



**Land at 2, 4, 6 and 8 Danson Road**

**Preliminary Ecological Appraisal**

**9<sup>th</sup> September 2019**



<b>Client</b>	Strutt & Parker
<b>Job name</b>	Land at 2, 4, 6 and 8 Danson Road
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# 1 Introduction

## 1.1 Site Description

The site comprises land at 2, 4, 6 and 8 Danson Road, located in the western part of Bexleyheath, to the south-east of London at approximate postcode DA6 8HB. The site, which is estimated to be around 0.3 hectares in size, is centred on Ordnance Survey grid reference TQ 475 754 and contains four residential properties, with dwellings and associated garden areas.

The land immediately surrounding the site is suburban in character, containing residential and commercial properties, along with roads, amenity grassland, scattered trees, sport's pitches and parkland. The site is directly adjacent to Danson Park, a Borough Grade 1 Site of Importance for Nature Conservation (SINC). The site and surrounding area are illustrated in aerial images provided in Appendix 1 and photographs of the site are provided in Appendix 2.

## 1.2 Proposed Works

It is understood that the proposed works are the subject of a planning application to the London Borough of Bexley, the Local Planning Authority (LPA) for the demolition of the existing dwellings and construction of a 70-bedroom care home.

Consultation feedback from the LPA has specified that the proposed development needs to avoid the risk of adversely impacting on the SINC and provide a net gain for biodiversity.

## 1.3 Aims of Study

To inform the planning application, GreenLink Ecology Ltd. has been commissioned to undertake a preliminary ecological appraisal (PEA), to identify what habitats are present and look for any evidence of, or potential for, protected/notable species.

The aim of this report is to present the results of the survey, highlight any areas of conservation concern and make recommendations for appropriate mitigation/enhancement measures to comply with legislation/planning policy.

## 2 Methodology

A survey was undertaken by experienced consultant ecologist Marcus Fry MCIEEM<sup>1</sup> on 17<sup>th</sup> April 2019 following published guidelines<sup>2/3</sup>. The native plant species and habitat types present were identified and any evidence of, or potential for, protected/notable species was recorded. On the day of the survey the weather conditions were sunshine with scattered cloud and the temperature at midday was around 14°C.

In addition, the Multi Agency Geographic Information for the Countryside (<http://magic.defra.gov.uk>) database was accessed for information relating to statutory designated sites from within the surrounding area.

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<sup>1</sup> Member of the Chartered Institute of Ecology and Environmental Management (Full)

<sup>2</sup> JNCC, (1990), *Handbook for Phase 1 Habitat Survey - A Technique for Environmental Audit, Revised Reprint 2007*

<sup>3</sup> CIEEM (2012) *Technical Guidance Series – Guidelines for Preliminary Ecological Appraisal*. Institute of Ecology and Environmental Management, May 2012.

## 3 Results

### 3.1 Habitat Description

In addition to the dwellings, which are considered in a subsequent section, the site contains hard standing, amenity grassland, miscellaneous planting, sections of hedgerow and scattered trees.

Hard standing is present throughout the site where there are driveways, footpaths and paved areas. This represents an artificial habitat type that is of inherently low ecological value, with no potential for protected/notable species.

The amenity grassland is predominantly located to the rear of the properties and is species-poor in composition, being dominated by perennial rye-grass (*Lolium perenne*), along with yarrow (*Achillea millefolium*), daisy (*Bellis perennis*), ribwort plantain (*Plantago lanceolata*), moss (*Brachythecium rutabulum*) and dandelion (*Taraxacum officinale*). This represents a habitat type that is of low ecological value, with no potential for protected/notable species.

The miscellaneous planting is also predominantly located to the rear of the properties and comprised of non-native ornamental species, along with ruderal species (weeds). This represents a habitat type of low ecological value, although some of the larger shrubs have the potential for seasonal use by breeding birds, as described in a subsequent section.

There are short sections of hedgerow present in the northern and western parts of the site, which are species-poor in composition, comprised of privet (*Ligustrum* sp.), common ivy (*Hedera helix*) and non-native evergreens. This represents a habitat type of relatively low ecological value, although it has the potential for seasonal use by breeding birds, as described in a subsequent section.

There are low numbers of scattered trees within/close to the site boundaries, with species present including oak (*Quercus robur*), London plane (*Platanus × hispanica*), ash (*Fraxinus excelsior*), apple (*Malus domestica*), blackthorn (*Sambucus nigra*), beech (*Fagus sylvatica*) and non-native ornamental species. The small number of trees represent a habitat type of relatively low ecological value, although they have the potential for seasonal use by breeding birds, as described in a subsequent section.

None of the plants recorded within the site are protected or notable species and there are no habitats present that are themselves of conservation concern.

### 3.2 Protected/Notable Species

#### 3.2.1 Bats

Since the proposed works include the demolition of the existing buildings, which could directly impact upon bats, if present, these were assessed internally and externally by Natural England licence holder Marcus Fry MCIEEM (no. 2015-10955-CLS), for any evidence of, or potential for bats, in accordance with the 2016 Bat Conservation Trust's (BCT) published guidance<sup>4</sup>. Features and evidence considered during the survey included:

- Roof and wall construction;
- Features that have the potential to be actual bat roosts or provide access to roosting opportunities within the buildings;
- Any droppings and/or staining on external walls;

<sup>4</sup> Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines*, Bat Conservation Trust (3<sup>rd</sup> Edition)

- Scattered or accumulated bat droppings (identified by their dry, powdery texture when compressed) within the dwelling's roof voids or around entrances to potential roosts;
- Oily staining, scratch marks and/or urine staining around access points to potential roosting locations;
- Places where cobwebs have been swept away; and
- The actual presence of live or dead bats.

The dwellings are all two-storey, with brick walls and pitched roofs clad in machine-made concrete tiles. Internally, there are insulated roof voids used for storage. In summary, there was no evidence of bats recorded in association with any of the buildings and there was no significant potential identified for roosting bats.

Since the proposed works may affect the trees within/close to the site, these were also assessed by experienced Natural England licence holder Marcus Fry MCIEEM (no. 2015-10955-CLS), and categorised (to align with BS 8596:2015 "Surveying for Bats in Trees and Woodland") in accordance with the 2016 BCT published guidance:

- Negligible potential – Unlikely to be used by roosting bats.
- Low potential – A tree of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with only limited roosting potential
- Moderate potential – A 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 significance.
- High potential – A 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, protection, conditions and surrounding habitat.

In summary, there was no evidence of bats recorded in association with these trees and they are all considered to have negligible/low potential for use by roosting bats.

### 3.2.2 Breeding Birds

No evidence for breeding birds was recorded during the survey, which was undertaken relatively early in the breeding season (March-July/August), although potentially suitable habitat was identified throughout the site where there are large shrubs within the miscellaneous planting, sections of hedgerow and trees, along with bird boxes in some of the rear gardens.

### 3.3 Designated Sites

According to the Multi Agency Geographic Information for the Countryside database, the closest statutory designated site for nature conservation is Danson Park Bog Garden Local Nature Reserve (LNR), located circa 700 metres to the south-west of the site.

As described in Section 1.1, the site is directly adjacent to Danson Park, a non-statutory designated Borough Grade 1 SINC (ref: BxBI07), containing marsh/swamp, pond/lake, veteran trees, wet woodland/carr and woodland habitats. It should be noted however, that these notable habitats are not located close to the development site and the habitats types within the SINC that are in close proximity to the site include amenity grassland and scattered trees, which are of limited ecological value.

## 4 Assessment

### 4.1 Constraints

It was possible to directly access the entire site and the survey was undertaken by an experienced consultant ecologist, during an appropriate time of the year and using standard survey techniques. It is therefore considered that there were no significant constraints to the PEA.

### 4.2 Potential Impacts

#### 4.2.1 Habitats

The site is dominated by common/widespread habitats types that are not of conservation concern and impacts to these habitats are therefore considered to be insignificant.

However, there are trees within the site that may be retained and others that are off-site but close to the boundaries, which could be potentially impacted on by the ground works associated with the proposals and therefore, precautionary mitigation measures are recommended in a subsequent section.

#### 4.2.1 Protected/Notable Species

##### 4.2.1.1 Bats

During the survey, there was no evidence of bats recorded and no significant potential for roosting bats was identified. It is therefore considered that there is no perceived risk of impacts to bats as a result of the proposed works.

The proposed works could actually have a positive impact for bats through the provision of 'built-in' roost features within the new building.

##### 4.2.1.2 Breeding Birds

Although no evidence for actively breeding birds was recorded during the survey, potentially suitable habitat (i.e. large shrubs within the miscellaneous planting, sections of hedgerow and trees), along with bird boxes were identified throughout the site, many of which will be removed/disturbed to facilitate the proposed works.

Therefore, breeding birds could be impacted on by the proposed works, if undertaken during the breeding season (March-July/August, as a guide). To avoid the seasonal risk of impacts to breeding birds, precautionary mitigation measures are recommended in a subsequent section.

The proposed works could actually have a positive impact for birds through the provision of 'built-in' nesting features within the new building.

#### 4.2.2 Designated Sites

The proposed development site is located circa 700 metres from the closest statutory designated site and buffered from it by a substantial area of land. Whilst the non-statutory designated Borough Grade 1 SINC Danson Park is located immediately adjacent to the proposed development site, there are no notable habitat types for which the SINC is designated within close proximity.

Since the proposals are restricted to the existing residential boundaries, it is considered that there is no perceived risk of potential impacts to statutory designated sites or to the SINC.



## 4.3 Legislation and Policy

### 4.3.1 Bats

All species of bat and their habitats are fully protected under the Wildlife and Countryside Act 1981 (as amended by the CRoW Act 2000), and by the Conservation of Habitats and Species Regulations 2010, which consolidates all the various amendments made to the Conservation (Natural Habitats, &c.) (Amendments) Regulations 1994 in respect of England and Wales.

The 1994 Regulations transposed Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive) into national law. The legislation makes it illegal under the Wildlife and Countryside Act 1981 (as amended) to:

- Intentionally or recklessly kill, injure or take a wild bat;
- Be in possession or control of any live or dead wild bat, or any part of, or anything derived from a wild bat;
- Intentionally or recklessly damage, destroy or obstruct access to any place that a wild bat uses for shelter or protection; and
- Intentionally or recklessly disturb any wild bat while it is occupying a structure or place that it uses for shelter or protection.

All species of bat are also European Protected Species (EPS). As such under the Conservation of Habitats and Species Regulations 2010 it is an offence to:

- Deliberately capture, injure or kill any wild animal of a European Protected Species;
- Deliberately disturb wild animals of any such species. Disturbance of animals includes in particular any disturbance which is likely to:
  - impair their ability -
    - to survive, to breed or reproduce, or to rear or nurture their young; or
    - in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
  - to affect significantly the local distribution or abundance of the species to which they belong;
- Deliberately take or destroy the eggs of such an animal; or
- Deliberately damage or destroy a breeding site or resting place of such an animal.

### 4.3.2 Breeding Birds

Breeding birds are protected under the Wildlife and Countryside Act 1981 (as amended) which makes it an offence to intentionally or recklessly kill, injure or take any wild bird or take, damage or destroy its nest whilst it is in use or being built, or to take or destroy its eggs.

### 4.3.3 National Planning Policy Framework

The Government published the National Planning Policy Framework (NPPF) in 2012, which replaced previous policy documents, including Planning Policy Statement 9 (PPS9): Biodiversity and Geological Conservation.

The NPPF states that when determining planning applications, LPAs should aim to conserve and enhance biodiversity by encouraging opportunities to be taken for the incorporation of biodiversity in and around developments.

## 5 Recommendations

### 5.1 Mitigation Measures

#### 5.1.1 Habitats

To avoid the risk of impacts to the trees on/close to the boundaries, these should be protected in accordance with BS 5837:2012 "*Trees in Relation to Design, Demolition and Construction - Recommendations*".

This should include a protection fence comprised of 'heras' panels that are securely braced at regular intervals, to be positioned along the edge of the Root Protection Areas (RPA) i.e. beyond one metre from the extent of tree canopies.

This fence will need to be maintained in place until the construction work has been completed, to ensure that no damage to stems or roots, no soil compaction by vehicles, no contamination of soil from spillages, no scorching from fires, or instability/stress from changes in soil levels shall take place.

#### 5.1.2 Protected/Notable Species

##### 5.1.2.1 Bats

Since it is considered that there is no significant risk of bats being directly impacted on by the proposed works, mitigation measures should not be required for bats. However, if at any time during the proposed works, it becomes apparent that bats are present and at risk of direct impacts, works will need to cease whilst an experienced ecologist is contacted and consulted about how to proceed without the risk of an offence being committed.

##### 5.1.2.2 Breeding Birds

The disturbance or removal of potentially suitable habitat and bird boxes should ideally be undertaken outside of the breeding bird season (avoiding March-July/August as a guide).

If it is necessary to conduct such work during the breeding season, this should be carried out under the supervision of an experienced ecologist, who will check for the presence/absence of any birds' nests.

If any active nests are found then works with the potential to impact on the nest must temporarily cease and an appropriate buffer zone should be established until the young have fledged and the nest is no longer in use.

#### 5.1.3 Designated Sites

Since there is no perceived risk of potential impacts to designated sites as a result of the proposed works, mitigation measures are not considered necessary.

However, on a precautionary basis, the Tyler Grange Landscape General Arrangement Plan includes new hedging and shrub planting on the site's northern and western boundaries with the SINC, to buffer this non-statutory designated site from the proposed development.

## 5.2 Enhancement Measures

The NPPF (Section 4.3.3) states that *"the planning system should contribute to and enhance the natural and local environment by... minimising impacts on biodiversity and providing net gains in biodiversity where possible"*. This requirement has been reinforced by consultation feedback from the LPA. Therefore, the following measures are recommended to ensure that the proposed works have a positive impact for biodiversity:

- The soft landscaping scheme should specify at least 70% native species of plant, or non-native species with a known benefit to wildlife. This should include a variety of herbaceous plants, shrubs, climbers, hedgerows, small trees and water features, to create a diversity of habitat type/structure and a net gain for local biodiversity. This is detailed in the Tyler Grange Landscape General Arrangement Plan, as follows:
  - Only native trees are proposed;
  - Each planting typology/mix has a selection of native and exotic shrub species, with a particular emphasis on plants that are good for invertebrates;
  - Selected species include evergreens for year round interest and species that retain seed heads in winter to benefit birds;
  - There are 20+ species in the planting proposal that are identified by the Royal Horticultural Society (RHS) as 'Plants for Pollinators';
  - Native climbers have been selected to create green walls within the sunken gardens and to climb up the pergola; and
  - Species that can tolerate shade have been selected for the northern façade.
- The new building should incorporate 2 no. 'built-in' bat boxes and 8 no. 'built-in' bird boxes (general purpose, house sparrow and swift) within the fabric of the walls (e.g. <http://www.birdbrickhouses.co.uk/shop/>), to ensure long-term roosting/nesting opportunities are available for the lifetime of the buildings. These should be installed on a different orientations, although avoiding the southern aspect for birds and ensuring that the bat boxes are not illuminated by artificial lighting. The exact make/model and location can be determined upon advice from an experienced ecologist, further to planning permission being granted.

## 6 Conclusions

To inform a planning application, GreenLink Ecology Ltd. was commissioned to undertake a PEA for the site, which has been conducted without significant constraint.

The survey that was undertaken on 17<sup>th</sup> April 2019 by an experienced consultant ecologist, determined that the site contains common/widespread habitat types that are not of conservation concern. Mitigation measures for habitats are only recommended for retained/off-site trees.

During the survey, an assessment of the site's potential to support legally protected species was made, with bats and breeding birds being considered.

Since it has been assessed that there is no significant risk of bats being directly impacted on by the proposals, mitigation measures have not been recommended for bats.

To avoid the seasonal risk of impacts in relation to potentially suitable habitats and bird boxes, mitigation measures have been recommended for breeding birds.

Although there is a statutory designated site for nature conservation and non-statutory SINC in the local area, there is no perceived risk of impacts as a result of the proposed works and therefore, mitigation measures are recommended on a precautionary basis only.

In accordance with the NPPF, recommendations have also been made for ecological enhancement measures to benefit habitats, bats and breeding birds, to provide a net gain for local biodiversity.

Overall, there are no known overriding ecological constraints that would prevent the proposed works going ahead, subject to the recommendations made in this report being correctly implemented.

## 7 Disclaimer

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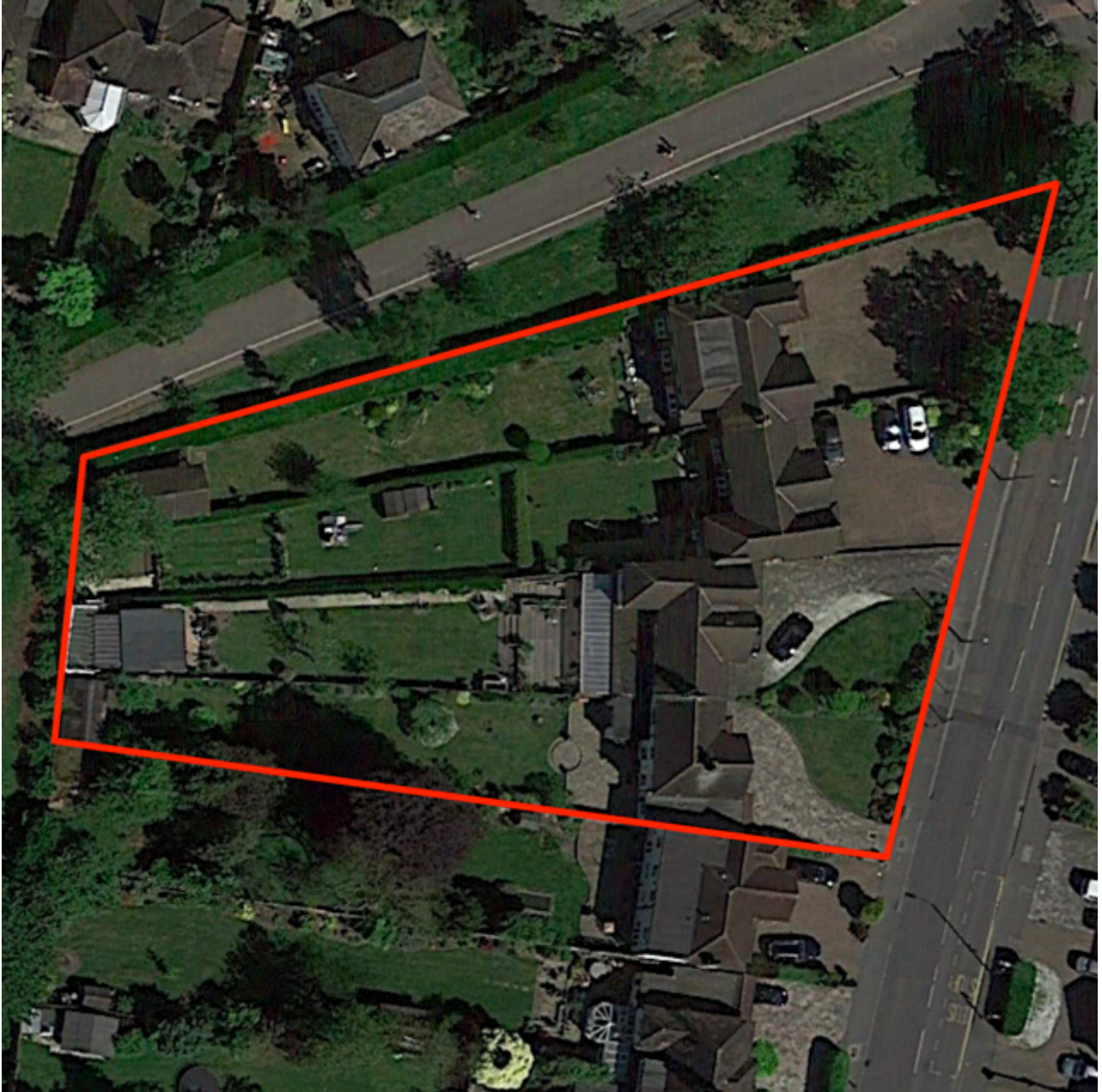
Any recommendation, opinion or finding stated in this report is based on circumstances and facts as they existed at the time that GreenLink Ecology Ltd. performed the work.

Nothing in this report constitutes legal opinion. If legal opinion is required the advice of a qualified legal professional should be secured.

## 8 Appendices

Appendix 1: Aerial images illustrating the approximate boundaries and surrounding area

Photograph 1: The site and immediate surrounding area



Photograph 2: The site and wider surrounding area



Appendix 2: Photographs of the site

Photograph 1: Front of 2 and 4 Danson Road, looking south-west



Photograph 2: Front of 6 and 8 Danson Road, looking south-west





Photograph 3: Rear of the site, looking east



Photograph 4: Rear garden of 2 Danson Road, looking west



Photograph 5: Rear garden of 4 Danson Road (upper part), looking west



Photograph 6: Rear garden of 4 Danson Road (lower part), looking west



Photograph 7: Rear garden of 6 Danson Road, looking west



Photograph 8: Rear garden of 8 Danson Road, looking east



Photograph 9: Internal roof void of 2 Danson Road (no evidence of bats)



Photograph 10: Internal roof void of 4 Danson Road (no evidence of bats)



Photograph 11: Internal roof void of 6 Danson Road (no evidence of bats)



Photograph 12: Internal roof void of 8 Danson Road (no evidence of bats)

