

Ecology considerations for planning applications

When assessing planning applications that may impact upon your neighbourhood, please check that the application includes a Preliminary Ecological Assessment (PEA). This is important as Coulsdon is within an ecological hotspot, as defined by Greenspace for Greater London (GiGL), Local Environment Records Centre (LERC).

<https://www.gigl.org.uk/our-data-holdings/planning-for-nature/biodiversity-hotspots-for-planning/>

PEAs often fail to use ecology data available from GiGL, the recognised LERC for London, instead using data such as the Multi-Agency Geographic Information for the Countryside (MAGIC) database. The latter lacks sufficient detail and by relying upon it, developers are choosing to ignore best practice guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM).

Appendix 2. Desk Studies (p. 14) states,

“In the majority of cases it will be appropriate to also obtain information in the UK from the Local Environmental Records Centre (LERC40); (...); or equivalent on non-statutory designated sites and existing records of protected and priority species.

In the UK, background data searches will generally not be considered adequate by the Local Planning Authority or other regulatory authority if they rely entirely on open access data, as some of these datasets are not necessarily comprehensive or are not at a fine enough resolution to inform local decisions.”.

What to look for

Often a PEA will claim that it is an urban environment, when suburban better describes the characteristics of most of Coulsdon.

Most PEAs will focus upon a few headlines, such as bats and mature trees. Usually, only cursory attention is given to other protected wildlife, most notably reptiles and amphibians.

Any statement that gardens are an unsuitable habitat for reptiles is patently false, protected slow worms are both common and breeding readily in gardens in and around Coulsdon.

Likewise, the likelihood of amphibians is dismissed by stating that there are no ponds within 500 meters of the development site. Even a cursory look at Google Earth often reveals a small garden pond in a neighbouring

garden, perhaps less than 10 meters away. Talking to the owner will usually reveal that newts, frogs and toads breed in the pond every year.

And if they are breeding in the pond, it is highly likely that that are foraging and hibernating over quite a wide range, including your garden.

GiGL data shows the likely presence protected reptile and amphibian species in the immediate area. For example, within 1 km of Bramley Avenue there are records for over 40 slow worms, 23 frog and 5 toad sightings (as of November 2023). All of these are designated London Priority Species for conservation.

Another point to watch for is the timing of any field surveys at the development site. If these were conducted outside of April to October they would not be valid for reptiles.

Adding to the data pool

Residents are actively encouraged to submit all wildlife sightings for inclusion in the GiGL database. This is easy, take a photo with your phone and upload to <https://www.gigl.org.uk/submit-records/submit-a-record/>

Summary

When submitting comments on planning applications, check that there is a PEA; that it meets the conditions set out by CIEEM, including GiGL data; and that it is accurate based upon the information above.

If the PEA does not meet these standards, include reference to the policies below in your objection.

Relevant policies

- Policy G6 of the London Plan 2021 - Biodiversity and access to nature
- Policy DM27 of the Croydon Local Plan 2018 - Protecting and enhancing our biodiversity
- Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990 (inserted into the 1990 Act by Schedule 14 of the Environment Act 2021, and amended by the Levelling Up and Regeneration Act 2023).