



Brighter strategies
for greener projects



Client: London Borough of Lambeth
Project: Brockwell Park
Report: Preliminary Ecological Appraisal

QUALITY ASSURANCE

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CONTENTS

1.0	EXECUTIVE SUMMARY	1
2.0	INTRODUCTION	8
2.1	SITE DESCRIPTION	8
3.0	METHODOLOGY	10
3.1	DESK STUDY	10
3.2	SITE WALKOVER	11
3.3	SURVEYORS/COMPETENCIES	15
3.4	CONSTRAINTS	15
4.0	RESULTS	17
4.1	DESK STUDY	17
4.2	SITE WALKOVER	27
5.0	EVALUATION	33
5.1	PROPOSALS	33
5.2	DISCUSSION AND RECOMMENDATIONS	33
6.0	CONCLUSION	41
APPENDIX A LOCATION PLAN AND UKHAB MAPS		
APPENDIX B NON-STATUTORY DESIGNATED SITES		
APPENDIX C BOTANICAL SPECIES LIST		
APPENDIX D SITE PHOTOGRAPHS		
APPENDIX E RELEVANT LEGISLATION AND POLICY		
REFERENCES		

Tables

Table 1.1	Ecological Constraints and Recommendations	2
Table 1.2	Ecological Enhancement Recommendations	6
Table 4.1	Statutory and Non-Statutory Designated Sites identified within 2km Search Radius	17
Table 4.2	Summary of native amphibian records within 2km of the site	21
Table 4.3	Summary of protected/notable bird species records within 2km of the site	22
Table 4.4	Summary of protected/notable plant species records within 2km of the site	23
Table 4.5	Summary of invertebrate records within 2km of the site	24
Table 4.6	Summary of bat records within 2km of the site	26
Table 4.7	Summary of other terrestrial mammal records within 2km of the site	26
Table 4.8	Summary of reptile records within 2km of the site	27
Table B.1	Full list of non-statutory designated sites within 2km of the site	

Table C.1 Full list of species recorded during the UKHab survey

Figures

Figure A.1 Site location plan

Figure A.2 UKHab plan

Figure A.3 UKHab plan north

Figure A.4 UKHab plan east

Figure A.5 UKHab plan south

Plates

Plate D.1 Areas of mown, compacted modified grassland representative of much of the site area (left and right).

Plate D.2 Examples of longer grassland areas protected by root protection around trees (left and right)

Plate D.3 Examples of the areas of taller more species diverse sward along the southern and eastern site boundary (left and right)

Plate D.4 Some of the trees within the tree grove in the centre of the site (both)

Plate 6.1 Deadwood in the centre of the site (left), and epicormic growth that was present on several trees (right)

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Plate D.5 The evidence of compaction in the west of the site

Plate D.6 The onsite ground conditions, including aeration holes in those more compacted areas (both)

Plate D.7 The storage of event equipment within the 'boneyard' (top and bottom)

Plate D.8 The event infrastructure installed across the site (top, middle and bottom)

1.0 EXECUTIVE SUMMARY

Greengage Environmental Limited (Greengage) was commissioned by London Borough of Lambeth to undertake a Preliminary Ecological Appraisal (PEA) of an area of Brockwell Park used to host the Lambeth County Show, in London Borough of Lambeth, hereafter known as 'the site'.

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

This document is a report of the PEA and has been produced to support the discharge of conditions relating to planning application (reference: 25/00693/RG3). In particular Condition 15, which states:

"A Ecological Impact Assessment for 2025-26 shall be submitted to and approved by the local planning authority in writing prior to the 11/05/2025."

This PEA aims to establish the presence of, or potential for, designated sites and legally protected/priority habitats and species at the site or within the zone of influence (i.e. the ecological constraints), assess likely impacts based on design stage proposals/assumptions and subsequently to provide recommendations for additional targeted surveys and/or appropriate mitigation measures in accordance with the mitigation hierarchy, where applicable. Ecological enhancement recommendations have also been provided although this should be formalised once a full Ecological Impact Assessment (EcIA) has been completed following phase 2 survey works.

The site extends to 16.68 hectares (ha) and comprised modified grassland, trees, developed land, sparsely vegetated urban land and hedgerows.

This report is intended primarily to consider the impact of the Country Show, however it is necessary to be considerate of the enabling festival period which precedes the event, as well as the cumulative impact of events throughout each summer, and between subsequent years - it being impossible to disentangle impacts that may occur as a consequence of one event only. This complexity should be dealt with in more detail within a full EcIA which accounts for the schedule of events in more detail.

It should be possible to address impacts identified by this EcIA upon key receptors through mitigatory or compensatory action in the surrounding environment. Due process to identify the most appropriate actions and prescribe approaches should however be followed.

Ecological constraints and additional surveys/mitigation recommendations

Prior to a full EcIA it is possible to provide some draft recommendations for mitigatory and compensatory action, as well as recommendations for further assessments that may be required to inform said actions in detail. These recommendations are summarised below.

A universal recommendation for all receptors is for a thorough Ecological Management Plan (EMP) to be produced for the site and wider park, addressing the required mitigation, compensation and enhancements.

The phasing of approach should accordingly be:

- Undertake phase 2 surveys

- Undertake a full EcIA informed by these surveys
- Produce and implement an EMP which includes recommendations of the EcIA

The below designated sites, habitats and species have been confirmed to be present or have potential to be present/impacted upon due to suitable habitats on the site and/or provide habitat connectivity with the wider landscape. Sections 4.0 and 5.0 of the PEA report should be referred to for full details.

Table 1.1 Ecological Constraints and Recommendations

Ecological constraint	Level of suitability/confirmed presence	Additional surveys/mitigation recommendations (summary)
Non-statutory designated sites	Confirmed presence	The park, that includes the site, is a Site of Importance for Nature Conservation (SINC) and is designated for the flower beds, planted shrubbery, scattered trees, secondary woodland, semi-improved grassland, tall herbs and vegetated walls. Of these habitats, only the taller more diverse areas of grassland and scattered trees are within the site. To protect these habitats the following should be implemented: • Protective fencing should be set up around all trees and maintained throughout all phases of the events and there should be no storage within these; • Lighting should be directed away from trees and other vegetation. Where features covered by the designation are impacted, compensation should be provided through enhancement of other locations within the wider park.
Habitats: Grassland/soils	Confirmed presence	The majority of the grassland was identified as being heavily mown, with a short sward. These areas had evidence of existing heavy compaction from previous years' events, which will likely be exacerbated by the events.

		One impact of compaction will be the effect upon water storage capacity and the rate of surface water flows from the park into surrounding residential areas and road infrastructure during periods of extreme rainfall. Habitat changes/enhancements to hold water onsite, such as creation of bioswales and/or rain gardens should accordingly be considered. The areas of taller more diverse grassland should be protected from the events through installation of temporary fencing. If this is not possible then compensatory action should be undertaken elsewhere in the park. a study on soil health should be considered to clearly establish the levels of potential impact and inform remedial actions, although this is not strictly necessary for planning purposes.
Habitats: Trees and hedgerows	Confirmed presence	The trees on site have been assessed by an independent arboricultural consultant. • The trees and hedgerows should be protected throughout the events through: • The inclusion of and maintaining of fenced off RPAs throughout the event period; • Lighting should be directed away from any tree or hedgerow; • Materials and equipment should not be stored within the RPA of any tree or hedgerow.
Amphibians	Low	No further surveys are recommended. Areas of longer grass and potential refugia such as deadwood piles should

		be protected however during the event as a precaution.
Bats (foraging/ commuting)	High	Additional surveys are recommended. The proposals may stand to impact bat foraging and commuting through the reduction in value of grassland areas in the summer and through acute impacts during the event itself through lighting and noise disturbance. Surveys are however required to identify the scale of this impact. Automated static monitoring devices should be deployed monthly (May to October 2025 and April 2026) and left recording for a minimum of five consecutive nights each time. This monitoring should include periods during the event this summer. Statics should be placed in control locations as well as in key locations where acute impacts could occur.
Bats (roosting -summer/ Transitional/ hibernating)	Moderate to High	Additional preliminary roosting assessment (PRA) should be undertaken on all trees and buildings within the site, and surrounding zone of influence in the park. The PRA would also include an assessment of hibernation potential across the site. This PRA may identify the need for further emergence surveys.
Birds - breeding	High	Breeding bird surveys are recommended to understand the abundance and distribution of birds in the wider park, to understand the potential impact of the event.
Reptiles	Low	No further surveys are recommended.

		Areas of longer grass and potential refugia such as deadwood piles should however be protected during the event as a precaution.
Hedgehog (<i>Erinaceus europaeus</i>)	Low	No further surveys are recommended. Areas of longer grass and potential refugia such as deadwood piles and areas of dense shrubbery should however be protected during the event as a precaution.
Invasive non-native species (INNS)	Confirmed presence	False acacia (<i>Robinia pseudoacacia</i>), a priority 4 species, Turkey oak (<i>Quercus cerris</i>) and holm oak (<i>Quercus ilex</i>), both priority 5 species and green alkanet (<i>Pentaglottis sempervirens</i>), a priority 6 species were recorded onsite. These are at the lower end of the London Invasive Species Initiative risk categories. They are not predicted to be impacted by the events therefore no specific mitigation measures are required for these. In the longer term, these areas of INNS species should be removed and replaced with species of ecological value.
Invertebrates	High	No further surveys are recommended. However, areas within the site and wider park stand to support notable invertebrate species such as stag beetle. The events also potentially coincide with important periods for these species. Features which may be used by key species should be protected during the event and compensatory actions should be undertaken in the wider park.

Ecological enhancements

Initial views on appropriate enhancements are provided below. These should be formalised following the full EcIA and Biodiversity Net Gain Assessment (BNGA).

Table 1.2 Ecological Enhancement Recommendations

Ecological feature	Recommendations
Grassland	Grassland elsewhere in the park and in areas protected during the event should be enhanced to meet the UKHab definition for other neutral grassland, this should include a diversification exercise to provide variety of flowering species throughout the year
Trees	Planting of new and additional trees that can replace those that are failing or have been impacted by the compaction of soils.
Hedgerows	New species rich native hedgerows should be planted along the perimeter fence of the park, to provide habitat for wildlife but also provide an additional noise/light/pollution barrier between the site and the road and neighbouring areas of Lambeth.
Biodiverse planting	Large areas of diverse pollinator friendly planting along the edge of footpaths and around the park should be provided.
Bird and bat boxes	Installation of bird and bat boxes installed on retained trees throughout the park.
Log piles	Creation of log piles and refugia for reptiles, amphibians, small mammals and beetles should be created and installed within the areas of taller vegetation around the park

General recommendations

A Biodiversity Net Gain Assessment (BNGA) should consider the impact upon habitats by the 2025 events and provide recommendations which seek to achieve a minimum 10% uplift in ecological value on the 2025 habitat baseline. The BNGA should further consider the historic impact of the years of large-scale multi-event programming at the park. Actions should accordingly also compensate for the historic ecological damages incurred by past events.

In addition, a full ecosystem service assessment of the site should be conducted to understand the impact on wider environmental benefits that the park provides and allow for measurement of changes

following the adoption of all ecological mitigation, compensation and enhancement actions. This should also consider the social value that is derived from the site hosting the events.

N.B. For guidance on the validity of reports/surveys, the CIEEM Advice Note 'On The Ecological Lifespan Of Ecological Reports and Surveys'¹ should be referred to. In summary, most reports/surveys are likely to be considered valid within 12 months of their undertaking. Within 12-18 months, also still likely to be valid but with some exceptions (refer to CIEEM Advice Note for details). Reports/surveys that are between 18 months and 3 years old are likely to require updating and reports/surveys that are more than 3 years old are unlikely to be considered valid and will need to be updated (subject to an assessment by a professional ecologist). This report/survey has been undertaken in May 2025.

Soils

The impacts of compaction on soils could be measured as part of wider informed management actions for the site and the park that could feed into a more detailed long term risk assessment relating to the impact of sustained compaction on soils and their ability to assist in limiting risks from future extreme climate events. This could be a longer term objectives and is not strictly considered necessary for planning purposes.

A note on natural capital

Fundamentally, the park constitutes a stock of natural capital, owned by the council and managed for the benefit of the community. Events will inevitably degrade that stock. This degradation is however 'externalised' meaning it is not associated with typical flows of financial capital. Degradation can therefore occur without being appropriately conceptualised, measured and addressed.

A 'just' approach to strategy creation for this year's events and for future years could accordingly be to 'internalise' the natural capital through considering the holistic onward impact on the environment (and factoring in historic losses) and ensuring that appropriate compensation to enhance stocks elsewhere in the park or surrounding areas is undertaken. Such an approach could form a win-win for nature and people. It is accordingly recommended that such logic is followed to develop a compensation strategy for this year's events and a broader long-term strategy for future years. This can simply be achieved through relating predicted changes in biodiversity to changes in ecosystem service flows (i.e. the tangible benefits that nature provides to humanity). As with soils, this is not strictly a planning requirement, however should be considered as part of longer term objectives.

2.0 INTRODUCTION

Greengage Environmental Limited (Greengage) was commissioned by London Borough of Lambeth to undertake a Preliminary Ecological Appraisal (PEA) of an area of Brockwell Park used to host the Lambeth County Show, in London Borough of Lambeth, hereafter known as 'the site'.

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

This document is a report of the PEA and has been produced to support the discharge of conditions relating to planning application (reference: 25/00693/RG3). The application is for:

"Temporary use of Brockwell Park for Lambeth Country Show event taking place in 2025 for a total of 17 Event Days, involving the installation and de-installation of temporary infrastructure including fencing, lighting, Public Address (PA) systems, stages, fun fair rides and other temporary structures and ancillary works"

In particular the PEA has been completed in relation to Condition 15, which states:

"A Ecological Impact Assessment for 2025-26 shall be submitted to and approved by the local planning authority in writing prior to the 11/05/2025."

This PEA aims to establish the presence of, or potential for, designated sites and legally protected/priority habitats and species at the site or within the zone of influence i.e. the ecological constraints.

It then assesses likely impacts on the ecological constraints based on the layout of the site for events and subsequently provides recommendations for additional targeted surveys and/or appropriate mitigation measures in accordance with the mitigation hierarchy, where applicable. Ecological enhancement recommendations have also been provided.

This report is intended primarily to consider the impact of the Country Show, however it is necessary to be considerate of the enabling festival period which precedes the event, as well as the cumulative impact of events throughout each summer, and between subsequent years- it being impossible to disentangle impacts that may occur as a consequence of one event only. This complexity should be dealt with in more detail within a full EclA.

2.1 SITE 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 comprises three distinct parcels, the main Lambeth Country Show site, the 'boneyard' and the vendors parking. The site takes up approximately a third of the park as is shown on the plan at Appendix A.

The site is comprised predominantly of modified grassland, individual trees, hedgerows, buildings and sealed surfaces. With areas of meadow, ponds, other buildings and further modified grassland and trees found within the wider 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.

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 2km of the site.

3.0 METHODOLOGY

The PEA was undertaken in accordance with guidance in the UK Habitat Classification System (UKHab)² Version 2 and the Chartered Institute of Ecological and Environmental Management (CIEEM) (2017) Guidelines for Preliminary Ecological Appraisal³, in accordance with British Standard (BS) 2020:2013: Biodiversity⁴. The overall assessment consisted of:

- A desk study to collate site specific biological information gained from statutory and non-statutory consultation; and,
- A site walkover comprising UKHab survey and scoping assessment to record and assess protected/priority habitats and species.

3.1 DESK STUDY

Environmental databases

A review of readily available ecological information and other relevant environmental databases (including the Multi-Agency Geographic Information for the Countryside (MAGIC) website⁵) was undertaken for the site and a radius of 2 kilometres (km) from the site boundary, to search for statutory designated sites at the local to international level.

A review of the MAGIC website was also undertaken to check for records of European Protected Species (EPS) licences for Great Crested Newt (GCN) (*Triturus cristatus*) and bat species within 2km of the site. EPS licences dated within the past 10 years are considered to be most relevant.

Where the site is identified to be located within the Impact Risk Zone (IRZ) for a statutory designated site (e.g. Special Protection Area (SPA)/ SAC/Ramsar or SSSI) the features for which the designated site is notified and the types of proposed development which could potentially have adverse impacts (and trigger the requirement for further assessment, e.g. Habitat Regulations Assessment (HRA) or SSSI Impact Assessment) have also been reviewed.

Biodiversity action plans/priority habitats and species

UK Biodiversity Action Plans (BAPs) set priorities for nationally important habitats and species. To support the BAPs, Habitat/Species Statements (otherwise known as Habitat Action Plans (HAPs) and Species Action Plans (SAPs)) were produced to provide an overview of the status of the habitats/species and set out the broad policies that can be developed to conserve them. A list of priority habitats and 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 Framework⁶ to 2030.

Despite this, the UK BAP priority species lists and conservation objectives still remain valid through integration with local BAPs (which remain valid), and in the form of the Habitats and Species of Principal Importance list (as required under Section 41 of the Natural Environment and Rural Communities (NERC) Act, 2006)⁷.

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 desk study reviewed UK BAP and LBAP habitats and species with consideration as to which habitats/species are of relevance to the site and/or proposed development.

Local environmental records centre

A data consultation with the Local Environmental Records Centre (LERC), Greenspace Information for Greater London (GIGL), for a 2km search radius around the site was also undertaken and the data received was reviewed to identify the location and citations of any local non-statutory designated sites and the presence of any protected/priority species.

A summary of the records received from GIGL is discussed under 'Species Records' in Section 4.1. The records discussed under each relevant sub-heading have been included based on their relevance to the site e.g. there are suitable habitat types present on site to support the species, there is habitat connectivity between the site and record location and/or the record is in proximity of the site. Records dated within the past 10 years have also been favoured.

The combination of actions described above provided the overall ecological context for the site, to better inform the site walkover and the subsequent assessment.

3.2 SITE WALKOVER

Habitats

The extent, distribution, type and categories of the different habitats on site were identified and mapped according to the standard UKHab methodology, using the UKHab primary codes, and UKHab secondary codes in square brackets (e.g. g4 [128]) to provide supplementary information where appropriate. Mandatory codes for habitat mosaics, priority and Annex 1 habitats that occur in multiple primary habitats have also been applied where appropriate. Any features of interest were recorded using Target Notes (TN). Any protected plant species and/or invasive non-native species (INNS) present were also noted.

The abundance of plant species recorded was classified according to the DAFOR rating scale. The standardised terms are: D – Dominant, A – Abundant, F – Frequent, O – Occasional and R – Rare.

Species

The site walkover included assessments to identify the potential value for legally protected or priority species at the site. This involved identifying potential habitats which support opportunities for refuge, breeding and foraging in the context of species known to be present locally and regionally.

The likelihood of occurrence is ranked as follows:

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

The species considered potentially relevant to the site and therefore taken into consideration included:

Amphibians

The site walkover assessed the habitats on site for their suitability to support GCN and/or other native amphibians, e.g. common toad (*Bufo bufo*), common frog (*Rana temporaria*). The aquatic and terrestrial habitats required generally include still waterbodies suitable for breeding and woodland, scrub or grassland habitat where there is optimal invertebrate prey potential and/or shelter.

Bats

The PEA considers foraging/commuting bats and roosting bats (summer/transitional and winter hibernation).

Habitats such as woodland, meadows and waterbodies can provide important foraging resources and linear features such as tree lines, hedgerows, railway and river corridors are often considered valuable for commuting bats. The site walkover included recording the presence/assessing the suitability of the habitats and features present on the site, in combination with habitat connectivity associated with the wider landscape.

The site walkover included a high level general assessment of trees and buildings for Potential Roosting Features (PRFs).

In accordance with the Bat Conservation Trust's (BCT) Good Practice Guidelines⁸ and methods given in the CIEEM Bat Mitigation Guidelines⁹ consideration was given to:

- The presence, location, type and suitability of PRFs; and
- Signs of bat activity or presence including bat sightings, audible bat chattering, droppings, stains (including grease marks and urine spatter), scratch marks, and moth/butterfly wings.

Guidance from BCT ranks bat roosting and foraging suitability on a scale through None, Negligible, Low, Moderate and High. The parameters for each of these are as follows:

- None - Relates to a site with 'no habitat features suitable for bats';
- Negligible - Relates to a site with no 'obvious habitat features likely to be used by bats';
- Low - Relates to a site with only a few roost sites that could be used by individual bats 'opportunistically', and foraging and commuting habitat which is 'not very well connected' and only suitable to support small numbers of bats;
- Moderate - Relates to a site with PRFs that could be used regularly by bats but not for roosts of high conservation status, and foraging and commuting habitat which is 'continuous' and 'connected to the wider landscape'; and,
- High - Relates to a site with one or more potential roost sites that could support 'larger numbers of bats on a more regular basis and also have suitability to support high conservation status roosts, e.g. maternity roosts. High suitability foraging and commuting habitat is well connected and likely to be used regularly by bats for flight paths e.g. rivers, valleys etc and could even be connected to a roost site(s).
- PRFs can include buildings, bridges, tunnels and caves with cracks or gaps leading into voids or crevices, or trees with holes, crevices or splits of sufficient size and depth. Based on the number, location and type of PRF(s) the buildings/structures were categorised based on the categorisations provided above.

Birds

During the site walkover, the potential for the site to support breeding and/or non-breeding bird species was assessed. This included recording the presence/absence of areas of trees, scrub, heathland, arable and wetland habitat that could support nests or provide foraging resources for common or notable species. Consideration was also given to the presence/absence of features on-site that may support Wildlife and Countryside Act (WCA) 1981 (as amended) Schedule 1 species, e.g. barn owl (*Tyto alba*), black redstart (*Phoenicurus ochruros*), and kingfisher (*Althedo atthis*).

A re-assessment of Birds of Conservation Concern¹⁰ (version 5) (BoCC5) defined rare and threatened bird species on two lists (Red and Amber) describing the level of threat to each species of concern.

'Red' is the highest conservation priority, with species needing urgent action due to either a historical decline in breeding population, severe (>50%) decline in breeding or non-breeding population, or severe decline in breeding range over 50 years or more. 'Amber' is the next most critical group, with species

qualifying for this status as a result of either recovery from red list criterion, being classed as rare breeders in the UK, moderate (>25%) decline in breeding or non-breeding population or moderate decline in breeding range over 25 years or more. These categories are followed by 'Green', which indicates a species is relatively unthreatened.

Invertebrates

As part of the site walkover the quality of invertebrate habitat and the potential for the site to support notable terrestrial and aquatic invertebrate species was considered. There is a wide variety of habitats that are suitable for invertebrates including wetland, heathland, areas of bare sandy soil, ephemeral brownfield vegetation and meadows. The diversity of the habitat structures and features present is important along with food sources for supporting specific needs/life stages/population numbers.

Species of particular interest included, but were not limited to, stag beetle (*Lucanus cervus*), roman snail (*Helix pomatia*), glow worm (*Lampyrus noctiluca*) and notable butterfly species for the region.

Reptiles

The potential for widespread reptile species to use the site was assessed during the site walkover. Possible species include adder (*Vipera berus*), grass snake (*Natrix helvetica*), slow worm (*Anguis fragilis*) and common lizard (*Zootoca vivipara*). These native reptile species generally require open areas with low, mixed-height vegetation, such as heathland, rough grassland, and open scrub or, in the case of grass snake, waterbody margins. Suitable well drained areas and frost-free features for hibernation are needed to survive the winter.

Protected/priority plant species

During the site walkover, presence of plant species protected under the WCA 1981 (as amended) Schedule 8 or NERC Act 2006 Section 41 were searched for (seasonal timing allowing).

Invasive non-native species

During the site walkover, presence of plant and animal species listed as invasive under the WCA 1981 (as amended) Schedule 9 were searched for. As and where appropriate to the site habitats present, these included but were not necessarily limited to, Japanese knotweed (*Reynoutria japonica*), Himalayan balsam (*Impatiens glandulifera*) and giant hogweed (*Heracleum mantegazzianum*).

In addition, where species that are not WCA 1981 (as amended) Schedule 9 listed species, but which are considered to have 'invasive tendencies' were encountered, these were also recorded e.g. buddleia (*Buddleja davidii*), snowberry (*Symphoricarpos alba*), common horsetail (*Equisetum arvense*) etc (list not exhaustive). Similarly, any species identified to be included on the London Invasive Species Initiative (LISI) list were recorded, where seen.

Other priority/notable species

Where desk study data indicates the potential for presence of BAP priority species or other notable/rare species not protected by statute, effort was made to establish the potential for the site habitats to support these species during the site walkover.

Species of particular consideration included, but were not limited to, hedgehog (*Erinaceus europaeus*).

3.3 SURVEYORS/COMPETENCIES

Morgan Taylor, Director, has a bachelors and masters degree in Marine Biology (MSci Hons). Morgan is a Chartered Environmentalist, Full member of CIEEM and has over 14 years' experience in ecological surveying, having undertaken assessments of numerous development sites of this type. He leads the Nature team at Greengage.

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.

Mike Harris has a Bachelor's degree in Environmental Biology (BSc Hons), a Natural England Great Crested Newt Licence and Dormouse Licence, is a Chartered Environmentalist (CEnv) and Full member of CIEEM. Mike has over 20 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was prepared by Sam Barker, reviewed by Morgan Taylor and approved by Mike Harris who confirms that the report is in line with the following:

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

3.4 CONSTRAINTS

Only those records provided with a six or greater OS grid reference have been given a distance from the site boundary. Those records where locations are confidential and/or grid references provided are either two or four figure OS grid references have been listed, however, no conclusion has been drawn on the distance from site as records at this level cover either 1 or 10km square grids.

The survey was undertaken under significant time constraints. We believe appropriate consideration has been given to the status of habitats at the site and the potential impacts of the event(s), however the timing has not allowed the level of consultation that would ideally be followed for such a project. We do not believe this constitutes a significant constraint to the point that it undermines the reliability of this report, assuming onward recommendations for survey and impact assessment process is followed and relied on for future year's events, and actions are applied retrospectively to address impacts of this year.

Site preparation had already begun when the site survey was undertaken. This limited access to some areas of the site, for example where staging had already been installed. This is not likely to have resulted in any change in conclusions within this report (it was possible to, regardless, determine habitat distribution, suitably characterise habitats and identify general value for key ecological receptors) however works may have degraded some habitats prior to assessment. This should be accounted for in

the BNGA, with a conservative approach taken to defining baseline habitats against which improvements are measured.

It is acknowledged that this is a highly sensitive project with emotive opinions on both sides. This report seeks to state objective fact relating to observed ecological receptors in the context of a typical planning assessment. Any use of statements or facts within should be fully contextualised if reported on. It is not the responsibility of this assessment to determine the overall appropriateness of the proposals, rather to outline informed conclusions relating to potential existing value and associated effects of events in relation to ecology.

4.0 RESULTS

4.1 DESK STUDY

Environmental databases

Designated sites

The desk study has not identified any statutory designations associated with the site itself.

The desk study has identified one statutorily designated site within 2km of the site. This is Unigate Wood LNR, 1.98km southwest of the site. This is included within Table 4.1 below.

The desk study has identified that the site is located within the Impact Risk Zone (IRZ) for Wimbledon Common SSSI, which is 7.9km west of the site.

Records received from GIGL identified that the park is a non-statutory SINC. The GIGL desk study also identified a further 31 non-statutory designated sites within 2km of the site.

Table 4.1 below gives the locations and descriptions of those non-statutory designated sites in order of their proximity to the site. Only those that are likely to be impacted by the events are provided below (1 km). However, the full list is provided as Appendix B.

Table 4.1 Statutory and Non-Statutory Designated Sites identified within 2km Search Radius

Site name and designation	Approximate location and direction from the site (km)	Description/citation
Statutory		
Unigate Wood LNR	1.98 southwest	A diverse area of deciduous woodland with mixed meadow grassland with good ground flora and scrub habitat. The habitats support diverse populations of birds and are used by bats.
Non-statutory		
LaB03 - Brockwell Park	Encompasses the site	The park combines a variety of formal recreational facilities with large areas of open parkland, woodland and a series of linked ponds. The ponds are vestiges of an original tributary of the River Effra. The Effra flows into the Thames near Vauxhall Bridge. Less frequently mown patches support a number of wildflowers. The meadow

		parkland has been slowly extended over time.
LaB11 - Rail Linesides - Peabody Hill, Peabody Allotments and Rosendale Allotments	0.10 south	Peabody Hill is an open space over the railway line between North Dulwich and Tulse Hill. The site is predominantly woodland with some peripheral grassland and includes the adjacent (inaccessible) railside land and tunnel entrances.
LaB11 - Railway Lineside - Loughborough Junction and Brixton to Herne Hill	0.12 northeast	Peabody Hill is an open space over the railway line between North Dulwich and Tulse Hill. The site is predominantly woodland with some peripheral grassland and includes the adjacent (inaccessible) railside land and tunnel entrances.
SoB110 - Sydenham Hill Railway Cuttings	0.32 southeast	The wooded railsides between Sydenham Hill and West Dulwich stations are a valuable corridor for wildlife. The site is also relatively undisturbed and of value to bird species that prefer rougher habitats tolerant of disturbance
LaL08 - Tulse Hill Nature Garden and Harmony Garden	0.38 west	A mix of trees and scrub, with ruderal vegetation creating a pocket park. The nettles are valuable as the larval food-plant of several common butterflies. Common birds are also found in the nature garden.
SoL31 - Herne Hill Stadium	0.48 east	The most interesting part of the site for nature conservation is a sizeable area of land along the southwestern boundary of the velodrome, which consists mostly of roughland with smaller areas of non-native sycamore woodland to the north-west. The mosaic of habitats are likely to provide foraging and refuge for invertebrates (particularly butterflies), nesting birds,

		hedgehogs and common reptile species.
LaL46 - Effra Nature Garden	0.54 north	A locally important nature garden space managed with ecology and wildlife in mind. The garden is comprised of denser areas of scrub and tall herbs around pockets of meadow grassland.
SoBII02 - Grove Park Cutting	0.62 east	Southwark's longest railway corridor stretching from Peckham roughly in the centre of the borough to just beyond North Dulwich. At its broadest part at Grove Park, between Peckham Rye and Denmark Hill stations, the vegetation is largely dense sycamore woodland that woodland has a good structure. There are also areas of roughland consisting of a typical mix of coarse grasses, tall herbs and scrub.
SoBII09 - Belair Park	0.71 southeast	An historic landscaped park with a lake fringed with woodland, and some pollarded oaks. The rest of the park is mostly amenity grassland but contains some mature trees.
LaL38 - South London Botanical Institute Garden	0.73 south	A formal garden with densely planted themed borders separated by paved paths. At the heart of the garden is the pond supporting native wetland plants and providing a home for amphibians.
LaL02 - Brixton Hill Green Corridor	0.76 northwest	A near continuous linear park which gives a green background for almost the whole eastern side of Brixton Hill.
SoBII03 - Sunray Gardens	0.78 northeast	This small park in North Dulwich contains a sizeable spring-fed pond, one of very few natural ponds in Southwark and small area of wet woodland.

LaL25 - Hill Mead Schools Nature Gardens	0.79 north	A small nature garden are located within the Moorlands Estate and contains a pond supporting frogs and aquatic vegetation, there is also some planted hedgerows
LaB10 - Railway Linesides - Leigham Vale and Tulse Hill Junctions	0.89 south	Streatham Hill station is surrounded by walls of trees. Leigham Vale Junction includes two wooded cuttings leading into tunnels, and an area of undisturbed grassland between three railway lines. Beyond Leigham Vale, a further two deep, well-vegetated cuttings occur along the route into Streatham. Steep banks support an abundance of wild flowers, and there are a range of trees.
LaL32 - Loughborough Park	0.94 north	The park contains a large number of scattered trees and several planted shrubberies. The abundance of trees and shrubs provides good habitat for birds and some areas of the amenity grassland have a relaxed mowing regime.

The review of MAGIC identified a single 2016 EPS mitigation licence within 2km of the site. This related to a common pipistrelle roost, approximately 1.5 km north east of the site.

BAPs/priority habitats and species

UK BAP

The following UK BAP priority habitats/species were present at the site or in the immediate vicinity:

- Native hedgerows.

London BAP

The London BAP and London Biodiversity Partnership was disbanded in 2009 however, several of the habitats and species listed within this remain priority habitats for nature restoration within London¹¹.

Those priority habitats and species present at site or in the immediate vicinity include:

- Parks & urban green spaces;
- Built structures; and
- Meadows and pastures.

Lambeth BAP

The Lambeth BAP was active for the years 2019 - 2024 and had seven specific habitat action plans, even though this is now not in use, the action plans are still relevant for actions to deliver benefits for nature. Those action plans of relevant to the site are:

- Parks and open spaces; and
- Woodlands and trees.

Local environmental records centre

Species records

The data consultation with GIGL returned records of relevance to the site relating to amphibians, birds, plants, invertebrates, bats, other terrestrial mammals and reptiles within 2km of the site.

Amphibians

GIGL provided records of two amphibian species within 2km of the site these were common toad and common frog. The closest amphibian record was 13 metres (m) west of the site. Both species are listed as priority species under Section 41 of the Natural Environment and Rural Communities Act 2014 (NERC S41) and are London priority species.

Table 4.2 Summary of native amphibian records within 2km of the site

Common name	Scientific name	Distance & direction from site of closest record	Designation
Common toad	<i>Bufo bufo</i>	13m west	NERC S41, London priority species
Common frog	<i>Rana temporaria</i>	410m west	NERC S41, London priority species

Birds

GIGL returned records for 42 no. of bird species within 2km of the site that are specifically protected or considered notable (it should be noted that all birds are protected under the WCA 1981 as amended whilst breeding). Of these 42, 23 of the species have been recorded within the site and a further six within 50m of the site.

A total of nine WCA 1981 (as amended) Schedule 1 bird species were included within the records. 22 of the records also comprised BoCC¹² Red listed species, 13 were BoCC Amber listed species. Eleven of the species are identified as priority species for London.

The full list of species recorded within 2km of the site is provided in Table 4.3.

Table 4.3 Summary of protected/notable bird species records within 2km of the site

Common name	Scientific name	Distance of nearest record from site	Designation
Lesser redpoll	<i>Acanthis cabaret</i>	960m southwest	Red
Skylark	<i>Alauda arvensis</i>	Within site boundary	Red, London priority
Kingfisher	<i>Alcedo atthis</i>	Within site boundary	Schedule 1 of WCA, Amber
White-fronted goose	<i>Anser albifrons</i>	Within site boundary	Amber
Swift	<i>Apus apus</i>	Within site boundary	Red
Short-eared owl	<i>Asio flammeus</i>	Within site boundary	Schedule 1 of WCA, Amber
Pochard	<i>Aythya ferina</i>	Location confidential	Red, London priority
Cetti's warbler	<i>Cettia cetti</i>	Location confidential	Schedule 1 of WCA
Greenfinch	<i>Chloris chloris</i>	Within site boundary	Red
Cuckoo	<i>Cuculus canorus</i>	38m south	Red
House Martin	<i>Delichon urbica</i>	Within site boundary	Red
Lesser spotted woodpecker	<i>Dryobates minor</i>	Within site boundary	Red, London priority
Reed bunting	<i>Emberiza schoeniclus</i>	Within site boundary	Amber, London priority
Peregrine	<i>Falco peregrinus</i>	Location confidential	Schedule 1 of WCA, London priority
Hobby	<i>Falco subbuteo</i>	Location confidential	Schedule 1 of WCA
Pied flycatcher	<i>Ficedula hypoleuca</i>	Within site boundary	Amber
Herring gull	<i>Larus argentatus</i>	Within site boundary	Red
Lesser black-backed gull	<i>Larus fuscus</i>	38m south	Amber
Linnet	<i>Linaria cannabina</i>	Within site boundary	Red, London priority
Gadwall	<i>Mareca strepera</i>	38m south	Amber
Common scoter	<i>Melanitta nigra</i>	38m south	Red
Red Kite	<i>Milvus milvus</i>	Location confidential	Schedule 1 of WCA
Grey wagtail	<i>Motacilla cinerea</i>	Within site boundary	Amber
Spotted flycatcher	<i>Muscicapa striata</i>	Within site boundary	Red, London priority
House sparrow	<i>Passer domesticus</i>	Within site boundary	Red
Black redstart	<i>Phoenicurus ochruros</i>	Location confidential	Schedule 1 of WCA, London priority

Dunnock	<i>Prunella modularis</i>	Within site boundary	Amber
Firecrest	<i>Regulus ignicapilla</i>	Location confidential	Schedule 1 of WCA
Sand martin	<i>Riparia riparia</i>	Within site boundary	Amber
Whinchat	<i>Saxicola rubetra</i>	Within site boundary	Red
Woodcock	<i>Scolopax rusticola</i>	473m northeast	Red
Common tern	<i>Sterna hirundo</i>	38m south	Amber
Arctic tern	<i>Sterna paradisaea</i>	1.51km southeast	Red
Tawny owl	<i>Strix aluco</i>	182m south	Amber
Starling	<i>Sturnus vulgaris</i>	Within site boundary	Red, London priority
Mistle thrush	<i>Turdus viscivorus</i>	Within site boundary	Amber
Song thrush	<i>Turdus philomelos</i>	Within site boundary	Red, London priority
Fieldfare	<i>Turdus pilaris</i>	Within site boundary	Red
Redwing	<i>Turdus iliacus</i>	Within site boundary	Red
Ring ouzel	<i>Turdus torquatus</i>	38m south	Red
Barn owl	<i>Tyto alba</i>	Location confidential	Schedule 1 of WCA
Lapwing	<i>Vanellus vanellus</i>	960m southeast	Red, London priority

Protected/notable plant species

GIGL returned records of 13 protected and notable plant species recorded within 2km of the site. Two of the species Jersey cudweed (*Gnaphalium luteoalbum*) and meadow clary (*Salvia pratensis*) are protected under schedule 8 of the WCA 1981 (as amended). Cornflower (*Centaurea cyanus*) is listed under Section 41 of the NERC Act.

One species, service tree (*Sorbus domestica*) is listed as critically endangered under the IUCN Red List (Redlist_CE) and two species listed as vulnerable under the same Red List (Redlist_VU). Furthermore, service tree is considered Nationally Rare (NR) in the United Kingdom (UK) and seven species provided are considered Nationally Scarce (NS).

The full list of species recorded within 2km of the site is provided in Table 4.4.

Table 4.4 Summary of protected/notable plant species records within 2km of the site

Common Name	Scientific Name	Distance of nearest record from site	Designation
Field garlic	<i>Allium oleraceum</i>	1.71km northeast	Redlist_VU
Chives	<i>Allium schoenoprasum</i>	1.14 north	NS
Box	<i>Buxus sempervirens</i>	1.04km southeast	NR
Cornflower	<i>Centaurea cyanus</i>	243m southwest	NERC S41

Fritillary	<i>Fritillaria meleagris</i>	1.65km northeast	NS
Corn marigold	<i>Glebionis segetum</i>	1.39km west	Redlist_VU
Jersey cudweed	<i>Gnaphalium luteoalbum</i>	1.45km northwest	Schedule 8 of WCA
Sea buckthorn	<i>Hippophae rhamnoides</i>	1.87km east	NS
Welsh poppy	<i>Meconopsis cambrica</i>	1.20km southwest	NS
Medlar	<i>Mespilus germanica</i>	172m north	NS
Meadow clary	<i>Salvia pratensis</i>	890m northwest	Schedule 8 of WCA, NS
Service tree	<i>Sorbus domestica</i>	887m northwest	Redlist_CE, NR
Large-leaved lime	<i>Tilia platyphyllos</i>	Within site boundary	NS

Invertebrates

The desk study data provided by GIGL identified 25 protected and notable species of invertebrates within 2km of the site.

Five of the species were recorded within the site boundary, these were stag beetle, small copper (*Lucaena phlaeas*), large skipper (*Ochlodes sylvanus*), small skipper (*Thymelicus sylvestris*) and cinnabar (*Tyria jacobaeae*) with three others recorded within 50m of the site.

Stag beetle and Jersey tiger (*Euplagia quadripunctaria*) are recorded under Annex II of the Habitats and species directive (Hab&Spe Dir Annx. 2), these are species whose favourable conservation status requires the designation of SACs in strategically important places for those species.

Knot grass (*Acronicta rumicis*), stag beetle, white-letter hairstreak (*Satyrion w-album*), brown hairstreak (*Thecla betulae*) and cinnabar are all listed as UK priority species under Section 41 of the NERC Act. Additionally brown hairstreak species listed as vulnerable under the IUCN Red List (Redlist_VU) and white letter hairstreak is listed as endangered under the IUCN Red List (Redlist_EN).

Six of the invertebrate species are listed as Nationally Notable A (NNA) species, which indicates that there they are nationally rare, with five species listed as Nationally Notable B (NNB) species which are those considered nationally scarce. *Callicera aurota* is classified as Nationally Scarce (NS) under the UK Redlist.

Of the 25 species, eight are also considered London priority species.

The full list of these species are provided in Table 4.5.

Table 4.5 Summary of invertebrate records within 2km of the site

Common name	Scientific name	Distance of nearest record from site	Designation
Knot grass	<i>Acronicta rumicis</i>	1.60km northwest	NERC S41
Red-girdled mining bee	<i>Andrena labiata</i>	1.61km southeast	NNA

Four-banded flower bee	<i>Anthophora quadrimaculata</i>	1.59km northeast	NNB
Deep-brown dart	<i>Aporophyla lutulenta</i>	1.08km southwest	London priority species
A true bug	<i>Asiraca clavicornis</i>	1.22km east	NNB
A true fly	<i>Callicera aurata</i>	1.68km southeast	NS
Dusky thorn	<i>Ennomos fuscantaria</i>	1.60km northwest	NERC S41
Jersey tiger	<i>Euplagia quadripunctaria</i>	0.03km north	Hab&Spe Dir Annx. 2.
Brown tree ant	<i>Lasius brunneus</i>	1.61km north	NNA
Stag beetle	<i>Lucanus cervus</i>	Within site boundary	Hab&Spe Dir Annx. 2, NERC S41, London priority species
Small copper	<i>Lucaena phlaeas</i>	Within site boundary	London priority species
A true fly	<i>Mintho rufiventris</i>	1.31 southeast	NN
Iris weevil	<i>Mononychus punctumalbum</i>	0.96km southeast	NNA
A beetle	<i>Nicrophorus interruptus</i>	1.22km east	NNB
Painted nomad bee	<i>Nomada fucata</i>	1.70km southeast	NNA
Large skipper	<i>Ochlodes sylvanus</i>	Within site boundary	London priority species
A beetle	<i>Phytoecia cylindrica</i>	1.69km south	NNB
A beetle	<i>Polydrusus formosus</i>	0.02km south	NNA
A true bug	<i>Reptalus (Reptalus) panzeri</i>	1.21km east	NNB
White-letter hairstreak	<i>Satyrrium w-album</i>	0.20km west	NERC S41, London priority species, Redlist_EN
A beetle	<i>Stictoleptura scutellata</i>	0.94km southeast	NNA
Brown hairstreak	<i>Thecla betulae</i>	0.16km west	NERC S41, London priority species, Redlist_VU
Essex skipper	<i>Thymelicus lineola</i>	0.09km north	London priority species
Small skipper	<i>Thymelicus sylvestris</i>	Within site boundary	London priority species
Cinnabar	<i>Tyria jacobaeae</i>	Within site boundary	NERC S41

Bats

The data provided by GIGL returned five species of bat recorded within 2km of the site.

All bat species are protected under Annex 4 of the European Habitats and Species Directive, making them a European Protected Species (EPS). In addition, all bat species are additionally protected in the

UK under Schedule 5 of the WCA 1981 (as amended). Separately, soprano pipistrelle (*Pipistrellus pygmaeus*) and noctule (*Nyctalus noctula*) are listed as UK priority species under Section 41 of the NERC Act.

All five species recorded are also listed as London priority species. The desk study results are provided in Table 4.6.

Table 4.6 Summary of bat records within 2km of the site

Common name	Scientific name	Distance of nearest record from site	Designation
Leisler's bat	<i>Nyctalus leisleri</i>	1.77km southeast	EPS, WCA5, London priority species
Noctule	<i>Nyctalus noctula</i>	902m south	EPS, WCA5, NERC S41, London priority species
Nathusius' pipistrelle	<i>Pipistrellus nathusii</i>	902m south	EPS, WCA5, London priority species
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	133m west	EPS, WCA5, London priority species
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	902m south	EPS, WCA5, NERC S41 London priority species

Other terrestrial mammals

The only records for other terrestrial mammals provided by GIGL within 2km of the site were for hedgehog. Hedgehogs are listed under Section 41 of the NERC Act and a London priority species. The details are shown in Table 4.7.

Table 4.7 Summary of other terrestrial mammal records within 2km of the site

Common name	Scientific name	Distance of nearest record from site	Designation
Hedgehog	<i>Erinaceus europaeus</i>	41m west	NERC S41, London priority species

Reptiles

A single reptile species was provided within the GIGL desk study data, within 2km of the site. Slow worm is listed under Section 41 of the NERC Act and a London priority species. The details are shown in Table 4.8.

Table 4.8 Summary of reptile records within 2km of the site

Common name	Scientific name	Distance of nearest record from site	Designation
Slow worm	<i>Anguis fragilis</i>	760m south	NERC S41, London priority species

4.2 SITE WALKOVER

The site walkover was carried out on 15th May 2025 by Sam Barker, Senior Consultant and Morgan Taylor, Director during sunny and warm weather conditions.

The site extents and habitats are shown at Figure A.2 - Figure A.5, with a full botanical species list at Appendix C and photographs presented at Appendix D.

Habitats

g4 - Modified grassland

Two distinct swards of modified grassland were identified throughout the site, those that were mown frequently, with a low sward height (g4 [106]) and those that had been less frequently mown (g4 [128]), with a longer sward height. Additionally, areas of scattered scrub [10] and scattered trees [32] were present oversailing the grassland. These are described further, below.

g4 [106] Modified grassland [mown]

The vast majority of the site was comprised of a very short (less than 100mm) sward of grass, within these areas, patches of bare and compacted ground were recorded. These areas of grassland were dominated by perennial rye-grass (*Lolium perenne*) - D, annual meadow grass (*Poa annua*) - D, with broadleaved plantain (*Plantago major*) - A, dandelion (*Taraxacum* sp.) - A, white clover (*Trifolium repens*) - A, common daisy (*Bellis perennis*) - A, cat's-ear (*Hypochaeris radicata*) - O, yarrow (*Achillea millefolium*) - R, wall barley (*Hordeum murinum*) - R.

Additionally, shepherd's purse (*Capsella bursa-pastoris*) - F, characterised those areas that were more heavily compacted.

g4 [128] Modified grassland [tall or tussocky grass]

Around the site, particularly along peripheries and at the base of trees, areas of longer grassland were recorded. These were areas of slightly higher species diversity and showed fewer obvious signs of compaction; however, they were still dominated by coarse grass species.

Species within these areas included perennial rye-grass - D, annual meadow grass - D, rough meadow grass (*Poa trivialis*) - A, broadleaved plantain - A, wall barley - A, white clover - A, ribwort plantain (*Plantago lanceolata*) - F, meadow foxtail (*Alopecurus pratensis*) - F, cock's-foot (*Dactylis glomerata*) - F, cow parsley (*Anthriscus sylvestris*) - F, common daisy - F, creeping buttercup (*Ranunculus repens*) - F, creeping stolons of bramble (*Rubus fruticosus* agg.) - F, yarrow - F, meadow buttercup (*Ranunculus*

acris) - O, hawksbeard (*Crepis sp.*) - O, daffodil (*Narcissus sp.*) - O, sow thistle (*Sonchus oleraceus*) - O, bristly ox-tongue (*Helminthotheca echioides*) - O, autumn hawkbit (*Leontodon autumnalis*) - R, common mouse-ear (*Cerastium fontanum*) - R, speedwell (*Veronica sp.*) - R, curled dock (*Rumex crispus*) - R, meadow cranesbill (*Geranium pratense*) - R, green alkanet (*Pentaglottis sempervirens*) - R, creeping cinquefoil (*Potentilla reptans*) - R, and spear thistle (*Cirsium vulgare*) - R.

[10] scattered scrub

Within the taller grassland sward, along the eastern boundary of the site, several stands of native scrub were recorded.

Species included, bramble - F, dog rose (*Rosa canina*) - O, hazel (*Corylus avellana*) - O, Pedunculate oak (*Quercus robur*) sapling - R, Turkey oak (*Quercus cerris*) sapling - R and pollarded common lime (*Tilia x europea*) - R

[32] scattered trees

Individual trees were recorded throughout the site and typically found as individuals or small groups comprised of both native and non-native species. There was a diversity in tree age and size class, with those considered semi-mature and mature supporting features such as crevices, callusing, and rot holes.

There were a couple of dead standing trunks that had been left in-situ, with fallen limbs and deadwood left to naturally break down. These features were especially evident within the group of trees at the centre of the site.

Many of the younger trees showed evidence of stress, with extensive epicormic growth.

Tree species included, horse chestnut (*Aesculus hippocastanum*) - A, pedunculate oak - F, common lime - A, ash (*Fraxinus excelsior*) - F, Turkey oak - F, Norway maple (*Acer platanoides*) - F, London plane (*Platanus x acerifolia*) - F, poplar (*Populus sp.*) - O, hornbeam (*Carpinus betulus*) - O, maple (*Acer sp.*) - O, walnut (*Juglans regia*) - O, red oak (*Quercus rubra*) - O, alder (*Alnus glutinosa*) - R, beech (*Fagus sylvatica*) - R, redwood (*Metasequoia sp.*) - R, false acacia (*Robinia pseudoacacia*) - R, holm oak (*Quercus ilex*) - R, hawthorn (*Crataegus monogyna*) - R, silver birch (*Betula pendula*) - R, sugar maple (*Acer saccharum*) - R, sycamore (*Acer pseudoplatanus*) - R and sweet chestnut (*Castanea sativa*) - R.

h2a Native hedgerows

Three native hedgerows were recorded on site, all surrounded the 'boneyard' in the north of the site::

- Hedgerow 1, approximately 30m in length that formed the northern boundary of the 'boneyard' and included dogwood (*Cornus sanguinea*), elder (*Sambucus nigra*), field maple (*Acer campestre*), hawthorn, blackthorn (*Prunus spinosa*), dog rose and elm (*Ulmus sp.*), with cleavers (*Gallium aparine*) barren brome (*Bromus sterilis*), cock's-foot and hedge mustard (*Sisymbrium officinale*) comprising the ground flora.
- Hedgerow 2 (approximately 20m in length) and 3 (approximately 30m in length) were two sections of the hedgerow that formed the southern boundary of the 'boneyard'. These sections were bisected by an access road into the 'boneyard'. The species within both sections were the same as

each other and comprised dog rose, common lime, ash and hawthorn, with a wall barley, cock's-foot, autumn hawkbit, ribwort plantain, perennial rye-grass and barren brome ground flora.

u1b - Developed land; sealed surface

The areas of 'developed land; sealed surface' were associated with asphalt footpaths running through the site and an area known as the 'boneyard' in the north of the site. This area was used as a storage location and was constructed from crushed stone and sand.

u1b5 - Buildings

A single building was located within the site boundary. This was the old bowls clubhouse which was a single storey brick building, with a flat bitumen covered roof. The northern part of the building was open fronted with a veranda looking onto the old bowls green. All windows and entrances to the building had metal shutters covering them.

u1f [81] - Sparsely vegetated land [ruderal or ephemeral]

Around the periphery of the 'boneyard' in the north of the site, ephemeral/ruderal vegetation was recorded. The species aligned with those found within the areas of grassland, however these had been compacted significantly due to the use of the area as a storage location and car park.

Species recorded around the periphery of the boneyard included barren brome, perennial rye-grass, wall barley, cock's-foot and ribwort plantain.

Species

Amphibians

The desk study data identified common toad and common frog as being the only amphibians recorded within 2km of the site.

There were no waterbodies (ponds, rivers, ditches etc.) within the site boundary and therefore a lack of suitable breeding habitat. However, there are several ponds within the park.

Areas of taller modified grass and hedgerows provide small pockets of habitat that toads and frogs could use to migrate around the site. However, the vast majority of the site was comprised of very short and highly disturbed modified grassland that is likely to act as a barrier to dispersal and likely to leave them at risk of predation.

Taking the above into account it was considered that there was **low** potential for the habitats on site to support native amphibians.

Bats

Foraging/commuting

There were five species of bat recorded in the desk study data within 2km of the site.

These species are all common within urban areas.

The hedgerows and areas of taller grassland, especially where trees and scrub were present around the peripheries of the site, provide commuting lines for bats flying through and from/to the site.

The scrub and areas of grassland with a more diverse floral composition could attract pollinators and other flying invertebrates, providing a foraging resource for bats.

The site and park was unlit, however, the site is situated in a highly lit urban setting, especially directly east of the site around Herne Hill. Light can act as a barrier to dispersal for all but the most habituated species such as pipistrelles.

Overall it was considered that the habitats on site had **high** potential to support foraging and commuting bats.

Roosting

A full Preliminary Roosting Assessment (PRA) was not undertaken for the trees or buildings at the time of the survey. However, the older and more mature trees within the site regularly had cavities and crevices such as rot holes, limb tear outs, broken limbs and pruning damage that are likely to provide crevices and hollows that bats could use for roosting.

It was considered that those trees with PRFs were likely to have **moderate to high** potential to support roosting bats.

It is possible that some of the trees also provide appropriate hibernation potential although a more thorough PRA is required to determine this.

Birds

There were 42 species of bird provided within the desk study data. Of these, 23 species were recorded within the site. Most of those species were recorded flying over or visiting the site rather than nesting.

The trees, hedgerows and scrub present around the site provided arboreal nesting opportunities for birds. The grassland was considered unsuitable to support ground nesting birds - a record of skylark was noted in the desk study, however it is unlikely that this species would successfully nest in the site area regardless of the event(s) given the level of disturbance, including dog and fox prevalence.

Taking the above into account it was considered that the habitats on site had **high** potential to support arboreal nesting birds and **negligible** potential to support ground nesting birds.

Invertebrates

The desk study data provided records of several notable invertebrate species within 2km of the site.

Although there was not a significant amount of fallen/laid/standing deadwood around the site, where this was present, it provided habitat for saproxylic beetles including stag beetle.

The floristic diversity of the grasslands, scrub and trees was relatively low and uniform. However, the presence of a range of flower structures (umbels, coronate, bowl shaped etc.) and variety of plant structures in those areas comprised of longer grassland, scrub and trees provided a greater range of foraging and egg laying opportunities for a range of common and notable invertebrate species.

Of those species provided within the desk study, some or all larval food plants for knot grass, dusky thorn, jersey tiger, small copper, large skipper, brown hairstreak, small skipper and red girdled mining bee were all recorded within the UKHab survey.

Taking the above into account it was considered that the habitats on site had **high** potential to support notable invertebrate species.

Reptiles

Slow worm was the only reptile species provided in the desk study, within 2km of the site.

The areas of taller modified grass and hedgerows provided small pockets of habitat that reptiles could use to forage within the site. However, these were relatively isolated from each other or separated by large areas of heavily mown grassland that provided a potential barrier to movement.

Within the suitable areas there were small areas of fallen deadwood that provided sheltering opportunities.

The sunnier areas of shorter modified grassland, next to the areas of longer grass could be used by basking reptiles.

Therefore, it was considered that the habitats on site had **low** potential to support reptiles.

Protected/notable plant species

There were no protected or notable species of plants recorded during the UKHab survey. This survey was undertaken in May, an optimal time of year to identify plant species.

Therefore impacts to protected or notable plants has not been considered further.

Invasive non-native species

There were no species recorded during the PEA walkover that were listed under Schedule 9 of the WCA 1981 (as amended).

However, four species were confirmed as **present** on site and listed as LSI species of concern:

- False acacia - A priority 4 species which states are those species that are widespread for which eradication is not feasible but where avoiding spread to other sites may be required
- Turkey oak and holm oak - Priority 5 species which states are those species insufficient data or evidence was available from those present to be able to prioritise.
- Green alkanet - A priority 6 species which states are those species not currently considered to pose a threat or have the potential to cause problems in London.

Other priority/notable species

Hedgehog

Records of hedgehog have been provided by GIGL, with the closest of these being within 50m of the site.

The hedgerows and areas of tall and tussocky grassland provided foraging opportunities for hedgehog that may use the site. Areas of scrub, fallen deadwood and piles of brash and leaves provided suitable nesting opportunity, and hibernating potential during the winter months. However, those suitable areas were relatively isolated.

Therefore, it was considered that the site has **low** potential to support hedgehog and only in those areas of longer grass.

Other species

There was no evidence during the UKHab survey of and/or the habitats present onsite were not considered suitable to support all other protected and notable species. Therefore, it was considered that there was **negligible** potential for all other protected species.

5.0 EVALUATION

5.1 PROPOSALS

The footprint of the Lambeth Country Show and other events that take place across the spring and summer months, encompass approximately a third of the park. The required infrastructure and use of the site to deliver the events includes:

- Temporary walls;
- Staging;
- Tents and marquees (walled and non-walled);
- Car parking;
- Portable toilets;
- Temporary staff accommodation;
- Temporary haul roads;
- Security and lighting poles;
- Speaker and lighting scaffolding;
- Electricity generators;
- Water supplies; and
- Animal enclosures.

During the Lambeth Country Show and other events the site will host live music and performances across multiple stages and tents, fun fairs and rides, traditional agriculture shows and food and drink outlets creating an increase in footfall, artificial noise, artificial lighting, waste and other potential pollutants, and compaction of soil.

5.2 DISCUSSION AND RECOMMENDATIONS

Discussion has been provided below on the key ecological receptors that stand to be impacted by the events. High level commentary on the recommendation for additional targeted survey, appropriate mitigation, compensation and enhancement actions is provided.

Please note, any conclusions relating to predicted impact should be taken as preliminary with further surveys and a full EcIA required to predict impacts fully with greater confidence.

Detail on any measures discussed below should be included in an Ecological Management Plan (EMP) for the site.

Designated sites

Statutory

Unigate Wood LNR that is 1.98km southwest, is the only statutory designated site within 2km. Unigate Wood is designated for its deciduous woodland and meadow grassland. Given the infrastructure required for the events, the distance between the site and the LNR and the significant residential and transport infrastructure between the two sites, it has been considered that there would be negligible impacts on the site from the events.

The site falls within the IRZ for Wimbledon Common SSSI, this provides details of the types of development or land uses that will likely have an impact on the SSSI and therefore need consideration for further assessment.

The IRZ that the site falls within identified the following development/land use types that are likely to have an impact:

- Infrastructure - Airports, helipads and other aviation proposals;
- Air pollution - Livestock & poultry units with a floorspace >500m², slurry lagoons >4,000 m²; or
- Combustion - General combustion processes >50MW energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.

As the events at the site do not fall into one of these categories it is considered that the events will not have an impact on statutory designated sites and no further assessment of impacts on these is required.

Non-statutory

The park, including the site, is a designated SINC for the flower beds, planted shrubbery, scattered trees, secondary woodland, semi-improved grassland, tall herbs and vegetated walls.

Of those habitats, only the taller more diverse areas of grassland and scattered trees are within the site. To protect habitats the following measures should be undertaken and followed throughout the duration of events:

- Protective fencing around the root protection areas (RPAs) of trees should be installed, as advised by the independent arboricultural consultant;
- These fences should be maintained throughout the course of the build, break and use of the site whilst all events are taking place. No access to event staff, public, event goers or in particular vehicles should be provided into these areas;
- There should be no temporary or longer term storage of materials, generators, or other event infrastructure within these fenced off areas.
- All generators, fuel, chemical, waste and any other potentially hazardous materials that could pollute the ground should be sat on fuel spillage nappies. Spill kits should be provided across the site and any spills should be dealt with immediately after notification by a member of the event's team;

- Lighting should be directed away from trees and other vegetation.

Where impacts upon features listed in the SINC cannot be avoided compensatory action should be undertaken in the wider park.

Habitats

The recommendations to protect the SINC status are applicable to all habitats across the site.

A Biodiversity Net Gain Assessment (BNGA) should consider the impact upon habitats by the 2025 events and provide recommendations which seek to achieve a minimum 10% uplift in ecological value on the 2025 habitat baseline. The BNGA should also consider the historic impact of the years of large-scale multi-event programming at the park, taken to be 2020 and onwards given the Environment Act baseline threshold date. Actions should accordingly also compensate for the historic ecological damages incurred by past events.

In addition, a full ecosystem service assessment of the site should be considered to understand the impact on wider environmental benefits that the park provides and allow for measurement of changes following the adoption of all ecological mitigation, compensation and enhancement actions. This should also consider the social value that is derived from the site hosting the events. This is not strictly an enforceable planning requirement but should be considered as part of longer term objectives for the park.

Grassland/soils

The majority of the grassland was identified as being heavily mown, with a short sward. These areas had evidence of existing heavy compaction from previous years' events, which will likely be exacerbated as a result of the event infrastructure being installed and the number of people using the site across all event weekends.

Compaction of the soils associated with the grassland has implications beyond reduced floral diversity. When soils are compacted, the amount of carbon that can be sequestered within them is greatly reduced, compared with less compacted areas. This is a result of less space for roots to penetrate and fungi and bacteria to inhabit resulting in a breakdown of soil ecosystems and reduction in rate of carbon cycling through the plant-soil interface.

In addition, compacted soils are less able to store water and act as a 'sponge' during intense or prolonged rainfall events. Surface water run off rates are therefore likely to be significantly increased which could stand to impact surrounding residential, commercial or road infrastructure in the mid to longer term.

Trees

The trees on site have been assessed by an independent arboriculture consultant.

The trees should be protected throughout the events through:

- The inclusion of and maintaining of fenced off RPAs throughout the event period;
- Lighting should be directed away from any tree;

- Materials and equipment should not be stored within the RPA of any tree.

Failure of a number of young trees was noted throughout the site. This may be a function of past events and impacts from soil compaction/physical disturbance, or a lack of appropriate after care. Nonetheless, these trees should be replaced where necessary, or appropriately cared for to restore health where possible. A cohesive tree strategy should be put in place for the park in the context of the events to ensure that young trees are protected and cared for.

Hedgerows

The three hedgerows onsite should be protected with RPAs fenced off and no storage of materials should occur within these areas. These hedgerows should also remain unlit during the events.

Species

Amphibians

There is a low potential for common amphibians to be present onsite.

Assuming those areas of with highest potential are to be protected and maintained throughout the events, further amphibian surveys are not required to be undertaken.

To ensure that no fallen deadwood or these areas of grassland are disturbed during the events, these areas should continue to be inaccessible and fenced off during the events.

Bats

Foraging/Commuting

The desk study and habitats on site identified that the site has the potential to support foraging and commuting bats.

The staging of large scale events at the site is likely to have impacts on bats through the artificial severing of potential flightlines and foraging grounds as a result of increased artificial light, increase of noise during dusk, dawn and nighttime hours when bat activity is at its greatest.

To have a full understanding of the impacts of the events and likely future mitigation and/or compensation requirements for foraging and commuting bats, further automated bat activity surveys should be undertaken.

Automated bat activity surveys should involve the positioning of static monitoring detectors at likely key foraging and commuting routes through the site as well as 'controls' around the park. These static bat detectors should be set up and left onsite for a minimum of five consecutive nights each month (May - October 2025 and April 2026).

The findings of these surveys should inform the full EcIA for the site to cover future events.

Roosting

Summer/transitional

The trees on site and buildings immediately surrounding the site are likely to have PRFs for common species of roosting bat.

To understand whether there are any bat roosts within the trees and buildings, an initial PRA should be undertaken, findings from this should inform whether any further surveys are required and/or the level of mitigation required.

The findings of these surveys should inform the full EcIA for the site to cover future events.

Winter hibernation

The bat species recorded in the desk study predominantly use trees to hibernate.

Typically, the trees that bats use for hibernation are where there is a hollow trunk or holes that provides a stable temperature, with high humidity levels and has minimal disturbance.

Without further assessment a conclusion on likelihood of the trees onsite to have bat hibernation potential and any knock-on impacts caused by the events on any potential hibernation roosts, which would need to be considered within the full EcIA.

Therefore, it is recommended that the PRA should also include an assessment of the trees for hibernation suitability, which would be used to inform further survey and/or mitigation required.

Birds

The trees, hedgerow and scrub have the potential to support nesting birds.

To understand the diversity and abundance of birds at site and in the surrounding park, to inform required mitigation and compensation, breeding bird surveys should be undertaken.

Five dawn breeding bird survey visits should be undertaken March - May.

The findings of these surveys should inform the full EcIA for the site to cover future events.

Invertebrates

The habitats onsite provide foraging, nesting and egg laying opportunities for a variety of common and notable invertebrate species.

It is considered unlikely that the events will directly impact these individuals and with the tree protection measures in place (mentioned above), the highest value habitats for invertebrates will be protected during the events.

This said, it is possible that the events will result in direct/indirect disturbance through the severing of flight lines during key periods for certain species, e.g. stag beetle.

Furthermore, the events will in effect prevent the flowering of forbs amongst the parkland during a key period of the spring and summer. This will result in a significant loss of nectar resource for invertebrates.

No further surveys for invertebrates are considered necessary, however appropriate mitigation, compensation and enhancement actions should be enacted. These should include protection of identifiable deadwood resources, compensatory provision of additional standing deadwood outside of the influence of the event space and compensatory enhancement of surrounding habitats to provide alternative nectar resources for those lost to trampling from the events.

Reptiles

There is a low potential for slow worm to be present onsite.

Assuming areas with highest potential are to be protected and maintained throughout the events, further reptile surveys are not required to be undertaken.

Invasive non-native species

Invasive non-native species are present onsite although, species are at the lower end of LSI risk categories. These will not be impacted by the events and therefore no specific mitigation measures are required.

In the longer term, areas of invasive species should be removed and replaced with native species of ecological value.

Other priority/notable species

Hedgehog

There is a low potential for hedgehog to be present onsite.

Assuming areas with highest potential are to be protected and maintained throughout the events, further surveys are not required.

Ecological enhancements

Assuming acute impacts are mitigated and longer-term impacts are compensated for through actions during the events within the site and throughout the wider park, it may be possible to deliver overall enhancement for nature.

A cohesive strategy should be developed which addresses the required actions, being considerate of outcomes of phase 2 surveys, the EcIA and BNGA. This strategy should include consideration of the above discussion and below enhancement recommendations. These actions should be detailed within an EMP.

Habitats

- Grassland throughout the wider park should be enhanced to meet the UKHab definition for other neutral grassland, this should include a species diversification exercise to provide variety of flowering species throughout the year. Some areas could also aim for more species rich grassland typologies in smaller areas assuming ground conditions are appropriate;

- Biodiverse swales and rain gardens should be created in strategic locations to manage surface water flow and provide ephemeral wetland habitats;
- New and replacement trees should be planted with appropriate aftercare planned for;
- Large areas of diverse pollinator friendly planting along the edge of footpaths and around the site should be provided;
- New species rich native hedgerows should be planted along the perimeter fence of the park, to provide habitat for wildlife but also provide an additional noise/light/pollution barrier between the site and the road and neighbouring areas of Lambeth.

Species

- Bird and bat boxes should be installed on trees throughout the park; and
- Log piles, buried loggeries and refugia for reptiles, amphibians, small mammals and beetles should be created and installed within the areas of taller vegetation. A plan for standing dead wood retention should be included within any strategy.

General recommendations

Based on the ecological constraints identified above requiring significant further survey in order to determine the likely impacts and subsequent mitigation measures that will be applicable, an Ecological Impact Assessment (EcIA) should be produced following completion of all further surveys and used to inform approaches for future years.

All mitigation, compensation and enhancements actions identified as necessary in this EcIA should be detailed within an Ecological Management Plan (EMP). Actions relating to BNG focused solely on changes in habitat should be detailed within a Habitat Management and Monitoring Plan (HMMP).

N.B. For guidance on the validity of reports/surveys, the CIEEM Advice Note 'On The Ecological Lifespan Of Ecological Reports and Surveys'¹³ should be referred to. In summary, most reports/surveys are likely to be considered valid within 12 months of their undertaking. Within 12-18 months, also still likely to be valid but with some exceptions (refer to CIEEM Advice Note for details). Reports/surveys that are between 18 months and 3 years old are likely to require updating and reports/surveys that are more than 3 years old are unlikely to be considered valid and will need to be updated (subject to an assessment by a professional ecologist). This report/survey has been undertaken in May 2025.

Soils

The impacts of compaction on soils could be measured as part of wider informed management actions for the site and the park. Soil carbon analysis from areas that have visible compaction could be measured against those areas that are less compacted providing insight into the current health of the soils. The data collected could feed into a more detailed long term risk assessment relating to the impact of sustained compaction on soils and their ability to assist in limiting risks from future extreme climate

events. This is not strictly an enforceable planning requirement but this would be a positive action to undertake as part of longer term strategy at the park.

A note on natural capital

Fundamentally, the park constitutes a stock of natural capital, owned by the council and managed for the benefit of the community. Events will inevitably degrade that stock. This degradation is however 'externalised' meaning it is not associated with typical flows of financial capital and is not paid for by those running events. Degradation can therefore occur without being appropriately conceptualised, measured and addressed.

A 'just' approach to strategy creation for this year's event and for future years would accordingly be to 'internalise' the natural capital through considering the holistic onward impact on the environment (and factoring in historic losses) and ensuring that appropriate compensation to enhance stocks elsewhere in the park or surrounding areas is undertaken. Such an approach could form a win-win for nature and people. It is accordingly recommended that such logic is followed to develop a compensation strategy for this year's events and a broader long term strategy for future years.

6.0 CONCLUSION

Greengage was commissioned by London Borough of Lambeth to undertake a PEA of an area of the park used to host the Lambeth County Show, in the London Borough of Lambeth, in order to establish the ecological value of the site and its potential to support protected/priority habitats and species.

The PEA identified value for the following ecological receptors at the site:

- Non-statutory sites;
- Habitats;
- Soils;
- Amphibians;
- Foraging and commuting bats;
- Roosting/hibernating bats;
- Breeding birds;
- Reptiles;
- Invertebrates; and
- Hedgehog.

Additional targeted surveys for foraging, commuting and roosting/hibernating bats, breeding birds and soil health have been recommended.

This information is needed to fully assess the impacts of the proposals and accordingly inform appropriate mitigation and compensation measures for these receptors.

Preliminary mitigation, compensation and enhancement actions have been recommended to enable legislative and policy compliance (see context at Appendix E), however these should be formalised following phase 2 surveys and the EcIA.

Following the EcIA an EMP should be developed which addresses required actions. This should be committed to voluntarily to retrospectively address impacts from this year's and previous year's events, and should be conditioned for future planning consents for events in the park.

A separate BNGA report should be produced, using the Statutory Biodiversity Metric (SBM) in accordance with the Environment Act, 2021, NPPF 2024, and local policy drivers. This should include detail on how 10% gains in biodiversity are to be delivered in the park, accounting for historic impacts upon habitats from previous year's events.

Commentary has also been provided relating to potential further assessment following a natural capital approach that could be used to inform future events at the park to justly account for impact and internalise losses in natural capital, ensuring that future use of the park helps protect and restore natural capital resources.

N.B. For guidance on the validity of reports/surveys, the CIEEM Advice Note 'On The Ecological Lifespan Of Ecological Reports and Surveys' should be referred to. In summary, most reports/surveys are likely to be considered valid within 12 months of their undertaking. Within 12-18 months, also still likely to be valid but with some exceptions (refer to CIEEM Advice Note for details). Reports/surveys that are between 18 months and 3 years old are likely to require updating and reports/surveys that are more than 3 years old are unlikely to be considered valid and will need to be updated (subject to an assessment by a professional ecologist). This report/survey has been undertaken in May 2025

APPENDIX A LOCATION PLAN AND UKHAB MAPS

Figure A.1 Site location plan

BROCKWELL PARK

Legend

- Traders car park
- Event boneyard
- Lambeth Country Show Boundary
- Brockwell Park Boundary

Title: Figure A.1 Site location plan

Drawn by: SB
Date: 22/05/2025

Reviewed by: MT
Date: 22/05/2025

Project number: 553185
Sources: Google Satellite Imagery



Figure A.2 UKHab plan

BROCKWELL PARK

Legend

- Traders car park
- Event boneyard
- Lambeth Country Show Boundary
- Brockwell Park Boundary

Hedges

- h2a - Native hedgerow

Habitats

- g4 - Modified grassland
- u1b - Developed land; sealed surface
- u1b5 - Buildings
- u1f - Sparsely vegetated urban land

Title: Figure A.2 UKHab plan

Drawn by: SB
Date: 27/05/2025

Reviewed by: MT
Date: 27/05/2025

Project number: 553185
Sources: Google Satellite Imagery



Figure A.3 UKHab plan north

BROCKWELL PARK

Legend

- Event boneyard
- Lambeth Country Show Boundary
- Brockwell Park Boundary

Hedges

- h2a - Native hedgerow

Habitats

- g4 - Modified grassland
- u1b - Developed land; sealed surface
- u1b5 - Buildings
- u1f - Sparsely vegetated urban land

Title: Figure A.3 UKHab plan north

Drawn by: SB
Date: 27/05/2025

Reviewed by: MT
Date: 27/05/2025

Project number: 553185
Sources: Google Satellite Imagery



Figure A.4 UKHab plan east

BROCKWELL PARK

Legend

-  Lambeth Country Show Boundary
-  Brockwell Park Boundary

Habitats

-  g4 - Modified grassland
-  u1b - Developed land; sealed surface

Title: Figure A.4 UKHab plan east

Drawn by: SB
Date: 22/05/2025

Reviewed by: MT
Date: 22/05/2025

Project number: 553185
Sources: Google Satellite Imagery



Figure A.5 UKHab plan south

BROCKWELL PARK

Legend

- Traders car park
- Brockwell Park Boundary

Habitats

- g4 - Modified grassland

Title: Figure A.5 UKHab plan south

Drawn by: SB
Date: 22/05/2025

Reviewed by: MT
Date: 22/05/2025

Project number: 553185
Sources: Google Satellite Imagery



APPENDIX B NON-STATUTORY DESIGNATED SITES

Table B.1 Full list of non-statutory designated sites within 2km of the site

Site name and designation	Approximate location and direction from the site (km)	Description/citation
Non-statutory		
LaB03 - Brockwell Park	Encompasses the site	The park combines a variety of formal recreational facilities with large areas of open parkland, woodland and a series of linked ponds. The ponds are vestiges of an original tributary of the River Effra. The Effra flows into the Thames near Vauxhall Bridge. Less frequently mown patches support a number of wildflowers. The meadow parkland has been slowly extended over time.
LaB11 - Rail Linesides - Peabody Hill, Peabody Allotments and Rosendale Allotments	0.10 south	Peabody Hill is an open space over the railway line between North Dulwich and Tulse Hill. The site is predominantly woodland with some peripheral grassland and includes the adjacent (inaccessible) railside land and tunnel entrances.
LaB11 - Railway Lineside - Loughborough Junction and Brixton to Herne Hill	0.12 northeast	Peabody Hill is an open space over the railway line between North Dulwich and Tulse Hill. The site is predominantly woodland with some peripheral grassland and includes the adjacent (inaccessible) railside land and tunnel entrances.
SoBII10 - Sydenham Hill Railway Cuttings	0.32 southeast	The wooded railsides between Sydenham Hill and West Dulwich stations are a valuable corridor for wildlife. The site is also relatively undisturbed and of value to bird species that prefer rougher habitats tolerant of disturbance

LaL08 - Tulse Hill Nature Garden and Harmony Garden	0.38 west	A mix of trees and scrub, with ruderal vegetation creating a pocket park. The nettles are valuable as the larval food-plant of several common butterflies. Common birds, such as blackbirds, are also found in the nature garden.
SoL31 - Herne Hill Stadium	0.48 east	The most interesting part of the site for nature conservation is a sizeable area of land along the southwestern boundary of the velodrome, which consists mostly of roughland with smaller areas of non-native sycamore woodland to the north-west. The mosaic of habitats are likely to provide foraging and refuge for invertebrates (particularly butterflies), nesting birds, hedgehogs and common reptile species.
LaL46 - Effra Nature Garden	0.54 north	A locally important nature garden space managed with ecology and wildlife in mind. The garden is comprised of denser areas of scrub and tall herbs around pockets of meadow grassland.
SoBII02 - Grove Park Cutting	0.62 east	Southwark's longest railway corridor stretching from Peckham roughly in the centre of the borough to just beyond North Dulwich. At its broadest part at Grove Park, between Peckham Rye and Denmark Hill stations, the vegetation is largely dense sycamore woodland, with a shrub layer of elder and hawthorn and a ground flora of ivy, cow parsley and bramble. The woodland has a good structure. There are also areas of roughland consisting of a typical mix of coarse grasses, tall herbs, bramble and elder scrub.

SoBII09 - Belair Park	0.71 southeast	An historic landscaped park with a lake fringed with woodland, and some pollarded oaks. The rest of the park is mostly amenity grassland, but contains some mature trees.
LaL38 - South London Botanical Institute Garden	0.73 south	A formal garden with densely planted themed borders separated by paved paths. At the heart of the garden is the pond supporting native wetland plants and providing a home for frogs and newts.
LaL02 - Brixton Hill Green Corridor	0.76 northwest	A near continuous linear park which gives a green background for almost the whole eastern side of Brixton Hill.
SoBII03 - Sunray Gardens	0.78 northeast	This small park in North Dulwich contains a sizeable spring-fed pond, one of very few natural ponds in Southwark and small area of wet woodland.
LaL25 - Hill Mead Schools Nature Gardens	0.79 north	A small nature garden are located within the Moorlands Estate and contains a pond supporting frogs and aquatic vegetation, there is also some planted hedgerows
LaB10 - Railway Linesides - Leigham Vale and Tulse Hill Junctions	0.89 south	Streatham Hill station is surrounded by walls of trees. Leigham Vale Junction includes two wooded cuttings leading into tunnels, and an area of undisturbed grassland between three railway lines. Beyond Leigham Vale, a further two deep, well-vegetated cuttings occur along the route into Streatham. Steep banks support an abundance of wild flowers, and there are a range of trees.
LaL32 - Loughborough Park	0.94 north	The park contains a large number of scattered trees and several planted shrubberies. The abundance of trees and shrubs

		provides good habitat for birds and some areas of the amenity grassland have a relaxed mowing regime.
LaB09 - Palace Road Nature Garden	1.05 southwest	Habitats include non-native woodland and scrub, rough grassland and tall perennial species. A pond contains perhaps the best aquatic and marginal flora in the Borough of Lambeth.
LaB18 - Ruskin Park	1.10 northeast	The central feature is the pond encircled by trees. Dense shrubberies have been planted with a mix of native and exotic species, which provide nesting areas for common birds. The wider, western area of the park consists mainly of open amenity grassland and scattered trees
SoBI10 - Dulwich Park	1.14 southeast	A large park with areas transferred into meadow management, with a corresponding increase in butterflies and other invertebrates seen foraging in the area. A sizeable lake supports a diverse range of native emergent and marginal vegetation surrounded by broadleaved woodland, scrub and tall ruderal vegetation.
SoBI12 - James Allen's Girls' School Botany Garden	1.14 northeast	A corner of the school grounds comprises mature native woodland, herb-rich neutral grassland, a pond and planted shrubbery. The woodland is known to support a wide range of birds. The mature trees have the potential to support roosting bats and the adjacent garden, pond and scattered trees are likely to foraging for bats, particularly due to its location next to a wooded railway corridor
SoB07 - Nairne Grove Nature Garden	1.17 northeast	A small nature garden in north Dulwich with abundant tall, semi-

		mature aspen and a well-developed understorey of willow, wild privet, hazel and bramble. At the northern end is a small pond, scattered trees and a large loggery that doubles up as a climbing frame.
SoB08 - Greendale Playing Fields	1.34 northeast	The main habitats at this site are a mosaic of species-poor semi improved grassland, scrub and tall herbaceous vegetation.
SoL33 - Alleyn's School Playing Fields	1.35 east	The site comprises of School buildings, amenity planting, playing fields and mature trees. There is a small area of neutral grassland adjacent to the cricket nets.
SoBII14 - Dulwich College (Mill Pond)	1.46 southeast	As the oldest pond in Southwark, the mill pond is fringed with mature alder trees, tall marginal and bank side vegetation, surrounded by herb-rich grassland and a mature tree-lined hedgerow. Marginal vegetation is located on the eastern bank.
SoB04 - Dog Kennel Hill Wood	1.56 northeast	A small but varied site, comprising secondary woodland and an orchard. The orchard has a good diversity of heritage fruit trees, infrequently mown herb-rich grassland and tall ruderal understorey. There are also scattered mature oak trees. Numerous bat and birds boxes have been installed in the woodland and mature trees also provide potentially suitable roosting habitat for bats.
LaB23 - Royal Circus roundabout, West Norwood	1.57 south	A small, circular area of open ground surrounded by fencing and sections of tall, dense hedge, planted lines of trees and scrub. Within this boundary is a mosaic of habitats interspersed with various buildings and hard standing. The dominant habitats in the

		main part of the site include open neutral grassland, planted beds of various sizes, along with low hedges and shrub beds.
LaB21 - West Norwood Cemetery	1.60 south	A cemetery that is mostly managed as grassland with ancient oaks and a mix of non-native trees. Grassland and woodland plants line the informal paths with an area of the cemetery near the eastern edge slightly wetter and is managed for nature conservation
LaB14 - Railway Linesides - Streatham Hill	1.60 southwest	Streatham Hill station is surrounded by walls of trees. Leigham Vale Junction includes two wooded cuttings leading into tunnels, and an area of undisturbed grassland between three railway lines. Beyond Leigham Vale, a further two deep, well-vegetated cuttings occur along the route into Streatham. Steep banks support an abundance of wild flowers, and there are a range of trees.
SoBI06 - Dulwich and Sydenham Hill Golf Club	1.66 southeast	This large golf course contains pockets of mature, oak woodland, and numerous fine old/veteran and dead standing oaks scattered between the fairways. There are also several ponds and small lakes on the lower slopes (created to drain the fairways) and which support diverse scrub, marginal, emergent and floating vegetation.
LaL42 - Stockwell Park Estate Fish Pond	1.77 north	The pond has been designed with shallow, shelving edges with an abundance of marginal vegetation. The grassy edges to the pond have been planted with saplings of crack-willow (<i>Salix fragilis</i>).
LaL27 - Elam Street Open Space	1.78 north	It is mostly amenity grassland and scattered trees but has significant

		amounts of infrequently mown semi-improved neutral grasslands, particularly in a depression that once was a pond.
SoL08 - Plough Lane Pond	1.89 east	A wildlife pond located within the back garden of a private house.
LaB16 - Railway Linesides - West Norwood	1.96 south	These railsides support a range of habitats from sycamore (<i>Acer pseudoplatanus</i>) woodland, to younger trees and shrubs forming a mosaic with bramble (<i>Rubus fruticosus</i> agg.) scrub, tall herbaceous stands and false-oat (<i>Arrhenatherum elatius</i>) grassland. This is classic railside 'roughland'. Breeding birds include dunnocks, wrens and song thrushes, and sparrowhawks have been seen hunting up and down the track.

APPENDIX C BOTANICAL SPECIES LIST

Table C.1 Full list of species recorded during the UKHab survey

Common Name	Scientific Name
Alder	<i>Alnus glutinosa</i>
Annual meadow grass	<i>Poa annua</i>
Ash	<i>Fraxinus excelsior</i>
Autumn hawkbit	<i>Leontodon autumnalis</i>
Barren brome	<i>Bromus sterilis</i>
Beech	<i>Fagus sylvatica</i>
Blackthorn	<i>Prunus spinosa</i>
Bramble	<i>Rubus fruticosus agg.</i>
Bristly ox-tongue	<i>Helminthotheca echioides</i>
Broadleaved plantain	<i>Plantago major</i>
Cat's-ear	<i>Hypochaeris radicata</i>
Cleavers	<i>Gallium aparine</i>
Cock's-foot	<i>Dactylis glomerata</i>
Common daisy	<i>Bellis perennis</i>
Common lime	<i>Tilia x europaea</i>
Common mouse-ear	<i>Cerastium fontanum</i>
Cow parsley	<i>Anthriscus sylvestris</i>

Creeping buttercup	<i>Ranunculus repens</i>
Creeping cinquefoil	<i>Potentilla reptans</i>
Curled dock	<i>Rumex crispus</i>
Daffodil	<i>Narcissus sp.</i>
Dandelion	<i>Taraxacum sp.</i>
Dog rose	<i>Rosa canina</i>
Dogwood	<i>Cornus sanguinea</i>
Elder	<i>Sambucus nigra</i>
Elm	<i>Ulmus sp.</i>
False acacia	<i>Robinia pseudoacacia</i>
Field maple	<i>Acer campestre</i>
Green alkanet	<i>Pentaglottis sempervirens</i>
Hawksbeard	<i>Crepis sp.</i>
Hawthorn	<i>Crataegus monogyna</i>
Hazel	<i>Corylus avellana</i>
Hedge mustard	<i>Sisymbrium officinale</i>
Holm oak	<i>Quercus ilex</i>
Hornbeam	<i>Carpinus betulus</i>
Horse chestnut	<i>Aesculus hippocastanum</i>
London plane	<i>Platanus x acerifolia</i>
Maple	<i>Acer sp.</i>
Meadow buttercup	<i>Ranunculus acris</i>
Meadow cranesbill	<i>Geranium pratense</i>

Meadow foxtail	<i>Alopecurus pratensis</i>
Norway maple	<i>Acer platanooides</i>
Pedunculate oak	<i>Quercus robur</i>
Perennial rye-grass	<i>Lolium perenne</i>
Poplar	<i>Populus sp.</i>
Red oak	<i>Quercus rubra</i>
Redwood	<i>Metasequoia sp.</i>
Ribwort plantain	<i>Plantago lanceolata</i>
Rough meadow grass	<i>Poa trivialis</i>
Shepherds purse	<i>Capsella bursa- pastoris</i>
Silver birch	<i>Betula pendula</i>
Sow thistle	<i>Sonchus oleraceus</i>
Spear thistle	<i>Cirsium vulgare</i>
Speedwell	<i>Veronica sp.</i>
Sugar maple	<i>Acer saccharum</i>
Sweet chestnut	<i>Castanea sativa</i>
Sycamore	<i>Acer pseudoplatanus</i>
Turkey oak	<i>Quercus cerris</i>
Wall barley	<i>Hordeum murinum</i>
Walnut	<i>Juglans regia</i>
White clover	<i>Trifolium repens</i>
Yarrow	<i>Achillea millefolium</i>

APPENDIX D SITE PHOTOGRAPHS

Plate D.1 Areas of mown, compacted modified grassland representative of much of the site area (left and right).



Plate D.2 Examples of longer grassland areas protected by root protection around trees (left and right)



Plate D.3 Examples of the areas of taller more species diverse sward along the southern and eastern site boundary (left and right)



Plate D.4 Some of the trees within the tree grove in the centre of the site (both)



Plate 6.1 Deadwood in the centre of the site (left), and epicormic growth that was present on several trees (right)



Plate D.5 The evidence of compaction in the west of the site



Plate D.6 The onsite ground conditions, including aeration holes in those more compacted areas (both)



Plate D.7 The storage of event equipment within the 'boneyard' (top and bottom)



Plate D.8 The event infrastructure installed across the site (top, middle and bottom)



APPENDIX E RELEVANT LEGISLATION AND POLICY

E.1 LEGISLATION

Current key legislation relating to ecology includes the Environment Act 2021¹⁴, Wildlife and Countryside Act 1981 (as amended)¹⁵; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')¹⁶, The Countryside and Rights of Way Act 2000 (CRoW Act)¹⁷, and The Natural Environment and Rural Communities Act, 2006¹⁸.

The Environment Act, 2021

Under the Environment Act¹⁹, 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)²⁰, and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')²¹, and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')²² 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 Habitats²³ (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 Plan²⁴ (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework²⁵ (and Biodiversity 2020 strategy²⁶ 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)²⁷, 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 Annex 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 Protected/Priority Plant Species

For plant species that are listed in Schedule 5 of the Conservation of Habitats and Species Regulations 2017, it is an offence to:

- deliberately pick, collect, cut, uproot or destroy them

- possess, control or transport them (alive or dead)

A granted mitigation licence is required to carry out any of the above actions for any plant that is a EPS.

For plants, fungi and lichens protected under the Wildlife and Countryside Act 1981, it is an offence to:

- intentionally uproot any wild plant without the landowner's consent.

For plants, fungi and lichens listed in Schedule 8 of the Wildlife and Countryside Act 1981, it is an offence to:

- intentionally pick, uproot or destroy them.

A granted mitigation licence is required to carry out proposed activities.

Many plants, fungi and lichens are also listed as rare or most threatened species under Section 41 of the NERC Act 2006. Regard must be had for the conservation of Section 41 species as part of planning decisions.

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.

E.2 PLANNING POLICY

National

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2024²⁸ 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 Plan²⁹

Policy G1 Green infrastructure

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

Policy G5 Urban greening

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

Policy G6 Biodiversity and access to nature

1. Sites of Importance for Nature Conservation (SINCs) should be protected.
2. Boroughs, in developing Development Plans, should:
 - a. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks

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

Policy G7 Trees and woodlands

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

London Environment Strategy 2018³⁰

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

Objective 5.1 Make more than half of London green by 2050

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

This policy states:

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

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

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

Objective 5.2 conserving and enhancement wildlife and natural habitats

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

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

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

Local

Lambeth Local Plan 2020-2035³¹

Policy EN1: Open space, green infrastructure and biodiversity

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

1. 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.
2. 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 SINC, the mitigation hierarchy in London Plan policy G6 C will apply.
 3. 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.
 4. 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.

5. 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.

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