

Preliminary Ecological Appraisal

Site: 233 UXBRIDGE HIGH STREET

Ref: 451627 / SJ1

Client: FROUGH LTD



Prepared by:

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Revision	Description	Date
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EXECUTIVE SUMMARY

Gradwell Group was commissioned by Frough Ltd to undertake a Preliminary Ecological Appraisal (PEA) of 233 Uxbridge High Street, Uxbridge, UB8 1LD. Planning permission is to be sought from the London Borough of Hillingdon for full planning and listed building submission application for the proposed new hotel building adjacent to the existing building at 233 Uxbridge High Street, along with the conversion of the old cinema and then nightclub space into a banqueting hall.

The PEA was carried out in July 2025 and comprised a desk-based study and an extended Phase 1 habitat survey, following the Preliminary Ecological Appraisal Guidelines (CIEEM, 2017) and standard methodologies set out in the UK Habitat Classification User Manual (UK Habitat Classification Working Group, 2018).

The survey area encompasses approximately 0.32 hectares and includes development land; sealed surfaces, buildings and scattered (urban) trees. The site is located along Uxbridge High Street, which features a mix of shops with residential flats above. The street-facing elevation includes a prominent entrance, original to the building's former use as a cinema, with most of the structure set back from the main street. The site lies within Uxbridge, a town in West London. The wider area is predominantly urban, with a shopping centre to the west of the site, alongside office buildings and residential properties comprising both flats and terraced housing. The site has limited ecological connectivity to the surrounding landscape, with few street trees in the immediate area; however, a grassed area with several mature trees lies adjacent to the southern boundary.

Habitats on the site have the potential to support various protected and/or notable species. This report outlines essential measures to safeguard wildlife during site clearance and construction, ensuring compliance with relevant wildlife legislation and minimising ecological impacts. In addition, recommendations are provided to enhance the site's biodiversity value post-development, delivering long-term ecological benefits.

Full details of these recommendations can be found beginning on Page 18 of this report. For ease of reference, a summary of key ecological considerations and proposed measures is provided in the table below.

This report has been prepared by a suitably qualified and experienced ecologist. The results and recommendations presented reflect the professional opinion of the author, based on information supplied by the client, details of the proposed development, and the findings of the desk study and field survey work.

REPORT INFORMATION & SUMMARY OF FINDINGS

Site Address	233 Uxbridge High Street, Uxbridge, UB8 1LD
Central Grid Reference	TQ 05904 83948
Report Author	Sam James BA (Hons) MA PGDip (Ecology) <i>AIEMA</i>
Report Reviewer	KW <i>MCIEEM</i>

Ecological Feature	Further Work/Recommendations	Applicable Timescales
Bats (Roosting)	Buildings with moderate potential (i.e., Buildings B1) would require at least two presence / absence survey between May and August. These surveys should cover all potential roosting features.	Three weeks apart, between May and September with at least one surveys between May and August.

1) INTRODUCTION

Gradwell Group was commissioned by Frough Ltd to undertake a Preliminary Ecological Appraisal (PEA) of 233 Uxbridge High Street, Uxbridge, UB8 1LD. Planning permission is to be sought from the London Borough of Hillingdon. The PEA was carried out in July 2025 and comprised a desk-based study and an extended Phase 1 habitat survey, following the Preliminary Ecological Appraisal Guidelines (CIEEM, 2017) and standard methodologies set out in the UK Habitat Classification User Manual (UK Habitat Classification Working Group, 2018).

The site is located along Uxbridge High Street, which features a mix of shops with residential flats above. This report has been prepared by a suitably qualified and experienced ecologist. The results and recommendations presented reflect the professional opinion of the author, based on information supplied by the client, details of the proposed development, and the findings of the desk study and field survey work.

2.2 Site plan:

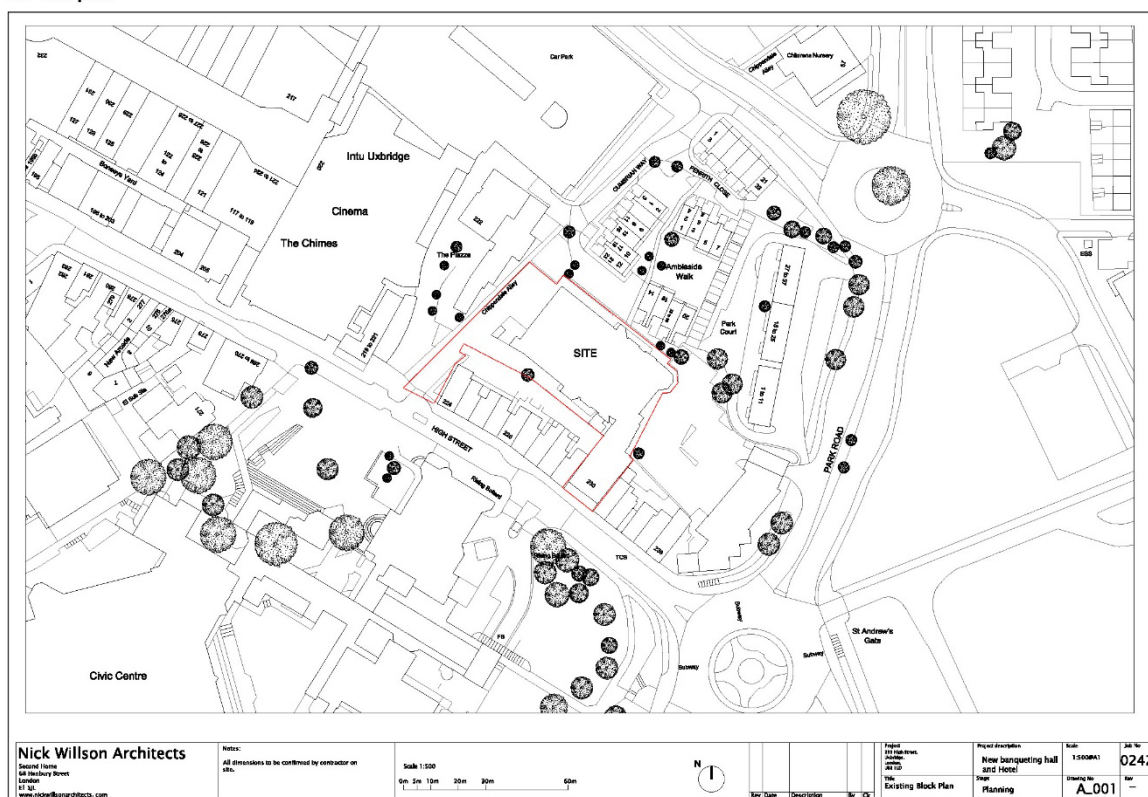


Figure 1: Existing Site Layout & Redline boundary

2) METHODS

The purpose and aims of the survey were to:

- To undertake a Preliminary Ecological Appraisal (including third-party data search) to determine the potential for protected species and/or habitats of conservation value.
- Analyse the results of a third-party biological record search to identify any protected / notable records and nature conservation designations within the local vicinity.
- Determine how the proposed works may impact on these species, habitats, designated sites or areas of nature conservation interest.
- Identify the requirement for further survey work, mitigation, compensation and / or assessment where necessary and propose suitable enhancements.

Desk Study Methodology

Existing ecological and nature conservation data relevant to the site was collated from various sources including the Multi-Agency Geographic Information for the Countryside (MAGIC) online database. Biological records were not obtained from Greenspace Information for Greater London CIC (GiGL), as it was considered unlikely that the data would alter the conclusions or recommendations presented in this report.

MAGIC Maps was used in July 2025 to undertake a 2km search for statutory designated sites for nature conservation and European Protected Species Mitigation Licences. MAGIC Maps was also used in July 2025 to assess whether the site may fall within a Site of Special Scientific Interest (SSSI) Impact Risk Zone (IRZ). All sites and record locations are given at an approximate distance from the site and coarse resolution records have not been analysed. Some records have been given at approximate distances or not included in the report where they are considered confidential; however, none of these records are relevant to the proposed development site.

The Ecological Survey Methodology

The survey was carried out on the 11th of July 2025 arriving at 10:30. The weather was 19°C, overcast, with scattered clouds and light winds (1/2 Beaufort Scale). No precipitation was encountered during the survey.

The survey was completed in accordance with the Preliminary Ecological Appraisal Guidelines (CIEEM, 2017) and standard methodology published in the UK Habitat Classification User Manual (UK Habitat Classification Working Group, 2018). The survey

involved walking over the site, mapping the main habitat types (in accordance with minimum mappable habitat sizes) and compiling a botanical species list and target notes to identify particular areas of interest or concern. Observations on the presence, or potential presence, of other certain protected species (e.g., badgers, nesting birds, reptiles and dormouse) and invasive / non-native species were recorded also. Riparian species (e.g., otter, water vole and white-clawed crayfish) have not been included in the assessment as there are no suitable water features on or adjacent to the site to support these species. The survey does not aim to be a comprehensive assessment of the presence or otherwise of all protected species on the site. There are a wide range of protected species, many of them can occur on one site and most require specialist expertise to locate them and / or seasonally constrained survey techniques to confirm their presence, and this is outside of the scope of this instruction. Phase 2 assessments and surveys have been recommended where appropriate.

Hedgerows on the site were assessed following methodology provided in the Hedgerow Survey Handbook (DEFRA, 2007). Where relevant, a native hedgerow was defined as species-rich if the structural species included at least five native woody species in a surveyed 30m section of the hedgerow. The results were then compiled and assessed against qualifying criteria provided within the Hedgerow Regulations (1997) and the UK Biodiversity Action Plan / NERC Act (2006). Further information regarding legislation, policy and methodology for species relevant to this site and provided in full within Appendix 1 of this report. This is not considered to be an exhaustive list and it may be misleading to rely upon them as the information provided may not be up to date at the time of reading. Where there is doubt as to the current legal position then it is best to seek expert legal advice.

Zone of Influence

The zone of influence refers to the geographic extent of potential impacts of a proposed development. Given the small-scale nature of the development, the zone of influence is considered to be 250m from the application boundary for amphibians and reptiles, 30m for terrestrial mammals such as badgers, and within the area of impact for birds and bats. All other impacts are considered within the site boundary unless otherwise specified.

Site Evaluation

Following the preliminary survey, the site can be classified into one of six groups to establish whether the site is considered to hold ecological value at an international, national, regional, county, district or local / site scale (see Table 1). Targeted survey work is usually required to establish the significance of protected species within the site and this evaluation is only a guide.

Table 1. This table has been constructed following the CIEEM EcIA Guidelines (CIEEM, 2018). It contains definitions of the evaluation brackets thereby indicating the importance of each habitat type and their possible habitat status.

Ecological Value	Description / Example
International	An internationally designated site or candidate site. This includes habitats or species listed within Special Areas of Conservation, Special Protection Areas, Ramsar Sites, listed under Annex 1 of the Habitats Directive.
National	Sites that are designated at a UK level. This includes Sites of Special Scientific Interest, supporting nationally threatened or rare species.
Regional	Can include a significant population or number of any nationally important species at a regional level.
Country	Can include a feature identified as of critical importance within Section 41 of the NERC Act (2006).
District	Can include a regularly occurring, locally significant population or number of a regionally important species. A Key Habitat type included within the Biodiversity Action Plan or NERC Habitat of Principal Importance.
Local / Site	Designated sites for nature conservation such as Local Wildlife Sites or viable habitat / species populations considered of value at a county level (Local Biodiversity Action Plan species).

Survey Limitations

There are a small number of limitations, but it is considered that an accurate assessment of the site has been obtained:

- The desk study and field survey does not produce a comprehensive plant or animal species list as this will be limited by factors that influence their presence (such as activity and dormancy periods). However, an assessment can be made of the habitats within the survey area particularly given that the majority of the habitats are considered to be modified. It has also been possible to ascertain their corresponding nature conservation value and the potential for them to support any protected or priority species.
- Botanical and UKHab habitat classifications were carried out outside the optimal survey period, which may have limited the identification of certain species or reduced the accuracy of habitat classification. Where habitats were identified as having the

potential to be of medium or high distinctiveness, further survey recommendations have been made to confirm their ecological value.

- Access into the building was not possible, therefore internal inspections for potential bat roost features or evidence of use by protected species could not be undertaken. As a result, any assessment of the building's suitability is based solely on an external inspection.

Report Lifespan

Given the transient nature of the subject, the survey results are considered valid for up to 18 months.

3) RESULTS

Desk Study – Statutory Sites

MAGIC maps returned one record of statutory sites for nature conservation within a 2km radius of the proposed site.

Table 2. Summary of Statutory Sites within a 2km Radius of the Application site.

Name/Type	Distance / Direction From site	Description
Fray's Farm Meadows SSSI & LNR	1.8km N	Fray's Farm Meadows SSSI & LNR is a 29-hectare Site of Special Scientific Interest (SSSI) located in Uxbridge, Hillingdon, London. It's a haven for wildlife, particularly some of London's most threatened species. The meadows are situated near the Frays River in the Colne Valley.

The Natural England Site of Special Scientific Interest (SSSI) Impact Risk Zones layer, available via the MAGIC website, was reviewed to assess whether the site lies within any zones where proposed development might affect nearby SSSIs (or the SSSI components of SACs, SPAs, etc.).

At this location, the Impact Risk Zone indicates that certain types of development, would trigger consultation with Natural England. However, the proposed development does not fall into these categories, and therefore consultation with Natural England is not required. Given the distance of the site from the designated area, it is considered that any impacts arising from the proposals can be reasonably discounted.

Desk Study – Non-Statutory Sites

MAGIC maps returned no record of non- statutory sites for nature conservation within a 1km radius of the proposed site.

Desk Study – Priority Habitats

MAGIC maps identified eight records of priority habitat sites for nature conservation within a 1km radius of the proposed site, the majority being deciduous woodland. No priority habitats are present within the application boundary; the nearest site is located 500m east

(deciduous woodland) of the development area. The proposed development is small in scale and not located directly adjacent to any priority habitats. With the planned implementation of best practice construction measures, such as controls for water and dust pollution, no impacts are anticipated to these sites.

Desk Study – Magic Maps (MAGIC)

A review of MAGIC Maps revealed two European Protected Species (EPS) licence applications within a 1km radius of the site, both for Great Crested Newt (GCN); the closest record of GCN is 800m north-east from the site.

- GCN: EPSM2009-471; 20/04/2010-31/07/2010 – Destroy RP
- GCN: 2014-1880-EPS-MIT; 19/09/2014-31/03/2025 – Destroy/Damage RP

UK Habitat Classification Survey and Habitat Evaluation

The results of the UK Habitat Classification Survey are presented below. The habitats on the site have been evaluated as having site value in relation to the immediate surroundings and a regional context.

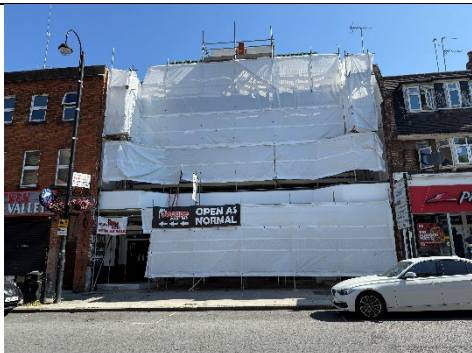
Planning consent will be sought from London Borough of Hillingdon, following a review of local guidance to determine the habitats' strategic significance. The Biodiversity Net Gain Guidance Document for the Local Planning Authorities was consulted.

Where no relevant plan, strategy, or policy exists, professional judgment may be used to classify habitats as having medium strategic significance, particularly if they provide a link between other strategic locations. Ecologist consultants may apply their judgment to this determination, but a strong justification will be required.

The following habitats and ecological features were recorded within or immediately surrounding the site:

- U; Urban; u1; Developed Land; Sealed Surface; u1b
- U; Urban; u1; Developed Land; Sealed Surface; Buildings; u1b5
- W; Woodland & Forest; w1; Tree (Urban); 200

Table 3. Habitats and features within and immediately surrounding the site.

Habitat/Feature	Description	Photographs
U; Urban; u1; Developed Land; Sealed Surface; u1b	Extensive areas of sealed, impervious surfaces comprising predominantly concrete, forming car parking, yard, and loading areas. Vegetation cover is minimal, consistently below 10%. The concrete is in good condition, showing minimal cracking and negligible weed growth, indicating limited opportunities for natural successional growth.	 Figure 1: Areas of hardstanding
U; Urban; u1; Developed Land; Sealed Surface; Buildings; u1b5	The site features a large existing building/permanent enclosed structures. The building is L shaped, and the main entrance occupies the main high street frontage, the majority of the building sits behind the row of shops/terraced buildings along the high street.	 Figure 2: Front of B1  Figure 3: Rear of B1

W; Woodland & Forest; w1; Tree (Urban); 200	Scattered trees are present primarily along the northern and southern boundaries of the site. Species are mixed, with the majority comprising Silver Birch <i>Betula pendula</i>, alongside occasional Sycamore <i>Acer pseudoplatanus</i>. Tree maturity varies across the site; however, due to the urban context, many exhibit signs of adverse conditions. More than 20% of the canopy over sails hardstanding with minimal or no ground vegetation, limiting opportunities for natural regeneration and affecting overall tree health and size.	 Figure 4: Trees along the southern boundary  Figure 5: Tree in the north-west corner
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Invasive Weeds Assessment

A thorough assessment was conducted to determine whether any invasive plant species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) are present on the site. No species listed under Schedule 9 were recorded during the site survey. However, it is important to note that the absence of identified Schedule 9 species during the survey does not guarantee their absence from the site. Some invasive species may not have been visible at the time of the assessment due to seasonal growth patterns or may exist in areas not fully accessible during the survey.

Evaluation for protected and notable species

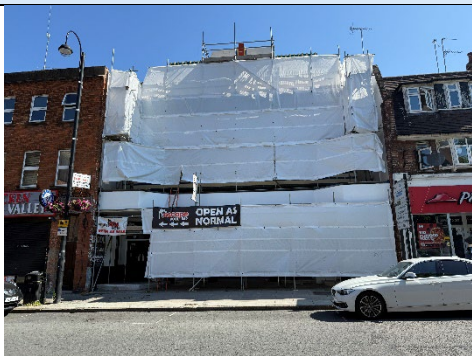
Observations regarding the presence of, or opportunities for, any other protected, rare, or notable faunal species were made during the site visit.

ROOSTING BATS

There is no known bat roosts recorded within any of the buildings or trees inside the application boundary. The building was assessed and found to have features offering potential suitability for bats, as detailed in the table below. However, no evidence of bats—such as live or dead individuals, droppings, or urine staining—was observed externally on any of the buildings during the survey.

The site also contains scattered trees. All visible trees were inspected and categorised following the Bat Conservation Trust Guidelines (Collins, 2023; see Appendix 1). The trees within the site boundary were assessed as having negligible potential to support roosting bats, owing to the absence of any significant roosting features.

Table 6. Descriptions of the Building and it's suitability for roosting bats.

Feature	Description / Suitability	Photographs
B1	The building features a large entrance that fronts onto the high street. At the time of the survey, much of the front elevation was obscured, meaning some potential roosting features may not have been visible or assessed. The L-shaped building extends behind adjacent terraced properties and comprises a large, multi-storey brick structure. The façade is predominantly solid brickwork and includes various ventilation grilles, vents, and metal access doors. The roofline includes raised central sections and chimney-like structures, which may offer potential roosting opportunities for bats, particularly where access points such as cracks, lifted flashing, or gaps around vents are present. The pitched roof is constructed of corrugated metal and appears to be well-sealed, with no obvious signs of damage, warping, or missing sections. However, the building does feature large cracks in the brickwork and areas of missing concrete within the eaves,	 Figure 6: Front of B1  Figure 7: Rear of B1 

	which could provide suitable roosting features for crevice-dwelling bat species. The building (B1) is assessed as having moderate suitability for roosting bats - with one or more potential roost sites that could be used by bats due to their appropriate condition (i.e., size, shelter, protection). Two presence / absence surveys, which have to be three weeks apart, between May and September with at least one surveys between May and August.	Figure 8: B1 roof  Figure 9: Missing concrete  Figure 10: Cracking in brickwork 
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It is likely that some of the buildings may be renovated and/or demolished. If any buildings with suitability for bats are expected to be demolished, felled or renovated, then further surveys will be required in line with the recommendations provided. A full assessment will be needed for those buildings with limited / no access.

COMMUTING/FORAGING BATS

The site includes scattered trees though these are not likely to support commuting and foraging bats. Any development at the site is likely to be restricted to areas of less interest to bats such as areas of buildings / hardstanding. Therefore, it is not anticipated that the development will impact upon any areas important for commuting / foraging bats. Mitigation measures have been provided in the next section which details the requirements for any new artificial lighting to ensure that impacts to foraging and commuting bat species remains negligible.

AMPHIBIANS AND REPTILES

The site is largely dominated by hardstanding and buildings. While these features may provide some limited opportunities for common reptile species, the overall extent and quality of suitable habitat is poor and fragmented. The site is therefore considered to have low potential to support reptiles. The site has a negligible potential to support the rarer reptiles such as adder, smooth snakes and sand lizards. Further survey work is not recommended, though Reasonable Avoidance Measures (RAMs) should be implemented during works to minimise potential impacts.

GREAT CRESTED NEWTS (GCN)

The site has habitats such as hardstanding and buildings and are considered sub-optimal for these species. The areas of impact are likely to be restricted to sub-optimal habitats only. No suitable waterbodies were identified within a 500m radius of the application boundary. No further survey work is recommended given the low likelihood of encountering GCN. The next section sets out guidance on Reasonable Avoidance Measures to be undertaken during the site clearance and construction phases of the development. This is considered to be sufficient to avoid a breach in legislation. In the event of encountering a great crested newt, then works should cease and the advice of a suitably qualified ecologist should be sought.

BADGER

Sett-building opportunities are negligible, due to no suitable habitat across the site. No evidence of badgers was identified during the survey. However, precautionary working methods should be carried out pre-construction and during construction. Any other impacts to badgers are considered negligible, and no further survey work is required.

NESTING BIRDS

The assessment was undertaken during the active breeding bird season. Three bird species were seen and / or heard incidentally during the survey. These included magpie *Pica pica*, Common Pigeon *Columba livia* and blackbird *Turdus merula*. All the aforementioned birds are green listed Birds of Conservation Concern (BoCC) i.e., birds not showing moderate or severe declines. The buildings and trees provide areas suitable for nesting birds. The site is unlikely to support ground nesting birds given the nature of the site. Given the likely small-scale nature of the proposed works, nesting birds should be considered further for their legal protection only. Any renovation should ideally be timed to avoid the nesting bird season

(typically March to September inclusive). Further recommendations for mitigation and enhancements measures relating to nesting birds has also been provided.

HAZEL DORMOUSE

There are no hazel dormouse *Muscardinus avellanarius* records within a 2km radius of the site. There are no granted European Protected Species (EPS) Mitigation Licences for hazel dormouse on MAGIC within a 2km radius of the site. The site does have habitats (e.g., woodland) to support dormice. Hazel dormice are not considered further in this report.

INVERTEBRATES

The peripheral habitats such as the mature trees may support important invertebrate assemblages but these are all set to be retained and unimpacted by the development. The remainder of site is unlikely to impact rare and / or notable invertebrates due to the limited diversity of plants and number of modified habitats. No other triggers were identified to suggest that the development will impact any protected or notable assemblage of invertebrates. They are not considered further in this report other than for possible enhancements.

OTHER SPECIES

It is possible that hedgehogs may utilise the site for foraging and commuting with preference likely given to the vegetated areas and boundary habitats. Precautionary working methods are considered sufficient for small mammals including hedgehogs and this will ensure there are no breaches in legislation during site clearance / construction activities. The site is unsuitable to support brown hare, polecat and harvest mouse and so they are not considered further in this report.

4) RECOMMENDATIONS

Recommendations for measures to avoid impacts on identified features of nature conservation interest, as well as opportunities for ecological enhancement, are provided below. The survey findings should be used to inform and guide any future development proposals.

Habitats / Biodiversity Net Gain

In line with local and national policy, the proposed development should seek opportunities to incorporate ecological enhancements. A Construction and Environment Management Plan (CEMP) could be considered and secured as a condition of planning. Dust prevention measures must also be detailed in a CEMP to ensure no adverse effects to adjacent habitats.

The development must also ensure that best practice measures are effectively implemented to ensure the protection of adjoining habitats. Chemicals must be securely stored on areas of hardstanding / another sealed surface, following COSHH guidelines. All those working on the site should have access to spill kits and appropriate training in their use.

It is recommended that the loss of trees is avoided as far as possible. Where this is not possible, losses should be minimised and compensated for appropriately by way of replacement tree planting elsewhere on the Site. As far as possible trees should be of native species, local provenance and appropriate to the soil/drainage conditions on the Site. Replacement of trees should be designed to maintain connectivity around and/or within the Site, in particular for bats and birds which are likely to be using the area, and as far as possible should be unlit.

Roosting Bats

The current proposals indicate that the buildings may be renovated or demolished. Due to the moderate suitability of Building (B1) for roosting bats, should any of the suitable buildings be demolished, renovated or impacted indirectly by the proposals (e.g., lighting), then further bat activity surveys will be required to confirm the presence / likely absence of bats and to determine the roost types, numbers and level of mitigation required, if applicable. The bat activity surveys require suitable weather conditions, and the survey would need to be supported by night-vision aids. The results of the surveys are required

prior to the determination of planning as the design proposals may require amendments based on the results of further survey work. The level of surveying would be as follows:

- Buildings with moderate potential (i.e., Buildings B1) would require at least two presence / absence survey between May and August. These surveys should cover all potential roosting features and must be three weeks apart, between May and September with at least one surveys between May and August.

If bats or evidence of bats (e.g., droppings, dead bats and/or staining) are found, then stop work immediately and contact an ecologist. An appropriate protection / mitigation strategy will need to be designed and submitted to the local planning authority. A European Protected Species Mitigation (EPSM) licence application will also be required.

A minimum of two bat box (e.g. Schwegler 1FR Bat Tube or Integrated Eco Bat Box Crevice) should be placed on or within the buildings post-development or trees within the site in accordance with the retailer's instructions (see Appendix 7). The boxes should be at least 4m above ground level, away from lights and not placed above / near windows.

Foraging and Commuting Bats

The requirements of any future lighting must be assessed and implemented in line with best practice guidance to inform a sensitive lighting strategy. Such guidance should include construction work being limited between the hours of dawn and dusk, site specific lighting practices (e.g., low-light levels and use of timers) and the avoidance of light spill onto boundaries and adjoining habitats.). These documents contain further information: BCT and ILP (2023) and Matthews et al. (2015).

The planting and buffering of existing habitats, including hedgerows and nectar-rich species, is encouraged and should be incorporated into any landscape plans. Species for linear features could include hawthorn, blackthorn, hazel, field maple and spindle. Night flowering plants such as honeysuckle, evening primrose, field scabious and vervain will benefit the invertebrate prey of bats.

Breeding Birds

Any vegetation removal (e.g., trees) and building demolition / conversion must avoid the nesting bird season (typically March to September inclusive) or otherwise be checked by a suitably qualified ecologist immediately prior to clearance / construction to check for nesting birds if undertaken during the nesting season. If any nests or evidence of nesting is found

then suitable buffer zones will have to be implemented until the chicks have fledged or until the nest has been confirmed as redundant. The netting of any suitable bird nesting habitat is prohibited (CIEEM and RSPB, 2019).

A minimum of two boxes should be erected on or within the buildings post-development or trees within the site. Suggestions for bird boxes include sparrow boxes (e.g., Schwegler 1SP), swift boxes (e.g., Ibstock Eco-Habitat for Swifts), starling boxes (e.g., Woodstone Starling Nest) and generalist boxes (e.g., Woodstone Build-In Box) (see Appendix 5).

General Recommendations

Planting additional trees, hedgerows and shrubs as part of a landscaping scheme should comprise native and locally appropriate species. If possible, species that provide pollen, nectar and fruit should form part of the landscaping to provide a food source for common birds. Species which could be considered include hazel, hawthorn, blackthorn, dog-rose, wayfaring tree, sweet-briar, dogwood, common buckthorn and guelder rose. Any hedgerows and trees to be retained must be protected in line with the British Standard: Trees in Relation to Design, Demolition and Construction (BS5837:2012).

These working methods are appropriate for mammal species of principal importance including hedgehogs as well as other species (e.g., herpetofauna):

- Prior to works commencing, any log piles, brash piles and stone piles must be removed carefully. If any species are discovered, then an ecologist should be contacted to advise or relocate the animal(s) to a suitable location, where appropriate.
- Work on the site may create rubble piles which may have the potential to be utilised as places of rest or shelter. Such debris must be removed from the site immediately or placed into skips prior to removal, or on pallets if to be reused.
- Escape routes must be provided within any pits dug for the foundations. Such ramps must be no steeper than 45 degrees in angle and must be constructed using rough wooden planks. Any excavations left open overnight must be checked first thing in the morning prior to works recommencing.
- Any exposed open pies should be capped to prevent hedgehogs and other small mammals from gaining access.
- Undertake clearance and construction work between dawn and dusk in daylight hours.

- All vegetation and piles (e.g., brash, wood and deadwood) should be checked by hand prior to clearance / removal.
- If burning any cleared vegetation, carry this out immediately after piling to prevent hedgehogs from moving in prior to burning.
- If protected species are unexpectedly discovered, works must cease immediately, and a suitably qualified ecologist must be contacted. An appropriate protection / mitigation strategy will need to be designed and submitted to the local planning authority. A European Protected Species Mitigation (EPSM) licence application may also be required.
- Hedgehog highways are recommended to be incorporated into fences, to facilitate safe movement and provide suitable habitats for hedgehogs within the site.

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APPENDIX 1 – RELEVANT LEGISLATION

Please note, the below legislation and planning policy is not exhaustive, and this does not constitute legal advice.

Bats

Bats are a European Protected Species. Individual bats and their roosts have strict protection and are listed in Annex IV of the EC Habitats Directive 1992 (transposed into law through the Conservation of Habitats and Species Regulations 2017). Some bats have a higher conservation concern in Europe. The habitats supporting these species can be designated as Special Areas of Conservation and the bat species concerned are then listed under Annex II of the Habitats Directive. Species listed on Annex II include the barbastelle, Bechstein's bat, greater horseshoe and lesser horseshoe.

Substantial penalties, which include fines and custodial sentences, are now in place for offenders under the Conservation of Habitats and Species Regulations 2017. The actions and activities that are prohibited are:

- Deliberate capture, injury or killing of a bat,
- Damage or destruct a breeding site or resting place (even if currently vacant),
- Possess, control, transport, sell or exchange, or offer for sale or exchange, of any bat or any part of a bat or anything derived from one, and
- Deliberate disturbance of a bat, in particular disturbance which is likely to impair their ability to: survive, breed or reproduce; rear or nurture their young; hibernate; migrate; or affect the local distribution or abundance of the species.

The Wildlife and Countryside Act 1981 (as amended), which is the primary legislative Act covering wildlife in the UK, affords protection to all the species of bats in the UK. Various amendments have been made to the Act and recent changes include an offence for the reckless damage of roosts or disturbance of bats. Legal precedence also ensures that roost sites are protected on a regular basis year on year regardless of whether bats are present at the time of inspection.

Many bats are described as being of principal importance for the purpose of conserving biological diversity under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The NERC Act places a biodiversity duty upon local and national government departments to ensure the conservation of biodiversity. The National Planning

Policy Framework (NPPF) also sets out the government's planning policies within England and this aims to promote and ensure sustainable development.

An assessment of any structures and trees within the site was also conducted. The assessment of the structures and trees follows best practice guidelines and techniques and the report has been written in line with recommendations within the new bat survey guidelines (Collins, 2023).

Any structures are initially assessed to have either high, moderate, low, negligible or no suitability to support roosting bats. This is based on the presence of suitable roosting features and also includes an assessment for bat evidence (e.g., feeding remains, staining, bat droppings and individual bats). The categories are allocated irrespective of the presence of a roost. For example, if a bat roost is confirmed to be present then the categorisation still stands but confirmed roost should be added (e.g., high suitability – confirmed roost). Structures assessed to have none or negligible roosting potential do not usually need further surveys. However, those with Low, Moderate or High potential or Confirmed will require additional surveys to confirm if bats are present and to characterise the roost. Buildings are categorised as follows:

- No ('none') suitability – 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). No further surveys necessary.
- Negligible suitability – no obvious features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use and apparently unsuitable features on occasion. No further surveys necessary.
- Low suitability - 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 appropriate conditions (i.e., space, protection, shelter) and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e., unlikely to be used as a maternity roost and not a classic cool/stable hibernation site but could be used by individual hibernating bats). One presence / absence survey between May and August.
- Moderate suitability - a structure with one or more potential roost sites that could be used by bats due to their appropriate condition (i.e., size, shelter, protection) and surrounding habitat. However, it is unlikely to support a roost of high conservation value (with respect to roost type only such as maternity or hibernation). Two presence / absence surveys, which have to be three weeks apart, between May and September with at least one survey between May and August.

- High suitability - 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 conditions (i.e., size, protection, shelter) and surrounding habitat. These structures have the potential to support high conservation roosts e.g., maternity or classic hibernation site. Three presence / absence surveys (including for confirmed roosts), which have to be three weeks apart, between May and September with at least two surveys between May and August.

A Ground Level Tree Assessment (GLTA) for bats was also conducted which searches for potential roosting features within trees from the ground. This is a baseline survey only that determines whether there is an available roosting resource (e.g., woodpecker holes, natural holes, knotholes loose bark, cracks and splits) and the need for further survey and/or mitigation. Any Potential Roosting Features (PRFs) are then categorised as either negligible (no noteworthy potential roosting features) or:

- PRF-I - PRF suitable for individual bats or very small numbers of bats either due to the size or lack of suitable surrounding habitats (not a confirmed bat roost). No further surveys are necessary but precautionary method of works for removal and provision of roosting compensation is necessary.
- PRF-M - PRF suitable for multiple bats and may therefore be used by a maternity colony or known roost i.e., known roost present for example, through local records, evidence and sightings. Three climbing inspection surveys, at minimum three week intervals), are required for PRF-M features which should be undertaken May to September with at least two surveys between May and August. If climbing and inspection if not possible, then three dusk emergence surveys with night-vision aids will be required between May and September, with three-week minimum intervals), with at least two surveys between May and August. If a maternity colony is identified, then less invasive methods, such as dusk emergence surveys with night-vision aids should be employed.

The assessment of the site to support commuting and foraging bats follows best practice guidelines and techniques and the report has been written in line with recommendations within the new bat survey guidelines (Collins, 2023). The site is categorised as follows:

- Negligible suitability – no habitat features on site likely to be used by commuting or foraging bats. No survey effort required to establish the habitat value.
- Low suitability – habitats that could be used by low numbers of commuting bats such as an isolated gappy hedgerow or suitable, yet isolated, habitat that could be used by foraging bats such as individual trees. Survey efforts includes one Night-

time Nat Walkover survey per active season (Spring – April/May, Summer – June/July/August and Autumn – September/October) and static automated surveys which include data collected over a five-night period in each aforementioned season.

- Moderate suitability – habitats that are well connected to the wider landscape that could be used by commuting bats such as tree lines and hedgerows or by foraging bats such as open water and scrub. Survey efforts includes one Night-time Nat Walkover survey per active season (Spring – April/May, Summer – June/July/August and Autumn – September/October) and static automated surveys which include data collected over a five-night period in each month from April to October.
- High suitability – habitats that are well connected to the wider landscape that are highly conducive to commuting bats such as river valleys and woodland edge or by foraging bats such as broadleaved woodland and grazed parkland. Survey efforts includes one Night-time Nat Walkover survey per active season (Spring – April/May, Summer – June/July/August and Autumn – September/October) and static automated surveys which include data collected over a five-night period in each month from April to October.

Badgers

Badgers and their setts are afforded strict protection under the Protection of Badgers Act 1992. This Act consolidates past badger legislation and, in addition to protecting the badger itself, makes it an offence to damage, destroy or obstruct badger setts. Badgers are also protected under Schedule 6 of the Wildlife and Countryside Act 1981 (as amended), and listed under Appendix III of the Bern Convention, as a species that is in need of protection but may be hunted in exceptional instances. Only badger setts that are currently in use are covered by wildlife legislation.

Surveys are undertaken in line with guidance in Surveying Badgers by Harris *et al.* (1989). A 30-metre zone of influence is considered appropriate for this species based on their known tolerance for disturbance. Any evidence (e.g., badger setts, latrines and snuffle holes) and suitability is noted by the surveyor as well as any disused holes.

Birds

All wild birds in the UK are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) which makes it an offence to intentionally kill, injure or take any wild bird or to take, damage or destroy the nest or its eggs.

Some bird species, such as the barn owl, are listed in Schedule 1 of the 1981 Act and receive further protection, making it an offence to intentionally or recklessly disturb these birds

whilst building a nest or in, on or near a nest containing eggs or young; or to disturb dependent young of such a bird.

The NERC Act (2006) inserts a new schedule into the Wildlife and Countryside Act (1981) to protect the nests of some bird species that regularly re-use their nests, even when the nests are not in use. This protection currently applies to golden eagle, white-tailed eagle and osprey. Bird surveys are carried out in accordance with Bird Monitoring Methods (RSPB) (Gilbert *et al.*, 1998).

Reptiles

All British reptiles are listed under schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and are therefore protected from intentional killing or injury. This is largely as a consequence of a national decline in numbers associated with habitat loss.

Two scarcer native British reptiles (smooth snake and sand lizard), are afforded 'full' protection. This legislation makes it an offence to intentionally or recklessly kill, injure, disturb, take, possess or sell these species (in all life stages). It is also illegal to damage, destroy or obstruct access to places they use for breeding, resting, shelter and protection.

All species of reptile are priority species in the UKBAP and have been adopted as Species of Principal Importance under Section 41 of the NERC Act (2006) in England (Section 42 in Wales).

Assessments consider information and methodology provided within the Reptile Habitat Management Handbook (Edgar *et al.*, 2010) and the Herpetofauna Workers Manual (Gent and Gibson, 2003).

Amphibians

Great crested newts and their habitats are fully protected by the Conservation of Habitats and Species Regulations (2017) and partially protected under the Wildlife and Countryside Act 1981 (as amended). This legislation makes it an offence to kill, injure or capture great crested newts, their young or eggs, or destroy / damage their ponds or places of shelter used for breeding or protection. The great crested newt is also a Priority species in the UK Biodiversity Action Plan (UKBAP) and had been adopted as a Species of Principle Importance in England under Section 41 of the NERC Act 2006.

The natterjack toad is fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of The Conservation of Habitats and Species Regulations 2017 making it a European Protected Species. The natterjack toad is also a priority species under the UK Biodiversity Action Plan.

The pool frog is protected under the Conservation (Natural Habitats &C.) Regulations 1994 (as amended). As a European protected species, the deliberate capturing, disturbing, injuring or killing of this species is prohibited, as is damage or destruction of its breeding sites or resting places. The pool frog is also a priority species under the UK Biodiversity Action Plan due to a 100% decline over 25 years (1980-2005).

Common toads are also designated UKBAP species due to a serious decline of populations across large areas of southern, eastern and central England, thought to be mainly due to changes in habitat management, mortalities on the roads, and climate change.

Great crested newt site assessments are undertaken in accordance with English Nature (2001) and Langton *et al.* (2001). Any aquatic and terrestrial habitats on the site and in the immediate vicinity were assessed for their suitability for use by great crested newts. Great crested newts have been known to travel up to 500m between breeding ponds and suitable habitats. However, they are more likely to remain between the breeding pond and up to 250m away if there are suitable terrestrial habitats. Therefore, a desk-based search was undertaken prior to the ecological survey for ponds up to 250m from the site using aerial imagery and OS mapping. The terrestrial habitat between the site and these ponds, and therefore connectivity to the site, was also considered (if applicable). Major barriers such as major roads or fast-flowing watercourses are likely to prevent dispersal of great crested newts to the wider environment.

Habitat Suitability Index (HSI) assessments provide a mechanism by which the suitability of a pond to support great crested newts can be objectively assessed in order to assist the identification of ponds potentially supporting this species (Oldham *et al.*, 2000). For the HSI assessment, the locations of waterbodies within a 250m radius of the site were identified from online aerial photographs and a 1:10,000 scale OS map. A HSI assessment was undertaken on each waterbody with ecological connectivity. To make the HSI assessment, the standing waterbody is scored in relation to 10 suitability indices: location, waterbody area, pond drying, water quality, shade, waterfowl presence, fish presence, number of standing waterbodies in the local area, terrestrial habitat, and macrophyte cover. Each of these features is awarded a score between 0 and 1, and a final score is calculated, also between 0 and 1. This final score enables the standing waterbody to be ranked in terms of its suitability (poor <0.5, below average 0.5 - 0.59, average 0.6 - 0.69, good 0.7 – 0.79 or excellent > 0.8) and an estimate made of the predicted presence of great crested newts within the standing waterbody. The presence of any great crested newt eggs or individual great crested newts were also recorded if applicable as well as the descriptions of the aquatic and surrounding terrestrial habitats. Further surveys, in the form of eDNA surveys or traditional methods (e.g., bottle trapping) may be required, if presence / absence and a population assessment is required. A general assessment for other amphibians was also undertaken.

Dormice

Common dormice and their habitats are fully protected by both the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations (2017). This legislation makes it an offence to kill, injure, disturb or capture dormice, or destroy or obstruct their resting or breeding places.

The dormouse is also a priority species under the UK Biodiversity Action Plan and has been adopted as a species of Principal Importance in England under Section 41 of the NERC Act 2006 (section 42 in Wales) and so is protected from any adverse effects as a result of development.

Hedgehogs

Hedgehogs are UK Biodiversity Action Plan (BAP) species, and therefore must be taken into consideration as part of development planning.

All Mammals

The Wild Mammals (Protection) Act 1996 offers protection to all wild species of mammal, irrespective of other legislation, and focuses on animal welfare, rather than conservation. Unless covered by one of the exceptions, one is guilty of an offence if they mutilate, kick, beat, nail or otherwise impale, stabs, burns, stones, crushes, drowns, drags or asphyxiates any wild mammal with intent to inflict unnecessary suffering. Its application is typically restricted to preventing deliberate harm to wildlife in general during construction works and similar.

The Wildlife and Countryside Act 1981 (as amended)

The Act and its various amendments have been created from pre-existing legislation and support the Conservation of Habitat and Species Regulations (2017, as amended) in implementing the Berne Convention (1979) and Directive 2009/147/EC on the conservation of wild birds. The schedules within this Act provide a list of protected species and habitats as well as prohibited actions. The Act also contains measures for controlling invasive non-native species under Schedule 9 and amendments to a number of laws including public rights of way. Further details have been provided above for specific species.

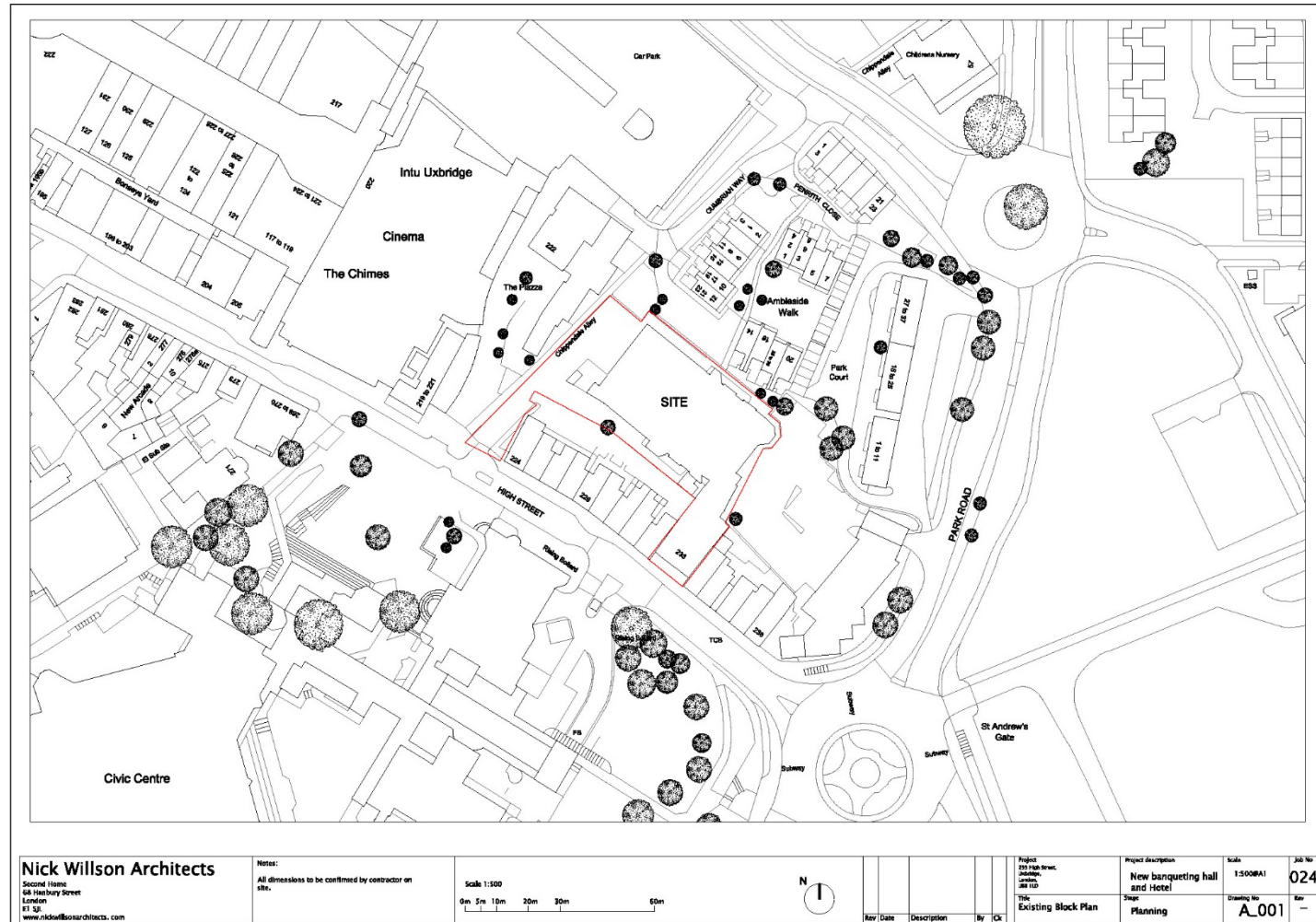
The Conservation of Habitats and Species Regulations 2017 (as amended)

These Regulations are the primary method by which the Council Directive 92/43/EEC under Conservation of Natural Habitats and of Wild Fauna and Flora (the 'Habitats Directive') is transposed for England and Wales and their territorial seas. These Regulations form the basis for implementation of Europe's nature conservation policy through habitat and species level protection. It also requires the designation of European sites known as Special Areas of

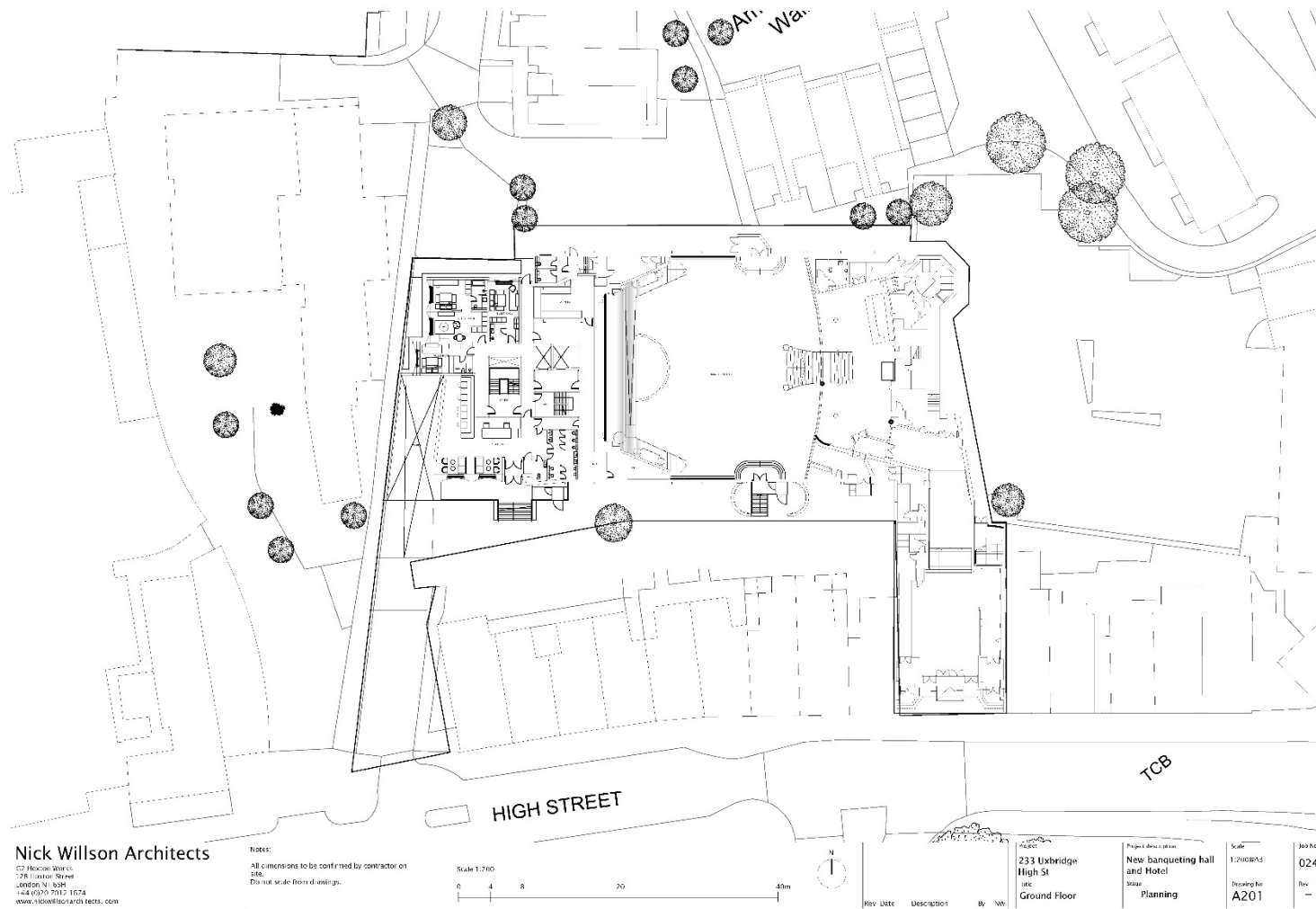
Conservation (SAC). Taken collectively with the Special Protection Areas (SPAs), which are underpinned by the Birds Directive, these form the Natura 2000 Network of protected sites. Public bodies must exercise their nature conservation responsibilities in order to ensure compliance with these Regulations. These Regulations also require conservation of natural habitats and habitats of species through selection process which are afforded protection under the Habitats Directive. The Regulations contain provision for the appropriate management of sites such as the control of damaging operations special nature conservation orders and restoration orders. The Regulations offer strict protection to European Protected Species under Schedule 2 and plants under Schedule 5. Such offences may include the deliberate capture, killing, disturbance or trade of these animals. Similarly, plants listed under schedule five are typically protected from picking, collection, cutting destruction or trade.

APPENDIX 2 – EXISTING SITE LAYOUT

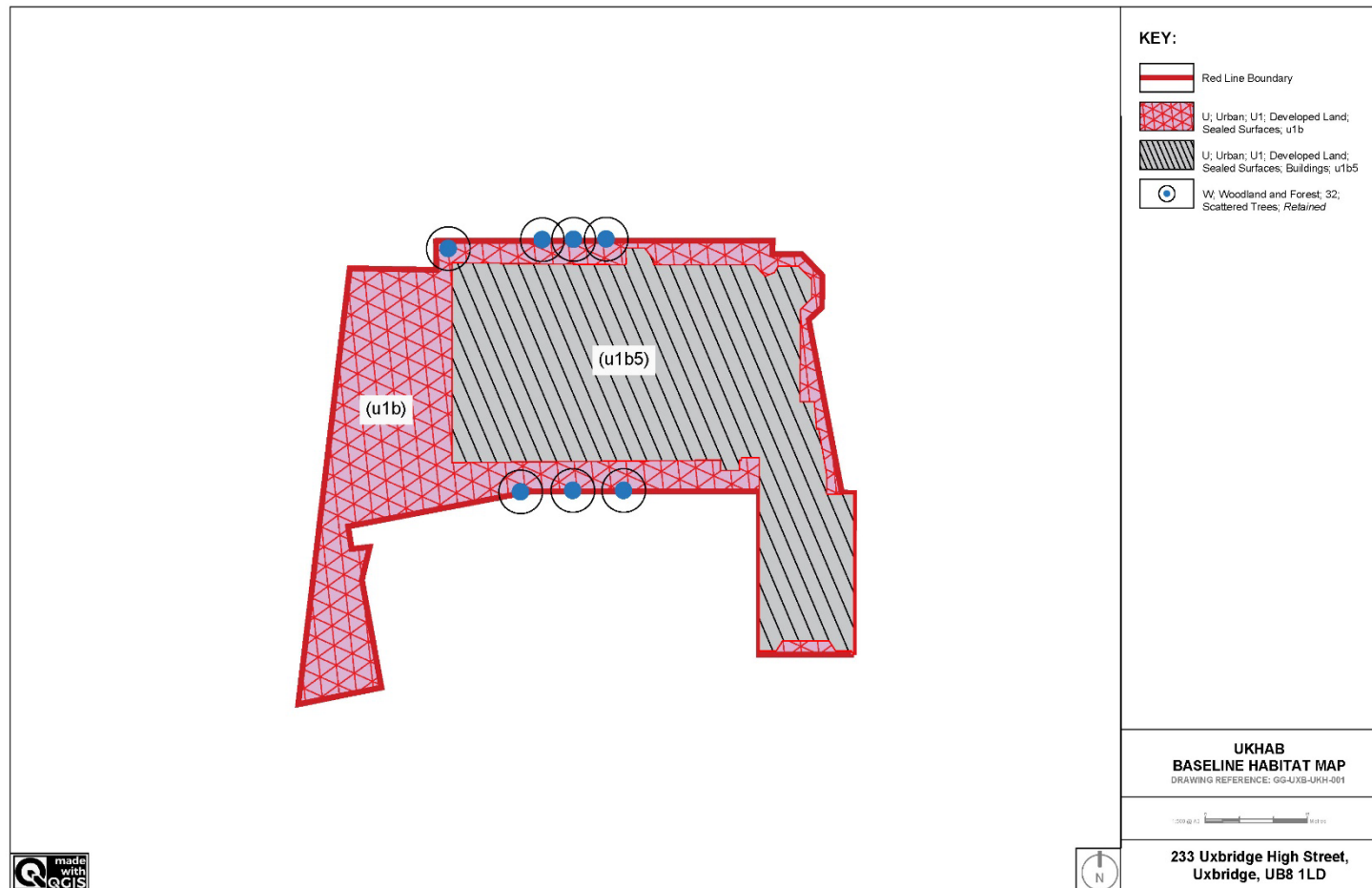
2.2 Site plan:



APPENDIX 2 – PROPOSED SITE LAYOUT



APPENDIX 3 – UKHAB SURVEY (EXISTING)



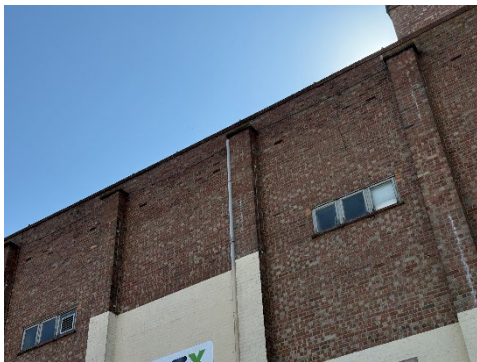
APPENDIX 4 – SITE PHOTOGRAPHS



View facing down the high street



Mature trees opposite B1



View of the rear façade



View facing down the southern boundary



View facing the proposed entrance



View facing B1 (rear of the property)

APPENDIX 5 – ENHANCEMENT RECOMMENDATIONS



WoodStone Build-In Open Nest Box



Schwegler 1SP Sparrow Terrace



Ibstock Eco-Habitat for Swifts



Integrated Eco Bat Box, Crevice



Schwegler 1FR Bat Tube



Invertebrate Tower / Log Pile

END OF REPORT

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