Brooks Ecological

An **Origin Enterprises** Company

# Land off The Common, West Drayton

## Preliminary Ecological Appraisal Report

Report Ref. ER-9122-01

19/03/2026

Sir Lad Properties c/o Swan Environmental

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| **Report reference** | **ER-9122-01 – Preliminary Ecological Appraisal Report** |
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| **Date** | 19/03/2026 |
| **Report duration** | In accordance with CIEEM (2019), unless otherwise stated the findings of this report remain valid for a period of 18 months. After this period advice should be sought on the scope of any updating work required. |



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## Contents

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## Summary

This report is produced to inform Sir Lad Properties c/o Swan Environmental of potential ecological constraints and the need for further reporting or output to support a planning application associated with works at a site off The Common, West Drayton. In this instance, works are complete at the Site and this report will inform a retrospective application.

This report is based on a desk study of designated wildlife sites and records of protected or notable species, and an extended Phase 1 Habitat Survey carried out in March 2026.

**Key Findings**

The Site is now almost entirely occupied by gravel hard standing supporting minimal vegetation. A single very large oak has been retained to the front of the site, while a standing monolith (c.3.5m) of indeterminate species is retained on the southern boundary. The Site is now found to be of very limited ecological value, though it occupies a position between the River Colne and Maryfields Lake and would likely have previously provided habitat of reasonable value.

**Biodiversity Net Gain**

Details on measurement of the Site's biodiversity and the implications of complying with the requirement to provide a net gain for biodiversity are provided in our separate report ER-9122-01. Given the site was cleared prior to planning permission being granted, as per guidance, the BNG position is calculated using assumed habitats from prior to clearance, and therefore does not reflect the habitat types reported here.

**Further surveys**

Further surveys have not been recommended.

# Introduction

1. Brooks Ecological Ltd was commissioned by Sir Lad Properties c/o Swan Environmental to carry out a Preliminary Ecological Appraisal (PEA) of Land off The Common, West Drayton, grid ref. SK606904. The survey includes land within the red line boundary shown in Figure 1, opposite.

2. This report is produced with reference to British Standard BS:42020 'Biodiversity Code of Practice for Planning and Development' and the CIEEM (2017) Guidelines for Preliminary Ecological Appraisal.

## Purpose of a PEA

3. A PEA is intended to be an *initial assessment* of the baseline for a proposed development site and establishes whether the Site is likely to be constrained by ecology, and whether more information is needed to identify the ecological baseline.

4. The subsequent Preliminary Ecological Appraisal Report (PEAR) is intended to give guidance to a developer and assist with the early stages of project planning and design. Where a site is not complex or constrained, and no additional ecological input is necessary, the PEAR *may* be sufficient and suitable to support a planning application. In this case, the site has already been subject to works and the PEAR makes assumptions on impacts.

5. Biodiversity Accounting metrics are used separately to quantify the value of a Site in Biodiversity Units, which helps in the later stage of assessing the ecological impacts of the proposed development. This process is set out separately in the Biodiversity Gain Report which accompanies this PEAR.

## Proposals/Reason for PEA

6. In this case, work has already been completed at the Site, and this report is therefore intended to inform a retrospective planning application. The Site has been cleared with gravel hardstanding spread over the surface.

## The Site

7. The application site 'the Site' comprises what appears to have been extensive gardens associated with the retained residential property on site. For the purposes of metric calculations, the Site area has been measured using GIS against the provided red line boundary as 0.5ha.

**Figure 1** The Site (red line boundary).

# Desk Study

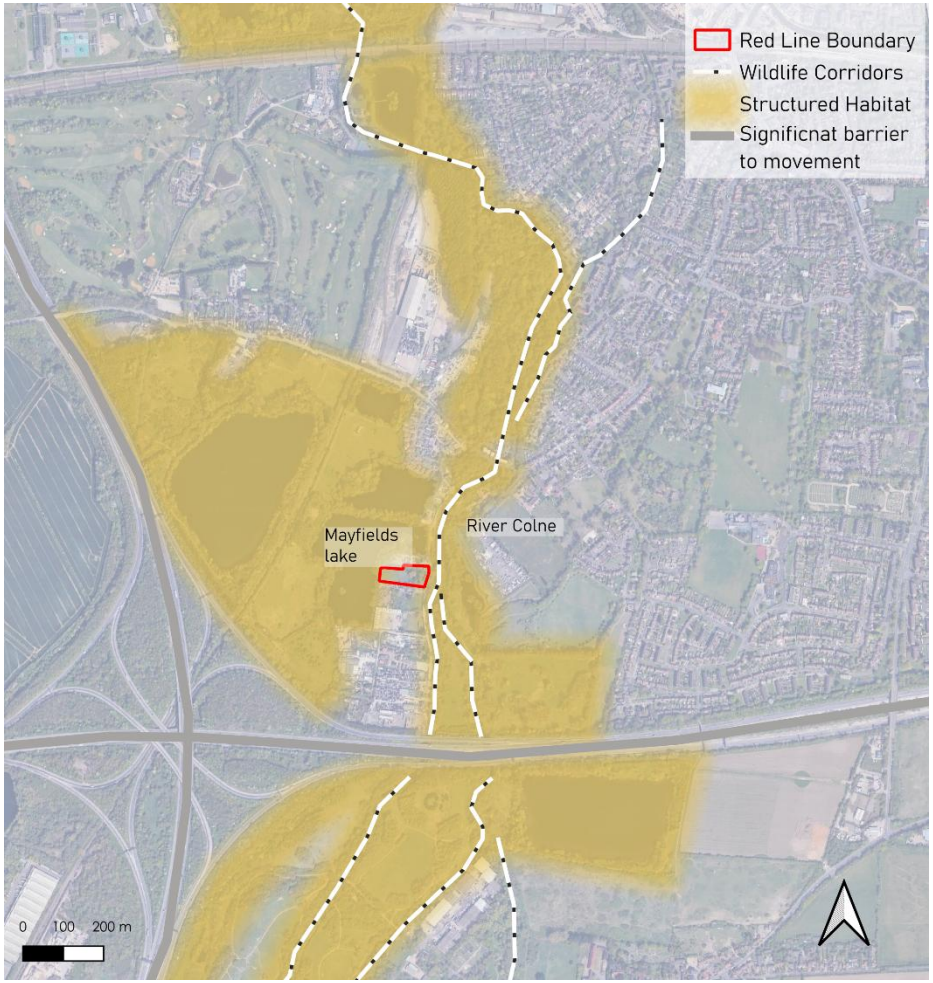
## Landscape

8. The Site lies to the south west of West Drayton, a suburb of Greater London. It is bound to the north and south by similar sites which have seen recent clearance of habitats for commercial use. Development of West Drayton increases in density to the north east, beyond the River Colne, which flows north to south immediately east of the road which marks the Sites eastern boundary. Mayfields Lake is found beyond a narrow strip of woodland west of the Site.
9. The Site occupies a location within a pocket of semi natural habitat including woodland, lakes, the river and golf courses, which provide higher ecological value, though this is all bound by a major motorway junction between the M25 and M4 to the west and south respectively and West Drayton to the north and east.
10. The Site overlies the London Clay Formation with superficial alluvium deposits of clay, silt, sand and gravel. This is likely to give rise to relatively neutral ground conditions, with potential for local water logging.

## Wildlife Corridors

11. The River Colne c.6m east of the Site provides an obvious corridor through the area. The riparian zone of the river provides good habitat and links a number of areas of small woodland and lakes to the north. It is however truncated by the M4 c.400m south.

**Figure 2** Analysis of wildlife corridors and structured habitat visible on mapping in relation to the Site.



# Designations

12. The assessment uses a 2km area of search around the Site for records of protected and notable species and locally or nationally designated wildlife sites.

### Statutory Designations

13. A search has been made to identify any nationally designated sites within a 2km radius of the Site, or internationally designated sites within a 10km radius. The results are shown in the below table.

**Table 1** Statutory Designated Sites.

| Site Name | Distance from Site | Designation | Summary Interest |
|---|---|---|---|
| South West London Waterbodies | 3.7km south west | Special Protection Area (SPA)<br>Ramsar | Qualifying species being gadwall and shovler |
| Windsor Forest and Great Park | 8.9km south west | Special Area of Conservation (SAC) | Primary reasons for selection being old acidophilous beech forests and violet click beetle. |

14. The Site is separated from both designated areas by a significant expanse of land and the M4 / M25 barriers. The site does not provide supporting habitat to any of the qualifying interests. Direct and indirect impacts on Windsor Forest and Great Park are considered highly unlikely and not considered further.

15. Despite the separation and lack of supporting habitat, the South West London Waterbodies SPA and Ramsar is likely to share tangible hydrological links with the Site given its proximity to the River Colne, while Mayfields lake adjacent to the site to the west may provide supporting habitat to the qualifying interests of the SPA / Ramsar.

### SSSI Impact Risk Zones (IRZs)

16. The Site lies within the 5km IRZ for the Wraysbury Reservoir SSSI but does not fall into any of the highlighted categories which require the LPA to consult with Natural England in relation to potential impacts.

### Non-Statutory Designations

17. There are 6 locally designated sites within the search radius, these are listed as Sites of Importance for Nature Conservation (SINC).

18. The Site is bound on 3 sides by the River Colne SINC. This SINC covers the river system, connecting gravel pits and areas of wet woodland and supporting a notable range of wetland plants and animals. It will be essential to ensure that operation of the Site does not lead to impacts, most likely through pollution events, which would impact this SINC. The River Colne flows north to south past the site meaning the Lower Colne SINC is well hydrologically linked to the site but would be covered by the same protections as outlined above.

19. Direct and indirect impacts on all remaining sites as a result of this development are unlikely due to the Site's separation and distance.

### Nature Improvement Area

20. The Site is not within any Nature Improvement Area.

### Wildlife Habitat Network

21. The Site is not within any mapped Wildlife Habitat Network.

### Granted EPSM Licences

22. There are no granted European Protected Species Mitigation (EPSM) licences shown within 1km of the Site.

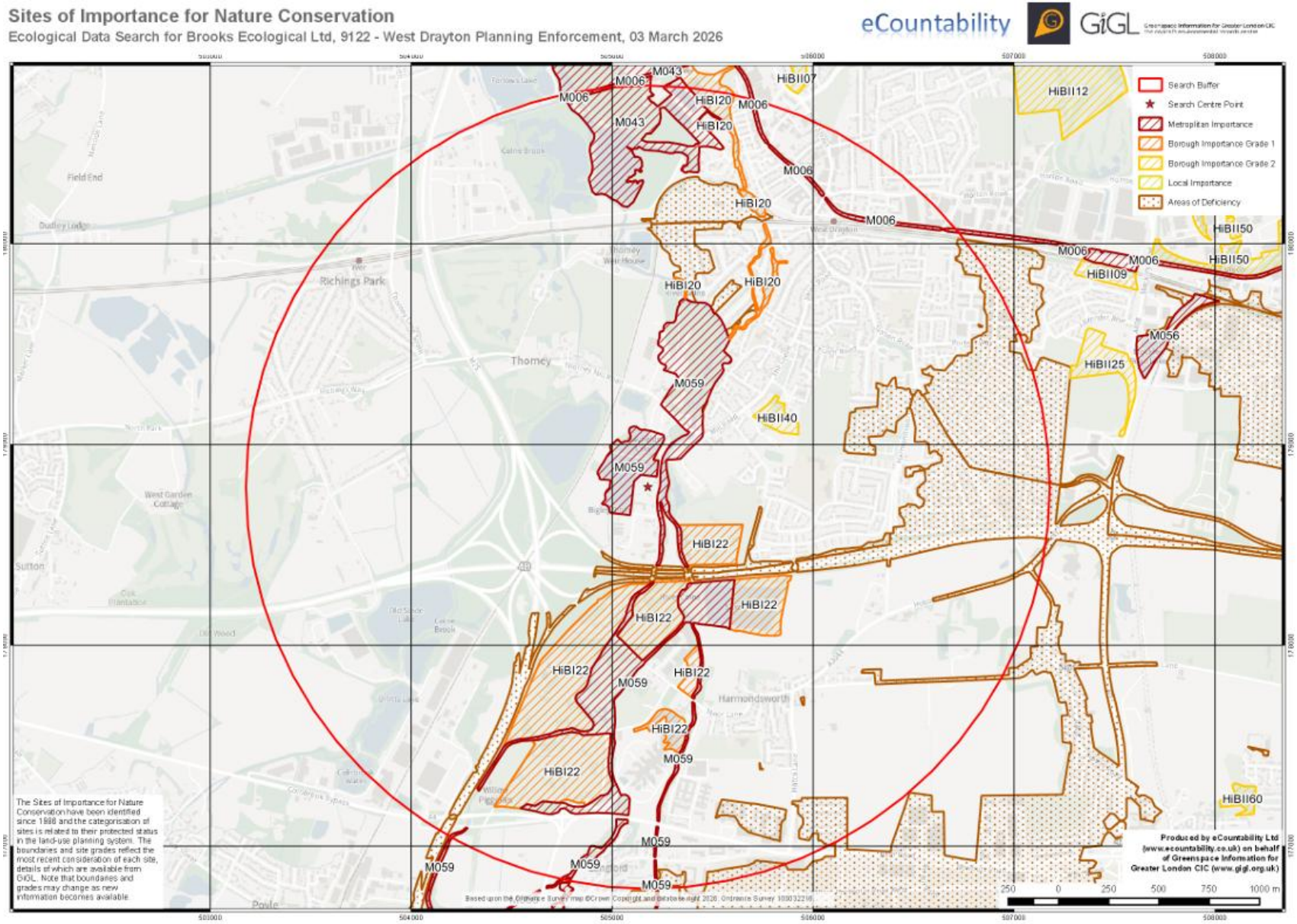
### Mapped Ancient Woodland and Trees

23. There is no mapped ancient woodland (AW) or Plantation on an Ancient Woodland Site (PAWS) within 15m of The Site, or in influencing distance. Records of Ancient Trees have not been returned.

### Mapped Priority Habitat

24. There is no mapped Priority Habitat on site. Land to the east of the road which marks the sites eastern boundary is mapped as priority deciduous woodland. The mapped area for this habitat is less than 10m from the site boundary, though in reality, due to the presence of the river, the nearest actual woodland within this block is c.50m from the site, separated by the road and river.

**Figure 3** Records of designated sites and notable species within 2km of the Site; Greenspace Information for Greater London.



# Survey

25. The survey was carried out during February 2026[1] and followed the principles of Extended Phase 1 Habitat Survey methodology (JNCC, 2010).

26. The obvious limitation relates to the fact that the site has been cleared. As such, two baselines will be presented here in. One reflecting what is currently found on site, and one as an interpretation of aerial imagery.

27. Enough time was afforded the surveyor to carry out the survey. The survey was not constrained by poor weather.

28. Whilst the majority of the Site was accessible, c.20% was within a locked compound at the time of survey to which access was not possible. This was viewed through gaps in the fence which allowed clear assessment that it reflected a continuation of habitat as seen outside the fence though this could still have concealed invasive species or protected species evidence.

# Habitat Appraisal

29. The Site's habitats are described in order on the following pages. In line with the requirement to provide information on Biodiversity Net Gain (BNG), habitats are named in accordance with the UK Habitats classification system. We have used the UK Habitats v2.01 guidance in identifying habitats. Habitat descriptions are divided into the 'distinctiveness' categories used in the calculations presented in the Biodiversity Gain Assessment, with more weight being afforded the more distinctive/important habitats.

30. Generally, the following apply to each tier of distinctiveness, although some authorities might highlight some lower distinctiveness habitats as having a higher importance locally. Where relevant we have highlighted these.

Very Low Distinctiveness Habitats

31. Habitats of little or no habitat value, i.e., lacking any significant native vegetation, but could still provide supporting habitat for protected or notable fauna such as birds or bats. In the context of BNG, their areas are included in calculations, but mitigation or compensation is not required.

Low Distinctiveness Habitats

32. Habitats which are ubiquitous, often which have been created or modified intentionally. They tend to lack diversity of species and structure. They are unlikely to support notable flora but could still provide supporting habitat for protected or notable fauna. In the context of BNG, they are included in calculations, but compensation/mitigation needs only to provide habitat of similar or higher distinctiveness.

Medium Distinctiveness Habitats

33. Habitats which are common but provide a higher level of structural and species diversity. Though unlikely to support more notable assemblages, species of interest could be present here and they are more likely to be important supporting habitat to fauna. In the context of BNG, mitigation needs to provide habitat of the same broad habitat type, or that of higher distinctiveness.

High Distinctiveness Habitats

34. Habitats which are more natural and contain more important assemblages of plants and potentially species which are rare in their own right. They will provide good habitat for fauna. These habitats are likely to be targeted as conservation priorities and will be the subject of additional policy guidance or legislation. In the context of BNG, whilst mitigation or compensation for loss or damage is possible, provision of more of the same type of habitat would be required, which (with a few exceptions) is likely to be difficult.

Very High Distinctiveness Habitats

35. These are the UK's rarest/best habitats. They will be present in very particular locations and a range of rare or important plant and animal species will depend on the particular conditions they provide. These habitats will be the subject of restrictive policy guidance or legislation. Whilst the BNG metric does not preclude mitigation or compensation in respect of these habitats, creation of the same habitat type would be required, and this would range between very difficult/expensive and impossible.

Irreplaceable Habitats

36. These are habitats of high biodiversity value, which are so difficult to recreate that it would be impossible to achieve the requirement to increase biodiversity on top of no net loss. These habitats have significant protection in the NPPF; any impacts from development require a strong justification and will flag as unacceptable in the Biodiversity Metric. Bespoke compensation for any loss of these habitats must be agreed with the LPA.

37. Each habitat is mapped and an area for each type is provided in the format of the Statutory Biodiversity Metric Calculation Tool. The areas can be used to quantify the impacts of development in an Ecological Impact Assessment if this is required by the Local Planning Authority.

[1] This Report has been prepared during March 2026 following a visit to the Site in February 2026, and our findings are based on the conditions of the Site that were reasonably visible and accessible at that date. We accept no liability for any areas that were not reasonably visible or accessible, nor for any subsequent alteration, variation, or deviation from the Site conditions which affect the conclusions set out in this report.

# Current baseline

**Figure 4** Approximate location and extent of these habitats.

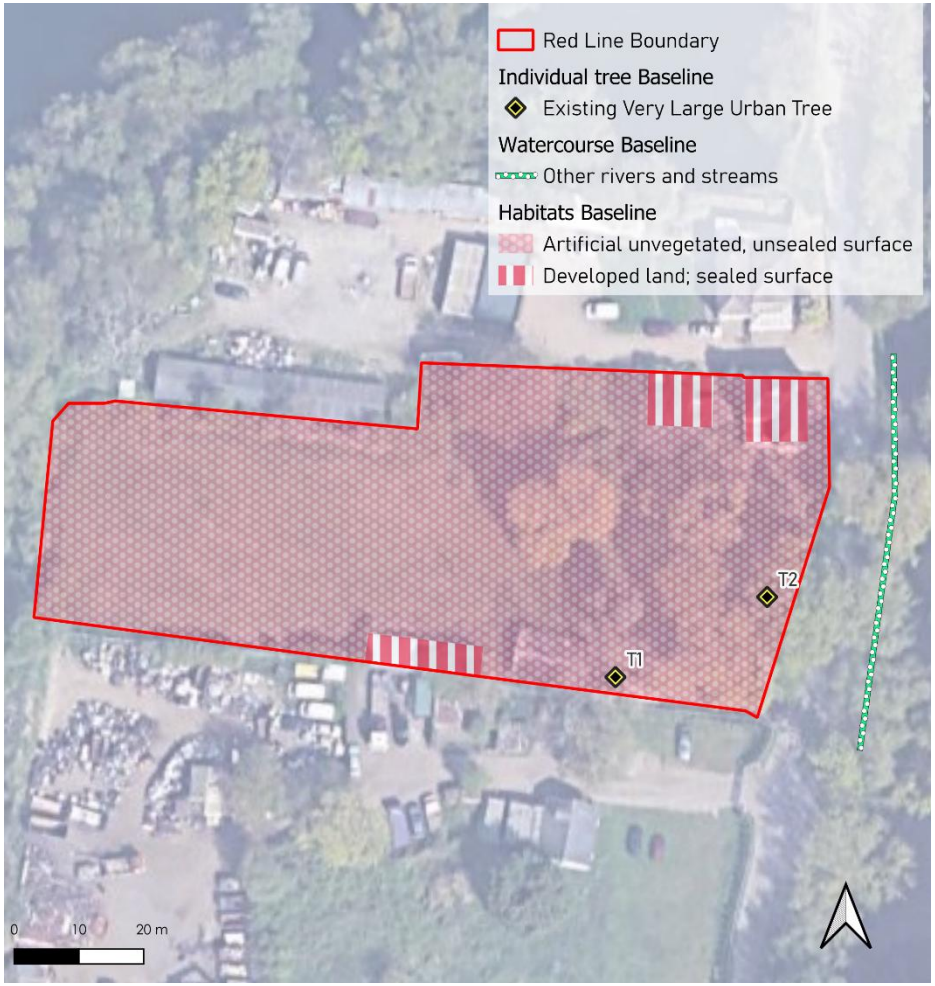



**Table 2** Summary – Habitats of Low/Very Low Distinctiveness.

| UK Habitats | Label Ref | Summary Description |
|---|---|---|
| Artificial unvegetated; unsealed surface | N/A | The vast majority of the site area is now occupied by compacted gravel, largely devoid of vegetation. Very occasional dandelion, nettle, herb Robert, bramble, chickweed, stonecrop and meadow grass was noted around the margins. |
| Developed land; sealed surface | N/A | Including a former residential property, large metal storage shed, and old stables type building on the southern boundary. No significant vegetation. |
| Individual trees | T1<br>T2 | Two "very large" trees remain on site. T1 is a standing monolith c.3m tall of indeterminate species due to it having been partially felled while T2 is a fine example of a mature oak. |
| Other Rivers and Streams | N/A | Although offsite, the crest of the banks of the River Colne are found within 10m of the Site boundary and as such, it is included within the baseline. |

# Current baseline habitats

**Figure 5** Artificial unvegetated; unsealed surface, typical of the vast majority of the site.


**Figure 6** Stable type building mapped as developed land.

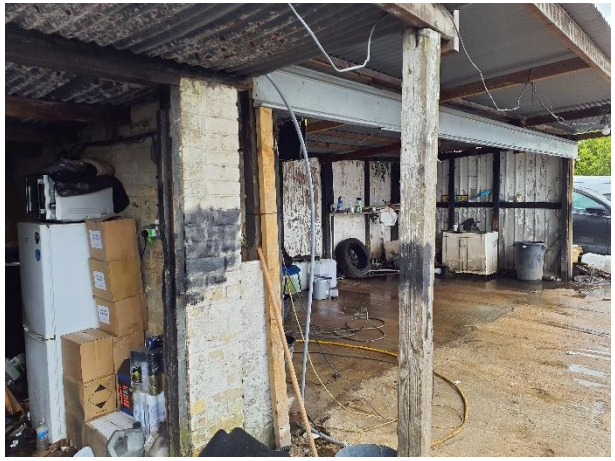


**Figure 7** Standing monolith (T1) on site's southern boundary mapped as very large tree.

**Figure 8** Very large oak (T2) within locked part of site on site's eastern boundary

# Preclearance assumed baseline

**Figure 9** Approximate location and extent of these habitats.

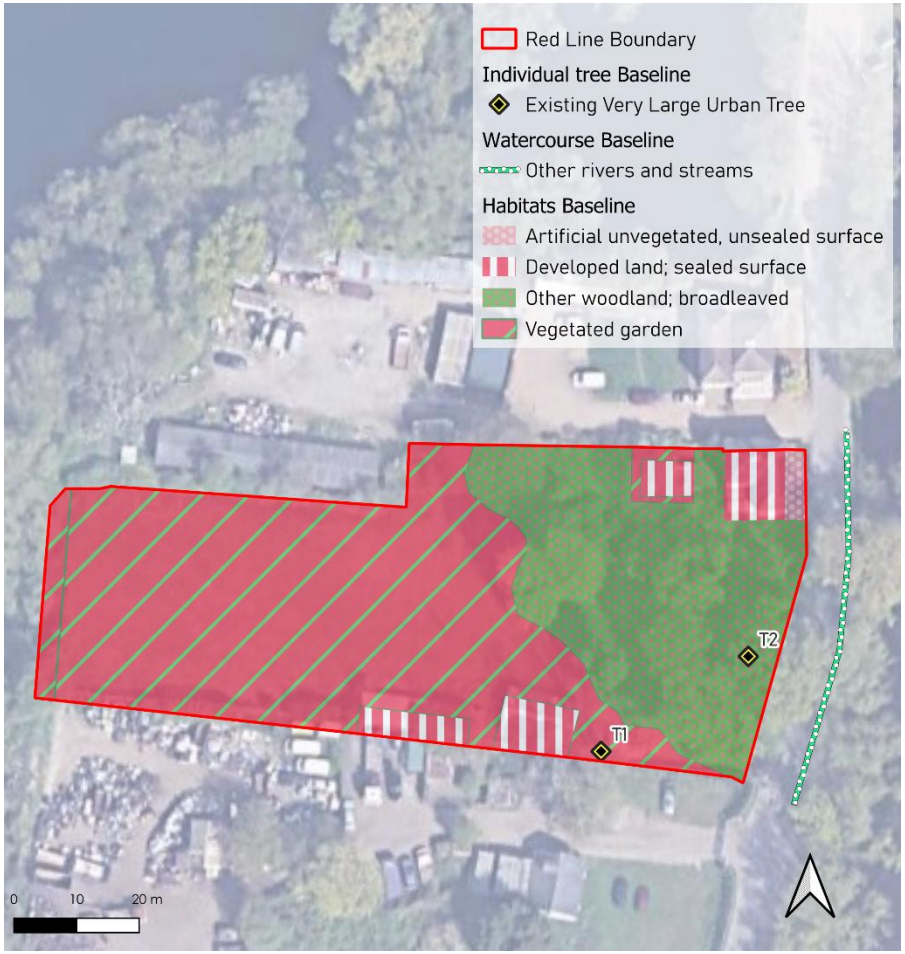



**Table 3** Summary assumed preclearance habitats.

| UK Habitats | Summary Description |
|---|---|
| Other woodland; broadleaved | Assumed woodland based on aerial imagery. |
| Vegetated garden | Grassland within the confines of private curtilage of residential property. |
| Developed land, sealed surface | Include the house, and garages and sheds visible on mapping. |
| Artificial unvegetated, unsealed surface | Small area of gravel to house frontage. |
| Individual trees | Two trees which remain present on site have been mapped independently to correspond with the current baseline. |
| Other rivers and stream | Although offsite, the crest of the banks of the River Colne are found within 10m of the Site boundary and as such, it is included within the baseline. |

## Ancient or veteran trees

38. Ancient or veteran trees have not been identified on site. However, the two remaining specimens are clearly mature, and are likely to provide a number of features of ecological value and as such would be assessed as transitional veterans.

39. Loss of veteran trees is now precluded in the NPPF, and they are treated as 'irreplaceable habitat' under the BNG system. These trees should, in the absence of further detail, be considered as an absolute constraint to development. If their removal or pruning works are pivotal to plans for the Site, further investigation will be required into their veteran status, and potential for agreeing specific compensation for their loss with the LPA.

# Faunal Appraisal

40. The following pages discuss only the groups and species that could be reasonably expected to be found on the type of habitats present on, or adjacent to, the Site.

## Amphibians

### *Desk evidence*

41. Three very large standing water bodies are present within 250m of the site.
42. There are 8 records of great crested newt within the search radius, the closest being c.750m NE from the site. The distance and separation by the River Colne mean individuals from this population would not be expected to occur within the site.
43. Common frog is also recorded within the search radius.

### *Field Evidence*

44. There is no suitable amphibian breeding habitat on site, nor does there appear to be on aerial imagery pre-clearance.
45. The three waterbodies within 250m are all very large (over 0.5ha) and as such would be considered suboptimal to support breeding GCN given the likely presence of fish.
46. Terrestrial habitat is very limited on site, though prior to clearance the site would have offered some value.

### *Summary Evaluation*

47. Unlikely to be important to amphibian populations, particularly GCN given the absence of suitable habitat on site, sub-optimal nature of surrounding water bodies for breeding and disconnect to known records.

### *Further Surveys and Recommendations*

48. No further surveys or precautions are considered necessary.

**Figure 10** Ponds mapped in relation to the Site.

# Bats

### *Desk evidence*

49. Species recorded include common, soprano and Nathusisus' pipistrelle, daubentons, noctule, Leisler's and brown long eared, alongside a number of indeterminate species records.

50. The closest records relate to common and soprano pipistrelle, brown long eared and Daubenton's, all recorded c.450m SE in 2019.

### *Field Evidence (Roosting)*

51. The site includes three structures comprising the residential house, an old stables type building and a large metal shed, alongside a number of portacabins.

52. Two trees remain on site, one being a standing monolith and without any suitable roost features. The large mature oak could not be closely inspected due to being within a locked area of the site. However, given its size and age, at least some level of roost suitability should be assumed.

**Table 4** Bat Roost Suitability Assessment.

| Ref | Notes | Suitability |
|---|---|---|
| House | Cavity brick construction, hipped concrete tile roof. Very minor gap between soffit board and wall – not considered sufficient to permit bats access. | Negligible |
| Stable | Open fronted, rudimentary construction style | Negligible |
| Metal shed | Metal post and frame shed | None |
| Portacabins | Standard, simple construction | None |
| T2 | Large mature tree, at least some features assumed | PRF-I |

### *Field Evidence (foraging and commuting)*

53. In its current state the site present negligible value for commuting or foraging value.

54. However, it is surrounded by areas of higher value, including the river, lakes and riparian woodland. Prior to clearance, the site would have contributed to resources used by local bat populations, but they would not have had any dependence on it.

### *Summary Evaluation*

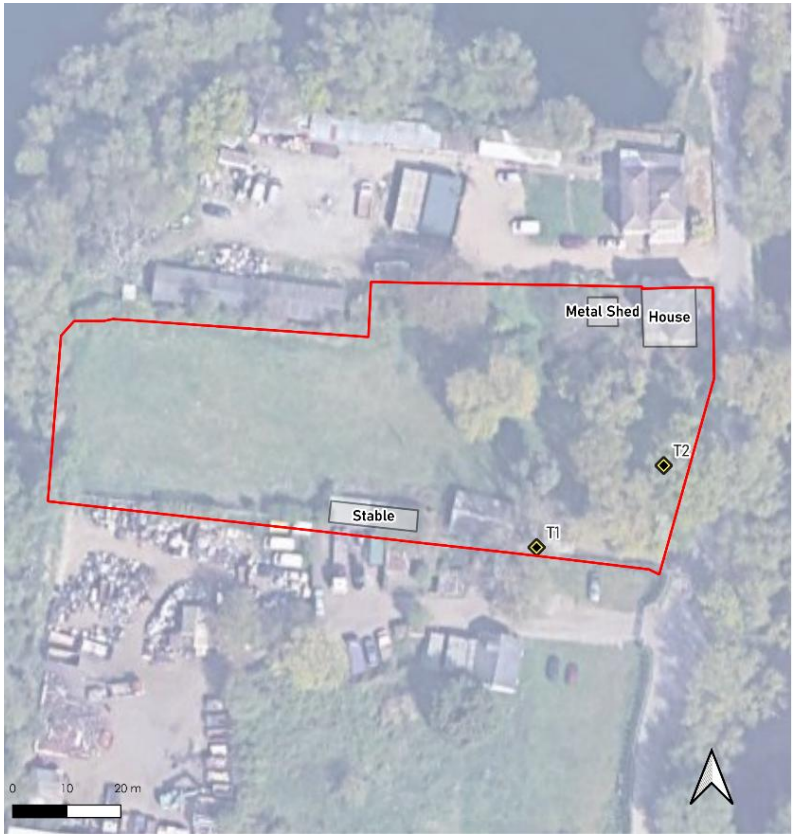
55. In its current condition, the site provides minimal value to local bat populations though it is surrounded by habitat likely to be used for both foraging and commuting.

### *Further Surveys and Recommendations*

56. Should there be any impact to T2 further survey would be required, though there is no reason any further work to vegetation should be undertaken on site.

57. While further survey is not required, effort should be made to ensure impacts on surrounding habitat is not felt, including ensuring light spill is not felt on surrounding habitat.

**Figure 11** Building plan.



# Bat Roost Suitability Assessment

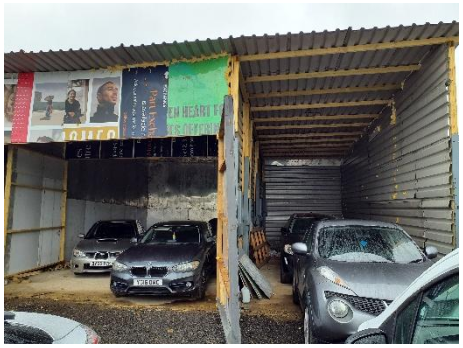
General view of house

General view of roof structure

Very minor crevice at soffit board

Porch structure to frontage

Metal shed



Stable building

## Birds

### *Desk Evidence*

58. A large number of bird records have been returned. The vast majority relate to aquatic and wading birds associated with the surround lakes.

59. Records include a significant number of species listed on Schedule 1 of the Wildlife and Countryside Act, though again, these primarily relate to birds which are present in the area and would find little value in habitat on site, in its current cleared state, or previously when it was occupied by woodland and garden vegetation.

### *Field Evidence*

60. In its current state the site offers negligible value to any bird species, for any activity.

61. Previously, it would have supported a number of nesting territories of relatively ubiquitous species associated with the woodland, while also offering some minor foraging potential.

### *Summary Evaluation*

62. Previous value would be limited to foraging and nesting by common bird species. In its current guise the site offers little value to any bird species.

### *Further Surveys and Recommendations*

63. No further surveys are considered necessary to demonstrate current baseline in respect of birds.

## Badgers

### *Desk evidence*

64. There are two records of badgers in the area though the most recent was recorded in 2004.

### *Field Evidence*

65. The Site provides no potential habitat which would support badgers.

66. Prior to clearance the site would have offered some foraging value, and potential sett building habitat, though it is difficult to envisage it being utilised given its use as a private garden and the surrounding land uses to the north and south.

### *Summary Evaluation*

67. Badger setts are unlikely to be present at the Site as affected by the proposals.

### *Further Surveys and Recommendations*

68. Further survey is not considered necessary in support of this conclusion.

## Hedgehogs (NERC Act 2006/Local BAP)

### *Desk evidence*

69. Hedgehogs are recorded within the search area.

### *Field Evidence*

70. No evidence of hedgehogs was found on site. In its current state it will offer little value to hedgehog given the complete lack of cover.

### *Summary Evaluation*

71. The Site would have provided suitable habitat for this species. In its current condition it is unlikely that the site hosts anything more than incidental occurrence of hedgehog within the site.

### *Further Surveys and Recommendations*

72. Further surveys are not considered necessary however measures return some cover planting to the site and allow them continued access should be planned for.

## Riparian Mammals

### *Desk evidence*

73. Water vole are recorded in the area.

### Field Evidence

74. The site provides no suitable habitat for any riparian mammal.

75. Although in proximity to the River Colne, c.8m east and Mayfield Lake, 7m west, given the presence of the road between the site and the river and the complete close boarded high fence surrounding the site it is considered unlikely that any riparian species would make use of this habitat or be influenced by its use.

### *Summary Evaluation*

76. The likely absence of water vole and otter from the Site can be concluded.

### *Further Surveys and Recommendations*

77. Further survey is not recommended in support of this conclusion.

## Reptiles

### *Desk evidence*

78. Slow worm and grass snake are both recorded in the wider area, though none more recently than 2015.

### *Field Evidence*

79. The Site provides no suitable habitat for these species. However, in its previous guise, there would have been suitable cover habitat to allow the site to provide functional supporting habitat to any populations in the wider area.

### *Summary Evaluation*

80. Currently offers no suitable habitat, though prior to clearance may have contributed to that used by local populations.

81. Despite this, the loss of this small area of woodland and garden would not be expected to negatively impact the favourable conservation status of slow worm or grass snake in the wider area.

### *Further Surveys and Recommendations*

82. No further surveys or precautions are considered necessary.

## Invasive Non-Native Species (INNS)

83. INNS are species listed on Schedule 9 of the Wildlife and Countryside Act (1981), for which it is an offence to cause or allow it to grow in the wild.

84. No INNS were noted during survey[2].

*Survey constraints*

85. Although no INNS have been identified in this preliminary survey, it is not always possible to conclude absence from preliminary survey alone due to factors such as season, accessibility, third-party attempts to hide evidence, or undisclosed treatment programmes. For this reason, this report should not be relied upon as definitive evidence of absence of INNS.

86. This site presents a significant risk of supporting undetected INNS based on the following factors:

- Areas of site inaccessible to survey
- Potential for recent earthworks or management which may have obscured viable material
- Proximity to nearby potential sources of infection

87. Should further assurances be needed in relations to INNS, a dedicated Invasive Weed Survey should be commissioned.

[2] Whilst our ecologists are trained in the identification of invasive species, this report is not a dedicated invasive species survey. Detectability of invasive plant species can be affected by several factors, and conclusive determination status, or extent, is not possible through preliminary survey alone. As the presence of invasive species can generate significant costs to development, the client may wish to instruct a dedicated invasive species survey prior to entering into contracts.

# Ecological Constraints

### *Habitat Value*

88. The usual approach to development would be to minimise any net loss of biodiversity towards a gain in biodiversity value where this is possible on-Site. In this case, the site has already been subject to relatively wholesale clearance. As such, on-site habitat constraints are absent with the exception of the two retained trees which must be protected.

89. Our separate report on Biodiversity Gain sets out the position of the Site in terms of measured biodiversity.

90. The remaining habitat constraint relates to any commercial operation at the site ensuring and absence of impact on surrounding higher value habitat and that further afield. Operations at the site must ensure protection of the adjacent River Colne and Mayfield Lake to protect their biodiversity interests. Furthermore, there are hydrological links to South West London Waterbodies SPA and Ramsar and supporting habitat adjacent.

91. Given "development" has already taken place, the above measures should be set out in a Biodiversity Enhancement and Management Plan, which can be produced as a standard condition of planning.

### *Faunal constraints*

92. Value to any faunal groups has largely been lost from the site, though there remains a risk of impacting notable offsite habitat which is likely to be used by a range of protected and notable species.

93. Further species specific survey is not considered necessary and would not serve any valuable purpose given the habitat clearance, measures to protect what remains on and surrounding the site should be set out in a Biodiversity Enhancement and Management Plan, which can be produced as a standard condition of planning.

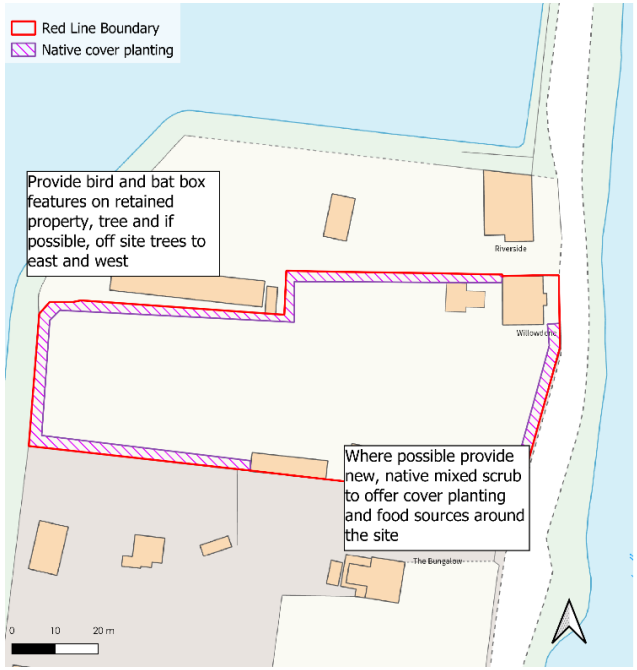
# Ecological Opportunities

94. There is little scope to provide any ecological enhancement but efforts should be focused on redressing some of what has been lost here.

- Provision of bands of native scrub or tree planting around the site will provide cover and food sources for local wildlife as well as help to facilitate movement through and around what would otherwise be a barren site.
- Provision of bird and bat boxes will redress some of the value lost during the removal of woodland, though the uptake of such features within the site may be prejudiced by its absence of cover vegetation and activity associated with its commercial use. To this end, features should be installed on the elevation of the house facing a way from the site, high in the remaining tree or potentially on mature trees off site to the east and west.

95. A Biodiversity Management Plan would be useful in defining these enhancements and can be secured by standard condition.

**Figure 12** Ecological Opportunities.



# Conclusions and Recommendations

| Planning considerations | | |
|---|---|---|
| **Recommendation** | **Rationale** | **When** |
| **R1** Additional Surveys | | |
| **R1.1** Vegetation | Not required | N/A |
| **R1.2** Fauna | Not required | N/A |
| **R2** Biodiversity Net Gain (BNG) | Carry out a BNG Assessment using the Statutory Biodiversity Metric Calculation Tool and accompanying Condition sheets produced by Defra.<br>In this case, the site has already been cleared and as such, the BNG assessment would need to be based on assumptions made from aerial imagery, the desk study information and previous use of the site.<br>Prior to development commencing, a Habitat Management and Monitoring Plan (HMMP) and Biodiversity Gain Plan (BGP) will likely be requested by the LPA. | To inform planning |
| **R3** Ecological Impact Assessment (EcIA) | Given the work has taken place there would be little value in providing an Ecological Impact Assessment, though it may be requested by the LPA. | N/A |
| **R4** Produce a Biodiversity Management Plan | To specify in detail how the development will cater for biodiversity on-Site and to show how surrounding habitats will be protected. | Delivery report<br>Suitable for planning condition |

# References


**Guidelines and Best Practice**

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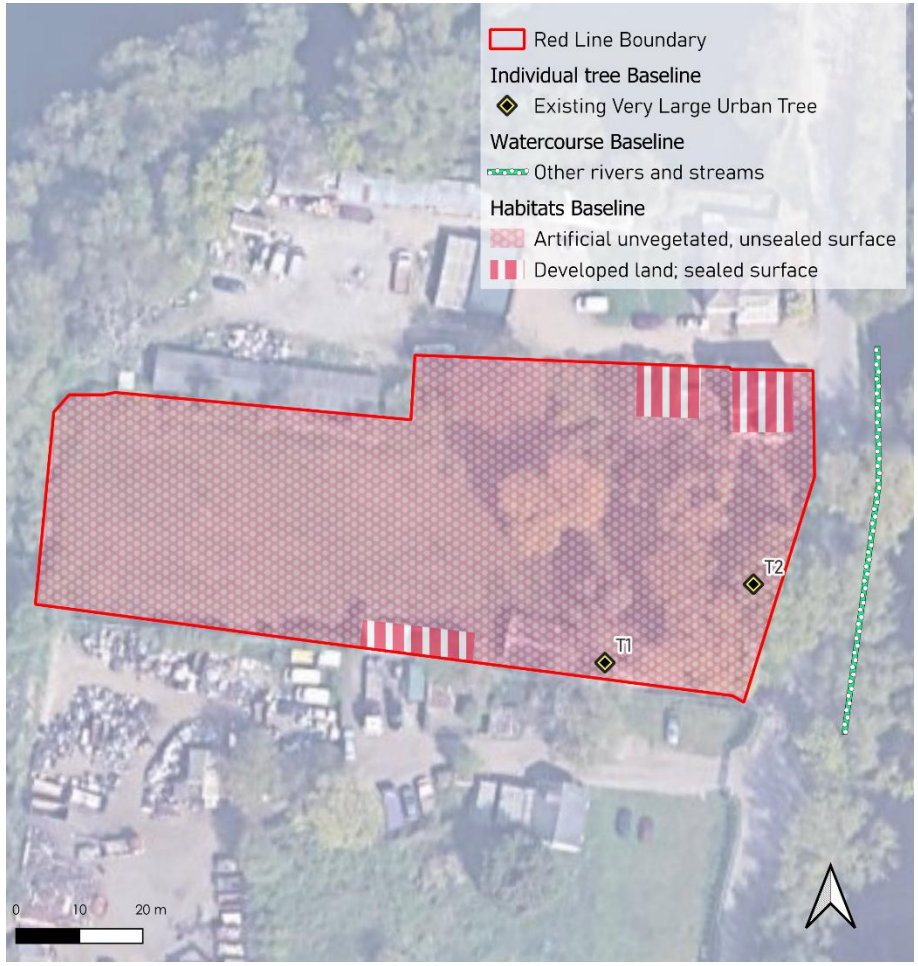
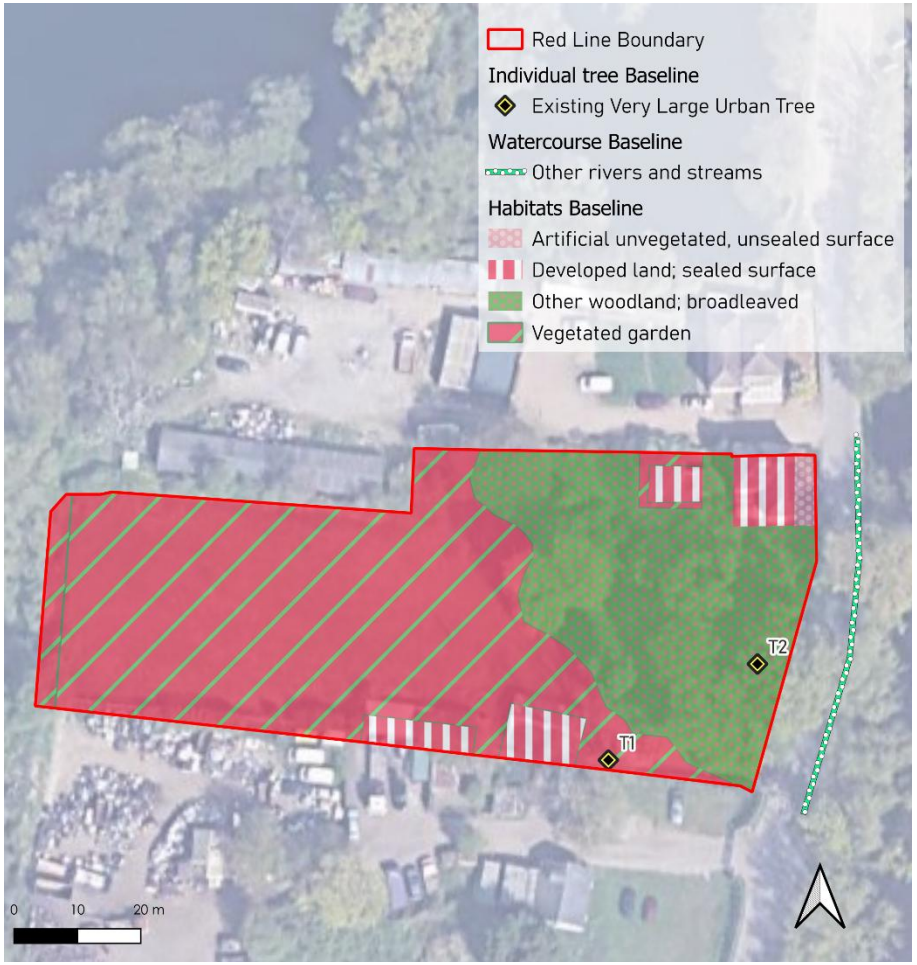
# Appendix 1 Habitats and Ecological Features

Current baseline




Pre-clearance baseline



# Appendix 2 List of species recorded

| | |
|---|---|
| Bramble | *Rubus fruticosus* |
| Chickweed | *Stellaria media* |
| Dandelion | *Taraxacum officinale agg.* |
| Herb robert | *Geranium robertianum* |
| Meadow grass | *Poa sp.* |
| Nettle | *Urtica dioica* |
| Oak | *Quercus sp.* |
| Stonecrop | *Sedum sp.* |

# Appendix 3 Explanatory Notes and Resources Used

Site Context

Aerial photographs published on commonly used websites were studied to place the site in its wider context and to look for ecological features that would not be evident on the ground during the walkover survey. This approach can be very useful in determining if a site is potentially a key part of a wider wildlife corridor or an important node of habitat in an otherwise ecologically poor landscape. It can also identify potentially important faunal habitat (in particular ponds) which could have a bearing on the ecology of the application site. Ponds may sometimes not be apparent on aerial photographs so we also refer to close detailed maps that identify all ponds issues and drains.

Designated Sites

A search of the MAGIC (Multi-Agency Geographic Information for the Countryside) website was undertaken. The MAGIC site is a Geographical Information System that contains all statutory (e.g. Sites of Special Scientific Interest [SSSIs]) as well as many non-statutory listed habitats (e.g. ancient woodlands and grassland inventory sites). It is a valuable tool when considering the relationship of a potential development site with nearby important habitats. In addition, information from the local record holders was referred to on locally designated sites.

Functional linkage with off-Site habitats

When assessing these we consider whether the Site could be functionally linked to them, considering links such as:

- Hydrological links – is the Site upstream downstream, or could ground water issues affect it?
- Physical links – is the site in close proximity and could it be directly or indirectly affected by construction and operational effects? Conversely it may be that despite proximity major barriers separate the two.
- Recreational links – do footpaths and roads make it likely that increased recreational pressure could be felt?
- Habitat links – is the site part of a network of similar habitat types in the wider area? These could be joined by linear corridors or could simply be 'stepping stones' of habitat of similar form or function.

Method

Phase 1 habitat survey methodology (JNCC, 2010). This involves walking the site, mapping and describing different habitats (for example: woodland, grassland, scrub). The survey method was "Extended" in that evidence of fauna and faunal habitat was also recorded (for example droppings, tracks or specialist habitat such as ponds for breeding amphibians). This modified approach to the Phase 1 survey is in accordance with the approach recommended by the Guidelines for Baseline Ecological Assessment (IEA, 1995) and Guidelines for Preliminary Ecological Appraisal (CIEEM 2017).

Faunal Appraisal

This section first looks at the types of habitat found on Site or within the sphere of influence of potential development, then considers whether these could support protected, scarce, or NERC Act 2006 Section 41 species (referred to collectively as 'notable species').

Records of notable species supplied from a 2km area of search by greenspace Information for Greater London are used to inform this appraisal.

We discuss further only notable species or groups which could be a potential constraint due to the presence of suitable habitat and their presence (or potential presence) in the wider area. We screen out and do not present accounts of notable species or groups which do not meet these criteria – in some cases it may be necessary to explain this reasoning.

Consideration is given to the Local Biodiversity Action Plan (LBAP), in this case there is not LBAP for Hillingdon; the site is instead covered by the broader London Biodiversity Action Plan.

Bats

Bat roosting potential is classified according to the following criteria set out below, taken from the Bat Conservation Trust Good Practice Guidelines (2023).

**Bat Roosting Suitability of Buildings**

| Suitability | Criteria |
|---|---|
| *None* | No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels). |
| *Negligible* | No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion. |
| *Low* | 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 larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats). |
| *Moderate* | 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 (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed). |
| *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 due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site. |

**Bat Roosting Suitability of Trees**

| Suitability | Criteria |
|---|---|
| *None* | Either no PRFs in the tree, or highly unlikely to be any. |
| *FAR* | Further assessment required to establish if PRFs are present within the tree. |
| *PRF-I* | Potential roost feature suitable to support individual or low numbers of bats |
| *PRF-M* | Potential roost feature suitable to support multiple bats and possibly be used by a maternity colony |

Evaluation

In evaluating the Site, the ecologist will take into account a number of factors in combination, such as:

- the baseline presented above,
- the Site's position in the local landscape,
- its current management and
- its size, rarity or threats to its integrity.

There are a number of tools available to aid this consideration, including established frameworks such as Ratcliffe Criteria or concepts such as Favourable Conservation Status. Also of help is reference to Biodiversity Action Plans in the form of the Local BAP and Section 41 of the NERC Act (2006) to determine if the Site supports any Priority habitats or presents any opportunities in this respect.

The assessment of impacts considers the generic development proposals from which potential effects include:

- Vegetation and habitat removal
- Direct effects on significant faunal groups or protected species
- Effects on adjacent habitats or species such as disturbance, pollution and severance
- Operation effects on wildlife such as noise and light disturbance

# Appendix 4 Bat Activity Survey Rationale

The Bat Conservation Trust Guidelines (BCTG) (Collins 2023) is now widely accepted as providing a basis and rationale for scoping and conducting bat surveys. It is acknowledged that the guidelines provide a wealth of background and are a very useful tool in standardising approaches to survey, it is also felt that an over reliance on some of the guidelines within this document can result in the provision of complicated surveys where they have significant consequences for the cost, or timescale of a large project, but could never deliver positives for bat conservation.

Taking the BCTG document as a whole, Chapter 2 helps the reader understand whether or not surveys are required, and that in the context of planning and development survey is required in relation to ensure;

- the avoidance of legal offences, and;
- the provision of a sufficient level of information – such that will allow the Local Planning Authority to make an informed decision on the proposals and their potential impacts on the Favourable Conservation Status (FCS) of bats.

Attendance at seminars presented by, and discussions with, those involved in production of the BCTG document has emphasised the point that it is within the remit of the consultant ecologist to make a decision on the necessity and scope of surveys – they will use the guidelines in doing so but are not in any way bound by them: this is reflected in Section 1.1 of the guidelines –

'The Guidelines do not aim to either override of replace knowledge and experience. It is accepted that departures from the guidelines (e.g. either decreasing or increasing the number of surveys carried out or using alternative methods) are often appropriate. However, in this scenario an ecologist should provide documentary evidence of (a) their expertise in making this judgement and (b) the ecological rationale behind the judgement. '

Such decisions require a consideration of the potential of the project to impact on bat habitat, alongside analysis of the value of habitat on and around the site and of local records and the likelihood that bats might occur in significant numbers. Our reports aim to present information on how we have arrived at our decision on the Site, what assumptions we have based this on, and where further survey is recommended we indicate what the objective of this survey should be and how best this would be achieved.

While the site would have previously offered some value to local bat populations, following the removal of vegetation it contributes little to bat resources and survey would be disproportionate to information which would be gather, or the impact of the site to bats.

This assessment was made by Sam Kitching BSc (Hons) MCIEEM. Sam has 15 years experience undertaking bat surveys in a professional capacity and is registered to use the Bat Survey Class Licence (level 2).

# Appendix 5 Wildlife Legislation, Policy and Guidance

This is not an exhaustive list but sets out briefly the relevance of Legislation, Policy and Guidance in terms of planning applications and this assessment.

**Legislation**

Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (EC Habitats Directive).

Provides framework at an international (EU) level for the consideration/protection of European Protected Species (EPS), and habitats through the designation of sites.

Council Directive 79/409/EEC on the Conservation of wild birds (EC Birds Directive) and The Ramsar Convention on Wetlands of International Importance (1971)

Provides framework at an international (EU) level for the consideration/protection of important bird populations and the sites on which they are dependant.

The Conservation of Habitats and Species Regulations (2010)

This transposes the EC Habitats Directive into UK law and provides the basis on which all EPS are protected and impacts on them can be licensed in the UK.

The Wildlife and Countryside Act (1981) as amended

This provides the basis on which UK species are legally protected or restricted and confers protection on Sites of Special Scientific Interest SSSIs. It contains annexes of plants and animals which are legally protected as well as those which are considered to be invasive or harmful. It provides the basis on which impacts on such species can be licensed in the UK and provides controls on work on or near SSSIs.

The Countryside and Rights of Way Act 2000 (CRoW)

Provides a statutory basis for nature conservation, strengthens the protection of SSSIs and UK protected species and requires the consideration of habitats and species listed on the UK and Local Biodiversity Action Plans (UKBAP/LBAP).

Natural Environment and Rural Communities Act 2006 (NERC)

Sets out the responsibilities of Local Authorities in conserving biodiversity. Section 41 of the Act requires the publishing of lists of habitats and species which are "of principal importance for the purpose of conserving biodiversity". At present these largely reflect those making up the UKBAP lists.

Hedgerows Regulations (1997)

Define and provide protection for Important Hedgerows.

Protection of Badgers Act (1992)

Protects badgers from persecution, this includes excavation/development in the proximity of setts.

**Protected Sites**

Statutory EU/International Protected Sites

Special Areas of Conservation (SACs); and Special Protection Areas (SPAs) and Ramsar Sites contain examples of some of the most important natural ecosystems in Europe. Work on or near these sites is strictly protected and Local Authorities will be expected to carry out 'Appropriate Assessment' of development in proximity of them. In this case there is often an increased burden on the developer in relation to provision of information and assessment.

Statutory UK Protected Sites

Local Nature Reserves (LNRs); National Nature Reserves (NNRs); Sites of Special Scientific Interest (SSSIs) all receive strict protection under UK legislation. Work in or in proximity to these sites would be restricted with any needing to be agreed with Natural England. Natural England now provide guidance on the nature of development which could impact on SSSIs through Impact Risk Zones.

Locally Protected Sites

Local Authorities have a variety of protected wildlife sites designated at a local or regional level. These are gradually being brought under the banner of Local Wildlife Sites (LWS) but at present a plethora of different designations exist – all subject to local policy.

**Protected Species**

European Protected Species

A number of species (most relevantly bats, great crested newts [GCN], and otters) receive strict protection from killing, injury and disturbance under The Conservation of Habitats and Species Regulations (2010). Protection is also conferred on the habitats on which they rely such as roost space in the case of bats and ponds and fields etc. in the case of GCN.

UK Protected Species

A number of species (including bats, GCN, watervole and white clawed crayfish) are strictly protected under The Wildlife and Countryside Act (1981) as amended, from killing, injury, disturbance and damage or destruction of their resting places etc. Certain species (such as reptiles) and some birds (such as barn owl) receive partial protection e.g. at certain times of the year or form certain activities only. All nesting bird species are protected from damage or destruction of their nests – whilst active.

**Invasive species**

Schedule 9 of the Wildlife and Countryside Act (1981) as amended,

Lists these species and makes it an offence to cause or allow their spread in the wild. This often has impacts on development and planning in relation to the presence of invasive plant species such as: Himalayan balsam (*Impatiens glandulifera),* Japanese knotweed (*Reynoutria japonica*), and giant hogweed *(Heracleum mantegazzianum*).

**Planning Policy/Guidance**

The National Planning Policy Framework (NPPF)

The National Planning Policy Framework was updated in December 2024. The most relevant paragraphs from the NPPF are set out below.

The approach to assessing the natural environment is now embedded within the definition of what 'sustainable development' is and this falls under one of three objectives of the planning system – the 'environmental objective' applying in this case. Paragraph 8c (P8c) of the NPPF states that sustainable development should "protect and enhance our natural, built and historic environment", including "improving biodiversity". P10 sets out the Framework's presumption in favour of sustainable development.

Section 11 of the NPPF details making effective use of land. The Framework states that planning policies and decisions should take "opportunities to achieve net environmental gains – such as developments that would enable new habitat creation" and should "recognise that some undeveloped land can perform many functions, such as for wildlife" (P125).

Section 15 details conserving and enhancing the natural environment; policies and decisions should be "protecting and enhancing valued landscape [and] sites of biodiversity […] value", "recognise the intrinsic character and beauty of the countryside" and contribute to conserving and enhancing the natural environment and reducing pollution (P187). Allocations of land for development should, "allocate land with the least environmental or amenity value, where consistent with other policies in this Framework" and "take a strategic approach to maintaining and enhancing networks of habitats" (P188).

The Framework sets out ways to minimise the impacts on biodiversity through plans which "identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity" and promote the "conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity" (P192).

It is made clear in P193 that local planning authorities should apply a set of principles when determining planning applications. Planning permission should be refused "if significant harm to biodiversity resulting from development cannot be avoided […], adequately mitigated, or, as a last resort, compensated for". Development should not normally be permitted where an adverse effect on a SSSI is likely, and "opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity".

UK Biodiversity Indicators 2023; update to Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services

The UK Biodiversity Indicators 2023 provide updates to the indicators set out in Biodiversity 2020 including new species abundance targets as set out in the Environment Act 2021. Biodiversity 2020 builds on the Natural Environment White Paper (June 2011) – Setting out the current UK Government's approach to nature conservation. It promotes a more coherent and inclusive approach to conservation and the valuing in economic and social terms of economic resources.

The strategy promotes initiatives such as Biodiversity Offsetting, Nature Improvement Areas and a focus on well-connected natural networks and introduces the concept of securing a 'no net loss' situation with regard to UKBAP/Section 41 habitats and species.

ODPM circular 06/05 (2005) Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System
Provides guidance to Local Authorities on their obligations to biodiversity – particularly in relation to assessing planning applications and ensuring the adequacy of information.

BSI (2013) British Standards Institute BS 42020:2013 Biodiversity – Code of Practice for Planning and Development

Provides a standard for the biodiversity assessment and development industries and decision makers such as Local Planning Authorities to work to.