
ST MICHAEL'S CONVENT, HAM COMMON BRIEFING NOTE – REBUTTAL

INTRODUCTION

1. Following a site visit with Richmond Borough Council's Ecology Policy and Planning Officer and their retained Ecologist (Salix Ecology) on 5th October 2017, a 'Habitat survey of proposed Sites of Importance for Nature Conservation in the London Borough of Richmond upon Thames – 2017 Addendum' has been produced by Salix Ecology (dated October 2017), the London Borough of Richmond's Ecology Policy and Planning Officer has recommended the entirety of the St. Michael's Convent, Ham Common site should be designated as an OSNI (Other Site of Nature Importance) and specifically as a Site of Local Importance Borough Grade II (SBI2).
2. This report assesses the above recommendation to designate the site, and specifically relates to the footprint of the proposed development that comprises the existing buildings, hardstanding and amenity grassland lawn (and excludes the orchard area and amenity planting in the northern half of the site).

ASSESSMENT OF RECOMMENDATIONS

3. The SBI2 designation relates to the alleged presence of lowland acid grassland and traditional orchard, both of which are Priority Habitats. However, the proposed SBI2 designation extends to include the car park, allotments and buildings within the site. An SBI2 designation would afford the site greater ecological importance than the Ham Common, West Site of Local Importance (SLI) that lies to the south of Ham Common Road, and comprises Ham Common itself, or of the Cassel Hospital SLI that lies further south. As set out in Ecology Solutions' Ecological Assessment (August 2016), the Ham Common, West SLI is designated for '*its acid grassland, scattered trees and pond that supports the Red List and locally rare species Round-fruited Rush.*' The Cassel Hospital SLI is designated as '*Pleasant hospital grounds, with lawns of acid grassland, a fringe of woodland and an old walled garden*' and supports areas of acid grassland that include species such as '*common bent (Agrostis capillaris) and red fescue (Festuca rubra), they contain a good diversity of wild flowers typical of dry acid soils, including birdsfoot (Ornithopus perpusillus), sand spurrey (Spigularia rubra), mouse-ear hawkweed (Pilosella officinarum), cat's-ear (Hypochaeris radicata) and sheep's sorrel (Rumex acetosella)*' and none of the 'wild flowers typical of dry acid soils' noted above have been recorded within the site (as set out below).
4. Salix Ecology's 2017 Addendum states in relation to the alleged lowland acid grassland that:

“There was a relatively large area of acid grassland immediately to the north of the house. This was previously managed as a lawn through regular mowing and was incorrectly recorded as amenity grassland in the Ecological Assessment for the developer (Ecology Solutions Ltd, 2016). The sward was dominated by red fescue Festuca rubra and bent species Agrostis sp with frequent ribwort plantain Plantago lanceolata, lady’s bedstraw Galium verum and yarrow Achillea millefolium.”

5. The Ecological Assessment for the site carried out by Ecology Solutions, stated that the areas of amenity grassland (including the alleged acid grassland and other small areas of grassland within the site) include the following species:

“Perennial Rye-grass Lolium perenne, Red Fescue Festuca rubra, Creeping Bent Agrostis stolonifera and Cock’s Foot Dactylis glomerata within the sward. Herbaceous species Yarrow Achillea millefolium, Common Nettle Urtica dioica, Autumn Hawkbit Leontodon autumnalis, Common Chickweed Stellaria media, Common Field Speedwell Veronica persica, Dove’s-foot Crane’s-bill Geranium molle, Autumn Crocus Crocus nudiflorus, Ribwort Plantain Plantago lanceolata, Common Sorrel Rumex acetosa, Cyclamen Cyclamen sp., Daisy Bellis perennis, Spear Thistle Cirsium vulgare and Ground Ivy Glechoma hederacea.”

6. The Handbook for Phase 1 Habitat Survey (JNCC 2010) states specifically in relation to amenity grassland that:

“This comprises intensively managed and regularly mown grasslands, typical of lawns, playing fields, golf course fairways and many urban 'savannah' parks, in which Lolium perenne, with or without Trifolium repens, often predominates. The sward composition will depend on the original seed mixture used and on the age of the community. Herbs such as Bellis perennis, Plantago major and Taraxacum officinale may be present. If the amenity grassland has a sward rich in herbs, it may be possible to classify it as semi-improved acidic, neutral or calcareous grassland, as appropriate. In such cases, the area concerned should be mapped as the specific grassland type and its amenity use target noted.”

7. The Joint Nature Conservation Committee (JNCC) has produced Priority Habitat descriptions for all Priority Habitats, and for ‘Lowland Dry Acid Grassland’ it is stated that this Priority Habitat type is characterised by:

“a range [Ecology Solutions’ emphasis] of plant species such as heath bedstraw Galium saxatile, sheep’s-fescue Festuca ovina, common bent Agrostis capillaris, sheep’s sorrel Rumex acetosella, sand sedge Carex arenaria, wavy hair-grass Deschampsia flexuosa, bristle bent Agrostis curtisii and tormentil Potentilla erecta, with presence and abundance depending on community type and locality. Dwarf shrubs such as heather Calluna vulgaris and bilberry Vaccinium myrtillus can also occur but at low abundance. Lowland acid grassland often forms a mosaic with dwarf shrub heath, the latter being covered in the separate lowland heathland action plan. Acid grasslands can have a high cover of bryophytes and parched acid grassland can be rich in lichens. Acid grassland is very variable in terms of species richness and stands can range from relatively species-poor (less than 5 species per 4m²) to species-rich (in excess of 25 species per 4m²).”

8. As can be seen from the species recorded within the site (see paragraph 5 above), none of the characteristic species listed in paragraph 7 above are present within the grassland north of the buildings within the site. This area of grassland is not species-rich, does not contain a range of plant species, and does not contain any rare or

notable species, and the species present only indicate that the grassland is present on an acid soil, which is typical of the area.

9. In addition, birds of conservation concern that are usually associated with Lowland Acid Grassland for breeding or wintering are noted as being:

“woodlark Lullula arborea, stone-curlew Burhinus oedicnemus, nightjar Caprimulgus europaeus, lapwing Vanellus vanellus, skylark Alauda arvensis, chough Pyrrhocorax pyrrhocorax, green woodpecker Picus viridis, hen harrier Circus cyaneus, and merlin Falco columbarius.”

10. As can be seen from Ecology Solutions’ Ecological Assessment (August 2016) none of these species were recorded within the site, although within Salix Ecology’s 2017 Addendum, Green Woodpecker (an RSPB Green Listed species that is a common garden bird found throughout the UK) was noted as *‘flying within the site’*.

11. The Greenspace Information for Greater London (GiGL) has produced an Acid Grassland Resources Pack, within which is a leaflet produced by the Richmond Biodiversity Group, specific to acid grassland in the London Borough of Richmond Upon Thames. As with other descriptions of acid grassland, this leaflet states that acid grassland *‘contains a diversity of fine-leaved grasses and wildflowers such as red fescue, sheep’s sorrel, heath bedstraw and harebell’* and that *‘Richmond has the largest total area of acid grassland in Greater London where you can also find nationally scarce plants such as clustered clover, upright chickweed and autumn squill’*. As can be seen from the description of the lawn within the site, although fine-leaved grasses are present, none of the other herbaceous species mentioned are present, and the lawn does not contain a diversity of wildflowers.

12. Information received from GiGL as part of the desk study exercise has previously identified the ‘Martingales Close Convent’ (that comprises the site) site as being the habitat type ‘amenity’ with the primary use of ‘landscaping around premises’. The site is noted as having been surveyed on 2nd September 1999 and was noted at this time as being 1.82ha that comprised:

- Arable (30%, 0.55ha)
- Amenity grassland (25%, 0.46ha)
- Non- native broadleaved woodland (20%, 0.37ha)
- Bare artificial habitat (15%, 0.27ha)
- Orchard (10%, 0.18ha)

13. There is no mention of any acid grassland within the site composition, and it can clearly be seen from the above that the grassland within the site was noted as being ‘amenity grassland’. The condition assessment and habitat suitability for the ‘Martingales Close Convent’ is suggested as being to ‘create new / restore relict heath’ and ‘create new / restore relict acid grass’, although this could be true for any areas of grassland present within the London Borough of Richmond.

14. As can be seen from the MAGIC website, there are vast areas of the Priority Habitat acid grassland present within Richmond, including Richmond Park SAC / SSSI (see Appendix 1). In addition, during the site visit, Richmond Borough Council’s Ecology Policy and Planning Officer stated that there are large areas of acid grassland present in the area and that it was common for Richmond. The citation for Richmond Park SSSI states the acid grassland includes the following species:

“The dominant grasses are brown bent Agrostis canina var, montana; sheep’s fescue Festuca ovina and wavy hair-grass Deschampsia flexuosa. Heath-grass Danthonia decumbens, a species of dry grassy heaths, is also present, as is mat grass Nardus stricta which, although locally abundant within the park, is uncommon in London as a whole. Several typical herbs of this habitat occur including tormentil Potentilla erecta and heath bedstraw Galium saxatile. There is, in addition, a significant population of the upright chickweed Moenchia erecta,”

15. None of the above species are present within the site.
16. Cranfield University’s Soilscales website (<http://www.landis.org.uk/soilscales/#>) has identified the site and surrounding area as being on ‘freely draining slightly acid loamy soils’, with the general habitats for this soil type being ‘neutral and acid pastures and deciduous woodlands; acid communities such as bracken and gorse in the uplands’. The area containing Richmond Park SAC / SSSI has been identified on this website as being on ‘slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils’ and ‘naturally wet very acid sandy and loamy soils’ with the typical habitats for this soil type being ‘seasonally wet pastures and woodlands’ and ‘mixed dry and wet lowland heath communities’ respectively. This highlights the fact that acid grassland could be created anywhere on these soil types, and it is not specific to the site.
17. In addition, three borehole tests were carried out on the lawn area as part of Southern Testing’s ‘Desk Study & Preliminary Site Assessment Report’ (dated August 2016), and this has identified the topsoil in this area as being generally clay / silt topsoil on a sand / flint gravel base. The pH of the site is noted as ranging between 5.2-7. Boreholes 3, 4 and 6 within the lawn are noted as having pH values of 5.7-5.9 (no value is given for borehole 3) while the borehole (number 5) taken from the very southeastern corner of the lawn adjacent to the buildings is noted as having a pH value of 5.2. The JNCC’s description for the Priority Habitat ‘Lowland Dry Acid Grassland’ states that ‘Lowland acid grassland typically occurs on nutrient-poor, generally free-draining soils with pH ranging from 4 to 5.5 overlying acid rocks or superficial deposits such as sands and gravels’ and although the soils within the site are present on a sand / gravel substrate, the pH level of the vast majority of the lawn area is not acidic enough to meet the Lowland Dry Acid Grassland description.
18. There are no numerical thresholds for designation of a SINC (which include Sites of Borough Importance) but instead sites are assessed using professional judgement.
19. Salix Ecology’s 2017 Addendum includes a table setting out each of the SINC selection criteria and provides a commentary on whether the site meets each of these criteria. This table is recreated below, and Ecology Solutions’ commentaries have been included, based on surveys of the site and results of the desk study exercise.

SINC Selection Criteria	Salix Ecology’s Comments	Ecology Solutions’ Comments
Representation	<i>Typical of older religious establishments (retreats, convents etc) with gardens.</i>	The habitat types are typical of urban and garden areas, are not rare in a local or national context.
Habitat Rarity	<i>An old orchard and lowland acid grassland present – habitats of principal importance in England, the 300 year old mulberry tree</i>	The habitats are generally species-poor and support no rare species or important populations of species. As set out within Ecology Solutions’

	<i>could be considered ancient.</i>	Ecological Assessment (August 2016), the orchard area is considered to be of moderate quality (rather than excellent / good quality) and indeed that <i>'the amenity planting at the boundaries of the site are not considered to represent Traditional Orchard, as these areas comprise semi-mature / mature trees, including non-native trees, and amenity planting, with no orchard trees present'</i> . As such, the area identified on the MAGIC website is not a true representation of the extent of orchard within the site. In any event the orchard area is not scheduled for removal and there are policies within the Local Plan that protect such habitat features.
Species Rarity	<i>Of local note are badgers and bat species including daubenton's.</i>	No rare species or important populations of species are present within the site. It is unclear from Salix Ecology's 2017 Addendum where the record of Daubenton's bat flying over the site has come from. As set out within Ecology Solutions' Ecological Assessment (August 2016), the nearest record of a Daubenton's bat returned as part of the GiGL desk study exercise was from 0.6km northwest of the site, while the specific surveys for bats carried out by Ecology Solutions recorded only Common Pipistrelle, Soprano Pipistrelle, Noctule and Serotine bats from within the site. Badgers are present within the site, although this is not an uncommon species in Richmond, and none of the setts are considered to be main setts.
Habitat Richness	<i>Average, contains scattered trees, an orchard, lowland acid grassland, semi-improved neutral grassland and small ponds</i>	The habitats are generally species-poor, and as set out above, it is not considered the amenity lawn could be classed as the Priority Habitat Lowland Dry Acid Grassland.
Species Richness	<i>Average to rich, a good range of trees and birds has been recorded as well as amphibians and invertebrates.</i>	The site is considered to be of average species-richness for a mature garden, with the amenity grassland lawn, amenity planting and allotments are considered to be species-poor / of little ecological value. The hardstanding and buildings are of negligible ecological value. It is unclear where Salix Ecology's records for <i>'forty five species of birds'</i> have been obtained from, with only a small number of species recorded by Ecology Solutions during specific surveys, and the nearest records of birds returned as part of the desk study exercise being 0.4km away. As can be seen from the desk study results, a single record of Common Frog <i>Rana temporaria</i> (a common species that

		is protected under Section 9(5) of the Wildlife and Countryside Act 1981 from sale only) was returned from the site, although its presence within the site should not be a reason for designation. A single record for Stag Beetle Stag Beetle <i>Lucanus cervus</i> (a Priority Species) was also returned from the site, although this species is common in the local area and suitable habitat for this species is easily retained within the development proposals. Both of these species were only recorded in 2001 (16 years ago).
Size	<i>1.54 ha (small)</i>	The site as a whole is fairly large for a garden, although is small in relation to SINC.s.
Important Populations of Species	<i>None known</i>	No important populations of species are present within the site.
Ancient Character	<i>300 year old Mulberry tree</i>	There is evidence the site has been a private garden area for around 300 years, with a Black Mulberry and vine from this period and some of the buildings are listed.
Recreatability	<i>Mostly not recreatable within a human life time</i>	The majority of habitats within the site (the lawn as well as the surrounding buildings, hardstanding, amenity planting and allotments) are easily recreatable in the short-term (no more than a few years). The orchard would be recreatable in the medium term, while the mature trees would be recreatable in the long term. However, it should be noted that the orchard is not scheduled for removal within the development proposals.
Typical Urban Character	<i>Not typical</i>	The site is considered to be generally typical of a large, mature garden.
Cultural or Historic Character	<i>There is a 300 year old vine and black mulberry tree on site, Orford House is listed and of a similar age.</i>	See 'Ancient Character' above. The Black Mulberry is subject to a TPO order and is therefore already protected, while the remainder of the trees are covered by conservation area protection. The site is not considered to be semi-wild and has been managed as a garden for the past 300 years.
Geographic Position	<i>This site is an important part of the River Thames to Richmond Park Green Corridor.</i>	The site is in an urban setting, with roads on three sides and is surrounded on all sides by residential development. It can be seen on Ecology Solutions' Plan ECO1 'Site Location and Ecological Designations' (see Appendix 2), that has been adapted from the 'SINC and Open Spaces' maps, provided by GiGL as part of the desk study exercise, that a small section of 'green corridor' lies to the west of the site, and this corresponds with The Copse, Holly Hedge Field and Ham Avenue Site of Borough Importance Grade 2 (SBI2). As set out in Ecology

		Solutions' Ecological Assessment (August 2016), this SBI2 ' <i>lies around 10m west of the site boundary</i> ', and this separation can be clearly seen in Appendix 2. Within the citation for this SBI2, it is noted that ' <i>Also included in the site are the historic avenue leading north to Ham House and, to the south, the horse ride leading from Holly Hedge Field to Ham Common</i> ', which corresponds with the 'green corridor' mentioned above. The 'River Thames to Richmond Park Green Corridor' does not exist as a defined area or site, although it is considered that Salix Ecology may be referring to the 'horse ride' noted above, and as such this 'River Thames to Richmond Park Green Corridor' does not lie within or even adjacent to the site, but is separated from the site by a residential back garden and tennis court.
Access	<i>None</i>	Private and inaccessible by the public
Use	<i>Convent, but in the process of development as a retirement home</i>	The site is inaccessible by the public and has been for the past 300 years, and has been used as a private garden and allotment during this time.
Potential	<i>Would have great potential as a limited access public open space</i>	There is potential for the orchard area and amenity planting in the northern half of the site to be enhanced through habitat management, such as replacement of amenity species with native species, and management of the orchard and associated grassland with a sympathetic regime.
Aesthetic Appeal	<i>Was a regular retreat frequented by the public by prearrangement up until summer 2016.</i>	The aesthetic appeal is as a mature garden with allotments (including flower beds).
Geodiversity Interest	<i>None known</i>	There is no known geodiversity interest within the site.

Table 1. SINC Selection Criteria

20. Overall, given the above, it is considered that the site does not warrant designation as a SINC (as an OSNI or specifically as an SBI2). Indeed, in relation to the Cassel Hospital SLI to the south of the site, as can be seen from the above, the site itself does not support any of the 'wild flowers typical of dry acid soils' that are noted within the citation for this SLI as the site does not support the Priority Habitat of Lowland Dry Acid Grassland, and as such it is queried why the site should be afforded a higher level of ecological protection than this SLI.
21. With regards to the recommendations set out in Salix Ecology's 2017 Addendum, it is stated that the site '*supports a good range of habitats within a relatively small area providing habitat for foraging and possibly roosting bats, invertebrates and amphibia*' and that there is also '*potential bird nesting and reptile habitat*'. The points relating to bats, invertebrates and amphibia are set out in Table 1 above. With regards to nesting birds, it is set out in Ecology Solutions' Ecological Assessment (August 2016) that '*the hedgerows, trees and to a lesser extent the amenity planting within the site offer suitable nesting and foraging habitats for a number of common bird species*'. It

is not considered the habitats to be lost to the development proposals offer suitable opportunities for reptiles, given their well-managed and amenity nature.

22. Salix Ecology's 2017 Addendum goes on to reiterate that they considered there to be *'two habitats of principal importance within the site, lowland acid grassland and traditional orchards'*, and as stated above, it is not considered the amenity grass lawn could be classified as the Priority Habitat Lowland Dry Acid Grassland, and the orchard area has been assessed as being of only moderate quality. In any event, the orchard area is to be retained within the development proposals.
23. Salix Ecology's 2017 Addendum again makes reference to the 'River Thames to Richmond Park Green Corridor' and this having been identified as part of a desktop study, although no designated such area or site is referenced within the information provided to Ecology Solutions by GiGL as part of the desk study exercise, and indeed no such area exists the local plan. Salix Ecology's 2017 Addendum states that *'forty five species of birds have been recorded using the site including song thrush, house sparrow, tawny owl, sparrowhawk, kestrel and cuckoo (some of which are Red List species)'*, although as set out above, it is unclear where these records have been obtained from as there is no evidence of this within the desk study results obtained from GiGL by Ecology Solutions (with only a small number of bird species were recorded within the site during Ecology Solutions' surveys). Salix Ecology's 2017 Addendum also goes on to again state that *'a number of bats also commute across the site including Daubenton's bat'*, and as set out above, this species has not been recorded within the site during Ecology Solutions' surveys, and it is unclear where this observation has been obtained from.
24. It is noted in Salix Ecology's 2017 Addendum that *'a number of species records were returned from the GiGL data search e.g. birds included house sparrow, swift, song thrush, starling and dunnock. Unspecified bat species were recorded including pipistrelle; there were several records of badger and hedgehog. Common shrew, stag beetle and common frog were also noted. There is a reasonable possibility that all these species reside on site'*. The majority of these species were recorded from the area around the site, with only Pipistrelle (Common and Soprano) and Badgers recorded within the site during Ecology Solutions' surveys, while single records of House Sparrow, Song Thrush, Hedgehog, Stag Beetle and Common Frog were returned from the site itself in 2001 (16 years ago). No more recent records of these species have been returned for within the site, and no records of Common Shrew were returned from the site itself.
25. The final paragraph of Salix Ecology's recommendations state that *'if the site is developed there is a risk that the green corridor it sits within will be seriously fragmented. It is recommended that this important site be designated as Borough Grade 2 SINC'*. As also set out above, the referenced 'green corridor' does not appear to exist, although assuming the 'green corridor' is referring to the 'horse ride' that comprises part of The Copse, Holly Hedge Field and Ham Avenue SBI2, this is separated from the site by a residential garden, and the site neither lies within or adjacent to this SBI2. As such, any development proposals would not affect the integrity or function of this 'green corridor' and as such it could not be 'seriously fragmented'.
26. It should also be noted that the site remains private, and the development proposals offer the opportunity to manage the retained orchard and tree habitats for the benefit of wildlife, such as through sympathetic management regimes and enhancement with native species. In any event, if the site is designated as a SBI2, and therefore no

development comes forward, the ecological interest of the site will be lost over time, in particular if the owner decides to bring the gardens back into formal management. If the site is left unmanaged, the habitats will likely degrade over time and become dominated by scrubby species, with non-native species such as False Acacia becoming prevalent.

SUMMARY

27. As can be seen from the above, the grassland within the site does not meet the criteria for classification as the Priority Habitat 'Lowland Acid Grassland' given the lack of species diversity or indicator species, although it is considered that the grassland is present on a mildly acidic soil. The grassland has been managed and maintained as an amenity lawn for the past 300 years, and is not a natural habitat type, but is typical of the area. It is queried whether the lawn within the site is designated as a SBI2, should all other lawns in the Ham Common area that lie on the same soil type be similarly classified as Priority Habitats and designated as SBI2s?
28. It should also be noted that during the site visit, Salix Ecology's ecologist was unable to identify Broad-leaved Willowherb (the most widespread Willowherb in the British Isles) and as such this casts doubt as to the ability of Salix Ecology to evaluate habitats that would require botanical expertise.
29. The proposed development of the site includes the loss of the ecologically less valuable habitats (buildings, hardstanding, amenity grassland, amenity planting and allotments) and protects the habitats of greater ecological value (orchard and semi-mature / mature trees). The development of the site will allow the retained habitats to be managed specifically for the benefit of wildlife, as set out above, and could result in an overall ecological gain. In addition, the green corridor linking the River Thames to Richmond Park would be retained within the proposed development and its function as a green corridor would not be comprised.

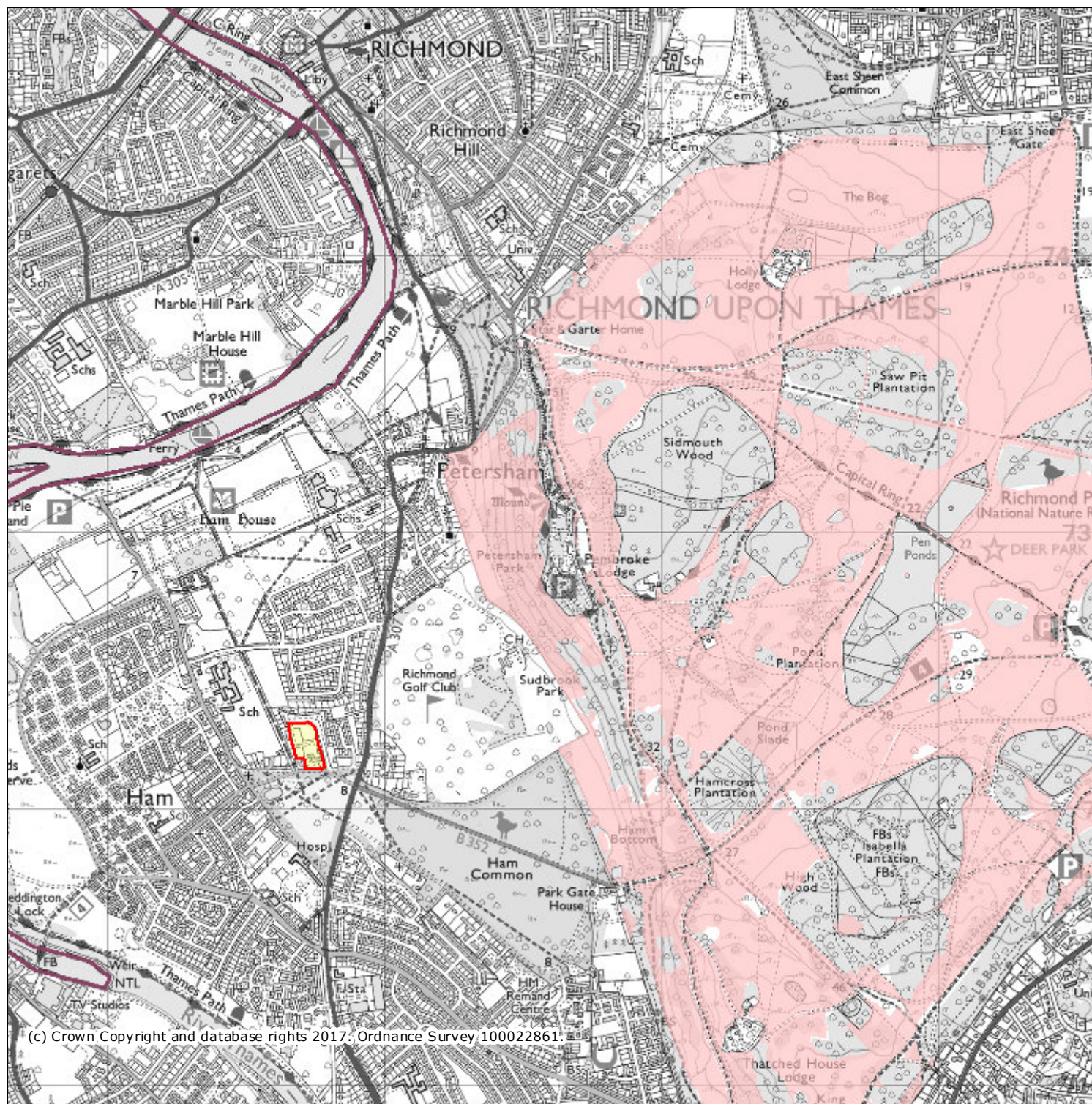
CONCLUSIONS

30. In conclusion, it is not considered that the grassland within the site constitutes the Priority Habitat of Lowland Dry Acid Grassland, but is an area of amenity grassland lying on a mildly acidic soil that has been managed as a lawn for the past 300 years and only recently been left to grow freely. It is also not considered that the buildings, hardstanding, allotments or amenity planting within the site are of such value that they warrant designation as a SBI2. Given the above, it is considered unreasonable to designate the site as a SBI2.
31. It is considered that the approach adopted by Richmond Borough Council's Ecology Policy and Planning Officer and Salix Ecology lowers the bar for ecological value in the Borough to meaningless, where buildings and hardstanding can be considered as being ecologically valuable. Should the site be designated as a SBI2, this opens the door for potentially any garden in the Borough to be designated, and devalues sites of true ecological value.

APPENDICES

APPENDIX 1

Information Downloaded from MAGIC – Acid Grassland



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Legend

Priority Habitat Inventory - Lowland Dry Acid Grassland (England)



Projection = OSGB36

xmin = 513600

ymin = 170300

xmax = 523600

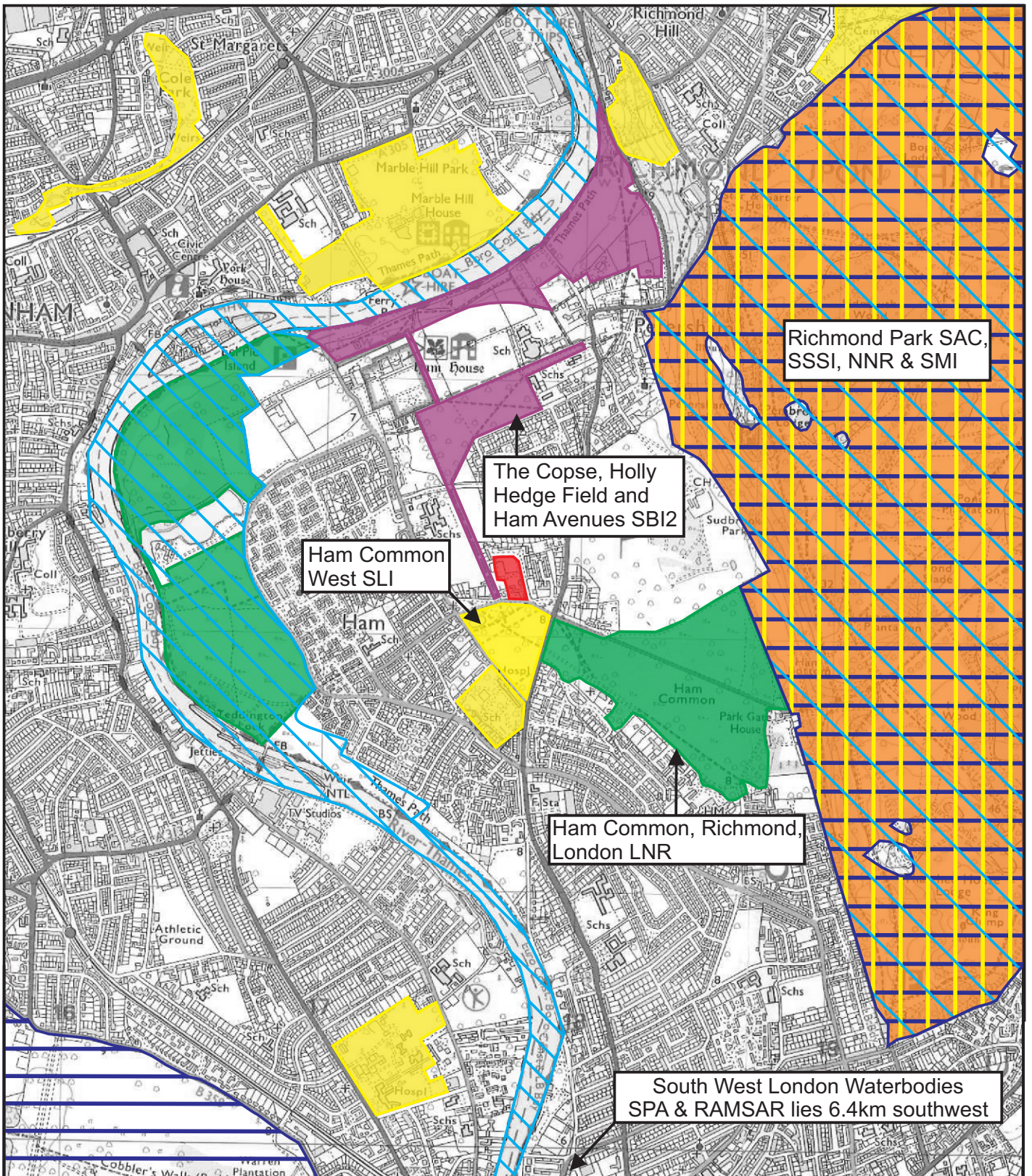
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Map produced by MAGiC on 11 October, 2017.









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APPENDIX 2

Plan ECO1 – Site Location and Ecological Designations



KEY:

-  SITE
-  SPECIAL AREA OF CONSERVATION (SAC)
-  SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)
-  NATIONAL NATURE RESERVE (NNR)
-  LOCAL NATURE RESERVE (LNR)
-  SITE OF METROPOLITAN IMPORTANCE (SMI)
-  SITE OF BOROUGH IMPORTANCE GRADE 2 (SBI2)
-  SITE OF LOCAL IMPORTANCE (SLI)



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6908: HAM COMMON,
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PLAN ECO1: SITE
LOCATION AND ECOLOGICAL
DESIGNATIONS