1st Floor
Dean Bradley House
52 Horseferry Road
London
SW1P 2AF
Tel: 020 7261 0447
Fax: 020 7633 0811
enquiries@wildlondon.org.uk
www.wildlondon.org.uk

London Wildlife Trust

Mr. S. M. Bell
Case Officer
Planning Department
London Borough of Bexley, Civic Offices
2 Watling Street
Bexleyheath,
Kent DA6 7AT

9th December 2014

Dear Mr. Bell,

ERITH QUARRY, FRASER ROAD, ERITH
PLANNING APPLICATION REFERENCE: 14/02155/OUTM

Full planning permission for the provision of new site accesses and access roads, a 3-Form Entry Primary School (4,300 sqm GEA), 86 residential dwellings (Use Class C3) (up to a maximum of 8,926 sqm GIA) and an ecology/grassland area in Phase 1 with outline planning permission in 3 subsequent phases (with all matters reserved except for access) for up to a maximum 540sqm GEA of ancillary non-residential floorspace (Use Classes A1, A2, A3, B1 and/or D1) and up to a further 514 residential dwellings (Use Class C3) (up to a maximum of 64,505 sqm GIA) together with associated works including informal and formal open space; pedestrian and cyclist infrastructure; car and cycle parking.

London Wildlife Trust (hereafter referred to as the Trust) has concerns over the proposed development of the above site. Whilst we recognise that there may be a need for housing in the London Borough of Bexley, we believe that the proposed planning application has significant impacts on ecology, notably;

- the amount of area designated as a Site of Borough Grade I Importance for Nature Conservation (SINC);
- protected species;

In our view it will result in a net biodiversity loss, and fails to mitigate adequately against that loss.

We also believe that the current proposal provides limited biodiversity connectivity across the site and has many missed opportunities to provide a greener healthier environment, for wildlife and residents alike.

Overall, should this development go ahead as it stands it will significantly adversely impact upon the site's biodiversity value and could be considered to breach of a number of national and local policies and guidance. We therefore **strongly object** to the application and recommend that it be refused permission as it stands. Based on the above information, the Trust recommends that Bexley Council cannot make an informed decision on the impact of the proposed development on the biodiversity of the site and adjacent habitats. As such permission should be **refused** for the application as it stands, particularly on the grounds of the site designations and the potential biodiversity impacts on protected species within the development area.

Our comments on a number of points in order to elaborate our concerns are set out on the following pages.

If you wish for clarification or further details on these and the attached points, please don't hesitate to contact me.

Yours sincerely,

Tony Wileman, MCIEEM
Conservation Ecologist

ERITH QUARRY, FRASER ROAD, ERITH
PLANNING APPLICATION REFERENCE: 14/02155/OUTM

Comments by London Wildlife Trust, December 2014

Loss of Site of Importance for Nature Conservation
The entire area of Erith Quarry is designated as a Site of Borough Grade I Importance for Nature Conservation (SINC) (BxBI04 Erith Quarry)).

Erith Quarry was first designated as a SINC in November 1991 and the citation was last updated (prior to the LWT assessment) in September 2011.

London Wildlife Trust undertook a review of the SINCs in London Borough of Bexley in 2013 but despite attempts to gain access to Erith Quarry we were not granted access to the prior landowners. The site was therefore accessed from neighbouring roads. The current citation was largely (some minor grammar changes were made) unchanged by LWT due to the lack of access. The site was designated because of its mosaic of secondary woodland, scrub, ruderal communities and false-oat grass dominated grasslands. The latter are typically poor in wildflower composition, however several areas were valued as supporting several London notable plant species, abundant common butterfly species and yellow meadow ant and was considered an important habitat for breeding and foraging bird species or which two; the linnet and meadow pipit, are particularly rare in London and have declined considerably on a national level mostly due to habitat loss.

The London Wildlife Sites Board (LWSB) was established to ensure that selection of SINCs across London is carried out in a transparent and consistent way across London, and that the selection process is consistent with the current national and regional planning policy.

In their Advice Note LWSB recommends that:

> *"The Borough should secure the services of qualified ecologists to survey relevant land within the borough boundary, evaluate this land against the criteria set out in Appendix 1 of this document and provide a set of recommendations on which sites should be accorded SINC status (and at which grade).*
>
> *This can be through paid ecological consultants, preferably members of the Institute of Ecology and Environmental Management (IEEM), or natural history experts willing to survey sites in a voluntary capacity, or on the basis of up-to-date information provided by surveys undertaken for other reasons e.g. a development proposal*
>
> *Ideally this should be undertaken every 5-10 years, but it is recognised that some habitats and sites are not likely to undergo rapid change in terms of habitat and species composition and/or some parts of the borough may be undergoing more rapid change through regeneration programmes, therefore location or habitat specific surveys at different time intervals may be appropriate."* (LWSB, March 2013)

Based on this recommendations and established practice of designating and re-evaluating SINC sites in London Boroughs, it is the Trust's position that the current designation of Erith Quarry as Borough Grade I SINC is appropriate and relevant. In addition, ecological information provided as part of the planning application supports the designation and highlights the high importance of Erith Quarry for biodiversity within the London Borough of Bexley, which is demonstrated below.

In the submitted Environmental Statement Volume 3-1640454 section *Erith Quarry: Representation to the Review of SINCS in the London Borough of Bexley* report compiled by Ecology Solutions it states in section 13 that

"On the basis of the surveys undertaken to date, it is evident that the site does not support the same level of intrinsic biodiversity interest as that detailed in the site citation. It is clear that the ecological value of the site has suffered as a result of benign neglect."

in section 15:

"At the present time, the detailed baseline ecological situation at the Erith Quarry site is unknown. Without having completed further survey work to obtain representative, up-to date ecological information for the site, it is not considered that the ongoing SINC review process can accurately assess the true importance of Erith Quarry, and as such cannot comply with the requirements of Policy 7.19 of the London Plan (regional policy), in which it is stated that sites of Borough and Local importance for nature conservation should be given a 'level of protection commensurate with their importance'.

and in section 18:

"It is therefore the opinion of Ecology Solutions that Erith Quarry should not be retained as a SBG1INC as part of the review process at the present time, and that further consideration should only be given as to whether the site should be protected as a SINC once further detailed survey work at the site has been undertaken in 2014, and the true ecological situation is known."

The Trust does not accept Ecology Solutions Ltd's assessment of Erith Quarry no longer meeting Borough SINC status. We believe that the findings from a series of ecological surveys that have been undertaken as part of this planning application provide enough information for the Quarry to retain its status as Borough Grade I. The criteria for a Borough Grade I SINC, as defined by the Greater London Authority is set out in Appendix II:

With this information and documented observations taken from Ecology Solutions Ltd submitted *Ecological Assessment Interim Report* and the submitted *Invertebrate Survey* prepared by Colin Plant Associates (UK) we would like to state that Erith Quarry currently supports:

- a mosaic of woodland, scrub, ruderals and rough grassland habitat which it was originally designated for, albeit with increased scrub. The *Ecological Assessment Interim Report* goes on to state that "*significant areas of rough grassland and ruderal are still present across the site.*" The number and range of herbaceous species present would be considered high in the London context.
- a significant area of bramble scrub habitat that could be considered the largest of its type in LB Bexley. Bramble scrub is a valuable habitat in its own right and provides cover and food for a wide range of small mammals such as voles and shrews plus reptiles and amphibians. It also supports a host of breeding birds including wren, dunnock, robin, blackbird, whitethroat, lesser whitethroat, blackcap and linnet;
- 8 common butterfly species and yellow meadow ants were recorded (unfortunately numbers were not recorded);
- a range of important breeding and foraging bird species including four of 7 species listed on the citation of which one, the whitethroat (9 territories located in scrub throughout the site) is RSPB Amber Listed having undergone moderate declines in their UK populations over 25 years and another the linnet (1 pair located) is RSPB Red Listed. In addition the RSPB Amber Listed dunnock (4 pairs) green woodpecker (1 individual) and Red Listed turtle dove (1 individual), song thrush (1 pair) and house sparrow (2 pairs) were also recorded using the site.

In addition to these habitats and species the following were also recorded:

- Small areas of hardstanding and bare ground. These habitats although small can help to support reptiles and certain bee species respectively. Solitary bees of the type that use bare ground for nesting were found to be present including the nationally scarce *Lasioglossum malachurum;*
- A total of 47 invertebrate species which amounted to 12.5% of the total species inventory were found to be of conservation concern. It is noted that most of these rare species are to be found in the grassland and ruderal areas which compose of a small amount of the overall area;
- The rough grassland habitat previously unrecognised in the citation as of any quality still supported over 60 plant species of which 21 species would be associated with good wildflower meadow species and one the Bur chervil *Anthriscus caucalis* is a London notable;
- The woodland belts and scattered trees supported the London notable species stinking iris *Iris foetidissima*, which is normally associated with woodlands on calcareous soils;
- Common lizard, an increasingly uncommon reptile in London, and slow-worm were recorded. In addition, grass snakes were found during the translocation process.
- Bats including common and soprano pipistrelle, noctule and the rare brown long-eared bat were recorded from the site;

Considering that 2 out of 3 site visits during which habitat and vegetation survey was carried out, were undertaken during the sub-optimal or inappropriate time of year (September 2013 and January 2014), it is likely that floral richness of the site is not adequately represented in the survey report.

On these grounds the Trust, who have over 25 years of SINC designation work in London, believe there is significant evidence to indicate that the site is appropriately designated as a Borough I grade SINC and that, as such **still complies** with the requirements of Policy 7.19 of *The London Plan*, in which it is stated that sites of Borough and Local importance for nature conservation should be given a *"level of protection commensurate with their importance".*

Protected Species coverage
The Trust has concerns with the extent of information provided in the submitted application within the Ecological Assessment Interim Report undertaken by Ecology Solution Ltd with regard to protected species notably bats, breeding birds and reptiles. We believe that insufficient detail is provided to know if the surveys were of adequate scope to ensure that the results are comprehensive.

<u>Bats</u>
The information provided on bats is so incomplete that the Trust is concerned that should the proposed development be given planning consent, the potential for harm and/or disturbance to bats is not fully understood and could breach European regulations of protection of this group of animals.

We believe the following information is missing:
- Full details of bat activity survey visits (dates, times, weather conditions);
- Full details of the overnight bat recorder records (species recorded, times of recordings, why specific location were chosen over other areas (there are large gaps between recorder locations));
- Full details of what species where found and where they were found;
- Full details of trees checked and presence of bat valuable features found or not.

We therefore **strongly** advise that the bat species information provided is grossly insufficient to determine if bats may be harmed, disturbed or their population may be significantly affected as a result of the development proposal and thus offences under the European Habitat Regulations may occur if only the supplied information in the current Environmental Statement is considered.

Breeding birds

Although the breeding bird survey results are shown and a map is provided of where the bird species territories were located, the results state that only the 28th April and 13th May records are recorded. It does not explain why the results of the survey undertaken on the 3rd June are not included. Furthermore there is no information on whether specific birds were confirmed breeding, probably breeding or possibly breeding as typically undertaken in Breeding Bird surveys (CBC or BTO BBS and Atlas work). In our view the breeding bird survey information provided is somewhat incomplete and not as comprehensive as to inform of the breeding bird status of the site.

Reptiles

The results of the reptile surveys show that during the milder temperatures of late April and mid May 2014 numbers of common lizard (21 and 28 respectively) and slow-worm (32 and 42 respectively) were much higher than during warmer periods in late May and July. This is typical for survey results when surveys are undertaken in warmer conditions. The report states that:

> "*Completed surveys have recorded 'low' populations of both Slow-worm and Common Lizard in line with Herpetofauna Groups of Britain and Ireland (HGBI)"*[1].

However, there are few localities in Greater London that would record number in the 20s for common lizard and 30s and 40s for slow-worm on any single day so on a regional (London-wide) scale these are very high numbers and thus of significant importance.

The following information, which is necessary to assess if the survey was adequate, was not provided:

- location of reptile tins used;
- areas where reptiles were found;
- when the tins were left *in situ* and length of time period between tins placement and start of the survey.

In addition, the Trust has serious concerns with the already undertaken translocation of reptiles into a small proportion of the overall area in the northwest of the site. We believe that the information provided with regards the translocation is seriously inadequate because:

- no data on the number of reptiles collected or where they were collected from has been provided;
- no data on the potential suitability of the 1ha enclosed area to support the entire population of reptiles on the whole site (22ha) has been provided and no ongoing surveys to monitor this have been undertaken or proposed to be undertaken;

Natural England refer to the HGBI guidelines with regards to evaluating local mitigation/translocation of reptiles so as to maintain best practice and lawful standards. These state that capture effort of slow-worm, common lizard and grass snake for those with 'low' populations require a minimum 50 tins per ha and 60 suitable days as the minimum number of trapping days required to ensure complete capture when 'tinning' (the approved method) is used.

Although the 50 tins per ha recommendation was exceeded (100 tins per ha were used) there is no information on the number of collection days and it is stated that most of the site was considered clear of reptiles by 16th October 2014 after starting in July 2014. A wider area surrounding the 1ha fenced area was not considered clear which led to further temporary fencing and additional collection which took place between 16th October and November 2014 to clear this area.

Although not specifically informed for low populations, the collection of reptiles is considered best undertaken during the months of March-September inclusively so some collection was undertaken outside this time when reptiles may have been hibernating and thus not captured by 'tinning'.

[1] Herpetofauna Groups of Britain and Ireland. 1998. *Evaluating Local Mitigation / Translocation Programmes: Maintaining Best Practice and Lawful Standards*. HGBI Advisory Notes for Amphibian and Reptile Groups (ARGs).

In addition the HGBI guidelines suggests that Best Practice can be specified by a series of nine criteria.

As far as we can deduce from the submitted documentation the following five criteria have **not been met**:

- provision of a detailed method statement and site maps to third parties in advance of commencement of trapping or fencing;
- provision and free availability of a management plan including financial arrangements for appropriate habitat maintenance, in advance of commencement of translocation;
- trapping over 3 seasons (this may have not been necessary due to population size)
- site open to inspection of all trapping and release areas to third parties by prior agreement given reasonable notice;
- at least five years monitoring of release site habitats and species survival with a brief report freely available at the end of each year (this does not seem to have been proposed).

Due to all the above points, The Trust believes that the information provided on the reptile population and the translocation activities already undertaken before planning permission has been granted are inadequate and that there is no assurance that a reptile population on site would be maintained post development.

Habitat loss, species loss, mitigation and long term management

Habitat loss

From the information provided in the Ecological Assessment Interim Report it can be assessed that there is approximately the following current extent of habitats:

Scrub: 11 ha (of moderate biodiversity value)
Rough grassland and ruderal: 5 ha (of moderate biodiversity value)
Woodland belts and scattered trees: 3.5 ha (of moderate to high biodiversity value)
Stream, hard-standing and bare ground combined: 0.5ha (of low biodiversity value)

So the Quarry site can be said to currently support 19.5 ha of at least moderate biodiversity value habitat and 0.5ha of low biodiversity value.

This is proposed to be approximately replaced by the following habitats:

Rough grassland and scattered scrub: 2.5 ha (of moderate to high biodiversity value)
Amenity grassland: 1 ha (of low biodiversity value)
Planted shrubberies: 1 ha (of low biodiversity)
Planted shrubberies 0.25 ha (of moderate biodiversity)
Woodland belts and scattered trees: 0.5 ha (of low biodiversity value)
Woodland belts: 3 ha (of moderate to high biodiversity value)
Hardstanding 11.5 ha (of low biodiversity value)
Wetlands: 0.25 ha (of moderate to high biodiversity value)

which amounts to: 6ha of at least moderate biodiversity value and 14 ha of low biodiversity value habitat.

This suggests there will be a **net loss** of approximately 13.5 ha of moderate or higher biodiversity value habitat.

Species loss

Considering the habitat loss the Trust believes that this will have a profound effect on the species that currently inhabit the area and believe using sound ecological knowledge that post development:

- Bat species may be stable but the availability of food sources will be reduced (see inverts below) and some more vulnerable species like the brown long-eared bat may be lost from the site if they are present.
- Reptile populations will be severely reduced as they will be forced into a much smaller area and despite the proposed improvement of this area it is at least half the size of the current quality habitat available. It is thought (due to surrounding habitat use restrictions) that the current reptile populations are probably isolated from any nearby populations but are maintained simply because of their size and the area of habitat available. Given a smaller area the further isolation of the population and increased risk from predation (from cats and a smaller area for predators to hunt within) that the reptile population could become extinct from the site within a few years.
- Several bird species are almost certainly going to be lost from the site as breeding birds because of the lack of suitably retained undisturbed habitat, this will include whitethroat and linnet. Other species will also have a much reduced capacity to breed due to available space and disturbance. Vulnerable species like the song thrush, chiffchaff and dunnock have the potential to become extinct on site.
- Based on the invertebrate survey results the proposed post development habitats are unlikely to support the two core habitats mentioned as the those "*of greatest value to invertebrate ecology at this site"* namely; the edge zones between scrub and grassland and areas of unshaded ruderal habitat mosaics. This is because most of the scrub is proposed to be removed and the grasslands are proposed for enhancement to a richer quality leaving less ruderal habitat. We therefore conclude that the overall habitat for existing invertebrates will be greatly reduced and for some species lost entirely.

As a result the Trust believes there will be a **net loss** to species using the site post development.

Mitigation and long term management

The *Draft Ecological Mitigation and Management Plan* offers three management objectives to be undertaken post development to ensure that the retained and newly created habitats and protected species are maintained or enhanced. These along with the provision of bird and bat boxes, some SuDS areas, general enhancement works and the reptile translocation work account for the proposed mitigation for the above losses.

Despite the proposals being ecologically sound, the information provided in the Plan is scant and does not provide sufficient methodologies or timings for the long term conservation management of the site. Given that an appointed management company may not have the ecological background, knowledge, or experience to manage both the areas of amenity landscape and areas of wildlife conservation interest we are certain that this document does not fulfil the criteria for being a comprehensive management plan to manage the proposed 'ecology areas'.

Therefore we believe that the proposed mitigation is inadequate to account for the overall loss to biodiversity that is likely to occur on site.

Biodiversity connectivity

The Trust believes that the proposed development severs a number of wildlife connectivity routes for certain species that may leave them vulnerable to population loss and extinction. The species namely at threat are small mammals and reptiles that will find moving out from the proposed grasslands near on impossible due to the severing by roads and other hard standing environments isolating them from the neighbouring woodland, scrub, grassland and garden areas to the east.

Missed opportunities
There are host of missed opportunities could have provided to enhance the overall biodiversity value of the proposed development. These include:

- Provision of built in bat and bird boxes into building designs;
- Provision of green vegetated garden spaces for the houses rather than very small insignificant roof gardens and planted beds;
- Provision of connected green corridors in all directions across the site. These could amount to 2-4 metre wide strips of 'wild' vegetated areas of hedgerows, meadows and treelines without hard surfaces severing them. Shallow small tunnels could have been provided under roads, paths etc to allow mammal and reptile passage. These corridors could have also provided valuable SUDS routes through the site;
- Buildings have flat roofs that could have incorporated a mix of biodiverse green and brown roofs and some wall features could have included biodiverse green walls

Proposed Species composition
The Trust recognises that the soft landscaping plan provides only a guide to what specific species may be planted within the proposed development. However, the suggested ornamental planting proposals offer little for biodiversity. We therefore suggest some alternatives which maintain aesthetics, but in addition also benefit biodiversity particularly pollinating insects.

<u>Rustic grass and perennial beds</u>

- *Rudbeckia fuldiga* var. Goldsturm – can spread by seed and has potential to be invasive. Replace with *Doronicum plantagineum*
- *Oenothera lindheimeri* – no known biodiversity value. Replace with *Silene noctiflora*

<u>Sensory planting</u>

- *Liriope muscari* – no known biodiversity value. Replace with *Echinops ritro*

<u>Gabion Wall planting</u>

- *Akebia quinata* – potential invasive climber. Replace with *Humulus lupulus*

<u>SUDS planting</u>

- *Briza media* – generally a dry calcareous grassland species so not appropriate as a SuDS species. *Poa trivialis*
- *Festuca rubra* – generally a dry grassland species so not appropriate as a SuDS species. Replace with *Alopecurus pratensis*

<u>Proposed trees</u>

- *Robinia pseudoacacia* –This is a listed invasive species on the London Invasive Species Initiative website so should not be planted. Replace with *Fagus sylvatica*

The following trees also offer little for biodiversity, have little relevance to the landscape of Erith, and would be better replaced with native/naturalised species:

- *Liriodendron tulipifera* – replace with *Carpinus betulus*
- *Quercus palustris* – replace with *Quercus petraea*
- *Acer rubrum* – replace with *Castanea sativa*
- *Betula utilis* – replace with *Betula pubescens*
- *Prunus accolade* - replace with *Sorbus torminalis*

The woodland mix is a odd selection with species of both wet and dry environments and supports no shrub species a better mix would consist of:

- *Acer campestre*
- *Betula pendula*
- *Corylus avellana*
- *Crataegus monogyna*
- *Fagus sylvatica*
- *Malus sylvestris*
- *Quercus robur*
- *Sorbus aria*

Conclusions

London Wildlife Trust strongly believes that should the development be given planning approval as it stands that Bexley Council will have failed to follow its own Core Strategy in several of its policies namely Policy CS04; Policy CS08; Policy CS17, and Policy CS18 (see Appendix 2).

The Trust believes that should the proposed development application be approved in its current form, there will be a significant adverse impact upon the existing biodiversity, notably the almost complete loss or change of a Site of Borough Importance for Nature Conservation. In addition, the potential for maintaining or enhancing the biodiversity on site post development will be minimal.

There is also a potential that protected species such as bats, reptiles, and breeding birds and their roosts will be presented with additional pressures that over time could reduce the site's viability for their survival and thus contributing to failing to achieve biodiversity targets as set out in *The London Plan*.

Based on the above information, the Trust recommends that Bexley Council cannot make an informed decision on the impact of the proposed development on the biodiversity of the site and adjacent habitats. As such permission should be **refused** for the application as it stands, particularly on the grounds of the site designations and the potential biodiversity impacts on protected species within the development area.

London Wildlife Trust, December 2014

Appendix 1

London Borough of Bexley Core Strategy, February 2012
Relevant policies

Policy CS04 *Erith geographic region*

"The vision for the Erith geographic region will be achieved by:

c) taking opportunities for improving the quality of the natural environment through improvements to biodiversity and air quality;

h) ensuring all new development helps to address the deficit in public open space and access to nature in the area, protects or enhances biodiversity and mitigates against all types of flood risk, particularly through design solutions that incorporate flood resilience and resistance in areas at risk of flooding;

Policy CS08 *Adapting to and mitigating the effects of climate change, including flood risk management*

"All development should contribute to the delivery of sustainable development by planning for, adapting to, and mitigating the impacts of climate change, by reducing the carbon emissions related to the construction and operation of all development.
The Council will achieve this by applying the requirements and targets outlined in national and regional planning policy and guidance to new development Tthis will comprise:

i) supporting green infrastructure (e.g. green and brown roofs) and the contribution it can make, to managing flood risk and surface water, and to the mitigation of the urban heat island effect;"

Policy CS17 *Green infrastructure*

"Bexley's green infrastructure, including open spaces and waterways will be protected, enhanced and promoted as valuable resources. In particular, this will be achieved by:

e) protecting significant green corridors, and seeking opportunities to increase connectivity between the network of green spaces and habitats;"

Policy CS18 *Biodiversity and geology*

"The Council will protect and enhance its biodiversity and geological assets, whilst complying with national and regional policy and guidance by:

b) protecting, conserving and enhancing Bexley's Sites of Special Scientific Interest (SSSI) and Sites of Importance for Nature Conservation (SINC);

c) resisting development that will have a significant impact on the population or conservation status of protected species and priority species as identified in the UK, London and Bexley Biodiversity Action Plans;

d) protecting and enhancing the natural habitat as far as practicable, seeking biodiversity enhancements and improved access to nature, particularly in areas of deficiency, through new development, including new residential development and projects that help deliver the Open Space Strategy. Preference will also be given to enhancements which help to deliver the targets for habitats and species set out in the London Plan and Bexley Biodiversity Action Plan;

g) Seeking opportunities to provide for greening of the built environment, including green roofs and walls in new buildings."

Appendix 2

Criteria for identifying Site of Borough Importance for Nature Conservation Greater London Authority, 2013[2]

"Sites of Borough Importance

A1.2.6 These are sites which are important on a borough perspective in the same way as the Metropolitan sites are important to the whole of London. Although sites of similar quality may be found elsewhere in London, damage to these sites would mean a significant loss to the borough. As with Metropolitan sites, while protection is important, management of borough sites should usually allow and encourage their enjoyment by people and their use for education.*

A1.2.8 In defining Sites of Borough Importance, the search is not confined rigidly to borough boundaries; these are used for convenience of defining areas substantially smaller than the whole of Greater London, and the needs of neighbouring boroughs should be taken into account. In the same way as for Sites of Metropolitan Importance, parts of some boroughs are more heavily built-up and some borough sites are chosen there as oases providing the opportunity for enjoyment of nature in extensive built environments.

**Sites of Metropolitan Importance designation criteria for reference*

A1.2.2 Sites of Metropolitan Importance for Nature Conservation are those sites which contain the best examples of London's habitats, sites which contain particularly rare species, rare assemblages of species or important populations of species, or sites which are of particular significance within otherwise heavily built-up areas of London.

A1.2.3 They are of the highest priority for protection. The identification and protection of Metropolitan Sites is necessary, not only to support a significant proportion of London's wildlife, but also to provide opportunities for people to have contact with the natural environment.

A1.2.3.1 The best examples of London's habitats include the main variants of each major habitat type, for example hornbeam woodland, wet heathland, or chalk downland. Habitats typical of urban areas are also included, eg various types of abandoned land colonised by nature ('wasteland' or 'unofficial countryside'). Those habitats which are particularly rare in London may have all or most of their examples selected as Metropolitan Sites.

A1.2.3.2 Sites of Metropolitan Importance include not only the best examples of each habitat type, but also areas which are outstanding because of their assemblage of habitats, for example the Crane corridor, which contains the River Crane, reservoirs, pasture, woodland and heathland.

A1.2.3.3 Rare species include those that are nationally scarce or rare (including Red Data Book species) and species which are rare in London.

A1.2.5 Should one of these sites be lost or damaged, something would be lost which exists in a very few other places in London. Management of these sites should as a first priority seek to maintain and enhance their interest, but use by the public for education and passive recreation should be encouraged unless these are inconsistent with nature conservation."

[2] *Process for selecting and confirming Sites of Importance for Nature Conservation (SINCs) in Greater London*, GLA, 2013