for an initial 5-year period. It is recommended that a monitoring survey is conducted every five years thereafter, across a 30-year lifespan. During these surveys, the SQE will observe indicators of success and deficiency in the habitats, and habitat features, on site. The SQE will then make any remedial recommendations accordingly.

Indicators of success include:

- Little to no evidence of littering;
- Evidence of bat activity, particularly London BAP species, foraging on site and using the bat boxes;

- Evidence of invertebrates inhabiting invertebrate hotels;
- Evidence of bird activity, particularly targeted bird species, foraging on site/the park and using the bird boxes;
- Evidence of reptiles and other fauna inhabiting the brash piles, hibernacula and log piles, and foraging and basking on site/the park;
- Increase in bird and bat diversity and activity levels at the site/park through the use of acoustic monitoring and compared to baseline levels; and
- Utilisation of information boards and the QR codes to show the public's interaction with nature and understanding of the ecological enhancement features at the park.

Indicators of deficiency include:

- Evidence of excessive littering;
- No evidence of invertebrates/reptiles using intended ecological enhancement features;
- No evidence of bird or bat activity associated with the bird and bat boxes.

At or just after installation of the ecological enhancement features at the park, an SQE should inspect the ecological enhancements features implemented as outlined within this EEP.

5.3 ROLES AND RESPONSIBILITIES

Maintenance

Maintenance of all ecological enhancement features should be the responsibility of Brockwell Live and their contractors.

London Borough of Lambeth and/or Lambeth Parks should keep a record of all maintenance of the ecological enhancement features carried out internally or by a third party. This would usually be keeping their own log of the monitoring reports and maintenance carried out in accordance with that.

Monitoring

The park management team will be responsible for monitoring the success of the ecological features installed on site.

Records of monitoring will be kept by Brockwell Live, SQE and local planning authority (LPA) ecologist (where relevant) with an annual monitoring report produced by the SQE/person that undertook the monitoring, including a summary of occupancy rates and remedial actions undertaken.

Table 5.1 Installation, Maintenance and Monitoring Plan - initial five years

Year and Season	Installation, Maintenance and Monitoring Plan	Roles and Responsibility
Year 1 - Spring	Acoustic monitoring actions	
	Design and finalise an acoustic monitoring regime for the park	Brockwell Live and SQE
	Deploy static monitoring detectors in finalised locations	Brockwell Live
	Design data upload and analysis programme	Brockwell Live and SQE
Year 1 - Summer	Creation and installation of ecological enhancement features (within 6 months of events de-rig)	
	- Creation and installation of all ecological enhancement features including; - Erection of 50 bat boxes; - Erection of 50 bird boxes, with varied entrance hole shape and sizes to attract varied species; - Creation of 5 large brash piles; - Installation of 5 invertebrate hotels; - Placement of herpetofauna hibernacula throughout the park, including 20 log piles and 5 hibernacula; - Acoustic monitoring regime whereby species outcomes would be assessed going forward and reactive additional mitigatory or compensatory actions implemented where identified as necessary; and, - Addition of an optional nature restoration levy for attendees or corporate sponsors to contribute towards.	Brockwell Live
	General monitoring actions	
	Annual monitoring programme to commence	Brockwell Live and SQE
	Single site visit to be conducted by a Suitably Qualified Ecologist (SQE) between May and August to ensure ecological enhancement features have been installed appropriately	SQE

Year and Season	Installation, Maintenance and Monitoring Plan	Roles and Responsibility
	Acoustic monitoring actions	
	Commence acoustic monitoring regime	Brockwell Live and SQE
	Monthly checks to ensure static monitoring devices remain intact and in working order and continue replacement of batteries/memory cards where required as per the acoustic monitoring regime	Brockwell Live
	Repair/replace any static monitoring devices that are not in working order	Brockwell Live
Year 1 to 5 - Autumn/winter	General monitoring actions	
	Check ecological enhancement features are intact (from the ground level/non-intrusively) and inspect for signs of occupancy. Bat boxes should be checked by an ecologist who holds a Natural England licence for bats. Survey for signs that invertebrates are inhabiting enhancement features and other fauna are using the site for foraging, nesting or perching.	Brockwell Live and SQE
	An annual monitoring report will be created to include a summary of occupancy rates, remedial actions undertaken and consideration of future acoustic monitoring regime.	SQE
	Maintenance actions	
	Cleaning of bird boxes where necessary (as indicated by a suitably experienced ornithologist)	Brockwell Live and SQE
	Maintain/repair/replace ecological enhancement features as necessary should monitoring indicate disrepair or damage	Brockwell Live
	Acoustic monitoring actions (dependent on previous year's monitoring report)	
	Continue acoustic monitoring regime following recommendations in previous year's monitoring report	Brockwell Live and SQE

Year and Season	Installation, Maintenance and Monitoring Plan	Roles and Responsibility
	Conduct checks to ensure static monitoring devices remain intact and in working order and continue replacement of batteries/memory cards where required as per the acoustic monitoring regime. Frequency and timing of checks dependent on acoustic monitoring regime design.	Brockwell Live
	Repair/replace any static monitoring devices that are not in working order. Frequency and timing of checks dependent on acoustic monitoring regime design.	Brockwell Live
Year 2 - Spring	Acoustic monitoring actions	
	Re-assess acoustic monitoring regime for future annual use	Brockwell Live and SQE
	Re-assess static monitoring locations as per acoustic monitoring regime (remove/return static monitoring devices from the park where necessary)	Brockwell Live
	Annual reporting/analysis of acoustic monitoring regime	SQE
Year 3 to 5 - Summer	General monitoring actions	
	Check ecological enhancement features are intact (from the ground level/non-intrusively) and inspect for signs of occupancy. Bat boxes should be checked by an ecologist who holds a Natural England licence for bats. Bird boxes should only be inspected outside of the breeding bird season (September to February inclusive) or by a suitably experienced ornithologist to ensure disturbance is avoided/minimised to breeding birds. Survey for signs that invertebrates are inhabiting enhancement features and other fauna are using the site for foraging, nesting or perching	Brockwell Live and SQE
	Maintenance actions	
	Maintain brash piles, hibernacula and log piles by ensuring the vegetation is intact and replace any vegetation where it has decomposed. Ensure natural cavities are appropriate for use i.e. large enough for access for reptiles but small enough to limit access by predators such as rats	Brockwell Live

Year and Season	Installation, Maintenance and Monitoring Plan	Roles and Responsibility
On-going management actions every five years from year 5	General monitoring actions	
	Every five years, a site visit to be conducted by SQE between May and August	SQE
	Check ecological enhancement features are intact (from the ground level/non-intrusively) and inspect for signs of occupancy. Bat boxes should be checked by an ecologist who holds a Natural England licence for bats. Bird boxes should only be inspected outside of the breeding bird season (September to February inclusive) or by a suitably experienced ornithologist to ensure disturbance is avoided/minimised to breeding birds. Survey for signs that invertebrates are inhabiting enhancement features and other fauna are using the site for foraging, nesting or perching	Brockwell Live and SQE
	Maintenance actions	
	Maintain brash piles, hibernacula and log piles by ensuring the vegetation is intact and replace any vegetation where it has decomposed. Ensure natural cavities are appropriate for use i.e. large enough for access for reptiles but small enough to limit access by predators such as rats	Brockwell Live
	Reporting procedure	
	Monitoring programme report produced annually for the first three years and then every 3 years.	Brockwell Live and SQE
	Review of the effectiveness and validity of monitoring programme every five years. Update and amend the EEP in line with findings from the SQE site visit.	Brockwell Live and SQE
	Remedial actions	
	As identified by monitoring reports	Brockwell Live

APPENDIX A ECOLOGICAL ENHANCEMENT FEATURES PLAN

Figure A.1 *Ecological Enhancement Features Plan*

BROCKWELL LIVE 2026

- Site Boundary
- Park Boundary
- + Hibernacula
- ✱ Log piles
- Brash piles
- ★ Invertebrate hotels
- ↑↓
- Bat boxes**
 - ▶ 2F Schwegler Bat Box
 - ▶ 1FW Schwegler Bat Hibernation Box
 - ▶ 1FF Schwegler Bat Box with Built-in Wooden Rear Panel
 - ▶ 2FN Schwegler Bat Box
 - ▶ 1FD Schwegler Bat Box
- Bird boxes**
 - Vivara Pro Woodstone Starling Nest Box
 - Tawny Owl Nest Box
 - Vivara Pro Barcelona Woodstone Open Nest Box
 - 2M Schwegler Nest Box (32mm hole)
 - Vivara Pro Treecreeper Nest Box
 - Round Nest Box - oval
 - Vivara Pro Seville 28mm Woodstone Nest Box
 - Woodstone Swift Facade Nest Box
 - 9A Schwegler House Martin Nest

Title: Figure A.1 Ecological Enhancement Features

Drawn by: CP
Date: 10/03/2026

Reviewed by: SB
Date: 10/03/2026

Project number: 553795
Sources: Google Satellite Hybrid



APPENDIX B ACOUSTIC MONITORING LOCATIONS

Figure B.1 Acoustic monitoring locations

BROCKWELL LIVE 2026

- Site boundary
- Brockwell Park Boundary
- Acoustic Monitoring Locations
- Acoustic Monitoring Locations + 50m buffer



Title: Figure B.1 Acoustic Monitoring Locations

Drawn by: CP
Date: 10/03/2026

Reviewed by: SB
Date: 10/03/2026

Project number: 553795
Sources: Google Satellite Hybrid

APPENDIX C RELEVANT LEGISLATION AND POLICY

C.1 LEGISLATION

Current key legislation relating to ecology includes the Environment Act 2021¹¹, Wildlife and Countryside Act 1981 (as amended)¹²; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')¹³, The Countryside and Rights of Way Act 2000 (CRoW Act)¹⁴, and The Natural Environment and Rural Communities Act, 2006¹⁵.

The Environment Act, 2021

Under the Environment Act¹⁶, 2021, as of 12th February 2024 and 2nd April 2024, it is mandatory in England for new developments (with a small number of exceptions) to deliver a minimum 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric (SSM) respectively, secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of off-site compensation, or the purchase of statutory credits.

The Act introduces the condition that no development may begin unless a Biodiversity Gain Plan (BGP) has been submitted and approved by the LPA.

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

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

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

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)¹⁷, and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')¹⁸, and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')¹⁹ into UK law (in conjunction with the Wildlife and Countryside Act).

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

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

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

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

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

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats²⁰ (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

The Countryside and Rights of Way Act 2000

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

The Natural Environment and Rural Communities Act 2006

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

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (*Erinaceus europaeus*), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan²¹ (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework²² (and Biodiversity 2020 strategy²³ in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020 and EU Biodiversity Strategy (EUBS)²⁴, this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural

Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

Biodiversity Action Plans

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

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

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

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

European Commission Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive'), and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive') form the cornerstones of nature conservation legislation across EU member states. Priority species requiring protection across Europe are listed in the Annexes of these Directives. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2019 and Offshore Marine Conservation Regulations, 2007 (as amended) transpose these directives into UK law and set the basis for the designations of protected sites (known as Natura 2000 sites; Special Areas of Conservation under the Habitat Directive and Special Areas of Protection under the Birds Directive) that are of importance for habitats, species or assemblages listed on the directive Annexes. In the UK Ramsar sites are also offered the same level of protection as SPAs and SACs however the qualifying species for the designation may differ; Ramsar sites being designated specifically as important wetland habitats.

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

Legislation Relating to Amphibians

Great crested newts are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Protection to the species is also afforded by Regulation 43 of the Conservation of Habitats and Species Regulations 2019, making the great crested newt a European Protected Species. These two pieces of legislation operate in parallel, although there are some small differences in scope and wording. Under the provisions of Section 9 of the Wildlife & Countryside Act, it is an offence to:

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

Regulation 43 of the Conservation of Habitats and Species Regulations 2019 makes it an offence to:

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

Legislation Relating to Bats

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

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

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

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

All eighteen British bat species are listed in Schedule 5 of the Wildlife and Countryside Act, 1981 and under Annexe IV of the Habitats Directive, 1992 as a European protected species. They are therefore fully protected under Section 9 of the 1981 Act and under Regulation 43 of the Conservation of Habitats and Species Regulations 2019, which transposes the Habitats Directive into UK law.

Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);

- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; and
- Intentionally or recklessly obstruct access to a bat roost.

Legislation Relating to Birds (Nesting)

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

Legislation Relating to Reptiles

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

Sand lizards and smooth snakes are European protected species and are afforded full protection under Section 9 of the Wildlife and Countryside Act 1981 and Regulation 43 of the Conservation of Habitats and Species Regulations 2019. However, these species are rare and highly localised. Their occurrence is not considered as relevant in this instance, as the ranges and specialist habitats of these species do not occur at this site.

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

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

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

Legislation Relating to Invasive Non-native Species

Section 14 of the Wildlife and Countryside Act 1981 (as amended) prevents the release into the wild of certain plants and animals which may cause ecological, environmental or socio-economic harm. It prohibits the introduction into the wild of any animal of a kind which is not ordinarily resident in, and is not a regular visitor to, Great Britain in a wild state, or any species of animal or plant listed on Schedule

9 of the Act. In the main, Schedule 9 lists non-native species that are already established in the wild, but which continue to pose a conservation threat to native biodiversity and habitats, such that further releases should be regulated. The Schedule also includes some native species (for example barn owl) in order to provide a level of control to ensure that releases, in particular reintroduction programs, are carried out in an appropriate manner and biodiversity is properly safeguarded.

C.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2024²⁵ sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

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

Regional

The London Plan²⁶

Policy G1 Green infrastructure

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

Policy G5 Urban greening

5. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
6. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. (excluding B2 and B8 uses).
7. Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

Policy G6 Biodiversity and access to nature

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

11. Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
12. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

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

London Environment Strategy 2018²⁷

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

Objective 5.1 Make more than half of London green by 2050

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

This policy states:

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

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

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

Objective 5.2 conserving and enhancement wildlife and natural habitats

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

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

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

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Policy EN1: Open space, green infrastructure and biodiversity

The council will meet requirements for open space and green infrastructure by:

16. Protecting and maintaining open spaces, green infrastructure and their function. Development which would involve the loss of existing public or private open space will not be permitted unless at least one of the following tests is met:
 - a. Replacement open space of equivalent or better quality and quantity is provided within a suitable location in the local area.
 - b. In the case of housing estate amenity areas, significant regeneration and community benefits would be achieved that could not be achieved in any other way, and appropriate compensatory provision for the loss of open space is made, including improvements to the quality of the remaining open space.
 - c. It is for the provision of facilities directly related to the use of open space including ecology centres, indoor sports facilities, changing rooms, toilets or cafes as long as these are appropriate in scale and form to the size and character of the open space and acceptable in terms of impact on openness and do not harm the function and operation of the open space.
17. Preventing development which would result in loss, reduction in area or significant harm to the nature conservation or biodiversity value of an open space including any designated or proposed Local Nature Reserves (LNR) or Sites of Importance for Nature Conservation (SINC) unless adequate mitigation or compensatory measures of equivalent or better biodiversity value are included, appropriate to the nature conservation value of the assets involved. In the case of SINCs, the mitigation hierarchy in London Plan policy G6 C will apply.
18. In accordance with London Plan policy G6, development proposals should wherever possible protect, enhance, create or manage nature conservation and biodiversity interest in accordance with the borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy.

19. Increasing the quantity of open space and green infrastructure in the borough through proposals such as the Vauxhall Square initiative, the ^a To table of contents 159 Lambeth Local Plan 2020–2035 | Section 9: Environment and Green Infrastructure extension of Jubilee Gardens and by linking existing spaces through green chains, the Greenway and Thames Path National Walking trail initiatives, but also through:
 - a. The provision of open space in new developments appropriate to their scale, the uses involved and the location of the development.
 - b. Requiring major development in areas of open space deficiency and/ or in areas of access to nature deficiency to provide new on-site open space/access to nature improvements. Where the development proposal includes residential units, this new open space should be in addition to the external amenity space requirements in Local Plan policy H5. Where it is demonstrated to the satisfaction of the council that new on-site open space provision or access to nature improvements would not be feasible and/or effective, a payment in lieu will be sought as a planning obligation to enable the provision of new open space or improvements to the accessibility of existing public open space in the vicinity of the development, including their nature conservation and biodiversity value. Planning obligations will also be sought towards management and maintenance of new or improved open space.
 - c. Where appropriate and feasible, ensuring that development is designed so as to contribute to the creation or extension of green chains and links ('green corridors') involving safe, healthy, convenient and attractive access for pedestrians and cyclists and to promote migration and protection of plants, animals and habitats of biodiversity importance.
20. Improving the quality of, and access to, existing open space and green infrastructure, including the range of facilities available and its biodiversity and nature conservation value and heritage value, through various means including the implementation of the Lambeth Open Spaces Strategy and Lambeth Green Infrastructure Strategy. F. Applying London Plan policy G5 in relation to the urban greening factor for major developments. For other developments the council will strongly encourage inclusion of urban greening measures. Development proposals should incorporate living roofs and walls where feasible and appropriate to the character and context of the development. All proposals should include a maintenance plan for the lifetime of the development. Planning obligations may be sought to cover future maintenance of green infrastructure.

REFERENCES

- ¹ Greengage Environmental Ltd (2025) Preliminary Ecological Appraisal. Report ref: 553185sb09May25FV01_PEA, dated May 2025.
- ² Greengage Environmental Ltd (2025) Ecological Impact Assessment. Report ref: 553185mt07Nov25FV02_EcIA.
- ³ Turley (2025) Planning Statement. Report ref: LONL3043.
- ⁴ UNEP (2022). Kunming-Montreal Global Biodiversity Framework to 2030. Available at <https:// Kunming-Montreal Global Biodiversity Framework | UNEP - UN Environment Programme>.
- ⁵ HM Government, (2006); Natural Environment and Rural Communities Act 2006. HMSO
- ⁶ Lambeth (no date) Lambeth Biodiversity Action Plan 2019 - 2024. Available at: https://www.lambeth.gov.uk/sites/default/files/2024-04/New%20Lambeth%20BAP%202019-24_2.pdf
- ⁷ Greenspace Information for Greater London (GiGL) (no date) London's Biodiversity Action Plan. Available at: <https://www.gigl.org.uk/about-gigl/planning-projects/londons-biodiversity-action-plan/>
- ⁸ Brockwell Live (2025) Landscape, Ecology and Ground Impact Management Plan. Brockwell Park, London Borough of Lambeth. Version 4.0.
- ⁹ British Trust for Ornithology (BTO) (n.d.) Tawny Owl Nest Box. Available at www.bto.org.
- ¹⁰ Edgar, P., Foster, J. and Baker, J. (2010). Reptile Habitat Management Handbook. Amphibian and Reptile Conservation, Bournemouth.
- ¹¹ GOV.UK., (2021). Environment Act 2021. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>
- ¹² HM Government, (1981). Part I and Part II of Wildlife and Countryside Act (as amended). HMSO.
- ¹³ HM Government, (2019). The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Statutory Instrument 2019 no. 579.
- ¹⁴ HM Government, (2000). The Countryside and Rights of Way Act. HMSO.
- ¹⁵ HM Government, (2006). Natural Environment and Rural Communities Act 2006. HMSO.
- ¹⁶ GOV.UK. (2021). Environment Act 2021. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>
- ¹⁷ HM Government, (1994). The Conservation (Natural Habitats, &c.) Regulations. HMSO.
- ¹⁸ CEC (Council of the European Communities), (1992). Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.
- ¹⁹ The European Parliament And Of The Council, (2009). Directive 2009/147/EC On The Conservation Of Wild Birds (Codified Version).
- ²⁰ CEC (Council of the European Communities), (1979). Convention on the Conservation of European Wildlife and Natural Habitats (Bern, 19.IX.1979). EC.
- ²¹ UK Biodiversity Action Plan, (2007). UKBAP Priority Species and Habitats. <https://jncc.gov.uk/our-work/uk-bap-priority-species/>
- ²² JNCC and Defra (on behalf of the Four Countries' Biodiversity Group), (2012). UK Post-2010 Biodiversity Framework. July 2012. Available from: <http://jncc.defra.gov.uk/page-6189>
- ²³ Defra, (2011). Biodiversity 2020: A strategy for England's wildlife and ecosystem services.
- ²⁴ European Commission, (2012). Our life insurance, our natural capital: an EU biodiversity strategy to 2020 European Parliament resolution of 20 April 2012 on our life insurance, our natural capital: an EU biodiversity strategy to 2020 (2011/2307(INI)).
- ²⁵ GOV.UK., (2024). National Planning Policy Framework [online] Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- ²⁶ Greater London Authority, (2021). The London Plan: The Spatial Development Strategy for Greater London (GLA).
- ²⁷ Greater London Authority, (2018). London Environment Strategy 2018. London: Greater London Authority.
- ²⁸ Lambeth Local Plan 2020-2035. Available at <https://www.lambeth.gov.uk/sites/default/files/2021-09/Lambeth%20Local%20Plan%202021.pdf>