19 BEACON CLOSE, UXBRIDGE

PRELIMINARY ECOLOGICAL APPRAISAL & PRELIMINARY ROOST ASSESSMENT

A Report to: London Mortgage Group

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1. INTRODUCTION

1.1 BACKGROUND

In February 2023, London Mortgage Group commissioned MMEcology to undertake a Preliminary Ecological Appraisal and Preliminary Roost Assessment at 19 Beacon Close in Uxbridge. This assessment is required to inform a planning application associated with the demolition of the existing dwelling and its replacement with more residential units.

To fulfil the above brief, it was necessary to assess the existing ecological interest of the site and appraise the potential for the buildings on site to support roosting bats. Therefore, a walkover survey and a bat roost assessment were undertaken on 8 February 2023.

1.2 SITE DESCRIPTION

The application site is located at the bottom of Beacon Close and is a single-storey bungalow with a detached garage and a private rear garden. It is centred at National Grid Reference TQ 05842 85311. The property was occupied at the time of survey and the garden is mainly covered by amenity grassland with a small number of trees, small areas of ornamental planting and boundary hedgerows.

The application site is situated within a semi-urban setting, surrounded by residential buildings and their private gardens to all sides. Beacon Close is located to the north of the existing building. Approximately 45m to the west of the site is a large rectangular grass field, beyond which is Fray's River and Uxbridge Alderglade Nature Reserve.

Figure 1 below shows the site location plan with Figure 2 showing the location of the site in the wider landscape.

Figure 1. Site location plan

Figure 2. Location of the application site in the wider landscape (Source: Google maps)

2. METHODOLOGIES

2.1 DESK STUDY

An ecological desk study was undertaken to determine the presence of any statutory and non-statutory designated nature conservation sites within a 1km radius of the site. Due to the nature of the proposals (replacement housing) and small scale of the works, protected species records were not requested and this is considered to be proportionate. The data search involved contacting appropriate statutory and non-statutory organisations which hold ecological data relating to the survey area. MMEcology then reviewed the desk study data provided by the below organisation.

- Natural England - MAGIC (Multi-Agency Geographic Information for the Countryside) website for statutory conservation sites.

The desk study included a search for European statutory nature conservation sites, UK statutory sites and non-statutory local designations.

The desk study also included a review of relevant local planning policy with regard to biodiversity and nature conservation.

2.2 PHASE 1 HABITAT SURVEY

The walkover survey was conducted following the Phase 1 Habitat Survey methodology of the Joint Nature Conservation Committee (JNCC, 2010) and the Institute of Environmental Assessment (IEA, 1995). Phase 1 Habitat Survey is a standard technique for classifying and mapping British habitats. The aim is to provide a record of habitats that are present on site. During the survey, the presence, or potential presence, of protected species was noted.

Based on the Guidelines for Ecological Impacts Assessment in the UK and Ireland (CIEEM, September 2018), valuation involves assigning a receptor to a geographic frame of reference, i.e. International, UK/National, Regional, County, and District, Local or Parish so that the level of weight or importance attached to any impact can be appropriately assessed. Therefore, each receptor on site was appointed a value.

An impact assessment was then carried out based on the proposals known for the site at the time this report was produced. This involved identifying impacts, incorporating measures to avoid and mitigate negative impacts and identifying opportunities for ecological enhancement, in accordance with the National Planning Policy Framework.

2.3 PROTECTED AND NOTABLE SPECIES APPRAISAL

A preliminary appraisal of the site to support protected and notable species was carried out. During the walkover survey, the potential presence of the following species was assessed:

Badgers *Meles meles*
An assessment of the habitats on site was undertaken to identify the suitability of the site for use by foraging and sett building badgers. This takes the nature of the surrounding landscape and connectivity with other areas of suitable habitat into account. The site was therefore subject to a comprehensive walkover assessment for the presence of badger field signs such as badger setts, footprints, runs, hairs, snuffle holes and latrines. Any signs recorded were plotted on a map. Any setts found were classified according to the criteria used in the National Badger Surveys.

Reptiles
An assessment of the suitability of the site to support reptile species was undertaken, based on a review of habitat characteristics and other parameters known to influence reptile distribution such as site management and disturbance, vegetation structure, presence of refugia and potential hibernation habitat and connectivity to surrounding habitats of potential value to reptiles. Reptiles particularly favour scrub and rough grassland interfaces and the presence of these is a good indication that reptiles may be present on-site. In addition, reptiles may utilise features such as tussocky grassland for shelter and compost heaps and rubble piles for hibernation.

Great Crested Newts *Triturus cristatus*
Available ordnance maps were reviewed to identify the potential presence of waterbodies within a 250m radius of the site. Particular attention was paid to the presence of suitable connective, habitat linking the application site and the waterbodies. Any ponds separated by the presence of barriers to their dispersal such as busy roads (e.g. A roads) and running water (e.g. rivers) were subsequently scoped out.

Dormice *Muscardinus avellanarius*
A habitat and connectivity survey were conducted to determine the likelihood of dormouse being present within the site. This involved a walkover assessment of the site and the immediate environs. Particular attention was paid to the presence of key food sources such as hazel *Corylus avellana*, presence of large gaps in the vegetation, structural diversity of the habitats on site, presence of understorey habitat and connectivity to adjacent areas of woodland/scrub.

Nesting Birds
An assessment of the suitability of habitats present to support nesting bird communities, the presence of bird species that may potentially nest within the available habitat and evidence of nesting such as old or currently active nests was carried out.

Invertebrates
An assessment was made of the suitability of the site to support invertebrates. The assessment was based on the presence of habitat features which may support important invertebrate communities. These features include an abundance of dead wood, the presence of diverse plant communities, varied woodland structure, sunny woodland edges with a diverse flora and waterbodies.

Water voles *Arvicola amphibius*
A visual assessment of any water bodies within or adjacent to the site boundary, to determine suitability to support water voles, was carried out in accordance with the specifications detailed by Dean et al. (2016). Any signs of water vole presence, such as burrows, feeding stations and latrines encountered were recorded.

Other Species
An assessment was made of the sites' suitability for notable species, Species of Principal Importance for the Conservation of diversity in England notified under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and as listed in the England Biodiversity List, and Local Biodiversity Action Plan (LBAP) species, such as hedgehogs *Erinaceus europaeus*.

Invasive Species
During the field survey, any invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) such as Japanese knotweed *Fallopia japonica* and giant hogweed *Heracleum mantegazzianum* were recorded and mapped.

2.4 PRELIMINARY BAT ROOST ASSESSMENT

In line with the specifications detailed in Bat Mitigation Guidelines (English Nature, 2004) and Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2016), a Preliminary Roost Assessment of the buildings on site was conducted. The Preliminary Roost Assessment was carried out on 8 February 2023 by Maral Miri, Principal Ecologist, MSc, MCIEEM, CEnv, Natural England Level 2 bat class licence holder. A visual assessment was undertaken to determine the presence of any Potential Roost Features (PRFs), together with a general appraisal of the suitability of the site for foraging and commuting bats. Example of PRFs include behind hanging tiles, weatherboarding, soffit boxes, lead flashing and between tiles and the roof lining.

Any accessible PRFs were inspected using binoculars, a torch and endoscope for evidence of possible bat presence. The building on site was surveyed externally and internally.

Based on the PRF's present, the building on site was assessed using the suitability classes detailed within the Good Practice Guidelines (Collins, 2016), as detailed in Table 1.

Suitability	Description
High	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.
Moderate	A structure with one or more potential roost sites that could be used by bats, but unlikely to support a roost of high conservation status.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. 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 larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).
Negligible	Negligible habitat features on site likely to be used by roosting bats.

Table 1. Classification for bat roost suitability

3. POLICY

3.1 NATIONAL PLANNING POLICY FRAMEWORK

The revised National Planning Policy Framework (NPPF) has been adopted since March 2021. Paragraph 180 of the adopted NPPF states "*when determining planning applications, local planning authorities should apply the following principles:*

a) *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;*
b) *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
c) *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and,*
d) *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity."*

3.2 LOCAL PLANNING POLICY

The London Plan (2021)
Policy G7 of the London Plan states that development proposals should ensure that, wherever possible, existing trees of value are retained.

Hillingdon Local Plan: Part 2 - Development Management Policies (2020)
Policy DMEI 7 'Biodiversity Protection and Enhancement' of the Local Plan states:

"A) The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.

B) If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.

D) Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused."

4. DESK STUDY RESULTS

4.1 STATUTORY DESIGNATED SITES

There are two statutory designated sites located within a 1km radius of the development site. These include Frays Valley Local Nature Reserve (LNR) and Fray's Farm Meadows Site of Special Scientific Interest (SSSI), located approximately 340m north-west of the application site, designated for being one of the last remaining examples of relatively unimproved wet alluvial grassland in Greater London and the Colne Valley. The meadows contain a variety of grassland communities which range from the grazed grassland of sweet vernal-grass *Anthoxanthum odoratum*, crested dog's-tail *Cynosurus cristatus* and perennial rye-grass *Lolium perenne* through to areas of tall sedge dominated marshy grassland with lesser pond sedge *Carex acutiformis* and reed-grass *Glyceria maxima*. The linear features of the site - ditches, hedges and railway embankment - add further habitat diversity, and contribute to the richness of plants and animals present. In addition to the commoner sedges and grasses, the meadows contain a number of species characteristic of old grassland such as lady's smock *Cardamine pratensis* and large bird's trefoil *lotus uliginosus*. Also found are plants like ragged robin *Lychnis flos-cuculi*, and marsh marigold *Caltha palustris* which are becoming increasingly uncommon in the London area due to habitat destruction. Purple loosestrife *Lythrum salicaria* and common skullcap *Scutellaria galericulata* grow along ditch banks while water plantain *Alisma plantago-aquatica*, water cress *Rorippa nasturtium-aquaticum*, water forget-me-not *Myosotis scorpioides* and amphibious bistort *Polygonum amphibium* are amongst the common plants in the ditches. The Fray's River has a similar flora to the ditches but also includes arrow-head *Sagittaria sagittifolia*. The entomological interest of the site is well documented with a good variety of dragonflies and butterflies recorded from this section of the Colne Valley. The meadows also provide good cover for waders and wildfowl throughout the year and wintering species include Jack snipe, snipe, lapwing, teal and shoveler. With the loss of washland areas throughout London, the site becomes increasingly valuable as a relict habitat. The location of these designation is shown in Figure 3 below.

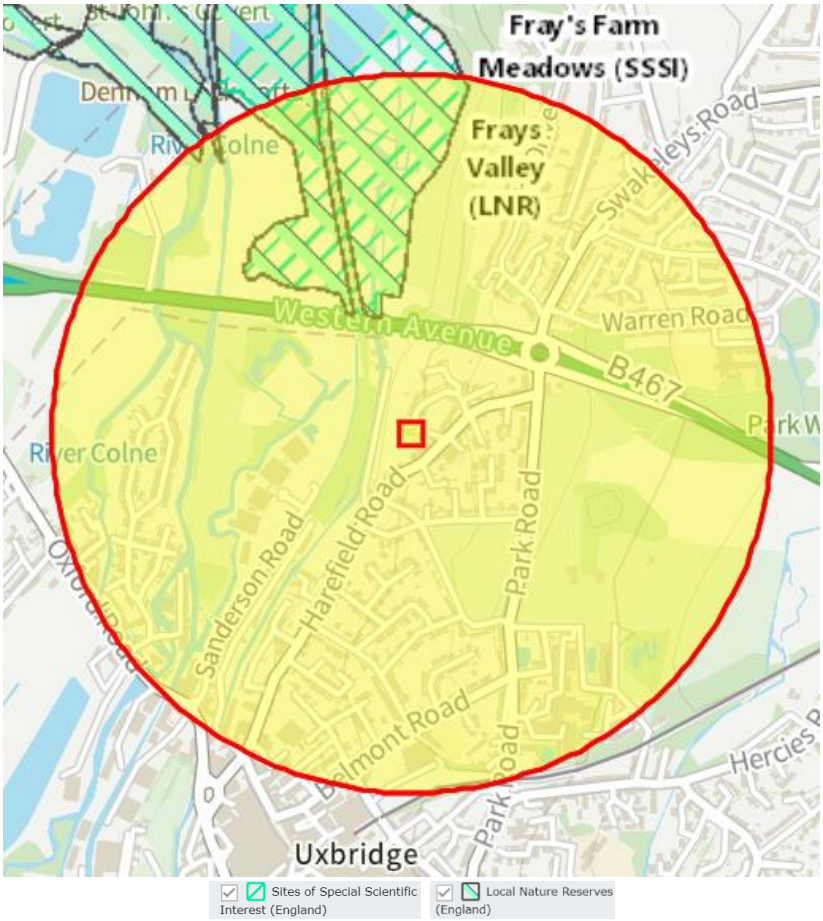

Figure 3. Location of the statutory designated sites within 1km radius of the site (Source: MAGiC Interactive Map)

4.2 NON-STATUTORY DESIGNATED SITES

The nearest locally designated site present within a 1km radius of the site is Alderglade Nature Reserve and Frays Farm, which is a designated Nature Conservation Site of Local Importance (SINC). This SINC is located approximately 90m west of the application site and is designated for supporting an area of wet woodland and marshland along an old disused railway embankment. The trees are dominated by mature crack willow, hawthorn scrub and alder. Several species of bat, including the uncommon Brandt's bat have been recorded, along with bird species such as siskin, kestrel, kingfisher, coal tit, great spotted woodpecker, redwing and sparrowhawk. Water voles are also known to be present.

5. PHASE 1 HABITAT SURVEY

5.1 HABITATS

The Phase 1 Habitat survey of the site was carried out on 8 February 2023 by Maral Miri, Principal Ecologist, MSc, CEnv, MCIEEM, holder of Level 2 bat class licence, Level 1 great crested newt and dormouse licences from Natural England, with over 16 years of experience as a professional ecologist within both the private and public sector.

The following habitat types were recorded on site during the field survey.

Buildings and Hardstanding
There are three buildings on site, comprising an occupied dwelling, a detached garage and a small garden shed. For full details of the buildings on site, please refer to Section 5.3.

The value of built structure is dependent on its suitability to support protected species such as roosting bats and nesting birds and is therefore further discussed in Section 5.3.

Within the front and rear garden are areas of hardstanding in the form of paved walkways, concrete car parking area and paving slabs.

Figure 4. Example of areas of hardstanding on site

Amenity grassland
The rear and front garden are covered by areas of managed amenity grassland which supported a very short sward height at the time of survey due to its strict management regime. The species recorded within this habitat include perennial ryegrass *Lolium perenne*, red fescue *Festuca rubra*, yarrow *Achillea millefolium*, common bent *Agrostis capillaris*, mosses and creeping thistle *Cirsium arvense*.

Figure 5. View of amenity grassland on site (rear garden)

Figure 6. View of amenity grassland on site (front garden)

Amenity grassland on site is of low ecological value due to its poor species diversity, regular management regime and lack of structural diversity. This habitat is common and could be easily created. Therefore, it is appointed a ‘site’ value only.

Introduced Shrubs

Small areas within the rear garden and front garden included ornamental planting such as Euonymus *Euonymus spp.*, roses *Rosa spp*., Yucca, rhododendron, leatherleaf viburnum *Viburnum rhytidophyllum*, palm, lavender *Lavandula angustifolia*, elephant ears *Bergenia cordifolia Purpurea*, pendulous sedge *Carex pendula* and bulbs.

Figure 7. Example of ornamental planting on site

Figure 8. Example of ornamental planting on site

Figure 9. Example of ornamental planting on site

Overall, this habitat is of limited extent on site and mainly non-native. Therefore, it is appointed a ‘site’ value only.

Pond

A small plastic pond, approximately 0.5 x1m is present within the rear garden and is devoid of any marginal or aquatic vegetation.

Figure 10. View of the pond on site

Due to the small size, construction type and lack of any vegetation, this habitat is of limited value and is appointed a ‘site’ value only.

Hedgerows

The southern and western boundaries of the rear garden are lined by a managed cherry laurel *Prunus laurocerasus* hedge, approximately 1.5m tall.

Figure 11. View of the hedges on site

Cherry laurel is a non-native species and therefore is considered to be of ‘site’ value only.

Scattered Trees

A small number of trees are present within the boundaries of the rear garden, including cypress species *Cupressus sp.,* a holly *Ilex aquifolium* and a palm tree.

Figure 12. View of the trees on site

Figure 13. View of the trees on site

Due to the condition of the trees on site and their non-native nature, they are appointed a ‘site’ value only.

5.2 PROTECTED SPECIES

Based on the nature of the habitats present on site, the following protected/notable species were considered during the survey:

Nesting Birds
The dwelling and trees on site have some suitability for supporting common and widespread bird species. No bird's nest was recorded on site at the time of survey. Nevertheless, nesting birds are a notable consideration in relation to the proposals and a recommendation is made in Section 7.

Roosting Bats
The dwelling on site provides suitable roosting opportunities for bats. Bats are therefore considered to be a notable consideration in relation to the proposed works and therefore further recommendations are made in Section 7. For further details, refer to Section 5.3.

Foraging and Commuting Bats
The habitats within the rear garden of the application site are small and dominated by areas of amenity grassland and a small number of trees. Due to the size of the habitats on site and their diversity, they are considered to be of limited value to foraging bats, with better quality habitats such as Alderglade Nature Reserve and Frays Farm SINC located approximately 90m west of the site. Therefore, foraging and commuting bats are not considered to be a notable consideration in relation to the proposed works.

Reptiles
The application site is dominated by buildings, areas of hardstanding and managed amenity grassland and therefore lacks the structural diversity required for foraging and sheltering reptiles. Reptiles are therefore not considered to be a notable consideration in relation to the proposals.

Amphibians (Great crested newts)
Review of the OS mapping indicates the absence of any ponds within a 250m radius of the site. The nearest waterbody to the site is Fray's River which has a flow and therefore not deemed to be suitable for this species. Therefore, great crested newts are not considered to be a notable consideration in relation to the proposals.

Badgers
No evidence of badgers was recorded on site. Badgers are therefore not considered to be a constraint in relation to the works.

Invertebrates
The habitats on site are only of value to common invertebrate species. Therefore, notable invertebrates are not considered to be a notable consideration in relation to the proposals.

5.3 PRELIMINARY ROOST ASSESSMENT

Building 1 (Main Dwelling) – External Inspection

The occupied dwelling on site is a detached, single-storey building with a hipped roof, covered by clay tiles. The walls are of yellow brick construction with part of the front elevation covered by decorative stonework. The brickwork is in a good state of repair with no cracks, holes or areas of missing mortar recorded. A conservatory is also located along the rear elevation, with a small lean-to greenhouse present along the north-eastern elevation. A small extension with a flat roof covered by roofing felt is present along the eastern elevation. The roofing felt is in a good condition and tightly sealed along the edges.

Figure 14. View of the front and rear elevation of the dwelling on site

Figure 15. View of side elevations of the dwelling

Figure 16. View of the roof of the single storey extension in the east

The roof tiles are generally tightly fitted with the exception of two areas, one within the front elevation next to the base of the brick chimney supporting two lifted tiles and the other along the rear elevation, comprising a small number of lifted tiles. The bonnet and ridge tiles appear to be intact with no areas of missing mortar recorded. The uPVC soffit is also tightly secured with no gaps recorded along the eaves. The brick chimney is in a good state of repair with the lead flashing around the base tightly fitted.

Figure 17. Example of tightly fitted roof and ridge tiles

Figure 18. Example of tightly fitted roof and bonnet tiles

Figure 19. Example of tightly fitted roof and ridge tiles

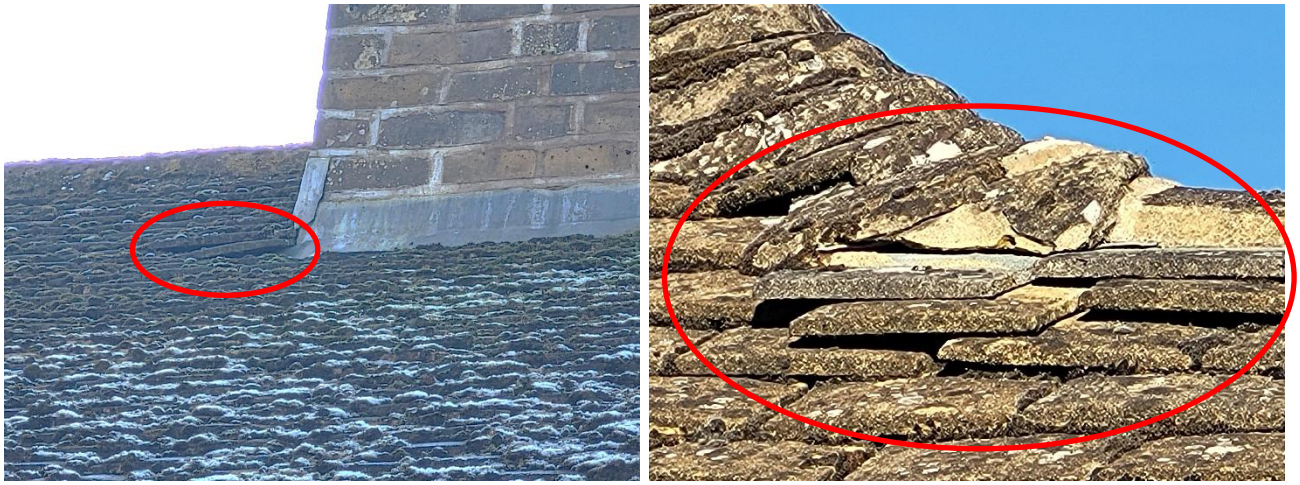

Figure 20. Lifted tiles – front elevation (left) - Lifted tiles – rear elevation (right)

Figure 21. View of the soffit

Overall, due to the small number of PRFs or potential entry points into the loft recorded at the time of survey in the form of a small number of lifted roof tiles, the main dwelling on site is considered to be of low potential for roosting bats.

Building 1 – Internal Inspection

Internally, a single loft space is present. The floor to apex heigh is approximately 2m high and there is underlay in the form of roofing felt present between the timber rafters and the roof tiles, which is in a good condition with no tears, cuts or areas of sagging recorded. The floor is boarded and insulated. A ridge beam is also present, along with a chimney breast. During the survey, an old wasp's nest and a small number of rodent (mouse) droppings were recorded within the loft void.

Figure 22. Internal view of the loft

Figure 23. View of the roofing underlay between the rafters and the roof tiles

Figure 24. View of the roofing underlay between the rafters and the roof tiles

Figure 25. View of the old wasp nest and mouse droppings

During the internal inspection of the loft, no evidence of bats in the form of droppings, feeding remains, urine staining, etc. was recorded.

Building 2 (Garage)

A detached garage is located to the north-east of the dwelling. This single-storey outbuilding supports brick walls and a flat roof, covered by roofing felt which is in a good condition and tightly sealed along the edges. This building is therefore appointed a negligible potential for roosting bats due to lack of any PRFs.

Figure 26. View of the garage and its roof

Building 3 (Shed)

A small wooden shed is located in the corner of the rear garden. This outbuilding supports a pitched roof covered by roofing felt and is tightly sealed with no potential for roosting bats.

Figure 27. View of the garden shed

5.4 Assessment Of Buildings On Site

Building 1, the main dwelling on site, supports a small number of PRFs and therefore is appointed a low potential for roosting bats.

Building 2, the garage, and Building 3, the garden shed, are considered to have negligible potential for roosting bats due to the absence of any PRFs. Therefore, Buildings 2 and 3 are considered to have negligible potential for roosting bats.

6. IMPACT ASSEESMENT

6.1 SUMMARY OF PROPOSALS

The proposals include the demolition of the existing dwelling and garage and construction of replacement dwellings with car parking and landscaping areas.

6.2 NATURE CONSERVATION SITES

Due to the large distance, nature of the proposals (i.e. replacement dwellings), habitat types present on site (dominated by buildings and amenity grassland), small scale and contained nature of the works, no impacts are anticipated on the statutory designated nature conservation sites.

Whilst Alderglade Nature Reserve and Frays Farm SINC is located 90m west of the application site, due to the small scale of the works, presence of buffers in the form of another dwelling and its private garden and a grass field and contained nature of the works limited to the site boundary only, no direct or indirect impacts on this locally designated site as a result of the proposals is considered likely.

6.3 HABITATS

The proposals will result in impact on existing buildings on site, areas of hardstanding, amenity grassland, ornamental planting, the small plastic pond and some of the trees on site which are of low ecological value. However, to ensure an overall net gain in biodiversity, in accordance with the local policy and National Planning Policy Framework, a number of recommendations for habitat creation are made in Section 7.

6.4 PROTECTED SPECIES

Nesting Birds

If the works are undertaken within the nesting bird season, the building works and any tree felling have the potential for impact on nesting birds. As such, a recommendation is made in Section 7.

Reptiles and Amphibians

Due to the absence of any suitable habitat on site, no impacts on this group of species is anticipated.

Bats

All UK bat species are European protected species and are capable of being a material consideration in the planning process. Building 1 (main dwelling) is considered to have low potential for bats; therefore, a recommendation is made in Section 7.

7. RECOMMENDATIONS

7.1 HABITATS

- To ensure a net gain in biodiversity, it is recommended that any new areas of lawn in the rear garden is sown with a flowering lawn mixture such as Emorsgate EL1.

- A number of native and/or fruit bearing scrub and trees are recommended to be planted in the garden, such as field maple *Acer campestre*, crap apple *Malus sylvestris* and cherry *Prunus sp*..

- Each new dwelling is recommended to incorporate a single integrated bat feature such as a bat brick.

- Each new dweling is recommended to incorporate a single integrated bird feature such as a sparrow box.

7.3 PROTECTED SPECIES

Nesting Birds

Any works to the buildings and any tree felling works are recommended to be undertaken outside the nesting bird season. The nesting bird season is weather dependent but generally extends between March and end of August. If this is not possible, then the buildings should be checked by an experienced ecologist for nesting birds immediately prior to works commencing. If birds are found to be nesting, any works which may affect them would have to be delayed until the young have fledged and the nest has been abandoned naturally.

Roosting Bats

As the main dwelling on site has been identified to have low potential for roosting bats, in line with current Good Practice Guidelines published by the Bat Conservation Trust (Collins, 2016), a single dusk emergence survey will be required during the peak bat activity season which runs from May to August, to confirm the presence or likely absence of a bat roost within the building.

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