AKA Capability LLP

Mount Clare House
Roehampton

Ecological Report

Job No: 243182
December 2024

Environmental Consultants

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Roehampton

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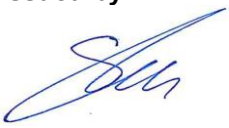

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Harry Simpson BSc (Hons) MSc

Approved by

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Issue Date	Issue
10 December 2024	Final

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Issue	Description of status

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1.0 INTRODUCTION

Overview

1.1 AA Environmental Limited (AAe) has been commissioned by AKA Capability LLP to carry out ecological surveys of the Mount Clare House site at Roehampton. The aims of the survey were to:

- provide a description of the existing habitat types;
- determine the existence and location of any ecologically valuable areas; and
- identify the presence of any protected species.

1.2 This information will serve to assess the ecological impact of the proposals and identify any ecological constraints and/or mitigation measures required and also identify any enhancement measures that may be available.

1.3 The development proposals include use of the site for temporary accommodation, with associated landscaping. The majority of the established vegetation will be retained, protected and enhanced as part of the scheme.

Site Description

1.4 The site is located off Minstead Gardens in Roehampton, London, centred at National Grid Reference: TQ 215739 and covers approximately 1.5 hectares. The site was formerly used by Roehampton University and is currently occupied by a number of tenants in accommodation, with the majority of the site currently vacant. The site comprised the existing buildings with associated hard and soft landscaping and boundary vegetation. It is bordered by Minstead Gardens to the east, a golf course and Richmond Park to the south, with residential properties and associated public areas to the north and west (Figure 1).

2.0 METHODOLOGY

General

2.1 The study comprised two key phases: a desk-top study; and walk-over field surveys. The study was undertaken with reference to the Institute of Environmental Assessment's '*Guidelines for Baseline Ecological Assessment*' (1995), Chartered Institute of Ecology and Environmental Management (CIEEM) '*Guidelines for Preliminary Ecological Appraisal*' (2017) and BS 42020: 2013 '*Biodiversity - Code of practice for planning and development*'.

Desk-top Study

2.2 Greenspace Information for Greater London (GIGL) was consulted in order to obtain baseline data held for the site and the surrounding 2 km area.

2.3 In addition, as certain baseline data is now readily available on the internet, the Multi-agency website (http://magic.defra.gov.uk/) was consulted to determine whether any part of the site or nearby habitats have been statutorily or otherwise designated and a review of Google Earth's satellite imagery (http://www.google.co.uk/intl/en_uk/earth/index.html) was completed to determine past land uses of the site and surrounding land.

Field Surveys

2.4 It was necessary to supplement the information obtained from the desk-top study with a walk-over field survey, in order to:

- ascertain whether, while the site itself or nearby habitats might not be covered by any ecological designations, they could be of ecological interest and/or contain protected species; and

- establish the ecological value of the site in order for the overall disturbance to ecosystems within the area to be fully evaluated.

2.5 An initial ecological walk-over survey of the site was carried out on Wednesday 12 June 2024. The dominant plant species were recorded, and habitats classified according to their vegetation types and presented in the standard UK Habitat Classification System (*UK Hab Ltd, 2023*). The weather conditions at the time of the survey were: 80% cloud cover; wind speed 2 (Beaufort scale); temperature 14°C; and no precipitation.

Habitat Evaluation

2.6 By applying recognised criteria produced by Ratcliffe (1977), the following seven-point scale was used to rank the importance of the habitat types and species they support. The value of each habitat was ranked according to its importance in a local context (a summary of the Ratcliffe criteria is attached at Appendix A):

- low value;
- low to intermediate value;
- intermediate value;
- intermediate to high value;
- high value (Local/District importance);
- very high value (County importance e.g. Site of Importance for Nature Conservation (SINC), County Wildlife Site); and
- exceptional value (National importance e.g. Site of Special Scientific Interest (SSSI)).

Fauna

2.7 Particular attention was paid to record the presence of/or suitable habitat for badgers, bats and herpetofauna (amphibians and reptiles), that may be present on the site or within adjacent habitats. In addition and where considered necessary, species specific Phase 2 surveys were completed. The surveys were carried out in accordance with the following survey methodologies:

Badgers

2.8 Badgers (*Meles meles*) and their setts are protected by *The Protection of Badgers Act 1992,* under which it is an offence to harm badgers or their setts. A sett is defined as "*any structure or place which displays signs indicating current use by a badger*". Natural England has provided the following guidance on the interpretation of current use:

A sett is defined as such (and thus protected) as long as signs indicative of 'current use' are present. Thus, a sett remains protected by the Act until such times as the signs (i.e. 'field signs') have deteriorated or decayed to such an extent that they indicate that the sett is no longer in 'current use'.

2.9 A thorough survey of the whole site and adjacent habitats, where access was available, was carried out. Particular attention was paid to dense areas of vegetation to check for any evidence of badger activity, which is usually detected by any one or more of the following signs:

- presence of holes with evidence of badger such as footprints, discarded hair, etc.;
- presence of dung pits and latrines;
- presence of well used runs with subsidiary evidence of badger activity; and
- presence of other indications of badger activity, such as signs of foraging and footprints.

Bats

2.10 Currently there are 17 species of bat known to breed in the UK. All species and their roosts are protected under Regulation 41 of *The Conservation of Habitats and Species Regulations 2010 (as amended)*. As a signatory to the *Bonn Convention* (Agreement on the Conservation of Bats in Europe) the UK is also required to protect their habitats. This legislation makes it illegal to kill, injure, capture or disturb bats or to obstruct access to, damage or destroy bat roosts. Under the law, a roost is any structure or place used for shelter or protection.

2.11 A visual survey of the site was completed to record any evidence of bats or features that could provide potential roosting opportunities. The survey was carried out following the guidelines provided by the Bat Conservation Trust[1] and by an experienced and licensed ecologist[2]. A thorough internal and external examination of the existing buildings was carried out, with any potential access points inspected for evidence of bats, and all internal roof voids/spaces, where present, accessed to check for any evidence of bats, with the buildings assessed in accordance with the following criteria:

- **None** – No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
- **Negligible** – No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
- **Low** - A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. 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 and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
- **Moderate** - A structure 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, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
- **High** - A structure 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. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

2.12 In addition, a Preliminary Ground Level Roost Assessment was completed for each tree within the vicinity of the works to identify those features that are important for roosting bats. Surveying trees presents particular problems at any time of the year as bats will use a wide variety of roost sites in cavities, splits, cracks, knotholes and under loose bark, many of which are not easily detected from the ground. Each tree was assessed in accordance with the following criteria:

- **NONE** – Either no PRF's in the tree or highly unlikely to be any.
- **FAR** – Further assessment required to establish if PRFs are present in the tree.
- **PRF** – A tree with at least one PRF present.

2.13 Where possible, any tree categorised as **FAR** or **PRF** was then subject to a more detailed assessment to either confirm PRFs are present and/or fully inspect any PRFs to accurately subcategorise each tree into:

[1] Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.
[2] Lead surveyor was Harry Simpson, BSc (Hons), MSc. Class Licence: 2023-11139-CL18-BAT.

- **PRF-I** – is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitat.
- **PRF-M** – PRF is suitable for multiple bats and may therefore be used by a maternity colony.

2.14 The surrounding habitat was also surveyed to identify any important features such as mature trees with suitable features for roosting bats and any established lines of vegetation that might provide important flightlines.

2.15 Evidence of bats is usually detected by any one or more of the following signs:

- the presence of bat droppings, which tend to accumulate under established roost sites or at roost entrances;
- the accumulation of large numbers of moth wings, which have been discarded by feeding bats;
- areas of staining by urine or from fur rubbing; and
- the presence of bats themselves or their corpses.

2.16 The visual survey was facilitated by the use of binoculars, ladders, powerful torches (1M candlepower) and a Ridgid Micro CA-350 Inspection Camera endoscope. A heterodyne bat detector (Pettersson D200) was also used to record any bat calls during the inspection.

2.17 In addition to the above, as Mount Clare House was assessed to provide **low** roosting opportunities for bats, a single emergence/activity bat survey was completed. Three experienced surveyors carried out the survey (details provided in Table 1) using direct observation and a range of bat detectors to record bat activity and supplemented with Night Vision Aids (NVAs). The following bat detectors were used on the site: heterodyne/frequency division (Pettersson D230); real time expansion Echo Meters (EM3+); and zero crossing recorder (Anabat SD2). The calls recorded from the EM3 detectors were analysed using BatSound software and the calls on the Anabat detector analysed using Analook software. A single NVA was used, being a Canon XA camera (XA15), supplemented with infrared lights.

Table 1: Surveyors

Date	Surveyor
22.07.24	Julian Thornber – 2015-13307-CLS
	Dave Endacott - 2015-10616
	Kathy Warden - 2015-12571

2.18 Bat activity is strongly influenced by weather conditions and time of night. Peak activity occurs at dusk, but activity continues throughout the night as bats can commute long distances from their roosts to particular foraging sites (depending upon the species). For this reason, the emergence/activity survey started 30 minutes before sunset and continued for approximately 2 hours.

2.19 The emergence/activity survey was carried out on the evening of Monday 22 July 2024. The weather conditions were considered ideal to record bat activity and are summarised in Table 2. The building was re-checked prior to the survey[3].

Table 2: Bat Emergence Weather Conditions

Date	Temp (°C)	Cloud (Oktas)	Rain	Wind (Beaufort scale)
22.07.24	21-18	1	Dry – no rain	1

[3] Completed by a licenced and experienced ecologist with care taken to minimise disturbance to any roosting bats that can affect emergence activity.

Herpetofauna

Amphibians

2.20 All amphibian species have some level of protection under *The Wildlife and Countryside Act 1981 (as amended).* Great crested newts (*Triturus cristatus*) are protected under *The Wildlife and Countryside Act 1981 (as amended)* and *The Conservation of Habitats and Species Regulations 2010 (as amended)*. The intentional or reckless killing, injury or taking, and intentional or reckless disturbance of great crested newts whilst occupying a 'place used for shelter or protection', is prohibited, as is the destruction of these places.

Reptiles

2.21 All reptile species are protected at some level under Schedule 5 of the *Wildlife and Countryside Act 1981 (as amended)* and *The Conservation of Habitats and Species Regulations 2010 (as amended)*. The more common species of reptiles, which include slow-worm (*Anguis fragilis*), common or viviparous lizard (*Zootoca vivipara*), adder (*Vipera berus*) and grass snake (*Natrix helvetica*) are protected by the *Wildlife and Countryside Act 1981 (as amended)* by part of *Section 9(1)* and all of *Section 9(5).* This means that they are protected against intentional or reckless killing and injuring (but not 'taking') and against sale and transporting for sale.

2.22 As some suitable reptile habitat was recorded on the site, with additional habitat recorded adjacent to the south and a number of species records returned by GiGL for adjacent land, it was considered necessary to carry out Phase 2 reptile surveys on the site to determine presence/absence of reptiles. The surveys were carried out in the optimal month of September 2024. A total of 55 artificial refugia (felt mats measuring approximately 0.5 - 1 m^2) were positioned within suitable reptile habitat. The use of artificial refugia is thought to be the most efficient and effective method for recording the presence of reptiles. The artificial refugia were left undisturbed for a settlement period of at least seven days before returning to the site.

2.23 A number of repeat lifts were carried out in order to confirm the presence/absence of reptiles on the site. The lifts were conducted during suitable weather conditions in order to record the maximum number of reptiles basking on or under the sheets. In addition, any artificial or natural refugia already present on the site was also lifted to check for any sheltering animals or evidence of animals such as sloughs (shed skins). The weather conditions during the survey are shown in Table 3.

Table 3: Reptile Survey Weather Conditions

Date	Temp (°C)	Cloud Cover (Oktas)	Wind (Beaufort Scale)	Precipitation
04.09.24	19	3	2	None
06.09.24	19	5	1	None
09.09.24	18	5	1	None
13.09.24	12	0	1	None
16.09.24	21	0	0-1	None
18.09.24	18	3	1	None
26.09.24	16	2-3	0-1	None

Other Species

2.24 In accordance with good practice, the site was checked for any evidence of other protected species or species of particular note.

3.0 RESULTS

Desk-top Study

3.1 A summary of the baseline data obtained from GIGL has been provided and detailed in Table 4; please note, due to sensitivity/copyright, a copy of the report cannot be reproduced but can be requested by the Local Planning Authority[4].

3.2 There are no statutory designated ecological sites located on or adjacent to the site. The nearest statutory designated site is Richmond Park Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and National Nature Reserve (NNR), located 0.15 km to the west of the site. The nearest non-statutory designated site is Richmond Park and associated areas Site of Importance for Nature Conservation (SINC), located adjacent to the south-west of the site. Full details of the designated sites located within the 2 km study area are provided in Table 4.

3.3 There were no records of protected species located on or adjacent to the site. There are a number of records of protected species within the 2 km study area, the majority of which were supplied with specific 6-figure grid references allowing a high-resolution indication of their locations. Further details of protected species recorded within 2 km of the site are provided in Table 4.

3.4 According to the Multi-agency Website, there are no Habitats of Principal Importance (HPIs) located on or adjacent to the site, with the nearest HPI being an area of Wood-pasture and Parkland, located approximately 0.20 km to the west of the site. The site also lies within a Network Enhancement Zone 2[5].

3.5 Google Earth Imagery shows that the site has remained largely unchanged since 2002, being dominated by the existing university buildings, including accommodation and offices, with associated hard and soft landscaping and boundary vegetation.

Table 4: Summary of Data Search Results (GIGL)

Statutory Designated Sites		
Description	**Protection/designation**	**Distance/direction**
Richmond Park	SAC	0.15 km to the W
Richmond Park	SSSI	0.15 km to the W
Richmond Park	NNR	0.15 km to the W
Wimbledon Common	SAC	1.12 km to the SE
Wimbledon Common	SSSI	1.12 km to the SE
Barnes Common	LNR	1.46 km to the N
Non-Statutory Designated Sites		
Description	**Protection/designation**	**Distance/direction**
Richmond Park and associated areas	SINC	Adjacent to the SW
Roehampton University	SINC	0.36 km to the N
Roehampton Club Golf Course	SINC	0.37 km to the N
Beverley Brook in Wandsworth	SINC	0.67 km to the NW
Beverley Brook from Richmond Park to the River Thames	SINC	0.67 km to the NW
Bank of England Sports Club Grounds	SINC	0.68 km to the NNW
Wimbledon Common and Putney Heath	SINC	0.93 km to the E
Putney Park Lane and The Pleasance	SINC	1.24 km to the E
Putney Vale Cemetery	SINC	1.26 km to the SE
Barnes Common	SINC	1.46 km to the N
Richard Evans Memorial Playing Fields & Stag Lane	SINC	1.51 km to the S
Beverley Brook in Kingston	SINC	1.63 km to the S
Old Mortlake Burial Ground	SINC	1.73 km to the NNW

[4] GIGL data cannot be passed on to any third parties (excluding local authorities), without express written permission.
[5] Land connecting existing patches of primary and associated habitats which is less likely to be suitable for creation of the primary habitat.

Protected/notable Species (Specific Grid References)		
Description	**Protection/designation**	**Distance/direction**
Description	Protection/designation	Distance/Direction
Pipistrelle Bat species (*Pipistrellus sp*.)	European Protected Species, Protected Species	0.16 km to the S
White-letter Hairstreak (*Satyrium w-album*)	Protected Species & Priority Species	0.18 km to the NW
Bats (*Vespertilionidae sp*.)	Protected Species	0.23 km to the NE
Common Frog (*Rana temporaria*)	Protected Species (against sale)	0.23 km to the NE
House Sparrow (*Passer domesticus*)	Priority Species	0.23 km to the NE
Bluebell (*Hyacinthoides non-scripta*)	Protected Species	0.29 km to the SE
Redwing (*Turdus iliacus*)	Protected Species	0.30 km to the NW
Cinnabar (*Tyria jacobaeae*)	Priority Species	0.30 km to the SW
Small Heath (*Coenonympha pamphilus*)	Priority Species	0.30 km to the SW
Common Pipistrelle (*Pipistrellus pipistrellus*)	European Protected Species & Protected Species	0.35 km to the E
Stag Beetle (*Lucanus cervus*)	European Protected Species, Protected Species (against sale) & Priority Species	0.35 km to the NW
Kingfisher (*Alcedo atthis*)	Protected Species	0.35 km to the SW
Lapwing (*Vanellus vanellus*)	Priority Species	0.42 km to the W
Dunnock (*Prunella modularis*)	Priority Species	0.45 km to the SE
Fieldfare (*Turdus pilaris*)	Protected Species	0.45 km to the SE
Song Thrush (*Turdus philomelos*)	Priority Species	0.45 km to the SE
Starling (*Sturnus vulgaris*)	Priority Species	0.45 km to the SE
West European Hedgehog (*Erinaceus europaeus*)	Priority Species	0.45 km to the SE
Skylark (*Alauda arvensis*)	Priority Species	0.45 km to the W
Soprano Pipistrelle (*Pipistrellus pygmaeus*)	European Protected Species, Protected Species & Priority Species	0.50 km to the NW
Common Toad (*Bufo bufo*)	Protected Species (against sale) & Priority Species	0.55 km to the S
Great Crested Newt (*Triturus cristatus*)	European Protected Species, Protected Species & Priority Species	0.55 km to the S
Daubenton's Bat (*Myotis daubentonii*)	European Protected Species & Protected Species	0.57 km to the S
Noctule Bat (*Nyctalus noctula*)	European Protected Species, Protected Species & Priority Species	0.57 km to the S
Dark Crimson Underwing (*Catocala sponsa*)	Priority Species	0.64 km to the SW
Herring Gull (*Larus argentatus*)	Priority Species	0.69 km to the SE
Reed Bunting (*Emberiza schoeniclus*)	Priority Species	0.69 km to the SE
Grass Snake (*Natrix helvetica*)	Protected Species & Priority Species	0.70 km to the E
Blood-vein (*Timandra comae*)	Priority Species	0.71 km to the NW
Chamomile (*Chamaemelum nobile*)	Priority Species	0.71 km to the S
Cuckoo (*Cuculus canorus*)	Priority Species	0.71 km to the S
Linnet (*Linaria cannabina*)	Priority Species	0.71 km to the S
Red Kite (*Milvus milvus*)	Protected Species	0.71 km to the S
Spotted Flycatcher (*Muscicapa striata*)	Priority Species	0.71 km to the S
Wall (*Lasiommata megera*)	Priority Species	0.71 km to the S
Bristol Whitebeam (*Sorbus bristoliensis*)	Priority Species	0.74 km to the NE
Orchard Toothcrust (*Sarcodontia crocea*)	Priority Species	0.74 km to the NE
Scaup (*Aythya marila*)	Protected Species & Priority Species	0.74 km to the NE
Nathusius's Pipistrelle (*Pipistrellus nathusii*)	European Protected Species & Protected Species	0.83 km to the SW
Oak Hook-tip (*Watsonalla binaria*)	Priority Species	0.85 km to the SW
Slow-worm (*Anguis fragilis*)	Protected Species & Priority Species	0.88 km to the NE
Ear Moth (*Amphipoea oculea*)	Priority Species	0.88 km to the SW
Latticed Heath (*Chiasmia clathrata*)	Priority Species	0.88 km to the SW

Brown Long-eared Bat (*Plecotus auritus*)	European Protected Species, Protected Species & Priority Species	0.90 km to the E
Common Lizard (*Zootoca vivipara*)	Protected Species & Priority Species	0.93 km to the NW
Bat (*Chiroptera sp.*)	European Protected Species, Protected Species	0.96 km to the NW
Lesser Noctule (*Nyctalus leisleri*)	European Protected Species & Protected Species	0.96 km to the SW
August Thorn (*Ennomos quercinaria*)	Priority Species	1.02 km to the SW
White Admiral (*Limenitis camilla*)	Priority Species	1.06 km to the SE
Natterer's Bat (*Myotis nattereri*)	European Protected Species & Protected Species	1.14 km to the SW
Black-necked Grebe (*Podiceps nigricollis*)	Protected Species	1.15 km to the NE
Brambling (*Fringilla montifringilla*)	Protected Species	1.21 km to the NE
Lesser Redpoll (*Carduelis cabaret*)	Priority Species	1.21 km to the NE
Ring Ouzel (*Turdus torquatus*)	Priority Species	1.21 km to the NE
Yellowhammer (*Emberiza citrinella*)	Priority Species	1.24 km to the SE
Brown Hairstreak (*Thecla betulae*)	Protected Species & Priority Species	1.32 km to the E
Purple Emperor (*Apatura iris*)	Protected Species	1.33 km to the E
Osprey (*Pandion haliaetus*)	Protected Species	1.36 km to the W
European Eel (*Anguilla anguilla*)	Priority Species	1.42 km to the S
Darnel (*Lolium temulentum*)	Priority Species	1.46 km to the SE
Firecrest (*Regulus ignicapilla*)	Protected Species	1.46 km to the SE
Feathered Gothic (*Tholera decimalis*)	Priority Species	1.48 km to the W
September Thorn (*Ennomos erosaria*)	Priority Species	1.48 km to the W
Rosy Rustic (*Hydraecia micacea*)	Priority Species	1.52 km to the W
Myotis Bat species (*Myotis sp.*)	European Protected Species, Protected Species	1.54 km to the S
Brindled Beauty (*Lycia hirtaria*)	Priority Species	1.54 km to the SE
Hedge Rustic (*Tholera cespitis*)	Priority Species	1.54 km to the SE
Knot Grass (*Acronicta rumicis*)	Priority Species	1.54 km to the SE
Little Gull (*Hydrocoloeus minutus*)	Protected Species	1.55 km to the S
Autumnal Rustic (*Eugnorisma glareosa*)	Priority Species	1.56 km to the SE
Centre-barred Sallow (*Atethmia centrago*)	Priority Species	1.56 km to the SE
Dusky Thorn (*Ennomos fuscantaria*)	Priority Species	1.56 km to the SE
Green-brindled Crescent (*Allophyes oxyacanthae*)	Priority Species	1.56 km to the SE
Grey Dagger (*Acronicta psi*)	Priority Species	1.56 km to the SE
Heath Rustic (*Xestia agathina*)	Priority Species	1.56 km to the SE
Mottled Rustic (*Caradrina morpheus*)	Priority Species	1.56 km to the SE
Olive Crescent (*Trisateles emortualis*)	Priority Species	1.56 km to the SE
Powdered Quaker (*Orthosia gracilis*)	Priority Species	1.56 km to the SE
Rustic (*Hoplodrina blanda*)	Priority Species	1.56 km to the SE
Shaded Broad-bar (*Scotopteryx chenopodiata*)	Priority Species	1.56 km to the SE
Small Phoenix (*Ecliptopera silaceata*)	Priority Species	1.56 km to the SE
Small Square-spot (*Diarsia rubi*)	Priority Species	1.56 km to the SE
White Ermine (*Spilosoma lubricipeda*)	Priority Species	1.56 km to the SE
Zoned Rosette (*Podoscypha multizonata*)	Priority Species	1.59 km to the SW
Swallowtail (*Papilio machaon*)	Protected Species	1.6 km to the NW
Garden Tiger (*Arctia caja*)	Priority Species	1.61 km to the NW
Green Sandpiper (*Tringa ochropus*)	Protected Species	1.61 km to the SW
Picture-winged Fly (*Dorycera graminum*)	Priority Species	1.66 km to the W
Dusky Brocade (*Apamea remissa*)	Priority Species	1.7 km to the SW
Goldeneye (*Bucephala clangula*)	Protected Species	1.75 km to the SW
Yellow Wagtail (*Motacilla flava*)	Priority Species	1.75 km to the SW
Bee-eater (*Merops apiaster*)	Protected Species	1.77 km to the SW
Bittern (*Botaurus stellaris*)	Protected Species & Priority Species	1.77 km to the SW
Black Redstart (*Phoenicurus ochruros*)	Protected Species	1.77 km to the SW
Black Tern (*Chlidonias niger*)	Protected Species	1.77 km to the SW
Black-tailed Godwit (*Limosa limosa*)	Protected Species & Priority Species	1.77 km to the SW

Black-throated Diver (*Gavia arctica*)	Priority Species	1.77 km to the SW
Chough (*Pyrrhocorax pyrrhocorax*)	Protected Species	1.77 km to the SW
Common Scoter (*Melanitta nigra*)	Protected Species & Priority Species	1.77 km to the SW
Crossbill (*Loxia curvirostra*)	Protected Species	1.77 km to the SW
Curlew (*Numenius arquata*)	Priority Species	1.77 km to the SW
Grasshopper Warbler (*Locustella naevia*)	Priority Species	1.77 km to the SW
Greenshank (*Tringa nebularia*)	Protected Species	1.77 km to the SW
Grey Partridge (*Perdix perdix*)	Priority Species	1.77 km to the SW
Hen Harrier (*Circus cyaneus*)	Protected Species, Priority Species	1.77 km to the SW
Honey-buzzard (*Pernis apivorus*)	Protected Species	1.77 km to the SW
Long-tailed Duck (*Clangula hyemalis*)	Protected Species	1.77 km to the SW
Marsh Harrier (*Circus aeruginosus*)	Protected Species	1.77 km to the SW
Merlin (*Falco columbarius*)	Protected Species	1.77 km to the SW
Red-backed Shrike (*Lanius collurio*)	Protected Species & Priority Species	1.77 km to the SW
Ruff (*Calidris pugnax*)	Protected Species	1.77 km to the SW
Serotine (*Eptesicus serotinus*)	European Protected Species & Protected Species	1.77 km to the SW
Slavonian Grebe (*Podiceps auritus*)	Protected Species	1.77 km to the SW
Spoonbill (*Platalea leucorodia*)	Protected Species	1.77 km to the SW
Stone-curlew (*Burhinus oedicnemus*)	Protected Species & Priority Species	1.77 km to the SW
Temminck's Stint (*Calidris temminckii*)	Protected Species	1.77 km to the SW
Tree Pipit (*Anthus trivialis*)	Priority Species	1.77 km to the SW
Tree Sparrow (*Passer montanus*)	Priority Species	1.77 km to the SW
Whimbrel (*Numenius phaeopus*)	Protected Species	1.77 km to the SW
Whooper Swan (*Cygnus cygnus*)	Protected Species	1.77 km to the SW
Wood Sandpiper (*Tringa glareola*)	Protected Species	1.77 km to the SW
Wood Warbler (*Phylloscopus sibilatrix*)	Priority Species	1.77 km to the SW
Wryneck (*Jynx torquilla*)	Protected Species & Priority Species	1.77 km to the SW
Brown-Banded Carder Bee (*Bombus humilis*)	Priority Species	1.82 km to the SE
Ghost Moth (*Hepialus humuli*)	Priority Species	1.82 km to the SE
Potter Flower Bee (*Anthophora retusa*)	Priority Species	1.82 km to the SE
Cornflower (*Centaurea cyanus*)	Priority Species	1.87 km to the NW
Oak Polypore (*Piptoporus quercinus*)	Protected Species & Priority Species	1.88 km to the W
Whiskered Bat (*Myotis mystacinus*)	European Protected Species & Protected Species	1.88 km to the W
Protected/notable Species (Coarse Resolution Records)		
Description	**Protection/designation**	**Record Accuracy**
A Bat (*Nyctalus/Eptesicus agg.*)	European Protected Species, Protected Species	1km
Long-eared Bat species (*Plecotus sp.*)	European Protected Species, Protected Species	1km
Marsh Tit (*Poecile palustris*)	Priority Species	1km
Pillwort (*Pilularia globulifera*)	Priority Species	1km
Scarce Four-dot Pin-palp (*Bembidion quadripustulatum*)	Priority Species	1km
Snow Bunting (*Plectrophenax nivalis*)	Protected Species	1km
Ground-pine (*Ajuga chamaepitys*)	Protected Species & Priority Species	1km
Tubular Water-dropwort (*Oenanthe fistulosa*)	Priority Species	1km, 2km, 10km
Ribbonwort (*Pallavicinia lyellii*)	Priority Species	1km, 10km
Marsh Clubmoss (*Lycopodiella inundata*)	Priority Species	1km, 10km
Crested Buckler-fern (*Dryopteris cristata*)	Priority Species	1km, 10km
Tower Mustard (*Arabis glabra*)	Priority Species	1km, 10km
Divided Sedge (*Carex divisa*)	Priority Species	1km, 10km
Caraway (*Carum carvi*)	Priority Species	1km, 10km
Red Star-thistle (*Centaurea calcitrapa*)	Priority Species	1km, 10km
Copse-bindweed (*Fallopia dumetorum*)	Priority Species	1km, 10km
Grape-hyacinth (*Muscari neglectum*)	Priority Species	1km, 10km
Corn Buttercup (*Ranunculus arvensis*)	Priority Species	1km, 10km

Annual Knawel (*Scleranthus annuus*)	Priority Species	1km, 10km
Small-flowered Catchfly (*Silene gallica*)	Priority Species	1km, 10km
Greater Water-parsnip (*Sium latifolium*)	Priority Species	1km, 10km
Marsh Stitchwort (*Stellaria palustris*)	Priority Species	1km, 10km
A Beetle (*Agonum scitulum*)	Priority Species	1km, 10km
Stinking Goosefoot (*Chenopodium vulvaria*)	Protected Species & Priority Species	1km, 10km
Starfruit (*Damasonium alisma*)	Protected Species & Priority Species	1km, 10km
Deptford Pink (*Dianthus armeria*)	Protected Species & Priority Species	1km, 10km
Pennyroyal (*Mentha pulegium*)	Protected Species & Priority Species	1km, 10km
Triangular Club-rush (*Schoenoplectus triqueter*)	Protected Species & Priority Species	1km, 10km
Grey Seal (*Halichoerus grypus*)	European Protected Species	10km
Harbour Seal (*Phoca vitulina*)	European Protected Species	10km
Interrupted Brome (*Bromus interruptus*)	Priority Species	10km
Upright Goosefoot (*Chenopodium urbicum*)	Priority Species	10km
Corn Cleavers (*Galium tricornutum*)	Priority Species	10km
Wild Candytuft (*Iberis amara*)	Priority Species	10km
Bastard Balm (*Melittis melissophyllum*)	Priority Species	10km
Grass-wrack Pondweed (*Potamogeton compressus*)	Priority Species	10km
Shepherd's-needle (*Scandix pecten-veneris*)	Priority Species	10km
Spreading Hedge-parsley (*Torilis arvensis*)	Priority Species	10km
Broad-fruited Cornsalad (*Valerianella rimosa*)	Priority Species	10km
Beaded Chestnut (*Agrochola lychnidis*)	Priority Species	10km
Mouse Moth (*Amphipyra tragopoginis*)	Priority Species	10km
Deep-brown Dart (*Aporophyla lutulenta*)	Priority Species	10km
Sprawler (*Asteroscopus sphinx*)	Priority Species	10km
Streak (*Chesias legatella*)	Priority Species	10km
Goat Moth (*Cossus cossus*)	Priority Species	10km
Spinach (*Eulithis mellinata*)	Priority Species	10km
Garden Dart (*Euxoa nigricans*)	Priority Species	10km
V-moth (*Macaria wauaria*)	Priority Species	10km
Lackey (*Malacosoma neustria*)	Priority Species	10km
Dot Moth (*Melanchra persicariae*)	Priority Species	10km
Dark Spinach (*Pelurga comitata*)	Priority Species	10km
Mullein Wave (*Scopula marginepunctata*)	Priority Species	10km
Four-spotted (*Tyta luctuosa*)	Priority Species	10km
Dark-barred Twin-spot Carpet (*Xanthorhoe ferrugata*)	Priority Species	10km
Hornet Robberfly (*Asilus crabroniformis*)	Priority Species	10km
Jersey Cudweed (*Gnaphalium luteoalbum*)	Protected Species	10km
Field Cow-wheat (*Melampyrum arvense*)	Protected Species	10km
European Water Vole (*Arvicola amphibius*)	Protected Species & Priority Species	10km
Brown Galingale (*Cyperus fuscus*)	Protected Species & Priority Species	10km
Field Eryngo (*Eryngium campestre*)	Protected Species & Priority Species	10km
Broad-leaved Cudweed (*Filago pyramidata*)	Protected Species & Priority Species	10km
Cut-grass (*Leersia oryzoides*)	Protected Species & Priority Species	10km

NB: All distances are calculated from the centre of the site, National Grid Reference: TQ 215739.
SSSI = Site of Special Scientific; LNR = Local Nature Reserve; NNR = National Nature Reserve; SPA = Special Protection Area; SAC = Special Area of Conservation; SINC = Site of Importance for Nature Conservation.
European Protected Species = species listed under *The Habitats Directive* Annexes II and IV.
Protected Species = species listed under the *Wildlife and Countryside Act 1981 (as amended)* Schedules 1, 5 and 8.
Priority Species = species listed under the *Natural Environment and Rural Communities (NERC) Act 2006* Section 41.

Field Survey

Introduction

3.6 The results of the survey are presented as a series of habitat descriptions for each of the areas on the site. The Existing Habitats Plan is shown on Figure 2 and the habitat descriptions should be read in conjunction with this Plan. Target Notes (TNs) were made on any species or features of particular importance. An indicative plant species list is attached at Appendix B (nomenclature follows Stace, 2019) and a series of site photographs attached at Appendix C.

Habitat Types and Evaluation

Developed Land/Sealed Surface

3.7 There were a number of buildings recorded on the site, including Mount Clare House, various accommodation blocks and offices, with associated hardstanding and footpaths. A description of each building has been provided in Table 5.

Table 5: Building Descriptions

Building Ref	Title	Description
B1	Mount Clare House	Two-storey masonry and stone constructed building which had been rendered and painted. A balcony was recorded at the first floor and the roof comprised pitched sections, connected by a central, flat lead roof. A basement was recorded beneath the building, with light wells at the northern end. The main entrance to the building was lined with ornamental stone columns and accessed via a curved stairway, with raised balcony above. Internally, a single roof space was recorded, which was clad with timber sarking and insulated with mineral wool. Skylights were present in the roof, with a number of low windows and air vents at each elevation, creating a well-lit interior.
B2	Picasso: private apartments/offices/reception	Two-storey building, with a masonry and glass ground floor (comprising offices and reception), with a masonry constructed first floor (comprising residential apartments). The masonry was painted white and the building had overhanging eaves at the first floor, utilised by Feral Pigeon (*Columba livia domestica*) for nesting/roosting. The private apartments were accessed via an external staircase and each had a flat, bitumen-based felt roof. A central, open-air walkway facilitated access to the apartments on the roof. Internally, no separate roof spaces were recorded, with a separate plant-room present on the roof.
B3 – B7	Accommodation	A total of five accommodation blocks, all of the same construction type, were recorded on the site. These were each two-storey masonry constructed buildings, rendered and painted white, with a flat bitumen-based felt roof. Timber barge boards were present at each elevation. Internally, no separate roof spaces were recorded, with the buildings well-lit by central skylights and an open interior within each block.
B8	Garage	A detached garage was recorded on the southern site boundary. The garage was of masonry construction and single-storey, with a flat Cement Bonded Corrugated Sheet (CBCS) roof and restricted area of timber cladding at the front elevation above an up-and-over garage door. The front of the garage was exposed, with the internal structure open to the elements and colonising common ivy (*Hedera helix*) was recorded growing at the rear and side elevations. No separate attic space was recorded.
B9	Mausoleum	A stone construction mausoleum was recorded on the south-east of the site. This was an open structure, with no door or windows. Internally, the ceiling was vaulted and domed, with no separate roof space recorded.

3.8 The buildings recorded on the site were of overall limited value for wildlife, affording only restricted nesting opportunities for birds (Feral Pigeon), due to their construction type and condition.

Habitat value: Low

Modified Grassland

3.9 Lawns were recorded between the buildings present on site, which was subject to periodic mowing. Species recorded in the lawns were typical of modified grassland and included perennial rye-grass (*Lolium perenne*), Yorkshire-fog (*Holcus lanatus*), cock's-foot (*Dactylis glomerata*), ribwort plantain (*Plantago lanceolata*), yarrow (*Achillea millefolium*), black medick (*Medicago lupulina*), daisy (*Bellis perennis*), dandelion (*Taraxacum* agg.), thistle (*Cirsium sp*.), geraniums (*Geranium spp.*) and creeping cinquefoil (*Potentilla reptans*).

3.10 The lawns, due to their periodic management, provided some foraging and sheltering opportunities for wildlife.

Habitat value: Low to intermediate

Ruderal/Ephemeral

3.11 Some areas of colonising vegetation were recorded on the site, principally at the margins, with species recorded including common nettle (*Urtica dioica*), cleavers (*Galium aparine*), spear thistle (*Cirsium vulgare*), cow parsley (*Anthriscus sylvestris*) and herb-Robert (*Geranium robertianum*).

3.12 The ruderal/ephemeral vegetation can provide some foraging and sheltering opportunities for a range of wildlife, however the lack of species diversity and restricted size reduces their overall ecological value.

Habitat value: Low to intermediate

Bramble Scrub

3.13 Colonising bramble (*Rubus fruticosus* agg.) scrub was recorded at the south-eastern and north-western site boundaries, with occasional snowberry (*Symphoricarpos albus*)[6] and common ivy also present.

3.14 The areas of bramble scrub provided some foraging and sheltering opportunities for a range of wildlife.

Habitat value: Intermediate

Bare Ground

3.15 Areas of bare ground were recorded along the southern site boundary, beneath dense foliage and as unofficial paths (desire-paths). These areas were devoid of any established vegetation, with only occasional colonising bramble, cleavers and common nettle recorded.

3.16 The areas of bare ground were of limited value for wildlife.

Habitat value: Low

Hedgerows

3.17 Two hedgerows were recorded along the northern site boundary, comprising a mixture of native and ornamental shrub species. Conifer (*Cupressaceae sp.*) was the dominant shrub species, with elder (*Sambucus nigra*), yew (*Taxus baccata*), ash (*Fraxinus excelsior*) and dog-rose (*Rosa*

[6] Snowberry is an invasive plant species noted on the London Invasive Species Initiative (LISI) as a 'species of high impact or concern present at specific sites that require attention (control, management, eradication etc.).' Therefore, an appropriate strategy should be produced and implemented to eradicate the stands of this species from the site, preventing any accidental spread to adjacent land.

canina agg.) also present. A stand of Japanese knotweed (*Fallopia japonica*)[7], a non-native invasive species listed on *Schedule 9 of the Wildlife and Countryside Act 1981 (as amended),* was also recorded within one of the hedgerows (TN 1 on Figure 2).

3.18 The hedgerows provided some sheltering and foraging opportunities for a range wildlife and bird nesting opportunities, although the dominance on non-native species reduced their overall ecological value.

Habitat value: Intermediate

Urban Trees

3.19 A number of individual trees were recorded on site and at the site boundaries. Species recorded included pedunculate oak (*Quercus robur*), cypress (*Xanthocyparis sp.*), lime (*Tilia x europaea*), horse-chestnut (*Aesculus hippocastanum*), ash, yew, black locust (*Robinia pseudoacacia*), beech (*Fagus sylvatica*), evergreen oak (Holm oak) (*Quercus ilex*), London plane (*Platanus* x *hispanica*), sycamore (*Acer pseudoplatanus*) and elm (*Ulmus sp.*).

3.20 The individual trees provided sheltering and foraging opportunities for a range wildlife and bird nesting opportunities.

Habitat value: Intermediate to high

Fauna

Badgers

3.21 No evidence of badgers or their setts was recorded on or adjacent to the site[8], with only evidence of fox (*Vulpes vulpes*) recorded on the site, including an individual fox observed sheltering beneath a dead standing tree on the north of the site.

Bats

3.22 The results of the internal and external inspections of the various buildings on the site has been detailed in Table 6 and shown on Figure 3. The majority of buildings provided **negligible** roosting opportunities for bats, due to their construction type and condition, lacking any separate roof voids and/or key roosting features.

Table 6: Visual Observations

Building Ref	Title	Description
B1	Mount Clare House	No evidence of bats was recorded. The masonry and stonework were in good condition, with no visible gaps recorded. The roof features and balcony were likewise in good condition, with only a few restricted gaps beneath roof tiles at the rear elevation recorded. Lead flashing was present on the building, well-sealed with no visible gaps recorded. A number of low, open windows and air vents led into the attic space at each elevation, which was well-lit by a number of skylights and afforded only limited opportunities for roosting bats. The basement was of masonry construction, partially lit by light wells at the northern end. Therefore, the building was assessed to provide **low** value for roosting bats, with a single follow-up bat activity survey required to confirm absence of a roost.
B2	Picasso: private apartments/offices/reception	No evidence of bats was recorded during the careful internal and external inspection, with only evidence of Feral Pigeon

[7] Japanese knotweed is a non-native invasive species listed on *Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).* Therefore, an appropriate strategy should be produced and implemented to eradicate the stand of Japanese knotweed recorded on the site. This will avoid contravention of current legislation and any long-term liability. An extract from the Environment Agency's 'Managing Invasive Non-native Plants' document has been attached at Appendix D.

[8] GIGL badger data is confidential.

		(nests/roosting birds) observed under the overhanging eaves. The masonry was well-sealed and painted, with no visible gaps recorded. Internally, there were no separate attic spaces, with the plant room located on the roof found to be dusty and cobwebbed throughout, with only rodent droppings (rat) recorded. The apartments each had well-sealed felted flat roofs, with no suitable roosting features for bats. The building, due to its construction type and condition, was assessed to provide **negligible** value for roosting bats.
B3 – B7	Accommodation	The five accommodation blocks were, all of the same construction type and in similar condition, with some water ingress to the upper floor. The masonry was in overall good condition. Timber barge boards were present at each elevation, which were generally well-sealed and tightly fitted, with any restricted gaps found to be dusty and cobwebbed throughout. Internally, no separate roof spaces were recorded, with the buildings, which were well-lit by central skylights and open interiors. The accommodation buildings, due to their construction type and condition, were assessed to provide **negligible** value for roosting bats.
B8	Garage	The masonry was in overall good condition, with any restricted gaps filled by plant matter and debris. The CBCS roof was unlined and uninsulated, with no separate roof spaces recorded. The restricted area of timber cladding at the front elevation was tightly fitted tongue and groove timber, with no gaps present. Internally, the garage was open to the elements at the front elevation, draughty and damp, with no evidence of bats recorded. The building, due to its construction type and condition, was assessed to provide **negligible** value for roosting bats.
B9	Mausoleum	The stonework was in good condition, with no gaps recorded. The structure was open to the elements, draughty and damp, with no separate roof spaces recorded and no evidence of bats. The building, due to its construction type and condition, was assessed to provide **negligible** value for roosting bats.

3.23 During the emergence/activity survey on Mount Clare House (B1) (22.07.24), no bats were recorded emerging from the building. The first bat contact was a pass by a soprano pipistrelle (*Pipistrellus pygmaeus*) at 21:16 hrs, approximately 13 minutes after sunset. Low levels of bat activity were recorded during the survey with occasional passes by soprano pipistrelle, common pipistrelle (*Pipistrellus pipistrellus*) and noctule (*Nyctalus noctula*) bats recorded.

3.24 The majority of the site, being dominated by hardstanding and set within a well-lit urban area, provided only limited foraging opportunities for bats. However, the more vegetated areas at the site boundaries, comprising ruderal/ephemeral vegetation, scrub and individual trees offer better foraging opportunities for bats, with the adjacent golf course and nearby Richmond Park providing preferable foraging habitats. The majority of trees on site were assessed under the category **NONE**, due to their restricted size, age and lack of any PRF's. However, a few trees recorded at the site boundaries, including a mature pedunculate oak, evergreen oak, ash and horse-chestnut, were assessed under the category **FAR**, due to their size, age and potential presence of PRF's (TN's 7 – 11 and 13 on Figure 2). In addition, a number of trees, with species including ash, London plane, mature pedunculate oak, unidentified dead standing trees and evergreen oak, were assessed under the category **PRF-I**, due to the presence of restricted PRF's including rot holes, woodpecker holes and peeling bark (TN's 2 – 6, 12 and 14 – 16 on Figure 2). **N.B. No trees are scheduled to be felled to facilitate the proposals, which are for renovation/modification works to the existing buildings only.**

Herpetofauna

3.25 There were no ponds recorded on the site and, therefore, no breeding opportunities for any species of amphibian. Although the site when fully operational/occupied was well-maintained and regularly mown, the lack of regular management has led to areas of grassland, ruderal/ephemeral and scrub vegetation to become established which offers some suitable terrestrial habitat for common species of herpetofauna. However, no species of reptiles were recorded on the site during the phase 2 reptile survey, with only a single shrew (*Sorex sp*.) and two common frogs (*Rana temporaria*) recorded sheltering under the refugia. The results are summarised in Table 7 and shown on Figure 4.

Table 7: Reptile Survey Results (2024)

Date	Slow-worm	Common Lizard	Grass Snake	Adder	Day Total
04.09.24	0	0	0	0	**0**
06.09.24	0	0	0	0	**0**
09.09.24	0	0	0	0	**0**
13.09.24	0	0	0	0	**0**
16.09.24	0	0	0	0	**0**
18.09.24	0	0	0	0	**0**
26.09.24	0	0	0	0	**0**

Other Wildlife

3.26 Apart from the fox, shrew and frog already mentioned and a few common species of birds, either recorded on the site or flying overhead, no other species of any note were recorded.

4.0 DISCUSSION AND RECOMMENDATIONS

4.1 The development proposals are for the use and refurbishment of the existing buildings, with associated landscaping. The majority of the established vegetation will be retained, protected and enhanced as part of the scheme.

4.2 There are no habitats of international, national, county or local importance that would be directly affected by the proposals. The site is of overall low ecological value, with the species recorded described as common or abundant and are found in similar places across much of Britain, with no evidence of protected species recorded.

4.3 A thorough internal and external examination of the existing buildings was completed, with only a single building (Mount Clare House) assessed to provide **low** value for roosting bats. The roof space was fully accessed and not complex allowing a thorough inspection, with the visual inspection supplemented with a single emergence survey completed during an optimal month. Although no evidence of bats was recorded and no further surveys are considered necessary, all site operatives should be made aware of current legislation protecting bats and their roosts. In the unlikely event of any bats being encountered on the site, then works should stop immediately and Natural England or AAe contacted so that appropriate advice can be provided.

4.4 Although the majority of the site has been assessed to provide sub-optimal terrestrial habitat for any species of herpetofauna, with only two common frogs recorded during any of the surveys conducted, it is important to note that there are some areas of suitable habitat on site and within adjacent land to the south, therefore if the site continues to be left unmanaged, there is a risk that species could colonise the site from adjacent habitats. Therefore, all site operatives should be given an induction/toolbox talk on herpetofauna so that they are aware of the possibility of encountering them and of the current legislation protecting them (a generic toolbox talk has been attached at Appendix E for reference).

4.5 Japanese knotweed is an invasive, non-native species listed under Schedule 9 of the *Wildlife and Countryside Act 1981 (as amended)*, which makes it illegal to plant or otherwise cause it to grow in the wild. Therefore, in order to avoid contravention of current legislation and any long-

term liability, a suitable strategy should be agreed and implemented to remove the stands of Japanese knotweed from the site.

4.6 In addition to the above specific mitigation measures detailed above, a series of generic mitigation measures, as detailed below, will be implemented to reduce any impact the development proposals may have on local wildlife. There is also an opportunity to implement some enhancement measures to increase the nature conservation value of the site in the long term in accordance with Government guidance as set out in National Planning Policy Framework (NPPF) 2023[9].

4.7 It should be noted that all species of wild bird and their nests are protected under the *Wildlife and Countryside Act 1981 (as amended)*. Therefore, site clearance should be timed to avoid the main bird nesting season, which, in general, runs from March to August inclusive. If this is not possible, a check should be carried out prior to any clearance works to ensure there are no active nests present.

4.8 All mammals are protected under the *Wild Mammals (Protection) Act 1996* and, therefore, prior to any site works a check should be made to make sure there are no active fox earths present on the site. The use of an animal repellent, such as Scoot, can be used to facilitate this.

4.9 In order to protect any vegetation to be retained, suitable fencing may be required at certain locations to reduce the possibility of any damage that could be caused during the works. To minimise accidental damage, any overhanging branches should be pruned back to suitable live growth points. All works should be undertaken by a suitably qualified and experienced specialist contractor and should conform to current industry best practice, i.e. BS 3998: 2010 '*Tree Work - Recommendations*'.

4.10 Any new boundary treatment should be designed to promote permeability of the site to minimize fragmentation and allow free movement of wildlife throughout the site, for example by strengthening/enhancing the existing boundary vegetation, planting up a series of new hedgerows and/or installing post and rail fences. These measures will strengthen habitat connectivity and provide additional foraging habitat, cover and nesting opportunities. If close-board fences are required for security reasons, these should be minimised and raised slightly off the ground (c. 150-200 mm) to allow animals to pass underneath.

4.11 As part of the proposals, soft landscaping will be carried out. Where any new planting is proposed it should aim to use native species, but where this is not practicable then species of known value for wildlife can be used. In particular, flowering plants will be of benefit to invertebrate species and shrubs and trees may provide nesting opportunities for birds once they become established. The existing boundary vegetation could be strengthened with supplementary planting where necessary, using native species of local provenance and/or new species rich hedgerows planted.

4.12 The site could be further enhanced by providing roosting, nesting and sheltering opportunities for a range of species and the creation of new wildlife habitats, such as some of those recommended by the Chartered Institute of Ecology Environment and Management's published Biodiversity Net Gain Good Practice Guidance, and listed below:

- Nest boxes
- Bat boxes
- Hedgehog boxes
- Log/brash piles
- Insect boxes/bee bricks
- Pollinator nest sites
- Planting wildflowers

[9] Department of Levelling Up, Housing and Communities (2023). *National Planning Policy Framework*. London.

4.13 The effects of lighting on plants and animals are difficult to assess, but it is thought that lighting can adversely affect invertebrates, birds and bats. As the site already experiences some lighting from on-site sources and neighbouring development and roads there should be no change in current light levels from the proposed works.

5.0 CONCLUSIONS

5.1 The development proposals are for the use and refurbishment of the existing buildings, with associated landscaping. The majority of the established vegetation will be retained, protected and enhanced as part of the scheme.

5.2 Ecological surveys have been carried out, supplemented by obtaining available baseline data from Greenspace Information for Greater London. The findings from the surveys and review of baseline data have provided information to assess the impact of the proposals on species and/or features of ecological/biodiversity value.

5.3 There are no habitats of international, national, county or local importance that would be directly affected by the proposals. The site is of overall low ecological value, with the species recorded described as common or abundant and are found in similar places across much of Britain, with no evidence of protected species recorded.

5.4 As proportionate and appropriate mitigation is available and deliverable, along with a range of enhancement measures to ensure that there would be no adverse impact on local wildlife that are using the site, along with control measures to be applied to ensure that there is no contravention of current legislation, there are considered to be no over-riding ecological constraints to the re-development proposals that would preclude planning permission being granted at this stage, subject to appropriately worded conditions.

243182/HRS AA Environmental Limited

December 2024

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Figures

Scale (km)

0 1 2

KEY

Site Boundary:

2 km Study Area:

Ordnance Survey Explorer™ 161

UK Location:

Rev.	Details	Drawn / Chkd.	Date

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Project
243182
Mount Clare House
Roehampton

Title
Site Location Plan

Scale	Date	Drawn	Chkd.	Drg. No.	Rev.
As shown	10.12.24	NAB	HRS	Figure 1	

UK HABS KEY

- Site Boundary*
- Developed Land/Sealed Surface*
- Modified Grassland*
- Bramble Scrub*
- Ruderal/Ephemeral*
- Bare Ground*
- Hedgerow*
- Individual Tree*
- Target Note*
- B1 — Building Reference*

* Indicative Location

Target Note Ref.	Description
TN 1	Stand of Japanese knotweed (c. 1 m²) within the northern boundary hedgerow
TN 2	Dead standing tree with peeling bark, assessed to be category **PRF-I**
TN 3	London plane tree with rot holes in trunk, assessed to be category **PRF-I**
TN 4	Group of 5 ash trees, each with at least a single rot hole in the main trunk, all assessed to be category **PRF-I**
TN 5	Ash tree, with rot hole, assessed to be category **PRF-I**
TN 6	Ash tree with woodpecker hole and rot hole, assessed to be category **PRF-I**
TN 7	Group of semi-mature trees (ash, sycamore, elm and holm-oak) clad by common ivy, assessed to be category **FAR**
TN 8	Yew tree, assessed to be category **FAR**
TN 9	Pedunculate oak tree, assessed to be category **FAR**
TN 10	Large holm oak tree, clad by common ivy, assessed to be category **FAR**
TN 11	Dead standing tree, clad in common ivy and assessed to be category **FAR**
TN 12	Pedunculate oak, with cracked bark, assessed to be category **PRF-I**
TN 13	Horse chestnut, assessed to be category **FAR**
TN 14	Pedunculate oak, with rot holes, assessed to be category **PRF-I**
TN 15	Pedunculate oak, with rot holes, assessed to be category **PRF-I**
TN 16	Pedunculate oak, with rot holes, woodpecker holes and hollows, assessed to be category **PRF-I**

Rev.	Details	Drawn / Chkd.	Date

Project

243182
Mount Clare House
Roehampton

Title

Existing Habitats Plan

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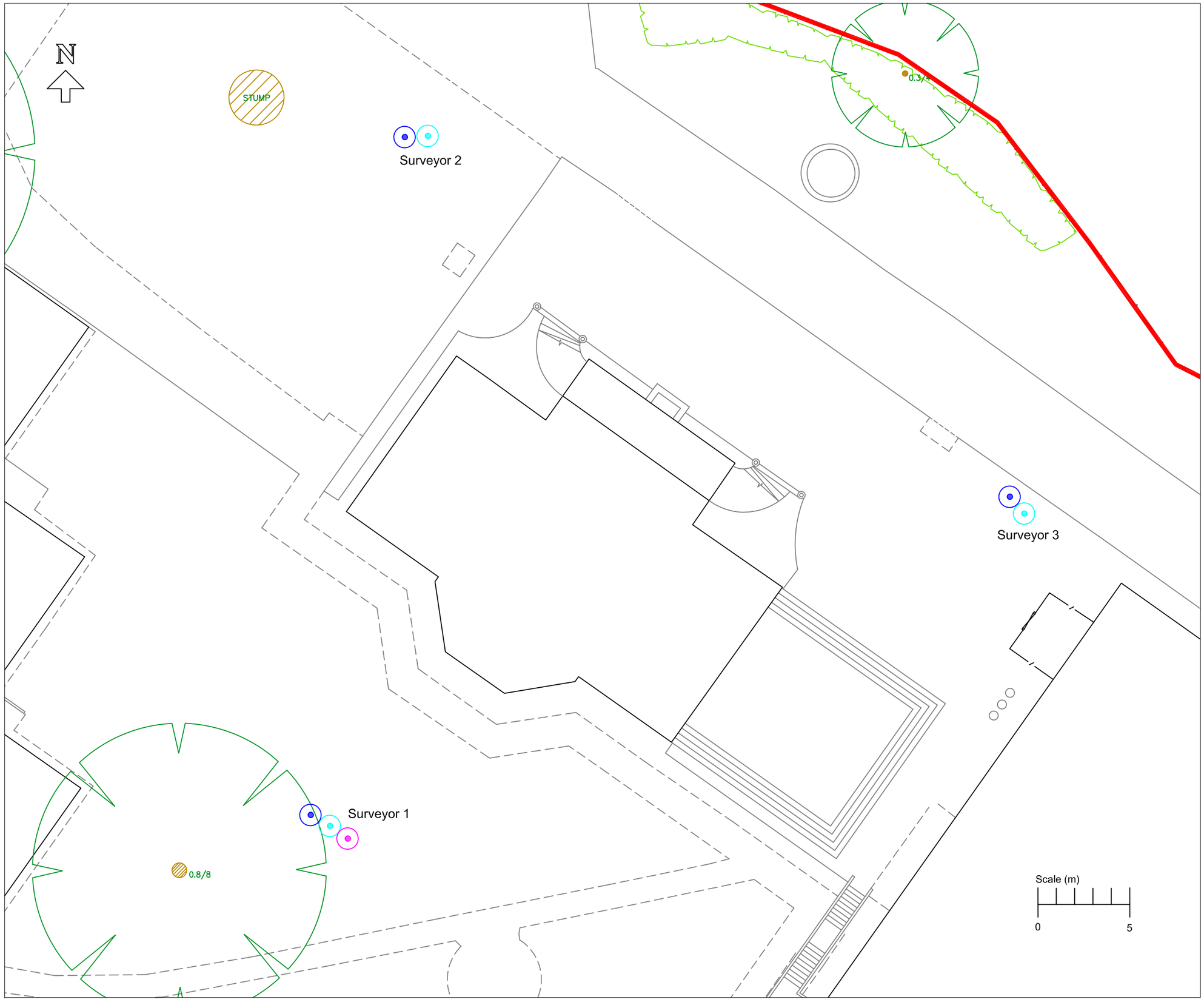
Environmental Consultants

Scale	Date	Drg. No.	Rev.
As shown	10.12.24	Figure 2	

Drawn: NAB | Chkd.: HRS



KEY

- Site Boundary*
- Individual Tree (Topographed)
- Surveyor*
- Night Visual Aid*
- Static Detector*

* Indicative Location

Notes

No evidence of bats was recorded during the initial visual inspection (12.06.24), with the site conditions remaining unchanged during the follow-up visual inspection (22.07.24). No bats were recorded emerging from Mount Clare House during the bat emergence/bat activity survey (22.07.24).

Rev.	Details	Drawn / Chkd.	Date

Project

243182
Mount Clare House
Roehampton

Title

Bat Survey Results Plan

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Scale	Date	Drg. No.	Rev.
As shown	10.12.24	Figure 3	
	Drawn: NAB / Chkd.: HRS		

KEY

Site Boundary*

Artificial Refugia*

* Indicative location

A total of 55 artificial refugia were placed around the site, within suitable reptile habitat, with no reptiles recorded during the survey.

Rev.	Details	Drawn / Chkd.	Date

Project

243182
Mount Clare House
Roehampton

Title

Artificial Refugia Location Plan

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Scale	Date	Drg. No.	Rev.
As shown	10.12.24	Figure 4	
	Drawn: NAB / Chkd.: ARB		

Appendix A

Summary of Ratcliffe Criteria

Fragility – some habitats, communities and species are particularly sensitive to environmental change and as such tend to be rare.

Rarity – the threat of loss of a particular habitat or species lends value to the organism and the site it occupies. Whether a species has rarity value is largely dependent upon the context, as a species or habitat can be internationally rare, but relatively common locally or nationally. Likewise, a nationally rare species can in some circumstances be more common at internationally level.

Size (area or extent) – size does play an important part in determining the ecological interest of an area, but is also a relative concept. For example, a 30 acre woodland or a one acre meadow could have a similar degree of nature conservation importance.

Diversity – the diversity of a site can be expressed in a number of ways and both low and high diversity can have a high nature conservation value under different circumstances.

Potential value – some sites have the potential to provide greater nature conservation interest than presently exists.

Position within the Ecological/Geographical Unit – a site which is near or adjacent to other similar habitats may have a higher nature conservation value than an isolated one because the range of fauna can be greater.

Typicalness – certain habitats have become important as they are good examples of what is, or has historically been, typical of the area. Efforts have been made to safeguard representative areas to prevent what was once common becoming fragmented or rare.

Recorded history – a well-documented site with detailed biological and/or natural history records presents a valuable insight into the ecology of a site. Such information is important for current and future management.

Naturalness – this is a measure of the degree to which an area has been modified by human activity. In England unmodified habitats are extremely rare being restricted to remote, inaccessible areas such as cliffs, and some saltmarshes. The bulk is either semi-improved, improved or artificial.

Intrinsic Appeal – this refers to value in a popular rather than ecological sense, and highlights the fact that value is also derived from society's preferences for landscape and other aesthetic features and is not just based on ecological considerations.

Appendix B

PLANT SPECIES LIST

Acer pseudoplatanus	Sycamore
Achillea millefolium	Yarrow
Aesculus hippocastanum	Horse-chestnut
Anthriscus sylvestris	Cow parsley
Bellis perennis	Daisy
Cirsium sp.	thistle
Cirsium vulgare	Spear thistle
Cupressaceae sp.	Conifer
Dactylis glomerata	Cock's-foot
Fagus sylvatica	Beech
Fallopia japonica	Japanese Knotweed
Fraxinus excelsior	Ash
Galium aparine	Cleavers
Geranium robertianum	Herb-Robert
Geranium spp.	Geraniums
Hedera helix	Common ivy
Holcus lanatus	Yorkshire-fog
Lolium perenne	Perennial rye-grass
Medicago lupulina	Black medick
Plantago lanceolata	Ribwort plantain
Platanus x *hispanica*	London plane
Potentilla reptans	Creeping cinquefoil
Quercus ilex	Evergreen oak (Holm oak)
Quercus robur	Pedunculate oak
Robinia pseudoacacia	Black locust
Rosa canina agg	Dog-rose
Rubus fruticosus agg.	Bramble
Sambucus nigra	Elder
Symphoricarpos albus	Snowberry
Taraxacum agg.	Dandelion
Taxus baccata	Yew
Tilia x europaea	Lime
Ulmus sp.	Elm
Urtica dioica	Common nettle
Xanthocyparis sp	Cypress

Appendix C

Photograph 1: Showing the front of Mount Clare House (B1).

Photograph 2: Showing the rear of Mount Clare House (B1).

Photograph 3: Showing the roof space within Mount Clare House (B1).

Photograph 4: Showing the front of the Picasso Building (B3), with associated hardstanding.

Rev.	Details	Drawn / Chkd.	Date

PROJECT

243182
Mount Clare House
Roehampton

TITLE

Photograph Record Sheet 1
(Photographs 1 to 4)

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Scale	Date	Drg No.	Rev.
NTS	10.12.24	Appendix C	
	Drawn: NAB / Chkd.: HRS		

Photograph 5: Showing one of the accommodation blocks and adjacent grassland.

Photograph 6: Showing the front of the garage (B8).

Photograph 7: Showing the mausoleum (B9) located on the south of the site.

Photograph 8: Showing a stand of Japanese knotweed located within the northern boundary hedgerow (TN 1 on Figure 2).

Rev.	Details	Drawn / Chkd.	Date

PROJECT

243182
Mount Clare House
Roehampton

TITLE

Photograph Record Sheet 2
(Photographs 5 to 8)

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Environmental Consultants

Scale	Date	Drg No.	Rev.
NTS	10.12.24	Appendix C	
	Drawn: NAB / Chkd.: HRS		

Appendix D

Fact file

Japanese knotweed

Source: NBN Gateway. Check website for current distribution

Japanese knotweed was first brought to Britain in the mid-nineteenth century as an ornamental garden plant. Since then it has caused serious problems in a range of habitats – particularly roadsides, riverbanks and derelict land – by displacing native flora and even causing structural damage. There are three species of invasive knotweed in the UK: Japanese knotweed (Fallopia japonica); giant knotweed (Fallopia sachalinensis); and hybrid knotweed (Fallopia x bohemica), which is a cross between Japanese and giant knotweed. Japanese knotweed is the most widespread and troublesome bankside species, followed closely by hybrid knotweed, which has a similarly high regeneration capacity.

Only female plants are present in the UK. Japanese knotweed forms dense clumps with fleshy, red/green shoots, 2-3m tall, which have hollow green stems with red/purple flecks. Leaves are green, heart or shield-shaped with a flat base, up to 120mm long. Creamy clusters of flowers are borne on the tips of most stems in late summer. The root system consists of rhizomes which are orange/yellow when cut.

The underground rhizome system can extend at least 7m from the parent plant, and reach a depth of 3m or more. A piece of rhizome the size of a little finger nail can grow into a new plant. The crown, located at the base of the stem, will produce new plants. The stems die back in winter and take up to three years to decompose. Japanese knotweed should not be removed from site without a waste licence.

Control

Knotweed should be cut with a single clean cut near the base of the stem. Cutting methods that produce fragments, such as flailing, should be avoided. Stems can regenerate from nodes, or fragments of nodes. If cut stem is dried until it is crisp and brown it can be burnt or disposed of as an inert waste. If stems have been pulled up, they will have fragments of knotweed crown still attached at their base. This is highly regenerative and will regrow, even after the stem has dried. Avoid pulling stems. Refer to the code of practice for their disposal.

Chemical control using a biactive formulation of glyphosate approved for use in or near water is the most effective treatment near water. Spraying both top and underside of leaves improves control. Chemical treatment is most effective when it is applied in Aug-Sept, particularly when applied to mature uncut growth. This provides the greatest surface area for herbicide to be translocated down to the rhizome. A stem injection method can be used to avoid damage to surrounding sensitive areas.

The knotweed code of practice is available on the Environment Agency website. Copies can also be requested by calling the Environment Agency National Customer Call Centre on 08708 506 506. The code was written to provide advice on the management of Japanese knotweed on development sites, but much of the advice regarding control and disposal may be useful for riparian control.

Appendix E

TOOLBOX TALK:
AMPHIBIANS

Common Toad, Common Frog, Great Crested Newt, Smooth Newt & Palmate Newt

Key Contact

AA Environmental Ltd, Units 4-8 Cholswell Court, Shippon, Oxfordshire, OX13 6HX

Tel: 01235 536042

Did you know?

- Species of common amphibian include common toad, common frog, smooth newt and palmate newt. Whereas great crested newts or **GCNs** are the largest and rarest species of newt found in the UK.
- These species can be found on a wide range of sites, including brownfield, industrial, residential and rural.
- Populations are showing a general decline.
- All amphibians require waterbodies for breeding but will spend much of their lives on land.
- For their survival, a link between a suitable breeding pond and terrestrial habitat is essential.
- During winter, amphibians will mostly hibernate on land (although young may over-winter in ponds) and may not wake up if disturbed. Furthermore, they are cold blooded and may be very slow moving when cold. This makes them vulnerable to site works, especially during the winter months.
- Unlike GCNs the four species are not protected by European law and so you do not require a Natural England licence to handle or work near them.
- **GCNs are protected by UK and European Law.** This makes it **illegal** to intentionally or recklessly kill, injure or take, intentionally or recklessly disturb whilst occupying a 'place used for shelter or protection' and protects these places against destruction.

Identification

- Smooth and palmate newts can easily be mistaken for great crested newts (GCNs) and common lizards due to their similar size, body shapes and colouring.
- On land, lizards are much faster than newts and can disappear in the blink of an eye. Newts movement however is slow and lumbered.
- Smooth and palmate newts are smaller than GCNs, growing up to 11 cm long and their skin is smooth and velvety in appearance, whereas GCN skin is warty and common lizard skin is scaly.
- Mature GCNs may grow up to about 17 cm long. Most of their skin is dark brown or black and warty in texture/appearance with a orange/yellow and black pattern on their tummy.
- Common frogs and toads look similar to each other but can be told apart by their skin. Toads have loose, warty skin and frogs have tight, smooth skin.
- All four species breed in ponds. The eggs, or spawn, of frogs and toad look like black pin heads covered in a clear jelly. Frog spawn is clustered together, whereas toad spawn forms chains.

Legislation

- All species are protected under Section 9(5) of the Wildlife and Countryside Act 1981 against being sold, offered for sale or being held or transported for sale either dead or alive, whole or part.
- **GCNs are protected by UK and European Law.** This makes it **illegal** to intentionally or recklessly kill, injure or take, intentionally or recklessly disturb whilst occupying a 'place used for shelter or protection' and protects these places against destruction.
- Common toads have been identified as a UK Priority Species, of principal conservation importance, under Section 41 of the NERC Act 2006.

Site Controls

- Although not specifically protected, in accordance with good practice, care should be taken when clearing sites or draining down ponds to ensure no species of amphibian are harmed.
- Although considered unlikely, in the event of GCNs being encountered during the works it is a legal requirement to stop work immediately and Natural England informed so that appropriate advice can be provided.
- Additional controls may be necessary if GCNs are present on site as they are legally protected by additional legislation.
- Remember, you are not expected to be an expert, **if in doubt shout and contact the relevant person.**


Adult common toad.


Adult common frog.

Female smooth newt.


Male palmate newt.

Male adult GCN.

TOOLBOX TALK:
REPTILES

Key Contact

AA Environmental Ltd, Units 4-8 Cholswell Court, Shippon, Oxfordshire, OX13 6HX

Tel: 01235 536042

Did you know?

- There are six species of reptile native to the UK, three of which are snakes and three are lizards.
- Smooth snakes and Sand lizards are very rare and are presently restricted to a few localised areas.
- Adders, Grass snakes, Common lizards and Slow-worms are widespread and found in a number of different urban and rural habitats across the UK.
- All reptiles are ectothermic. This means they rely upon the sun's heat for warmth. As a result, you may find reptiles basking in sunny places. If it becomes too warm they will seek shade, to avoid overheating.
- Reptiles movement will be slower in cooler conditions.
- Reptiles hibernate during the winter and may not wake up if disturbed. This makes them vulnerable to site works during winter months.
- Reptiles depend upon a varied habitat for survival. They need basking spots, shade, protection from predators, food resources and somewhere to hibernate!

Identification

- Reptiles may be found in a variety of habitats within a site. Most species favour scrubland, heathland or long grassland. Railway embankments are also highly favoured.
- On the right are photos of the reptiles you are most likely to encounter on a site, if any.
- Adders can be distinguished from Grass snakes by the diamond (or jagged) stripe running down the centre of their back.
- Slow-worms look a lot like a snake but are in fact legless lizards! They tend to be light brown/golden in colour, with a smooth appearance.
- Common lizards are fast-moving, but may be sighted from a distance when basking.

Legislation

- All reptile species are protected under UK law.
- This makes it **illegal** to intentionally or recklessly kill or injure and protects them against sale and transporting for sale.

Site Controls

- There is always a **risk** that as reptiles move through the habitat that they could be encountered during site works.
- **If any reptiles are encountered during works the following controls must be applied to avoid breaking the law:**

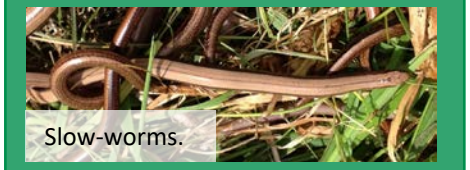
1. If reptiles are discovered/suspected works must stop **immediately**, with any reptiles left in-situ and AAe immediately contacted (contact details above).
2. During works, operatives must wear gloves in case of accidental contact with reptiles.
3. Site operative must not intentionally handle reptiles.
4. Care must be taken when moving logs, stones or rubble. These are favoured habitats for reptiles and they may be found sheltering underneath.
5. Stockpiling of materials is only permitted within designated areas. Any building materials must be stored above ground on pallets and any waste material must be placed into skips, to prevent the risk of reptiles taking refuge within them.
6. Trenches must be covered overnight to prevent animals falling into them.

These controls have been put in place to protect all site operatives from breaking the law. You are not expected to be able to identify reptiles or their presence so remember, **if in doubt shout and contact the relevant person.**


Adder.


Grass snake.


Pair of Common lizards.


Slow-worms.

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