

Assessing the Ecological Impact of Events

A. First Principles – Understanding and Mitigating the Risk of Ecological Impacts

This section is for general observation as to good practice in risk assessing the potential ecological impacts of any event or other activity.

Any activity taking place within a site, no matter how large or small, or how ecologically diverse the site may be, will exert some form of impact on extant biodiversity. The scale, frequency, location and type of activity determines whether such an impact is adverse (as some can be beneficial) and then how severe that adverse impact is.

This applies equally to events taking place in a park as it does to most other activities like constructing a new playground or MUGA, cutting the grass or removing a diseased tree, installing a new gas/water main through the site, permitting it to be used for sports like football or running, or even constructing a new wildflower meadow on an old cinder sports pitch.

An adverse impact, once identified and understood, can then be removed or minimised through appropriate mitigation, e.g. doing something to reduce its effect, or through a form of compensation either on or off site (e.g. planting a new tree when an older but unsafe one needs removing).

This includes timing activities to allow sensitive species to avoid being adversely affected (e.g. tree works outside the normal bird nesting season), introducing systems with a reduced ecological effect (e.g. turning floodlights and other lighting off when no longer required and limiting the illumination period), locating the activity in an area that is less ecologically sensitive (e.g. on amenity grassland rather than on wildflower meadows or in woodlands), or offering wildlife alternative places to seek refuge (e.g. creating habitats more attractive than that where the activity is based or keeping them unlit/unused during a busy event).

Activities can result in more than one form of impact; ideally they would interact and balance/cancel each other out, but they can add together to exert a more severe effect on a site and its biodiversity - in other words they exert a cumulative impact. Cumulative adverse impacts can be far more harmful or destructive in that they often don't give wildlife time or opportunity to avoid one adverse impact before being hit by the next one, or that two impacts act together to increase the overall degree of harm, injury or distress.

In cases of a cumulative adverse impact, whilst removing every single factor that creates the impact might not be possible, action can be taken to try and remove as many as possible so the overall severity is lessened and resulting harm to wildlife reduced. An example is removing a dead or diseased tree outside the normal bird nesting season, or removing a potential bat roost in winter but only after a detailed bat survey has already been carried out on the roost or an alternative roost has been provided.

In planning an activity that could generate ecological impacts, such as a large event, an 'ecological risk assessment' is needed, and to do this the following principles must be followed:

1. Understand the site where the event or activity is located – gather as much information as possible on its biodiversity, its ecological status, what habitats/species are present and where they are located on site.
2. Identify the potential impacts an activity or event could generate, regardless of what they are and whether they are potentially adverse, beneficial or neutral.
3. Identify any other activities already taking place on site regardless of whether your own activity/event would occur or not – this will identify where an impact could be made worse by two activities happening at the same time, e.g. an area of the park used by wildlife as a refuge from the event is already being heavily used for sports or play.
4. For each impact, and from their scale, location, intensity and type, determine the degree of severity in terms of adverse ecological effects if they are simply allowed to happen – if they occur on site how severe will they be or how much damage will they cause?
5. Rank the impacts in scale of severity – this allows the potentially most damaging ones to be identified and eliminate those that won't cause significant damage or harm (they are still there but their effects are minor or can be contained).
6. For the most damaging impacts, what harm will they cause to wildlife and biodiversity, e.g. what could actually happen if nothing is done to avoid, minimise or contain that impact? These need to be tangible wherever possible rather than assumptions.
7. For the most damaging or harmful impacts, identify what practical actions must be undertaken to a) completely remove or eliminate them from happening, if at all possible (e.g. no works to any trees in the bird nesting season or avoidance of any wildflower meadows), or b) to reduce and minimise the severity of impact where it cannot be wholly eliminated (e.g. reduced hours for floodlighting or use of lighting that avoids UV and low-wavelength blue light emissions).
8. Produce a detailed Ecological Management and Mitigation Plan (EMMP) which will a) ASSESS: describe all of the potential ecological impacts resulting from the activity, b) EVALUATE: which impacts are the most severe in effect, as well as why, when and to whom they will harm, c) ELIMINATE: what practical actions will be implemented to completely remove the most harmful ecological impacts, d) MITIGATE: what practical actions will be implemented to minimise the degree of harm any remaining adverse ecological impacts exert, and e) IMPLEMENT: who will undertake these mitigations, how, when and with what will do this, and who will ensure they do it.
9. Ensure as part of the planning of the activity the EMMP is fully adopted and at the right stages, and there are clear lines of accountability to ensure what the EMMP states must happen actually does, and failure to comply has consequences for those delivering the activity.

B. Ecological and Landscape Impacts from Proposed Large Scale Events in Brockwell Park

Sites of Importance for Nature Conservation – Can Events Take Place in Them?

- Individual London Boroughs are enabled to designate specific sites within their boundaries as Sites of Importance for Nature Conservation (SINCs), usually in partnership with local residents and community groups, and the Greater London Authority. These sites are designated as SINCs because they contain features or habitats that are important for biodiversity at the London, borough or local level.
- SINCs are designated not just for their importance for nature conservation and biodiversity in terms of the plants, animals and habitats they contain, but also because they enable people to have access to and enjoyment of wildlife close to where they live, work or visit.

- SINC's can be designated as Metropolitan, Borough or Local depending on their relative significance for the whole or a particular part of London in terms of the wildlife they contain and how easy it is for people to access and use them to appreciate wildlife.
- However, SINC's are not nature reserves and should not be 'sealed off' from public access and use; they are living sites and people need to have as much access to them as possible, and they should be able to accommodate activities and events that the public use and enjoy. It is perfectly possible, and indeed preferable, that wildlife and people can coexist within a SINC.
- Some SINC's are not publicly accessible, such as railway linesides, but they are still actively managed and are designed to give people ecological benefit, such as when looking out of a window to appreciate nature when travelling on a train or by living next to the railway lines.
- Being a SINC, whether Metropolitan, Borough or Local, does not preclude a site from being used for events large or small. SINC's are used across London for sports and play, and it is perfectly possible for a SINC to host an event. For example, SINC's like Clapham Common, Crystal Palace Park, Hyde Park, Blackheath, Victoria Park, Trent Park and Alexandra Palace Park are all used for major events and also other activities like large running and sports competitions/festivals, and in some cases for a considerable period of time.
- However, as with any ecologically important site or any activity planned in them, of key importance is properly and thoroughly assessing what the activity is and what risks it might pose to the SINC, and then implementing a series of actions and other measures to eliminate as many risks as possible, then minimising the severity of harm from any remaining ones through appropriate mitigation or compensation.
- The higher graded the SINC the greater is its ecological importance and the potential sensitivity of habitats and species to activities that could be harmful, and this includes events. This means more attention is required to identifying the risks from the event and may mean any actions to prevent or minimise ecological harm have to be more comprehensive and thorough in detail.
- To summarise, events both large and small are not necessary prohibited from a SINC, provided appropriate measures are taken to assess the risk of ecological harm from them, and equally appropriate measures to eliminate or mitigate for these risks have been fully addressed before the event takes place, as well as during and after it. The more sensitive the SINC, the more thorough and extensive may be the mitigations required to protect the SINC and its contents.

Brockwell Park as a Site of Importance for Nature Conservation

- Brockwell Park is a Borough grade Site of Importance for Nature Conservation (SINC, Code SINC03) for the London Borough of Lambeth; it also contributes positively to the biodiversity of nearby London Borough of Southwark and is both a donor to and recipient of wildlife from surrounding sites, and well connected to numerous wildlife corridors that allow wild plants and animals to migrate in and out of the park.
- One of the main objectives of the park's management is to protect its existing wildlife assets, and ensure that its SINC status is retained and improved over time; where possible new features are created and existing ones are extended or enhanced.
- However, whilst the whole park is a SINC (as this is the way the determination of SINC's works), it is recognised that some areas of Brockwell Park are 'hotter' in terms of biodiversity in that they contain more habitats and other features that provide shelter, breeding sites and food for wild plants and animals.
- These areas tend to be on the western and southern sides of the park, such as the extensive rough meadow grassland in the south western quarter, the main ponds, the Walled Garden and Community Greenhouses and the smaller rough grass areas with scattered trees in the northern quarter between Brixton Water Lane entrance and the BMX/Redgra pitch.

- Of similar ecological importance for the park's SINC status are some sections of boundary habitat where the grass is left longer or there are clusters of deciduous trees and shrubs, such as along the boundaries with Brockwell Park Gardens, the southern half of Norwood Road, Brockwell Gate and Arlingford Road.
- There are some areas of Brockwell Park that, whilst still important for public amenity and enjoyment of nature, are more dominated by amenity grassland or more heavily used for activities that may deter or disturb wildlife, or limit the amount of time they spend on the ground foraging or breeding. This includes the central and north eastern quarters of the park, as well as the playground and the wet play area, especially when they are in full use during the summer season.
- Some boundary sections of the park, whilst they contain scattered trees and some sections of rough grassland, are heavily disturbed by human and dog activity or are close to busy roads where traffic noise and street/vehicle lighting can be intense, such as along the eastern section of Dulwich Road from the Lido and the northern half of Norwood Road.
- This general overview implies that positioning events in the north-eastern quarter of the park, with part of the central area being included, provided they are based on amenity grassland or hardstanding wherever possible, could exert a lesser impact upon biodiversity, not just within specific areas of the park but across the park as a whole. If appropriately positioned and properly managed such events might not necessarily impact adversely upon the park's overall biodiversity value and its Borough SINC status.

Sensitive Ecological Receptors – Protected Species and Priority Features

- Brockwell Park is home to or used by a wide range of species deemed of significant importance in terms of biodiversity, such as wild birds and bats; these species are also protected by law and cannot be deliberately harmed or killed, nor their habitats or homes disturbed or damaged. It also contains species that cannot easily be replaced on site or not widely found in other open spaces or parts of the borough, such as its fish populations in the ponds, its fungi and invertebrates.
- The park is also home to a range of habitats or wildlife features of considerable importance for the park and the borough's biodiversity, or which contribute significantly to its SINC status. This includes ponds, meadows, vertical or boundary features (e.g. old brick/stone walls or native hedges) and many trees, which are home to large assemblages of wild plants and animals.
- Inevitably, only a fraction of Brockwell Park's species and habitat diversity is fully understood in terms of location, abundance, sensitivity and importance; whilst this knowledge is being improved on and added to over time, caution must be applied when undertaking activities in the park in case they could impact adversely on something that is there but hasn't been seen or recorded.
- Nevertheless, some sections of Brockwell Park are of greater significance for sensitive habitats and species than others due to differences across the site in terms of habitats (type, extent and quality), and how they have evolved or are maintained. Bats use the ponds, Walled Garden and Greenhouses and the trees/long grass areas around them more frequently than other areas of the park, probably because they provide more and better foraging, feeding, roosting, protection and breeding resources.
- Areas of the park that are heavily lit, impacted by adjacent busy roads or used by the public for ground-based activities like sports, play or picnics would be less favoured by sensitive species due to disturbance plus the lack of suitable ground and boundary habitat. Such areas also won't offer ideal conditions for sensitive habitats in that the degree of interference and disturbance from other activities is too great, e.g. wildflower meadows next to areas used for sports or prone to trampling or picnics.
- Some features are of greater ecological importance than others; large mature trees will be favoured over newly planted ones, and older walls and buildings will be more attractive as they offer niches or voids to provide food or

shelter. More modern buildings that are well sealed or lit, or in constant use, will offer less attraction for sensitive species and limited habitat opportunity.

- Positioning an event in part of the park that is as far as possible from areas known or strongly believed to host or prove attractive to sensitive species or habitats can reduce the adverse impacts an event would have on such ecological assets.
- However, it is inevitable that there will, even if in the 'perfect location', be some degree of impact from an event on sensitive species or habitats such as from incidental lighting, litter, noise or vehicle movements.
- This means that there still needs to be a comprehensive assessment before an event as to what the adverse ecological impacts will be, especially on sensitive or protected species and the habitats/features they use or need. This then identifies what measures must be in place to eliminate or mitigate/minimise for any such impacts and guarantee that their degree of severity, if they occur before, during and after the event, are as low or as short term as is reasonably possible.
- Example mitigations include ensuring ponds and any watercourses/drainage systems are suitably protected from spills or seepage of sewage, waste (grey) water or other harmful liquids (e.g. fuel or detergents), or that lighting is correctly positioned to minimise avoidable light spill or leakage away from the events arena or egress routes, and lights are only on when absolutely necessary.
- Many wild species are remarkably tolerant of human activity provided it is suitably located, of limited or known duration, doesn't result in knock-on effects or makes other impacts more severe (the cumulative impact effect). Even sensitive or protected species like bats and birds can tolerate human-derived disturbance provided it can be contained and they find alternative routes to avoid or navigate around it. Assessing such issues and how to mitigate for them would be part of any detailed ecological impact assessment provided.
- For example, Brockwell Park is used by bats right throughout their active period and they forage around the more ecologically rich sections of the park, as well as display for breeding and territorial disputes. It is still uncertain if bats actually roost in the park, especially whether they breed or hibernate in specific trees or buildings; this issue will always be open to question unless constant and extensive surveys and intrusive inspections are undertaken which is probably not in the bats' best interests. If they don't roost on site and travel in from surrounding houses or other sites, probably the biggest challenge to bats is actually getting into the park across busy, well lit and noisy roads or railway lines.
- These particular challenges for bats coming into site would remain outside the scope and responsibility of any event in Brockwell Park, but ensuring an event is located so that as soon as bats are in the park they quickly pick up a 'dark safe' corridor to fly to their preferred foraging sites would mean the event itself was impact neutral on these bats and their welfare.

C. Conclusions

- Large events in public open spaces that are SINC's and contain sensitive or protected species/habitats can in principle take place without any long-term or significant adverse ecological impacts, just as other potentially harmful or disturbing activities like sports or dog walking can.
- However, this is entirely dependent on a thorough and detailed assessment being undertaken to determine whether a large event, placed in the north eastern/central sector of Brockwell Park, will have any adverse ecological impacts upon sensitive/protected species and habitats, and the park as a whole, and what they will be, how, why and when, plus what mitigations are necessary to remove or reduce any such impacts.
- Unless such an assessment is undertaken and prior to any event being agreed, this assumption of no risk or harm cannot be made. It is beholden on an event organiser, and any agency managing the event planning process, to

ensure that they demonstrate that this assessment has been undertaken and that its findings/recommendations are sufficiently robust to withstand internal and external challenge.

- At this stage, no such assessment has been undertaken as to the potential ecological impacts (adverse or beneficial) and the measures required to eliminate or mitigate for severe adverse impacts upon biodiversity. Whilst proper positioning and good event management, such as strict control on lighting, pollution, traffic and ground damage, can mitigate for ecological impacts, these need to be properly assessed and confirmed either that they don't or that actions still have to be in place to secure that objective.
- It will be essential, as part of any further steps in determining and permitting such large events, including any requests for planning consent, to ensure an adequate ecological impact assessment has been undertaken, one which can withstand both officer and public scrutiny/challenge.
- As consequence a suitably robust yet practical Ecological Management and Mitigation Plan (EMMP) will need to in place for each or all events, and that this is strictly complied with and open to appropriate monitoring and/or enforcement.

D. Other Ecological Observations

- Much debate has focused on the 'commerciality' of two of the proposed events in Brockwell Park and whether these would have significant ecological impacts on the park and its resident biodiversity.
- Any activity or event, no matter if 'commercial' or 'community' and no matter how big or small, can and will have an adverse ecological impact if nothing is done before, during and after that event/activity to prevent or mitigate for these impacts, or to ensure their degree of potential harm is minimised or eliminated.
- The Lambeth Country Show, which has run successfully in Brockwell Park for over 40 years, will have its adverse impacts including ecological ones. Setting up, running and breaking down a large event over two weeks at what must be one of the most important times of the year for species like foraging/nursing bats or breeding birds will have impacts upon these and other species. However, by positioning the event in the north eastern and central section of the park, and applying the same principles of assessing the ecological risks and then mitigating for them through appropriate actions, such impacts can be contained or properly managed.
- Up to 80,000 people on each day of the Country Show, plus the smoke, noise, traffic and footfall, along with people camping or parking cars in the park overnight, must cause disturbance for wildlife in the park. However, containing this to one weekend and applying appropriate ecological mitigations will ensure disturbance is time and place limited, and any after effects are avoided or suitably contained.
- Equally problematic for wildlife is the 'cumulative impact effect' mentioned previously. This doesn't just apply to the many impacts resulting from one single event, but also when there are multiple events close together. This means wildlife habitats and species may have difficulty recovering from the effects of one event before the next one comes along, or there isn't enough time for habitats to be reinstated to a condition that can be used or is fit for purpose.
- Running too many large events with many impacts can, even if properly managed, interact together to worsen their effect and are likely be more detrimental to wildlife that just one large event. Again, an ecological impact assessment would be required to look at all events planned for one site and identify if they could have cumulative adverse impacts, especially if there isn't sufficient time between events to allow for species and habitat recovery. Protected or sensitive species like breeding birds or bats would be main receptors of such cumulative impacts, and the assessment would ensure they are fully included and assessed.
- The ecological impact assessment would also need to look at the adverse impacts if habitat reinstatement or recovery isn't to the required standard, and what actions need to be secured and in place to ensure satisfactory reinstatement or provide alternative and compensatory habitat or areas whilst reinstatement was taking place.

- Lambeth’s Environmental Compliance Officer would check through any ecological assessments provided and offer feedback.

E. Observations on Stakeholder Comments

Damage to Park

“Brockwell Park is also designated a site of borough importance for nature conservation, and is designated metropolitan open land. According to the Lambeth Open Space Strategy Addenda (prepared by URS Consultants, 2013), linked below, Brockwell Park is designated as a major park, a 70-80 quality score (the highest standard), the least vandalism, but is in one of the most deprived areas (lowest score, 0-20 percent bracket).

If the weather is wet, there is likely to be significant damage to the park, to the grass, and wildlife. Festivals do bring considerable damage. I would like to hear how Lambeth have inspected other parks, such as Victoria Park and Hyde Park, to compare the damage there, especially when Lambeth’s plans consider the site of borough importance for nature conservation.

Significant investment has been made by heritage lottery funds to improve the drainage in the park, but the area is still significantly muddy. Would 45,000 people jumping on the land cause compaction, and possibly damage the drainage? Would tree roots become impacted and therefore damaged? It is also worth noting that at the last large festival in the park, Sunfall, several benches were vandalised, as was the model railway, and at 1am after Sunfall, a car crashed at high speed into the railings by the lido, which have not been repaired since, leaving lasting damage (most likely associated with a Sunfall reveller or worker).”

- Any activity in any park, if the weather is wet, can cause ground damage or damage to drains and watercourses. It is how measures are taken before, during and after an activity, including ground reinstatement, which determine how damaging or persistent these effects are or whether they have short- or long-term impacts on biodiversity. A detailed ecological risk assessment, coupled with a robust EMMP, can identify the risks and how they will be eliminated and mitigated for, including from wet weather and ground damage.
- Locating an activity in part of a site where the dominant ground cover is hardstanding or amenity grass can reduce the risk of damage to sensitive habitats like meadows or wetlands, and the complexity and costs of reinstatement will be lower.
- Careful positioning of an event so that it avoids areas with large numbers of trees, and in ensuring tree root protection zones (RPZs) are in place around all trees within or immediately next to an event site can further reduce the risk of tree root damage.

Biodiversity Duty

“There is a duty on local authorities to take account of biodiversity in local plans and services, as specified in Section 40 of the Natural Environment and Rural Communities Act 2006: ‘public authorities should consider how wildlife or land may be affected in all the decisions that they make.’

Brockwell Park is a Site of Importance for Nature Conservation (SINC) Borough Grade 1 in Lambeth’s Local Plan; the entire park is designated and the biodiversity duty unquestionably applies. Lambeth has not taken account of this in the events strategy, and with no mention of ecology in the current proposals for Brockwell Park.

Lambeth describes Sites of Borough Importance for Nature Conservation on its planning policy website: ‘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. Further information on SINC's can be found in our [Local Plan](#), in particular policy EN1.'

Lambeth appears to be proposing two events which would cause damage to Brockwell Park, hence in its own words initiating a significant loss to the borough. Even more significantly, the proposals being considered deny access to a substantial portion of this site, an even more significant loss to the borough. As highlighted earlier in this report, the area is in the 90th percentile of most deprived areas of the UK, measures include quality of the natural environment."

- Section 40 of the Natural Environment and Rural Communities Act (NERC) 2006 places a duty on all public bodies to give due consideration to how wildlife or land may be affected by the decisions they undertake. This duty doesn't mean activities like events are prohibited from land that they manage, but that as part of the event planning and management processes, fair and due consideration is given to the needs of wildlife.
- This emphasises the need for large events in any park to undertake a detailed ecological risk assessment and provide/implement an EMMP where there are impacts that might be severe and cause ecological harm. Likewise, the EMMP will identify what actions are undertaken to reinstate any damaged ground or features so that any that are used by wildlife are returned to their original condition or replicated elsewhere.
- One outcome of this current discussion and debate may be to provide an addendum to the Lambeth Events Strategy that sets out what measures are in place to assess events, regardless of location or size, as to their potential ecological impacts. Where impacts are found to be adverse and potentially harmful to biodiversity, this can then identify the measures that will be required of an event or its applicants to ensure compliance with the council's duty of care in terms of the NERC Act and its protection of the borough's wildlife assets.

Protection of Wildlife Species by Law

"There is abundant wildlife in Brockwell Park, as noted in Lambeth's nature trail leaflet. Local MP Helen Hayes is a Species champion of the Pipistrelle bat. Bat species recorded in the park include Pipistrelle, Noctule, Daubenton's, Leisler's, and Serotine, all of which are from protected by law from disturbance. Bird species recorded include House Sparrow, Nuthatch, Great-spotted Woodpecker, Green Woodpecker, Goldcrest, Common Whitethroat, Blackcap, Chiffchaff, Greenfinch, Chaffinch, Whinchat, Common Redstart, Redwing, Meadow Pipit, Peregrine Falcon, Kestrel, Hobby, Sparrowhawk, Swift, Swallow, House Martin. All of these are protected from disturbance during their nesting season (peak period February to July), legally protected until August.

According to Government guidance "these activities can affect wild birds, particularly during breeding season: trimming or cutting trees, bushes, hedges and rough vegetation; renovating, converting or demolishing a building; creating disturbance, e.g. noise, lighting and vibration"

- It is not disputed that any of the species described above are protected by law, as are their homes such as nests or roosts. It is also not disputed that any activity, no matter its type, size, location or duration, can disturb and affect wild birds and bats – even walking dogs, running, playing football or running a miniature railway exert some degree of disturbance.
- It is how an event is designed, located and managed that determines the degree of disturbance and harm to protected species, and then determines what measures are required to remove or reduce the level of harm through appropriate mitigation. This is a key element of any EMMP, the terms and conditions of any events licence, and any planning consents if this was also required.
- Careful positioning or timing of an event, so as to avoid areas or features used by protected or sensitive species, as well as measures to reduce any direct/indirect effects on such areas, e.g. reduced lighting or noise controls, will

be part of the programme of actions required to demonstrate how the risk of harm to or disturbance of such species is being addressed and minimised/avoided.

- All protected species using a public park or open space will always be at risk of some form of disturbance; it is how any new forms of disturbance are managed so the cumulative adverse impact from them is kept as low as possible which is critical.

Capacity and Seasonality

“We already have one major event regularly held in this nature site of borough importance. The Lambeth Country Show, while causing some damage, is to a certain extent appropriate for this site, this is because it promotes access to nature; it gives all our city children and adults a rare chance to encounter farm animals, horses, horticulture, plants, wildlife charities, vegetable personalities, falconry and bee hives. It is freely open to all, it is held relatively late in the year, in July. This allows a certain range of wildlife to get through the active spring element of their lifecycle, including birds fledging, and grasshoppers hatching and mating. It was previously held in August, which is to be honest, a better time for it. It does not involve any disturbance at night (8pm curfew).”

- See previous comments. The Lambeth Country Show like all large events will exert some degree of disturbance to wildlife including protected species. Although open to the public for just two concurrent days it still takes up to two weeks for the whole event to be set up and broken down. This means that its full and cumulative impact upon biodiversity can be much longer than the public at first assume.
- It is how the Country Show is managed and how adverse ecological impacts are mitigated for that determines how much harm it would cause to the wildlife of Brockwell Park. Again, a detailed ecological risk assessment and an EMMP will identify the risks and then how these will be addressed to remove or reduce them.
- Running any large event with up to 150,000 people over one weekend can cause as much harm to wildlife if it was taking place in July as it would in August – wildlife is active throughout the year and different times can result in different impacts and on different species or habitats. It is how any impacts are identified and then managed or mitigated for that is important.