



Northern Estate Programme

Norman Shaw North Standalone Ecological Assessment

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HOUSE OF COMMONS
NORTHERN ESTATE PROGRAMME

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1 Introduction

- 1.1.1 This Ecological Assessment relates to an application for the Norman Shaw North Standalone works Full Planning and Listed Building Consent.
- 1.1.2 This Statement has been produced to support an application for full planning permission and listed building consent for internal and external refurbishment works to the Norman Shaw North (NSN) building, located on the Parliamentary Northern Estate. The report has been prepared by BDP Ecology on behalf of the Corporate Officer of the House of Commons.
- 1.1.3 Biodiversity is a material consideration in the planning process and consideration must be given to the protection, retention and improvement of existing biodiversity features. The proposed refurbishment and reconfiguration of Norman Shaw North will impact habitats which could potentially support protected species and particular consideration should be given to roosting bats, roof-nesting birds and other protected and notable species which are supported by urban habitats.

1.2 Description of Development

- 1.2.1 The description of development (the Proposed Development) relating to the Norman Shaw North Standalone proposals application is set out below:

“Full planning consent for the refurbishment of Norman Shaw North including the installation of a glazed roof covering to the internal courtyard, to provide further accommodation for parliamentary uses (Sui Generis); installation of chillers at ground level adjacent to the northern elevation; basement piling; alterations to the courtyard eaves to create a roof access gallery; alteration of the northern elevation; alteration of north western corner stepped plinth; alteration to Laundry Road landscape and levels to provide accessibility improvements; and crane gantry screw piling located in Commissioners Yard.

Listed Building Consent for the internal and external refurbishment, including installation of new building services and rooftop repairs and reconfiguration including rooftop louvres and reconstruction of chimneys; courtyard roof fixings; secondary glazing; and interiors; alterations to existing openings and basement vaults; and associated works including temporary construction works.”

1.3 Structure of Report

- 1.3.1 This Ecological Assessment describes and maps the habitats present on the Norman Shaw North site, assesses any potential impact on protected species or sites, identifies where further surveys may be required and provides recommendations for the protection and enhancement of Site ecology. The structure of the ecological assessment is as follows:

- Methodology
- Results
- Evaluation
- Recommendations

2 Methodology

2.1 Desktop Study

- 2.1.1 A review of ecological information held by the local records centre, Greenspace Information for Greater London CIC (GIGL) and London Bat Group, as well as other publically accessible sources online was carried out to identify any protected and notable sites and species within a 1km radius of the Norman Shaw North site.
- 2.1.2 In addition, a review of the local and national planning framework, biodiversity action plans and habitats and species of principle importance was carried out. This included:

National Policy

- National Planning Policy Framework (MHCLG, February 2019)
- UK Biodiversity Action Plan (HMSO, 1994)
- Habitats and Species of Principal Importance (Natural England, August 2010)

Local Policy

- The London Plan 2021
 - The London Biodiversity Strategy (Connecting with London's nature) (Mayor of London, July 2002)
 - Westminster City Plan (Westminster City Council, November 2016)
 - Saved Westminster Unitary Development Plan Policies (Westminster City Council, January 2007)
 - Draft City Plan 2019-2040 (Westminster City Council, June, 2019)
 - Westminster's Biodiversity Action Plan, (Westminster City Council, April 2018)
- 2.1.3 Please see Appendix A for relevant planning policies.

2.2 Site Survey

- 2.2.1 Site surveys were undertaken in May 2018 and June 2019 by Anthony Nickson. May and June are within the optimal period for ecological survey. Anthony is experienced in Phase 1 Habitat and protected species work (he holds a Natural England survey licence for bats) and is also a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM).
- 2.2.2 The site survey was undertaken to JNCC standards (Phase 1 Habitat Survey – a technique for environmental audit, JNCC, updated 2007). Habitats were mapped during the site survey and assigned a Phase 1 category. Botanical nomenclature follows Stace, C. A., 2010, New Flora of the British Isles, 3rd Ed., Cambridge University Press.
- 2.2.3 Evidence of, and/or potential for the presence of protected species was recorded during the survey. Based on the desktop study and habitat types present on the site, particular attention was paid to the following species:

Bats

2.2.4 All British bat species and their roosts are protected under European Law (The Conservation of Habitats and Species Regulations 2017) and UK Law (Wildlife and Countryside Act 1981, as amended). As such it is an offence to undertake the following acts:

- Deliberately capture, injure or kill bats;
- Damage or destroy a breeding or resting place;
- Obstruct access to their resting or sheltering places; and
- Intentionally or recklessly disturb a bat while it is in a structure or place of shelter or protection.

2.2.5 As the Proposed Development focuses primarily on an existing building, particular attention was given to bats.

Habitat Suitability

2.2.6 Initially, a review of publically accessible online mapping systems was undertaken to assess the habitats present on site and in the surrounding area. The review assessed the suitability of the habitats to support and provide connectivity for commuting and foraging bats.

Table 2.1 Guidelines for assessing the potential suitability of proposed development sites for bats based on the presence of habitat features within the landscape

Suitability	Commuting and foraging habitats
Negligible	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, treelined watercourses and grazed parkland. Site is close to and connected to known roosts.

Preliminary Roost Assessment

- 2.2.7 A preliminary roost assessment of Norman Shaw North was undertaken. An external inspection and internal inspection (where accessible) of the building was undertaken to search for, and to assess the potential for, a bat roost to be present.
- 2.2.8 External searches included, for example, looking for gaps between any soffit boards and walls, gaps between window frames and the walls, and looking for bat droppings on the walls and window ledges.
- 2.2.9 Following the external survey, an internal survey of accessible loft spaces was also carried out to search for evidence of a bat roost. This included looking for the following signs:
- live or dead bats;
 - bat droppings;
 - bat entry/exit points;
 - bat urine staining;
 - grease marks on any timbers;
 - feeding remains such as insect wings; and
 - areas clear of cobwebs.
- 2.2.10 The building was then assessed in accordance with the guidelines for assessing the potential suitability of proposed development sites for bats (BCT, 2016).

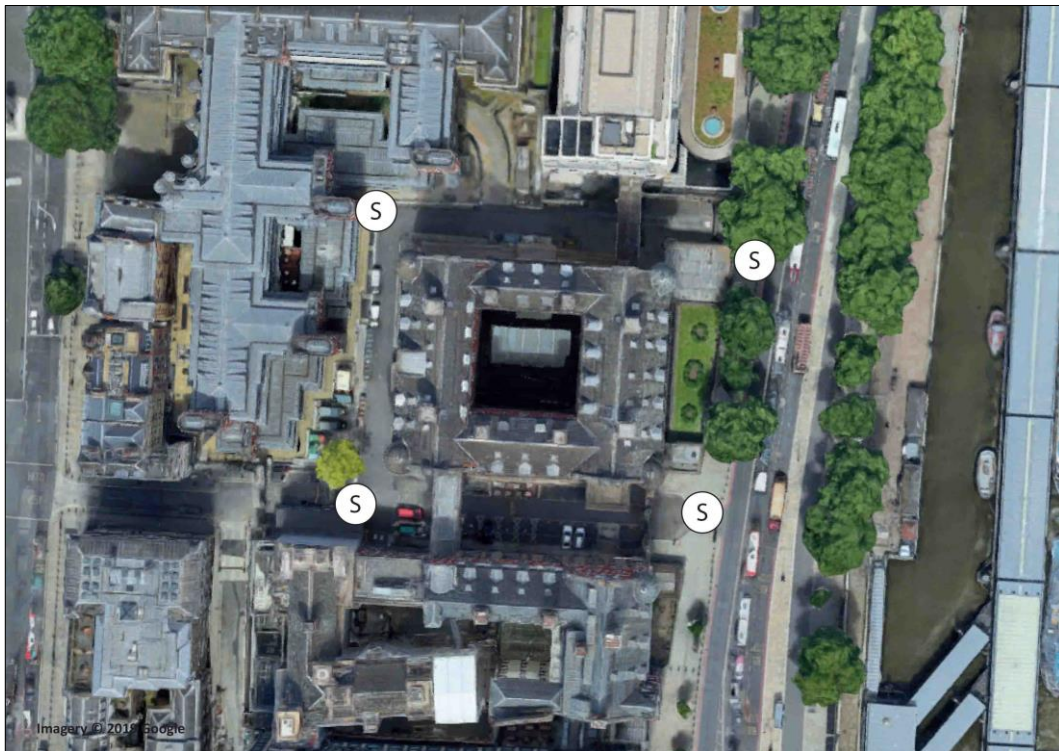
Table 2.2 Guidelines for assessing the potential suitability of proposed development sites for bats based on the presence of suitable roosting features within a structure	
Suitability	Commuting and foraging habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.

- 2.2.11 A pair of close focussing binoculars, a high-powered torch and an endoscope were used (where required) to search for evidence of bats, externally and internally.

Emergence/Re-entry Surveys

- 2.2.12 Following the preliminary roost assessment a single emergence/re-entry survey was carried out on Norman Shaw North to check for the presence/absence of bats within the buildings.
- 2.2.13 For the survey, the surveyors were located strategically to ensure all potential bat access points on the building were accounted for, and the surveyors monitored the building visually to determine whether or not any bats emerged from, or entered the building. Further to this, each surveyor used an Anabat Scout bat detector to record the echolocations of any bat activity in zero crossing so that the calls could later be identified to species or at least genus level.

Figure 2.1. Norman Shaw North dawn re-entry surveyor locations on 08/06/2019



- 2.2.14 The dawn re-entry survey began 90 minutes before sunrise and continued for 15 minutes after sunrise.
- 2.2.15 The presence/absence survey and reporting was led by Anthony Nickson. Anthony holds a Natural England Class 2 survey licence (2015-16233-CLS-CLS) for bats, he is experienced in undertaking bat surveys and producing and implementing bat mitigation strategies for European Protected Species Mitigation (EPSM) licences. He is also a full member the Chartered Institute of Ecology and Environmental Management.
- 2.2.16 Anthony was assisted with the emergence/re-entry survey by Richard Lowe, Aiden Pickering and Rosemarie Pickering. All surveyors are experienced in undertaking presence/absence surveys.

Birds

2.2.17 All birds, their nests and eggs are protected at the nest under UK Law (Wildlife and Countryside Act 1981, as amended). As such it is an offence to intentionally undertake the following acts:

- Kill, injure or take any wild bird
- Take, damage or destroy the nest of any wild bird whilst it is in use or being built
- Take or destroy the egg of any wild bird
- Intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

3 Results

3.1 Desktop Study

3.1.1 The GIGL provided the following ecological information for the site and a 1km radius:

- Statutory and non-statutory sites
- Protected and other notable species

3.1.2 See Appendix B for summary of ecological data search records.

3.1.3 The full list of protected and notable species identified from the data search was analysed, and the relevant issues have been detailed below. It should be noted that although the information provided by the local record centre is based on current records, it does not represent an exhaustive list of all records.

International/National Protected Sites

3.1.4 The desktop study confirmed that there are no European or National statutory designations within a 1km radius of Norman Shaw North.

Local Nature Reserves

3.1.5 The desktop study confirmed that there are no Local Nature Reserves within a 1km radius of Norman Shaw North.

Sites of Importance for Nature Conservation

3.1.6 The desktop study confirmed that there are no Sites of Importance for Nature Conservation (SINC) within the Northern Estate Site. There are, however, ten SINCs within a 1km of Norman Shaw North:

Metropolitan Importance

- River Thames and Tidal Tributaries, approximately 50m east of the site.
- St James's Park, Green Park and Buckingham Palace Gardens, approximately 280m west of the site.

Borough Importance

- Lambeth Palace Gardens and the Museum of Garden History, approximately 665m south-east of the site.

Borough Grade I

- Westminster Abbey, Great Cloister and College Garden, approximately 220m south-west of the site.
- Marlborough House Garden, approximately 700m north-west of the site.

Local Importance

- Victoria Embankment Gardens: Whitehall Garden, approximately 220m north of the site.
- Victoria Embankment Gardens: Main Garden, approximately 540m north of the site.
- Archbishop's Park, approximately 650m south-east of the site.
- St John's Gardens, Westminster, approximately 710m south of the site.
- St James's Square, approximately, 750m north-west of the site.

Protected Species

3.1.7 The following results are of protected species recorded within a 1km radius of Norman Shaw North:

Bats

3.1.8 GiGL provided 160 bat records within a 1km radius of Norman Shaw North. See table 3.1 for details.

Table 3.1 Summary of GiGL bat records			
Species	Breeding Records	General Records	Closest Record
Serotine (<i>Eptesicus serotinus</i>)	0	2	- The closest record is 712m north of the site
Noctule species (<i>Nyctalus</i> sp.)	0	2	- The closest record is 680m south-west of the site.
Noctule bat (<i>Nyctalus noctula</i>)	0	1	- The closest record is 590m west of the site.
Pipistrelle species (<i>Pipistrellus</i> sp.)	0	13	- The closest record is 393m west of the site.
Nathusius' pipistrelle (<i>Pipistrellus nathusii</i>)	0	6	- The closest record is 377m west of the site.
Common pipistrelle (<i>Pipistrellus pipistrellus</i>)	0	108	- The closest record is 275m west of the site.
Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>)	0	16	- The closest record is 391m west of the site.
Long-eared bat (<i>Plecotus</i> sp.)	0	4	- The closest record is 352m north of the site.
Bat species (<i>Vespertilionidae</i>)	0	8	- The closest record is 393m west of the site.

3.1.9 London Bat Group provided 63 bat records within a 1km radius of Norman Shaw North. See table 3.2 for details.

Table 3.2 Summary of London Bat Group records		
Species	Records	Closest Record
Serotine (<i>Eptesicus serotinus</i>)	1	- The record is from York Road, SE, approximately 690m east of the site.
Noctule species (<i>Nyctalus</i> sp.)	1	- The record is from St. James's Park Tube, approximately 595m south-west of the site.
Noctule bat (<i>Nyctalus noctula</i>)	1	- The record is from Albany House, St James's Park, approximately 580m west of the site.
Pipistrelle species (<i>Pipistrellus</i> sp.)	7	- The closest record is from St. James's Park Lake, approximately 375m west of the site.
Nathusius' pipistrelle (<i>Pipistrellus nathusii</i>)	4	- The closest record is from St. James's Park Lake, approximately 375m west of the site.
Common pipistrelle (<i>Pipistrellus pipistrellus</i>)	39	- The closest record is from St. James's Park Lake, approximately 300m west of the site.
Long-eared bat (<i>Plecotus</i> sp.)	2	- The closest record is from Little Cloisters Gardens, Westminster Abbey, Approximately 350m south-west of the site.
Bat species (<i>Vespertilionidae</i>)	8	- The closest record is from St. James's Park Lake, approximately 375m west of the site.

Birds

3.1.10 The local record centre provided numerous bird records within a 1km radius of Norman Shaw North, including species which commonly nest in habitats which are present within and immediately surrounding the site, such as house sparrow (*Passer domesticus*) and dunnock (*Prunella modularis*).

3.2 Site Survey

Habitat Description

- 3.2.1 The Northern Estate Site, surrounding Norman Shaw North comprises buildings, hardstanding amenity grassland, introduced shrub and scattered trees. Please see Appendix C for Phase 1 Habitat map.

Protected Species

Bats

- 3.2.2 Throughout the year, all British bat species (notably pipistrelle bats which have been recorded within 1km of the Northern Estate Site) use buildings or trees to roost, favouring areas that tend to be dark, sheltered and undisturbed.
- 3.2.3 Norman Shaw North may provide roosting potential for bats, in particular, pipistrelle species which favour crevice roosting locations within buildings such as behind barge boards/soffits and fascias/hanging tiles, within loose mortar between bricks, and under roof and ridge tiles/roofing felt.

Habitat Suitability

- 3.2.4 The Site is predominately surrounded by buildings and hardstanding, with small pockets of green space and scattered trees also present. The green space and scattered tree habitats would support small numbers of foraging bats. In the wider landscape the River Thames and St James' Park offer good foraging habitat for bats.

Preliminary Roost Assessment

- 3.2.5 Norman Shaw North (ref. plates 1-2) is a Grade I listed building constructed between 1888-1890. The square building with a central courtyard has six floors not including basement accommodation.
- 3.2.6 The external walls comprise red brick and Portland stone banding. The pitched roofs have a slate covering (ref. plate 3) there are also some flat roof elements which have a lead covering. The timber dormers (ref. plate 4) have a lead roof and walls. There are four conical roofs on a cylindrical turret (ref. plate 5) on each of the corners of the building.
- 3.2.7 The eastern and western roofs were accessible (ref. plate 6), both approximately 8m wide by 35m long by 3m high (at apex). In both roof spaces sarking boards have been laid onto the timber roof frame (ref. plate 7) and it was not possible to examine the roofing membrane of roof covering. There are large roof lights (ref. plate 8) in both of the roof spaces. The northern and southern roofs were not accessible.
- 3.2.8 Norman Shaw North is identified as having low suitability to support roosting bats.

Emergence/Re-entry Surveys

3.2.9 The results of the presence/absence survey are as follows:

Table 3.6. Norman Shaw North dawn survey 08/06/2019				
Sunrise Time	Surveyors	Start and end times	Equipment used	Weather
04:45	- Anthony Nickson - Richard Lowe - Aiden Pickering - Rosemarie Pickering	03:00-05:00	- 4 no. anabat scout (Zero Crossing)	- 16.0°C (dusk temp) - 13.0°C (start temp) - 12.0°C (end temp) - Dry (precipitation) - 2-3 (beaufort scale)
<u>Notes</u> - No bats were observed re-entering/emerging the Norman Shaw North building during the survey. - A single common pipistrelle bat contact was recorded at 03:35 from the north-west corner of the building (TQ3023679841). The bat was heard but not seen.				

Birds

3.2.10 The roof and window ledges of the building provides nesting habitat for breeding birds, particularly feral pigeons which were recorded during the site survey.

4 Evaluation

4.1 Desktop Study

International/National Protected Sites

- 4.1.1 The desktop study confirmed that there are no European or National statutory designation within a 1km radius of the Northern Estate Site.

Regional/Local Protected Sites

- 4.1.2 The desktop study confirmed that there are no Local Nature Reserves within a 1km radius of Norman Shaw North.
- 4.1.3 The desktop study confirmed that there were no Sites of Importance for Nature Conservation (SINC) within site. There are, however, a number of SINC within a 1km of Norman Shaw North, the closest is the River Thames and Tidal Tributaries, approximately 50m east of the Site.
- 4.1.4 The habitats present within the site are of low value to the SINC in the wider landscape. The Northern Estate Site is separated from the River Thames and Tidal Tributaries (closest SINC) by Victoria Embankment (A3211), an appropriate barrier considering the low level of impact creating as part of the Proposed Development.
- 4.1.5 There are no other SINC in close proximity. As such the Proposed Development will have a negligible impact on the qualifying features of the SINC and no further assessment of the impacts of the project on the SINC is required.

4.2 Site Survey

Habitats

- 4.2.1 The Phase 1 Habitats present within the Northern Estate Site are common throughout the UK. No nationally rare or locally rare plant species were located during the Habitat Survey (Preston et al, 2002).

Protected Species

Bats

- 4.2.2 No evidence of a bat roost was identified within Norman Shaw North during the preliminary roost assessment and nocturnal emergence/re-entry surveys.

Birds

- 4.2.3 The Norman Shaw North building, in particular roof and window ledges provide suitable nesting habitat for breeding birds during the nesting season.

5 Recommendations

Bats

- 5.1.1 No evidence of a bat roost was recorded within Norman Shaw North during the preliminary bat surveys and no bats were observed emerging and/or re-entering the building during the dawn re-entry survey undertaken on 08 June 2019.
- 5.1.2 The survey information suggests that Norman Shaw North does not currently support roosting bats.
- 5.1.3 The proposed refurbishment and reconfiguration of Norman Shaw North should proceed as the survey information suggests there should be no significant concerns or constraints in relation to roosting bats in respect to the proposals and therefore no requirement for an EPSM licence in respect of bats.
- 5.1.4 It should be noted that bat absence is very difficult to prove definitively due to their mobility and size, and single or small numbers of bats are able to roost in extremely small spaces, such as between roofing tiles. Therefore it is recommended that all removal of roof tiles, ridge tiles and wooden soffits, fascia's and barge boards is to be undertaken by hand, with the features lifted instead of dragged.
- 5.1.5 If during development works a bat, or an accumulation of bat droppings is discovered at any time, work is to temporarily cease whilst a bat ecologist is contacted for guidance and assistance. This can be BDP (020 7812 8000) who undertook the initial survey, any licensed bat worker, or the Bat Conservation Trust (BCT) helpline (0845 1300 228).
- 5.1.6 The results of the surveys are valid for a period of 2 years from completion of the nocturnal surveys.

Birds

- 5.1.7 All bird species are protected at their nest under the Wildlife and Countryside Act 1981. Due to presence of suitable habitat for breeding birds in the building, it is recommended that site works that will impact any of these habitats takes place outside the peak bird breeding season (March to September).
- 5.1.8 If site works to these habitats are to be undertaken within the nesting season, then an appropriately qualified ecologist will be required to undertake a site walkover to visually assess potentially suitable nesting habitat for active nests. If active nests are discovered, then site works must cease until the nest is deemed inactive by a qualified ecologist.

6 References

- An Ecological Data Search for Northern Estate Programme [11948], GIGL, 24 April 2018
- Bat record search of a 1 km radius centred on TQ3024179785 London Bat Group, 23 April 2018
- Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd Edition, Bat Conservation Trust, 2016
- Countryside and Wildlife Act, 1981
- EU Habitats Directive, 1994
- Institute of Environmental Assessment's 'Guidelines for Baseline Ecological Assessment', 1997
- National Planning Policy Framework, Department for Communities and Local Government, 27 March 2012
- New Atlas of the British and Irish Flora. Oxford University Press, Preston, C.D., Pearman, D. & Dines, T. 2002
- New Flora of the British Isles, 3rd Ed., Cambridge University Press, Stace, 2010
- Phase 1 Habitat Survey – a technique for environmental audit, JNCC, Updated 2007

Appendix A - Planning Policies

National Planning Policy Framework, February 2019

15. Conserving and enhancing the natural environment

170. Planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
171. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁵³; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
172. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
173. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 172), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Habitats and biodiversity

174. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

175. When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

176. The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites⁵⁹; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

177. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

The London Plan 2021

Policy G1 Green infrastructure

- A. London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.
- B. Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.
- C. Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:
 - 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.
- D. Development proposals should incorporate appropriate elements of green infrastructure infrastructure that are integrated into London's wider green infrastructure network.

Policy G5 Urban greening

- A. 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.
- B. 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).
- C. 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

- A. Sites of Importance for Nature Conservation (SINCs) should be protected.
- B. Boroughs, in developing Development Plans, should:
 - 1. use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
 - 2. 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
 - 3. 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
 - 4. seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
 - 5. ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.
- C. 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:
 - 1. avoid damaging the significant ecological features of the site
 - 2. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
 - 3. deliver off-site compensation of better biodiversity value.
- D. 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.
- E. Proposals which reduce deficiencies in access to nature should be considered positively.

Policy G7 Trees and woodlands

- A. 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.
- B. In their Development Plans, boroughs should:
 - 1. protect 'veteran' trees and ancient woodland where these are not already part of a protected site
 - 2. identify opportunities for tree planting in strategic locations.
- C. Development proposals should ensure that, wherever possible, existing trees of value are retained. 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.

Westminster City Plan, November 2016

POLICY S38 BIODIVERSITY AND GREEN INFRASTRUCTURE

Biodiversity and green infrastructure will be protected and enhanced throughout Westminster and opportunities to extend and create new wildlife habitat as part of development will be maximised.

Proposals within Areas of Wildlife Deficiency should include features to enhance biodiversity, particularly for priority species and habitat.

Where developments would impact on species or habitat, especially where identified in the relevant Biodiversity Action Plan at national, regional or local level, the potential harm should firstly be avoided, secondly be mitigated, or finally appropriate compensation will be sought. Where harm cannot be prevented, sufficiently mitigated against or adequately compensated for, permission will be refused.

Reasoned Justification

This approach responds to the need to protect all aspects of the natural environment and to provide for animal and plant species and their interconnected ecosystems.

Improving biodiversity and providing and protecting habitats increases the resilience of ecosystems and helps the physical environment to change and adapt to different stresses, and will be crucial in adapting to the effects of climate change.

Provision of private spaces, roof terraces, balconies, and living roofs and walls can also make a contribution to green infrastructure. Utilising opportunities to enhance biodiversity is important throughout Westminster, particularly in the Areas of Wildlife Deficiency.

Decreasing the areas deficient in wildlife helps to develop the network of wildlife habitat across Westminster, and contributes to the social and personal well-being of people living in those areas.

The specific protection of species and habitats identified in relevant Biodiversity Action Plans will help prevent the decline of, and improve conditions for, those species and habitats that are a conservation priority.

Saved Westminster Unitary Development Plan Policies, January 2007

POLICY ENV 2: ENVIRONMENTAL APPRAISAL

In considering planning applications:

- (A) All applicants will be expected to complete those parts of the Environmental Performance Statement applicable to their proposals.
- (B) The City Council will require use of Environmental Impact Assessments (EIA), for those developments that meet the Government's Schedule 1 criteria and for those Schedule 2 criteria that the City Council determines are likely to have significant environmental effects. Applicants should refer to the Regulations and paragraph 9.20 below for the types of proposal likely to require an EIA.

POLICY ENV 4: PLANTING AROUND AND ON BUILDINGS

- (A) The landscaping of forecourts, walls, entrance areas and grounds will be encouraged, where appropriate.
- (B) Planting on flat surfaces and roofs on buildings will be encouraged subject to the need to maintain the amenities and the privacy of neighbouring occupiers, conservation area and listed buildings policies, and ensuring that views out of the Royal Parks are not compromised.

POLICY ENV 17: NATURE CONSERVATION AND BIODIVERSITY

- (A) Developers must take measures to ensure that protected species and their habitats are not harmed.
- (B) The City Council will protect and seek to enhance areas of designated nature conservation value and green corridors shown on Map 9.2 and the Proposals Map. Development likely to have an adverse effect on a Local Nature Reserve, or a Site of Importance for Nature Conservation, or a green corridor will not be approved unless it can be demonstrated that there are reasons for the proposal that outweigh the need to safeguard the nature conservation value of the site. If such development is approved, mitigation will be required.
- (C) The City Council will welcome proposals that will enhance the potential for increasing habitat and wildlife in the areas of wildlife deficiency.
- (D) Developers will have to demonstrate that their proposals would either preserve or enhance the habitats and species protected in the Westminster and the National and London Biodiversity Action Plans.
- (E) The City Council will encourage:
 - 1) Landowners to plant and manage green spaces in ways that conserve and enhance wildlife value, and in particular plant native species of local provenance.
 - 2) The retention of green spaces that provide wildlife corridors, such as planted rear gardens.
 - 3) The provision in new developments of features for wildlife and to promote local biodiversity.

Draft City Plan 2019-2040, June 2019

35. GREEN INFRASTRUCTURE

- A. The council will protect and enhance the city's green infrastructure to maximise its environmental, social and economic value.

City Greening

- B. Developments will, wherever possible, contribute to the greening of Westminster by incorporating trees, green walls, green roofs, rain gardens and other green features and spaces into the design of the scheme.

Open Space

- C. All open spaces and their quality, heritage and ecological value, tranquillity and amenity will be protected.
- D. Major developments will be required to provide new or improved public open space and space for children's active play, particularly in areas of open space or play space deficiency.
- E. Development affecting the Royal Parks should enhance their quality and range of uses.

Biodiversity and Access to Nature

- F. Sites of Importance for Natural Conservation (SINCs), priority habitats and other ecological features outside of the SINCs network will be protected.
- G. Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. Developments within areas of nature deficiency should include features to enhance biodiversity, particularly for priority species and habitats.

Trees

- H. Trees of amenity, ecological and historic value and those which contribute to the character and appearance of the townscape will be protected.
- I. The planting of trees to optimise the city's canopy cover will be encouraged in new developments.

Appendix B - Ecological Data Search



Greenspace Information for Greater London CIC
the capital's environmental records centre

An Ecological Data Search for NEP

On behalf of
BDP

Report reference 11948



Prepared on 24 Apr 2018
by eCountability Ltd.
enquiries@eCountability.co.uk



Bat records as requested by Anthony Nickson, BDP Ltd

Records within a circle of 1 km radius centred on TQ 30241 79785

By e-mail only

23 April 2018

Our reference: 2018-037

Bat roosts

There are no known roosts

Casualty records (may relate to roosts)

24/07/2012
27/02/2012
07/07/2007

Pipistrellus pipistrellus
Pipistrellus pipistrellus
Pipistrellus pipistrellus

Field records

06/07/2016
02/10/2014
15/08/2014
11/07/2014
08/07/2014
07/07/2014
06/07/2014
04/07/2014
04/07/2014
21/09/2013
21/09/2013
21/09/2013
June 2012
July 2011
July 2011
July 2011
August 2010
31/07/2010
19/05/2008
19/05/2008
19/05/2008
19/05/2008
11/10/2005
27/10/2000
11/11/1998
16/08/1998
16/08/1998

Vespertilionidae
Pipistrellus pipistrellus
Pipistrellus pipistrellus
Vespertilionidae
Vespertilionidae
Pipistrellus pipistrellus
Vespertilionidae
Pipistrellus pipistrellus
Vespertilionidae
Pipistrellus pipistrellus
Pipistrellus pipistrellus
Pipistrellus
Pipistrellus pipistrellus
Pipistrellus nathusii
Pipistrellus pipistrellus
Nyctalus noctula
Nyctalus
Pipistrellus pipistrellus
Pipistrellus pipistrellus
Plecotus
Pipistrellus pipistrellus
Plecotus
Pipistrellus nathusii
Pipistrellus pipistrellus
Vespertilionidae
Pipistrellus pipistrellus
Pipistrellus pygmaeus

16/08/1998		Pipistrellus
16/08/1998		Pipistrellus
16/08/1998		Pipistrellus pipistrellus
16/08/1998		Pipistrellus pipistrellus
16/08/1998		Pipistrellus pygmaeus
16/08/1998		Vespertilionidae
16/08/1998		Pipistrellus
16/08/1998		Pipistrellus pygmaeus
16/08/1998		Pipistrellus pipistrellus
16/08/1998		Pipistrellus pipistrellus
16/08/1998		Vespertilionidae
16/08/1998		Pipistrellus pipistrellus
28/07/1998		Pipistrellus pipistrellus
28/07/1998		Pipistrellus pipistrellus
28/07/1998		Pipistrellus
28/07/1998		Pipistrellus pipistrellus
28/07/1998		Pipistrellus pipistrellus
28/07/1998		Pipistrellus pipistrellus
28/07/1998		Pipistrellus
24/06/1998		Pipistrellus pipistrellus
24/06/1998		Pipistrellus pipistrellus
24/06/1998		Pipistrellus pygmaeus
24/06/1998		Pipistrellus pipistrellus
24/06/1998		Pipistrellus
24/06/1998		Pipistrellus pipistrellus
24/06/1998		Pipistrellus pipistrellus
24/06/1998		Pipistrellus pygmaeus
24/06/1998		Pipistrellus pipistrellus
24/06/1998		Pipistrellus pipistrellus
24/06/1998		Pipistrellus pygmaeus
27/05/1992		Eptesicus serotinus

NBMP Nathusius' Pipistrelle Surveys

24/09/2009		Pipistrellus nathusii
13/09/2009		Pipistrellus nathusii

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The information provided here is believed to be correct. However, no responsibility can be accepted by the London Bat Group or any of its partners or officers for any consequences of errors or omissions, nor responsibility for loss occasioned to any person acting or refraining from action as a result of this information and no claims for compensation for damage or negligence will be accepted.

The records held by the London Bat Group are not the result of systematic survey, so the absence of data for any particular site or area cannot be taken to indicate that bats are not present or use it as a place of shelter. The London Bat Group advises that before any work starts a competent surveyor should check any site, building or tree on which any work is planned, to reduce the risk of harming bats.

Appendix C - Phase 1 Habitat Map



BDP SHALL HAVE NO RESPONSIBILITY FOR ANY USE MADE OF THIS DOCUMENT OTHER THAN FOR THAT WHICH IT WAS PREPARED AND ISSUED.
 ALL DIMENSIONS SHOULD BE CHECKED ON SITE.
 DO NOT SCALE FROM THIS DRAWING.
 ANY DRAWING ERRORS OR DIVERGENCES SHOULD BE BROUGHT TO THE ATTENTION OF BUILDING DESIGN PARTNERSHIP AT THE ADDRESS SHOWN BELOW

Legend

- Amenity grassland
- Buildings
- Hardstanding
- Introduced shrub
- Scattered trees

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PROJECT Northern Estate	
DRAWING TITLE Phase 1 Habitat Map	DATE 18.09.19
JOB NUMBER P2007656	

Appendix D - Photograph Plates



Plate 1. Norman Shaw North (south-east elevation)



Plate 2. NSN (north-west elevation)



Plate 3. NSN slate roof covering



Plate 4. NSN flat roof covering

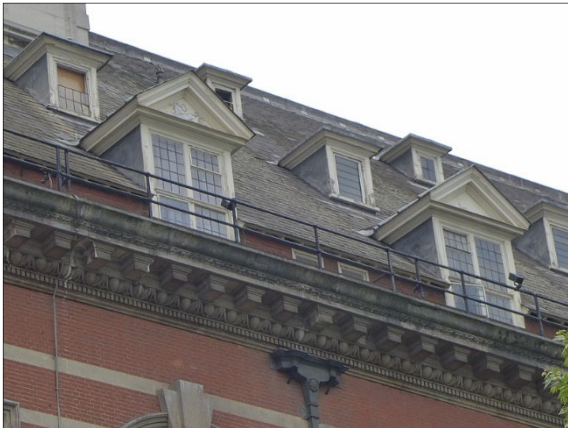


Plate 5. NSN dormers



Plate 6. NSN conical roof on a cylindrical turret



Plate 7. NSN internal roof space



Plate 8. NSN internal roof space