

WILLOW WAY, SYDENHAM, LONDON

PRELIMINARY ECOLOGICAL APPRAISAL

Final Document

December 2022

Preliminary Ecological Appraisals • Protected Species Surveys and Licensing • NVC • EclA • HRA • Management Plans
Habitats • Badger • Bats • Hazel Dormouse • Birds • Reptiles • Amphibians • Invertebrates • Riparian and Aquatic Species



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ECOSA Quality Assurance Record

The Preliminary Ecological Appraisal has been undertaken with reference to the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017). This report has been produced in accordance with the CIEEM Guidelines for Ecological Report Writing 2017 (CIEEM, 2017). The survey work has been undertaken in line with references within CIEEM's Source of Survey Guidance (CIEEM, 2017).

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WILLOW WAY, SYDENHAM, LONDON

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EXECUTIVE SUMMARY

Ecological Survey and Assessment Ltd (ECOSA) have been appointed by Kitewood Estates Limited to undertake a Preliminary Ecological Appraisal of Willow Way, London. The purpose of the appraisal is to assess the site's ecological baseline and identify constraints and opportunities associated with development at the site, to inform a future planning application. The site is located in Sydenham, London and comprises a complex of buildings used for different businesses with associated hardstanding. The development will entail the demolition of the existing buildings and construction of a part 4 / part 5 / part 6 storey mixed-use building with 924 metres squared of commercial floorspace at ground and mezzanine levels and 60 residential units above.

The main findings of the Preliminary Ecological Appraisal are:

- The site is within one kilometre of two designated sites Dacres Wood LNR and Fern Bank LNR
- The site has been assessed as supporting common and widespread habitats
- The site has been assessed as having suitability to support roosting bats and breeding birds.
- Recommendations have been made for further surveys in respect of roosting bats. A range of initial recommendations have been made in respect of mitigating/compensating potential impacts as a result of the scheme such as sensitive timings of works and opportunities for enhancement have been identified in relation to birds including the installation of boxes. These recommendations may need to be changed depending on the results of the further survey work and the results of the biological records centre request.
- If the planning application boundary changes or the proposals for the site alter, a re-assessment of the scheme in relation to ecology may be required. Given the mobility of animals and the potential for colonisation of the site over time, updating survey work may be required, particularly if development does not commence within 18 months of the date of the most recent relevant survey.

1.0 INTRODUCTION

1.1 Background

Ecological Survey & Assessment Limited (ECOSA) have been appointed by Kitewood Estates Limited (hereafter referred to as Kitewood) to undertake a Preliminary Ecological Appraisal to identify the ecological constraints and opportunities associated with the redevelopment of Willow Way, Sydenham, London, SE26 4QP (hereafter referred to as the site).

1.2 The Site

The site is located in Sydenham, London, centred on National Grid Reference (NGR) TQ 3505 7214 (**Map 1**). The Phase 1 habitat map (**Map 2**) depicts the boundary of the site.

The site consists of hardstanding and buildings with some scattered trees. The buildings are used for commercial purposes including a catering company and a car mechanic. The site is bound on the eastern and southern boundaries by a line of trees, beyond which is urban development. The road Willow Way bounds the site to the west. Further urban development bounds the site to the north.

Within the wider landscape there is an expanse of urban/residential development in all directions with pockets of green space. A train line is located approximately 70 metres to the east of the site. The local nature reserve Dacres Wood is located approximately 455 metres to the east of the site. The A205 is located approximately 820 metres north of the site. Located approximately 620 metres to the north is Sydenham Hill wood which connects with a golf course to the north-west.

1.3 Aims and Scope of Report

The information within this report is based on a field survey and desktop study carried out during November and December 2022. The objectives of the appraisal are:

- To provide preliminary baseline information on the current habitats, the suitability of the site to support notable and protected species, and evidence of notable and protected species both on site and in the immediate vicinity of the site, where relevant;
- To identify the proximity of any sites designated for nature conservation importance;
- To identify the likely ecological constraints associated with the proposals;

- To identify any mitigation measures likely to be required, following the 'Mitigation Hierarchy'¹;
- To identify any additional surveys that may be required to inform an Ecological Impact Assessment (EclA); and
- To identify the opportunities offered by the proposals to deliver ecological enhancement

1.4 Site Proposals

The development will entail the demolition of the existing buildings and redevelopment to provide employment floorspace (Use classes E(g)(i)(ii)(iii)) and residential dwellings including affordable housing and amenity space.

The appraisal made reference to an initial proposals plan produced by DC Architecture+Design Ltd, dated 14th December 2022 (Drawing No. KTW034-DCR-GF-PL-A-0100) (**Appendix 1**).

It is anticipated that planning permission will be sought during December 2022 with construction commencing soon after permission has been granted.

¹ In accordance with CIEEM Ecological Impact Assessment guidance (CIEEM, 2018) a sequential process is adopted to address impacts on features of ecological interest, with 'Avoidance' prioritised at the top of the hierarchy and Compensation/Enhancement' at the bottom. This is often referred to as the 'mitigation hierarchy'.

2.0 PLANNING POLICY CONTEXT

2.1 Introduction

This section summarises the planning policy in relation to ecology and biodiversity within the London Borough of Lewisham administrative area. This information is then used to make necessary make recommendations for mitigation and enhancements in order to ensure any future planning application accords with relevant planning policy.

2.2 Planning Policy

2.2.1 National Policy

The National Planning Policy Framework (NPPF) sets out the government's requirements for the planning system in England. The original document was published in 2012 with the most recent revised NPPF published in July 2021. A number of sections of the NPPF are relevant when taking into account development proposals and the environment. As set out within Paragraph 11 of the NPPF "*Plans and decisions should apply a presumption in favour of sustainable development*". However, Paragraph 182 goes on to state that "*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 NPPF sets out that development proposals should not only minimise the impacts on biodiversity but also to provide enhancement. Paragraph 174 states that the planning system should contribute to and enhance the natural environment by "*...minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures...*".

A number of principles are set out in Paragraph 180, including that where harm cannot be adequately avoided then it should be mitigated for, or as a last resort, compensated for. Where impacts occur on nationally designated sites, the benefits must clearly outweigh any adverse impact and incorporating biodiversity in and around developments should be encouraged. Specific reference is also made to the protection of irreplaceable habitats², including ancient woodland³. Where loss to irreplaceable habitats occurs planning permission would normally be refused unless there are wholly

² The NPPF defines irreplaceable habitats as "*Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.*"

³ Natural England defines ancient woodland as "An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS)."

exceptional reasons and an adequate compensation strategy is in place. Paragraph 180 also states “*development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.*”. Paragraph 181 also sets out that potential SPAs, SACs and listed or proposed Ramsar sites or sites acting as compensation for SPAs, SACs and Ramsar sites, should receive the same protection as habitat sites.

In addition to the NPPF, Circular 06/05 provides guidance on the application of the law relating to planning and nature conservation as it applies in England. Paragraph 98 states “*the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat*”. Paragraph 99 states “*it is essential that the presence or otherwise of a protected species, and the extent that they may be affected by the Proposed Project Development, is established before planning permission is granted*”.

2.2.2 Local Policy

Local planning policy within London Borough of Lewisham is outlined within the Core Strategy adopted in June 2011. A single policy relate to biodiversity:

- **Policy 12 (Core Strategy) - Open space and environmental assets**
This policy states that the Council will seek to preserve or enhance the local biodiversity interests in accordance with national and regional policy.

The Mayor of London’s London Plan (2021) is the overall strategic plan for London and will also be used to inform planning decisions. One policy in particular addresses biodiversity and ecology, **Policy G6 Biodiversity and access to nature**, which states:

Development Proposals should:

- a. wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity
- b. prioritise assisting in achieving targets in biodiversity action plans (BAPs) and/or improving access to nature in areas deficient in accessible wildlife sites
- c. not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a

protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.

On Sites of Importance for Nature Conservation development proposals should:

- a. give the highest protection to sites with existing or proposed international designations (SACs, SPAs, Ramsar sites) and national designations (SSSIs, NNRs) in line with the relevant EU and UK guidance and regulations
- b. give strong protection to sites of metropolitan importance for nature conservation (SMLs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance
- c. give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.

When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:

- 1 avoid adverse impact to the biodiversity interest
- 2 minimize impact and seek mitigation
- 3 only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.

Nine other policies within the London Plan refer to biodiversity and ecology, these are: **GG2 - Making the best use of land, Policy SD2 - Collaboration in the Wider South East, Policy D8 - Public realm, Policy S5 - Sports and recreation facilities, Policy G7 - Trees and woodlands, Policy G1 - Green infrastructure, Policy SI10 - Aggregates, Policy SI13 - Sustainable drainage and Policy SI17 - Protecting and enhancing London's waterways.**

3.0 METHODS

3.1 Introduction

This section details the methods employed during the Preliminary Ecological Appraisal. Any significant limitations to the survey methods are also considered.

3.2 Zone of Influence

To define the total extent of the study area for this appraisal (Zone of Influence⁴), the proposed scheme was reviewed to establish the spatial scale at which ecological features could be affected. The appropriate survey radii for the various elements of the appraisal (i.e. desktop study and field survey) have been defined in the relevant sections below. These distances are determined based on the professional judgement of the ecologist leading the appraisal, taking into account the characteristics of the site subject to appraisal, its surroundings and the nature and scope of the proposals (if known when the appraisal was undertaken). Determination of the Zone of Influence is an iterative process and will be regularly reviewed and amended as the project evolves.

3.3 Scoping

Protected species considered within this appraisal are those species/species groups considered likely to be encountered given the geographical location and context of the site. These are discussed within the results section (Section 4.0) of the current report. Where such a species is unlikely to be present on site a justification for likely absence is provided. Species considered likely absent from the site are not then considered in the potential ecological constraints and mitigation measures section (Section 5.0) of this report.

3.4 Desk Study

3.4.1 Biological Records Centre

Greenspace Information for Greater London (GIGL) was consulted on the 1st December 2022 for the following data:

- Records of non-statutory designated sites (Sites of Importance for Nature Conservation (SINCs)) within one kilometre of the site boundary; and
- Records of legally protected and notable species (flora and fauna) within one kilometre of the site boundary, including Species of Principal Importance for the Conservation of diversity in England notified under Section 41 of the Natural

⁴ The Zone of Influence, as defined by CIEEM, is the area over which ecological features may be subject to significant effects as a result of the proposed project and associated activities.

Environment and Rural Communities (NERC) Act 2006 and as listed in the England Biodiversity List (**Appendix 5**); and

- Records of bats within two kilometres of the site boundary. Bat species are highly mobile and therefore the search radius is increased for this species group.

A full biological record centre desktop study was undertaken as part of this appraisal. The data has been requested but not been returned at the time of writing this report

3.4.2 Multi-Agency Geographic Information for the Countryside

The Multi-Agency Geographic Information for the Countryside (MAGIC) database (DEFRA, 2022) was reviewed on 1st December 2022 to establish the location of statutory designated sites located within the vicinity of the site. This included a search for all internationally and nationally designated sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Wetlands of International Importance (Ramsar sites), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) and Local Nature Reserves (LNRs) within one kilometre of the site. Where appropriate, the desk study search area has been extended to take account of any appropriate statutory designated sites which need consideration in terms of potential in-direct effects and which support particularly mobile species, particularly those specifically mentioned in local planning policy. The Impact Risk Zones (IRZ) were also obtained from MAGIC, which are used to help guide and assess planning applications for likely effects on SSSIs.

Sites within two kilometres of the site boundary where European Protected Species Mitigation (EPSM) licences have been granted were reviewed. This information allows a greater understanding of the potential for European protected species to be present in the local area.

3.4.3 Other Sources of Information

Online mapping resources, at an appropriate scale, were used to identify the presence of habitats such as woodland blocks, ponds, watercourses and hedgerows, in the vicinity of the site. These habitats may offer resources and connectivity between the site and suitable habitat in the local area, which may be exploited by local species populations.

The presence of ponds or other waterbodies within a 500 metre radius of the site in particular are noted in relation to great crested newt. The 500 metre radius is a standardised search radius to assist in the assessment of the suitability of a site and its surrounding habitat to support this species, based on current Natural England guidance (English Nature, 2001).

3.5 Field Survey

The field survey broadly followed standard Phase 1 habitat survey methodology (JNCC, 2010) and comprised/included a search for evidence of, and an assessment of the site's suitability to support, protected and notable species as recommended by CIEEM (CIEEM, 2017). The field survey covered all accessible areas of the site, including boundary features. Habitats described in Section 4.0, have been mapped (**Map 2**) and photographs provided, where relevant.

3.5.1 Phase 1 Habitat Survey

An assessment was made of all areas of vegetation within the site based on the standardised Phase 1 habitat survey methodology (JNCC, 2010). This involved identification of broad vegetation types, which were then classified against Phase 1 habitat types, where appropriate. A list of characteristic plant species for each vegetation type was compiled and any invasive species⁵ encountered as an incidental result of the survey recorded.

3.5.2 Protected and Notable Species Appraisal

A preliminary appraisal of the site's suitability to support legally protected and notable species was carried out. The following species/species groups were considered during the appraisal.

Bats

The survey conformed to current Bat Conservation Trust guidelines (Collins, 2016). An assessment was made of the suitability of buildings and trees on the site and immediately on the site boundary to support roosting bats based on the presence of Potential Roosting Features such as loose or missing roof tiles or lifted lead flashing for buildings and holes, cracks, splits, loose bark and ivy cladding for trees. A detailed external and internal inspection of accessible structures was undertaken to compile information on potential and actual bat entry/exit points; potential and actual bat roosting locations; any evidence of bats found.

An assessment was made of the suitability of the site and the surrounding landscape to support foraging and/or commuting bat species. The assessment of the suitability of the site to support roosting, foraging and commuting bats is based on a four-point scale as detailed in **Appendix 4**.

Otter

The otter appraisal was based on an assessment of the suitability of the habitat present within the site to support otter by reference to habitat type (such as rivers, streams,

⁵ Plant species included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). The survey was not specifically aimed at assessing the presence of these species and further specialist advice may need to be sought.

ditches, wetlands, reed beds, lakes, ponds and reservoirs), proximity of the site to freshwater and potential important feeding resources (such as fisheries), presence of habitat features which could provide opportunities for resting places and/or holts (such as tunnels, hollows at the base of trees and presence of dense, undisturbed habitat). During the survey attention was paid to the presence of evidence such as spraints, feeding remains, footprints and slides.

Badger

The survey involved an assessment of the suitability of the site to support badger. Evidence of the species was recorded as an incidental result of the Phase 1 habitat survey and included locating badger setts, paths, and signs of territorial activity such as latrine sites.

Hazel Dormouse

The appraisal for the suitability of the site to support hazel dormouse was based on an assessment of habitat features that may indicate that the species is present. This includes the presence of key food sources such as hazel and bramble, or plants used as nesting material such as honeysuckle and clematis. Additionally, the species requires a continuum of food supply so that habitat structure, diversity and connectivity to adjacent areas of woodland/scrub are important features in determining the suitability of the site for hazel dormouse.

Water Vole

The water vole appraisal was based on an assessment of the suitability of the habitat present within the site to support water vole by reference to habitat type (such as rivers, streams, ditches, wetlands, reed beds, lakes, ponds and reservoirs), bank structure and the bank side vegetation. Water voles generally require sloping banks in which to burrow and well-developed bank side vegetation to provide shelter and food. During the survey attention was paid to the presence of burrows, latrines, feeding remains, trails and footprints.

Birds

The appraisal of breeding birds on the site was based on the suitability of habitat present to support nesting bird communities, the presence of bird species that may potentially nest within the available habitat and evidence of nesting such as old or currently active nests.

The assessment of wintering birds was based on an assessment of the suitability of the habitat on site to support important wintering bird species and populations. Particular attention was paid to the suitability for the site to support wintering farmland bird species, waders and wildfowl.

Reptiles

The reptile appraisal was based on an assessment of the suitability of the habitat present within the site to support a population of reptiles. Reptiles particularly favour scrub and rough grassland interfaces and the presence of these is a good indication that reptiles may be present on site. In addition, reptiles may utilise features such as bare ground for basking, tussocky grassland for shelter and compost heaps and rubble piles for breeding and/or hibernating.

Great Crested Newt

The appraisal of the site to support great crested newt included establishing the presence of suitable aquatic habitats such as ponds, lakes or other waterbodies within or adjacent to the site and the presence of suitable terrestrial habitat. Waterbodies that are densely shaded, highly eutrophic or that contain fish are likely to be less suitable for this species. The suitability of on-site ponds and terrestrial habitat is considered in relation to the presence of ponds within the wider area, as identified within the desktop study (Paragraph 3.4.3), and their suitability to be used as a network.

Invertebrates

An assessment was made of the suitability of the site to support diverse communities of invertebrates. The assessment was based on the presence of habitat features which may support important invertebrate communities. These features include, for example, an abundance of dead wood, the presence of diverse plant communities, varied woodland structure, sunny woodland edges with a diverse flora, waterbodies and water courses and areas of free draining soil exposures. During the field survey there was no attempt made to identify species present as this is a more specialist area of ecological assessment reserved for targeted surveys.

Other Relevant Species

An assessment was made of site suitability for other notable species such as more rarely encountered protected species, Species of Principal Importance for the Conservation of diversity in England notified under Section 41 of the NERC Act 2006 and as listed in the England Biodiversity List, and Local Biodiversity Action Plan (LBAP) species⁶, specific to the study region.

Invasive Species

During the field survey any incidental records of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were recorded. However, it

⁶ LBAPs identify local priorities for biodiversity conservation by translating national targets for species into effective action at the local level and identifying targets for species important to the local area.

should be considered that the survey was not specifically aimed at assessing the presence of these species and further specialist advice may need to be sought.

3.6 Field Survey Details

The field survey was carried out by Samantha Faggetter, Ecologist of ECOSA on 30th November 2022. The weather conditions were dry with approximately 75-100% cloud cover, an ambient temperature of 8°C and a calm wind.

During the survey, the surveyor was equipped with a ladder, 10x40 binoculars, a high powered torch and a digital camera.

3.7 Limitations

Ecological surveys are limited by factors which affect the presence of plants and animals such as the time of year, migration patterns and behaviour. The field survey has therefore not produced a complete list of plants and animals and in the absence of evidence of any particular species should not be taken as conclusive proof that the species is absent or that it will not occur in the future.

Online mapping resources provide an indication of habitat features present in the wider area, but do not provide a detailed assessment of habitat types.

The survey was undertaken at a time of year when many species of plant and animal are either dormant, not visible above ground or simply not present in the UK (such as migratory birds). Therefore, the survey was based upon an assessment of the habitat present on site and the suitability of this habitat to support protected species.

4.0 BASELINE ECOLOGICAL CONDITIONS

4.1 Introduction

This section details the results of the Preliminary Ecological Appraisal undertaken for the site. It assesses the baseline ecological conditions of the site at the time the desktop study was completed and based on the ecological features recorded during the field survey.

4.2 Statutory and Non-statutory Designated Sites

4.2.1 Statutory Designated Sites

There are two statutory designated sites of nature conservation interest situated within one kilometres of the site boundary. These are:

- Dacres Wood (LNR) – Located approximately 390 kilometres east of the site and designated for supporting Habitat of Principal Importance Lowland Mixed Deciduous Woodland.
- Sydenham Hill Wood and Fern Bank (LNR) – Located approximately 570 metres to the north-west of the site and designated for supporting ancient replanted woodland and Habitat of Principal Lowland Mixed Deciduous Woodland.

Further details of the statutory designations listed above are provided in **Appendix 2**.

4.2.2 Non-Statutory Designated Sites

A full biological record centre desktop study was undertaken as part of this appraisal. The data has been requested but not been returned at the time of writing this report.

4.3 Habitats

4.3.1 Desktop Study Results

Consultation with the MAGIC database produced no records of notable habitats or plant species within or adjacent to the site, however, this does not confirm the absence of notable plants or habitats in the local area.

4.3.2 Field Survey Results

Habitats within the site are shown on the Phase 1 Habitat Map (**Map 2**), and photographs have been provided as appropriate. Habitats are described in general terms using standard Phase 1 habitat survey terminology. The main habitats recorded on site during the Phase 1 habitat survey were as follows:

Scattered Trees

There are five scattered semi-mature trees along the western site boundary (**Figure 1**). The species present include apple *Malus domestica* and palm *Arecaceae* species.



Figure 1: Scattered trees located on the western boundary

Other Habitats

Other habitats include hardstanding, buildings and shipping containers (**Figure 2**). The full details of the building assessment can be found at Paragraph 4.4.1.



Figure 2: Shipping containers located towards the centre of the site.

4.3.3 Summary

The site is dominated by habitats that have negligible ecological value in their own right including buildings and hardstanding. The scattered trees have the relatively highest ecological value within the site – albeit the arboricultural report has assessed them as being of low quality (Southern Beeches Ltd., 2022). The scattered trees are common and widespread within the local area.

4.4 Notable and Legally Protected Species

4.4.1 Bats

Desktop Study Results

Consultation with the MAGIC database produced three records of bats within the desktop study area. These licences covered the destruction of a resting place for common pipistrelle *Pipistrellus pipistrellus* and destruction of a resting and breeding place for Leisler's bat *Nyctalus leisleri*. The closest licence is located approximately one kilometre to the west of the site and was granted in 2015.

Building Assessment

The field survey assessed two buildings as having low suitability for roosting bats due to the presence of potential roosting features and three buildings as negligible for roosting bats. The full results of the building assessment are provided in **Table 1**.




Tree Assessment




All trees at the site are assessed as having negligible suitability to support roosting bats.




Foraging and Commuting Habitat

Along the eastern boundary there is a line of vegetation, that is offsite, which is a suitable linear feature for foraging and commuting bats. There is a lot of light spill onto the site from street lights along Willow Way and security lights within the site. The site is dominated by buildings and hardstanding with very limited vegetated habitats present therefore the site is considered to have negligible suitability to support foraging and commuting bats.

Table 1: Building Assessment – Summary of Features with Bat Roost Potential and Evidence of Bat Roost Activity

Surveyed Feature	Figure	Building Description	Description of Potential Bat Roost Features	Evidence of Bat Roost Activity and Location	Assessment of Suitability for Roosting Bats
B1	 <p>Figure 3: The northern elevation of B1</p>  <p>Figure 4: Hole within the soffit on the southern elevation</p>	B1 is a mixed-use building being used by a catering company and consists of a red brick structure which is a mix of single and two storeys high (Figure 3). The roof is flat and is covered in bitumen felt. The windows are well sealed and have metal bars in front of most of the windows. The soffit is constructed of wood. No loft void is present within the building.	There is a small hole in the soffit on the southern elevation that allows access to a crevice opportunity for one or two bats (Figure 4). There are small areas of missing mortar in the brick work leading to crevice opportunities for individual bats. The lead flashing on the building is lifted in places which provides enough space for a low number of bats to roost.	No evidence of roosting bats was recorded during the survey.	Low suitability
B2	 <p>Figure 5: Western elevation of B2</p>	B2 is a porter cabin used as a tea room by the staff from the catering company (Figure 5). The porter cabin is constructed of a metal frame and composite walls. The roof is flat and no loft void is present.	The building is well sealed and there are no crevices or gaps that bats could use to roost.	No evidence of roosting bats was recorded during the survey.	Negligible suitability

Surveyed Feature	Figure	Building Description	Description of Potential Bat Roost Features	Evidence of Bat Roost Activity and Location	Assessment of Suitability for Roosting Bats
B3	 <p>Figure 6: Southern elevation of B3</p>  <p>Figure 7: Western elevation of B3</p>	<p>B3 is a wooden shed which is used for storage (Figure 6 and Figure 7). The roof is pitched and constructed of a timbre frame. The roof has a bitumen felt cover. There is no loft void present.</p>	<p>The building is well sealed and there are no crevice or gaps that bats could use to roost. The window on the western elevation allows daylight into the internal space making it too light for bats to roost.</p>	<p>No evidence of roosting bats was recorded during the survey.</p>	<p>Negligible suitability</p>
B4	 <p>Figure 8: Western elevation of B1</p>	<p>B4 is a garage that is split into two rooms used for storage (Figure 8 and Figure 9). The building is single storey and constructed of red brick with a flat bitumen felt roof. Internally the room is well sealed and the framework is constructed of metal.</p> <p>On the western elevation there is an up and over metal door. There is also a canopy that is constructed of plastic corrugated sheets and timber framework.</p>	<p>The building is well sealed and there are no crevice or gaps that bats could use to roost.</p>	<p>No evidence of roosting bats was recorded during the survey.</p>	<p>Negligible suitability</p>

Surveyed Feature	Figure	Building Description	Description of Potential Bat Roost Features	Evidence of Bat Roost Activity and Location	Assessment of Suitability for Roosting Bats
	 <p>Figure 9: Internal room showing how the building is used for storage</p>				
B5	 <p>Figure 10: Western elevation of B5</p>  <p>Figure 11: The mono-slope of B6 showing that the bitumen felt is lifted in places.</p>	<p>B5 is an L shaped building part of which is disused and the other half is used as a car mechanics (Figure 10). There was no access to the back of the building and therefore this side could not be assessed.</p> <p>The roof of the front section of the building is flat with bitumen felt and has no loft void. The section of the building that extends to the east has a mono-sloped roof that is open to the apex. The mono-slope has a bitumen felt cover that is showing some wear and tear (Figure 11).</p>	<p>The lead flashing above the metal door is lifted providing a crevice opportunity for one or two bats. The bitumen felt on the mono-slope is lifted in places creating crevice opportunities for a few bats to use as day roosts.</p>	<p>No evidence of roosting bats was recorded during the survey.</p>	<p>Low suitability</p>

4.4.2 Otter

Desktop Study Results

Consultation with the MAGIC database produced no records of granted European protected species mitigation licences in regard to otter *Lutra lutra* within two kilometres of the site boundary, however, this does not confirm the absence of the species in the local area.

A review of aerial imagery and 1:25,000 OS mapping revealed no suitable habitat for otter within the surrounding area.

Field Survey Results

The site does not contain any habitats suitable for otter such as rivers or streams as such the site is assessed as being unsuitable for otter. There are also no suitable habitats adjacent to the site and therefore otter are unlikely to commute through the site. As such otter are not considered further in this report

4.4.3 Badger

Field Survey Results

No evidence of foraging, commuting or resident badger *Meles meles* was recorded on site during the survey. The site does not contain any habitats suitable for supporting foraging, commuting or sett building due to being dominated by hardstanding and buildings. Given there is no evidence of badger at the site and no suitable habitat, this species is not considered further in this report.

4.4.4 Hazel Dormouse

Desktop Study Results

Consultation with the MAGIC database produced no records of granted European protected species mitigation licences for hazel dormouse *Muscardinus avellanarius* within two kilometres of the site boundary, however, this does not confirm the absence of the species in the local area.

Field Survey Results

The site does not contain habitats assessed as suitable for hazel dormouse. The habitats on site do not provide the continuous provisions of food required by hazel dormouse and do not connect well with offsite pockets of woodland. Given the habitats present at the site, it is considered that hazel dormouse are likely absent from the site and are therefore not considered further in this report.

4.4.5 Water Vole

Desktop Study Results

A review of aerial imagery and 1:25,000 OS mapping revealed no suitable habitat for water vole *Arvicola amphibius* within the surrounding area.

Field Survey Results

The site does not contain any habitats suitable for water vole such as rivers, streams or ditches as such it is deemed that the site is unsuitable for water vole. There are no ditches, rivers or streams adjacent to the site. Therefore, water vole are not considered further in this report.

4.4.6 Birds

Field Survey Results

During the field visit the amber listed⁷ species woodpigeon *Columba palumbus* and green listed species blackbird *Turdus merula* were seen flying over the site. The scattered trees and the roofs of the buildings provide suitable breeding habitat for birds.

4.4.7 Reptiles

Field Survey Results

The habitats on the site do not provide any suitable habitats for basking, foraging or commuting reptiles. There is a small area of suitable habitat adjacent to the site, however this is separated from the site by a large fence that touches the ground. As such there is no way for reptiles to enter the site from the adjacent habitat. It is therefore unlikely that reptiles will utilise the site. As such, it is assessed that the site is unsuitable for reptiles and this species group is not considered further in this report.

4.4.8 Great Crested Newt

Desktop Study Results

Consultation with the MAGIC database produced no records of granted European protected species mitigation licences great crested newt *Triturus cristatus* within two kilometres of the site boundary, however, this does not confirm the absence of the species in the local area.

⁷ The UK's birds are split in to three categories of conservation importance - red, amber and green. Red is the highest conservation priority, with species needing urgent action. Amber is the next most critical group, followed by green. Amber list criteria include species which are: in unfavourable conservation status in Europe; subject to historical population decline during 1800–1995, but recovering; subject to moderate (25-49%) decline in UK breeding population or contraction of UK breeding range over last 25 years, or the longer-term period; subject to moderate (25-49%) decline in UK non-breeding population over last 25 years, or the longer-term period; rare breeders (1–300 breeding pairs in UK); rare non-breeders (less than 900 individuals), or; internationally important species with at least 20% of European breeding or non-breeding population in UK.

A review of aerial imagery and 1:25,000 OS mapping revealed no water bodies within 500 metres of the site boundary.

Field Survey Results

The site does not contain any waterbodies and therefore the site is not suitable for supporting breeding great crested newt. The site also does not contain any vegetated habitats suitable for supporting the terrestrial form of great crested newt within the site boundary.

4.4.9 Invertebrates

Field Survey Results

All the habitats within the site are common and widespread And the site is dominated by buildings and hardstanding with very little vegetation present. They are unlikely to support of notable species or assemblages of invertebrates and therefore this species group is not considered further in this report.

4.4.10 Other Relevant Species

Field Survey Results

No other notable or protected species would be present due to a lack of vegetated habitats within the site boundary and therefore these species are not considered further in this report.

4.5 Summary of Key Ecological Features

The following features are those with greatest ecological value that lie within the site's Zone of Influence:

- Two designated sites within one kilometre of the site boundary;
- Suitability to support roosting bats in buildings; and
- Nesting birds.

5.0 POTENTIAL ECOLOGICAL CONSTRAINTS AND RECOMMENDATIONS

5.1 Introduction

This section identifies potential constraints to the proposed development scheme based on the key ecological features as identified in Section 4.0 and summarised in Paragraph 4.5. Recommendations are included for mitigation and compensation based on the identified ecological constraints, and opportunities for enhancement are discussed.

5.2 Further Survey

Further ecological survey work will need to be undertaken prior to the determination of any planning application in order to allow the Local Planning Authority to fully assess the potential effects of the proposals on protected species. At this stage, it is therefore not possible to confirm that the proposals for the site meet the requirements of NPPF and London Borough of Lewisham (refer to Section 2.0). The full detail of mitigation measures cannot be established without the results of more detailed survey work. The more detailed survey work recommended for the site are bat emergence/re-entry surveys (Paragraph 5.5.2)

Details of the survey requirements including survey effort and timings are provided in the relevant sections below.

5.3 Designated Sites

5.3.1 Potential Constraints

The two statutory designated sites within one kilometre of the site boundary are well separated from the site by existing residential development and railway lines. Therefore, no direct effects are anticipated in regard to designated sites. The increase in residential units could cause an increase in indirect effects as a result of recreational pressure. However, Dacre's Wood Nature Reserve (LNR) is locked for health and safety reasons so is permanently inaccessible to members of the public and Sydenham Hill Wood and Cox's Walk (LNR) is open to the public, frequently receives visitors and managed with public accessibility in mind, so this increase in residents to the area is likely to have a negligible effect. As such designated sites are not considered a constraint to the project.

5.3.2 Potential Mitigation and Compensation Measures

No mitigation or compensation measures are recommended at this stage in regard to designated sites.

5.3.3 Enhancement Opportunities

No enhancement measures are recommended at this stage in regard to designated sites.

5.4 Habitats

5.4.1 Potential Constraints

The loss of the hardstanding and buildings are of negligible ecological value and not considered a constraint to the project. Scattered trees are common and widespread within the wider landscape and therefore not considered a constraint to the project.

5.4.2 Potential Mitigation and Compensation Measures

No mitigation or compensation measures are recommended at this stage in regard to habitats.

5.4.3 Enhancement Opportunities

It is recommended that the be enhanced through the provision of introduced shrubs in pot and installation of a green roof.

5.5 Bats

5.5.1 Potential Constraints

B1 and B5 are assessed as having low suitability to support roosting bats and therefore the demolition of these buildings could result in the loss of a roost and/or injury/disturbance to individual bats (if present). Therefore, bats are considered a constraint to the proposals. The proposals at present do not include an increase in lighting levels at the site.

In England, bats and their habitat are fully protected under the Wildlife and Countryside Act 1981 through inclusion in Schedule 5. In addition, all bat species are protected under the Conservation of Habitats and Species Regulations 2017. Refer to **Appendix 5** for details.

5.5.2 Further Survey

As B1 and B5 have low suitability for roosting bats further bat emergence/re-entry surveys are required in order to ascertain the presence/ likely absence of roosting bats within the buildings.

In accordance with the current best practice guidelines (Collins, 2016) for a building assessed as having low suitability a single dusk emergence or dawn re-entry survey is required to establish presence/likely absence. Should the presence of roosting bats be confirmed, the data also allows for an assessment of the status of the roost if present.

The survey must be undertaken within the peak bat survey season (May to August, inclusive).

The dusk emergence survey will commence approximately 15 minutes before sunset until approximately two hours after sunset. The Dawn survey will commence two hours prior to sunrise until approximately 15 minutes after sunrise. Seven surveyors will be required in order to provide sufficient coverage of the two buildings. Surveyors will be suitably experienced and will be equipped with specialised bat detectors. Upon completion of the surveys, identification of the bats present through bat call analysis can be undertaken to reveal the species utilising the site.

5.5.3 *Potential Mitigation and Compensation Measures*

Detailed mitigation and compensation measures for roosting bats will be provided on completion of the further surveys. If bats are confirmed to be roosting within the buildings during the emergence survey, additional roost characterisation surveys may be required and a Natural England Protected Species Licence would be obtained prior to the commencement of works. The bat emergence/re-entry survey data would be incorporated into the bat licence application to inform an appropriate mitigation strategy, which would include sensitive timing of works, sensitive working methods and the provision of compensatory roosting features, if required. This may entail the installation of bat tubes, access to roof void for roosting or creation of crevices for roosting individuals. If no bats are found to be present, no further survey work would be required and no mitigation or compensation measures necessary.

5.5.4 *Enhancement Opportunities*

Opportunities for enhancement should be tailored accordingly with the results of the bat emergence/re-entry survey, in order to provide maximum benefit to the species present on site. Enhancement measures could include the provisioning of integrated bat boxes as part of the new building.

5.6 *Birds*

5.6.1 *Potential Constraints*

The buildings and scattered trees provide suitable habitats to support breeding birds. The demolition of the buildings and removal of scattered trees will result in loss of nesting opportunities and potential disturbance to nesting birds (if present). Therefore, nesting birds are considered a potential constraint to the development

All birds, their nests, eggs and young are legally protected, with certain exceptions, under the Wildlife and Countryside Act 1981. Refer to **Appendix 5** for details.

5.6.2 *Potential Mitigation and Compensation Measures*

The proposed works on the buildings and removal of trees should be undertaken outside of the breeding bird season (March to August, inclusive). If this is not possible a suitably qualified ecologist should inspect the buildings and trees immediately prior to the demolition/vegetation removal. Any active nests encountered should be left undisturbed until the chicks have fledged and/or the nest is no longer in use. This may cause a delay to the demolition works.

To compensate for the loss of suitable nesting habitat, two bird boxes, such as the integrated WoodStone Build-in Open Nest Box or similar, are recommended to be installed within the new buildings. The integrated boxes would ideally be installed as high up as possible and placed on a north or north-east elevation.

5.6.3 *Enhancement Opportunities*

It is recommended that a further three nest boxes are installed within the new building Vivara Pro WoodStone House Sparrow Nest Box or similar. The integrated boxes would ideally be installed as high up as possible and placed on a north or north-east elevation.

6.0 CONCLUSION

6.1 Conclusion

The habitats recorded during the field survey are of negligible ecological value as such the partial loss of these habitats on site is not an ecological constraint. The site has been identified as having potential to support roosting bats in buildings and birds. Further surveys in respect of roosting bats have been recommended.

Potential constraints to the development have been identified and possible mitigation and compensation measures have been recommended. Mitigation measure include sensitive timings of works and replacement opportunities for nesting birds. Enhancement measures include the provision on integrated bat and bird boxes. It is considered that on completion of the further surveys and that all recommended compensation and mitigation measures are followed then the development has the potential to accord with all relevant London Borough of Lewisham, including policy 12 and national planning policy. The recommendations/assessments in this report will need to be reviewed on receipt of the desktop study data.

6.2 Updating Site Survey

If the planning application boundary changes or the proposals for the site alter, a re-assessment of the scheme in relation to ecology may be required. Given the mobility of animals and the potential for colonisation of the site over time, updating survey work may be required, particularly if development does not commence within 18 months of the date of the most recent relevant survey.

7.0 REFERENCES

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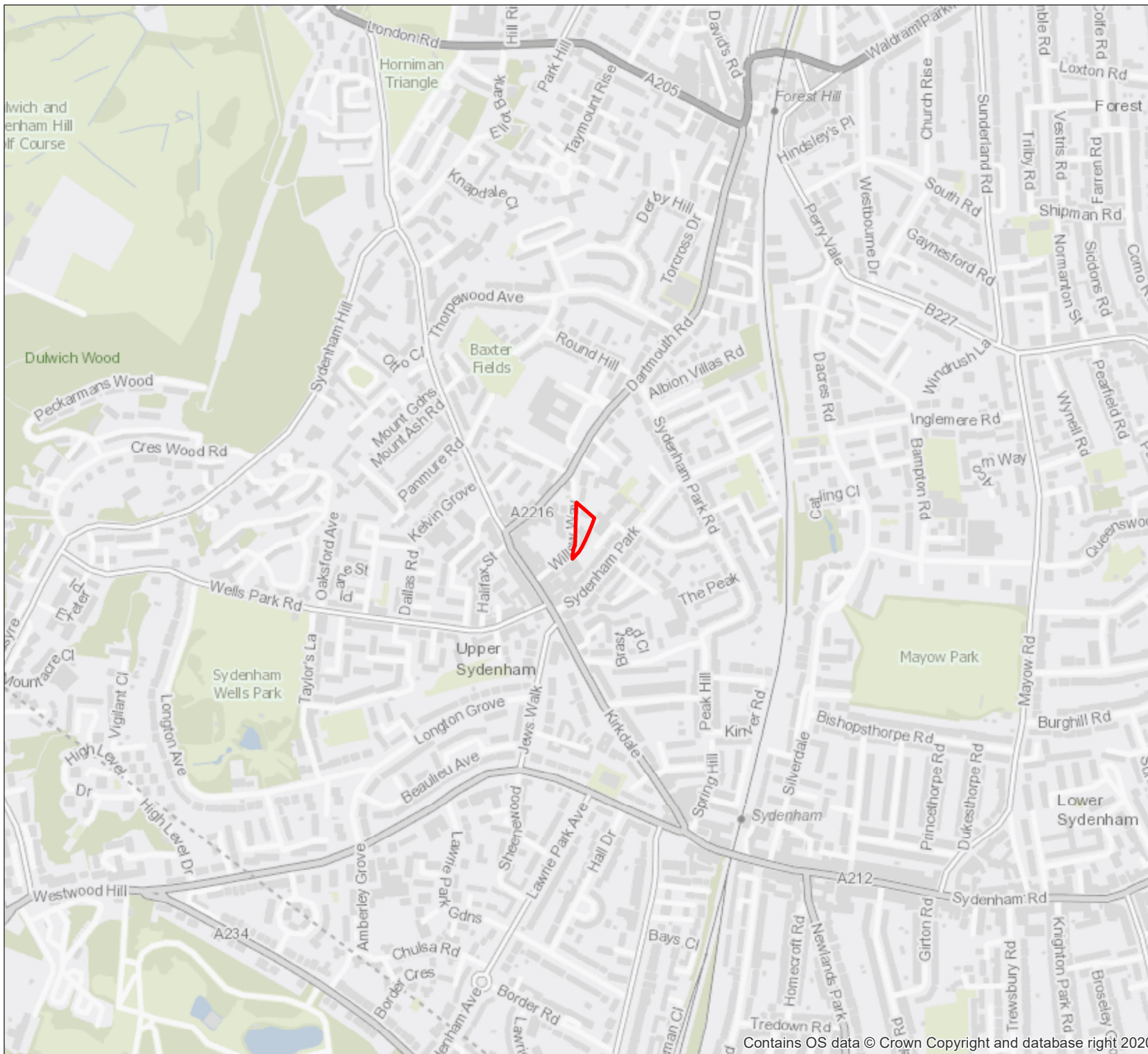
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Map 1 Site Location Plan



WILLOW WAY, SYDENHAM, LONDON

PRELIMINARY ECOLOGICAL APPRAISAL

Map 1 - Site Location Plan

Client:	The Kitewood Group
Date:	December 2022
Status:	Final

KEY



Source: Esri, Maxar, Earthstar
Geographics, and the GIS
User Community

Scale at A4: 1:10,000



Prepared by: EV	Date: 121222
Last amended by: N/A	Date: N/A

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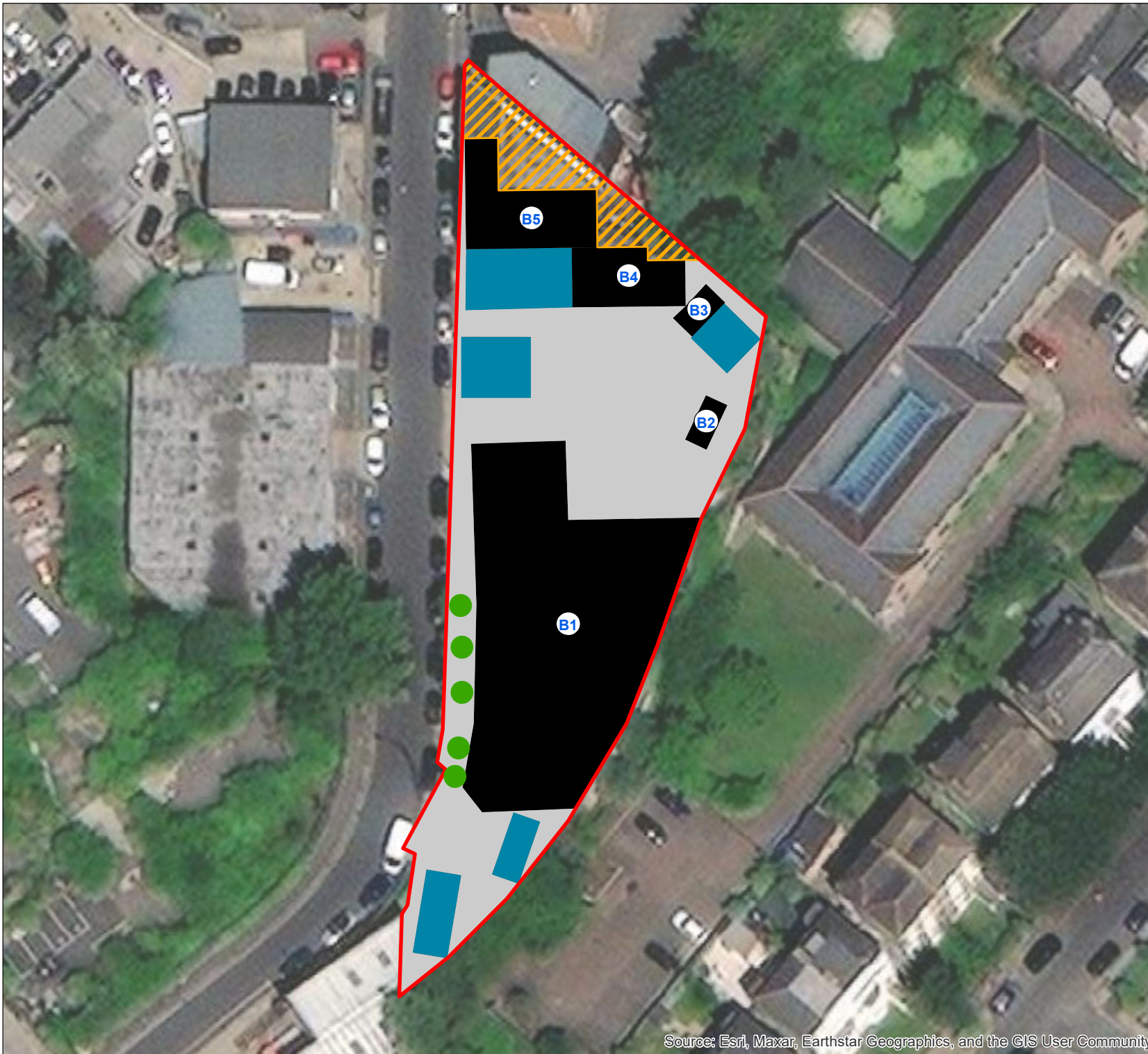
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Map 2 Phase 1 Habitat Map









**WILLOW WAY, SYDENHAM,
LONDON**

PRELIMINARY ECOLOGICAL APPRAISAL

Map 2 - Phase 1 Habitats

Client:	The Kitewood Group
Date:	December 2022
Status:	Draft

KEY

-  Site Boundary
-  No Access
-  Building
-  Hardstanding
-  Shipping Container
-  Scattered Trees
-  Building Number



Prepared by: EV	Date: 121222
Last amended by:	Date:

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Appendix 1 Site Proposals Plan



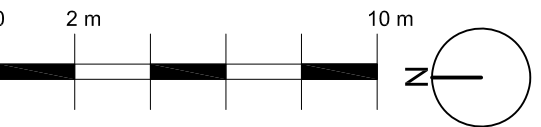
A GROUND FLOOR PLAN
1:200@A1, 1:400@A3

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The contractor is to verify all dimensions and conditions on site.

NOTES:

REVISIONS

DRAFT
14/12/2022



Project :
21 - 57 Willow Way
Sydenham

Client :
Kitewood Estates Ltd

Scale:
1:200 @A1

Title :
GROUND FLOOR PLAN

Drawing Number :
KTW034-DCR-GF-PL-A-0100

Date :
16.11.2022

Drawn by :
CF

Approved by:
--

Appendix 2 Statutory Designated Sites within the Desktop Study Area

Details of statutory designated sites within the desktop study area, as listed in Paragraph 4.2.1, are provided in **Table 2**.

Table 2: Statutory Designated Sites Located Within the Desktop Study Area

Site Name	Dacres Wood
Site Designation	LNR
Approximate Relative Location	Located approximately 390 kilometres east of the site
Reasons for Designation:	
There is a section of looping canal that is part of Dacres Wood, lying to the east of the railway between Forest Hill Station and Sydenham Station. Around this canal is woodland and there are ponds scattered around the woodland.	

Site Name	Sydenham Hill Wood and Fern Bank
Site Designation	LNR
Approximate Relative Location	Located approximately 570 metres west of the site
Reasons for Designation:	
Sydenham Hill Wood forms part of the largest remaining tract of the old Great North Wood, a vast area of worked coppices and wooded commons that once stretched from Deptford to Selhurst. The wood is home to more than 200 species of trees and plants as well as rare fungi, insects, birds and woodland mammals.	

Appendix 3 Sites Designated for Nature Conservation

Statutory Sites

Internationally Designated Sites - Ramsar Sites, Special Areas of Conservation and Special Protection Areas

Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) form a network of protected sites across the European Union and United Kingdom. In the United Kingdom the primary legislative protection is afforded to these sites under the Conservation of Habitats and Species Regulations 2017 (as amended).

Ramsar sites are designated as wetlands of international importance which are afforded similar legislative protection to SPAs and SACs.

SACs are sites which support internationally important habitats or internationally important assemblages or populations of species. SPAs are designated for supporting internationally important populations of birds. SACs, SPAs and Ramsar sites are generally also designated as Sites of Special Scientific Interest.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) there is a legal requirement that competent authorities, such as local planning authorities, need to consider whether plans or projects are likely to have a significant adverse effect on SPAs, SACs or Ramsar sites, either alone, or in combination with other plans or projects. In the event that a likely significant effect cannot be ruled out, on the basis of objective information, then the competent authority must undertake an “Appropriate Assessment” to fully assess the plan or project against the site’s conservation objectives. Unless certain defined derogation tests can be met, the competent authority may not authorise nor undertake any plan or project which adversely affects the integrity of a SPA, SAC or Ramsar site.

Nationally Designated Sites – Sites of Special Scientific Interest and National Nature Reserves

Sites of Special Scientific Interest (SSSIs) receive legal protection under the Wildlife and Countryside Act 1981 (as amended). Such sites are designated to protect specific areas of biological or geological interest of national importance. Such sites also generally receive strict protection through the planning system.

National Nature Reserves (NNRs) are also usually designated as SSSIs and are specifically managed for their wildlife value. They receive legal protection through the National Parks and Access to the Countryside Act 1949 and the Wildlife and Countryside Act 1981 (as amended). As with SSSIs, these sites generally receive strict protection through the planning system.

Locally Designated Sites – Local Nature Reserves

Local Nature Reserves (LNRs) are designated by local authorities under the National Park and Access to the Countryside Act 1949. These are generally designated not only for their local wildlife value but also for education, scientific and recreational purposes. These sites generally receive protection from development through the planning system.

Non-Statutory Sites

Locally Designated Sites

In addition to statutory designations, local authorities often designate sites of nature conservation importance at the local level. Such designations are named differently by each local authority and may be referred to as Local Wildlife Sites (LWSs), Sites of Importance for Nature Conservation (SINCs) or Sites of Nature Conservation Importance (SNCIs), amongst others. The exact level of protection afforded to these sites varies and is normally defined through local planning policy.

Appendix 4 Appraisal Criteria for Bats

The criteria used to assess the suitability of roosting and foraging/commuting habitat for bats is based on industry guidelines and outlined in **Table 3**⁸.

Table 3: Criteria used to Assess Suitability of Roosting and Foraging/Commuting Habitat for Bats

Suitability	Description of roosting habitats	Commuting and foraging habitats
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.	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, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.
Moderate	A structure of 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.	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.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically/structure that does 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 potential roost features but with none seen from the ground or features seen with only very limited roosting potential.	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerows or un-vegetated 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 or a patch of scrub.
Negligible	Negligible habitat features on site likely to be used by roosting bats.	Negligible habitat features on site likely to be used by commuting or foraging bats.

⁸ Table adapted from (Collins, 2016)

Appendix 5 Relevant Legislation

Bats

All UK bat species are listed in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of the Conservation of Habitats and Species Regulations 2017. They are afforded full protection under Section 9(4) of the Act and Regulation 43 of the Regulations. These make it an offence to:

- Deliberately capture, injure or kill any such animal;
- Deliberately disturb any such animal, including in particular any disturbance which is likely:
 - To impair its ability to survive, breed, or rear or nurture their young;
 - To impair its ability to hibernate or migrate;
 - To affect significantly the local distribution or abundance of that species;
- Damage or destroy a breeding site or resting place of any such animal;
- Intentionally or recklessly disturb any of these animals while it is occupying a structure or place that it uses for shelter or protection; or
- Intentionally or recklessly obstruct access to any place that any of these animals uses for shelter or protection.

In addition, five British bat species are listed on Annex II of the Habitats Directive. These are:

- Greater horseshoe bat *Rhinolophus ferrumequinum*;
- Lesser horseshoe bat *Rhinolophus hipposideros*;
- Bechstein's bat *Myotis bechsteinii*;
- Barbastelle *Barbastella barbastellus*; and
- Greater mouse-eared bat *Myotis myotis*.

In certain circumstances where these species are found the Directive requires the designation of Special Areas of Conservation (SACs) by EC member states to ensure that their populations are maintained at a favourable conservation status. Outside SACs, the level of legal protection that these species receive is the same as for other bat species.

Breeding Birds

With certain exceptions, all wild birds, their nests and eggs are protected by Section 1 of the Wildlife and Countryside Act 1981 (as amended). Therefore, it is an offence, to:

- Intentionally kill, injure or take any wild bird;
- Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built; or
- Intentionally take or destroy the egg of any wild bird.

These offences do not apply to hunting of birds listed in Schedule 2 subject to various controls. Bird species listed on Schedule 1 of the Act receive further protection, thus for these species it is also an offence to:

- Intentionally or recklessly disturb any bird while it is nest building, or is at a nest containing eggs or young; or
- Intentionally or recklessly disturb the dependent young of any such bird.