

Ecology Technical Note and Rebuttal to Officer's Report to Committee



Former Stanmore and Edgware Golf Centre

Planning Ref: P/3088/20

29th September 2021



**Tyler
Grange**

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Section 1: Introduction and Purpose

- 1.1. This Ecology Technical Note has been prepared by Tyler Grange Group Ltd (TG) on behalf of Sairam Holdings Ltd. It has been written in respect of the former Stanmore and Edgware Golf Centre, Brockley Hill, Stanmore HA7 4LR (hereafter referred to as the 'site'). The red line boundary of the site is shown in **Figure 1** (Section 2 of this report).
- 1.2. A planning application (ref: P3088/20) was submitted to the London Borough of Harrow in August 2020 for the demolition of the former golf club buildings on the site and construction of a single and two storey building for a banqueting facility; widening of existing vehicular access from Brockley Hill; provision of car and cycle parking and waste/recycling storage, landscape enhancement and associated works.
- 1.3. An Ecological Assessment (EA) was prepared by TG in 2020 to inform the application in August 2020. This included details of ecological surveys (phase I habitat survey and phase II surveys for bats and reptiles) and a desk study conducted in 2020 together with an assessment of likely impacts to ecological features identified considering the proposed development. A Biodiversity Impact Assessment to determine the level of Biodiversity Net Gain (BNG) achieved by the proposals was also conducted. Following amendments to the planning application including a revised planning application boundary, the EA and BNG were updated and submitted to the London Borough of Harrow in January 2021 (Baker, 2021).
- 1.4. The purpose of this note is to detail the results of an additional reptile survey conducted at the site in 2021 and to provide a rebuttal to the comments made in the case officer's report to committee in respect of the application, dated 30th June 2021 (hereafter referred to as the 'officer's report').
- 1.5. Section 2 of this report details the methodology, results and implications of the additional reptile survey conducted.
- 1.6. Section 3 of this report considers the ecological aspects of the officer's report and provides clarifications and reassurances where necessary for consideration by the committee when making a decision regarding the proposed development.



Section 2: Reptile Survey

Methodology

- 2.1 A reptile survey was originally conducted on the wider golf course in 2020 as shown on Plan 13201/P14a within the EA prepared to inform the application (Baker, 2021). However, an additional reptile survey was conducted in 2021 within the red line boundary of the site to confirm the presence/absence of reptiles within the immediate areas to be affected by the proposals, following comments within the officer’s report to committee (see Section 3).
- 2.2 The methodology implemented was in line with survey guidance published by Froglife (Froglife, 1999), whereby artificial refugia are placed within areas of suitable habitat and checked on seven subsequent occasions for the presence of reptiles. Where present, natural refugia are also checked concurrently on these survey visits.
- 2.3 In line with survey guidance, artificial refugia comprising 1m² tiles of roofing felt were placed within areas of higher potential for reptiles. 30 refugia were deployed as illustrated in **Figure 1** below on 26th July 2021.



Figure 1: Reptile refugia locations within site red line

Following a ‘bedding in’ period of 7 days, the refugia were checked on seven subsequent occasions during suitable weather conditions, as detailed in

- 2.4 **Table 1.**



Table 1: Survey metadata

Date	Time		Weather Conditions			
	Start	Finish	Temperature at start C	Temperature at end C	Cloud cover %	Precipitation
03/08/2021	10:15	11:15	15	18	80%	None
09/08/2021	10:30	12:15	16	18	70	None
16/08/2021	10:04	10:50	16	16	90	None
20/08/2021	10:00	10:49	18	18	70	None
23/08/2021	10:00	10:38	17	18	90	None
27/08/2021	10:00	10:36	17	17	40	None
31/08/2021	10:40	11:15	15	16	90	None
03/09/2021	11:04	11:50	18	18	80	None

2.5 No limitations to the surveys were noted and they were conducted in line with the guidance and required weather conditions; hence they are considered reliable.

Results and Implications

2.6 No reptiles were recorded basking on or under any artificial or natural refugia on the site during any of the survey visits. It is therefore concluded that reptiles are absent and would not be affected by the proposals.

2.7 Nevertheless, the mitigation proposed in the EA prepared to inform the planning application (Baker, 2021) in respect of common toad, hedgehogs and badgers would avoid risk of harm to any individual reptiles that might sporadically use the site. Likewise the enhancements proposed within the EA will provide an overall enhancement and may allow reptiles to colonise from nearby populations in the future.



Section 3: Rebuttal to Officer's Report

Reason For Refusal

- 3.1. The officer's report recommends refusal of planning permission and provides the following reason for refusal relating to ecology:

"The proposed development, in the absence of adequate Ecological Assessment which fails to address the sites strategic Green Belt location and the sites boundaries including its close proximity to the adjoining Pear Wood and Stanmore Country Park Site of Importance for Nature Conservation, fails to demonstrate that biodiversity value of the surrounding area would not be harmed, protected or enhanced, contrary to the National Planning Policy Framework (2019), policy G6 of The London Plan (2021), policy CS 1 E of the Harrow Core Strategy (2012) and policies DM 20 and DM 21 of the Harrow Development Management Polices Local Plan (2013)."

- 3.2. Section 6.6 of the officer's report goes on to provide context for the above reason for refusal. The current document should be read in conjunction with the officer's report, as it cross refers to the paragraphs in the officer's report dealing with biodiversity.

Consideration of Section 6.6 of Officer's Report

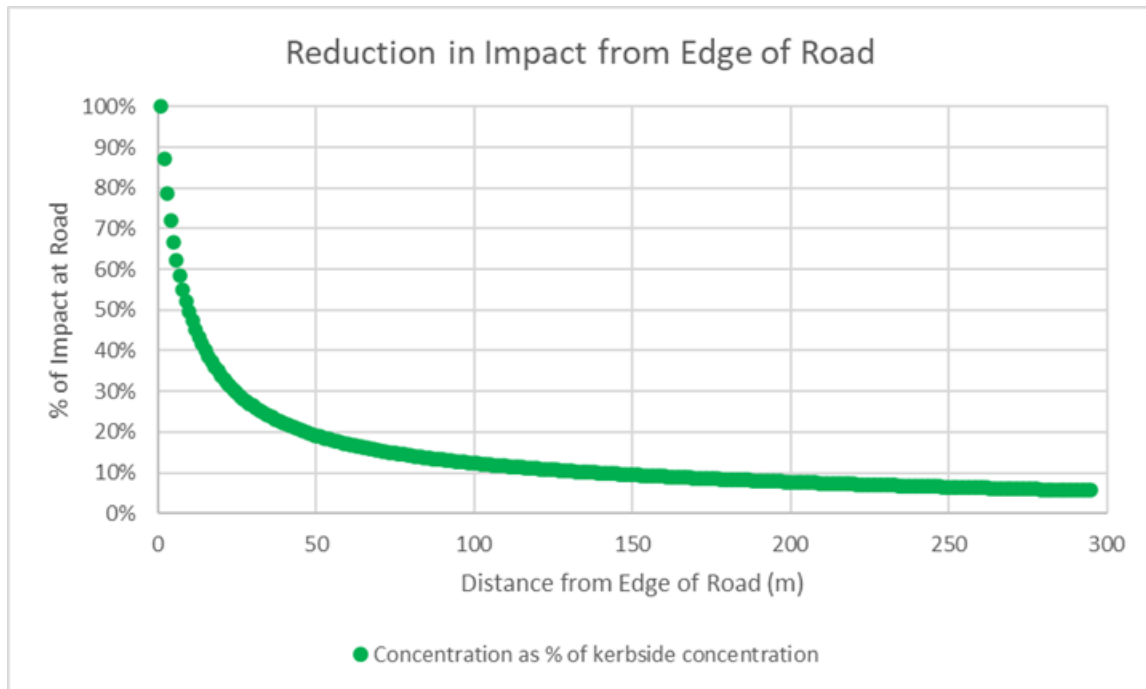
Pear Wood and Stanmore Country Park

- 3.3. Paragraph 6.6.9 refers to the Pear Wood and Stanmore Country Park Site of Importance for Nature Conservation (SINC) and Local Nature Reserve (LNR) and a need for the consideration of indirect impacts to the SINC, which is 30m to the west of the red line boundary.
- 3.4. Paragraph 4.7 of the EA (Baker, 2021, p. 23) considers indirect impacts such as the risk of increased recreational pressures or litter and screens these out as potential impacts to the SINC. The officer's report refers to a need to consider adverse impacts as a result of emissions and particulates associated with vehicle movements.
- 3.5. Whilst the boundary of the redline is within c.30m of the Pear Wood and Stanmore SINC boundary, the nearest building is approximately 60m away. The intervening area between the proposed building and the SINC boundary/woodland edge is identified for new habitat planting (see Landscape Strategy Plan within the EA – Plan 13201/P11d (Baker, 2021)) which includes proposed wildflower grassland, tree planting and an attenuation pond.
- 3.6. As discussed in paragraph 4.3 of the EA (Baker, 2021, p. 23) the potential for impacts on Stanmore Country Park Local Nature Reserve (LNR) from additional visitors using the LNR for recreation are considered to be negligible as visitors to the application site will be contained within and only use the proposed venue for discrete periods of time. There will also be no additional permanent residents on-site. The same logic can be applied to Pear Wood and Stanmore Country Park SINC.
- 3.7. In terms of the potential impacts resulting from emissions and particulates associated with vehicle movements, the proposed car park is in the same location as the existing car park facility and is approximately 110m away from the SINC boundary at its closest point. As can be demonstrated by the graph below (Fichtner Consulting Engineers), particulate emission dispersion reduces



steeply over the first 50m from a road and then levels out. The boundary of Pear Wood and Stanmore Country Park SINIC is c.110m from the closest edge of the car park. Figure 2 demonstrates that the risk of particulate emissions is therefore limited as a result of the proposals.

Figure 2: Particulate Emission Dispersion with Distance from a Road*



**This has been produced by Fichtner Consulting Engineers for a transect across an idealised A-Road using the dispersion model ADMS-Roads. This is indicative, as the exact values will depend on meteorological conditions and the local traffic conditions. There are other factors which the model cannot take into account, such as interception of pollutants by roadside trees. However, it does provide a clear visualisation of the point being made.*

- 3.8. Additionally, Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (Natural England, 2018) provides an accepted framework for the process that should be followed to assess sites protected under the Conservation of Habitats and Species Regulations 2017. Whilst the full application of the guidance would be disproportionate to a SINIC that is not protected by legislation, the principles set out can be used to screen out the need for further assessment using traffic data.
- 3.9. Step 4 of the Natural England guidance (paras 4.23 to 4.25) (Natural England, 2018) sets out the approach to using Average Annual Daily Traffic (AADT) as a proxy for potential exceedances of the critical load or critical levels associated with various particulate sources. Widely accepted Environmental Benchmarks for imperceptible impacts are set at 1% of the critical load or level, which is considered to be roughly equivalent to the thresholds for changes in traffic flow of 1000 AADT (Highways England Design Manual for Roads and Bridges (DMRB)).
- 3.10. Data from the Transport Assessment paragraphs 4.13, 5.28, 5.32, and 5.33 (EAS, 2021, p. 26 and 41) has been used to calculate the AADT figure for the predicted vehicle movements to and from the site and within the proposed car park based on car, taxi and coach movements. The data from the transport assessment has been supplemented with the assumption that on non-event days, there will be 4 vehicle movements in and out of the site per day by staff.



- 3.11. The total for the above equates to 25906 vmpa (vehicle movements per annum) which divided by 365 (days per year) equates to **71 AADT**.
- 3.12. This figure is way below the 1000 AADT threshold described above and in published guidance for screening out the need for any further detailed work for sites covered by the Conservation of Habitats and Species Regulations 2017. Due the stricter protection these sites receive under these regulations, applying the same gives sufficient confidence that any effects on Pear Wood and Stanmore Country Park SINC as a result of vehicle emissions resulting from the proposals will be imperceptible and do not require mitigation. The same can be said for retained and newly created habitats within the site and wider golf course.

Bats

- 3.13. As described in Table 3.3 in the EA, the building (referred to as B1) was identified as having low potential to support roosting bats, a classification that has not been queried by the council ecologist. A low potential building is defined by the Bat Conservation Trust (Collins, 2016, p. 35) as:
- “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 large numbers of bats (i.e. unlikely to be suitable for maternity or hibernation)”.*
- 3.14. The industry accepted survey guidance states that low potential structures should be subject to a single emergence or re-entry survey between May and August (Collins, 2016, p. 51)
- 3.15. Paragraph 6.6.10 of the officer’s report states that an adequate survey was not completed and paragraph 6.6.11 questions the timing of the survey and suggests that its scope and coverage was not appropriate.
- 3.16. As explained in paragraphs 3.48 to 3.51 of the EA (Baker, 2021, pp. 20 - 21), six surveyors were required to allow adequate observation of the potential roosting features (PRFs) on the building, and this was to be split into two survey visits to allow three surveyors to observe the PRFs on the southern aspect on one occasion and the PRFs on the other aspects of the building to be observed on a second visit by a further three surveyors.
- 3.17. The first survey was conducted on 9th June 2020 during optimal weather conditions for a bat survey (warm, dry and no wind) as described in Table 2.2 of the EA (Baker, 2021, p. 6); hence the query regarding the timing of the survey in the officer’s report is answered. As described in paragraph 3.49 of the EA (Baker, 2021, p. 21), the building suffered a fire after the initial survey preventing the second half of the survey being completed. Re-assessment of the building after the fire, as described in paragraph 3.51 of the EA (Baker, 2021, p. 21) confirmed all potential roosting features (PRF) were destroyed by the fire hence no further survey was necessary.
- 3.18. It is correct to conclude that the lack of current roosting features on the site means that the proposals for development will not have any direct adverse effect on bats, as demolition of the building in its current state will not remove any PRFs as they were destroyed by the fire; hence no bats would be expected to be present and the legislation protecting them would not be triggered. It is recognised that there is a chance a bat roost could have been present within PRFs that were not surveyed before the fire, however enhancements specified at paragraph 4.30 of the EA (Baker, 2021, p. 26) would more than compensate for the loss of PRFs and they could be controlled via a



planning condition. As such, in relation to bats, the proposals would be in line with the NPPF, policy G6 of the London Plan, policy DM20 of the Harrow Development Management Policies and policy CS1E of the Harrow Core Strategy.

Reptiles

- 3.19. Paragraph 6.6.12 and 6.6.13 of the officer's report queries the validity of the 2020 reptile survey and the conclusions drawn in the assessment.
- 3.20. The 2020 surveys were conducted in October, which is within the active period for reptiles, as recognised by industry accepted guidance (Froglife, 1999, p. 3). In addition, all surveys were conducted in suitable weather conditions and air temperatures between 9 and 18C°, when reptiles would be expected to be active as defined by best practice guidance (Froglife, 1999, p. 3) – this is set out in the Table 2.3 of the EA (Baker, 2021, p. 7). Therefore irrespective of the otherwise high levels of rainfall in autumn 2020, the results are considered to be valid and the comments regarding the validity of the survey are inaccurate.
- 3.21. Nevertheless, as described in Section 2 of this report an update reptile survey has been conducted in 2021, focused on the areas within the redline boundary of the site only.
- 3.22. There are no limitations to the update survey, which was conducted in line with published best practice at the appropriate time of year and in suitable weather conditions (see Section 2 of this report).
- 3.23. As described in paragraphs 2.6 and 2.7 of this note, it can be concluded that there would be no direct impacts on reptiles and hence no risk of engaging the protections afforded to reptiles in law and national and local policy. The precautionary methods advocated for other species (badgers, hedgehogs and common toad) within the EA would minimise risk to any individuals that could sporadically enter the site and the enhancements described in paragraphs 4.48 to 4.50 in the EA (Baker, 2021, p. 28) would result in an overall enhancement for the species which could colonise in the future.
- 3.24. These could be secured through appropriately worded planning conditions to control detailed landscape design, implementation of specific habitat enhancements for reptiles and preparation of a Construction and Environmental Management Plan (CEMP) to control precautionary methods where appropriate.
- 3.25. In respect of reptiles, the proposals are therefore in line with relevant legislation, the NPPF, policy G6 of the London Plan, policy DM20 of the Harrow Development Management Policies and policy CS1E of the Harrow Core Strategy and the Local Biodiversity Action Plan (LBAP) for Harrow (Harrow Council London, 2015) and paragraphs 6.6.12 and 6.6.13 of the officer's report are answered.

Badgers and Hedgehogs

- 3.26. Paragraph 6.6.14 of the officer's report states that there is no mention of the presence of badgers within the site and hedgehogs haven't been considered in the assessment.
- 3.27. Paragraph 3.38 of the EA (Baker, 2021, p. 17) recognises that although no setts are present within the site itself, badgers could use the site for foraging. Paragraphs 4.39 and 4.40 (Baker, 2021, p. 27)



indicates that foraging opportunities would be retained once the site proposals are operational and indicate the requirements for mitigation to avoid adverse effects to badgers during the construction phase. This could be defined within a future CEMP, to be controlled via a planning condition.

- 3.28. Paragraphs 3.61 to 3.62 of the EA (Baker, 2021, p. 21 to 22) indicated that hedgehogs have found to be present on the site and paragraphs 4.52 to 4.55 of the EA (Baker, 2021, p. 28) indicate that opportunities for hedgehog would be maintained and enhanced through appropriate detailed soft landscaping (to be conditioned) and identifies precautionary mitigation required to avoid impacts during construction. These could be specified within a future CEMP, to be controlled via a planning condition.
- 3.29. In respect of badgers and hedgehog, the proposals are therefore in line with relevant legislation, the NPPF, policy G6 of the London Plan, policy DM20 of the Harrow Development Management Policies and policy CS1E of the Harrow Core Strategy and the Local Biodiversity Action Plan (LBAP) for Harrow (Harrow Council London, 2015) and paragraphs 6.6.14 is answered.

Lighting

- 3.30. Paragraph 6.6.15 and 6.6.16 under the heading 'lighting' state that the assessment is deficient given no lighting proposals are considered and also (in a comment unrelated to lighting) indicate that the removal of a section of hedge for pedestrian access has been overlooked.
- 3.31. Paragraphs 4.34 to 4.38 of the EA (Baker, 2021, p. 26) consider impacts of lighting and requirements for a future sensitive lighting strategy. Although the incidental passes by a low number of bats recorded during the bat survey were of common species that are relatively tolerant of ambient lighting, there is a requirement for a sensitive lighting strategy to ensure opportunities for nocturnal species, including bats, are maintained. Principles for this are provided within the EA and the design and implementation of a sensitive lighting strategy could be controlled via an appropriately worded planning condition. Paragraph 6.6.15 is therefore disputed.
- 3.32. Although the loss of a section of hedgerow to facilitate a new pedestrian access from Brockley Hill is not referred to within the text of EA, this constitutes a discrete and small section of hedgerow, which has been accounted for within the BNG metric prepared for the site. The hedgerow in its entirety is of local importance and is otherwise retained and protected and loss of this small section is not considered problematic in policy terms. Nevertheless, as demonstrated in the BNG metric, there will be an overall increase in hedgerow biodiversity units as a result of the proposals through both new hedgerow planting and improved management of retained features. This could be secured via a planning condition to control the soft landscape proposals and a Landscape and Ecological Management Plan (LEMP) to ensure the condition of retained and newly created habitats is realised and maintained in the long term.
- 3.33. Overall it is therefore concluded that the points raised in paragraphs 6.6.15 and 6.6.16 can be dismissed.

Biodiversity Net Gain

- 3.34. Paragraphs 6.6.17 to 6.6.20 of the officer's report raise concerns regarding the BNG metric prepared for the site and the points raised within these paragraphs are considered in turn in below.



Table 2: Officer's report comments and rebuttal regarding BNG

Officer's report Comment		Rebuttal
<p>Paragraph 6.6.17:</p> <p>states that the metric was not supplied and that no Phase 1 map for post development is provided.</p>		<p>The full metric in Excel format was supplied with the amended EA in January 2021, however is resupplied here for perusal.</p> <p>Paragraph 5.5 of EA (Baker, 2021, p. 30) confirms that the Landscape Planting Strategy 13201/P11d also included in the EA has been used to measure post development habitats. No further mapping is considered necessary as the habitats are clearly defined in the metric and EA (Baker, 2021, pp. 30 - 31).</p>
<p>Paragraph 6.6.18 includes several bullet points:</p>	<p>Bullet 1 – extents are small</p>	<p>This is not relevant – the application boundary is the only area to which the metric needs be applied as it is the only area to be affected by the proposals. Extent of areas are small because extent of impacts are small. The % change is still relevant and indicated an increase. This is the principle upon which the DEFRA metric has been prepared and the size of the site is not of consequence.</p>
	<p>Bullet 2 – no commitments to mitigation or enhancement are made rendering the calculation uncertain</p>	<p>An appropriately worded planning condition to secure the preparation and implementation of a detailed soft landscape proposal and LEMP, building on the principles set out in the EA and Landscape Strategy Plan will ensure the output of the metric is realised. In any event, the current requirements controlled by the NPPF and local policy require an unspecified amount of net gain and the future Environment Act will require 10% gain. The proposals indicate c.20% gain; hence there is more than enough contingency to allow provision of the levels of net gain required by policy. The comment is therefore rejected.</p>
	<p>Bullet 3 – SUDs should be excluded due to receiving runoff</p>	<p>The DEFRA metric applies appropriate distinctiveness and condition assessments within its allocation of biodiversity units to various habitats features including SUDs, which by their very nature receive run off. This comment is therefore inaccurate and SUDs should always be included within metrics with the appropriate condition applied. In the case of the site the SUDs features are classified as of low distinctiveness and a 'fairly poor' target condition to reflect the intention to plant with pond edge vegetation but recognising it will receive runoff. Multi-functional green and blue infrastructure that delivers both drainage and biodiversity benefits and the approach taken are considered appropriate and proportionate and the comment is rejected.</p>
	<p>Bullets 4 and 5 – no evaluation of impacts once the site is operational and results of impacts from guests and staff</p>	<p>Potential operational impacts as a result of the proposals such as trampling and litter can be easily mitigated through implementation of a LEMP, as described in paragraph 5.8 of the EA (Baker, 2021, p. 32). It is standard practice for such a document to be secured through application of a condition on the consent and the need for this is referred to in the conclusions of the EA (Baker, 2021, p. 33). This will also ensure the target conditions as set out in the DEFRA metric can be realised. It is also worth noting that the metric itself takes account of time to reach target conditions for different habitat types which is accounted for in the allocation of habitat units in the metric. This comment is therefore rejected.</p>
<p>Paragraph 6.6.19 indicates a change in approach to the application compared to original pre-application discussions.</p>		<p>Irrespective of the discussions had at pre-application the EA and BNG metric have been prepared to inform the planning application for the works proposed within the red line boundary. Together these illustrate that the proposals can deliver enhancements and overall net gains for biodiversity, which can be secured through planning conditions. No definitive commitments to enhancements outside the red line boundary have been made and there is no national/local policy or legislative requirement for enhancements outside the red line boundary of a planning application when it is demonstrated that there would be no adverse impacts to ecological features in or outside the site boundary (as established in the EA and this note) and net</p>



	<p>gains can be achieved. As such despite disappointment expressed by the officer in the alterations to the proposals in this application, there is no legitimate policy or legislative grounding for this comment and it is rejected.</p>
<p>Paragraph 6.6.20 refers to the restriction of the red line to the areas where the development is proposed and implications in respect of the biodiversity purpose of its green belt status. It states that the proposal is contrary to the outlined policies, which in the reason for refusal are referred to as (NPPF, London Plan 2021 G6; Harrow Core Strategy CS1E and Harrow Development Management Policies DM21 and DM22.</p>	<p>Green belt is a land use status and does not infer intrinsic ecological importance and an area of very low ecological importance with little secondary supporting value to fauna can be included within green belt. Indeed, through industry approved methods advocated by the Chartered Institute of Ecology and Environment Management (CIEEM, 2018) the habitats within the red line boundary of the site have been assessed as being largely of negligible importance or importance only within the context of the site, with features of local importance limited to the native hedgerow, which is largely retained. The mitigation hierarchy (as advocated by CIEEM, 2018) has been applied whereby the site has been designed to avoid impacts to features of importance, mitigation applied to minimise impacts and compensation provided where impacts are unavoidable. This is in line with policy DM20 and secured through planning conditions to control a CEMP and LEMP.</p> <p>In consideration of the policies referred to in the reason for refusal – as demonstrated in the EA and this note – there are no grounds for suggesting the proposed development could not accord with the NPPF or the local policy requirements. In summary:</p> <ul style="list-style-type: none"> • No adverse effects to protected sites, habitats or species are predicted where proposed mitigation and enhancement is secured through appropriately worded planning conditions for detailed soft landscape proposals, a CEMP and a LEMP; • Measurable net gains for biodiversity can be delivered, the details of which can be secured through planning conditions for detailed soft landscape proposals and a LEMP • There is no obligation under national or local policy to provide benefits outside of the red line application boundary where measurable net gains are demonstrated within the site. The EA and this note demonstrate that proposals within the red line would not significantly disrupt or detract from ecological networks or corridors for wildlife with the mitigation hierarchy applied and built form focused on areas already dominated by features of negligible ecological importance. Indeed, the intrinsic biodiversity value and opportunities for wildlife on the site would be improved through habitat creation and improved management practices.



Section 4: Conclusions

- 4.1 This note provides a measured and accurate rebuttal to the comments within the officer's report regarding biodiversity and where relevant provides additional information to confirm that the proposed development accords with local and national planning policy and legislation as it relates to biodiversity. Green belt is a land use designation and does not infer ecological importance so is not relevant to the assessment of ecological impacts or a reason for refusal related to biodiversity.
- 4.2 It is concluded that there is no defensible reason for refusal attributable to impacts to biodiversity or ecological networks and the required mitigation and enhancement, including measurable net gains for biodiversity, can be secured through appropriately worded planning conditions on the planning consent.



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