

Mr A Seaman - Planning Inspector, London Borough of Richmond upon
Thames Local Plan Examination
c/o Charlotte Glancy
Banks Solutions
Flat 3 Stanmore House
118-120 High Street
Billingshurst
RH14 9QS

By email

20 October 2017

let.034.09030002

Dear Sir,

LONDON BOROUGH OF RICHMOND UPON THAMES LOCAL PLAN EXAMINATION – DRAFT SITE ALLOCATION SA 17: ST MICHAEL'S CONVENT, HAM COMMON

On behalf of our client, Beechcroft Developments Ltd, and further to Hearing 7 of the London Borough of Richmond upon Thames Local Plan Examination on 11 October 2017, we provide additional information in relation to Draft Site Allocation SA 17: St Michael's Convent, Ham Common in response to the Council's email. Specifically, the accompanying information relates to the proposed designation of St Michael's Convent as Other Site of Nature Importance (OSNI).

In addition to this covering letter, we submit the following:

- Rebuttal Briefing Note (dated October 2017), prepared by Ecology Solutions; and
- Ecological Assessment (including formal Habitat Survey) of St Michael's Convent (dated August 2016), prepared by Ecology Solutions.

Proposed OSNI designation

Steve Marshall, the Officer at Richmond upon Thames Council dealing with the ecological aspects of the current applications for planning permission and listed building consent at the site (LPA Refs. 16/3552/FUL; 16/3553/LBC; and 16/3554/FUL), visited the site on 12 October 2016.

During the Local Plan Examination, a second site visit took place on 5 October 2017. Attendees included Tasha Hunter, Ecology Policy and Planning Officer serving Richmond and Wandsworth Councils, Paul Losse from Salix Ecology (acting for the Council) and Jenni Morgan from Ecology Solutions (acting for Beechcroft Developments Ltd). Following this site visit, Salix Ecology prepared an Addendum (dated October 2017) to their original desktop review of the site. The Addendum suggests that the amenity lawn within the site is lowland acid grassland and therefore a habitat of principle importance.

In response to the above document, emailed to the Inspector by the Council on 10 October 2017, Ecology Solutions have prepared a Rebuttal Note (dated October 2017), which outlines that none of the characteristic species specifically noted in the Joint Nature Conservation Committee's (JNCC) 'Lowland Dry Acid Grassland' description have been recorded within the lawn north of the buildings. Paragraph 8 of the Rebuttal confirms that the lawn:

- Is not species-rich;
- Does not contain a range of plant species; and
- Does not contain any rare or notable species.

In addition, the lawn has been managed and maintained as an amenity lawn for the past 300 years and is not a natural habitat type.

Other than the acid grassland, the other key features of ecological value identified in Ms Hunter's email and the Salix Ecology Addendum are already subject to existing controls and therefore do not require any additional protection. The site is located within the Ham Common Conservation Area and, as such, the trees on site are already subject to protection by statute. Furthermore, the badgers and bats identified at the site are protected by existing legislative instruments.

The proposed OSNI designation is unsound as the Council's evidence, based on a one hour walkover survey in October, does not support it. Conversely, the Ecological Assessment prepared by Ecology Solutions (dated August 2016) and Rebuttal (dated October 2017) are based on a comprehensive survey of the site and, as such, are the best evidence before the Examination. Furthermore, the Ecological Assessment undertaken by Ecology Solutions (August 2016), following the recognised methodology, demonstrates the limited value of the former Convent's gardens, save for the trees and badgers which are already the subject of protection. The Rebuttal note clearly sets out that the grassland within the site does not meet the criteria for classification as the Priority Habitat 'Lowland Dry Acid Grassland' given the lack of species diversity or indicator species. The best evidence available therefore indicates that the site does not warrant designation as OSNI and the Plan should be subject to a minor modification to delete the designation.

Yours sincerely



George Burgess

Enc: As listed
cc: Mr Chris Thompson, Beechcroft Developments Ltd;
Ms Andrea Kitzberger-Smith, London Borough of Richmond upon
Thames Council; and



Ms Joanne Capper, London Borough of Richmond upon Thames
Council.