

Our ref: HGH001-002-003-002

Ben Stonebridge
Principal Planner
Hgh Consulting
45 Welbeck Street
London
W1G 8DZ

11th February 2022

Dear Ben,

Re: Updated Ecological Information to Support a Section 73 Application relating to the First Development Site, Phase C, of the Aylesbury Estate, Southwark, London

This letter summarises our considered assessment as to the need or otherwise to undertake an updated Preliminary Ecological Appraisal (PEA) to accompany an application to amend the extant Section 73 permission (17/AP/3885) for the First Development Site (FDS) of the Aylesbury Estate Regeneration in respect of phase FDS C.

Background

Aylesbury Estate in Southwark, London is a large housing estate undergoing regeneration into a residential led mixed use development through a masterplan compliant with the policy objectives of the adopted 2010 Aylesbury Area Action Plan (AAP). The FDS is one of the phased areas of the estate within the masterplan which is further sub-divided for construction purposes into FDS A to C. Planning permission was granted for demolition of buildings and subsequent construction of the FDS on 5th August 2015 under planning permission reference 14/AP/3843. A Section 73 application was granted on 14th February 2019 (17/AP/3885) to amend the planning permission and a further Section 73 application to amend the extant permission is being prepared in respect of FDS C only. This second Section 73 application seeks to increase the number of housing units by increasing the heights of Blocks S03 and S04. It does not affect the mitigation and enhancement proposals already incorporated into the overall design.

All buildings have been demolished and the site cleared across the FDS under the extant permission. Construction has commenced on FDS A, and the works are nearing completion. Construction on FDS B commenced in November 2021 and construction on FDS C is scheduled to start in March 2023 (subject to planning permission).

The Aylesbury Estate as a whole was subject to an extended Phase 1 habitat survey and subsequent bat emergence and activity surveys in 2013 (Greengage, 2013^a and 2013^b). A PEA was conducted in June and July 2014 (WSP, 2014^a) comprising an ecological desk study and extended Phase 1 habitat survey of the whole estate to verify the ecological constraints and opportunities. This included a bat

scoping study to assess the buildings and trees on the estate for their potential to support roosting bats and this was followed up by bat activity surveys in September 2014 (WSP, 2014^b).

The desk study confirmed that the nearest statutory designated sites to the estate are Wimbledon Common Special Area of Conservation (SAC) and Lee Valley Special Protection Area (SPA), located 9.9 km to the southwest and 9.5 km to the north respectively. WSP concluded that redevelopment of the estate would not have an impact on these protected sites, due to the distance and urban nature of the intervening land. The presence of 40 non-statutory designated sites were identified within a 2 km radius of the estate, with two located immediately adjacent to the southern and eastern boundaries respectively. Burgess Park Site of Borough Grade II Importance for Nature Conservation (SBINC II) to the south is highlighted in the AAAP as an area to be revitalised as part of the Aylesbury Estate redevelopment and Surrey Square Site of Local Importance for Nature Conservation (SLINC) to the east is a small park which includes the neighbouring school's former nature area.

The extended Phase 1 habitat survey found that the estate was dominated by buildings and hardstanding with parcels of amenity grassland, scattered trees and introduced shrubs present in associated courtyard areas. The buildings, introduced shrub and scattered trees were assessed to have potential to provide suitable nesting habitat for common and widespread bird species, and starling was recorded nesting on the site. Furthermore, the bat scoping surveys undertaken in conjunction with the extended Phase 1 habitat survey, determined that the mature trees present had negligible potential to support roosting bats. However, planted areas provided areas of suitable foraging and commuting habitat for bat species. A proportion of buildings present were found to have features with potential to support small numbers of crevice roosting bats. Follow up bat surveys using automated detectors over two four to five-night periods in August and September 2014 recorded commuting and foraging activity by five different bat species across the estate in low numbers, dominated by common pipistrelle (*Pipistrellus pipistrellus*). A targeted survey of Arklow House within the FDS did not return sightings of bats emerging or returning to roost. However, it was concluded that the presence of a transitional roost of low numbers could not be ruled out.

Both reports recommended a number of avoidance and mitigation measures to safeguard Burgess Park SBINC II and Surrey Square Park SLINC, bats which may be commuting and foraging across the estate and/or roosting within Arklow House and nesting birds.. Control of invasive plant species on site was also recommended and a number of ecological enhancements. These recommendations have been adhered to throughout the demolition and construction undertaken to date and incorporated within the landscape plans for the estate post-construction.

Requirement for Updated Ecological Information

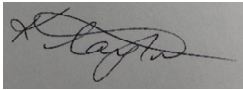
It is understood that as part of the information to be supplied in support of a proposed Section 73 application to amend the extant permission in respect of FDS C, an updated PEA has been requested as the WSP ecological desk study, extended Phase 1 habitat survey and bat surveys are now considered out of date as per industry best practice guidelines (CIEEM, 2017).

Thomson Environmental Consultants have confirmed, through discussions with Hgh Consulting and Notting Hill Genesis and photographs detailing the current condition of FDS C, that FDS C is a construction site, with no buildings remaining and all vegetation cleared. As such, an updated PEA would not provide any meaningful information as to the ecological status of the site. Furthermore, given the highly urbanised nature of the habitats present prior to demolition and clearance, and the dominance

of buildings and hard standing, it is unlikely that the recommendations for avoidance, mitigation and enhancement would change even if some remained. Furthermore, there has been no change to the surrounding area and protected sites such that amendments to the extant permission would affect local biodiversity. The original recommendations relating to avoidance and mitigation have been adhered to throughout the demolition and construction undertaken to date and those relating to the development, including enhancements, incorporated within the landscape plans for the estate post-construction. It is, therefore, our professional opinion that the conclusions of the 2014 ecological surveys remain valid and no further ecological assessments to support a Section 73 application for FDS C is required.

Please do not hesitate to contact me should you require clarification on any of the above or further information.

Yours sincerely.



Kate Taylor BSc (Hons), MSc, MCIEEM
Senior Ecological Consultant

References:


- CIEEM (2017) Guidelines for Preliminary Ecological Appraisal. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester, England.
- Greengage (2013^a) Aylesbury Estate - Ecological Extended Phase 1 Habitat and Protected Species Survey Report.
- Greengage (2013^b) Aylesbury Estate – Bat Emergence and Activity Survey Report.
- WSP UK Ltd (2014^a) Aylesbury Estate Extended Phase 1 Habitat Survey Report.
- WSP UK Ltd (2014^b) Aylesbury Estate Bat Survey Report.



Photograph 1:
The FDS C site, shown in the foreground of the photograph looking west and demonstrating its current condition as a construction site. (taken on 9th February 2022).



Photograph 2:
The FDS C site, shown in the foreground of the photograph looking west and demonstrating its current condition as a construction site. (taken on 9th February 2022).

Client	Hgh Consulting	Drawing Ref	HGH001-002-001-001/1/1		 www.thomsonec.com enquiries@thomsonec.com
Figure Number	Figure 1	Drawn	KT	Checked	
Figure Title	Photographs of the Site	Date	11/02/2022		