

Appendix F

Ecology

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F1 Natural England Consultation

[REDACTED]

From: [REDACTED]
Sent: 08 April 2020 10:37
To: [REDACTED]
Subject: [External] Telephone call follow up - covid-19 restrictions

Hi [REDACTED]

Further to our telephone conversation this morning. Some notes below on surveys and covid-19 restrictions. The first two points are quite generic and the last two are confirmations of what was discussed earlier today.

1. Lower survey effort

Natural England still requires sufficient information in order to assess the potential impacts on a species and its conservation status from the proposed work. This information is required for Natural England to discharge its legal duties. There may be occasions where we will accept lower levels of survey effort than typical, however we would still need to have sufficient confidence in the likely impacts from the proposal, and confidence that the three licensing tests are met. Consultants may wish to consider whether Licensing Policy 4 (LP4) is applicable in their situation. (I have previously sent you some outline information on LP4, in November 2019.)

2. Non-standard survey methods

In certain situations, non-standard survey techniques may be accepted by Natural England in support of licence applications. We still however need to have confidence that the species and impacts have been appropriately surveyed and assessed. Applicants need to ensure they include full justification and ecological reasoning for any deviation to standard survey practices.

3. 3 month walkover survey

As discussed, my view is that in most cases, it will be acceptable to use other available information (such as that provided by the licensee including photographs if these are available), to update on the site condition/situation, as an alternative to travelling specifically to undertake this single task. We would however expect the named ecologist/accredited agent to undertake this task as soon as practicable when attending site (e.g. to commence licensable works) and act appropriately on any unexpected changes or new information encountered.

4. Pre demolition emergence/re-entry survey

As discussed, a post-licensing, pre-demolition emergence/re-entry survey may be an appropriate measure as part of exclusion/soft demolition protocol. Such a survey can be included in licence conditions if suitable/necessary. However, it cannot replace survey required pre-licensing to inform impact assessment and mitigation and compensation (and for Natural England, to assess the Favourable Conservation Status test). You will need to determine whether you have sufficient survey information to achieve this. As discussed previously, you may also wish to consider whether Licensing Policy 4 is applicable.

[REDACTED]
[REDACTED]
Natural England Wildlife Licensing Service, Species Team
Tel: 02082 257629

I am currently working reduced hours 08:00-12:00 Monday-Friday.

My associated office is Bristol, but I am working at home. **Please send documents to me by email, not post, while our Mail Hub office is closed.**

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To help people consider the environment Natural England offers two chargeable services

- the [Discretionary Advice Service](#) (DAS), which can provide advice on planning/licensing proposals
- the [Pre-submission Screening Service](#) (PSS) for European Protected Species mitigation licence applications.

In an effort to reduce Natural England's carbon footprint I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

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[REDACTED]

From: [REDACTED]
Sent: 27 November 2019 11:22
To: [REDACTED]
Subject: [External] Further information on licensing policy 4 (re: bat licensing query received 21 November 2019)

Dear [REDACTED]

Further to our telephone conversation today, please see some information on Natural England's licensing policies, particularly licensing policy (LP) 4.

Summaries of the LPs are available at: <https://www.gov.uk/government/consultations/wildlife-licensing-comment-on-new-policies-for-european-protected-species-licences>

Further information on using the LPs is available through a CIEEM webinar presented by Natural England, held 3 March 2017 and available at: https://www.youtube.com/watch?v=26e90S0_foE

Where LP4 is to be used, Natural England would expect that as much appropriate survey work is undertaken as possible, including desk study.

At the end of this email, I have included some detailed (but generic) information on the use of LP4. Please examine this guidance and assess whether your case fits in with LP4.

If you would like to make use of either DAS or PSS, further information including request forms can be found at the links in my email signature at the very end of this email.

I hope this is useful.

Kind regards

Madeleine

Policy 4: Appropriate and relevant surveys where the impacts of development can be confidently predicted

The policy wording is as follows:

'Natural England will be expected to ensure that licensing decisions are properly supported by survey information, taking into account industry standards and guidelines. It may however accept a lower than standard survey effort where: the costs or delays associated with carrying out standard survey requirements would be disproportionate to the additional certainty that it would bring; the ecological impacts of development can be predicted with sufficient certainty; and mitigation or compensation will ensure that the licensed activity does not detrimentally affect the conservation status of the local population of any EPS.'

General principles on how this policy should be used

Good survey information must remain the cornerstone of our decision making. We do not wish to see survey standards diluted, and we must not accept poor quality surveys that pose unacceptable risks to EPS.

As such this policy must only be used if the following circumstances apply:

- ✍ The costs or delays associated with carrying out standard survey requirements would be disproportionate to the additional certainty that it would bring
- ✍ The ecological impacts of development can be predicted with sufficient certainty
- ✍ Mitigation or compensation will ensure that the licensed activity does not detrimentally affect the conservation status of the local population of any EPS

We feel that this proposed policy offers further scope to increase flexibility and pragmatism to survey standards, in circumstances where a reduced surveying effort can be clearly justified, and where safeguards can be provided in the form of mitigation or compensation measures.

Assessing whether the costs of delays associated with carrying out standard survey requirements would be disproportionate to the additional certainty that it would bring

This assessment requires us to find the right balance between obtaining information through surveying, and relying on expert judgement. A number of factors will be relevant including:

- ✍ The amount of money a full survey programme would cost, relative to the scale of the project and the scale of potential impact
- ✍ The delays that would be incurred if it was necessary to stop work and wait for a full survey programme to be undertaken
- ✍ The level of surveying that it is possible to undertake. For example:

- If bats are discovered towards the end of the survey season there may still be time to undertake a proportion of the standard survey requirements.
- Health and safety constraints.

Assessing whether the ecological impacts of development can be predicted with sufficient certainty

This will often depend on what alternative information is available. For bats this could be information held by local bat groups and local records centres on the species that are known to use the area, DNA analysis of droppings found in the building, and a thorough inspection of the building to allow an expert judgement on the type of roost, what species are likely to use it and maximum occupancy. For GCN an alternative approach could involve eDNA tests plus a habitat survey to enable a judgement about the extent of occupied habitat and its likely importance.

It will also depend on whether the situation is routine or whether it is novel or complex. For example, if common pipistrelle bats are discovered whilst reroofing a terraced property, an ecologist may be able to predict how they are using the roost and the maximum number that are likely to be present. However, if a number of bat species are using a historic building predicting how they use it and maximum population sizes is likely to be much more difficult.

Assessing whether the mitigation or compensation will ensure that the licensed activity does not detrimentally affect the conservation status of any local EPS population

There needs to be the same level of confidence that the 3 licensing tests are met as there would be if standard surveys were carried out. This policy is about using alternative information to survey data, not about lowering the level of confidence required to make decisions.

The agreed level of mitigation/compensation will need to be enough to mitigate and compensate for the maximum impact of the licensed activity. For example, if an eDNA test plus HSI leaves open a reasonable possibility that a high GCN population could be lost, habitat compensation would need to be on a scale sufficient to accommodate a high population. If an ecologist judges that it is possible that a maternity roost is potentially used by 3 species of bat, compensation would need to deliver the needs of all 3 species.

The above approach has sometimes been referred to as 'precautionary mitigation' or 'worst case scenario licensing'. However, it is important to recognise that this approach may simply be requiring the necessary measures to be put in place.

Assessing applications that use this policy against the avoid-mitigate-compensate hierarchy and the 3 licensing tests

Avoid-mitigate-compensate hierarchy

This policy does not alter the way in which this hierarchy is considered. Alternative survey information should inform consideration of this hierarchy in the same way as actual survey information.

FCS test

In order to meet the FCS test the mitigation/compensation will need to compensate for the 'worst case scenario' i.e. the maximum potential usage of the development by the EPS concerned.

Natural England Wildlife Licensing Service (DT3)

Tel: 02082 257629

My associated office is Bristol but please send post to **Mail Hub, Natural England, County Hall, Spetchley Road, Worcester WR5 2NP** marked for my attention.

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- the [Pre-submission Screening Service \(PSS\)](#) for European Protected Species mitigation licence applications.

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F2 Ecology and biodiversity methodology

F2.1 Assessment methodology

Scope

- F2.1.1** The zone of influence for a project is the area over which ecological features may be subject to significant effects from impacts as a result of the Proposed Development. For the purposes of this assessment, the features considered and their zone of influence are:
- Designated sites – on a precautionary basis, those up to 1km of the site were considered in the assessment;
 - Habitats – within the site, such as amenity grassland and scattered trees, due to vegetation clearance and earthwork, as well as effects from the operation of the site such as lighting. This also takes into account the potential for improvements to habitat condition and distinctiveness, as well as habitat connectivity; and
 - Legally protected and notable species – this varies significantly depending on the species but is considered, given the bat species present, to extend up to approximately 100m from the site. This also takes into account the potential for improvements for species such as bats.

Identifying ecological features

- F2.1.2** Ecological features are identified and valued within a defined geographical context in line with the criteria in Table G3.1. This valuation takes into account a range of factors, including population trends and habitat condition.

Table G3.1: Criteria for the Valuation of Ecological Features adapted from CIEEM ‘Guidelines for Ecological Impact Assessment’

Geographical Context	Criteria
International	Statutory sites designated or classified under international conventions or European legislation. Sites supporting habitats or species populations that are important in an international context. This includes those listed on Annexes I II, IV and V of the Habitats Directive and Annex I of the Birds Directive.
National	Statutory sites designated under national legislation, for example Sites of Special Scientific Interest (SSSIs). Sites supporting habitats or species populations that are important in a national context, including those of principal importance under Section 41 of the NERC Act 2006.
Regional	Sites supporting habitats or species populations that are important in a regional context.
County or metropolitan	Non-statutory Sites of Metropolitan Importance for Nature Conservation (SMINCs). Sites supporting habitats or species populations that are important in a metropolitan, county or vice-county context, including those listed on the London Biodiversity Action Plan (LBAP).

Geographical Context	Criteria
Borough or district	Statutory designated Local Nature Reserves (LNRs) and sites supporting habitats or species populations that are important in a borough or district context.
Local	Sites of Local Importance for Nature Conservation (SLINCs) and sites that have no formal designation but contain species or habitats that are important to the ecological integrity of the local area.
Site	A regularly occurring native species or habitat that is widespread and common throughout the UK.

Impact assessment

F2.1.3 This Ecological Impact Assessment (EcIA) has been undertaken in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) good practice guidance¹ and principles for biodiversity net-gain².

Characterising impacts

F2.1.4 Impacts are actions resulting in changes to an ecological feature. Both positive and negative impacts of the Proposed Development are identified within this assessment, and described with reference to their extent, magnitude, duration, timing, frequency and reversibility.

F2.2 Assessment criteria

F2.2.1 Effects are the outcomes to an ecological feature, resulting from an impact. The assessment determines the significance of potential effects on ecological features identified within their respective zones of influence. For the purpose of this EcIA, a significant effect is defined as an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general. Conservation objectives may be specific (e.g. for a designated site) or broad (e.g. national/local nature conservation policy) or more wide-ranging (enhancement of biodiversity).

F2.2.2 Significant effects encompass impacts on the structure and function of defined sites, habitats or ecosystems and the conservation status of habitats and species (including extent, abundance and distribution). For habitats, conservation status is determined by the sum of the influences acting on the habitat that may affect its extent, structure and functions as well as its distribution and its typical species within a given geographical area. For species, conservation status is determined by the sum of influences acting on the species concerned that may affect its abundance and distribution within a given geographical area.

F2.2.3 Effects can be considered significant at a wide range of scales from international to local. As features of less than local importance would not be a material

¹ CIEEM (2018) Guidelines for Ecological Impact Assessment (EcIA). Available from: <https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/>

² CIEEM (2019) Biodiversity Net Gain – A Practical Guide. Available from: <https://cieem.net/i-am/current-projects/biodiversity-net-gain/>

consideration for the Proposed Development, only features of local or higher importance have been considered.

Cumulative effects

F2.2.4 Cumulative effects can result from individually insignificant but collectively significant actions taking place over a period of time or concentrated in a location. Therefore, multiple activities may give rise to significant effects on ecological receptors to the Proposed Development due to their proximity in time and space. A cumulative impact assessment has been undertaken which considers whether impacts identified in Appendix A3 may elevate any effects associated with the Proposed Development.

F3 Preliminary Ecological Appraisal and Bat Report

Extended Phase 1 Habitat Survey

Ebury Bridge Estate, Westminster, London



Completed by:

Marishal Thompson Group
Arboricultural & Ecological Consultants

Address	Ebury Bridge Estate, Westminster, London, SW1W 8SU		
Client	HTA Design LLP	Ecologist	Phill May/ Jenny Singh
MT Ref	E0409131407	Director	Paul Thompson
Report Date	16 September 2013	Quality Checked	Paul Hiscocks
Scope of Report	Extended Phase 1 Habitat Survey		

Leamington Spa • Borehamwood • Epsom • Thirsk • Newcastle • Bangor • Bristol

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Executive Summary

The Phase One Habitat Survey was undertaken by two experienced ecologists at Ebury Bridge Estate, Westminster, London, SW1 8SU on 9th September 2013.

The site currently comprises a number of large residential accommodation flats set in landscaped grounds, with trees shrub beds and lawns around its boundary. The site is located within a predominantly residential area surrounded by properties of similar construction within the central part of London, with the Victoria railway station complex to the north and marshalling yard along the eastern boundary and the grounds of the Chelsea Hospital and the Chelsea embankment along the river Thames to the south of the site.

The site has a series of service roads with small raised paved beds, areas of hard standing and small lawns. Parts of the site have been fenced off to form new amenity areas along with raised beds to grow vegetables and seasonal displays. The site has single specimen trees and shrubs along with larger beds around a central playground area.

Although full details of the proposals for the site are currently unknown, it is thought that proposals will include some demolition, new construction and refurbishment of older properties where necessary. As the proposals for the site are not currently finalised, the following recommendations are made:-

1. A dedicated bat survey will be required to evaluate the activity and presence of bats within the site and the boundary. The buildings on the site have a number of features suitable to support roosting bats and the landscaped areas are of a value for foraging bats.
2. Wherever possible wild flower seed mix (suitably sourced for the area) and native trees and shrubs used to landscape areas. Sparrow, Starling and Swift nest boxes should be included within the development design along with bat boxes. Assistance should be engaged from an ecologist in the design and location of bird/bat boxes.



1.0 Introduction

Marishal Thompson Group was commissioned by HTA Design LLP, to undertake an Extended Phase One Habitat Survey.

The survey is required in relation to a planning application at Ebury Bridge Estate, London.

The site is centred at Ordnance Survey Grid Reference TQ 285 783.



OS. Licence No.100043218

1.1 Site Description

A drawing of the development area is included within Appendix I and comprises of a series of multi storey flats forming a residential estate with associated amenity areas. The majority of the flats are 5 storeys high with tiled roofs, with various extensions over time to add features such as Lifts and new entrances. There is a new building in the western section of the site, Edgson House, which appears as precast concrete panels with a flat membrane roof. Within the site is an all-weather multi sports pitch as well as a play area within ornamental trees and shrubs. Around the bases of the flats are individual amenity areas, which are separated from the main area by steel fences. These areas have small areas of lawn with raised beds along with small storage sheds.



1.2 Scope of Survey

We have been instructed to undertake a Phase 1 Habitat Survey; this is not a survey for the purposes of The Wildlife and Countryside Act 1981 (Variation of Schedule 9 or Schedule 9) (England and Wales) Order which came into force on 6 April 2010 or National Vegetation Classification.

The scope of the report is to assess the site and map all habitats present. In addition to this make recommendations based upon the findings of the survey in relation to European Protected or Notable Species and any phase 2 survey work required to satisfy planning requirements.

1.3 Limitations

Parts of the site were not accessible during the site, in particular the eastern (rear) boundary and the internal courtyards. This reduces the efficiency of the vegetation surveying. However, given the typical habitats present and the topographical area of the survey, conditions are still more than adequate to classify the habitats at the level required for the assessment of potential protected and priority species that could be present on site.

All of the species that occur in each habitat would not necessarily be detectable during survey work carried out at any given time of year, since different species are apparent during different seasons. Phase 1 habitat surveys can be undertaken at any time of year; however, the optimum time of year for these surveys to be undertaken is between April and September (inclusive). This survey was undertaken within this optimum period, and is therefore considered to provide a robust assessment of the habitats and species present within the site.



2.0 Legislation, Policy and Conservation Status

2.1 Planning and Biodiversity

Local Authorities have a requirement to consider biodiversity and geological conservation issues when determining planning applications under the following:

- Natural Environment and Rural Communities (NERC) Act (2006)
- The Habitats Directive (EC directive 92/43/EEC)
- Environmental Impact Assessment (85/337/EEC as amended by directive 97/11/EC)
- Strategic Environmental Assessment (2001/42/EEC)
- The Environment Act (1995)

And also the following planning policies:

- National Planning Policy Framework (NPPF) (DCLG 2012)
- ODPM Circular 06/2005 (Defra Circular 01/2005)
- ODPM (March 2006) Planning for Biodiversity and Geological Conservation

2.2 Legalisation and Policy Documents

Relevant legislation (as amended) and policy documents that have been consulted are detailed below:

- Wildlife and Countryside Act 1981 (as amended)
- The Conservation (Natural Habitats, &c.) Species Regulations 2010
- The Countryside and Rights of Way Act 2000
- Natural Environment and Rural Communities Act 2006
- The Protection of Badgers Act 1992
- The Hedgerow Regulations 1997
- National Planning Policy Framework: Conserving and Enhancing the Natural Environment & Conserving and Enhancing the Historic Environment (NPPF)
- UK BAP
- Greater London BAP



2.3 Species Legislation

2.3.1 Bats

All species of bat and their breeding sites or resting places (roosts) are protected under Regulation 41 of The Conservation of Habitats and Species Regulations 2010 and Section 9 of the Wildlife and Countryside Act 1981. It is an offence for anyone to:

- intentionally to kill, injure or handle a bat;
- possess a bat (whether live or dead);
- disturb a roosting bat, or sell or offer a bat for sale without a licence;
- It is also an offence to damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not

(*Natural England 2013*).

A roost is protected whether or not bats are present and any activity or works affecting a roost, even when bats are absent, is likely to be subject to the relevant licence procedure with Natural England.

2.3.2 Water vole (*Arvicola amphibious*)

The water vole has historically received limited protection through inclusion on Schedule 5 of the Wildlife & Countryside Act 1981 (as amended). On the 6th April 2008 legal protection of this species was extended as such it is now an offence to:

- intentionally kill, injure or take (capture) a water vole;
- possess or control a live or dead water vole, or any part of a water vole;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place which water voles use for shelter or protection or disturb water voles while they are using such a place; or
- sell, offer for sale or advertise for live or dead water voles.

(*Natural England, 2013*)



2.3.3 Otter (*Lutra lutra*) Legislation and Planning / Conservation Context

Otters are currently increasing in number and distribution after a prolonged period of decline. They receive protection under both the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2010. Otters and their resting places are fully protected, it is an offence to:

- deliberately, capture, injure or kill them;
- to damage, destroy or obstruct their breeding or resting places;
- or to disturb otters in their breeding or resting places.

(Natural England 2013)

There is, however, provision within the legislation to kill, take, disturb or possess otters or to use prohibited methods to kill or take under a licence in certain defined circumstances, if the issue cannot be resolved by any alternative means.

2.3.4 Great Crested Newts (*Triturus cristatus*)

Great Crested Newts (GCNs) are protected under Schedule 2 of the Habitats Regulations 1994 and Sections 9(1) and 9(4) of the WCA 1981 (as amended).

As such it is illegal to:

- Recklessly kill, injure, capture or disturb a GCN; or
- Obstruct access to, damage or destroy areas where they live or breed.

(Natural England 2013)

The legislation applies to all stages of the life cycle including eggs, larvae and juveniles.

2.3.5 Birds

In the UK, the provisions of the Birds Directive are implemented through the Wildlife & Countryside Act 1981 (as amended), the Conservation (Natural Habitats, & c.) Regulations 1994 (as amended). All wild birds, their nests and eggs are protected it an offence to:

- kill, injure, or take any wild bird;
- take, damage or destroy the nest of any such bird whilst it is in use or being built; or
- take or destroying an egg of any such wild bird.

(Natural England 2013)

The law covers all species of wild birds including common, pest or opportunistic species. Special protection against disturbance during the breeding season is also afforded to those species listed on Schedule 1 of the Act.



2.3.6 Reptiles

Adders, slow worms, grass snakes and common lizards are protected against killing and injuring under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). This legislation makes it illegal to intentionally kill or injure a common reptile. As a result, reptiles must be removed from areas of development and relocated onto suitable release sites before any site works can commence.

Smooth snakes and sand lizards are also protected under schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) making these a European Protected Species. This makes it illegal to carry out the following activities:

- Deliberately or recklessly disturb, capture or kill these animals;
- Deliberately or recklessly take or destroy eggs of these animals;
- Damage or destroy a breeding site or resting place of such a wild animal; or
- Keep, transport, sell or exchange, or offer for sale or exchange, any live or dead animal, or any part of, or anything derived from such a wild animal.

(*Natural England 2013*)

2.3.7 Badgers (*Meles meles*)

Badgers and their setts are fully protected under the Protection of Badgers Act 1992. This Act makes it an offence, *inter alia*, to:

- Wilfully kill, injure or take, or attempt to kill, injure or capture a badger; or
- Interfere with a badger sett by doing any of the following things, intending to do any of these things or be reckless as to whether one's actions would have any of these consequences:
 - Damaging a badger sett or any part of it.
 - Destroying a badger sett.
 - Obstructing access to, or any entrance of, a badger sett.
 - Disturbing a badger when it is occupying a badger sett.

(*Natural England 2013*)



3.0 Methodology

3.1 Data Search

Records of protected species and non-statutory wildlife sites within a 1km radius of the application site were requested from GiGL (Greenspace Information for Great London) and the London Bat Group; additionally, the NBN Gateway database was also searched.

Locations of statutory designated sites were accessed via the government 'MAGIC' website (www.magic.gov.uk).

3.2 Extended Phase 1 Habitat Site Survey

To fulfil the brief, an Extended Phase 1 Habitat Survey was conducted following the methodology of the JNCC (1993) as amended by IEA (1995). Extended Phase 1 Habitat Survey is a standard technique for classifying British habitats. The aim is to provide records of habitats that are of significant ecological value.

Additional Target Notes

Additional target notes were made where applicable to record:

- Key habitat features.
- Ecological features not covered in sufficient detail in the Phase 1 Methodology.
- Important habitats too small to be mapped and to identify dominant species.
- Other features of ecological interest.

3.3 Protected Fauna and Flora Species

Potential signs/suitable habitats for the presence of European and Domestic protected species were recorded.

3.4 Ecological Value and Impact Assessment

Guidelines for ecological value and impact assessment within Volume 11 Section 2 of the Design Manual for Roads and Bridges (DMRB) (Department for Transport, 2009) have been used to place the ecological value of the site in context and assess the likely impacts of the proposed development.

The DMRB is considered by the author to offer a more workable methodology than other assessment methods currently available and is applicable to development situations other than roads and bridges. Criteria used to assign value and assess likely impacts are provided in Appendix II.



4.0 Results : Desktop Survey

4.1 Data search

Biological records data was searched for and requested over a 1km radius from GiGL (Greenspace Information for Great London) and the London Bat Group. Additionally, the NBN Gateway database was also searched however no records were obtained.

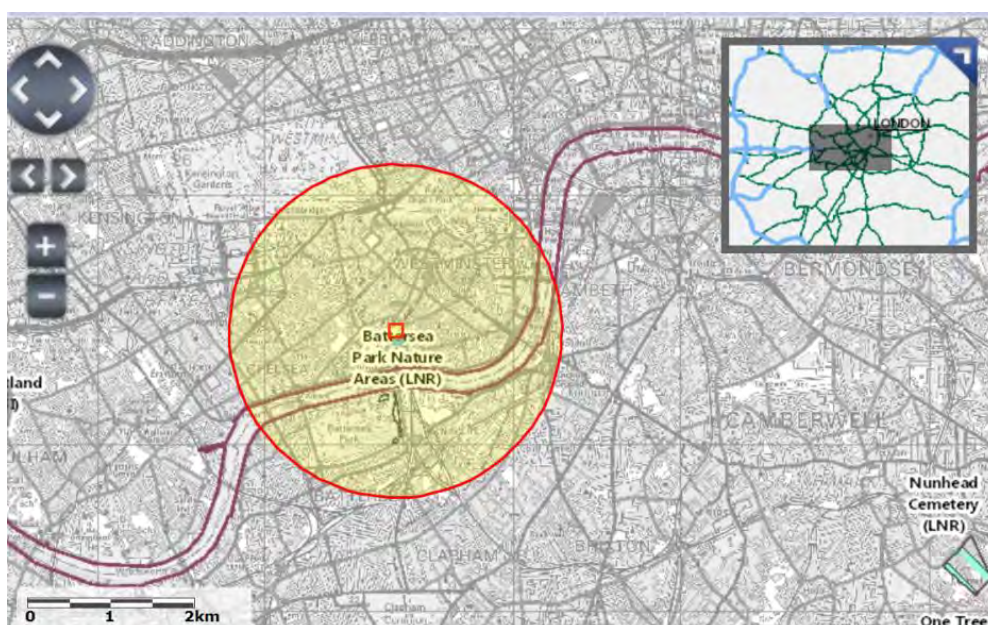
4.1.1 Protected Species Recorded within a 1km Radius

Species	Scientific Name	Grid Ref (SD)	Source	Date
Bats	<i>Vespertilionidae</i>	890m N	GiGL	2004
		958m SE	GiGL	2010
Lesser Noctule	<i>Nyctalus leisleri</i>	914m SE	GiGL	2003
Noctula	<i>Nyctalus noctula</i>	656m NE	GiGL	2008
		914M SE	GiGL	2003
		TQ28 79	LBG	2008
Pipistrelle	<i>Pipistrellus sp.</i>	10 records, 647m SW	GiGL	1998-2006
Common Pipistrelle	<i>Pipistrellus pipistrellus</i>	11 records, closest 647m SW	GiGL	2001-2006
		TQ28 79	LBG	2004
Soprano Pipistrelle	<i>Pipistrellus pygmaeus</i>	426m SE	GiGL	2008
		759M S	GiGL	1998

Table 1: Protected Species Desktop Records

4.1.2 Statutory Designated Nature Conservation Sites

Designated site information drawn from the Multi Agency Geographic Information for the Countryside site www.magic.com confirmed designated sites within the 2km search radius.





Local Nature Reserves:

1. Battersea Park Nature Area

In addition, from the information provided by the Records Provider, the following Sites of Nature Conservation Importance were identified:

1. River Thames and Tidal tributaries (Metropolitan Importance)
2. Battersea Park (Metropolitan Importance)
3. Chelsea Physic Garden (Borough Grade 1 Importance)
4. Chelsea Royal Hospital South Lawn (Borough Grade 1 Importance)
5. Battersea Power Station (Borough Grade 1 Importance)
6. Eccleston Square and Warwick Square, Belgravia (Borough Grade 1 Importance)
7. Royal Hospital Royal Burial Grounds (Borough Grade 2 Importance)
8. Ranelagh Gardens (Borough Grade 2 Importance)



5.0 Results : Field Survey - Plants and Habitats

5.1 Field Survey

The site was surveyed on Monday 9th September 2013; all habitats were recorded and described in terms of dominant and characteristic plant species using Phase 1 Habitat Survey methodology (JNCC, 1993). A fauna and flora species list was compiled (see Appendix III).

The site was searched for field signs of badgers such as runs, latrines and feeding signs and assessed in terms of its suitability for other notable or protected species including bats, otter, water vole, reptiles, amphibians and birds. In addition observations were made to identify any primary UK Biodiversity Action Plan (BAP) species or habitats of local, regional and national importance.

Weather conditions during the survey were occasional heavy rain with a westerly wind; ambient day time temperatures for the day were approximately 17°C.

5.2 Plants and Habitats

Refer to Appendix I for Habitat Map and Appendix III for comprehensive species list and Target Notes.

The following habitats were recorded during the survey:

5.2.1 **A3.1 Scattered Trees**

There are trees spread sporadically throughout the site, species present include mature lime *Tilia sp.*, Cherry *Prunus sp.*, Birch *Betula sp.*, Liquidamber *Liquidamber styraciflua* and Maple *Acer sp.*, with semi mature and new planting of Birch, Ash *Fraxinus ornus*, Alder *Alnus sp.* Honey Locust *Gleditsia triacanthos* and Sycamore *Acer pseudoplatanus*. The majority of the trees are within the centre of the site, set within or around the playground areas. Single specimen or small groups of trees are also present close to the entrances of the flats or within the new amenity areas along the eastern boundary. All trees on site are of high amenity value but of low ecological value, only providing limited opportunities to support nesting birds.



5.2.2 A2.2 Introduced shrubs

Throughout the site are a series of raised beds and landscape planting areas. These are within the centre and northern parts of the site, as well as along the eastern boundary. In the centre of the site is a playground, which has a series of shrubs planted around its boundary and within this area is a number of raised beds which have mature plantings. The species used throughout the site are diverse, evergreen and mainly ornamental species with few native species able to cope with the narrow planting areas and narrow shaded walkways they are planted within. Species that have been used for the majority of these areas are; Spotted Laurel *Aucuba japonica*, Laurel *Prunus rotundifolia*, Choisya, Hebe, Pyracantha, Phormium, Photinia, Ceanothus, Hydrangea and Spirea. Within these beds throughout the site are single specimen plants such as Cycads *Cycas sp.*, Castor Oil Plant *Fatsia japonica*, Mulberry *Morus sp.* and Spanish Broom *Spartium junceum* to add diversity to the site. These areas are of little ecological value apart from creating foraging opportunity for a number of common garden bird species.

5.2.3 J1.2 Amenity Grassland

The site has a series of small lawn areas around the blocks of flats towards the eastern boundary. The central playground has the largest area of grass and this has formal seasonal planting beds, shrubs and trees planted within it. The play equipment appears to have been recently renovated. The diversity of the amenity grassland is very limited and a number of bare areas are present, possibly due to the recent works taken place on the playground. The species present are dominated by Perennial rye grass *Lolium perenne* and Red fescue *Festuca rubra* with occasional Bent *Agrostis stolonifera*. The amenity areas along the eastern boundary with the railway storage yard were not accessible at the time of survey, but were viewable from a distance to summarise the overall habitat. These areas are well maintained and have been divided into areas where raised vegetable beds have been formed. All of the areas of amenity grassland on site are of negligible ecological value.

5.2.4 J2.4 Fence

Throughout the site are a series of sections of amenity areas and these are divided by Steel railing fences. Most are 3m high open railings along the eastern boundary forming the new amenity areas, entrance ways and enclosing courtyards. The all-weather pitch in the southern area has a high 4.5m anti-climb fine grade wire fence around its boundary. In a few places along the southern boundary and south eastern part of the site the fences are mounted on low walls. These features are of negligible ecological value.



5.2.5 J3.6 Building

The buildings on site are all multi storey residential flats. Eleven of the thirteen buildings are constructed using brick and tile mansard roofs with dormers. These have ornate brickwork along the frontage with Ebury Bridge road and shops occupying the ground floors. These buildings are considered to have a series of features suitable for roosting bats, such as lifted and missing tiles, gaps in lead work and hanging tiles on the side of the dormers. Within the centre of the site is a new modern brick with concrete tiled roof building, 'Wellesley and Wainwright House'. The tallest building on the site, at 10 storeys high, is a 1970's pre-fabricated corrugated panel wall building with a flat waterproof membrane roof, 'Edgson House'. These two buildings have limited ecological value to nesting birds or roosting bats and are of negligible ecological value.

5.2.6 J4 Bare Ground/ Tarmac

The site is dominated by a mix of tarmac covered access roads and parking areas along with concrete slabs in parts. In part of the site, in particular the eastern blocks of flats, large pebbles have been set on edge around the bases of some of the buildings. Along the western boundary is a large open car parking area and in the southern area of the site is a large tarmac all weather pitch. All of these areas are of negligible ecological value

5.2.7 Adjacent Habitat

The site is located within the central part of London, with the Victoria railway station complex to the north and marshalling yard along the eastern boundary. To the west and south are other residential tower blocks with a newly completed residential development to the south. Just beyond the buildings to the south are the grounds of the Chelsea Hospital and the Chelsea embankment along the river Thames.



6.0 Results : Field Survey - Fauna

6.1 Bats

There are 30 records for bats within 1 km of the site. The development site itself is considered to be of low value for foraging and of low/ moderate bat roost potential. This is based upon information gained during the survey effort that would suggest that the older buildings with Clay tile mansard roofs and dormers are considered to have a series of features suitable for roosting bats, such as lifted and missing tiles, gaps in lead work and hanging tiles on the side of the dormers.

Building Name (from North to South on the site)	Bat Roost Potential
Rye House	Moderate
Bridge House	Moderate
Westbourne House	Moderate
Pimlico House	Moderate
Mercer House	Moderate
Bucknill House	Moderate
Victoria House	Moderate
Dalton House	Moderate
Wellesley and Wainwright House	Low
Edgson House	Low
Hilliersdon House	Moderate
Doneraile House	Moderate

The site adjoins a railway yard and Victoria mainline station to the east, with Chelsea embankment and gardens to the south of the site. In conjunction with vegetation present on site, these areas offer foraging opportunities for bats. Further dedicated bat surveys will be required in line with current guidelines.

6.2 Water vole (*Arvicola amphibious*) and Otter (*Lutra lutra*)

There are no records of Water vole and no records of Otter within 1km of the site; however, there was no habitat on the site considered suitable to sustain the species and no evidence of their presence was observed. No further survey effort is recommended.



6.3 Great Crested Newt (*Triturus cristatus*)

There are no records of Great Crested Newts within the 1km search. However, the site is generally considered to be of negligible value for the species and using Ordnance Survey Explorer Map 161 London South- Westminster, Greenwich, Croydon, Esher & Twickenham, no ponds are located within 500m of the site, no further survey effort is required.

6.4 Birds

No specially protected Schedule 1 birds or potential breeding habitat were recorded during the Phase 1 Habitat Survey and no further survey effort is recommended.

6.5 Reptiles

There are no reptile records within the 1km search radius of the site. However, the development area is considered to be of negligible suitability for reptiles and no further survey effort is recommended.

6.6 Badger (*Meles meles*)

Biological records indicate no records of badger within 1km of the site. However, no evidence of use of the site by badgers was recorded during the field survey and no further survey effort is required.

6.7 Other fauna

No other fauna was observed during the survey.

6.8 Connectivity to statutory and non-statutory designated sites

The proposed development does not pose any threat to connectivity of statutory and non-statutory sites in the region.



7.0 Ecological Value and Impact Assessment

The following section puts the value of the surveyed site into context and uses DMRB (DoT, 2008) criteria for assessing value and the potential magnitude of impact from the development proposals.

7.1 Ecological value

No UK BAP species was recorded during the Phase 1 Habitat Survey. Site habitats are species low in the wider ecological landscape. The site being affected by the development therefore is considered low in its potential to support protected, UK and local BAP and red data species and sensitive development may improve the site from this perspective.

Using DMRB criteria (Appendix II) the site is considered of low ecological value.

7.2 Impact Assessment

The proposed development will have a minor magnitude of impact upon the site and its ecological features.

Therefore a minor impact upon a site of low value constitutes an ecological impact of slight magnitude.

Considering the size of the site and the nature of the habitats involved the proposed development is considered to pose a slight impact on local biodiversity and this should be offset by biodiversity enhancement associated with landscaping and inclusion of bat and bird boxes within the building structure.



8.0 Recommendations & Conclusion

The Phase One Habitat Survey was undertaken by an experienced ecologist and the following recommendations are made:-

- 8.1** A dedicated bat survey will be required to evaluate the activity and presence of bats within the site and along its boundaries. The buildings on the site have a number of features suitable to support roosting bats and the landscaped areas are of a value for foraging bats.
- 8.2** Bat and bird boxes should be included within the new development design and wherever possible wild flower seed mix (suitably sourced for the area) and native trees and shrubs used to landscape areas surrounding the buildings. Assistance should be engaged from an ecologist in the design and location of bird/bat boxes.

No further survey effort is considered necessary unless changes are made to the development area to be affected over and above those indicated within this report.



9.0 References

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Appendix I

Phase 1 Habitat Map



KEY

- A3.1** Scattered Trees
- J1.2** Amenity grassland
- J1.4** Introduced Shrubs
- J2.4** Fence
- J3.6** Buildings
- J.5** Hardstanding
- Site Boundary
- Target Note (see Target Note table)

Phase 1 Habitat Plan

**Ebury Bridge Estate,
Westminster, London,
SW1W 8SU**

MT Plan No:9530
Date: 12/09/13



Marishal Thompson Group

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Northumberland NE66 2DE








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KEY

-  **A3.1** Scattered Trees
-  **J1.2** Amenity grassland
-  **J1.4** Introduced Shrubs
-  **J3.6** Buildings
-  **J.5** Hardstanding
-  Site Boundary
-  **1** Target Note (see Target Note table)

Phase 1 Habitat Plan 2

**Ebury Bridge Estate,
Westminster, London,
SW1W 8SU**

**MT Plan No:9530
Date: 12/09/13**



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Appendix II

DMRB Assessment Criteria



Table 1. Environmental Value (Sensitivity) and Typical Descriptors

Value (sensitivity)	Typical descriptors
Very High	<ul style="list-style-type: none">• Very high importance and rarity, international scale and very limited potential for substitution.
High	<ul style="list-style-type: none">• High importance and rarity, national scale, and limited potential for substitution.
Medium	<ul style="list-style-type: none">• High or medium importance and rarity, regional scale, limited potential for substitution.
Low (or Lower)	<ul style="list-style-type: none">• Low or medium importance and rarity, local scale.
Negligible	<ul style="list-style-type: none">• Very low importance and rarity, local scale.

Table 2. Magnitude of Impact and Typical Descriptors

Magnitude of impact	Typical criteria descriptors
Major	<ul style="list-style-type: none">• Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features or elements (Adverse).
	<ul style="list-style-type: none">• Large scale or major improvement of resource quality; extensive restoration or enhancement; major improvement of attribute quality (Beneficial).
Moderate	<ul style="list-style-type: none">• Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements (Adverse).
	<ul style="list-style-type: none">• Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality (Beneficial).
Minor	<ul style="list-style-type: none">• Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements (Adverse).
	<ul style="list-style-type: none">• Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring (Beneficial).
Negligible	<ul style="list-style-type: none">• Very minor loss or detrimental alteration to one or more characteristics, features or elements (Adverse).
	<ul style="list-style-type: none">• Very minor benefit to or positive addition of one or more characteristics, features or elements (Beneficial).
No change	<ul style="list-style-type: none">• No loss or alteration of characteristics, features or elements; no observable impact in either direction.



Table 3. Arriving at Significance of Effect Categories

		MAGNITUDE OF IMPACT (DEGREE OF CHANGE)				
		No change	Negligible	Minor	Moderate	Major
ENVIRONMENTAL VALUE (SENSITIVITY)	Very High	Neutral	Slight	Moderate or Large	Large or Very Large	Very Large
	High	Neutral	Slight	Slight or Moderate	Moderate or Large	Large or Very Large
	Medium	Neutral	Neutral or Slight	Slight	Moderate	Moderate or Large
	Low	Neutral	Neutral or Slight	Neutral or Slight	Slight	Slight or Moderate
	Negligible	Neutral	Neutral	Neutral or Slight	Neutral or Slight	Slight



Appendix III

Species List and Target Notes



Extended Phase 1 Habitat Survey: Ebury Bridge Estate, Westminster, London, SW1 8SU

Target Note	Common Name	Latin	Comment
	Alder Liquidamber Manna Ash, Honey locust Holm Oak Sycamore Scots Pine Alder Birch Rowan Whitbeam Willow Hazel Cherry Hawthorn Holly	<i>Alnus</i> <i>Liquidamber styraciflua</i> <i>Fraxinus ornus</i> <i>Gleditsia triacanthos</i> <i>Quercus Ilex</i> <i>Acer pseudoplatanus</i> <i>Pinus Sylvatica</i> <i>Alnus cordata</i> <i>Betula pendula</i> <i>Betula jackmontii</i> <i>Betula papyrifera</i> <i>Sorbus aucuparia</i> <i>Sorbus aria</i> <i>Salix spp</i> <i>Corylus avellana</i> <i>Prunus spp</i> <i>Crataegus monogyna</i> <i>Ilex sp.</i>	Main tree species throughout the site.
	Laurel Ivy Maple Privet Blackthorn Hawthorn Sycamore Yew Elder Hazel Katsura tree	<i>Laurus sp.</i> <i>Hedera helix</i> <i>Acer sp.</i> <i>Ligustrum vulgare</i> <i>Prunus spirea</i> <i>Crataegus sp.</i> <i>Acer Pseudoplatanus</i> <i>Taxus baccata</i> <i>Sambucus nigra</i> <i>Corylus avellana</i> <i>Cercidiphyllum japonicum</i>	The dominant species present within the hedges dividing the gardens.
1	Perennial Rye Grass Cocks Foot False Oat Grass Red fescue Creeping Bent Yarrow Daisy Dandelion Creeping Buttercup Black Medick White Clover Bramble Chickweed Sorrel St. Johns Wort Ground ivy Speedwell Hoary plantain Creeping thistle Spear thistle Nettle Ivy Greater Plantain Ragwort	<i>Lolium perenne</i> <i>Dactylis glomerata</i> <i>Arrhenatherum elatius</i> <i>Festuca rubra</i> <i>Agrostis stolonifera</i> <i>Achillea millefolium</i> <i>Bellis perennis</i> <i>Taraxacum officinale</i> <i>Ranunculus repens</i> <i>Medicago lupulina</i> , <i>Trifolium alba</i> <i>Rubus spp</i> <i>Stellaria media</i> <i>Rumex acetosa</i> <i>Hypericum perforatum</i> <i>Glechoma hederacea</i> <i>Veronica arvensis</i> <i>Plantago media</i> <i>Cirsium arvense</i> <i>Cirsium vulgare</i> <i>Urtica dioica</i> <i>Hedera helix</i> <i>Plantago major</i> <i>Senecio sp</i>	Dominant species present within Amenity Grassland areas throughout the site.
	Mahonia Rosemary Laurel Hebe Birch Spirea Forsythia Lilac, Camellia Hydrangea	<i>Mahonia aquifolium</i> <i>Rosmarinus officinalis</i> <i>Prunus laurocerasus</i> <i>Hebe sp.</i> <i>Betula pendula</i> <i>Spire asp.</i> <i>Forsythia sp.</i> <i>Syringa vulgaris</i> <i>Camellia sp.</i> <i>Hydrangea macrophylla</i>	Dominant ornamental species in borders around site. Around the front of the properties at the base of the buildings are a series of thin ornamental planting beds.



Target Note	Common Name	Latin	Comment
	Buddleja Clematis Dogwood Rose Yucca Spotted Laurel, Choisya, Pyracantha, Phormium, Photinia, Ceanothus, Hydrangea Spirea. Cycads Castor Oil Plant, Spanish Broom Viburnum Christmas Box	<i>Buddeliea sp.</i> <i>Clematis sp.</i> <i>Cornus alba</i> <i>Rosa sp.</i> <i>Yucca sp.</i> <i>Aucuba japonica</i> <i>Choisya sp.</i> <i>Pyracantha sp.</i> <i>Phormium sp.</i> <i>Photinia sp.</i> <i>Ceanothus sp.</i> <i>Hydrangea sp.</i> <i>Spirea sp.</i> <i>Cycas sp</i> <i>Fatsia japonica</i> <i>Spartium junceum</i> <i>Viburnum sp.</i> <i>Sarcococca confusa</i>	
	Spider Plant Regal Pelargonium Cotton Lavender Helenium Rudbeckia	<i>Chlorophytum comosum</i> <i>Euryops actaeus</i> <i>Pelargonium sp.</i> <i>Sedum spathulium</i> <i>Helenium sp.</i> <i>Rudbeckia sp.</i>	Main seasonal bedding that was present at the time and dominate lower flora present.
2	Orchard trees	<i>Malus sp.</i> <i>Pyrus sp.</i> <i>Prunus sp.</i> <i>Morus sp.</i>	Within the new amenity areas along the eastern part of the site and individually in amenity grassland, fruit trees have been planted
BIRDS	Magpie Blackbird Wood pigeon Robin Wren	<i>Pica pica</i> <i>Turdus merula</i> <i>Columba palumbus</i> <i>Erithacus rubecula</i> <i>Troglodytes troglodytes</i>	Seen on the site.



Appendix IV

Background Data Search



Site Check Report

Report Generated on Mon Sep 16 14:42:25 UTC+0100 2013

Local Nature Reserves (England) - points

Reference

1008766

Name

BATTERSEA PARK NATURE AREAS

Hectares

2.9

Hyperlink

http://www.lnr.naturalengland.org.uk/special/lnr/lnr_details.asp?themeid=1008766

Local Nature Reserves (England)

Reference

1008766

Name

BATTERSEA PARK NATURE AREAS

Hectares

2.9

Hyperlink

http://www.lnr.naturalengland.org.uk/special/lnr/lnr_details.asp?themeid=1008766



Appendix V

Photographs



Plate 1: Central playground area has large trees and small shrub planting



Plate 2: Newly created amenity areas along the eastern boundary. (No Access)



Plate 3: Main frontage with Ebury bridge road



Plate 4: walkway through northern part of the site with shrub and tree planting.



Plate 5: Modern flats within the survey area.



Plate 6: Internal courtyards have raised ornamental beds with many containers on balconies



Plate 7: Central access road and smaller shrub beds



Plate 8: Seasonal planting in small beds around the site.



Appendix VI

Ecology Survey Calendar

Ecological Survey Calendar

Activity	Month											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Badger												
Newts												
Reptiles												
Water vole												
Bat activity												
Bat (BRP)												
Crayfish												



Survey period



Optimal period



Unsuitable

Bat BRP = bat roost potential

Many surveys are weather dependent and adverse weather may delay surveys.



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Westminster City Council
Ebury Bridge Estate
Bat Report

Issue | 06 November 2019

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 257461-95

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ARUP

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Tables

Table 1: Classification criteria for bat roosting and commuting and foraging potential

Table 2: Bat dusk emergence and re-entry survey dates and times

Table 3: Key bat automated survey results

Table 4: Bat emergence and re-entry survey results

Figures

Figure 1 Location Plan

Figure 2 Bat Activity Plan

Appendices

Appendix A

Relevant Legislation, Planning Policy and Guidance

Appendix B

Automated Survey Results

Executive Summary

Ove Arup & Partners Ltd. was commissioned by Westminster City Council to undertake bat surveys at Ebury Bridge Estate in Pimlico (central OS grid reference TQ285783) (hereafter referred to as ‘the site’).

This bat report includes the results of scoping, preliminary roost assessment, automated surveys and emergence/re-entry surveys undertaken from June to September 2019. It proceeds to detail how bats are using the site during this time period, as well as proposed mitigation measures, ecological enhancements and further surveys.

The site is used as foraging and commuting habitat for common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus*. There are a number of potential roosting features (PRFs) at roof level within all buildings, except Wainwright House. The survey results suggest the potential presence of day roosts for low numbers of male or non-breeding female common and soprano pipistrelle bats within a number of the houses (Bridge, Dalton, Hillersden and Rye) over the summer period. This type of roost is of low conservation importance.

Wellesley, Hillersdon, Dalton, Mercer and Pimlico houses are due to be demolished from April 2020. A soft strip is required on these houses prior to demolition, supervised by a licensed bat worker. In conjunction with this, bat boxes should be installed prior to demolition in areas of the site that will remain undisturbed. The soft strip should be undertaken under a licence from Natural England. There are two possible approaches to licensing, to be confirmed through consultation with Natural England: a Low Impact Licence; and a European Protected Species Mitigation Licence. Artificial roosting features should also be incorporated into the new building facades to provide permanent roosting opportunities for bats. Other mitigation measures comprise further surveys on those buildings to be demolished in 2023 and sensitive lighting design to minimise disturbance to bats.

Ecological enhancements are recommended to ensure that the site achieves a net-gain in biodiversity, including native planting and strips of grassland and native trees, to provide improved foraging opportunities for bats, and a green corridor across the site to link to National Rail land.

1 Introduction

1.1 Background

This bat report has been prepared by Ove Arup & Partners Ltd. to support design development and planning application preparation at Ebury Bridge Estate.

A Preliminary Ecological Appraisal (PEA), undertaken by Marishal Thompson Group in September 2013¹, identified that the buildings on site have a number of features suitable to support roosting bats and the landscaped areas on site are of potential value to foraging bats.

All species of bat in the UK are protected under the law (see Appendix A). As such, it was recommended that a dedicated bat survey was required to assess the presence or likely absence of roosting bats and inform requirements for mitigation with respect to the planning application and proposed demolition works.

1.2 Site Description

As shown in Figure 1, the site at Ebury Bridge Estate is centred at OS grid reference TQ285783. The site is located in Pimlico, within the City of Westminster. The site is bounded by Ebury Bridge to the north, the major railway lines to the east leading to Victoria Station, access roads to the south, and Ebury Bridge Road to the west. A major redevelopment at Chelsea Barracks is located to the south west. Directly to the south, north west and north of the site are further residential and retail units. The River Thames runs west to east approximately 300m south of the site.

1.3 Proposed Development

The Proposed Development involves the demolition of all existing buildings and removal of existing landscaped areas and scattered trees. Wellesley, Wainwright, Hillersdon, Dalton, Mercer and Pimlico houses are programmed for demolition in 2020, with works commencing in April 2020. Bridge, Rye, Bucknell, Victoria and Doneraile houses are programmed for demolition in 2023.

Approximately 752 residential units, 50% of which would be affordable homes, would be provided in ten proposed buildings. The maximum building height would be 19 storeys (up to a maximum of circa 65m); the five tallest would be located along the eastern edge of the site, backing onto the railway lines. The lower buildings along Ebury Bridge Road would be of a similar height to the existing buildings. Retail space would be provided along Ebury Bridge Road. Space for community use, such as a community centre, would be provided, alongside external community spaces including play spaces. Cycle storage would also be provided.

¹ Marishal Thompson Group (2013) Extended Phase 1 Habitat Survey Ebury Bridge Estate. Re: E0409131407.

1.4 Report Objectives

It is intended that the information in this report will be used to identify and assess the use of the site by bats and subsequent implications for the scheme in terms of mitigation and compensation for any impacts. It also describes opportunities for ecological enhancement. This baseline report can be used as part of a planning application.

2 Methodology

2.1 Bat Scoping

The site was evaluated for its suitability to support foraging, commuting and roosting bats on 4th June 2019, in accordance with current guidance². The criteria set out in Table 1 were used to classify the potential of the site to support bats.

Table 1: Classification criteria for bat roosting and commuting and foraging potential

Suitability	Roosting habitats	Commuting and foraging habitats
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.
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 potential roosting features (PRFs) but with none seen from the	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	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	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.

² Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists; Good Practice Guidelines (3rd Edn). The Bat Conservation Trust, London.

Suitability	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.	<p>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.</p> <p>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.</p> <p>Site is close to and connected to known roosts.</p>

2.2 Preliminary Bat Roost Assessment

A preliminary bat roost assessment of the site was completed on 28th June 2019. This involved an external inspection of buildings and trees from the ground to look for features that bats could use for entry/exit and roosting, and to search for any field signs of bats. The search covered potential roosting features (PRFs) and areas where bat droppings may collect. Signs indicating possible use by bats include:

- scratches and staining around an entry point;
- bat droppings in, around or below an entry point;
- squeaking noises;
- flies around an entry point;
- a distinctive smell of bats; and
- smoothing of surfaces around a cavity.

No internal inspections of rood voids were possible during the preliminary bat roost assessment due to health and safety restrictions that prevented safe access. The buildings have not yet been surveyed for asbestos.

2.3 Automated Bat Survey

An automated bat survey was undertaken between 28th June and 8th July 2019 to assess levels of bat activity associated with PRFs identified during the preliminary bat roost assessment and to inform requirements for further bat survey effort. Nine static detectors (Batlogger A+) were deployed across the site, for 10 nights, as shown in Figure 2. Detectors were positioned at roof level to target PRFs beneath lifted and missing tiles, gaps in lead flashing and hanging tiles on the sides of the dormers. BatExplorer sound analysis software was used to analyse the calls recorded.

2.4 Bat Emergence/Re-entry Surveys

Bat emergence/re-entry surveys were conducted by six Arup surveyors in accordance with current guidance². The surveys were led by a licensed bat worker. Two dusk emergence surveys and one dawn re-entry survey were undertaken in August and September 2019. Dates and times are shown in Table 2. Batlogger M and Anabat Walkabout bat detectors were used, as well as Batbox Duets in tandem with Batlogger A+s.

As shown in Figure 2, three of the six surveyors were positioned at roof level in flats and on balconies overlooking adjacent buildings, with the other three at ground level. Both the number and positioning of surveyors were informed by the bat activity recorded during the automated bat survey.

The dusk emergence surveys started at least fifteen minutes before sunset and finished ninety minutes after sunset. The dawn survey started ninety minutes before sunrise and finished at sunrise.

Table 2: Bat dusk emergence and re-entry survey dates and times

Survey Number	Type of Survey	Date	Sunset/sunrise	Survey start/end time	Weather conditions
1	Dusk emergence	6 th August	20:41	Start time: 20:26 End time: 22:11	17°C, some cloud, dry, light breeze
2	Dusk emergence	29 th August	19:54	Start time: 19:39 End time: 21:24	18°C clear, dry and still with occasional gusts
3	Dawn re-entry	13 th September	06:32	Start time: 05:02 End time: 06:32	14°C some cloud, dry, light breeze

2.5 Limitations

Following the current guidelines², emergence/re-entry surveys should be spread out as far as possible between May and September. Due to time restrictions, the surveys were only spread between August and September. In addition, the optimal viewpoints of PRFs at roof level were obstructed from Surveyors 1 and 2 at ground level (see Figure 2). The sub-optimal timings of the emergence/re-entry surveys, as well as the suboptimal viewpoint of PRFs for surveyors at ground level, have been taken into account when considering mitigation (see Section 5.1).

The majority of PRFs within the site are relatively small (beneath lifted and missing tiles, gaps in lead work and hanging tiles on the side of the dormers) and at roof level of the existing five story residential buildings. Therefore, from ground level, there is limited visibility of these PRFs. However, where necessary, access was arranged for surveyors during the emergence/re-entry surveys to be positioned in top floor flats and balconies so that the PRFs were then clearly visible and thus activity could be recorded at roof level.

During the automated survey, the Batlogger A+ placed on Mercer house (see Figure 2 for building locations) did not record any data due to a technical malfunction. This is a limitation to the survey, as it is not possible to draw any conclusions regarding bat activity near to the building. However, this was taken into account in the subsequent surveys as the emergence/re-entry surveys covered this building on the assumption that it offers the highest level of bat roost potential and similarly this building has been assumed to support roosting bats in development of the mitigation, akin to the other buildings at the site. As such, this was not considered a significant limitation.

During the bat dusk emergence survey on the 6th August, a malfunction with surveyor 2's Batlogger A+ meant that the recordings could not be analysed; however, Surveyor 1 was stood nearby and recorded similar activity to that noted by surveyor 2. Therefore, this was not considered a significant limitation.

3 Results

3.1 Bat Scoping

The site is of low potential for a small number of foraging and commuting bats due to the limited extent of the park and ground level trees. There is limited connectivity to suitable habitat; however, the site's location adjacent to National Rail land provides navigational features towards the River Thames that could be used by bats.

The buildings were assessed to be of moderate potential to support roosting bats due to features at roof level, such as lifted and missing roof tiles, gaps in lead work and hanging tiles on the side of dormers. One building, Wainwright house, was assessed to be of low potential to support roosting bats.

All trees lacked potential PRFs and were assessed to have negligible potential to support roosting bats.

3.2 Preliminary Bat Roost Assessment

No signs of roosting bats were observed during the preliminary bat roost assessment.

In general, gaps in lead flashing were recorded on all buildings except Wainwright, around the chimneys, along the guttering between roof pitches and where dormers were inbuilt into the tiled roofs. However, gaps in lead flashing around dormers were more prominent on Dalton, Mercer, Pimlico and Bridge houses on the southern façades.

In general, low numbers of lifted and missing roof tiles were recorded on all buildings across the estate except Wainwright, and many slipped and missing hanging tiles were recorded on all dormers on Dalton's, Mercer's, Pimlico's and Bridge's southern façades. Additional lifted and missing tiles and gaps in lead flashing were recorded around extraction fans on the roofs on Doneraile and Hillersden houses.

3.3 Automated Bat Survey

The key results of the automated survey are summarised in Table 3 (see Figure 2 for house locations) and provided in full in Appendix B. The temperature range for the duration of the automated survey was 10°C to 34°C.

Table 3: Key bat automated survey results

House*	Summary of recordings
Bridge - southern façade	Recorded soprano pipistrelle <i>Pipistrellus pygmaeus</i> activity close to sunset and sunrise on 29 th June, including from 32 minutes before sunrise and 18 minutes after sunset. Potential chattering in a roost was recorded prior to the echolocation calls approximately 18 minutes after sunset.

House*	Summary of recordings
Pimlico - southern façade	Recorded common pipistrelle <i>Pipistrellus pipistrellus</i> approximately 34 minutes after sunset on 7 th July.
Dalton - southern façade	Recorded most bat activity, with 102 calls recorded over the 11 nights, including a common pipistrelle call 21 minutes after sunset on 6 th July.
Hillersden - western façade	Recorded common pipistrelle calls within 35 minutes of sunrise on three nights, including approximately 21 minutes before sunrise on 6 th July.
Rye – western façade	Recorded bat activity closest to sunrise and sunset, including a common pipistrelle call 16 minutes after sunset on 30 th June.
Donerel - western façade	No bat calls recorded within 35 minutes of sunset or sunrise.
Bucknell - western façade	No bat calls recorded within 35 minutes of sunset or sunrise.
Victoria - southern façade	No bat calls recorded within 35 minutes of sunset or sunrise.

*The automated detector on Mercer malfunctioned; therefore, it is not possible to confirm whether there was bat activity at this location.

3.4 Bat Emergence/Re-entry Surveys

The results of the bat emergence and re-entry surveys are summarised in Table 4. No bats were observed emerging from or entering PRFs during any of the surveys. Regular commuting and foraging activity was recorded nearby the park and ground level trees by Surveyors 1 and 2. Single passes were recorded on different dates by Surveyors 3, 4 and 5. No bats were recorded by Surveyor 6.

Table 4: Bat emergence and re-entry survey results

Survey number	Type of survey	Date	Observations (see Figure 2 for surveyor locations)
1	Dusk Emergence	6 th August	Surveyor 2 heard the first bat, a common pipistrelle commuting at 21:06 (24 minutes after sunset), Surveyor 1 then also heard a common pipistrelle bat at 21:08. From this time, surveyors 1 and 2 recorded common pipistrelle foraging amongst the trees around the park approximately every 5 to 10 minutes until the end of the survey. Surveyors 3, 4, 5 and 6 recorded no bats.
2	Dusk Emergence	29 th August	Surveyor 2 heard the first common pipistrelle commuting at 20:12 (18 minutes after sunset) and Surveyor 1 heard a common pipistrelle commuting at 20:28. No bats were seen. Surveyors 4 and 5 heard one common pipistrelle bat at 20:26 and 20:27 respectively. It was a single pass for both surveyors. Surveyors 3 and 6 recorded no bats.
3	Dawn Re-entry	13 th September	Surveyor 2 heard the first common pipistrelle commuting at 04:55. This activity was heard and occasionally seen by surveyor 1 between 05:16 and 06:14 (18 minutes before sunrise). Surveyor 3 heard one common pipistrelle bat at 05:17. It was a single pass. Surveyors 4, 5 and 6 recorded no bats.

4 Evaluation

No bat roosts or signs of roosting bats were recorded during any of the surveys.

Small numbers of common and soprano pipistrelle bats were recorded during automated surveys and emergence and re-entry surveys. Both common and soprano pipistrelle bats are known to be widely present across London. The species assemblage recorded during the surveys is typical of this type of densely populated urban habitat.

The results of the automated survey in June and July indicate potential roosts nearby Bridge, Dalton, Hillersden and Rye houses (see Figure 2 for building locations). This is due to passes being recorded within the anticipated emergence and re-entry time for pipistrelle species³ as summarised in Table 3 (see also Appendix B for the full results). Potential roost chattering was also recorded prior to echolocation calls approximately 18 minutes after sunset by the automated detector on Bridge house on 29th June.

The bat activity recorded during the dusk emergence surveys and dawn re-entry survey also indicate potential roosts at the site. Continued passes recorded approximately every 10 to 15 minutes during the emergence and re-entry surveys is likely to be one to two bats commuting and foraging nearby to the park and ground level trees. While it is unlikely that any bats returned to or emerged from the facades within view of the surveyors at roof height on Dalton, Mercer and Pimlico houses, there was less certainty for the surveyors at ground level given the height of the buildings and lighting restricting view of the roofs. Furthermore, some parts of the buildings were not in view. Given the timings of the recordings, and since the bats recorded close to sunset and sunrise were not observed to commute on and off site at these times respectively, it is possible that bats roost on site.

Overall, the survey results suggest the potential presence of day roosts for low numbers of male or non-breeding female common and soprano pipistrelle bats within a number of the houses (Bridge, Dalton, Hillersden and Rye) over the summer period. This type of roost is of low conservation importance.

Given the low levels of activity at the site, including the automated survey in late June and early July, the results do not indicate the presence of a larger maternity roost (acknowledging that no emergence or re-entry surveys were possible during the earlier part of the season (May to July)). Low numbers of bats may also roost in the lofts during the hibernation period (November to March), which are currently inaccessible due to the possible presence of asbestos. There are no cavity walls (that pipistrelles could hibernate within) and basements below shop frontages are partly occupied and are not externally accessible, which limit this potential.

³ See AEcol & Andrews Ecology Ltd (2017) 'A review of empirical data in respect of the emergence and return times reported for the UK's 17 native bat species'; and JONES, G. & RYDELL, J. (1994) Foraging strategy and predation risk as factors influencing emergence time in echolocating bats. *Philosophical Transactions of the Royal Society, Series B* 346: 445-455

5 Recommendations

5.1 Mitigation

No further mitigation is required with respect to Wainwright house, which has been assessed to be of low potential to support roosting bats. The following measures relate to the other buildings at the site.

5.1.1 Further surveys

Further emergence and re-entry surveys are recommended on Bridge, Rye, Bucknell, Victoria and Doneraile houses in May to September 2022 as demolition is currently programmed for 2023. These would provide additional survey data and obtain further clarity regarding the status of any roosts at that time, in order to inform the requirements for mitigation.

Internal inspections should also be carried out within the roof voids, but not until these areas are surveyed for asbestos and any asbestos removed. This should apply to all houses, where feasible.

Given that Wellesley, Hillersdon, Dalton, Mercer and Pimlico houses are due to be demolished in 2020, with works due to start in April 2020, further surveys on these houses are not feasible and therefore the following recommendations for soft strip and licencing apply.

The approach for Bridge, Rye, Bucknell, Victoria and Doneraile houses would be developed following the completion of these additional surveys.

5.1.2 Soft strip and bat licencing

A soft strip is required prior to the demolition of the buildings, from April to October inclusive, when bats are active. This would focus on areas at roof level where there are voids and PRFs were recorded. A licenced bat worker will be required on site to supervise the work. These features would be carefully stripped from the buildings until none remain, at which point demolition works would continue without a licensed bat worker present. Contractors would be briefed on the potential presence of bats and a licenced bat worker contacted if a bat is recorded during ongoing works. A method statement will need to be produced in consultation with Natural England.

It is recommended that the soft strip work is completed under a bat licence. This would avoid delays in the programme for demolition in the event that a bat is recorded. If a bat is recorded during the soft strip and a licence is not in place, works would need to halt, and a licence obtained prior to recommencing work. If a bat is discovered during the soft strip and a licence is in place, the bat could be captured by the bat worker and works would recommence. The bat would be kept safely and released at dusk in order to prevent harm and a legal infringement (see Appendix A). There are two potential avenues for licencing, to be confirmed through consultation with Natural England. It should be noted that Natural England are working through a backlog of applications and are therefore it is

expected that the determination period for a licence application would be longer than that set out below:

- Low Impact Licence - an application is made by a registered license holder to register the site with Natural England prior to starting the works. The determination period is 10 working days. Once a licence has been granted, the registered consultant would oversee the works. Hibernation roosts cannot be covered by this licence. Given that it is not currently possible to survey the loft spaces that have potential to support roosting bats over the winter, this route may not be feasible; and
- European Protected Species Mitigation Licence - a project specific licence application is submitted to Natural England and must be approved prior to starting works. The determination period is 30 working days. There is a risk that the application could be declined. If this were the case, the licence would need to be amended and resubmitted, at which point a further 30-day review period applies. Detailed information is required for the licence application, including justification for the development and consideration of alternatives. Considering the proposed timescales for demolition, it is possible that gaining a licence for this work could delay demolition.

5.1.3 Artificial roosting features

To provide opportunities for bats to roost at alternative locations to the buildings, bat boxes should be installed prior to demolition in April 2020 in areas of the site that will remain undisturbed. Bat boxes could be affixed to existing mature trees around the site margins, for example adjacent to Ebury Bridge road and adjacent to National Rail land; however, it may also be necessary to erect artificial poles to support the boxes where natural features are not present. These locations should be agreed in consultation with a suitably qualified ecologist and should be box types that are suitable for pipistrelle species in the summer.

Suitable roosting habitat should be incorporated within the Proposed Development to provide permanent roosting opportunities for bats. To maximise their potential use, bat boxes should be integrated into the facades of the new buildings, facing different directions to provide a variety different temperature conditions. Features facing south-east and south-west are ideal, as they would face the sun for part of the day. They should be located within areas of the site that provide potential foraging and commuting habitat, for example the façades facing vegetated National Rail land or newly created habitats. These features should be designed in consultation with a suitably qualified ecologist.

5.1.4 Sensitive lighting

Detailed external lighting design (street and security lighting) should be designed in consultation with an ecologist to avoid the impacts of lighting habitats across the site. The final design should adhere to the guidance provided in the Institution of

Lighting Professionals *Bats and Artificial Lighting in the UK Guidance Note 08/18*⁴.

Where lighting is required, it should be switched off or reduced where possible during and just after dusk and in the hours before dawn when bat foraging activity peaks. In addition, planting should be designed to minimise light spill with the added benefit of providing a foraging resource to bats (see Section 5.2.1).

5.2 Enhancements

The following enhancements are recommended for the benefit of local biodiversity in accordance with the legislative, planning policy and biodiversity context set out in Appendix A.

5.2.1 Landscape strategy

The planting scheme should incorporate native planting and strips of grassland and native trees, to provide improved foraging opportunities for bats. Furthermore, it should aim to accommodate species that encourage more invertebrates to the site, in particular Coleoptera and Lepidoptera, and subsequently provide additional prey for bats. Where non-native plants species are proposed, these should include species that confer value to bats and other wildlife. Examples include those species found listed on the Royal Horticultural Society's (RHS) 'Perfect for Pollinators'⁵ database, providing nectar sources for pollinating insects. Night-scented flowers attract night-flying insects, which in turn provide foraging opportunities for bats. A mix of annuals and herbaceous perennials are recommended, ensuring that flowers bloom throughout the year.

5.2.2 Green corridor

A green corridor should be provided within the site, to provide foraging habitat and an improved network of commuting and dispersal pathways. These should link habitats on National Rail land to the east of the site, and the new habitats created on site. These should comprise linear features including tree lines, with the lighting designed in accordance with the measures set out in Section 5.1.3.

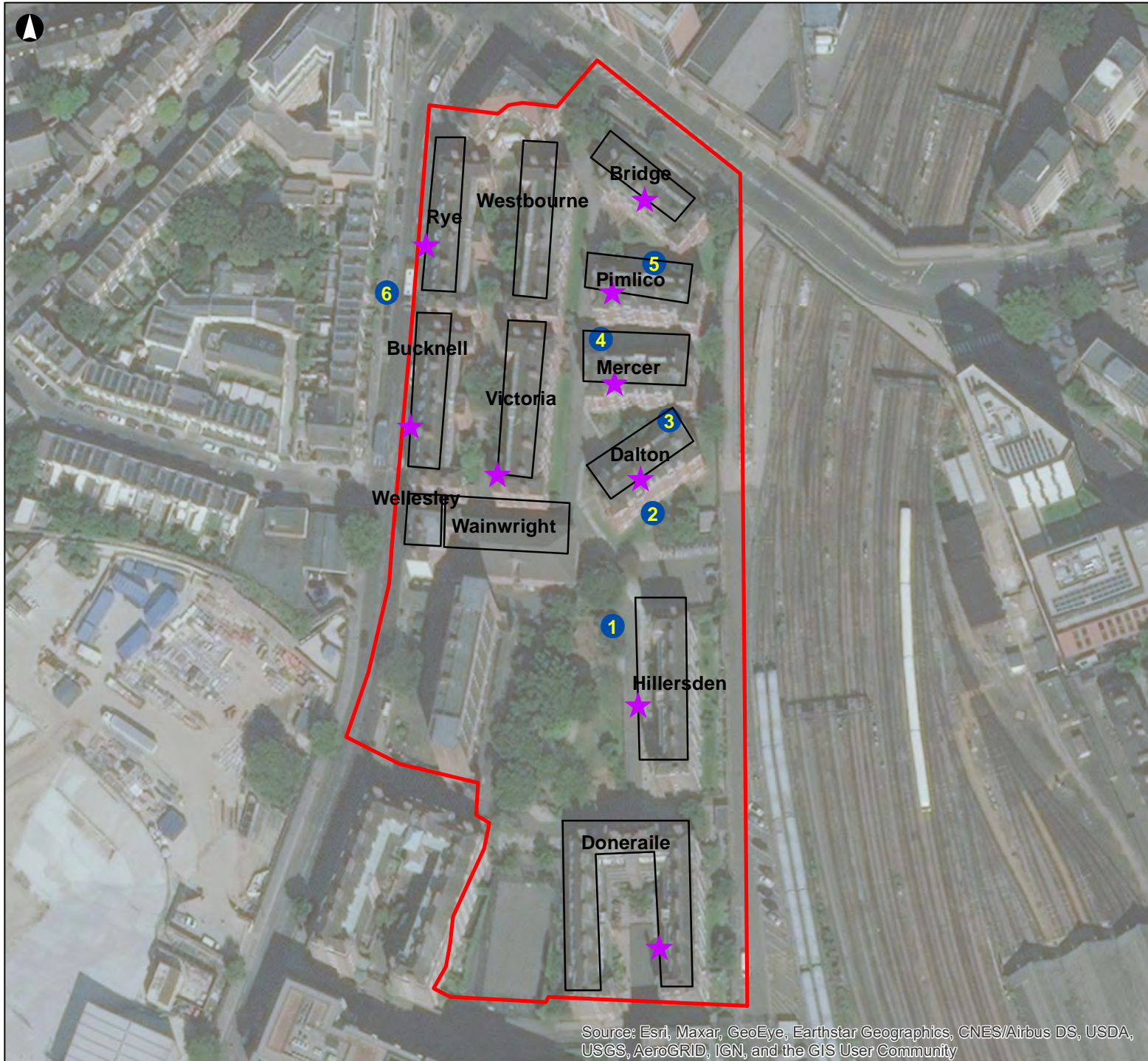
⁴ Institution of Lighting Professionals (ILP) (2018) *Bats and Artificial Lighting in the UK, Bats and the Built Environment Series, Guidance Note 08/18*. ILP, Warwickshire. Key points to ensure the impacts on bats from artificial lighting are minimised within designs are to firstly avoid lighting on key habitats, and secondly apply mitigation measures such as dark buffers, appropriate luminaire specifications, screening and glazing treatments.

⁵ Royal Horticultural Society (RHS) (2018) *Perfect for Pollinators Database*. Last accessed 01/10/2019. Available from: https://www.rhs.org.uk/Plants/Search-Results?form-mode=true&context=l%3Den%26q%3D%2523all%26sl%3DplantForm%26r%3Df%252Fplant_pollination%252Ftrue

Figures

Figure 1 Location Plan





- Legend**
- ★ Bat detectors
 - Buildings
 - Surveyors
 - ▭ Site boundary

Metres				
0	15	30	45	60
P0	2020-06-12			
Rev	Date	By	Chkd	Appd

Coordinate System: British National Grid

ARUP

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London W1T 4BQ
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www.arup.com

Westminster City Council

Ebury Bridge Estate

Bat Emergence/Re-entry Surveyor
Locations

Scale at A4
1:1,500
Role

Suitability
Issue

Arup Job No	257461-95	Rev	P0
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Name
001

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Appendix A

Relevant Legislation, Planning Policy and Guidance

A1 Legislation

The Conservation of Habitats and Species Regulations 2017⁶ (Habitats and Species Regulations) provides protection for European Protected Species (EPS) and their habitats, including bats. The Wildlife and Countryside Act 1981⁷ (as amended) (WCA) and the Habitats and Species Regulations 2017 make it an offence to:

- Intentionally or recklessly capture, kill or injure bats;
- Deliberately disturb bats (including when they are outside their roosts) or intentionally or recklessly disturb roosting bats; and
- Damage or destroy their roosts or intentionally or recklessly obstruct access to their roosts (whether bats are present or not).

Under the Habitats and Species Regulations, disturbance includes in particular any disturbance which is likely to impair their ability to survive; breed or reproduce; rear or nurture their young; or hibernate or to affect significantly the local distribution or abundance of the species.

A2 Planning Policy

The National Planning Policy Framework⁸ (NPPF) encourages developments to ensure no net loss to biodiversity and to maximise opportunities for biodiversity through enhancement measures. The NPPF is implemented at the local level in this instance by Westminster's City Plan⁹, wherein Policy S38 requires development proposals to create opportunities, where possible, for attracting biodiversity and habitat creation.

A3 Guidance

Some bat species are also listed under relevant Biodiversity Action Plans (BAP), which identify priorities for conservation as required under the Convention on Biological Diversity in 1992¹⁰. The UK BAP¹¹ is relevant in the context of Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006¹², meaning that Priority Species and Habitats are material considerations in planning. Priority Species under the former UK BAP of relevance to this report are soprano pipistrelle *Pipistrellus pygmaeus*. The former London BAP¹³ includes

⁶ Her Majesty's Stationary Office (HMSO), (2017); 'The Conservation of Habitats and Species Regulations 2017.'

⁷ HMSO (1981); 'The Wildlife and Countryside Act 1981.'

⁸ DCLG (2012) National Planning Policy Framework. ISBN: 978- 1-4098-3413-7

⁹ Westminster's City Plan (2013). Available at: <https://www.westminster.gov.uk/westminsters-city-plan-strategic-policies>

¹⁰ United Nations (UN), (1992); 'Convention on Biological Diversity.'

¹¹ UK Biodiversity Partnership (2011); 'UK Biodiversity Action Plan.'

¹² HMSO (2006); 'Natural Environment and Rural Communities Act.'

¹³ Greenspace Information for Greater London, (2018); 'London's Biodiversity Action Plan.'

Species Action Plans (SAPs) aiming to conserve and where possible increase the population and distribution of certain species, including bats.

The NERC Act 2006 puts an obligation on public authorities to have regard for the conservation of species and habitats of principal importance for the purpose of conserving biodiversity under Section 41. Soprano pipistrelle is on the Section 41 list.

Westminster City Council is a partner in the Westminster Biodiversity Partnership. As a result, the habitats and species which are conservation priorities within the borough are listed in the Westminster Local Biodiversity Action Plan¹⁴ (LBAP). The list includes habitats and species of principal importance. Those listed and that are relevant to this assessment include:

- protect, enhance and create opportunities for biodiversity in the built environment;
- protect and enhance biodiversity in private gardens and squares including the retention of existing veteran trees; and
- protect bats and increase species range through habitat management.

¹⁴ Westminster Local Biodiversity Action Plan. Available at:
<https://www.westminster.gov.uk/biodiversity-action-plan>

Appendix B

Automated Survey Results

House	Date	Time	Sunrise	Sunset	Time after sunset	Time before sunrise	Bat Species
Bridge	29/06/2019	03:00:19	04:46:00	21:21:00		01:45:41	Pipistrellus pipistrellus
Bridge	29/06/2019	03:11:09	04:46:00	21:21:00		01:34:51	Pipistrellus pipistrellus
Bridge	29/06/2019	03:46:11	04:46:00	21:21:00		00:59:49	Pipistrellus pygmaeus
Bridge	29/06/2019	03:48:13	04:46:00	21:21:00		00:57:47	Pipistrellus pygmaeus
Bridge	29/06/2019	03:49:01	04:46:00	21:21:00		00:56:59	Pipistrellus pygmaeus
Bridge	29/06/2019	03:49:25	04:46:00	21:21:00		00:56:35	Pipistrellus pygmaeus
Bridge	29/06/2019	03:49:50	04:46:00	21:21:00		00:56:10	Pipistrellus pygmaeus
Bridge	29/06/2019	03:50:14	04:46:00	21:21:00		00:55:46	Pipistrellus pygmaeus
Bridge	29/06/2019	03:50:38	04:46:00	21:21:00		00:55:22	Pipistrellus pygmaeus
Bridge	29/06/2019	03:51:51	04:46:00	21:21:00		00:54:09	Pipistrellus pygmaeus
Bridge	29/06/2019	03:52:39	04:46:00	21:21:00		00:53:21	Pipistrellus pygmaeus
Bridge	29/06/2019	04:01:58	04:46:00	21:21:00		00:44:02	Pipistrellus pygmaeus
Bridge	29/06/2019	04:07:38	04:46:00	21:21:00		00:38:22	Pipistrellus pygmaeus
Bridge	29/06/2019	04:08:02	04:46:00	21:21:00		00:37:58	Pipistrellus pygmaeus
Bridge	29/06/2019	04:08:27	04:46:00	21:21:00		00:37:33	Pipistrellus pygmaeus
Bridge	29/06/2019	04:08:51	04:46:00	21:21:00		00:37:09	Pipistrellus pygmaeus
Bridge	29/06/2019	04:09:15	04:46:00	21:21:00		00:36:45	Pipistrellus pygmaeus
Bridge	29/06/2019	04:09:39	04:46:00	21:21:00		00:36:21	Pipistrellus pygmaeus
Bridge	29/06/2019	04:13:18	04:46:00	21:21:00		00:32:42	Pipistrellus pygmaeus
Bridge	29/06/2019	04:13:43	04:46:00	21:21:00		00:32:17	Pipistrellus pygmaeus
Bridge	29/06/2019	21:38:57	04:46:00	21:21:00	00:17:57		Insufficient
Bridge	29/06/2019	21:39:21	04:46:00	21:21:00	00:18:21		Insufficient
Bridge	29/06/2019	21:39:45	04:46:00	21:21:00	00:18:45		Pipistrellus pygmaeus
Bridge	29/06/2019	21:40:10	04:46:00	21:21:00	00:19:10		Pipistrellus pygmaeus
Bridge	29/06/2019	21:40:34	04:46:00	21:21:00	00:19:34		Pipistrellus pygmaeus
Bridge	29/06/2019	21:40:58	04:46:00	21:21:00	00:19:58		Pipistrellus pygmaeus
Bridge	29/06/2019	21:41:23	04:46:00	21:21:00	00:20:23		Pipistrellus pygmaeus
Bridge	29/06/2019	21:41:47	04:46:00	21:21:00	00:20:47		Pipistrellus pygmaeus
Bridge	29/06/2019	21:42:12	04:46:00	21:21:00	00:21:12		Pipistrellus pygmaeus
Bridge	29/06/2019	21:42:36	04:46:00	21:21:00	00:21:36		Pipistrellus pygmaeus
Bridge	29/06/2019	21:43:00	04:46:00	21:21:00	00:22:00		Pipistrellus pygmaeus
Bridge	29/06/2019	21:43:25	04:46:00	21:21:00	00:22:25		Pipistrellus pygmaeus
Bridge	29/06/2019	21:43:49	04:46:00	21:21:00	00:22:49		Pipistrellus pygmaeus
Bridge	01/07/2019	22:59:35	04:47:00	21:20:00	01:39:35		Pipistrellus pipistrellus
Dalton	28/06/2019	21:57:00	04:45:00	21:21:00	00:36:00		Pipistrellus pipistrellus
Dalton	28/06/2019	22:18:24	04:45:00	21:21:00	00:57:24		Pipistrellus pipistrellus
Dalton	28/06/2019	23:06:32	04:45:00	21:21:00	01:45:32		Pipistrellus pipistrellus
Dalton	29/06/2019	02:42:48	04:46:00	21:21:00		02:03:12	Pipistrellus pipistrellus
Dalton	29/06/2019	03:11:17	04:46:00	21:21:00		01:34:43	Pipistrellus pipistrellus
Dalton	29/06/2019	03:27:42	04:46:00	21:21:00		01:18:18	Pipistrellus pipistrellus
Dalton	29/06/2019	03:28:20	04:46:00	21:21:00		01:17:40	Pipistrellus pipistrellus
Dalton	29/06/2019	03:28:23	04:46:00	21:21:00		01:17:37	Pipistrellus pipistrellus
Dalton	29/06/2019	04:14:27	04:46:00	21:21:00		00:31:33	Pipistrellus pipistrellus
Dalton	29/06/2019	21:53:00	04:46:00	21:21:00	00:32:00		Pipistrellus pipistrellus
Dalton	29/06/2019	22:07:36	04:46:00	21:21:00	00:46:36		Pipistrellus pipistrellus
Dalton	29/06/2019	22:08:19	04:46:00	21:21:00	00:47:19		Pipistrellus pipistrellus
Dalton	29/06/2019	22:27:11	04:46:00	21:21:00	01:06:11		Pipistrellus pipistrellus
Dalton	29/06/2019	22:50:33	04:46:00	21:21:00	01:29:33		Pipistrellus pipistrellus
Dalton	29/06/2019	22:50:35	04:46:00	21:21:00	01:29:35		Pipistrellus pipistrellus
Dalton	29/06/2019	23:25:42	04:46:00	21:21:00	02:04:42		Pipistrellus pipistrellus
Dalton	30/06/2019	02:48:31	04:46:00	21:21:00		01:57:29	Pipistrellus pipistrellus
Dalton	30/06/2019	02:48:34	04:46:00	21:21:00		01:57:26	Pipistrellus pipistrellus
Dalton	30/06/2019	04:07:42	04:46:00	21:21:00		00:38:18	Pipistrellus pipistrellus
Dalton	30/06/2019	22:00:35	04:46:00	21:21:00	00:39:35		Pipistrellus pipistrellus
Dalton	30/06/2019	22:17:34	04:46:00	21:21:00	00:56:34		Pipistrellus pipistrellus
Dalton	01/07/2019	02:50:46	04:47:00	21:20:00		01:56:14	Pipistrellus pipistrellus
Dalton	01/07/2019	03:40:56	04:47:00	21:20:00		01:06:04	Pipistrellus pipistrellus
Dalton	01/07/2019	04:04:59	04:47:00	21:20:00		00:42:01	Pipistrellus pipistrellus
Dalton	01/07/2019	21:49:12	04:47:00	21:20:00	00:29:12		Pipistrellus pipistrellus
Dalton	01/07/2019	22:25:24	04:47:00	21:20:00	01:05:24		Pipistrellus pipistrellus
Dalton	02/07/2019	04:14:12	04:48:00	21:20:00		00:33:48	Pipistrellus pipistrellus
Dalton	02/07/2019	21:53:56	04:48:00	21:20:00	00:33:56		Pipistrellus pipistrellus
Dalton	02/07/2019	21:54:03	04:48:00	21:20:00	00:34:03		Pipistrellus pipistrellus
Dalton	02/07/2019	21:54:11	04:48:00	21:20:00	00:34:11		Pipistrellus pipistrellus
Dalton	02/07/2019	21:54:24	04:48:00	21:20:00	00:34:24		Pipistrellus pipistrellus

Dalton	02/07/2019	21:54:27	04:48:00	21:20:00	00:34:27		Pipistrellus pipistrellus
Dalton	02/07/2019	21:54:36	04:48:00	21:20:00	00:34:36		Pipistrellus pipistrellus
Dalton	02/07/2019	21:54:49	04:48:00	21:20:00	00:34:49		Pipistrellus pipistrellus
Dalton	02/07/2019	21:55:00	04:48:00	21:20:00	00:35:00		Pipistrellus pipistrellus
Dalton	02/07/2019	21:55:04	04:48:00	21:20:00	00:35:04		Pipistrellus pipistrellus
Dalton	02/07/2019	22:17:35	04:48:00	21:20:00	00:57:35		Pipistrellus pipistrellus
Dalton	02/07/2019	22:17:42	04:48:00	21:20:00	00:57:42		Pipistrellus pipistrellus
Dalton	03/07/2019	04:15:45	04:48:00	21:20:00		00:32:15	Pipistrellus pipistrellus
Dalton	03/07/2019	21:51:07	04:48:00	21:20:00	00:31:07		Pipistrellus pipistrellus
Dalton	03/07/2019	22:15:06	04:48:00	21:20:00	00:55:06		Pipistrellus pipistrellus
Dalton	03/07/2019	22:28:18	04:48:00	21:20:00	01:08:18		Pipistrellus pipistrellus
Dalton	03/07/2019	22:28:42	04:48:00	21:20:00	01:08:42		Pipistrellus pipistrellus
Dalton	03/07/2019	22:28:45	04:48:00	21:20:00	01:08:45		Pipistrellus pipistrellus
Dalton	03/07/2019	22:51:53	04:48:00	21:20:00	01:31:53		Pipistrellus pipistrellus
Dalton	03/07/2019	23:11:41	04:48:00	21:20:00	01:51:41		Pipistrellus pipistrellus
Dalton	03/07/2019	23:24:09	04:48:00	21:20:00	02:04:09		Pipistrellus pipistrellus
Dalton	04/07/2019	02:30:23	04:49:00	21:19:00		02:18:37	Pipistrellus pipistrellus
Dalton	04/07/2019	02:48:21	04:49:00	21:19:00		02:00:39	Pipistrellus pipistrellus
Dalton	04/07/2019	04:15:34	04:49:00	21:19:00		00:33:26	Pipistrellus pipistrellus
Dalton	04/07/2019	21:45:23	04:49:00	21:19:00	00:26:23		Pipistrellus pipistrellus
Dalton	04/07/2019	22:14:12	04:49:00	21:19:00	00:55:12		Pipistrellus pipistrellus
Dalton	04/07/2019	22:15:31	04:49:00	21:19:00	00:56:31		Pipistrellus pipistrellus
Dalton	04/07/2019	22:15:34	04:49:00	21:19:00	00:56:34		Pipistrellus pipistrellus
Dalton	04/07/2019	22:15:43	04:49:00	21:19:00	00:56:43		Pipistrellus pipistrellus
Dalton	04/07/2019	22:15:56	04:49:00	21:19:00	00:56:56		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:02	04:49:00	21:19:00	00:57:02		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:07	04:49:00	21:19:00	00:57:07		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:10	04:49:00	21:19:00	00:57:10		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:13	04:49:00	21:19:00	00:57:13		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:15	04:49:00	21:19:00	00:57:15		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:19	04:49:00	21:19:00	00:57:19		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:21	04:49:00	21:19:00	00:57:21		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:23	04:49:00	21:19:00	00:57:23		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:37	04:49:00	21:19:00	00:57:37		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:41	04:49:00	21:19:00	00:57:41		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:45	04:49:00	21:19:00	00:57:45		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:52	04:49:00	21:19:00	00:57:52		Pipistrellus pipistrellus
Dalton	04/07/2019	22:16:55	04:49:00	21:19:00	00:57:55		Pipistrellus pipistrellus
Dalton	04/07/2019	23:03:44	04:49:00	21:19:00	01:44:44		Pipistrellus pipistrellus
Dalton	04/07/2019	23:05:07	04:49:00	21:19:00	01:46:07		Pipistrellus pipistrellus
Dalton	04/07/2019	23:05:09	04:49:00	21:19:00	01:46:09		Pipistrellus pipistrellus
Dalton	04/07/2019	23:05:11	04:49:00	21:19:00	01:46:11		Pipistrellus pipistrellus
Dalton	04/07/2019	23:05:14	04:49:00	21:19:00	01:46:14		Pipistrellus pipistrellus
Dalton	04/07/2019	23:27:07	04:49:00	21:19:00	02:08:07		Pipistrellus pipistrellus
Dalton	04/07/2019	23:27:12	04:49:00	21:19:00	02:08:12		Pipistrellus pipistrellus
Dalton	05/07/2019	02:45:39	04:50:00	21:19:00		02:04:21	Pipistrellus pipistrellus
Dalton	05/07/2019	03:04:08	04:50:00	21:19:00		01:45:52	Pipistrellus pipistrellus
Dalton	05/07/2019	03:10:08	04:50:00	21:19:00		01:39:52	Pipistrellus pipistrellus
Dalton	05/07/2019	03:17:34	04:50:00	21:19:00		01:32:26	Pipistrellus pipistrellus
Dalton	05/07/2019	03:17:37	04:50:00	21:19:00		01:32:23	Pipistrellus pipistrellus
Dalton	05/07/2019	03:36:04	04:50:00	21:19:00		01:13:56	Pipistrellus pipistrellus
Dalton	05/07/2019	04:21:32	04:50:00	21:19:00		00:28:28	Pipistrellus pipistrellus
Dalton	05/07/2019	21:46:32	04:50:00	21:19:00	00:27:32		Pipistrellus pipistrellus
Dalton	05/07/2019	22:56:12	04:50:00	21:19:00	01:37:12		Pipistrellus pipistrellus
Dalton	06/07/2019	02:34:41	04:51:00	21:18:00		02:16:19	Pipistrellus pipistrellus
Dalton	06/07/2019	02:36:01	04:51:00	21:18:00		02:14:59	Pipistrellus pipistrellus
Dalton	06/07/2019	03:05:58	04:51:00	21:18:00		01:45:02	Pipistrellus pipistrellus
Dalton	06/07/2019	03:10:29	04:51:00	21:18:00		01:40:31	Pipistrellus pipistrellus
Dalton	06/07/2019	03:10:31	04:51:00	21:18:00		01:40:29	Pipistrellus pipistrellus
Dalton	06/07/2019	03:14:51	04:51:00	21:18:00		01:36:09	Pipistrellus pipistrellus
Dalton	06/07/2019	03:21:46	04:51:00	21:18:00		01:29:14	Pipistrellus pipistrellus
Dalton	06/07/2019	04:03:34	04:51:00	21:18:00		00:47:26	Pipistrellus pipistrellus
Dalton	06/07/2019	04:21:08	04:51:00	21:18:00		00:29:52	Pipistrellus pipistrellus
Dalton	06/07/2019	21:39:16	04:51:00	21:18:00	00:21:16		Pipistrellus pipistrellus
Dalton	06/07/2019	22:23:13	04:51:00	21:18:00	01:05:13		Pipistrellus pipistrellus
Dalton	07/07/2019	02:47:18	04:52:00	21:18:00		02:04:42	Pipistrellus pipistrellus

Dalton	07/07/2019	21:44:14	04:52:00	21:18:00	00:26:14		Pipistrellus pipistrellus
Dalton	07/07/2019	22:22:17	04:52:00	21:18:00	01:04:17		Pipistrellus pipistrellus
Dalton	07/07/2019	23:10:27	04:52:00	21:18:00	01:52:27		Pipistrellus pipistrellus
Dalton	08/07/2019	02:36:50	04:53:00	21:17:00		02:16:10	Pipistrellus pipistrellus
Dalton	08/07/2019	04:18:00	04:53:00	21:17:00		00:35:00	Pipistrellus pipistrellus
Pimlico	29/06/2019	03:00:24	04:46:00	21:21:00		01:45:36	Pipistrellus pipistrellus
Pimlico	29/06/2019	03:44:04	04:46:00	21:21:00		01:01:56	Pipistrellus pygmaeus
Pimlico	29/06/2019	03:45:56	04:46:00	21:21:00		01:00:04	Pipistrellus pygmaeus
Pimlico	29/06/2019	03:50:56	04:46:00	21:21:00		00:55:04	Pipistrellus pygmaeus
Pimlico	29/06/2019	03:52:09	04:46:00	21:21:00		00:53:51	Pipistrellus pygmaeus
Pimlico	02/07/2019	22:15:22	04:48:00	21:20:00	00:55:22		Pipistrellus pipistrellus
Pimlico	02/07/2019	22:17:52	04:48:00	21:20:00	00:57:52		Pipistrellus pipistrellus
Pimlico	03/07/2019	22:19:30	04:48:00	21:20:00	00:59:30		Pipistrellus pipistrellus
Pimlico	03/07/2019	23:11:23	04:48:00	21:20:00	01:51:23		Pipistrellus pipistrellus
Pimlico	04/07/2019	22:02:04	04:49:00	21:19:00	00:43:04		Nyctalus noctula
Pimlico	04/07/2019	22:05:58	04:49:00	21:19:00	00:46:58		Pipistrellus pipistrellus
Pimlico	04/07/2019	22:17:27	04:49:00	21:19:00	00:58:27		Pipistrellus pipistrellus
Pimlico	04/07/2019	23:05:27	04:49:00	21:19:00	01:46:27		Pipistrellus pipistrellus
Pimlico	04/07/2019	23:05:30	04:49:00	21:19:00	01:46:30		Pipistrellus pipistrellus
Pimlico	04/07/2019	23:06:26	04:49:00	21:19:00	01:47:26		Pipistrellus pipistrellus
Pimlico	04/07/2019	23:07:02	04:49:00	21:19:00	01:48:02		Pipistrellus pipistrellus
Pimlico	05/07/2019	22:32:38	04:50:00	21:19:00	01:13:38		Pipistrellus pipistrellus
Pimlico	06/07/2019	02:35:55	04:51:00	21:18:00		02:15:05	Pipistrellus spec.
Pimlico	07/07/2019	21:52:02	04:52:00	21:18:00	00:34:02		Pipistrellus pipistrellus
Pimlico	07/07/2019	21:52:18	04:52:00	21:18:00	00:34:18		Pipistrellus pipistrellus
Pimlico	07/07/2019	22:20:18	04:52:00	21:18:00	01:02:18		Pipistrellus pipistrellus
Pimlico	07/07/2019	22:20:23	04:52:00	21:18:00	01:02:23		Pipistrellus pipistrellus
Pimlico	07/07/2019	23:15:51	04:52:00	21:18:00	01:57:51		Pipistrellus pipistrellus
Bucknell	29/06/2019	02:59:13	04:46:00	21:21:00		01:46:47	Pipistrellus pipistrellus
Bucknell	29/06/2019	03:10:05	04:46:00	21:21:00		01:35:55	Pipistrellus pipistrellus
Bucknell	01/07/2019	02:59:53	04:47:00	21:20:00		01:47:07	Pipistrellus pipistrellus
Bucknell	01/07/2019	23:20:22	04:47:00	21:20:00	02:00:22		Pipistrellus pipistrellus
Bucknell	03/07/2019	22:26:12	04:48:00	21:20:00	01:06:12		Pipistrellus pipistrellus
Bucknell	04/07/2019	03:16:39	04:49:00	21:19:00		01:32:21	Pipistrellus pipistrellus
Bucknell	06/07/2019	02:33:29	04:51:00	21:18:00		02:17:31	Pipistrellus pipistrellus
Rye	29/06/2019	22:51:00	04:46:00	21:21:00	01:30:00		Pipistrellus pipistrellus
Rye	30/06/2019	04:15:15	04:46:00	21:21:00		00:30:45	Pipistrellus pipistrellus
Rye	30/06/2019	21:37:04	04:46:00	21:21:00	00:16:04		Pipistrellus pipistrellus
Rye	01/07/2019	03:45:02	04:47:00	21:20:00		01:01:58	Pipistrellus pipistrellus
Rye	02/07/2019	02:32:19	04:48:00	21:20:00		02:15:41	Pipistrellus pipistrellus
Rye	02/07/2019	23:24:56	04:48:00	21:20:00	02:04:56		Pipistrellus pipistrellus
Rye	03/07/2019	22:25:24	04:48:00	21:20:00	01:05:24		Pipistrellus pipistrellus
Rye	03/07/2019	22:44:33	04:48:00	21:20:00	01:24:33		Pipistrellus pipistrellus
Rye	04/07/2019	22:50:27	04:49:00	21:19:00	01:31:27		Pipistrellus pipistrellus
Rye	04/07/2019	23:01:42	04:49:00	21:19:00	01:42:42		Pipistrellus pipistrellus
Rye	05/07/2019	02:55:28	04:50:00	21:19:00		01:54:32	Pipistrellus pipistrellus
Rye	05/07/2019	22:44:53	04:50:00	21:19:00	01:25:53		Pipistrellus pipistrellus
Rye	06/07/2019	04:03:51	04:51:00	21:18:00		00:47:09	Pipistrellus pipistrellus
Rye	06/07/2019	22:14:38	04:51:00	21:18:00	00:56:38		Pipistrellus pipistrellus
Rye	07/07/2019	21:50:52	04:52:00	21:18:00	00:32:52		Pipistrellus pipistrellus
Rye	07/07/2019	22:33:09	04:52:00	21:18:00	01:15:09		Pipistrellus pipistrellus
Rye	07/07/2019	23:02:15	04:52:00	21:18:00	01:44:15		Pipistrellus spec.
Rye	08/07/2019	03:34:31	04:53:00	21:17:00		01:18:29	Pipistrellus pipistrellus
Hillersden	28/06/2019	21:57:09	04:45:00	21:21:00	00:36:09		Pipistrellus pipistrellus
Hillersden	29/06/2019	03:27:42	04:46:00	21:21:00		01:18:18	Pipistrellus pipistrellus
Hillersden	29/06/2019	03:28:26	04:46:00	21:21:00		01:17:34	Pipistrellus pipistrellus
Hillersden	29/06/2019	21:53:20	04:46:00	21:21:00	00:32:20		Pipistrellus pipistrellus
Hillersden	29/06/2019	23:25:59	04:46:00	21:21:00	02:04:59		Pipistrellus pipistrellus
Hillersden	01/07/2019	03:40:59	04:47:00	21:20:00		01:06:01	Pipistrellus pipistrellus
Hillersden	03/07/2019	22:19:49	04:48:00	21:20:00	00:59:49		Pipistrellus pipistrellus
Hillersden	03/07/2019	22:28:49	04:48:00	21:20:00	01:08:49		Pipistrellus pipistrellus
Hillersden	03/07/2019	23:11:54	04:48:00	21:20:00	01:51:54		Pipistrellus pipistrellus
Hillersden	04/07/2019	02:48:27	04:49:00	21:19:00		02:00:33	Pipistrellus pipistrellus
Hillersden	04/07/2019	03:17:59	04:49:00	21:19:00		01:31:01	Pipistrellus pipistrellus
Hillersden	05/07/2019	02:45:51	04:50:00	21:19:00		02:04:09	Pipistrellus pipistrellus
Hillersden	06/07/2019	02:36:11	04:51:00	21:18:00		02:14:49	Pipistrellus pipistrellus

Hillersden	06/07/2019	21:39:38	04:51:00	21:18:00	00:21:38		Pipistrellus pipistrellus
Hillersden	07/07/2019	21:44:29	04:52:00	21:18:00	00:26:29		Pipistrellus pipistrellus
Victoria	01/07/2019	02:39:50	04:47:00	21:20:00		02:07:10	Pipistrellus pipistrellus
Victoria	01/07/2019	02:59:20	04:47:00	21:20:00		01:47:40	Pipistrellus pipistrellus
Victoria	01/07/2019	02:59:30	04:47:00	21:20:00		01:47:30	Pipistrellus pipistrellus
Victoria	01/07/2019	02:59:34	04:47:00	21:20:00		01:47:26	Pipistrellus pipistrellus
Victoria	03/07/2019	22:26:19	04:48:00	21:20:00	01:06:19		Pipistrellus pipistrellus
Victoria	03/07/2019	22:26:22	04:48:00	21:20:00	01:06:22		Pipistrellus pipistrellus
Victoria	03/07/2019	22:26:33	04:48:00	21:20:00	01:06:33		Pipistrellus pipistrellus
Victoria	03/07/2019	22:50:21	04:48:00	21:20:00	01:30:21		Pipistrellus pipistrellus
Victoria	03/07/2019	22:50:26	04:48:00	21:20:00	01:30:26		Pipistrellus pipistrellus
Victoria	03/07/2019	22:50:28	04:48:00	21:20:00	01:30:28		Pipistrellus pipistrellus
Victoria	04/07/2019	03:16:30	04:49:00	21:19:00		01:32:30	Pipistrellus pipistrellus
Victoria	04/07/2019	22:01:45	04:49:00	21:19:00	00:42:45		Pipistrellus pipistrellus
Victoria	04/07/2019	23:02:18	04:49:00	21:19:00	01:43:18		Pipistrellus pipistrellus
Victoria	05/07/2019	23:22:43	04:50:00	21:19:00	02:03:43		Pipistrellus pipistrellus
Victoria	06/07/2019	02:33:17	04:51:00	21:18:00		02:17:43	Pipistrellus pipistrellus
Doneral	03/07/2019	23:16	04:48:00	21:20:00		01:56:00	Pipistrellus pipistrellus
Doneral	03/07/2019	23:16	04:48:00	21:20:00		01:56:00	Pipistrellus pipistrellus
Doneral	03/07/2019	23:16	04:48:00	21:20:00		01:56:00	Pipistrellus pipistrellus

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Project title Ebury Bridge Estate

Job number

257461-95

cc

File reference

Prepared by Rob Selwyn

Date

1 July 2020

Subject Ebury Bridge Estate, Loft Inspection Briefing Note

This File Note provides the results of internal inspections of Wellesley, Hillersdon, Dalton, Pimlico and Mercer Houses and provides recommendations to inform the bat soft strip methodology ahead of hard demolition. These works form part of the proposed development at Ebury Bridge Estate, which is located in central London at OS grid reference TQ 28567 78353 ('the site').

These works will be required under a European Protected Species (EPS) bat mitigation licence that is due to be determined by Natural England by 30th June 2020. With respect to Phase 1 and 1A demolition, previous surveys have indicated potential day roosts for low numbers of male or non-breeding female common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus* bats within Dalton, Hillersdon and Pimlico Houses. However, the other Houses were reported to have moderate bat potential and form part of the licence application due to the low risk of encountering roosting bats during the soft strip. This Note evaluates the potential for roosting bats at each House, detailing any signs of bats and potential roosting features (PRFs) that will need to be soft stripped.

2 Methodology

2.1 Roof void inspection

Internal inspections of the roof voids within Wellesley, Hillersdon, Dalton, Pimlico and Mercer Houses were completed on 17th and 18th June 2020 by a licensed bat worker (2015-18276-CLS-CLS) and an assistant following good practice guidance¹. The roof spaces were inspected to identify PRFs, including gaps beneath roof tiles and behind wooden beams, and record any signs of roosting bats. The survey focussed on the PRFs for common pipistrelle and soprano pipistrelle bats, which were recorded during the automated survey in 2019 and emergence and re-entry surveys in 2019 and 2020.

¹ Collins, J. (ed.) (2016), 'Bat Surveys for Professional Ecologists; Good Practice Guidelines (3rd Edn)'. The Bat Conservation Trust, London.

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Pipistrelles are crevices-roosting bats. In buildings, this includes under hanging tiles and lead flashing, between roof tiles and roofing felt, behind soffit, barge or eaves boarding and in cavity walls.

The inspections were carried out using a Clulite high powered torch, with care taken to minimise disturbance to any roosting bats through increased levels of noise, light or heat. Evidence of roosting bats searched for included bat specimens (live or dead), bat droppings, urine and fur-oil staining, feeding remains (moth wings) and scratch marks.

2.2 Limitations

The size of the roof voids and access routes from the top floor flats, as well as other site works, restricted access to a several areas:

- Wellesley House - the roof void was split by two internal walls, with two loft doors from the floor below into two spaces with potential for roosting bats. The southern area of the roof void was not accessed beyond the loft door approximately 2m in due to limited ventilation in the confined space restricted safe working far from the access point; however, the northern area could be fully inspected;
- Hillersdon House - the roof void was entirely open as the top floor ceiling has been stripped as part of asbestos removal works. A detailed inspection was undertaken of the beams and trusses where walls met the roof however, it was not possible to inspect higher PRFs below the ridge and around the chimneys;
- Dalton House - the majority of the roof void was entirely open as the top floor ceiling has been stripped as part of asbestos removal works. As with Hillersdon, a detailed inspection was undertaken of the beams and trusses where walls met the roof; however, it was not possible to inspect higher PRFs below the ridge and around the chimneys. In addition, there was no access to the roof void above the western end of the building as the top floor ceiling was intact with no loft hatch present (refer to Photograph 10);
- Mercer House - there was a single access point to an area at the eastern end of the roof void which was inspected. However, ongoing asbestos works in the western end of the building meant that the majority of the roof void could not be inspected; and
- Pimlico House - there was a single access point to an area at the eastern end of the roof void which was inspected. However, residents were occupying top floor flats at the western end of the building meaning that we could not inspect roof voids above. As well as this, limited ventilation in the confined space restricted safe working far from the access point.

These access limitations should be taken into account when considering the methods for the bat soft strip, in terms of the potential presence of additional PRF within internal areas that were not accessible.

3 Results

No bats or signs of bats were recorded the roof voids of any of the Houses. All the roof voids had a greater than 15° roof pitch with horizontal structural timbers, and were poorly insulated. There was

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no roofing felt or roofing boards behind the roof tiles on the majority of the Houses, which reduces opportunities for crevice-roosting bats including pipistrelle *Pipistrellus* sp.. The only exception to this was a section of boarding only at the bottom of the northern aspect of the roof of Dalton House, where there is potential for bats to roost between the roof tiles and boarding (Photographs 8 and 11). This is consistent with the results of the emergence/re-entry surveys which indicated a potential common pipistrelle day roost in Dalton House.

Dalton and Hillserdon House roof voids were open and well-lit as the majority of the ceilings had been stripped, which reduces their suitability for roosting bats (Photograph 7). It is possible that the removal of the top floor ceiling as part of the asbestos removal works within Dalton and Hillersdon Houses could have disturbed roosting bats, in terms of altering humidity, temperature and light levels. However, it is unlikely that PRF for common and soprano pipistrelle bats, as described in section 2.1, would have been impacted by these works. This includes features on the exterior of the building, such as areas of lifted lead flashing, as well as between the section of boarding and roof tiles on the northern aspect of Dalton House.

Wellesley House roof void has a large access point on the northern roof pitch, approx. 30cm, where roosting bats could potentially enter the roof void (refer to Photograph 3).

Within all Houses, there are a number of crevices along the central apex and around the chimneys, between beams and brickwork, which could not be closely inspected (Photographs 5, 8 and 9). There are PRFs for pipistrelles between the majority of roof tiles on all Houses where they have slipped and any adhesive used to originally affix them has worn away (refer to Photographs 4 and 12).

4 Recommendations

The results identified that the bat soft strip should focus on the roof tiles, particularly behind the roof boards on Dalton House, as well as PRFs around the chimneys and below the ridge beam of all Houses. It should be noted that these recommendations relate to internal PRFs that were recorded during the internal inspection. In addition, external PFRs, such as lifted lead flashing, would also need to be stripped and subject to the same supervision.

No demolition works may proceed until the bat licence has been granted by Natural England and the bat soft strip is completed as described in the method statement for the bat licence. A toolbox talk should be given to all operatives in advance of the bat soft strip to highlight the constraints and establish a safe method of working to avoid harm to roosting bats. The precise methods of working would be determined on site by the accredited agent.

Photographs



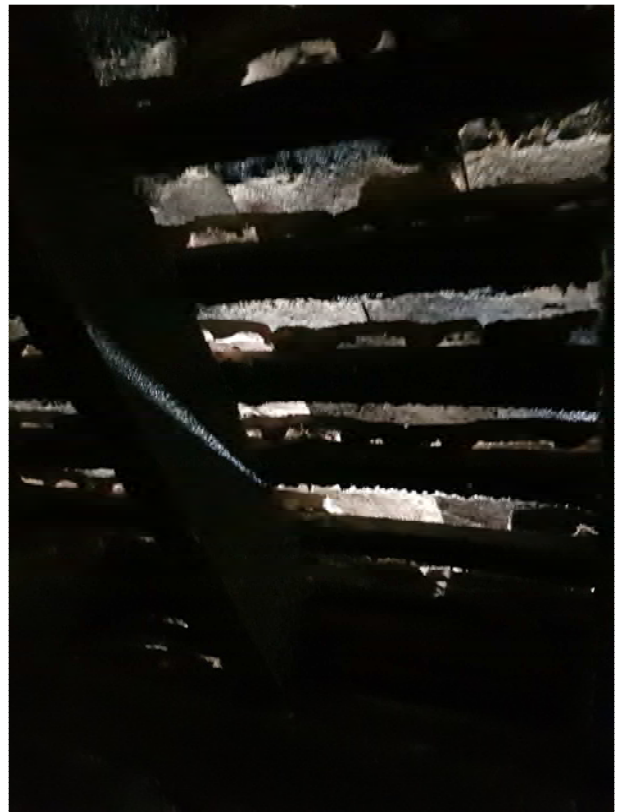
Photograph 1: Wellesley House roof void facing east along the northern apex.



Photograph 2: Wellesley House roof void facing east onto the eastern roof pitch.



Photograph 3: Wellesley House access point to the roof void where tiles are missing.



Photograph 4: Wellesley House PRFs between tiles where they have slipped and any adhesive used to originally affix them has worn away.



Photograph 5: Hillersdon House roof void facing south. A concrete chimney stack to the right of the picture couldn't be inspected where it meets the roof.



Photograph 6: Hillersdon House pitched roof



Photograph 7: Hillersdon House top floor ceiling. The roof void is subsequently open and well-lit.



Photograph 8: Dalton House roof void. Boarding at the base on the northern side of the roof. A concrete chimney stack to the right of the picture couldn't be inspected where it meets the roof.



Photograph 9: Dalton House roof void. A concrete chimney stack to the right of the picture couldn't be inspected where it meets the roof.



Photograph 10: Dalton House western end, no inspection was possible the other side of the internal white wall as the ceiling remained intact.



Photograph 11: Dalton House roof boards behind tiles on the northern aspect provide PRFs.



Photograph 12: Mercer House PRFs behind tiles where they have slipped and any adhesive used to originally affix them has worn away.



Photograph 13: Mercer House roof pitch and horizontal beam.



Photograph 14: Mercer House roof void facing west from the access point in the eastern end of the building.



Photograph 15: Pimlico House roof pitch.

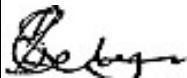




Photograph 16: Pimlico House roof void facing east from the access point in the eastern end of the building.



Photograph 27: Pimlico House roof void facing east from the access point in the eastern end of the building.

DOCUMENT CHECKING

	Prepared by	Checked by	Approved by
Name	Rob Selwyn	Gemma Turner	Neil Harwood
Signature			

F4 EPSM Bat Mitigation License Application



Charge form – mitigation licence – bats

This form will be used to assess whether your licence is:

- free
- a fixed price of £500
- a variable price – you can request a price indication

• All questions should be answered as appropriate. Questions or options within questions marked with * are mandatory. Failure to complete these may result in delays to your application. Your responses should match the information in your Application Form or your Method Statement.

• Natural England will aim to deliver a price indication within its published service standards.

Using and sharing your information

The Data Controller is Natural England. For further information on how we process your personal information please see the Wildlife Licensing privacy notice www.gov.uk/government/publications/natural-england-privacy-notices.

Section A. Applicant details

Forename			
Surname			
Company name			
Address			
Town/City			
County		Postcode	
Telephone number		Mobile	
Email address			

Section B. Is there a charge for my licence?

Is my application charged for?

Select any option that applies in Table 1a.

Table 1a. Charge exemptions		
My application is for:	Relevant options on the Application Form	Options selected
1. Householder home improvement project such as a loft conversion, an	Question 5(d) Project Category : Householder home improvement OR	<input type="checkbox"/>

extension, conservatory or garage. I have householder planning consent or no consent is required	Question 11(a)(5) Consent Status : No consent required. (Question 5(a) Project Description should describe a home improvement that does not require planning consent.)	
2. Health and safety	Question 5c Purpose: Preserving public health or public safety, under section 55(2)(e).	<input type="checkbox"/>
3. Preventing the spread of disease	Question 5c Purpose: Preventing the spread of disease, under section 55(2)(f).	<input type="checkbox"/>
4. Preventing serious damage	Question 5c Purpose: Preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber, fisheries or inland waters, or any other form of property under section 55(2)(g).	<input type="checkbox"/>
5. Historic building conservation The building or structure must be <u>one or more</u> of the following: a scheduled monument, a listed building or a registered place of worship OR a traditional farm building in a Stewardship agreement (Option HS1/HD1)	Question 11(f) Consent Obtained : Listed building consent OR Question 11(f) Consent Obtained Other: Scheduled monument consent OR Question 11(f) Consent Obtained Other: Faculty consent (for a place of worship (Question 6 Site Name should state the name of the place of worship) OR Question 5(a) Purpose Project Description should be clear that the traditional farm building is in Stewardship and quote the Agreement Number	<input type="checkbox"/>
† Applications made for both 'preserving public health or public safety' and 'imperative reasons of overriding public interest of a social or economic nature' under 55(2)(e) at Question 5 Purpose will be charged for, unless another charge exemption applies.		

If you have chosen one of the options in Table 1a your licence is free, you do not need to complete any more of this form. Submit this form with your application to eps.mitigation@naturalengland.org.uk .

The charge will also be exempted if it is an important roost and it will be retained unaltered in the structure. **Evidence is mandatory for criteria marked ***. Completing Table 1b will probably need the advice of an ecological consultant.

Select the option in Table 1b if it applies.

Table 1b. Charge exemption – conservation of a bat roost in situ

My application is for	Relevant options on the Application Form or Method Statement	All relevant options selected
<p>1. Conserving a bat roost in situ.</p> <p>The roost is a maternity, swarming or hibernation roost *</p> <p>OR</p> <p>The roost is a day roost containing 3 or more bats at one time.*</p> <p>AND</p> <p>The roost will be unaffected by the proposal*</p> <p>AND</p> <p>The roosting space(s), and pre-emergent flight areas remain accessible to bats and keep the same length, height and width*</p> <p>AND</p> <p>Access points will remain unaltered*</p> <p>AND</p> <p>For roof roosts, the roof timbers remain unaltered*</p> <p>AND</p> <p>No more than 5% of the building materials in the roost space is replaced.*</p> <p>AND</p> <p>The temperature and humidity of the roost remain unaltered.</p> <p>AND</p> <p>Light levels inside and outside the roost and flight paths to and from the roost will remain unaffected.*</p>	<p>Application Form Question 9 Expected roost type affected: maternity, swarming or hibernation</p> <p>OR</p> <p>Application Form Question 9 Expected roost type affected: day roost AND Maximum number of bats to be licensed</p> <p>AND</p> <p>Method Statement: Roost Modification D2.1 conclusion 'no change to roost post-development'</p> <p>AND</p> <p>Method Statement: Roost dimension modifications E3.2 'N/A'</p> <p>AND</p> <p>Method Statement: Dimension details of modified access points E3.2 'N/A'</p> <p>AND</p> <p>Method Statement: Other modifications to the roost E3.2 'N/A'</p> <p>AND</p> <p>Method Statement: Mitigation for any impacts of lighting E3.2 'N/A'</p>	<p><input type="checkbox"/></p>

If you have chosen the option in Table 1b your licence is free, you do not need to complete any more of this form. Submit this form with your application to eps.mitigation@naturalengland.org.uk .

If you have chosen 'A purpose not specified in Regulation 55(2) that is consistent with Article 16(1)(e) of the Habitats Directive, under Section 55(4).', you should contact Natural England at eps.mitigation@naturalengland.org.uk to discuss your choice and whether a charge may apply.

If you have not chosen any of the options in Table 1a or Table 1b, your licence will be charged for.

Section C. – Invoicing details

Only complete this section if your licence is charged for.

Please note:

- if the section below needs to be completed and is left blank, the form will be returned to you for completion. Licence assessment will not commence until these details are provided.
- requests for changes to invoice details made *after* an invoice has been issued (including missing purchase order numbers) will be subject to a £101 administration charge.

Invoicing details – details of where the invoice will be sent for payment			
Company name			
Address			
Town/City			
County		Postcode	
Telephone number		Mobile	
Email address for all invoices			
Customer contact name			
Email address (if different to invoicing address)			
Does your finance department require a purchase order number to be quoted on invoices? If YES, PO number <u>must</u> be provided below	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Purchase order number			

Section D. Licence cost

How much will my licence cost?

The charge for a licence is either fixed price at £500 or is variably priced, depending on the time taken to assess it. A variable price is calculated to the nearest quarter of an hour, based on an hourly rate of £101.

If your application is for one of the following species and one of the following roost types, your licence will be a fixed price of £500. Your selections must be supported by evidence in your Application Form. **Selecting criteria marked * is mandatory.**

Table 2. Fixed price selection		
My application is for:	Relevant options on the Application Form	Options selected
Is <u>not</u> a phased or multi-plot development.*	Question 5e Purpose	<input type="checkbox"/>
Will <u>not</u> impact on a Site of Special Scientific Interest, a Special Protection Area or a Special Area of Conservation.*	Question 7a Conservation Considerations	<input type="checkbox"/>
Your application is only for the following species		
Is for: common pipistrelle, soprano pipistrelle, whiskered, Brandt's, Natterer's, Daubenton's, brown long-eared or serotine† AND Is only for the following roost types: day roost or night roost or feeding perch or transitional/occasional. AND/OR lesser horseshoe bat‡ AND Is for a day roost or transitional/occasional roost	Question 9 Application details: Species AND Question 9. Roost type affected	<input type="checkbox"/>
† For applications affecting <u>serotine</u> in the following counties Kent, East Sussex, West Sussex, Surrey, Greater London, Hertfordshire, Essex, Buckinghamshire, Berkshire, Oxfordshire, Hampshire, Wiltshire, Somerset, Dorset and Devon.		
‡ For applications affecting <u>lesser horseshoe bat</u> in the following counties Cornwall, Devon, Somerset, Bristol, Wiltshire, Dorset, Gloucestershire and Herefordshire.		

If your application only includes the species and roost type combinations in Table 2, your application is fixed price and you should not complete any more of this form. Submit the form with your application to eps.mitigation@naturalengland.org.uk.

If your application:

- does not match any of the criteria in Table 2 or
- has species and roost combinations in addition to those in Table 2

your licence will be variable price.

Most variable price bat licences are likely to cost between £1113 and £2123, including the compliance check charge. A few licences will cost more than this.

Natural England will provide a price indication to the nearest day on request, see section E.

If you do not want a price indication for your variable price licence do not complete any more of this form. Submit the form with your application to eps.mitigation@naturalengland.org.uk .

Section E. Price Indication request

To be completed only if a price indication is required.

Site name	
Site address	

If Natural England has provided previous advice on this development site please quote our reference number, the date of correspondence and the Natural England contact name(s) below.

Reference number	
Date advice given	
Natural England staff member who provided the advice	

Which aspects of the application are likely to make the application more complex to assess?

Table 3. Select all the factors that apply to your application.	
Phased development	<input type="checkbox"/>
Multi-building/multi roost sites	<input type="checkbox"/>
The presence of the rarest species*	<input type="checkbox"/>
Regionally/nationally important roost sites/ populations	<input type="checkbox"/>
Surveys outside of current guidelines	<input type="checkbox"/>
Novel mitigation and compensation approaches	<input type="checkbox"/>
Request to use New Licensing Policies	<input type="checkbox"/>
Other reasons why you want a price indication	<input type="checkbox"/>
*Wray, S., Wells, D., Long, E., Mitchell-Jones, T., Valuing bats in ecological impact assessment, <i>In Practice</i> , December 2010 p23-25	

Please provide a brief outline of the above and state which section of the Method Statement contains further details.

--

An adviser may contact you to discuss the details of your Price Indication Request. If you prefer the adviser to speak to the ecological consultant please provide their name and telephone number.

Charge screening for A13

Consultant name	
Consultant telephone number	
Consultant email	

Please return this form to eps.mitigation@naturalengland.org.uk .



Bats – Method Statement template to support a licence application

The Method Statement will be used to determine the impact of the proposal on the favourable conservation status (FCS) of the species concerned (Regulation 55(9)(b)).

You are strongly advised to refer to the Bat Mitigation Guidelines.

Please use recent photographs to support your application.

Wildlife Licensing

Natural England
Horizon House
Deanery Road

Bristol
BS1 5AH.

T. 020802 61089

Important advice:

The format below must be used. Please enter text below each heading keeping information as concise as possible.

All maps/figures that will become part of any annexed licence granted must be submitted as separate documents (with the site name and date included on the map/figure. See section I for list – all others may be included within the Method Statement document (e.g. survey maps/figures) if preferred).

A separate work schedule must also be submitted on form WML-A13a-E5a&b to accompany the Method Statement.

A Executive summary

Provide an overview (no more than 1 side of A4) of what works are proposed and how the impacts identified will be addressed in order to ensure no detriment to the maintenance of the population at a favourable conservation status.

This Method Statement has been produced as part of an application for a licence to undertake demolition works as part of the redevelopment of the Ebury Bridge Estate in Pimlico, within the City of Westminster (central OS grid reference TQ285783) (hereafter referred to as 'the site'), see **Figure C5A - Location Map**. The Proposed Scheme involves the phased demolition and replacement of all 13 blocks (containing 336 residential units) with 9 new blocks (containing 737 residential units). The development would also provide retail space along Ebury Bridge Road, space for community use and external play space. The Proposed Scheme would remove 13 individual trees and one tree group, which would be compensated by extensive tree planting and urban greening. A hybrid planning application (detailed for Phase 1 and outline for Phase 2) is due to be submitted in June 2020.

This licence application relates to demolition Phases 1 and 1A, including six buildings (Wellesley, Wainwright, Hillersdon, Dalton, Mercer and Pimlico houses). Some scattered trees will also be felled to facilitate these demolition works. Demolition consent for Phases 1 and 1A has been approved by Westminster City Council subject to the commencement of development within five years. Phase 2 demolition (Bridge, Bucknill, Doneraile, Rye, Victoria and Westbourne houses) is programmed to start in 2023.

A Preliminary Ecological Appraisal (PEA), undertaken by Marishal Thompson Group in September 2013, identified that the majority of buildings on site have moderate potential to support roosting bats and the landscaped areas on site are of potential value to foraging bats (Annex H1).

A suite of bat surveys, which included preliminary ground-level roost assessments of the buildings, bat activity automated surveys and emergence/re-entry surveys, were undertaken by Ove Arup and Partners Limited (Arup) from June to September 2019 (Annex H1). The site is used as foraging and commuting habitat for common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus*. The majority of buildings were considered to have moderate bat roosting potential due to a number of potential roosting features (PRFs) at roof level. The only exception was Wainwright house, which was assessed to have low potential to support roosting bats and does not form part of the licensable works. The survey results suggest the potential presence of day roosts for low numbers of male or non-breeding female common and soprano pipistrelle bats within a number of the houses over the summer period. With respect to Phases 1 and 1A, Dalton and Hillersdon houses support potential common pipistrelle day roosts and Pimlico house supports a potential soprano pipistrelle day roost. These types of roost are of low conservation importance and are considered to be of local/parish value (Wray et al., 2010). Vegetation clearance would also reduce the value of foraging and commuting habitat for bats. With respect to Phase 2, Rye supports a potential common pipistrelle roost and Bridge and Westbourne support potential soprano pipistrelle roosts.

The mitigation strategy proposed therefore includes for the loss of day roosts, disturbance to bats and a risk of injury/killing during the works and includes:

- Emergence/re-entry surveys will be conducted on buildings being demolished during Phase 1 and Phase 1A with potential bat roosts or moderate bat roosting potential, specifically Dalton, Hillersdon, Wellesley, Mercer and Pimlico houses. This will be undertaken between May and early June 2020, before demolition which is scheduled between the end of June and October 2020. These would provide further clarity regarding the location and status (as day roosts rather than maternity) of any roosts and thus help target the soft stripping methodology. These emergence surveys will include Wainwright house to confirm that demolition works can proceed without a soft strip;
- Provision of alternative roost opportunities within the site prior to demolition. Four bat boxes, such as the Large Multi Chamber WoodStone Bat Boxes would be installed in June on trees retained throughout all phases of the Proposed Scheme and integrated within the proposed landscaping, in areas of the site that would be least disturbed by demolition and construction activities.
- Should specific roost locations be identified during the emergence survey that can be physically excluded, one-way excluders would be installed in the presence of an experienced bat ecologist (i.e. the Named Ecologist on the licence or their Accredited Agent) at the roosts prior to demolition.
- Prior to mechanical demolition, a soft strip would be undertaken on each building sequentially from June to October inclusive, when bats are active. This would focus on areas at roof level where any specific roosting locations and PRFs were recorded, in the presence of the Named Ecologist or their Accredited Agent.
- Bat boxes will be integrated into the facades of the proposed buildings to provide permanent roosting habitat for bats.

The implementation of the proposed mitigation strategy will prevent the loss of roosting habitat for bats, as well as direct harm and disturbance to bats during the demolition of the buildings. Furthermore, the integrated bat boxes will provide a long-term enhancement for roosting bats in conjunction with increased tree planting and landscaping. It is therefore considered that, with mitigation, the overall scale of impact will be beneficial.

B Introduction

B1 Background to activity/development:

Include a brief summary of:

- Why the activity and a licence are necessary (*e.g. bridge structure repairs are required and will affect a known maternity roost of Daubenton's bats, which will be temporarily lost whilst works are being undertaken; renovation works to an office building will result in the permanent loss of three day roosts of common pipistrelle bats; demolition of an existing hospital to be replaced with flats will result in the loss of a brown-long eared bat maternity roost*).

Phases 1 and 1A involves the demolition of Wellesley, Wainwright, Hillersdon, Dalton, Mercer and Pimlico houses. Dalton and Hillersdon houses have been identified to potentially support common pipistrelle day roosts, and Pimlico house to potentially support a soprano pipistrelle day roost. Wellesley and Mercer houses have moderate bat roosting potential. Vegetation clearance as a result of the Proposed Scheme would also reduce the value of foraging and commuting habitat for bats. The demolition has the potential to result in the loss of roosting sites, harm and disturbance to bats, and the displacement of these bats to other available sites (potentially buildings in the Ebury Bridge Estate retained until the Phase 2 demolition work), which would lead to an offence under wildlife legislation. The licence is primarily required for the destruction of these bat roosts under Phase 1 and 1A, but will also need to cover disturbance, and capture of any bats that might be present at the time of the works.

- Include current status of planning permission (if applicable) e.g. *full planning permission with all relevant wildlife conditions discharged; permitted development; demolition with prior notification of demolition issues resolved*. If the proposal is for demolition only of a structure supporting a bat roost/s, please confirm whether there are plans to develop the site in the future and if so when.

A prior notification has been obtained for Phase 1 and 1A demolition works as part of the Proposed Scheme (consent reference number 19/06951/APAD). A planning application for the Proposed Scheme is due to be submitted in June 2020 with timescales below:

- Phase 1 and 1A Soft strip and hard demolition May 2020 – January 2021
- Phase 1 Construction and fit out May 2021 - July 2023
- Phase 2 Soft strip and hard demolition July 2023 – March 2024
- Phase 2 Construction and fit out February 2023 – 2025
- Phase 3 Construction and fit out April 2024 - 2027

B2 Relationship with other nearby development and cumulative impacts

B2.1 Is the current application part of a larger development project? For example, is it part of a phased or multi-plot housing development that will require more than one bat licence? Enter Yes, No or N/A in the text box below. If yes, note a separate **master plan** document will be required.

Yes

Important Advice: If yes to the above, please note that sections in this Method Statement on impact assessment and mitigation measures must explicitly relate *only* to impacts from the works currently proposed.

A project-wide master plan must detail the overall impact assessment and mitigation and explain where, and why, each of the bat licences will be required. The master plan must be included as a separate document to this application: see http://www.naturalengland.org.uk/Images/WML-G11_tcm6-9930.pdf for details that are to be included in this separate document. The separate master plan is expected to take due regard of the overall project to ensure that in-combination effects are considered, and mitigation and compensation measures are both sufficient and coherent.

If the current development is part of a larger development project, summarise very briefly here how the current application relates to the larger project and how the in-combination effects are considered and mitigation/compensation is sufficient.

This licence application relates to demolition phases 1 and 1A of the Proposed Scheme, which involves the demolition of six buildings (Wellesley, Wainwright, Hillersdon, Dalton, Mercer and Pimlico houses) and the removal of some scattered trees. This forms the first stage of works for the Proposed Scheme, which comprises

the phased demolition and replacement of all 13 blocks (containing 336 residential units) with 9 new blocks (containing 737 residential units), alongside retail and community space and external play space. The Proposed Scheme would remove 13 individual trees and one tree group, which would be compensated by extensive tree planting and urban greening. Phase 2 demolition (Bridge, Bucknill, Doneraile, Rye, Victoria and Westbourne houses) is programmed from 2023.

The majority of buildings were considered to have moderate bat roosting potential due to a number of potential roosting features (PRFs) at roof level. The only exception was Wainwright house, which was assessed to have low potential to support roosting bats and does not form part of the licensable works. The survey results suggest the potential presence of day roosts for low numbers of male or non-breeding female common and soprano pipistrelle bats within a number of the houses over the summer period. With respect to Phases 1 and 1A, Dalton and Hillersdon houses support potential common pipistrelle day roosts and Pimlico house supports a potential soprano pipistrelle day roost. With respect to Phase 2, Rye house supports a potential common pipistrelle day roost and Westbourne and Bridge support potential soprano pipistrelle day roosts.

The mitigation strategy considers the combined effects of all the phases on the bat populations, as further described in the Bat Masterplan enclosed with this licence application. It includes mitigation measures for the loss of PRFs, disturbance to bats and a risk of injury/killing during the works.

Further surveys will be conducted on Bridge, Bucknill, Doneraile, Rye, Victoria and Westbourne houses in May to September 2022/2023 as demolition is currently programmed from October 2023, and a mitigation licence will be applied for accordingly. These surveys would provide updated and additional baseline survey data and obtain further clarity regarding the status of any roosts at that time, in order to inform the requirements for mitigation.

To provide opportunities for alternative bat roosts, bat boxes will be installed prior to the demolition of buildings with potential to support roosting bats in June 2020 on trees in areas of the site that will remain undisturbed throughout all phases of the development. Detailed external lighting design (street and security lighting) for the Proposed Scheme will be designed in consultation with an ecologist to avoid the impacts of lighting habitats across the site.

The implementation of the proposed mitigation strategy will prevent long-term loss of available roosting space for bats and direct harm and disturbance on the bat population. It is therefore believed that, with mitigation, the overall scale of impact will be negligible. Further enhancement opportunities will be incorporated throughout the Proposed Scheme, including provision of integrated bat boxes on the façades of the new buildings, and large-scale landscaping to provide enhanced foraging habitat and an improved network of commuting and dispersal pathways. The long-term impact will be beneficial, as it is anticipated that bats will use the provided roosting opportunities and benefit from the proposed habitat creation and enhancements.

Important Advice: to accompany this Method Statement also include Figure. B2.1 for a Master plan overview - and see section I "Map checklist" at the end of this document.

B2.2 Apart from any mention in B2.1, please inform us of any past or future development or other projects (in the last 5 years or next 5 years) in the vicinity which may have significantly impacted or are likely to significantly impact on the same population/s of bats as this application (e.g. loss of maternity or hibernation roosts). You must make reasonable efforts to establish this, including discussions with your client and the Local Planning Authority – stating below what you undertook. A brief summary of the project/s should be provided including the site name and location, dates and if known the licence reference number(s).

Please note we are not expecting details of every licence/planning permission issued within the vicinity of the site – we are only concerned with projects that have the potential to significantly impact or have impacted on same population of bats (maternity and hibernation roosts). Note: Natural England is aiming to make available licensing records from the last 5 years publically available.

A review of the MAGIC website for granted European Protected Species Applications on 25th April 2020 (<https://magic.defra.gov.uk/MagicMap.aspx>) revealed no granted bat licence applications within a 2km radius of the site. Two granted planning applications just outside this buffer were identified for common and soprano pipistrelles, however these both related to destruction of a resting site and thus no impacts to breeding or

hibernation sites; case references 2015-7747-EPS-MIT, dated 2015-2020 and 2016-27191-EPS-MIT, dated 2017.

Cumulative schemes were identified to inform the cumulative impact assessment for the Environmental Impact Assessment for the planning application for the proposed scheme. In February 2020, past developments were identified using the London Development Database (<https://www.london.gov.uk/what-we-do/planning/london-plan/london-development-database#>) to capture developments to the end of November 2019 (data is up-to-date to before three months of access). To capture developments submitted thereafter through to the end of February 2020, planning applications portals of relevant planning authorities were accessed. Accounting for the size and location of the Proposed Scheme and the nature and density of the surrounding area, an area covering a 1km radius from the site was selected. Only major developments were selected as there is a greater potential for significant environmental effects. Nationally Significant Infrastructure Projects have also been included. This search identified four developments.

The redevelopment of Battersea Power Station, located approximately 570m to the southwest of the site, has the potential to have a permanent adverse effect on bats as roosts were recorded on site. However, no hibernation or maternity roosts have been recorded. The ecology chapter for the planning application submitted in 2009 (2009/3575) states that 'The Power Station supports only small numbers of common pipistrelles, which make regular use of the building for shelter. These are most likely to be male and/or non-breeding female bats' (URS Corporation Limited, 2009). Similarly, with respect to the planning application submitted in 2013 (2013/6639), bat surveys in 2013 revealed 'only one common pipistrelle roost of low numbers remaining in Turbine Hall A, most likely comprising males and / or non-breeding females' (Waterman, 2013). A Natural England development licence was submitted to Natural England in 2013 and a Bat Management Strategy has been drawn up in consultation with Natural England to mitigate impacts. The other three developments are Chelsea Barracks, Cringle Dock Waste Transfer Station and Thames Tideway Tunnel. No impacts to roosting bats were recorded with respect to these developments.

Planning departments for boroughs within 2km of the site (City of Westminster, Wandsworth, Royal Borough of Kensington and Chelsea and Lambeth) were contacted on 25th April concerning developments impacting common and soprano pipistrelle maternity and hibernation roosts. None such roosts were identified.

Important Advice: locations of other bat mitigation sites that may have significantly impacted or are likely to significantly impact on the same population/s of bats as this application must be shown on Figure B2.2.

C Survey and site assessment (also see section 5 of the Bat Mitigation Guidelines)

C1 Pre-existing information on the bat species at the survey site:

Please undertake a historical data search within a 2km search radius and provide a summary of the results of this search. For example, records from local environmental records centres, local bat groups and previous survey work undertaken at the site is all relevant. Please briefly comment on the results in relation to your project/site

- Should no historical records be found from your search please state this – and specify what searches you undertook.
- Note that you must not include records from National Biodiversity Network (NBN) without first obtaining written permission from the relevant Data Provider.

Pre-existing records of bats from within 1km of the Proposed Scheme were obtained from Greenspace Information for Greater London (GIGL) on 23rd October 2019 (Annex H2). Bat occurrence and roost records from within 2km of the Proposed Scheme were also obtained from the London Bat Group in March 2020 (Annex H2). Bat records from the last ten years were analysed, as older records are less likely to accurately represent the

species currently present on site.

GIGL returned records of the following bat species records within 1km of the Proposed Scheme:

- Common pipistrelle - *Pipistrellus pipistrellus* (21 field records)
- Soprano pipistrelle – *Pipistrellus pygmaeus* (six field records)
- Nathusius' pipistrelle - *Pipistrellus nathusii* (one field record)
- Common noctule – *Nyctalus noctula* (four field records)
- Serotine - *Eptesicus serotinus* (two field records)

London Bat Group's records also support the above bat species provided by GIGL, with an addition of records for Leisler's bat *Nyctalus leisleri* and Daubenton's bat *Myotis daubentonii*. London Bat Group returned the following species records within 2km of the Proposed Scheme:

- Common pipistrelle - *Pipistrellus pipistrellus* (81 field records, one known roost 1.0 km east to the site)
- Soprano pipistrelle – *Pipistrellus pygmaeus* (27 field records)
- Nathusius' pipistrelle - *Pipistrellus nathusii* (15 field records)
- Common noctule – *Nyctalus noctula* (15 field records)
- Leisler's bat *Nyctalus leisleri* (Two field records)
- Serotine - *Eptesicus serotinus* (Five field records)
- Daubenton's bat *Myotis daubentonii* (One field record)

C2 Status of the bat species: Detail conservation status at the local, county and regional levels. Please complete the following table, justifying your assessment, and add additional lines where necessary. If the status is unknown then please enter 'unknown'.

Species	Conservation status assessment		
	Local	County	Regional
Common pipistrelle <i>Pipistrellus pipistrellus</i>	From the bat roost records identified and large number field records of the species in section C1 above, and the presence of foraging habitat (trees and grassland) nearby, it is considered that these bats are widespread locally.	Common across Greater London. Taken from: https://londonbats.org.uk/bat-cave/bats-of-london/	According to the BCT 2017 National Bat Monitoring Programme (JNCC and BCT 2018), the UK population of common pipistrelle was showing an increase. Their historic decline means that they were listed as priority species in the UK Biodiversity Action Plan (BAP); however, it has since been removed from the UK BAP priority list as a result of its population remaining stable.
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	From the large number of field records of the species in section C1 above, and the	Common across Greater London, especially around	A review by the BCT and JNCC in 2017 (JNCC and BCT 2017)

	presence of foraging habitat (trees, and grassland) nearby, it is considered that these bats are widespread locally.	water bodies. Taken from: https://londonbats.org.uk/bat-cave/bats-of-london/	concluded that there had been no significant trends in the population of this species and it is currently considered to be stable.
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****Please note** that you can add more rows to the table: right click in any cell choose Insert > Insert rows below.

C3 Objectives of the survey to inform this proposal: Please complete the following table, entering 'Yes', 'No' or N/A' to indicate the objective of your survey and provide comments/explanation where necessary:

Survey objective	Yes / No / N-A	Comments
Determine presence / absence of bats	Yes	Establish the presence or likely absence of bat roosts within the buildings to be lost.
Determine bat usage of site (e.g. maternity, hibernation, night roosts in various structures (specify)).	Yes	Determine roost status, usage and bat access points within the buildings to be lost.
Identify foraging, commuting or swarming sites (explain)	Yes	Connected to, or of importance to any roosts present at or immediately adjacent to the site in particular.
Other (explain)	Yes	Confirm species identification. Assess the potential impacts of the proposed works on bats and inform a mitigation and compensation strategy that is proportional and appropriate to these impacts.

C4 Site/habitat description: Please provide:

- Brief descriptions of the site, including total size of the development site (ha) (most often within the red line planning boundary) and areas of the site with potential value to bats (ha).

The site is approximately 1.85 hectares (ha) in area and comprises of a series of multi storey flats forming a residential estate with associated amenity areas. Most of the flats are 5 storeys high with tiled roofs, with various extensions over time to add features such as lifts and new entrances (approximately 0.59 ha). There is also a park with amenity grassland, ornamental trees and shrubs (approximately 0.15 ha). Around the bases of the flats are individual amenity areas, which are separated from the main area by steel fences. These areas have small areas of lawn with raised beds along with small storage sheds. The total area of amenity grassland is approximately 0.28 ha and introduced shrub amounts to approximately 0.13 ha

- Brief descriptions of the structures on site, differentiating between **those surveyed** and **not surveyed**, with an explanation why. Ensure structures are referenced and consistently indicated on relevant figures and tables.

All structures and trees on site were surveyed. This involved an external inspection of buildings and trees from the ground to look for features that bats could use for entry/exit and roosting, and to search for any field signs of bats. The search covered potential roosting features (PRFs) and areas where bat droppings may collect.

No internal inspections of rood voids were possible due to health and safety restrictions that prevented safe access (the buildings had not yet been surveyed for asbestos). No further surveys were undertaken on the scattered trees as they all lacked potential PRFs and were assessed to have negligible potential to support roosting bats.

All the flats were subsequently subject to automated and bat emergence and re-entry surveys as they were assessed to have low (Wainwright) to moderate (all other houses) potential to support bat roosts.

See **Figure C5b – Survey Area** which shows the scheme boundary (red line boundary). Also see **Figure C6 Survey results for the automated and emergence and re-entry surveys** for the locations of the buildings surveyed.

- A description of adjacent areas/offsite habitats, specifying any relevance to bats, including descriptions of habitat/s relevant to bat commuting/foraging behaviour.

The site is located in Pimlico, within the City of Westminster, within a highly urbanised environment. The site is bounded by Ebury Bridge to the north, major railway lines to the east leading to Victoria Station, access roads to the south, and Ebury Bridge Road to the west. A major redevelopment at Chelsea Barracks is located to the south west. Directly to the south, north west and north of the site are further residential and retail units. The River Thames runs west to east approximately 300m south of the site. Chelsea embankment and gardens located to the south of the site. In conjunction with limited vegetation present on site, these areas offer some foraging opportunities for bats.

- Please also include annotated (cross reference the structures) and dated photographs (showing both internal and external survey areas) as these are very useful as an assessment aid. These can be inserted below or submitted as a separate (referenced) document.

The following photographs were taken during the walkover survey on 23rd April 2020. No internal access to roof spaces was possible due to the potential presence of asbestos.

Phase 1 and 1A Demolition

Hilliersdon house. Both from the park to the west.



Dalton house. First two taken from the north and last two from the south.



Wellesley and Wainwright house. First photo from Ebury Bridge Road to the west, second photo from the northeast.



Mercer house. Both taken from the south.



Pimlico house. First two taken from the south. Third photo from the north. Fourth photo from the southwest.



Phase 2 Demolition

Doneraile house. First photo from the north, second from the northwest.



Westbourne house. Both photos from the east.



Rye house. From the Ebury Bridge Road to the west.



Bucknill house. From the Ebury Bridge Road to the west.



Victoria house. Both photos from the east.



Bridge. All photos from the south.



C5 Field survey(s):

Surveys must be up to date and have been conducted within the current or most recent optimal season.

Surveys must be undertaken in accordance with the most up to date edition of the Bat Conservation Trust (BCT) *Bat Surveys for Professional Ecologists – Good Practice Guidelines* and the *Bat Mitigation Guidelines*.

C5a Justification for surveys that deviate from the best practice guidelines: Please provide full justification below if your surveys deviate from the aforementioned best practice guidelines, confirming how you have obtained a full appreciation of the bat species roosting at the site, and of the type and status of roosts they use on site and in the context of the immediate surrounding area. **Please note that inadequate survey information is likely to cause delays to your licence application and may result in a Further Information Request.**

N/A

C5b Please complete the following tables and add additional lines where necessary (*right click in any cell outside the grey box area. Choose Insert > Insert rows below*). Please enter 'N/A' if the table is not applicable to your survey. Please ensure the information is consistent with Figure **C5b** (showing all buildings, structures and habitats that are within the survey area and distinguishing those that were surveyed and those that were not; indicate where surveyors were located):

Visual inspection

Date of each survey visit (e.g. format 01/06/13)	Structure reference / location	Equipment used (e.g binoculars, endoscope)	Weather – (Include temps, precipitation, Beaufort wind scale etc)
4th June 2019	Site-wide	Binoculars	Cool with slight drizzle
Comments (to include # of surveyors used for each visit): 2 surveyors for the bat scoping visit. The site was evaluated for its suitability to support foraging, commuting and roosting bats, in accordance with current guidance (Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists; Good Practice Guidelines (3rd Edn). The Bat Conservation Trust, London.).			
28th June 2019	Site-wide	Binoculars	Warm and clear
Comments: 2 surveyors for the preliminary bat roost assessment of the site. This involved an external inspection of buildings and trees from the ground to look for features that bats could use for entry/exit and roosting, and to search for any field signs of bats. The search covered potential roosting features (PRFs) and areas where bat droppings may collect. No internal inspections of rood voids were possible due to health and safety restrictions that prevented safe access as the buildings had not been surveyed for asbestos.			

Please provide surveyors names (*including Class Licence registration number if applicable*) and ensure the above table states the number of surveyors used for each survey visit undertaken.

Austin Brown and Rob Selwyn on 04/06/2019. Rob Selwyn and Gemma Tuner on 28/06/2019. Gemma Turner – Lead ecologist, Natural England Level 2 Class Licence (CL18) Registration Number 2015-15889-CLS-CLS, with over 12 years' experience of undertaking bat surveys. Austin Brown – experienced Ecologist (not licenced). Rob Selwyn – experienced Ecologist (not licenced).

Dusk survey

Date of each survey visit (e.g. format 01/06/13)	Start and end times and time of sunset	Structure reference / location	Equipment used (include make of bat detectors and logging equipment)	Weather – (Include start and end temps, precipitation, Beaufort wind scale etc)
6th August 2019	Start time: 20:26 End time: 22:11 Sunset time: 20:41	Site-wide	Batlogger M, Anabat Walkabout, Batbox	17°C, some cloud, dry, light breeze

			Duet, Batlogger A+	
Comments (to include # of surveyors used for each visit): Bat emergence surveys were conducted by six Arup surveyors in accordance with current guidance (Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists; Good Practice Guidelines (3rd Edn). The Bat Conservation Trust, London.). The surveys were led by a licensed bat worker (Gemma Turner). The dusk emergence surveys started at least fifteen minutes before sunset and finished ninety minutes after sunset. Three of the six surveyors were positioned at roof level in flats and on balconies overlooking adjacent buildings, with the other three at ground level. Both the number and positioning of surveyors were informed by the bat activity recorded during the automated bat survey. Surveyors were positioned at viewpoints where they had good sight of all aspects of the buildings from which to detect any bat emergence from or re-entry to the buildings. Notes were made of any bats seen or heard, including species, activity (e.g. foraging, commuting etc.) and on the direction of movement. Bat calls were recorded for later analysis using the BatExplorer software, using published references such as Jon Russ (2012).				
29th August 2019	Start time: 19:39 End time: 21:24 Sunset time: 19:54	Site-wide	Batlogger M, Anabat Walkabout bat detectors, Batbox Duets, Batlogger A+s	18°C, clear, dry and still with occasional gusts
Comments: The methodology for the dusk survey followed the same approach as that described for the dusk survey carried out on the 06/08/2019. The same number of surveyors was used.				

Please provide surveyors names (*including Class Licence registration number if applicable*) and ensure the above table states the number of surveyors used for each survey visit undertaken.

6th August 2019 - Gemma Turner, Austin Brown, Freya Johnson, Hanna Grimsdale, Lizzie Gardner and Rob Selwyn
29th August 2019 - Gemma Turner, Austin Brown, Tom Gray, Hanna Grimsdale, Livvy Cropper and Rob Selwyn
Gemma Turner – Lead ecologist, Natural England Level 2 Class Licence (CL18) Registration Number 2015-15889-CLS-CLS, with over 12 years' experience of undertaking bat surveys. Austin Brown – experienced Ecologist (not licenced). Tom Gray –Natural England Level 2 Class Licence (CL18) Registration Number Registration Number 2015-18276-CLS-CLS Lizzie Gardner– experienced Ecologist (not licenced). Livvy Cropper - experienced Ecologist (not licenced). Rob Selwyn – experienced Ecologist (not licenced). Hanna Grimsdale – experienced Ecologist (not licenced). Freya Johnson – graduate Ecologist (not licenced).

Dawn survey

Date of each survey visit (e.g. format 01/06/13).	Start and end time and time of sunrise	Structure reference / location	Equipment used (include make of bat detectors and logging equipment)	Weather – (Include start and end temps, precipitation, Beaufort wind scale etc)
13th September 2019	Start time: 05:02 End time: 06:32	Site-wide	Batlogger M, Anabat Walkabout bat detectors, Batbox	14°C some cloud, dry, light breeze

	Sunrise time: 06:32		Duets, Batlogger A+s	
Comments (to include # of surveyors used for each visit): This survey was undertaken following the same methodology as described above for the dusk survey on the 06/08/2019. The dawn survey started ninety minutes before sunrise and finished at sunrise.				

Please provide surveyors names (*including Class Licence registration number if applicable*) and ensure the above table states the number of surveyors used for each survey visit undertaken.

Gemma Turner – Lead ecologist, Natural England Level 2 Class Licence (CL18) Registration Number 2015-15889-CLS-CLS, with over 12 years' experience of undertaking bat surveys. Lizzie Gardner– experienced Ecologist (not licenced). Rob Selwyn – experienced Ecologist (not licenced). Hanna Grimsdale – experienced Ecologist (not licenced). Freya Johnson – graduated Ecologist (not licenced). Felicity Cole – experienced environmental consultant (not licenced).

‘Other’ survey (please specify e.g. trapping, remote, etc)

Date of each survey visit (e.g. format 01/06/13).	Start and end times	Structure reference / location	Equipment used (include make of bat detectors and logging equipment)	Weather – (Include start and end temps, precipitation, Beaufort wind scale etc)
28th June 2019 to 8th July 2019	Whole day	Bridge house – southern façade; Pimlico house – southern façade; Dalton house – southern façade; Hillersdon house – western façade; Rye house – western façade; Donerel house – western façade; Bucknill house – western façade; Victoria house – southern façade; Mercer house – southern façade	Static detectors (Batlogger A+)	The temperature range for the duration of the automated survey was 10°C to 34°C.

Comments (to include # of surveyors used for each visit): An automated bat survey was undertaken between 28th June and 8th July 2019 to assess levels of bat activity associated with PRFs identified during the preliminary bat roost assessment and to inform requirements for further bat survey effort. Nine static detectors (Batlogger A+) were deployed across the site for 10 nights. Detectors were positioned at roof level to target PRFs beneath lifted and missing tiles, gaps in lead flashing and hanging tiles on the sides of the

dormers. BatExplorer sound analysis software was used to analyse the calls recorded.

Please provide surveyors names (including Class Licence registration number if applicable) and ensure the above table states the number of surveyors used for each survey visit undertaken.

Gemma Turner – Lead ecologist, Natural England Level 2 Class Licence (CL18) Registration Number 2015-15889-CLS-CLS, with over 12 years' experience of undertaking bat surveys.

Rob Selwyn – experienced Ecologist (not licenced).

Please explain any constraints on the survey/s undertaken (time of year, cold weather, refused access, safety issues preventing access etc – justify as necessary and include evidence where required). If access was refused please provide evidence (letter/email) to demonstrate this.

Following the current guidelines, emergence/re-entry surveys should be spread out as far as possible between May and September. Due to time restrictions, the surveys were undertaken in August and September. Due to the inherent challenge of surveying multiple tall buildings within an urban location, automated detectors were selected as an initial screening method to establish whether the timings of bat activity at the site indicated the presence of potential roosts. Following the collation and analysis of this data and commission for the next stage of recommended works, this was the only survey window available. In addition, there was limited view of PRFs at roof level by Surveyors 1 and 2 at ground level, which were also obstructed by lighting. The sub-optimal timings of the emergence/re-entry surveys, as well as the suboptimal viewpoint of PRFs for surveyors at ground level, have been considered when considering mitigation (see section E3).

The majority of PRFs within the site are relatively small (beneath lifted and missing tiles, gaps in lead work and hanging tiles on the side of the dormers) and at roof level of the existing five story residential buildings. Therefore, from ground level, there is limited visibility of these PRFs. However, where necessary, access was arranged for surveyors during the emergence/re-entry surveys to be positioned in top floor flats and balconies so that the PRFs were then clearly visible and thus activity could be recorded at roof level.

During the automated survey, the Batlogger A+ placed on Mercer house did not record any data due to a technical malfunction. This is a limitation to the survey, as it is not possible to draw any conclusions regarding bat activity near to the building. However, this was taken into account in the subsequent surveys as the emergence/re-entry surveys covered this building on the assumption that it offers high bat potential and similarly this building has been assumed to support roosting bats in development of the mitigation, akin to the other buildings at the site.

During the bat dusk emergence survey on the 6th August, a malfunction with surveyor 2's Batlogger A+ recording device meant that the recordings could not be analysed; however, Surveyor 1 was stood nearby and recorded similar activity to that noted by surveyor 2. Therefore, this was not considered a significant limitation.

Also complete the following:

- If DNA analysis of droppings has been undertaken, please indicate below (Yes, No, N/A) and ensure that **Figure C5b** (if applicable – see below) details the locations where the samples were taken. Where long-eared bats are detected but cannot be identified to species level visually, DNA analysis of any droppings will be needed where grey long-eared bats may be present.

No

- Please confirm that a walk over survey/check has been carried out within 3 months *prior* to application submission by a suitably experienced ecologist to ensure that conditions have not changed since the most recent survey was undertaken. Provide details of any changes to conditions and habitats and/or structures on site since the surveys were undertaken.

Date of walkover survey/check	23/04/2020
Details of any changes to conditions and habitats and/or structures, if there are no changes please insert 'None'	No change.

C6 Survey results: Summarise your findings in the tables below and cross reference to **Figure C6** (which must also include flight lines, access points, dimensions of existing roosts etc). If you did not undertake a specific survey type please add N/A to the relevant table/s. Raw data is to be appended to the Method Statement (including sonograms, DNA analysis results etc).

Roost types to be referenced as: Day, Night, Feeding Perch, Transitional, Satellite, Maternity, Hibernation confirmed, Foraging Area, Commuting Route, Swarming Site, Other. See end of document for "Definitions" of these roosts.

When completing "Notes/observations" include reference to direct observations, extent and age of droppings, presence of field signs, emergence or re-entry, echolocation analysis. Also include DNA results if applicable and include nil results)

Visual inspection results

Date (e.g. format 01/06/13)	Species and numbers	Roost type (to be consistent with the above listed types)	Structure reference (consistent with relevant figures and other text)	Roost location	Access points (include # of them)	Dimensions of existing roosts or explanation of where the roost is (as appropriate)
4th June 2019	N/A	N/A	Site-wide	N/A	N/A	N/A
Notes/observations: <p>The site is of low potential for a small number of foraging and commuting bats due to the limited extent of the park and ground level trees. There is limited connectivity to suitable habitat; however, the site's location adjacent to National Rail land provides navigational features towards the River Thames that could be used by bats.</p> <p>Most of the buildings were assessed to be of moderate potential to support roosting bats due to features at roof level, such as lifted and missing roof tiles, gaps in lead work and hanging tiles on the side of dormers. One building, Wainwright house, was assessed to be of low potential to support roosting bats.</p> <p>All trees lacked potential PRFs and were assessed to have negligible potential to support roosting bats.</p>						
28th June 2019	N/A	N/A	Site-wide	N/A	N/A	N/A
Notes/observations: <p>No signs of roosting bats were observed during the preliminary bat roost assessment.</p> <p>In general, gaps in lead flashing were recorded on all buildings except Wainwright, around the chimneys, along the guttering between roof pitches and where dormers were inbuilt into the tiled roofs. However, gaps in lead flashing around dormers were more prominent on Dalton, Mercer, Pimlico and Bridge houses on the southern façades.</p> <p>In general, low numbers of lifted and missing roof tiles were recorded on all buildings across the estate except Wainwright, and many slipped and missing hanging tiles were recorded on all dormers on Dalton's, Mercer's, Pimlico's and Bridge's southern façades. Additional lifted and missing tiles and gaps in lead flashing were recorded</p>						

around extraction fans on the roofs on Doneraile and Hillersdon houses.

Provide further (brief) comments/explanation if required:

N/A

Dusk survey results

Date (e.g. format 01/06/13)	Start and end times	Species and numbers	Roost type (to be consistent with the above listed types)	Structure reference (consistent with relevant figures and other text)	Roost location	Access points (include # of them)	Dimensions of existing roosts or explanation of where the roost is (as appropriate)
6th August 2019	Start time: 20:26 End time: 22:11	N/A	N/A	N/A	N/A	N/A	N/A

Notes/observations:

No bats were observed emerging from any of the buildings.

Regular commuting and foraging activity was recorded nearby the park and ground level trees by Surveyors 1 and 2. Surveyor 2 heard the first bat, a common pipistrelle commuting at 21:06 (24 minutes after sunset), Surveyor 1 then also heard a common pipistrelle bat at 21:08. From this time, surveyors 1 and 2 recorded common pipistrelle foraging amongst the trees around the park approximately every 5 to 10 minutes until the end of the survey.

Surveyors 3, 4, 5 and 6 recorded no bats.

29th August 2019	Start time: 19:39 End time: 21:24	N/A	N/A	N/A	N/A	N/A	N/A
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Notes/observations:

No bats were observed emerging from any of the buildings.

Surveyor 2 heard the first common pipistrelle commuting at 20:12 (18 minutes after sunset) and Surveyor 1 heard a common pipistrelle commuting at 20:28 (34 minutes after sunset). No bats were seen.

Surveyors 4 and 5 heard common pipistrelle at 20:26 and 20:27 respectively. It was a single pass for both surveyors. Surveyors 3 and 6 recorded no bats.

Provide further (brief) comments/explanation if required:

N/A

Dawn Survey results

Date (e.g. format 01/06/13)	Start and end times	Species and numbers	Roost type (to be consistent)	Structure reference (consistent)	Roost location	Access points (include)	Dimensions of existing roosts or
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			<i>with the above listed types)</i>	<i>with relevant figures and other text)</i>		# of them)	explanation of where the roost is (as appropriate)
13th September 2019	Start time: 05:02 End time: 06:32	Unknown – no echolocation was recorded (1)	Potential day roost	Dalton house (southern façade)	Roof	Slipped roof tiles (precise return location not confirmed, however two recorded in suspected re-entry location.. Refer to Figure C6)	Potentially under lifted roof tile, roofing felt or other locations within roof void

Notes/observations:

Common pipistrelle was occasionally heard by Surveyors 1 and 2 nearby the park between 04:55 and 06:15 (17 minutes before sunrise). Surveyor 2 recorded a potential re-entry to the southern façade of Dalton house at 5:47, 45 minutes before sunrise. A potential bat was recorded flying to the roof at the eastern end (refer to the photograph on Figure C6). No echolocation was recorded. This surveyor also recorded a common pipistrelle commute east close to the building at 6:15, 17 minutes before sunrise, which was not seen to return to the building.

Surveyor 3 heard one common pipistrelle bat at 05:17. It was a single pass.

Surveyors 4, 5 and 6 recorded no bats.

Provide further (brief) comments/explanation if required:

A specific access point associated with the potential re-entry at 5:47 was not recorded, although there are two slipped tiles in this part of the roof. However, given that the surveyor was located at ground level, it is considered possible that it could have flown over the roof and either off site or to another building on site, although no other surveyors recorded any bat activity at this time.

‘Other’ results – please specify.

Date (e.g. format 01/06/13)	Species and numbers	Roost type (to be consistent with the above listed types)	Structure reference (consistent with relevant figures and other text)	Roost location	Access points (include # of them)	Dimensions of existing roosts or explanation of where the roost is (as appropriate)
29 th June 2019	Soprano pipistrelle	Potential day roost	Bridge house	Unknown	Unknown	Unknown
29 th June 2019	Soprano pipistrelle	Potential day roost	Pimlico house	Unknown	Unknown	Unknown

29 th June 2019	Soprano pipistrelle	Potential day roost	Westbourne house	Unknown	Unknown	Unknown
28 th June to 8 th July 2019	Common pipistrelle	Potential day roost	Dalton house	Unknown	Unknown	Unknown
29 th June and 6 th to 7 th July 2019	Common pipistrelle	Potential day roost	Hillersdon house	Unknown	Unknown	Unknown
30 th June and 7 th July 2019	Common pipistrelle	Potential day roost	Rye house	Unknown	Unknown	Unknown

Notes/observations:

The key results of the automated survey are summarised the following table.

Please note the results for Bridge, Westbourne, Rye, Doneraile, Bucknill and Victoria have only been included for completeness, but do not relate to this bat licence application as they will be demolished as part of Phase 2 which will be the subject of a separate licence application as applicable, as explained in the Bat Masterplan.

House	Summary of recordings
Bridge - southern façade	Recorded soprano pipistrelle <i>Pipistrellus pygmaeus</i> activity close to sunset and sunrise on 29 th June, including from 32 minutes before sunrise and 18 minutes after sunset. Potential chattering in a roost was recorded prior to the echolocation calls approximately 18 minutes after sunset.
Pimlico - southern façade	Recorded common pipistrelle <i>Pipistrellus pipistrellus</i> approximately 34 minutes after sunset on 7 th July.
Mercer – southern façade	The automated detector malfunctioned; therefore, it is not possible to confirm whether there was bat activity at this location.
Dalton - southern façade	Recorded most bat activity, with 102 calls recorded over the 11 nights, including a common pipistrelle call 21 minutes after sunset on 6 th July.
Hillersdon -western façade	Recorded common pipistrelle calls within 35 minutes of sunrise on three nights, including approximately 21 minutes before sunrise on 6 th July.
Rye – western façade	Recorded bat activity closest to sunrise and sunset, including a common pipistrelle call 16 minutes after sunset on 30 th June.
Doneraile - western façade overlooking courtyard	No bat calls recorded within 35 minutes of sunset or sunrise.
Bucknill - western façade	No bat calls recorded within 35 minutes of sunset or sunrise.
Victoria - southern façade overlooking Wainwright and Wellesley	No bat calls recorded within 35 minutes of sunset or sunrise.

*

Provide further (brief) comments/explanation if required:

Westbourne, Pimlico, Bridge, Hillersdon and Rye houses have been identified as potential pipistrelle day roosts due to the bat activity recorded during the automated survey. Westbourne and Pimlico houses have been identified as potential soprano pipistrelle day roosts due the bat activity recorded by the automated detector located on the southern façade of Bridge house. This is on account of the proximity of these houses to Bridge house.

C7 Interpretation/evaluation of survey results (also see the Bat Mitigation Guidelines section 5.8 and Figure 4 for conservation significance of roost type): Please complete the following table:

Structure reference (ensure consistency with other text and Figures)	Species	Count / estimate of number of individuals	Roost location	Site status assessment (e.g. maternity, feeding roost, swarming site, hibernation confirmed etc)	Conservation significance of roost
Bridge house	Soprano pipistrelle	1	Roof, likely associated with slipped and missing tiles	Day roost	Low
Pimlico house	Soprano pipistrelle	1	Roof, likely associated with slipped and missing tiles	Day roost	Low
Westbourne house	Soprano pipistrelle	1	Roof, likely associated with slipped and missing tiles	Day roost	Low
Dalton house	Common pipistrelle,	1	Roof, likely associated with slipped and missing tiles	Day roost	Low
Hillersdon house	Common pipistrelle,	1	Roof, likely associated with slipped and missing tiles	Day roost	Low
Rye house	Common pipistrelle,	1	Roof, likely associated with slipped and missing tiles	Day roost	Low

Provide further (brief) comments / explanation if required:

Small numbers of common and soprano pipistrelle bats were recorded during automated surveys and emergence and re-entry surveys. Both common and soprano pipistrelle bats are known to be widely present across London. The species assemblage recorded during the surveys is typical of this type of densely populated urban habitat.

The results of the automated survey in June and July 2019 indicate a potential soprano pipistrelle day roost within Bridge, Pimlico or Westbourne houses and also common pipistrelle day roosts within Dalton, Hillersdon and Rye houses. This is due to passes being recorded within the anticipated emergence and re-entry time for pipistrelle species. Potential roost chattering was also recorded prior to echolocation calls approximately 18 minutes after sunset by the automated detector on the southern façade of Bridge house on 29th June. The emergence and re-entry surveys also indicate the presence of a common pipistrelle day roost in Dalton house, with a potential access point associated with slipped tiles on the roof at the eastern end of the southern façade.

Overall, the survey results suggest the potential presence of day roosts for low numbers of male or non-breeding female common and soprano pipistrelle bats over the summer period. This type of roost is of low conservation importance.

Given the low levels of activity at the site, including the automated survey in late June and early July, the results do not indicate the presence of a larger maternity roost (acknowledging that no emergence or re-entry surveys were

possible during the earlier part of the season (May to July)). Low numbers of bats may also roost in the lofts during the hibernation period (November to March), which were inaccessible due to the possible presence of asbestos. There are no cavity walls that pipistrelles could hibernate within and basements below shop frontages are partly occupied and are not externally accessible.

Important Advice:

Survey maps that must be included in this section of the Method Statement, or as separate documents if preferred, are listed in *section I "Map checklist" at the end of this document*.

Insert survey figures, photographs etc below here if not submitting them as separate documents

D Impact assessment in absence of mitigation or compensation for each species / roost type

(also see section 6 of the Bat Mitigation Guidelines). Where appropriate you must take into consideration cumulative impacts of your proposals on the bat species and populations identified in your survey in each section.

Guidance on quantifying roosts for the purpose of licensing: To be considered the same roost, the locations need to have the same **functional** and **qualitative** (e.g. physical) characteristics, be used by the **same species** for the **same purpose** (e.g. day roosting) and be within the **same building / structure**. If the physical characteristics are different (e.g. one roost is in external crevices in the wall and the other is in the roof void against internal timbers) then they should be considered different roosts - because they offer bats different roosting opportunities. If the physical characteristics are similar and provide the same functional characteristics, used by the same species for the same purpose (e.g. transitional roost) but with different individual roosting locations within the overall building / structure, that could be considered one transitional roost. If two species are using an area which provides the same characteristics, for the same function, it is still two roosts - as there are two species.

D1 Initial impacts: The impact/s of activities undertaken on site pre-development and during works must be considered and explained. **Consider disturbance** (such as human presence, noise, vibration, dust, lighting, access obstruction due to scaffolding and plastic sheeting etc), **temporary damage and temporary loss of roosts and injuring/killing**.

E.g. Unsupervised contractor removing roof tiles has the potential to crush 3 common pipistrelle bats using the roof tiles as day roosts. Major negative impact at a site level; Demolition of an extension to a building will take place adjacent to a maternity roost of common pipistrelle bats situated under the soffit board of the retained building. Potential for significant disturbance if demolition works are undertaken during the maternity period through vibration, noise and dust. Medium negative impact on a local level.

Phase 1 and 1A demolition has potential to result in the loss of PRFs for common and soprano pipistrelle, disturbance to bats and a risk of injury/killing during the works. Three potential roosts will be lost within Dalton (common pipistrelle), Hillersdon (common pipistrelle) and Pimlico (soprano pipistrelle) houses.

Night-time lighting during demolition will be limited. There will be bulkhead lights on hoarding to provide navigation across the site. Furthermore, lighting will be required at the start and end of the working day during the autumn and winter months. Given the levels of lighting at the site currently, this is unlikely to disturb foraging and commuting bats. The park will not need to be lit to facilitate demolition works and thus there will be no additional lighting in the vicinity of the proposed bat boxes.

Confirm number of roosts to be damaged: 0

D2 Long-term impacts: Consider and explain the impacts of the proposed works on the different species populations at a site, local, regional, and national level.

D2.1. Roost modification: e.g. changes to roosts/access points, new entrances (including human access e.g. for servicing/maintenance etc), change in size of roost space, changes in air flow, temperature and humidity, light etc. Please detail the access points into each roost and the type/s of roosts which will be modified.

E.g. Non-mitigated changes to the roof structure, which requires replacing, will lead to the modification of 3 access points into a common pipistrelle maternity roost which will result in bats being unable to enter or exit the roost. Moderate negative impact on a local level.

There will be no long-term roost modification impacts in the absence of mitigation strategy, as the roosts will be destroyed by the proposed demolition.

Confirm number of roosts to be modified: 0

D2.2. Roost loss: Loss or deterioration of roosting sites, access points, habitat, etc must be considered. Please detail the access points into each roost and types of roost/s which will be lost.

E.g. Demolition of building reference X in June will lead to the loss of a night roost in the porch used by 1 lesser horseshoe bat and the loss of a maternity brown-long eared bat roost in the loft space. This will lead to the death and/or injury of bats including dependent young and permanent destruction (loss) of both roosts. Moderate negative impact at a site level for lesser horseshoe bats and moderate negative impact at a local level for brown-long eared bats.

The demolition of Dalton, Hillersdon and Pimlico houses has potential to lead to the loss of common and soprano pipistrelle day roosts. Demolition of Wellesley and Mercer houses will also lead to PRFs of moderate potential to support common and soprano pipistrelle. The demolition also has potential to result in disturbance to bats and a risk of injury/killing during the works. Low negative impact at a local level for common and soprano pipistrelle bats.

Confirm number of roosts to be destroyed: There is potential for the demolition of Dalton, Hillersdon and Pimlico houses to result in the destruction of three roosts.

D2.3. Fragmentation and isolation: Will the proposed works results in these impacts? E.g. loss of linear features such as hedges, tree lines, increased lighting, severance of flight lines by roads/rail lines, separation of breeding/hibernation sites from feeding grounds, etc.

E.g. In addition to the removal of common pipistrelle day roosts in trees along the proposed road, removal of hedgerows, shown on Figure D, and the construction of the new road will fragment a significant commuting and foraging route for a lesser horseshoe maternity roost. This may cause a reduction in the long term success of the breeding colony of lesser horseshoes by restricting existing foraging range or killing bats on the road. Potentially major negative impact at a site and local level.

Sixteen trees will be removed to facilitate demolition (refer to Figure D Impacts Plan (tree removal)). Given the scale of tree removal in the context of the site, this is unlikely to impact bat foraging and commuting corridors and does not have potential to lead to fragmentation.

D3 Post-development interference impacts: e.g. extra street lighting or other external lighting, use of loft space as storage, increased noise. Please also consider other direct or indirect post development impacts which may include disturbance/ injuring/killing.

E.g. Security lighting being installed will shine on the brown-long eared bat maternity roost access points which may affect emergence patterns and lead to a reduction in foraging times. This may cause a reduction in the long term success of the breeding colony or cause the roost to be abandoned. Moderate to high negative impact at a site and local level.

The existing urban environment surrounding the site is characterised by active residential blocks and major roads, both of which are associated with noise and night time lighting. However, there is potential for lighting during operation to disturb foraging, commuting and roosting bats.

The lighting strategy for the Proposed Scheme has only been developed in detail for Phase 1 (relating to the detailed element of the planning application). Lighting fixtures will employ LED technology and the scale of fittings, such as illuminated bollards and lighting mounted on columns no higher than 5m will help minimise light spill and therefore disturbance to bats. However, the specifics concerning the locations and types of lighting near the bat boxes has not been designed as these are located within Phases 2 and 3. In the absence of mitigation, there remains a low negative impact at a local level on common and soprano pipistrelle bats.

D4 Predicted scale of impact of this development/activity on species status (also see section 6.5 of the Bat Mitigation Guidelines and the BCT's Bat Survey Good Practice Guidelines): Please complete the following table to explain what this is likely to be at the site, local/county and regional levels for each roost type and species. Add additional lines when necessary

Roost types to be referenced as: Day, Night, Feeding Perch, Transitional, Satellite, Maternity, Hibernation confirmed, Foraging Area, Commuting Route, Swarming Site, Other.

Species and Numbers (which will be affected at the time works will be undertaken)	Roost type	Predicted scale of impact (<i>place X in relevant column</i>)			Notes (include impact on roost – damage / destruction /modification etc)
		Site	County	Regional	
Common and soprano pipistrelle	Day	x			Potential permanent loss of three two roosts. Due to the likely small number of bats present this is considered to be of local/parish significance.

****Please note** that you can add more rows to the table: right click in any cell outside the grey box area. Choose Insert > Insert rows below.

Provide further comments/explanation as required (this helps understand how the impacts will be mitigated or compensated for when assessing section E):

As Dalton, Hillersdon and Pimlico houses each have potential to accommodate a day roost of a common bat species, it is unlikely that the favourable conservation status of the species will be impacted by these works. The predicted scale of impact, in the absence of mitigation, is predicted to be low and not considered to be of significance beyond the local level because the low level of use recorded suggests that individual bats are highly likely to have access to alternative roosting sites in the vicinity of the site.

The site is located in a highly urbanised area and future development is unlikely to cause a significant effect on the bat population comparing to the current baseline. Therefore, the proposed works are not likely to contribute to resulting cumulative impacts which could have a larger impact in the long-term.

Important Advice:

Please ensure that a separate 'Impact map' is provided ([Figure D](#)) which must show all structures or habitats (clearly referenced) that will be disturbed, damaged or destroyed, detailing where the roosts and access points are etc. Also see section 1 "Map checklist" at the end of this document.

E Mitigation and Compensation (please also see section 7 and 8 of the Bat Mitigation Guidelines)

E1 Please explain why this design was chosen over other potential solutions - set out what other designs were considered and why they were not feasible (e.g. if the proposal is to construct a new stand-alone roost, explain why it is not possible to retain the roost in the existing structure etc). The mitigation solution being proposed in the method statement should be the one that delivers the 'need' with the least impact on the bat population.

The mitigation strategy will ensure that common and soprano pipistrelles can continue to roost at the site in the long-term through the provision of bat boxes prior to the demolition work. The Proposed Scheme involves the demolition of all the buildings at the site and thus it would not be feasible to retain the potential roosts.

Bat boxes will be erected on retained trees to ensure that bats have alternative roosting habitat ahead of demolition and to provide locations to translocate any bats captured during the soft strip. These boxes will subsequently be retained post-works to provide permanent compensatory roosting opportunities. Trees were selected over artificial poles to integrate these features within the landscape strategy. Offsite greenspaces that would not be under development were considered, though none were identified that would be free from development and under management by the client. Four bat boxes would be installed on retained trees (T9 and T14 – refer to Figure E3, existing and proposed site) in an area of the site that would be least disturbed by demolition and construction activities, which would be retained permanently within the Proposed Scheme. This comprises four bat boxes with the type equivalent to the Large Multi Chamber WoodStone Bat Box (<https://www.nhbs.com/large-multi-chamber-woodstone-bat-box>).

Long-term permanent roost provision will also be provided within the proposed buildings through the installation of six bat boxes integrated within the new building facades, with the type of Habitat Bat Box (<https://www.nhbs.com/habibat-bat-box-plain-for-rendering>) or equivalent. This was chosen to provide a permanent low maintenance solution that would be seamlessly integrated into the building fabric, recognizing that bat boxes on trees within an urban environment can be subject to vandalism as well as natural decay/damage.

An emergence survey will be conducted in late May / early June 2020 with the aim of identifying specific roost locations and access points and inform the mitigation strategy with respect to the use of one-way permanent excluders and implementation of a soft strip.

Should the emergence survey identify specific roost location that can be excluded, one-way permanent excluders would be installed prior to the demolition of the buildings, from June to October inclusive, when bats are active. This approach will be taken given the lack of clarity concerning the specific roost locations following the surveys undertaken to date and to confirm the presence of day roosts rather than maternity. Each building would subsequently be subject to a destructive search by way of a soft strip ahead of hard demolition to ensure the absence of bats in the roost during demolition. This would focus on areas at roof level where there are voids and PRFs were recorded.

The location of the boxes is described under Section E2 below and is also shown on **Figure E3**.

E2.2 Capture and release (if applicable):

Please confirm that you agree to undertake the following procedures for the capture and exclusion of bats, where these are applicable:

- a. The use of endoscopes, artificial light from torches, destructive search by soft demolition (see Definitions), temporary obstruction of roost access, temporary or permanent exclusion methods (including installation) and use of static hand held nets must only be undertaken or directly supervised by the Named Ecologist, or an Accredited Agent.
- b. Where capture and/or handling of bats are necessary, only the Named Ecologist, Accredited Agent, or an Assistant directly supervised by the Named Ecologist may do so. Capture/handling/exclusion of bats must only be undertaken in conditions suitable for bats to be active.
- c. Where bats are discovered and taken (excluding unexpected discoveries during adverse weather conditions) they must either be relocated to an alternative roost (see Definitions) suitable for the species, or where bats are held this must be done safely and bats released on site at dusk in, or adjacent to, suitable foraging/ commuting habitat in safe areas within or directly adjacent to the pre-works habitat.
- d. Endoscopes and hand held nets are only to be used to assist with the locating and capture of bats.
- e. Temporary and permanent exclusion must be carried out using techniques specified in the most up to date edition of the '*Bat Workers Manual*'. If one-way exclusion devices are to be used, each device must remain in position for a period of at least 5 consecutive days/ nights throughout a spell of suitable weather conditions, or remain longer until these conditions prevail.
- f. Prior to destructive works, an inspection using torches and/or an endoscope must be performed internally to search for the presence of bats. If any licensed vesper bat species is found and is accessible, each will be captured by gloved hand or hand-held net, given a health check and then each placed carefully inside a draw-string, calico cloth holding bag or similar for transport. If any licensed horseshoe bat species is found, the capture methods outlined in (h) will only be used after it has been shown that overnight dispersal or exclusion are no longer practicable methods.
- g. Following inspection and exclusion operations, the removal of any feature with bat roost potential, will be only performed by hand in suitable weather conditions and under direct ecological supervision. Where applicable, materials will be removed carefully away and not rolled or sprung to avoid potential harm to bats. The undersides of materials will be checked by the Named Ecologist or Accredited Agent for bats that may be clung to them before removal.
- h. For sites where the presence of horseshoe species has been confirmed, the following exclusion method will be used: prior to work commencing, the Named Ecologist or Accredited Agent will conduct a thorough internal inspection for the presence of horseshoe bats. Only after the void is shown to be unoccupied will the destructive search commence, or all apertures into that void be closed and sealed (windows, doors, etc) by use of boarding, sealed tarpaulin or similar.

If a horseshoe bat is encountered, it will be left undisturbed during daylight. After all bats have dispersed overnight, the void will be sealed as described above. If all bats have not emerged, the Named Ecologist will either use torchlight and non-tactile human presence to disturb the bat to encourage it to emerge and disperse, during night only, or through use of a hand held net. Only after all bats have emerged from the building or void will it be sealed.

Yes, I agree / No, I don't agree
Yes

If NO, please provide justification below. Please use this text box to describe any additional information on protocols to be employed if bats are found during works. Non-standard capture and exclusion apparatus must be shown on **Figure E2**.

Method: Precautionary Measures During Demolition

The demolition of the buildings will be done under the watching brief of the Named Ecologist or their Accredited Agent, who will be available at all stages of the works to deal with any unexpected encounters with bats (or nesting birds).

A tool box talk will be given to the demolition contractor undertaking demolition prior to works.

Capture will only be undertaken if necessary (e.g. in the unlikely event that any bats are found during the destructive search) to move bats out of the way of works, to a place of safety. Should a bat be found during the soft stripping, it would be taken immediately by the Named Ecologist or their Accredited Agent by hand (wearing gloves) and transferred into a drawstring cloth bag. The bat will then be carefully released into one of the boxes previously installed on site. A cloth would be used to block up the access hole on the box to allow the animal(s) to settle inside the box until the end of the working day or at dusk (whichever is soonest), when it would be removed, allowing the bat(s) to leave the box on their own accord and at a time that is more usual for bats to be active and flying out in the open.

Any injured bats or bats requiring supplementary feeding will be taken immediately into care (as directed by the Bat Workers Manual, s.7.3, pp. 64-66; 3rd edition, Mitchell-Jones & McLeish, 2004) by the Named Ecologist (Chloe Delgery), who is a registered volunteer bat carer with the Bat Conservation Trust and local bat groups. This has been agreed with the Named Ecologist.

If a new roost of a rarer species or an additional roost of any species is found then Natural England would be consulted and, if appropriate, a licence amendment would be requested.

Given that a soft strip and potentially also permanent one-way excluders would be used prior to the demolition of the buildings to exclude bats from the roosts, it is not anticipated that any bats will need to be captured (as described above). However, should any bats be found during the works, these would likely be common or soprano pipistrelle bats and numbers would be likely to be low.

Should your proposals include capture (taking) please specify numbers of each species that will be affected at the time the works are to be undertaken:

Species	Expected number of bats to be captured at the time works will be undertaken. <i>Note: this may be different to the number of bats using the roost at its optimum time as timings for works will be at a time when bats are least likely to be present.</i>
Common pipistrelle	4
Soprano pipistrelle	2

*** Please note that you can add more rows to the table: right click in any cell outside the grey box area. Choose Insert > Insert rows below.*

E3 Bat roost and access point retention, modification and creation: Please detail how all impacts to each species (as identified in sections C and D) will be mitigated. If not applicable to your proposals please state 'N/A' in the relevant text boxes.

Please note that breathable roofing membranes must not be installed into a roof used by bats. If the use of roof membranes is necessary, only Bitumen type 1F felt with a hessian matrix will be permitted under licence:

N/A

E3.1 Retention of existing roost(s) – Works may include, for example, maintenance works that result in no material changes to the roost but may cause disturbance or temporary damage e.g. temporary exclusion of a roost to allow investigative and repair works to a bridge. Provide details of all works including:

- Number and description of roosts to be retained, with an explanation of how they will be retained. Confirm dimensions to be retained.

N/A

- Number of access/entrance points to be retained and how this will be achieved. If enhancements to the roosts will be provided, such as through crevice provision, please detail.

N/A

- Mitigation for any other impacts e.g. new lighting at the site.

N/A

E3.2 Modification of existing roost(s) - *Works may include, for example, reduction in roof void height, change of tiles and roof lining (stating the type of membrane that will be used), alteration of access point through replacement of soffits etc. Please provide the following:*

- Dimension details of modified roosts: clearly state what the original roost dimensions were and what the dimensions of the modified roost will be.

N/A

- Dimension details of modified access points: clearly state how the access points are being modified.

N/A

- Details of any other modifications to be made to roosts.

N/A

- Mitigation for any impacts of lighting on the modified roost/s if appropriate.

N/A

E3.3 New roost creation (including bat houses, cotes and bat boxes etc).

Note – creation of compensation for high impact cases (e.g. loss of a maternity roost) must be protected in the long term. Any bat boxes or roost structures that are part of a licence proposal which do not show signs of bats must be retained for a minimum of 5 years from date of completion of the development/works. Typically this will

be around 5 years for low conservation status roost compensation (e.g. bat boxes) and longer for other significant roosts (e.g. bat houses, lofts etc). The exact time period will be specified in any licence issued. For high conservation status roost loss, the compensation roost/s must still be protected in the long term by another means (such as a s106 agreement), which is particularly important if the structure is likely to change ownership.

E3.3a Please complete the table below for the species and roost types listed. For all other species and roost types please provide information under **E3.3b**.

Species & Roost type for which new roost creation will be provided	New roost creation		
	Compensation should be in line with the <i>Bat Mitigation Guidelines</i> . Where compensation is being provided, there should be at least one compensation feature, suitable for the species concerned, per roost and per species to be impacted , OR If a proposal impacts more than one bat species and / or roost type then cumulative impacts must be considered when designing the compensation; this should always be in line with the species and / or roost type which will be subject to the greatest impact and ensure that the requirements of all species impacted are met.		
	Compensation Feature	Quantity	Location of Compensation Feature (as shown on Figure E3)
Common pipistrelle <input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A <i>Day roost</i> <i>Night roost</i> <i>Feeding</i> <i>Transitional/Occasional</i>	<input checked="" type="checkbox"/> Bat box <input checked="" type="checkbox"/> Integrated bat box/ bat brick/ bat tube <input type="checkbox"/> Bat tile (including ridge tile) <input type="checkbox"/> Other (specify): <input type="checkbox"/> None	4 6	<input type="checkbox"/> In same building <input type="checkbox"/> In other existing building on site <input checked="" type="checkbox"/> In new building <input checked="" type="checkbox"/> Other (specify): On nearby retained trees
Soprano pipistrelle <input checked="" type="checkbox"/> Yes <input type="checkbox"/> N/A <i>Day roost</i> <i>Night roost</i> <i>Feeding</i> <i>Transitional/Occasional</i>	<input checked="" type="checkbox"/> Bat box <input checked="" type="checkbox"/> Integrated bat box/ bat brick/ bat tube <input type="checkbox"/> Bat tile (including ridge tile) <input type="checkbox"/> Other (specify): <input type="checkbox"/> None	4 6	<input type="checkbox"/> In same building <input type="checkbox"/> In other existing building on site <input checked="" type="checkbox"/> In new building <input checked="" type="checkbox"/> Other (specify): On nearby retained trees.
Whiskered <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A <i>Day roost</i> <i>Night roost</i> <i>Feeding</i> <i>Transitional/Occasional</i>	<input type="checkbox"/> Bat box <input type="checkbox"/> Integrated bat box/ bat brick/ bat tube <input type="checkbox"/> Bat tile (including ridge tile) <input type="checkbox"/> Other (specify): <input type="checkbox"/> None		<input type="checkbox"/> In same building <input type="checkbox"/> In other existing building on site <input type="checkbox"/> In new building <input type="checkbox"/> Other (specify):

Brandt's <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A <i>Day roost</i> <i>Night roost</i> <i>Feeding</i> <i>Transitional/Occasional</i>	<input type="checkbox"/> Bat box <input type="checkbox"/> Integrated bat box/ bat brick/ bat tube <input type="checkbox"/> Bat tile (including ridge tile) <input type="checkbox"/> Other (specify): <input type="checkbox"/> None		<input type="checkbox"/> In same building <input type="checkbox"/> In other existing building on site <input type="checkbox"/> In new building <input type="checkbox"/> Other (specify):
Daubenton's <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A <i>Day roost</i> <i>Night roost</i> <i>Feeding</i> <i>Transitional/Occasional</i>	<input type="checkbox"/> Bat box <input type="checkbox"/> Integrated bat box/ bat brick/ bat tube <input type="checkbox"/> Bat tile (including ridge tile) <input type="checkbox"/> Other (specify): <input type="checkbox"/> None		<input type="checkbox"/> In same building <input type="checkbox"/> In other existing building on site <input type="checkbox"/> In new building <input type="checkbox"/> Other (specify):
Natterer's <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A <i>Day roost</i> <i>Night roost</i> <i>Feeding</i> <i>Transitional/Occasional</i>	<input type="checkbox"/> Bat box <input type="checkbox"/> Integrated bat box/ bat brick/ bat tube <input type="checkbox"/> Bat tile (including ridge tile) <input type="checkbox"/> Other (specify): <input type="checkbox"/> None		<input type="checkbox"/> In same building <input type="checkbox"/> In other existing building on site <input type="checkbox"/> In new building <input type="checkbox"/> Other (specify):
Brown long-eared <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A <i>Day roost</i> <i>Night roost</i> <i>Feeding</i> <i>Transitional/Occasional</i>	Note: boxes for this species will only be acceptable in certain circumstances, where this is justified on an ecological basis <input type="checkbox"/> Bat box, justification <input type="checkbox"/> Other (specify): <input type="checkbox"/> None		<input type="checkbox"/> In same building <input type="checkbox"/> In other existing building on site <input type="checkbox"/> In new building <input type="checkbox"/> Other (specify):
Serotine <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A <i>Day roost</i> <i>Night roost</i> <i>Feeding</i> <i>Transitional/Occasional</i>	Note: bat boxes are not suitable for this species. Compensation should replicate, as closely as possible, the existing roost: <input type="checkbox"/> Bat tile <input type="checkbox"/> Bat brick <input type="checkbox"/> Other (specify):		<input type="checkbox"/> In same building <input type="checkbox"/> In other existing building on site <input type="checkbox"/> In new building <input type="checkbox"/> Other (specify):

Lesser Horseshoe <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A <i>Day roost</i> <i>Transitional/Occasional</i>	A proportionate number of bat features suitable for the species. The provision of one feature, suitable for the species concerned (eg void) per roost to be impacted will be considered appropriate: Specify:		<input type="checkbox"/> In same building <input type="checkbox"/> In other existing building on site <input type="checkbox"/> In new building <input type="checkbox"/> Other (specify):
--	--	--	---

E3.3b For all species and roost types not covered in the above table please provide the following:

- New roost dimension details or features (to include bat tiles/boxes as applicable).

N/A

- Access points and size of access points.

N/A

- Location details (including an 8-figure grid reference for bat houses or bat lofts relating to the structure. 8-figure grid references are not required for positions of individual boxes, tiles etc).

N/A

- Aspect. Explain how the internal conditions of the roost will be created.

N/A

- Details of the materials to be used e.g. timber, sarking, felt etc.

N/A

- Justification for any variation from the original roost and/or deviations from recommendations in the Bat Mitigation Guidelines. (*Diagrams of widely available standard bat box designs are not required; just refer to bat box name and reference number, e.g. Schwegler 1FF*).

N/A

- Mitigation for any impacts of lighting if appropriate.

N/A

- Structures for access for monitoring / maintenance purposes (if applicable)

N/A

E3.4 Other habitat re-instatement or creation (e.g. retention of existing flight lines, retention or creation of appropriate vegetation around roost entrances where applicable) – please include details of:

- Habitat replacement (following works resulting in temporary impacts) or creation not covered by sections E2 to E3 such as hedgerow/woodland planting or enhancement. State the length of hedgerow planting and areas (ha) of other planting to be provided such as woodland and anticipated establishment period etc.

N/A

- Creation of flight lines/routes of connectivity.

N/A

- Foraging area enhancements, etc

The Landscape Strategy for the Proposed Scheme incorporates a range of habitats such as rain gardens and planting inspired by native woodland. At the first floor, between buildings, elevated podium space at Level 1 will contain areas of planting with a substrate depth suitable for grasses and small trees. Whilst these are predominantly amenity spaces for end users, these areas would provide habitat for foraging and commuting bats. Moreover, these podium spaces promote connectivity for bats between Network Rail land to the east, and ground level landscaping within the rest of the Proposed Development. These habitats would take time to mature but, in the long-term, they would incorporate a diversity of species that would attract insects and provide improved foraging habitat for bats. In addition, a green corridor running north-south, where the historical canal once stood, has been incorporated into the Proposed Scheme to provide foraging and commuting habitat.

- Mitigation for any impacts of lighting if appropriate.

There would be no night time working during demolition and construction. The Demolition Management Plan and Construction Environment Management Plan will be developed in consultation with an ecologist to ensure compliance with good practice guidance (Bat Conservation Trust and the Institution of Lighting Professionals, (2018); 'Bat Guidance Note 08/18 Bats and artificial lighting in the UK. Bats and the Built Environment series.'). This will also avoid lighting on the bat boxes and minimal lighting in these areas.

Consultation is ongoing with the architect to integrate appropriate measures within the Design Code to mitigate impacts on foraging, commuting and roosting bats during the operation of the Proposed Scheme. This will ensure that the lighting design is developed in consultation with an ecologist; that it avoids lighting on the bat boxes and minimises light levels in these areas; and is developed in accordance with current guidance (Bat Conservation Trust and the Institution of Lighting Professionals, (2018); 'Bat Guidance Note 08/18 Bats and artificial lighting in the UK. Bats and the Built Environment series.'). This will maximise the value of the proposed landscaping for roosting, foraging and commuting bats. The final design would adhere to good practice guidance by reducing skyglow and using warm lighting.

E3.5 Wider biodiversity gains:

Please indicate if enhancements, over and above what is necessary to mitigate the impact of the activity of the licence proposal, are being provided. Please indicate if enhancements are included to satisfy the requirement of a planning permission, and if so state the relevant planning condition, or other consents in your response below. Please also state if an applicant wishes to provide more than is typically required to mitigate for the impacts. Enter N/A if this is not applicable to your application.

Note: Any licence granted will only cover mitigation and compensation required to fulfill licensing requirements, but will acknowledge additional biodiversity enhancements.

Approximately 260 new trees will be planted within the site as part of the Proposed Scheme to compensate for the loss of scattered trees. These would comprise species such as swamp Spanish oak *Quercus palustris* and silver birch *Betula pendula*. Both native and non-native species have been selected to benefit biodiversity and be of a provenance that would tolerate future predicted conditions as a result of climate change. New tree planting will typically have a minimum trunk diameter of 18-20cm. Although new trees will take time to mature, this not only provides appropriate mitigation for the habitat lost, but also enhances the future quality of habitat (once established and mature), which would be of long-term benefit to biodiversity including bats onsite.

Important Advice:

Scaled maps/plans of mitigation/compensation must be provided as separate maps/figures (also **see section I "Map checklist" at the end of this document**):

- **Figure E2** if non-standard capture and exclusion apparatus is proposed please include diagrams/photographs.
- **Figure E3** to show specifications for mitigation / compensation to be provided and annotate where it will be provided. Should the scheme be large or complicated it may be necessary to submit more than one figure.

NOTE: It must be possible to compare these with the survey results plan (**Figure C6**) and 'Impacts' Figure (**D**).

E4 Post-development site safeguard: Further guidance and explanation on post-development monitoring requirements are included within our 'How to get a licence' document http://www.naturalengland.org.uk/Images/wml-g12_tcm6-4116.pdf. Also see Section 8.7 of the Bat Mitigation Guidelines.

E4.1 Habitat/site management and maintenance: Is any specific post-development habitat management and site maintenance planned? If 'No', state 'N/A'. If 'Yes' include the following:

- The period (years and months) for which habitat management and maintenance will take place. Ensure that this is consistent with the post development works detailed in section **E5b** of the **Work Schedule document, WML-A13-a-E5a&b**.

The bat boxes will be monitored and maintained in years 1, 3 and 5 following the completion of construction (2028, 2030 and 2032) between April and October, when bats are active. The boxes will be inspected by a licensed bat worker, ideally in April or September-October which is outside of the breeding and hibernation periods. The features that will be subject to monitoring are shown on **Figure E4**.

- Details of what will be undertaken in terms of site maintenance required to ensure long-term security of the affected population (e.g. maintain, repair or reinstate access points; maintain and repair heaters and /or data loggers; maintain, repair or restore bat feature / bat loft in good condition; repair or replace inspection hatches; management and maintenance of lighting regime, or bat boxes etc).

Bat boxes will be inspected, including tasks of checking for signs of bats, removing of any nesting material/detritus and checking for damage and the need for replacement. Should it not be feasible to inspect the integrated bat boxes, these would be subject to emergence/re-entry surveys.

The bat boxes have a sloped or open access hole at the bottom that prevents the build-up of droppings that might otherwise require cleaning out. They will also be installed to avoid shading of the boxes and clear access by bats into the boxes. Any vegetation that subsequently obscures the boxes would be removed by maintenance staff as necessary. Replacements will be installed by a licensed bat worker if any are lost or damaged during this period.

A ladder, endoscope and hand torch will be used during bat box inspection. The presence of bats or evidence of use by bats in the bat boxes will be recorded. If bats are present and cannot be easily identified visually, they will be safely extracted from the box and processed in the hand to confirm the species. Handling will be kept to a minimum. Once processed, the bat(s) will be safely put back inside the box, with the opening stuffed with a cotton cloth to give the bat(s) time to settle down and avoid it flying out in the daytime. The surveyors will then wait at least 10 minutes before removing the cloth, and quietly walk away.

Records of bats will be passed to the London Bat Group and GiGL and subsequently released to Natural England as part of the Report Return process once the licence has expired.

- Details of what will be undertaken in terms of habitat management (e.g. planting cover around roost structure, hedgerow management regime, checking establishment of habitat creation; reduction of shade around roosts, woodland management to maintain species and structural diversity etc). Ensure this relates to the relevant map.

Details of the habitat management are currently being finalised but will include an aftercare period of five years with regular monitoring of all planted specimens, ensuring the establishment of new landscape areas and newly planted trees.

Note – for phased or multi-plot developments a separate habitat management and maintenance plan is required, which must be submitted with the master plan: see guidance on phased developments.

Important Advice:

Please include **Figure E4** as a separate figure to show which structures and habitats will be managed, maintained and monitored post development as part of your proposal – also see *section 1 "Map checklist" at the end of this document*).

E4.2 Population monitoring, roost usage etc: This should be in line with the monitoring requirements detailed in the Bat Mitigation Guidelines section 8.7 and Figure 4.

E4.2a Please complete the table below for the species and roost types listed. For all other species and roost types please provide information under E4.2b.

Species	Roost type	Post-development monitoring requirement
---------	------------	---

Common pipistrelle Soprano pipistrelle Whiskered Brandts Daubenton's Natterer's Brown long-eared	<i>Day roost</i> <i>Night roost</i> <i>Feeding</i> <i>Transitional/Occasional</i>	<input type="checkbox"/> None. There is no post-development requirement for proposals affecting bat roosts supporting up to any 3 species indicated, of the roost types listed, where they are used by low numbers of each species. <input checked="" type="checkbox"/> A single presence / absence survey at an appropriate time of year is to be undertaken. This should not take place in the first year following completion of development. Timing (year): Years 1, 3 and 5 following the completion of the proposed works. <input type="checkbox"/> Other (specify):
Serotine	<i>Day roost</i> <i>Night roost</i> <i>Feeding</i> <i>Transitional/Occasional</i>	<input type="checkbox"/> A single presence / absence survey at an appropriate time of year is to be undertaken. This should not take place in the first year following completion of development. Timing (year): <input type="checkbox"/> Other (specify):
Lesser Horseshoe	<i>Day roost</i> <i>Transitional/Occasional</i>	<input type="checkbox"/> A single presence or absence survey at an appropriate time of year to be undertaken in year 2 post development plus a check of the condition and suitability of the roost. <input type="checkbox"/> Other (specify):

E4.2b For all species and roost types not covered in the above table please include details of:

- Timing – state the years and months post development monitoring or other will be undertaken. Ensure that is consistent with the post development works detailed in section **E5b** of the **Work Schedule document WML-A13-a-E5a&b**.

N/A

- The type of monitoring which will be undertaken – include survey methods and equipment to be used. If it is expected any bats are to be taken or disturbed during this period please state anticipated numbers per species against each licensable activity.

N/A

- Specify which compensation/mitigation measures will be subject to monitoring (as referenced on Figure E4).

N/A

Please note that it will be a requirement of the licence to undertake remedial action should monitoring identify that further management/maintenance is required of any compensation/mitigation provided, to ensure that mitigation/compensation measures are working effectively and are fit for purpose.

Important advice: Please always consider whether any *post development* monitoring effort should be staggered over alternate years in cases where use of the compensation measures may not occur in the same year of provision.

E4.3 Mechanism for ensuring safeguard of mitigation/compensation and post-development management, maintenance and monitoring works:

Please explain what mechanism is in place to ensure safeguard of mitigation/compensation provisions (e.g. Restrictive Covenant, clause to relinquish future development rights in S106 agreement, NERC Act agreement, explicit recognition of site in local planning documents, designation as County Wildlife Site or similar.) The need for this, and the type of mechanism, will vary with the scheme and impact. For substantial impact schemes (e.g. destruction of a significant maternity roost, or important hibernation site), some mechanism is always required. If you offer no specific mechanism, explain how you believe the population will be free of threats as far as can be reasonably determined (**the expectation of the granting of a licence should not be used for this purpose**).

It will be the responsibility of JF Hunt to deliver the mitigation/compensation pertaining to Phase 1 and Phase 1A demolition. Beyond this, it will be the responsibility of Westminster City Council as the developer to deliver the mitigation strategy and to engage a suitably qualified and licensed ecologist to undertake specialist works where necessary. It is envisaged that there be a clause within the Section 106 Agreement supporting the Hybrid Outline Planning Permission that the mitigation (in so far as the mitigation proposed sits within the remit of the consented Hybrid Outline Development) be complied with.

Explain how all post-development works (management, maintenance (including remedial action) and monitoring, as appropriate) will be ensured? Include a commitment that the monitoring, habitat management and maintenance work will be undertaken. Mechanism/s for ensuring delivery must be in place before applying for a licence (also see Section F).

Management and maintenance of the bat boxes will be the responsibility of Westminster City Council as the developer. If there is a need for repair or replacement of the bat box a bat specialist will be engaged. It is envisaged that there be a clause within the Section 106 Agreement supporting the Hybrid Outline Planning Permission that the mitigation (in so far as the mitigation proposed sits within the remit of the consented Hybrid Outline Development) be complied with.

E5 Timetable of works: Please complete the **work schedule document WML-A13-a-E5a&b found on the 'bat' application form web page and append to your application pack.**

Important Advice: Please note that from end of March 2014 a separate work schedule is a mandatory requirement to support a new bat licence application when using this template.

F Declarations

If the mitigation/compensation area/s is/are not owned by the applicant, you must have consent from the relevant land owner(s). You must have also secured details of how any measures to maintain the population in the long term will be achieved (e.g. a legal agreement).

F1 Declaration Statement(s) – You must include the following declarations within your Method Statement and include the appropriate answer (Yes/No/Not applicable):

F1.1 Re: section E1 - I confirm that relevant landowner consent/s has/have been granted to accept bats into roosts or access into roosts on land outside the applicant's ownership:

N/A

F2.2 Re: section E2 - I confirm that landownership consent/s has/have been granted to allow the creation of the proposed compensation on land outside the applicant's ownership

N/A

F2.3 Re: section E3 - I confirm that consent/s has/have been granted by the relevant landowner/s for monitoring, management and maintenance purposes on land outside the applicant's ownership

N/A

Comments if applicable:

Important Advice:

Unsecured consents statement:

If you have been unable to secure consents for any of the three declarations please explain why and detail any plans you have in place to obtain the consent(s) or provide details of any right(s) or agreement(s) that will enable the lawful implementation of the proposed mitigation, compensation and monitoring. Failure to provide the appropriate landowner consents means that the Method Statement is unlikely to meet the requirements for the FCS test to be met. It is therefore in your interest to ensure that the appropriate consents have been secured *before* applying for a licence.

G References: List any references cited, and include credits for source information.

H Annexes (supporting documents please append to your application pack)

H1 Pre-existing survey reports;

H2 Raw survey data.

I Check list of figures to be submitted with each Bat Method Statement

With your Method Statement and supporting documents please submit the following maps/figures – see table below. Note that some can be included within the Method Statement itself (if preferred) and others must be submitted individually (i.e. separate documents). Maps/Figures must include the title, site

name as referenced on your application form, date and figure reference. If a grid reference is more applicable (e.g. a bat house is being provided please include this). Include a scale bar (appropriate to the situation e.g. 100m on site maps, 1km on location maps) and direction of North etc.

Additional maps, photographs or diagrams should be included where necessary to adequately explain the scheme.

Figure reference	Mandatory as will be included in the annexed licence, if applicable	Mandatory for assessment purpose only, but will not be included in the annexed licence	What it must show (also see details above on site reference, dating and naming).
Figure B2.1	-	Yes, if the application is part of a phased or multi-plot development	Master plan overview - note – this is not the same as a master plan document, for which you should follow the guidance as stated in section B2.1.
Figure B2.2	-	Yes, if applicable	Locations of other nearby bat licensed sites, or sites which will be impacted on by future development.
Figure C5a	-	Yes	Location map at an appropriate scale for the application (often 1:50,000 or 1:25,000)
Figure C5b	-	Yes	Survey area showing all buildings, structures and habitats that are within the survey area and distinguishing those that were surveyed and those that were not. Indicate where surveyors were located. Aerial photographs should be provided where possible (ensure you have permission to use copy righted maps). If automated detectors were used or transect routes, ensure that these are indicated as appropriate.
Figure C6	-	Yes	Survey results - provide clear, annotated and cross-referenced maps/plans/photographs to show the survey results (access points, location of roosts, flight lines, results of activity surveys where DNA samples were taken etc). Ensure Figure is at a suitable scale to show the results.
Figure D	Yes	-	Impacts plan – map/figure which must show all structures or habitats (clearly referenced) that will be disturbed, damaged or destroyed, detailing where the roosts and access points are.
Figure E2	Yes – but only if applicable to the application	-	Non-standard capture and exclusion apparatus. If these are proposed please include diagrams/photographs.
Figure E3	Yes	-	Specifications for mitigation / compensation (including all dimensions for bat lofts/houses/stand-alone structures and materials to be used etc and 8-figure grid reference). Mitigation / compensation (must show all habitat creation, restoration, boxes). It

			may be necessary to submit more than 1 figure if the proposal is large or complicated.
Figure E4	Yes – when monitoring and maintenance will be included in the licence	-	Monitoring, management and maintenance map. Please indicate the specific structures and habitat that are to be managed, maintained and monitored as part of this licence proposal. Ensure that they are correctly referenced and are consistent with other parts of the Method Statement and figures.

Definitions of roost types to be included in the application (further detail can also be found in the Bat Mitigation Guidelines and the BCT's "Bat Surveys Good Practice Guidelines"):

- a. **Day roost:** a place where individual bats, or small groups of males, rest or shelter in the day but are rarely found by night in the summer.
- b. **Night roost:** a place where bats rest or shelter in the night but are rarely found in the day. May be used by a single individual on occasion or it could be used regularly by the whole colony.
- c. **Feeding roost:** a place where individual bats or a few individuals rest or feed during the night but are rarely present by day.
- d. **Transitional / occasional roost:** used by a few individuals or occasionally small groups for generally short periods of time on waking from hibernation or in the period prior to hibernation.
- e. **Swarming site:** where large numbers of males and females gather during late summer to autumn. Appear to be important mating sites
- f. **Mating sites:** sites where mating takes place from later summer and can continue through winter.
- g. **Maternity roost:** where female bats give birth and raise their young to independence.
- h. **Hibernation roost:** where bats may be found individually or together during winter. They have a constant cool temperature and high humidity. Sites where hibernating bats have been confirmed by appropriate survey effort should be classed as '**hibernation confirmed**'.
- i. **Satellite roost:** an alternative roost found in close proximity to the main nursery colony used by a few individual breeding females to small groups of breeding females throughout the breeding season.
- j. **Other** – please explain what the roost type is if not one of the above (we recognise that roost types are interchangeable and not always easy to classify according to the nuances of certain species).
- k. An '**alternative roost**' shall include: a purposely installed bat box; an existing roost which will not be impacted by the works; or other new/enhanced roosting opportunities. Any alternative roost must be suitable for the species, within or close to the existing roost and free from additional disturbance or development pressure.



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Legend

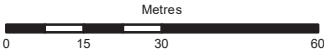
Site boundary

Demolition Phase

Phase 1

Phase 1a

Phase 2



F1	2020-04-21	DT	GT	
Rev	Date	By	Chkd	Appd

Coordinate System: British National Grid

ARUP

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www.arup.com

Client

John F Hunt Ltd

Project Title

Ebury Bridge Renewal

Figure

Masterplan Overview

Scale at A4

1:1,455

Role

Suitability

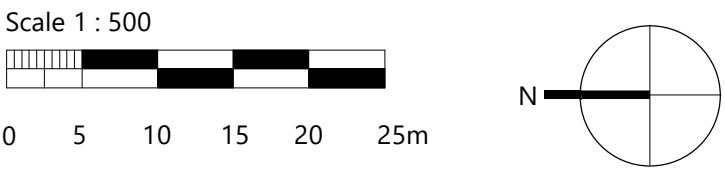
Final

Arup Job No
257461-95

Rev
F1

Name

Figure B2.1



- Legend
- Application Site Boundary
 - Phase 01 Building Construction
 - Phase 02 Building Construction
 - Phase 03 Building Construction
 - Extent of Building Footprint
 - Extent of Podium

P01	Issued For Pre-Planning	xx/02/20	NT	SW	
Rev	Description	Date	Dr	Ap	

Revisions

astudio

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Client



City of Westminster

Project

Ebury Bridge Estate
Ebury Bridge Road, London, SW1X 8QX

Project number	BIM Status	Issue status
19003	S0	WIP

Drawing name

Proposed Site Plan (Phase 01 Detail
Outline Masterplan) – Application

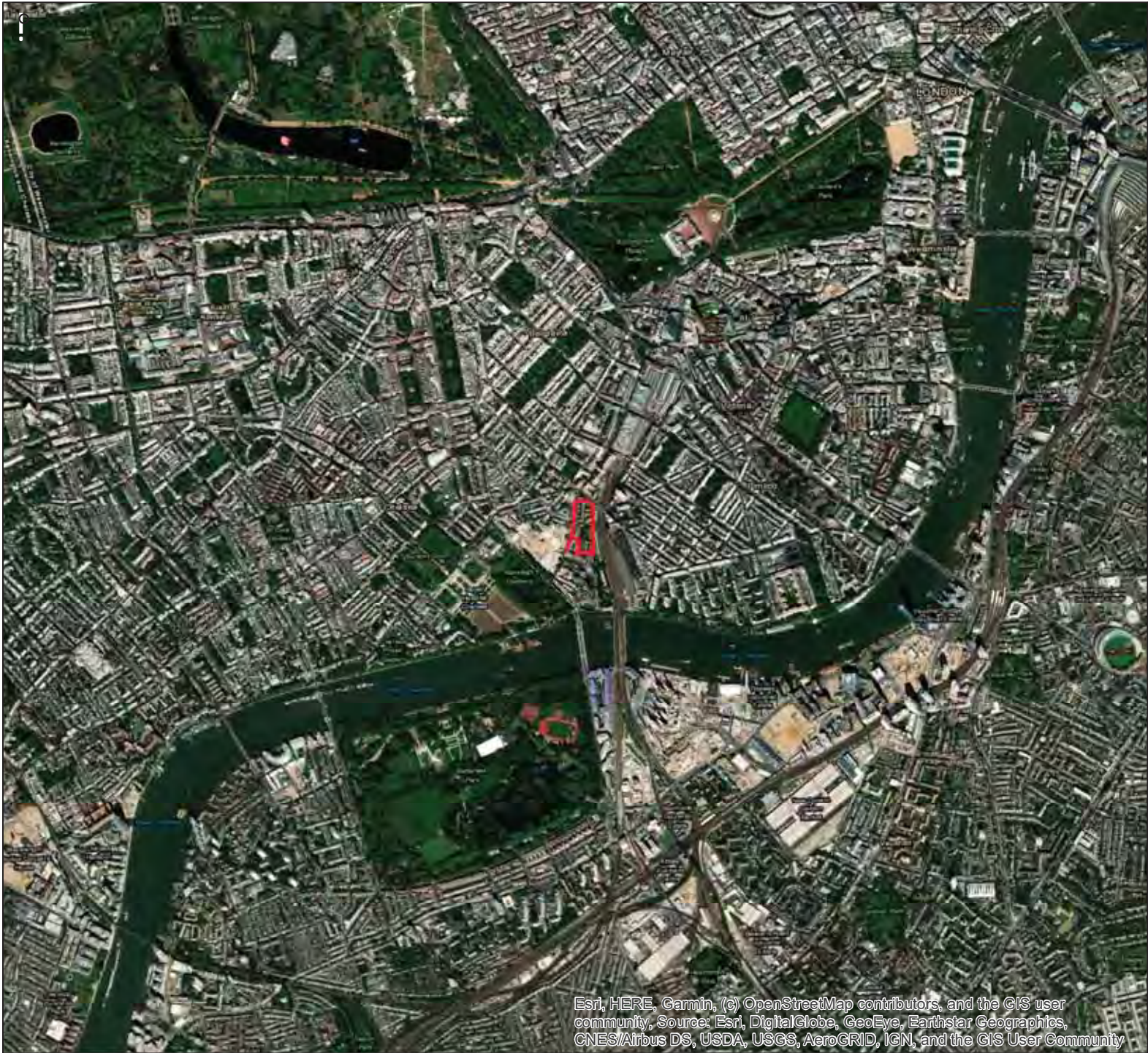
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EBE-AST-XX-XX-DR-A-011200

Project	Orig	Zone	Location	Type	Role	Sequence Number
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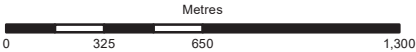
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1 : 500	A1	P01

Disclaimer: This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified immediately of any discrepancy. This drawing is copyright and remains the property of and Astudio Architecture.



Legend

Site boundary



F1	2020-04-28	DT	GT	
Rev	Date	By	Chkd	Appd

Coordinate System: British National Grid

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Client
John F Hunt Ltd

Project Title
Ebury Bridge Renewal

Figure
Location Map

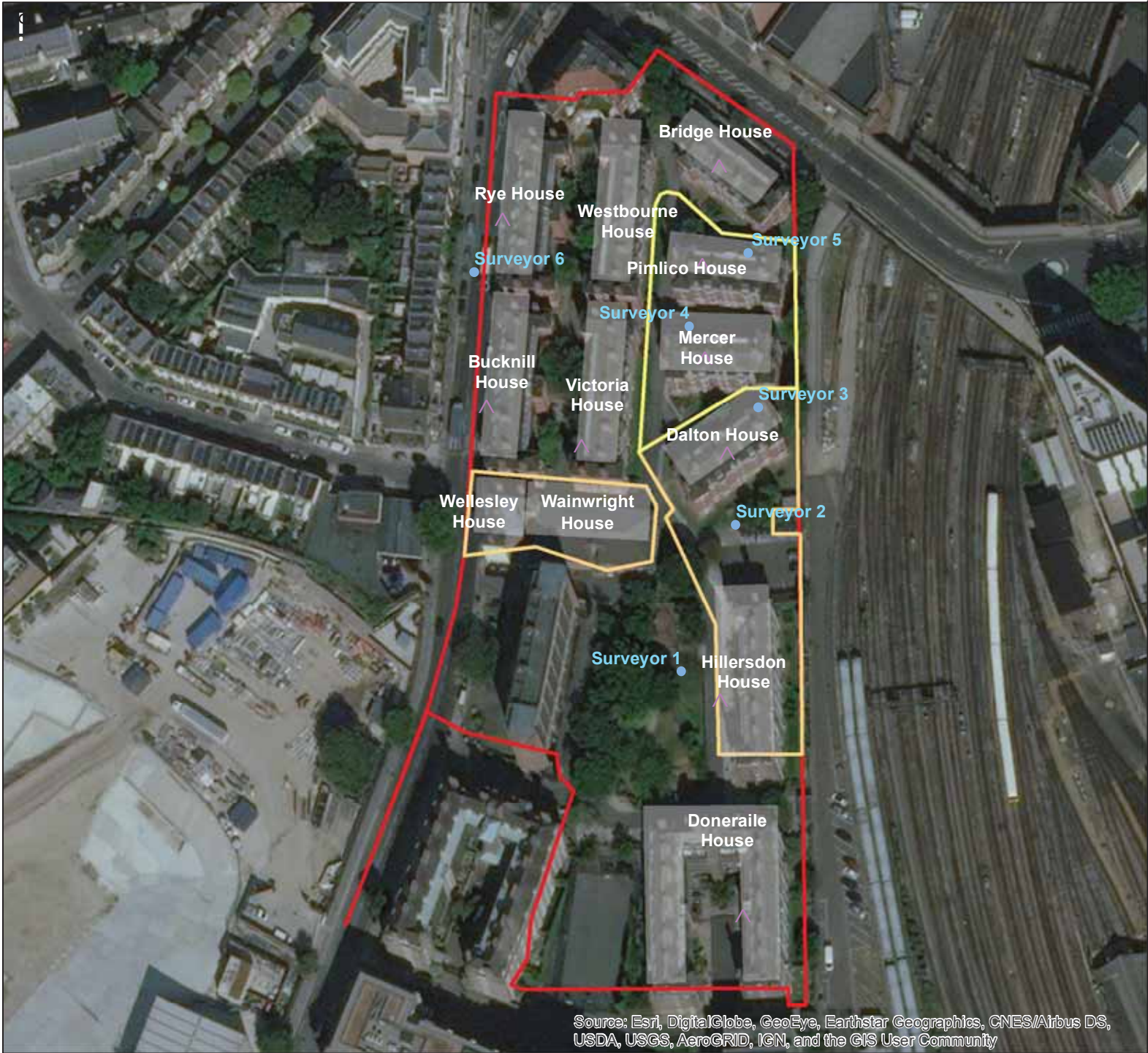
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Role

Suitability
Final

Arup Job No	257461-95	Rev	F1
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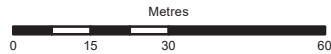
Name
Figure C5a

Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Legend

- Site boundary
- ^ Automatic detectors
- Surveyor locations
- Buildings surveyed
- Phases as part of the licence application**
- Phase 1
- Phase 1a



F1	2020-04-28	DT	GT	
Rev	Date	By	Chkd	Appd

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Client

John F Hunt Ltd

Project Title

Ebury Bridge Renewal

Figure

Survey Area

Scale at A4

1:1,455

Role

Suitability

Final

Arup Job No

257461-95

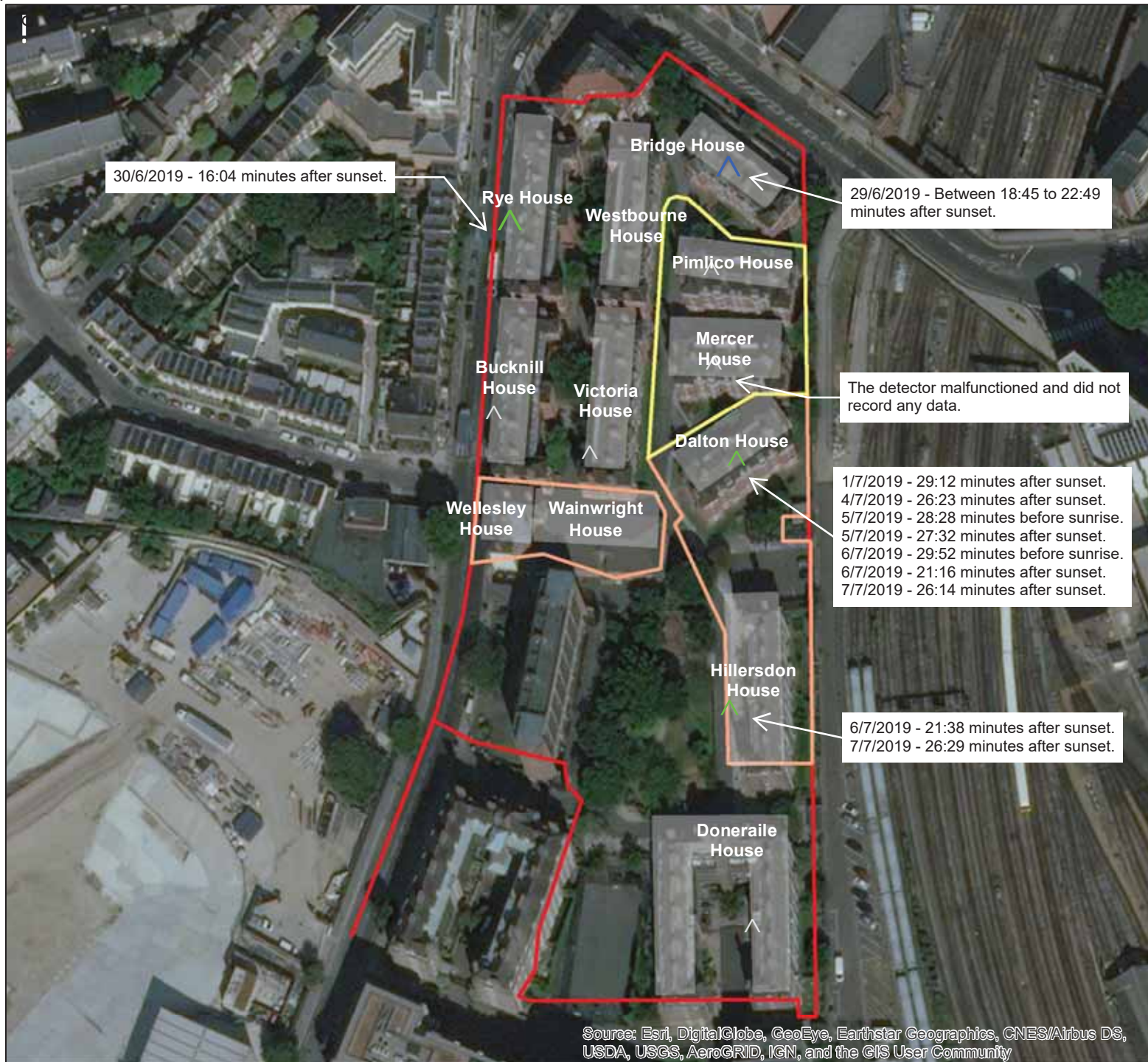
Rev

F1

Name

Figure C5b

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Legend

Site boundary

Automatic detectors

- Common pipistrelle recorded within 20 minutes of sunset/sunrise
- Common pipistrelle recorded within 25 minutes of sunset/sunrise
- Soprano pipistrelle recorded within 20 minutes of sunset/sunrise
- No bats recorded within 30 minutes of sunset/sunrise

Buildings surveyed

Phases as part of the licence application

Phase 1

Phase 1a

Metres
0 15 30 60

F1	2020-04-28	DT	GT	
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Rev	Date	By	Chkd	Appd
-----	------	----	------	------

Coordinate System: British National Grid

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Client

John F Hunt Ltd

Project Title

Ebury Bridge Renewal

Figure

Survey Results - Automated Detectors

Scale at A4

1:1,455

Role

Suitability

Final

Arup Job No

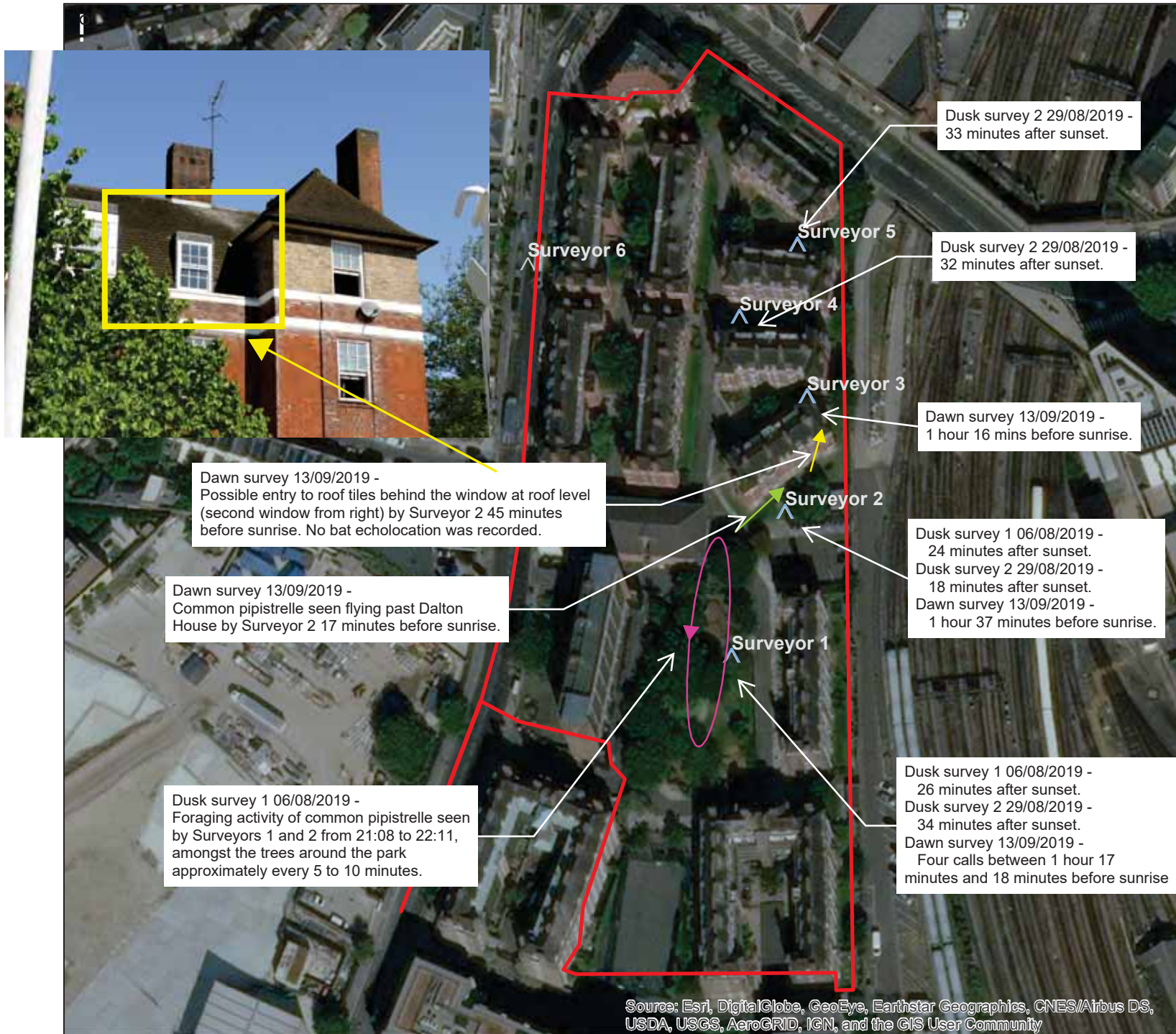
257461-95

Rev

F1

Name

Figure C6



Legend

Site boundary

Common pipistrelle activity

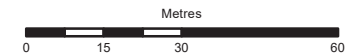
Commuting

Foraging

Possible Entry

Bats heard by surveyor

No bats heard by surveyor



F1	2020-04-28	DT	GT	
Rev	Date	By	Chkd	Appd

Coordinate System: British National Grid

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client

John F Hunt Ltd

Project Title

Ebury Bridge Renewal

Figure

Survey Results - Bat Emergence and Re-entry Surveys

Scale at A4

1:1,455

Role

Suitability

Final

Arup Job No

257461-95

Rev

F1

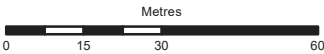
Name

Figure C6



Legend

- Site boundary
- Buildings to be demolished in Phases 1 and 1a
- Potential roost**
 - Potential common pipistrelle roost
 - Potential soprano pipistrelle roost
 - Potential bat access



F1	2020-04-24	DT	GT	
Rev	Date	By	Chkd	Appd

Coordinate System: British National Grid

ARUP

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London W1T 4BQ
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www.arup.com

Client
John F Hunt Ltd

Project Title
Ebury Bridge Renewal

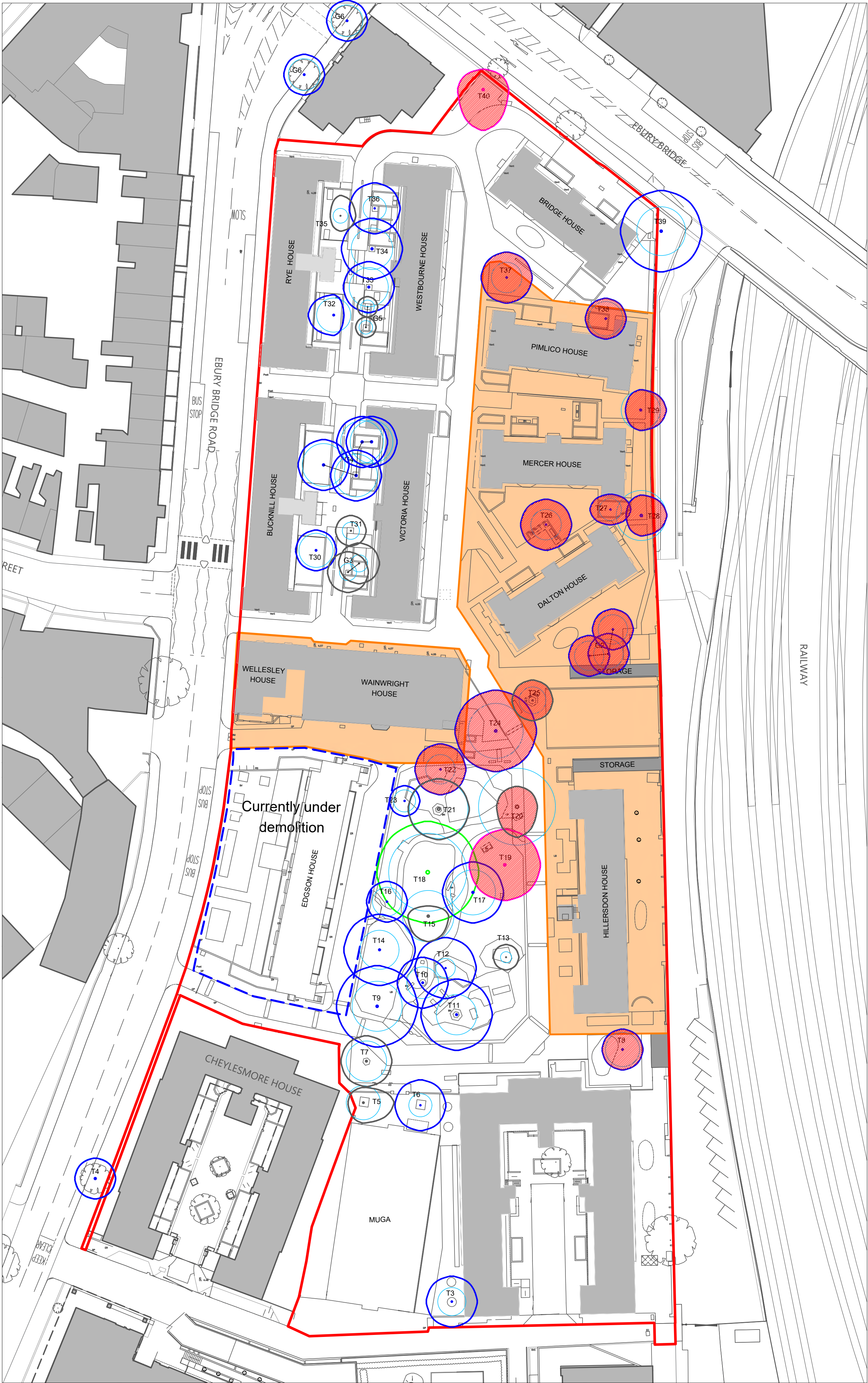
Figure
Impacts Plan

Scale at A4
1:1,455
Role

Suitability
Final

Arup Job No	257461-95	Rev	F1
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Name
Figure D



KEY:
SITE PARAMETER

- EXTENT OF EBURY BRIDGE ESTATE
- AREA PROPOSED FOR DEMOLITION AS PART OF PRIOR APPROVAL (0.54ha)

TREES

- For removal as part of Prior Approval for Demolition
- Category A
Trees of high quality
- Category B
Trees of moderate quality
- Category C
Trees of low quality
- Category U
- RPA using formula in accordance with BS5837:2012

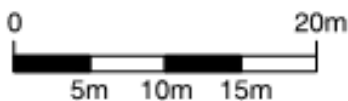
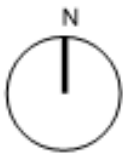
Figure
Impacts Plan - Tree Removal

Name
Figure D

standard notes

1. Do not scale this drawing.
2. All dimensions must be checked on site and any discrepancies verified with the architect.
3. Unless shown otherwise, all dimensions are to structural surfaces.

THIS IS NOT A CONSTRUCTION DRAWING, IT IS UNSUITABLE FOR THE PURPOSE OF CONSTRUCTION AND MUST ON NO ACCOUNT BE USED AS SUCH.



revisions

P1 00.00.00 first issue

Ebury Public Realm Westminster

date 28/08/19 client Westminster City Council

scale 1:500@A1 drawing Demolition prior approval tree removal plan

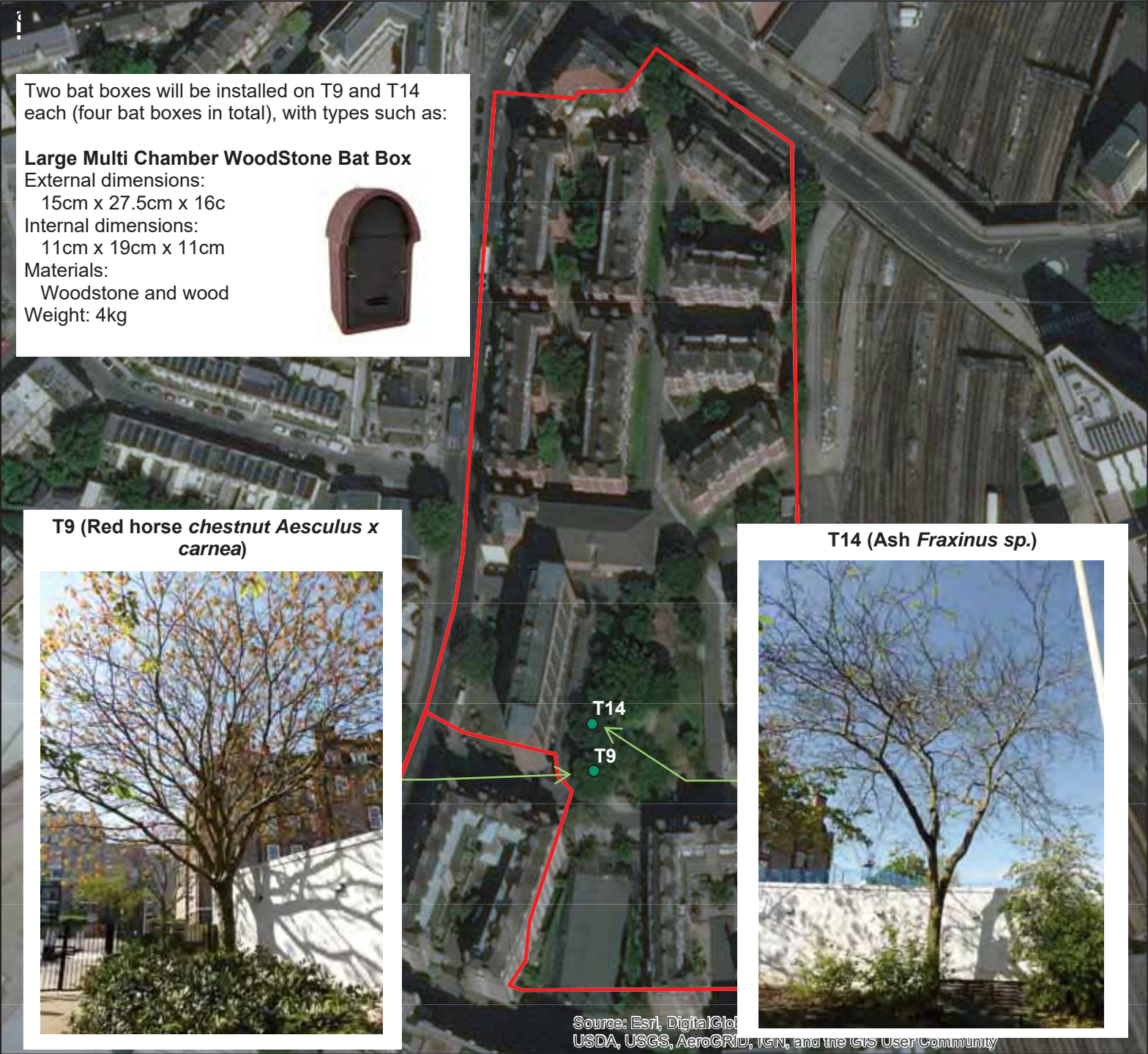
drawn GT checked AB drawing number 3616_L_009 rev P1

File.location

Levitt Bernstein
Thane Studios - Thane Villas 2-4
London
N7 7PA

t: 020 7275 7676
f: 020 7275 9348
w: levittbernstein.co.uk
e: post@levittbernstein.co.uk

Levitt Bernstein



Two bat boxes will be installed on T9 and T14 each (four bat boxes in total), with types such as:

Large Multi Chamber WoodStone Bat Box

External dimensions:

15cm x 27.5cm x 16c

Internal dimensions:

11cm x 19cm x 11cm

Materials:

Woodstone and wood

Weight: 4kg



T9 (Red horse chestnut *Aesculus x carnea*)



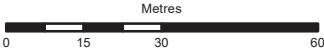
T14 (Ash *Fraxinus sp.*)



Legend

Site boundary

Trees with two bat boxes



F1	2020-04-24	DT	GT	
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www.arup.com

Client

John F Hunt Ltd

Project Title

Ebury Bridge Renewal

Figure

Specifications for Mitigation and Compensation - Existing Landscape

Scale at A4

1:1,455

Role

Suitability

Final

Arup Job No
257461-95

Rev
F1

Name
Figure E3

Source: Esri, DigitalGlobe, GeoEye, IGN, Aerio, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Six bat boxes will be integrated into the new building facades as part of the proposed development (consent pending), with types such as:

Habibat 001 Bat Box Bespoke Facing

Dimensions:

215 mm wide x
440 mm high x
102 mm deep

Material:

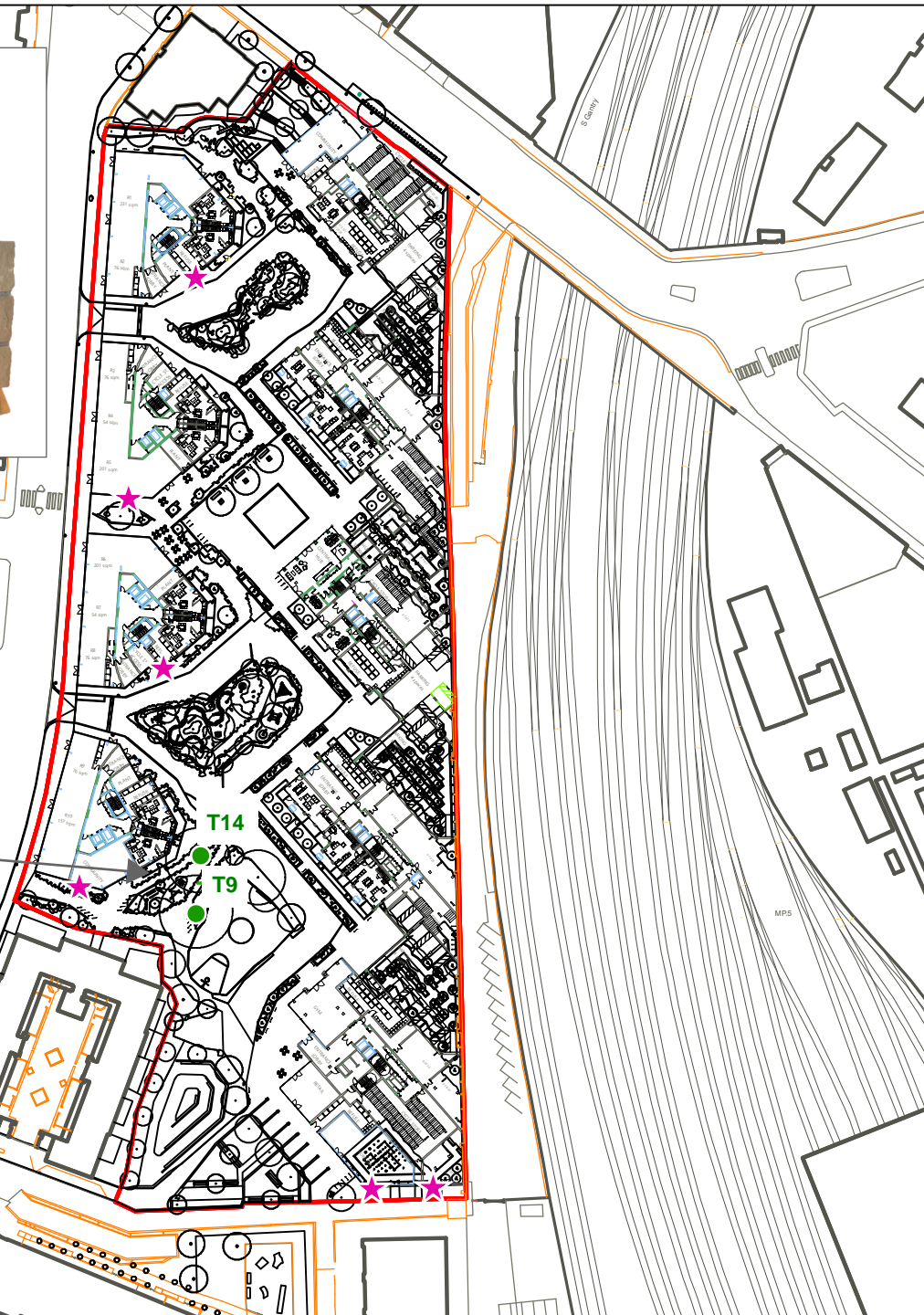
Concrete plus facing product

Weight:

Approximately 7 kg



Two bat boxes will be installed as part of this licence application on T9 and T14 each (four bat boxes in total), with types such as Large Multi Chamber WoodStone Bat Box.

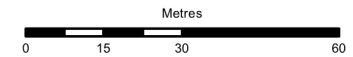


Legend

□ Site boundary

● Trees with two bat boxes

★ Bat boxes to be integrated into the new building facades as part of the proposed development (consent pending)



F1	2020-04-28	DT	GT	
Rev	Date	By	Chkd	Appd

Coordinate System: British National Grid

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client

John F Hunt Ltd

Project Title

Ebury Bridge Renewal

Figure
Specifications for Mitigation and Compensation - Proposed Development Landscape

Scale at A4

1:1,455

Role

Suitability

Final

Arup Job No

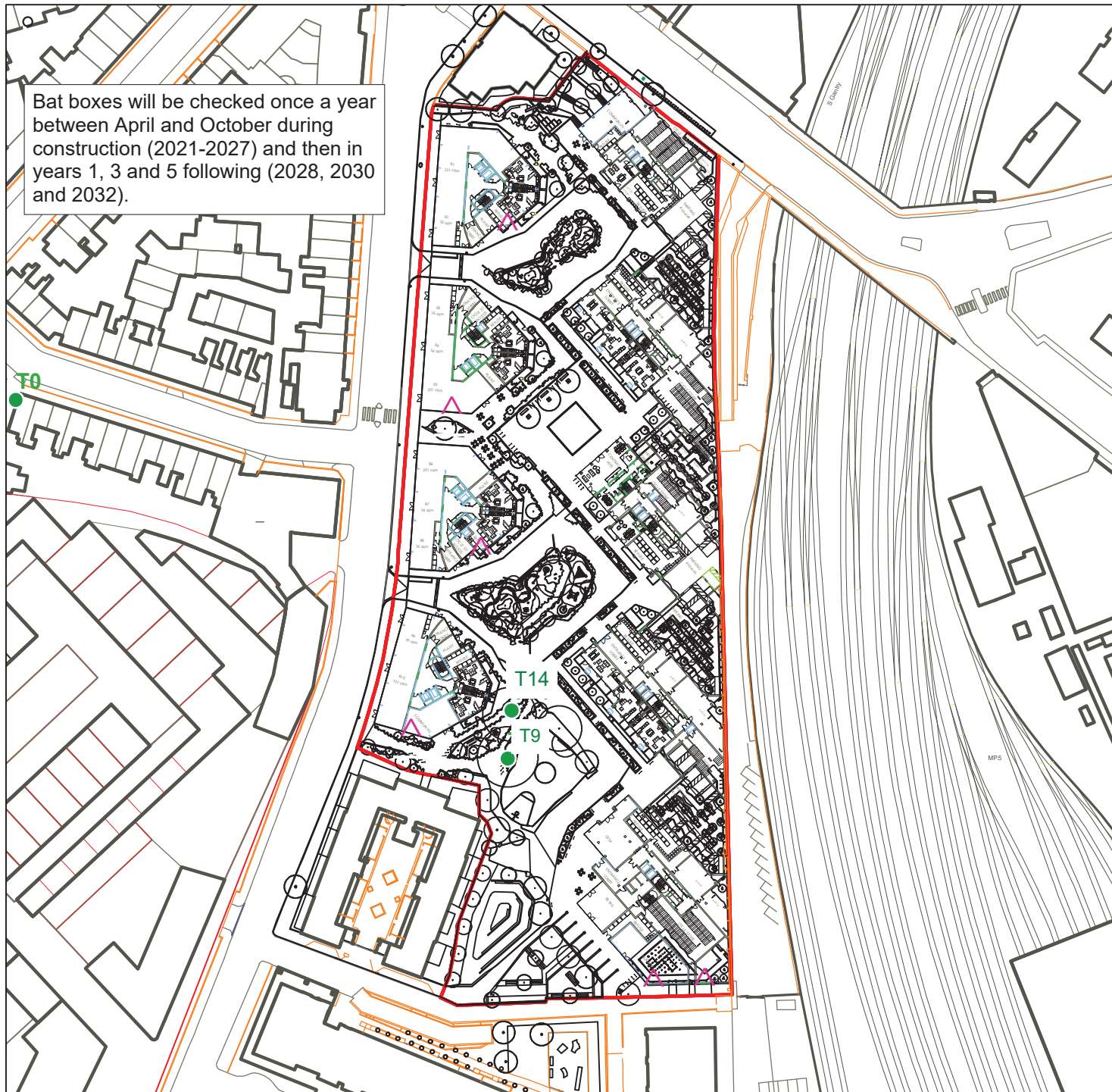
257461-95

Rev

F1

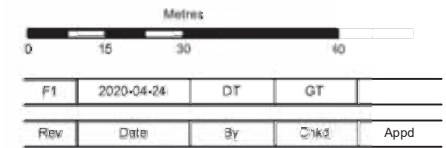
Name

Figure E3 supplementary information



Legend

- Site boundary
- Trees with two bat boxes
- ★ Bat boxes integrated into the building facades



Coordinate System: British National Grid

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www.arup.com

Client

John F Hunt Ltd

Project Title

Ebury Bridge Renewal

Figure

Monitoring, Management and Maintenance

Scale at A4

1:1,455

Role

Suitability

Final

Arup Job No

257461-95

Rev

F1

Name

Figure E4

European Protected Species Mitigation Licensing - Reasoned Statement for the purpose of Imperative Reasons of Overriding Public Interest

The information provided in this form will be used by Natural England to determine whether the proposed activity affecting the European Protected Species meets the requirements of Regulation 53(2)(e) and 53(9)(a) within The Conservation of Habitats and Species Regulations 2010 (as amended). These are known as the '**purpose**' and '**no satisfactory alternatives**' tests.

This form, for the purpose of Imperative Reasons of Overriding Public Interest, only needs to be completed if your application proposal is **not** covered by one the scenarios and categories listed [on GOV.UK](https://www.gov.uk).

Important Note: Detailed information on the proposal is required to demonstrate that it will meet the tests set out under the Regulations. If you encounter difficulty answering the questions or providing the evidence required, it may suggest that your proposal is insufficiently advanced to satisfy the licensing tests. In that case, you should consider delaying your application until this information is available.

Please read the following and complete:

- **Section A: Purpose test**
"Imperative reasons of overriding public interest" (IROPI) including those of a social or economic nature and beneficial consequences of primary importance for the environment"
- **Section B: No Satisfactory Alternative test**

The tests are applied proportionately, so the strength of the evidence required to meet each will need to be sufficient to justify the impact upon the protected species (see guidance for further information). Where the supporting evidence upon which your reasoning is based consists of lengthy documents, please do not submit these in their entirety as this will delay your application if we need to go through them to find the relevant extracts. You need to provide clear, concise information for us to be able to meet the licensing tests. Please note that your application is likely to be rejected in cases where the supporting evidence has not been clearly referenced.

Section A: Purpose Test

A1 Please select against all of the following below which apply to your proposal. You are asked to indicate against those that apply whether the projected benefits are primary or secondary or not applicable to your proposal.

Please note: A primary benefit is considered to be the key social, economic or environmental benefit brought about from the proposal. A secondary benefit is considered to be an additional benefit, but not the main reason for the proposal. There may be more than one secondary benefit but supporting evidence should be provided in Section A2 where applicable, for each benefit selected.

Does your proposal:			
Provide housing in an area where shortfalls have been clearly identified?	<input checked="" type="checkbox"/> Primary benefit	<input type="checkbox"/> Secondary benefit	<input type="checkbox"/> N/A
Create, repair or enhance essential infrastructure at a local, regional or national level?	<input type="checkbox"/> Primary benefit	<input type="checkbox"/> Secondary benefit	<input checked="" type="checkbox"/> N/A
Provide care facilities or another essential public service in an area where it is known to be required?	<input type="checkbox"/> Primary benefit	<input type="checkbox"/> Secondary benefit	<input checked="" type="checkbox"/> N/A
Address another clearly identified social, religious or cultural need?	<input type="checkbox"/> Primary benefit	<input checked="" type="checkbox"/> Secondary benefit	<input type="checkbox"/> N/A
Create long term employment opportunities in an area of high unemployment?	<input type="checkbox"/> Primary benefit	<input type="checkbox"/> Secondary benefit	<input checked="" type="checkbox"/> N/A
Deliver other economic benefits or otherwise contribute in some way to the wider economy?	<input type="checkbox"/> Primary benefit	<input checked="" type="checkbox"/> Secondary benefit	<input type="checkbox"/> N/A
Contribute to addressing problems associated with climate change or promote sustainable energy use	<input type="checkbox"/> Primary benefit	<input type="checkbox"/> Secondary benefit	<input checked="" type="checkbox"/> N/A
Conserve a place of environmental interest?	<input type="checkbox"/> Primary benefit	<input type="checkbox"/> Secondary benefit	<input checked="" type="checkbox"/> N/A
Provide alternative sources of energy?	<input type="checkbox"/> Primary benefit	<input type="checkbox"/> Secondary benefit	<input checked="" type="checkbox"/> N/A
Deliver other benefits from those specified above?	<input type="checkbox"/> Primary benefit	<input type="checkbox"/> Secondary benefit	<input checked="" type="checkbox"/> N/A
If 'Other benefits' is selected, please provide details here:			

A2 In relation to the primary and secondary benefits identified in A1, to help demonstrate the need for the proposal, please provide the evidence and details for all the benefits ticked above.

Important note: Reference the supporting evidence upon which your reasoning is based and include the relevant extracts (please do not send in documents with no indication where the evidence being referred to is). This evidence must link back to the tick boxes selected above. Failure to do so will lead to us having to come back to you for further information.

Supporting evidence can usefully include some or more of the following: Local planning policies and plans, planning permission, policy documents, specialist reports, feasibility studies, extracts from relevant legislation, photographs, media articles or related correspondence. Where applicable, please ensure that planning officer or committee reports and design and access statements are included as supporting evidence.

A2 (a) (i) Please provide full details of the proposal in the box below.

The Proposed Scheme comprises the regeneration of the Ebury Bridge Estate, centred at OS grid reference TQ285783. The existing Estate comprises 13 residential blocks (ranging between three and nine storeys), many of which were built in the 1930s. They are currently leased by Westminster City Council as social rent tenancies or in private leasehold. Additionally, two blocks accommodate a total of 14 ground floor commercial units.

The site is located in Pimlico, within the City of Westminster. It is bound by Ebury Bridge to the north, major railway lines to the east leading to Victoria Station, access roads to the south, and Ebury Bridge Road to the west. A major redevelopment at Chelsea Barracks is located to the south west. Directly to the south, north west and north of the site are further residential and retail units. The River Thames runs west to east approximately 300m south of the site.

The Proposed Scheme proposes the phased demolition and replacement of all 13 blocks (containing 336 residential units) with 9 new blocks (containing 737 residential units). 50% of the new units would be affordable tenures, either for social rent or for intermediate rent or ownership. All existing tenants would be temporarily rehoused during the construction process, and given the opportunity to take up a lease in the new development.

Buildings would be up to 19 storeys or c. 65 metres. The five tallest buildings would be located along the eastern edge of the site, adjacent to the railway.

In replacing the existing 846 sqm of A1 retail floorspace, the development would also provide 3,000 sqm of non-residential land uses including A Use Classes (including shops and cafés); B1 Business units; and D1/ D2 uses (including community and leisure uses). The Proposed Scheme will also incorporate open space including play areas.

Additionally, the Proposed Scheme would remove 43 trees, including 13 individual trees and one tree group as part of Phase 1 and Phase 1A demolition (namely, Category B, C and U trees) (Ref 1). These losses would be compensated by extensive tree planting and urban greening (Ref 1).

As per drawing no. SK-0020, the proposed demolition is split into phases as follows:

- Pre-Phase 1: Edgson House (outlined with blue dashed line);
- Phase 1: Wellesley House, Wainright House, Dalton House and Hillersdon House;
- Phase 1A: Pimlico House and Mercer House;
- Phase 2: Bucknill House, Victoria House, Rye House, Westbourne House, Bridge House and Doneraile House (Ref 2).

The Pre-Phase 1 demolition has been granted planning permission (LPA ref: 18/08372/COFUL) (Ref 3A). Under a subsequent 2019 application (LPA ref: 19/05038/COFUL), permission was granted for community 'meanwhile' uses (Ref 3B). This includes temporary two storey building containing:

community space (Class D1), a café (Class A3) and workspace/ retail units (Class B1 and/or Class A1) (Ref 3B). Works have commenced on site for this element of the Proposed Scheme.

Phase 1 and 1A demolition has been granted permission by prior approval (LPA ref: 19/06951/APAD) (Ref 4). Works are programmed to take place in May 2020 to January 2021, subject to approval of this licence (works impacting roosting bats are not programmed to take place until June 2020).

Phase 2 demolition is programmed to commence in 2023, subject to the granting of planning permission. For clarity, this Reasoned Statement concerns only Phase 1 and Phase 1A of the proposed demolition works.

A2 (a) (ii) Explain why your proposal is considered to be imperative (essential).

For example, if your development proposal is for a housing development reference the local housing need as set out in the area plan and explain how your proposal contributes to meeting this need or how the requirement for the proposed new public service, care facility or infrastructure project was identified.

Firstly, the proposed demolition works are essential to the delivery of a major estate regeneration initiative that will help meet the City of Westminster's development needs and priorities.

In setting out Westminster's Spatial Strategy, the draft Westminster City Plan (WCP) Policy 1, Part B signifies the importance of the Ebury Bridge Estate Housing Renewal Area in delivering the Borough's growth (Ref 5). The site is also in a pivotal position adjacent to the Victoria Opportunity Area, which is designated for regeneration in the adopted London Plan (Ref 6). As stated in the draft Westminster City Plan, the renewal of Ebury Bridge will create a "vitality that will resonate throughout the city" (Ref 7).

Ebury Bridge Estate is identified as a Spatial Development Priority in draft WCP Policy 6 (Ref 8). This means that the Estate has been identified to deliver strategic housing need, amongst other uses, for the wider benefit of the Borough including: approx. 750 new high quality homes; enhanced public realm and green infrastructure; and improvements to Ebury Bridge Local Centre in the form of new retail and community uses (Ref 8).

Ebury's contribution of new homes would be significant in meeting the housing needs of both the City of Westminster and the Greater London area. The draft London Plan has set the Westminster housing target to 985 new homes per year, equating to the need for a net completion of 9,850 homes over 10 years (Ref 9). This reinforces the need to genuinely optimise existing previously developed land across the city as a whole.

Furthermore, draft WCP Policy 8 sets a higher housing target over the 21 year Plan period than that set for Westminster in the draft London Plan over the same period (Ref 10). Specifically, Policy 8 states that the number of new homes in Westminster will exceed 22,222 over the 21 year Plan period (Ref 10). Draft WCP policy 8 also requires housing delivery to be "stepped up" over the first 10 years of the plan so that 1,495 new homes are delivered each year (Ref 10), rather than the 985 units proposed in the draft London Plan (Ref 9). This is to be done, in part, through optimising site densities in Housing Renewal Areas (such as Ebury Bridge Estate) and through planning positively for tall buildings in appropriate locations (Ref 10).

Secondly, for the benefit of the existing Council tenants, the need for the regeneration of Ebury Bridge Estate was first identified in 2010 in Westminster's Housing Renewal Strategy (Ref 11). By renewing the estate, draft WCP Policy 6 highlights that this will allow ongoing issues to be addressed including: current overcrowding; ageing housing stock and public realm (Ref 8).

The benefits of estate regeneration are reinforced by National Planning Policy Framework Paragraph 93 (Ref 12). Furthermore, the Mayor of London's Good Practice Guide to Estate Regeneration emphasizes

that the enhancement of existing housing estates can open up access to a full range of better quality housing of all tenures as well as improving access to employment and community facilities (Ref 13).

The Proposed Scheme will substantially enhance and update the quality of housing. It will also more than double the number of residential units on site (from 336 to 737) and so will give rise to a net 51% increase in affordable residential units. This includes replacement affordable housing for existing tenants, who will all be offered a full right of return in accordance with the Mayor's Good Practice Guide to Estate Regeneration (Ref 14).

Thirdly, the proposed approach to demolish and replace the existing buildings on site has been identified by an iterative masterplan process, undertaken by Westminster City Council. By undertaking demolition, the density of development can be significantly increased and allow the Ebury Bridge Estate to achieve each of the following:

- Make a significant contribution to addressing the affordable and market housing needs at a Borough and London level;
- Provide existing tenants with an improved quality of life and accommodation; and
- Ensure the viability of the development.

Please provide details of supporting evidence.

Provide clear referencing such as page numbers and paragraphs of specific documents so these can easily be cross-referenced. To help with our assessment, please only provide the relevant extracts that help to demonstrate the reasoning given above rather than including lengthy documents in their entirety. Please do not provide website links to separate documentation, unless you identify where exactly in the linked document or web page the evidence referred to is located (our preference is for you to extract the evidence and copy it below, referencing where it has come from).

As referenced in text at A2 (a)(i) and A2 (a)(ii):

Ref 1. Demolition Prior Approval Notification Report - Issued 29 August 2019

Ref 2. SK-0020 Rev D (Demolition Phasing Plan) - Issued 23 May 2019

Ref 3A. 18/08372/COFUL (Decision Notice for Pre-Phase 1 demolition) - Issued 7 January 2019

Ref 3B. 19/05038/COFUL (Decision Notice for Pre-Phase 1 meanwhile use) - Issued 17 September 2019

Ref 4. 19/06951/APAD (Decision Notice for Phases 1 and 1A demolition) - Issued 10 October 2019

Ref 5. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p30. London: City of Westminster. Available from:
https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

Ref 6. Greater London Authority (2020) Opportunity Areas Map [online]. London: GLA. Available from:
www.london.gov.uk/what-we-do/planning/implementing-london-plan/opportunity-areas/opportunity-areas-map-0 [Accessed 17 April 2020]

Ref 7. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p23. London: City of Westminster. Available from:
https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

Ref 8. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p46, p48 - p50. London: City of Westminster. Available from:

https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

Ref 9. Greater London Authority (Dec 2019) The London Plan Intend to Publish [online], p177. London: GLA. Available from: https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf [Accessed 17 April 2020]

Ref 10. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p54. London: City of Westminster. Available from: https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

Ref 11. City of Westminster Council (2010) Westminster Housing Renewal Strategy, p27. London: City of Westminster. Available from: http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf [Accessed 17 April 2020]

Ref 12. Ministry of Housing, Communities & Local Government (2019) National Planning Policy Framework, p27. London: MHCLG. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf [Accessed 17 April 2020]

Ref 13. Greater London Authority (2018) Better Homes for Local People - The Mayor's Good Practice Guide to Estate Regeneration, p4. London: GLA. Available from: <https://www.london.gov.uk/sites/default/files/better-homes-for-local-people-the-mayors-good-practice-guide-to-estate-regeneration.pdf> [Accessed 17 April 2020]

Ref 14. Greater London Authority (2018) Better Homes for Local People - The Mayor's Good Practice Guide to Estate Regeneration, p7. London: GLA. Available from: <https://www.london.gov.uk/sites/default/files/better-homes-for-local-people-the-mayors-good-practice-guide-to-estate-regeneration.pdf> [Accessed 17 April 2020]

Please confirm that relevant extract/s from supporting evidence to verify the above have been included

Yes ☒ No ☐

A2 (b) Explain why the benefits of your proposal override any harm to the protected species.

The benefit/s arising from the proposal must outweigh the harm (or risk of harm) to the protected species. Generally this means long-term public benefits rather than short term benefits (ie creation of permanent employment opportunities rather than temporary employment or creation of infrastructure that helps to provide long-term solutions to clearly identified national problems associated with energy demands).

The proposed demolition would enable the delivery of substantial net gains for sustainable development that would override any harm to protected species on site.

The Proposed Scheme would achieve significant public benefits by rehousing existing Council tenants from overcrowded and outdated accommodation to new high quality, affordable homes (Ref 8). They would also be provided with a wider range of essential amenities including retail units, community facilities and outdoor communal space.

Over and above the replacement units, the Proposed Scheme would also provide 170 affordable housing units for either social rent or intermediate rent/ ownership. In addition, there would be 369 market housing units. As evidenced at A2 (a) (ii), the delivery of this substantial quantum of housing would make an essential contribution to housing need at a Borough and London level (Refs 9 & 10).

Units within the Proposed Scheme will also be designed to be accessible and adaptable, thereby ensuring their usability in the long term. 90% of new residential units will be designed to meet the standards contained within Building Regulations Approved Document M4(2): Accessible and adaptable dwellings and 10% will meet M4(3): Wheelchair user dwellings (Ref 15).

The Proposed Scheme also aims to address climate change impacts through the integration of adaption measures. These measures include:

- At least a 35% reduction in regulated on-site carbon dioxide emissions (above the Part L 2013 baseline of the Building Regulations), with the residential element making a carbon offset payment to achieve Zero Carbon (i.e. a 100% reduction in regulated carbon dioxide) (Ref 16).
- Interventions to ensure a maximum daily water usage of 105 litres, per person per day, with drought resistant planting prioritised within the landscaping to mitigate the need for external irrigation.
- Sustainable Urban Drainage Systems, both across the block roof gardens and public square. This will help to attenuate surface water drainage whilst encouraging biodiversity.
- Significant compensatory tree planting and urban greening.
- Encouraging the use of sustainable transport modes, given the site's highly accessible location. The development will also be car free, with sufficient provision only for disabled persons and motorcycle parking. Car parking spaces will be equipped with active or passive electric car charging points. A proportionate number of cycle parking spaces will also be provided.
- In terms of construction practises, the site will be registered with the Considerate Constructors Code of Practice whereby measures to reduce construction site impacts and waste will be implemented.

The Bat Report for the Proposed Scheme (Arup, 2019) identifies the potential presence of day roosts for low numbers of male or non-breeding female common and soprano pipistrelle bats within a number of the houses (Bridge, Dalton, Hillersden and Rye [and Pimlico and Westbourne]) over the summer period (Ref 18). Three of these buildings (Pimlico, Hillersden and Dalton) are due to be demolished in Phase 1 and Phase 1A, alongside Wellesley and Mercer. The latter two also provide potential roosting features.

The benefits of the Proposed Scheme will outweigh the loss of the roosts of small/or single numbers of common bat species (common pipistrelle) of local/parish value. In the long term, with the outlined mitigation implemented in full, the conservation status of common pipistrelle and soprano pipistrelle bats will not be adversely affected within the local area.

Please provide details of supporting evidence as explained in A2 above.



As referenced in text at A2 (b):

Ref 8. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p46, p48 - p50. London: City of Westminster. Available from: https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

Ref 9. Greater London Authority (Dec 2019) The London Plan Intend to Publish [online], p177. London: GLA. Available from: https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf [Accessed 17 April 2020]

Ref 10. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p54. London: City of Westminster. Available from: https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

Ref 15. HM Government (2015) Approved Document M: Access to and use of buildings, Volume 1: Dwellings. London: HM Government. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf [Accessed 17 April 2020]

Ref 16. Greater London Authority (2018) Energy Assessment Guidance. London: GLA. Available from: https://www.london.gov.uk/sites/default/files/energy_assessment_guidance_2018.pdf [Accessed 17 April 2020]

Ref 18. Arup (2019) Ebury Bridge Estate Bat Report, p14.

Please confirm that relevant extract/s from supporting evidence to verify the above have been included

Yes ☒ No ☐

A3 There must be a Public Interest. You need to demonstrate that your proposal will deliver a public benefit rather than a solely private interest.

Note: Planning consent (or its equivalent) is considered evidence of public interest so please ensure to reference here but only include details in the application form.

A3 (a) Indicate the scale of these benefits:

Local ☒ Regional ☐ National ☐

A3 (b) Where possible, explain the scale of the benefits that will be achieved from your proposal, in quantifiable terms, as indicated above.

For example, this could be the number of new houses provided in proportion to the identified need at a local and regional scale; the number of long term employment opportunities that will be created at a local level; the level of reduced Co2 emissions at an 'X' level.

The Proposed Scheme would:

- Deliver more than double the number of existing residential units on site, by increasing the total quantum from 336 to 737 homes.
- Result in a significant contribution to meeting the housing needs of both the Greater London area and the City of Westminster. The draft London Plan has calculated the Westminster housing target as 985 homes per year (Ref 9); the draft Westminster Plan considers that housing delivery should be "stepped up" even further over the first 10 years of the plan so that 1,495 new homes are delivered each year (Ref 10).
- Replace all 198 existing social rent tenancy units, like-for-like. This will allow current tenants to be offered a full right of return in accordance with the Mayor's Good Practice Guide to Estate Regeneration (Ref 14).
- Provide 170 additional affordable housing units for either social rent or intermediate rent/ ownership, over and above the replacement units.
- Achieve an overall 51% increase in affordable housing units available on site.
- Replace the existing 846 sqm of A1 retail floorspace with 3,000 sqm of non-residential land uses including A Use Classes (including shops and cafés); B1 Business units; and D1/ D2 uses (including community and leisure uses). The Proposed Scheme will also incorporate open space including play areas. This addresses the priority improvements to Ebury Bridge Estate and Local Centre identified in draft Westminster City Plan Policy 6 (Ref 8).

A3 (c) Please provide details of supporting evidence to verify the above as explained in A2 above

As referenced in text at A3 (b):

Ref 8. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p46, p48 - p50. London: City of Westminster. Available from: https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

Ref 9. Greater London Authority (Dec 2019) The London Plan Intend to Publish [online], p177. London: GLA. Available from: https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf [Accessed 17 April 2020]

Ref 10. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p54. London: City of Westminster. Available from: https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

Ref 14. Greater London Authority (2018) Better Homes for Local People - The Mayor's Good Practice Guide to Estate Regeneration, p7. London: GLA. Available from: <https://www.london.gov.uk/sites/default/files/better-homes-for-local-people-the-mayors-good-practice-guide-to-estate-regeneration.pdf> [Accessed 17 April 2020]

Please confirm that relevant extract/s from supporting evidence to verify the above have been included

Yes ☒ No ☐

SECTION B: No Satisfactory Alternative Test

Please explain why there is no satisfactory alternative to your proposal.

A “satisfactory alternative” is a different way of achieving the objective of the activity (ie meeting your need) which has a *less negative impact on the protected species*. If there is a less damaging satisfactory alternative available that is feasible, then legally, a licence cannot be granted.

You are expected to have considered all reasonable alternative solutions when developing your proposal(s) and to have suitable grounds (and evidence) for discounting each against the proposed solution to meet the need. There are technical and non-technical elements to consider for this test and this part of your application will consider the non-technical elements – focussing on delivering the need. Alternatives can include different locations, routes, designs and timings. The Method Statement focusses on the technical elements of this test – ie reducing the impact on the species (see ‘Important Advice’ below).

Important Advice: Please note that alternative mitigation (including timing of licensable works) and compensation solutions are considered as part of the Favourable Conservation Status test and should be included in the relevant species Method Statement submitted with your application and not here.

B1 (a) Firstly, please explain why the current situation (ie the status quo) isn’t acceptable or feasible.

The current situation is not acceptable for occupiers of Ebury Bridge Estate. The unacceptability of existing accommodation is identified in the draft WCP policy 6. The policy highlights that the ageing building fabric and outdated public realm means that the standard of living for occupiers is poor (Ref 8). This is exacerbated by continuing issues of overcrowding (Ref 8). As 58.9% of occupiers are social rent tenants, they are unlikely to have choice over their place of residence and so the onus to improve residents' quality of life lies with Westminster City Council.

The degrading building fabric also continues to incur unacceptable maintenance costs to Westminster City Council.

Furthermore, given the substantial annual need for new housing identified by both the draft Westminster City Plan and the draft London Plan (Refs 9 & 10), it would be unacceptable not to take up the opportunity to optimise a site where there is additional capacity for intensification, which can be carefully managed by Westminster City Council (as the land owner and developer). In Westminster, although housing supply has traditionally come forward through windfall sites, the draft WCP sets out the Council's intention to take a more proactive approach in planning for growth (Ref 19).

B1 (b) Details of supporting evidence.

Provide clear referencing such as page numbers and paragraphs of specific documents so these can easily be cross-referenced. To help with our assessment, please only provide the relevant extracts that help to demonstrate the reasoning given above rather than including lengthy documents in their entirety. Please do not provide website links to separate documentation, unless you identify where exactly in the linked document or web page the evidence referred to is located (our preference is for you to extract the evidence and copy it below, referencing where it has come from).

As referenced in text at B1 (a):

Ref 8. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p46, p48 - p50. London: City of Westminster. Available from: https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

Ref 9. Greater London Authority (Dec 2019) The London Plan Intend to Publish [online], p177. London: GLA. Available from: https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf [Accessed 17 April 2020]

Ref 10. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p54. London: City of Westminster. Available from: https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

Ref 19. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p56. London: City of Westminster. Available from: https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]

B1 (c) Confirm relevant extract(s) from supporting evidence is included to verify the above.

Yes ☒ No ☐

Please use the tables below to describe each alternative considered.

Please use a separate line for each and tick the relevant reason(s) why it was dismissed. It is important to explain why each alternative was judged to be unsatisfactory or unfeasible to meet the need for the proposal put forward in your application and to provide concise supporting evidence as appropriate (*Please insert additional rows as required*).

B2 (a) Set out <u>what</u> alternative locations and/or routes were considered and indicate how and why they were not acceptable.	Not applicable to situation	Won't deliver need	Not feasible	Greater impact on species
Location or route 1:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If you have ticked 'Not applicable to situation', please explain why here, otherwise please complete this table as appropriate: As the need for housing renewal is specific to the Ebury Bridge Estate, it is not relevant to consider alternative locations for the development.				
Describe the location or route considered				
Clearly set out how and why the alternative location/route was discounted.				
Location or route 2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe the location or route considered				
Clearly set out how and why the alternative location/route was discounted.				

Location or route 3:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe the location or route considered				
Clearly set out how and why the alternative location/route was discounted.				
Location or route 4:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe the location or route considered				
Clearly set out how and why the alternative location/route was discounted.				

**Please note: you can add more rows to the table: Right click in the bottom row > Choose Insert > Insert rows below.*

B2 (b) Details of supporting evidence.

Provide clear referencing such as page numbers and paragraphs of specific documents so these can easily be cross-referenced. To help with our assessment, please only provide the relevant extracts that help to demonstrate the reasoning given above rather than including lengthy documents in their entirety. Please do not provide website links to separate documentation, unless you identify where exactly in the linked document or web page the evidence referred to is located (our preference is for you to extract the evidence and copy it below, referencing where it has come from).

<p>The need for housing renewal at Ebury Bridge Estate has been evidenced and set in policy, as demonstrated in the following plan document:</p> <p>- Ref 8. City of Westminster Council (2019) City Plan 2019 - 2040 [online], p46, p48 - p50. London: City of Westminster. Available from: https://www.westminster.gov.uk/sites/default/files/core_001_regulation_19_publication_draft_city_plan_2019-2040_wcc_june_2019.pdf [Accessed 17 April 2020]</p> <p>This need is long standing and has been highlighted as a policy priority since 2010, as in the following document:</p> <p>- Ref 11. City of Westminster Council (2010) Westminster Housing Renewal Strategy, p27. London: City of Westminster. Available from: http://transact.westminster.gov.uk/docstores/publications_store/wcc_housing_renewal_report2010_lowres.pdf [Accessed 17 April 2020]</p>
--

B2 (c) Confirm relevant extract(s) from supporting evidence is included to verify the above.

Yes ☒ No ☐

B3 (a) Set out <u>which</u> alternative development scales or designs were considered.	Not applicable to situation	Won't deliver need	Not feasible	Greater impact on species
<p><i>Important note: If new infrastructure is to be created explain why the need cannot be met by expanding existing infrastructure.</i></p>				

Development scale or Design 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If you have ticked 'Not applicable to situation', please explain why here otherwise please complete this table as appropriate:				
Describe the development scale or design considered.	<p>Following a two year public consultation period, Westminster City Council previously submitted a similar proposal in 2014 (LPA ref: 14/01295/COFUL) for the same Ebury Bridge Estate site (Ref 20).</p> <p>The proposal entailed:</p> <ul style="list-style-type: none"> - Demolition of 8 of the 13 existing Ebury Estate buildings and replacement with 6 new blocks (rather than the complete demolition and replacement of all buildings in the current Proposed Scheme). - Refurbishment of the remaining 5 buildings as a subsequent phase (Ref 20). 			
Clearly explain how and why the different development scale or design considered was discounted.	<p>The previous proposal was not implemented partly because it would have made a far lesser contribution to housing need. It would have only:</p> <ul style="list-style-type: none"> - Increased the total quantum of dwellings from 336 to 435 units, approx. 41% fewer units than the current Proposed Scheme. - Provided 108 new social rent tenancy units, approx. 45% fewer of these units than the current Proposed Scheme. - Required 90 social rent tenancy units to await refurbishment. - Provided 47 additional affordable units, approx. 72% fewer units than the current Proposed Scheme (Ref 20). <p>Furthermore, the lesser total quantum of market housing (116 private units, as opposed to 369 private units in the current Proposed Scheme) (Ref 20) rendered the proposal financially unviable for Westminster City Council to deliver.</p> <p>The proposal would also not have established the same quantum of community facilities to meet the needs of Ebury Bridge Local Centre. It would have only increased the existing 846 sqm of A1 retail floorspace and 154 sqm of community space to 1375 sqm of A1, A2 or D1 uses (Ref 20). In comparison, the current Scheme would establish 3,000 sqm of non-residential floorspace including A Use Classes, B1 Business units and D1/ D2 uses.</p>			
Development scale or Design 2:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe the development scale or design considered.				
Clearly explain how and why the different development scale or design considered was discounted.				
Development scale or Design 3:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe the development scale or design considered.				
Clearly explain how and why the different development scale or design considered was discounted.				

Development scale or Design 4:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe the development scale or design considered.				

Clearly explain how and why the different development scale or design considered was discounted.				
--	--	--	--	--

**Please note: you can add more rows to the table: Right click in the bottom row > Choose Insert > Insert rows below.*

B3 (b) Details of supporting evidence.

Provide clear referencing such as page numbers and paragraphs of specific documents so these can easily be cross-referenced. To help with our assessment, please only provide the relevant extracts that help to demonstrate the reasoning given above rather than including lengthy documents in their entirety. Please do not provide website links to separate documentation, unless you identify where exactly in the linked document or web page the evidence referred to is located (our preference is for you to extract the evidence and copy it below, referencing where it has come from).

As referenced in text at B3 (a):
Ref 20. 14/01295/COFUL (Planning Statement for 2014 scheme, pp. 12 - 15) - Issued May 2014

B3 (c) Confirm relevant extract(s) from supporting evidence is included to verify the above.

Yes ☒ No ☐

B4 (a) Other alternative activities, processes or construction methods considered to reduce the impact upon the species	Not applicable to situation	Won't deliver need	Not feasible	Greater impact on species
<i>Important note – detailed timings of licensable works, alternative mitigation and compensation which will reduce the degree of harm are to be considered within the Method Statement and not here.</i>				
Alternative activity, process or method 1:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If you have ticked 'Not applicable to situation', please explain why here otherwise please complete this table as appropriate: The implementation of mitigation measures as described within the Method Statement and Schedule of Works, sensible construction methods with particular regard to protected species, alongside new landscaping, will ensure the reduction of impact upon the species. Post-construction monitoring and aftercare maintenance of the new planting will also ensure long-term benefits.				
Describe the alternative activity, process or method considered.				
Clearly explain why this alternative was discounted.				
Alternative activity, process or method 2:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe the alternative activity, process or method considered.				
Clearly explain why this alternative was discounted.				
Alternative activity, process or method 3:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe the alternative activity, process or method considered.				
Clearly explain why this alternative discounted.				
Alternative activity, process or methods 4:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe the alternative activity, process or method considered.				
Clearly explain why this alternative was discounted.				

**Please note: you can add more rows to the table: Right click in the bottom row > Choose Insert > Insert rows below.*

B4 (b) Details of supporting evidence.

Provide clear referencing such as page numbers and paragraphs of specific documents so these can easily be cross-referenced. To help with our assessment, please only provide the relevant extracts that help to demonstrate the reasoning given above rather than including lengthy documents in their entirety. Please do not provide website links to separate documentation, unless you identify where exactly in the linked document or web page the evidence referred to is located (our preference is for you to extract the evidence and copy it below, referencing where it has come from).

N/A

B4 (c) Confirm relevant extract(s) from supporting evidence is included to verify the above.

Yes ☐ No ☐

John F Hunt Ltd.

Ebury Bridge Estate

Bat Masterplan

Issue

Issue | 29 April 2020

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 274676-00

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ARUP

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Appendices

Appendix A

Demolition Phasing

Appendix B

Existing Habitats

Appendix C

Proposed Scheme

Appendix D

Habitat Compensation

1 Introduction

1.1 Background

Ove Arup and Partners Limited (Arup) was commissioned by John F Hunt Ltd (JF Hunt) to prepare a European Protected Species (EPS) Mitigation licence application to facilitate Phase 1 and 1A demolition works associated with the renewal of Ebury Bridge Estate, Ebury Bridge Road, London, SW1W 8PX ('the site'). Westminster City Council's regeneration team is preparing a Hybrid Outline Application for a mixed-use development at the site (the 'Proposed Scheme').

The 1.85 hectare (ha) site comprises 13 residential blocks (ranging between three and nine storeys), many of which were built in the 1930s. They are currently leased by Westminster City Council as social rent tenancies or in private leasehold. Additionally, two blocks accommodate a total of 14 ground floor commercial units.

This master plan document sets out the various phases of the Proposed Scheme in the view to help assess the overall impacts on the bat population, and the future mitigation across the whole project.

The European Protected Species (EPS) Mitigation licence application associated with this masterplan relates to the loss of roosting habitat for bats associated with demolition Phases 1 and 1A. It is unclear at the current time if Phase 2 demolition will need to be subject to a EPSML. Detailed bat surveys of the Phase 2 buildings will be undertaken in 2022/2023 to determine this.

1.2 Proposed Scheme

The Proposed Scheme comprises the phased demolition and replacement of all 13 blocks (containing 336 residential units) with 9 new blocks (containing 737 residential units). 50% of the new units would be affordable tenures, either for social rent or for intermediate rent or ownership. Buildings would be up to 19 storeys or c. 65 metres. In replacing the existing 846 sqm of A1 retail floorspace, the Proposed Scheme would also provide 3,000 sqm of non-residential land uses including A Use Classes (including shops and cafés); B1 Business units; and D1/D2 uses (including community and leisure uses). The Proposed Scheme will also incorporate open space including play areas.

1.3 Consents and Programme of Works

As shown in the demolition phasing plan in Appendix A1, demolition is split into phases as follows:

- Pre-Phase 1: Edgson house (outlined with blue dashed line);
- Phase 1: Wellesley house, Wainwright house, Dalton house and Hillersdon house;
- Phase 1A: Pimlico house and Mercer house; and

- Phase 2: Bucknill house, Victoria house, Rye house, Westbourne house, Bridge house and Doneraile house.

1.3.1 Pre-Phase 1

The Pre-Phase 1 demolition has been granted planning permission (LPA ref: 18/08372/COFUL). Under a subsequent 2019 application (LPA ref: 19/05038/COFUL), permission was granted for community 'meanwhile' uses. Works have commenced for this element of the scheme.

Meanwhile use includes temporary two storey building containing: community space (Class D1), a café (Class A3) and workspace/ retail units (Class B1 and/or Class A1). Works have commenced on site for this element of the Proposed Scheme. No trees are due for removal to facilitate meanwhile use as shown in Appendix A2.

1.3.2 Phase 1 and 1A Demolition

Phase 1 and 1A demolition has been granted permission by prior approval (LPA ref: 19/06951/APAD). Six buildings (Wellesley, Wainwright, Hillersdon, Dalton, Mercer and Pimlico houses) are due for demolition during Phases 1 and 1A. Approval was granted on the condition that development is carried out within a period of 5 years from the date on which approval was given (October 2019) (Appendix A3).

1.3.3 Phase 2 Demolition and Construction

The Phase 2 demolition of Bucknill house, Victoria house, Rye house, Westbourne house, Bridge house and Doneraile house and three phases of construction forms part of the Hybrid Outline Application, which is due to be submitted to Westminster City Council in the summer of 2020.

1.3.4 Programme

Timescales for the demolition and construction of the Proposed Scheme are shown in Table 1.

Table 1 Demolition and construction programme

Phase	Start Date	Finish Date
Phase 1 and 1A Soft strip and hard demolition	May 2020	January 2021
Phase 1 (detailed area) Construction and fit out	May 2021	July 2023
Phase 2 Soft strip and hard demolition	July 2022	March 2024
Phase 2 Construction and fit out	February 2023	2025

Phase 3 Construction and fit out	April 2024	2027
----------------------------------	------------	------

2 Baseline Conditions

2.1 Habitats

The site is dominated by buildings and hardstanding, with amenity spaces comprising amenity grassland and introduced shrub with scattered trees (see Appendix B1). Existing habitat areas are shown in Table 2.

Table 2 Existing habitat areas

Habitat	Area (approximate ha)
Buildings	0.59
Amenity grassland	0.28
Introduced Shrub	0.13

2.2 Bats

The majority of buildings were considered to have moderate bat roosting potential due to a number of potential roosting features (PRFs) at roof level. The survey results suggest the potential presence of day roosts for low numbers of male or non-breeding female common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus* bats within houses located within Phase 1 and 1A and Phase 2 over the summer period. This type of roost is of low conservation importance:

- Phases 1 and 1A - Dalton and Hillersdon houses support potential common pipistrelle day roosts and Pimlico house supports a potential soprano pipistrelle day roost. Wainwright house was the only house that was assessed to have low potential to support roosting bats and does not form part of the licensable works. Wellesley and Mercer houses have moderate bat roosting potential; and
- Phase 2 - Rye house supports a potential common pipistrelle day roost and Westbourne and Bridge houses support potential soprano pipistrelle day roosts. Doneraile, Bucknill and Victoria houses have moderate potential to support roosting bats.

Given the low levels of activity recorded at the site during the automated survey in late June and early July, the presence of larger maternity roosts is considered unlikely. Low numbers of common and soprano pipistrelle bats may also roost in the lofts during the hibernation period (November to March).

Landscaped areas within the site were also recorded to support foraging and commuting habitat for common pipistrelle bats. The scattered trees have negligible potential to support roosting bats.

3 Impacts

3.1 Phase 1 and 1A Demolition

In the absence of mitigation, Phase 1 and 1A demolition has potential to result in the loss of PRFs for common and soprano pipistrelle, disturbance to bats and a risk of injury/killing during the works. Three potential day roosts will be lost within Dalton (common pipistrelle), Hillersdon (common pipistrelle) and Pimlico (soprano pipistrelle) houses.

Scattered trees proposed for removal are located within the north and east of the site and are shown within Appendix C1. Given the scale of tree removal in the context of the site, this is unlikely to impact bat foraging and commuting corridors and does not have potential to lead to fragmentation.

Night-time lighting during demolition will be limited. There will be bulkhead lights on hoarding to provide navigation across the site. Furthermore, lighting will be required at the start and end of the working day during the autumn and winter months. Given the levels of lighting at the site currently, this is unlikely to disturb foraging and commuting bats. The park will not need to be lit to facilitate demolition works and thus there will be no additional lighting in the vicinity of the proposed bat boxes.

3.2 Proposed Scheme

Without mitigation, Phase 2 demolition has potential to result in the loss of PRFs for common and soprano pipistrelle, disturbance to bats and a risk of injury/killing during the works. Three potential day roosts will be lost within Bridge and Westbourne (common pipistrelle) and Rye houses (soprano pipistrelle).

A further 27 trees are proposed for removal as part of the Hybrid Outline Application. Trees proposed for removal as part of the construction phase are shown within Appendix C2 and are located throughout the site. The scheme will also result in the clearance of amenity grassland and introduced shrub. Vegetation clearance will result in the temporary loss of foraging habitat for bats, as the proposed landscape strategy will compensate for the removal of vegetation and provide an enhancement, as detailed below.

Construction phasing is shown in Appendix C3. Proposed habitats on site (see Appendices C4-6) include green roofs, private amenity space, scattered trees, hedge planting, woodland understorey planting, introduced shrub and rain gardens.

The masterplan uses the historic presence of the Grosvenor Canal as a key design driver and seeks to interpret this landscape feature within the new public realm proposals. The linear path of the former canal extent reflects the desire-line to be supported, running between Ebury Bridge and, ultimately The Thames Path and Grosvenor Road to the south. This channel of space, to be framed by new buildings, emerges as a new sequence of public realm spaces, enhancing connectivity for bats and other wildlife through the site.

Landscaping at ground level will provide scattered trees, areas of grassland, rain gardens and introduced shrub. Approximately 260 new trees will be planted within the site to compensate for the loss of scattered trees. Both native and non-native species have been selected in order to benefit biodiversity and be of a provenance that would tolerate future predicted conditions as a result of climate change. New tree planting will typically have a minimum trunk diameter of 18-20cm.

Biodiverse green roof is proposed on buildings 1-4 with an average substrate depth of 150mm and rainwater harvesting measures to assist with water attenuation. Bird and bat boxes and timber piles for invertebrates will also be provisioned.

The lighting strategy for the Proposed Scheme has only been developed in detail for Phase 1 (relating to the detailed element of the planning application). Lighting fixtures will employ LED technology, which is preferable for bats due to their sharp cut-off, lower intensity, good colour rendition and dimming capability. Lighting along circulatory routes will ensure safe use by pedestrians and vehicles and further emphasis is placed on gateway nodes into the site, residential entrances, changes in level within the landscape and areas of bicycle storage/parking. The scale of fittings such as illuminated bollards and lighting mounted on columns no higher than 5m will help minimise light spill and therefore disturbance to bats. However, as the lighting design has not been developed in detail for Phases 2 and 3, there is potential for lighting to disturb roosting bats associated with the façade-integrated bat boxes and bat boxes on trees.

4 Mitigation and Compensation

Mitigation measures relating to reducing risks of harm to individual bats are not described in this document, because they are specific to the individual development phase and are not influenced by the fact that each phase forms part of a larger development site.

Compensation measures for bats have been designed to ensure that Phase 1 and 1A demolition would not compromise the conservation status of bats in this part of their natural range. Bat boxes will be installed on retained trees to compensate for the loss of roosting habitat associated with Phase 1 and 1A demolition. The long-term security of the bat population is secured as these trees will be retained within the Proposed Scheme. The site is free from future development pressures aside from the Proposed Scheme.

4.1 Phase 1 and 1A Demolition

To provide opportunities for bats to roost at alternative locations to the buildings, bat boxes will be installed prior to Phase 1 and 1A demolition in June 2020 in areas of the site that will remain undisturbed throughout all demolition and construction phases. Four Large Multi Chamber WoodStone Bat Boxes¹ will be installed on retained trees within the park. Two will be located on T9 and two on T14 (see Appendix D1). All bat boxes will be installed at approximately 4m above the ground, avoiding shading of the boxes and providing clear access by bats into the boxes.

4.2 Proposed Scheme

As previously outlined, this licence application pertains to Phase 1 and 1A demolition and therefore no further bat boxes are planned for installation with respect to Phase 2 demolition. The requirement for further compensation would be informed by bat surveys in 2022/2023.

Six bat boxes will be integrated into the facades of buildings 1, 2, 3, 4 and 9 (Appendix D2) during construction Phases 2 and 3. These will comprise Habibat Bat Boxes² or equivalent. The integrated bat boxes are proposed to ensure an enhancement for roosting bats at the site; these features are not relied upon to deliver adequate compensation for impacts associated with Phase 1 and 1A demolition.

There would be no night time working during demolition and construction. The Demolition Management Plan and Construction Environment Management Plan will be developed in consultation with an ecologist to ensure compliance with good practice guidance³. This will also avoid lighting on the bat boxes and minimal lighting in these areas of the site.

¹ <https://www.nhbs.com/large-multi-chamber-woodstone-bat-box>.

² <https://www.nhbs.com/habibat-bat-box-plain-for-rendering>.

³ Bat Conservation Trust and the Institution of Lighting Professionals, (2018); 'Bat Guidance Note 08/18 Bats and artificial lighting in the UK. Bats and the Built Environment series.'

Consultation is ongoing with the architect to integrate appropriate measures within the Design Code to minimise disturbance to bats during the operation of the Proposed Scheme. This will ensure that the lighting design is developed in consultation with an ecologist; that it avoids lighting on the bat boxes and minimises light levels in these areas; and is developed in accordance with current guidance⁴. This will maximise the value of the proposed landscaping for roosting, foraging and commuting bats. The final design would adhere to good practice guidance by reducing skyglow and using warm lighting.

5 Habitat Maintenance and Management Plan

Westminster City Council will be responsible for the implementation of the following plan as the Proposed Scheme is within the ownership of the developer. This plan covers the period 2021 to 2032, throughout construction of the Proposed Scheme and five years following.

This plan is not currently committed to as part of a planning obligation or legal agreement as the Hybrid Outline Planning Application has not yet been submitted. Demolition consent was however granted separately for Phase 1 and 1A demolition on the condition that development commences within five years of October 2019. The Hybrid Outline Planning Application is now due to be submitted in Summer 2020. Accordingly, it is envisaged that there be a clause within the Section 106 Agreement supporting the Hybrid Outline Planning Permission that this plan (in so far as the mitigation proposed sits within the remit of the consented Hybrid Outline Development) be complied with.

5.1 Habitat Maintenance

The management and maintenance of the new public realm spaces should be coordinated to ensure regimes for soft and hard-landscape maintenance can be devised to ensure balance and continuity between objectives for biodiversity, safety, security, cleanliness and effective storm-water management.

Details of the habitat management are currently being finalised but will include an aftercare period of five years with regular monitoring of all planted specimens, ensuring the establishment of new landscape areas and newly planted trees.

5.2 Bat Box Monitoring and Maintenance

The bat boxes will be monitored and maintained annually throughout construction (2021-2027) and in years 1, 3 and 5 following the completion of construction (2028, 2030 and 2032) between April and October, when bats are active. This will ideally take place in April or September-October, which is outside breeding and hibernation periods.

5.2.1 Maintenance

Integrated bat boxes will not require any maintenance. However, any nesting material/detritus would need to be removed from non-integrated boxes, which would also be checked for damage. This will comprise the replacement of any broken/fallen bat boxes as required, carried out by site maintenance staff in consultation with a suitably qualified ecologist. Any vegetation that obscures the boxes would be removed by maintenance staff as necessary.

5.2.2 Monitoring

A licensed bat worker will use an endoscope to check for evidence of bats including scratch marks, droppings, urine stains and actual sightings. Where integrated bat boxes are located too high to inspect with a ladder, an emergence/re-entry survey will be required. This is in accordance with the Bat Mitigation Guidelines⁵.

⁵ Mitchell-Jones, A.J., 2004. Bat Mitigation Guidelines. Available at: <https://webarchive.nationalarchives.gov.uk/20140605171643/http://publications.naturalengland.org.uk/publication/69046?category=31008> (accessed 17/04/2020).

Appendix A

Demolition Phasing

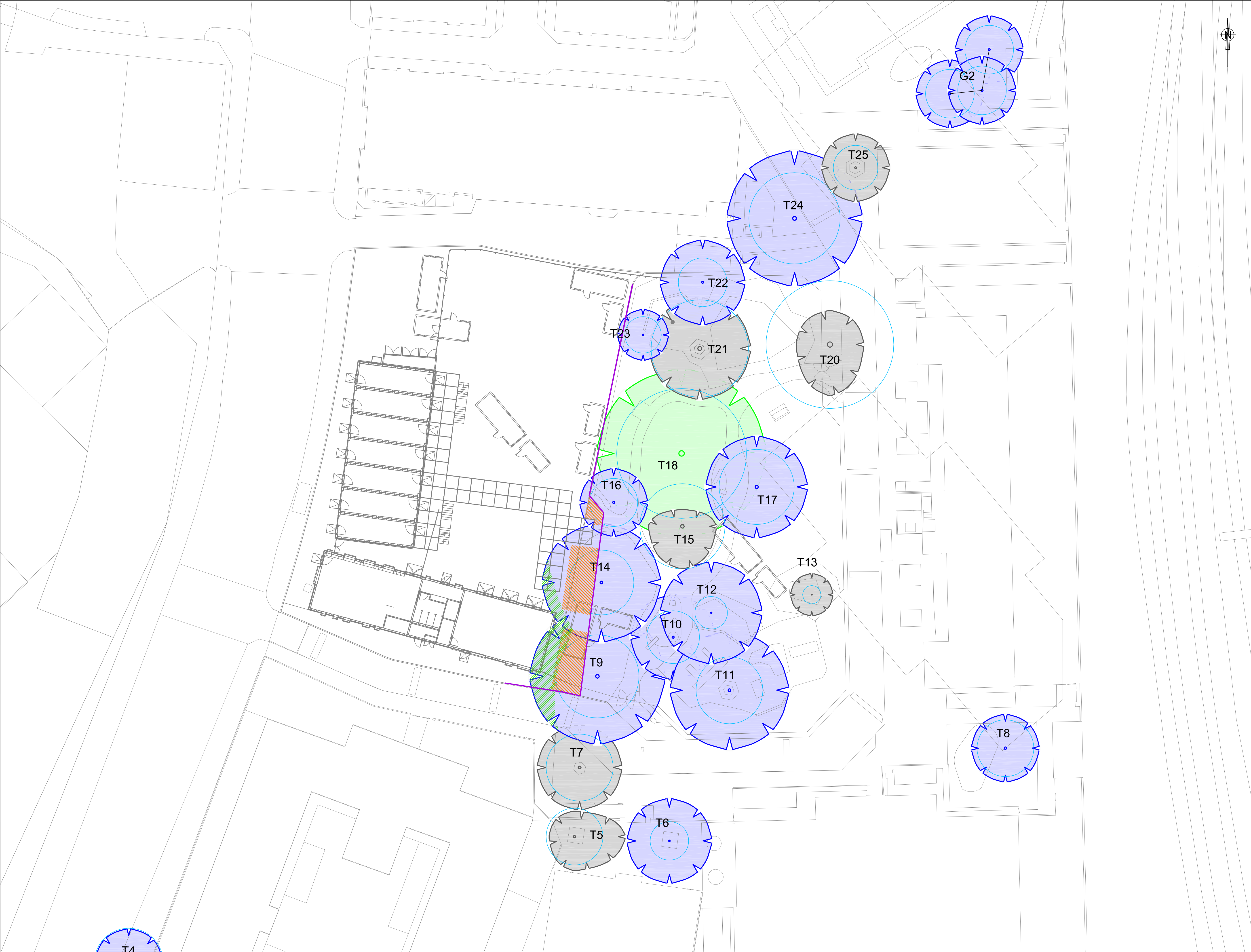
A1 Phase 1 and 1A Demolition Phasing

Sketch Register

Reference: DEMOLITION PHASING



A2 Meanwhile Use Tree Protection



REV	DATE	DESCRIPTION
LEGEND		
	Category A	Trees of high quality
	Category B	Trees of moderate quality
	Category C	Trees of low quality
	RPA using formula in accordance with BS5837:2012	
	Location of Protective Fencing	
	Crown Management	
	Ground protection	

Trees categorised in accordance with BS5837:2012 "Trees in relation to design, demolition and construction – Recommendations"


The original of this drawing was produced in colour – a monochrome copy should not be relied upon

LOCATIONS ARE APPROXIMATE.

PROJECT
EBURY ESTATE, EBURY BRIDGE ROAD, WESTMINSTER, SW1W 8RZ

TITLE
TREE PROTECTION

CLIENT
CITY OF WESTMINSTER



agb Environmental Ltd
Newmarket Business Centre, 341 Exning Road,
Newmarket, CB8 0AT
Tel: 01638 683 228
Email: info@agbenvironmental.co.uk
Web: www.agbenvironmental.co.uk

DATE	17/10/19
SCALE	1:200 @ A1

PROJECT NUMBER . DRAWING NUMBER
P3378.2 . 001 revB

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A3 Demolition Consent



Your ref: Ebury Bridge Estate Prior App...
My ref: 19/06951/APAD

Please reply to:
Tel No:

Amanda Jackson
020 7641 2934

Mr Andrew Lightstone
Arup
Arup
13 Fitzroy Street
London
W1T 4BQ

Development Planning
Westminster City Hall
PO Box 732
Redhill, RH1 9FL

10 October 2019

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990
TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND)
ORDER 2015

The City Council has considered the application under Part 11 of the above Order and APPROVES (CONDITIONALLY) the demolition of the structures referred to in accordance with the submitted documents: The development must be carried out within a period of 5 years from the date on which approval was given.

SCHEDULE

Application No: 19/06951/APAD

Application Date:

Date Received: 06.09.2019

Date Amended: 06.09.2019

Plan Nos: ARUP letter dated 29 August 2019; ARUP Demolition Prior Approval Notification Report dated 29 August 2019; Demolition Plan drawing SK_03_0509 Rev P01;

For information only: Ground Contamination Desk Study and Arboricultural Report and Tree Survey

Address: Ebury Bridge Estate, Ebury Bridge Road, London, SW1W 8PX

Proposal: Notification of intention to demolish Wellesley House, Wainwright House, Dalton House, Hillersdon House, Pimlico House and Mercer House (Prior Approval under Schedule 2, Part 11, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

See next page for conditions/reasons.

Yours faithfully

Deirdra Armsby
Director of Place Shaping and Town Planning

Note - As the requirements of the Building Regulations may affect the design of the proposed development our Building Control team can offer advice and guidance at an early stage. If you would like to take advantage of

this service please contact them on 020 7641 6500 or email districtsurveyors@westminster.gov.uk to arrange a preliminary discussion.

Note - As the requirements of the Building Regulations may impact on the design of the proposed development, our Building Control team can offer advice and guidance at an early stage. If you would like to take advantage of this free service please contact **020 7641 7230** to arrange a preliminary discussion.

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



Condition(s):

- 1 You must carry out a detailed site investigation to find out if the building or land are contaminated with dangerous material, to assess the contamination that is present, and to find out if it could affect human health or the environment. This site investigation must meet the water, ecology and general requirements outlined in 'Contaminated Land Guidance for Developers submitting planning applications' - produced by Westminster City Council in January 2018.

You must apply to us for approval of the following investigation reports. You must apply to us and receive our written approval for phases 1 prior to any above ground demolition works of the relevant demolition phase; for phases 2 and 3 before the start of any ground slab demolition or ground excavation work of the relevant demolition phase; and for phase 4 when the development has been completed but before it is occupied.

Phase 1: Desktop study - full site history and environmental information from the public records.

Phase 2: Site investigation - to assess the contamination and the possible effect it could have on human health, pollution and damage to property.

Phase 3: Remediation strategy - details of this, including maintenance and monitoring to protect human health and prevent pollution.

Phase 4: Validation report - summarises the action you have taken during the development and what action you will take in the future, if appropriate.
(C18AA)

Reason:

To make sure that any contamination under the site is identified and treated so that it does not harm anyone who uses the site in the future. This is as set out in STRA 34 and ENV 8 of our Unitary Development Plan that we adopted in January 2007. (R18AA)

Informative(s):

- 1 You are reminded that, prior to commencing demolition, you have undertaken to comply with the Council's Code of Construction Practice by submitting a Site Environmental Management Plan (SEMP) (and to monitoring) and a Section 61 application under the Control of Pollution Act 1974. The SEMP should be submitted a minimum of 40 working days prior to demolition commencing and the Section 61 a minimum of 28 days prior to works commencing on site.

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City of Westminster

TOWN AND COUNTRY PLANNING ACT 1990 PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

Applicant's Rights and General Information

1. Applicant's Rights (refusals and conditional approvals)

a) Appeals to the Planning Inspectorate

If your application has been **refused** by the City Council or **granted subject to conditions** that you are not happy with, you have the right to appeal to the Planning Inspectorate (under Section 78 of the Town and Country Planning Act 1990 or Section 20 of the Planning (Listed Buildings and Conservation Areas) Act 1990). The Planning Inspectorate is an Executive Agency reporting to the Secretary of State for Communities and Local Government.

The time limits for submitting an appeal may vary. The period after the date of the City Council's decision within which an appeal must be received by the Secretary of State is:

- **28 days** in the case of an appeal against refusal of a planning application relating to the same or substantially the same land and development as is already the subject of an enforcement notice.
- **8 weeks** in the case of an appeal against refusal of advertisement consent.
- **12 weeks** in the case of appeals made under s78(1) against refusal of any 'householder application' – that is,
 - refusal of an application for planning permission to alter or extend a house, or for works within the curtilage of a house.
 - Refusal to approve details submitted as required by a condition imposed on a permission granted for a householder application.
 - Refusal of prior approvals relating to dwelling houses, including the neighbours' consultation scheme for larger home extensions under Class A of Part 1 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order.
- **12 weeks** in the case of 'minor commercial applications' that is,
 - refusal of an application for development of an existing building or part of a building currently in use for any purposes in Classes A1, A2, A3, A4 and A5 where the proposal does not include a change of use, a change to the number of units, development that is not wholly at ground floor level and/or does not increase the gross internal area of the building.
 - Interested parties have no right to comment on an appeal with regards to a minor commercial development (specifically a shopfront).
- **6 months** in the case of all other appeals made under s78(1) or s20 of the above Acts relating to a decision on a planning application or listed building consent application. The 6 month time limit also applies to any appeal made under s78 (2) of the Act in respect of a failure to give a decision within the statutory period.

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
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With immediate effect, prospective appellants requesting an inquiry into their appeal must notify the Local Planning Authority and Planning Inspectorate at least 10 days prior to appeal submission.

If you want to appeal, you must use the correct appeal form from the following list: Planning, Householder, Minor Commercial, Listed Building Consent or Certificate of Lawful Use or Development.

The Planning Inspectorate has an online appeals service: www.planningportal.gov.uk/pcs. The Inspectorate will publish details of your appeal on the internet (on the Appeals area of the Planning Portal). This may include a copy of the application form and associated documents and the completed appeal documents. Please ensure that you only provide information, including personal information, that you are happy will be made available to others in this way. If you supply personal information belonging to a third party please ensure that you have their permission to do so. More detailed information about data protection and privacy matters is available on the Planning Portal. Alternatively, you can obtain a form from the **Customer Support Team, Planning Inspectorate, 3/08a, Kite Wing, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN Tel: 0303 4440000**. An extension of time for lodging an appeal is unlikely to be granted except in special circumstances. There is a guide and other useful advice about appeals on line at www.planningportal.gov.uk/planning/appeals/online/makeanappeal

APPROVAL OF DETAILS:

If your application has been granted and is subject to the approval of details reserved by condition please use the form 'Application For Approval Of Details Reserved By Condition' in order to discharge the relevant details. This form can be downloaded from the City Council's web site at www.westminster.gov.uk/planning

b) Purchase Notices

In certain circumstances the owner of a property has the right to serve a Purchase Notice on the City Council or the Department for Communities and Local Government. A Notice may be served if, following a refusal or a conditional approval, the owner considers the land cannot be put to a reasonably beneficial use in either its existing state or through development which has or would be permitted. A Purchase Notice would require the City Council to purchase the owner's interest in the land in accordance with the relevant provisions of the Acts (Part VI of the Town and Country Planning Act 1990 and Sections 32-37 of the Planning (Listed Buildings and Conservation Areas) Act 1990).

2. General information relating to all approvals

a) Other legislative requirements

This decision has been made by the City Council as the local planning authority. You are reminded of the need to comply with other relevant regulations and statutory provisions and respect the rights of other owners/occupiers provided by relevant property legislation.

Transportation: If your proposal involves works which affect the public highway you should consult the City Council as Highways Authority. This includes works to, over or below any carriageway, footway or public forecourt. You should contact the Highways Planning Team by email

Note:

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highwaysplanning@westminster.gov.uk or telephone 020 7641 3326. If your proposal is related to paving works and/or is associated with an agreement under Section 106 of the Town and Country Planning Act 1990 please telephone: 020 7641 2920.

Highways Licensing: For general enquiries about temporary structures on the highway, such as hoardings, skips, the excavation and storage of materials on the highways, please telephone 020 761 2000.

Building Control: You are advised to contact Westminster District Surveyors immediately to find out whether your proposal will require consent under the Building Regulations: Tel: 020 7641 6500 Email :districtsurveyors@westminster.gov.uk.

Building Regulation forms and further information is available on the Council's web site: <http://www.westminster.gov.uk/services/environment/landandpremises/buildings/forms/>

Land Drainage: Where major works are involved, Land Drainage Consent may be required under the Water Resources Act 1991 and Thames Region Land Drainage By Laws 1981. You are advised to contact the Environment Agency, Apollo Court ,2 Bishop's Square Business Park, St Albans Road West Hatfield AL10 9EX Tel: 03708 506 506 or email:enquiries@environment-agency.gov.uk.

b) Provision of access and facilities for disabled people

Designing new buildings and adapting existing buildings to meet the needs of people with disabilities results in a safer and more convenient environment for all. General advice is available from planning and building control officers who can also direct you to appropriate sources of technical/specialist advice.

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Appendix B

Existing Habitats

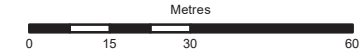
B1 Phase 1 Habitat Map

○



Legend

- Red line boundary
- (Scattered trees
- Amenity grassland
- Building
- Introduced shrub



P0	2019-10-14			
Rev	Date	By	Chkd	Appd

Coordinate System: British National Grid

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

John F Hunt

Ebury Bridge Estate

Phase 1 Habitat Survey

Scale at A4
1:1,404
Role

Suitability
Issue

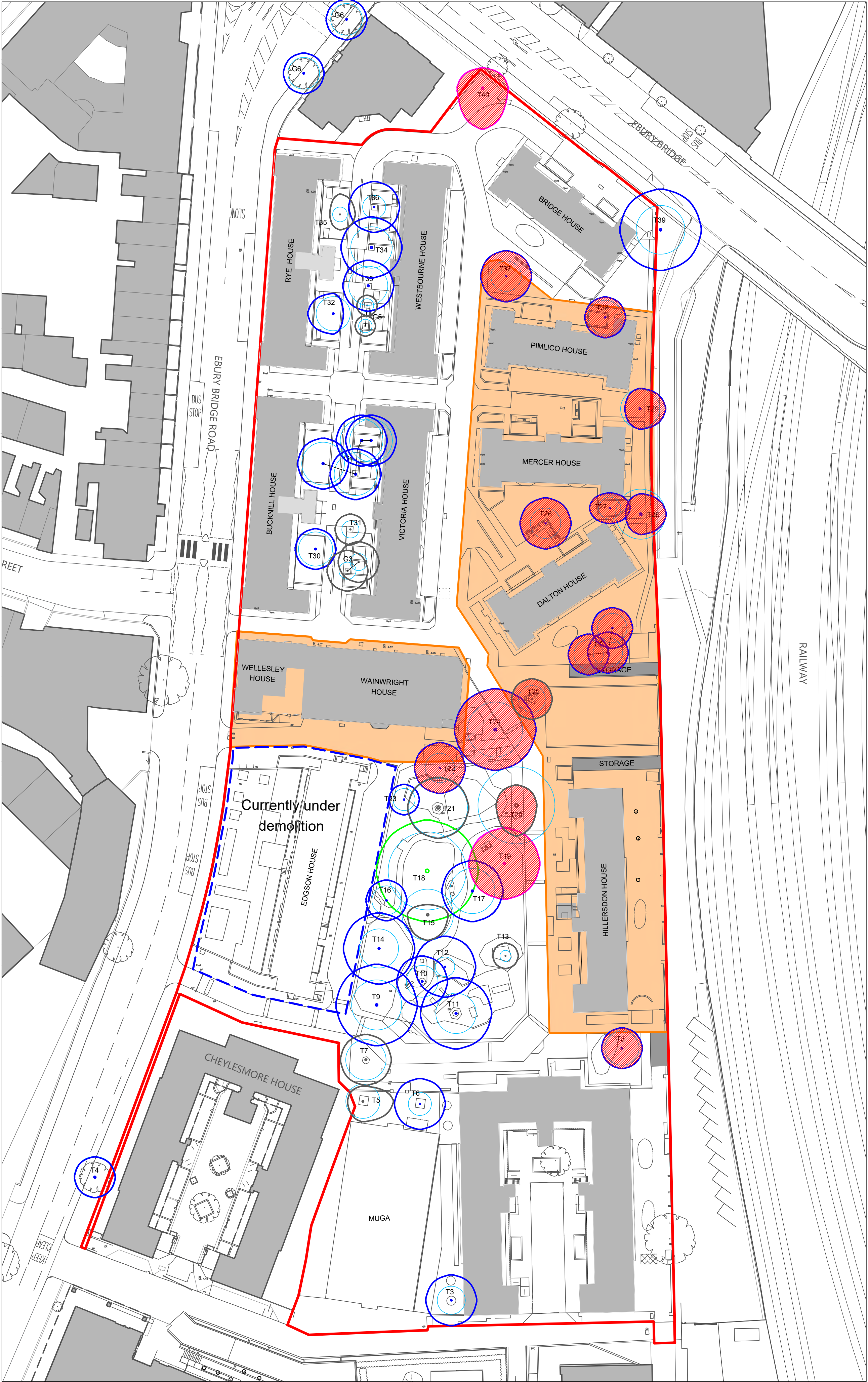
Arup Job No	257461-95	Rev	P0
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Name
001

Appendix C

Proposed Scheme

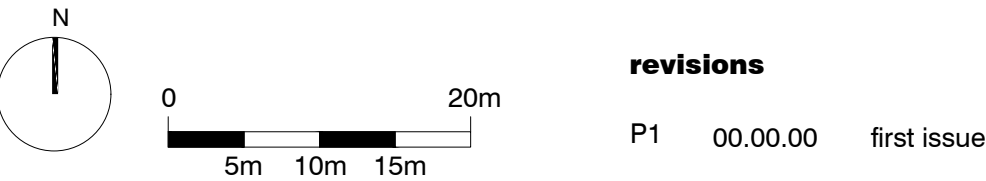
C1 Phase 1 and 1 A Tree Removal Plan



- KEY:
- SITE PARAMETER
- EXTENT OF EBURY BRIDGE ESTATE
 - AREA PROPOSED FOR DEMOLITION AS PART OF PRIOR APPROVAL (0.54ha)
- TREES
- For removal as part of Prior Approval for Demolition
 - Category A
Trees of high quality
 - Category B
Trees of moderate quality
 - Category C
Trees of low quality
 - Category U
 - RPA using formula in accordance with BS5837:2012

- standard notes
- Do not scale this drawing.
 - All dimensions must be checked on site and any discrepancies verified with the architect.
 - Unless shown otherwise, all dimensions are to structural surfaces.

THIS IS NOT A CONSTRUCTION DRAWING, IT IS UNSUITABLE FOR THE PURPOSE OF CONSTRUCTION AND MUST ON NO ACCOUNT BE USED AS SUCH.



revisions		
P1	00.00.00	first issue

Ebury Public Realm Westminster

date
28/08/19

client
Westminster City Council

scale
1:500@A1

drawn
GT

checked
AB

drawing number
3616_L_009

rev
P1

Levitt Bernstein
Thane Studios - Thane Villas 2-4
London
N7 7PA

t: 020 7275 7676
f: 020 7275 9348
w: levittbernstein.co.uk
e: post@levittbernstein.co.uk

Levitt Bernstein

File:location

C2 Proposed Scheme Tree Removal Plan

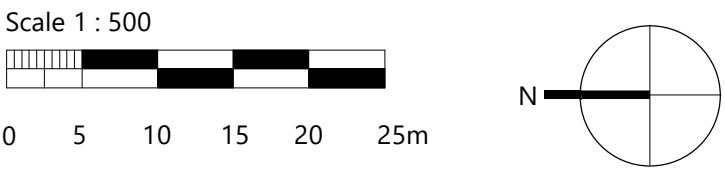
Key

- Site boundary
- Existing tree to be retained
(Tree numbers relate to survey by AGB Environmental Ltd)
- Trees already consented for removal under planning consent 19/06951/APAD
- Trees to be shown for removal within current proposal



T22 shown to be retained contrary to the consented proposal 19/06951/APAD

C3 Proposed Site Plan



- Legend
- Application Site Boundary
 - Phase 01 Building Construction
 - Phase 02 Building Construction
 - Phase 03 Building Construction
 - Extent of Building Footprint
 - Extent of Podium

P01	Issued For Pre-Planning	xx/02/20	NT	SW	
Rev	Description	Date	Dr	Ap	

Revisions

astudio

The Tower Building, 8th Floor, 11 York Road, London SE1 7NX
T: +44(0)207 401 4100 E: info@astudio.co.uk
www.astudio.co.uk

Client



City of Westminster

Project

Ebury Bridge Estate
Ebury Bridge Road, London, SW1X 8QX

Project number	BIM Status	Issue status
19003	S0	WIP

Drawing name

Proposed Site Plan (Phase 01 Detail
Outline Masterplan) – Application

Drawing number

EBE-AST-XX-XX-DR-A-011200

Project	Orig	Zone	Location	Type	Role	Sequence Number
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Scale	Format	Rev
1 : 500	A1	P01






Disclaimer: This drawing is to be read in conjunction with all related drawings. Do not scale from this drawing. All dimensions must be checked and verified on site before commencing any work or producing shop drawings. The originator should be notified immediately of any discrepancy. This drawing is copyright and remains the property of and Astudio Architecture.

C4 Open Space

6.03.1 Open space strategy

- Create transitional zones between public and private spaces through different layers of landscaping.
- Public spaces to face active frontages and be well overlooked.
- Provide a variety of activities taking into account the needs of different users.
- Public realm design to help the visitor orientate through the masterplan.
- The choice of tree species and planting shall reflect the spatial hierarchy whilst encouraging and attracting biodiversity.
- Vibrant and attractive planting shall be introduced to create playful and interesting landscape character.

Key (Figure 19)

Public openspace	
Private amenity space assigned to a dwelling	
Communal residential amenity (first floor podium)	
Public square outline (approximate)	
Nursery secure openspace (first floor podium)	



C5 Soft Landscaping

6.13 Tree strategy

6.13.1 Existing trees

A survey of existing trees has been undertaken in accordance with BS 5837:2012 and is available as part of this planning submission. An existing planning consent for demolition of part of the Ebury Bridge Estate (19/06951/APAD) includes the removal of approximately 32% of the existing trees, the majority of which are identified as being Category B in condition. Six existing trees are to be retained within the public realm proposals, of which 5 are Category B and 1 are Category C. An existing Category A tree within the site (Caucasian Wingnut) is proposed for replacement due to the constrained nature of it's location within the development masterplan. Whilst being of a high quality within it's current setting, the tree has a low canopy spread and suckering growth and it is situated in a location which requires new paving to support vehicular access. The retention of the tree is not feasible and instead a mitigation strategy for it's removal is proposed. Existing trees to be retained will be protected in line with BS 5837:2012 and all future detailing of proposals with potential to impact existing trees should be completed with the input of an arboriculturalist.

6.13.2 New tree planting

The new masterplan provides an opportunity to implement a wholesale new strategy which will ensure tree cover 50+years into the future. The intended framework will focus on 'right plant, right place' principles with sound consideration to space available for future above ground canopy and below ground rooting zones.

Trees will typically be planted into 'soft' areas without the need for intensive tree pits under-sailing paving, excepting the three 'anchor' trees proposed for the Community Hub square. All trees will have irrigation pipes and underground guying with adequate drainage provision. Where over basement slabs, raised edges to planted areas will ensure adequate soil depths. Trees will typically be sized 18-20cm girth at the time of planting with few instances of sizes below this within the public realm to avoid vandalism. There will be limited locations in which new trees will be sized over 18-20cm at planting though the trio of 'anchor' trees proposed for the Community Hub square may be appropriate for planting at a larger size. The wind tunnel studies completed to date do not indicate a need for enhanced planting sizes in any locations.

New tree planting falls into nine broad categories as shown within figure 00. This ensures an appropriate complexity of trees that will achieve large canopy cover, wildlife interest, wayfinding, shading/cooling in summer, seasonal interest, a backdrop to proposed public realm spaces and buffering to private/semi-private spaces. Detailed design should involve further review of species with thrive within the Borough, in line with WCC Tree Officer comment. The palette will be biased towards deciduous trees with a limited range of evergreen specimens. All trees should be planted outside of summer months as rootballed or airpotted stock.

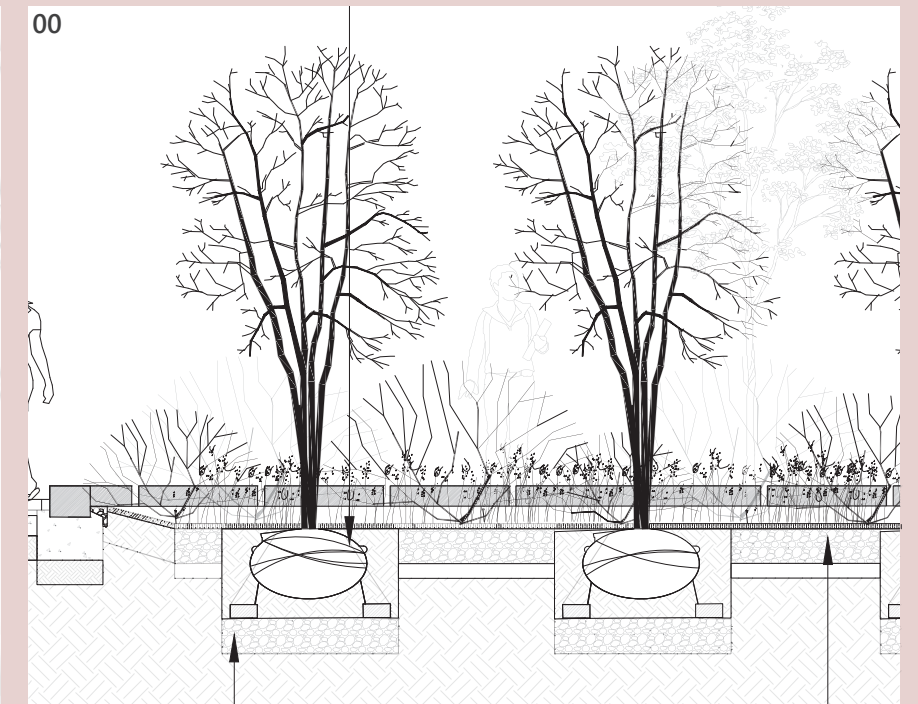
Gateway trees to the north and south will be flowering and medium in size with a form that will offer an appropriate level of consistency for these high-profile locations. Gateway trees to Ebury Bridge Road will be upright and suitable for 'street' settings in a medium size. Proposed trees within podiums and residential private curtilages will be small in scale with strong seasonal interest and a form that is either half-standard or multi-stemmed. The trio of 'anchor' trees to the Community Hub square will be an opportunity for large canopied trees which will hold the space outside of event times.

Figure 00: Proposed trees within podiums/residential curtilages
Figure 00: Proposed trees to Ebury Bridge Road gateways
Figure 00: Proposed trees to northern & southern gateways
Figure 00: Proposed trees within rain gardens
Figure 00: Anchor trees to Community Hub square
Figure 00: Standing trees to public squares
Figure 00: Proposed medium/large trees to public squares
Figure 00: Proposed small/medium trees to public squares
Figure 00: Proposed tree diagram



6.13.3 Key proposals relating to trees

- The palette will be biased towards deciduous trees with a limited range of evergreen specimens.
- In detailed design the locations of trees against building lines should reflect the ultimate canopy size and the need to maintain a clear-zone around the building line of approximately 1.5-2m.
- Proposed tree locations should avoid clashes with lighting columns, utility inspection covers and balconies.
- Tree species which drop fruit should be avoided over public realm spaces.
- Tree pit details should consider trees being planted into 'soft' with avoidance of intensive tree pit techniques unless strictly required.
- Tree planting should achieve an overall increase in quantum of trees across the estate of 450% but with an emphasis on 'right plant, right place' principles.
- Existing trees to be retained will be protected in line with BS 5837:2012, all detailing with potential to impact existing trees should be completed with the input of an arboriculturalist.
- Where tree planting is shown over basement slabs, raised edges to planted areas will ensure adequate soil depths (with adequate drainage provision) of approximately 900mm within public realm spaces and 600mm at first floor podium level.
- Detailing/specification will address the issue of soil/subsoil compaction post-construction for all soft/tree planting areas.



SECTION TO BE REVIEWED

Key (Figure 00)

- Existing trees to be retained (see Arboricultural Survey to BS 5837:2012 for trees within redline)
- Proposed trees within podiums and residential private curtilages
- Proposed trees within rain gardens
- Proposed trees to Ebury Bridge Road gateways
- Proposed trees to northern & southern gateways
- Trio of 'anchor' trees to Community Hub square (with intensive tree pit construction)
- Feature standing tree to public squares
- Proposed medium/large trees to public squares
- Proposed small/medium trees to public squares
- Buffer trees to Cheylesmore House boundary

6.14 Planting strategy

6.14.1 Specification aims

New planting will include a range of new palettes designed to suit their location. Planting will have a bent towards native and semi-native species that will fare well in the UK climate and generally require a low level of maintenance. Trees with fruit-drop will be avoided near to areas of paving and hedging will require only 1-2 cuts per year. Planting which is excessively spiny is not envisaged for significant use in public realm areas and so litter will be less likely to attach to planting.

Secure by Design considerations are incorporated into the planting proposals to ensure clear sight-lines across the public realm and a general feeling of safety within the openspaces. Trees will generally have a 2m clear-stem and planting will typically be maintained to 1m high.

Palettes are devised for both wildlife interest and the benefit of residents and visitors, with an emphasis on seasonal value.

6.14.2 Planting palettes

A wholesale new approach to planting will include a complexity of trees, hedge planting, rain gardens, planting inspired by native woodlands, textural grasses within podium areas and adjacent to private terraces.

Key

Woodland mix

Rain garden mix

Defensive mix

Productive mix



Woodland mix



Evergreen understory planting, shade & drought tolerant - native, pollen rich species ground cover planting - bulbs to add spring interest - white/yellow, green and dark green

Rain garden mix



Species to reflect SUDS design - drought tolerant perennials & shrubs - nectar-rich herbaceous plants or native shrubs - orange/yellow, blue, dark green

Dwelling defence mix



Evergreen native shrubs for year-round interest - rich, mixed ornamental grasses and perennials & shrubs - sensory/ scented planting - white/yellow, green, silvery green

Non-resi defence mix



Feature flowering shrubs for year-round interest - ornamental grasses and perennials & shrubs - sensory/ scented planting - white/yellow, dark green.

Productive mix



Raised growing areas / sensory planting - mixed vegetable and herb gardens - scented plants and native species to attract pollinating insects and other wildlife

Figure 00:
Figures 00-00:
Figures 00-00:
Figure 00:
Figures 00-00:

6.15 Ecology and biodiversity

6.15.1 Existing baseline condition

The existing estate area lacks complexity in terms of habitat provision and types of vegetation. The predominant condition is hard-standing with pockets of amenity grassland, shrubs and trees. Management of the site focusses on cleanliness and safety and not the ecological value of the estate. Surfaces are generally impermeable, lighting is inconsistent and fixtures again, make no consideration to night-time wildlife. The community of existing trees shows diversity in species present on the site ...

Great opportunity exists for an uplift in complexity of planting and habitat creation.

6.15.2 Specification aims

These palettes will be biased towards UK native species wherever possible as it is known that these species offer superior support to wildlife species. Management changes including use of pesticides and other COSHH chemicals. Balance between people and wildlife.

6.15.3 Ecological enhancements

New types of planting will include a complexity of trees, hedge planting, rain gardens, meadow, bulb layering and planting inspired by native woodlands. Plants which produce nectar throughout the year will be incorporated with a framework of shrubs that will offer nesting, foraging and commuting for bird species.

Aside from planting types, other ecological enhancements within Phase 1 will include bird boxes, bat boxes and elements of natural timber for wildlife to colonise.

Lighting has been designed to avoid unfavourable impact on wildlife at night and to reduce light spillage generally.

Across the wider masterplan, above ground level, opportunities to exploit roof level vegetated cover have been sought with areas of extensive green roof proposed on buildings 1 to 4.



Figure 00:

Figures 00-00:

Figures 00-00:

Figure 00:

Figures 00-00: Figure 00:

Figures 00-00:

Figures 00-00:

Figure 00:

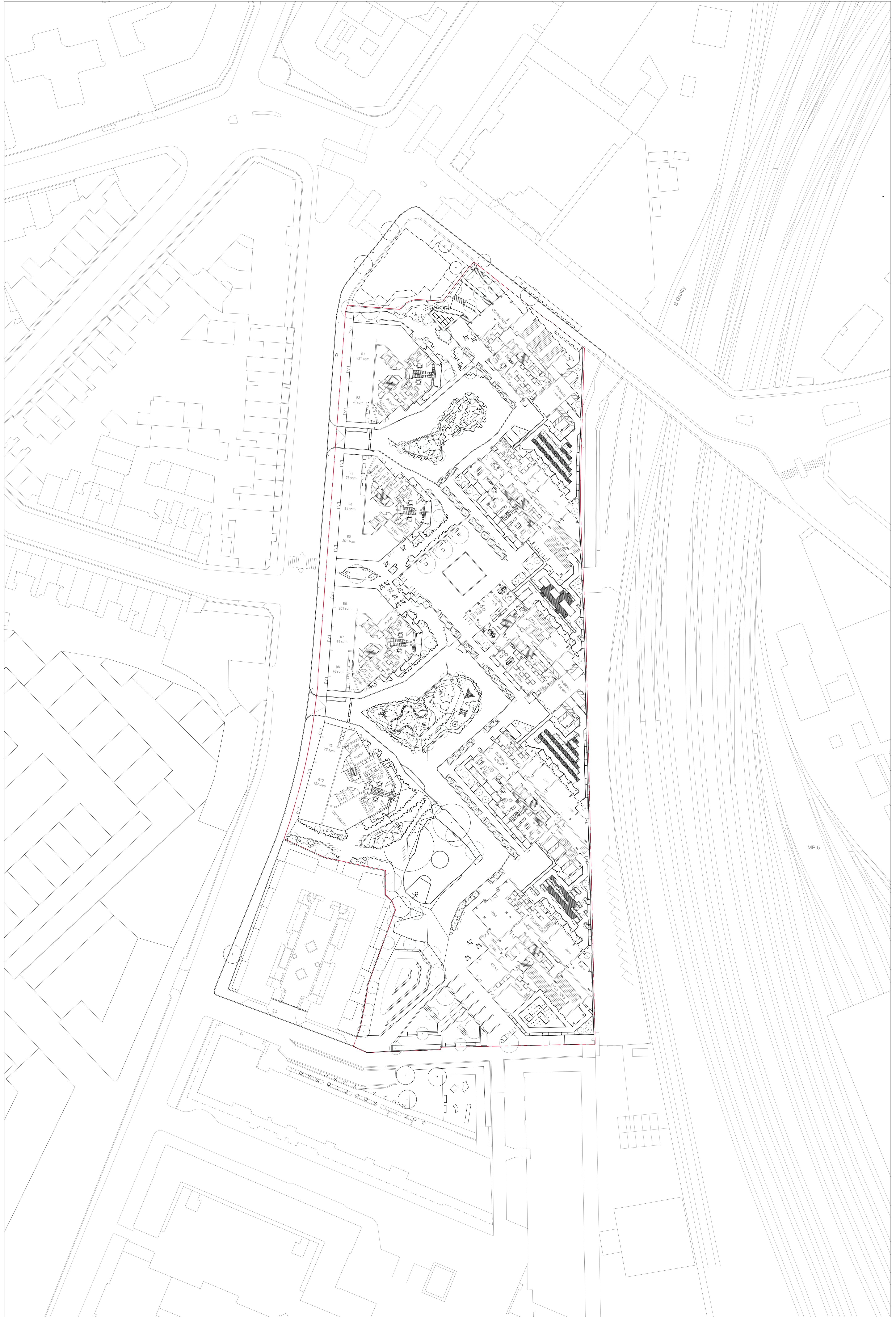
Figures 00-00:

6.13.4 Key proposals relating to ecology and biodiversity

- The landscape design proposals should naturally enhance the habitat complexity of the existing site.
- Development is to consider surrounding green infrastructure and habitat with a view to developing strategies that link up to existing wildlife corridors or create new ones.
- The incorporation of green roofs, green walls and features that would improve biodiversity levels will be encouraged.
- Planting palettes should consider a bias towards native and semi-native shrub and herbaceous planting which is well suited to UK climate.
- Habitat structures such as bat and bird boxes should be promoted with consideration to aspect, height and other key criteria for placement.
- Lighting design must consider promoting wildlife benefit, particularly around existing trees to be retained.
- The management and maintenance of the new public realm spaces should be coordinated to ensure regimes for soft and hard-landscape maintenance can be devised to ensure balance and continuity between objectives for biodiversity, safety, security, cleanliness and effective storm-water management.



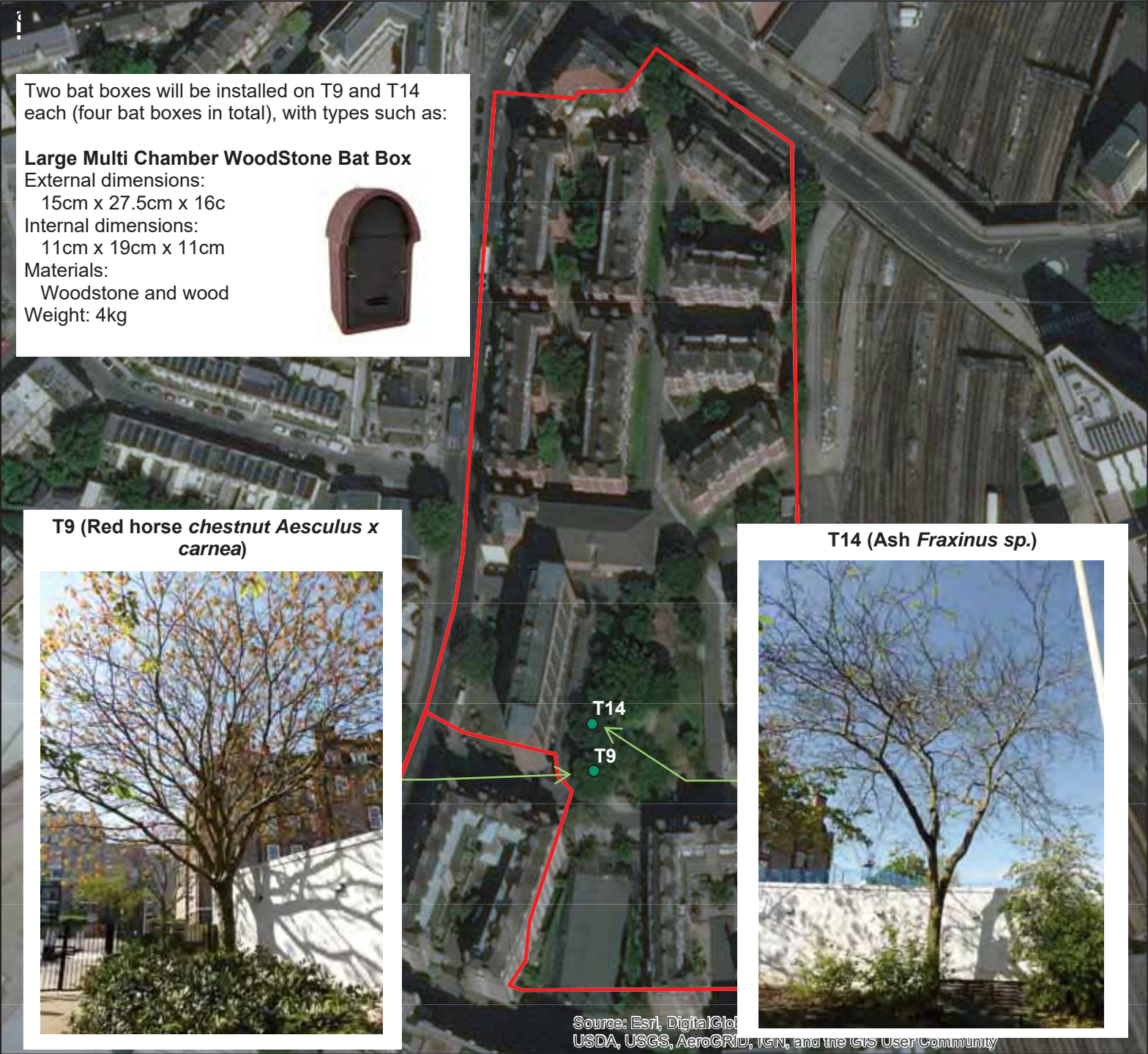
C6 Landscape Masterplan



Appendix D

Habitat Compensation

D1 Phase 1 and 1A Bat Box Locations



Two bat boxes will be installed on T9 and T14 each (four bat boxes in total), with types such as:

Large Multi Chamber WoodStone Bat Box

External dimensions:

15cm x 27.5cm x 16c

Internal dimensions:

11cm x 19cm x 11cm

Materials:

Woodstone and wood

Weight: 4kg



T9 (Red horse chestnut *Aesculus x carnea*)



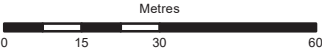
T14 (Ash *Fraxinus sp.*)



Legend

Site boundary

Trees with two bat boxes



F1	2020-04-24	DT	GT	
Rev	Date	By	Chkd	Appd

Coordinate System: British National Grid

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client

John F Hunt Ltd

Project Title

Ebury Bridge Renewal

Figure

Specifications for Mitigation and Compensation - Existing Landscape

Scale at A4

1:1,455

Role

Suitability

Final

Arup Job No
257461-95

Rev
F1

Name

Figure E3

D2 Proposed Scheme Bat Box Locations

Six bat boxes will be integrated into the new building facades as part of the proposed development (consent pending), with types such as:

Habibat 001 Bat Box Bespoke Facing

Dimensions:

215 mm wide x
440 mm high x
102 mm deep

Material:

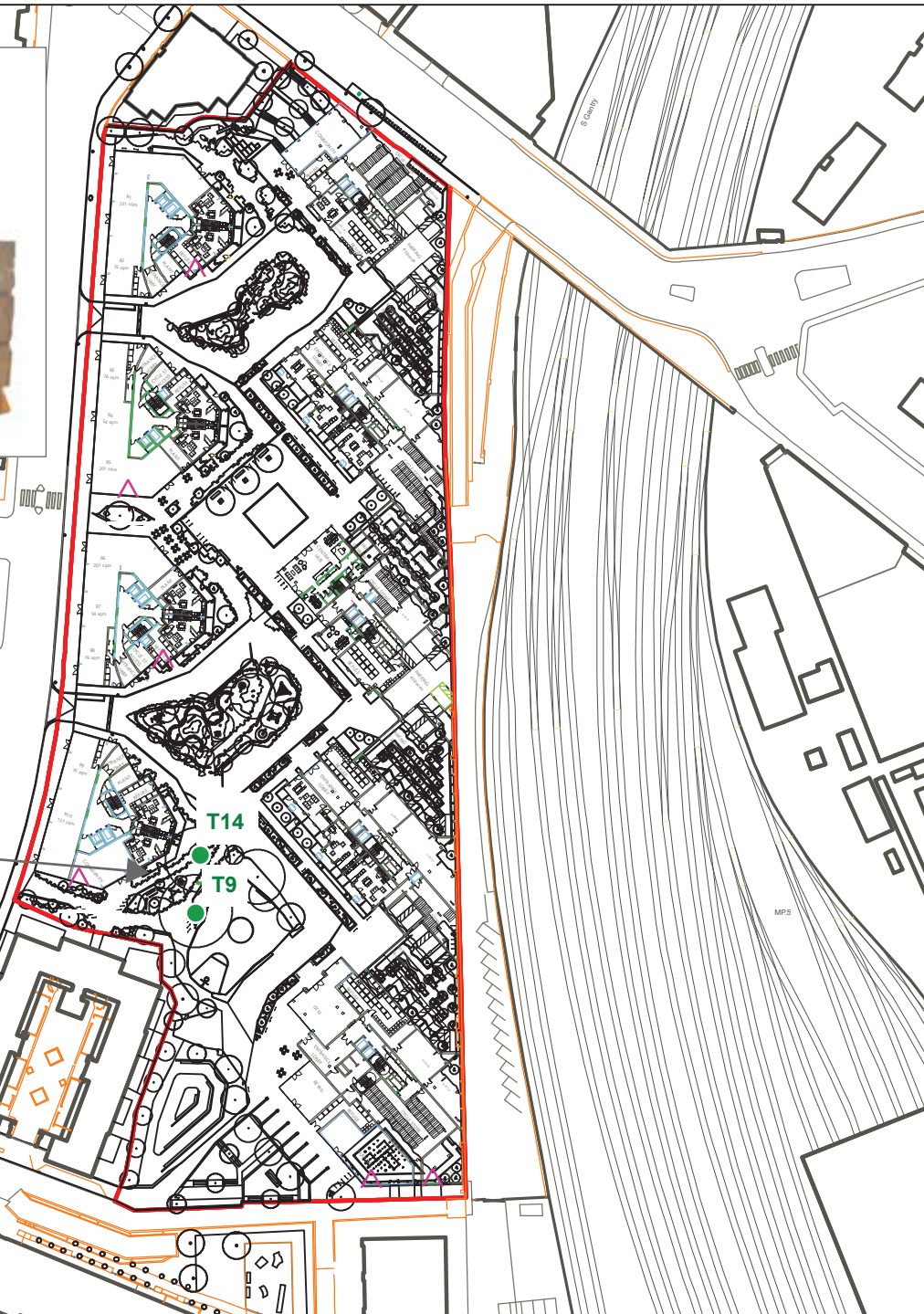
Concrete plus facing product

Weight:

Approximately 7 kg



Two bat boxes will be installed as part of this licence application on T9 and T14 each (four bat boxes in total), with types such as Large Multi Chamber WoodStone Bat Box.



Legend

□ Site boundary

● Trees with two bat boxes

★ Bat boxes to be integrated into the new building facades as part of the proposed development (consent pending)

Metres				
0	15	30	60	
F1	2020-04-28	DT	GT	
Rev	Date	By	Chkd	Appd

Coordinate System: British National Grid

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13 Fitzroy Street
London W1T 4BQ
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www.arup.com

Client

John F Hunt Ltd

Project Title

Ebury Bridge Renewal

Figure
Specifications for Mitigation and Compensation - Proposed Development Landscape

Scale at A4

1:1,455

Role

Suitability

Final

Arup Job No

257461-95

Rev

F1

Name

Figure E3 supplementary information

WML-A13a-E5a&b – WORK SCHEDULE FOR BAT

ANNEXED LICENCE



Site name and address (as stated on the application form or licence granted): Ebury Bridge Estate, Ebury Bridge Road, London, SW1W 8RT

Please ensure that the work schedules are S.M.A.R.T and appropriate timescales are provided for each activity, to fit with order of events.

Complete these schedules to show timings for all categories of work (mitigation and compensation measures), and to show the main construction period. The most common activities are listed here, and you can add up to 6 more if needed. Leave blank if not applicable. Enter timing by stating **start and end dates, to nearest month and year** (see first lines for examples). Enter comments if you need to clarify timings. For very complex schemes (e.g. high impact or phased development schemes) if additional lines are needed please do add in. This work schedule will form part of any annexed licence.

E5a

PLEASE INCLUDE DATE OF SUBMISSION (e.g. 01 July 2016). This will be referenced in the annex		1 May 2020
Activity	Timing	Comments
Pre- development activity		
Example: Bat house creation (in advance of licence)	Sept-14 to Nov-14	Also put up 3 bat boxes before end of December 2015, in advance of works commencing
Creation of standalone bat feature/s (state completed and fit for purpose if created <u>before</u> licensable works due to commence)		
Installation of bat boxes pre-development works (state completed and fit for purpose if created <u>before</u> licensable works due to commence)	June 2020	Installation of four bat boxes on retained trees within the park at the site ahead of licensable works commencing.
Permanent exclusion measures (e.g. use of one-way excluders prior to permanent blocking of access points or destruction of roost)		

Bat emergence survey	May to June 2020	The survey aims to further inform soft-stripping methodology, by hopefully identifying the specific location of the roosts and therefore refining areas of the roofs that need to be soft stripped. The survey also aims to confirm the current assessment of the status of roosts (as day roosts rather than maternity).
Mid-development activity		
<i>Example: Capture exercise (e.g. by hand /hand-held nets, etc)</i>	<i>Sept-2016</i>	<i>By hand</i>
Pre-works inspection by Named Ecologist or Accredited Agent	June to October 2020	By hand using a torch and endoscope where necessary prior to soft-strip
Installation of protective measures (e.g. separation membranes whilst working in lofts)		
Disturbance by noise, illumination or vibration (please specify)		
Temporary exclusion measures (e.g. use of one-way excluders with access re-instated following works)		
Permanent exclusion measures (e.g. use of one-way excluders prior to permanent blocking of access points or destruction of roost)	June to October 2020	Should specific roost locations be identified during the emergence survey that can be excluded, one-way excluders will be installed at the roosts prior to the demolition of the buildings.
Capture exercise (e.g. by hand / hand-held nets, etc – please state)	June to October 2020	By hand, to remove bats within the roost in cases where one-way excluders fail to exclude all the bats inside, or if bats are recorded during the destructive search.
Destructive search by soft demolition	June to October 2020	Each building will be subject to a destructive search by way of soft stripping ahead of hard demolition. This is programmed as follows: Wellesley - June, Hillersdon - July; Dalton - August; Pimlico and Mercer - October. Bat features will be dismantled by the contractor as directed by the Named Ecologist or Accredited Agent and under direct supervision.

During development		
<i>Example: Mechanical demolition</i>	<i>Oct-2016</i>	<i>Buildings X and Y will be knocked down after sign off from Named Ecologist</i>
Mechanical demolition of all or part of structures (once declared free of bats by Named Ecologist or Accredited Agent) – please state	June 2020 to January 2021	Wellesley, Hillersdon, Dalton, Mercer and Pimlico Houses will be demolished after sign off from the Named Ecologist or Accredited Agent.
Construction period start and end dates	May 2021 to 2027	Construction is programmed in three phases: Phase 1 May 2021 to July 2023; Phase 2 February 2023 to 2025; and Phase 3 April 2024 to 2027.
Site checks and maintenance during construction	April 2021 to 2027	Bat boxes will be checked annually prior to and during construction.
Creation of mitigation/compensation during development	February 2023 to 2027	Creation of integrated bat boxes within proposed building facades during phases 2 and 3.
Post construction mitigation/compensation on 'development' site or other (provide details below)		
<i>Example: Installation of access points and bat boxes</i>	<i>Feb-2017</i>	<i>Access points will be installed after completion of new roof structure; remaining 3 x bat boxes installed by end of this month.</i>
Creation of mitigation/compensation post development (e.g. installation of bat tubes, bricks, boxes, access points, etc – specify in comments section)		
Habitat reinstatement or restoration (following temporary impacts)		
Hedgerow or woodland planting (please specify)		

E5b) Post-development works - type a "Y" where each activity will occur for a given year and leave blank for no activity.

Year:	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
-------	------	------	------	------	------	------	------	------	------	------	------	------

Monitoring												
Habitat management												
Site maintenance												

Year:	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039
Monitoring	Y		Y		Y							
Habitat management												
Site maintenance	Y		Y		Y							