

# Preliminary Ecological Appraisal

## **SITE LOCATION**

Garages Adj to 1 Bluebell  
Close, London, SE26 6SN

## **ISSUE DATE**

14th April 2025

## **OUR REFERENCE**

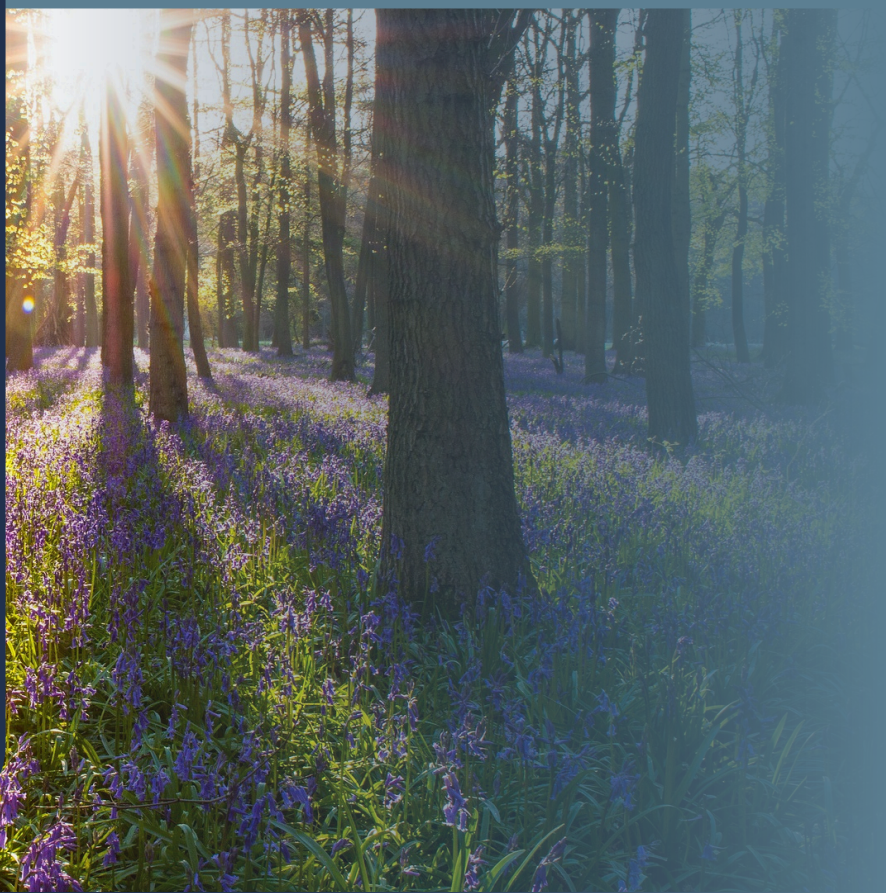
250401 2034 PEA V1 DRAFT  
ISSUE

## **PREPARED FOR**

Renkap

## **PRINCIPAL AUTHOR**

Laura Carter  
Head of Ecology  
BSc (Hons) MCIEEM



Preliminary Ecological Appraisal

VERSION: V1 DATE: April 2025  
REF NO: 250401 2034 PEA V1 DRAFT ISSUE



Quality Assurance




Issue/revision		Issue	
Remarks		Version 1	
Date		14 April 2025	
Principal Author		Laura Carter	
Position		Head of Ecology	
Qualifications		BSc (Hons) MCIEEM	
Signature			
Review by		Luke Waddison	
Position		Assistant Ecologist	
Qualifications		BSc (Hons) MSc	
Signature			
Authorised by		Laura Carter	
Position		Head of Ecology	
Qualifications		BSc (Hons) MCIEEM	
Signature			
Project number		2034	



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Summary	
Site surveyed	Garages Adj to 1 Bluebell Close, London, SE26 6SN National Grid reference TQ 33992 71654
Purpose and brief	Preliminary Ecological Appraisal Commissioned by Renkap
Development proposals	The Proposed Development is currently unknown but is likely to comprise the redevelopment of the area
Methods	Desk study UK Habitat Classification (UKHab) survey of the Site Daytime Bat Walkover Assessment of likely significant effects as far as can be reasonably known.
Confirmed ecological constraints	None
Potential ecological constraints	Impacts to SINC adjacent to Site Nesting Birds Lighting for bats Badger and Hedgehogs
Recommendations/ Further survey works required	Production of a wildlife-sensitive lighting scheme General Avoidance Measures CEMP
Opportunities for ecological enhancement	Hedgehog shelter Bird boxes Native species planting





## 1. Introduction/Background

### 1.1 Author

- 1.1.1 The Principal Author of this report is Laura Carter BSc (Hons) (Head of Ecology). The Principal Author has over eight years of professional experience in ecological consultancy and has worked on projects ranging in scale including commercial and residential sites. The Principal Author currently holds a Level 2 class survey licence from Natural England for bats (*Chiroptera* spp.) and a Level 1 class survey licence for great crested newts (*Triturus cristatus*), and is a Full member of the Chartered Institute of Ecology and Environmental Management (CIEEM); she is therefore subject to CIEEM's Code of Professional Conduct.
- 1.1.2 The Reviewer of this report is Luke Waddison BSc (Hons) MSc (Assistant Ecological Consultant). The Reviewer has over two years of professional experience in ecological consultancy and has worked on projects from large national infrastructure developments to commercial and residential sites throughout the country. Luke is also a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM); he is therefore subject to CIEEM's Code of Professional Conduct.
- 1.1.3 The detail provided within this report is a true and accurate reflection of both the Site conditions at the time the survey was completed, as well as the professional opinion of the Principal Author.

### 1.2 Purpose and Brief

- 1.2.1 Renkap (the Client) commissioned Wharton Natural Infrastructure Consultants Ltd (Wharton) to undertake a Preliminary Ecological Appraisal (PEA) of an area of land known as Garages Adj to 1 Bluebell Close, London, SE26 6SN (see land within the red line boundary in Appendices 1 and 2), known herein as 'the Site'.
- 1.2.2 The purpose of the PEA (as per CIEEM guidance (CIEEM, 2018)) is to inform the design of the Proposed Development. The key objectives of a PEA are to:
- Identify the likely ecological constraints associated with the Proposed Development;
  - Identify any mitigation measures likely to be required, following the '*Mitigation Hierarchy*';
  - Identify any additional surveys that may be required to inform an Ecological Impact Assessment (EclA); and
  - Identify the opportunities offered by the Proposed Development to deliver ecological enhancement.

### 1.3 Description of Site and Local Area

- 1.3.1 The Site is located to the north of the A2199, south of the A205, west of the Sydenham railway station and rail line to Hassocks. It is centred approximately at National Grid reference TQ 33992 71654
- 1.3.2 The Site comprised predominately developed land sealed, with individual trees around the borders. The Site is bordered to the south by residential dwellings, west by driveway and Sydenham Hill road, north by vegetated garden and further residential dwellings, and east by lowland mixed deciduous woodland.
- 1.3.3 Land use in the immediate and wider area is a mix of residential, commercial and industrial areas. The Site is relatively well connected from an ecological perspective due to the presence of lowland mixed deciduous woodland immediately east of the Site and throughout the local area, vegetated gardens with trees, and low density of buildings within the locality.
- 1.3.4 Wildlife corridors are present in the local area, including the deciduous woodland located on near



or adjacent to all aspects of the Site, providing connectivity to Local Nature Reserves (LNR) including Sydenham Hill Wood LNR and Fern Bank LNR c.135m west of Site reaching as far as c.1.65km north of Site. The Site is also connected to lowland mixed deciduous woodland with ponds and lakes, with the nearest of these ponds c.550m south of Site. The Site itself however does not contribute to the functionality of these corridors.

- 1.3.5 Significant terrestrial barriers to the Site include the A212 c.200m to the south, and close board fencing the neighbouring residential developments. However, these are not considered major barriers to mobile aerial fauna.

### **1.4 The Proposed Development**

- 1.4.1 The Proposed Development is currently unknown but is likely to comprise the redevelopment of the Site and will be referred to throughout this report as the 'Proposed Development'.



## 2. Relevant Planning Policy & Legislation

### 2.1 Relevant Legislation

2.1.1 National and international legislation relevant to the Proposed Development is summarised in Table 1.

**Table 1. Legislation Relevant to the Proposed Development**

Legislation*	Relevance to the Proposed Development
<p><b>The Conservation of Habitats and Species Regulations 2017 (HMSO, 2017)</b> <i>Amended by<sup>1</sup></i></p> <p><b>The Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 (HMSO, 2019)</b></p>	Affords protection to species listed under Schedules 2 and 5 and gives provision for the allocation and protection of European protected sites.
<b>The Wildlife and Countryside Act 1981 (as amended) (HMSO, 1981)</b>	Affords protection to species listed under Schedule 5 of the Act and gives provision for the allocation of statutory wildlife sites.
<b>The Natural Environment and Rural Communities (NERC) Act 2006 (HMSO, 2006)</b>	Places a duty on planning authorities to consider habitats and species of principal importance in planning applications.
<b>The Protection of Badgers Act 1992 (HMSO, 1992)</b>	Offences under the Act include damaging, destroying or obstructing access to a badger sett, disturbing a badger when it is occupying a badger sett, and killing or injuring a badger.
<p>*Full legislative text should be referred to as table text is a summary only. 1 - The Conservation of Habitats and Species Regulations 2017 provides safeguards for European Protected Sites and Species (as listed in the Habitats Directive). This has recently been amended by the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 which continue the same provision for European protected species, licensing requirements, and protected areas now the UK has left the European Union.</p>	



2.2 Relevant Planning Policy

2.2.1 Planning policies which are relevant to the Proposed Development are summarised in Table 2.

Table 2. Planning Policy Relevant to the Proposed Development

Planning Policy	Relevance to the Proposed Development
National Planning Policy Framework (Ministry of Housing, Communities and Local Government, 2024)	Section 193 of the NPPF states:  <i>"if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused".</i>

\*Full policy text should be referred to as table text is a summary only.

2.2.2 The Lewisham Council Core Strategy (Lewisham Council, 2011) has been reviewed, and an excerpt of the relevant ecological policies is provided in Appendix 4.





## 3. Methods & Methodology

### 3.1 Desk Study & Consultation

- 3.1.1 A desk study was carried out to gather background ecological data, and the following resources were used for the data search:
- Multi Agency Geographic Information for the Countryside (MAGIC) Interactive (DEFRA, 2025) map was used to determine the presence of granted European Protected Species Mitigation licences at and within 1km of the Site.
  - Google Earth Pro (Google Earth Pro, 2025) aerial and historic imagery were used to assess the ecological connectivity at the Site as well as its historic use to assess suitability of habitats locally for foraging and commuting wildlife.
  - Biological records have been obtained from eCountability (eCountability, 2025) from within a 1km radius of the central grid reference provided in Paragraph 1.3.1, for statutory wildlife sites, non-statutory wildlife sites and legally protected and notable species.

### 3.2 Field Survey

- 3.2.1 A UK Habitat Classification (UKHab) survey and Daytime Bat Walkover (DBW), comprising the methods detailed below, were carried out on 27 March 2025 by the Principal Author.

- 3.2.2 Weather conditions at the time of survey were dry and clear.

#### **UKHab Survey**

- 3.2.3 A UKHab Survey (UKHab Ltd, 2023) was carried out at the Site. UKHab provides a comprehensive habitat classification system for the UK and enables details in relation to the presence of notable (such as Section 41 Habitats of Principal Importance) or protected habitats (such as Annex I habitats) to be obtained.
- 3.2.4 The UK Habitat Classification Version 2.01 was used for assessment of the Site, using the *Professional Edition Hierarchy*. Habitats were classified to Level 4 or the highest level available where a Level 4 classification does not exist (e.g. modified grassland).
- 3.2.5 Based on the characteristics of the Site, the habitats it supports (as assessed from remote aerial imagery during the desk study), and other information from the desk study such as biological records, an assessment was made of the suitability of the Site to support protected or notable species. Those species for which the Site was deemed to be unsuitable or where impacts are unlikely to occur due to the Site location, a lack of nearby suitable habitat and/or a lack of biological records were scoped out. These species are listed in Section 4.5.
- 3.2.6 Habitats at the Site were identified and mapped; they are illustrated on the UK Habitat Classification Plan in Appendix 2. Where appropriate, target notes have been used to identify areas on the plan that require further detail, and this has been included in the report.
- 3.2.7 Plant names (common and scientific) within this report follow 'New Flora of the British Isles' (Stace, 2010).

#### **Daytime Bat Walkover**

- 3.2.8 The DBW of the buildings at the Site for roosting bats followed current best practice guidance (Collins, 2023).
- 3.2.9 The buildings were inspected by the Principal Author (who holds a Natural England Level 2 bat class survey licence) for field evidence of bats including: droppings, individual bats (live or dead), feeding remains, scratch marks, urine staining, grease marks and clean cobweb-free gaps around



potential entrance points and crevice roost sites.

- 3.2.10 The buildings were classified according to the criteria set out in Table 3 in accordance with standard guidance (Collins, 2023). With respect to roost type, the assessments in this report are made irrespective of species conservation status, which is established after presence is confirmed.

**Table 3. Bat Roost Suitability Descriptions (based on Collins 2023)**

Suitability	Description of Roosting Habitats
<b>Confirmed Presence</b>	Presence of roosting bats within the structure confirmed by the survey
<b>High</b>	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
<b>Moderate</b>	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
<b>Low</b>	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. 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 a larger number of bats (i.e., unlikely to be suitable for maternity or hibernation).
<b>Negligible</b>	A structure that appear unsuitable for roosting bats due to a clear lack of roosting spaces and/or absence of suitable access points, such as voids, small crevices etc,

## Ground Level Tree Assessment

- 3.2.11 The trees near the Site were assessed based on the presence, number and type of Potential Roost Features (PRFs) including woodpecker holes, lifting bark, cracks, crevices, knot holes and wounds. Trees were assessed from ground level only.
- 3.2.12 Trees were classified according to the criteria set out in Table 4 in accordance with standard guidance (Collins, 2023). With respect to roost type, the assessments in this report are made irrespective of species conservation status, which is established after presence is confirmed.

**Table 4. Tree Roost Feature Suitability Descriptions (based on Collins 2023)**

Suitability	Description of Roosting Habitats
<b>PRF</b>	Trees with at least one PRF present. Individual PRFs may be further categorised based on their potential to support individual/very small numbers of bats (PRF-I) or multiple bats (PRF-M)



FAR	Further assessment required to establish if PRFs are present in the tree
NONE	Trees that appear unsuitable for roosting bats due to a clear lack of PRFs

3.3 Limitations and Caveats

- 3.3.1 March is a suboptimal time of the year for botanical survey to be undertaken.
- 3.3.2 Due to lack of vegetation and where present, the species present at the time of the survey, and the indicative nutrient enrichment of the soil (deduced from the prevalence of species such as perennial ryegrass (*Lolium perenne*) and common nettle (*Urtica dioica*), it is unlikely that important plant species requiring further detailed botanical survey are present at the Site. This limitation is therefore not considered to be significant.
- 3.3.3 This report is based solely on the Site conditions on the 27 March 2025 and provides a 'snapshot' of Site conditions at this time only.

3.4 Evaluation of Ecological Features

- 3.4.1 The likelihood of the occurrence of any protected and/or invasive species at the Site relies on assessment of habitat suitability for the species at the Site as well as an evaluation, in parallel, of desk study data and published guidance/literature which is referenced accordingly:
- 3.4.2 The CIEEM EcIA guidelines (CIEEM, 2018) state that *"the importance of an ecological feature should be considered within a defined geographical context"*. The suggested frames of reference within the CIEEM EcIA guidelines have been adapted appropriate to the location of the Site and the nature of the Proposed Development. These frames of reference in this case are:
  - International and European
  - National (England)
  - Regional (Southeast London)
  - Principal Area (London Borough of Lewisham)
  - Local (Sydenham)



## 4. Ecological Baseline and Assessment of Impacts and Effects

### 4.1 Zone of Influence

- 4.1.1 The Zone of Influence (Zol) for the Proposed Development is the area within which significant ecological impacts could occur to ecological features.
- 4.1.2 The Zol differs for each ecological feature, and the Zol has been clearly stated in the baseline assessment of each ecological feature below.
- 4.1.3 The Zol has been stated for every ecological feature except those where there is clearly a lack of suitable habitat at or adjacent to the Site, and therefore no pathways by which impacts could occur to the feature.
- 4.1.4 Where a Zol has been provided for a species that has subsequently been scoped out of further assessment, the Zol relates to the area considered as part of the initial scoping assessment for that ecological feature (i.e. the area within which potential impacts to the feature have been considered).

### 4.2 Statutory Wildlife Sites

#### **Zol**

- 4.2.1 The Zol for statutory wildlife sites is considered to be 1km from the Site boundary. This is due to the limited impacts reasonably anticipated from the occupational phase of the Site to the local area for recreational purposes.

#### ***Baseline and Assessment of Impacts and Effects***

- 4.2.2 Two statutory wildlife sites lie within 1km of the Site.
- 4.2.3 These are Sydenham Hill Wood and Fern Bank Local Nature Reserve (LNR) lies c.125m west of the Site and Dulwich Upper Wood LNR c.410m southwest of the Site. Sydenham Hill Wood is designated for a large expanse of ancient woodland and a contiguous area of self-regenerating, semi-natural woodland, and Dulwich upper wood is the reason for designation is not stated but the woodland contains: Mixed Oak woodland, woodland birds, stag beetles (Lucanidae) and bats (Chiroptera). The Site is not directly linked to these Sites, and the woodland to immediately adjacent to the east of the Site will be unaffected by works.
- 4.2.4 The Site does lie within an Impact Risk Zone for more distant statutory sites, however, there is no requirement to consult Natural England at this location.
- 4.2.5 No direct or indirect impacts to statutory wildlife sites are considered likely to arise because of the Proposed Development due to the intervening distance, direction and use of the Site.

### 4.3 Non-statutory Wildlife Sites

#### **Zol**

- 4.3.1 The Zol for non-statutory wildlife sites is considered to be 1km from the Site boundary. This is due to the limited impacts reasonably anticipated from the occupational phase of the Site to the local area (such as for recreational purposes).

#### ***Baseline and Assessment of Impacts and Effects***

- 4.3.1 Fourteen non-statutory wildlife sites lie within 1km of the Site.





**Table 5. Non-statutory wildlife sites**

Site	Designation	Distance	Reason for designation
Hillcrest Estate Woodland	Site of Importance for Nature Conservation (SINC) and Proposed SINC	Adjacent to the east	Remnants of ancient woodland, once part of the Great North Wood, surrounding a housing estate. Some large old oak ( <i>Quercus</i> sp.) and sweet chestnut ( <i>Castanea sativa</i> ) trees date from this time.
Dulwich and Sydenham Hill Woods	SINC	c.125m west and c.505m north	The largest remnant of the historic Great North Wood, the closest ancient woods to central London, with a good range of woodland plants, fungi and birds.
Crystal Palace Park	SINC	c.270m south	A large park with a good range of habitats, including a lake which is valuable for water birds.
Sydenham Wells Park	SINC	c.285m east	Complex water features, mature trees and a mass of dense shrubbery, providing habitats for waterfowl and other birds.
Hitherwood (Carlton Place Copse)	SINC	c.345m northwest	A small fragment of ancient woodland, surviving in the middle of a housing estate.
Dulwich Upper Wood and College Road Wood	SINC	c.395m south	Small fragment of ancient oak woodland, surrounded by secondary woodland of oak, sycamore ( <i>Acer pseudoplatanus</i> ), lime sp. ( <i>Tilia</i> sp.) and ash ( <i>Fraxinus excelsior</i> ), with a good variety of other trees and shrubs.
Sydenham Hill and West Dulwich Railsides	SINC	c.555m northwest	Densely wooded rail sides between Sydenham Hill and West Dulwich stations are a valuable corridor for wildlife.
Countisbury House Lawns	SINC	c.650m southwest	Lawns of this large block of council flats comprise of species rich, damp neutral grassland supporting rare species.

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Site	Designation	Distance	Reason for designation
Long Meadow	SINC	c.650m east	A fragment of the former countryside surrounded by residential development. It represents quite a large area of informal grassland, an uncommon habitat in Southwark, providing refuge and foraging habitat for invertebrates, birds, bats and possibly small mammals.
Gipsy Hill Railway Cutting	SINC	c.690m southwest	Steep railway cutting with a mix of scrub, vacant derelict land and scattered mature trees
Grange Lane Allotments (South)	SINC	c.765m north	Large allotment site with ancient boundaries and native woodland.
Railway Linesides – West Norwood	SINC	c.770m southwest	Vacant derelict land. Breeding birds include dunnocks, wrens and song thrushes, and sparrowhawks have been seen hunting up and down the track
Grange Lane Allotments (North)	SINC	c.880m north	Informal allotment site with numerous wildlife ponds.
Dulwich and Sydenham Hill Golf Course	SINC	c.975m north	A large golf course with some mature oaks, native oak woodland and ponds.

- 4.3.2 The Proposed Development Site does not share the primary designated habitats of Hillcrest Estate Woodland SINC, and the Site is considered unlikely to act as a supporting habitat for any fauna associated with the non-statutory sites due to the lack of habitat within the red line boundary.
- 4.3.3 Due to the adjacent woodland and designations as a SINC, a Construction and Environmental Management Plan (CEMP) will be required to ensure dust disposition, noise, water run off and chemical spills are managed appropriately to prevent any negative impacts to Hillcrest Estate Woodland SINC immediately adjacent to the east of the Site.
- 4.3.4 The Proposed Development is unlikely to have any direct impacts on the remaining surrounding non-statutory sites due to the distance between the development and these non-statutory sites.
- 4.3.5 No further survey or assessment regarding non-statutory wildlife sites is required and no significant effects to non-statutory wildlife sites are likely to arise as a result of the Proposed Development that can't be managed with and appropriate CEMP and appropriate tree protection measures, that have been provided in the Arboricultural Impact Assessment (Wharton, 2025) to ensure the future value of these trees.

## 4.4 Habitats

- 4.4.1 A plan of the habitats detailed below is provided in Appendix 2.



- 4.4.2 The assessment of importance within Section 4.4 relates solely to the botanical importance of habitats at the Site. It does not take use or possible use by protected species into account as this is addressed within Section 4.5.

### **Zol**

- 4.4.3 The Zol for habitats in relation to the Proposed Development is the habitats within the Site boundary and adjacent habitats only. This is because impacts to adjacent woodland habitats as a result of the Proposed Development may occur.

### **Buildings and Hardstanding – u1b5 and u1b6**

#### *Baseline and Assessment of Impacts and Effects*

- 4.4.4 The Site comprised a bank of single-story brick and block construction garages and driveway. A more detailed description of the buildings is provided in Section 4.5 of this report, within the assessment of impacts for bats.

### **Modified Grassland – g4**

#### *Baseline and Assessment of Impacts and Effects*

- 4.4.5 Modified grassland was present beneath the individual trees on Site. Species comprised perennial ryegrass, common nettle, red dead nettle (*Lamium purpureum*), white clover (*Trifolium repens*), dandelion (*Taraxacum* agg.), daisy (*Bellis perennis*) and ribwort plantain (*Plantago lanceolata*).
- 4.4.6 The modified grassland is not considered to be ecologically important due to the small extent of the habitat at the Site, the limited botanical diversity and the nutrient enrichment of the soils.
- 4.4.7 It is unclear if the grassland will be lost as a result of the Proposed Development, however this loss will not result in a significant ecological effect.

### **Individual Trees**

#### *Baseline and Assessment of Impacts and Effects*

- 4.4.8 There were four individual trees in the modified grassland on the Site. These comprises two mature yew trees (*Taxus baccata*) (T2, T4) and a two Scots pine (*Pinus sylvestris*) (T1, T3) as labelled in the accompanying AIA report (Wharton, 2025).
- 4.4.9 The neighbouring tree from the residential garden overhang of the site is a cedar (*Cedrus deodara*) (T7) and to the rear of the property over-handing the garages and part of the neighbouring SINC were two laurels (*Prunus laurocerasus*) (T10 and T11) and a sycamore (*Acer pseudoplatanus*) (T12). The branch of the sycamore (T12) was resting on the garage roof.
- 4.4.10 None of these trees had any features suitable for roosting bats. At the time of writing, it is unknown as to whether these trees will be retained as part of the Proposed Development. However, should the footprint of hardstanding increase it is considered likely that all of the trees within the Site boundary will be removed as part of the Proposed Development, with the neighbouring trees requiring works to accompany the development, these can be found detailed in the accompanying AIA report. (Wharton, 2025).
- 4.4.11 The trees on Site would not be easily replaceable due to their size and ages providing structural diversity to the Site and local area,

### **Biodiversity Net Gain (BNG)**

- 4.4.12 Biodiversity Net Gain has become a mandatory requirement for planning as of February 2024/ April 2024 (SSM) and therefore further assessment to ensure a minimum 10% net gain for biodiversity is required. It is recommended that an area of the Site is set aside for habitat creation within any proposals. Habitat creation may involve scrub planting, wildflower grassland areas, or a



combination of measures.

## 4.5 Species Baseline and Assessment of Impacts and Effects

4.5.1 Biological records have been provided by eCountability (eCountability, 2025). The data are licensed for use by Wharton and the Client for a 12-month period and are not owned by Wharton or the Client as ownership of the data remains with the data provider.

4.5.2 The Site was assessed for its suitability to support the following species during the Site survey:

- Badger (*Meles meles*);
- Bats (Chiroptera spp.);
- GCN and other amphibians;
- Hazel Dormouse
- Wild birds; and
- Section 41 mammals.

4.5.3 The following species/species groups have been scoped out of further assessment due to a complete lack of suitable habitat on or near the Site. No significant effects (adverse or otherwise) to these species are anticipated as a result of the Proposed Development, and no legislative breach in respect of the species' legal protection is anticipated.

- Freshwater fish;
- Marine flora & fauna;
- Reptiles
- Otter (*Lutra lutra*);
- Water vole (*Arvicola amphibius*); and
- White-clawed crayfish (*Austropotamobius pallipes*).

### **Badger**

#### *Zol*

4.5.4 The Zol for badger is considered to be the Site and 30m outside of the Site boundary only. No important habitats for badger are considered to be affected outside of the Site boundary by the Proposed Development.

#### *Baseline and Assessment of Impacts and Effects*

4.5.5 The biological records show records of badger within 1km of the Site in 2014, these records are confidential and therefore number of badger records and distances from Site cannot be determined.

4.5.6 No evidence of badger was identified at the Site or within 30m of the Site, however due to adjacent habitats, if badgers are present within the local area badger may migrate into the Site.

4.5.7 The risk of a breach of legislation in respect of badger from the Proposed Development is considered to be low.

### **Bats**

#### *Zol*

4.5.8 The Zol for bats is considered to be the Site and adjacent habitats only. No important habitats for bats are considered to be affected outside of the Site boundary by the Proposed Development.





### *Baseline and Assessment of Impacts and Effects - Roosting Habitat*

- 4.5.9 The biological records returned no records of roosting bats within 1km of the Site.
- 4.5.10 A MAGIC Map search for records of EPSML returned one positive result for bats within 1km of the Site. This was for Leisler's bat (*Nyctalus leisleri*) c.335m north of Site from 2017.
- 4.5.11 A set of garages are present at the Site. The garages on Site comprised a single-storey, brick-and-block structure with felt roofs in a sealed and largely good condition. Internally, the roof was constructed in concrete slabs with felt covering providing no potential roosting features or crevices. No potential points of access for bats to the interior spaces were noted on the locked units and the open units revealed no internal roosting features. No evidence for bats was found associated within the two accessed garages.
- 4.5.12 The garages are therefore categorised as having **Negligible Suitability** for bats.
- 4.5.13 Trees at the Site were assessed for their suitability to support roosting bats. At the time of the survey, no suitability for or evidence of roosting bats was identified during the GLTA of trees at the Site.
- 4.5.14 The Site is unlikely to be ecologically important for roosting bats owing to the lack of suitable roosting features.

### *Baseline and Assessment of Impacts and Effects - Commuting and Foraging Habitat*

- 4.5.15 The biological records returned 48 records of commuting and foraging bats within 1km of the Site. Species included brown long-eared bat (*Plecotus auritus*), common pipistrelle (*Pipistrellus pipistrellus*), Daubenton's bat (*Myotis daubentonii*), Leisler's bat (*Nyctalus leisleri*), myotis bat species (*Myotis*), noctule bat (*Nyctalus noctula*), pipistrelle bat species (*Pipistrellus*), serotine (*Eptesicus serotinus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and unidentified bat (*Chiroptera*).
- 4.5.16 There were no suitable habitats at the Site, however, the woodland immediately to the east of the Site provided good foraging habitat for bats within the locality.
- 4.5.17 The Site has negligible suitability for foraging bats. Connectivity to/from the Site is good however and botanical species diversity (which provides an indication of likely abundance of invertebrate prey) is very low throughout the Site.
- 4.5.18 Suitable foraging habitat is present at the lowland deciduous adjacent to Site to the east. The Proposed Development will not adversely affect this woodland or the suitable foraging habitat, no fragmentation effect is considered likely to arise as a result of the Proposed Development. However, lighting impacts through appropriate design need to be considered.
- 4.5.19 The Site is not likely to be ecologically important for foraging or commuting bats, and no significant effects (adverse or otherwise) to commuting or foraging bats are anticipated as a result of the Proposed Development.

### **GCN and other amphibians**

#### *Zol*

- 4.5.20 The Zol for GCN is the Site and ponds within 250m of the Site; this is due to the isolated nature of the Site in the local area and poor associated ecological connectivity.
- 4.5.21 The Zol for other amphibians is the Site and adjacent habitats only.

### *Baseline and Assessment of Impacts and Effects*

- 4.5.22 The biological records returned one result for GCN and other amphibians within 1km of the Site. This was for common toad (*Bufo bufo*), recorded in 2011, c.470m southwest of the Site.

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4.5.23 A MAGIC Map check for records of EPSML applications and licence returns within 1km of the Site, returned no positive results.

4.5.24 There are no ponds shown on OS maps (Promap V2, 2024) within 250m of the Site. It is therefore considered that the likelihood of GCN or other amphibians occurring on Site and being at risk of harm from the Proposed Development is negligible.

### **Invertebrates**

#### *Zol*

4.5.25 The Zol for invertebrates is considered to be the Site only as this is the only likely area where impacts to invertebrates may occur as a result of the Proposed Development.

#### *Baseline and Assessment of Impacts and Effects*

4.5.26 The biological records returned 455 results for 44 **protected and notable** species of invertebrate within 1km of the Site. Species included august thorn (*Ennomos quercinaria*), buff ermine (*Spilosoma lutea*), garden tiger (*Arctia caja*), oak hook-tip (*Platypteryx acornata*), small heath (*Coenonympha pamphilus*), small phoenix (*Ecliptopera silaceata*), white admiral (*Limenitis camilla*), and white-letter hairstreak (*Satyrrium w-album*).

4.5.27 The Site supports very low botanical species diversity, and whilst common invertebrate species likely use the plant species present at the Site as food, larval and egg-laying plants, the likelihood of red data book species or other notable species being present at the Site is negligible.

### **Otter, water vole and white clawed crayfish**

#### *Zol*

4.5.28 The Zol for otter, water vole and white-clawed crayfish is considered to be the Site only as this is the only likely area where impacts may occur as a result of the Proposed Development.

#### *Baseline and Assessment of Impacts and Effects*

4.5.29 Otter, water vole and white clawed crayfish are heavily associated with, and fundamentally reliant upon watercourses. No watercourses are present at or immediately adjacent to the Site, and no watercourses are likely to be adversely affected by the Proposed Development.

4.5.30 No adverse effect to otter, water vole or white clawed crayfish are anticipated as a result of the Proposed Development.

### **Reptiles**

#### *Zol*

4.5.31 The Zol for reptiles is considered to be the Site only as this is the only likely area where impacts to reptiles may occur as a result of the Proposed Development.

#### *Baseline and Assessment of Impacts and Effects*

4.5.32 The biological records returned one record for reptile within 1km of the Site. This was for a common lizard (*Zootoca vivipara*), recorded in 2021, c.350m northeast of Site.

4.5.33 The Site supports no suitable habitat for reptiles, and risk of harm to reptiles as a result of the Proposed Development is negligible.

### **Wild birds**

#### *Zol*

4.5.34 The Zol for wild birds is the Site and adjacent habitat only, as this is the only area where impacts to wild birds may occur as a result of the Proposed Development.



### *Baseline and Assessment of Impacts and Effects*

- 4.5.35 The biological records search returned 1399 total records of 48 species of **protected** and **notable** birds. These records included 13 records of red listed species such as skylark (*Alauda arvensis*), swift (*Apus apus*) and yellowhammer (*Emberiza citrinella*), (BTO, 2024) and six Schedule 1 listed species (HMSO, 1981), consisting of brambling (*Fringilla montifringilla*), fieldfare (*Turdus pilaris*), hobby (*Falco Subbuteo*), osprey (*Pandion haliaetus*), redwing (*Turdus iliacus*), ruff (*Philomachus pugnax*). The closest result was for song thrush (*Turdus philomelos*), c.40m west of Site, recorded in 2013.
- 4.5.36 The Site supports suitable nesting habitat for wild birds via the trees, the grassland on Site is unsuitable for nesting birds. No nests were observed during the survey.
- 4.5.37 The Site is unlikely to support important populations of wintering, breeding or migratory bird species due to the type of habitats present, their location in a highly disturbed urban environment, and the relatively small size of the Site.
- 4.5.38 There is a risk of a breach of Section 1 of the Wildlife and Countryside Act 1981 (as amended) (HMSO, 1981) in relation to damage to/destruction of bird nests and their eggs if the trees are required to be removed during the nesting bird season. Avoidance measures have been recommended to reduce the risk of a breach of legislation to a negligible level.
- 4.5.39 It is unlikely that the Proposed Development will result in significant adverse ecological effects to wild birds, however the potential for a breach in legislation will require avoidance measures which are detailed within Section 5 of this report.

### **Protected plants**

#### *Zol*

- 4.5.40 The Zol for protected plants is the Site only, as this is the only area where impacts to protected plants may occur as a result of the Proposed Development.

### *Baseline and Assessment of Impacts and Effects*

- 4.5.41 The biological records returned 22 results for 6 species of protected and notable plants within 1km of the Site. Species consisted of bluebell (*Hyacinthoides non-scripta*), butcher's-broom (*Ruscus aculeatus*), field garlic (*Allium oleraceum*), large-leaved lime (*Tilia platyphyllos*), medlar (*Mespilus germanica*), and welsh Poppy (*Meconopsis cambrica*). The closest of these was welsh poppy, located c.120m southwest of Site, recorded in 2013.
- 4.5.42 No protected or notable plant species were observed at the Site during the field survey, though the limitation on botanical survey season must be noted.

### **Invasive species**

#### *Zol*

- 4.5.43 The Zol for invasive species is the Site and adjacent habitat only, as these are the only areas where impacts to invasive species are likely to occur as a result of the Proposed Development.

### *Baseline and Assessment of Impacts and Effects*

- 4.5.44 The biological records returned 1486 results for 27 species of invasive non-native organisms within 1km of the Site. Species included Chinese muntjac (*Muntiacus reevesi*), ring-necked parakeet (*Psittacula krameri*), three-cornered garlic (*Allium triquetrum*), tree-of-heaven (*Ailanthus altissima*), and water fern (*Azolla filiculoides*). The closest of these to Site was found in 2020, c.100m west, and was for false-acacia (*Robinia pseudoacacia*).
- 4.5.45 No invasive non-native species were identified on Site, however, the limitation of the timing of the



survey with regards to botany should be noted.

### **Section 41 mammals**

#### *Zol*

- 4.5.46 The Zol for Section 41 mammals is considered to be the Site only as this is the only likely area where impacts to Section 41 mammals may occur as a result of the Proposed Development.

#### *Baseline and Assessment of Impacts and Effects*

- 4.5.47 The biological records for section 41 mammals returned 88 results within 1km. These were all for hedgehog (*Erinaceous europaeus*). The closest of these was recorded in 2023, c.220m south of Site.
- 4.5.48 The Site supports no suitable foraging and shelter habitat for hedgehogs. The Site is therefore unlikely to be ecologically important for hedgehog although they may commute through the Site from the wider area and woodland cover.
- 4.5.49 The Proposed Development has the potential to adversely affect individual hedgehogs that may use the Site via direct impacts from machinery or becoming trapped in excavations. This effect is unlikely to be significant, however precautionary avoidance measures have been recommended to reduce the likelihood of potential impacts occurring to a negligible level.





## 5. Ecological Constraints and Opportunities

### 5.1 Key Constraints to Design

- 5.1.1 No key constraints to design have been noted through the site survey. Without full proposals, it is unclear as to the impacts on the trees at the Site, which should be retained where practicable and care taken for works near the SINC woodland.

### 5.2 Further Surveys Required

- 5.2.1 No further survey for protected species are considered to be necessary in respect of the planning application.

### 5.3 Mitigation and Impact Avoidance Measures

#### ***Construction and Environmental Management Plan (CEMP)***

- 5.3.1 To prevent any construction-based impacts to the individual trees on Site, and adjacent Hillcrest Estate Woodland SINC including pollution runoff, dust dispersal, noise and safe working measures for birds, badgers and hedgehog, which can access the Site through interconnected habitat, a Construction and Environmental Management Plan (CEMP) must be provided.

#### ***Bats***

- 5.3.2 Whilst the Site is unlikely to be important for foraging or commuting bats, any new lighting (permanent or temporary) as part of the Proposed Development must be kept to a minimum and directed away from the peripheries of the Site preclude the likelihood of disturbance to bats that may utilise the Site occasionally. A wildlife sensitive lighting scheme should be designed in accordance with the Bat Conservation Trust and Institute of Lighting Professionals guidance (BCT, ILP &, 2023).

#### ***Badgers and Hedgehog***

- 5.3.3 It is possible that individual hedgehogs may be impacted by Site clearance and excavation works (injury/death and trapping respectively). As a precautionary measure, should brash removal near the woodland be required to be cleared at the Site, this must be checked for hedgehogs immediately prior to removal to reduce the likelihood of adverse effects to this species.
- 5.3.4 Any open excavations that cannot feasibly be infilled overnight must also be covered with a solid sheet material (i.e., plywood) to prevent fauna from falling into excavations and becoming trapped. Should this not be possible, a shallow slope must be dug into the excavation prior to it being left overnight to allow an escape route for any fauna that may fall in. All excavations must be checked for fauna in the morning prior to works commencing.

#### ***Wild birds***

- 5.3.5 No further surveys for breeding, migratory or wintering birds are required at the Site.
- 5.3.6 Birds and their nests are legally protected (HMSO, 1981), and many species are listed as Species of Principal Importance (HMSO, 2006). Priority bird species are also afforded protection in planning through national (Communities and Local Government, 2024) and local planning policy.
- 5.3.7 If the removal of the trees is required on Site to facilitate the Proposed Development, this should avoid the nesting bird season (March to September inclusive) or such features must be checked by a suitably qualified ecologist immediately prior to clearance to check for nesting birds if undertaken during the nesting season.
- 5.3.8 The netting of any suitable bird nesting habitat should be prohibited (CIEEM & RSPB, 2019).



### ***Retained trees***

- 5.3.9 The retained trees should be protected appropriately throughout the construction phase in accordance with BS5837 (BSI, 2012). An arboricultural consultant should be consulted regarding the protection of the trees to be retained on Site, during the construction phase of the development to ensure they remain in good health post-development.

### **5.4 Opportunities for Enhancement**

- 5.4.1 The Proposed Development should also include bird boxes, all of which must be positioned on north-facing aspects, out of direct sunlight (to avoid overheating eggs and chicks) and at a height of c.4m (to avoid predation by domestic cats). The provision of the specific bird boxes listed below will deliver additional nesting opportunities. These should include:
- General nesting boxes; one bird box with a 25mm entrance hole and one bird box with a 32mm entrance hole, both of which can be placed on suitable trees around the Site.
- 5.4.2 Hedgehog shelters should be provided at the Site as part of the Proposed Development, to enhance the Site for sheltering hedgehogs. These should be placed along the SINC edge with the Site within vegetation and away from roads.
- 5.4.3 The landscaping design for the Proposed Development should include the planting of a wide-range of native species, including nectar and pollen-rich species, to attract invertebrate prey for a variety of animals in the local area, which will enhance the Site's biodiversity. These can be chosen from the RHS: Perfect for Pollinators List (RHS, 2019).



## 6. Conclusion

- 6.1.1 No further surveys for protected species are considered to be necessary in respect of the Proposed Development and subsequent planning application.
- 6.1.2 A CEMP should be produced to protect the SINC adjacent to the Site.
- 6.1.3 Whilst the Site is unlikely to be important for foraging or commuting bats, any new lighting (permanent or temporary) as part of the Proposed Development must be kept to a minimum and directed away from the peripheries of the Site preclude the likelihood of disturbance to bats that may utilise the Site occasionally. A wildlife sensitive lighting scheme should be designed in accordance with the Bat Conservation Trust and Institute of Lighting Professionals guidance (BCT, ILP &, 2023).
- 6.1.4 Avoidance and good practice construction measures for badger, hedgehogs and nesting birds are necessary to prevent harm to these species and potential breach of legislation.
- 6.1.5 Enhancement measures have been provided for birds and hedgehogs, as well as planting recommendations



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**Appendix 1 – Site Location Plan (Google Earth Pro, 2025)**









**Appendix 2 – UK Habitat Classification Plan**





Scale: 1:250



Red Line Boundary



Existing Large Urban Tree



Existing Medium Urban Tree



Developed land; sealed surface



Modified grassland



Date: 11/04/2025

Client: Renkap

Project: Garages Adj to 1 Bluebell Close, London,  
SE26 6SN

Title: UK HAB BASELINE

Map file reference

250411 2034 BBNG V1

Plan no.

E001

**WHARTON**  
LAND | TREES | ECOLOGY

6 Chestnut Court | Jill Lane | Redditch | B96 6EW

E: info@wnic.co.uk

T: +44 (0)1789 459458

WWW.WNIC.CO.UK

0 10 20 m





Appendix 3 – The Proposed Development Layout - TBC



## Appendix 4 – Local Planning Policy Excerpts (Lewisham Council, 2011)

### Core Strategy Policy 12

#### Open space and environmental assets

1. In recognising the strategic importance of the natural environment and to help mitigate against climate change the Council will:
  - a. conserve nature
  - b. green the public realm
  - c. provide opportunities for sport, recreation, leisure and well-being.
2. This will be achieved by:
  - a. protecting the character, historic interest and amenity of, and within, open spaces, as well as the effects of development outside their boundaries
  - b. protecting Metropolitan Open Land, open space, urban green space and green corridors from inappropriate built development to ensure there is no adverse effect on their use, management, amenity or enjoyment in accordance with the principles of PPG2 and the London Plan
  - c. maintaining and improving the publicly accessible open space network, such as the Waterlink Way, the Thames Path, the South East London Green Chain, the East London Green Grid, parks and gardens, playing fields, nature reserves, allotments, community gardens, amenity green space, cemeteries and churchyards as well as smaller open spaces that have townscape quality
  - d. designating additional Metropolitan Open Land in accordance with the London Plan definitions, in particular Sydenham Wells Park, Horniman Gardens and Telegraph Hill Park due to the role they perform in the South East London Green Chain
  - e. improving the quality of accessibility to existing open space by public transport, cycle and foot
  - f. preserving or enhancing the local biodiversity and geological conservation interests in accordance with national and regional policy, in the form of PPS9 and the London Plan by designating Sites of Importance for Nature Conservation
  - g. protecting trees, including street trees, and preventing the loss of trees of amenity value, and replacing trees where loss does occur
  - h. seeking new on-site provision of public and private open space as part of new development
  - i. improve accessibility to existing areas of public open space in the identified areas of open space deficiency within the wards of Brockley, Catford South, Lee Green, Perry Vale and Telegraph Hill
  - j. seeking exemplary design for new, and improvements to existing open space, in the context of the local character and its distinctive historical qualities working with the Environment Agency (EA) where appropriate
  - k. maximising opportunities for sport and recreation through well-designed and managed spaces, which take into account the Mayor's Children and Young People's play space requirements in a safe environment
  - l. promoting living roofs and walls in accordance with London Plan policy and Core Strategy Policy 8
  - m. promoting and supporting local food growing and urban agriculture.
3. Planning obligations will be sought to ensure the implementation of this policy where appropriate.



## Core Strategy Policy 16

### **Conservation areas, heritage assets and the historic environment**

The Council will ensure that the value and significance of the borough's heritage assets and their settings, which include the Maritime Greenwich World Heritage Site, conservation areas, listed buildings, archaeological remains, registered historic parks and gardens and other non designated assets such as locally listed buildings, will continue to be monitored, reviewed, enhanced and conserved according to the requirements of government planning policy guidance, the London Plan policies, local policy and English Heritage best practice.

The Council will work with its partners, including local communities, to ensure that the borough's heritage assets and those yet to be identified will be valued positively and considered as central to the regeneration of the borough as detailed in the Core Strategy spatial policies.

The World Heritage Site buffer zone for the Maritime Greenwich World Heritage Site is identified on the Proposals Map (see also Core Strategy Policy 18). The Council will ensure that its Outstanding Universal Value, integrity and authenticity will be protected and enhanced and will ensure the implementation of the World Heritage Site Master Plan.

The Council will continue to review its conservation areas, designating new ones and preparing associated management plans and policies to conserve their character.





## Appendix 5 – Site Photographs



**Figure 1. Front profile of garages.**



**Figure 2. Side elevation of garages.**



**Figure 3. Rear of Garages with some ivy covering.**



**Figure 4. Garages and mature tree to rear.**



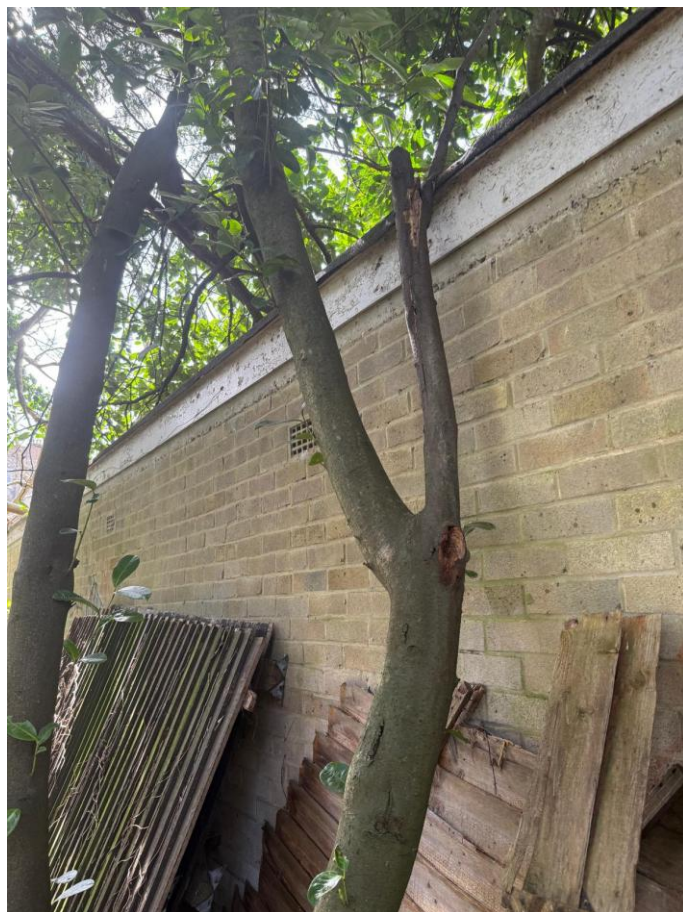
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*Figure 5. Evidence of sealed fascia*



*Figure 6. Laurel overhanging the garages.  
Leaning fences provide potential shelter to hedgehogs.*



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*Figure 7. Tree neighbouring the Site*



*Figure 8. Mature Yew tree and grassland area in front of garages*

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6 Chestnut Court,  
Jill Lane,  
Sambourne,  
Warwickshire  
B96 6EW

01789 459458  
[hello@wnic.co.uk](mailto:hello@wnic.co.uk)  
[wnic.co.uk](http://wnic.co.uk)